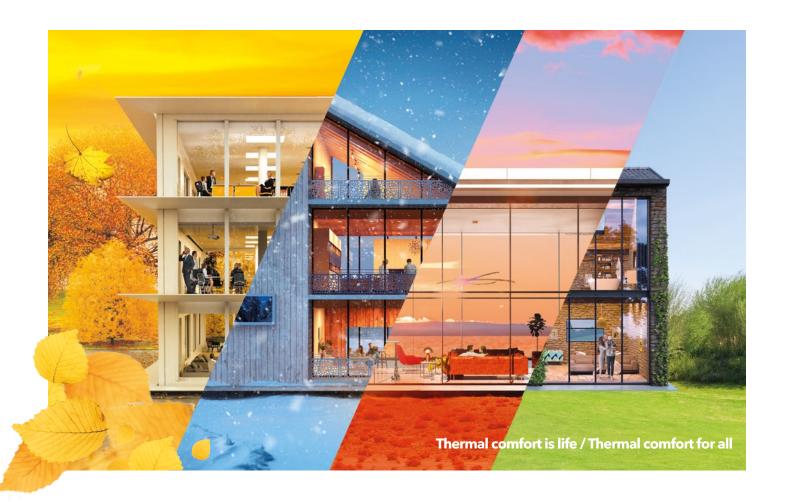


EXTRA-FINANCIAL , 2021 FINANCIAL YEAR PERFORMANCE REPORT

ATLANTIC FRENCH COMPANY SPECIALISED IN THERMAL COMFORT SOLUTIONS

Public limited company with an Executive Board and Supervisory Board, and capital of €14,032,400 44 boulevard des États-Unis | 85000 La Roche sur Yon | 562 053 173 RCS La Roche sur Yon





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At GROUPE ATLANTIC, the sustainable development strategy launched in 2009, with its first founding element, the Group's Environmental Declaration. The latter outlines the guiding principles of the Group's policy. It is published in full in section 6 of this document.

As part of a more formalised, global approach that considers social and environmental challenges, in 2014 GROUPE ATLANTIC decided to establish an internal organisation to oversee its social and environmental responsibility. This led to the creation of the CSR Committee. Meeting twice a year, this Committee comprises members of Group General Management, the Industrial Department, the Purchasing Department, the Innovation/Public Affairs Department and the CSR Department.

2021 saw a further milestone with the creation in September of a Group CSR Department. This department is tasked with accelerating the Group's environmental, social and societal practices in the years ahead, both in France and abroad.

COMPRISING FOUR MEMBERS, THE CSR DEPARTMENT FOCUSES EFFORTS ON ENVIRONMENTAL ASPECTS IN TWO MAIN ACTIVITIES:

1. Products

- Product life cycle assessments: Product Environmental Profiles (sheets PEP) ecopassport®
- Monitoring of supplier hazardous substances
- F-gases declaration (quotas on fluids)

2. Sites

- Support for industrial sites' environmental approach, particularly through the coordination of a community of field-based Environment experts
- / Management of carbon/energy accounting at Group sites
- Preparation and monitoring of in-house and customer environmental audits
- ✓ Internal review and roll-out of circular economy regulatory provisions (e.g., France's AGEC law against waste for a circular economy)

Regarding **Social and Societal aspects**, the CSR Department works alongside other Group departments (HR, Purchasing, endowment fund, etc.) in an effort to consolidate data, establish reporting Key Performance Indicators (KPIs), and kick-start new projects in these fields to elevate the Group's CSR performance.

The CSR Department is also involved in drafting several Group CSR publications: Extra-Financial Performance Report, Sustainable Development Report, CSR Policy Note.

This department is responsible for CSR reviews/questionnaires from customers and partners. The CSR Department participates in CSR practice audits performed by the sustainability ratings provider, EcoVadis. In 2021, the Group scored 51/100 (Bronze), ranking above the Manufacturing Industry average (48.8/100). In accordance with legislation on social, environmental and societal information, GROUPE ATLANTIC has used the approaches outlined above to establish this Extra-Financial Performance Report, which includes the following components.

Atlantic Société Française de Développement Thermique, through all of its subsidiaries and holdings (hereinafter referred to as **GROUPE ATLANTIC**), contributes to the development and marketing of climate control engineering products.

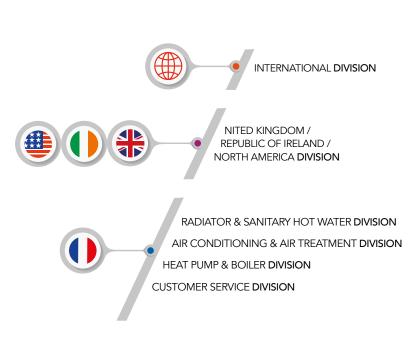
GROUPE ATLANTIC has set itself the following mission:

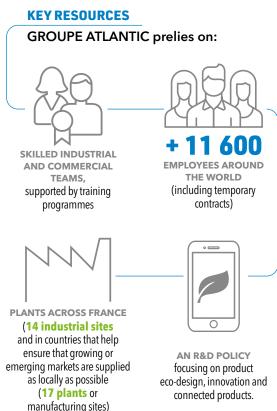


Water heating, air heating, energy management, air conditioning and ventilation: GROUPE ATLANTIC develops high-performance solutions that are both competitive and environmentally friendly. They are designed for individual homes, collective housing, offices, shops, schools, airports, hospitals and all other tertiary buildings.

In order to preserve its ability to grow rapidly and develop a relevant offer for each of its markets, GROUPE ATLANTIC is organised into divisions. Such specialisation enables us to benefit from the best talents and best practices in each of our areas of expertise.

The six divisions of GROUPE ATLANTIC collaborate daily to promote synergies in terms of innovation and customer support.





ACTIVITIES (PRODUCTION, DISTRIBUTION, etc.)

GROUPE ATLANTIC performs the following activities:

- In the manufacture of climate control engineering products heating, sanitary hot water and ventilation through various ranges using energies such as electricity, fossil fuels and renewable energy.
- / Distribution of the climate control engineering products that it manufactures, as well as air conditioning products.
- Services relating to the products sold, such as maintenance, repair, training and pre-sales in cooperation with engineering and design offices.

Products are manufactured by plants in France and abroad.





Each Group brand boasts specific expertise and positioning. Whether they are working for the end consumer or professional customers, they all share the spirit of innovation, product quality and a sense of service.

residential and tertiary markets all over the world: heating (connected radiators, heat pumps, boilers, etc.), sanitary hot water, air-conditioning and ventilation.

Thermor © Connected radiators, electric and renewable energy water heaters, swimming pool heat pumps: Thermor is France's leading expert on heat.

Sauter Radiators, water heaters and ventilation systems, all easy to install when renovating your home, on sale in France to the mass market.

YGNIS The benchmark in mainland Europe (outside France) for commercial heating systems for housing and tertiary buildings.

lazzarini Italian-designed radiators and bathroom radiators for European markets.

erensan Commercial heating for residential buildings; heating, steam and pressurised water for industrial sites: Erensan is one of the Turkish leaders in these markets.

Austria Email Specialist in sanitary hot water, with a full range of top-quality electric water heaters, renewable energy and indirect storage tanks.

Hamworthy Specialist UK manufacturer of premium commercial boilers with heating, hot water and renewable solutions for residential and commercial buildings.

The specialist in wall-mounted 'double-flow' condensing boilers for light commercial and larger domestic properties in the UK.

G GLEDHILL UK specialist manufacturer of duplex stainless steel and copper hot water cylinders and heating solutions for domestic, commercial and industrial use.

Market-leading manufacturer of wall-mounted and free-standing condensing boilers for UK commercial and industrial applications.

Triangle Tube The North American specialist in heating and hot water products for the residential and commercial markets.

ACV A Belgian brand that offers a wide range of heating and hot water products for the domestic, tertiary and industrial markets.

ORCON Dutch specialist in ventilation systems for homes as well as commercial and tertiary buildings.

INNOVERT Hydraulic heating and cooling ceiling solutions, for new builds in France.

edesa A brand for the Iberian market with a range of domestic hot water products for the general public.

TEPLOLUXÉ F loor heating cable and temperature control specialist.

HAUTESWärmepumpen German leader supplying low global warming potential (GWP) heat pumps for residential markets (individual and collective).

THERMIC ENERGY
Regenerative Energie

German expert in buffer and sanitary hot water (SHW) tanks, which are increasingly installed in a heating and SHW installation using renewable energies (heat pump, thermal solar, biomass, etc.).

saving ventilation systems for residential and commercial applications.

MARKET, PRODUCTS, CUSTOMERS

Climate control engineering products are an integral part of the construction market, since they cover heating, ventilation and air conditioning of buildings.

Access to the new build market for climate control engineering products involves:

- ✓ National legislation, particularly in terms of construction regulations.
- / Construction development programmes.
- / Market price trends (crises, speculative bubbles).
- / Measures encouraging property ownership (government incentives, financial resources of purchasers).

In the renovation market, there are significant needs due to:

- / The age of some residential buildings.
- ✓ The desire for energy savings, particularly as a result of rising energy costs (oil, gas, electricity) and political ambitions to reduce greenhouse gas (GHG) emissions (CO₂).
- ✓ Attempts to increase buildings' energy efficiency.

Some local legislative bodies support the renovation market through financial and/or tax incentives in order to ensure improvements are made to buildings and residences.

PRODUCTS

Climate control engineering products are also dependent on the energy market. In France, for example, with the adoption of RT2012 legislation, heating and domestic hot water production via the use of electricity was pushed into the background in the construction of new collective housing. Regulation covering more specific situations in terms of energy in new builds is still evolving. The RE 2020 legislation should restore balance in the energy mix for construction, as it will reintroduce options for using electricity products primarily via the use of heat pump technology. This solution is now the preferred one in the individual new build homes market. Gas solutions will continue to be used for collective housing until 2025, when CO₂ emission requirements will become more stringent.

In the United Kingdom, the regulation now forbids new builds from using gas-powered heating. This involves a change in direction for products offered by the company - Ideal Boilers. All of these aspects work in favour of products that are powered by renewable energies and/or are more energy efficient, with lower GHG emissions (CO_2).

Regulations and legislation have been adopted in France and throughout Europe with a view to implementing eco-design for products that use energy, regulating efficiency and energy performance and reducing GHG emissions. These regulations have a significant impact on consumption choices and on the industrial strategies of the main players in the climate control engineering market.

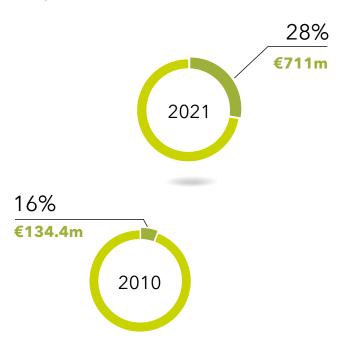
GROUPE ATLANTIC offers a wide range of climate control engineering products, in heating and sanitary hot water (including sanitary hot water equipment) as well as ventilation and air conditioning.

Whether conventional or just emerging, all energies catch the Group's interest, provided that their mid-and long-term relevance is validated.

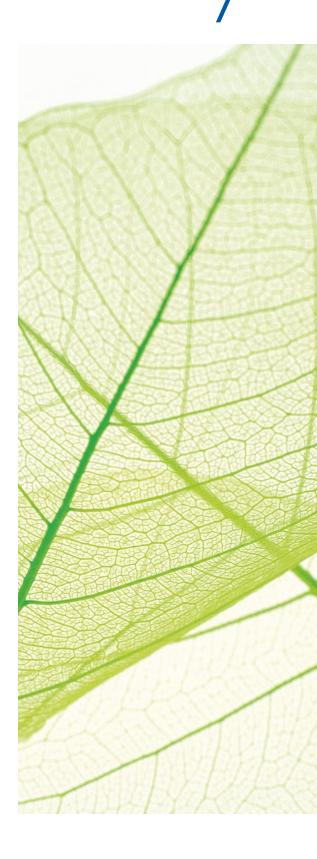
BREAKDOWN OF THE ENERGY MIX

GROUPE ATLANTIC is continuing its decarbonisation strategy through ever-developing renewable energy (RNE) products. As a result, the Group's net turnover from RNE⁽¹⁾ solutions has increased fivefold since 2010:

KPI: percentage of products using RNE solutions from Group total net turnover



In the Group's first two Extra-Financial Performance Reports, a turnover breakdown of the energy mix was presented by product type. The presentation of data using the first breakdown is no longer monitored the same. As such, from this financial year, GROUPE ATLANTIC decided to use the following KPI in an endeavour to produce relevant energy mix reporting: percentage of net turnover of products using RNE solutions from Group total turnover.



(1) As defined by the European Renewable Energy Directive EU 2018/2001

- Heat pumps Air/Air (Air conditioning)
- Hydraulic heat pumps (Aerothermal & Geothermal)
- Heat pump and solar water heaters

INDIVIDUAL SOLUTIONS

Radiators and bathroom radiators	Electric and renewable energies water heaters (from 15 to 400 L)	Gas, fuel oil and wood boilers	Heat pumps and hybrid solutions	Air conditioning and ventilation
•		and the same of th		
Connected radiator	Electric water heater	Gas condensing wall-mounted boiler	Heat pump for heating and hot water	Dual-flow ventilation
Bathroom radiators	Heat pump water heater	Hybrid gas and solar boiler	Hybrid gas and heat pump boiler	Mono and multi-split air conditioning

COLLECTIVE AND TERTIARY SOLUTIONS

COLLECTIVE AND TERMAN SOLOTIONS							
Commercial boilers (from 34 to 10,000 kW)	Industrial boilers	Collective sanitary hot water (from 300 to 5,000 L) Boiler room equipment		Air conditioning and ventilation (from 80 to 11,000 m³/h)			
		X TO		TO DE LA COLONIA			
Free-standing gas condensing boiler	High pressure hot water boiler (465 kW - 23 MW)	Gas sanitary hot water equipment	Filling module	Air handling unit			
	ationic						
Modular gas condensing boiler	Steam boiler (250 kg/h - 30 t/h)	Commercial heat pump water heater	Heat interface unit	Central air conditioning			

CUSTOMERS

The Group's customers primarily stem from two networks:

- a professional network of distributors, wholesalers and installers;
- a network focused on large-scale distribution channels, such as DIY superstores.

TRENDS AND OUTLOOK

GROUPE ATLANTIC has set itself up for further growth, thanks primarily to the energy and low-carbon transition, which has a significant impact on products for the building sector. It plans to support this growth with more economical means of production and by developing new products to address the public's environmental concerns.

The Group invested in France with the construction of a boiler manufacturing site

in the town of Boz (south eastern France). GROUPE ATLANTIC also pursued its objectives of extending its product ranges and strengthening its positioning in the green and eco-efficient energy sector. On top of this, the Group expanded its foothold in specific European countries with the 100% acquisition of Hautec Group (Germany) and Ventiline (Belgium) as well as a considerable stake in Thermic Energy (Germany).

Investment plans are set to remain significant in the short term, particularly from an industrial standpoint with the construction of a new plant in Istanbul (Turkey) in 2022.

At the time of writing this report, the geopolitical situation in Ukraine will certainly have impacts that are not yet measurable, both on production and marketing of products in Ukraine and on Russian subsidiaries due to the sanctions against Russia.

GROUPE ATLANTIC AROUND THE WORLD* Europe Asia Africa - Middle East 31 INDUSTRIAL SITES FRANCE AUSTRIA - Fontaine - Saint-Louis THAILAND UKRAINE Hyderabad (JV) **Americas** Meyzieu Vinay - Billy-Berclau - Billy-Belciau - Trappes - Aulnay-sous-Bois - Pont-de-Vaux BELGIUM RUSSIA TUNISIA UNITED KINGDOM Hull Blackpool GEORGIA EGYPT SLOVAKIA TURKEY Cauroir Cairo (x2) (JV) Orléans GERMANY Nová Dubnica - Istanbul - Izmir - Bedburg-Hau - Borna La Roche-sur-Yon - Yozgat AUSTRIA - Knittelfeld UKRAINE - Kharkov (JV) CHINA GERMANY THE NETHERLANDS POLAND - Varsovie - Włocławek (Representative office) Weiden BELARUS Mülser TURKEY UNITED KINGDOM 43 COMMERCIAL SITES Hull Blackpool Fife CZECH REPUBLIC PORTUGAL - Lisbon BELGIUM UNITED ARAB EMIRATES EGYPT ITALY RUSSIA Poole New in 2021: - Dworp - Oudsbergen Castronno Sudbury - Conegliano - Faenza FRANCE SPAIN VIETNAM CHILE - Santiago (JV) - Arcueil - La Roche-sur-Yor - Meyzieu Barcelone UNITED STATES Ho Chi Minh City New industrial sites: KAZAKHSTAN Blackwood Warwick - Germany (Hautec and Thermic Energy) SWITZERLAND - Belgium (Ventiline) Orléans - Ruswil - Hergiswil

- Toussieu

^{*}Informations as of 1 January 2022

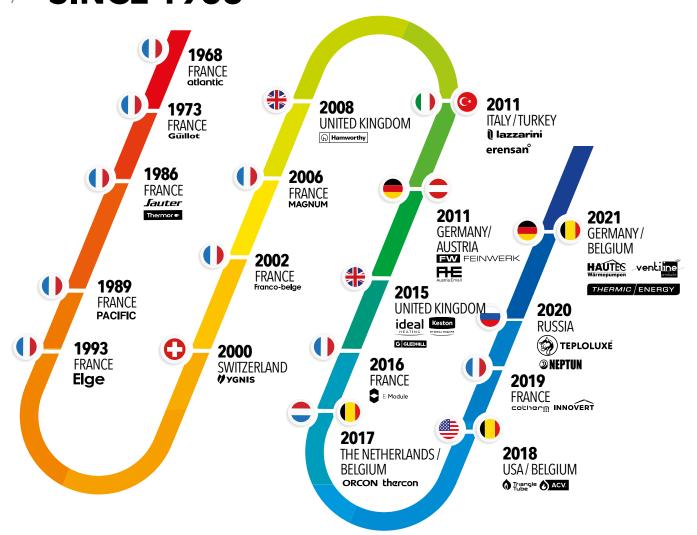




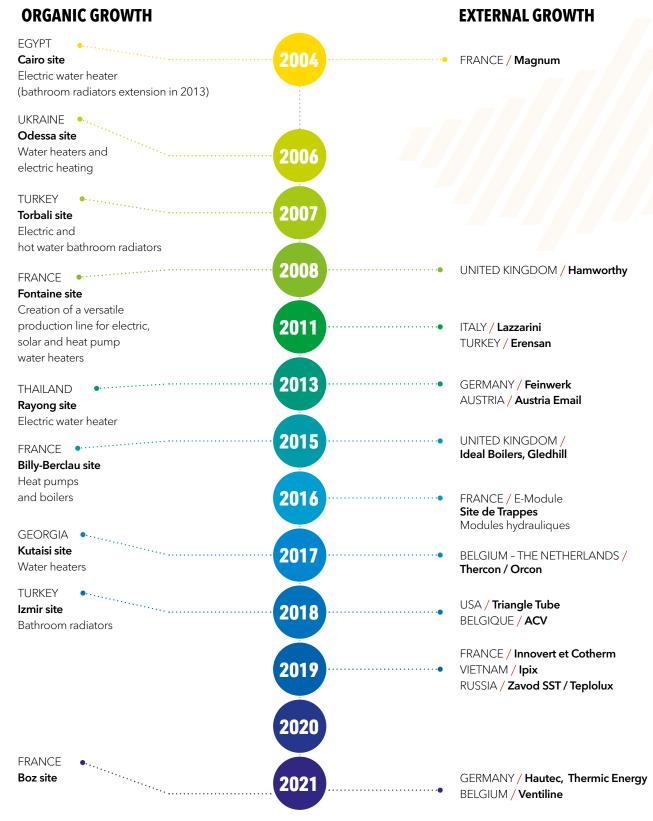




GROUP ACQUISITIONS SINCE 1968



EVOLUTION OF THE GROUP SINCE 2004 ORGANIC AND EXTERNAL GROWTH



The Group published its first Extra-Financial Performance Report for the 2019 financial year. This document has since been amended in line with the Group's values with the aim of improving and increasing the relevance of the information available to all stakeholders.

In this regard, GROUPE ATLANTIC developed risk mapping to more accurately categorise subjects and risks specific to Group activities.

Recognising the latest wording of Article L.225-102-1 of the French Commercial Code ("Code de commerce"), all required subjects were thoroughly examined during preselection before completion of assessments. This was based on:

- The consequences of climate change on the company's activities and the usage of the goods and services it provides;
- / Societal commitments to sustainable development;
- Societal commitments to the circular economy;
- Societal commitments to combatting food waste;
- The fight against food insecurity;
- Respect for animal welfare and a responsible, balanced and sustainable diet;
- Collective agreements made within the company and their impact on company economic performance as well as employee working conditions;
- Actions aimed at promoting physical activity and sport;
- Actions aimed at fighting discrimination and promoting diversity and measures taken with regard to people with disabilities.

Certain subjects, which were determined to have little significance in view of the characteristics of the company's activities and environment, were dismissed.

As a result, the following subjects are not covered in this report:

- Societal commitments to combatting food waste;
- The fight against food insecurity;
- Respect for animal welfare and a responsible, balanced and sustainable diet;
- Actions aimed at promoting physical activity and sport.

For the 2021 financial year, the data used for each of the major pillars of this report can be broken down as follows:

	INDICATORS	GEOGRAPHICAL CONSOLIDATION SCOPE	AS A % OF TURNOVER ² AND A % OF WORKFORCE ³	
	Monitoring indicator: number of workers with disabilities	France		
	Monitoring indicator: gender equality index	France	59.23% 43.39%	
	Key Performance Indicator (KPI): Overall staff turnover rate	France	39.23/6 43.39/6	
	Monitoring indicator: cost of training as a % of total payroll costs	France		
	KPI: number of intern training days (internally)	France	58.90% 41.28%	
SOCIAL CHALLENGES PILLAR	Monitoring indicator: % of positions filled internally	France	58.37% 41.27%	
CHALLENGESTILLAR	KPI: number of workplace accidents (permanent and temporary positions)	Plants ⁴	53.36% 79.61%	
	Monitoring indicator: frequency and severity rates	riants	45.10% 77.52%	
	Monitoring indicator: internal survey results	All companies worldwide that were part of the Group in 2018	93.76% 84.45%	
	Rate of absenteeism	Plants⁵	63.22% 42.07%	
	KPIs: - Percentage of products using RNE	France	99.34% 75.79%	
ENVIRONMENTAL CHALLENGES PILLAR	solutions from Group total turnover - Number of product environmental declarations	France	59.23% 43.39% 57.02% 11.41%	
	- Theoretical Waste Electrical and Electronic Equipment (WEEE ⁶) collection rate by the environmental organisation - ECOSYSTEM	Commercial member companies	30.16% 51.10%	
	- Number of sites covered per year through EcoMundo suppliers consultation	Contractually listed companies	30.16% 51.10%	
THIRD PARTIES CHALLENGES PILLAR	Sponsorship initiatives	France & UK	80.03% 56.07%	

The main French commercial companies are Atlantic Société Française de Développement Thermique, Thermor, Société Industrielle de Chauffage and Atlantic Climatisation et Traitement d'Air Commerce (ACTA Commerce). The French industrial companies are Atlantic Industrie, Thermor, Atlantic Climatisation et Traitement d'Air Industrie (ACTA Industrie), Compagnie Industrielle de Chauffe-Eau (two sites), Société Industrielle de Chauffage (three sites), Guillot Industrie (two sites) and Ygnis Industrie (two sites). The main industrial companies outside France, excluding the UK division, are Atlantic ECET (Egypt), GROUPE ATLANTIC Izmir (Turkey), Erensan EIT (Turkey), Atlantic Georgia (Georgia), Ukratlantic (Ukraine), Burnsen (Belgium), GROUPE ATLANTIC Teplolux (Russia) and Austria Email AG (Austria).

Also taken into account were the services companies (either internal – SCGA, GA SYNERGY, EGIDE – or within

the CESC services division), as well as the E-MODULE commercial company. The main UK Division companies are Ideal Boilers, Gledhill and Hamworthy. On principle, with regard to external growth and bringing new companies into the consolidation scope during the financial year, these are not factored into the Extra-Financial Performance Report.

With respect to company information, as GROUPE ATLANTIC does not have access to the entire Human Resources Information System (SIRH), this is based on **networks of local contacts** relative to each issue considered. It is also important to specify that each entity has **control over its own resources and actions**.

- 2 Turnover refers to net turnover outside the Group as of 31.12.2021
- 3 Workforce refers to permanent positions as of 31.12.2021
- $\bf 4$ For details on relevant industrial sites, see page 26
- 5 For details on relevant industrial sites, see pages 28 $\&\,29$
- 6 Waste from Electrical and Electronic Equipment

The risk analysis presented below is the result of initial work completed in 2020. It mainly focuses on all internal risks. This analysis must be developed for upcoming financial years with comprehensive mapping to factor in external risks (stakeholders) and involve more departments within the company. It must include risks assessment and prioritisation.

Initial mapping, which considered more detailed risks, identified the following challenges:



EQUAL TREATMENT:

- Accessibility policy: Group policy implemented on different sites with various levels of engagement depending on awareness and possibility. Monitoring indicator: number of workers with disabilities.
- Gender equality
 Monitoring indicator: gender equality index.

TALENT RECRUITMENT AND RETENTION:

It can be difficult to find people with the relevant skills in certain business fields (industrial, commercial or support) on the labour market. In this context, GROUPE ATLANTIC is developing practices that make it easier to attract top talent.

- Relationships with schools and apprenticeships;
- Internal training for the purposes of skill development.

Monitoring indicator: cost of training as a % of total payroll costs.

KPI: number of intern days.

Monitoring indicator: % of positions filled internally

KPI: rate of staff turnover (with an objective of stability and its maintenance over time).

EMPLOYEE HEALTH & SAFETY AND WORKING CONDITIONS:

Since GROUPE ATLANTIC conducts industrial operations, particular attention is paid to employee safety on these sites in order to minimise workplace accidents.

KPI: number of workplace accidents.

Monitoring indicator: frequency and severity rates.

As part of its qualitative approach to professional employer/employee relationships, GROUPE ATLANTIC is investing in **QUALITY OF LIFE AT WORK**. The areas for reflection and consideration are: well-being, work-life balance and freedom of expression, all with a view to continuously improving the everyday professional lives of its employees.

Monitoring indicators: internal survey results and rate of absenteeism.



BUSINESS ETHICS: Anti-corruption and personal data protection charter Given its international scale and presence throughout the world, GROUPE ATLANTIC has established an anti-corruption charter, which is applied in addition to the various anti-corruption laws. The digital management of relationships with suppliers and customers also means investing in personal data protection to ensure compliance with the European Union's General Data Protection Regulation (GDPR).

GROUPE ATLANTIC PURCHASING POLICY:

In order to maintain best practices and to ensure compliance with regulations on sourcing from suppliers, GROUPE ATLANTIC has recognised that the Group purchasing policy should have a framework and be shared by all of the Group's Purchasing Departments.

STAKEHOLDERS RELATIONSHIPS:

GROUPE ATLANTIC offers products that have a genuine impact on people's day-to-day lives (products relating to thermal comfort). As such, the Group wishes to build a relationship with its own customers, who are procurement consultants on its products, while also helping to improve people's living conditions through various sponsorship initiatives.

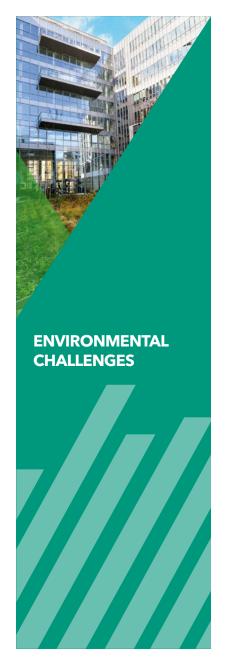
- Partnerships and sponsorship (endowment funds, UK initiatives, etc.);
- Training for the industry (its customers).

Monitoring indicator: Number of customer training sessions.

CREATION AND RETENTION OF POSITIONS:

The Group is continuously creating jobs, fulfilling one of the key societal roles that companies play. In 11 years, the total number of GROUPE ATLANTIC employees has more than doubled, from 4,200 in 2010 to 11,600 in 2021.

Monitoring indicator: annual change in the total number of GROUPE ATLANTIC employees (France and abroad).



CONTROLLING THE ENVIRONMENTAL IMPACT OF INDUSTRIAL AND COMMERCIAL SITES:

GROUPE ATLANTIC strives to preserve the environment and manage the impact generated by its activities, whether on industrial or tertiary sites. In this respect, compliance with environmental regulations regarding pollution, as well as any action limiting emissions for better management of resources and waste, represent major challenges for the Group, particularly for its industrial sites around the world.

GROUPE ATLANTIC is therefore implementing an environmental management policy based on its environmental report.

As part of its efforts to acknowledge the climate impact of its activities, GROUPE ATLANTIC conducted a carbon accounting assessment at selected major sites.

SUSTAINABLE OFFERING:

GROUPE ATLANTIC has identified significant challenges relating to the natural energy resources required to operate its products. As a result, it has invested in a multi-energy product strategy to strike the best balance between investment, efficiency, environment and comfort, all while offering consumers the choice of which energy to use.

Faced with the stakes of preserving resources and fighting climate change, GROUPE ATLANTIC is investing heavily in the development of products that use renewable energies; turnover from this activity has increased fivefold in ten years, accounting for 28% of the Group's overall business in 2021 versus 16% in 2010.

Factoring this challenge into its sustainable development policy, the Group will present this proportion of renewable energy products as one of its performance assessment criteria in the coming years.

KPI: percentage of products using RNE solutions turnover from Group total turnover



In line with environmental regulations, GROUPE ATLANTIC works towards **MINIMISING THE ENVIRONMENTAL FOOTPRINT** of its products through life cycle assessments.

KPI: number of PEP⁷ sheets and overall WEEE⁸ collection rate by the environmental organisation - ECOSYSTEM

GROUPE ATLANTIC has made a commitment to gradually and continuously reduce the climate change potential of the gases used to power the pump products that it sells (heat pumps and air conditioners).

GROUPE ATLANTIC contributes to the creation of a consortium (EMAT - France's multi-player entity for waste traceability in construction) comprising industry players in the construction sector, with the goal of establishing a national mechanism for waste traceability from building demolition and renovation sites. This process is part of GROUPE ATLANTIC's plan to become a member of an upcoming environmental organisation that arranges building waste collection and processing in order to avoid disposals at dump-sites.

^{8 -} WEEE : Waste from Electrical and Electronic Equipment

4.1 EQUAL TREATMENT

4.1.1 Accessibility policy



'Being open to all sorts of profiles is gratifying for a company; collective efficiency results from a range of experiences. It helps recruitment and it is a way for the general public to see our commitment. Within the company, it fosters a sense of belonging and pride in GROUPE ATLANTIC among its employees. Disability concerns us all.' Arnaud Rollin - HRD GROUPE ATLANTIC.

GROUPE ATLANTIC's policy promoting the inclusion of people with disabilities is based on three pillars:

Raising employee awareness and combatting

Recruiting and promoting the integration of people with disabilities, as well as ensuring job retention



In France:

- A Handi-Accueil (Accessibility) initiative was launched in 2014 at the Group's largest site in La Roche-sur-Yon, before roll-out at the Merville and Billy-Berclau sites. Since then, its Management Committee has led multiple initiatives on training, recruitment, and support for employees with disabilities.
- In autumn 2021 to increase awareness of disabilities and encourage collaborative design on the Arcueil and La Roche-sur-Yon sites. These workshops involved people with disabilities as well as 120 employees, who were able to tinker with Group products and share their observations in an effort to improve their accessibility. This work will have a tangible impact on our product plans, interfaces and connectivity systems, not to mention our approach to hiring people with disabilities.
- Held from 15-21 November, 2021, the European Week for the Employment of People with Disabilities (EWPD) staged a number of awareness campaigns:
 - Across all our sites a video broadcast featuring our Industrial General Management;
 - At our Merville and Billy-Berclau sites participation in the HANDI HAUTS LYMPICS at Amiens (northern France);

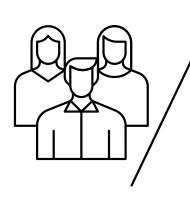
- At our La Roche-sur-Yon site (GA Synergy) participation in the Pays de la Loire region intercompany challenge, Activ'Game, created by AGEFIPH (France's association promoting the employment of people with disabilities);
- At our La Roche-sur-Yon site (Atlantic Industrie)

 hosting of a games competition in partnership with an ESAT (France's non-profit organisations facilitating employment for people with disabilities) and an inter-unit challenge to support the Ligue contre le cancer charity;
- At our Orléans and Vinay sites meetings with ESATs.
- As part of its Handi-Accueil (Accessibility) policy, and in cooperation with the Disability Confident organisation, our Group presence in the United Kingdom works to improve how the site attracts, recruits and retains disabled employees.

'Becoming a Disability Confident Employer not only helps us to reflect on how to make our workplace more accessible; it also shows our employees that we are committed to promoting equality in the workplace, which is a great way to encourage them to discuss disabilities that are often invisible.'

Debbie Skalli - HRD GROUPE ATLANTIC UK & ROI.

NUMBER OF EMPLOYEES WITH DISABILITIES



IN 2020°, IN ITS COMPANIES IN FRANCE

116.45

FULL-TIME EQUIVALENT DISABLED WORKERS (+30 PEOPLE VS. 2019)

IN AUTRIA, AUSTRIA EMAIL EMPLOYS

21 PEOPLE WITH
DISABILITIES, REPRESENTING A
DISABILITY LEVEL EQUAL TO 50%.

4.1.2 Gender equality



GROUPE ATLANTIC's policy is supported by legal compliance requirements to guarantee that no form of discrimination exists within the company. The Group's challenge is to achieve true gender equality at work, particularly by combatting everyday workplace sexism and ensuring equal pay for equal work, gender parity in management and diversity within the business fields. In 2021, women accounted for 33% of the GROUPE ATLANTIC workforce in France¹⁰. This is higher than the national average published by the National Institute of Statistics and Economic Studies (Institut national de la statistique et des études économiques [INSEE]) for the manufacturing industry (28%). Throughout the Group, women make up 25%11 of the workforce. As part of its agreements regarding professional equality in France, and in accordance with its fundamental principles, GROUPE ATLANTIC aspires to foster equality in the professional world, day in day out. In other countries where the Group operates, local initiatives exist to champion access to technical business fields for women and to break down barriers and prejudice.

The Hull site in the United Kingdom participated in the WIME (Women into Manufacturing and Engineering) event to present and promote job opportunities in the manufacturing and engineering industries to women in the region.

In the Netherlands, initiatives to promote diversity and equal opportunities resulted in a substantial increase in the proportion of company women staff, up from 16% in 2020 to 22% by end-2021.

In Austria, Austria Email took part in an **initiative known as "Girls Day"**. Its purpose: to encourage students - and particularly women students - from secondary schools to pursue careers in the STEM (Science, Technology, Engineering, and Maths) and crafts fields. Over the last two years, the event could only be organised remotely, owing to the COVID-19 pandemic. In 2022, students will once again be able to attend live open days as well as full weeks in company premises.

In Poland, employees of Atlantic Polska now sign a contract notifying them of the following: a policy on equal treatment of staff and a ban on discrimination and preferential treatment in the workplace. In particular, the latter refers to sex, age, disability, race, religion, nationality, political opinions, trade union membership, ethnic origins, beliefs, and sexual orientation.

⁹ - Given the period of data availability, we are unable to provide information for the 2021 financial year.

^{10 -} Excluding Cotherm

¹¹⁻ Excluding Cotherm, Pôle UK, SAWHA, Groupe Atlantic Teplolux, Thermic Energy, Hautec, I-Warm, Gruppa Teplolux, Teplolux BLR, Teplolux Kazakhstan

Gender equality index¹²

This index only applies to GROUPE ATLANTIC's French companies. In 2021, GROUPE ATLANTIC companies obtained the following scores:

ACTA Industrie (Meyzieu): 87/100ACTA Commerce (Meyzieu): 67/100

/ Atlantic Industrie (La Roche-sur-Yon): 88/100

✓ GA Synergy (La Roche-sur-Yon): 84/100

✓ SCGA (Bourg-la-Reine): 77/100

SIC (Merville and Billy-Berclau): 72/100
 CICE (Saint-Louis and Fontaine): 84/100
 Thermor (Saint-Jean-de-la-Ruelle): 65/100
 Guillot Industrie (Pont-de-Vaux): 85/100

CESC (Meyzieu): 72/100COTHERM (Vinay): 91/100

The 2021 index for Ygnis Industrie cannot be calculated.

INDICATORS	ACTA Industrie	ACTA Commerce	ATLANTIC Industrie	GA SYNERGY	SCGA	CICE	SIC	THERMOR
1 - Salary gap (40 points)	39	37	38	39	37	34	37	35
2 - Individual salary increase gap (20 points)	20	0	20	10	10	20	0	5
3 - Promotion gaps, in % points (15 points)	15	15	15	15	15	15	15	15
4 - Percentage of salary increases on return from maternity leave (15 points)	incalculable	15	15	15	15	15	15	incalculable
5 - Number of employees from the under-represented sex in the ten highest-paid positions (10 points)	0	0	0	5	0	0	0	0
TOTAL OUT OF 100	87	67	88	84	77	84	67	65

Breakdown of points obtained by criteria - Companies with 50 to 250 employees.

INDICATORS	GUILLOT	CESC	YGNIS	COTHERM
1 - Salary gap (40 points)	37	17	incalculable	37
2 - Individual salary increase gap in % points (20 points)	35	35	35	35
3 - Promotion gaps, in % points (15 points)	35	35	35	35
4 - Percentage of salary increases on return from maternity leave (15 points)	incalculable	15	incalculable	incalculable
5 - Number of employees from the under-represented sex in the ten highest-paid positions (10 points)	0	5	0	5
TOTAL OUT OF 100	85	72	incalculable	91

12 - The index out of 100 points is calculated using the five indicators approved by the French government.

These five indicators and their respective weightings are as follows:

• salary gap (40%);

• gap in awarding salary increases (20%);

• gap in awarding promotions (15%);

• percentage of employees with salary increases on return from maternity leave (15%);

• number of women and men in the ten highest-paid positions (10%).

4.2 TALENT RECRUITMENT AND RETENTION

4.2.1 Relationships with schools



In order to support its development, the Group aims to increase its appeal to students. This will make it easier to recruit interns and work-study participants (sourcing) and, in the long term, to develop partnerships and the employer brand in order to favour future recruitment.

In the United Kingdom, the UK Division recruited 17 new apprentices for its Engineering, Marketing and Digital Departments over the course of 2021. They will complete four years of theoretical and handson training at one of our sites and in a classroom. We are also a major partner of Ron Dearing UTC, which offers a unique approach to education for 14 to 18-year-olds (Supervised apprenticeship with an employer specialising in engineering, creation and digital technology). Another of our partnerships is with St Mary's College, where we form part of their network of company advisors.

In our efforts to promote learning, we supported student placements in local universities providing a year of industry experience.

We are backed by a number of internal ambassadors who are volunteers from a range of science, technology, engineering and maths backgrounds. Together, they inspire the next generation of professionals in these disciplines.

In France, a variety of initiatives are implemented each year:

Partnership events involving 20 schools: 6 student visits to our plants, 2 supervised projects, 20 forums and trade shows (13 virtual), 15 meetings with school Professional Connections Departments, 9 student conferences on GROUPE ATLANTIC businesses, 5 job interview simulation workshops, and 2 CV workshops.

- / Financial support to 51 schools, via France's vocational training tax ("taxe d'apprentissage"), contributing a total of €139,500 in 2021.
- Initiative for choosing the future interns of the Group's various sites. This day offers the students selected a practical opportunity to learn about our business fields and available internships (testimonials from former interns, meetings with managers) and provides creative workshops for designing the products of the future. The course was also tested out to recruit work-study participants through the '1 day/1 work-study programme' with full-scale roll-out scheduled for 2022.
- Our Young Graduates programme welcomes 40 young engineering graduates at various Group sites (France and abroad) each year, creating a talent pool that can evolve within the Group. This threeyear scheme gives these recent graduates a chance to become part of the Group and reap the benefits of a special support programme.
- 'Business field ambassador' employees act as the link between managers and students from the Group's partner schools, to lead meetings (firsthand accounts and school forum participation) and projects.
- Sponsorship initiatives help to strengthen partnerships with schools and raise the profile of Atlantic among students. For the past three years, GROUPE ATLANTIC has sponsored a 100% student sailing crew participating in France's national "Tour de voile" race. In 2021, our sponsored team won the cup.
- 2021 also saw the Group boost its engagement with its student communities: 10 job search workshops in partnership with APEC (France's Agency for the employment of Executives and Managers), 2 LinkedIn workshops, sponsorship of a new intern or work-study participant by an intern or work-study participant from the same site, 2 virtual Trainee Days to encourage meetings between our interns and work-study participants, and a virtual forum to connect 30 recently-trained young people to talentseeking GROUPE ATLANTIC managers.

- ✓ In 2021, the Group won the 'ChooseMyCompany. com' award for the 6th time for management excellence and the high motivation of interns and work-study participants. The overall grade was 4.28/5 with a recommendation rate of 97.1%.
- In Austria, Austria Email worked closely with the Graz University of Applied Sciences on apprenticeship contracts. To date, 10 apprentices are receiving training. Half of them are women. Virtual meetings are also organised with schools in the region to present the company and positions available to both students and their parents.

4.2.2 Apprenticeships

Number of work-study participants in France in 2021¹³: 210

(92 work-study participants recruited in 2021)

- In Georgia, the Kutaisi site has joined forces with two universities - Kutaisi State Polytechnic University and Tbilisi Free University - for the last three years. Both of these partnerships have provided opportunities for multiple meet-ups with students, visits to plants and development projects
- In Spain, GROUPE ATLANTIC ESPANA partners with two Barcelona-based universities. Thanks to these partnerships, in 2021, we recruited three interns in Marketing, Pre-Sales and Human Resources positions.
- In Russia, the Group forged a partnership with Mytishchi college (Колледжмытищинскиймашинос троительный) and the Finance Technology Academy in Korolyov. 2021 saw the Group subsidiary welcome 12 interns and three apprentices.
- In Turkey, the Izmir site signed an agreement with the university Dokuz Eylül Universitesi (Mechanical Department) and another with İzmir Yüksek Teknoloji Univercity.
- ERENSAN works jointly with Istanbul Technical University organising meetings with students.

4.2.3 Diversity

As part of its recruitment policy, GROUPE ATLANTIC focuses on integrating people from diverse backgrounds and promoting awareness of the Group's businesses and expertise by building on its local roots and engaging its employees.

A partnership with *Nos Quartiers ont du Talent* [Our Neighbourhoods Got Talent] (NQT) was secured for the Group (within France). This makes it possible to:

- offer employees the opportunity to mentor a young person;
- organise local events to introduce people to the Group's business fields;
- and connect disadvantaged young people with recruitment managers within the Group.

The circumstances surrounding the 2021 health crisis did not allow for this partnership to come to life through action, but it was renewed for an additional year.

4.2.4 Employer Brand

The primary focuses of GROUPE ATLANTIC'S HR policy are both internal - developing employee pride



in belonging to the company - and external - enhancing the Group's reputation to attract new talent.

To expand our audience in the world of social media, 2020 saw us take several new steps:

- Creating a network of contacts for all Group entities to share news of life on-site. These events are then posted for our entire community, who can broadcast them more widely.
- Setting up a committee of moderators to respond to comments made on company review websites.
- Launching an ambassador programme intended to transform our employees into GROUPE ATLANTIC representatives on social media. In 2021, the number of followers on our LinkedIn, Facebook and Twitter pages increased by 40%, 140% and 6.5% respectively, compared with 2020. In 2021, for the 13th time, the Group was named Top Employer in France.

4.2.5 Internal training and skills development

HR policy aims to develop the skills of each individual in order to enhance efficiency and leverage expertise. The goal, as with Group customers, is to develop a lasting relationship with its employees, providing them with support throughout their professional careers.

In 2021, GROUPE ATLANTIC considerably stepped up its **training packages**, factoring in Group-wide challenges, topical subjects and identified employee needs. New training courses were developed on subjects that included change management, psychosocial risks, stress and remote working management, feedback culture, constructive communication, indirect purchasing and emotional intelligence. Since 2020, the Group has rolled out WeGA - Ways to Excellence at GROUPE ATLANTIC - as well as its **WeGA Academy**. With this in mind, in 2021, the Group coordinated 22 combined training courses for industrial site employees in France and abroad, with a focus on topics such as problem solving and project product method.

The WeGA Academy courses enable employees to develop their operational skills based on the seven WeGA pillars, namely: Safety; New Product Introduction (NPI); People Development; Quality; Supply Chain & Purchasing; Production System; and Economic Performance.

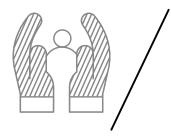
Moreover, the Group is committed to providing a more comprehensive package across its **international** sites. Employees around the world can already access some training courses in English. These include: the Management Development programme (equivalent to the 'Pépinière Managers' course) for young managers, the Expertise programme for Group experts, and the Boostcamp programme for directors. In addition, some internal courses are already supported in English (particularly HR training).

The 'Leadership & Transition' and 'From Leader to Mentor' courses are also available in English. Skills development is becoming a global priority with all training courses now deployed worldwide including those focused on indirect purchasing and feedback culture.

Lastly, 2021 marked an acceleration in the **digitisation** of Group training packages. To that end, we increasingly develop e-learning modules via our 'Campus GROUPE ATLANTIC' platform. This takes the form of either independent training modules or follow-up courses to in-person training to further development.

Encouraged by the health crisis, we also arranged remote training sessions (or virtual classes) mainly via Microsoft Teams, by adapting the materials, coordination techniques and training periods. By developing digital training packages, the Group is able to expand its reach among employees. This particularly applies to the Group's international development, the roll-out of WeGA and the ongoing health crisis.

INTERNAL TRAINING

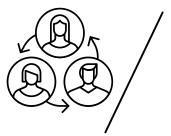


IN 2021, DESPITE THE COMPLEX HEALTH CRISIS, GROUPE ATLANTIC INVESTED

3.43%

OF ITS PAYROLL IN PROFESSIONAL TRAINING AND SKILLS DEVELOPMENT.

INTERNAL MOBILITY



35%

THE PERCENTAGE
OF JOB POSITIONS
(EXCLUDING WORKER
POSITIONS) FILLED
INTERNALLY IN FRANCE¹⁴

KPI: 6% overall staff turnover rate in France for 2021

4.3 HEALTH & SAFETY AND WORKING CONDITIONS

2021 was characterised by the COVID-19 pandemic and its various waves. Throughout the pandemic, **the Safety Club**, which brought together Safety Managers from all sites, met on a fortnightly basis. Their goal was to mutually discuss their health situations and share best practices on advised protocol. To help our employees return to work in complete safety, each site has put together a **prevention guide** providing for the implementation of adequate sanitary measures (social distancing, hand washing, mask-wearing, traffic flow guidance, etc.).

GROUPE ATLANTIC believes that the health & safety and working conditions of its employees are paramount to its development. In this spirit, the Group has introduced a policy to implement all measures aimed at reducing the number of workplace accidents across its sites.

Safety is the most important of the WeGA pillars

(Ways to Excellence at GROUPE ATLANTIC). In spring 2020, the Safety Club, which brought together Safety Managers from across all industrial sites, established **ten roadmaps**:

- / Machinery risk;
- Fire risk;
- Risk relating to the involvement of external companies;
- Electric risk:
- Road risk;
- Safety culture; Chemical risk;
- Risk relating to physical activity;
- Risk working from heights;
- Risk related to workflow and traffic.

Through each roadmap, the Group has defined actions for:

- Analysing accident risk;
- Protecting people;
- Training;
- Formalising processes and ensuring compliance.

The purpose of the Safety Club is to harness a full set of best practices, making them accessible across all sites. To this end, in 2021, an assessment conducted in all the Group's industrial sites using 55 criteria scored a 96% success rate.

For 2021, the Safety Club focused on defining standard tools and shared training courses.

The full training package was introduced across all Group sites during 2021. Focus topics were as follows:

- General Safety Induction;
- Workplace first-aiders;
- Electric stackers;
- First responders;
- Cable clamps;
- External company contractors.

Parallel to this, the Safety Club, the body responsible for regular direct exchanges among the various players in charge of on-site workplace safety, publishes a monthly newsflash on workplace accidents. It also reports on key highlights and best practices.

More specifically, here are examples of initiatives across our sites which illustrate GROUPE ATLANTIC's approach:

- Daily health services: a nurse is present onsite to manage employee health needs (regular care, vaccinations, medical appointments, nurse appointments, additional testing, hearing tests, etc.) and to raise risk awareness of workplace accidents (La Roche-sur-Yon, Merville, Orléans and Saint-Louis). At the Saint-Louis site, medical examinations were performed directly on-site.
- Organisation of a Nurse Club (created in 2016): biannual meetings to promote shared experiences and best practices in the field. Establishment of a health prevention programme and harmonisation of documents and practices. The purpose of this club is for all participants to be workplace first aid trainers (La Roche-sur-Yon and Orléans sites).

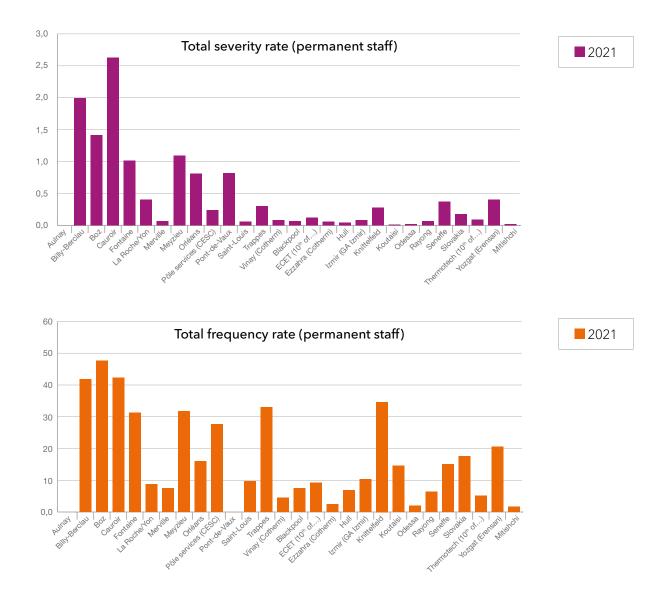
Prevention of MSD (Musculoskeletal Disorders):

- Gradual roll-out of warm-up exercise sessions before work and stretching after work (La Roche-sur-Yon and Orléans sites).
- A Posture and Motion training programme for all site employees in 2018/2019 (Orléans site).
- 60% of operators in manufacturing are trained in warm-up exercises (Cauroir site).
- Recruitment of two ergonomics specialists, one for each site in La Roche-sur-Yon and Merville-Billy-Berclau, to rate the positions and improve those with the lowest score.

Everyday health advice to employees: distribution of a bi-monthly 'CAPITAL SANTÉ' flyer with information about public health topics, such as sleep, nutrition, extreme heat and warnings about carbon monoxide poisoning (Orléans site).

Number of workplace accidents

KPI: Number of workplace accidents. In 2021, the Group's plants worldwide reported the following results: 288 people injured (vs. 237 in 2020), including permanent and temporary staff. The above number of workplace accidents was not reported at constant scope. New sites - Boz, Vinay, Ezzahra - were included to calculate this figure.



4.4 QUALITY OF LIFE AT WORK

The HR policy aims to attract and retain employees while offering them a secure and motivating professional setting, conducive to their personal fulfilment at work.

4.4.1 Improving workplace well-being

Many local steps have been taken, with each adapted to address site needs and the specific context:

- Introduction of remote working charters;
- / Concierge;
- Access to childcare services;
- Donation of annual leave time:
- On-site presence of a staff welfare assistant;
- Showers and cloakrooms for sports activities.

In May 2021, **relocation to the Arcueil site** (250 employees) contributed to improving employees' well-being in the workplace. The more modern, light-filled space not only provides better working conditions, but it also encourages innovation and discussion. The site offers an array of services including spacious dining areas, fully-equipped meeting rooms and wellness zones. This initiative was carried out in consultation with employees, with active involvement from the "Movers", a project team of 15 employees, who prepared the relocation over the previous two years.

Since September 2020, the Group's Services Division has implemented a **Quality of Life at Work metric** to evaluate the level of satisfaction of the Division's employees. In 2021, two additional metrics were disseminated to 400 employees.

These metrics consist of 24 items broken down into 6 themes:

- / Missions:
- Organisation;
- Workplace environment;
- Working relationships;
- Relationships with direct managers;
- Quality of Life at Work in general.

The Services Division earned a satisfaction rating of 85% for Quality of Life at Work, compared to 80% in 2020.

4.4.2 Employee satisfaction at work

To take on the challenges of quality of life at work, GROUPE ATLANTIC conducts assessment through a satisfaction survey of its employees, both in France and abroad.

This survey is administered by an external organisation (OBEA), ensuring the anonymity of the responses and the validity of the results obtained.

It is conducted every four years, with subsequent action plans based on results. The next satisfaction survey is scheduled for 2022, with results published in June 2022.

Examples of identified progress areas:

- Level of information within the Group supported by the in-house newsletter CLIMATIC;
- Employee motivation: roll-out of evaluation interviews and development reviews and simplified procedures linked to internal mobility;
- Streamlining of training programme management: deployment of an IT tool for increased visibility;
- Skills mapping from certain businesses to foster internal mobility.



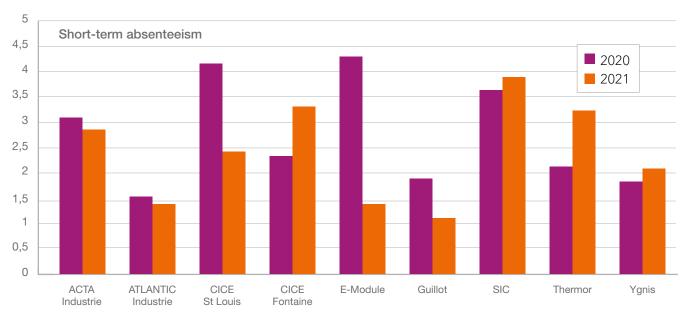
INTERNAL EMPLOYEE SATISFACTION SURVEY RESULTS



WORKER ABSENTEEISM

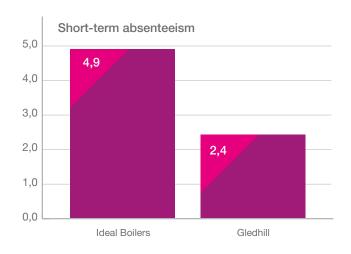
France

Number of hours of absence per 100 working hours, total over a 12-month rolling period



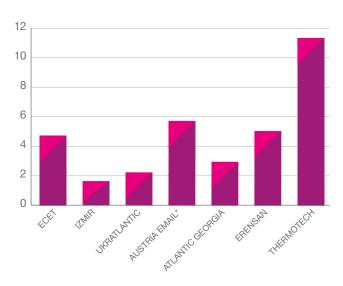
UK Division

Number of days of absence due to illness compared with the number of days worked.



International (excluding UK Division)

Number of hours of absence per 100 working hours, total over a 12-months rolling period.



4.4.3 Collaborative work

Striving for continuous improvement, GROUPE ATLANTIC seeks to involve all of its employees in its 'innovation' approach. In their own business field and position, each individual is then able to contribute to improving products, processes and customer satisfaction within the Group.

Collaborative initiatives include:

On our sites, the Autonomous teams the Progress Autonomous Units Teams (GAPs) on projects intended to improve safety, quality and productivity in the workplace.



- The role of GAP leaders is now validated by a professional qualification, the Certificate of Parity Qualification in Metallurgy (CPQM), 'Leader of Independent Manufacturing Team', recognised at a national level.
- All Innovators Policy: enables all team members on sites to suggest and develop their own innovative ideas. The concept is simple: 'All of us, as Group employees, can bring ideas to the table.' This approach became a reality in March 2021 with the launch of the POP CORN competition, the first-ever participatory innovation contest arranged throughout GROUPE ATLANTIC. Available in French (France and Belgium). The fact that 298 ideas were presented reflects the success of individual and

- collective engagement to guarantee peace of mind for our customers. 4 winning projects were selected at the final. Combined, these projects sparked the creation of prototypes in early 2022.
- Some Group sites, particularly the industrial ones, have already created FAB LABs, which are designated spaces for employees to develop prototypes and model solutions. Examples include:
- Despite the pandemic, the Group's support services at La Roche-sur-Yon continued to develop their space for sharing and exchanging best practices. This is the FAB LAB, known as: 'Le Cré'Yon'. The purpose of this space is to encourage employee creativity by providing tools and coordinating workshops, all in an environment that fosters innovation.
- The Meyzieu site started using the LAB Services to encourage ideas for new services. This included the creation of an internal application for departments as well as videos for customers.

- ✓ In the same spirit, the Izmir site, in Turkey, has developed a 52m² Fab Lab, located in a GROUPE ATLANTIC Laboratory. It is a creative hub in which all employees can coordinate, model and develop their ideas. In 2021, 92 ideas were formalised, significantly outperforming the target of 50 ideas per year.
- The 'Managers, Drivers of Group Innovation' programme helps experienced managers to build on their collaborative management expertise and interpersonal skills.

4.5 SOCIAL DIALOGUE

GROUPE ATLANTIC's policy is to sustain a constructive, regular social dialogue based on mutual trust.

To facilitate local social dialogue, the Group made it a priority to establish local representative bodies for staff.

In France¹⁵ as a result, 182 appointed team employees are in regular dialogue with the respective site management teams. In 2021, this sustained dialogue led to 186 meetings with employee representative bodies and 115 collective bargaining meetings, culminating in the signature of 25 agreements. No strike action was reported for 2021.

GROUPE ATLANTIC has also established a Group Committee. Once a year, they bring together representatives appointed by trade unions with their members elected to the social and economic committees of the French companies representing the Group. Aside from legal prerogatives of economic information, this employee representative institution is a platform for direct discussion with Group management and for sharing GROUPE ATLANTIC's growth outlook.

In its steadfast commitment towards constructive dialogue, our Ezzahra site in Tunisia introduced:

- A monthly works council with six representatives.
- Bi-monthly meetings with trade unions (seven representatives).
- A workplace health and safety committee (two employee representatives), workplace physician, Safety Manager and a dedicated management team.

All social partners were engaged through sustained dialogue, tackling the various subjects which require far-reaching change.

Our Austrian team are primarily represented by two elected members. In 2021, they signed six agreements along with a few temporary arrangements.

5.1 BUSINESS ETHICS

Considering the international environment in which the Group operates, and in application of provisions governing matters on the fight against corruption and money-laundering as well as recent legislation on personal data protection, the company has undertaken a number of approaches to apply the relevant principles. Combatting corruption and protecting personal data will be discussed in this section.

5.1.1 Anti-corruption charter

Adoption of the Group's anti-corruption charter in France and abroad. The aim of this Charter is to acquaint employees with situations that could be considered as corruption, reminding them of necessary behaviour in such scenarios. This Charter applies to all Group managers and employees.

5.1.2 Personal data protection

Since the EU General Data Protection Regulation (GDPR) took effect, GROUPE ATLANTIC has enjoyed a reasonably complete overview of the personal data used within its



services and subsidiaries alike. Internal awareness is progressing in accordance with information updates, and two charters have been drafted and rolled out:

- General policy on data protection, which concerns customers, and is published on the Group's websites;
- Group employee policy, rolled out across all our sites.
- Marketing and Project teams complete personal data protection awareness sessions with a view to practising the GDPR in their day-to-day business.

The Group has added a Data Protection Officer (DPO) to its IT team.

5.1.3 Cybersecurity

In celebration of the European Cybersecurity Month (October 2021), GROUPE ATLANTIC turned its attention to bolstering best practices on information system and cyberattack risks. With this aim, the Group initiated a challenge in French and English to digitally

connected employees.

Four cybersecurity best practices were shared on a weekly basis with employees encouraged to sit a knowledge recap quiz. The additional purpose was for staff to learn how to protect their personal data online. The challenge, which attracted almost 800 employees, ended with a webinar in early November. This was moderated by our Cybersecurity team.

The Cybersecurity team has also kicked off awareness workshops for the Group Manager community to factor this risk into their activities and projects.

Aware of the need for high vigilance, our Cybersecurity team performs intrusion tests and phishing campaigns in a drive to train our employees and elevate the general level of IT security.

5.2 PURCHASING POLICY



The Group initiated a responsible Group purchasing policy several years ago. The main lines of this policy are based on the following:

- Involvement of the Purchasing Department: supplier risk management, compliance with regulatory requirements and innovation;
- Demanding referencing process for all component and raw material suppliers in and outside Europe (regular visits during approval phases). Buyers are mindful of the working and production conditions relating to the environment observed on-site at each inspection, as these could lead to the supplier being delisted if contract terms are not respected.

- Inclusion of working condition clauses in purchasing contracts and compliance with current regulations;
- Research and Innovation with supplier partners: development of projects for innovative products in partnership with suppliers;
- Purchasing best practices: rules and recommendations for operational and decisionmaking methods imposed on all Group buyers. Corporate social responsibility themes are considered in the best practices guide (ethics, working conditions, environment, respect for suppliers, etc.)

Safety audits are performed at our main suppliers using an assessment grid. However, this process was stalled because of the global pandemic since 2020 (supply activities and travel difficulties).

5.3 STAKEHOLDER RELATIONSHIPS

5.3.1 Sponsorship and partnerships

GROUPE ATLANTIC seeks involvement in social life, whether through sponsorship or partnerships. Such involvement is organised into two areas:

- Contributions as part of the Group's endowment fund or through local initiatives in the region;
- Involvement in Research and Development programmes, as well as in the implementation of sustainable development projects.



Atlantic Société Française de Développement Thermique created an endowment fund to combat energy insecurity as a result, starting in 2019. This Group endowment fund supports projects that fight energy insecurity with three priorities:

- Assisting with social integration through access to housing;
- Helping to reduce energy consumption and greenhouse gas (GHG) emissions;
- Aiding professional integration through support, education and training in climate control engineering. The Group's endowment fund uses the name 'Share the warmth' in its communications with third parties and partners.

Its main actions for 2021 were completed through in-kind donations. GROUPE ATLANTIC's endowment fund provides practical solutions to real-life problems such as no house heating. In doing so, the Group supplies those in need with adapted heating and sanitary hot water.

Throughout 2021, 'Share the warmth' stepped up its Habitat et Humanisme partnership with support for multiple initiatives:

- Supply of products for the residences administered by Habitat & Humanisme in Saint Mandé, Saint Georges d'Oléron and Lyon, including the donation of more than 170 radiators to replace energy-intensive appliances in the Lyon residence.
- Participation in the "I'Heure Solidaire" event. During this event organised by Habitat et Humanisme, the aim is to devote one hour to the association when the clocks change in October. The purpose is to discuss the charity, collect donations and appeal to volunteers. This year, the Group's endowment fund backed the event by organising a fun run within GROUPE ATLANTIC. Our employees completed more than 3,000 km (1,864 miles), donating a total of €3,000 to Habitat et Humanisme.

What's more, 'Share the warmth' furthered its collaboration with Compagnons Bâtisseurs, notably through product donations to their SOLIBAT platform in the city of Tours (central-western France).

On top of that, the Group's endowment fund has leant its support to new associations, such as Toit à moi, Agence du don en nature, Lazare and Habit'âge. The projects spearheaded by the above associations and charities uphold the same values and purpose as the Group and its endowment fund.

Overall, in 2021, 'Share the warmth' endorsed a number of projects to combat energy insecurity with donations totalling €108,000 at year-end.

In addition, the Group participated in the following local actions:

- MACMILLAN Cancer Support is the UK&ROI Division's official charity fund: the three industrial sites and the six brands have organised several fundraising events involving the largest number of colleagues, family members and friends. Such functions involved pedestrian activities, fun runs, football championships and many more endeavours.
- Participation and sponsorship of the Coupe de France Robotique 2021 held in La Roche-sur-Yon at the start of July.
 - As part of the second line of its policy, the Group has taken or is taking part in the following projects:
- Participation in Research and Development groups: The S₂E₂ competitiveness division focuses on smart electricity technologies, supporting energy management in the Centre-Val de Loire, Pays de la Loire and Nouvelle-Aquitaine regions in France. The S2E2 division's head offices are in Tours, with additional premises in Orléans and La Roche-sur-Yon.

5.3.2 Training for the industry

The Group places great importance in the products designed, manufactured and marketed being practicable for customer use; in other words, they are able to recommend, distribute and install them. In this context, with the help of its training centres, the Group offers courses and programmes to installers and partners.

To date, the Group has 8 training centres internationally and 10 training centres throughout France. A new training centre was unveiled at our Aulnay-sous-Bois

site in September 2021. As the first campus dedicated to the commercial and tertiary sectors, the site opened to fulfil the Group's ambitions for further development in this market.



Training is specially geared towards:

- Technical training modules for installation, assembly, start-up, optimisation, maintenance and repair of all its products and systems.
- Training modules to help customers with selling techniques for the general public.
- Regulatory and certification training: QUALIPAC (heat pumps and heat pump water heater modules), QUALIBOIS, refrigerant fluid handling, electrical certification, brazing, regulations, Energy-related Products (ErP), France's Recognised Environmental Guarantor (RGE) certification (QualiPac, QualiPac heat pump water heater (CET) module and QualiBois).

RGE

Campus Atlantic: an online training platform designed to provide training programmes catering to new needs.

In addition to these internal training programmes, to improve knowledge of their products and regulations for different types of visits, the Group offers:

Customer visits to the Group's industrial sites;

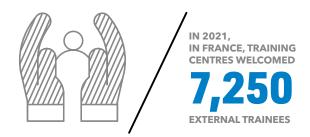
- Site visits hosted by Group teams and discussions with installers;
- Customer visits to the Group's Research Centre for Thermal Comfort (Centre de Recherche pour le Confort Thermique [CRCT]).

The Group also offers tools to facilitate its product sales for installers. These include:

- Platform for Internet support, tablet application, spare parts service, product sizing assistance;
- Educational packaging with rules and best practices for assembly and advice on selecting and installing equipment (individual ventilation).



NUMBER OF CUSTOMER TRAINING SESSIONS



Over 2021, in France, training centres welcomed 7,250 external trainees (+54% vs. 2020). For future financial years, this data will be incorporated into a Key Performance Indicator referred to as 'KPI - number of external trainees'.

Against this background, GROUPE ATLANTIC decided to invest in its training policy by rolling out a customised training plan for its customer - TEREVA. It follows the skills assessment of 700 employees and the ramp-up of virtual classes, webinars and live sessions, for the Group's internal and external customers.

6.1 GROUPE ATLANTIC'S ENVIRONMENTAL DECLARATION

Under its environmental policy, the Group undertakes to:

- 1/ Conduct constant research to further its product offering in terms of comfort, safety and energy performance with a specific focus on solutions using renewable energies.
- Innovate by combining the various types of energies to minimise greenhouse gas (GHG) emissions and energy consumption.
- Anticipate regulations concerning the thermal performance of buildings.
- Refrain from using hazardous substances in appliances.
- Constantly research ways to improve product performance in real-life environments in its Research Centre for Thermal Comfort and in its laboratories.

2/ Reduce energy consumption and GHGs produced by Group business activities.

- Conduct environmental diagnoses and carbon accounting analyses on the Group's industrial sites. At end-2021, the Group decided to perform carbon accounting analyses at 18 of its industrial and commercial sites located abroad and in France.
- Minimise energy consumption generated by production processes.

3/ Protect water resources by reducing water consumption and improving discharge quality.

- Continuously aim to promote production techniques that lower water consumption.
- Optimise the quality of production-related wastewater.

4/ Control waste generated by Group business activities.

- Sort and recover production waste for each type of material.
- The ECOSYSTEM environmental organisation in mainland France collects and recovers end-of-life Waste Electrical and Electronic Equipment (WEEE).

5/ Increase the use of recyclable packaging.

- Consider environmental impacts of material and design when selecting packaging.
- 6/ Provide customers and expert partners with advice and training, in particular to promote environmental safety when installing and using Group equipment.
- Deploy the Group's product training solution (advice, installation and maintenance) provided in its training centres throughout mainland France.
- Provide installers and users with documentation that is suited to their needs by favouring the use of electronic formats.

7/ A supplier mapping and risk assessment process will kick off in 2022 to drive progress within the Purchasing Department.

- Deploy a Group purchasing policy built around sustainable development criteria.
- Include environmental and social clauses in supplier purchase agreements.
- Include environmental and social criteria in the supplier audit framework.

6.2 CONTROLLING THE ENVIRONMENTAL IMPACT OF INDUSTRIAL SITES

As an industrial entity, the Group has plants of various sizes with varying impacts on the ecosystem and the economic fabric of the areas where they operate, particularly depending on geographical location. Having identified the environmental aspects linked to its industrial activity as a major issue, the Group has adopted an environmental management approach.

6.2.1 Environmental management system

GROUPE ATLANTIC is committed to environmental protection, adopting a high-quality approach across all of its industrial sites. The Group applies the ISO 14001 standard. Each of the Group's sites decides on certification and self-reporting. Group industrial sites comply with regulations set by the countries in which they are located. In France, 10 out of 13 sites are regulated by the Classified Installation for Environmental Protection scheme and are registered or authorised to operate by the local authorities in the relevant department. The Arcueil and Billy-Berclau sites have obtained several certifications which validate building environmental performance, including "HQE16", "BREEAM17" and "Effinergie+". Sites are also given support for regulatory monitoring and compliance by an environmental coordinator with a transversal approach throughout the Group.

Below are the initiatives underway across the environmental network:



- Environment Club: its purpose is to bring together Environment Managers⁽¹⁵⁾ from industrial sites on a regular basis, to improve Group operations and discuss ongoing projects at each site. The goal is to apply the approach to sites outside of France from June 2022.
- Environmental analyses of industrial sites, which started in 2018, have been disrupted by the health crisis since 2020.

All sites employ management staff to properly address environment issues: regulatory monitoring, initial environmental reviews, targets, and action plans. They may take action on the following topics in particular:

- Sustainable use of resources;
- / Pollution and waste management.

Furthermore, since 2020, the Group has coordinated awareness workshops at specific sites on the Climate Fresk, a collaborative tool on the causes and effects of global warming. These efforts are expected to be stepped up in 2022, with training for internal coordinators and wider scale roll-out across sites.

6.2.2 Sustainable use of resources



Examples of initiatives include:

- Monitoring energy and water consumption: multiyear monitoring and analysis performed at most sites with definite action plans regarding major consumption areas.
- Sites strive to use a closed-circuit water system for Group processes to limit consumption.

- In October 2021, a tender was issued across the Group's main sites to conduct carbon accounting. A decision was made to conduct carbon accounting at 18 sites (industrial, commercial and logistics platforms) from February to October 2022. Results will be extrapolated to develop an initial approach for consolidated carbon accounting throughout the Group.
- Modernisation policies for production lines incorporating energy savings, environmental protection and product eco-design constraints.
- Gradual replacement of the petrol engines in our handling forklifts with electric engines.
- **6.2.3 Pollution and waste management**

Examples of actions taken include:

- Noise measurements and monitoring of water and air pollution: identifying areas for improvement to reduce environmental impacts and improve working conditions;
- Waste management: establishing on-site procedures, which at the very least, include the sorting of hazardous and non-hazardous waste. For most of these sites, sorting waste at the source is ensured through computerised monitoring of traceability (volume, business, waste collecting company, etc.). In 2021, the Fontaine site made significant progress in waste management and reduction. The site reduced its NHIW¹⁸ production by 18.8% versus 2020. Commenting on progress, Mathieu Simet, the

Photo credit: ecosystem, François Daburon

- site's HSE Manager, said: 'We have reduced the cost of processing our NHIW, cardboard and wood by a factor of three, and the number of waste trucks on the road by a factor of four'.
- Business travel is being reduced as a result of the rollout of specific architecture for videoconferencing.
- Jet A "maintenance de votre vélo" ("maintain your bicycle") day was organised at our Arcueil campus to promote cycling for commuting. The site paid for refitting services and the supply of brake pads and blocks where required, provided for all permanent employees. A €250 bonus for electric bicycle purchases was also offered from 1 September 2021 to 31 March 2022.

6.3 CONTROLLING THE CARBON FOOTPRINT OF THE GROUP'S INDUSTRIAL AND COMMERCIAL SITES

At end-2021, GROUPE ATLANTIC issued a tender for assistance by an outside firm in conducting carbon accounting at 18 sites in France and abroad. This included the most strategic industrial sites.

Assessments will be conducted between February and October 2022. For full coverage of emission sources, the review will include the three scopes under the carbon accounting method of ADEME (French Agency for the Ecological Transition), spanning the Group's

operated and non-operated activities

In doing so, the Group strives to:

- / Identify the main sources of emissions, prioritise them and create a baseline;
- Determine decarbonation levers and develop site-specific and Group-wide action plans;
- Set targets to reduce emissions

18 - NHIW = Non-hazardous industrial waste.

6.4 SUSTAINABLE OFFERING

GROUPE ATLANTIC has implemented an ambitious development plan for decarbonised solutions. The latter are based on the laws of thermodynamics (RNE), accounting for 28% of Group turnover in 2021 (vs. 16% in 2010).

6.4.1 Compliance with regulations

The Group guarantees the stringent compliance of its products with environmental regulations through its various departments (regulatory monitoring community, CSR Department, Marketing Departments). Against this backdrop, since 2021, Group services have prepared the application of provisions for France's AGEC law (against waste for a circular economy). This law provides for the following: communication of product environmental qualities and specifications of products sold to the consumer, enforcement of instructions for sorting products based on Extended Producer Responsibility (EPR) and intended for consumers, strategy to eliminate single-use plastics.

GROUPE ATLANTIC is authorised to import products filled with a refrigerant fluid into the European Union (EU), in accordance with the F-gaz regulation requirements, and declares the quantities of greenhouse gases (HFCs) placed on the market with both the European and French authorities (ADEME).

- The Group Purchasing Department has instructed an external organisation - EcoMundo - to systematically confer with all suppliers regarding REACH, RoHS and nanoparticle regulations. The consultation campaign aims to ensure compliance and identify items that may contain hazardous substances for consumers. EcoMundo's Group reporting has identified that slightly more than 10% of products contain SVHC¹⁹.
- KPI: number of sites covered per year through EcoMundo consultation. The Group has extended the scope of this campaign since July 2021 with 21 industrial sites now covered compared with four in 2020. Some of the 21 industrial sites did not receive feedback from EcoMundo since they were included in the campaign as of July and are still conducting assessments.

6.4.2 Environmental product approach

Markets, equipment and regulations encourage manufacturers to offer more environmentally friendly products. To meet these standards, GROUPE ATLANTIC structures its Environmental product approach into environmental declarations, with two priorities:

- Better understand the environmental impacts of Group products;
- Design new and more sustainable products. At present, the Group has prepared and developed environmental declarations on the approach to product life cycle assessments. These declarations are made in compliance with the Product Environmental Profile (PEP) ecopassport® programme, supported by the Group as a member since 2011. This approach can be broken down as follows:

KPI : PEP ecopassport® sheets:

- Relevant products: priority given to product ranges for the new build market.
- Identification of Group product environmental impacts during the five stages of their life cycle: manufacturing, distribution, installation, use, end-of-life (compliance with ISO 14025:2010, ISO 14040:2006 and ISO 14044:2006 standards).
- Use of EIME (Environmental Improvement Made Easy) software, Life Cycle Assessment (LCA) and ecodesign (developed by Bureau Veritas CODDE - a centre of excellence in eco-design and sustainable product development). Training four experts to use this software.
- Identical drafting process for PEP ecopassport® sheets at all Group production centres in France.
- Extended collaboration with our foreign production sites and suppliers in the drafting of PEP sheets.

^{19 -} SVHC=Substance of Very High Concern

/ KPI: number of environmental declarations:

During 2021, the Group registered 33 valid PEPs on the PEP ecopassport® database: https://register.pep-ecopassport.org//. 21 of these can be accessed through the INIES database (the baseline database for the application of France's RE 2020 environmental legislation).

Moreover, GROUPE ATLANTIC contributed to 8 collective PEPs developed by the UNICLIMA Trade Union for the heating, ventilation and cooling industries. The Group has four FDES (French Environmental and Health Declaration sheets) accessible from the INIES database.

The number of PEPs decreased in 2020, owing to:

- a number of PEPs expiring on the one hand;
- and on the other, the Group postponed its approach pending new regulations governing the development of PEPs published at end-2021.

This new regulation impacts the approach of the Group, which must now adapt its tools and train its experts. That said, GROUPE ATLANTIC remains one of the leaders in developing PEPs for the HVAC industry. For 2022, the Group targets the development of 60 PEPs with a focus on core solutions for new builds. Longer term, new PEPs will be developed for products dedicated to the renovation market.

- To take the environmental approach to products even further, constant research is conducted to reduce their impact. Below are the key points of the eco-design approach:
- Products evolve but any environmental impact generated during the various phases of their life cycle is reduced. New products are affected by the roll-out of eco-design across Research and Development Departments.
- Assessment of Group product recyclability rates via a calculation tool made available by the environmental organisation ECOSYSTEM.
- Gradual replacement of refrigerant fluids with the strongest impact on global warming. Examples include:
- Heat pump and air conditioning ranges (except VRF): switch to R32 (GWP of 675) from R410A (GWP of 2,100).

Between 2020 and 2021, the amount of greenhouse gases (HFCs expressed in tonnes of equivalent CO_2) imported into the European market by GROUPE ATLANTIC increased by 30%. This increase results from market trends in France regarding air-to-water heat pumps and heat pump water heaters. Sales rose sharply, up 52% in air-to-water heat pumps compared with last year and 36.5% growth for heat pump water heaters. The increase in HFC imports is due to GROUPE ATLANTIC's leader position in its markets.

Other internal tools are being developed in the search for improved environmental performance from Group products: GROUPE ATLANTIC laboratories:

GROUPE ATLANTIC has made considerable investments to develop a robust network of laboratories on its industrial sites, with testing methods and shared standards. To date, the Group owns 22 laboratories (11 in France and 11 abroad). These laboratories act as a tool for optimising Group product design.

Research Center for Thermal Comfort (CRCT):

Consisting of two twin laboratories (Castor and Pollux), this Centre is situated in Orléans (central France). Thermal comfort solutions are tested in real conditions in these two labs which are identical in all respects (same building structure, same furniture, same exposure to weather conditions). Each lab is equipped with modular systems for heating, sanitary hot water and air conditioning. The CRCT relies on tangible data to determine the best combinations for appliances in terms of energy consumption and CO₂ emissions, delivering impactful technological decisions as a result.

In 2021, the CRCT Management Team relocated to new premises at the Orléans site with a surface area of 130 m², making it possible to test tertiary solutions in real-life scenarios. Our testing plans include heating, air conditioning and air purification for small commercial spaces.

6.4.3 Extended Producer Responsibility

The waste framework directive 2008/98/EC of the European Parliament and the European Council dated 19 November 2008 reminds manufacturers of their responsibility to oversee the waste management of end-of-life products. In France, the principle of extended producer responsibility (EPR) has existed in law since 1975 and is codified in Article L. 541-10 of the French Environmental Code ("Code de l'environnement"): 'Producers, importers and distributors of these products or of components and materials involved in their manufacture may be required to provide for or contribute to the removal of generated waste.'

As part of this framework, the Group has joined environmental organisations with the aim of contributing towards end-of-life processes for equipment, its packaging and any paper medium.

✓ End-of-life for appliances:

GROUPE ATLANTIC is a founding member of ECOSYSTEM, an environmental organisation that manages the collection and processing of end-of-life electrical and electronic equipment waste in France (WEEE).

These efforts account for the estimated tonnage of WEEE household waste (appliances and lamps) collected through environmental contributions paid to ECOSYSTEM by GROUPE ATLANTIC.

In 2020, ECOSYSTEM collected and processed 1,459,074 end-of-life electrical appliances for GROUPE ATLANTIC. Products sold outside of France are handled by Group subsidiaries working directly with local environmental organisations.

/ KPI : Theoretical WEEE collection rate by the environmental organisation - ECOSYSTEM:

For France in 2020^{20} , the theoretical WEEE collection rate by comparison with the contribution of GROUPE ATLANTIC is 51.7%.

In parallel, and in an endeavour to prepare its Extended Producer Responsibility (EPR) for building waste (excluding WEEE) required by the French AGEC law (against waste for a circular economy) from 2022, GROUPE ATLANTIC committed to the creation of the EMAT consortium (France's multiplayer entity for waste traceability in construction) in 2020. This body, comprised of economic players in the construction industry, seeks to establish a national mechanism for waste traceability from building demolition and renovation sites. This is part of GROUPE ATLANTIC's plan to become a member of an upcoming environmental organisation that arranges building waste collection and processing in order to avoid disposals at dump-sites.

End-of-life for packaging:

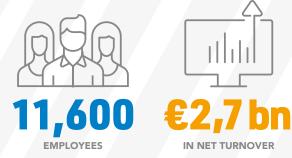
GROUPE ATLANTIC is a member of CITEO - Eco-Emballages, an environmental organisation responsible for managing France's scheme for packaging sorting and recycling.

/ End-of-life for printed paper:

GROUPE ATLANTIC is a member of CITEO - Eco-Folio, an environmental organisation that collects and recycles paper waste in France. In 2021, CITEO collected 854 tonnes of paper on behalf of GROUPE ATLANTIC, in turn producing 713 tonnes of recycled paper.



















APPLIANCES PRODUCED/YEAR







