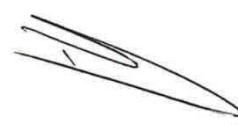


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ENVIRONMENTAL POLICY

REVIEW HISTORY				
Date	Index	Drawn up by :	Validated by :	Approved by :
18/11/2024	A : Creation of the document	B. DUCLOS, Global EHS Operations VP 	A. CHAFFOIS, VP Environmental Sustainability 	D. MENESES, EVP People & Sustainability 
Distribution	All Group sites			

PERIMETER

☒ Group ☐ Division

☐ Site(s)

INTRODUCTION

OPmobility, an independent family-owned industrial group since 1947, has placed sustainable development at the heart of its strategy, making it one of the Group's 3 pillars along with operational excellence and innovation. Aware of the risks and opportunities presented by growing environmental challenges, OPmobility confirms its commitment to sustainable mobility.

The Group has chosen to focus its strategy on the development of responsible product and service offerings, with a strong emphasis on environmental protection and corporate social responsibility. The company is developing its industrial base to be as close as possible to its customers, to provide them with the best just-in-time service, while controlling the environmental footprint of its products.

SCOPE OF APPLICATION

This policy applies to **all OPmobility Business Groups** (Exterior, Lighting, Modules, C-Power, H2-Power). It also extends to subcontractors working on behalf of the company.

GENERAL PRINCIPLES

OPmobility is committed to:

- **A responsible environmental policy ;**
- **Respect and anticipate legal and other requirements** to which it has subscribed.
- **Adhere to major international principles** in favor of environmental preservation, such as the UN Global Compact, the UN Sustainable Development Goals, the OECD Guiding Principles and the Paris Climate Agreement.
- **Continuously improve our environmental management system** to minimize our footprint.

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- **Raising awareness among our stakeholders** of the need to respect the environment and biodiversity to meet the challenges of the future.
- **Deploy** an ambitious **carbon neutrality roadmap**.

PRIORITY AREAS

OPmobility has broken down its environmental policy into several thematic sections with the aim of :

- **1) Mitigate global warming.** OPmobility is committed to achieving carbon neutrality for its Scopes 1 and 2 by 2025¹ (emissions linked to its operations), with offsetting accounting for less than 20% of overall emissions, and to reducing its Scope 3 emissions by 30% by 2030 compared with 2019. The Group has set itself a target of carbon neutrality across all its scopes by 2050.
- **2) Prevent the risk of pollution** by limiting the use of chemicals of concern throughout the value chain, and by avoiding the discharge of microplastics.
- **3) Reduce its impact on water**, particularly in water-stressed areas,
- **4) Protect and preserve biodiversity**, by carrying out concrete projects in sensitive areas and formalizing our commitments to international initiatives such as act4nature,
- **5) Promote the circular economy**, by enforcing strict waste management, systematizing the use of product life-cycle analyses, forging strategic partnerships to accelerate the development and use of recycled materials, improving product recyclability and repairability, and innovating to provide more sustainable products.

LEVERS

Operational governance

Environmental policy is fully integrated into the Group's governance. It is :

- Defined at Management Committee level,
- Promoted by all our Business Groups,
- Supported by action plans and investment projects,
- Managed by dedicated committees.

Technical experts, backed up by an HSE network of correspondents at each site, provide support to management in the implementation and operational monitoring of our environmental policy.

In addition, this HSE network is **supported by Sustainability Ambassadors**, volunteer employees who are responsible for raising awareness of sustainable development issues within their own entities, and for disseminating information and best practices.

ACT FOR ALL, the global sustainability program for :

- Train, empower and involve employees in environmental issues.
- Define, monitor, improve and communicate sustainable development indicators with interested parties, to pursue the logic of continuous improvement.

¹ For acquisitions made in 2022, the objective of neutrality on scopes 1 and 2 is 2027.

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- Deploy ISO 50001, ISO 14001 and TOP Planet internal programs for all production sites.

The 6 environmental basics

OPmobility completes its environmental prevention management approach at its sites with 6 simple, pragmatic instructions on the following topics:

- Reduced electricity and gas consumption
- Temperature control
- Resource conservation
- Water and soil protection
- Green IT
- Low-carbon mobility



The ACT FOR ALL Climate School

The ACT FOR ALL Climate School is an in-house training programme comprising 19 videos. It enables participants to explore topics related to sustainable development. Each video is designed to be dynamic and informative, to provide valuable knowledge and a seamless integration of sustainable practices and to foster a positive corporate culture.

This training programme is accessible to everyone, and its content is available in eight languages: English, French, German, Spanish, Portuguese, Chinese, Polish and Slovakian.

SECTION 1 – CLIMATE



CLIMATE CHANGE

The fight against climate change, induced by the growing emission of greenhouse gas (GHGs) into the atmosphere, is widely recognized as one of the major challenges of our century. The Paris Agreement, concluded at COP21 (Conference of the Parties) in 2015, testifies to the rise of a global dynamic that gives top priority to the rapid development of concrete solutions to reduce these emissions.

This agreement established the principles of a new international framework and set ambitious short- and long-term targets: to limit global warming to well below 2°C, ideally 1.5°C, compared with pre-industrial levels.

True to its DNA, OPmobility is determined to play a leading role in the transformation towards clean mobility. The Group has set itself ambitious emission reduction targets for the short (2025), medium (2030) and long term (2050), for both direct and indirect emissions. Its 2025 and 2030 targets are approved by the SBTi (Science Based Targets Initiative) and aligned with the 1.5°C ambitions of the Paris Agreement. OPmobility is also a member of Euronext's CAC SBT 1.5 index (comprising only SBF 120 companies whose decarbonization trajectory is aligned with the Paris Climate Agreement).

OPmobility's firm commitment to reducing its emissions by 2030 marks an important step towards longer-term neutrality, a goal examined both for its own activities, the best practices of its employees, and its value chain.

In addition to monitoring, anticipating and preparing the Group for national and international regulatory developments related to climate change, OPmobility participates in taskforces and commitment dynamics. The Group is setting objectives and proposing action plans that will enable it to follow a decarbonization path in line with the Paris Agreement.

TARGETS FOR REDUCING GHG EMISSIONS

Since 2021, OPmobility has been rolling out its carbon neutrality roadmap.

- Scopes 1 & 2 neutrality by 2025 (emissions from operations) on its historical scope².
- 30% reduction in upstream and downstream scopes 3 emissions in 2030 compared with 2019.
- Neutrality on all scopes by 2050.

ACTION PLAN

The action plan follows a structured sequence of Avoid / Reduce / Replace / Compensate and Measure.

- **Measuring** energy consumptions and CO₂ emissions to monitor and reduce the impact on global warming

² For acquisitions made in the second half of 2022, carbon neutrality for scopes 1 and 2 in 2027.

- **Avoid energy wastage** with a sobriety plan giving simple, precise instructions on how to manage the operating modes of industrial equipment, room temperatures, unnecessary lighting and eco-responsible behavior.
- **Reduce** the carbon footprint of operations by: Reinforcing the implementation of the Top Planet program
 - Reducing site energy consumption by 12% by 2025: compared to 2019
 - Deploying ISO 50 001 certification and associated energy audits.
- **Replace** fossil-based energy with renewable electricity by increasing the share of renewable electricity purchases to approach 100% by 2025 through:
 - The installation of photovoltaic panels or wind turbines on its sites
 - The signing of long-term contracts to build new production capacity, contributing to the principle of additionality.
 - Purchase of guarantees of origin for renewable electricity.
- **Reduce** emissions generated by Group purchasing and by products sold by:
 - Developing solutions and products to support customers' energy transition and reduce their carbon footprint.
 - Integrating a growing proportion of recycled materials into products.
 - Collaborating with suppliers and creating partnerships to promote innovations. Committing suppliers to reducing their CO emissions.²
- **Offset** certain residual emissions for which no economically viable solution has yet been found by financing carbon avoidance or sequestration projects related to its activities.

ASSESSING THE IMPACTS, RISKS AND OPPORTUNITIES OF CLIMATE CHANGE AND DEVELOPING A TRANSITION PLAN

In addition to the actions taken to reduce greenhouse gas emissions and help mitigate climate change, the Group considers climate change, its impact on mobility and the need to adapt to these changes as major factors to be integrated into its strategy and the development of its business model. Adapting to climate change is therefore seen as an opportunity to strengthen the resilience of its activities while meeting the changing needs of its stakeholders and the regions in which it operates.

The group is therefore committed to:

- Implementing the recommendations of the TCFD (Task Force on Climate-Related Financial Disclosures). Work is being carried out with Carbone 4 on imaginable futures to enable management to project themselves into 1.5°C, 2°C and 3°C scenarios and to consider their impact on business models.
- Strengthen the resilience of its infrastructures and activities (identification of priority sites, identification of local adaptation options to climate change).
- Anticipating the impacts of climate change:
 - Integrate extra-financial criteria into risk analysis for new projects.
 - Simulate climate change elements in the Group's strategic scenarios.
 - Assess the financial impact of climate change on industrial tools and business plans.

- Contribute to external national and international issuer-investor working groups.
- Assessing the Group's transition risk.
- Comply with and anticipate regulatory requirements for risk publication (CSRD – Corporate Sustainability Reporting Directive, taxonomy, CS3D – Corporate Sustainability Due Diligence Directive).
- Position the Group as a committed player (ACT FOR ALL program) and comply with extra-financial ratings (CDP – Carbon Disclosure Project, Ecovadis, etc.).

STABLE GOVERNANCE AND TRANSPARENT COMMUNICATION

The Appointments and CSR Committee meets several times a year to monitor CSR objectives and their deployment, notably the carbon neutrality roadmap, occupational health and safety policies, and the diversity and inclusion strategy.

The monitoring of non-financial performance is included in the calculation of the variable compensation of the Chief Executive Officer and the Deputy Chief Executive Officer. The objectives of safety, carbon neutrality and diversity are taken into account when measuring the performance of the Executive Board.

Progress on GHG emission reduction targets linked to reduced energy consumption and an increase in the share of renewable energies in energy consumption are communicated when the Group publishes its annual and quarterly results to investors.

In addition, OPmobility publishes its carbon footprint every year in its Universal Registration Document, as required by regulations.

SECTION 2 - POLLUTION



AIR, SOIL AND WATER POLLUTION

Like all industrial activities, OPmobility's operations can generate pollutants in the air, soil and water.

To remedy this, OPmobility takes action at every key stage of its development:

- During the acquisition, M&A or site construction phases, an **environmental analysis** is carried out as part of due diligence on environmental issues.
- During the product design phase, R&D teams adopt **eco-responsible practices**, ensure **compliance with the environmental regulations** to which our products are subject, and manage the **traceability of the composition** of the Group's products.
- OPmobility's industrial sites are committed to **obtaining ISO 14001 certification** and to controlling the risks of air, water and soil pollution. By 2023, **92% of sites have already been certified**, and the remaining sites are working towards certification. The Group requires the exclusive use of authorised products, accompanied by safety data sheets, and bans CMR (1A and 1B) and SVHC substances as defined by REACH, unless a specific exemption is granted. To avoid soil pollution, containers must be placed in a retention area, and manufacturers' storage and handling instructions must be followed.
- OPmobility's industrial plants aim to keep noise emissions to a minimum and implement the measures necessary to achieve this.

HAZARDOUS SUBSTANCES

Safety is a top priority for OPmobility in all areas.

With regard to the management of hazardous substances, the Group is committed to the safe storage and handling of these substances which, in the event of leakage, could endanger the soil or groundwater. The Group therefore ensures that each site is in a position to respond in the event of a hazardous situation. In addition, the use of less hazardous substances is systematically favoured.

Products that fall within the scope of the European REACH regulation must be registered. OPmobility works with an external expert to ensure that products comply with the regulations, and that safety data sheets (providing information on risks and precautions for use, for example) are up to date.

OPmobility complies with local and national regulations. Substance approval and control measures are integrated into the processes of research and development, manufacturing, use and marketing of its products.

With regard to 2023 taxonomy requirements, substance traceability tools have been adapted to the specific requirements of taxonomy regulations and are constantly being improved to take account of new substances. In addition, parts containing substances of concern are subject to specific monitoring and research into alternative raw materials.

REDUCTION TARGETS

Objectives	Target
Control all discharges of plastic pellets to avoid contamination of water and soil.	2028
Carrying out phase 1 and phase 2 environmental analyses (including asbestos surveys) for sites purchased or constructed	100% in 2030
ISO 14001 certification (2 years after SOP or acquisition)	100% in 2030
Quantity of CMR 1a and 1b in production when alternatives are possible and approved by customers	0% in 2030

ACTION PLAN

- Integrating pollution issues into business group and site policies and/or procedures
- Carrying out environmental due diligence on OPmobility's acquisitions and on the construction of its plants, to ascertain the state of the soil.
- Implementing action plans to remedy the situation in accordance with regulatory requirements.
- Measuring its atmospheric emissions and bringing its facilities into compliance.
- Verification of the efficiency of atmospheric emission abatement facilities to ensure optimum performance.
- Screening with a third-party partner of substances under development or in production to identify substances considered to be CMR or SVHC.
- Quarterly monitoring to obtain a map of the substances used and to implement corrective actions.
- Drawing up an update to date and a projected view, taking account of changes in regulations, to guarantee regulatory compliance for these substances.
- Recording the composition of products in an external database.

SECTION 3 - WATER



A LOCAL CHALLENGE

Water is essential to life and a crucial resource for industry. Aware of the growing threat of shortages, both in terms of quantity and quality, as well as the risk of conflicts linked to its use, Opmobility is committed to a process of continuous improvement in the use of water.

At Opmobility, water is a raw material that is mainly used to cool production equipment, using a closed loop system to limit consumption. It is also used in the paint lines and in the injection process. Water discharges mainly concern water used in painting processes. In this case, it is reprocessed, and the paint sludge enters the waste management circuits in compliance with regulations, and sanitary water.

Opmobility has defined water management as one of the 6 key environmental issues but is also committing its value chain to improving its water consumption, notably through the supplier charter.

Opmobility's performance in this area is assessed by non-financial rating agencies (e.g. CDP Water).

REDUCTION TARGETS

Objectives	Target
Implementation of water management plans for industrial activities in water-stressed areas	100% in 2027
Reduction in water consumption (m3)	Under evaluation for 2030

ACTION PLAN

The actions implemented by the Group consist of :

- Measuring water consumption and discharges at each site.
- Monitoring water management indicators: volumes of water withdrawn, discharged, consumed, recycled or reused and stored.
- Carry out regulatory monitoring of water quality at plant outlets.
- Identify industrial sites with high water consumption and/or subject to water stress and draw up specific action plans.
- Implement available technologies to reduce its impact on discharges (physico-chemical modifications, disruption of ecosystems).
- Take steps to ensure access to water, sanitation and hygiene in the workplace.

SECTION 4 – BIODIVERSITY



BIODIVERSITY, A CHALLENGE FOR LOCAL INITIATIVES

Biodiversity refers to all living beings and the ecosystems in which they live. It also includes the interactions of species with each other and with their environment. Humanity and its activities are part of this, as they interact directly or indirectly with living species and their ecosystems.

There is a growing awareness of the challenges facing biodiversity. This awareness is also heightened by the close relationship between biodiversity and climate issues. As a result, the importance of biodiversity is better understood and taken into account by industry.

Companies have the capacity to act in two distinct ways to preserve biodiversity: on the one hand, by reducing their dependence on natural resources, and on the other, by limiting their impact on ecosystems.

OPmobility is aware that if it is to continue to grow, it needs to pay greater attention to preserving the environment and has made biodiversity issues central to its environmental policy and processes. The Group has developed a framework that enables it to address climate and biodiversity issues and build a strategic roadmap.

REDUCTION TARGETS

Objectives	Target
Biodiversity management plan adapted to local issues - 12 sites	in 2025
Biodiversity management plan adapted to local issues - 50% of sites	in 2028
Biodiversity management plan adapted to local issues - 100% of sites	in 2030
Investigate the impact of the implementation of all new sites on biodiversity (to be systematically included in phase 1 of due diligence).	in 2030
Provision of biodiversity awareness modules for employees	in 2025

ACTION PLAN

In 2018, OPmobility formalized its commitment by joining the Act4nature initiative, which became Act4nature international in 2020. The Group has thus made 10 commitments common to all signatory companies and additional individual commitments.

In 2022, OPmobility has put in place a structured approach by carrying out a holistic inventory of OPmobility's interactions with biodiversity and quantifying the Group's biodiversity footprint in order to put in place an appropriate action plan. Firstly, all OPmobility sites were mapped in order to assess their proximity to areas of interest for biodiversity and areas of hydric stress. The Group's main interactions (dependencies and impacts) on biodiversity were then identified. Finally, a biodiversity footprint was calculated, considering modelled data from life cycle analyses and reference data on the state of biodiversity worldwide.

This study shows that the main impacts of OPmobility's activities are linked to climate change, soil transformation and pollution. They show the strong correlation between climate change and damage to biodiversity. Thus, the actions already undertaken to reduce the Group's carbon footprint (energy management, incorporation of recycled material in products, etc.) is the main contributor to the preservation of biodiversity.

The Group's actions are as follows:

- Identify sites located in protected areas.
- Carry out a variety of local initiatives to preserve water, protect life and clean up pollution.

Since 2023, the Group has also been running a campaign inviting employees to adopt everyday actions that help conserve resources and preserve biodiversity, by reducing the pressure on natural resources and minimizing environmental impacts (the 6 Environmental basics).

SECTION 5 – THE CIRCULAR ECONOMY



INNOVATION AND CIRCULARITY AT THE HEART OF OUR MODEL

The overexploitation of natural resources is a real threat for humanity. At present, we are taking far more than the Earth is capable of regenerating its resources and absorbing waste.

Developing a circular economy model is essential if we are to meet the growing need for mobility while limiting the impact on the environment. Different types of materials are used depending on the part to be manufactured, and technical and aesthetic properties are sought. In order to reduce the environmental footprint of manufactured parts and limit resource consumption, the Group is developing waste recovery management, a circular economy for its products and projects to integrate recycled materials.

The growing use of recycled materials raises new challenges for the Group in terms of the supply of recycled materials for the entire life cycle of a vehicle, and in terms of quality, cost and traceability. Indeed, eco-design -depends on the availability of innovative techniques and materials, testing and validation, and the ability of material suppliers to meet the needs of new product industrialization. Developing an eco-designed system or module -for a vehicle can take two to three years. That's why it's vital and strategic to anticipate market expectations and secure supplies.

By applying the principles of ecodesign, and adopting a global vision of the product, OPmobility implements and tests solutions to reduce the consumption of raw materials and energy, and the impact of products at the end of their life cycle (recyclability, energy recovery).

REDUCTION TARGETS

Our circular economy objectives are as follows:

Objectives	Target
Increased waste recovery	TDB
Lifecycle analysis across the organization (for all BGs) to assess the whole-life impact of products in 2025.	100% of BGs concerned in 2025
Increase in the proportion of recycled materials purchased	Specific objectives by BG

ACTION PLAN

For many years, OPmobility has been involved in several initiatives to promote the circular economy as part of its integrated offering:

- The Top Planet programme, initiated in 2006, and the ISO 14 001 certifications aim to reduce the environmental impact of production in its plants, by making sorting and recycling more efficient, and to promote the circular economy by recovering waste with a view to reducing non-recovered waste as much as possible. In addition, some internal production waste is reintegrated into the manufacturing process whenever technically possible in order to reduce the volume of waste generated.
- Major work on life cycle analyses (LCA), with the acquisition of several GaBi software licences and the training of employees in various departments to meet this need. The aim of the complete LCA project is to improve efficiency and accuracy.
- The reuse of materials, recyclability and the end-of-life of projects are key areas of optimisation for OPmobility. The Group is working to comply with the European regulation on the inclusion of recycled materials in vehicles by 2030, in particular by designing products in a more sustainable way.
- OPmobility launched the Sustainable Materials project in 2023, the aim of which is to secure the Group's supply of recycled materials to meet the needs of each business group in terms of the quality, quantity and timescales required by manufacturers and in accordance with current regulations.
- The Group also works actively with its raw materials suppliers to reduce its carbon footprint.
- Numerous eco-design and eco-conception efforts are carried out with the aim of developing products that guarantee the best possible environmental balance. Sigmatech has set up a dedicated inter-Business Group team to encourage these practices.