



NON-FINANCIAL PERFORMANCE STATEMENT

2021

This document is delivered in two languages (a French version and an English version). In case of discrepancy between these two versions, the French language version shall prevail.

Table of Contents

| | | |
|-------|---|----|
| 1 | INTRODUCTORY REMARKS | 5 |
| 1.1 | CSR AND NON-FINANCIAL PERFORMANCE STATEMENT | 5 |
| 1.1.1 | Corporate Social Responsibility: "soft law" | 5 |
| 1.1.2 | The Non-Financial Performance Statement: "hard law" | 6 |
| 1.2 | NO VALUE CREATION WITHOUT VALUES: THE VALUES OF EPC GROUP | 6 |
| 1.2.1 | Operate safely | 7 |
| 1.2.2 | Create value for the customer | 7 |
| 1.2.3 | Respect the environment | 7 |
| 1.2.4 | Respect our employees | 7 |
| 1.3 | CSR AND NON-FINANCIAL PERFORMANCE GOVERNANCE AT EPC GROUP | 8 |
| 1.3.1 | Organisation and operational governance of EPC Group | 8 |
| 1.3.2 | CSR/DPEF governance at EPC Group: introductory remarks | 13 |
| 1.3.3 | Social governance at EPC Group | 14 |
| 1.3.4 | Environmental governance at EPC Group | 17 |
| 1.3.5 | Societal governance at EPC Group | 19 |
| 1.3.6 | Ethics governance at EPC Group | 22 |
| 1.3.7 | Anti-corruption governance at EPC Group | 25 |
| 1.3.8 | Human Rights Governance at EPC Group | 27 |
| 2 | BUSINESS MODEL | 29 |
| 2.1 | RESOURCES | 29 |
| 2.1.1 | Human resources: employees and skills | 29 |
| 2.1.2 | Techniques and know-how | 30 |
| 2.1.3 | Financial resources | 31 |
| 2.2 | "EXPLOSIVES" BUSINESS BUSINESS MODEL AND VALUE CHAIN | 31 |
| 2.2.1 | Suppliers and logistics upstream of the explosives business | 31 |
| 2.2.2 | Economic operations of EPC Group's explosives business | 32 |
| 2.2.3 | Customers of EPC Group's explosive business | 36 |
| 2.2.4 | Summary and graphical representation of the value chain of EPC Group's "explosives" business | 38 |
| 2.2.5 | Summary and graphical representation of the business model of EPC Group's "explosives" business | 39 |
| 2.3 | "DECONSTRUCTION" BUSINESS BUSINESS MODEL AND VALUE CHAIN | 40 |

| | | |
|--------|--|----|
| 2.3.1 | Demolition, deconstruction, asbestos removal, lead removal and recycling - the circular economy..... | 40 |
| 2.3.2 | Summary and graphical representation of the value chain of EPC Group's "Demolition" business..... | 42 |
| 2.3.3 | Summary and graphical representation of the business model of EPC Group's "Demolition" business..... | 43 |
| 3 | RISKS AND CHALLENGES..... | 44 |
| 3.1 | RISK ANALYSIS..... | 44 |
| 3.1.1 | Risks relating to the occurrence of industrial accidents | 45 |
| 3.1.2 | Risks relating to the occurrence of a pandemic | 45 |
| 3.1.3 | Risks relating to EPC Group's dependence on certain suppliers | 45 |
| 3.1.4 | Risks related to structural changes in consumption patterns | 46 |
| 3.1.5 | Risks related to joint ventures entered into by the Group | 46 |
| 3.1.6 | Risks related to an IT failure | 46 |
| 3.1.7 | Risks related to fluctuations in commodity prices..... | 46 |
| 3.1.8 | Risks relating to the availability of certain commodities | 46 |
| 3.1.9 | Political risks | 47 |
| 3.1.10 | Liquidity risks | 47 |
| 3.2 | MAPPING OF RISKS, CHALLENGES AND POLICIES BY IMPACT TYPE | 48 |
| 3.2.1 | Mapping of risks, challenges and policies for their impact on SDG 3 "good health and well-being" | 49 |
| 3.2.2 | Mapping of risks, challenges and policies for their impact on SDG 5 "gender equality" | 50 |
| 3.2.3 | Mapping of risks, challenges and policies for their impact on SDG 8 "Decent work and economic growth"..... | 51 |
| 3.2.4 | Mapping of risks, challenges and policies for their impact on SDG 9 "Industry, Innovation and Infrastructure" | 52 |
| 3.2.5 | Mapping of risks, challenges and policies for their impact on SDG 12 "responsible consumption and production" | 53 |
| 3.2.6 | Mapping of risks, challenges and policies for their impact on SDG 13 "Climate Change Measures" | 54 |
| 3.2.7 | Mapping of risks, challenges and policies for their impact on SDG 16 "Peace, Justice and Effective Institutions" | 55 |
| 3.3 | DESCRIPTION OF THE ECOSYSTEM: STAKEHOLDERS | 56 |
| 3.4 | MATERIALITY GRID | 57 |
| 3.5 | OBJECTIVES OF THE EUROPEAN GREEN TAXONOMY | 58 |
| 4 | KEY PERFORMANCE INDICATORS | 59 |
| 4.1 | SOCIAL INDICATORS | 60 |

| | | |
|-------|--|----|
| 4.2 | ENVIRONMENTAL AND SOCIETAL INDICATORS | 61 |
| 5 | 2021 HIGHLIGHTS | 67 |
| 5.1 | HIGHLIGHTS AT EPC GROUP IN 2021: CALCULATION OF GREENHOUSE GAS FOOTPRINT BY EPC FRANCE | 67 |
| 5.1.1 | EPC France's Carbon Footprint: | 67 |
| 5.1.2 | Other actions contributing to the 6 environmental objectives | 68 |
| 5.2 | HIGHLIGHTS AT EPC GROUP IN 2021: THE PROJECT TO DEMOLISH FOUR TOWER BLOCKS IN THE BALZAC DISTRICT IN SAINT BRIEUC BY OCCAMAT. | 70 |
| | Description of operations | 70 |
| 5.3 | HIGHLIGHTS AT EPC GROUP IN 2021: THE MAJOR RENOVATION PROJECT CONCERNING THE CENTRE NATIONAL DES ARTS PLASTIQUES BY ATD. | 71 |
| | Description of operations | 71 |
| | The operation in figures | 71 |
| 5.4 | SPECIFIC INDICATORS FOR 2021: | 73 |

1 INTRODUCTORY REMARKS

1.1 CSR AND NON-FINANCIAL PERFORMANCE STATEMENT

1.1.1 Corporate Social Responsibility: "soft law".

Corporate Social Responsibility¹ refers to a set of international best practices.

Although there are a number of reference frameworks, CSR is not strictly speaking a legal or regulatory obligation; this is why we refer to "soft law" when it comes to CSR.

Of all the converging definitions, we refer to the one given by the European Commission, which defines CSR as:

(...) **"the responsibility of enterprises**

for their impacts on society". *Respect for applicable legislation, and for collective agreements between social partners, is a prerequisite for meeting that responsibility. To fully meet their corporate social responsibility, enterprises should have in place a process to integrate social, environmental, ethical, human rights and consumer concerns into their business operations and core strategy in close collaboration with their stakeholders, with the aim of:*

- ❖ *maximising the creation of shared value for their owners/shareholders and for their other stakeholders and society at large;*
- ❖ *identifying, preventing and mitigating their possible adverse impacts.*²

In that same 2014 document, a list of the main pillars of a CSR policy is proposed (paragraph 3.2, ibidem):

- ❖ *the OECD Guidelines for Multinational Enterprises,*
- ❖ *the ten principles of the United Nations Global Compact,*
- ❖ *the ISO 26000 Guidance Standard on Social Responsibility,*
- ❖ *the ILO Tri-partite Declaration of Principles Concerning Multinational Enterprises and Social Policy,*
- ❖ *the United Nations Guiding Principles on Business and Human Rights.*

CSR is therefore a "soft law", which must be balanced, as mentioned above, whilst emphasising that a CSR policy necessarily involves compliance with the legal and regulatory obligations in force in each country of operation.

1.1.2 The Non-Financial Performance Statement: "hard law".

The Non-Financial Performance Statement³ is a legal obligation in France for companies or groups of companies that fall within the criteria laid down by law; this is why it is known as a "hard law".

EPC Group is subject to this non-financial performance statement obligation as it meets the criteria set out by the French Commercial Code, i.e. it is a company listed on a regulated market that prepares consolidated financial statements - the threshold of EUR 20 million for the total balance sheet, or EUR 40 million for the net amount of turnover or 500 for the average number of permanent employees employed during the financial year.⁴

The regulatory scope of the Non-Financial Performance Statement is therefore all subsidiaries subject to full consolidation, which is the case in this EPC Group Non-Financial Performance Statement.

French law sets out the expectations and formalities for a Non-Financial Performance Statement, mainly at the end of Article R. 225-105 of the French Commercial Code.

The Non-Financial Performance Statement is therefore a "hard law".

1.2 NO VALUE CREATION WITHOUT VALUES: THE VALUES OF EPC GROUP

The values driving EPC Group have been associated with the same fundamental principles since the group was founded more than 125 years ago.

Over time, even though the principles have not changed, the values have been regularly redrafted to adapt to environmental changes with the aim of always being clearly understood by external and internal stakeholders.

In 2021, at the request of its Chief Executive Officer, EPC Group's values were redrafted with this same objective of providing clarity to those at whom they are aimed.

Our employees, customers, suppliers and shareholders are among the internal and external stakeholders at whom EPC Group's values are aimed.

In addition, however, these values are aimed at all civil society, authorities and communities as well as anyone who wants to understand the values that drive EPC Group.

EPC Group has carried out this demanding redrafting exercise with them in mind.

This **2021** Non-Financial Performance Statement is the first external document in which the latest redrafting of the values of EPC Group is being presented.

From now on, each of EPC Group's four values consists of two parts: first an action phrase which defines the value, followed by a short paragraph setting out the value at EPC Group.

1.2.1 Operate safely

Operate safely

We want to ensure a safe and healthy environment for our employees, customers, subcontractors and shareholders. To do this, we need to be a benchmark in terms of safety in each of our activities

1.2.2 Create value for the customer

Create value for the customer

We know that our sustainability requires satisfied and committed customers, which is why we are doing everything we can to enable our customers to improve their productivity and the quality of their operations by guaranteeing them high-performance, high-quality products and services.

1.2.3 Respect the environment

Respect the environment

We believe that society thrives through respect for individuals, communities and the environment; that is why we always act ethically by taking social and environmental responsibility into account in our actions and decisions. We are committed to a sustainable, durable dynamic of adapting industrial tools, practices and products concerning innovation, performance and respect for the environment.

1.2.4 Respect our employees

Respect our employees

We value individual contributions and initiatives, creating an environment of trust. We also believe that major achievements are the result of teamwork. As such, we want to attract, develop and retain the best talent for our company, motivate our employees, encourage them to give their best and to be efficient and treat each person in line with the values of EPC Group.

1.3 CSR AND NON-FINANCIAL PERFORMANCE GOVERNANCE AT EPC GROUP

Note *A description of the governance bodies (Board of Directors, Audit Committee, Remuneration Committee, etc.) is provided in paragraphs 12 and 14 of the Universal Registration Document. We will focus here on the details of operational governance functions and how they are adapted to various matters covered by the Non-Financial Performance Statement.*

1.3.1 Organisation and operational governance of EPC Group

1.3.1.1 Decentralisation inherited from our past, explained by our business lines and accentuated by regulatory constraints.

The history of EPC Group largely explains its highly decentralised organisation.

Created more than 125 years ago, the Group has been established in several countries since its inception.

At that time, recent developments in telecommunications and IT did not allow for centralisation as we conceive it today.

EPC Group, which has inherited this lengthy history over an increasingly wide geographic area, has made decentralisation one of the key factors in its successful international expansion.

In addition to being a marker of EPC Group's corporate culture as well as a key to its rapid international expansion, decentralisation is also needed due to EPC Group's business lines.

EPC Group's core business is the manufacture and distribution of civil explosives for mines and quarries. The transport of explosives is complex and costly, so it is only economically viable to a certain extent, which explains the decentralisation of production unit locations and, therefore, of the associated decision-making centres.

Obviously, the production and implementation of explosives is a highly regulated activity which is closely monitored by public authorities in each country where EPC Group operates.

Even at the international and European level, regulations relating to State security and public security remain a prerogative of nation States and their local regulations. Therefore, a high level of regulatory requirements and associated administrative controls, and the absence of regional and international legal standards, have also helped to promote and legitimise decentralised governance.

1.3.1.2 Decentralisation is a result of our values as well as being the best way of putting them into practice on a daily basis.

Highly decentralised for the historical, commercial and regulatory reasons set out above (see paragraph 1.3.1.1), the organisation of EPC Group gives its subsidiaries management autonomy, which largely includes social, environmental and societal issues.

Decentralisation at EPC Group is not solely due to external reasons objectively imposed on EPC Group; it is possible to find different ways to organise similar activities and group sizes.

There is another very important reason for this decentralisation in EPC Group's culture: respect for the group's values.

As discussed above (paragraph 1.2.4), one of the four fundamental values of EPC Group is to **"Respect our employees"**. At EPC Group, this value is applied practically as follows: *"We value individual contributions and initiatives, creating an environment of trust. We also believe that major achievements are the result of teamwork. As such, we want to attract, develop and retain the best talent for our company, motivate our employees, encourage them to give their best and to be efficient and treat each person in line with the values of EPC Group. "*

EPC Group believes that in order to promote the value of respect for employees:

- ❖ the best organisation is a decentralised organisation and the best level of human resources management proximity management;
- ❖ the best management of individuals is field service management;

The teamwork of our employees enables us to take up operational challenges for the benefit of our customers.

At the level of the EPC Group, decentralisation is proof of the trust placed in the men and women who make up its subsidiaries.

Therefore, through the human management of employees, the decentralised organisation of the EPC Group aims to serve employees as well as customers.

"Create value for the customer" is another one of EPC Group's four fundamental values. As we have seen above (paragraph 1.2.2), this is applied as follows: *"We know that our sustainability requires satisfied and committed customers, which is why we are doing everything we can to enable our customers to improve their productivity and the quality of their operations by guaranteeing them high-performance, high-quality products and services. "*

EPC Group believes that the decentralised organisational model is well suited to keeping this value alive on a daily basis; in order to create value for the customer, it is essential to know them well - proximity obviously facilitates a good knowledge of their needs.

Our business lines are business lines in which product quality is only part of the high quality service. High quality implementation contributes to the high quality service provided by our products. This strong conviction at EPC Group percolates throughout its business model.

Decentralisation means proximity to customers, where they live, their business model and their operating constraints. It is an essential lever for offering the customer the most efficient and most suitable product.

Explosives and deconstruction are EPC Group's two business lines. In each of those two business lines, high quality implementation as well as high quality products and equipment contribute to the high performance service provided.

These two business lines are both exposed to high-risk products and environments.

Even though the four fundamental values of EPC Group are equally important, "**Operate Safely**" is the primary value in the sense that:

- ❖ It is primary because it comes before the others: nothing is possible without safety;
- ❖ It is primary because it extends to the others: guaranteeing safety means respecting staff, customers, stakeholders and the global environment;
- ❖ It is primary because it is a concern every second, every minute of every day;
- ❖ It is primary because it is the one that is most shared: every employee takes heed of it because it's about them, their colleagues, their family and their human, professional and general environment;
- ❖ It is primary because it is the first value presented, even though all the values are equally important: it comes first and always will!

This value is applied very simply and very clearly at EPC Group and this is what helps make implementation of this value an absolute requirement: *"We want to ensure a safe and healthy environment for our employees, customers, subcontractors and shareholders. To do this we must be a benchmark in terms of safety in each of our activities"*.

A decentralised organisation served by a common culture is a way of bringing employees, customers and our local environment as close as possible to the resources, skills and mechanisms necessary to ensure a safe and healthy environment.

The last of EPC Group's four fundamental values is the one that provides access to the world, our world: "**Respect the environment**".

This value is worded for EPC Group as follows: *"We believe that society thrives through respect for individuals, communities and the environment; that is why we always act ethically by including social and environmental responsibility in our actions and decisions. We are committed to a sustainable, durable dynamic of adapting industrial tools, practices and products concerning innovation, performance and respect for the environment."*

Commitment to the environment requires concrete actions and it is well known that it is the combined sum of local commitments that will enable global objectives to be collectively achieved.

Ethics in actions and the ethics of actions: EPC Group wants to make a resolute, effective and pragmatic commitment to the environment in 2022 through the implementation of an ambitious action plan based on an initial approach by EPC Group's French civil explosives subsidiary [in 2021](#).

1.3.1.3 Decentralisation, the effectiveness of which is largely due to consistency, coordination and convergence at regional and head office level: agility and subsidiarity.

In its internal structure, the Group focuses mainly on operational management through regional divisions and on support and control by other central divisions (Finance Department, Human Resources, Health and Safety Environment, Compliance Regulation and Information System, Industrial Division, Development Division, Internal Audit, etc.).

An executive committee, management committee and specialised committees bringing together all or some of these resources around the Chief Executive Officer are set up to ensure proper overall coordination.

For EPC Group, the primary focus during decentralisation is subsidiarity: only escalate to the central level whatever cannot be effectively decided at the local level.

In addition, to form a group, subsidiaries have to be part of this autonomy - based on the principle of responsibility and encouraged (rather than imposed) respect for decision-making - within a common framework and a shared identity: this is the role of coordination and management held by the group through its organisation into regional departments and central departments at the head office.

It is therefore the group's responsibility as well as its prerogative, to set a course, to define standards, to set up frameworks and procedures and to verify that they are properly being taken into consideration and adapted at the local level.

The agility offered by decentralisation is an asset, provided that a common course is set in accordance with the Group's values and objectives, because we believe that agility is a means, not an end.

Central departments and the regional departments/divisions are responsible for deployment and management under the supervision of the Chief Executive Officer.

The organisation structure is described in the below organisation chart:



Organisation chart of head office central departments and divisions.

1.3.2 CSR/DPEF governance at EPC Group: introductory remarks

As we have seen in paragraph 1.1.1, CSR covers several concerns relating to:

- ❖ social matters;
- ❖ environmental matters;
- ❖ ethics;
- ❖ human rights;
- ❖ consumer rights (for EPC Group, which does not distribute any products to consumers, this refers to business customers).

Guided by its values, EPC Group has set up and strengthened its organisation at the central level to address these concerns.

In 2020, the Group created an autonomous Group Human Resources Department to address new matters - those specific to a group HR department - and to take on existing matters that were previously filtered down to other central divisions.

In 2021, this Group division was supplemented by the recruitment of an HR Development Manager.

In 2020, the Group also created a Compliance and Regulatory Department. **In 2021**, this Compliance and Regulatory Department integrated the Group's information system skills. In 2022, this department will also cover the Group's CSR division.

At the end of 2020, at the central level, in order to strengthen the governance of EPC Group's CSR policy, the Chief Executive Officer set up a working group with suitable employees from among his immediate employees.

This working group, referred to as "G7 - CSR", is composed, under the chairmanship of the CEO, of:

- ❖ The Group Chief Financial Officer;
- ❖ The Group Director of Support and Development;
- ❖ The Director of Group Human Resources;
- ❖ The Director of Group Health, Safety and Environment;
- ❖ The Group Head of Internal Audit; and
- ❖ The Group Chief Compliance, Social Responsibility and Data Officer, who also coordinates this "G7 - CSR".

The organisation chart presented in paragraph 1.3.1.3 above identifies the positioning of central divisions that report to the Chief Executive Officer, which helps guarantee their independence and autonomy.

During 2021, the "G7 - CSR" met on several occasions, as determined by the CEO.

In particular, it worked on:

- ❖ Redrafting the values of EPC Group (see paragraph 1.2), which the CEO designated as taking priority over any overhaul of CSR policy;
- ❖ Redrafting business models for the Group's two main business lines: explosives and deconstruction;
- ❖ Analysing SDGs (UN Sustainable Development Goals) in relation to the EPC Group business model and stakeholders;
- ❖ Redefining the methodology for drafting the Non-Financial Performance Statement;
- ❖ Analysing the CSR and Non-Financial Performance Statements of the main economic operators in the explosives sector;
- ❖ Studying CSR reports and policies analysed by the association Middenext (which includes French companies listed on the second Euronext and Euronext Growth markets);

During 2021, two of the members of the "G7-CSR" group, the Group Head of Internal Audit and the Group Chief Compliance, Social Responsibility and Data Officer, actively participated in Middenext's "anti-corruption" and "CSR" working groups.

During 2021, the Group Chief Compliance, Social Responsibility and Data Officer completed a 45 hours' training on CSR, which was arranged by Middenext.

1.3.3 Social governance at EPC Group

1.3.3.1 *The Board of Directors*

The Group's Board of Directors is committed to taking all matters into consideration, including social matters.

Since 2021, some of its members have regularly received EPC Group's social indicators.

To do this, the Group's accounting reporting and consolidation software (SAP FC) has been configured so that subsidiaries can also enter social data in the Group's financial reporting and financial consolidation.

1.3.3.2 *Senior management*

Senior management, led by EPC Group's Chief Executive Officer, receives various summary elements covering the scope of social concerns targeted by CSR/the Non-Financial Performance Statement.

This information emanates from EPC Group's Human Resources Department, as well as the Health, Safety and Environment Department of EPC Group and the various regional directors or Division directors of EPC Group.

1.3.3.3 *EPC Group's central divisions*

The monitoring and management of social matters by EPC Group's central divisions are mainly the responsibility of two departments:

- ❖ The Group's Human Resources Department⁵; and
- ❖ The Group's Health, Safety and Environment⁶ Department.

In 2021, a *Group Gender Equality Committee* was created at the request of the Chief Executive Officer. Composed of 6 members - 3 women and 3 men, including the Chief Executive Officer - this committee meets on a regular basis. It therefore met for the first time in 2021.

- ❖ The below table summarises, by social matter, the involvement of the central HR department and subsidiaries in social matters⁷:

Key to below table:

- X Responsibility or joint responsibility for the matter (including audit and control).
- N/A Not applicable.
- A Audit or training or monitoring by head office on the matter.
- N/E Not currently effective within the Group: measures to be put in place.

| Main social matters: | Group Human Resources Department | General management of subsidiaries or regional management |
|---|----------------------------------|---|
| Employees | | |
| Total number of employees and breakdown of employees by sex, age and geographical area. | A | X |
| Hires and fires. | X | X |
| Remuneration (including changes). | X | X |
| Organisation of work | | |
| Organisation of working time. | A | X |
| Absenteeism. | | X |
| Health and Safety | | |
| Occupational health and safety conditions. | | X |
| Occupational accidents, including frequency and severity, as well as occupational illnesses. | | X |
| Labour relations | | |
| Organisation of social dialogue, including procedures for informing, consulting and negotiating with employees. | A | X |
| Review of collective agreements, particularly with regard to occupational health and safety. | A | X |
| Training | | |
| Training policies implemented, including those on environmental protection. | A | X |
| Total number of hours' training. | A | X |
| Equal treatment | | |
| Measures adopted to promote gender equality. | X | X |
| Measures adopted to promote the employment and integration of disabled persons. | A | X |
| Anti-discrimination policy. | A | X |

- ❖ The below table below summarises, by social matter, the involvement of the HSE central division in social matters:

Key to below table:

| | |
|-----|--|
| X | Responsibility or joint responsibility for the matter (including audit and control). |
| N/A | Not applicable. |
| A | Audit or training or monitoring by head office on the matter. |
| N/E | Not currently effective within the Group: measures to be put in place. |

| Main social matters: | Group Health, Safety and Environment Department | General management of subsidiaries or regional management |
|---|---|---|
| Employees | | |
| Total number of employees and breakdown of employees by sex, age and geographical area. | | X |
| Hires and fires. | | X |
| Remuneration (including changes). | | X |
| Organisation of work | | |
| Organisation of working time. | | X |
| Absenteeism. | X | X |
| Health and Safety | | |
| Occupational health and safety conditions. | X | X |
| Occupational accidents, including frequency and severity, as well as occupational illnesses. | X | X |
| Labour relations | | |
| Organisation of social dialogue, including procedures for informing, consulting and negotiating with employees. | | X |
| Review of collective agreements, particularly with regard to occupational health and safety. | | X |
| Training | | |
| Training policies implemented, including those on environmental protection. | X | X |
| Total number of hours' training. | | X |
| Equal treatment | | |
| Measures adopted to promote gender equality. | | X |
| Measures adopted to promote the employment and integration of disabled persons. | | X |
| Anti-discrimination policy. | | X |

1.3.3.4 General departments of subsidiaries and regional departments or divisions

Operational management of human resources is carried out, still in accordance with the principle of subsidiarity described in paragraph 1.3.1.3, at the subsidiary or regional level and within the framework of a general policy coordinated at Group level by EPC Group's Human Resources Department.

The same applies, for reasons of effectiveness and relevance explained in paragraph 1.3.1, to the day-to-day application of the health and safety policy coordinated, managed and audited by the central Health, Safety and Environment department.

These departments rely on a network of subsidiary correspondents, generally referred to as "HR support staff" and "HSE support staff".

1.3.4 Environmental governance at EPC Group

1.3.4.1 The Board of Directors

The Group's Board of Directors is committed to taking all matters into consideration, including environmental matters.

1.3.4.2 Senior management

Senior management, led by EPC Group's Chief Executive Officer, receives various summary elements covering the scope of social concerns targeted by CSR.

These elements emanate from EPC Group's Health, Safety and Environmental Department and the various regional or divisional directors of EPC Group, as well as from the network of "HSE correspondents" set up within subsidiaries by the Group's Health, Safety and Environment Director.

1.3.4.3 EPC Group's central divisions

The monitoring and management of environmental matters by EPC Group's central divisions are mainly the responsibility of the Group's Health, Safety and Environment Department.

As seen in paragraph 1.3.3.2, **in 2021**, the Group's Health, Safety and Environment director was a member of the "G7 - CSR" group.

- ❖ The below table shows, for each subject matter, the involvement of the Health, Safety and Environment central division in environmental matters⁸:

Key to below table:

| | |
|-----|--|
| X | Responsibility or joint responsibility for the matter (including audit and control). |
| N/A | Not applicable. |
| A | Audit, training and monitoring on the matter. |
| N/E | Not currently effective within the Group: measures to be put in place. |

| Main environmental matters: | Group Health, Safety and Environment Department | General management of subsidiaries or regional management |
|--|---|---|
| General environmental policy | | |
| Organisation of the company to take into account environmental issues and, where applicable, assessment or certification procedures in environmental matters. | X | X |
| Resources dedicated to the prevention of environmental risks and pollution. | A | X |
| Amount of provisions and guarantees for environmental risks (provided that this information is not likely to cause serious harm to the company in an ongoing dispute). | X (with the Group CFO) | |
| Pollution | | |
| Measures to prevent, reduce or remedy discharges into the air, water and soil that adversely impact the environment. | X (with the Group CFO) | |
| Taking into account any form of pollution specific to an activity, in particular noise and light pollution. | X | X |
| Circular economy: | | |
| Waste prevention and management | | |
| Prevention, recycling, reuse and other forms of waste recovery and disposal. | A | X |
| Fight against food waste. | | N/A |
| Circular economy: | | |
| Sustainable use of resources | | |
| Water consumption and water supply according to local constraints. | | X |
| Consumption of commodities and measures adopted to improve their efficient use. | | X |
| Energy consumption and measures adopted to improve energy efficiency and the use of renewable energies. | | X |
| Land use. | X (with the Group CFO) | X |
| Climate change | | |
| Significant sources of greenhouse gas emissions generated by the company's activity, particularly through use of the goods and services it produces. | | X |
| Measures adopted to adapt to the consequences of climate change. | N/E | N/E |
| Reduction targets set voluntarily in the medium and long term to reduce greenhouse gas emissions and the resources implemented to achieve this. | N/E | N/E |

| Main environmental matters: | Group Health, Safety and Environment Department | General management of subsidiaries or regional management |
|---|---|---|
| Protection of biodiversity | | |
| Measures adopted to preserve or restore biodiversity. | A | X |

1.3.4.4 General departments of subsidiaries and regional departments or divisions

Operational management of the Health, Safety and Environment policy is carried out, still in accordance with the principle of subsidiarity described in paragraph 1.3.1.3, at the subsidiary or regional level and within the framework of a general policy coordinated by the Group, by EPC Group's Health, Safety and Environment Department.

This department relies on a network of subsidiary correspondents, generally referred to as "HSE support staff".

1.3.5 Societal governance at EPC Group

1.3.5.1 The Board of Directors

The Group's Board of Directors is committed to taking all matters into consideration, including societal matters.

1.3.5.2 Senior management

Senior management, led by EPC Group's Chief Executive Officer, receives various summary elements covering the scope of social concerns targeted by CSR.

These elements emanate from EPC Group's Health, Safety and Environment Department and the various regional or divisional directors of EPC Group, as well as from the network of "HSE correspondents" set up within subsidiaries by the Group's Health, Safety and Environment Director and also the Group Finance Department and the Compliance, Regulatory and Information Systems Department of EPC Group.

1.3.5.3 EPC Group's central divisions

The monitoring and management of societal matters by EPC Group's central divisions are mainly the responsibility of three departments:

- ❖ The Group's Health, Safety and Environment Department;
 - ❖ The Group's Finance Department; and
 - ❖ The Group Chief Compliance, Social Responsibility and Data Officer, supported by the Group's central Internal Audit department.
- ❖ The below table shows, for each subject matter, the involvement of the Health, Safety and Environment central division in societal matters⁹:

Key to below:

- X Responsibility or joint responsibility for the matter (including audit and control).
- N/A Not applicable.
- A Audit, training and monitoring on the matter.
- N/E Not currently effective within the Group: measures to be put in place.

| Main societal matters: | Group Health, Safety and Environment Department | General management of subsidiaries or regional management |
|--|---|---|
| Societal information: | | |
| Societal commitments to sustainable development. | | |
| Impact of the company's activity on employment and local development. | A | X |
| Impact of the company's activity on local and neighbouring populations. | A | X |
| Relationships and dialogue maintained with the company's stakeholders. | | X |
| Partnership or sponsorship actions. | | N/E |
| Societal information: | | |
| Outsourcing and suppliers. | | |
| Consideration of social and environmental issues in the procurement policy. | | |
| Consideration, in relationships with suppliers and subcontractors, of their social and environmental responsibility. | | |
| Societal information: | | |
| Fair practices. | | |
| Measures adopted to promote consumer health and safety. | N/A | N/A |

- ❖ The below table shows, for each subject matter, the involvement of the Group's central Finance department:

Key to below table:

| | |
|-----|--|
| X | Responsibility or joint responsibility for the matter (including audit and control). |
| N/A | Not applicable. |
| A | Audit, training and monitoring on the matter. |
| N/E | Not currently effective within the Group: measures to be put in place. |

| Main societal matters: | Group's Finance Department | General management of subsidiaries or regional management |
|--|----------------------------|---|
| Societal information: | | |
| Societal commitments to sustainable development. | | |
| Impact of the company's activity on employment and local development. | | X |
| Impact of the company's activity on local and neighbouring populations. | | X |
| Relationships and dialogue maintained with the company's stakeholders. | | X |
| Partnership or sponsorship actions. | | N/E |
| Societal information: | | |
| Outsourcing and suppliers. | | |
| Consideration of social and environmental issues in the procurement policy. | N/E | |
| Consideration, in relationships with suppliers and subcontractors, of their social and environmental responsibility. | N/E | |
| Societal information: | | |
| Fair practices. | | |
| Measures adopted to promote consumer health and safety. | N/A | N/A |

- ❖ The below table shows, for each subject matter, the involvement of the central Compliance, Regulatory and Information Systems Department, supported by the Group's central Internal Audit department, in societal matters:

Key to below table:

| | |
|-----|--|
| X | Responsibility or joint responsibility for the matter (including audit and control). |
| N/A | Not applicable. |
| A | Audit, training and monitoring on the matter. |
| N/E | Not currently effective within the Group: measures to be put in place. |

| Main societal matters: | Group Compliance, Regulation and Information Systems Department | General management of subsidiaries or regional management |
|--|---|---|
| Societal information: | | |
| Societal commitments to sustainable development. | | |
| Impact of the company's activity on employment and local development. | | X |
| Impact of the company's activity on local and neighbouring populations. | | X |
| Relationships and dialogue maintained with the company's stakeholders. | | X |
| Partnership or sponsorship actions. | | N/E |
| Societal information: | | |
| Outsourcing and suppliers. | | |
| Consideration of social and environmental issues in the procurement policy. | N/E | |
| Consideration, in relationships with suppliers and subcontractors, of their social and environmental responsibility. | N/E | |
| Societal information: | | |
| Fair practices. | | |
| Measures adopted to promote consumer health and safety. | N/A | N/A |

1.3.5.4 General departments of subsidiaries and regional departments or divisions

Operational management of the Societal policy is carried out, still in accordance with the principle of subsidiarity described in paragraph 1.3.1.3, at the subsidiary or regional level and within the framework of a general policy coordinated by the Group by the following departments:

- ❖ Group Health, Safety and Environment;
- ❖ Group Finance;
- ❖ The Group's Compliance, Regulatory and Information Systems Department, supported by the Group's central Internal Audit department.

These departments rely on a network of subsidiary correspondents generally referred to as "HSE support staff" and "Subsidiary DAF/ RAF".

1.3.6 Ethics governance at EPC Group

In 2020, an ethics committee was created at the request of the Chief Executive Officer of EPC Group.

Its main task is to receive alerts recorded by the whistleblowing system set up within the group and which is accessible to everyone from EPC Group's public website.

The first elements of the ethics committee charter accessible on the EPC Group's public website are reproduced below; the charter clearly specifies the tasks and operation of this committee (appointment).

Ethics Committee Charter

✦ **The role of the ethics committee** is to receive and process alerts reported to it via the internal whistleblowing system. The company is responsible for adopting all necessary measures to establish the framework of its duties and for providing the Committee with the resources to fully exercise its duties.

✦ **Appointment of members of the ethics committee**

There are to be preferably at least two, preferably three members of the ethics committee. They are appointed by the CEO for a period of three years, a period which may be renewed without restrictions.

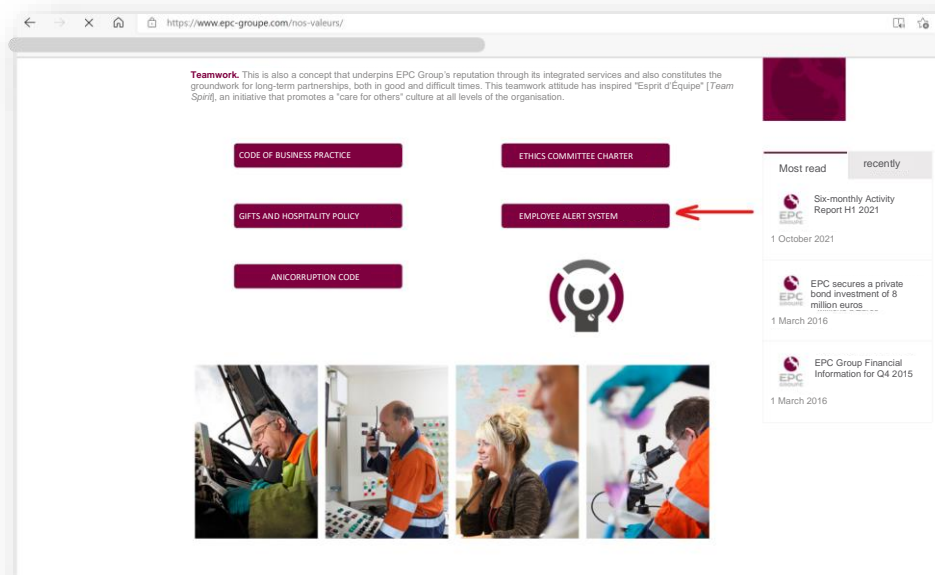
The term of office of a member of the Ethics Committee ends

- When decided by the CEO;
- Automatically in the event of termination of their employment contract at the group;
- When requested by the member.

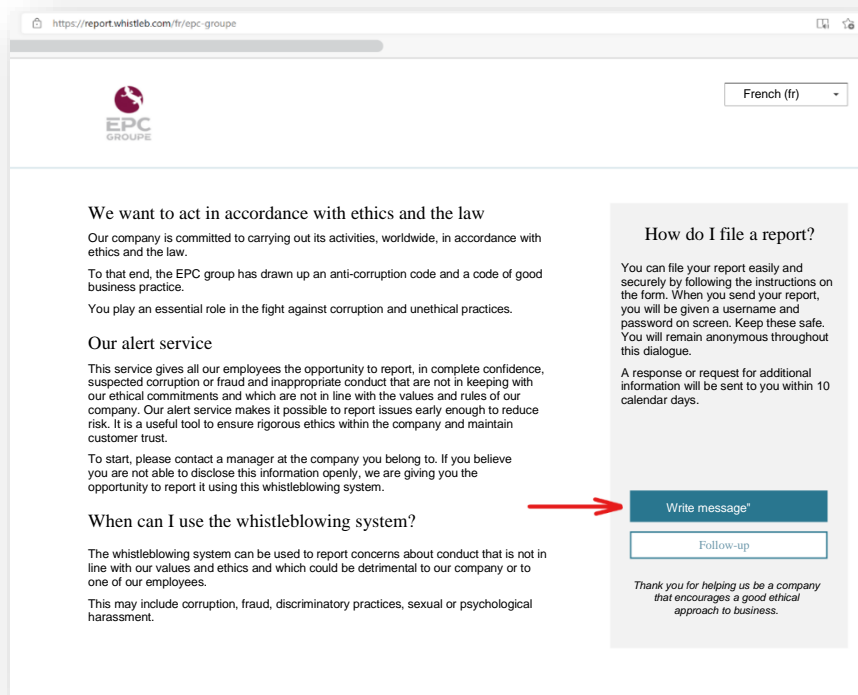
The following are currently permanent members of EPC Group's Ethics Committee:

- ❖ The Group Human Resources Director;
- ❖ The Group Chief Financial Officer;
- ❖ The Group' Director of Health, Safety and the Environment.

The Group's legal assistant acts as secretary.



Screenshot of the public page of the EPC Group website: ethics committee charter and access to the whistleblowing system.



Screenshot of the public page of the EPC Group website: whistleblowing system homepage.

https://report.whistleb.com/fr/message/epc-groupe

EPC GROUPE French (fr)

Whistleblowing system

Describe situation

Please describe the events in detail.

What are you concerned about?
 Corruption

When did this happen?

Where did this happen?

Event details (required)
 Please describe what happened and why you are filing this report.

Add attachment (optional).
 Metadata have been deleted to ensure your anonymity.
 Encrypted or password-protected files cannot be downloaded due to antivirus protection and metadata cleaning.

Screenshot of the public page of the EPC Group website: interface used to enter an alert.

1.3.6.1 The Board of Directors

The Group's Board of Directors is committed to taking all matters into consideration, including matters dealt with by the Ethics Committee.

At a meeting of the EPC Group's Board of Directors, matters dealt with by the Ethics Committee are presented to the directors.

In 2021, these matters were presented during the Board of Directors meeting on 15/12/2021.

1.3.6.2 Senior management

The Chief Executive Officer of EPC Group receives the various work carried out the Ethics Committee and makes decisions regarding any follow-up.

If he deems it necessary, the Chief Executive Officer may also refer the matter to the Ethics Committee for its opinion.

It should be noted that an alert may be referred to the Chief Executive Officer in person by anyone who would prefer to contact him as opposed to using the whistleblowing system available on the public area of the EPC Group website.

"Reports to the Chairman" may also be referred to regional directors, division directors or the directors of central departments.

1.3.6.3 EPC Group's central divisions

As part of its work and due diligence, the Ethics Committee may sound out the Group's central departments.

In 2021, it sounded out the following departments:

- ❖ The Group's internal audit department; and
- ❖ The Compliance, Regulatory and Information Systems department.

The Group's central departments may refer a matter to the Ethics Committee via the Chief Executive Officer.

1.3.7 Anti-corruption governance at EPC Group

1.3.7.1 The Board of Directors

The Group's Board of Directors is committed to taking all matters into consideration, including anti-corruption and influence peddling matters.

1.3.7.2 Senior management

Senior management, led by EPC Group's Chief Executive Officer, receives various summary elements covering the scope of anti-corruption and influence peddling concerns targeted by CSR.

This information emanates from the Group's Compliance, Regulatory and Information Systems Department supported by the Group's central Internal Audit department.

1.3.7.3 EPC Group's central divisions

The monitoring and management of anti-corruption and influence peddling mainly fall within the remit, at the level of EPC Group's central departments, of the Group's Compliance, Regulatory and Information Systems Department, supported by the Group's central Internal Audit department.

- ❖ The below table shows the involvement of the Group's Compliance, Regulatory and Information Systems Department, supported by the Group's central Internal Audit department¹⁰:

Key to below:

| | |
|-----|--|
| X | Responsibility or joint responsibility for the matter (including audit and control). |
| N/A | Not applicable. |
| A | Audit, training and monitoring on the matter. |
| N/E | Not currently effective within the Group: measures to be put in place. |

| Main anti-corruption matters: | Compliance, Regulatory and Information Systems Department supported by the Group's Internal Audit department | General management of subsidiaries or regional management |
|-------------------------------------|--|---|
| Anti-corruption information | | |
| Actions taken to prevent corruption | X | X |

1.3.7.4 General departments of subsidiaries and regional departments or divisions

Operational management of anti-corruption and influence peddling is carried out, still in accordance with the principle of subsidiarity described in paragraph 1.3.1.3, at the subsidiary or regional level and within the framework of a general policy coordinated by the Group through the following department:

- ❖ The Group's Compliance, Regulatory and Information Systems Department, supported by the Group's central Internal Audit department.

These departments rely on a network of correspondents in subsidiaries generally referred to as "Subsidiary DAF/ RAF".

1.3.8 Human Rights Governance at EPC Group

1.3.8.1 The Board of Directors

The Group's Board of Directors is committed to taking all matters into consideration, including human rights matters.

1.3.8.2 Senior management

Senior management, led by EPC Group's Chief Executive Officer, receives various summary elements covering the scope of human rights concerns targeted by CSR.

These elements emanate from EPC Group's Health, Safety and Environmental Department and the various regional or divisional directors of EPC Group, as well as from the network of "HSE correspondents" set up within subsidiaries by the Group's Health, Safety and Environment Director and the Group's Human Resources department.

1.3.8.3 EPC Group's central divisions

The monitoring and management of human rights matters by EPC Group's central divisions are mainly the responsibility of two [sic] departments:

- ❖ The Group's Health, Safety and Environment Department;
 - ❖ The Group's Human Resources Department; and
 - ❖ The Procurement Department.
-
- ❖ The below table shows, for each subject matter, the involvement of the Health, Safety and Environment central division in human rights matters¹¹:

Key to below:

| | |
|-----|--|
| X | Responsibility or joint responsibility for the matter (including audit and control). |
| N/A | Not applicable. |
| A | Audit, training and monitoring on the matter. |
| N/E | Not currently effective within the Group: measures to be put in place. |

| Main human rights matters: | Group Health, Safety and Environment Department | General management of subsidiaries or regional management |
|---|---|---|
| Information on human rights actions | | |
| Promotion and compliance with provisions of the International Labour Organisation's fundamental conventions on respect for freedom of association and the right to collective bargaining. | | X |
| Promotion and compliance with provisions of the International Labour Organisation's fundamental conventions on the elimination of discrimination in employment and occupations. | | X |

| Main human rights matters: | Group Health, Safety and Environment Department | General management of subsidiaries or regional management |
|---|---|---|
| Promotion and compliance with provisions of the International Labour Organisation's fundamental conventions on the elimination of forced or mandatory labour. | A | X |
| Promotion and compliance with provisions of the International Labour Organisation's fundamental conventions on the effective abolition of child labour. | A | X |

❖ The below table shows, for each subject matter, the involvement of the Group's central Human Resources department in human rights matters¹²:

Key to below table:

- X Responsibility or joint responsibility for the matter (including audit and control).
N/A Not applicable.
A Audit, training and monitoring on the matter.
N/E Not currently effective within the Group: measures to be put in place.

| Main human rights matters: | Group Human Resources Department | General management of subsidiaries or regional management |
|---|----------------------------------|---|
| Information on human rights actions | | |
| Promotion and compliance with provisions of the International Labour Organisation's fundamental conventions on respect for freedom of association and the right to collective bargaining. | A | X |
| Promotion and compliance with provisions of the International Labour Organisation's fundamental conventions on the elimination of discrimination in employment and occupations. | A | X |
| Promotion and compliance with provisions of the International Labour Organisation's fundamental conventions on the elimination of forced or mandatory labour. | | X |
| Promotion and compliance with provisions of the International Labour Organisation's fundamental conventions on the effective abolition of child labour. | | X |

2 BUSINESS MODEL

The business model aims to answer three successive questions:

- ❖ What resources does EPC Group have and need?
- ❖ How does EPC Group create value through its business?
- ❖ What are the results of the business and the objectives of EPC Group?

We will see that there can only be one valid answer to the first and third questions, the second question requires that two types of value creation chain be distinguished for the two main business lines of EPC Group, civil explosives and deconstruction.

2.1 RESOURCES

2.1.1 Human resources: employees and skills.

2.1.1.1 Employees

There are various types of employees, such as FTEs (Full-Time Equivalents), active employees at the end of the period (31/12/2021) and the list of employees under contract at the end of the period (31/12/2021).

There is no standard definition of an employee type such as employees who are not under contract with subsidiaries (e.g. temporary staff) or employees who are under contract (but who may be part-time) in all the countries in which EPC Group operates. This means that employees are not recorded in the same way in all EPC Group subsidiaries.

In addition, the number of employees differs greatly from one subsidiary to another and depends on their activity.

Finally, the principle employed to recognise the equity-method portion of subsidiaries in which EPC Group is not the majority shareholder and therefore does not have control of these subsidiaries, provides an additional element of complexity. Because, even though those minority subsidiaries do not fall within the scope of consolidation - and therefore do not strictly fall within the scope of this Non-Financial Performance Statement - certain policies and actions carried out by EPC Group cannot be adapted to the limits of the consolidation scope. Examples of this are Health and Safety audits, and various training and awareness programmes.

The figures for employees are presented in paragraph 4.1.

2.1.1.2 Skills

EPC Group operates in business lines that are often referred to as "niche", mainly characterised by the very high level of regulatory constraints and the relatively low number of economic operators in these sectors.

These "niche" sectors in which EPC Group operates are:

- ❖ Explosives and others (as defined in this Non-Financial Performance Statement, the "additives" business and the "innovation" business are linked to the "explosives and others" business),
- ❖ Demolition;
- ❖ The circular economy.

The highly specialised skills required to conduct these activities are virtually unable to be found directly in the initial training offered in countries where EPC Group is located, regardless of education level.

EPC Group employees are therefore people who are trained by subsidiaries in their own business lines and whose experience, both prior to recruitment and throughout the period they work at EPC Group, is essential. Training efforts in the strict sense of the term do not reflect the entire process whereby EPC Group employees acquire such skills.

Figures on average age, average length of service and training received are presented in paragraph 4.1.

2.1.2 Techniques and know-how

EPC group has accumulated a significant number of techniques and know-how over more than 125 years.

One of EPC Group's mottoes, since it was created, is to rely as little as possible on third-party technologies in its core business lines, particularly in its main sector, civil explosives.

This concern for technological and technical independence can be illustrated by three key elements:

- ❖ First, an innovation department which for a number of years, has taken the form of a dedicated subsidiary, Nitrates and Innovation;
- ❖ Second, the number of trademarks and components of protected trademarks as defined in intellectual property law: there are currently no fewer than 48 elements protected for classes¹³ as diverse as classes 1 (chemicals), 2 (paint), 5 (pharmaceutical products), 6 (common metals and their packaging), 13 (pyrotechnic products), 16 (print products), 17 (rubber), 19 (non-metallic construction materials), 35 (advertising), 36 (insurance), 37 (construction), 38 (telecommunications), 39 (transport), 40 (metal sawing), 42 (technical evaluations relating to design (engineering work)), and for countries on almost every continent;
- ❖ And, lastly, by means of internationally protected patents whose inventors are almost all EPC Group employees who are still part of the Group's workforce.

These trademarks, trademark elements and patents cover techniques, technologies, production methods and products.

2.1.3 Financial resources

Although the purpose of the Non-Financial Performance Statement - as its name clearly indicates - is not intended to address in detail the financial elements of EPC Group (for this we refer the reader to the other components of the Single Registration Document), it is obvious that financial resources are one of the significant resources on which EPC Group is able to rely in order to carry on its business.

EPC Group is therefore able to rely on:

- ❖ its shareholders, including its majority shareholder Argos Wityu SAS;
- ❖ turnover of €377.6 million, up 11.6% on 2020.

2.2 "EXPLOSIVES" BUSINESS MODEL AND VALUE CHAIN

EPC Group's business model for its explosives business can be summarised graphically as shown in paragraph 2.3.3 below.

The explosives business value chain can be described in three parts:

- ❖ Suppliers and logistics upstream of the explosives business
- ❖ Economic operations of the explosives business
- ❖ Customers of the explosives business

2.2.1 Suppliers and logistics upstream of the explosives business

The commodities of the explosives business are obviously modelled on the chemistry and physics of explosives.

Chemically speaking, an explosive requires the intimate and sustainable presence of oxygen and carbon atoms.

The main commodities purchased by EPC Group for the manufacture of explosives are therefore:

- ❖ Oxidisers, which provide oxygen atoms: in this case, mainly ammonium nitrate;
- ❖ Fuels, which provide carbon atoms; in this case, fuel and mineral oils;
- ❖ Binders; in this case, surfactants; and
- ❖ Certain ingredients, such as aluminium powder.

However, for many of the civil explosives manufactured by EPC Group, a physical dimension must also be included because it is necessary, for the range of explosives known as mixtures, to introduce porosities, i.e. gas microbubbles.

Therefore, the commodities purchased by EPC Group also contain elements used to create these porosities.

By far the primary commodity, in terms of volume, is nitrates and mostly ammonium nitrate.

Manufactured almost exclusively using natural gas, the price of ammonium nitrate is closely correlated to the volatility of hydrocarbon and energy prices, which explains the variations in the price of this commodity and its impact on the production prices of civil explosives manufactured by EPC Group.

Ammonium nitrate is no longer manufactured in France. It must therefore be imported from producing countries. This also explains the significant amount of upstream logistics in the value chain of EPC Group's explosives business.

Lastly, in order to initiate a civil explosives column, it is necessary to use explosives known as boosters and detonators which are hardly if ever manufactured by EPC Group. These so-called trading products are also imported by subsidiaries from producing countries when the country of in which said subsidiaries are established does not have any booster explosives manufacturers.

Lastly, some of the explosives manufactured are packaged. EPC Group therefore procures packaging products and transports these to its factories.

2.2.2 Economic operations of EPC Group's explosives business

2.2.2.1 *Manufacture of civil explosives*

Without going into detail as to how civil explosives are manufactured, we can recall three points on the processes used in EPC Group's subsidiaries:

❖ Static plants

A large portion of civil explosives produced by subsidiaries manufacturing explosives are produced at static plants. Plain detonators and fuses are produced at these. They also produce an intermediary commonly referred to as a "non-explosive matrix" which will then be used by MEMUs (see below).

❖ EMPs

Specific to the technological know-how of EPC Group, EMPs (Euro-Modular Plants) are containerised manufacturing units (ISO-type shipping containers). These EMPs can be installed on appropriate land more quickly than a traditional "static" plant, and be authorised to produce almost all of EPC Group's explosives range.



Photo of an EMP (source: EPC Group website)

❖ MEMUs

The Decree of 29 May 2009 on the carriage of dangerous goods by land (known as the "ADR decree") is appended to the ADR (European Agreement concerning the International Carriage of Dangerous Goods by Road concluded on 30 September 1957, known as the ADR Regulation). Paragraph 1.2.1 ADR defines MEMUs as follows:

- *"Mobile Explosive Manufacturing Unit" (MEMU)*, a unit, or a vehicle mounted with a unit, for manufacturing explosives from dangerous goods that are not explosives and loading them in blast holes. The unit consists of various tanks and bulk containers and equipment for the manufacture of explosives, as well as pumps and related equipment. The MEMU may have special compartments for packaged explosives.*
- Reference shall therefore be made herein to UMFe or MEMU since, as stated in the ADR: *"*The acronym "MEMU" corresponds to the English term "Mobile Explosives Manufacturing Unit".*

MEMUs are therefore "factory trucks" that manufacture explosives from a non-explosive intermediary called a "non-explosive matrix". As explained above, the non-explosive matrix can be manufactured either in static plants or at EPC Group EMPs.



Photo of a MEMU (source: EPC Belgium website)

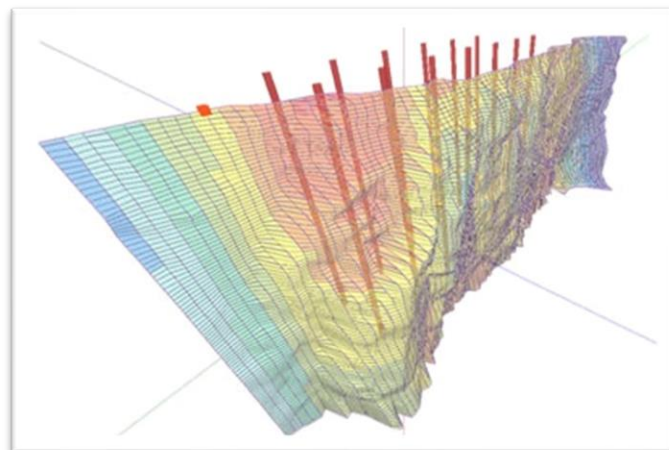
2.2.2.2 Implementation of civil explosives

In the vast majority of cases, civil explosives are used to break rock.

This takes place either in quarries, to extract aggregates of a size defined by the carrier, in an aerial or underground mine to extract ore, or, finally, for public works, also on the surface or underground (tunnel).

The operation therefore consists of successively carrying out the following operations:

- ❖ Producing a **design of the fire plan** (3D statement of the tunnel face, diameter, depth, angle and mesh of blast holes, determination of the explosive(s) to be used - including explosives and boosters);



3D representation of a fire plan (source: EPC Group website)

- ❖ **Drilling** of blast holes in accordance with the fire plan. This operation is, ultimately, very important, on the one hand, because highly important information can be gathered during drilling (presence of cracks, hardness of drilled rock, presence of water, deviation of drilling, etc.), and, on the other hand, because the information gathered may require readjustment of the original fire plan;



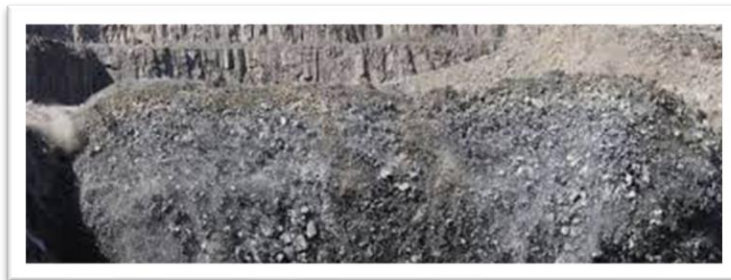
Preparing for drilling and quarrying (source: EPC Group website)

- ❖ **Blasting**; i.e. placing detonators and boosters, inserting the right amount of suitable explosives, not only for the geological conditions, but also for the desired effects (brisance and thrust) within the constraints imposed (vibrations, projection, cracking, underground ventilation, etc.) or sustained (static and dynamic pressure) in order to achieve the determined objectives (preservation of the fire front for subsequent shotfiring, positioning of the blast, calibre of the blasted rock, fine percentage, etc.),



A quarry mining operation using a MEMU (source: EPC France website)

- ❖ The last operation in this simplified civil explosive implementation sequence, **shotfiring**, is the tricky part for several reasons; firstly, because the immediate or deferred risk (missed shot) is largely linked to this final sequence, secondly, because the success of the shot depends on it, and finally because the shooter must assume significant legal liability.



Shotfiring operation (source: EPC France website)

Design, drilling and blasting can be provided to EPC Group customers as an independent service.

These constitute a fundamental link in the production chain of a site, mine or quarry. As we have seen, adapting this service to the specific conditions of an operation and its objectives requires a high capacity to mobilise resources and genuine technicality. In addition to offering a range of high-quality explosives, EPC Group provides its customers with its expertise and knowledge to adapt shotfiring parameters in order to continuously improve the blasting process.

Teams of experienced EPC Group engineers, technicians and operators work at 20 specialised subsidiaries in Europe, North America, Africa and the Middle East, equipped with state-of-the-art tools and technologies, enabling them to intervene both in front-end profiling and in the control of environmental shotfiring issues, as well as in the design of fire plans, the loading of explosives and blasting services to the nearest cubic metre.

On-site safety is a major growth driver of EPC Group's drilling and blasting activities, the Group having developed multiple technologies which enable it to provide advanced and high value-added solutions to its network of customers in over 25 countries.

These technologies include the EXPERTIR 3D software, developed internally by miners for miners. In this software, EPC Group has compiled the expertise of its engineers and technicians. The software is able to integrate the 3D profiles of fronts, regardless of the type of technology used (lasers, digital photograms, drones). Once obtained, these geometrical data can be used to directly model the location, coordinates, tilt, azimuth and depth of blast holes.

The drilling parameters as well as the drilling report can also be imported into the EXPERTIR 3D software, thereby assisting in gathering a set of shot-related data in a single database that enables a loading plan and shotfiring sequence to be created.

EPC Group's drilling-blasting service also includes checking the exact position of each hole (GPS location system, inclinometer probe). Using EXPERTIR 3D, geometrical information and field data are collected and reconciled, providing engineers with all available information to produce a safe fire plan, guaranteeing optimum block size distribution and respect for the environment by controlling vibrations.

EXPERTIR 3D makes it possible to obtain a hole loading plan for high quality blasting. All fire plans are integrated into a comprehensive topographic model, enabling continuous monitoring of the blasting operation.

EPC Group offers this service to those of its customers who carry out their own design, drilling, blasting and/or shotfiring operations.

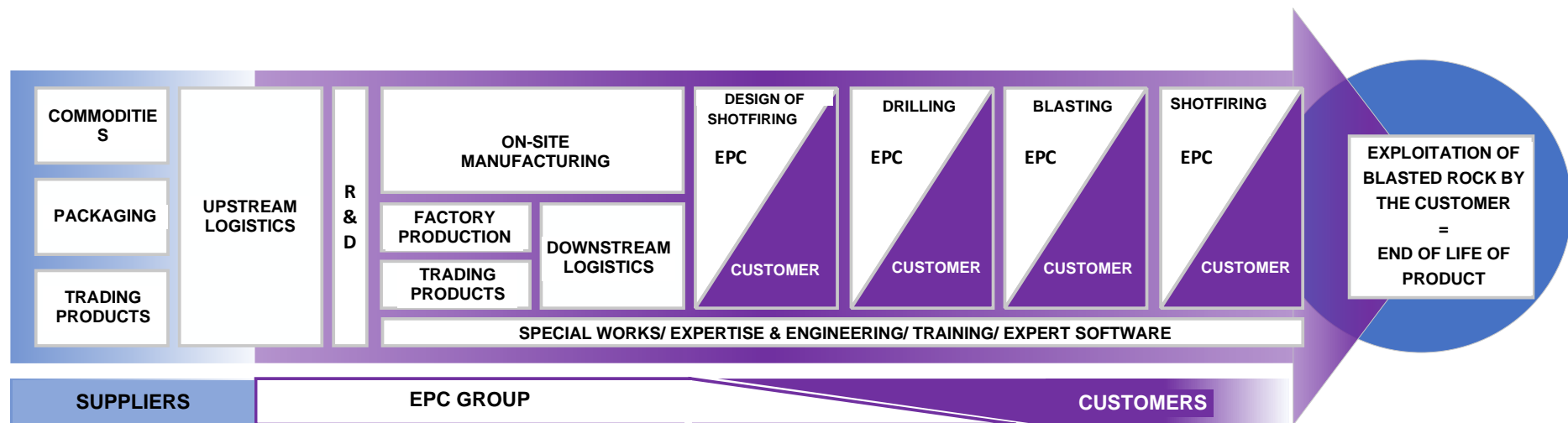
2.2.3 Customers of EPC Group's explosive business

The customers of EPC Group's explosive business are quarrymen, mining companies and public works operators, as well as some of these end operators' subcontractors,

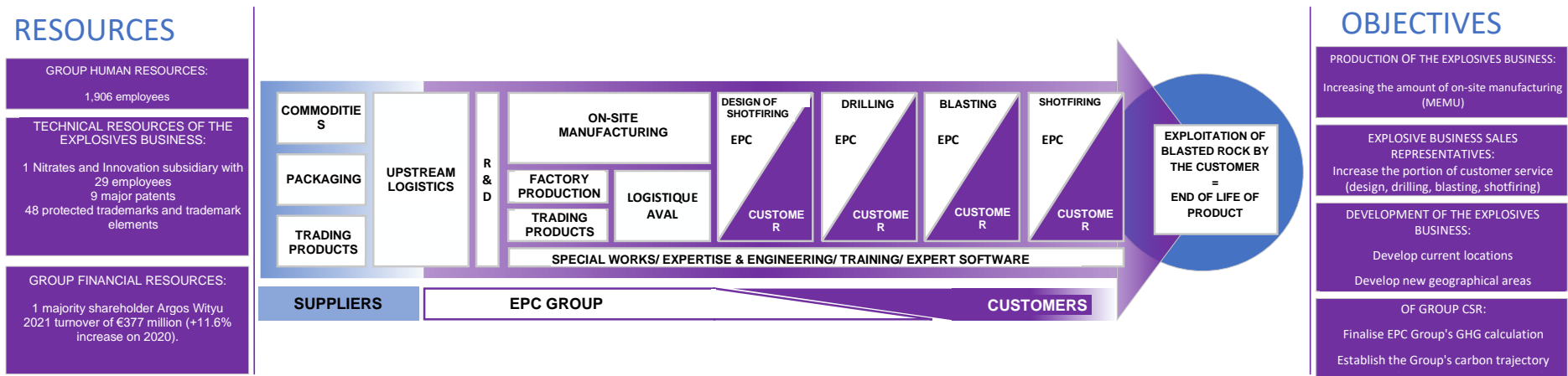
such as drillers and blasters and, less frequently, other operators in the manufacture of civil explosives.

Finally, there is a not insignificant trading volume between EPC Group subsidiaries.

2.2.4 Summary and graphical representation of the value chain of EPC Group's "explosives" business



2.2.5 Summary and graphical representation of the business model of EPC Group's "explosives" business



2.3 "DECONSTRUCTION" BUSINESS MODEL AND VALUE CHAIN

Companies in the demolition division carry out two main types of activities:

- ❖ Demolition, deconstruction, asbestos removal and lead removal operations;
- ❖ Recycling operations and the creation of second-hand commodities strictly within the framework of what is referred to as the "circular economy".

2.3.1 Demolition, deconstruction, asbestos removal, lead removal and recycling - the circular economy

EPC Group's demolition division operates throughout France in all types of industrial, urban, commercial and engineering projects, both public and private.

2.3.1.1 *ATD*

Located in the heart of the Seine Valley since 1945, ATD has invested in the industrial sector in operations which are always very specific. In this highly constrained context, ATD has developed excellent know-how, a strong ability to adapt and creativity.

Over the years, ATD has expanded its capabilities to cover all business applications, without exception: deconstruction, dismantling, asbestos and lead treatment, decontamination.

In the city, in industry, on sensitive or heritage sites and throughout the country, ATD takes advantage of its broad range of experience on all public and private projects.

2.3.1.2 *Occamat*

For more than 30 years, Occamat has been developing and mastering techniques and expertise related to demolition, dismantling and deconstruction.

Historically located in the Angevin region, Occamat is spread out across the country, mainly in the Greater Paris region, the Grand Ouest region and the Greater Lyon region through its Rhône-Alpes branch. OCCAMAT is involved in all types of operation: private, public, urban, heavy or commercial industry, total or partial demolition, dismantling or restoration etc.

Its extensive experience in the management of highly technical and large-scale projects has enabled it to develop expertise in the management and steering of high-profile projects. Due to its history, the number and complexity of operations carried out and all its specific skills, Occamat's model is unique in the French landscape of demolition and deconstruction businesses.

2.3.1.3 PRODEMO

PRODEMO has been operating in demolition in the Greater Paris region for over 40 years.

PRODEMO specialises in hyper-urban projects of all sizes and provides its private and public clients with a local service, high-quality performance and respect for objectives.

In support of changes to its business line, PRODEMO has diversified into the following applications: Asbestos removal/ Lead removal/ Cleaning/ Re-use.

2.3.1.4 Occamiente

Occamiente is a long-standing player in the French decontamination, asbestos removal and lead removal markets.

Occamiente supports its customers in their decontamination projects on occupied and unoccupied sites, in industrial and urban areas, with restoration, maintenance and deconstruction work.

With experience in concurrent work, Occamiente operates throughout the country on all types of projects, environments and materials.

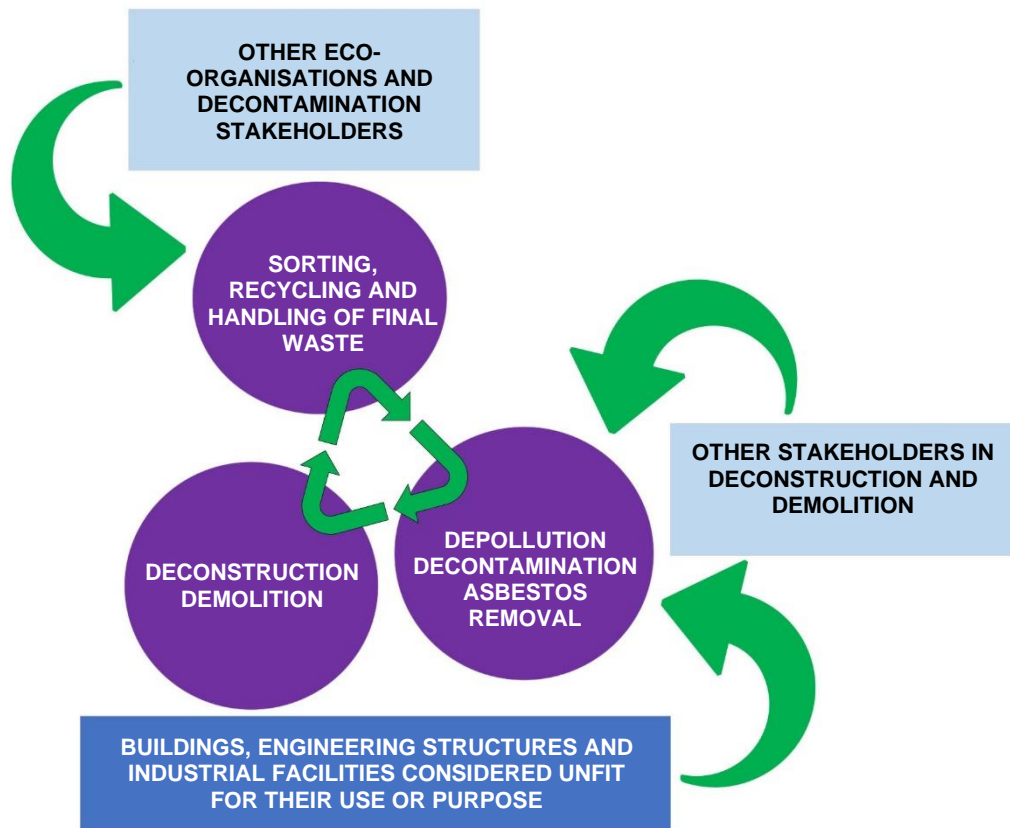
Based on risk analysis work, Occamiente is working on the deployment of pragmatic solutions adapted to its customers' constraints in compliance with regulations and traceability.

2.3.1.5 2B Recyclage

Since 2000, 2B Recyclage has supported construction and public works companies, manufacturers and local authorities in optimising and managing their waste.

The 4 independent and complementary business lines of 2B Recyclage are: mobile crushing, the management of polluted sites and soils, the management of construction and public works waste and the management of waste containing asbestos.

2.3.2 Summary and graphical representation of the value chain of EPC Group's "Demolition" business



2.3.3 Summary and graphical representation of the business model of EPC Group's "Demolition" business

RESOURCES

GROUP HUMAN RESOURCES:

1,906 employees

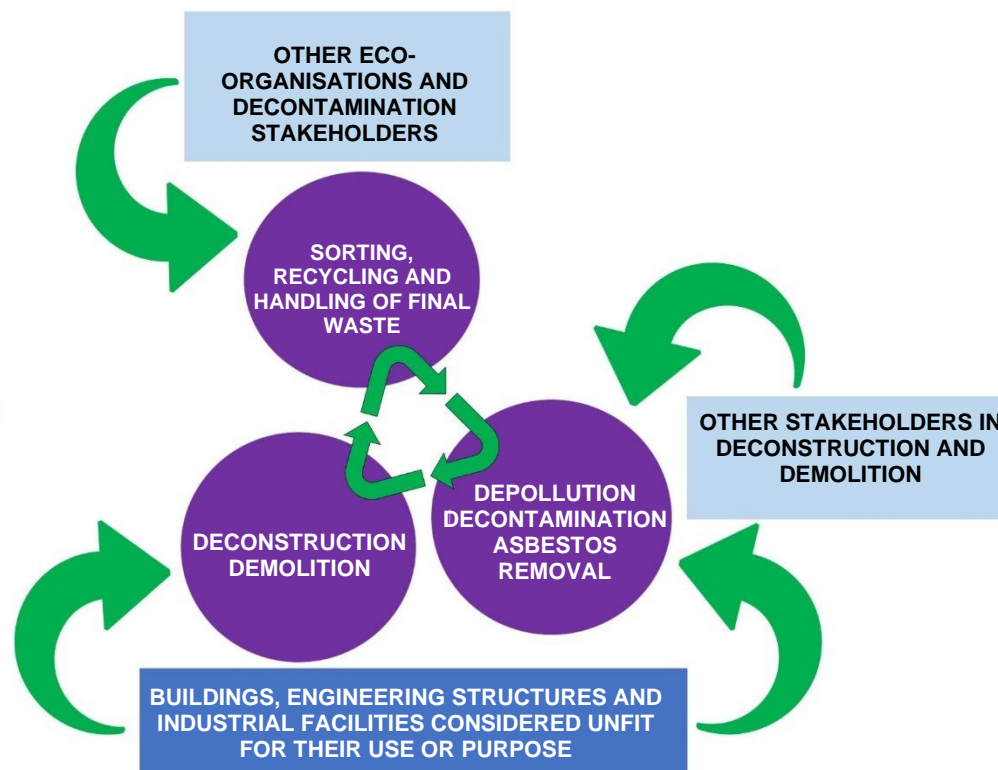
TECHNICAL RESOURCES OF THE "DEMOLITION" BUSINESS:

5 operating subsidiaries in the demolition division with:

476 employees, adapted teams, consulting and engineering units, regulatory experts.

GROUP FINANCIAL RESOURCES:

1 majority shareholder Argos Wityu
2021 turnover of €377 million (+11.6% on 2020).



OBJECTIVES

POSITIONING OF THE DEMOLITION BUSINESS:

More visibly part of the new national regulatory framework for the expanded liability of construction manufacturers

DEMOLITION SALES REPRESENTATIVES:

Increase market share

DEVELOPMENT:

Strengthen current operations in France

Develop new markets, internationally and in France

GROUP CSR:

Finalise EPC Group's GHG calculation
Establish the Group's carbon trajectory

3 RISKS AND CHALLENGES

In this section, we will discuss the described risk analysis, the stakeholder ecosystem and EPC Group's materiality matrix.

3.1 RISK ANALYSIS

The risk analysis of EPC Group is common to the documents that make up the Single Registration Statement.

We therefore refer the reader to paragraph 3 of the SRS.

It should be noted that while the risks in the SRS are rated in terms of probability of occurrence, impact and criticality, in this Non-Financial Performance Statement, we will use, from a threefold perspective, risks in their challenges, their impact with regard to the UN SDGs and the associated policies.

The risks identified are as follows:

- ❖ 3.1.1. : Risks relating to the occurrence of industrial accidents;
- ❖ 3.1.2: Risks relating to the occurrence of a pandemic;
- ❖ 3.1.3: Risks relating to EPC Group's dependence on certain suppliers;
- ❖ 3.1.4: Risks relating to structural changes in consumption patterns;
- ❖ 3.1.5: Risks related to joint ventures entered into by the Group;
- ❖ 3.1.6: Risks relating to an IT failure;
- ❖ 3.2.1: Risks relating to fluctuations in commodity prices;
- ❖ 3.2.2: Risks relating to the availability of certain commodities;
- ❖ 3.2.3: Political risks;
- ❖ 3.2.4: Liquidity risks.

The below tables represent, for the risks considered in the successive sections, the types of risks by type of phenomena generated by the occurrence of the risk studied, the challenges of the occurrence of the risk in question and the list of EPC Group policies put in place to mitigate their occurrence and consequences.

3.1.1 Risks relating to the occurrence of industrial accidents

| SRS risk | Type of SRS risk | Challenges of SRS risks | Policy |
|---------------------------------------|--|-----------------------------------|---|
| SRS 3.1.1-Industrial accidents | Explosion, fires; Pollutant discharges; | Limit production | Pol. 1 - Health, Safety and Environment Management System |
| | | | Pol. 2 - Health and safety reporting (monthly) |
| | | Criminal liability of directors; | Pol. 3 - Group insurance programme (operating loss, occupational accident and provident coverage, environmental liability, "investment policy risk", riots and terrorism) |
| | | Damage to the Group's reputation; | |
| | | Liability for damages. | Pol. 4 - Soil sampling and analyses (identified sites) |
| | | | Pol. 5 - IFRS provision |
| | | | Pol. 6 - Environmental reporting |

3.1.2 Risks relating to the occurrence of a pandemic

| SRS risk | Type of SRS risk | Challenges of SRS risks | Policy |
|-----------------------------|------------------|--|---|
| SRS 3.1.2 - Pandemic | Illness | Increased absenteeism with an impact on production | Pol. 7- Videoconferencing and working from home |
| | | Travel disruption for management, control and training | Pol 8 -Personal Protective Equipment (pandemic) |

3.1.3 Risks relating to EPC Group's dependence on certain suppliers

| SRS risk | Type of SRS risk | Challenges of SRS risks | Policy |
|--|---|-------------------------|--------------------------------------|
| SRS 3.1.3-Critical supplier disruptions | One-off or permanent failure of a critical supplier | Decrease in production | Pol. 9 - Business Continuity Plan |
| | Increase in the Group's dependency (consolidation of FNR) | Loss of competitiveness | Pol. 10 - Procurement KPIs |
| | Significant change to the pricing policy of critical suppliers. | Financial losses | Pol. 9 - Business Continuity Plan |
| | | | Pol. 11 - Monthly Procurement Report |

3.1.4 Risks related to structural changes in consumption patterns

| SRS risk | Type of SRS risk | Challenges of SRS risks | Policy |
|--|-----------------------------------|--|--|
| SRS 3.1.4 - Decline in diesel consumption | Energy policies penalising diesel | Decrease in results on the diesel additive market. | Pol. 12 - Foreseeability: long time to adapt the company to a certain risk |

3.1.5 Risks related to joint ventures entered into by the Group

| SRS risk | Type of SRS risk | Challenges of SRS risks | Policy |
|--|--------------------------------------|--|--|
| SRS 3.1.5 - Risks related to joint ventures | Disagreements with majority partners | Decrease in group results | Pol. 13 - Drafting robust joint venture agreements |
| | | Instability of the geographical positions of JVs | |

3.1.6 Risks related to an IT failure

| SRS risk | Type of SRS risk | Challenges of SRS risks | Policy |
|-------------------------------|------------------|--|-----------------------------------|
| SRS 3.1.6 - IT failure | IT failure | Partial or total business interruption | Pol. 9 - Business Continuity Plan |
| | | Financial losses | |

3.1.7 Risks related to fluctuations in commodity prices

| SRS risk | Type of SRS risk | Challenges of SRS risks | Policy |
|---|---|-------------------------|---|
| SRS 3.2.1 - Rise in commodity prices | Time frames for repercussions or non-repercussions of price increases | Financial losses | Pol. 14 - Repercussion of price increases |

3.1.8 Risks relating to the availability of certain commodities

| SRS risk | Type of SRS risk | Challenges of SRS risks | Policy |
|---|--|-------------------------|-----------------------------------|
| SRS 3.2.2 - Risk relating to the availability of certain commodities | Lack of availability of logistics resources (maritime) due to post-pandemic recovery | Financial losses | Pol 15. - Master supply contracts |
| | Disruption to ammonium nitrate supply | | Pol. 9 - Business Continuity Plan |

3.1.9 Political risks

| SRS risk | Type of SRS risk | Challenges of SRS risks | Policy |
|------------------------------------|-------------------------------|--|---|
| SRS 3.2.3 - Political risks | Removal of expatriate staff | Temporary or lasting decline in turnover | Pol. 16 - Geographical diversification |
| | Inability to operate | | Pol. 3 - Group insurance programme (operating loss, occupational accident and provident coverage, environmental liability, "investment policy risk", riots and terrorism) |
| | Inability to receive supplies | | |
| | Destruction of facilities | | Pol. 21 - Anti-Corruption |

3.1.10 Liquidity risks

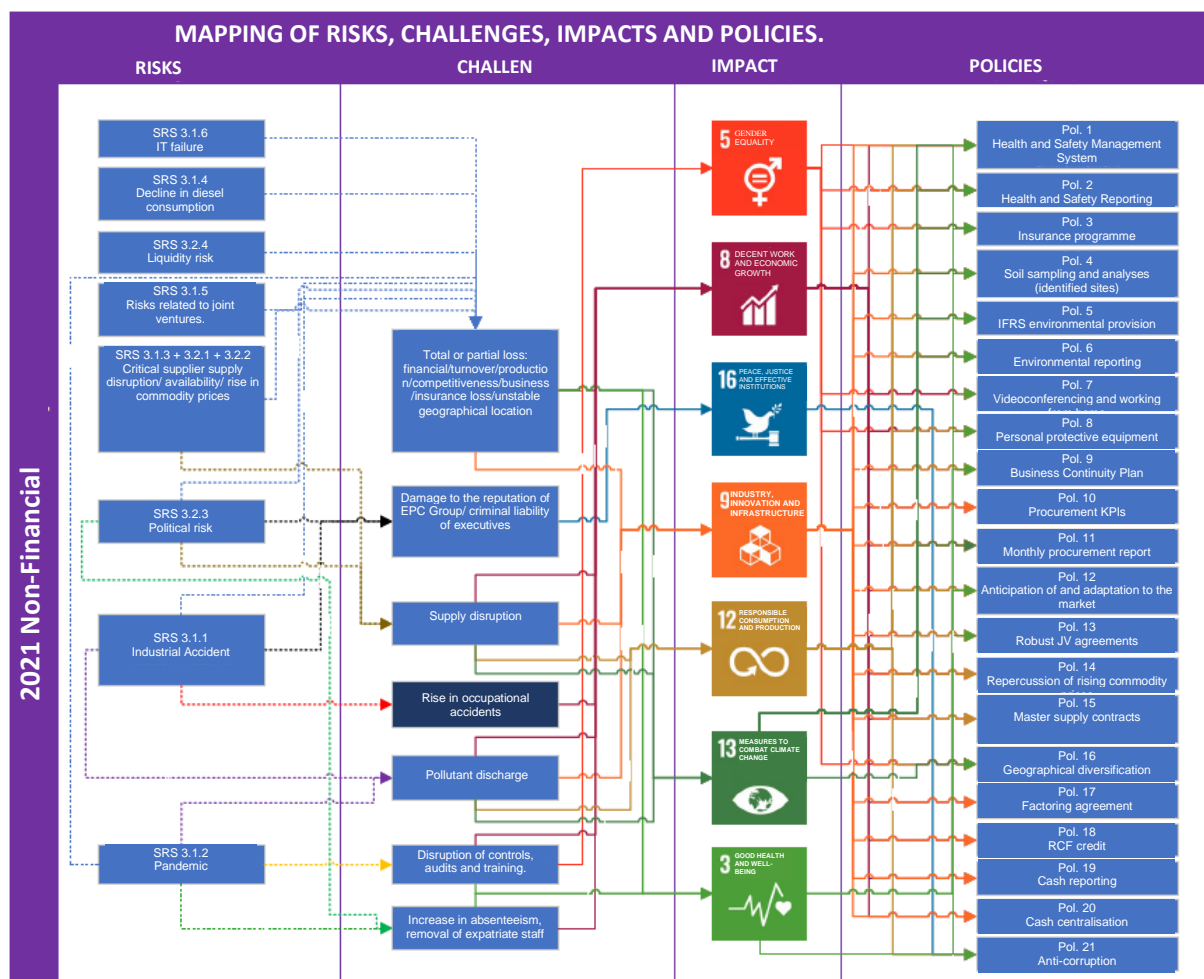
| SRS risk | Type of SRS risk | Challenges of SRS risks | Policy |
|------------------------------------|-----------------------|-------------------------|--|
| SRS 3.2.4 - Liquidity risks | Risk of non-liquidity | Financial loss | Pol. 17 - Factoring Contract |
| | | | Pol. 18 - RCF Credit |
| | | | Pol. 19 - Monthly Cash Reporting |
| | | | Pol. 20 - Cash Centralisation France + Spain + Belgium + Italy |

NOTE: RCF credit: confirmed revolving credit.

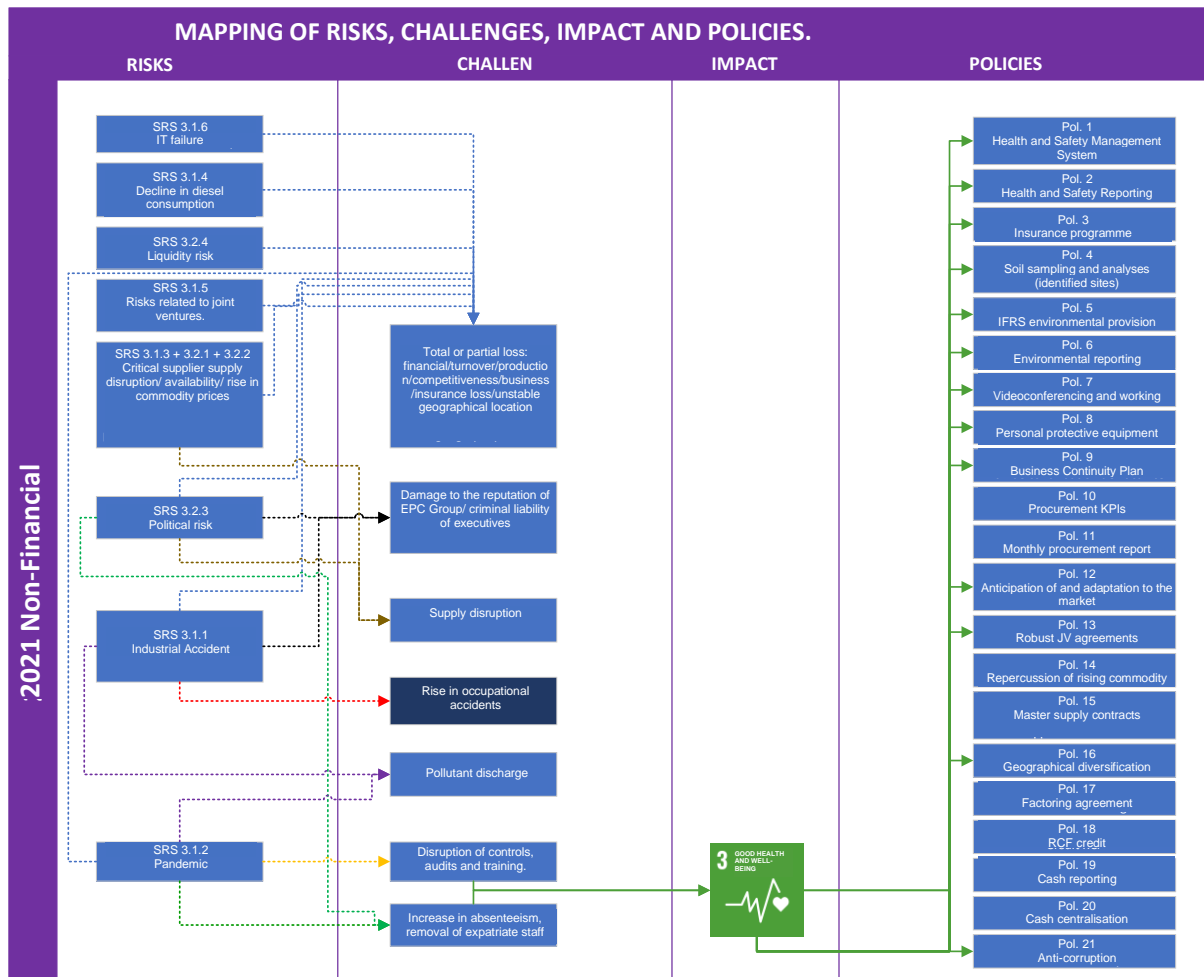
3.2 MAPPING OF RISKS, CHALLENGES AND POLICIES BY IMPACT TYPE

The impact types are examined here in relation to the UN's Sustainable Development Goals.

This impact analysis is presented in the form of a general graphic mapping below, then, to facilitate reading, presented separately according to impact (UN SDG).



3.2.1 Mapping of risks, challenges and policies for their impact on SDG 3 "good health and well-being"

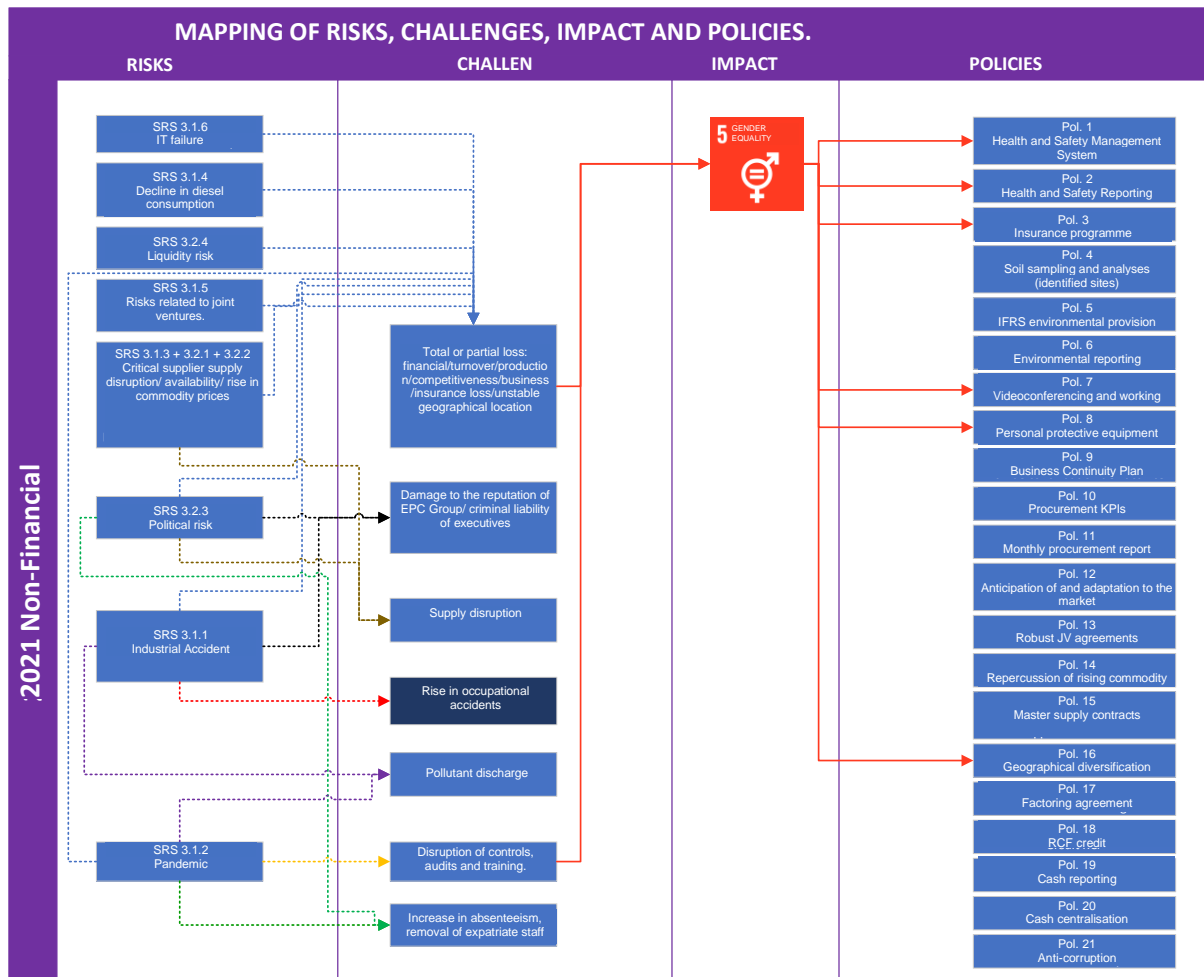


Assuming that we will use one of the four fundamental values of EPC Group (see paragraph 1.2) for each SDG associated with a type of impact.

In this case, the value mainly associated with SDG 3 - "good health and well-being" is the value: **"Operate safely"**, which, by way of reminder, is achieved by: *"We want to ensure a safe and healthy environment for our employees, customers, subcontractors and shareholders. To do this we must be a benchmark in terms of safety in each of our activities."*

The policies associated with this type of impact are clearly identified in the diagram.

3.2.2 Mapping of risks, challenges and policies for their impact on SDG 5 "gender equality"

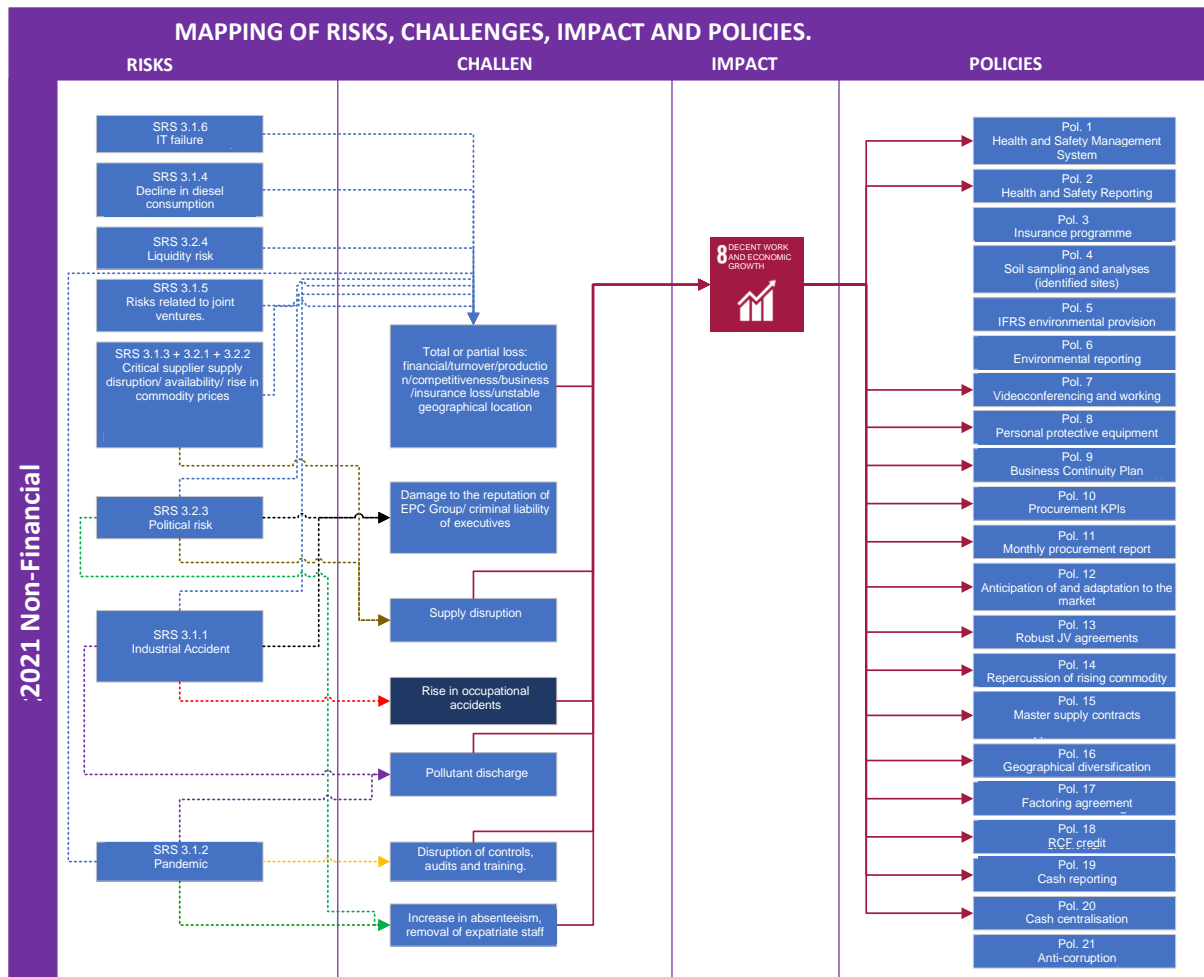


Assuming that we will use one of the four fundamental values of EPC Group (see paragraph 1.2) for each SDG associated with a type of impact.

In this case, the value mainly associated with SDG 5 - "gender equality" is the value: **"Respect our employees"**, which, by way of reminder, is achieved by: *"We value individual contributions and initiatives, creating an environment of trust. We also believe that major achievements are the result of teamwork. As such, we want to attract, develop and retain the best talent for our company, motivate our employees, encourage them to give their best and to be efficient and treat each person in line with the values of EPC Group."*

The policies associated with this type of impact are clearly identified in the diagram.

3.2.3 Mapping of risks, challenges and policies for their impact on SDG 8 "Decent work and economic growth"

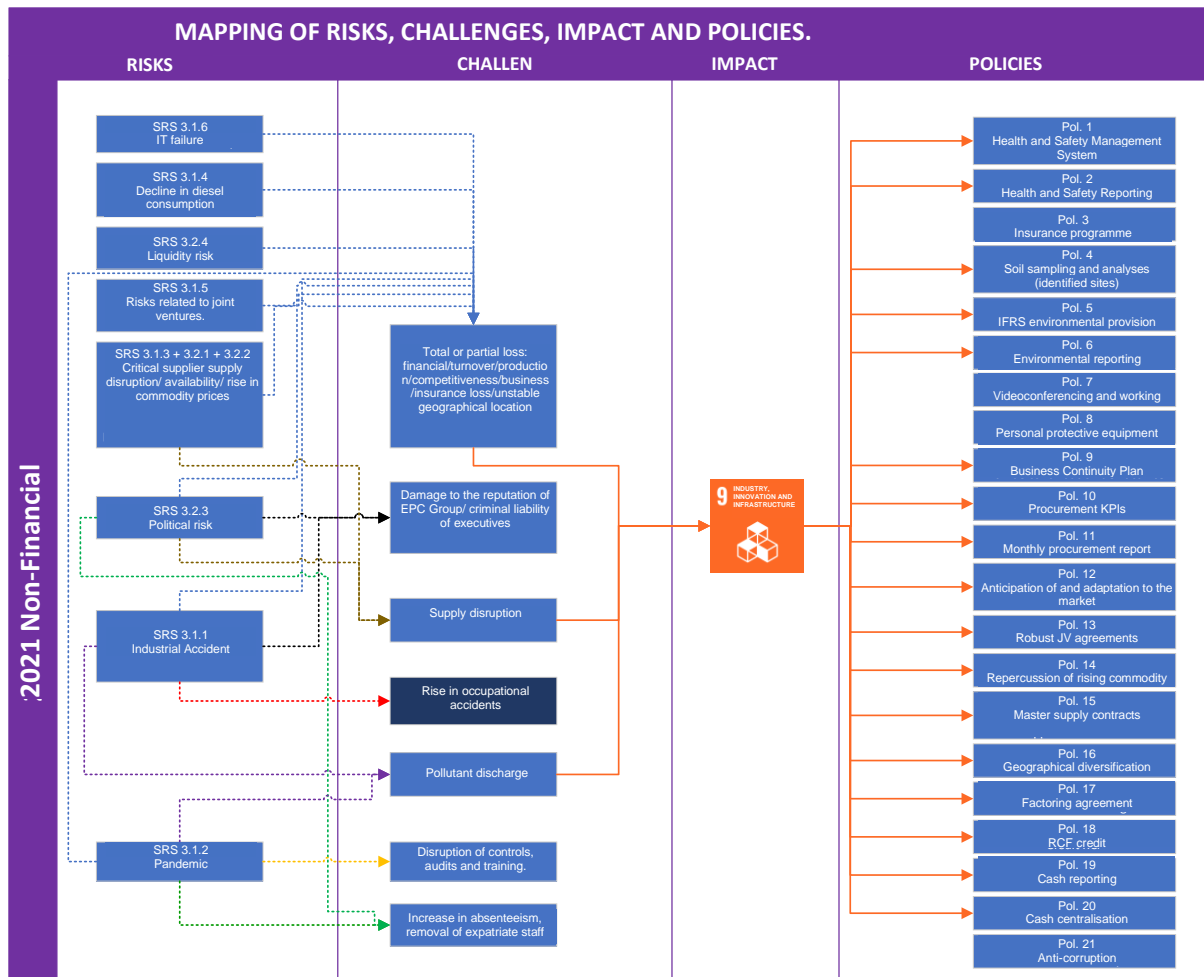


Assuming that we will use one of the four fundamental values of EPC Group (see paragraph 1.2) for each SDG associated with a type of impact.

In this case, the value mainly associated with SDG 8 - "Decent work and economic growth" is the value: **"Create value for the customer"**, which is achieved by: *"We know that our sustainability requires satisfied and committed customers, which is why we are doing everything we can to enable our customers to improve their productivity and the quality of their operations by guaranteeing them high-performance, high-quality products and services."*

The policies associated with this type of impact are clearly identified in the diagram.

3.2.4 Mapping of risks, challenges and policies for their impact on SDG 9 "Industry, Innovation and Infrastructure"

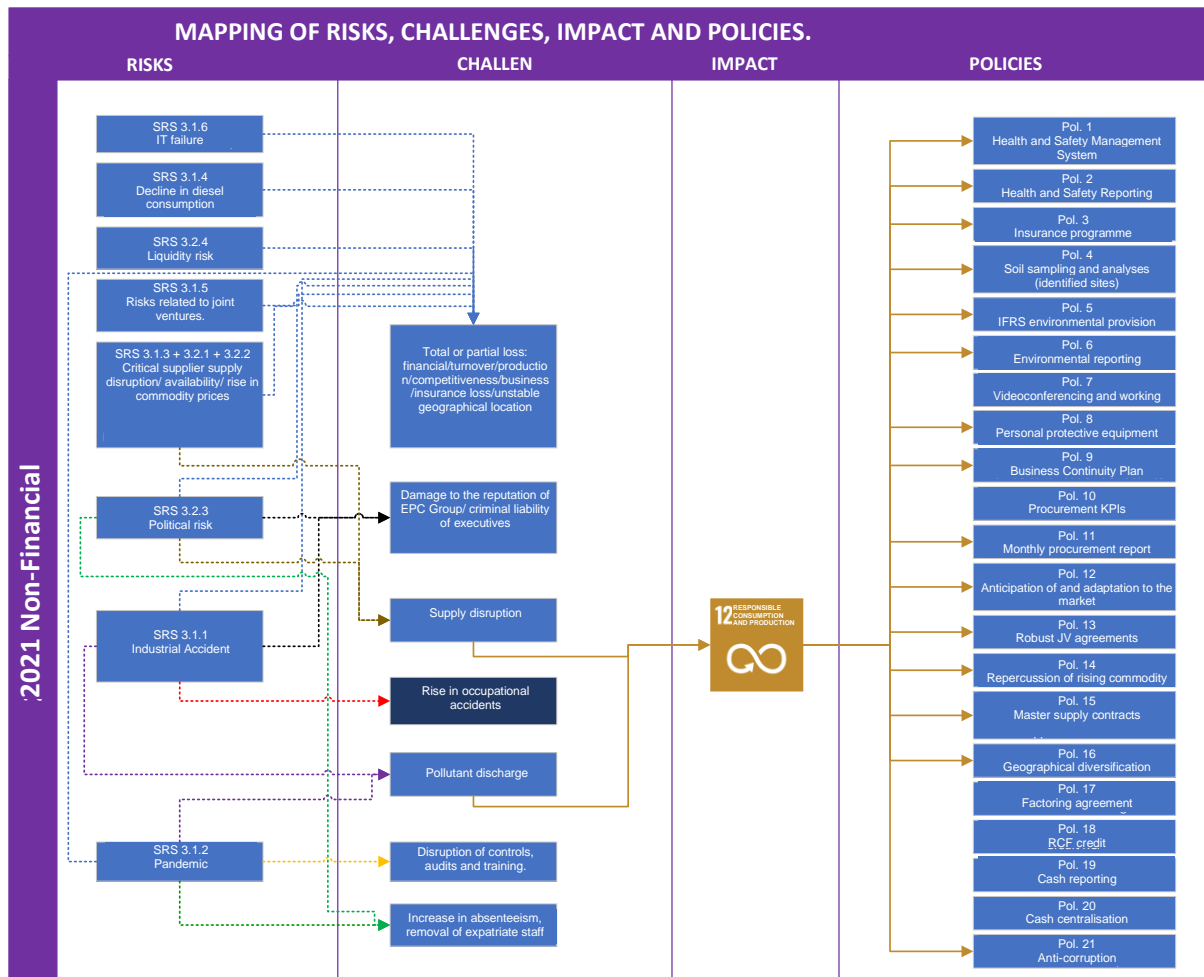


Assuming that we will use one of the four fundamental values of EPC Group (see paragraph 1.2) for each SDG associated with a type of impact.

In this case, the value mainly associated with SDG 9 - "industry, innovation and infrastructure" is the value: **"Respect our employees"**, which, by way of reminder, is achieved by: *"We value individual contributions and initiatives, creating an environment of trust. We also believe that major achievements are the result of teamwork. As such, we want to attract, develop and retain the best talent for our company, motivate our employees, encourage them to give their best and to be efficient and treat each person in line with the values of EPC Group."*

The policies associated with this type of impact are clearly identified in the diagram.

3.2.5 Mapping of risks, challenges and policies for their impact on SDG 12 "responsible consumption and production"

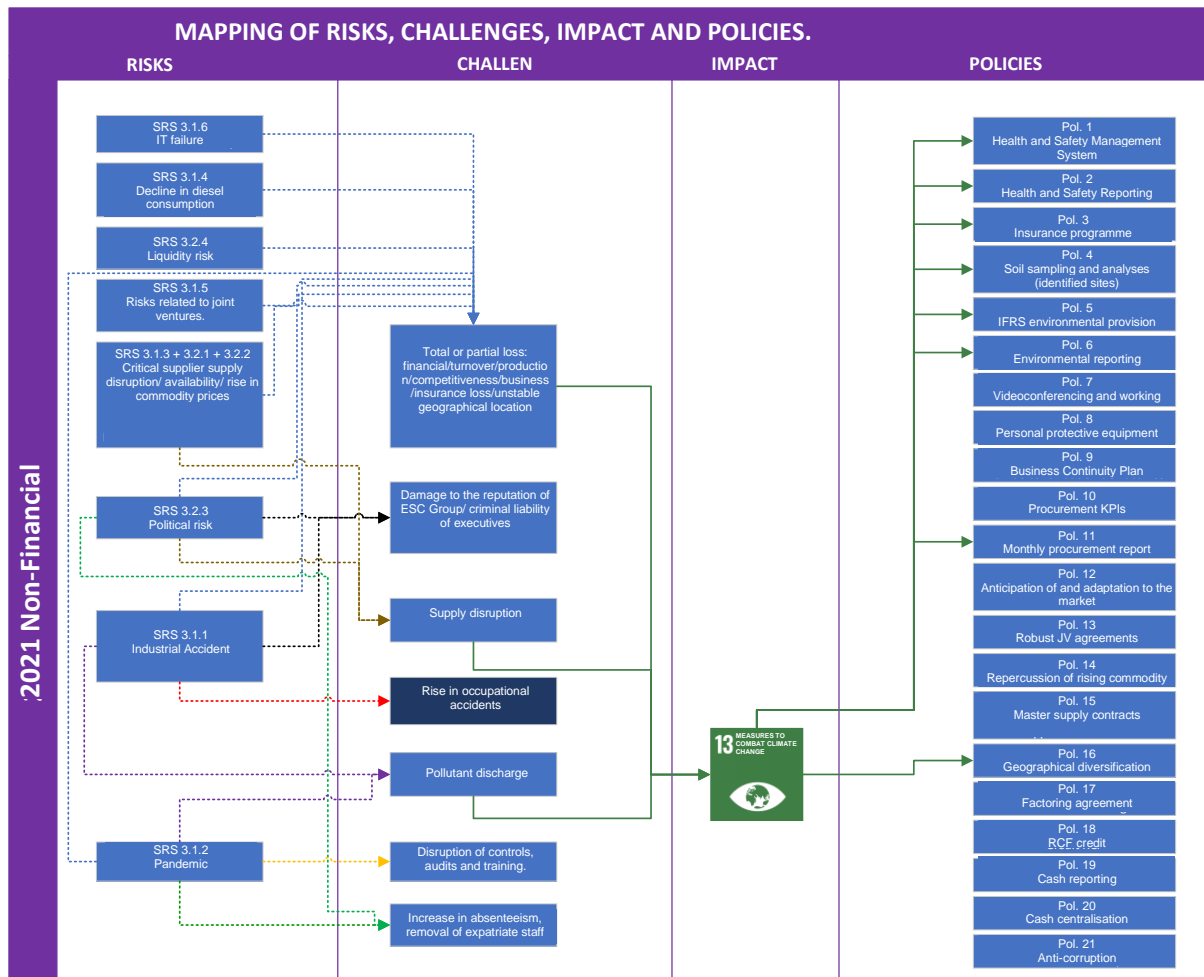


Assuming that we will use one of the four fundamental values of EPC Group (see paragraph 1.2) for each SDG associated with a type of impact.

In this case, the value mainly associated with SDG 12 - "responsible consumption and production" is the value: **"Respect for the environment"**, which, by way of reminder, is achieved by: *"We believe that society thrives through respect for individuals, communities and the environment; that is why we always act ethically by including social and environmental responsibility in our actions and decisions. We are committed to a sustainable, durable dynamic of adapting industrial tools, practices and products concerning innovation, performance and respect for the environment."*

The policies associated with this type of impact are clearly identified in the diagram.

3.2.6 Mapping of risks, challenges and policies for their impact on SDG 13 "Climate Change Measures"

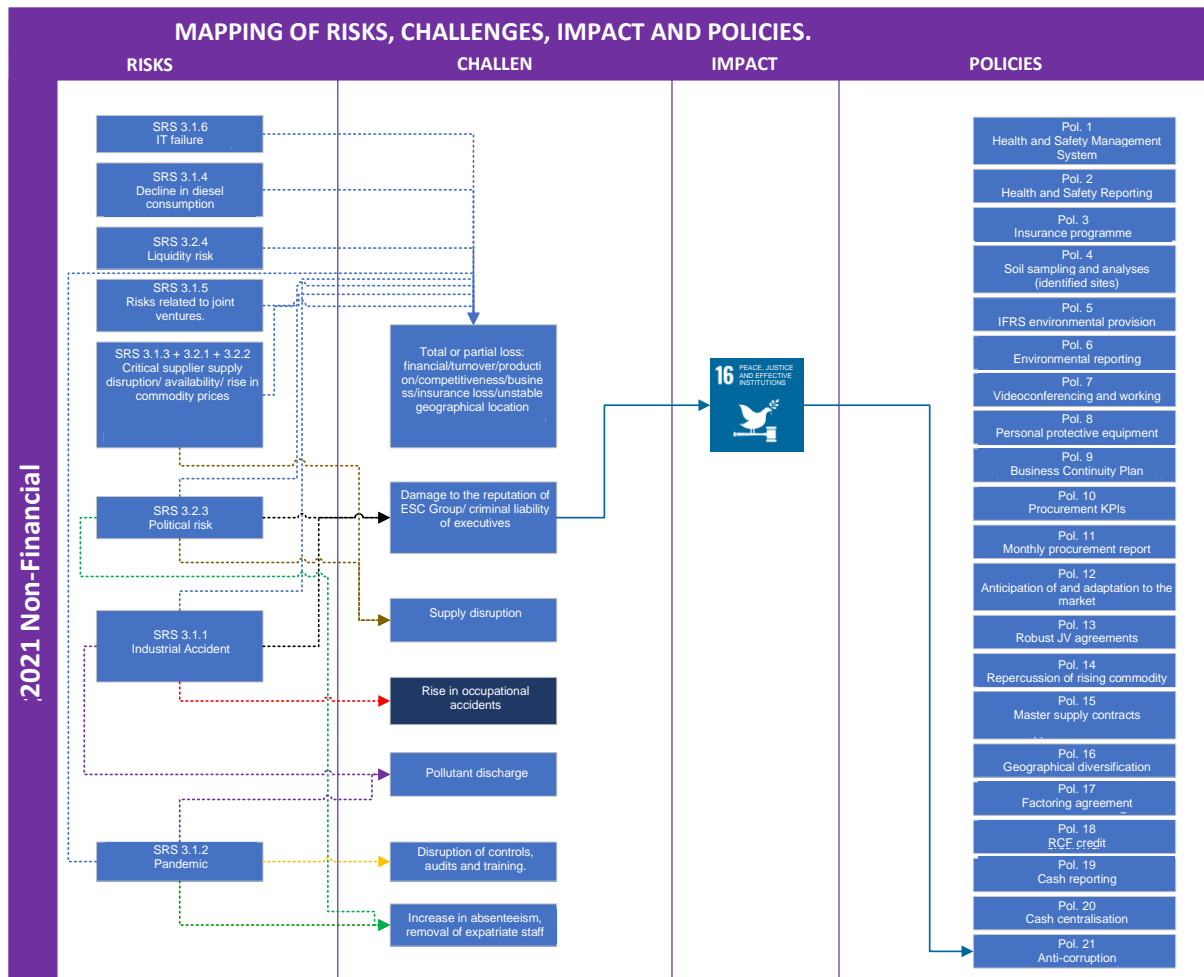


Assuming that we will use one of the four fundamental values of EPC Group (see paragraph 1.2) for each SDG associated with a type of impact.

In this case, the value mainly associated with SDG 13 - "Climate Change Measures" is the value: **"Respect for the environment"**, which, by way of reminder, is achieved by: *"We believe that society thrives through respect for individuals, communities and the environment; that is why we always act ethically by including social and environmental responsibility in our actions and decisions. We are committed to a sustainable, durable dynamic of adapting industrial tools, practices and products concerning innovation, performance and respect for the environment."*

The policies associated with this type of impact are clearly identified in the diagram.

3.2.7 Mapping of risks, challenges and policies for their impact on SDG 16 "Peace, Justice and Effective Institutions"



Assuming that we will use one of the four fundamental values of EPC Group (see paragraph 1.2) for each SDG associated with a type of impact.

In this case, the value mainly associated with SDG 16 - "Peace, Justice and Effective Institutions" is the value: **"Respect for the environment"**, which, by way of reminder, is achieved by: *"We believe that society thrives through respect for individuals, communities and the environment; that is why we always act ethically by including social and environmental responsibility in our actions and decisions. We are committed to a sustainable, durable dynamic of adapting industrial tools, practices and products concerning innovation, performance and respect for the environment."*

The policies associated with this type of impact are clearly identified in the diagram.

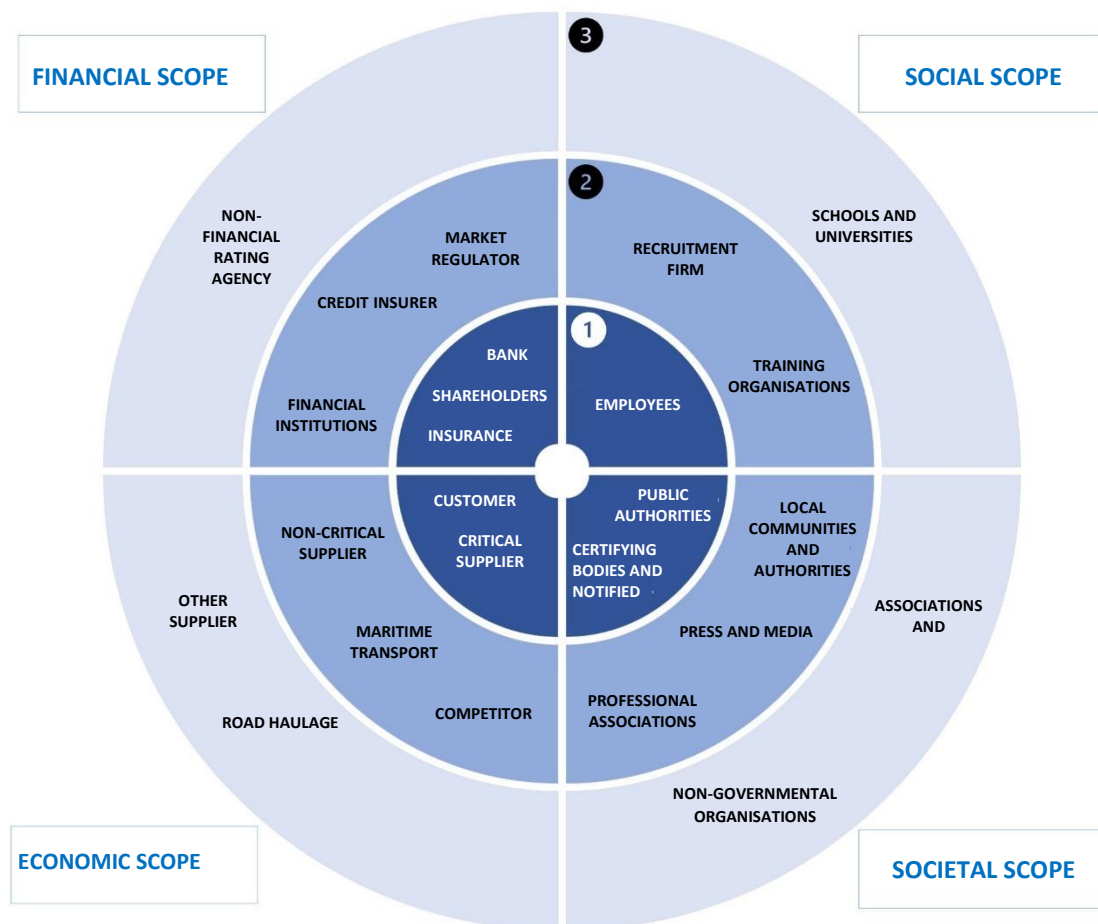
3.3 DESCRIPTION OF THE ECOSYSTEM: STAKEHOLDERS

The below diagram shows EPC Group's ecosystem.

Distinguishing the 4 main scopes of the most significant stakeholders with which EPC Group interacts, the scheme consists of three concentric levels, respectively referred to as "1", "2" and "3".

These three levels correspond to:

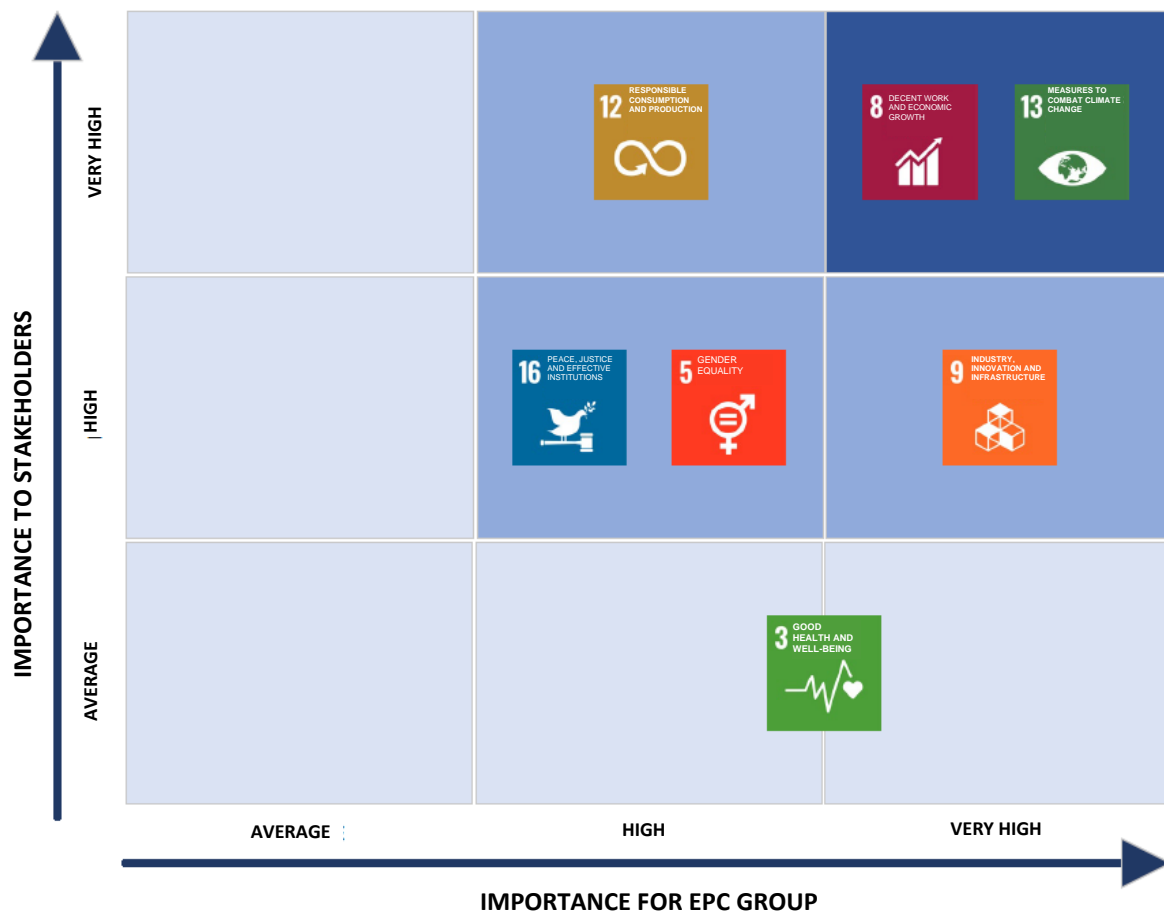
- ❖ Level 1 (the most central): the stakeholders vital to EPC Group's business;
- ❖ Level 2 (in the middle): stakeholders that have a major impact on EPC Group's core projects; and
- ❖ Level 3 (the most peripheral): stakeholders that have a significant impact on EPC Group's projects.



3.4 MATERIALITY GRID

In this 2021 Non-Financial Performance Statement, based on its knowledge of its stakeholders and the 's close relations the Group maintains with them, EPC Group has drawn up a simplified materiality matrix based on SDGs grouping impact types, as identified in the risk mapping process.

This exercise enables EPC Group to improve its understanding of action priorities using a twofold approach based on its own objectives and the expectations of stakeholders with which it interacts.



3.5 OBJECTIVES OF THE EUROPEAN GREEN TAXONOMY

The European Green Taxonomy primarily refers to European Regulation 2020/852 of 18 June 2020 *on the establishment of a framework to facilitate sustainable investment and amending Regulation (EU) 2019/2088*, Article 9 of which sets out six environmental objectives:

- ❖ Climate change mitigation;
- ❖ Climate change adaptation;
- ❖ The sustainable use and protection of water and marine resources;
- ❖ The transition to a circular economy;
- ❖ Pollution prevention and control;
- ❖ The protection and restoration of biodiversity and ecosystems.

Neither the delegated acts published on or after 4 June 2021 by the committee, nor the work of the Technical Experts Group appointed by the committee, make it possible to directly and indisputably link the activities of EPC Group to activities that substantially contribute to climate change mitigation and adaptation.

These same doctrinal elements likewise do not make it possible to link the activities of EPC Group to so-called "enabling" or "transitional" activities.

Due to the absence of eligible turnover, the capital expenditure (CAPEX) and operating expenditure (OPEX) associated with the main economic activities of EPC Group cannot be classified as eligible.

Thus, an analysis of the eligibility of CAPEX and OPEX was carried out separately.

Eligible CAPEX mainly concerns the acquisition of user rights relating to property leases and acquisitions of buildings/ structures. For 2021, the Group's total CAPEX amounted to €25.8 million and the eligible CAPEX ratio was less than 10% in 2021. With regard to eligibility, it has not been possible to carry out a technical analysis and the percentage of alignment would be less than the latter.

In accordance with the Taxonomy Regulation, OPEX mainly consists of research and development costs, rental expenses (non-capitalised), maintenance and repair expenses. Analyses conducted by EPC group have led to use of the exemption related to the non-materiality of OPEX according to the taxonomy definition for the financial year 2021.

Clearly, the deconstruction, decontamination and recycling activities of EPC Group's demolition division should be able to be classified as sustainable when more precise doctrinal elements are published, particularly with regard to their inclusion in the Extended Producer Responsibility (REP) system set up in France for *"construction products or materials in the building sector intended for households or professionals"*.

4 KEY PERFORMANCE INDICATORS

Indicators are presented in two separate groups:

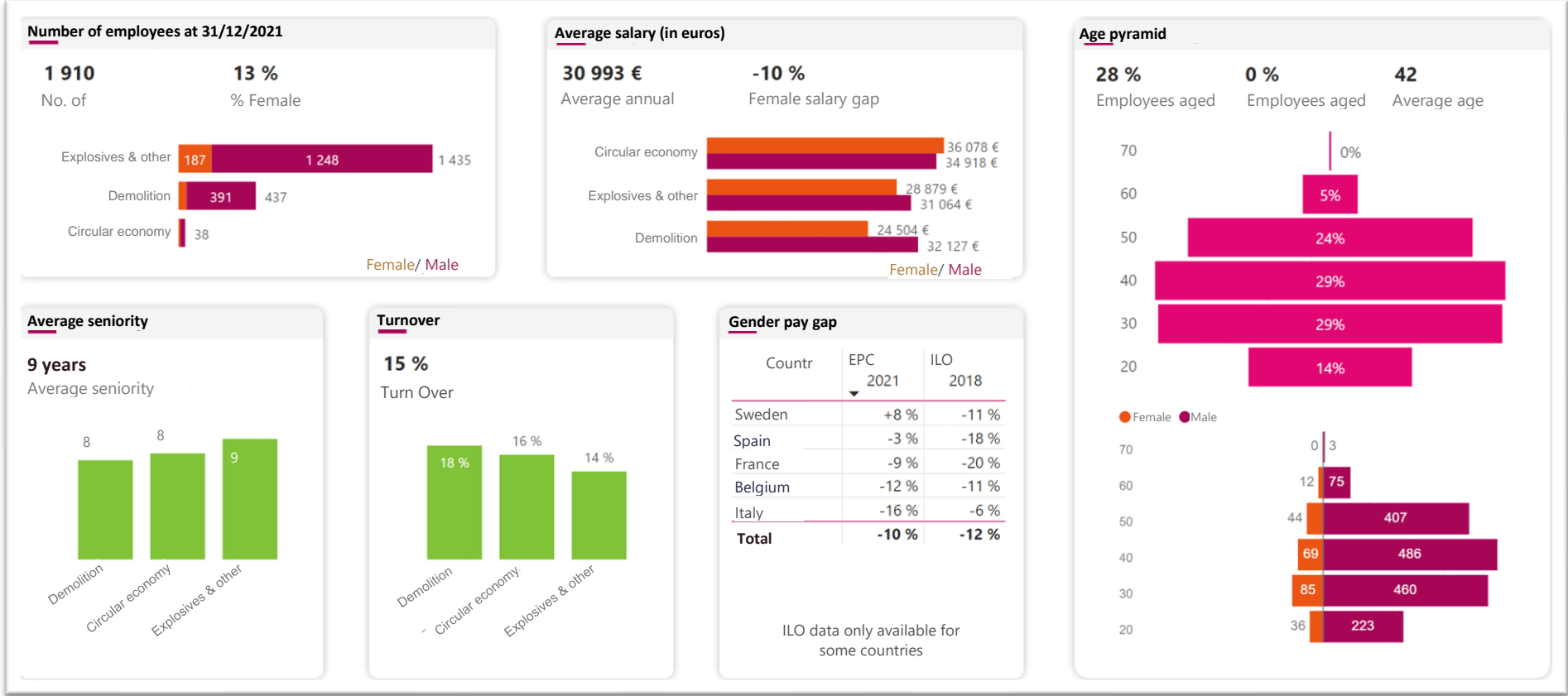
- ❖ Social indicators; and
- ❖ Environmental and societal indicators.

The indicators presented cover part of the policies cited in this 2021 Non-Financial Performance Statement, with other internal and unpublished indicators covering other policies.

The indicators are based:

- 1) For social indicators, on fully consolidated subsidiaries falling within the scope of this 2021 Non-Financial Performance Statement; and
- 2) For environmental indicators, on all fully consolidated subsidiaries, except for indicators that are the subject of the following legend, *"Indicators whose denominator only includes subsidiaries with an industrial and/or commercial activity"* which only take into account subsidiaries that are both fully integrated and which have an industrial and/ or commercial activity.

4.1 SOCIAL INDICATORS

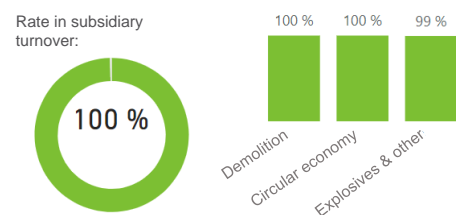
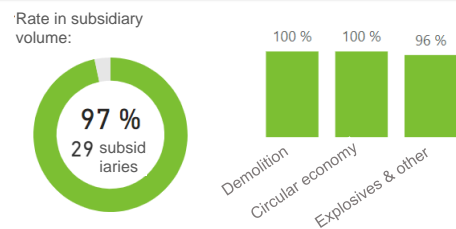


4.2 ENVIRONMENTAL AND SOCIETAL INDICATORS

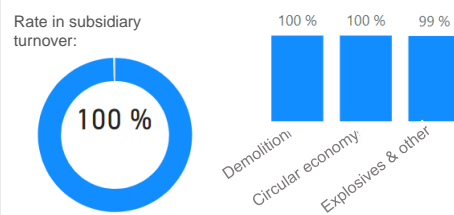
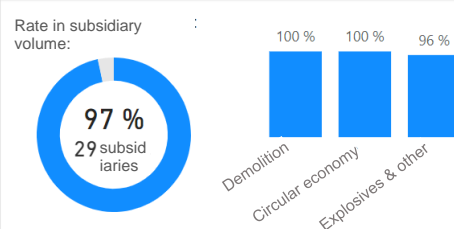


Indicators whose denominator only includes subsidiaries with an industrial and/or commercial activity

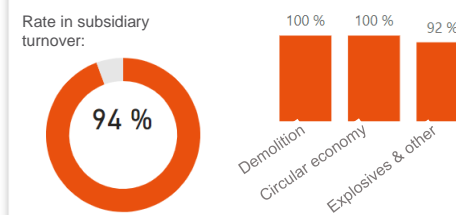
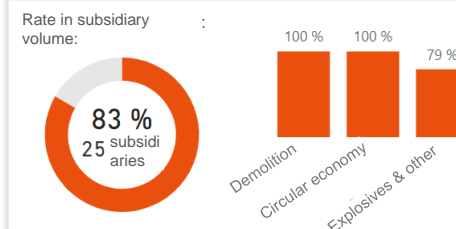
Subsidiaries that provide PPE to their employees



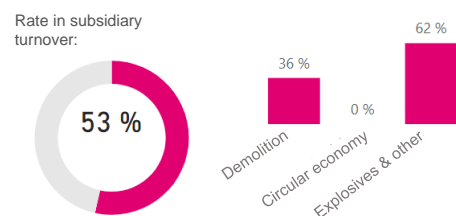
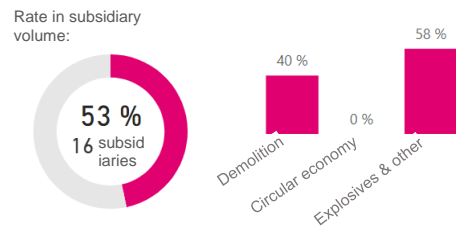
Subsidiaries that have safety



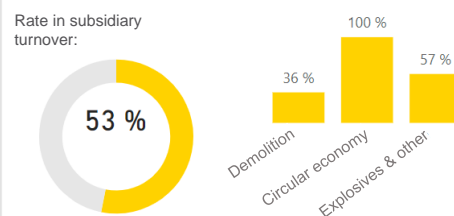
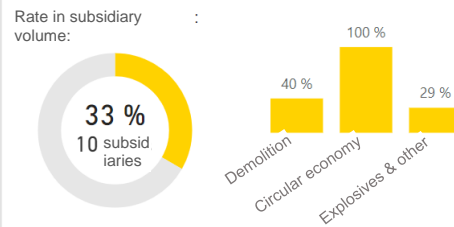
Subsidiaries that have an existing right of withdrawal for



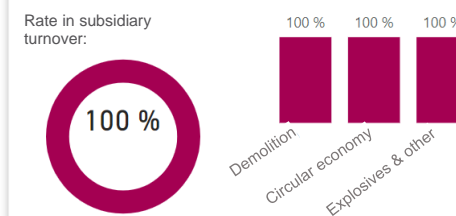
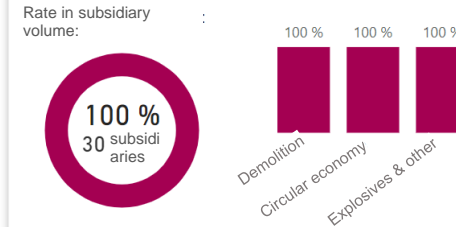
Subsidiaries that provide safety training to non-employees



Subsidiaries that have an environmental charter



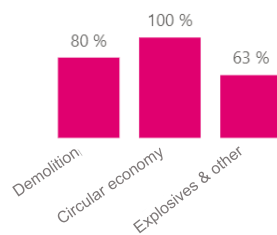
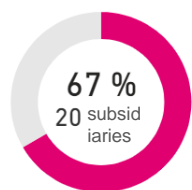
Subsidiaries that have no fines for environmental



Indicators whose denominator only includes subsidiaries with an industrial and/or commercial activity.

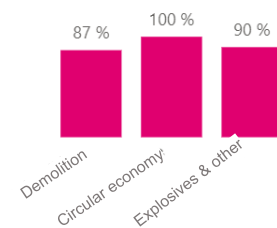
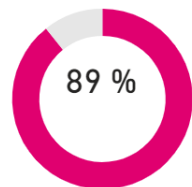
Subsidiaries that have an environmental study

Rate in subsidiary volume:



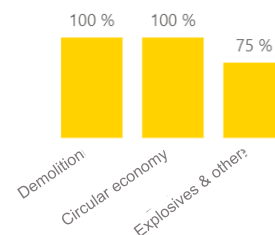
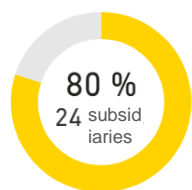
Length of audit: **27 months**

Rate in subsidiary turnover:

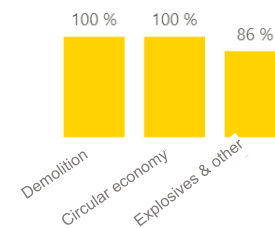
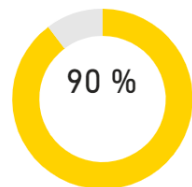


Subsidiaries that are members of national professional

Rate in subsidiary volume:

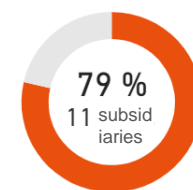


Rate in subsidiary turnover:

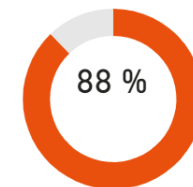


Subsidiaries that have a protection and alarm system

Rate in subsidiary volume:



Rate in subsidiary turnover:

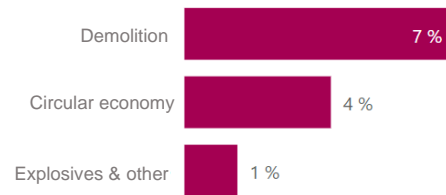


Indicators whose denominator only includes subsidiaries with an industrial and/or commercial activity.

Absenteeism rate

3 %

2021 result



Occupational accident frequency index

15

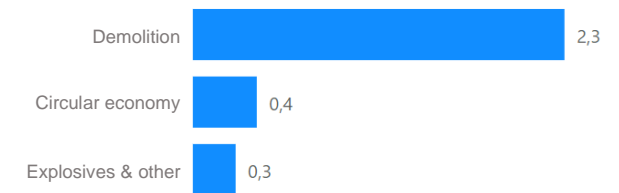
2021 result



Occupational accident severity index

0,7

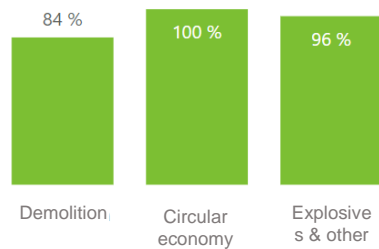
2021 result



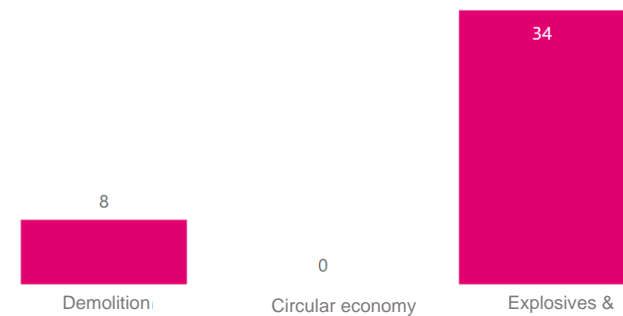
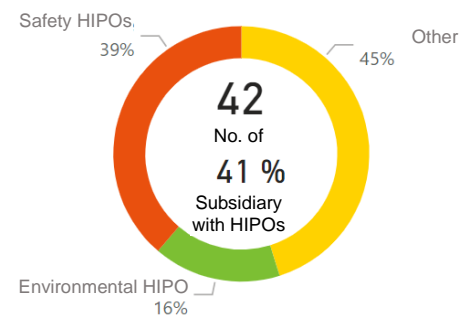
Percentage of employees of the same

93 %

2021 result

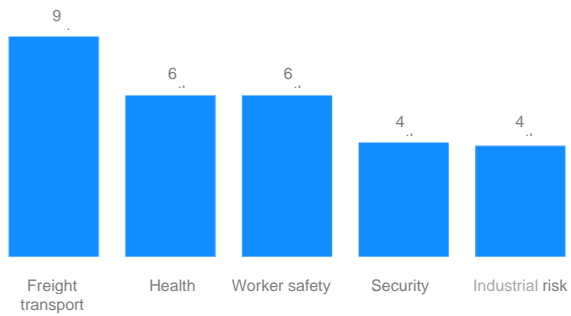


Number of HIPOs

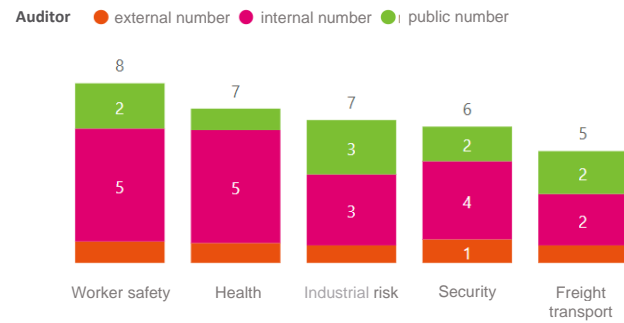


NOTE: HIPO: High Potential incident.

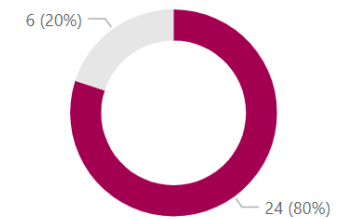
Length of audit by audit type



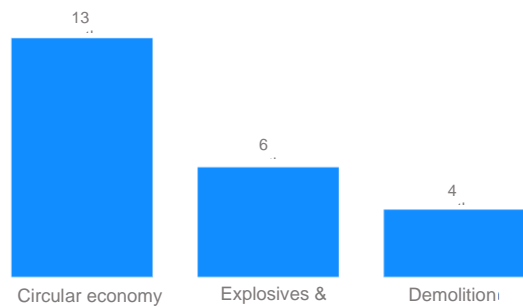
Average number of audits by audit type



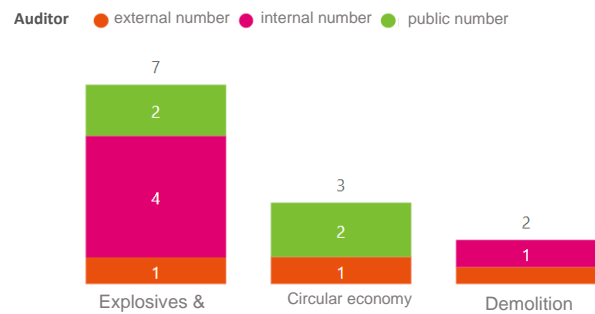
Number of subsidiaries subject to an audit



Length of audit per subsidiary



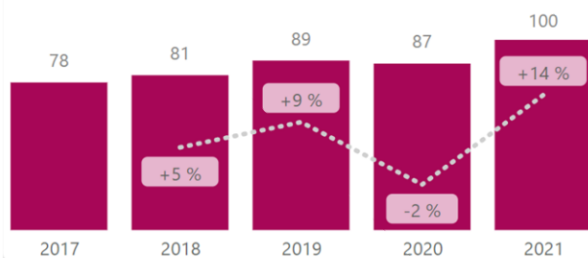
Average number of audits per subsidiary



Personnel expenses (based on 100 in 2021)

+14 %

VS 2020



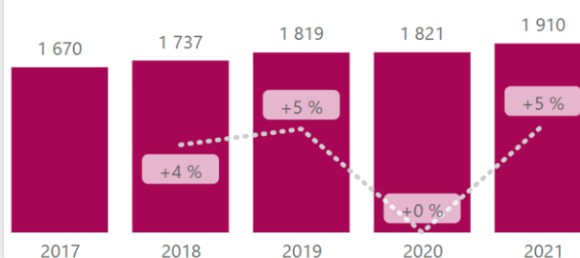
No. of employees (end of period)

1 910

Employee

+5 %

No. of BFC R/...



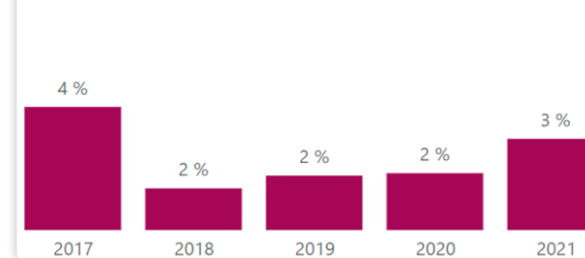
Absenteeism rate

3 %

2021

+1.2 pts

vs 2020



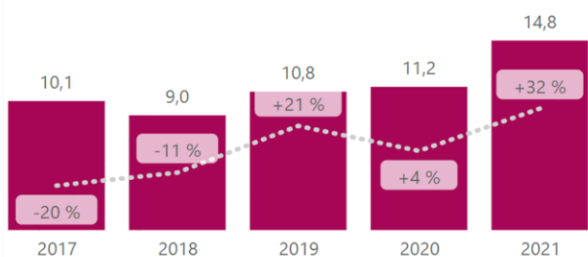
Occupational accident frequency index

15

2021

+32 %

vs 2020



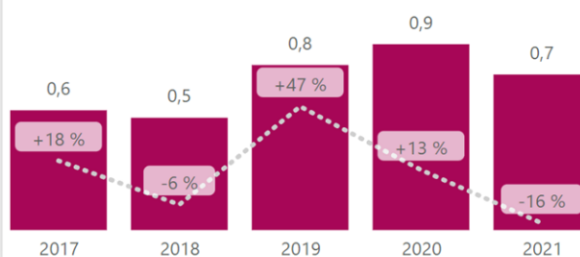
Occupational accident severity index

0,7

2021

-16 %

VS 2020



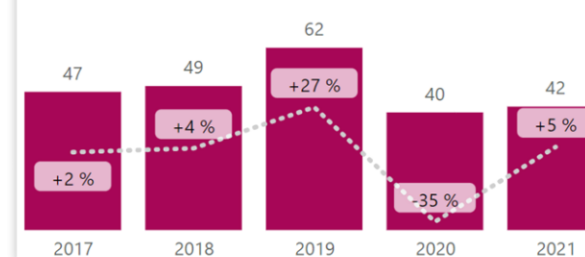
HIPO

42

2021

+5 %

vs 2020



5 2021 HIGHLIGHTS

5.1 HIGHLIGHTS AT EPC GROUP IN 2021: CALCULATION OF GREENHOUSE GAS FOOTPRINT BY EPC FRANCE

5.1.1 EPC France's Carbon Footprint:

Faced with the growing climate challenge and within the framework of the Paris agreements, which set ambitious targets to achieve carbon neutrality by 2050, EPC France has taken up the matter of its GHG (greenhouse gas) emissions, launching, in May 2021, on a voluntary basis (and without any regulatory constraints), an approach to assess its carbon footprint so as to be part of and contribute to the low-carbon strategy.

EPC France is therefore committed to pragmatic, proportionate but sustainable mobilisation with the following objectives:

- ❖ Identify the most impactful positions in an attempt to eliminate what may be or is part of a sustainable reduction approach.
- ❖ Identify contributions in its 6 strategic business areas (DAS1 to DAS6)
- ❖ Challenge its suppliers to select and favour those who are part of this reduction approach
- ❖ To be able to meet customer demands on its carbon footprint and support them by providing them with the best technology.

The aim is to be able to define the most relevant actions to reduce its emissions.

The approach was not imposed. However, it is necessary to anticipate future regulatory obligations in order to prepare for them calmly and to consolidate the Group's CSR approach by actively contributing to these.

Since the intended purpose is not strictly a response to a regulatory obligation, the choice was based on a comprehensive approach and therefore on 3 upstream and downstream scopes.

- ❖ Scope 1 = direct greenhouse gas emissions directly at company level
- ❖ Scope 2 = indirect emissions related to energy, mainly electricity and gas
- ❖ Scope 3 = other indirect emissions (upstream and downstream)

In order to gain the most complete and comprehensive vision possible with a recognised, reproducible approach. To guarantee professionalism and for an external expert view, EPC France has chosen the ADEME method; this method is used to carry out the Bilan Carbone® (2019). The chosen reference year is based on one full year untouched by the uncertainties of the COVID-19 pandemic, which largely disrupted 2020 and 2021. The method, resulting from the work done by ADEME, has been in place since 2004 and is constantly updated by the Bilan Carbone association.

The quantification method used is based on direct and indirect physical flows across all activities. The emission factors used reflect activity data on greenhouse gas emissions and come from the Carbone® database.

The CO₂ equivalent is the standardised and internationally recognised unit for greenhouse gas emissions used to carry out the Bilan Carbone®. It is measured in kilograms (kg). The results of this Bilan Carbone® are provided in tonnes of carbon dioxide equivalent, T CO₂e. EPC France has engaged the services of an "expert" firm for its external perspective, the transparency of its findings and conclusions, and above all, its recognised expertise. This firm already carries out the company's three-yearly energy surveys, having been working and in partnership with it for several years.

The consolidation method used is operational control in order to consolidate 100% of plant emissions.

5.1.2 Other actions contributing to the 6 environmental objectives

5.1.2.1 *Climate change mitigation: ESC France's trains of thought*

NASC tank agitators were removed following risk analysis. These agitators had a total power consumption of more than 8kW and had a long running time.

Steam generation: To keep certain equipment in good condition with a combustion efficiency maintained at more than 92%, economisers have been installed to recover the calories contained in combustion fumes.

Steam distribution: The thermal insulation of the steam network is complete and no leaks have been detected. Insulated mattresses complement the system.

Cold generation: The plate exchanger for cooling the matrix, originating from the PRESSI workshop, was removed, as was the dedicated cold unit (49 kW). This resizing of cooling requirements has resulted in energy gains and, above all, enabled the recovery of heat, which is used to preheat the condensates from NASC's water circuit prior to its injection into the aqueous solution.

The chosen refrigerant fluid has a very low impact of GHG emissions.

Compressed air: An R55-75N VSD compressor has been added to replace the old compressor. The facility is equipped with an absorption dryer, which is more energy-efficient than refrigeration dryers. In addition, as the new compressor has a variable speed, it has an improved level of energy performance.

The total capacity of compressed air production systems has been resized and adapted to requirements. In addition, the installation of equipment with variable speed makes it possible to adopt a useful load rate for the equipment.

5.1.2.2 Adaptation to climate change

Cold regulation: The new chilled water production equipment is satisfactorily regulated. The installation is equipped with an electronic pressure regulator, allowing its high-pressure setting to be adjusted according to external weather conditions.

5.1.2.3 Sustainable use of water and marine resources

Cooling system: Circulation of water in closed circuit with the aim of cooling NASC's steam without excessive consumption.

5.1.2.4 Circular economy

Recycling: Development of a rehabilitation workshop to recycle the product (MATRICE) in the parent production unit - product previously destined for waste disposal.

5.1.2.5 Pollution prevention

Pollution control system: Retentions adapted to stored volumes, anti-spreading manhole covers, anti-pollution kits, installation at all our sludge/oil separator discharge points. The last was installed in 2021.

A 6-month analysis campaign carried out by an accredited external organisation has enabled us to demonstrate that our discharges are far below the limits imposed by regulations and ensure that we monitor our discharges on an ongoing basis.

Off-ground burning platform: For the burning of pyrotechnical waste, work spaces have been set up to avoid soil pollution.

5.1.2.6 Healthy ecosystem

Water Pretreatment Systems: 4 Oil/Sludge separators in place on-site (the last was installed in 2021).

Recovery of unburnt residues: After each burning operation, sludge is collected to avoid infiltration and leaching into soil.

5.2 HIGHLIGHTS AT EPC GROUP IN 2021: THE PROJECT TO DEMOLISH FOUR TOWER BLOCKS IN THE BALZAC DISTRICT IN SAINT BRIEUC BY OCCAMAT.

Demolition of four tower blocks in the BALZAC district
 Project Owner: TERRE & BAIE HABITAT

OCCAMAT
CIRCULAR ECONOMY

ST BRIEUC(22)

Description of operations

This work to demolish a set of four tower blocks in the Balzac district in St Brieuc (279 housing units) is part of the agreement for urban renovation in the conurbation of Saint-Brieuc, particularly in the Balzac - Place de la Cité districts, and demolition works are planned as part of PNRU 2.

There are high expectations regarding the management objectives of construction sites in the area, whether from an environmental aspect (waste management, reuse, sorting and recovery) or from the aspect of low impact on local residents (flow management, limitation of nuisances, communication with local residents). The project owner aims to use this operation as a springboard for waste management and recovery, and wants the company to fully adhere to its environmental ambitions.

As such, it is supported by the Re-use Project Assistant Bati Récup, which is a growing player in Brittany.

This operation is part of a broader policy framework for changes to the anti-waste law for a circular economy with an increase in the General Tax on Polluting Activities (TGAP) in 2021 and, more broadly, with the recognition that tomorrow's resources come from today's waste.

As part of this approach, OCCAMAT has selectively removed targeted materials for reuse, collection, packaging and storage on site in a dedicated re-use area. The first phase of the work was carried out in two stages in 2021.

The operation in figures

| | | | |
|---|------------------------|--------------------------------|------------------|
| Turnover (excl. tax) | €1,630,077 | | |
| Waste tonnage generated by the construction site (excluding inert material) | 1290 tonnes | Recovery rate | 93% |
| Volume of materials saved from skips | 60m³ | Number of hours' labour | 652 hours |



OCCAMAT

www.epc-groupe.com

Misengrain - NOYANT-LA-GRAVOYERE
 49520 SEGRE-EN-ANJOU-BLEU - France
www.occamat-demolition.fr

5.3 HIGHLIGHTS AT EPC GROUP IN 2021: THE MAJOR RENOVATION PROJECT CONCERNING THE CENTRE NATIONAL DES ARTS PLASTIQUES BY ATD.




CIRCULAR ECONOMY

Project Owner:



PANTIN (93)

Description of operations

Major renovation of CNAP - Centre National des Arts Plastique - to accommodate offices, storerooms and installation of Mobilier National storerooms.

ATD has carried out all the preliminary work of cleaning, asbestos removal and lead removal on all floors of the existing building, and the demolition of the former office façade, the old accommodation building, and the unloading docks.

This operation is also part of the environmental issues taken on by OPPIC in terms of the recovery and reuse of project materials.

Due to established resource diagnostics, these are mainly false floor tiles, but also carpet tiles, floor boards, false ceiling tiles, insulation materials, doors, metal partitions, and blinds, which have been re-used on other sites or recovered in other sectors.

After 9 months of work for the ATD teams, renovation of the existing building, new construction and landscape treatment began. This second phase of work is scheduled to last an estimated 26 months.

The operation in figures

| | | | |
|--|-------------------|-------------------------|-------------|
| Turnover (excl. tax) | €1,360,000 | | |
| Waste tonnage generated by the construction site | 250 tonnes | Recovery rate | 85% |
| Volume of materials saved from skips | 210m ³ | Number of hours' labour | 3,710 hours |



ATD

www.epogroupe.com

Rue du Manoir Queval
76143 Petit-Quevilly Cedex-France
www.atd-demolition.fr



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5.4 SPECIFIC INDICATORS FOR 2021:

