



ALE ESG Policy



Introduction and Mission

Our vision is to deliver the customized technology experiences our customers need. Our mission is to make everything connect by delivering digital age networking, communications and cloud solutions with services tailored for your business success. In the Cloud. On-Premises. Hybrid.

ALE is committed to developing technology solutions that work for our customers, connecting people, machines, things, and processes while creating a more sustainable future for all.

This ESG Policy aims to articulate our commitment to integrating Environmental, Social, and Governance (ESG) principles into our core business strategies and operations. By establishing and adhering to this ESG Policy, we seek to fulfill our corporate responsibilities and contribute meaningfully to a sustainable and equitable future. Our dedication to ESG principles ensures we create lasting value for our stakeholders while positively impacting the environment and society.

ALE has conducted a comprehensive Double Materiality Assessment (DMA), identifying eight key ESG domains to focus on:

- Climate change mitigation
- Environmental Product adaptation
- Human Rights
- Labor Practices and Employee Development
- Diversity, Equity, and Inclusion
- Business Ethics, Transparency and Compliance
- Data Privacy and Security
- Strategy and Risk Management

For each domain, we have set ambitious objectives to achieve by 2030, forming our ESG strategy's foundation. Our ESG Policy is derived from this strategic framework.



1. Environmental Criteria (E)

We are committed to limiting the global warming to 1.5°C. Following recommendations from Science Based Target initiatives SBTi, our near-term target (2030) is to reduce by 42% our scope 1, 2 & 3 emissions compared to the 2022 baseline and become net zero by 2050.

We are also committed to efficiently using natural resources and energy to minimize our environmental impact and promote sustainability.

Our plans include:

- **Life Cycle Assessment (LCA):** Conduct comprehensive LCAs to understand and mitigate the environmental impacts of our products from development to end-of-life. These LCA focus on all dimensions of the Product Environmental Footprint defined in the EU Green Deal.
- **Sustainable Sourcing:** Collaborate with our suppliers to increase the proportion of recycled materials used in our products, ensure responsible sourcing, and reduce reliance on virgin resources. Engage our manufacturer to reduce their emission related to materials purchase and manufacturing through a customized engagement program with quarterly action plan reviews. Ensure all our manufacturing suppliers are ISO14001 certified.
- **Design Optimization:** Work closely with our design teams to optimize packaging, making devices more sustainable, easier to repair, and enhancing the longevity of our products to extend their lifecycle.
- **Move our solutions to the Cloud when it makes sense:** Replace our Hardware Solutions with Cloud Communications solutions.
- **Optimize electrical consumption of our devices:** Increase the energy efficiency of our devices and develop services to dynamically turn off our devices when possible.
- **Circular Economy Models:** Develop and implement new business models based on the principles of the circular economy, focusing on recycling, reusing, and reducing waste to create sustainable value chains. Engage with Partners and End Customers.

We are committed to following all legislative chemical product restrictions to preserve our environment.



2. Social Criteria (S)

We believe that our people and communities are at the heart of our success. Our commitment to social responsibility is reflected in the following principles:

Working Conditions

We ensure a safe, healthy, and fair work environment for all employees. Our policies and practices are designed to promote occupational safety and well-being, creating a workplace where every individual can thrive.

Well-being and Job Satisfaction

We strive to create an environment where employees can thrive. We offer flexible working hours, remote work options, and wellness support programs. By supporting employees' well-being, we improve engagement levels and enable them to balance their professional and personal responsibilities.

Diversity and Inclusion

We foster a culture that embraces diversity, equity, and inclusion. By valuing diverse perspectives and backgrounds, we empower our teams to innovate and grow while ensuring that every voice is heard and respected.

Skills Development

We invest in our employees' futures by offering comprehensive training and professional development opportunities. Our commitment to continuous learning helps our team members expand their skills, adapt to change, and reach their full potential.

Respect for Human Rights

We uphold the highest standards in respecting and promoting fundamental human rights across all our operations. This commitment is integral to our practices, ensuring that our business complies with international norms and sets an example of ethical conduct.

Contribution to Local Communities

We believe in the importance of supporting local communities. We participate in social initiatives to improve the quality of life for those around us. Whether through volunteering, partnerships with local organizations, or donations, we are committed to positively influencing society.

We are committed to upholding these social responsibility standards, not only within our own operations but also across our entire value chain.



3. Governance Criteria (G)

We are firmly dedicated to conducting our business with integrity and corporate responsibility. Our commitment is expressed through the following key principles:

Uncompromising Business Ethics

Business Ethics & Integrity are documented in dedicated policy and the ALE Code of Conduct.

Several preventive controls ensure the respect of the policy:

- Screening process before engaging in a business transaction.
- Yearly ALE staff training and assessment
- Collection & management of arising situations for fraud or conflict of interest.

And some detective controls:

- Through our Speak Up program, internal and external whistleblowing channels are in place.
- Regular internal audit.

Ethics committee reporting on business ethics & integrity activity to management.

Strict Regulatory Compliance

We are fully committed to complying with all applicable laws, regulations, and industry standards. We have established a Compliance Committee covering the following areas: legal, human resources, finance, export control, product purchasing, environment, and security. This committee monitors evolving regulations and coordinates the appropriate responses to ensure our company remains fully compliant.

Enhanced Data Privacy

We are committed to protecting the privacy and security of data across our operations. We ensure compliance with GDPR and other relevant data protection regulations, implementing robust security measures to safeguard customer, employee, and partner information. Our approach includes:

- Yearly training of ALE staff,
- Manage personal data registers as data controller and data processor,

- Manage contractual materials with third parties in relevant situations,
- Manage incident register,
- Manage data breach readiness and occurrences,
- Manage personal data protection constraints in the internal product development cycle (checklists),
- Manage compliance to processes: data subject requests or claims processes,
- Regulatory intelligence over the matter.

Enhanced Data Security

We are committed to strengthening the security of our information systems and products by implementing a robust and consistent security framework. Our approach is based on a continuous improvement mindset, ensuring resilience against evolving cyber threats.

We actively identify, assess, and mitigate risks to safeguard our digital assets, data, and customer trust. Compliance with industry standards and cybersecurity certifications is a key priority, enabling us to meet regulatory and market requirements while fostering a secure digital ecosystem.

Embedding cybersecurity into our operations and products, we enhance our resilience, risk management, and trustworthiness in an increasingly digital world.

Integrated Risk and Opportunity Analysis

The systematic evaluation of risks and opportunities is central to our transformation towards a more sustainable business model. We continuously monitor and analyze internal and external factors, enabling us to identify emerging challenges and capitalize on new opportunities. This forward-looking approach ensures that our strategic decisions support long-term resilience and sustainable success.



4. Monitoring and Reporting

Objectives KPIs are published in the yearly ESG activity report on the ALE public website.

Our internal governance body reviews ESG KPI and related action plans quarterly.

5. Stakeholder Engagement

Internal Stakeholders

ESG is identified as Strategic for us and is part of the Yearly Objectives of all divisions.

The ESG governance body ensures the engagement of internal stakeholders and the progress of the ESG transformation. It encompasses:

- The ESG Council includes the top management for KPI review and key ESG decisions. Meeting every Quarter
- The ESG development committee includes one or two representatives for each organization to share progress and set up working sessions on dedicated topics. Meeting every Month

In addition to governance bodies, ESG activities are part of ALE values days, and updates are shared regularly through All Hands and internal communications.

A group of volunteers, “Go Green,” propose global and local activities to integrate ESG into our culture. The Sponsor of this group is EVP Global Operations.

A group of volunteers, “Together For All,” propose global and local activities to integrate ESG into our culture. The Sponsor of this group is EVP HR-RE.

ESG processes, policies, guidelines, and templates are integrated into our Operating model.

External Stakeholders

Suppliers are engaged in ESG transformation through Sustainable procurement activities and ESG Quarterly reviews.

Business Partners are engaged in ESG transformation through an on-demand assessment based on their ESG supplier engagement program. We promote extensive collaborations with business partners and customers around our common Impact Risks and Opportunities register.

An on-demand External advisory board can be set up to study ESG transformation initiatives and their impacts on Business Partners, Suppliers, Customers, & Consultants.



6. Assurance & Assessment program

We have been certified for the following Standards:

- ISO 9001 and ISO27001 for Cloud Solutions
- Different security certifications related to key industry markets, such as HDS & HIPAA (Health) and ENS (public market) for our Cloud Solutions.

We also ensure that all our manufacturers are ISO14001 certified.

Corporate Sustainability Reporting Directive (CSRD) best practices and the Responsible Business Alliance Code of Conduct guide our ESG activities.

EcoVadis, Science Base Target Initiative (SBTi) and Carbon Disclosure Project (CDP) yearly assess our progress.