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SOCIAL AND HUMAN RIGHTS

INTRODUCTION

At Lùkla, our commitment to exemplary working conditions and respect for human rights is reflected in our adherence to the United Nations Global Compact. This policy, focused on corporate social responsibility, highlights our concrete actions to ensure fair working conditions and to promote equality, diversity, and non-discrimination.

WORKING CONDITIONS AND RESPECT FOR HUMAN RIGHTS

Our commitment to the United Nations Global Compact guides us in upholding universal principles and aims to ensure respect for human rights, labor standards, the environment, and anti-corruption efforts.

By signing the Global Compact, we pledge to uphold and promote the fundamental rights of our employees. This is reflected in the implementation of fair working conditions that respect human dignity and comply with international labor standards. We ensure that our employment practices are transparent, non-discriminatory, and aligned with the fundamental rights set out in the Universal Declaration of Human Rights (Chapter 4 – Responsible Purchasing Charter).

Through our affiliation with the International Labour Organization (ILO), we commit to respecting international labor standards, combating forced and child labor, and promoting freedom of association and the right to collective bargaining. These commitments strengthen our responsibility toward our employees and contribute to creating a fair and ethical working environment.

The implementation of our internal ethics policy complements our commitment to exemplary professional practices (Chapter 3 – Ethics). This policy clearly sets out our core values, ethical standards, and the expected behavior of all Lùkla employees.



EQUALITY AND DIVERSITY

Lùkla values diversity in all its forms: cultural, ethnic, gender, age, sexual orientation, and ability. We are committed to creating an inclusive environment where every individual is respected, supported, and has the opportunity to thrive professionally.

EQUAL OPPORTUNITIES BETWEEN MEN AND WOMEN

Principle of Equality: Lùkla advocates for equal opportunities for women and men at all levels of the organization. We are committed to fostering an environment where every talent, regardless of gender, has the same opportunities for advancement, professional development, and success.

Fair Compensation: Lùkla's compensation policy is based on the principle of pay equity. Salaries and benefits are determined according to skills, experience, and professional contribution, without gender-based discrimination.

Promotion and Career Development: Decisions regarding promotion and career advancement are based solely on merit, skills, and professional performance.

Flexibility at work: Lùkla supports the need for flexible working arrangements to meet the needs of all employees, especially in relation to family responsibilities. We encourage a healthy work-life balance for everyone, regardless of gender.

Awareness and Training: Awareness initiatives are in place to promote a culture of inclusion and mutual respect among all employees.

Reporting Procedures: You can report serious concerns confidentially or anonymously if you have reasonable suspicions, by clicking on the following link :

[Outil d'alerte Lùkla.](#)

Confidential and fair procedures will be implemented to investigate all allegations.

DIVERSITY CHARTER

The Diversity Charter is a commitment statement offered for signature to any employer who wishes, through a proactive approach, to promote diversity and go beyond the legal and regulatory framework for combating discrimination.



SIGNER ET AGIR

La diversité est le fondement d'une société performante socialement et économiquement. Inscrite dans la politique globale, de l'entreprise ou de l'organisation, la Charte de la diversité a pour objet de favoriser l'égalité des chances et la diversité dans toutes ses composantes.

La Charte de la diversité contribue à développer un management respectueux des différences et fondé sur la confiance. Elle améliore la cohésion des équipes, source d'un meilleur vivre ensemble et donc de performances.

Les engagements de la Charte de la diversité, traduits en actions mesurées et évaluées régulièrement, sont facteurs de progrès social et économique. Leur mise en œuvre dans toutes les activités de l'entreprise ou de l'organisation renforce la reconnaissance auprès de toutes les parties prenantes internes et externes en France et dans le monde.

Par la signature de la Charte de la Diversité,
nous, entreprise ou organisation, nous engageons à :

- 1 Sensibiliser et former nos dirigeants, et managers impliqués dans le recrutement, la formation et la gestion des carrières, puis progressivement l'ensemble des collaborateurs aux enjeux de la non-discrimination et de la diversité
- 2 Promouvoir l'application du principe de non-discrimination sous toutes ses formes dans tous les actes de management et de décision de l'entreprise ou de l'organisation et en particulier dans toutes les étapes de la gestion des ressources humaines
- 3 Favoriser la représentation de la diversité de la société française dans toutes ses différences et ses richesses, culturelle, ethnique et sociale, au sein des effectifs et à tous les niveaux de responsabilité
- 4 Communiquer sur notre engagement auprès de l'ensemble de nos collaborateurs ainsi qu'à nos clients, partenaires et fournisseurs, afin de les encourager au respect et au déploiement de ces principes
- 5 Faire de l'élaboration et de la mise en œuvre de la politique de diversité un objet de dialogue social avec les représentants du personnel
- 6 Evaluer régulièrement les progrès réalisés, informer en interne comme en externe des résultats pratiques résultant de la mise en œuvre de nos engagements.

Fait à PARIS, le 14 février 2025
LUKLA GROUP
Philippe GUINCHARD, Président Directeur Général

Secrétariat Général de la Charte de la Diversité
Yann TANGUY

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NON-DISCRIMINATION AND HARASSMENT

Our non-discrimination policy aims to create an inclusive work environment where every individual, regardless of background, life experience, or personal characteristics, can thrive professionally. We are firmly committed to eliminating all forms of discrimination and promoting social inclusion within our organization.

INCLUSION

We believe in the power of inclusion. Our inclusion policy goes beyond simple non-discrimination by actively promoting the integration of individuals from all backgrounds, thereby fostering a dynamic mix of skills, perspectives, and ideas within our team.

Inclusion in Recruitment Processes

We ensure that our recruitment processes are fair and accessible to all. We actively promote inclusion by encouraging diverse applications and removing potential barriers that could hinder the participation of qualified individuals.

PROGRAMMES D'ACCOMPAGNEMENT

SUPPORT PROGRAMS

We offer onboarding programs designed to facilitate the integration of new employees, particularly interns and apprentices who are entering the workforce for the first time. These programs provide additional support and resources to ensure the smooth flow of information within Lùkla (see Section IV – Training and Well-being at Work).

By implementing these programs, we help build a professional environment where every individual feels not only welcomed but also valued for their skills and contributions.



TRAINING AND WELL-BEING AT WORK

At Lùkla, workplace well-being is a top priority. Providing a healthy, attractive, and safe environment has a positive impact on employee satisfaction and mental health. It also helps us attract and retain talent—our most valuable resource.

TRAINING AND SKILLS DEVELOPMENT

At Lùkla, we are committed to creating a dynamic work environment that fosters the professional growth of our talents and supports the evolution of their roles. Clear and fair guidelines are in place to enhance our employees' employability, secure their professional future, and sustain the Group's growth.

New talents are encouraged to write an "onboarding feedback report" during their trial period. This helps ensure that the initiatives in place meet the expectations of new team members.

Our employees' career development is a key pillar of our HR policy.

Regular career discussions are held between each permanent employee and their manager. These meetings aim to explore professional aspirations, identify development opportunities, and align individual goals with those of the Group.

Training programs are offered to employees to help them develop skills related to new industry technologies and enhance their professional performance.

Training may also be offered if changes in the scope of work or the emergence of new technologies in the market put the mission at risk.

Lùkla is committed to creating an environment where every talent can reach their full potential. This policy is regularly reviewed to ensure it remains aligned with the company's objectives and meets the needs of its employees.

EMPLOYEE HEALTH

We place utmost importance on the health of our employees. We are firmly committed to fostering a professional environment that supports the physical and mental well-being of everyone. We strongly believe that health is a fundamental element of work performance and job satisfaction.

MEDICAL EXAMINATION AND SUPPORT

Each employee undergoes a medical examination during their probation period. Subsequent check-ups are personalized based on the employee's evolving health condition. Follow-up must take place no later than five years after the initial medical visit. Lùkla's HR teams, occupational health services, and the manager work together when an employee requires special attention regarding their health.

This tailored and personalized support allows the employee to adjust their working hours or obtain sick leave to return to work under optimal conditions.

We are fully aware of the importance of balancing working time and recovery to ensure effective physical and mental recuperation.

SOCIAL DIALOGUE

At Lùkla, our social dialogue policy is based on transparency, participation, and cooperation among all stakeholders within the company. We recognize that social dialogue is essential for building a strong organization and promoting collaborative decision-making.

THE LEADERS :

Lùkla's leaders are fully committed to open and transparent communication with employees. They regularly share the company's vision and strategic objectives and actively seek employee feedback to better understand their concerns, needs, and ideas. Management Committee (ManCom) and Executive Committee (EXCOM) meetings are held at least once a month, and detailed minutes from these meetings are shared with the relevant parties and systematically implemented.

EMPLOYEES :

Lùkla's employees are strongly encouraged to actively participate in social dialogue. A reporting system has been implemented on Boondmanager, where employees evaluate their work experience each month. Additionally, interns are invited to complete a satisfaction survey during their contract.

MANAGERS :

Managers are required to hold a one-on-one meeting each month with every team member and provide a detailed report in the Boondmanager tool. These sessions help gauge the employee's mindset and review key points from the past month. This regular communication enables managers to promptly inform Leadership and the HR department to resolve any issues, if necessary, thereby ensuring a healthy environment within the Group.

SEC (SOCIAL AND ECONOMIC COMMITTEE) :

We engage in dialogue with employee representatives to understand employees' specific concerns and to find solutions together. They help maintain a strong connection between staff and the leadership team. Regular meetings of the Social and Economic Committee (SEC) are held to address, among other topics, issues related to working conditions and employee benefits. Minutes of these sessions are produced to ensure full traceability of the discussions and decisions made. This ongoing documentation

sustains continuous collaboration between leadership and the SEC, helping create a productive work environment for all teams.

SHAREHOLDERS AND PARTNERS :

Shareholders are kept transparently informed about the company's performance, strategic initiatives, and key developments. Regular meetings are held to discuss ongoing matters and gather shareholder feedback on strategic directions. This feedback is considered, allowing decisions to be adjusted and ultimately validated collectively.

SUPPLIERS :

Suppliers play an essential role in our operations. It is therefore crucial to maintain long-term and ethically sound relationships with them. To that end, we engage in regular communication with our supplier partners to ensure the quality of their products and services, and to collaborate on sustainable practices. Our commitment is reflected in our intention to work exclusively with suppliers who share our values. As part of this approach, we require them to sign our Procurement Charter, which can be found in Chapter 4 on Responsible Purchasing. This initiative strengthens our commitment and promotes our practices throughout the entire supply chain.

CLIENTS :

Fostering dialogue with our clients is of utmost importance to understand their needs, gather feedback on our products and services, and anticipate market trends. We use open communication channels such as satisfaction surveys, events, and business lunches while respecting the ethical standards outlined in Chapter 3, to ensure ongoing and constructive dialogue.

LOCAL COMMUNITIES :

We maintain a proactive dialogue with local communities to support initiatives and contribute positively to the sustainable development of the regions where we operate. We are committed to implementing concrete projects and actions aimed at improving living conditions, promoting education, strengthening infrastructure, and enhancing community well-being. This active collaboration reflects our desire to create a lasting and positive impact, aligned with our core values.

By promoting open and inclusive dialogue with all stakeholders, Lùkla aims to build an ecosystem where collaboration and mutual understanding are central to decision-making and the company's day-to-day management.

REPORTING AND ASSESSMENT

To assess the effectiveness of our social policy and human rights within Lùkla, we have defined key performance indicators (KPIs) aligned with our commitments, to measure and improve our actions.

1. PROFESSIONAL EQUALITY INDEX

We assess our commitment to professional equality by using the Professional Equality Index. This KPI allows us to measure, for example, the pay parity between men and women. This indicator is communicated externally every year.

2. RECOGNITION OF DISABLED WORKER STATUS (RQTH)

We measure our commitment to the inclusion and retention of people with disabilities in employment through the Recognition of Disabled Worker Status (RQTH).

3. REPORTS

Reports are essential tools to demonstrate and assess our actions in terms of CSR (Corporate Social Responsibility). These detailed documents present our social and environmental initiatives as well as the outcomes of our community commitments.

4. TRAINING REPORTS

We measure the effectiveness of our training programs using detailed reports. These documents allow us to evaluate employee participation, skills acquired, and to adjust our actions to meet the needs of our staff and the evolving industry (new technologies, new tools, etc.).

5. REPORTS ON SOCIAL DIALOGUE

We produce reports to measure the frequency and quality of interactions between the leadership team and the SEC (Social and Economic Committee). These data help to enhance transparency, identify opportunities for improvement, and ensure open and constructive communication within the company.

These regular assessments guide our actions and enable continuous improvement in our CSR efforts. Through the analysis of these KPIs, we identify strengths, weaknesses, and areas for improvement, thereby strengthening our commitment to sustainable, ethical, and responsible business and social practices.

