



A Committed Group

Our Group is the expression of all of our actions.

Each of our actions has meaning and reflects our commitment to respecting the planet, people, laws and regulations.

VIGNAL'S CSR POLICY

- 1.1 a CSR policy that embodies the group's vision
- 1.2 dedicated governance
- 1.3 based on common ethical principles.

VIGNAL'S CSR POLICY

- 2.1 participating in the group's transformation... sustainably
- 2.2 CSR indicators, in line with the Sustainable Development Goals (SDGs).

THE CSR FOUNDATION

- 3.1 Code of Ethics
- 3.2 from the Global Compact to the United Nations Sustainable Development Goals (SDGs).

COMMITMENT TO OPERATIONAL EXCELLENCE

- 4.1 the 5 pillars.

THE PRINCIPLES OF OUR CSR CHARTER

- 5.1 respect for human rights and international labour standards
- 5.2 environment - mobilised and committed departments
- 5.3 sustainable procurement - code of conduct for sustainable procurement.

DIALOGUE WITH STAKEHOLDERS

- 6.1 a network of sensors to monitor the changing world.

20 YEARS OF CSR POLICY

- 7.1 shared progress, a core value.

8 csr glossary

"As for the future, it is not a question of forecasting it but of making it possible"

Antoine de Saint-Exupéry

1. VIGNAL'S CSR POLICY

1.1 a CSR policy that embodies the group's vision

Long term COMMITMENT

Vignal Group aims to become a global player in lighting and safety for on-road and off-road commercial and industrial vehicles, while respecting the environment and regulations and implementing an ambitious Corporate Social Responsibility (CSR) policy.

Introduced more than 20 years ago, Vignal's CSR policy has always been a pillar of its growth strategy.

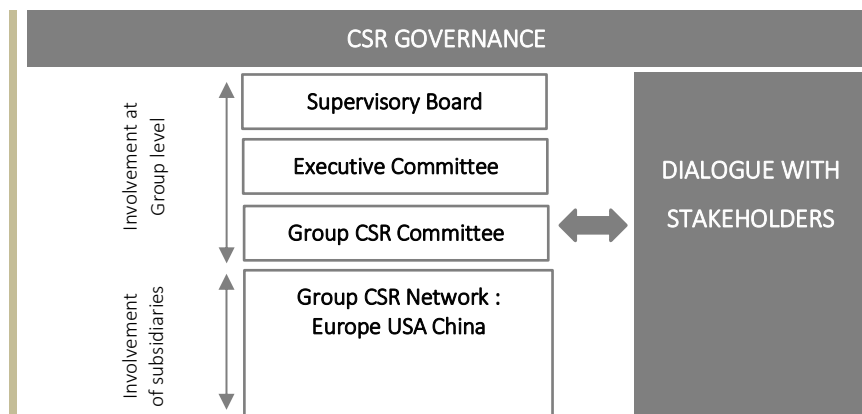
It unfolds within a framework to create and amplify a dynamic of progress around CSR topics.

1.2 dedicated governance

CONDUCT COLLECTIVELY and create intelligent synergies

Vignal's commitment to Sustainable Development is based on governance and commitments that involve managers at all levels, and at the highest level of the organisation. The ways in which this commitment is made are just like our Group: rich and diversified. We are intensifying our efforts and developing innovations to limit the impacts of our activities and we continue to strengthen our CSR capabilities, right up to the Supervisory Board.

A UNIFIED vision



**SHARED
commitments**

COMMITMENTS		
Code of Ethics	Code of conduct for sustainable procurement	ISO 14001
CSR Charter	United Nations Global Compact	IATF 16949

1.3 based on common ethical principles.

**VALUES
internationally recognised**

The CSR policy is defined in accordance with Vignal's ethical principles and by its desire to respect and promote the principles affirmed by:

- the Universal Declaration of Human Rights;
- ILO core conventions including Convention 29 concerning forced or compulsory labour, Convention 87 concerning freedom of association and protection of the right to organise, Convention 98 concerning the application of the principles of the right to organise and collective bargaining, Convention 100 concerning equal remuneration for men and women workers for work of equal value; convention 105 concerning the Abolition of Forced Labour, Convention 111 concerning Discrimination in Respect of Employment and Occupation, Convention 138 concerning Minimum Age for Admission to Employment, Convention 182 concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour;
- the United Nations (*Global Compact*), which the Group joined in 2015.
- the 17 United Nations Sustainable Development Goals.
- the 2030 Agenda, designed for people, planet, prosperity, peace and partnership. It conveys a perspective of transforming our world by eradicating poverty and ensuring its transition to sustainable development.

2. Vignal's CSR strategy

2.1. participating in the group's transformation... sustainably

A PRESENCE on the 3 continents

Vignal Group is a global company that wants to offer the best products and services to earn the trust of its customers.

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Our industrial coverage on the three continents where our main customers are located (America, Europe, Asia) allows us to reduce intercontinental transport, minimize our environmental footprint, limit CO2 emissions and offer the best flexibility and responsiveness to our customers.

Our subsidiaries;

- have a "Best in Class" industrial tool to guarantee the best level of quality, to be competitive and reactive anywhere in the world.
- are developing new product ranges to reduce the energy consumption of our customers' vehicles.
- offer ambitious or even disruptive technological innovations capable of attracting their own customers' interest.

2.2 CSR indicators, in line with the Sustainable Development (SDGs).

FOLLOW THE PROGRESS and identify areas for improvement

Vignal monitors CSR indicators for all its subsidiaries. These indicators are enhanced by CSR concerns, stakeholder interest, risk factors, and the opportunities arising from the Sustainable Development Goals (SDGs).

These indicators provide information on our level of maturity in terms of CSR, and support an action plan to embody the values we defend on a daily basis.

Our long-term successes are based as much on the strength of Vignal's business model as on our environmental and social footprint.

3. The CSR foundation

3.1. Code of Ethics

TRANSMISSION pillar

The Code of Ethics embodies a set of principles and rules that guide the group in the conduct of its business and guides each employee in the exercise of their or her responsibilities, regardless of their position or whether he or she belongs to a group subsidiary.

The Code of Ethics represents a strong moral commitment and a principle of trust essential to the sustainable development of the Vignal Group's activities.

INTEGRITY towards all stakeholders

- compliance with international standards
- respect for human rights
- respect for people
 - social rights
 - working environment
 - health protection and safety
 - employment, wages, working time
 - staff development / professional equality
 - freedom of association and right to collective representation
 - anti-discrimination/harassment
- respect for the environment
- fight against corruption

INTEGRITY in business relationships

- compliance with competition laws
- fight against corruption and influence peddling
- combating money laundering
- conflicts of interest - employee loyalty
- customs, export control and embargo compliance

INTEGRITY of the property

- data protection and confidential information
- use of assets
- anti-counterfeiting and intellectual property
- respect for privacy and the protection of personal data

INTEGRITY in our communication

- financial accountability - integrity and reliability of accounts
- political and associative activities
- computer science
- use of social networks - public communications
- protective warning approach
- the golden rule.

3.2. from the Global Compact to the United Nations Sustainable Development Goals.

CONTRIBUTE to the wider initiative international sustainable development policy

Vignal Group joined the United Nations Global Compact in 2015 and publishes an annual Communication on Progress (Cop).

This document describes the progress made by the subsidiaries with regard to human rights, international labour standards, environmental protection and the fight against corruption.

If Vignal strives to be different through a permanent search for excellence, this quest implies an exemplary approach in terms of ethics, social responsibility and respect for the environment.

These values are reflected in the Sustainable Development Goals (SDGs) that we support and defend.

from the 10 principles of the Global Compact to the 17 UN Sustainable Development Goals



- HUMAN RIGHTS
- INTERNATIONAL LABOUR STANDARDS
- ENVIRONMENT
- FIGHT AGAINST CORRUPTION

4. **Commitment to operational excellence**

the 5 Pillars

DELIVERING EXCELLENCE of our products and services

Operational excellence is a pillar of the Vignal culture. This commitment to excellence is applied on a daily basis in all the group's subsidiaries. With one ambition: to satisfy customers by meeting their requirements in terms of quality, costs and deadlines. To achieve this goal, Vignal uses the "5 Pillars" methodology.

Involvement of subsidiaries

Involving staff means recognising their skills and improving them through training, giving them the means to exercise responsibilities, encouraging them to make proposals for improvement and to participate actively in the operation of an autonomous production team.

Vignal Production System

VPS is designed to improve the productivity and quality of products and systems. The means implemented are: the pull flow organisation, the flexible production means, the reduction of all unproductive operations and the stopping of production as soon as there is a problem.

Constant Innovation

In order to design innovative, easy to manufacture, quality products at the best possible cost , while reducing development times, Vignal has generalised the organisation into Project Teams and the simultaneous study of products and processes.

Supplier integration

Supplier integration allows us to benefit from their capacity for innovation, to develop productivity plans with them and to improve quality. Vignal wants to establish and maintain close and mutually beneficial relationships with a limited number of the world's best suppliers over the long term.

Absolute Quality

Absolute quality is about customer satisfaction. To meet their expectations of product and service quality, it requires the full, continuous and rigorous application of the 5 Pillars. It is implemented by all members of the company and suppliers.

5. The principles of our CSR charter

5.1. respect for human rights and international labour standards



LISTEN, INCLUDE, VALUE women and men

United Nations / Code of Ethics

The Group is committed to respecting and promoting the Ten Principles of the United Nations Global Compact and makes its best efforts to support internationally recognised values and fundamental rights.

Furthermore, Vignal is committed to communicating annually on the United Nations website the progress achieved in terms of social responsibility at Group level.

In addition, the Code of Ethics embodies a set of principles and rules that guide the group in the conduct of its business and each of us in the exercise of our day-to-day responsibilities. Professional, individual and collective integrity is a key value of the Group.

Respect for fundamental rights

The Group is committed to respecting human rights in its business activities. The employees' working conditions shall be dignified and in accordance with applicable local and international legislation.

The Group does not practice or benefit from any form of servitude, human trafficking, or slavery, and is committed to respecting the provisions of the ILO Convention on Forced Labour. The Group prohibits child labour and does not employ people under the minimum age required by the laws of each country where they work.

The Group is committed to prohibiting all forms of discrimination based on gender, age, origin, religion, sexual orientation, physical appearance, health, marital status, political opinion, pregnancy, trade union membership or disability. Also, all forms of harassment, threats of violence, abuse, coercion or physical punishment.

The Group respects the right of employees to receive fair compensation, strives to ensure decent working hours, promotes gender pay and encourages profit-sharing schemes.

Social dialogue

The involvement of all employees through social dialogue is a guarantee of success for the policies undertaken by Vignal. Vignal defends respect for fundamental rights and promotes open communication with the social partners.

The Group considers that the social partners are essential relays for understanding, discussing and adapting the action plans implemented in the company.

Health and safety

With regard to the health and safety of employees at work, the Group regularly conducts risk management audits, implements a certification programme for its subsidiaries and provides ongoing training for employees to learn and share good behaviour and to deepen the safety rules related to Vignal's businesses. The Group pays particular attention to the regulatory compliance of its resources and facilities, and to risk prevention (fire, electrical, handling, hazardous products, etc.).

Vignal participates in the subscription of insurance and pension plans.

Quality of life at work / well-being

The Group works to continuously improve the quality of life at work for its employees by guaranteeing them:

- a work environment that avoids the risk of accidents by providing ergonomic workstations and preventing psychosocial risks. This is a major element of the Group's values;
- a work-life balance by promoting the right to disconnect and telework if necessary;
- recognition and support for their work;
- prevention of harassment and discrimination;
- their autonomy;
- the implementation of "Health / Well-being" barometers at work.

Vignal shares a company project with all its employees to give them visibility on its development.

Gender equality and diversity

Vignal is committed to respecting, in comparable situations, equality between men and women in terms of career development, training, remuneration, promotion and parity. The gender equality indexes are completed.

Vignal promotes diversity in all its subsidiaries in terms of disability, generations, gender and culture. This is an essential performance lever for the Group.

Skills development

The Group involves its employees in its development and encourages everyone to participate in professional training. By developing the skills of its employees, Vignal promotes their employability in a socially responsible manner.

The competent teams enable Vignal to bring added value to its customers, all over the world, and to accompany their technical and geographical development.

Professional integration of young people

Vignal continues to develop its policy of relations with educational institutions by developing links with schools and universities. These initiatives in favour of youth employment and their integration into the professional world allow Vignal to welcome interns, young people on apprenticeship or professional training contracts and candidates for the Volontariat International en Entreprise (VIE).

Employer Branding

To develop its attractiveness and assert itself as an employer, Vignal maintains a presence on social networks. This communication strategy allows for the promotion of innovative solutions, while encouraging interaction and exchange of people likely to apply to Vignal. Having qualified teams enables Vignal to meet the expectations of customers, all over the world, and to provide added value in terms of innovation, total quality, competitive solutions and services.

Stakeholders

The Group does its best to develop a multi-stakeholder approach. The Group's sustainable development policy is based on strong relationships with its stakeholders, which may include customers, employees, research and development partnerships, partners and service providers, institutions, territories, the financial community and individual shareholders.

Commitment to local ecosystems

Vignal's subsidiaries contribute to the vitality of the economic, social and societal fabric of the area in which they are located. Vignal weaves a local ecosystem and promotes the implementation of local initiatives according to locally identified needs and in line with the capacities of each site. The areas of Vignal's social commitment are diverse; cultural, sporting, charitable actions, etc.

Information system and personal data

Protecting the information system and its data is an important issue for Vignal.

Whether it is a question of intangible capital or the protection of personal data, Vignal does its best to reassure its stakeholders through its ability to anticipate, reduce vulnerabilities and manage incidents that may occur, in compliance with laws and regulations.

5.2. environment - mobilised & committed departments



ORGANISING TO ACT effectively for the environment

ISO 14001 Certification

For more than 20 years, the Group has been committed to a management system certification process in order to give concrete expression to its commitment to reducing its environmental impact and improving the health and safety conditions of its employees.

ISO 14001 environmental certification is a guarantee to stakeholders of the Group's strong commitment to Health, Safety and Environment issues. The current practice is to certify all subsidiaries.

Compliance with national and international legislative and regulatory constraints on environmental law is a major challenge for the Group.

Research and development

Vignal maintains a high level of research and development and offers its customers the best technological innovations to meet their needs.

The world of industrial vehicles is undergoing an environmental paradigm shift. Based on a global approach, Vignal wants to be a real catalyst that promotes the emergence of innovative technological solutions within its value chain in connection with the environmental transformations of the sector. Vignal devotes a large budget to developing innovations that reduce polluting emissions.

Eco-design of products

The eco-design approach is implemented within the Group's Research and Development department and aims to reduce CO2 emissions, ensure the recyclability of materials and the safety of materials, and extend the life of products. These guidelines also make it possible to better structure the design of new products around sustainable development criteria.

Industrial management

The industrial department is at the core of the Group's "global design/local production" strategy. Vignal is giving itself the means to implement this strategy by investing heavily in all its sites. The industrial subsidiaries are equipped with human and material resources to ensure compliance with the regulations in force and the same standards throughout the world.

The Industrial Directorate, in conjunction with the other directorates, develops a policy for the health and safety of people, the environment, security and safety of buildings and installations. The industrial department also works on crisis prevention and emergency planning.

Quality department

Absolute Quality is the foundation of Vignal's sustainable and profitable development. Delivering products and services of the highest quality standard is the daily objective of Vignal's employees. The Quality Network represents the Customer within our organisation and implements the policy to ensure that each subsidiary meets the quality and environmental standards of the sector. Quality within the Group is built and controlled through methodologies, high level standards and continuous improvement processes.

Absolute quality and product safety

The Group relies on an organisation and resources to ensure the safety and quality of its products. This ambition is based on a total quality requirement: a daily obsession for all employees, the 5 Pillars system is centred on customer satisfaction, the QRQC (Quick Response Quality Control) culture, compliance with regulations and environmental standards, methodologies and standards at the highest level for project management, integration of suppliers, and this is systematically associated with a continuous improvement process.

Commitment to the circular economy

The Group is committed to the circular economy in the following two dimensions:

waste prevention and management :

- recycling of waste from the production process
- reuse of packaging materials
- use of returnable packaging
- optimising transport, via 'milk rounds',

sustainable use of resources, with policies and action plans for :

- water consumption and supply
- consumption of raw materials and improved efficiency in their use
- monitoring and limiting discharges.

Environmental policy

For nearly 20 years, Vignal has demonstrated its commitment to limiting the impact of its activities on the environment. The Group also includes commitments in its Environmental Charter.

Vignal is doing its best in the framework of its sustainable development policy to:

- ensure compliance of activities with applicable legislation and international agreements;
- implement the ISO 14001 environmental management system at all sites;
- improve the environmental performance of processes;
- optimise the transport of people and products to reduce greenhouse gas emissions;
- limit the use of natural resources and promote the use of renewable energy;
- eliminate hazardous substances or control the risk associated with their use.

Purchasing Department

The main tasks of the Purchasing department are to seek out competitive service providers and to implement the innovation, total quality and CSR approaches in order to establish solid partnership relationships.

The Purchasing network is active in all the Group's subsidiaries. This global presence allows it to develop and be close to service providers, and to ensure that service providers comply with the Code of Conduct for Responsible Purchasing. The purchasing department plays a major role in the "global design/local production" strategy.

Reduction of chemical and hazardous substances

The Group pays particular attention to the elimination or reduction of hazardous substances in the composition of its products. The EU regulation, REACH, establishes a single system for the registration, evaluation, authorisation and restriction of chemicals.

In order to guarantee its compliance with REACH regulations, Vignal has set up a specific organisation and appropriate tools, which guarantee control of product knowledge and ensure communication with external players on the subject, particularly *via* the IMDS (*International Material Data System*) tool.

Reduction of greenhouse gas emissions - carbon footprint

Vignal is actively working to reduce its greenhouse gas emissions. There are many actions: offering eco-designed and sustainable products with low energy consumption, increasing the energy efficiency of processes and installations, using renewable energy where possible, reducing transport, etc.

Since 2009, Vignal has been carrying out its carbon assessment, covering Scope 1, 2 and 3. This annual assessment of our greenhouse gas emissions allows us to define and validate our low carbon strategy.

Measuring overall performance

Non-financial performance indicators in the areas of governance, social/societal responsibility, environment and responsible purchasing are monitored within the Group. These indicators are formalised as part of a collaborative approach in conjunction with the departments concerned.

5.3. responsible purchasing - code of conduct for responsible purchasing



A DYNAMIC AND DEMANDING policy

Application of sustainable development principles in the purchasing process

The framework of the sustainable development ambition in Purchasing policy aims to:

- understanding the risks of supply chain disruption by taking into account so-called sustainable development factors (governance, social, environmental, fundamental rights, etc.);
- strengthen the competitiveness of service providers by guiding them towards continuous improvement practices in terms of optimising logistics and environmental costs, reducing energy costs, etc. ;
- become firmly grounded in local ecosystems, by applying a policy of locating purchases at a regional level.

Location of purchases according to consumption areas

The Group favours a location strategy compatible with the requirements of economic competitiveness and participates in the local integration of the economy. This strategy applies to all regions where the Group operates.

This proximity reduces transport-related CO2 emissions, supports local employment by developing skills and satisfies the expectations of local stakeholders (customers, local authorities and governments) who are increasingly calling for local integration.

Evaluation of service providers' sustainability practices

Given the sustainable development ambition described above, Vignal does its best to implement a policy of attention to its service providers on key points: CSR approach, health and safety, environment, labour rights and ethics, etc. These control points are measured through questionnaires or audits. These control points are measured by means of questionnaires or audits.

Vignal intends to bring its experience as a responsible company to its service providers by disseminating its quality and responsibility requirements, and by setting an example to encourage its own service providers to deploy the same principles throughout the supply chain.

Minerals from conflict zones ("conflict minerals")

In 2013, in accordance with the provisions of US law 15 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 21 July 2010 relating to "conflict minerals", and with the aim of putting an end to the financing of violent conflicts in the Democratic Republic of Congo and surrounding countries (financed in part by the exploitation of and trade in minerals), Vignal's Purchasing Department formalised its expectations with regard to its service providers in its Responsible Purchasing code of conduct.

Code of conduct for sustainable purchasing

The Code describes Vignal's expectations in terms of ethics and compliance with its service providers.

The Code sets out the minimum standard to be met, and does not replace applicable national and international legislation, with which providers must strictly comply.

The principles outlined in the Code of Conduct for Responsible Procurement are based on the Ten Principles of the United Nations Global Compact, the conventions of the International Labour Organisation, and the declarations on human and children's rights.

1 - Respect national and international laws and regulations.

2 - Adhere to human rights in the employment relationship :

prohibit child labour, not use forced labour and slavery, pay fair wages, ensure decent working hours, ensure freedom from discrimination, harassment and inhumane treatment, ensure diversity, protect health and ensure safety and hygiene in the workplace, respect freedom of association and freedom of association.

3 - Reduce economic dependence. **4 - Ensure** confidentiality of information. **5 - Fighting** against corruption and money laundering.

6 - Avoid any conflict of interest. **7 - Fighting** anti-competitive practices.

8 - Respect the environment. **9 - Committing to sustainable procurement** minerals from high-risk regions: international and UN regulations.

10 - Adhere to all service providers to the CSR issues of our Code of Conduct for Responsible Procurement.

6. Dialogue with stakeholders

6.1. a network of sensors to monitor the changing world. . .

DEVELOP & CO-CREATE projects or innovative partnerships

For many years, Vignal has maintained a regular and constructive dialogue with its stakeholders at local and national level in each of the countries where it operates. This dialogue is intended to be open and qualitative, with the

aim of developing and co-creating innovative projects or partnerships. This dialogue with stakeholders is a lever for creating links, innovation and added value.

multiply exchanges

rely on experts

employees	ensure a continuous dialogue with employees and leaders of trade unions and professional organisations in order to develop a good social climate.
providers	cooperate and co-construct in compliance with competition law and fundamental rights.
R&D partners	establish R&D cooperation to organise exchanges of skills, techniques and knowledge.
financial community & shareholders	to act in a dialogue based on the rigour and transparency of the information relating to the Group's results.
territories	ensure the proper interaction of the Group's development with its territorial ecosystem.
institutional	dialogue in compliance with national and international laws and regulations in economic, industrial and social matters.

7. 20 YEARS OF CSR POLICY

7.1. shared progress, a core value.

VISION OF GROWTH which is sustainable and virtuous

The Group's CSR policy aims to respect the planet, people, laws and regulations, and to improve the sustainability of its business model by supporting the trust placed in it by the stakeholders with whom Vignal maintains a constant dialogue. For more than 20 years, we have been placing CSR at the heart of our decisions, and here are the most representative actions.

<p>2000</p> <p>ISO 14001 Certification</p>	<p>2009</p> <p>1st carbon assessment (scope 1,2,3)</p>	<p>2013</p> <p>1st CSR charter 1st ecovadis Gold CSR rating</p>
<p>2014</p> <p>"Global design / Local production" strategic plan</p>	<p>2015</p> <p>Membership Global compact United Nations Group CSR Committee 1st health and well-being barometer</p>	<p>2016</p> <p>New site in Lyon Responsible purchasing policy 1st extra-financial reporting</p>
<p>2017</p> <p>1st conflict minerals assessment CMRT Transformation of the Rancate site Mosinee website development</p>	<p>2018</p> <p>Opening of China site in Changzhou 1st CSR supplier audit Carbon footprint ratio: -40% in 5 years</p>	<p>2019</p> <p>Location of supplies Redesign of the Code of Ethics Achievement index professional equality between women and men</p>
<p>2020</p> <p>CSR policy and actions implemented within the Vignal Group</p>	<p>2020-2030</p> <p>Our CSR approach is based on the long term and is resolutely oriented towards the future. We are constantly raising our standards, the reports that we publish are a way of finding out about our policy, and the many actions we are taking.</p>	

8. CSR glossary

SUSTAINABLE DEVELOPMENT

Official Journal of 12 April 2009

A development policy that strives to reconcile environmental protection, economic efficiency and social justice, with a view to meeting the needs of the present without compromising the ability of future generations to meet their own needs.

CORPORATE SOCIAL RESPONSIBILITY CSR Platform January 2016

Corporate social responsibility is defined as "the way in which companies integrate, on a voluntary basis, social, environmental and ethical concerns into their economic activities as well as their interactions with all stakeholders, whether internal (managers, employees, shareholders, etc.) or external (service providers, customers, etc.)".

UNITED NATIONS GLOBAL COMPACT United Nations Global Compact 12 April 2010

The Global Compact is a voluntary initiative to promote universal principles of human rights, labour relations, environmental protection and anti-corruption. It is based on the active engagement of industrial and commercial enterprises, in cooperation with civil society and trade union representatives.

SUSTAINABLE DEVELOPMENT GOALS (SDGs)

The Sustainable Development Goals (SDGs) set out 17 priorities for socially equitable, environmentally secure, economically prosperous, inclusive and predictable development by 2030. They were adopted in September 2015 by the UN as part of the 2030 Agenda.

AGENDA 2030

The 2030 Agenda is a universal agenda adopted by the UN in September 2015, including governments and civil society. It sets out goals to be achieved by 2030 to eradicate poverty in all its forms and in all countries, protect the planet and ensure prosperity and peace for all.

VIGNAL . CSR Charter

CSR Charter
Industrial and CSR Department
Vignal Group - April 2021.

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