2022 ATLINAS BRINGING PEOPLE CLOSER

CORPORATE SOCIAL RESPONSIBILITY

ANNUAL REPORT

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1 MANAGEMENT COMMITMENT

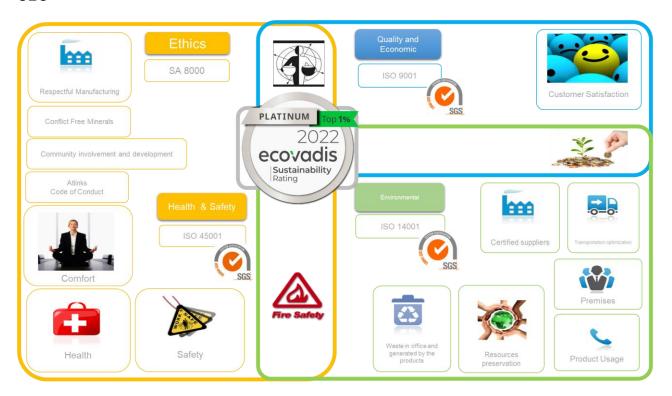
ATLINKS delivers excellence in its products, services and solutions that ensure customer value and contribute to their success. We strive to be recognized by our employees, customers, community, and shareholders as a responsible organization that conducts our business in a manner that conserves the environment, minimizes pollution, protect its employees from hazards by minimizing the risks.

Our commitment to quality, environment, health, safety and sustainable supply chain is reflected through programs focused on continual improvement and compliance with applicable regulations, industry standards and best practices, contractual requirements and corporate initiatives. Planned, integrated and consistent efforts involving every element of our organization created these results.



To warranty this approach, ATLINKS has an Integrated Management Systems, which is certified conforming to the International Standards for: Quality, ISO 9001; Environment, ISO 14001 and Organizational Health and Safety, ISO 45001. We also support the 10 Principles of the United Nations Global Compact to enforce our commitment to all the stakeholders in our business, and we establish goals and targets in line with the Sustainable Development Goals defined by the United Nations.

C.H. Tong CEO



2 COMPANY PRESENTATION

ATLINKS designs, develops, markets, and sells fixed-line telephones, mobile phones, video, multimedia terminals, and other communication products dedicated to the elderly. ATLINKS customers are telecom operators and professional and consumer retailers all around the world.

It is a fab-less company, so it has a set of key manufactures for products (also called, suppliers or vendors), which are long time partners for ATLINKS.

ATLINKS distributes worldwide the product range under three main channels: Consumer, Telco and Professional, and uses importers in some countries to export the goods to those countries.

ATLINKS commercializes products under its brands: Alcatel, Swissvoice, Amplicomms, and ATLINKS. It also uses the Telco and distributors brands. It acts as distributor for products under other brands.







January 2010



Independent company

2017 and 2019 Acquired





Worldwide presence
Hong Kong
France
Spain
Mexico

Brand present in 60 countries



Telecom operators, business wholesalers, retailers

PSTN & IP office phones



Home phones & Monitoring solutions



Elderly range





3 COMPANY STRUCTURE

ATLINKS Holdings Ltd is a Hong Kong based company, with three subsidiaries, ATLINKS Asia Ltd, based in Hong Kong, ATLINKS Europe SAS, based in France and Swissvoice International S.A., based in Switzerland. There are three representative offices, one in Mexico which manages the commercial activity for Latam, another in Madrid which manages the Iberia market and in Shenzhen for the China market. Other markets are addressed thru distributors, importers and/or agents.

ATLINKS GROUP Ltd, the company who owns Atlinks Holdings Ltd, is a Hong Kong listed company. All financial information is publicly available at the investors section of the corporate web site: www.atlinks.com.

The staff of the company repartition is as follows:

Atlinks Asia Ltd:

Atlinks Europe:

Atlinks UK Ltd.

Swissvoice International:

Spain Sales office:

Mexico Sales office:

Shenzhen Sales office:

22 employees

16 employees

9 employees

9 employees

9 employees

9 employees

9 employees

There are also several consultants that assure some functions as identified in the *Organization manual*.



4 ORGANIZATION

The operations of ATLINKS are developed by different companies for different functions, and it works as a sole company. The long experience of its employees and the little turn over makes a solid community.

Most of the product related functions are in Hong Kong, close to the product suppliers and manufacturing sites. The Europe operation is more oriented to the customers, marketing, and communications. Together with Europe the other sites are dedicated to sales.

4.1 RISK MANAGEMENT AND INTERESTED PARTIES

ATLINKS has identified and classified the different risks related to:

- Business activity
- Suppliers/Vendors
- Environment issues
- Health and Safety issues
- Anti-corruption and bribery

ATLINKS has identified its stakeholders and has listed their needs and requirements as a mechanism to make sure those are satisfied, qualify the impact of those requirements in the different aspects of our Management System (quality, environment and health and safety), and list the methods to mitigate the risks.

The **Business activity** risks are identified in the mappings of each process, and they are followed by the different indicators on the business activity. The risk assessment is done based defined levels of gravity and frequency of the main issues. A list of the company challenges is reviewed in a yearly basis, and the main risks are listed as well as the actions to cope with them. On the operational side, each process makes a SWOT analysis in a year basis.

The **Suppliers/Vendors** risk assessment is done every year together with their performance evaluation and audits results of the year, using the SWOT tool, before the Management Review to define the next year audit strategy. Audits are conducted every year.

For **Environment**, the risks are evaluated thru the Environmental Analysis, with the aspects and impacts matrix.

For the **Health and Safety**, the risks are also evaluated on a classical Risks assessment, based on main risks identified by the company together with the workers, and the means of control to mitigate the risks.

The **Anti-bribery** assessment is done based on a Risk matrix where we identify the issues that might happened and its consequences, for sensitive countries whenever needed.

4.2 ANTI-CORRUPTION



ATLINKS has issued a CODE OF CONDUCT, applicable to all employees and consultants working on behalf of ATLINKS.

This CODE OF CONDUCT reflects the Policy of the company to avoid any corruption, bribery or extortion, and respect of the rules and regulations related to these aspects.

Every employee has the responsibility to ask questions, seek guidance, and report suspected violations of this CODE OF CONDUCT, to the local or global Management, employee's representatives, or the Management representative.

ATLINKS has maintained an excellent check and balance system over transactions.

Our books and accounts are subjected to statutory external financial audit annually in both subsidiaries. These audits are used as one of the methods of identifying any suspicious payments which could be related to bribery or corrupt behavior.

This information is checked and controlled by finance, administration and HR department and the CEO.

Internal Audits are also used as the tool to detect any kind of deviation in this subject, and to identify any potential decision not made by any employee in an objective way, in the field of sourcing, purchasing or service request.

We have edited a *Code of Conduct HANDBOOK* with tools to help understanding of corruption and bribery, and to evaluate the risks by areas and countries where we operate.

A training plan has been completed end of 2015 and beginning of 2016 to cover the management, purchasing involved people, sales staff, and sales agents.

At the end of 2016, an extended training has been deployed to all employees and consultants. This training is based on the United Nations "The Fight Against Corruption", and it is given in the mother language of the trainee. This training is proposed to all employee that join the company.

The UN Convention against Corruption is also available in our documentation systems for easy access in the 3 main languages of the company: English, French and Spanish.

ATLINKS has also put in place a whistle blowing procedure to received input from the stakeholders publicly available at its corporate website www.atlinks.com

Result:

- 0 reports on corruption among the employees or any other stakeholder
- Training spread worldwide to staff and consultants, 58% of people is trained with Certificate of training by the UN Fight anticorruption.
- Yearly refresh during the Sustainability Awareness training.

4.3 SUSTAINABLE DEVELOPMENT: THE GLOBAL COMPACT



ATLINKS supports the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labor, Environment and Anti-Corruption. We commit to disclose our results with a yearly Communication on Progress (this document).

4.4 SUSTAINABLE DEVELOPMENT GOALS

ATLINKS objectives are in line with the Sustainable Development Goals (SDG). At our company level, our actions reported in this document are labeled with the logos of each goal we pursue. We cover a large scope of goals (10) as we can summarize in the Annex section including the targets and review within the year reported.

SUSTAINABLE GALS





































5 ENVIRONMENT

5.1 ENVIRONMENTAL MANAGEMENT

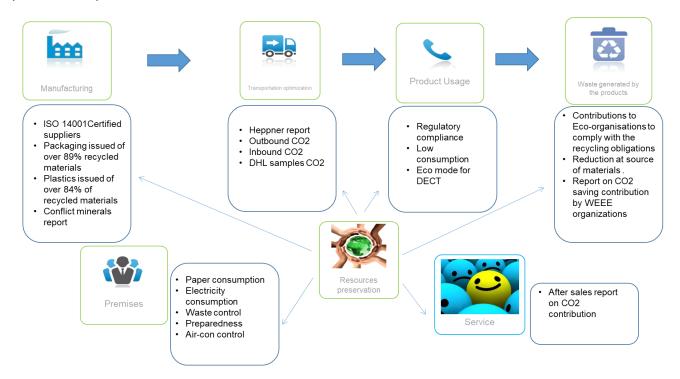
ATLINKS is a fab-less company, but very aware of the impact done in the environment. Framed with a Worldwide Environmental Management system, we focus our programs where we do have more impact: eco-design (recycling, product usage, and resources preservation), transportation, waste, and end-of-life of the products.

We also work in the environmental impact that our premises can have resources preservation (paper, electricity consumption) and waste management.

All those actions are driven within the respect of all applicable laws and regulations.

The Environmental Management system is certified under the international standard ISO 14001:2015 (Certificate in Annex section).

We calculate the year **global emissions** covering the most representative aspects using the method Bilan Carbone©, and adding the information provided by our stakeholders. We cover as much as possible Scope 1, 2 and 3. See Annex section.



5.2 ECO-DESIGN



The eco-design has a global impact in the environment, first using less raw materials, secondly, producing less waste, and third, positive impact on transportation, as we can transport more quantities using the same means. Overall, the carbon footprint of putting the product on the market is reduced. We practice the eco-design at several levels:

5.2.1 PACKAGING OF THE PRODUCT

Quantity of material used

Reduction of the packaging and user's guide, size and weight for resources preservation and transportation optimization. See chart below, AWCSU: Average Weight of Consumer Sales Unit.

- Corded has changed the size by -6,2 %
- DECT has changed the size by -2,2 %

Mono-material

Our packaging is just done of cardboard material. Only small, separated plastic bags are inside the packaging to protect the accessories in some cases.

Origin of the material-Recycled material

All the cardboard used in our product is composed of recycled material at:

• 84% in average in 2022 (improved vs 2021: 81%)

Ink origin

We have banned the mineral oil inks of our packaging by mineral oil free inks which facilitates the recycling of the packaging.

The nature of the inks used to print our packaging are 100 % on mineral oil free inks.

User awareness on packaging disposal

We follow the recommendations from the organizations to help the users in the recycling. The below logo is printed in the boxes, to indicate the good bin where different elements of the packaging for better collection and recycling. We also inform the users of this sorting guidelines in our brand websites.

• France:



Spain:



5.2.2 PRODUCT

Material reduction

Reduction of the products weight (less material used) over the years, see chart below on Average WEEE per product.

Slightly decrease (-0,82%) even if sold bigger product dedicated to the elderly.

Recycled plastic

The resin plastic raw material used to manufacture our products has origin of recycled plastic at:

89% in average in 2022 (stable vs 2021)

Product consumption

Since 2007 we implemented the EuP regulation to reduce the product consumption in its life in used and idle state (all products compliancy).



Our cordless Solo products are provided with an automatic Eco-mode system which limits the power of the handset when on or close to the base. This action limits the power consumption on talk mode.

User awareness on product disposal

We follow the recommendations from the organizations to help the users in the recycling of the product at end of life. The below logo is printed in the boxes, to indicate the good place where the product can be collected for recycling.



Chemicals management

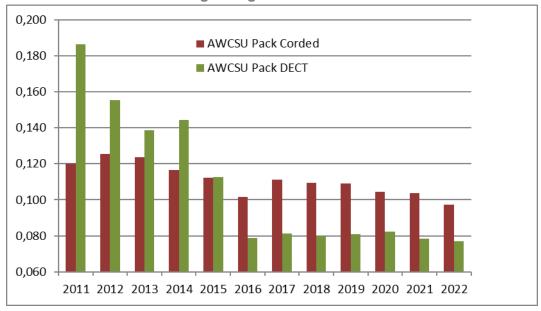
See chapter 5.6 specifically dedicated to this subject.

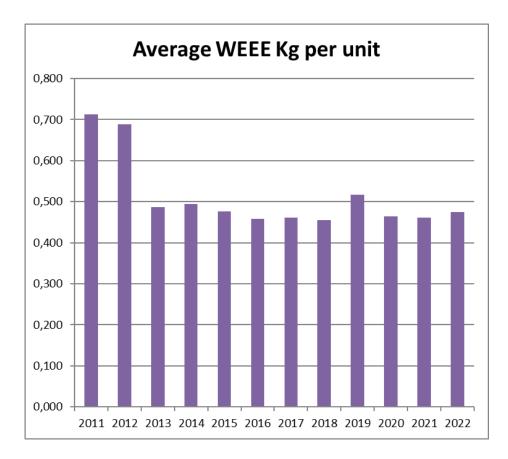
Origin of metals used

See chapter 8.7 dedicated to Conflict Minerals.

Results:

AWCSU: Average Weight of Consumer Sales Unit





5.3 ENERGY



The most significant energy consumed in our premises is due to the Information system infrastructure and its air conditioning, and heat/aircon means. We could see that the impact of the distance working with the pandemic was little, since the IT infrastructure should be always running to insure our operations.

IT infrastructure, such the Data Center (Scaleway), has a running Energy Management System, which has been Certified ISO 50001.

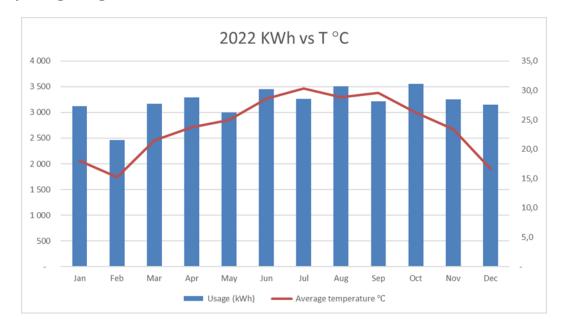
Employees are aware of simple saving reflexes.

We use full LED lamps in our sites as soon as we need to change them.

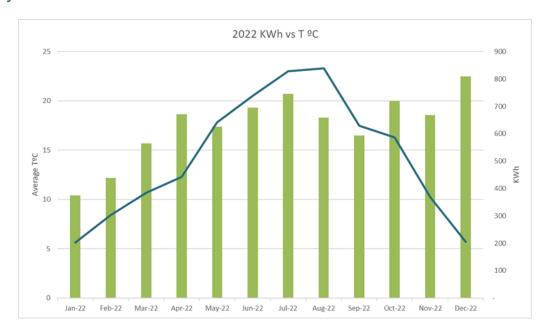
Consumption is being followed in a monthly basis compare with temperature for correlation with the consumption of heat or air conditioning. Ratio of the consumption to the surface and the number of employees is also monitored, as well as the CO2e, in a yearly basis.

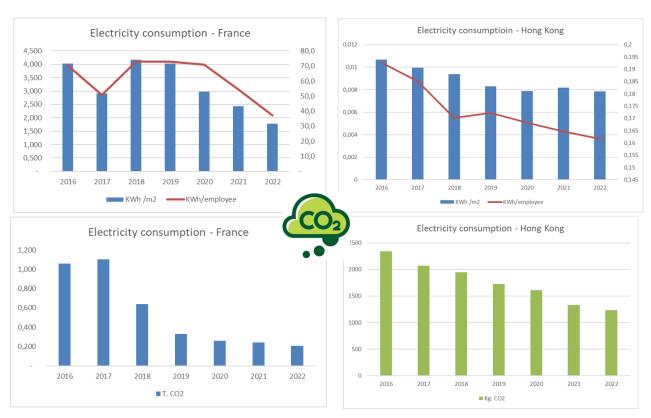
Results:

Electricity Hong Kong office: -3,8 % vs 2021



Electricity France office: -32% vs 2021





5.4 WATER



Our direct operation impact on water is limited to the sanitary use in our office buildings. Our employees are aware of the simple behaviors for saving water. Both offices have automatic-off tabs. There are not separated counters in our both offices for metering the impact.

5.5 WASTE



Waste separation (paper, carton, others): Hong Kong and France, handle by ATLINKS, in the other Sales representation offices managed by the business center where located.

Management of Hazardous Waste (WEEE from samples, toner cartridges, ink cartridges, batteries).

We use a specialized company to collect and treat all waste that do not take the city hall services, produced at the French premises.

In Hong Kong, the same kind of waste are collected and put in the recyclable adapted bins. This collection is registered by the program GREENS\$.

Result:

France:











			_			
	Weight	Weight	Trees	Litres of	CO2	
	(kg)	(Tonnes)	saved	Water saved	saved (kg)	KWH saved
2018	254	0,25	4	7620	140	1016
2019	240	0,24	4	7200	132	960
2020	170	0,17	3	4950	91	660
2021	892	0,892	5	8520	156	1136

Hong Kong:



5.6 TRANSPORTATION



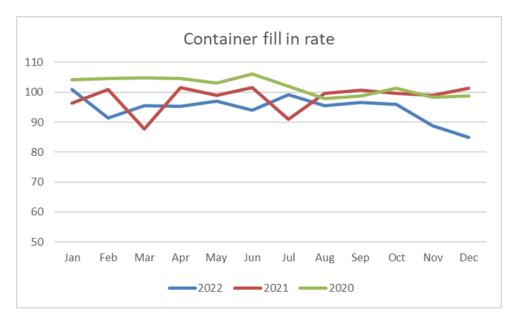
One of the main ATLINKS's environmental impacts in its operations is Transportation. Since many years, we try to avoid the most polluting transportation (air) and we concentrate in the sea transportation for the inbound transport.

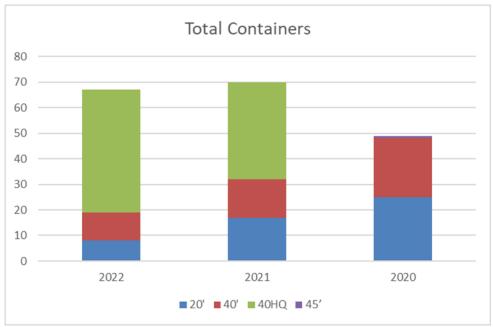
5.6.1 INBOUND TRANSPORT

One of our environmental programs has been to use higher size containers, optimize the containers capacity to be able to put a maximum of products using the same transport effort, thus reducing the CO2 impact for this activity.

Result:

- We have average rating of fulfillment 94,59% in 2022 vs 98,19% in 2021 (general logistics difficulties in the industry).
- We increase the size of the containers: Transportation using **40HQ containers are 73% in 2022** vs 60% in 2021.



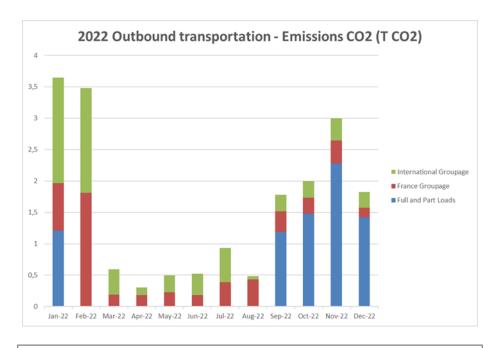


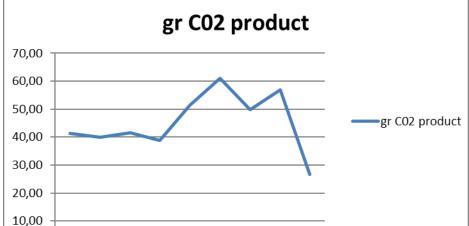
5.6.2 OUTBOUND TRANSPORT

Since the end of 2014 we are also following the outbound transportation, so we can eventually take some measures to reduce the impact. Our logistics 3rd party is an essential collaborator to support this action. For this year we are using other countries 3rd parties, but we are not able yet to add their contribution on CO2eq.

Results:

Total 19,06 T CO2e





2014 2015 2016 2017 2018 2019 2020 2021 2022



5.7 CHEMICALS MANAGEMENT

0,00

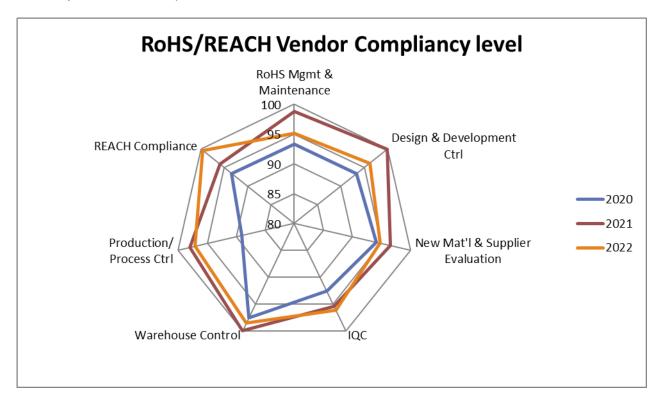
ATLINKS follows the regulations in force regarding the restriction of use of certain substances, and make sure that the products comply with all regulations in force regarding these aspects, in particular the RoHS (Restriction of Hazardous Substances) and REACH (Restriction, Evaluation, Authorization of Chemicals).

We request to the manufacturers to provide every year with the declaration of substances contained in each product and the compliancy with the RoHS regulation.

ATLINKS performs Suppliers Audits to make sure the control on those substances is made properly at the manufacturing sites. We also keep record of all the Certificates issued by our vendors in our Documentation system.

Results:

- Vendors audited: 100 % of vendors.
- Objective 90% compliant, 2022 result 96%.



5.8 PRODUCTS END OF LIFE. RECYCLING



ATLINKS participate with several organizations for the collection and recycling of the waste produced by the products all over Europe (Take back programs).

- Packaging
- WEEE
- Batteries

We declare the units put into market and weight of the different elements to be collected and contribute financially to the collection, recycling of the waste produced by our products. We participate in several "take-back programs" to reduce those wastes.

	FRANCE	SPAIN	ITALY	GERMANY	UK
WEEE	ecosystem	ecotic	erion	zentek. 2	REPIC
BATTERIES	screlec ensemble vers une économie circulaire	ecotic	erion	zentek. 2	
PACKAGING	CITEO	ecoembes	CONSIDERATIONALE IMBALLIGGI	SE GRÜNE PUNT	

5.9 SUPPLIERS ENVIRONMENTAL ASSESSMENT



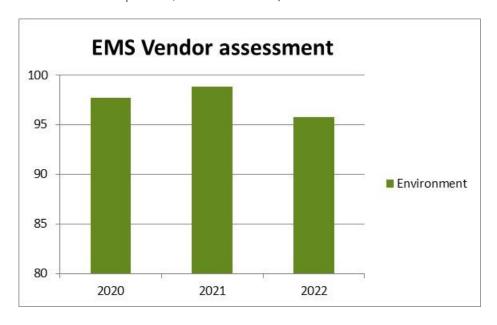
For ATLINKS its suppliers are one of the main stakeholders, and since many years a process of Selection and Evaluation of suppliers is being applied with success.

We evaluate by audits and rating our suppliers in their environmental management systems. The average rating from 0 to 100 is shown in the following chart for the 3 last

years.

Results:

- 100% of vendors audited.
- Objective over 90% compliance, 2022 result 95,77%



5.10 ATLINKS PREMISES

We have followed few programs:



Waste separation (paper, carton, others): Hong Kong and France, handle by ATLINKS, in the other Sales representation offices managed by the business center where located.

Management of Hazardous Waste (WEEE from samples, toner cartridges, ink cartridges)

Paper consumption monitoring (Hong Kong and France site)

EDI for many transactions with customers to avoid paper invoices (save paper and transport)

New management of Certificate of Origin, to avoid, paper, express courier between China and Europe.

Results:

Usage of Paper in premises:

Average daily pages consumption	2014	2015	2016	2017	2018	2019	2020	2021	2022
Hong Kong	489	477	420	443	495	348	311	338	318
		-2,5%	-13,6%	5,2%	10,5%	-42,2%	-11,9%	8,0%	-6,3%
France	279	216	231	237	250	188	139	67	75
		-29,2%	6,5%	2,5%	5,2%	-33,0%	-35,3%	-107,5%	10,7%

5.11 ENVIRONMENTAL COMPLIANCE

As part of the commitment of Compliance with laws and regulations in the frame of the Management systems certification, ATLINKS have given provisions to identify the applicable laws and regulations, evaluate its compliancy and regularly survey the modifications. Part of the provisions are the subscription to a specialized platform in France, Novallia (novallia.com), and the follow up of the Hong Kong related ordinances. ATLINKS keeps records and inform the management of the compliance situation every 6 months.

6 LABOR PRACTICES AND DECENT WORK

In ATLINKS operations countries we have been always respectful with the local laws and regulations which comply with the respect of the Human rights. We also have requested to our suppliers to be compliant with it and we make audits to all of them to ensure the compliancy.

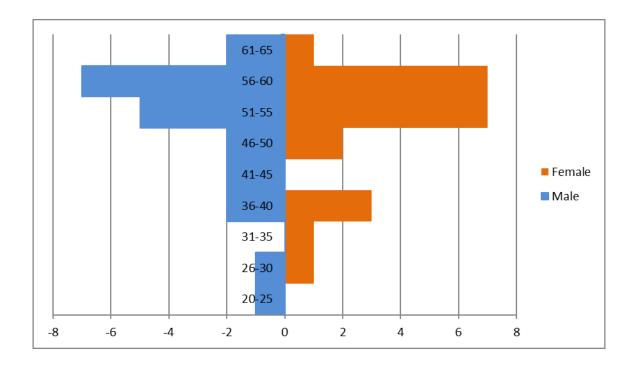
6.1 ATLINKS STAFF



Most of our staff is issued from the Joint-venture between Alcatel and Thomson in the early 2000's. We have a little turn-over and there is a natural equilibrium on female/male collaborators.

Management at first level of reporting to CEO is balanced female/male.

The recruitment level is very small, since the company had been structured at its creation in 2010 to the level of staff coherent to the operations in a very competitive and non-growing market.



6.2 EMPLOYEES INSURANCES AND MEDICAL CHECKS



All ATLINKS employees are entitled to a personal and family medical insurance, as well as travelers' insurance, when travelling on the company mission.

Wherever the regulations require a medical check, they are duly performed. Records are kept in the HR files.

6.3 CONTRACT OF PROGRESS. LABOR /MANAGEMENT RELATIONS

The management and the employees fix the objectives for the year. There are individual and/or team objectives. Those are reviewed in a year basis on a meeting of the employee with his manager. It is also the moment where the competences and training can be reviewed. 100% of the employees are covered by this process.

Result:

All employees followed the review.

6.4 ORGANIZATIONAL HEALTH AND SAFETY PROGRAMS



Within the framework of the OHSAS Management systems the following programs have been deployed in relation with the hazards and risk level identified by the company and its employees.

Health

- E-mail management guidance for the stress reduction (100% of staff)
- Ergonomic assessment on the use of computer and screen. (1 site Hong Kong)
- Office exercising guidance (2 sites France and Hong Kong)
- o Anti-smoking campaign in the French subsidiary in November.
- o Pandemics management following the government instructions. Adaptation to the changes.

Safety

- Staff has been trained to the fire risk, by performing evacuation drills and the usage of fire extinguishers (2 sites, France and Hong Kong)
- First Aid Kit
- o Driving safe chart published and sign by the company car drivers (100% of company drivers).
- Driving safe training has been provided to the company drivers. 100% of company drivers have completed the training.

Results:

- ATLINKS has 0 accidents in 2022.
- 1 Evacuation drill in France (move to the new office)
- 0 Evacuation drill in Hong Kong (restrictions on outdoor gathering since pandemics)

6.5 TRAINING AND AWARENESS



The aim of training is to contribute to the development of the competencies of the staff, to better address existing and future needs of the Company, and:

- To identify the technological and organizational evolutions,
- To anticipate and accompany professional evolutions of the staff according to the Company needs,
- o To improve on the level of expertise, knowledge, and competency of the staff.

A training plan is established as per company and staff needs.

There are trainings and awareness meetings organized yearly on the field of Quality, Environment, Health and Safety and Sustainable development areas, for all the staff.

Results:

- Training provided as per training plan in both entities.
- Training Hours average per employee:
 - o France: 2.2 hours/employee
 - o Hong Kong: 3.38 hours/employee

6.6 DIVERSITY AND EQUAL OPPORTUNITY



ATLINKS is a very international company, with a mix of nationalities in each country where operates. There are "foreigners" in all entities:

We do have a total of 4 nationalities belonging to 2 continents.

 Despite of being a technology company, there is a good balance in genders (male 50% and female 50%).

6.7 HANDICAP



The little turn-over and the lack of manpower growth, makes difficult to ATLINKS to hire handicapped people. However, a diagnostic has been performed by external consultant (Alther, Enterprises and Handicap) in February 2014 to improve the performance in this field.

A decision has been made and since then we have identified one supplier for dealing with the WEEE office waste, and the rest of office recyclable waste, who is an "ESAT" (*Établissement et services d'aide par le travail*) and can provide the Certification of equivalent timing worked for ATLINKS by handicapped staff.

Results:

In 2022 the cost of the handicapped labor is up to 168,2 €

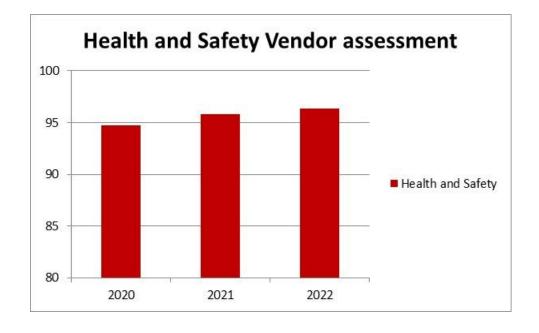
6.8 SUPPLIERS ASSESSMENT ON HEALTH AND SAFETY

For ATLINKS its suppliers are one of the main stakeholders, and since many years a process of Selection and Evaluation of suppliers is being applied with success.

We evaluate by audits and rating our suppliers in the Health and Safety aspects. The average rating from 0 to 100 is shown in the following chart for the 3 last years.

Result:

- 100 % vendors audited.
- Objective is 90% compliant, in 2022 result 96,33% compliant.



6.9 COMPLIANCE ON HEALTH AND SAFETY

As part of the commitment of Compliance with laws and regulations in the frame of the Management systems certification, ATLINKS have given provisions to identify the applicable laws and regulations, evaluate its compliancy and regularly survey the modifications. Part of the provisions are the subscription to a specialized platform in France, Novallia (novalia.com), and the follow up of the Hong Kong related ordinances. ATLINKS keeps records and inform the management of the compliance situation every 6 months.

7 HUMAN RIGHTS

7.1 NON-DISCRIMINATION AND HARASSMENT

ATLINKS ensure that their employees are afforded an employment environment that is free from physical, psychological, and verbal harassment, or other abusive conduct, and provide equal employment opportunity to employees and applicants for employment without discrimination. ATLINKS has provisions such as internal rules to ensure the respect of this principle, and ATLINKS displays these regulations publicly at its premises, for any employee or applicant to be aware of.

7.2 FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING



ATLINKS has always guaranteed the freedom of association in full compliance with current regulations. The employees are represented by electing their representatives.

Human Resources and Management are in direct contact with the representatives and staff, with a formal and informal interchange of news and information.

In accordance with unions and/or representatives ATLINKS verifies the strict application and interpretation of provisions stated in the existing National Collective Labor Contract; performs and follows all stages of any negotiation.

Results:

- Regular summary meetings are issued per year (mainly France and Spain sites)
- Elections are organized as per the local regulations: 2020 no candidates at representatives
 Election for France.

7.3 CHILD LABOR, FORCE AND COMPULSORY LABOR



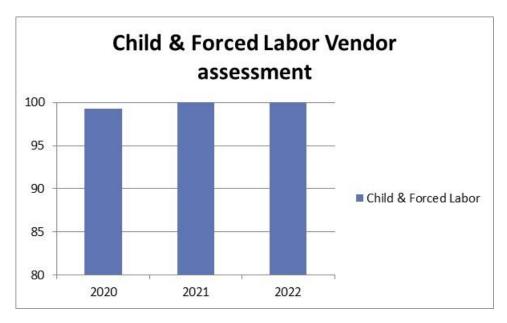
For ATLINKS its suppliers are one of the main stakeholders, and since many years a process of Selection and Evaluation of suppliers is being applied with success.

We evaluate by audits and rating our suppliers to avoid child labor and any compulsory or force labor. The average rating from 0 to 100 is shown in the following chart for the 3

last years.

Result:

- 100 % vendors audited.
- In 2022 result 100% compliant.



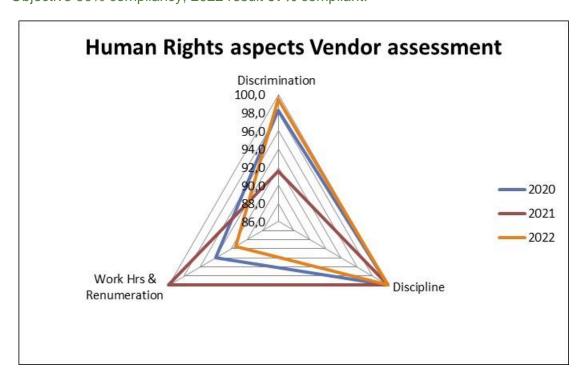
7.4 SUPPLIER HUMAN RIGHTS ASSESSMENT

For ATLINKS its suppliers are one of the main stakeholders, and since many years a process of Selection and Evaluation of suppliers is being applied with success.

We evaluate by audits and rating our suppliers to warranty the respect of human rights. The average rating from 0 to 100 is shown in the following chart for the 3 last years.

Result:

- 100 % vendors audited.
- Objective 90% compliancy, 2022 result 97% compliant.



7.5 SECURITY PRACTICES

As part of our Health and Safety Management systems ATLINKS follow the labor regulation to secure the activities of its employees and stakeholders. Based on the Safety risk assessment some



provisions are put in place for security, such as regulatory verification and reviews of its safety installations, fire extinguishing means, and performing evacuation drills. Awareness and training are provided to the staff.

Company drivers have signed the "Drivers Commitment Chart" with strong commitments in security practices.

PRODUCT RESPONSIBILITY

CUSTOMER HEALTH AND SAFETY 8.1

ATLINKS cares about the Health and Safety of the users, and it complies with the relative European directives on Low voltage (2006/95/EC) and Electromagnetic compatibility (2004/108/EC).

Tests are performed to safety products before putting into market and keep records for compliancy demonstration.

Most of our products are tested against these directives even if they are not for Europe.

8.2 PRODUCT LABELING

Our products are labeled in conformity with the applicable laws and regulations: CE, cross-bin-wheel, and some other areas requirements.

SERVICE CENTER, CONSUMER SUPPORT



Within the frame of our Quality Management systems, we put the customers in the center of the targets. We do all the best to listen to them and give a maximum of satisfaction:

- We have a web site with customers interface to ask the questions related to product or our services
- We do provide our user's guides in an extended version, to include in the packaging only simpler version (less paper to print).
- We received letters to give us feedback in our service
- We have a Call Center (Hot line) to provide support for the use or what to do in case of doubts, or any quality issues with the products.
- We provide 2 years warranty for better satisfaction. 0
- We have implemented a Service Center to repair or refurbish the products.
- Service Center also provide a good information about the quality of the products and eventually the improvements to implement to avoid any quality problems, particularly in the NOT FAULT FOUND category, which indicate other issues than failure of the products
- The Service Center has an integrated Management System Certified, for Quality, Environment, Health and Safety and Information Security.
- The Service Center also manages the WEEE following the European Directive 2012/19/EU. 0

Result:

- The return rate has been constantly decreased and arrive to a very low level, indicating a very reliable product.
- The second-year (even third for Spain) warranty appears to be a very little impact in our operations.
- The complaints from customers are become more compliments and just questions asked.
- The hot line provides a good service level.
- The products are more reliable and then less Waste to produced.
- The information provided to the customers makes the need to bring the products to the Service Center avoiding unnecessary transportation or refurbished products.
- The extended version of user's guide available on the web makes less paper to print, less weight to transport and less waste to handle at the end of life for products.
- High level of reparability index for our mobile phones:



The service provided by our repairing system during 2020 has avoided: 61491 kgCO2e (Method Bilan Carbone®), 91% ratio CO2e avoided.

8.4 CUSTOMER PRIVACY

ATLINKS applies the Regulation n°2016/679 from 27 April 2016, also known as General Data Protection Regulation (GDPR) related to the protection of the data of its customers and makes it mandatory for any suppliers in contact with its customers to respect it. A specific program is established to make sure all the requirements of the directive are followed.

- ATLINKS subcontracts a Data Center (Scaleway) and a Service Center (Ingram), both have an Information Security Management Systems, Certified ISO 27001 to warranty the technical means to safeguard the customer data.
- ATLINKS manage paper confidential information by using a protected bin, collected few times a year. Certificate of destruction is issued by the company handling this sensitive waste (Cèdre)

8.5 PRODUCT COMPLIANCE

ATLINKS has a process in place to follow the different regulations, thru alerts, webinars, seminars, newsletters, and some external assessments by notified bodies, to follow the European regulations. For other areas we rely on a network of professionals (technical people, labs, and commercial people) to provide the changes applicable to ATLINKS.

The compliancy to regulations is one of the main requirements to put products in the market.

8.6 PRODUCT EXTERNALS EVALUATIONS (ECO-RATING)

ATLINKS participates to an initiative done by one of its customers to the evaluation of the products Environmental performance called Eco-rating, with the contribution of WWF. The Environmental performance of the products is based on:

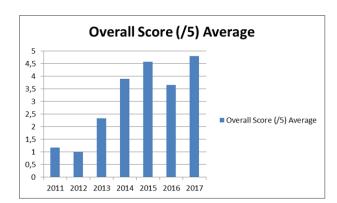
CO2 footprint for the product (simplified calculation with specific methodology) Natural resources preservation evaluation Eco-design

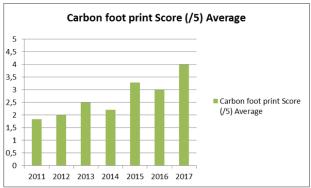
The marks are in a 5 basis and are displayed in the shops and the website.

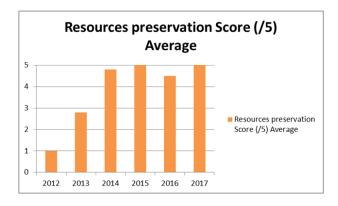
Result:

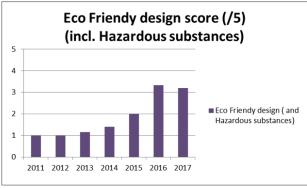
ATLINKS keeps the track of record for 6 years.

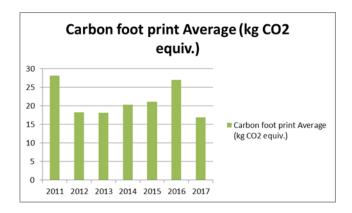












8.7 CONFLICT MINERALS TRACEABILITY



ATLINKS is not a manufacturer, but we have been questioning our vendors on the use of some metals like: Gold, Silver and Tin.

In this process there is also the concept of Origin of Rare metals, and its traceability.

We are putting in place a process to request the traceability for information to main suppliers of fixed and mobile phones (top 5 of our purchase value), to the following metals origin: Gold, Tin, Tungsten, Tantalum (3TG) and Cobalt.



our study

Process:

- Conflict Mineral Reporting Templates based on Responsible Minerals initiative, are sent to our vendors once every two years.
- 2. We question main vendors
- 3. Collection of data and analysis
- 4. Record the information on our Documentation System.

Result:

• We have received the completed CMRT questionnaire 100% fulfilled, for the 6 main suppliers representing 98% of our sales worldwide in 2021.

	Supplier 1	Supplier 2	Supplier 3	Supplier 4	Supplier 5	Supplier 6
Is any 3TG intentionally added or use in the products or in the production process? (*)						
Tantalum (*)	Yes	Yes	Yes	Yes	No	No
Tin (*)	Yes	Yes	Yes	Yes	Yes	Yes
Gold (*)	Yes	Yes	Yes	Yes	Yes	Yes
Tungsten (*)	Yes	Yes	Yes	Yes	No	No
2) Does any 3TG remain in the product? (*)	163	103	163	163	NO	NO
Tantalum (*)	Yes	Yes	Yes	Yes	-	-
Tin (*)	Yes	Yes	Yes	Yes	Yes	Yes
Gold (*)	Yes	Yes	Yes	Yes	Yes	Yes
Tungsten (*)	Yes	Yes	Yes	Yes	-	-
3) Do any of the smelters in your supply chain	163	165	1.65			
source the 3TG from the covered countries? (*)						
Tantalum	No	Yes	No	No	-	-
Tin (*)	No	Yes	No	No	No	Yes
Gold (*)	No	Yes	No	No	No	Yes
Tungsten	No	Yes	No	No	-	-
l) Do any of the smelters in your supply chain		100	1.0			
ource the 3TG from the conflict-affected and high- isk areas?(*)						
Tantalum	No	Yes	No	No	-	-
Tin (*)	No	Yes	No	No	No	No
Gold (*)	No	Yes	No	No	No	No
Tungsten	No	Yes	No	No	-	-
5) Does 100 percent of the 3GT (necessary to the						
functionalisty or production of your products)						
originate from recycle or scrap sources? (*)						
Tantalum	No	No	No	No	-	-
Tin (*)	No	No	No	No	No	No
Gold (*)	No	No	No	No	No	No
Tungsten	No	No	No	No	-	-
i) What percentage of relevant suppliers have provided a response to your supply chain survey?						
*)						
	100%	100%	100%	100%	-	-
Tantalum			100%	100%	100%	100%
	100%	100%	100 /0		10070	
Tantalum	100% 100%	100%	100%	100%	100%	100%
Tantalum Tin (*)						100%
Tantalum Tin (*) Gold (*) Tungsten 7) Have you identified all the smelters supplying	100%	100%	100%	100%	100%	
Tantalum Tin (*) Gold (*) Tungsten 7) Have you identified all the smelters supplying the 3TG to your supply chain? (*)	100% 100%	100% 100%	100% 100%	100% 100%	100%	-
Tantalum Tin (*) Gold (*) Tungsten 7) Have you identified all the smelters supplying the 3TG to your supply chain? (*) Tantalum	100% 100% Yes	100% 100% Yes	100% 100% Yes	100% 100% Yes	-	-
Tantalum Tin (*) Gold (*) Tungsten 7) Have you identified all the smelters supplying he 3TG to your supply chain? (*) Tantalum Tin (*)	100% 100% Yes	100% 100% Yes	100% 100% Yes	100% 100% Yes	100% - - Yes	- Yes
Tantalum Tin (*) Gold (*) Tungsten 7) Have you identified all the smelters supplying he 3TG to your supply chain? (*) Tantalum Tin (*) Gold (*) Tungsten 8) Has all applicable smelter information received by your company been reported in this	100% 100% Yes Yes	100% 100% Yes Yes Yes	100% 100% Yes Yes Yes	100% 100% Yes Yes Yes	100%	- Yes Yes
Tantalum Tin (*) Gold (*) Tungsten 7) Have you identified all the smelters supplying the 3TG to your supply chain? (*) Tantalum Tin (*) Gold (*) Tungsten 3) Has all applicable smelter information received by your company been reported in this declaration? (*)	100% 100% Yes Yes Yes Yes	100% 100% Yes Yes Yes Yes	100% 100% Yes Yes Yes Yes	100% 100% Yes Yes Yes Yes	100%	- Yes Yes
Tantalum Tin (*) Gold (*) Tungsten 7) Have you identified all the smelters supplying the 3TG to your supply chain? (*) Tantalum Tin (*) Gold (*) Tungsten 3) Has all applicable smelter information received by your company been reported in this declaration? (*) Tantalum	100% 100% Yes Yes Yes Yes	100% 100% Yes Yes Yes Yes	100% 100% Yes Yes Yes Yes	100% 100% Yes Yes Yes Yes	- Yes Yes	- Yes Yes -
Tantalum Tin (*) Gold (*) Tungsten 7) Have you identified all the smelters supplying the 3TG to your supply chain? (*) Tantalum Tin (*) Gold (*) Tungsten 3) Has all applicable smelter information received by your company been reported in this declaration? (*) Tantalum Tin (*)	100% 100% Yes Yes Yes Yes Yes	100% 100% Yes Yes Yes Yes Yes	100% 100% Yes Yes Yes Yes Yes	100% 100% Yes Yes Yes Yes Yes	100% - Yes Yes - Yes - Yes	- Yes Yes Yes - Yes
Tantalum Tin (*) Gold (*) Tungsten 7) Have you identified all the smelters supplying the 3TG to your supply chain? (*) Tantalum Tin (*) Gold (*) Tungsten 3) Has all applicable smelter information received by your company been reported in this feclaration? (*) Tantalum Tin (*) Gold (*)	100% 100% Yes Yes Yes Yes Yes Yes	100% 100% Yes Yes Yes Yes Yes Yes	100% 100% Yes Yes Yes Yes Yes Yes	100% 100% Yes Yes Yes Yes Yes Yes	100% - Yes Yes - Yes - Yes Yes Yes	Yes Yes Yes Yes Yes Yes Yes Yes
Tantalum Tin (*) Gold (*) Tungsten 7) Have you identified all the smelters supplying the 3TG to your supply chain? (*) Tantalum Tin (*) Gold (*) Tungsten 3) Has all applicable smelter information received by your company been reported in this leclaration? (*) Tantalum Tin (*) Gold (*) Tungsten	100% 100% Yes Yes Yes Yes Yes	100% 100% Yes Yes Yes Yes Yes	100% 100% Yes Yes Yes Yes Yes	100% 100% Yes Yes Yes Yes Yes	100% - Yes Yes - Yes - Yes	- Yes Yes - Yes - Yes
Tantalum Tin (*) Gold (*) Tungsten T) Have you identified all the smelters supplying he 3TG to your supply chain? (*) Tantalum Tin (*) Gold (*) Tungsten Tungsten Tin (*) Fold (*) Tungsten Tantalum Tin (*) Tantalum Tin (*) Gold (*)	100% 100% Yes Yes Yes Yes Yes Yes	100% 100% Yes Yes Yes Yes Yes Yes	100% 100% Yes Yes Yes Yes Yes Yes	100% 100% Yes Yes Yes Yes Yes Yes	100% - Yes Yes - Yes - Yes Yes Yes	- Yes Yes Yes - Yes - Yes - Yes
Tantalum Tin (*) Gold (*) Tungsten 7) Have you identified all the smelters supplying the 3TG to your supply chain? (*) Tantalum Tin (*) Gold (*) Tungsten 8) Has all applicable smelter information received by your company been reported in this declaration? (*) Tantalum Tin (*) Gold (*) Tantalum Tin (*) Gold (*) Tungsten Tungsten Tantalum Tin (*) Gold (*) Tungsten Questions Company related	100% 100% Yes Yes Yes Yes Yes Yes	100% 100% Yes Yes Yes Yes Yes Yes	100% 100% Yes Yes Yes Yes Yes Yes	100% 100% Yes Yes Yes Yes Yes Yes	100% - Yes Yes - Yes - Yes Yes Yes	Yes Yes Yes Yes Yes Yes Yes Yes
Tantalum Tin (*) Gold (*) Tungsten 7) Have you identified all the smelters supplying the 3TG to your supply chain? (*) Tantalum Tin (*) Gold (*) Tungsten 8) Has all applicable smelter information received by your company been reported in this declaration? (*) Tantalum Tin (*) Gold (*) Tungsten Questions Company related A. Have you established a conflict minerals sourcing policy? (*) B. Is your conflict minerals sourcing policy publicly available on your website? (Note – If yes, the user	100% 100% Yes Yes Yes Yes Yes Yes Yes	100% 100% Yes Yes Yes Yes Yes Yes Yes	100% 100% Yes Yes Yes Yes Yes Yes Yes	Yes	- Yes Yes Yes Yes Yes Yes - Yes	- Yes Yes - Yes - Yes - Yes - Yes
Tantalum Tin (*) Gold (*) Tungsten Tantalum Tin (*) Gold (*) Tungsten Tantalum Tin (*) By Have you identified all the smelters supplying the 3TG to your supply chain? (*) Tantalum Tin (*) Gold (*) Tungsten Tungsten Tantalum Tin (*) Gold (*) Tungsten Tantalum Tin (*) Gold (*) Tungsten Tantalum Tin (*) Gold (*) Tungsten Questions Company related Tantalum Tin (*) Gold (*) Tungsten Questions Company related Tantalum Tin (*) Gold (*) Tungsten Tantalum Tin (*) Gold (*) Tungsten Tantalum Tin (*) Gold (*) Tungsten Questions Company related Tantalum Tin (*) Gold (*) Tungsten Tougsten Tougste	100% 100% Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye	100% 100% Yes	100% 100% Yes Yes Yes Yes Yes Yes Yes	100% 100% Yes	- Yes	- Yes Yes - Yes Yes Yes Yes
Tantalum Tin (*) Gold (*) Tungsten) Have you identified all the smelters supplying he 3TG to your supply chain? (*) Tantalum Tin (*) Gold (*) Tungsten) Has all applicable smelter information received y your company been reported in this eclaration? (*) Tantalum Tin (*) Gold (*) Tungsten Questions Company related L. Have you established a conflict minerals ourcing policy? (*) Lis your conflict minerals sourcing policy publicly vailable on your website? (Note – If yes, the user hall specify the URL in the comment field.) (*) Do you require your direct suppliers to source he 3TG from smelters whose due diligence ractices have been validated by an independent hird party audit program? (*)	100% 100% Yes	100% 100% Yes Yes Yes Yes Yes Yes Yes Yes Yes No	100% 100% Yes	100% 100% Yes Yes Yes Yes Yes Yes Yes Yes Yes No	- Yes Yes Yes Yes Yes Yes No	Yes Yes Yes Yes Yes Yes No
Tantalum Tin (*) Gold (*) Tungsten 7) Have you identified all the smelters supplying the 3TG to your supply chain? (*) Tantalum Tin (*) Gold (*) Tungsten Tantalum Tin (*) Gold (*) Tungsten 8) Has all applicable smelter information received by your company been reported in this declaration? (*) Tantalum Tin (*) Gold (*) Tungsten Questions Company related A. Have you established a conflict minerals sourcing policy (*) 3. Is your conflict minerals sourcing policy publicly available on your website? (Note – If yes, the user shall specify the URL in the comment field.) (*) C. Do you require your direct suppliers to source the 3TG from smelters whose due diligence practices have been validated by an independent third party audit program? (*) D. Have you implemented a due diligence measures for responsible sourcing?(*) E. Does your company conduct Conflict Minerals survey(s) of your relevant supplier(s)?(*)	100% 100% Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye	100% 100% Yes	100% 100% Yes	100% 100% 100% Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye	- Yes Yes Yes Yes No Yes	- Yes Yes - Yes Yes - Yes Yes - Yes
Tantalum Tin (*) Gold (*) Tungsten 7) Have you identified all the smelters supplying the 3TG to your supply chain? (*) Tantalum Tin (*) Gold (*) Tungsten Tantalum Tin (*) Gold (*) Tungsten 8) Has all applicable smelter information received by your company been reported in this declaration? (*) Tantalum Tin (*) Gold (*) Tungsten Questions Company related A. Have you established a conflict minerals sourcing policy publicly available on your website? (Note – If yes, the user shall specify the URL in the comment field.) (*) C. Do you require your direct suppliers to source the 3TG from smelters whose due diligence the attempt of the program? (*) D. Have you implemented a due diligence measures for responsible sourcing?(*) E. Does your company conduct Conflict Minerals survey(s) of your relevant supplier(s)?(*) F. Do you review due diligence information received from your suppliers against your company's expectations? (*)	100% 100% 100% Yes	100% 100% 100% Yes	100% 100% 100% Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye	100% 100% 100% Yes	100% - Yes Yes Yes - Yes Yes Yes Yes Yes	- Yes Yes - Yes Yes Yes Yes - Yes Yes In conformance with IPC1755
Tantalum Tin (*) Gold (*) Tungsten 7) Have you identified all the smelters supplying the 3TG to your supply chain? (*) Tantalum Tin (*) Gold (*) Tungsten Tantalum Tin (*) Gold (*) Tungsten B) Has all applicable smelter information received by your company been reported in this declaration? (*) Tantalum Tin (*) Gold (*) Tungsten Questions Company related A. Have you established a conflict minerals sourcing policy? (*) 3. Is your conflict minerals sourcing policy publicly	100% 100% 100% Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye	100% 100% 100% Yes	100% 100% Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye	Yes	100% - Yes Yes Yes Yes Yes Yes Yes Yes	- Yes Yes - Yes Yes Yes - Yes Yes - Yes Yes

9.1 COMMUNITY INVOLVEMENT AND DEVELOPMENT

9.1.1 ELDERLY DEDICATED PRODUCT RANGE

ATLINKS has dedicated 2 brands to develop products for the access of technology to the elderly.

The specific design and functionalities are helping to elderly people for an easier access to communication, and leisure.

By this action we integrate the elderly into the digital society, facilitate the intergenerational communication and give access to information in an adapted way.

Results:

- 2 full ranges of products including fixed line, mobile phones, TV headsets, and hearing aid compatible communication products have been specially developed for this kind of population.
- 2 brands dedicated to elderly people.

9.1.2 EMMAÜS- JUNE 2019



Since many years we donate to Emmaüs some of our stock of product.

ATLINKS Europe donated over **119 phones** in perfect working conditions to be sold in the "solidarity day sales" organized by Emmaüs in Paris in 2019. Since 2020 the event did not take place due to the pandemic.

Emmaus (Emmaüs) is an international solidarity movement founded in Paris in 1949 by friar Abbé Pierre to combat poverty and homelessness. Group of associations present in 39 countries.



9.1.3 TÉLÉTHON: OCTOBER TO DECEMBER 2022



Since 2015 every end of the year and in collaboration with Screlec, ATLINKS team participate at a special collection of batteries in our premises for giving a donation to the *Téléthon*. 18 kilograms of batteries and accumulators are collected by the contribution of the Europe employees.

Téléthon is a televised fundraising event that lasts many hours or even days, the purpose of which is to raise money for medical research in the domain of rare sickness.



9.1.4 NOVEMBER WITHOUT SMOKING



ATLINKS sticks to the French campaign to *fight against the smoking* habit. Awareness Display has been put all over the French office as well as in the building (even it is not strictly ATLINKS' responsibility): elevator, entrance hall.



9.2 ANTI-COMPETITION AND RESPONSIBLE MARKETING



ATLINKS protects and respects the intellectual property by means of contractual commitment with suppliers and customers.

Specific legal counsel support is assigned whenever necessary for ensuring these aspects.

Result:

0 reports on anti-competition by any stakeholder

Our Customer Service it is open to contact with final customers by different means: standard mail, e-mail, phone, etc. We put at customer disposition also a Hot line to help customer with any difficulties or information required.

We answer to any question whenever customers ask to us, providing satisfactory service not only with our products but with any information regarding our practices.

We do have *Customer Complaints procedure* that covers all questions in quality, environment, or CSR issues.

Result:

- Most of the customer letters or emails are inquiries or request for documentation.
- No CSR issues reported this year.

9.3 CSR SUPPLIERS – AUDITS

Our Product Manufacturing suppliers are one of our main stakeholders and are considered as partners by ATLINKS. We do have a long relationship with most of them, but we are always in the move of qualifying new partners for new kind of products.

ATLINKS has a *Manufacturing Supplier Code of Conduct*, to which every supplier must stick to compliance. This Code of Conduct covers all the domains where ATLINKS require attention: Compliance, Human Rights, Child Labor, REACH and RoHS, Environment, Health and Safety, among other requirements.

17 PARTNERSHIPS FOR THE GOALS

Our Suppliers Selection and Evaluation process is running for many years, and we do have an excellent track of record for all of them.

We do request to them to have different Certified Management Systems: Quality and Environmental; and to achieve the maximum of our confidence, a Health and Safety Management Systems, and a Social Accountability Management System.

We also monitor by audits the compliance with the RoHS and REACH regulations to avoid hazardous and prohibited substances in our products (already reported above in this document).

The Selection and Evaluation is based in many criteria, and apart for most of the Quality, Financial, and Operational, we also include Corporate Social Responsibility, listed in the Manufacturing Suppliers Code of Conduct.

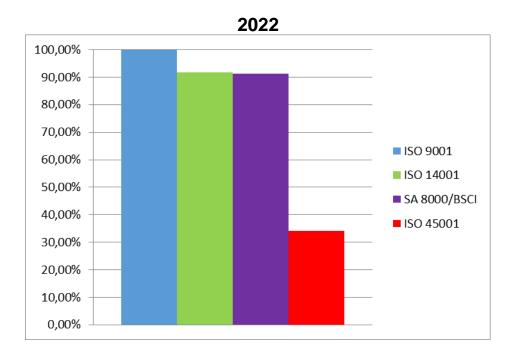
We do perform every year a complete Evaluation on those criteria for 100% of our Product Suppliers.

Whenever a supplier is not more in our standards and it is not capable to provide the appropriate corrective actions, we can disqualify them.

Results:

- Percentage of Suppliers who has signed the Supplier Code of Conduct: 100%
- Other Certifications of Suppliers:

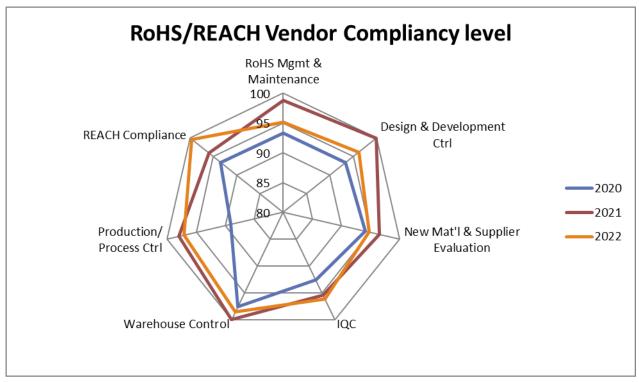
Percentage of Purchased products Worldwide (value) coming from Certified Suppliers, holding different kinds of Certifications.

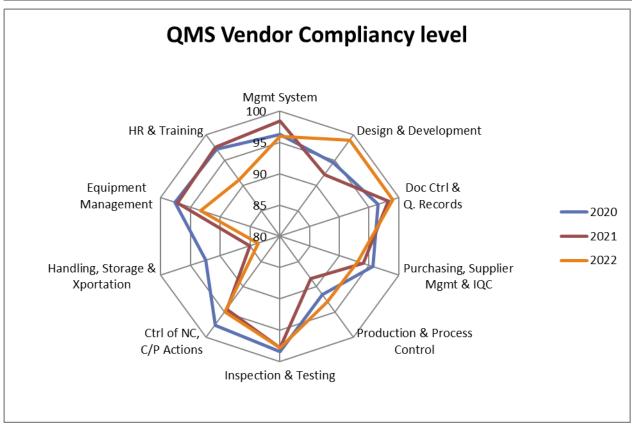


Percentage of Manufacturing Suppliers Audited

- Audits QMS: 100% of active vendors
- Audits EHS-CSR: 100% of active vendors
- Audits RoHS/REACH: 100% of Active vendors (shown in previous pages)

Results on Audits: Quality and EHS-CSR





9.4 EXTERNAL EVALUATIONS (ECOVADIS)

EcoVadis operates the 1st collaborative platform allowing companies to assess the environmental and social performance of their suppliers on a global basis. EcoVadis combines technology and Corporate Social Responsibility (CSR) expertise to deliver simple and reliable supplier scorecards, covering 150 purchasing categories and 21 CSR criteria.

The EcoVadis methodology framework assesses the policies and measures put in place as well as the reporting published by companies with regards to environmental, labor practices & human rights, fair business practices and sustainable procurement issues. The assessment conducted by CSR experts is made based on the company answers to a survey which is dynamically adapted to their country, sector and size, on the basis of supporting documentation, and on public and stakeholder (NGOs, trade unions, press) information.

ATLINKS is framed in the Category/Industry "Manufacture of communication equipment", even it has not its own manufacturing facilities, the products commercialized by ATLINKS have its own brands Swissvoice, Amplicomms and a licensed brand Alcatel, and then it can be considered as a manufacturer.

This category is much more demanding than the "wholesaler" type.

Actions based on the detailed report issued by EcoVadis have been taken to improve ATLINKS performance in the CSR results for next year.

Result:

1.-ATLINKS has confirmed its commitment to the Corporate Social Responsibility by obtaining the **Platinum level of recognition** in 2022.



2.- EcoVadis Awards

For the 5th year in a row, ATLINKS has obtained the **highest score in its category**, **and its area** being awarded for it.

March 2022	March 2021	March 2020	March 2019	April 2018	May 2017
Winner of the	Winner of the	Best performer	Winner of the	Winner of the	Winner of the
Sustainability	Sustainability	worldwide in the	Sustainability	Sustainability	Sustainability
Leadership Best	Leadership Best	category	Leadership Best	Leadership	Leadership
Regional	Regional	"Advanced	Regional	Best Regional	Regional
Performance	Performance	Manufacturing"	Performance	Performance	Award AMEA,
Award (AMEA)	Award (China)		Award (China),	Award	for the best
			for the best score	(China), for	score in the
	Best performer		in the area	the best score	area among
	worldwide in the		among all	in the area	all different
	category		different activity	among all	activity
	"Advanced		sectors	different	sectors
	Manufacturing"			activity sectors	
on the factors that the state of the state o	Monator de de la composition della composition d	eccovadis Sustainability Leadership Award Small to Redlum Enterprise ***Description Advanced Muslandering ATLINGS HOLDINGS TO (GROUP) ***Resh 2009	the control of the co	ecovodis	Becoveries
https://resources.ecovadis.com/bl og/small-and-medium-sized- businesses-sustainablitty- leadership-award-winners- sustain-2022	Sustainability Leadership Award Winners. Sustain 2021 (ecovadis.com)	https://resources.ecovadis.com/su stain-conference/sustainability- leadership-awards-sustain-2020	https://resources.ecovadis.com/new s-press/ecovadis-announces- winners-of-2019-sustainable- procurement-leadership-awards-2	https://resources.ecovadis.co m/news-press/ecovadis- announces-winners-of-2018- sustainable-procurement- leadership-awards	https://resources.ecovadis.c om/news-press/ecovadis- announces-winners-of-first- ever-sustainability- sustainable-procurement- leadership-awards

10 ANNEXES

10.1 COMPANY POLICY



Atlinks designs, develops, markets and sells voice, video, multimedia and elderly-dedicated communication terminals, to operators and to professional and consumer retail sales channels all around the world

The company is committed to:

- Create value for its customers by consistently providing products and services that meet or exceed Customer's expectations as measured by:
 - Product Innovation and Performance
 - Delivery Commitment
 - Price Competitiveness
- 2.- Implementing programs and procedures with an intent to meet or exceed all applicable Laws and Regulations regarding Products, Environment, Occupational Health and Safety and Information Security; and other requirements from stakeholders to which Atlinks subscribes.
- 3.- To the protection of the environment and its employees, by putting in place the best management practices for **Prevention** of Pollution at its source, Injury and ill Health of its employees and stakeholders, involving employees and their representatives on the risks identification, and to protect the confidentiality, integrity and availability of our Information Systems.

To assure ongoing progress, the company will focus on five areas:

People

- Encourage Innovation, Enhance Leadership and Promote Teamwork
- Act with clarity, integrity and honesty, Respect the Information Security rules
- Providing Safe working conditions and encourage our suppliers to do so
- Look after the health to the business contributors
- Respect and make respect the human rights

External Relations

- Satisfy customer's expectations
- Continuously benchmark with competition
- Develop close partners relationships with stakeholders with respect of Quality, Environment, Health and Safety and Information security

Environmental

- Improve the Products' environmental impact together with our suppliers
- Transportation optimization

Social and Ethics

- Develop the culture of Social Accountability inside Atlinks and to its stakeholders
- Promoting the Code of Conduct and fight against corruption

Measurements and Progress

- Monitor with key measurements
- Progress by following stakeholders' feed back
- Focus on continual improvement

I undertake to allocate the necessary resources to implement this Policy, to follow up its efficiency and effectiveness and to communicate internally the importance of the Customer and stakeholders' expectations, Environment respect, Safety for employees and stakeholders, Information Security and Regulatory Rules, and to identify and minimize any risk.

I appoint the QHSE-CSR Management System representative, to promote this Policy, and to safeguard the customer's satisfaction within the company.

December 2022

QPOL QUA_WW_002_CH_V10_DEC 2022

C. H. TONG - CEO

10.2 CODE OF CONDUCT

SUMMARY - CODE OF CONDUCT

The ATLINKS Code of Conduct outlines expected behaviors for all ATLINKS employees and consultants. A complete **handbook** and **tools** are available to properly implement this policy.

ATLINKS will conduct its business fairly, impartially, in an ethical and proper manner, in full compliance with all applicable laws and regulations, and consistent with the ATLINKS Policy.

In conducting its business, **integrity** must underlie all company relationships, including those with customers, suppliers, and communities and among employees.

The highest standards of **ethical business conduct** are required of ATLINKS employees in the performance of their company responsibilities. Employees will not engage in conduct or activity that may raise questions as to the company's **honesty**, **impartiality**, **reputation** or otherwise cause embarrassment to the company.

Any employee of ATLINKS Company will ensure that:

- ➤ He/She will not engage in any activity that might create a **conflict of interest** for him/her or the company.
- ➤ He/She will not take advantage of his/her ATLINKS position to seek personal gain through the inappropriate use of ATLINKS or non-public information or abuse his /her position.
- ➤ He/She will follow all restrictions on use and disclosure of information.

 This includes following all requirements for **protecting ATLINKS information** and ensuring that non-ATLINKS proprietary information is used and disclosed only as authorized by the owner of the information or as otherwise permitted by law.
- > He/She will observe fair dealing in all of his/her transactions and interactions.
- ➤ He/She will remain **politically neutral** and avoid making political contributions on behalf of ATLINKS.
- > He/She commits to prevent **bribery**.
- > He/She will protect all company, customer and supplier assets and use them only for appropriate company-approved activities.
- > Without exception, He/She will comply with all applicable laws, rules and regulations.
- ➤ He/She will promptly **report any illegal or unethical conduct** to management or other appropriate authorities (i.e., Ethics, Law, Security,..).

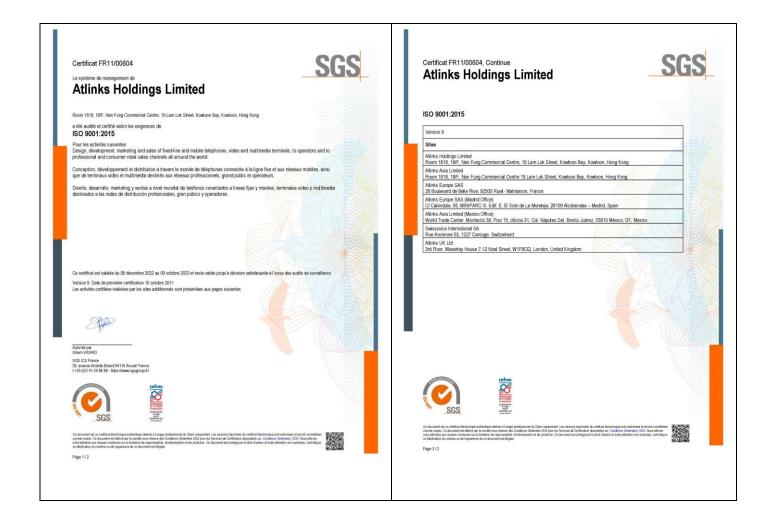
Every employee has the responsibility to ask questions, seek guidance, and report suspected violations of this Code of Conduct.

ATLINKS provide training to all employees and consultants based on the United Nations Convention Against Corruption.

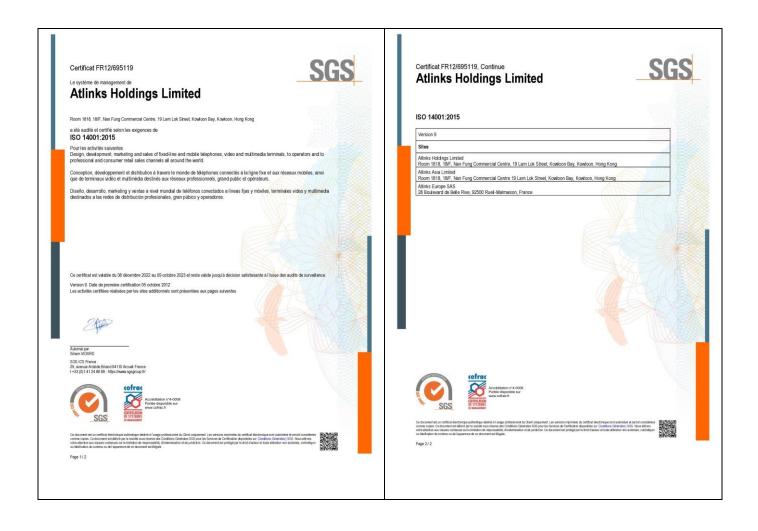
This document is a summary of the Internal Control "Code of Conduct", dated 1/08/2017

10.3 CERTIFICATES

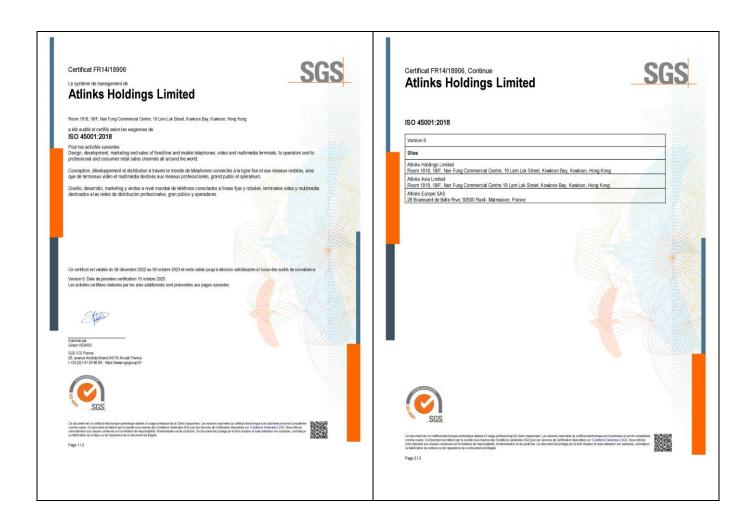
QUALITY MANAGEMENT SYSTEMS



ENVIRONMENTAL MANAGEMENT SYSTEMS



OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT SYSTEMS



CSR EVALUATION

ecovadis

ATLINKS HOLDINGS LTD (GROUP)

has been awarded a

Platinum medal

as a recognition of their EcoVadis Rating

-OCTOBER 2022-



You are receiving this score/medal based on the disclosed information and news resources available to EcoVadis at the time of assessment. Should any information or circumstances change materially during the period of the scorecard/medal validity, EcoVadis reserves the right to place the business' scorecard/medal on hold and, if considered appropriate, to re-assess and possibly issue a revised scorecard/medal.

Valid until: October 2023

10.4 SDG Results



	Contributed Brooks and Contri		0	Addisha Asstance	Addish Toward	2022 Fundamental
1	Sustainable Development Goal No poverty	#	Goal Target	Atlinks Actions	Atlinks Target	2022 Evaluation
2	Zero Hunger					
		3.8	Achieve universal health coverage, including financial risk protection, access to quality essential	Insurance	100% of employees with insurance	100% insurance
		3.8	health-care services and access to safe, effective, quality and affordable essential medicines and vaccines for all	Medical Checks	100% of employees medical checks as per regulations requirements. 100% of vendors audited on H&S. Over 90%	100% are following the plan of medical checks
	Good Health and Well-being	3.8	Strengthen the capacity of all countries, in	Suppliers Health and Safety assessment	compliancy	100% audited, 96,33% compliancy
		3D	particular developing countries, for early warning, risk reduction and management of national and global health risks. Strengthen the implementation of the World	Health and Safety programs	0 Accidents	0 Accidents
		3A	Health Organization Framework Convention on Tobacco Control in all countries, as appropriate.	Non smoking November campaign	1 month follow goverment campaign	Nov 2022 French " Non smoking Campaign"
				Drivers security training and engament	100% of eployees using company car signed chart and received training.	100% drivers employees signed chart Training: 100% in France, 100% in Spain
		3.3	By 2030, end the epidemics of AIDS, tuberculosis, malaria and neglected tropical diseases and combat hepatitis, water-borne diseases and other communicable diseases.	Contribution to Téléthon	Donation of batteries to Screlec/Téléthon	Collection in Nov and Dec 2022
4	Quality Education	4.7	By 2030, ensure that all learners acquire the knowledge and skills needed to promote sustainable development, including, among others, through education for sustainable development and sustainable lifestyles, human rights, gender equality, promotion of a culture of peace and non- violence, global citruship and appreciation of cultural diversity and of culture's contribution to sustainable development.	Training and Awareness	90% of Training plan fulfilled	Hong Kong Training plan completed France serveral trainings proposed and done
	Gender Equality	5.1	End all forms of discrimination against all women and girls everywhere	Balance female/male age pyramid	50%/50%	50% /50%
6	Clean Water and Sanitation		and gard everywhere			
7	Afordable and clean Energy					
8	Decent work and Economic growth	8.7	Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour,	Child labor	100% Compliance in audits for Child and Foreced labor	100% Compliancy
		8.7	including recruitment and use of child soldiers, and by 2025 end child labour in all its forms	Forced and compulsory labor	100% Compliance in audits for Child and Foreced labor	100% Compliancy
		8.7		Conflict Minerals Traceability	5 main Product manufactures questionned every 2 years	6 main manufactures questioned in 2021 Questioned
9	Industry Innovation and infrastructure			Development of an Elderly product range	2 brands product range dedicated to Elderly people. Integration in technologies.	Swissvoice and Amplicomms brands launched and running
	Reduce Inequalities		By 2030, empower and promote the social, economic and political inclusion of all, irrespective	Non discrimination nationalities, female	Diversity	4 nationalities, half of the staff female
		10.2 10.2	of age, sex, disability, race, ethnicity, origin, religion or economic or other status	Handicap Contribution to Emmaüs	Yearly Contribution to handicap	2 h of handicap worker No contribution in 2022, since no Salon due to
11	Sustainable cities and comunities	10.2		Contribution to Emmaus	Yearly Contribuition to housing and integration	pandemics
11	Sustainable cities and comunities	12.2		Paner consumntion	Reduce paper cosumption	-6,3% in HK and +10,7% in France
	Responsible consumption and production			Electricity consumption	Reduce Electricity consumption	-32% in France, +3,8% in Hong Kong
		12.4		Waste management at office	Reduce the waste production /less consumption	Less waste in FR since collected by he city hall services
		13.2		Tranportation	Inbound: 100% of container fulfillment, outbound: decrease the CO2 per product transported	Inbound: 95%, Outbound: change calculation
		13.2		Eco design	Over 50% of recycled carboard 100% mineral oils free ink	89% Recycled cardboard 100% mineral oils free inks
13	Climate Action	13.2	Integrate climate change measures into national policies, strategies and planning	Product end of life. Recycling	Compliant with the producers plans in Europe	100% compliant
		13.2		Suppliers Environmental assessment	100% of Suppliers Audited on Environmental aspects, 90% compliancy.	100% of Suppliers Audited on Environmental aspects, 95,77% compliancy.
14 15	Life Below water Life on land					
		16.7	Ensure responsive, inclusive, participatory and	Freedom of Association	Associations representatives	Elections in France, but not candidates in 2020
16	Peace Justice and Strong Insitutions	16.7	representative decision-making at all levels	Collective Bargain	Elected representatives - CSE in France	Regular meetings with Staff.
		16.5	Substantially reduce corruption and bribery in all their forms	Anticourrption training and tools	100% of employees/consultants/agents trained	58% Certificates of training
				Anticompetion and responsible marketing	No complains	NO complains
17	Partership for the Goals	17.16	Enhance the global partnership for sustainable development, complemented by multi-stakeholder partnerships that mobilize and share knowledge, 5 expertise, technology and financial resources, to support the achievement of the sustainable development goals in all countries, in particular	CSR suppliers audits	100% of Suppliers Audited on CSR aspects	100% suppliers audited 97,18% compliancy

10.5 EMISSIONS CO2eq

CO2 eq		2020		2021		2022	
Total Scope 1-2 3	Tones CO2 eq	27321,34	42%	29620,44	8%	22159,33	-25%
Total Scope 1 - Direct		0	0%	0	0%	16	0,07%
Total Scope 2 - Indirect		37,82	0,14%	34,56	0,12%	14,82	0,07%
Total Scope 3 - Indirect		27283,53		29585,89		22128,57	
Scope 3 Upstream		27560,92	100,88%	29860,00	100,81%	22368,55	75,52%
Scope 3 Downstream		-277,39	-1,02%	-274,12	-0,93%	-239,98	-1,08%
	kg CO2/ k€	1248,46	40%	938,51	-25%	782,33	-17%