



Alcatel-Lucent Enterprise Environmental, Social and Governance Report 2024

Table of Contents

Executive summary.....	4
Our sustainability strategy	4
The eight domains of ALE's ESG strategy	4
Our vision for the future.....	5
CEO statement - Yann Zhang.....	6
Global Operations & Sustainability Officer statement - Rasheed Mohamad	7
1. About this report	8
2. About ALE	8
3. ALE sustainability strategy	9
3.1 Process to determine material topics (GRI 3-1).....	9
3.2 ALE ESG strategy.....	13
4. ALE ESG governance	14
4.1 Governance structure.....	14
4.2 ESG policies.....	15
4.3 External standards and commitments	16
4.4 Scope and application	16
4.5 Implementation and oversight.....	16
4.6 Communication and review.....	16
5. ALE ESG transformation roadmap.....	16
6. Environmental sustainability	17
6.1 Environmental impact, risks and opportunities.....	17
6.2 Environmental transition plans	17
7. Social responsibility.....	27
7.1 Social impact, risks and opportunities.....	27
7.2 Our employees.....	27
7.2.1 Employment	27
7.3 Diversity, Equity & Inclusion	32
7.4 Human rights.....	34
8. Corporate governance	35
8.1 Governance impact, risks and opportunities	35
8.2 Data privacy and security.....	35
8.3 Sustainable business strategy and risk management	37
8.4 Business ethics, compliance and transparency.....	38
8.5 Sustainable procurement	39

9. ESG targets, KPI and 2024 progress	41
10. Conclusion	42
Annex	44
1. GRI Content Index Table	44
2. Glossary	47
3. Impacts, risks and opportunities	48
4. GRI report: GHG emissions	50
5. GRI Report: Energy	52
6. GRI Report: Waste	53
7. GRI Report: Ethics.....	54

Executive summary

Alcatel-Lucent Enterprise is committed to delivering technology solutions that empower customers, connect people and processes and create a more sustainable future for all. Guided by our vision to provide customized technology experiences and our mission to make everything connect—whether in the cloud, on-premises or hybrid—we embed sustainability at the core of our business and operations.

Our sustainability strategy

Sustainability is a strategic priority for ALE, rooted in our culture and values of speed, agility, customer centricity and reliability. We recognize that integrating Environmental, Social and Governance (ESG) principles throughout our value chain is essential to building long-term resilience, trust and value for all stakeholders. In 2024, we advanced our ESG journey by aligning with leading frameworks such as the Global Reporting Initiative (GRI) and the Corporate Sustainability Reporting Directive (CSRD) and by conducting a robust Double Materiality Assessment (DMA) to identify our most significant impacts, risks and opportunities.

Our ESG governance structure ensures engagement at every level, with oversight from dedicated committees and advisory boards and a focus on continuous improvement, accountability and inclusivity. We have formalized our commitments through comprehensive policies that align with international standards, including the UN Global Compact, UN Guiding Principles on Business and Human Rights and the Science Based Targets initiative (SBTi).

In 2024, our internal Game Changer team developed a strategic methodology for business departments to discuss, assess and rank their Impact, Risks and Opportunities (IROs) for materiality. Based on their engagement across all functions of ALE business, 63 materials IROs have been agreed upon and form the backbone of our action plans.

The eight domains of ALE's ESG strategy

Our sustainable business strategy is anchored in eight core ESG domains, emanating from the materials IROs. For each of the eight core domains, we have set clear objectives and targets for 2030. Already good progress and clear directions can be shared:

- Climate Change Mitigation: Driving decarbonization through science-based targets, energy efficiency, eco-design and supplier engagement, with a 20% reduction in global emissions since 2022 and a validated SBTi pathway
- Product Environmental Adaptation: Launching Life Cycle Assessments (LCAs) and Environmental Product Declarations (EPDs) to reduce product impacts and support a circular economy
- Human Rights: Upholding human rights across our operations and value chain, guided by international frameworks and proactive risk assessments
- Labor Practices and Employee Development: Investing in fair working conditions, continuous learning and employee well-being, while harmonizing HR best practices globally
- Diversity, Equity and Inclusion (DEI): Fostering a culture of respect, representation and equal opportunity and celebrating initiatives like "Together For All" and ALE Equality Day
- Business Ethics, Transparency and Compliance: Maintaining the highest standards of integrity through robust compliance programs, regular training and transparent reporting
- Data Privacy and Security: Ensuring digital trust through rigorous data protection, cybersecurity certifications and alignment with evolving regulations
- Strategy and Risk Management: Integrating ESG into business strategy, risk management and operational decision-making to ensure resilient, sustainable growth

Our vision for the future

ALE's vision is to lead by example and help shape a sustainable, fair and resilient future. Our technology is a key enabler for sustainability transformation, supporting customers in their own journeys through smart building solutions, cloud services and collaborative partnerships. We are committed to continuous improvement, transparent engagement with stakeholders and delivering measurable progress toward our ESG goals.

Together with our teams, partners and customers, ALE is building a future where technology and sustainability drive shared success and positive impact for people and the planet.

CEO statement - Yann Zhang



At ALE, responsibility is not a trend—it's part of who we are. Social responsibility and business ethics have always been embedded in our culture, guiding how we operate, collaborate and innovate.

Today, as global challenges intensify, ESG is more than a framework—it's a strategic lever for long-term resilience. We see it as an opportunity to future-proof our business while strengthening the ecosystems we are part of. Integrating environmental, social and governance considerations across our value chain helps us stay focused on what truly matters: trust, transparency and impact.

But our ambition goes further. As a technology company, we believe that our solutions can play a critical role in helping our clients become more resilient too, enabling smarter, more sustainable and more inclusive outcomes.

We aim not only to lead by example, but to help shape the path forward—proving that innovation and responsibility go hand in hand. Together, with our teams, partners and customers, we are committed to building a more resilient, fair and sustainable future.

Yann Zhang

Chief Executive Officer
Alcatel-Lucent Enterprise

Global Operations & Sustainability Officer statement - Rasheed Mohamad



ESG is ALE's strategic priority. It reflects our deeply rooted values and our ambition to build resilience for ourselves and our clients in a fast-evolving world.

By aligning with leading regulatory frameworks, including the Corporate Sustainability Reporting Directive (CSRD), we have embraced the principle of double materiality to identify the eight ESG domains most critical to our business and stakeholders. This structured approach allows us to focus our efforts where they can have the most meaningful impact.

On the environmental front, our transition to a low-carbon model is well underway. We are driving progress through eco-design, supplier engagement, energy efficiency measures and the development of circular economy initiatives. In 2024, the SBTi validated our near- and long-term targets.

Currently, many suppliers are ISO 14001 certified. We plan to achieve ISO 14001 certification for our own operations by 2026.

On the social side, we are reinforcing our commitment to human rights across our entire value chain. We continuously enhance employee development, labor practices and diversity, equity and inclusion (DEI), which are essential to a thriving, future-ready organization.

From a governance perspective, we maintain the highest standards of ethics, compliance and information security. Our ESG strategy is integrated into our business decisions, with a focus on impact analysis, risk management and value creation opportunities.

We firmly believe that sustainability and performance go hand in hand—and we are committed to advancing both, together with all actors across our value chain, from suppliers to clients.

Rasheed Mohamad

Global Revenue and Operations Officer
Alcatel-Lucent Enterprise

1. About this report

This document reports on Alcatel-Lucent Enterprise's sustainable activities from January 1, 2024, to December 31, 2024. It is updated every year and published at the end of Q2 in the following year.

It concerns all entities under ALE Group Holding except for specific notes, which are included in the organization's financial reporting.

This report was initiated by the ALE Sustainability and Transformation Director, who identified a reporting edition task force. The ESG development center compiled all content. The final document has been reviewed by the ESG development committee and ALE ESG external advisory consultant, Future Planet. It has been validated by the ESG Council.

The targeted audience is external stakeholders who are interested in ALE's engagement and progress towards ESG transformation.

This is the second time ALE has published its sustainability activities report. This year, the report's structure follows GRI standards issued by the Global Reporting Initiative in 2021.

If you have any questions related to this report, please contact Sébastien Juras, ALE Sustainability & Transformation Director, at sebastien.juras@al-enterprise.com.

2. About ALE

Empowering the future: Trusted technology, sustainable impact

Alcatel-Lucent Enterprise delivers secure, innovative networking and communication solutions that help organizations across all sectors enhance operational efficiency and competitiveness—in the cloud, on premises or in hybrid environments. All ALE solutions are designed with built-in security, low environmental impact and full compliance with national and international data protection and sovereignty standards.

With over 100 years of technological innovation, Alcatel-Lucent Enterprise is a trusted advisor to more than 1 million customers worldwide. Headquartered in France and supported by a network of 3,400 business partners with a worldwide scope, ALE offers global reach with a strong local presence.

Our Vision and Mission are to deliver customized technology experiences tailored to the needs of each customer and to make everything connect by providing digital-age networking, communication and cloud solutions, combined with services designed for business success.

These values lead us:

- **Speed and agility:** We prioritize simplicity and efficiency to benefit customers, partners and employees.
- **Customer centricity:** Our customers and partners are our priority. We listen, understand and care.
- **Reliability:** We are accountable for our actions and build trust-based relationships.

Sustainability at the core

ALE is driven by a deep commitment to environmental sustainability, social responsibility and corporate governance—the key tenets of ESG. Our technology is designed to serve the environment, people and business, creating a positive impact at every level. We offer flexible business models tailored to each customer's industry—from small and medium businesses to large enterprises—while ensuring secure, sustainable solutions that connect people, machines, processes and data.

GRI Standard	Category	Details
GRI 2-1	Organization name	The official legal name of the company is ALE International, which operates under the Alcatel-Lucent Enterprise brand.
GRI 2-1	Primary activities, business sectors and principal products/services	We provide secure networking and communication solutions that enable organizations and industries to accelerate their operational efficiencies and competitiveness. In the Cloud. On Premises. Hybrid.
GRI 2-1	Headquarters location	ALE International pour Alcatel-Lucent Enterprise, 32 Avenue. Kléber, 92700 Colombes, France
GRI 2-1	Countries of significant operations	ALE operates on a worldwide scope, with France and Germany being the two major countries.
GRI 2-1	Markets served	ALE addresses the B2B space, serving private and public-sector organizations of all sizes—from small and medium-sized businesses (SMBs) to large enterprises. Key verticals include public sector, hospitality, healthcare, transportation, education, manufacturing, energy and utilities.
GRI 2-1	Entities included in sustainability reporting	ALE Group

3. ALE sustainability strategy

3.1 Process to determine material topics (GRI 3-1)

3.1.1 Use of Sector Standards for sector preview

ALE applied the relevant GRI Sector Standards and the SASB industry classification standards to ensure all likely material topics for its sector were considered.

Each topic from the Sector Standards was reviewed for its relevance to our products and services across ALE geographies in the value chain.

The figure below shows the initial identified topics for ALE and stakeholders to consider.

1. Environmental	2. Social	3. Governance
<input checked="" type="checkbox"/> E1.2: Climate change mitigation	<input checked="" type="checkbox"/> S1.1: Working conditions	<input type="checkbox"/> G1.6: Corruption and bribery
<input checked="" type="checkbox"/> E5.3: Waste	<input checked="" type="checkbox"/> S2.1: Working conditions	<input checked="" type="checkbox"/> G1.5: Supplier relationships management including payment practices
<input checked="" type="checkbox"/> E1.3: Energy	<input checked="" type="checkbox"/> S2.3: Other work-related rights	<input type="checkbox"/> G1.4: Political engagement and lobbying activities
<input checked="" type="checkbox"/> E5.1: Resources inflows, including resource use	<input checked="" type="checkbox"/> S1.3: Other work-related rights	<input checked="" type="checkbox"/> G1.1: Corporate culture
<input type="checkbox"/> E5.2: Resource outflows related to products and services	<input checked="" type="checkbox"/> S1.2: Equal treatment and opportunities for all	<input type="checkbox"/> G1.2: Protection of whistle-blowers
<input type="checkbox"/> E2.7: Microplastics	<input checked="" type="checkbox"/> S2.2: Equal treatment and opportunities for all	<input type="checkbox"/> G1.3: Animal welfare
<input checked="" type="checkbox"/> E3.1: Water	<input checked="" type="checkbox"/> S4.1: Information-related impacts for consumers and/or end-users	
<input type="checkbox"/> E1.1: Climate change adaptation	<input type="checkbox"/> S4.3: Social inclusion of consumers and/or end-users	
<input checked="" type="checkbox"/> E2.2: Pollution of water	<input type="checkbox"/> S4.2: Personal safety of consumers and/or end-users	
<input type="checkbox"/> E2.6: Substances of very high concern	<input checked="" type="checkbox"/> S3.1: Communities' economic, social and cultural rights	
<input checked="" type="checkbox"/> E2.5: Substances of concern	<input type="checkbox"/> S3.2: Communities' civil and political rights	
<input checked="" type="checkbox"/> E4.1: Direct impact drivers of biodiversity loss	<input type="checkbox"/> S3.3: Particular rights of indigenous communities	
<input checked="" type="checkbox"/> E2.1: Pollution of air		
<input type="checkbox"/> E4.3: Impacts on the extent and condition of ecosystems		
<input type="checkbox"/> E3.2: Marine resources		
<input type="checkbox"/> E4.4: Impacts and dependencies on ecosystem services		
<input type="checkbox"/> E2.4: Pollution of living organisms and food resources		
<input type="checkbox"/> E4.2: Impacts on the state of species		
<input type="checkbox"/> E2.3: Pollution of soil		

3.1.2 Identification of actual and potential impacts, risks and opportunities

ALE systematically identified both actual and potential negative and positive impacts, risks and opportunities (IROs) on the economy, environment and people, including human rights impacts, across all activities and business relationships. This was achieved through:

- A value chain analysis of the core products to understand where IROs could occur
- A review of ALE policies, operations, products and services to identify sustainability-related IROs
- A review of our competitors' public sustainable promises and targets
- A review of current standards and legislation
- Use of relevant GRI Sector and SASB industry classification standards to ensure sector-specific IROs were considered

3.1.3 Stakeholder and expert input

ALE's process included engagement with a broad range of stakeholders and subject-matter experts (see also GRI2-29 responses), whose views informed the identification and assessment of impacts.

It was our aim to have meaningful engagement. To ensure inclusivity, both internal and external perspectives were solicited to provide a comprehensive understanding of sustainability impacts and priorities.

The engagement was materiality-driven, focusing on the most relevant and significant issues, as determined by stakeholder influence and impact.

3.1.3.1 Stakeholder categories and identification

ALE identified both internal and external stakeholders, including:

- Internal: CEO, Executive Management Team (EMT), management, employees, product line, CSR, Go Green Program
- External: Customers, suppliers, unions, governments, industry associations, communities

Stakeholder groups were mapped through a value chain analysis, considering both direct and indirect business activities. Stakeholders were prioritized using a mapping exercise based on their impact on ALE and ALE's impact on them. We used the European NACE codes classifications and the ESG subtopics from GRI and SASB. This allowed us to identify our core stakeholder groups, map them for importance for both impact materiality (who is affected by ALE) and financial materiality (who affects ALE's financial growth) and prioritize the ones whose perspectives we needed to consider.

3.1.3.2 Stakeholder engagement

The engagement aimed to:

- Gather insights into actual and potential impacts, risks and opportunities (IROs) related to sustainability
- Validate and prioritize material sustainability topics from the perspectives of ALE and its stakeholders
- Ensure inclusivity and that stakeholder perspectives are integrated into ALE's sustainability strategy and reporting
- Ensure that engagement also supported compliance with ESRS and GRI frameworks and informed ALE's strategic roadmap for sustainability

Our stakeholder engagement followed these steps:

- A dedicated DMA working group was established, supported by an executive sponsor, with clear objectives, roles, and deliverables. The process was guided by external experts and internal cross-functional teams.
- Stakeholder groups along the value chain had been identified as part of the value chain analysis: upstream (suppliers), own operations (ALE) and downstream (customers, channel partners, distributors).
- The importance of stakeholder groups was reviewed, scored and ranked based on:
 - Knowledge and impact on ALE's sustainability matters
 - Influence and financial effect on the business
 - Prioritization maps (impact and financial) were created to focus engagement on the most significant groups
- Engagement formats included one-on-one interviews, online surveys (translated for accessibility) and in-person workshops. Depending on the stakeholder group, surveys were tailored for impact or financial materiality.

The team chose to engage with the following aggregated stakeholder groups:

- EMT team (CEO, EMT, CSR Program, Sustainability and Transformation Director) – One-on-one interviews with a total of 10 top-ranked stakeholders
- Customers (end customers, business partners, strategic partnerships) – online surveys - 13 customers provided their feedback.
- Employees (employees, Go Green ALE Program, ALE product line management, ALE operations) – online surveys – 1,267 employees provided feedback
- Suppliers – online surveys – 26 suppliers provided feedback
- Associations – workshops – 4 associations provided their feedback
- Government agencies – online surveys – 3 government agencies provided feedback
- Results from stakeholder engagement were reviewed with the EMT and ESG committee for validation and integration into strategic decision-making. The process was iterative, with feedback loops to ensure ongoing relevance and accuracy.
- The methodology, criteria and outcomes of stakeholder engagement and the full double materiality process were documented for transparency and due diligence. All engagement activities and their impact on materiality assessment were centrally recorded and reported in line with ESRS and GRI requirements.

3.1.4 Assessment and prioritization of impacts, risks and opportunities

All the data feedback was aggregated, analyzed and prioritized based on its significance, considering:

- The scale, scope and likelihood of impacts, risks and opportunities
- The severity and potential for positive or negative outcomes
- Relevance to ALE's business strategy and stakeholder expectations

ALE used a scoring and ranking methodology, supported by expert validation, to prioritize the most significant impacts for reporting.

All stakeholder feedback, scores and weightings were managed on a dedicated platform for aggregation and visualization. Results were used to inform a 4x4 stakeholder matrix and the materiality map.

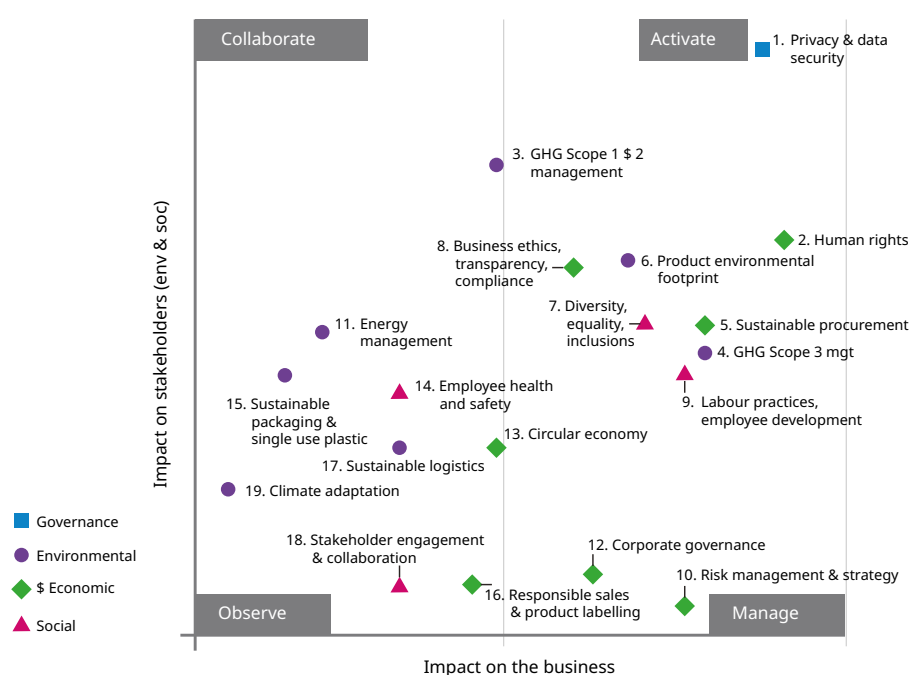
3.1.5 List of identified material sub-topics (GRI 3-2)

ALE compiled and disclosed a list of identified material subtopics resulting from the above process, grouped by relevant categories (e.g., environmental, social, governance). This list was assessed for its impact on ALE's business, the environment and the people around them.

As this was the first time ALE completed a DMA assessment, there were no changes to be reported.

The different stakeholders assessed the subtopics, resulting in the development of the map of importance below.

Materiality Map: The Materiality Map reflects the list of topics that have been deemed of most importance of ALE and our stakeholder groups.



3.1.6 Ongoing review and documentation

At Alcatel-Lucent Enterprise, we recognize that meaningful **stakeholder engagement** is fundamental to the ongoing relevance and success of our ESG strategy. Beyond gathering inputs through surveys, workshops and consultation forums, we are committed to ensuring that stakeholder feedback directly shapes our sustainability priorities and action plans. To that end, we have established a structured feedback loop process where insights from employees, customers, suppliers and community representatives are regularly reviewed by the ESG Committee. This iterative engagement enables us to refine our materiality assessment annually and adjust strategic objectives accordingly.

The outcomes of these engagements—such as identification of core material topics like data privacy concerns and product environmental adaptation—have resulted in targeted initiatives including enhanced cybersecurity protocols and a Life Cycle Assessment (LCA) project for all products starting in 2025.

Alcatel-Lucent Enterprise places significant emphasis on proactively identifying **ESG-related** IROs through a comprehensive and systematic process involving cross-functional teams and the input of external stakeholders. We continuously integrate IRO findings into our enterprise risk management framework and business strategy to ensure opportunities are maximized while risks are mitigated per business entity.

To deepen this integration, we refined our risk governance by establishing dedicated oversight committees that review ESG risks annually, linking them directly to operational decision-making and investment priorities. This ensures that emerging risks such as enhanced regulatory compliance demands or supply chain transparency challenges are addressed through concrete mitigation plans.

Similarly, identified opportunities—such as developing climate-friendly products and expanding circular economy initiatives—are embedded in our innovation pipeline and sustainability targets for 2030. We plan to publish detailed progress reports on these risk management and opportunity realization efforts annually, including specific metrics to demonstrate how stakeholder input continuously shapes our agile response to the evolving ESG landscape.

3.2 ALE ESG strategy

The ALE EMT selected eight core sustainability pillars for the foundation of the sustainable business strategy. For each material sub-topic, ALE has developed transformation plans to manage improvement. This includes relevant policies, actions, targets and monitoring mechanisms for:

1. Climate Change Mitigation
2. Product Environmental Adaptation
3. Human Rights
4. Labor Practices and Employee Development
5. Diversity, Equity and Inclusion
6. Business Ethics, Transparency and Compliance
7. Data Privacy and Security
8. Strategy and Risk Management

ALE eight ESG domains, objectives, targets and timelines

	Environmental sustainability		Social responsibility			Corporate governance		
Topics	Climate Change Mitigation	Product Environmental Adaptation	Human Rights	Labour Practices and Employee Development	Diversity, Equity and inclusion	Business Ethics Transparency and Compliance	Data Privacy and Security	Strategy and Risk Management
Ambition	Reduce GHG emissions across scope 1, 2, and especially scope 3 following science-based targets	Design, manufacture and deliver products and services with the least planetary impact.	Safeguard human rights principles by embedding human rights across our value chain	Provide a safe, flexible, and rewarding work environment that supports talent growth.	Ensure all employees feel valued and respected and are provided with equal opportunities for growth and success.	Uphold the highest standards of business ethics and comply with all regulations.	Establish digital trust with customers, suppliers and partners.	Ensure business resilience and sustainable growth in the ever-evolving telecommunications landscape
2030 targets	< 1.5 °C Contribute to limit global warming following science-based target.	80% Products having a sustainable passport available	100% Commitment to protect human rights at ALE and only partner with companies expressing the same commitment	<6% Employee turnover rate (resignations)	+30% DEI Progression index, reflecting advancements in diversity, equity, and inclusion.	100% Compliance rate and zero tolerance towards any unlawful or unethical behavior.	100% Compliance rate with security & data privacy regulation.	+30% Sustainable and responsible business.
Tech for Good	Optimize resources and energy for our customers while ensuring communications and network services		Provide users with robust and resilient communications services and solutions to support employee development. Enhance and serve the communities where employees, partners and customers live and work			Deliver the highest level of security and privacy services. Deliver solutions working in extreme conditions to support vital connection services.		

Our ESG strategy builds on a strong sense of responsibility rooted in our company's history, aligned with best practices from evolving regulatory frameworks such as the CSRD, as well as third-party ESG assessment programs like EcoVadis.

Since developing our ESG strategy, we have been embedding sustainable performance progress across the ESG spectrum. Please read more in the transformation roadmap section.

On the environmental front, we have been measuring our greenhouse gas emissions since 2022, and in 2024, our reduction targets were validated by the SBTi. By 2025, we aim to launch end-to-end Life Cycle Assessments (LCAs) for all our products and Environmental Product Declarations (EPDs) for selected ones, to better understand and reduce their environmental impact. A transition plan is in place to address these findings. Additionally, our ESG supplier onboarding program ensures that our supply chain contributes to our sustainability goals. All our manufacturing suppliers are ISO 14001 certified, and we plan to implement our own Environmental Management System (EMS) in 2025, aiming for certification in 2026. We also follow ISO 20400 guidelines to embed sustainable procurement practices.

On the social dimension, we are strengthening controls to uphold human rights throughout our value chain and aim to harmonize our HR best practices across all sites. We are also reinforcing internal HR quality assurance processes. We are also committed to continuously improving our DEI practices in, ensuring that our workplace fosters a culture of respect, representation and equal opportunity for all.

From a governance perspective, we are highly focused on regulatory compliance, particularly in the face of rapidly evolving requirements. Given the critical nature of security for our technologies, we are building a sustainable business through systematic analysis of risks and opportunities across our activities.

Finally, we see our technology as a key enabler of sustainability transformation. We are developing new services to help our clients become more sustainable and are working closely with them and our partners to rethink business models. In verticals such as Smart Building, we demonstrate how our technology actively supports the long-term sustainability of our customers.

To ensure the continuation of our commitment, we established a dedicated ESG governance structure to ensure engagement across all organizational levels. The DMA is reviewed annually to remain relevant and aligned with business and societal expectations.

4. ALE ESG governance

4.1 Governance structure

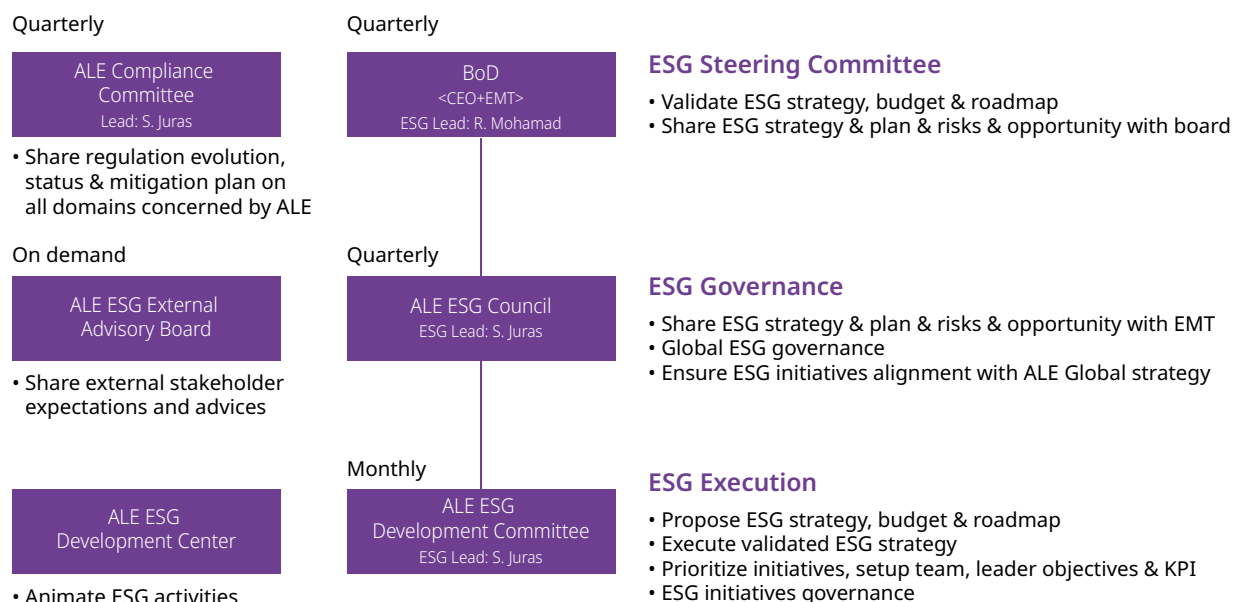
At ALE, we are committed to driving ESG initiatives forward through a carefully structured organizational and governance framework. This framework ensures that ESG principles are integrated at every level of our operations, guiding our transformation into a more sustainable and responsible enterprise.

In 2024, we set up a dedicated Compliance Committee involving all domains where ALE compliance is at stake: Legal, Finance, HR, Ethics, Products, Procurement, Environmental, Security, Export Control). This committee identifies the evolution of regulations, ALE compliance status, risks and mitigation. The committee meets quarterly, sharing updates and risks with the Board.

In 2025, we are taking a significant step forward by establishing an ESG Advisory Board involving our key suppliers and partners. This initiative aims to foster a collaborative environment and ensure that our ESG strategies align with broader industry standards and expectations.

By setting clear, measurable objectives and fostering a culture of accountability and inclusivity, we aim to embed ESG values deeply within our corporate DNA. Our approach is designed not only to execute our ESG strategies effectively but also to ensure that these efforts translate into tangible value for ALE, marking a significant step in our journey towards a comprehensive cultural transformation.

ALE ESG governance bodies



4.2 ESG policies

ALE is committed to conducting its business in a responsible, ethical and sustainable manner. We have formalized our sustainability and ESG commitments through a set of company-wide policies and publicly endorsed principles, which guide our operations, supply chain and stakeholder relationships.

Core ESG policies in place

As ESG is a strategic topic, we have released a dedicated policy to described how ESG is managed in ALE (<https://www.al-enterprise.com/-/media/assets/internet/documents/esg-policy-2025-brochure-en.pdf>).

We maintain the following formalized policies:

Domain	Policy	Scope	Location
All	ESG	ALE Group	https://www.al-enterprise.com/-/media/assets/internet/documents/esg-policy-2025-brochure-en.pdf
All	Code of Conduct	ALE Group	
E	Environmental	ALE Group	https://www.al-enterprise.com/en/legal/code-of-conduct
S	Local Representative	ALE Group	
S	Diversity, Equity & Inclusion	ALE Group	https://www.al-enterprise.com/en/legal/environmental-policy
S	Recruitment	ALE Group	
S	Environmental, Health and Safety	ALE Group	Internal accessibility only
S	Breach of Code of Conduct Reporting	ALE Group	ALE Business Ethics and integrity: how to report breaches to the Code of Conduct

Domain	Policy	Scope	Location
G	Compliance	ALE Group	https://www.al-enterprise.com/en/legal/compliance
G	Anti-Fraud	ALE Group	Internal accessibility only
G	Anti-Corruption	ALE Group	Internal accessibility only
G	Security	ALE Group	Internal accessibility only
G	Privacy	ALE Group	https://www.al-enterprise.com/en/legal/privacy
G	FERPA (Education data)	ALE Group	https://www.al-enterprise.com/en/legal/ferpa-policy
G	HIPAA (Health data)	ALE Group	https://www.al-enterprise.com/en/legal/business-associate-privacy-policy

4.3 External standards and commitments

Our policies are aligned with internationally recognized frameworks, including:

- UN Global Compact
- UN Guiding Principles on Business and Human Rights
- OECD Guidelines for Multinational Enterprises
- ILO Fundamental Conventions
- Science Based Targets initiative (SBTi) for climate action
- Responsible Business Alliance Code of Conduct v8

4.4 Scope and application

These policy commitments apply across:

- All company operations and business units
- Employees, contractors and management

Policies related to suppliers are described in an agreed code of conduct identified in a contractual clause.

Policies related to business partners are described in the contract and referred to the last version of Responsible Business Alliance Code of Conduct.

4.5 Implementation and oversight

We have a clear responsibility and ownership model for policy implementation and compliance supervision:

- Oversight of policy implementation lies with the ESG council
- Day-to-day enforcement is coordinated by the ESG development committee
- All employees receive regular training on relevant policies, and compliance is monitored via internal audits and supplier assessments

4.6 Communication and review

Policies are reviewed annually to ensure alignment with evolving legal, societal and stakeholder expectations.

Updates are communicated internally via leadership briefings, e-learning and team workshops.

We disclose our policy commitments and progress in our annual Sustainability Report.

5. ALE ESG transformation roadmap

Our ESG transformation roadmap is designed to navigate a world in constant evolution, where rising risks demand forward-thinking and collective engagement. Anticipating change and ensuring that both internal and external stakeholders are actively involved is central to our approach and reach our sustainability target.

To embed our eight strategic ESG pillars, we conducted a structured analysis of impacts, risks and opportunities across each of our business activities. This process raises awareness among activity owners and highlights the cost of inaction. We then assessed and prioritized these factors, identifying transition plans to address the most material issues.

Our IRO identification is based on both generic risks and opportunities associated with our industry, and specific insights drawn from Life Cycle Assessments (LCAs) of our products, as well as alignment with the TCFD framework. This dual approach ensures that our analysis captures both sector-wide expectations and product-level realities.

These transition plans are integrated into our operational roadmap, ensuring ESG becomes a core lever of business strategy. Oversight and alignment are ensured at the highest level through our ESG Council, which monitors progress and supports continuous improvement.

ALE IROs are further detailed in their respective chapters in this report.

This embedded structural ESG transformation will drive the delivery of all ESG operations towards our targets.

6. Environmental sustainability

6.1 Environmental impact, risks and opportunities

As part of our ESG execution framework, we have conducted a thorough assessment to identify the most significant **impacts, risks and opportunities (IROs)** related to the environment across each of our business activities.

This approach ensures that our sustainability strategy is not only top-down but also embedded into operational realities. By mapping the environmental IROs specific to each activity, we enable more targeted and relevant actions, aligned with the actual impact and potential of each part of our organization.

In doing so, we actively involve the teams responsible for these operations in the reflection process—reinforcing ownership, awareness and the integration of sustainability into day-to-day decision-making.

This IRO-based assessment is a cornerstone of our ESG roadmap, supporting both accountability and cross-functional engagement toward our environmental objectives.

The most impactful IROs related to the environment are shared in Annex 3a.

6.2 Environmental transition plans

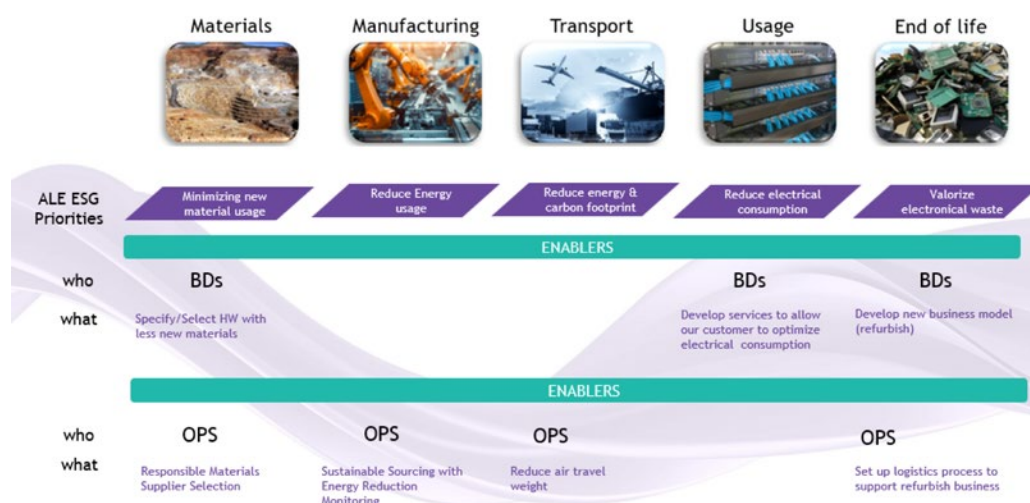
Our environmental transition plan is grounded in a clear analysis of our most significant greenhouse gas (GHG) emission categories and aligned with our science-based targets validated by the SBTi. It focuses on high-impact levers such as increasing the use of recycled materials, developing hardware-free communication services (cloud, software and digital platforms), engaging suppliers in low-carbon transformation and improving the energy efficiency of our operations and products. We are also

expanding circular economy initiatives and creating new services to help our customers monitor and optimize the energy consumption of our solutions—actively involving them in reducing the footprint across the entire value chain (Scope 3).

Beyond climate-related risks, we are rolling out LCAs across our entire product portfolio to better understand and address other environmental impacts. For Scope 1 and 2 emissions, we have implemented a corporate car policy to reduce fleet-related emissions, launched internal initiatives to cut energy use in our labs and continue to deploy ISO 14001 certification across all sites with laboratory activities.

In 2024, ALE launched LCAs across the product portfolio and expanded circular economy initiatives. A detailed transition plan addressing all IROs will be released in 2025 for the below environmental matters.

ALE products environmental impacts, risks and mitigations



6.2.1 ISO 14001: Environmental Management System

Purpose

As part of our commitment to continuous environmental improvement, we have initiated the deployment of a structured Environmental Management System (EMS) aligned with ISO 14001 standards. This system provides a clear framework to monitor, manage, and reduce the environmental footprint of our operations and value chain.

Based on IRO collection at the activities level, we were able to identify ALE environmental aspects by filtering IROs belonging to environmental domains and having a negative impact.

We have organized our environmental management efforts around two main areas:

- **Office & site operations** – Improving energy efficiency, reducing water and waste consumption and promoting responsible day-to-day practices across our offices and laboratories
- **Product lifecycle & design** – Addressing environmental performance through eco-design principles, use of recycled materials, energy-efficient product architecture and end-of-life considerations (LCA, recyclability, circular economy)

A key pillar of our EMS is our supplier engagement strategy. We require all our manufacturing partners to be ISO 14001 certified, ensuring that environmental performance is managed consistently throughout our supply chain.

Our objective is to achieve ISO 14001 certification for our own operations by early 2026, confirming our commitment to operational excellence and environmental responsibility across the organization. The project is led by the Quality team with the full support of the ALE ESG development committee.

What is in scope

- All products sold by the ALE group
- Only the location part of ALE International (France) and ALE USA (USA)
- Only suppliers shipping hardware equipment

What is excluded

- Selling units other than ALE International and ALE USA

Methodology

To identify the ALE environmental aspects, we leveraged IRO collected at activities level. Those having the most environmental negative impact became the ALE environmental aspects.

These environmental aspects have been reviewed and validated by ESG development committee to ensure relevance and completeness.

Results

Domain	Environmental Aspects
ALE Globally	GHG emission
Office	Office electricity consumption
Office	Office waste
Product	Plastic in packaging
Product	Virgin materials
Product	Product electricity consumption
Product	Product end of life (waste)

In-scope water consumption in ALE offices is limited to office use. It is not considered as an environmental aspect due to its low impact. Nevertheless, we monitor its consumption to ensure no deviation.

Other initiatives related to environmental impacts (but not related to our selected environmental aspects) have already been launched:

- Set end-to-end LCA for all our products (project starting May 2025 and planned to end June 2026)
- Develop circular economy (some products have already been proposed on circular economy business models, representing 1M€ in 2024, not including after sales activities)
- Increase reparability of our products
- Develop services to optimize our customer electrical consumption

Going forward

Our target is to be certified ISO14001 in March 2026. An internal audit will be released in September 2025 and a pilot external audit will be released in Q4 2025.

Transformation plans are already engaged for all environment aspects. The target is to set up KPIs on these aspects and monitor progress.

6.2.2 GHG emission reporting

Purpose

Climate Change Mitigation is one of ALE's eight ESG domains. Therefore, we have decided to engage in an SBTi program, confirming that our decarbonization pathway is aligned with the goals of the Paris Agreement.

In 2024, reduction targets have been validated by SBTi:

- Near term target: To reduce our GHG emissions (Scope 1, 2 and 3) by 42% in 2030, compared to 2022 baseline
- Net zero: To be net zero in 2050

We report our GHG emission and evolution on a yearly basis:

- In this report (ALE ESG yearly activity report)
- On our public website: <https://www.al-enterprise.com/-/media/assets/internet/documents/ghg-estimation-global-emissions-report-en.pdf>
- On the CDP (Carbon Disclosure Project) platform: <https://www.cdp.net/en>

What is in scope

- Emissions of all ALE Group (Including ALE International and ALE USA)
- All categories relevant to ALE

What is excluded

The following categories from GHG Protocol Scope 3, have been excluded as they are not relevant for ALE:

- Upstream and downstream leased assets
- Processing of sold products
- Franchises
- Investments

Methodology

Our GHG emissions reporting follows the GHG Protocol standards and uses 2022 as the baseline year. Emissions are tracked across Scopes 1, 2 and 3 and are categorized in accordance with internationally recognized reporting frameworks.

Our methodology was validated against ISO-14064-3 2019 Standards by Goodbody ClearStream (<https://clearstreamolutions.ie>) in 2023. Below is their verification statement.

Verification Statement

GHG Inventory, prepared for Alcatel-Lucent Enterprise

Period Covered by GHG emissions verification

1st January 2022 to 31st December 2022

GHG Verification Standard used to conduct the verification

ISO – 14064-3:2019 Specifications with Guidance for the Validation and Verification of Greenhouse Gas Statements

Level of Assurance

The opinion expressed in this verification statement has been formed on the basis of a limited level of assurance and at a materiality of the professional judgement of the verifier.

Opinion

In Goodbody Clearstream's opinion nothing has come to the attention of the verifier that would cause us to believe that the Scope 1, Scope 2 and Scope 3 CO₂e emissions disclosed in the statement and summarised in Table 1 are not materially correct.

GHG emission accuracy is based on data quality. ALE collects physical data rather than monetary data as much as possible, despite the fact that most of the data is managed by external stakeholders (Scope 3). We believe that GHG emissions data is more accurate if the collection method is based on physical estimation rather monetary actual value.

A detailed methodology of our GHG emissions computation is available by request.

Reporting of emission method category

ALE carbon intensity (tCO₂e / M€)

Actual (monetary)	Estimate (physical)	Actual (physical)
22%	53%	25%

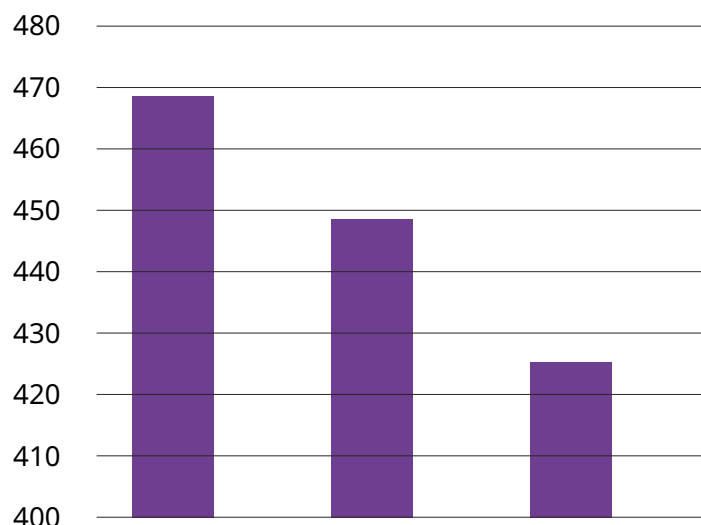
Results

Details of 2024 ALE GHG emissions are reported in Annex 4 following GRI Standards.

GHG Emission Scope	2024 GHG in tCO ₂	Variation compared to 2022
Scope1	902	-3%
Scope2	4 260	-13%
Scope3	191 908	-20%
Total	197 069	-20%

Our GHG emissions reduction is in line to reach SBTi targets.

Our carbon intensity (tCO₂e / M€) has decreased by 9% compared to the 2022 baseline.



Going forward

We have launched several initiatives on our GHG reduction path:

- Set up a corporate car policy to reduce our GHG emissions Scope 1
- Increase awareness and develop services on our own network equipment to optimize electricity consumption to reduce our GHG emissions Scope 2
- Increase recycled material in our products
- Accelerate the circular economy
- Collaborate with our suppliers on upstream reduction

As Scope 3 (downstream) represents 70% of our emissions, it is critical for us to engage our business partners and customers. Our objectives are:

- To demonstrate our engagement in GHG emissions reduction through assessment, webinars and the ESG external advisory board around key industries. ALE is already engaged in several workshops with the Smart Building Alliance including some dedicated to sustainability in Smart Buildings
- To demonstrate our solutions can reduce their GHG emissions beyond our own scope (using IoT and network solutions)
- To collaborate with them to reduce our end-to-end value chain (through circular economy)

6.2.3 Energy

Purpose

Energy management is part of ALE's Climate Change Mitigation ESG domain. It contributes to reduce our Scope 2 emissions, but it also contributes to our sustainability. Reducing our energy dependency will reduce the related risks.

What is in scope

Our energy reporting is aligned with GRI 302: Energy and covers all significant energy consumption sources across our operations. We monitor both direct energy use (Scope 1) and indirect energy use (Scope 2), with data consolidated annually at the ALE group level. Period of report start from the 1st of January 2024 until the 31st of December 2024.

For Scope 1, energy used for our corporate fleet for ALE group is in scope.

For Scope 2, ALE's reported energy consumption includes all main offices and laboratories. GHG emissions for the remaining offices are based on an estimation from footprint, number of employees and region.

The total electrical consumption reported represents more than 96% of the total consumption of the ALE Group's offices.

What is excluded

Coworking and virtual offices are not yet included due to data unavailability, but are estimated at less than 4% of the total energy consumed by ALE Group offices.

Energy consumed in ALE upstream value chain and downstream value chain is excluded.

ALE does not own or manage the offices, manufacturing and testing sites and energy used by our vehicle fleet. Nevertheless, we ensure that all our manufacturing suppliers monitor energy consumption and reduce its negative impact on the environment through ISO 14001 certification (mandatory to be an ALE supplier), ESG quarterly review for suppliers having the most impact and ESG yearly activity review.

Methodology

For our corporate vehicle energy consumption:

Fleet management is outsourced to different service providers depending on the country. We identify the vehicle models and the contracted distance. Most of the time, the emissions factor of the concerned vehicle is on the contract, but if not, emission factors are retrieved from <https://www.largus.fr/>.

For our office energy consumption:

Our office contracts are not standardized because we lease, we have co-working offices and we have a remote workforce (virtual). While the energy consumption reporting for our leased offices is exhaustive, it is difficult to gather quality data for the energy consumed in co-working and virtual spaces.

Due to this variety in sites, we group different sites per topology.

- Group A: Main sites (all with labs and all located in France and US). This group is used for our ISO 14001 certification and EcoVadis assessment.
- Group B: Smaller ALE sites in lease model

- Group C: Smaller ALE sites in co-working or virtual models
- Group A and Group B are part of the reporting scope. No reporting is done for sites outside ALE.

Method of data collection is determined as follows:

- For electricity: Based on invoices or, where they were not available, we have estimated our consumption based on square meter and number of people per country
- For fuel (only one location with low consumption): Estimated based on the quantity of fuel purchased and the average interval between fuel invoices
- For HVAC gas: Based on meter reading after each quarterly maintenance operation

Results

For Scope 1:

Type of Vehicle	# of contracts	2022 GHG (in tCO2e)	2024 GHG (in tCO2e)	GHG / Contracts
Diesel	194	828	606	3,123
Gasoline	47	42	186	3,947
Hybrid	77	28	110	1,435
Electrical	19	0	0	0
Total	337	898	902	2,676

Since our baseline, energy consumed is flat. We noticed a move from diesel to gasoline and a small increase in hybrid.

For Scope 2:

Energy	# of sites	2024 Value	Evolution compared to 2022
Electricity	24	12725 MW	Decrease of 13%
Fuel	1	120 L	Not significant
HVAC gas	3	0 L	Not significant

Detailed reporting following the GRI Standard can be found in Annex 5.

ALE purchases renewable energy from its electrical provider for six sites (three under ALE International in France, one in Italy, one in Austria and one in Belgium).

The following table represents the percentage of renewable energy per site:

Scope	% of renewable energy consumption
ALE International	100%
Sites integrated in EMS	33%
All ALE Group	27.5%

Guarantees of origin for 2024 issued to SAS ALE by ALE International's electricity provider is available on demand. These confirm that 100% of the energy supplied comes from renewable sources.

Since 2020, ALE has made significant moves to reduce the energy use of its main locations:

- Illkirch (2021) and California (2023) moved to smaller smart buildings
- Colombes (2024) and Brest (2025) rationalized occupied spaces

Going forward

For Scope 1, the evolution is not in line with our SBTi near term target. We will set up a corporate car policy in 2025.

For Scope 2, to reduce further energy consumption (particularly electricity) of our labs, we are engaging our design team to develop services to optimize consumption of our network.

6.2.4 Water

Purpose

While water is not identified as a material topic for ALE operations, ALE collected water consumption data for our main sites (Group A – see methodology) to identify deviation.

What is in scope

Our water consumption reporting is aligned with GRI 303: Water and Effluents 2018 and covers all significant water consumption sources across our offices. Data is consolidated annually at the ALE group level. The reporting period goes from January 1, 2024 until December 31, 2024.

ALE does not own any offices. Different types of contracts exist, such as leasing, co-working and virtual. For co-working and virtual, no water reporting is possible. There is no significant interaction with water bodies or intensive processes requiring water.

ALE activities are office activities to support R&D, Sales & Marketing, Operations, Finance and IT. Therefore, water consumption is limited to domestic purposes such as restrooms, kitchen areas and building maintenance. Due to the variety of ALE sites, we have grouped sites per topology:

- Group A: Main sites (all with labs and all located in France and US). This group is used for our ISO 14001 certification and EcoVadis Assessment
- Group B: Smaller ALE sites in lease model
- Group C: Smaller ALE sites in co-working or virtual models

ALE's reported water consumption covers Group A, representing approximately 65% of our workforce.

What is excluded

- ALE offices for Groups B and C (due to the complexity of reporting)
- Water used by our suppliers

Methodology

Our annual water withdrawal volumes are based on invoiced consumptions. The unit of reporting is m³.

Results

Site Name	Site Group	Water Source	Annual Withdrawal	Unit	Monitoring Method
France - Illkirch	A	Municipal network	1095	m ³	Invoice
France – Brest	A	Municipal network	698	m ³	Invoice
France - Colombes	A	Municipal network	644	m ³	Invoice
USA - Newbury	A	Municipal network	3300	m ³	Invoice

Our total water consumed is 5737 m³. All water discharge is domestic in nature and connected to public sewage systems. There are no industrial effluents or direct discharges into natural environments. Water consumption is equivalent to total withdrawal, as there is no reuse or evaporation of significance. Water is not currently reused or recycled onsite.

Going forward

As water consumption is not considered material only consumption monitoring is planned.

6.2.5 Waste

Purpose

Waste generated from ALE's operations is quite limited as we don't operate any manufacturing factories. Nevertheless, as part of the setup of our environmental management system, we have decided to report on waste to increase visibility of waste management.

What is in scope

- Waste generated at our four main sites (three in France and one in US). These sites have labs and represent around 65% of the total number of employees.

What is excluded

- Waste generated outside our organization
- Waste generated by offices outside France and US

Methodology

Waste generated across our operations is managed primarily through third-party service providers. Even in Colombes, waste except Waste Electrical and Electronic Equipment (WEEE), which is subject to regulatory requirements and traceability obligations, is managed by the city. As such, our current visibility into the final treatment methods of the various waste streams remains limited.

The outsourced nature of our waste management with different providers limits our ability to report detailed waste treatment data (e.g., material recovery, landfill, incineration) in full alignment with GRI 306 categories.

Results

Consolidated waste per category is displayed in the following table:

Waste type	Weight	Units
GBW	22.72	tons
Glass	0.47	tons
Mixed	2.70	tons
Paper / Carton	7.85	tons
WEEE	2.13	tons

A detailed report of waste per site is available in Annex 6.

Going forward

As part of our ongoing efforts to implement a certified EMS, we are actively working to improve traceability and transparency across all waste flows. This includes engaging with our waste management partners, improving internal monitoring processes and strengthening data collection protocols.

These actions are aimed at progressively enhancing the quality and reliability of our waste-related reporting and supporting our broader sustainability objectives.

7. Social responsibility

7.1 Social impact, risks and opportunities

Our people are at the heart of our long-term resilience and success. As part of our ESG risk and opportunity mapping, we have identified several key social drivers that represent both opportunities for value creation and levers for risk mitigation. These include fostering a diverse and inclusive culture, investing in continuous learning and career development, enhancing employee well-being and recognizing performance.

Our strong social foundation is deeply rooted in our company culture, inherited from our legacy as part of a large industrial group. This heritage continues to shape our approach to inclusion, employee engagement and long-term talent development—all of which are integral to our operational model and values.

In addition to internal engagement, our external social footprint is also a priority. Through community outreach and social responsibility programs—particularly in education, inclusion and local partnerships—we aim to reinforce our social license to operate and contribute positively to the ecosystems in which we work.

Each of these areas is assessed for its potential impact on our organizational resilience, talent retention, innovation capacity and brand reputation.

The key impacts, risks and opportunities (IROs) related to Social are shared in Annex 3b.

7.2 Our employees

7.2.1 Employment

Purpose

We strive to be an attractive and responsible employer, offering fair working conditions, meaningful jobs and long-term employment perspectives. These efforts support employee well-being and our long-term organizational performance.

Employment is part of one of the eight focused ALE ESG domains: Labor Practices & Employee Development.

What is in scope

- All ALE Group entities except SIPWISE

What is excluded

- SIPWISE (around 1%)

Methodology

Data is collected from all HR global teams.

Results

Indicator	Unit / Format	2024 Value	Comment / Source
Total number of employees	Headcount	1683	Excl. SIPWISE
New hires during the year	Headcount	84	Only employees, excl. students, trainees, apprentices
Employee turnover rate	%	5.9	Including retirement (3.3% without)
Internal mobility rate	%	0.95	
Full-time employees	Headcount	1635	FTE 1
Part-time employees	Headcount	48	FTE <1
Permanent contracts (CDI)	Headcount	1678	
Fixed-term contracts (CDD)	Headcount	5	
Temporary / agency workers	Headcount	66	Dec 24: 69 CTR Jan 25: 66 CTR Feb 25: 63 CTR • Average
Trainees / interns	Headcount	84	Students, trainees, apprentices & VIE

Key retention programs in place	Text	SMI, EBS, SIP Internal mobility Talent management Succession planning Game Changers Oxford Women's Leadership Development Program Together Go Green CARS certification LinkedIn Learning Local training plans ALE Mentoring Program
---------------------------------	------	--

Going forward

The turnover rate is in line with our 2030 target set out in the Labor Practices & Employee Development pillar.

7.2.2 Labor relationship

Purpose

We maintain constructive and transparent labor relations, promoting social dialog at all levels of the organization. Our approach is based on trust and cooperation with employee representatives and compliance with local laws.

Employment is part of one of the eight focused ALE ESG domains: Labor Practices & Employee Development.

What is in scope

The table in the “Methodology” section below reports the labor relationship indicators for ALE International (France), representing 50% of all ALE Group employees.

What is excluded

- All countries outside of France

Note that other countries do have good labor practices in place, but these are excluded from the ESG report in 2024.

Methodology

The data comes from social reporting by ALE International.

Results

Indicator	Unit / Format	2024 Value	Comment / Source
Presence of employee representatives	Yes / No	Yes 29 holders 8 union delegates	Results of last professional elections: 22/11/2022
Number of collective agreements signed	Number	4 collective agreements signed with effect in 2024	
Coverage rate by collective agreements	%	100%	

Indicator	Unit / Format	2024 Value	Comment / Source
Employee consultation mechanisms in place	Text / Description	7 information consultations of the economic and social committee Employees are consulted via their union representatives in accordance with legal requirements (information and consultation mechanism of the economic and social committee)	H&S report, Papripact, Social report, Gender report, Economic and financial situation, social policy, Strategic orientations
Significant changes in working conditions during the year	Text / Description	Reorganization of one of our departments Implementation of a new business travel and expense tool Implementation of a car-sharing application for one of our sites Reorganization of premises, occupying one building instead of two for one of our sites	
Average early notice period before implementing changes	Days	30 to 60 days	
Number of social dialog meetings held	Number	12 meetings / year for 2 of our sites and 10 meetings / year for 1 of our sites 9 additional meetings / year at a central level	
Grievance mechanisms available to employees	Text / Description	Employees have access to grievance mechanisms via their union representatives according to legal requirements Also, at ALE employees can report any breach of our code of conduct via internal channel (Speak-up) or external channel (Verifi)	

7.2.3 Training and education

Purpose

We invest in continuous learning and skill development for all employees to support professional growth and strategic transformation.

Training and Education is part of one of the eight focused ALE ESG domains: Labor Practices & Employee Development”.

Training is closely aligned with our business priorities and individual development goals.

What is in scope

The table in the “Methodology” section below reports the training indicators for ALE International (France), representing 50% of all ALE Group employees.

What is excluded

- All other legal units of ALE Group outside of ALE International

Methodology

The data presented here is part of French training regulations to be provided to unions every year. The data is collected using a training department tool.

For Knowledge Hub and LinkedIn training, the data comes from these platforms.

Results

Indicator	Unit / Format	2024 Value	Comment / Source
Average training hours per employee	Hours	16.7	2024 consolidated report/Online and classroom training
Total number of training hours delivered	Hours	14 331	2024 consolidated report/Online and classroom training
Percentage of employees trained	%	100%	The calculation is based on the average annual headcount
Training hours by job category (e.g.	white/blue collar	Hours / Category a) 13,985 hours for the "cadre" – non hourly category b) 346 hours for the "administrative & technician" - hourly category	No factory => no blue collar
Main training themes / programs	Text	<ul style="list-style-type: none"> • Technology • Application • Business Culture 	
Indicator	Unit / Format	2024 Value	Comment / Source
ESG and DEI-related training sessions	Text	937 sessions for 549 hours	
Upskilling / reskilling initiatives	Text	99,64% upskilling 0,36% reskilling	
Leadership development programs	Text	96 leadership training sessions + Specific ALE programs: <ul style="list-style-type: none"> • Game Changers • Oxford Women leadership • People Manager learning path + Re-certification People Manager 	
Training satisfaction rate (if applicable)	%	3,1 / 4	

ALE also set up a Knowledge Hub accessible to employees of the entire ALE Group. The table below displays its related indicators.

Indicator	Unit / Format	2024 Value	Comment / Source
Average training hours per employee	Hours	1h/employee	
Total number of training hours delivered	Hours	8 632	
Percentage of employees trained	%	31,79%	
Training hours by job category (e.g., white/blue collar)	Hours/Category	NA	

Indicator	Unit / Format	2024 Value	Comment / Source
Main training themes / programs	Text	OmniAccess Stellar WLAN - Self Practice on Ekahau OmniSwitch LAN - Remote LAB Rental Rainbow Edge - Rainbow Edge Scale Installation	
ESG and DEI-related training sessions	Text	130 sessions ESG - Together - Internal mentoring programme Intégrité, Éthique des Affaires et Conformité des Exportations Operating Model Overview and Principles Trouble To Resolve (T2R) Business Partner Lifecycle (BPL) Opportunity Lifecycle (OLC) Purchase To Pay (P2P) Business Lifecycle (BLC)	
Upskilling / reskilling initiatives	Text	100% Upskilling	
Leadership development programs	Text	NA	
Training satisfaction rate (if applicable)	%	NA	

7.3 Diversity, Equity & Inclusion

Purpose

We are committed to fostering a diverse, equitable and inclusive workplace where every employee feels valued and respected.

Diversity is not only a value, but a driver of innovation and engagement. We support the employee initiative “Together for All”, which promotes diversity in ALE.



In September 2024, the TogetHer group was relaunched with the name, “Together For All”, as it is a program open to everyone in the company: all genders, without any discrimination. We believe that together, we can drive beautiful change.

Together For All envisions a workplace where everyone feels valued, respected and empowered to bring their authentic selves to work. We strive to cultivate an inclusive environment that celebrates diverse perspectives, promotes equitable opportunities and fosters a sense of belonging for all employees.

A new structure has been established within the group to ensure we focus on the DEI dimensions that matter at ALE: Gender Equality, Early Careers, Late Careers and Disabilities.

A new event has been introduced in ALE: ALE Equality Day, first held on April 24, 2025. This initiative celebrates equality among all genders, races and backgrounds, raises awareness of DEI and promotes equality and inclusion.



DEI is part of one of the eight focused ALE ESG domains: Diversity, Equity & Inclusion.

What is in scope

- All legal units of ALE Group

What is excluded

- No exclusions

Methodology

Data comes from the HR employee management tool.

Results

Indicator	Unit / Format	2024 Value	Comment / Source
Gender diversity - % of women in total work-force	%	20.62%	
Gender diversity - % of women in management positions	%	15.6% / 18.09%	Reflected in C, D, E grades / People Managers
Pay equity initiatives implemented	Text	According to our financial capabilities, each year we address identified pay gap with SMI program that ensures equity for all	Our ambition is to ensure all employees are provided with equal opportunities for growth and success. It is ALE's intention to proactively address remuneration gaps in equality pay based on financial capabilities.
Gender pay gap	%	3.3	
DEI training sessions conducted	Text	LinkedIn Learning International Women's Day 2024 event Impostor Syndrome Workshop	

Indicator	Unit / Format	2024 Value	Comment / Source
Employee resource groups / networks in place	Text	Together for All	<p>Our program has deep roots in our history. Until 2024, TogetHer was the global rebirth of the Women's Network Together, an employee-led program launched in Illkirch, France, in 2013, as well as the StrongHer program that Alcatel-Lucent championed (and that is now part of Nokia).</p> <p>The program, now called "Together for All" is no longer "for women / by women" but for anyone looking to enrich their perspectives through diversity. Many studies show that diversity and inclusion positively impact a company's brand, culture, innovation capacity and financial results.</p>
Inclusion & equity targets set	Text	Ensure all employees feel valued and respected and are provided with equal opportunities for growth and success	DEI index to be computed to measure progress. (Targets: +30%). This index will be a composite of relevant KPI part of CSRD report.
Progress toward DEI targets	Text	Working progress	We are working on IRO, we created a plan to Accelerate Gender Equity and we make every effort to recruit and promote women in leadership positions
Policies or charters related to DEI	Text	DEI policy Code of Conduct Recruiting policy	

7.4 Human rights

7.4.1 UN Guiding Principles on Business and Human Rights

We are committed to respecting and promoting human rights throughout our operations and value chain. Our approach is guided by international frameworks such as the UN Guiding Principles on Business and Human Rights.

In 2024, no human rights cases were reported through whistleblowing channels.

We will continue to assess and mitigate human rights risks, especially among suppliers and in high-risk geographies.

7.4.2 Local communities

The ALE Impact Mission is to positively impact our global community by delivering communications and infrastructure solutions to help those in need. We strengthen our impact through focused global projects that allow us to deploy our core strengths and contribute to a humanitarian cause. Projects are reviewed and selected using these criteria:

- Supports a non-governmental organization (NGO, non-profit, voluntary citizens' group)
- Matches our vertical and/or cloud focus
- Requires communications and/or networks to meet their own NGO's objectives

- Vetted by the ALE legal team

In 2024, we continued our support for two corporate charities, Mercy Ships and Qhubeka, which assist in improving the health, education and well-being of the local communities they support.

Our commitment to corporate social responsibility and sustainability is evident in our actions and initiatives to benefit local communities. We actively engage with local communities, contributing to their development and well-being through targeted actions. We recognize the importance of social responsibility in business and strive to integrate it into our operations. We aim to create positive impacts beyond financial gains by embracing business and social responsibility. At ALE, we are committed to sustainability and social responsibility, recognizing the interconnectedness of social and environmental responsibility.

ALE has been investing in local communities to plant trees since 2022.

In 2024, we continued this investment, planting trees and enabling the collecting and recycling of plastics. ALE's community investments enabled the collection and recycling of 4,024t of plastics and the planting of 30,000 trees, providing 881 workdays in India, Africa and South America. We aim to further increase our positive social and environmental impact through ongoing and new initiatives.

Most Saturdays, the local Indian team provides Community support on a regular schedule as part of our India Corporate Social Responsibility (CSR) initiatives. ALE has been committed to supporting India's education drive for national development.

In 2024, the world continued to have humanitarian crises. One such event in Valencia, Spain, with tragic human losses and severe material damage caused by another storm. This phenomenon severely affected several autonomous communities in Spain, including the Valencian Community, Castilla-La Mancha, Andalusia and Aragon. Local ALE employees conveyed their condolences to the victims' families and reaffirmed the company's commitment to support all those affected by this devastating meteorological phenomenon. ALE put in place measures to prioritize any incident affecting this region, focusing on essential services for the Generalitat Valenciana. The company extended its solidarity to all the people and organizations working tirelessly to assist the victims and restore normality in the affected areas, reiterating its commitment to support the Spanish communities in those difficult times.

8. Corporate governance

8.1 Governance impact, risks and opportunities

Governance is the foundation of a responsible and resilient organization. As part of our ESG risk and opportunity assessment, we have identified key governance-related areas that may affect ALE's ability to maintain stakeholder trust, meet regulatory expectations and operate effectively in evolving markets.

These governance levers are essential not only for mitigating risks but also for reinforcing ALE's position as a trusted and forward-looking company.

Key impacts, risks and opportunities (IROs) related to Environment are shared in Annex 3c.

8.2 Data privacy and security

Purpose

As a technology company, it is no surprise that data privacy and cybersecurity emerged as one of the most material topics in our ESG materiality assessment (DMA). This holds true for both dimensions of double materiality: the impact we have on external stakeholders (inside-out) and the risks we face from external pressures (outside-in).

Our ambition is clear: establish digital trust with our customers, suppliers and partners by ensuring the highest standards of data protection and information security. To support this ambition, we have set a challenging yet essential target: by 2030, we aim to reach 100% compliance with applicable data privacy and cybersecurity regulations and certifications.

Achieving this goal is increasingly demanding as regulatory frameworks evolve and tighten across geographies and sectors. Despite this, we remain fully committed and made important progress in 2024 by renewing several key security certifications for our digital platforms:

- ISO/IEC 27001:2022 for our cloud-based solutions
- HDS (Hébergeur de Données de Santé) certification for Rainbow UCaaS & CPaaS
- ENS (Esquema Nacional de Seguridad) for Rainbow in Spain
- HIPAA (Health Insurance Portability and Accountability Act) for healthcare data protection

In addition, we have launched a cross-functional program to prepare for compliance with the EU NIS2 Directive, which came into force in October 2024. This directive will significantly broaden the scope of cybersecurity obligations for essential and important entities in Europe. Our ongoing work includes enhanced risk assessments, updated incident response procedures and stronger third-party cybersecurity controls—ensuring that we meet future obligations and strengthen our operational resilience.

These efforts reflect our proactive approach to risk management and regulatory alignment, reinforcing our credibility as a secure and responsible technology partner.

The following template provides a structured overview of our data privacy and cybersecurity management practices, in line with GRI 418: Customer Privacy. It summarizes our policies, certifications, compliance targets, incident reporting and ongoing improvement actions to ensure digital trust and regulatory alignment

What is in scope

- All ALE solutions and all ALE Group legal units

Results

The following data has been compiled at the company level.

Topic	Data Privacy & Cybersecurity
Policy in Place (Yes/No)	Yes
Description of Policy or Measures	Comprehensive cybersecurity and data privacy policy covering cloud services, data protection, access man-agement, incidents & vulnerabilities management. In-cludes internal procedures aligned with ISO 27001, GDPR, NIS2, LPM, EO 14028, ENS, HIPAA
Compliance Target (e.g., 100% by 2030)	100% compliance by 2030
Certification(s) Obtained	ISO/IEC 27001, HDS (Rainbow UCaaS & CPaaS), ENS (Spain), HIPAA (health sector)
Training Provided (Yes/No)	Yes
Training Participation Rate (%)	97
Reported Incidents (if any)	0
Regulatory Action Taken (if any)	None
Corrective Actions	N/A
Ongoing Improvements	Cross-functional program to ensure compliance with NIS2 Directive; regular security audits; supplier security reviews

Topic	Data Privacy & Cybersecurity
External Verification (Yes/No)	Yes
Comments/Notes	ISO 27001 certification renewed in 2024; NIS 2 compliance ongoing

At the solution level, by obtaining CSPN certification for Rainbow™ EDGE, ALE has demonstrated its strong commitment to data privacy and security, showing that the Rainbow solution adheres to the strict requirements of the French local authority, ANSSI.

The Rainbow solution also ensures data privacy through sovereignty which provides our clients with assurances of the security and confidentiality of their data. This is demonstrated by the presence of our solutions in several datacenters in the world, where we respect all local regulations.

ALE has a strong cybersecurity culture. We follow the recommendations of several local authorities in many countries (NIST, BSI, ANSSI, ENS), demonstrating our strong commitment to protecting our clients' data.

Verticals are a strong focus for ALE. By obtaining and reaffirming our compliance with the Health Insurance Portability and Accountability Act (HIPAA) in the US and “Hébergeur de données de santé” (HDS) in France, our clients in the healthcare sector can be reassured about the security of their electronic Protected Health Information (ePHI).

Our Rainbow classroom solution for the U.S. educational sector has also obtained compliance with the Family Educational Rights and Privacy Act (FERPA)

The Rainbow EDGE solution provides customers with full control of their data. Security and confidentiality are the same as in our Rainbow UCaaS solution but are completely protected from the Internet.

In 2025, ALE will release the Rainbow Guardian service to allow any organization to fast recover their communication services after a cyber-attack or incident damaging their business continuity.

8.3 Sustainable business strategy and risk management

8.3.1 Sustainable business strategy

Our sustainable business strategy is grounded in a thorough assessment of environmental and social IROs across our business activities. This materiality-based approach ensures that sustainability is not treated in isolation, but as a core element of our long-term value creation model. The major IRO are published in the different materiality chapter of this report.

The strategy is deployed through a structured transition plan, which includes:

- Resource allocation aligned with priority ESG topics
- Integration into the strategic roadmaps of each business function and operational unit
- A commitment to deliver measurable progress toward our sustainability objectives.

The entire process is supervised by our governance bodies, ensuring cross-functional coordination, leadership accountability and alignment with our corporate purpose and stakeholder expectations.

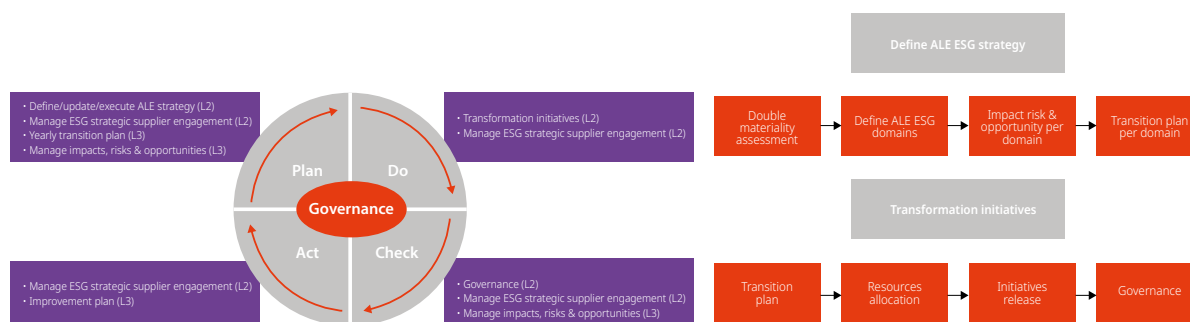
This integrated approach allows us to embed sustainability into decision-making and day-to-day operations, enabling resilient growth while contributing positively to people and the planet.

8.3.2 Sustainability integration in our operating model

Since ESG is part of our strategy, related transformation must be integrated in all our activities to finally be part of our culture. Managing IRO at the activity level, increases activities owners' awareness of what is at stake with ESG and how to improve our sustainability. It also brings the desire to change. To support this transformation, sustainability is also integrated in our operating model through a dedicated transversal ESG process and also in key core processes.

ESG is integrated in our operating model handbook. A detailed ESG policy can be downloaded from our public web site (<https://www.al-enterprise.com/-/media/assets/internet/documents/esg-policy-2025-brochure-en.pdf>)

ALE ESG Processes



8.4 Business ethics, compliance and transparency

Purpose

ALE maintains the highest levels of business ethics, personal integrity and compliance across its business. The ALE Compliance program and its Code of Conduct are the cornerstone of this commitment, defining respectively the company's corporate policies against corruption and fraud and ALE's expectations of consistent and strict ethical behavior for employees, non-employee contract workers and business partners.

ALE has a zero-tolerance policy regarding unethical behavior or violation of integrity. ALE may accordingly take disciplinary action against employees who fail to comply with the ALE Code of Conduct and may terminate contractual relationship with business partners not complying with the rules of fair trading and applicable anti-corruption laws.

The ALE Code of Conduct sets ethical, integrity and compliance principles to which employees must adhere. The ALE Compliance program consists of the Anti-Fraud Policy and the Anti-Corruption & Hospitality Policy, explaining the reasoning and importance for ALE to fight corruption and fraud and the types of prohibited actions or behavior as potential signs of corruption or fraud.

The ALE Compliance Program also includes a risk mapping, a third-party due diligence procedure with regards to onboarding business partners (suppliers, distributors and resellers), key internal controls and processes within ALE's operating model and regular education/training sessions for ALE personnel. A whistleblowing tool is also made available worldwide to employees for reporting breaches of the ALE Compliance Program or Code of Conduct or other unethical behavior and violations of integrity.

A dedicated team managing Ethics Compliance and Internal Control is responsible for designing, promoting and maintaining the ALE Compliance Program and Code of Conduct and investigating any reported breach.

What is in scope

- All processes and organizations in ALE Group

What is excluded

- No exclusions

Methodology

For the Ethics & Business Conduct disclosures under GRI standards, our methodology focuses on consolidating and analyzing key data points that reflect our governance and ethical practices. Specifically, we:

1. **Collect reported cases:** We gather all relevant data from our reporting tools (e.g., whistleblowing platform, conflict-of-interest declarations) to monitor and assess the number, nature and resolution of ethics-related cases.
2. **Track training completion:** We monitor participation and completion rates for ethics and compliance trainings to evaluate awareness and alignment with our Code of Conduct.
3. **Review by the Ethics Committee:** Our Ethics Committee regularly reviews reported cases and trends, ensuring proper follow-up actions and aligning our processes with best practices and regulatory expectations.

This structured approach allows us to provide transparent and reliable disclosures under GRI, demonstrating our commitment to integrity and ethical business conduct.

Results

A detailed report of Business Ethics, Compliance & Transparency performance is available in Annex 7.

In 2024, ALE established an Ethics Committee to monitor compliance and whistleblowing cases. This committee is represented by the Legal, HR & Compliance team for ALE International & ALUSA legal units. This committee meets every quarter.

We plan to release updated policies and training modules based on committee recommendations.

In order to face the exploding number of regulation (especially environmental and securities regulations), an ALE Compliance Committee was set up in Q3 2024. It encompasses all regulation domains ALE must comply with: Legal, Human Resources, Finance, Export Control, Product, Procurement, Environmental & Security. This committee meets every quarter, and minutes are shared with the ESG council and the Board of Directors of ALE Group. Its main mission is to share regulatory evolution, status and risk mitigations.

A new tool to report any conflict of interest has been released. 100% of ALE staff has declared its status with regards to conflict of interest. This process is now yearly.

Awareness training for ALE employees has been released. 100% of ALE staff have undergone the global awareness training on business ethics and integrity and passed the assessment quiz.

Going forward

We aim to maintain our current high standards of ethics and business conduct while continuously strengthening our practices. Our priorities include ensuring ongoing monitoring of reported cases, sustaining high completion rates for ethics and compliance trainings and maintaining the regular oversight of our Ethics Committee. We will continue to ensure that our reporting remains transparent and aligned with GRI standards, reflecting our commitment to integrity and responsible business practices.

8.5 Sustainable procurement

As part of our commitment to responsible sourcing, we have strengthened our sustainable procurement practices by integrating ESG considerations into our supplier selection and management processes.

All new suppliers are now subject to ESG screening criteria, and an ESG annex has been added to our standard contracts, requiring formal signature and adherence. This annex outlines our expectations in areas such as ethical conduct, environmental performance, human rights and labor practices.

For our most impactful suppliers—particularly those involved in the delivery of hardware components—we have implemented a dedicated monitoring program, which includes:

- A structured ESG assessment at onboarding or renewal
- Regular engagement to explain our ESG priorities and align expectations
- Progress reviews held two to four times per year, depending on the criticality and maturity of the supplier relationship

These efforts contribute directly to our Scope 3 emissions strategy, supply chain resilience and our broader ambition to align sustainability objectives throughout our value chain.

In these following reports, the percentage of suppliers indicated is weighted by the weight of hardware shipped during the reporting year.

GRI 308: Supplier Environmental Assessment	
Supplier Environmental Assessment Management	ALE has launched a dedicated ESG supplier engagement program to its suppliers most impacting suppliers. In this program, ESG performance is done every year.
% of new suppliers screened for environmental criteria	100% of new suppliers
% of new suppliers screened using environmental criteria	100% of new suppliers
Negative environmental impacts in the supply chain and actions taken	Delivery of telecommunication solutions based on electronic devices to our customer has known negative impacts. We select suppliers who address these impacts and are engaged to limit them. We are also engaged to reduce non virgin materials, develop a circular economy and improve energy efficiency. The starting point is to measure our negative impact through end-to-end LCA.
Number of suppliers assessed for environmental impacts	In 2024, total of suppliers having been assessed represent 78% of total hardware delivered.
Number of suppliers identified with actual and potential negative environmental impacts	100% of the suppliers shipping hardware have negative environmental impact
% of suppliers with improvement plans, identified with actual, potential, negative environmental impacts	78% of our suppliers. 74% of our suppliers have identified and shared IRO + transition plan in their activity report.
% of suppliers whose contract was terminated, identified as having actual, potential, negative environmental impacts	0%

White Paper

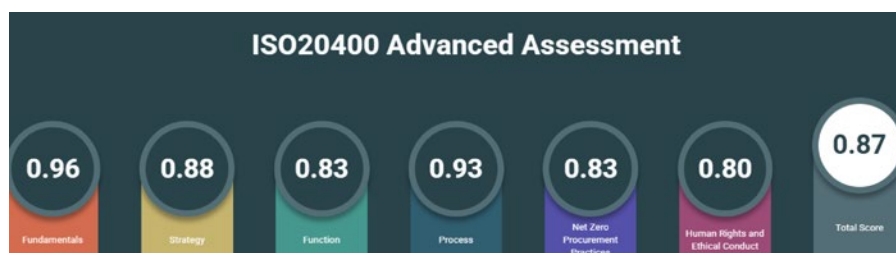
GRI 414 Supplier Social Assessment

Supplier Social Assessment Management	ALE has launched a dedicated ESG supplier engagement program for its most impacting suppliers. In this program, ESG performance is done every year.
% of new suppliers screened for social criteria	100% of new suppliers
% of new suppliers screened using social criteria	100% of new suppliers
Negative social impacts in the supply chain and actions taken	Negative social impact risk on ALE value chain is limited as ALE selects suppliers demonstrating social engagement standards. ALE supply chain policy is based on expectations shared in the contract and QBR with no tolerance for deviation.
Number of suppliers assessed for social impacts	In 2024, total of suppliers having been assessed represent 78% of total hardware delivered.
Number of suppliers identified with actual and potential negative social impacts	No negative social impacts have been identified
Actual and potential negative social impacts identified in the supply chain	No negative social impacts have been identified
% of suppliers with improvement plans, identified with actual, potential, negative social impacts	0%

The following table presents the main ESG criteria assessment and the weighted percentage of suppliers meeting the assessment criteria.

ESG QBR with ALE	78%
ESG Yearly activity released	97%
UNGC	61%
ISO 14001	98%
EcoVadis medals	44%
SBTI targets validated	84%
CDP above Level C	41%
ISO 45001	98%
IRO released	89%
Transition plan released	89%

To support and continuously improve our procurement framework, we collaborate with our external ESG consultant, Future Planet, who helps us benchmark our practices against the international ISO 20400 Standard on sustainable procurement. Scores are in %.



9. ESG targets, KPI and 2024 progress

ESG domain	KPI	2030 Target	2024 Target	Comment / Source
Climate Change Mitigation	GHG emissions reduction compared to 2022	-42%	-25%	Reduction in line with targets
Product Environmental Adaptation	Product having a digital product passport	80%	0%	KPI will be reworked next year once LCA will be released for all our products (based on Product Environmental Footprint index)
Human Rights	Commitment to protect human rights and partner with companies expressing the same commitment	100%	100%	Target already achieved. Monitoring set up to keep target.
Labor Practices & Employee Development	Employee turnover rate (resignations)	<6%	3.3 %	Target already achieved. Monitoring set up to keep target.
Diversity, Equity and Inclusion	DEI index progress	+30%	TBD(1)	Due to CSRD delay, DEI index to be reworked
Business Ethics, Transparency and Compliance	Compliance rate	100%	100%	Due to increase of regulations, regulations watch to be industrialized
Data Privacy and Security	Compliance rate with data privacy and security regulation	100%	100%	KPI to be reworked to focus more of non-conformity & area of concerned of related certifications
Strategy and Risk Management	Sustainable business	+30%	TBD(2)	Due to CSRD delay, sustainable business KPI to be reworked

- (1) As part of our commitment to compliance with the Corporate Sustainability Reporting Directive (CSRD) and to ensure the highest quality and comparability of our disclosures, the calculation and publication of our Diversity, Equity and Inclusion (DEI) composite index is currently under refinement. We are actively adapting our data collection processes and aligning our methodology with the latest CSRD guidelines, expected to be finalized by Q4 2025. Until then, we continue to monitor individual DEI-related KPIs and conduct targeted programs to advance equity and inclusion across ALE. This phased approach enables us to deliver robust and transparent reporting in the next reporting cycle
- (2) As the EU taxonomy implementation is still in progress and difficult to apply in our distribution-based business model, we are working to define an internal KPI aligned with our climate and ESG transition plan. It must enable us to track our shift toward a more sustainable business model, based on tangible, forward-looking internal criteria, even when the final use of our products is not directly observable.

10. Conclusion

Over the past year, we have made measurable progress across key ESG areas.

We are proud of having set up ESG framework in our organization based on IROs at the activity level. This enables us to make ESG more concrete in our operations and integrate it in our principles

On the environmental front:

- Our GHG emissions targets have been validated by SBTi
- We reduced our operational emissions by 20%, in line with the SBTi path
- We reinforced our collaboration with our suppliers following ISO 20400 best practices
- We advanced our circularity initiatives (first revenue generated)
- We engaged to set up an EMS and target certification early 2026
- We identified ALE primary environmental aspects through IRO collection
- We provided our product carbon footprint to our customers
- We engaged in end-to-end LCA for all our products to be available early 2026

On the social front:

- We formalized our commitment to human rights through new supplier screening processes
- We maintained our low turnover rate, validating our labor practices and care for our employee development
- We transformed our Together program to Together for All to enlarge inclusion to all minorities

On the governance front:

- We extended our governance model by adding an ethics committee and a compliance committee
- We maintained our low turnover rate, validating our labor practices and care for our employee development
- We ensured that all activities are screened against sustainable IROs and launched the related mitigations plans

While these achievements mark important steps forward, we are aware of the remaining challenges.

In the next year, we aim to:

- Deepen our product impact assessments through LCA
- Continue improving our sustainable data quality
- Co-develop ESG initiatives with key partners to accelerate our value chain transformation

Annex

1. GRI Content Index Table

ALE has reported content for 2024 activities in reference to GRI Standards (GRI 1: Foundations 2021).

GRI Standards	Disclosure Item	Chapter number	Chapter	Page
GRI2 - Organization and its reporting practices	2-1: Organizational details	3	About ALE	
	2-2: Entities included in the organization's sustainability reporting	2	About this report	
	2-3: Reporting period, frequency and contact point	2	About this report	
	2-4: Restatements of information	2	About this report	
	2-5: External assurance	2	About this report	
GRI2 - Activities and workers	2-6: Activities, value chain and other business relationships	3	About ALE	
	2-7: Employees	3	About ALE	
	2-8: Workers who are not employees	4.4	About ALE	
GRI2 - Governance	2-12: Role of the Highest Governance Body in Overseeing the Management of Impacts	4.4	ALE ESG Governance	
GRI2 - Strategy, policies and practices	2-22: Statement on sustainable development strategy	4.6	ALE ESG Strategy	
	2-23: Policy commitments	4.5	ALE ESG Policies	
	2-24: Embedding policy commitments	4.5	ALE ESG Policies	
	2-25: Processes to remediate negative impacts	4.7 & 6.1 & 7.1 & 8.1	ALE ESG Transformation framework Environmental Impacts, Risks & Opportunities Social Impacts, Risks & Opportunities Governance Impacts, Risks & Opportunities	
	2-26: Mechanisms for seeking advice and raising concerns	8.2	Business ethics, Compliance and Transparency	
	2-27: Compliance with laws and regulations	8.2	Business ethics, Compliance and Transparency	
	2-29: Approach to stakeholder engagement	4.3	ALE's Stakeholder Engagement Approach	
GRI2 - Stakeholder engagement	2-30: Collective bargaining agreements	7.4	Labor Relationship	

GRI Standards	Disclosure Item	Chapter number	Chapter	Page
GRI 3 – Material Topics	3-1: Process to determine material topics	5.1	Process to determine material topics	
			List of identified Material sub-Topics	
	3-2: List of material topics	5.2		
	3-3: Management of material topics	4.7	ALE ESG Transformation Roadmap	
GRI 302 – Energy		6.4	Energy	
GRI 303 – Water and effluents		6.5	Water	
GRI 305 – Emissions	305-1: Scope 1	6.3	GHG Emission Reporting	
	305-2: Scope 2	6.3	GHG Emission Reporting	
	305-3: Scope 3	6.3	GHG Emission Reporting	
	305-5: Emissions reduction	6.3	GHG Emission Reporting	
GRI 306 – Waste		6.6	Waste	
GRI 308 - Supplier Environmental Assessment	308-1: New suppliers that were screened using environmental criteria	8.4.3	Sustainable Procurement	
	308-2: Negative environmental impacts in the supply chain and actions taken	8.4.3	Sustainable Procurement	
GRI 401 – Employment	401-1: New employee hires and employee turnover	7.3	Employment	
	401-2: Benefits provided to full-time employees	7.3	Employment	
	401-3: Parental leave	7.3	Employment	
GRI 402 – Labor/ Management Relations	402-1: Minimum notice periods regarding operational changes	7.4	Labor Relationship	
	404-2: Program for upgrading employee skills	7.5	Training and Education	
	404-3: Percentage of employee receiving regular	7.5	Training and Education	
GRI 405 – Diversity and Equal Opportunity	405-1: Diversity of governance bodies and employee	7.6	Diversity, Equity and Inclusion	
	405-2: Ratio of basic salary and remuneration of women to men	7.6	Diversity, Equity and Inclusion	

GRI 406 – Non-Discrimination	406-1: Incidents of discrimination and corrective actions taken	7.6	Diversity, Equity and Inclusion
GRI 412 – Human Rights Assessment	412-1: Operations that have been subject to human rights reviews or impact assessments	7.2	Human Rights
	412-2: Employee training on human rights policies or procedures	7.2	Human Rights
	412-3: Significant investment agreements and contracts that include human rights clauses or were subject to human rights screening	7.2	Human Rights
GRI 413 – Local Communities	413-1: Operations with local community engagement, impact assessments, and development programs	7.7	Local Communities
GRI 414: Supplier Social Assessment	414-1: New suppliers that were screened using environmental criteria	8.4.3	Sustainable Procurement
	414-2: Negative social impacts in the supply chain and actions taken	8.4.3	Sustainable Procurement
GRI 418 - Customer Privacy	418-1: Substantiated complaints concerning breaches of customer privacy and losses of customer data	8.3	Data Privacy and Security

2. Glossary

CDP	Carbon Disclosure Program
CSRD	Corporate Sustainability Reporting Directive
DEI	Diversity, Equity & Inclusion
DMA	Double Materiality Assessment
EMS	Environmental Management System
EMT	Executive Management Team
ESG	Environmental, Social & Governance
GHG	Green House Gas
GRI	Global Reporting Initiative
ILO	International Labor Organization
IRO	Impacts, Risks & Opportunities
ISO	International Organization of Standardization
LCA	Life Cycle Assessment
NACE	Nomenclature of Economic Activities
NIS2	Network and Information Security Directive 2
SBTi	Science Based Target initiative
UNGC	United Nations Global Compact

3. Impacts, risks and opportunities

a. Environmental impact, risks and opportunities

Title	Major Impacts, Risks and Opportunities	Type	TCFD Category	Time
Environmental product compliance	Environmental regulations are rapidly expanding across the globe, becoming stricter, more complex, and increasingly enforced. Governments and regulatory bodies are pushing for higher standards to address climate change, reduce pollution, and ensure sustainable production practices. This shift has major implications for manufacturers, suppliers and product designers worldwide. If we are not compliant, the market will be affected for ALE. This is already effective, and impact is huge.	Risk	Policy & Legal Risks	1-5 year
Design of product - energy consumption	Develop services to help our customers to optimize electrical consumption of our solutions. As the market shifts towards a low-carbon economy due to climate change, ALE anticipates new business opportunities from expanding or developing climate friendly products and services. This could potentially increase revenue for ALE.	Opportunity	Energy Source	1-5 year
Design of product - optimization of product and packaging	Specify/select hardware with materials having the least risks and having the less environmental impacts, increase recycled content ratio in concerned materials, specify/select hardware easy to repair, reuse, refurbish	Opportunity	Resource Efficiency	1-5 year
Embed circular economy principles and e waste management	Extend buyback program to include more products and thus improve our circular economy have refurbishment in mind when phasing out products (such as basestations)	Opportunity	Products & Services	1 year
Climate mitigation	ALE has set ambitious target to reduce GHG according to SBTi. Not reaching this target will impact our credibility and reputation.	Risk	Reputational Risks	1-5 year
Building a resilient and transparent supply chain	Building a resilient, transparent supply base mitigates ESG risks and enhances supply chain stability. By prioritizing suppliers with strong ESG practices and fostering transparency, ALE can reduce disruptions, align with stakeholder expectations and gain a competitive advantage.	Opportunity	Resilience	1-5 year

b. Social impacts, risks and opportunities

Title	Risk	Type	Category	Time
DEI	Promote an inclusive and diverse culture to attract and retain talent, enhance creativity and innovation, and ensure fair treatment for all employees. Create a workplace where everyone feels valued and included. Implement policies that promote equal opportunities, conducting diversity training and fostering an inclusive culture.	Positive Impact	Resilience	1 year
Skill development, career path and learning	Foster continuous growth and development to enhance employee capabilities and career progression, by providing opportunities for employees to develop new skills, advance their careers, and achieve their professional goals. The goal is to empower employees to reach their full potential, improve job satisfaction, and retain top talent by supporting their career aspirations.	Positive Impact	Resilience	1 year

Title	Major Impacts, Risks and Opportunities	Type	TCFD Category	Time
Recognition and rewards	This culture enhances productivity and improves employee morale, leading to better customer service, higher customer satisfaction, and ultimately, improved financial performance for the business.	Opportunity	Resilience	1 year
Employee well-being, work-life balance	Encourage a healthy work-life balance to improve employee satisfaction. Offer flexible working hours, homeworking options, encourage employees to take their vacations and to disconnect. Implement well-being pro-grams to support mental and physical health of employees, to increase employee satisfaction, reduce stress and improve overall productivity.	Positive Im-pact	Resilience	1-5 year
Community engagement & social responsibility	Local programs (e.g., STEM education near factories, local charity work, DEI programs, SME partnerships) strengthen social license to operate and improve public image and increase tender success rates. ALE has already done some solid work in certain regions.	Opportunity	Markets	1-5 year

c. Governance impacts, risks and opportunities

Title	Risk	Type	Category	Time
Cybersecurity & data governance	Data breaches or privacy violations could erode customer trust, trigger fines, and disqualify ALE from high-value contracts (e.g., healthcare/government sectors). Insider threats, third-party vulnerabilities and sophisticated cyberattacks necessitate a robust cybersecurity strategy.	Risk	Market Risks	1 year
Regulatory compliance and ESG reporting	Non-compliance with evolving ESG regulations may result in legal penalties, exclusion from tenders and reputational damage. Incomplete or outdated reporting may disqualify ALE from public contracts and erode stakeholder trust.	Risk	Reputational Risks	1-5 year
Ethics and transparency	Maintain high standards of ethics and transparency in all business practices to build trust with stakeholder and prevent unethical behavior. Implement code of conduct, conduct regular audits, ensure open communication. Publish annual sustainability report, have clear policies on conflict of interest.	Positive Impact	Markets	1 year
Affordability & budgeting for ESG investments	Additional costs arise from ESG investments, including compliance tools, supplier changes, and sustainability initiatives. ESG-related costs should be embedded into financial planning to avoid unaccounted-for expenses. (from transition plans)	Risk	Policy & Legal Risks	1 year

4. GRI report: GHG emissions

Scope	Category	Emission Source	Calculation Method	Emission Factor Source	GHG Type	Emissions (tCO2e)	Base Year	Current to Base Year (%)	Reduction Target (by 2030)	Actions Taken	Comments
1	Mobile combustion fuels and vehicle	Leasing vehicle fleet	Actual (Physical)	[R1]	CO2	902	2022	0%	-42%	Corporate car policy to be set up	
1	Fugitive emissions	Air conditioner gas leakage	Actual (Physical)	[R3]	CO2	4260	2022	-13%	-42%	Awareness campaign and working group per labs	
2	Office Electricity	Purchased electricity (location based)	Actual (Physical)	[R3]	CO2	4260	2022	-13%	-42%	Awareness campaign and working group per labs	
2	Office Electricity	Purchased electricity (market based)	Actual (Physical)	[R2] + [R10]	CO2	7229	2022	-1%	-42%		
3	Purchase Goods and Services	CBD Material & Manufacturing	Estimated (Physical)	[R5]	CO2	16035	2022	-34%	-42%	Move to Cloud business	
3	Purchase Goods and Services	NBD Material & Manufacturing	Estimated (Physical)	[R5]	CO2	10565	2022	-21%	42%	Engage supplier & move to eco design	
3	Purchase Goods and Services	Cloud Services for CCBD deliveries	Actual (Monetary)	[R6]	CO2	271	2022	%	42%	Engage with suppliers	
3	Capital Goods	IT	Actual (Monetary)	[R6] (334118)	CO2	41	2022	-6%	42%		
3	Capital Goods	Lab equipment	Actual (Monetary)	[R6] (541380)	CO2	207	2022	-48%	42%		
3	Capital Goods	Offices Furniture	Actual (Monetary)	[R6] (337214)	CO2	57	2022	-64%	-42%		
3	Other Fuel & Energy	T&D Losses	Estimated (Physical)	[R7]	CO2	227	2022	-10%	-42%		
3	Other Fuel & Energy	Upstream emissions of purchased electricity	Estimated (Physical)	[R7]	CO2	594	2022	-10%	-42%		
3	Other Fuel & Energy	Upstream emissions of purchased fuels	Estimated (Physical)	[R7]	CO2	253	2022	12%	-42%		
3	Upstream Transportation & Distribution	Upstream Transportation	Estimated (Physical)	[R4]	CO2	20809	2022	-18%	-42%		
3	Upstream Transportation & Distribution	WTT	Estimated (Physical)	[R4]	CO2	2081	2022	-18%	-42%		
3	Waste generated in operations	Office & Lab waste	Actual (Physical)	[R4]	CO2	15	2022	-57%	-42%		
3	Waste generated in operations	Scraping	Estimated (Physical)	[R4]	CO2	22	2022	116%	-42%		
3	Business Travel	Business Travel	Actual (Physical)	[R8]	CO2	2534	2022	100%	-42%		Travel freezes due to covid in 2022

Scope	Category	Emission Source	Calculation Method	Emission Factor Source	GHG Type	Emissions (tCO2e)	Base Year	Current to Base Year (%)	Reduction Target (by 2030)	Actions Taken	Comments
3	Business Travel	Personal car	Estimated (Physical)	[R8]	CO2	72	2022	-20%	-42%		
3	Business Travel	WTT	Estimated (Physical)	[R8]	CO2	205	2022	20%	-42%		
3	Employee commuting	Employee commuting	Estimated (Physical)	[R4]	CO2	819	2022	-2%	-42%		
3	Employee commuting	WTT	Estimated (Physical)	[R4]	CO2	356	2022	-1%	-42%		
3	Downstream Transportation & Distribution	Downstream Transport	Estimated (Physical)	[R4]	CO2	18369	2022	-17%	-42%		
3	Downstream Transportation & Distribution	WTT	Estimated (Physical)	[R4]	CO2	1837	2022	-17%	-42%		
3	Use of product sold	Communication Solution Usage	Actual (Physical)	[R3]	CO2	25191	2022	-16%	-42%	Engage with supplier	
3	Use of product sold	Network Solution Usage	Actual (Physical)	[R3]	CO2	69052	2022	-25%	-42%	Engage with supplier & develop services based on IA to optimize energy needed	
3	Use of product sold	T&D Losses	Estimated (Physical)	[R3]	CO2	5274	2022	-17%	-42%		
3	Use of product sold	WTW	Estimated (Physical)	[R3]	CO2	13789	2022	-17%	-42%		
3	End-of-life Treatment of Sold Product	All products	Estimated (Physical)	[R4]	CO2	2299	2022	-27%	-42%		

[R1]: Vehicle constructor; consolidated in IFRS16 - <https://www.lacentrale.fr/>

[R2]: Directly provided by ENGIE ENERGIE SERVICES (Green Electricity purchased)

[R3]: Ourworldindata - Carbon intensity of electricity generation <https://ourworldindata.org/grapher/carbon-intensity-electricity> (May 12, 2025, Update)

[R4]: Base Carbone ADEME - <https://data.ademe.fr/datasets/base-carboner> (V23.4)

[R5]: EcoInvent v3.8

[R6]: NAICS - Supply Chain Emission Factors (without margin) - <https://catalog.data.gov/dataset/supply-chain-greenhouse-gas-emission-factors-v1-3-by-naics-6> (V1.3)

[R7]: Greenhouse gas reporting: conversion factor (gov.uk) - <https://www.gov.uk/government/publications/greenhouse-gas-reporting-conversion-factors-2024>

[R8]: DEFRA Standard

[R10]: AIB - <https://www.aib-net.org/facts/european-residual-mix/2024> (Version 1.0, 2025-05-30)

5. GRI Report: Energy

Site Name	Site Group	Reporting Method	Energy type	Energy usage	Energy consumed	Consumption type	Renewable	Consumption (GJ)	Consumption (kWh)	Consumption (L)
France - Illkirch	A	Invoice	Electricity	Own used	Undefined	Unknown	Yes	3097	860297	
France - Illkirch	A	Meter Reading	HVAC Gaz	Own used	Undefined	Unknown	Yes	0	0	
France - Brest	A	Invoice	Electricity	Own used	Undefined	Unknown	Yes	7590	2108380	
France - Brest	A	Estimation	Fuel	Own used	Undefined	Unknown	Yes			120
France - Brest	A	Meter Reading	HVAC Gaz	Own used	Undefined	Unknown	Yes	0	0	
France - Colombes	A	Meter Reading	Electricity	Own used	Undefined	Unknown	Yes	1152	319954	
France - Colombes	A	Meter Reading	HVAC Gaz	Own used	Undefined	Unknown	Yes	0	0	
USA - Newbury	A	Invoice	Electricity	Own used	Undefined	Unknown	No	761	211377	
USA Downers	A	Invoice	Electricity	Own used	Undefined	Unknown	No	24027	6674327	
Argentina	B	Invoice	Electricity	Own used	Undefined	Unknown	No	252	69982	
Australia	B	Invoice	Electricity	Own used	Undefined	Unknown	No	125	34843	
Austria	B	Invoice	Electricity	Own used	Undefined	Unknown	Yes	548	152270	
Belgium	B	Invoice	Electricity	Own used	Undefined	Unknown	Yes	84	23233	
Germany	B	Invoice	Electricity	Own used	Undefined	Unknown	No	299	82960	
India - Bangalore	B	Invoice	Electricity	Own used	Undefined	Unknown	No	3788	1052263	
India - Chennai	B	Invoice	Electricity	Own used	Undefined	Unknown	No	1660	461234	
Indonesia	B	Invoice	Electricity	Own used	Undefined	Unknown	No	31	8629	
Israel	B	Estimation	Electricity	Own used	Undefined	Unknown	No	80	22088	
Italy	B	Invoice	Electricity	Own used	Undefined	Unknown	Yes	116	32232	
Netherlands	B	Estimation	Electricity	Own used	Undefined	Unknown	No	14	3903	
Philippines	B	Estimation	Electricity	Own used	Undefined	Unknown	No	47	13148	
Russia	B	Invoice	Electricity	Own used	Undefined	Unknown	No	889	246820	
Singapore	B	Invoice	Electricity	Own used	Undefined	Unknown	No	444	123412	
South Africa	B	Estimation	Electricity	Own used	Undefined	Unknown	No	131	36287	
South Korea	B	Estimation	Electricity	Own used	Undefined	Unknown	No	142	39443	
Spain	B	Invoice	Electricity	Own used	Undefined	Unknown	No	249	69134	
Switzerland	B	Estimation	Electricity	Own used	Undefined	Unknown	No	53	14818	
UAE	B	Invoice	Electricity	Own used	Undefined	Unknown	No	231	64239	

6. GRI Report: Waste

Site	Country	Waste Type	Disposal Method	Quantity (tons)	Hazardous	Generated On-site or Off-site	Recovery Method	Consumption (GJ)	Consumption (kWh)	Consumption (L)
Brest	France	GBW	Unknown	5,72	No	On site	Unknown	Unknown	Unknown	Real
Brest	France	PAPER / CARTON	Recycled	2,55	No	On site	Unknown	Unknown	Unknown	Real
Brest	France	GLASS	Recycled	0,18	No	On site	Unknown	Unknown	Unknown	Real
Brest	France	WEEE	Recycled	0,00	Yes	On site	Recycling	Unknown	Unknown	Real
Colombes	France	GBW	Unknown	5,12	No	On site	Unknown	Unknown	Unknown	Estimate
Colombes	France	PAPER / CARTON	Recycled	1,77	No	On site	Unknown	Unknown	Unknown	Estimate
Colombes	France	GLASS	Recycled	0,11	No	On site	Unknown	Unknown	Unknown	Estimate
Colombes	France	WEEE	Recycled	0,77	Yes	On site	Recycling	Unknown	Unknown	Real
Colombes	France	MIXED	Recycled	2,10	No	On site	Unknown	Unknown	Unknown	Estimate
Illkirch	France	GBW	Unknown	7,22	No	On site	Unknown	Unknown	Unknown	Real
Illkirch	France	PAPER / CARTON	Recycled	1,92	No	On site	Unknown	Unknown	Unknown	Real
Illkirch	France	GLASS	Recycled	0,09	No	On site	Unknown	Unknown	Unknown	Real
Illkirch	France	WEEE	Recycled	1,00	Yes	On site	Recycling	Unknown	Unknown	Real
Illkirch	France	MIXED	Recycled	0,44	No	On site	Unknown	Unknown	Unknown	Real
Thousand Oaks	USA	GBW	Unknown	4,66	No	On site	Unknown	Unknown	Unknown	Estimate
Thousand Oaks	USA	PAPER / CARTON	Recycled	1,61	No	On site	Unknown	Unknown	Unknown	Estimate
Thousand Oaks	USA	GLASS	Recycled	0,10	No	On site	Unknown	Unknown	Unknown	Estimate
Thousand Oaks	USA	WEEE	Recycled	0,36	Yes	On site	Unknown	Unknown	Unknown	Estimate
Thousand Oaks	USA	MIXED	Recycled	0,16	No	On site	Unknown	Unknown	Unknown	Estimate

7. GRI Report: Ethics

Indicator	Unit / Format	2024 Value	Comment / Source
205-1: Operations assessed for risks related to corruption	Number / Description	100%	Enterprise-wide corruption risk mapping conducted annually
205-2: Communication and training about anti-corruption policies and procedures	Number of employees trained / Description of training	100% of employees trained	Mandatory annual training on anti-corruption for all employees
205-3: Confirmed incidents of corruption and actions taken	Number of incidents / Ac-tions taken	0 incidents	No confirmed cases in 2024
206-1: Legal actions for anti-competitive behavior, anti-trust and monopoly practices	Number of cases / Legal outcome	0 cases	No legal action reported
307-1: Non-compliance with environmental laws and regulations	Number of non-compliances / Fines or sanctions	0	No fines or sanctions received
419-1: Non-compliance with laws and regulations in the social and economic area	Number of non-compliances / Legal or regulatory impact	1 non-compliance with local tax regulation	One case reported in LATAM and resolved without sanction
Code of Conduct implemented (yes/no)	Yes / No	Yes	Available on company intranet and distributed at onboarding
Employees trained on Code of Conduct (%)	% of employees	95%	Monitored via LMS
Anti-corruption & bribery policy in place (yes/no)	Yes / No	Yes	Aligned with local and international regulations
Conflict of Interest policy in place (yes/no)	Yes / No	Yes	Employees must declare interests yearly; 100% completion in 2024
Number of declared conflicts of interest	Number of cases	2 declared cases	Both cases handled through HR compliance team
Existence of whistleblowing mechanism (yes/no)	Yes / No	Yes	Accessible 24/7 with anonymous reporting option
Data privacy & confidentiality policy (yes/no)	Yes / No	Yes	Covers customer and employee data
418-1: Substantiated complaints concerning breaches of customer privacy and losses of customer data	Number of complaints / Number of incidents	0 complaints	Monitored via DPO and security team reporting