# 3. Non-Financial Information Statement

3.1.	Social and societal issues	39
3.1.1.	Information on employment and working conditions	39
3.1.2.	Information of a societal nature	41
3.1.3.	Main social risks	43
3.2.	Environmental Issues	46
3.2.1.	Risk mapping	48
3.2.2.	Other Information	51
3.3.	Issues relating to the respect of human rights	56
3.4.	Issues related to the fight against corruption and tax evasion	57
3.5.	Duty of care plan	58
3.5.1.	Governance	58
3.5.2.	Riskassessment	58
3.5.3.	Mitigation measures	61
3.5.4.	Next steps	61

**Reasoned opinion on the conformity and sincerity of the Non-Financial** 62 Information Statement Improvement of key performance indicators (KPI) constitutes an objective in itself for all Group entities. The information contained in the NFIS relates to all Group entities.

## 3.1. Social and societal issues

#### 3.1 / 1 Information on employment and working conditions

#### **Employment**

At 31 August 2023, Trigano employed 10,477 people (full-time equivalents, including temporary staff), an increase of 39 people over the year (+0.4%).

Date	Workforce at end of period	Variation
2020/2021	10,021	+16.6%
2021/2022	10,438	+4.0%
2022/2023	10,477	+0.4%

The average number of employees including temporary staff is 10,640, excluding temporary staff of 9,922 FTEs (Full-Time Equivalent).

At 31st August 2022, 87.0% of employees held permanent contracts. The use of temporary staff guarantees the flexibility necessary for the seasonal activity of the various entities.

#### **Breakdown of the workforce**

#### By geographical area

Trigano's workforce is spread over 14 countries, with 38.0% of the workforce (3,982 employees) based in France, in line with the Group's history.

#### By activity

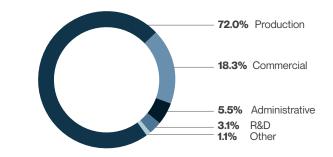
The Leisure Vehicles business employed 8,519 people as at 31st August 2022 (81.3% of the workforce), the Leisure Equipment business had 1,885 employees (18.0% of the workforce) and the Parent Company 73 employees (0.7%).

#### By socio-professional category

Given the nature of the Group's activities, the majority of the workforce is blue-collar workers who represent 59.9% of the total workforce. Employees, technicians and supervisors together represent 32.2% of the workforce and the management rate is 7.3%. Trainees and apprentices represent 0.6% of the Group's workforce.

#### **By function**

72.0% of the workforce works in production (54.9% in direct labour and 17.1% in production structures).



#### **By** age

The age pyramid, calculated on the population on permanent contracts, shows a fairly homogeneous distribution of the workforce in the different age groups between 30 and 59 years old. Employees under 30 years old represent 13.6% of the total workforce; over 50s represent one-third of staff (i.e. 3,018 people, of which 1,610 aged over 55).

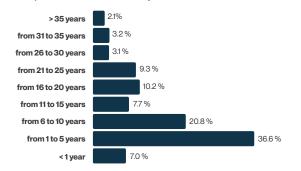
The average age is 43.2 years (43.4 years last year).



#### **By seniority**

The average length of service is 10.5 years (compared to 10.4 years the previous year).

43.6% of employees have been with the Group for 5 years or less, 28.5% have been with the Group for between 6 and 15 years and 27.9% have been with the Group for more than 15 years.



#### **By gender**

Trigano employs 2,863 women, representing 27.3% of the total workforce (same as the previous year). Generally speaking, women are not very present in the leisure vehicle assembly or trailer manufacturing trades (plumber, carpenter, electrician, welder, mechanic, etc.). However, the proportion of women employed by Trigano is higher than in the metalworking industry as a whole (e.g. 26% in France – Source: UNEDIC, Insee).

#### **Recruitments and dismissals**

During the 2022/2023 financial year, 1,691 new employees joined the Group, representing 17.0% of the average workforce excluding temporary staff.

At the same time, Trigano recorded 1,585 departures, equating to 16.0% of its average workforce. Resignations are the most frequent reason for leaving the company (39.3%), followed by the end of fixed-term contracts (37.0%), redundancies for personal or economic reasons or contractual terminations (12.3%), retirements (6.8%), and the end of trial periods (3.9%).

#### **Change in remuneration**

In France, the sites concerned by the Mandatory Annual Negotiation (NAO) represent more than 80% of the workforce. Negotiations having been completed during the financial year led to the attribution of increases ranging from 2.0% to 7.0%.

At some sites, employee remuneration is supplemented by bonuses and statutory profit-sharing.

In most of the foreign subsidiaries, salary increases were similar.

#### **Organization of working time**

Production staff usually work day shifts. However, so as to deal with the seasonal nature of business, and increased costs of orders for certain product ranges and resupplies, some entities use night-shirt or team-work on an ad hoc basis.

The average working week is generally between 39 and 40 hours in Europe; in France it is 35 hours with agreements on flexible working hours.

During the financial year, around 379,000 hours of overtime were worked (2.1% of hours worked). This volume of hours is mainly related to one-off increases in activity.

In particular, the Group's entities managed to adapt their work organisation in the face of identified shortages of raw materials (bearers, timber, components, etc.) by managing staff according to the company's needs, using furlough arrangements.

#### **Social relations**

#### Organisation of social dialogue

In addition to strict compliance with legislation, Trigano ensures the smooth running of social dialogue with employee representatives through the various bodies present on the sites.

Local management is made aware of the importance of maintaining quality social dialogue.

## Assessment of collective bargaining agreements

The last financial year saw the negotiation of 48 new collective agreements (pay, working hours, etc.). These agreements are likely to maintain good working conditions and contribute to the economic performance of the company. In addition, meetings at the request of staff representatives with senior management enable constructive relations to be developed.

## 3.1.2. Information of a societal nature

#### Territorial, economic and social impact of the Company's activity

Trigano is a European group with the majority of its workforce outside France (62.0%).

Trigano nevertheless remains firmly rooted in France, with 33 production, logistics and distribution sites (out of a total of 65), a presence consolidated by the acquisitions made in leisure vehicle distribution in 2022. Activities remain concentrated in two major geographical areas (Auvergne-Rhône-Alpes region and Pays de Loire).

The group has been established in Auvergne-Rhône-Alpes since the transfer in 1974 of the production of Caravelair caravans to Tournon-sur-Rhône (Ardèche). This site then developed with the creation of the motorhome activity and has 1,014 people on 31st August 2022. It is Trigano's second-largest site in terms of workforce. Trigano has developed its business in this region with 9 production and logistics sites with a total workforce of 1,518 people (14.5% of total workforce as at 31st August 2022) a rise of 15 FTE positions during the financial year.

In the Pays de la Loire region, Trigano has expanded from the Mamers site (Sarthe), with 10 production sites and a workforce of 834 (7.9% of the total).

Abroad, Trigano has 32 production and logistics sites. Trigano is located in Italy (mainly in Tuscany) and employs 1,781 people (17.0% of the total workforce).

The total workforce in the United Kingdom stands at 697 people (6.6% of the total workforce) across two production sites, two accessory distribution sites, thirteen sales outlets and one commercial branch.

Through its Adria subsidiary, Trigano is one of the main employers in Slovenia. The Group has five production sites there (two motorhome and caravan manufacturing plants, a mobile home manufacturing plant and an industrial joinery plant). Adria has a workforce of 2,060 people (2,004 in Slovenia), including 1,292 for Adria Mobil, Trigano's largest site.

Nearly all employees in France and abroad, including managers, come from the local population, which enables the development of the local economic and social fabric.

As Trigano favours purchases in countries close to its production sites for greater supply flexibility and lower carbon footprint, 96% of the group's purchases are made within the European Union and the United Kingdom.

#### Consideration of societal challenges in the Group's purchasing policy

The group has long-term partnerships with its suppliers and subcontractors due to the regulatory constraints applicable to components, particularly the weight and safety standards of vehicles. Consequently, long-term purchase contracts are signed with car manufacturers, with the lifetime of a chassis model being approximately 14 years.

For strategic purchases, framework contracts are signed at Group level. Framework and local application contracts are signed by subsidiaries with their main suppliers.

All purchases are subject to compliance with Trigano's ethics charter and anti-corruption code of conduct. All our suppliers have been made aware of our principles of probity and ethics, and have been asked to sign our ethics charter and anti-corruption code of conduct (over 4,200 copies have been sent out). In addition, suppliers have been informed of the availability of a secure whistleblowing system.

The clauses of the purchase contract will be strengthened as part of the anti-corruption system and checks on compliance with these clauses will

be carried out regularly. To this end, the periodic questionnaires used to check suppliers' commitments have been expanded to focus on environmental policy, ethics (in particular human rights and the fight against corruption) and sustainable development. They were sent to suppliers representing 95% of the total value of purchases, with the suppliers who responded representing 74% of the total.

Chassis suppliers still accounted for a predominant share of global purchases this year, with just over 40%. They are highly committed to CSR, communicating their code of conduct and regularly reporting on their commitments in terms of ethics, the environment and anti-corruption. Their adherence to international standards and their evaluations by independent bodies are a guarantee that their commitments will be respected.

In addition, as Trigano now qualifies for the threshold of application of Law No. 2017-399 of 27 March 2017 on the duty of care of parent companies and contracting companies with respect to their subsidiaries and their subcontractors and suppliers in order to prevent serious violations of human rights and fundamental freedoms, the health and safety of individuals and the environment, it has drawn up a duty of care plan in accordance with the regulations presented below in section 3.5. of the Non-Financial Information Statement.

## Relationships with persons or organizations interested in the company's activities

Trigano is a major economic player in the main countries where it operates.

Trigano is actively involved in the animation and leadership of trade unions representing the interests of Leisure Vehicle manufacturers (camper vans, caravans, mobile homes and trailers). Abroad, some managers of Trigano subsidiaries also hold positions in national unions, notably in Italy (APC - Associazione Produttori Caravan e Camper), the UK (NCC - National Caravan Council) and Germany (CIVD - Caravaning Industrie Verband).

In France, the quality and/or production managers of the subsidiaries actively participate in working groups for the development of AFNOR standards relating to the products manufactured or distributed on their sites.

Finally, the various sites are in contact with the Regional Directorates for the Environment, Development and Housing for all matters relating to compliance with regulations aimed at protecting the environment and maintain regular contact with the public authorities (Prefectures, Town Halls, Departmental and Regional Councils).

Thus, constant relations are maintained with the public authorities on all matters affecting the group's activities.

Group companies play an important role in the regions in which they operate. Consequently, in Tournon-sur-Rhône (Ardèche), Trigano VDL participates in the local economic life of the association and is involved in an association bringing together industrialists from the industrial and leisure vehicle sector to promote the influence of this sector and initiate discussions on various projects (quality certification, industrial waste management, etc.).

Trigano VDL as an approved training organisation provides training for dealer staff and car insurance experts. A total of 13 trainees were trained, with a total of 182 hours of training.

Factory visits are regularly organised for students, potential customers or motorhome clubs.

In Italy, through its subsidiaries Trigano Spa, Trigano Servizi and SEA, Trigano has nurtured regular contact with universities and local schools. It regularly welcomes trainees for end-of-study internships and in 2022/2023 participated in meetings organised by schools to present Trigano's activities and to arouse students' interest in our businesses. In accordance with the terms in the national collective bargaining agreements concerning the continuous training of staff, several sessions were organised during the year to allow beneficiaries to increase their professional skills.

In Serbia, Trigano Prikolice implemented training sessions for welding staff to deal with the shortage of skilled workers in this area.

## 3.1 / 3 Main social risks

#### **Risk mapping**

Trigano periodically maps its social and societal risks. The latest study, based on interviews with members of management at the main production sites representative of Trigano's geographical location, identified the following social risks.

The main social risks identified by the business units are as follows:

- retirement / resignation of key persons;
- the shortage of manpower;
- the difficulty in attracting and retaining key skills;
- absenteeism.

#### **Developing skills**

Trigano attaches great importance to the training of its employees and considers the strengthening of its staff's skills as a lever for improving quality, efficiency and competitiveness.

Trigano ensures that all employees, whatever their age or position, have access throughout their career to the training actions necessary to build their career path and adapt to changes in the professions.

The objectives are as follows:

- meet the requirements of the markets and the group's strategy in the areas of production, safety, continuous improvement and quality;
- continuing to offer professional training;
- improving career paths;
- promote the integration of new recruits;
- raising staff awareness of safety and environmental issues;
- to accompany the people concerned by the evolution of financial, industrial and commercial management tools.

On the basis of the procedures and actions in place, the risk mapping shows Trigano's limited exposure to social and societal risks. The perception of risks by the business units has been integrated into a broader perspective at the level of General Management.

The identification of these risks is of course still ongoing and is an integral part of the work required by the duty of care plan (see 3.5).

Consequently, Trigano observed the following primary risks: skills development, occupational health and safety and absenteeism, for which a policy, actions and key performance indicators have been defined. These are indicators which Trigano continues to monitor carefully.

In 2022/2023, after two years impacted by Covid, training was rolled out to reach a number of people trained and a training cost 20% higher than in 2019 over the full financial year.

The internal training institute open at Trigano VDL continued to operate so as to train staff and new recruits in products and assembly techniques (safety, dojos, etc.). A total of 150 training courses were dispensed, representing 860 people trained and a total of 4,789 hours of training.

These courses are run by three full-time in-house instructors, assisted by in-house contributors on specific topics (safety culture, environment, gestures and postures, hoists, forklift truck driving, stacker handling, etc.), which means they can be perfectly adapted to the company's needs and are highly flexible in terms of organisation.

In addition, there are two days of "integration training" for new hires: a total of 3,920 hours of training were given in 45 courses, allowing 560 people to be taught about quality, handling tools and equipment, and basic business techniques.

Other training sessions have been implemented in partnership with Pôle Emploi and various local authorities in order to have a trained workforce for certain professions in shortage or under stress (seamstresses, forklift drivers, welders, technicians, etc.).

In addition, particular attention is paid to the implementation of training needs identified during individual and professional interviews and more particularly to junior and senior employees who may encounter difficulties in their job or in their work context.

Finally, in 2022/2023 Trigano actively pursued its contribution to the integration of young people into the job market by allowing students to come and discover the company and its businesses through internships or apprenticeships.

A key performance indicator relative to the number of training hours per person, calculated on the average number of employees excluding temporary staff is monitored closely to measure efforts made in terms of training. In 2022/2023, it is 8.2 hours per person, compared to 7.6 hours last year and 5.5 hours in 2020/2021. Over this fiscal year, more than 82,000 hours of training were provided (73,000 hours in 2021/2022) to 8,299 employees (84.6% of the average workforce excluding temporary staff compared to 79.1% in the previous fiscal year).

#### **Ensuring safety and health at work**

The business units, in collaboration with the social partners and external bodies concerned, are responsible for ensuring the health and safety of each employee. French companies, which are required to set up a Health, Safety and Working Conditions Committee (CSSCT), fulfil their obligations and actively support this body. Similar provisions exist in most of the countries where Trigano operates.

The actions carried out include, in particular, the implementation on the sites of workstation layout to improve equipment, working conditions and workstation ergonomics, the installation of lifting equipment, reinforced monitoring of the wearing of PPE (Personal Protective Equipment), analysis of the causes of workplace accidents and the implementation of corrective actions, and team training.

In 2022/2023, 844 occupational accidents were recorded in the group, of which 321 did not result in any work stoppage. These accidents generated 113,699 hours of downtime, equating to 6.7% of the hours of absence. The number of workplace accidents was down slightly by 1.6% compared to the previous year (858).

In France, a procedure aimed at inspecting workplace accident declarations was implemented so as to better control incidents and implement a claims procedure where necessary.

The effect of the policies rolled out over the last few years is measured by particular attention of the group to two key performance indicators:

- The rate of frequency of workplace accidents;
- The rate of severity of workplace accidents.

The frequency rate (number of work-related accidents with lost time x 1,000,000 / actual hours worked) is 29.9 (28.9 in 2021/2022) and 48.0 for the number of work-related accidents with and without lost time (47.0 in 2021/2022).

The severity rate (number of days of downtime x 1,000 / number of actual hours worked), which represents the number of days lost due to a workplace accident per thousand hours worked, was 0.81 for the year (0.89 in 2021/2022).

In business units where the frequency rate appears to be quite high, further investigations are carried out to understand the causes and take corrective actions to significantly reduce it.

Particular attention is paid to the detection of cases of occupational illness. In 2022/2023, 14 new cases were identified bringing the total number of cases to 93.

The "health & safety at work guarantee" was a particular central point of Trigano concerns during the Covid-19 pandemic. Once more this year, throughout the FY, business activities continued in respect of the restrictions in force in each respective country. The production lines were redeveloped and adjusted to take account of social distancing requirements to be respected between operators. These social distancing rules were rolled out across all operations and business sectors. Posters were widely displayed as a reminder of good practices throughout all premises. Various items of safety equipment (masks, hand sanitiser, plastic separators, increased cleaning of premises, etc.) were supplied to all members of staff.

#### Limiting absenteeism

The fight against absenteeism is considered a priority by Trigano because unplanned staff absences are a source of workshop disorganization, productivity losses and deterioration in the quality of the working environment.

In order to effectively combat absenteeism, a key performance indicator relating to the absenteeism rate is regularly analysed by site management. In addition, an annual analysis of the causes of absenteeism is carried out.

In 2022/2023, the absenteeism rate reached 11.8% for the Group as a whole (10.3% without the impact of maternity leave), up from previous years (9.5% in 2021/2022). This year again, the deterioration is mainly due to the sick leave of staff directly affected by Covid.

This rate remained higher than the nationally observed rate. According to figures known for 2022, the rate observed across all business sectors in France was up (6.7% in 2022 and 6.2% in 2021, Source Ayming 2023 barometer).

A policy to improve working conditions continues to be put in place and takes the form of the following actions:

- the renovation and fitting-out of production sites;
- the reorganization of work stations;
- the improvement of social facilities;
- the purchase of equipment to make workstations less arduous;
- training for managers and teams in management, gestures and postures, and safety.

These actions are carried out in consultation with staff representatives in order to reduce the absenteeism rate and bring it into line with that of the private sector observed at national level.

Other measures are being taken by entities to reduce the volume of hours lost due to absenteeism:

- communication actions are implemented to raise awareness among staff and elected officials of the impact of unplanned absences on production cycles;
- interviews are conducted after long-term absences in order to identify levers of progress to prevent further absences;
- medical check-ups are organised for any absence of more than 60 days.

## **3.2. Environmental Issues**

The preservation of nature and respect for the environment are among Trigano's fundamental values, which have long been part of its corporate culture and are inseparable from the company's activities, which have been focused on outdoor leisure activities for nearly 90 years.

The Company's manufacturing activities primarily consist of assembly of components which have a low environmental impact.

Trigano places a great deal of focus on the continued improvement of its carbon footprint for use of its products, notably favouring its primary activities of leisure vehicles, by using motorhome chassis which are fitted with the very latest technology to reduce emissions.

#### Green taxonomy

In accordance with European Regulation 2020/852 of 18 June 2020 (the "Taxonomy" Regulation) published by the European Union (EU) regarding the establishment of a framework intended to encourage sustainable investment in the EU, Trigano has undertaken an analysis of its activities across its consolidated entities so as to identify which entities are eligible, as well as individual operating expenses (OPEX) and capital expenditure (CAPEX) where applicable.

As a result of the necessary alignment with IFRS financial ratios, Loisirs Finance, in which Trigano exercises significant influence, is excluded from the calculation of the ratios defined by the delegated act of the Taxonomy regulation.

#### Identification of eligible activities

In the framework of the aforementioned European environmental regulation and the classification system of business activities in line with the associated sustainability criteria, Trigano has conducted an assessment of all of its primary business activities in light of the clearly defined list of business sectors under the annexes of the EU Supplementing Regulation 2021/2139 of 4 June 2021 aimed at mitigating climate change (Annex 1) and adapting to climate change (Annex 2).

Although extremely detailed, the supplementing regulations on taxonomies published do not however include any precise definition of rules to determine the eligibility of "special-use vehicle" manufacturing activities, a category which notably includes motorhomes and caravans (80% of total sales recorded by Trigano in 2022). The regulations only make reference to the manufacture of "transportation vehicles". And yet, in accordance with article R111-47 of the Urban Planning Code, motorhomes are classed as a caravan which are special-purpose vehicles (SPVs\*), land-based, and habitable, and intended for temporary or seasonal occupancy, in leisure activities, and which permanently retain a mobility purpose. At this stage of understanding of the regulations by Trigano, the motorhome and caravan manufacturing activities do not fall in the framework of manufacturing activities of "transportation vehicles" as defined by the European environmental regulation.

Trigano has therefore drawn the conclusion that its primary economic activities are not covered by the supplementing regulation regarding climate change and are not consequently eligible for the taxonomy.

## Methodology for calculating key performance indicators

Due to the absence of any eligible sales volumes, the OPEX and CAPEX attached to the primary economic activities undertaken by Trigano cannot be classed as eligible. Consequently, analysis of the eligibility of CAPEX and OPEX exclusively focused on "individual measures" allowing target activities to become "low carbon" or to lead to reduced greenhouse gas emissions, as defined in the EU Taxonomy Regulation.

OPEX comprises direct non-capitalised costs relating to research and development, building renovation work, short-term leases, maintenance and repairs, and any other direct expenditure relating to the day-to-day upkeep of tangible fixed assets. The analyses led to the conclusion that the OPEX ratio was not material (i.e. less than 5% of Trigano's consolidated operating expenses), the exemption criterion was applied and the eligible OPEX key performance indicator was not calculated.

<sup>\*</sup> Specialist Automotive Vehicles with total authorised laden weight equal to or less than 3.5 tonnes.

CAPEX includes the acquisition of intangible and tangible fixed assets, the acquisition of rights of use and assets related to business combinations. For 2023, the total amount of CAPEX stood at 76.4 million euros (o/w €19.1m. by virtue of the IFRS 16 standard).

Trigano's eligible CAPEX primarily concerned the acquisition of rights of use over real-estate lease agreements and the acquisition of buildings (attached to activity 7.7 Acquisition and property of buildings resulting from annexes I and II of the Climate Supplementing Regulation). They also include an increasing share of investments that individually contribute to improving the company's environmental performance, such as solar panels or heat pumps.

In 2023, the eligible Capex ratio was 40.0%.

#### General environmental policy

Trigano's environmental protection policy is rolled out over two primary areas:

 the development of products which increasingly respect nature with, notably, the search for reducing weight, energy use and carbon footprint of vehicles as well as the use of recycled or recyclable materials and packaging;

#### Calculation of key performance indicators

Trigano's consolidated sales and total CAPEX can be reconciled with the income statement and cash flow statement (acquisition of intangible and intangible fixed assets) respectively in section 4 of this annual report.

	Total 2023 (in €m)	Share of primary equation of primary equation of primary equation of the second state	
Sales	3,480.2	0.0 %	100.0 %
OPEX	cri	terion of non-material	ity applied
CAPEX	76.4	40.0 %	60.0 %

2. The search for and implementation of best practices with particular emphasis on reducing the environmental impact of the various discharges and resources used, reducing the production of hazardous and non-hazardous waste, energy efficiency, the development of the circular economy and the use of renewable energies.

#### Organisation of the company to implement its environmental policy

General Management is directly coordinating the group's environmental policy relying on site managers and a consultancy firm. Since 2002, it has developed a supervision tool for quantitative and qualitative environmental data oversight, on the basis of Key Performance Indicators (KPI).

Improvement of these KPIs is a key objective for all group entities. The consultancy firm has the assignment of collating, inspecting, approving and consolidating the environmental data so as to guarantee its reliability and assisting in analysis.

Permanent internal oversight concerning environmental regulations has also been implemented to contribute towards the continuous improvement of the Group's environmental policy. Information, guidance and environmental performance reports are regulatory issued to site managers on which to base their action plans.

Each year, General Management selects several sites on which environmental audits and environmental data reviews are to be conducted by Trigano's in-house auditing team.

Finally, since December 2021, an Energy Transition Director has been leading and coordinating work on the energy transition for leisure vehicles.

### 3.2.1. Risk mapping

Trigano undertakes as-needed risk mapping of environmental risks related to all industrial production activities undertaken across its many sites. The risk map drawn up in 2019/2020 confirmed limited exposure of the group to this type of risk due to the nature of its industrial production activities.

Administrative sites with no significant environmental impact are not included in the scope of this report.

Three environmental risk monitoring indicators have been identified:

- A. Water use;
- B. Energy use;
- C. Recycling rate of non-hazardous waste.

#### A - Water use

Water is primarily used on sites for staff consumption, cleaning and water-tight tests on vehicles and their tanks. It comes mainly from the drinking water network and secondarily from recycling systems.

#### **Identified risk**

Water consumption has been identified as one of Trigano's main environmental risks in view of its environmental and economic impact.

## The other risks, identified as low in relation to Trigano's activities, are not analysed.

The KPIs for water and energy consumption are based on the number of leisure vehicles produced:

	2022/23	2021/22	Ch	g.
Motorhomes	44,367	42,138	2,229	+5.3 %
Caravans	12,849	13,300	-451	-3.4 %
Mobile homes	4,641	4,518	123	+2.7 %
Quantity of leisure vehicles produced	61,857	59,956	1,901	+3.2%

The KPI on the rate of recovery and recycling of NHW refers to all NHW produced by Trigano's sites.

#### **Policy implemented**

Various actions are regularly taken by the business units to control water consumption, e.g. recycling of washing water, water-tight testing of vehicles and their tanks, use of push-buttons for staff use.

Awareness-raising efforts and actions to quickly detect and treat water leaks are part of Trigano's continuous improvement programmes. They have enabled a further reduction in the volume of water leaks of 10.5% between the last two financial years.

Water use	Scope	Unit of mea- surement	2022/23	2021/22	chg. gross	like for I 2022/23	ike <sup>(1)</sup> chg.
Total water use across all sites (incl. leaks) Total water consumption: excluding leaks	all sites	in thousands of cu.m.	122.3 <b>116.4</b>	118.3 <b>111.6</b>	3.4 % <b>4.3 %</b>	109.5 <b>103.5</b>	-7.4 % <b>-7.3 %</b>
Total water consumption: excluding leaks KPI – adjusted water consumption ratio: excluding leaks share of industrial use only	leisure vehicle production sites	in thousands of cu.m. in cu.m. per leisure vehicle produced	<b>88.7</b> <b>1.43</b> 43%	<b>93.4</b> <b>1.56</b> 51%	-5.0 % -8.0 %	<b>88.7</b> <b>1.43</b> 43 %	-5.0 % -8.0 %
share of staff consumption			57%	49%		57 %	

<sup>()</sup> like for like: excluding the impact of the acquisitions of Libertium network companies and S.I.F.I.

On a like-for-like basis, total adjusted water consumption (excluding leaks) at all Trigano sites fell by 7.3% in 2023. For leisure vehicle production sites alone, total adjusted water consumption (excluding leaks) fell by 5.0%, while leisure vehicle production increased by 3.2% over the same period. Thanks to the combined effect of these two developments, the key performance indicator improved by 8.0% compared to the previous year. The reduction in water consumption is the result of actions taken by the business units, in particular the recycling of water from water-proof tests on leisure vehicles and the use of rainwater.

#### **B** - Energy use

The energy consumption of vehicle production sites is related to the manufacture, heating, transport, lighting and cleaning of vehicles.

Energy sources purchased and used on sites are electricity, natural gas, other sources of gas (butane, propane), fuel and diesel. Some of our energy sources come from renewable origins. These are either produced internally on our sites (heat pumps, solar panels, internal use of wood waste for heaters), or supplied by external operators (solar, wind, water, bio-fuels, etc.) depending on the energy mix.

#### **Identified risk**

Energy consumption across production sites has been used given its environmental and economic impact, and this increased due to the current energy crisis. Concerning Trigano's carbon footprint, this energy use on sites represents a small share, whilst the largest share is that related to the use of products.

#### **Policy implemented**

Trigano's policy is to reduce energy intensity, improve energy efficiency and increase the use of renewable energy as well as reducing the weight of vehicles produced.

#### **Initiatives taken**

A large number of initiatives to improve energy efficiency at production sites – some of which involved significant investment – were carried out during the year, including:

- The installation of light sensors,
- The installation of high-speed doors,
- The installation of automatic switches,
- Thermal insulation of buildings and their accesses,
- The installation of destraficators,
- The greening of the vehicle fleet (electric or hybrid),
- The search for compressed air leaks, monitoring consumption,
- The installation of LED lighting, with automatic detection where required,
- The installation of new, more efficient boilers and a reduction in heating temperatures,
- The raising of staff awareness,
- The reduction of working hours,
- Automatic heating control and adiabatic process by thermal group, and replacement of old compressors
- The installation of solar panels on several sites for their own consumption.

The Leisure Vehicles produced are regularly improved in order to reduce their energy consumption and thus their carbon footprint, such as for instance the installation of LED lighting.

Energy consumption		Unit of	2022/23	2021/22		like for like <sup>1</sup>	
	Scope	measure- ment	2022/23	2021/22	chg.	2022/23	chg.
Electricity (with renewable energy from external sources)			45.0	46.6	-3.4 %	42.2	-9.4 %
Gas (natural gas + other gases)			43.6	50.5	-13.7 %	41.2	-18.4 %
Fuel oil and diesel	all sites	in millions 6.0	19.2	14.4	33.3 %	15.6	8.3 %
Others			5.0	20.0 %	6.0	20.0 %	
Total energy consumption		UT AT	113.8	116.5	-2.3	105.0	-9.9%
share of renewable energies			14%	14 %	-	15%	-
share of other energies			86%	86 %	-	85%	-
Total energy consumption	leisure vehicle	in thousands of kWh	79.2	84.9	-6.7	79.2	-6.7 %
	production sites	in kWh per leisure vehicle produced	1,280	1,416	-9.6 %	1,280	-9.6 %

(1) like for like: excluding the impact of the acquisitions of Libertium network companies and S.I.F.I.

Thanks to the actions described above, total energy consumption on a like-for-like basis fell by 9.9%, particularly gas and electricity, which account for nearly 80% of Trigano's total energy consumption.

For leisure vehicle production sites alone, total energy consumption fell by 6.7%, while leisure vehicle production increased by 3.2% over the same period. Thanks to the combined effect of these two developments, the key performance indicator improved by 9.6% compared to the previous year. Although the share of internally generated energy increased by 19% in 2023, the share of renewable energy increased slightly on a like-for-like basis due to the fall in the proportion of externally sourced renewable energies reflecting the energy mix of electricity suppliers in France (-13.6%).

The significant increase in internally generated energy is due in particular to the growing use of solar power at three sites in Spain and one site in Slovenia, and biomass for heating at two sites (one in the United Kingdom and one in Slovenia). In 2023, biomass accounted for 70% of the renewable energy produced internally at our sites.

#### C - Production of non-hazardous waste

The production of non-hazardous waste on sites is due primarily to processes involving wood and metals as well as packaging.

#### **Identified risk**

The production of non-hazardous waste has been identified as a major environmental risk in view of its environmental and economic impact.

#### **Policy implemented**

This policy for improving the management of non-

#### Key performance indicator

hazardous waste implemented includes:

- the reduced use of raw materials;
- Raising awareness of staff to sorting;
- Increasing the rate of recycling/re-use;
- Development of a waste compacting solution;
- Donations of reusable items to charities;
- finding new off-site recovery and recycling channels for mixed waste (panel offcuts, XPS offcuts, etc.)

Non-hazardous waste	Unit of mea- surement	2022/23	2021/22	chg. gross	like for li 2022/23	ke <sup>(1)</sup> chg.
Generation of non-hazardous waste	In tonnes	31,111	29,682	4.8 %	30,445	2.6 %
KPI - Rate of recycling non-hazardous waste.	As a %	78.4%	75.5%	<b>2.7 pts</b>	78.4%	<b>2.7 pts</b>

<sup>(1)</sup> like for like: excluding the impact of the acquisitions of Libertium network companies and S.I.F.I.

The recovery/recycling rate increased by 2.7 points thanks to improved sorting of sawdust, awarenessraising among suppliers on the need to reduce packaging and the implementation of innovative recovery/recycling channels (e.g. extruded polystyrene offcuts, panel offcuts).

### 3.2.2. Other Information

In addition to the main risks, Trigano devotes resources to the prevention of pollution and other environmental risks.

#### **Prevention mechanisms**

#### **Environmental assessment and certification**

Several of the largest Trigano sites have been ISO 14001 certified: Adria Mobil, Trigano SpA, SEA SpA, and Benimar.

## Resources devoted to the prevention of environmental risks and pollution

Human and financial resources have been assigned to the Trigano environmental policy. During 2022/2023, specific environmental expenses (investment in infrastructure, studies, audits, etc.) was up sharply compared with the previous financial year, amounting to €3.1 million (€1.3 million in 2022). Nearly 80% of these investments concern the installation of solar panels, LEDs and heating/cooling control systems.

## Amount of provisions and guarantees for environmental risks

Trigano has not recorded any provisions or guarantees for environmental risks in addition to the guarantees included in its insurance policies, with the exception of a small provision for the half-yearly groundwater monitoring of the Trigano MDC site at Tournon-sur-Rhône in connection with the definitive cessation of operations at this site.

During this financial year, no pollution accidents with environmental damage occurred.

#### **Pollution Control Measures**

#### Measures to Prevent, Reduce and Remedy Releases to Air, Water and Soil

Regulatory checks on discharges carried out at sites subject to this obligation during the 2022/2023 financial year identified temporary minor noncompliance concerning wastewater discharges at one site in France.

## Consideration of noise and other forms of pollution

The nature of the activities carried out by Trigano and the fact that the sites are largely located in business zones limit noise pollution for local residents. In order to limit noise pollution, steps have been taken to improve the circulation of staff vehicles around the sites, the ventilation of production buildings in the event of high temperatures, and the installation of soundproofing partitions around silos and vacuum pumps.

#### Circular economy (excluding non-hazardous waste)

#### Hazardous waste prevention and management

The production of hazardous waste is primarily created by industrial activities involving surface treatment, adhesion and painting as well as packaging.

Hazardous waste		2022/23	2021/22	chg. gross	like for like (1)	
					2022/23	chg.
Generation of hazardous waste	in tonnes	771.7	652.9	18.2 %	682.2	4.5 %
Recycling rate of hazardous waste	as a %	53.5%	37.8 %	+15.7 pts	48.5%	+10.7 pts
Cost for treatment of hazardous and non-hazardous waste	in€m	3.8	3.2	18.8 %	3.6	12.5 %

<sup>(1)</sup> like for like: excluding the impact of the acquisitions of Libertium network companies and S.I.F.I.

On a like-for-like basis, hazardous waste production increased by 4.5%. The recovery/recycling rate for hazardous waste improved by 10.7 points on a likefor-like basis thanks to the development of sorting initiatives and the implementation of new channels.

The increase in the treatment cost of all waste produced by Trigano is related to increases in the costs of managing this waste by service providers.

In addition, during fiscal 2023, Trigano committed €0.5 million to permanently cease the surface treatment activity at Trigano MDC's La Roche de Glun site in France. This one-off operation, which involved the removal of 123.3 tonnes of equipment and chemical products, helped to reduce the environmental impact of the La Roche de Glun site.

#### **Consumption of raw materials**

The primary materials used across our production sites are natural, such as wood, or industrial (metals, polystyrene, polyester, plastics, etc.).

#### **Climate Change**

By virtue of its core values and its activity centred on outdoor leisure activities, Trigano has, since its creation in 1935, paid particular attention to preserving the environment. It was committed to a process of continuous improvement of its carbon footprint in order to reduce its impact on climate change, even before it became one of the major global challenges of the 21st century.

To better measure its footprint and take appropriate action to improve it, since 2010 Trigano has carried out an annual carbon assessment based on methods

#### Greenhouse gas (GHG) emissions in tCO, eq:

#### 10 main motorhome and caravan production sites

Scope	definition	2022/23
Scope 1	direct GHG emissions	14,828
Scope 2	indirect energy-related GHG emissions	1,827
Total Scopes 1 and 2 (in $tCO_2$ eq)		16,655

In addition, a detailed study was extended to Scope 3 on the basis of vehicles marketed by Trigano

Trigano has also, for several years, been developing production of components such as furnishing, metal parts, cushions, curtains and mattresses as well as certain polyester parts which it is unable to produce.

Regular research is undertaken to optimise the use of these materials and the use of replacements (composite materials, recycled products, etc.) in order to reduce the ecological impact of vehicles and leisure equipment produced. This is illustrated across our sites notably by the development of recycled cardboard packaging, as well as recycling of wood offcuts and experimenting the use of new materials.

#### **Other risks**

Trigano has not taken any particular initiatives to manage risks concerning its activities such as protection of biodiversity, animal well being, food waste or combating food insecurity.

recognised at the French (Ademe) and European (GHG Protocol) levels at its main motorhome and caravan production sites.

During the 2022/2023 financial year, a study was carried out for Scopes 1 and 2 on the ten main motorhome and caravan production sites located in France, Slovenia, Italy, Spain, Germany and the United Kingdom; these accounted for more than 75% of total motorhome and caravan production. The results are as follows:

VDL, making it possible to measure the breakdown of greenhouse gas emissions by scope.

#### Breakdown of GHG emissions in tCO, eq according to the study carried out on Trigano VDL

Scope	definition	breakdown of main components	Total
Scope 1	direct GHG emissions		0.4%
Scope 2	indirect energy-related GHG emissions		O.1%
Total Scopes 1 and 2			0.5%
Scope 3	other indirect GHG emissions	fixed assets	2.0%
		inputs (manufacturing materials)	6.0%
		transport	7.0%
		uses	84.6%
Total Scope 3			99.5%
Total Scopes 1, 2 and 3			100.0%

Nearly 85.0% of the carbon footprint of Trigano's motorhomes and caravans comes from the use of leisure vehicles on the road by customers and their end-of-life (part of Scope 3), while the production activity accounts for just over 15.0% (Scopes 1 and 2, part of Scope 3).

An extrapolation of the total amount of GHG for Trigano's production of motorhomes and caravans was carried out, with the following results:

#### GHG emissions ratio for Trigano's total motorhome and caravan production

	scope	unit	2022/23	2021/22	chg.	%
GHG emissions (Scopes 1.2 and 3): total by extrapolation		tCO <sub>2</sub> eq.	4,387,896	4,045,248	342,648	8.5 %
Sales <sup>1</sup>	total motorhomes	€m	2,498.5	2,081.6	416.9	20.0 %
Ratio: (GHG emissions Scopes 1.2 and 3)/sales		tCO₂eq/€m	1,756	1,943	-187	-9.6 %
Ratio: (GHG emissions scopes 1.2 and 3)/motorhomes	unit vehicles	tCO2eq./ motorhomes	98.9	96.0	2.9	3.0 %
GHG emissions (Scopes 1.2 and 3): total by extrapolation		tCO2eq	220,808	133,000	87,808	66.0 %
Sales <sup>1</sup>	total caravans	€m	259.9	241.6	18.3	7.6 %
Ratio: (GHG emissions Scopes 1.2 and 3)/sales		tCO₂eq/€m	850	550	299	54.3 %
Ratio: (GHG emissions scopes 1.2 and 3)/caravan	unit vehicles	tCO2eq./ motorhomes	17.2	10.0	7.2	71.8 %
GHG emissions (Scopes 1.2 and 3): total by extrapolation	totol	tCO <sub>2</sub> eq	4,608,704	4,178,248	430,456	10.3 %
Sales <sup>1</sup>	total motorhomes	€m	2,758.4	2,323.2	435.2	18.7 %
Ratio: (GHG emissions Scopes 1.2 and 3)/sales	and caravans	tCO₂eq/€m	1,671	1,798	-128	-7.1 %

(1) Excluding the impact of the acquisitions of Libertium network companies and S.I.F.I. in 2022/23 and 2021/22.

Half of the 10.3% increase in GHG emissions for motorhomes and caravans can be attributed to the increase in motorhome production and half to the updating of the average ratios used. These now include:

- Better compliance with GHG protocol rules, which require the integration of energy consumed throughout the life of the leisure vehicles;
- The integration of a more precise breakdown of inputs;
- Adjusted usage data (in driving mode and in residential mode).

However, this increase is less than the growth in sales in 2023, so carbon intensity over the year was down 7.1%; the GHG ratio for Trigano's total production of motorhomes and caravans in relation to sales is 1,671 tCO<sub>2</sub>eq/ $\in$ m in 2022/23 (1,798 tCO<sub>2</sub>eq/ $\in$ m in 2021/22).

#### Action plan adopted

However, Trigano has undertaken a number of actions to reduce its carbon footprint:

- production: a regular search to reduce the energy consumption of Leisure vehicles by acting on their structure and equipment;
- Uses:
  - A search for better leisure vehicle aerodynamics in order to reduce wind resistance and in turn fuel consumption (development of new ranges of "Slim" motorhomes);
  - Optimisation of energy consumption in the living area (tests and simulations to design systems that consume less energy);
  - Raising user awareness by offering remote management systems for consuming items in leisure vehicles (already rolled out for around 6,000 vehicles).

The regular development of European standards governing atmospheric pollution for motor vehicles including motorhomes (Euro6d) has led to a reduction in these emissions thanks to the use of more efficient and economical engines.

The first junior committee had the goal of working on the group's carbon footprint. It presented its reflections to the strategic committee.

These will be further developed by the managers concerned, whether regarding product developments, the supply chain or production. In this perspective, feedback on the production of solar energy on site has also allowed us to stimulate studies into new renewable energy production projects. Finally, the management objective of developing multidisciplinary skills in this committee was achieved.

#### **Challenges and perspectives**

Public policies are changing and, along with the impact of recent geopolitical events, creating a host of new challenges: more restrictive anti-pollution standards, the increase in energy prices as well as the need to reduce greenhouse gas emissions.

New restrictions and requirements will impact the development of products by automobile constructors who are partners of Trigano due to:

• The desire of the EU to see combustion powered vehicles disappear (the target of no new combustion powered vehicle registrations from 2035);

- The tightening of regulatory limits on pollutant emissions from diesel vehicles with the introduction of the Euro7 standard:
- Reduced exhaust emissions
- Limited emissions of particles from braking
- Limited emissions of particles from tyre abrasion

- Limited loss of capacity of electric vehicle batteries over time.

To rise to these challenges, Trigano needs to prepare for the following:

- To integrate into its ranges of motorhomes, rolling chassis bases which comply with Euro7 standards within the necessary lead times (and notably anticipate the requirements related to developments to the weight of vehicles)
- To design leisure vehicles which are adapted to use as electrical vehicles

Trigano has begun this energy transition strategy with various stakeholders:

- Upstream partnerships with automobile constructors;
- Impact analysis of expected developments in the design of leisure vehicles;
- Study of electrical and mechanical systems interfacing with electrified chassis;
- Involvement in national and European authorities of proper consideration of specificities relating to leisure vehicles by public authorities.

## Adapting to the consequences of climate change

Despite the increasingly frequent occurrence of exceptional natural events in Europe, Trigano's sites have not been significantly affected to date. In addition, a policy of prevention (e.g. hail nets, sprinklers) and insurance is applied to all Trigano sites.

#### Assets of the sector

Leisure vehicles are products used primarily for residential purposes, which saves on water and energy consumption.

Compared to other forms of leisure, such as home or hotel stays, leisure vehicles actually reduce environmental impacts, as shown by the following two comparative studies.

Based on the following assumptions, Trigano compared the GHG emissions of a motorhome stay with those of a home stay in France over a period of 25 years:

- Motorhome excluding food, not on the road:
  - Assumptions: total useful life of 25 years, average use by 2 people over 8 weeks each year
  - Result: 7.0 tCO<sub>2</sub> excluding driving, i.e. 17.5 kgCO<sub>2</sub> per week per person
- Home stay, excluding food:
  - Assumptions: 2.7 tCO<sub>2</sub> per year per person in France (Source:National Low Carbon Strategy published by the French government in 2018)
  - Result: 51.9 kgCO, per week per person

Excluding driving and fuel, a motorhome emits 66% less GHG than the average residential home.

Emissions avoided by using a motorhome compared to a person in his or her home therefore represent  $13.7 \text{ tCO}_2$  per motorhome over 25 years.

Based on the following assumptions, Trigano made a comparison of GHG emissions between a week's holiday in a motorhome and a week-long stay in a hotel:

- Motorhome xcluding food, on the road:
  - Assumptions: 98.9 tCO<sub>2</sub> per motorhome, total useful life of 25 years, average use of 8 weeks each year
  - Result: 495 kgCO<sub>2</sub> per week
- Hotels excluding food, including transport:
- Assumptions: estimates based on emissions published by major players in the French hotel sector
- Result: 786 kgCO<sub>2</sub> per week

Transport included, a week's holiday in a motorhome would emit 63% less CO<sub>2</sub> than a hotel stay.

Swedish and Italian studies have also shown that the use of leisure vehicles is more environmentally friendly than most competing types of holidays or leisure.\*

\* Ostfoldforskning – Sept. 2018: "the climate impact of taking one's own cabin on holiday – a greenhouse gas account for motorhomes";

Paolo Fiamma Pisa university – Jul. 2015: 2015: "Mobile Lodging Unit: First Experimental Research in Italy on the Sustainability of the Recreational Vehicles".

## 3.3. Issues relating to the respect of human rights

In accordance with the Ethics Charter, Trigano employees are called upon to refrain from any violation of Human Rights and to ensure that their stakeholders do the same. The new ethics charter adopted in 2018, which updates the high standards of integrity defined and conveyed by the charter adopted in 2005, reaffirms Executive Management's commitment to support the Company's growth in compliance with the law and best practices.

## Diversity and equal opportunities/equal treatment

Trigano, a multicultural company, recognizes diversity as a richness, with the confrontation of ideas and points of view being a source of progress for the company. Freedom of association and the recognition of the right to collective bargaining are respected.

The ethical charter stresses the need to respect labour legislation and therefore prohibits any measure of discrimination on the grounds of age, sex, ethnic origin, religion or political convictions. It prohibits the employment of children under the age of 16 in the Group's entities or among its stakeholders (suppliers, subcontractors, customers). The employment of illegal workers is also prohibited.

In order to promote the initiatives taken in this area, internal communication focuses on publicising the measures taken in favour of young people, women, the disabled and senior citizens. Freedom of expression, association and membership of trade unions is also safeguarded.

Trigano employs 448 disabled people, 158 of whom are in France, thus meeting 84.5% of its legal obligations in mainland France. In Serbia, Trigano employs 113 disabled people out of a workforce of 306 with an adapted organisation.

#### Protection of personal data

Respect for the protection of personal data is a factor of trust, a value to which Trigano attaches particular importance.

Consequently, each Trigano stakeholder who needs to know personal data is required to sign an NDA and data protection charter.

Changes having taken place, and the scope of the companies concerned having evolved since the entry into force of both the GDPR and the French Data Protection Act, Trigano and its subsidiaries, concerned about respecting the rights of individuals with regard to their personal data, considered that it was necessary to renew the training of all data protection officers. Consequently, several training sessions and awareness-raising sessions have been undertaken in order to allow data protection officers to acquire, for some, and improve, for others, their knowledge in respect of data protection.

Against a backdrop of constantly changing regulations, Trigano is continuing to regularly update all of its contractual documentation, its confidentiality policies and any support relating to personal data, while ensuring their protection.

## **3.4. Issues related to the fight against corruption and tax evasion**

Trigano has always taken care to develop its commercial activities across all sites in respect of values of probity and professional ethics, and to combat all forms of corruption.

With the tightening of French anti-corruption legislation (the Sapin II law), Trigano has intensified its policy of preventing and combating corruption by reaffirming its values of probity and ethics, for which each employee is the guarantor.

During fiscal 2022, Stéphane Gigou, Chairman of the Management Board, took over the chairing of the anticorruption and ethics steering committee, taking over from Marie-Hélène Feuillet, who is now a member of the Supervisory Board. Under the aegis of the CEO, this committee unites joint actions and initiatives led by the Management Board, and purchasing, internal audit, finance, legal and human resource teams.

A map of risks of exposure to corruption, through a risk-assessment based approach has been developed across four strategic points: organisation and sector, management, relations with third-parties and operations, taking account of activities undertaken and geographical sectors. The synthesis of this mapping shows a low level of exposure to corruption for Trigano and its subsidiaries. This mapping is updated annually.

On this basis, the Group has drawn up an anticorruption code of conduct setting out the principles to be respected by each employee. It provides that any failure to comply with its provisions shall be sanctioned in accordance with the applicable disciplinary regime.

The anti-corruption code of conduct, the ethics charter and the anti-corruption alert system based on the provisions of the Sapin 2 Act have been translated and sent to all Trigano business units in France and abroad. They are given to each employee as well as to Trigano's stakeholders and are accessible to all on its website.

The respect of all of these anti-corruption principles by all members of staff is guaranteed by regular training of those employees the most exposed in light of the risk mapping, in France and abroad. The training courses scheduled to meet the obligations arising from the Sapin II law were able to be held via e-learning. 524 people were trained amounting to a total of 1,048 training hours.

#### General whistleblowing system

To enable its employees and stakeholders to report any cases of violation of the Ethics Charter and the Anti-Corruption Code of Conduct of which they may be aware, Trigano has set up a secure professional whistleblowing system that collects reports through internal management. The content of this warning system and its operating guide are distributed to all Trigano employees and stakeholders at the same time as the ethics charter and the anti-corruption code of conduct.

#### Combating tax evasion

Trigano is careful to conduct its activities in compliance with applicable tax laws. The reporting obligations and the payment of tax are carried out in the countries where the group is present.

## 3.5. Duty of care plan

Trigano has a long standing commitment to risk management. Meeting the application criteria set by French law no. 2017-399 of 27 March 2017 on the duty of care, Trigano drew up its first duty of care plan in 2023, which is consistent with its commitments and its risk management strategy set out with its stakeholders.

#### 3.5.1. Governance

Trigano has set up a Duty of Care Committee made up of the Chair of the Management Board, the Chief Executive Officer, the Chief Financial Officer, the Energy Transition Director, the Purchasing Director, the Legal Officers, the Head of Human Resources and the Head of Internal Audit.

The role of this Committee is to steer the duty of care plan to ensure that it is implemented throughout the Group. It lays down the guidelines, priority actions and resources allocated to their implementation. It meets at least once a year to review the results of action plans and update risk mapping where necessary, taking into account discussions with stakeholders.

During the year, the members of the Committee met on several occasions to map duty of care risks, drawing on external expertise. Following this work, the Duty of Care Committee met twice to validate the present duty of care plan.

#### 3.5.2. Risk assessment

#### a. Methodology

The Duty of Care Committee has adopted the following methodology for mapping risks, in order to assess the specific risks of serious harm to human rights and fundamental freedoms, the health and safety of individuals and the environment resulting from the Group's direct activities and those of its subcontractors or suppliers:

- **Purchases:** Definition of the level of risk based on purchasing volumes, the location (country) of suppliers and the environmental challenges associated with each category of purchases (based on international expert databases).
- **Internal activities:** Definition of the level of risk taking into account the types of activities, the country where these activities are located and the associated environmental challenges.
- **Customers** Identification of the main risks taking into account the types of customers (private, public) and their use of products/services.

International standards such as the Universal Declaration of Human Rights, the conventions of the International Labour Organization (ILO) and the guiding principles of the Organisation for Economic Co-operation and Development (OECD) have been used to identify the risks.

The scope covered is Trigano and its subsidiaries, customers, suppliers and subcontractors.

Interviews were conducted with the Group's main managers to analyse and validate the risks relevant to Trigano.

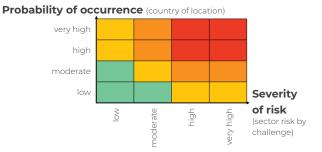
#### b. Risk assessment

For each risk, a gross risk assessment was carried out based on an analysis of external and internal data to rate the risk using databases specific to each theme (country, sector, product risk, etc.).

Two dimensions were taken into account, with four levels of risk (from low to very high):

- the probability of occurrence of the risk: mainly linked to risk specific to the country where the activity is carried out, weighted by the size of this activity (for the purchasing part);
- 2. the severity of the risk: assessed on the basis of information provided by specialised databases.

By cross-referencing the probability of occurrence and the severity, we can estimate a gross risk.



A second step is to evaluate existing internal actions to rate risk control. Four levels of control have been defined. Applying the level of control to the gross risk gives the net risk and defines the risks as low, moderate, high or very high.

#### a. Risk categories

The risks relating to the duty of care are as follows:

#### **Human rights**

- Health and safety at work: workplace accidents, physical and psychological health, well-being at work.
- Employee and site safety: physical safety of employees.
- Non-discrimination: gender equality, people with disabilities, age.
- Combating violence and harassment: e.g. intimidation, bullying or sexual harassment.
- Just and favourable working conditions: working hours (for example, pressure to work outside the scope of the contract), pay, breaks, rest periods.
- Respect for freedom of association and collective bargaining: e.g. discrimination against unionised employees, failure to provide the means for employee representation or negotiation.
- Prohibition of child labour.
- Prohibition of forced labour.
- Respect for privacy: e.g. the right to disconnect for employees, the absence of individual monitoring of connection times for employees working from home or the use of surveillance cameras for purposes other than security.

#### Environment

- Climate change: contribution to climate change through greenhouse gas (GHG) emissions, energy consumption.
- Biodiversity: degradation of marine and freshwater ecosystems, degradation of terrestrial ecosystems (changes in land use, land take, deforestation, etc.).
- Resources: water consumption and contribution to water stress, overexploitation of land resources (mineral resources, materials derived from living organisms such as wood).
- Pollution: air pollution excluding greenhouse gases, water pollution (freshwater and marine ecosystems), soil pollution.
- Waste: production of hazardous waste, production of non-recyclable waste.

#### b. Main results with duty of care risk matrix

The analysis and assessment of duty of care risks has made it possible to prioritise them, both internally and externally. Thus, for suppliers and subcontractors, the categories of purchases most at risk have been identified, and within the parent company and subsidiaries, the activities most at risk have been defined.

In summary, the most significant risks are as follows:

#### **Internal activities**

- The environmental aspect, including reducing the carbon footprint of Trigano's sites.
- Improving working, and health and safety conditions in industrial operations.

#### Purchasing

- Control of the supply chain in terms of human rights and the environment, especially with regard to non-European suppliers and subcontractors.

#### Customers

Note: this summary does not address customerrelated risks. The assessment of gross risk was based on the typology of customers and their location, as well as the environmental impact generated by the customers' activity related to Trigano's products (sale or use). In summary, customer-related risks are considered to be low or non-existent. They relate in particular to the end use of products (greenhouse gas emissions, atmospheric pollution and waste). Ultimately, the Group has little room for manoeuvre with these players.

#### 3.5.3. Mitigation measures

The following measures have been implemented in response to the main risks identified in the duty of care risk map.

#### a. Duty of care management

The establishment of a Duty of Care Committee will make it possible to oversee this issue. The work already carried out on mapping duty of care risks has enabled us to identify areas for improvement. This assessment process will be completed by an EcoVadis study of Trigano. The aim is to identify the missing elements in the Group's policies and procedures on Human Rights, the Environment and Ethics. On this basis, the Duty of Care Committee will decide on priorities to correct the weaknesses identified.

#### b. Climate change

Trigano has recruited an Energy Transition Director to lead and coordinate work on Trigano's energy transition. In particular, he is working to reduce energy consumption at Trigano sites. Four energy audits were carried out in the 2022/2023 financial year, on two industrial sites and two commercial sites. The main actions in this area are as follows:

- Investment in the installation of solar panels on Trigano's industrial sites: 15 projects are underway or planned, representing a total investment of €6.4 million and generating 7.6 million kilowatt hours, or around 8% of the Group's energy consumption. These projects have resulted in a 19% increase in the proportion of renewable energy generated internally.
- Actions to improve energy efficiency at production sites (see details in 3.1.1 of the NFIS)

#### c. Site environment

Since 2002, Trigano's environmental policy has been managed through the monitoring of quantitative and qualitative environmental data based on key performance indicators (KPIs). To complement this approach, Trigano has established a three-year plan for 2021-2024 to improve environmental and energy performance across all subsidiaries. The plan has three main pillars:

1. Reducing waste production and optimising the use of raw materials;

- 2. Reducing the carbon footprint;
- 3. Reducing water consumption.

Details of actions and outcomes are described in section 3.1.1 of the Non-Financial Information Statement.

#### d. Improvement of working conditions

Trigano strives to improve working conditions at highrisk workstations, and invests broadly in the renovation of industrial and tertiary premises. The following initiatives were undertaken during the year:

- Improving safety and ergonomics;
- Improving safety at high points on production lines;
- Renovation or upgrading of changing rooms;
- Renovation of administrative offices.

#### e. Health and Safety

Work-related accidents are reported on a monthly basis, enabling us to monitor changes in indicators – in particular frequency and severity rates – and the implementation of appropriate policies within subsidiaries.

Details of actions and outcomes are described in section 3.1.3 of the Non-Financial Information Statement.

#### f. Privacy

Particularly attentive to maintaining a relationship of trust with its stakeholders, Trigano has set up a system aimed at respecting privacy and protecting personal data based on the requirements of the General Data Protection Regulation (GDPR). Training has been provided for the Group's data protection officers.

Details of actions and outcomes are described in section 3.3 of the Non-Financial Information Statement.

#### g. Prevention of corruption

Trigano has implemented the anti-corruption measures required by French regulations (known as the Sapin II law). This is monitored by an anti-corruption and ethics steering committee chaired by the Chair of the Management Board.

Details of actions and outcomes are described in section 3.4 of the Non-Financial Information Statement.

#### **Relations with suppliers**

Trigano has long been aware of the risks of supplier duty of care.

Action has been taken to raise awareness of ethical issues among suppliers and subcontractors by communicating the ethics charter, the anti-corruption code of conduct and the whistleblowing procedure. The clauses of the purchase agreement have been tightened.

A CSR (Corporate Social Responsibility) and compliance questionnaire has been drawn up to take into account all of the subjects covered by the duty of care plan (human rights, environment, ethics and anti-corruption). The responses received cover more than 70% of the total amount of purchases. They did not bring to light any significant weaknesses.

96% of Trigano's purchases are made within the European Union or in the United Kingdom. Chassis suppliers account for 40% of purchases. These companies are themselves highly committed to CSR and communicate on their ethical, environmental and anti-corruption commitments.

#### 3.5.4. Next steps

#### New European legislation on the duty of care

On 23 February 2022, the European Commission adopted a proposal for a directive (the Corporate Sustainability Due Diligence Directive, or CSDD) to strengthen the involvement of companies in human rights and environmental abuses.

The European Parliament approved the proposal on 1 June 2023 and the text is expected to be formally adopted in 2024.

#### h. Whistleblowing system

Trigano has set up a whistleblowing system allowing its employees to report a serious and manifest breach of the law or a regulation, a threat or serious harm to the general interest, in particular with regard to:

- Corruption and influence peddling (in particular any behaviour or situation contrary to the rules set out in the anti-corruption code of conduct or the ethics charter);

- Risks relating to serious violations of human rights and fundamental freedoms, the health and safety of individuals, or the environment resulting from the company's activities or those of its subcontractors or suppliers.

A new information campaign on the whistleblowing system is underway at Trigano and its subsidiaries, taking into account regulatory changes in the area of occupational whistleblowing.

To complete this system, an Ethics and CSR Charter for Trigano's Suppliers and Subcontractors has been drawn up. It summarises all expectations placed on suppliers and subcontractors in terms of human rights, the environment and ethics. It will be communicated first and foremost to the main suppliers and suppliers identified as being at risk in the mapping of third parties. This charter will then be appended to the standard purchase agreement.

In addition, the CSR and compliance questionnaire will be sent out again in a targeted manner according to the risks identified.

During the 2023/2024 financial year, Trigano will communicate the Supplier Ethics and CSR Charter to the rest of the suppliers and subcontractors.

A CSR assessment process for suppliers and subcontractors will be defined and implemented.

Trigano will monitor regulations to ensure that the new obligations are best taken into account in the supply chain.

## **Reasoned opinion on the conformity and sincerity of the Non-Financial Information Statement**

#### To the shareholders

Following the request made to us by Trigano, we hereby present our report on the consolidated extra-financial performance statement for the year ended 31st August 2022 (hereinafter the "Declaration"), presented in the group's management report in accordance with the legal and regulatory provisions of articles L. 225-102-1, R. 225-105 and R. 225-105-1 of the Commercial Code. RSE France is an Independent Third Party Organisation (ITO) accredited by the Cofrac under n°3-1051 (scope available on www.cofrac.fr).

#### **Corporate Responsibility**

It is the responsibility of the Management Board to prepare a Declaration in accordance with legal and regulatory requirements, including a presentation of the business model, a description of the main nonfinancial risks, a presentation of the policies applied with regard to these risks and the results of these policies, including key performance indicators.

#### Independence and quality management system

The work described below was carried out in accordance with the legal and regulatory provisions of Articles L. 225-102-1, R. 225-105 and R. 225-105-1 of the French Commercial Code, the requirements of ISO 17029 and the verification programme for a statement of non-financial information drawn up by RSE France.

Independence and quality management system

Our independence is defined by regulations, our code of ethics and the provisions of ISO 17029. In addition, we have implemented a quality management system that includes documented policies and procedures to ensure compliance with ethical rules, applicable legal and regulatory texts and the ISO17029 standard.

#### **Responsibility of the Independent Third Party Organization**

It is our responsibility, on the basis of our work, to issue a reasoned opinion expressing a conclusion of moderate assurance on:

- the conformity of the Declaration with the provisions of Article R. 225-105 of the Commercial Code;
- the sincerity of the information provided pursuant to 3° of I and II of Article R. 225-105 of the French Commercial Code, i.e. action plans, the results of policies including key performance indicators relating to the main risks, hereinafter the "Information».

However, it is not for us to pronounce on:

- compliance by the company with other applicable legal provisions, if any, (in particular those provided for by Law No. 2016-1691 of 9th December 2016, known as Sapin 2 (fight against corruption)];
- compliance of products and services with applicable regulations.

#### Nature and scope of work

Our work described below was carried out in accordance with the Order of 14 September 2018 determining the terms and conditions under which the independent third party organisation carries out its mission.

We have carried out work enabling us to assess the Declaration's compliance with legal and regulatory provisions and the sincerity of the Information:

- We have taken note of the business activity of all the entities included in the scope of consolidation, of the presentation of the main social and environmental risks related to this activity, and of its effects in terms of respect for human rights and the fight against corruption, as well as of the resulting policies and their results;
- We assessed the appropriateness of the collection process in terms of its relevance, completeness, reliability, neutrality and understandability;
- We have verified that the Declaration covers each category of information provided for in Article L.III. 225-102-1 in social and environmental matters, as well as respect for human rights and the fight against corruption;
- We have verified that the Declaration presents the business model and the main risks related to the activity of all the entities, including, where relevant and proportionate, the risks created by its business relationships, products or services, with regard to the information provided in I of Article R. 225-105, as well as policies, actions and results, including key performance indicators;
- We have verified, where relevant to the main risks or policies presented, that the Declaration presents the information provided for in II of Article R. 225-105;
- We appreciated the process of identifying, prioritizing and validating the main risks;
- We have verified that the Declaration includes a clear and reasoned explanation of the reasons for not having a policy on one or more of these risks;

- We have verified that the Declaration covers the consolidated perimeter, i.e. all entities included in the scope of consolidation in accordance with Article L. 233- 16. As the Company indicated in its Statement, the three distribution companies consolidated during the financial year were not included in the environmental information category. Similarly, those entities solely undertaking administrative activities and without any significant environmental impact do not fall under the remit of the Declaration in its environmental section.
- We assessed the entity's collection process for the completeness and fairness of the policy outcomes and key performance indicators to be reported in the Declaration;
- We have implemented on key performance indicators related to the main risks (energy consumption per vehicle, water consumption per vehicle, recycling rate of non-hazardous waste, absenteeism rate, accident frequency and severity rate, number of training hours per person), and on a selection of other results that we considered the most important (headcount, electricity consumption, volume of hazardous waste, greenhouse gas emissions, corruption, data protection, responsible purchasing):
  - analytical procedures to verify the correct consolidation of the data collected and the consistency of their trends;
  - tests of detail on the basis of sampling, consisting of verifying the correct application of definitions and procedures and reconciling data with supporting documents. This work was carried out with a selection of contributing entities (Trigano SEA, Trigano SPA and Luano Camp in Italy, Trigano VDL in France) and covered 18.8% of the social data, between 23.0% and 26.8% of the environmental data (excluding GHGs), and 100% of the consolidated data for the KPIs and results selected for these tests;
- We consulted documentary sources and conducted interviews to corroborate the qualitative information (organisation, policies, actions, results) that we considered most important (environmental policy, supply chain risk management, anti-corruption, protection of personal data);
- We assessed the overall consistency of the Statement in relation to our knowledge of the company.
- We believe that the sampling methodology and sample sizes selected in the exercise of our professional judgement provide a moderate level of assurance; a higher level or assurance would have required more expansive inspections.

These procedures enable us to form an opinion based on our verification of the Statement. The audit focuses on the veracity of historical information that predates the Statement, including the outcomes already achieved. We believe that the sampling methods we have used in exercising our professional judgement allow us to express this opinion with a moderate level of assurance.

Due to the use of sampling techniques and other limitations inherent in the operation of any information and internal control system, the risk of not detecting a material misstatement in the Statement cannot be completely eliminated.

We consulted documentary sources and conducted interviews to corroborate the qualitative information (organisation, policies, actions, outcomes) that we considered to be the most important;

We assessed the overall consistency of the Statement with our knowledge of the company.

#### **Means and resources**

We conducted 21 interviews with the persons responsible for preparing the Statement, representing, among others, senior management, administration and finance, risk management, compliance, human resources, health and safety, training, environment and procurement. The assignment was completed between September and November 2023. We believe that our work provides a sufficient basis for the conclusion expressed below.

#### Conclusion

On the basis of our work, we have not identified any material misstatements likely to call into question the fact that the Declaration complies with the applicable regulatory provisions and that the Information, taken as a whole, is presented fairly.

Paris, 17 November 2023

Gérard SCHOUN Patrice LABROUSSE