October 2026

HUMAN RIGHTS POLICY

OPmobility is committed to respecting and promoting Human Rights in all countries where the Group operates, in accordance with internationally recognized principles, including the United Nations Global Compact. This commitment includes ensuring employees with safe, healthy and dignified working conditions, respecting fundamental freedoms, and ensuring remuneration that complies with applicable legal requirements and relevant local standards.

This Policy formalizes the Group's Human Rights commitments and specifies the principles applicable to its relationships with employees, business partners, suppliers, local communities and other stakeholders. It aims to govern the prevention, identification, mitigation and, where appropriate, remediation of adverse impacts that may be linked to the Group's activities or its value chain.

This Policy is public and is reviewed regularly under the responsibility of the Global HR Labor Relations Director, in coordination with the relevant functions.

1. PURPOSE AND SCOPE

This Policy sets out the principles applicable to Human Rights within the Group and defines OPmobility's expectations in its relationships with employees, business partners, suppliers, local communities and other stakeholders.

It covers, in particular, the prohibition of child labour and forced labour, freedom of association and the right to collective bargaining, non-discrimination, equal opportunities, fair, safe and dignified working conditions, as well as remuneration that complies with applicable legal requirements.

It is based on the Group's policies and charters, including the Code of Conduct, the Supplier Charter and the Vigilance Plan. It applies to all Group entities and subsidiaries and also covers, where relevant and in line with OPmobility's level of control or influence, joint ventures, business partners, temporary workers, service providers, suppliers and subcontractors.

2. HUMAN RIGHTS COMMITMENTS

OPmobility is committed to complying with internationally recognized Human Rights standards and to respecting their principles, including:

- United Nations Global Compact,
- United Nations Universal Declaration of Human Rights and its complementary covenants,
- Fundamental conventions of the International Labour Organization (ILO),
- ILO Declaration on Fundamental Principles and Rights at Work,
- OECD (Organization for Economic Co-operation and Development) Guidelines for Multinational Enterprises on Responsible Business Conduct,
- United Nations Guiding Principles on Business and Human Rights (UNGPs),
- United Nations Sustainable Development Goals (SDGs).

This Policy also contributes to the implementation of the minimum safeguards provided for under Article 18 of the Taxonomy Regulation, relying on these procedures and due diligence processes.
This commitment is reflected in particular in the **Code of Conduct**, which sets out the non-negotiable rules regarding respect for Human Rights, fundamental freedoms and social dialogue, as well as the requirements applicable to health and safety, environmental protection, diversity, the prevention of harassment and the fight against all forms of discrimination. It also reiterates the principles relating to fair competition, the prevention of corruption and the fight against influence peddling.
OPmobility also publishes a **Vigilance Plan** that applies to the Group's operations and its value chain.

OPmobility has structured its commitments through the global **ACT FOR ALL™** program, which is built around three pillars:

- **Act for People**: OPmobility strives to provide safe, healthy and fair working conditions for all its employees.
- **Act Responsibly**: OPmobility promotes the highest standards of conduct, making ethics a cornerstone of its responsible performance.
- **Act for Planet**: OPmobility acts to preserve the environment by reducing the impact of its activities and promoting eco-design and clean mobility.

The **Supplier Charter** specifies how suppliers must comply with the Group's responsible purchasing approach. This policy reflects the Group's commitment to the following principles:

- Prohibition of child labour,
- Prohibition of forced labour and freedom of employment,
- Freedom of association and the right to collective bargaining,
- Non-discrimination and equal opportunity,
- Remuneration in compliance with applicable laws and prevailing local standards,
- Compliance with applicable rules relating to working hours, rest periods, and health and safety,
- Prevention of harassment, violence, inhuman or degrading treatment, and any violation of human dignity,
- Respect for privacy, protection of personal data, and the rights of data subjects.

This policy is also aligned with the Group's CSR commitments.

3. GOVERNANCE AND IMPLEMENTATION

The implementation of this Policy is supported by dedicated governance, operational processes, and global application across the Group, while taking into account local legal requirements without prejudice to the Group's commitments.

OPmobility implements a human rights due diligence approach designed to identify, prevent, mitigate, and monitor risks of adverse human rights impacts arising from its activities, those of its subsidiaries, and, where relevant, its value chain. Where adverse impacts are identified, the Group implements or supports appropriate remediation measures.

This approach includes, depending on the risks identified, the assessment of actual and potential impacts, the integration of findings into internal processes, the monitoring of the effectiveness of measures taken, and, where appropriate, communication with relevant stakeholders.

3.1 Governance, Due Diligence

The governance of this Policy is based on the following bodies:

1. The **Internal Control and Compliance Committee** is composed of representatives from the Human Resources and Sustainability, Finance, Compliance, Risk and Internal Audit, and Legal Departments, as well as the CEOs of the business goups. It guides the Group's policies and actions and is supported by a network of Regional Compliance Leaders, as well as local Compliance Representatives and Privacy Legal Correspondents worldwide.
2. The **Audit Committee**, which reports to the Board of Directors, reviews the deployment of the Group's compliance and anti-corruption programme.
3. The **Appointments and CSR Committee**, which is part of the Board of Directors and composed of three members, reviews, among other matters, the Group's environmental, social and societal responsibility issues and provides the Board with an opinion on the non-financial performance statement required under Article L.225-102-1 of the French Commercial Code.

3.2 Implementation

3.2.1 Code of Conduct

The Code of Conduct, which is regularly updated and translated into all Group languages, formalizes the commitments of OPmobility and its employees. It defines the principles and non-negotiable rules applicable throughout the Group regarding Human Rights, fundamental freedoms and social dialogue. It sets out the rules of conduct relating to health and safety, environmental protection, diversity, and the prevention of and fight against harassment and all forms of discrimination. It also recalls each employee's obligations regarding the protection of the Group's image and assets, product quality and safety, and compliance with applicable ethical, legal and regulatory requirements. The Code of Conduct has been issued since 2003 and was last updated in 2026. It contains two sections:

- OPmobility's commitments and obligations towards its employees;
- Employees' commitments and obligations towards OPmobility.

It also describes the professional whistleblowing mechanism, which is governed by a dedicated procedure.

3.2.2 Vigilance Plan

French Law No. 2017-399 of 27 March 2017 on the Duty of Vigilance of parent companies and ordering companies, applying to parent companies of groups employing more than 5,000 employees in France, or more than 10,000 employees worldwide, to establish, publish and implement appropriate measures to identify risks and prevent adverse impacts on Human Rights and fundamental freedoms, the health and safety of individuals, and the environment that may result from the activities of the Group and its subsidiaries, as well as from those of suppliers and subcontractors with whom the Group maintains an established business relationship.

OPmobility complies with the requirements of the French Duty of Vigilance Law through the implementation of a Vigilance Plan, which outlines the actions and measures deployed in relation to the following areas:

- Human rights and fundamental freedoms;
- Health and safety;
- Environmental protection;
- The value chain.

A vigilance risk mapping and a report on its implementation are incorporated into the Vigilance Plan published in the Universal Registration Document. The scope of this assessment covers the Group's subsidiaries as well as its suppliers, service providers and subcontractors (the "Suppliers").

3.2.3 Training

Employees are regularly made aware of and trained on the Group's commitments in order to ensure a consistent understanding of both their own responsibilities and those of the Group, and to support their effective implementation in all countries where OPmobility operates.

The **Code of Conduct e-learning module** is intended for employees, including permanent and fixed-term employees, international corporate volunteers (VIEs), interns and apprentices. It is currently available in 22 languages.

The **Anti-Corruption e-learning module** is mandatory for all engineers and managers within the Group, as well as for all employees working in the Purchasing, Sales, Logistics and Finance functions. It is available in 22 languages. Based on practical case studies reflecting the risks encountered in the various countries where the Group operates, the training aims to help participants identify, prevent and appropriately manage situations that may constitute acts of corruption or influence peddling.

3.2.4 ACT FOR ALL™ Program

The ACT FOR ALL™ program, designed to engage its stakeholders, including local communities, is implemented through concrete initiatives deployed at all levels of the organization. Achievement of its objectives is measured through dedicated indicators.

4. HUMAN RIGHTS IN THE VALUE CHAIN

The **Supplier Charter** applies to all OPmobility suppliers and forms part of the contractual or pre-contractual documentation communicated during procurement processes. By adhering to it, suppliers undertake to comply with its principles, implement them within their own organization, and promote their observance among their own suppliers and subcontractors.

In addition, suppliers are subject to systematic individual assessments as part of the Know Your Supplier ("KYS") process and, more broadly, within the framework of the third-party compliance assessment conducted annually.

From a governance perspective, a dedicated committee, the Supplier Compliance Committee, meets at least three times a year to ensure the proper functioning of the KYS process and to validate remediation measures affecting the highest-risk suppliers.

As a supplier itself, OPmobility undergoes an annual assessment conducted by recognized industry organizations such as EcoVadis.

Where its activities may affect local communities, OPmobility takes into consideration their rights and legitimate interests, particularly with regard to health, safety, the environment and access to essential resources.

5. ALERTS, MONITORING AND POLICY REVIEW

The Group provides a whistleblowing mechanism accessible to employees and relevant stakeholders to report any violation of the law, including acts of corruption, fraud, conflicts of interest, anti-competitive practices, any breach of the public interest, and any situation contrary to the Code of Conduct that constitutes a serious Human Rights risk, including discrimination or harassment, disrespectful behaviour, or situations affecting health, hygiene, workplace safety or the environment.

5.1. Whistleblowing Procedures

Reports may be submitted through a dedicated whistleblowing mechanism, available at all times. This mechanism is open to corporate officers, employees (current and former), interns, temporary or seconded workers, job applicants, shareholders, and all OPmobility stakeholders, including suppliers, customers and their employees.

Reports may be submitted anonymously. They are handled confidentially and impartially, in compliance with the rights of the persons concerned, the protection of personal data, and the prohibition of any retaliatory measures against whistleblowers acting in good faith.

A specific formalized procedure sets out the conditions governing the implementation of the whistleblowing mechanism.

The Compliance Department reviews reports, determines their admissibility, appoints investigators, where appropriate including external investigators, and monitors their progress until deciding on their closure.

Where allegations are substantiated, corrective measures are implemented by the Group. In addition, an Ad Hoc Committee, which is regularly informed, oversees and handles the most sensitive reports. It is composed of representatives from the Compliance, Human Resources and Internal Audit departments.



5.2. Monitoring and Review of the Policy

The Human Rights Policy is reviewed periodically under the supervision of the Compliance and People & Sustainability departments. This review takes into account, in particular, reports received through the whistleblowing mechanism, lessons learned from their handling, the results of due diligence processes, legislative and regulatory developments, as well as significant changes affecting the Group's activities or its value chain.

6. REFERENCE DOCUMENTS

Code of Conduct:	It defines the expected standards of conduct for all Group employees and partners, as well as OPmobility's commitments in terms of ethics, respect for Human Rights, integrity and responsible business conduct.
Vigilance Plan:	It presents the measures implemented by OPmobility to identify, prevent and mitigate risks relating to Human Rights, health and safety, the environment and ethics within its operations and value chain.
Supplier Charter:	It defines OPmobility's expectations of its suppliers regarding responsible and sustainable business conduct, incorporating the ethical, social, environmental and Human Rights principles that the Group seeks to promote throughout its value chain.
Global Compact Commitment:	As a signatory of the United Nations Global Compact, OPmobility is committed to aligning its strategy and operations with the universal principles relating to Human Rights, labour, environmental protection and anti-corruption.
Whistleblowing Policy:	It describes how employees, temporary workers, service providers and other OPmobility stakeholders may report, in complete confidentiality and without risk of retaliation, any suspected ethical misconduct or inappropriate behaviour, as well as how such reports are handled by the Group.

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REVISION HISTORY (LAST 3 CHANGES)				
Date	Index	Author	Validated by	Approved by
01/04/2024	A: Document creation	**Camille VARIN** Global EHS CSR Manager	**David MENESES** Executive VP People & Sustainability	**Laurent FAVRE** Chief Executive Officer
06/05/2025	B: Document update	**Camille VARIN** Global EHS CSR Manager	**David MENESES** Executive VP People & Sustainability	**Félicie BURELLE** Chief Executive Officer
25/09/2026	C: Document update	**Laure BOMO** Global HR Labor Relations Director **Camille VARIN** Global EHS CSR Manager	**Damien DEGOS** Senior VP Compliance **David MENESES** Executive VP People & Sustainability	**Félicie BURELLE** Chief Executive Officer
Scope	Group + Business group			