acolad.

ESG Report 2025

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INTRODUCTION

Since its creation in 1995, Acolad Group has been dedicated to bridging languages and cultures by connecting people and businesses through content. As a global leader in content and language solutions, Acolad supports organisations in communicating effectively across borders, combining human expertise with innovative digital solutions to deliver translation, localisation, interpretation, and content services tailored to every need.

With a mission to make information and communication accessible to all, Acolad plays a key role in enabling global collaboration and inclusion. Its services contribute to social and economic development by supporting sectors such as life sciences, the public sector, legal, finance, and technology, helping organisations share knowledge, ensure compliance, and reach diverse audiences worldwide.

Acolad continually adapts to evolving technological, societal, and environmental trends, integrating sustainability into the heart of its business model. The Group leverages its expertise in digital innovation and linguistic intelligence to enhance operational efficiency while reducing its environmental footprint.

Acolad's sustainability strategy is embedded within its broader corporate responsibility framework and aligned with international standards and initiatives, including the United Nations Global Compact, the Sustainable Development Goals (SDGs), and the Science Based Targets initiative (SBTi), to which the Group made its commitment in 2024. This approach reflects Acolad's ambition to grow responsibly, support global climate and social objectives, and create long-term value for all its stakeholders.

The Group's sustainability approach is structured around three key priorities:

- **Social**: fostering inclusion, learning, and well-being across a diverse global workforce.
- **Environmental**: protecting the environment and advancing towards carbon neutrality.
- **Governance**: driving innovation and sustainable growth through ethical and responsible business practices in the value chain.

ESG REPORT

The ESG report (or sustainability statement) is prepared in accordance with Directive 2022/2464 of the European Parliament and of the Council of 14 December 2022 and Ordinance No. 2023-1142 of 6 December 2023 on the publication and certification of sustainability information and the environmental, social and corporate governance obligations of commercial companies. It is also based on and complies with the provisions of Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023 (European ESG reporting Standard or ESRS). Although Acolad is not subject to mandatory CSRD reporting, the Group has elected to publish its CSRD report on a voluntary basis and has opted not to apply the EU Taxonomy Regulation in this reporting cycle.

In this voluntary ESG report, certain interpretations, estimates, and methodological uncertainties may exist, particularly given the evolving regulatory framework and the limited availability of consistent market benchmarks. Acolad has nevertheless endeavored to apply the ESRS principles and best practice guidelines currently available.

Due to the difficulties in accessing certain data, particularly within the value chain, to establish Scope 3 greenhouse gas emissions, for which estimates and uncertainties are subject to the variability and quality of the various input data and the methodological assumptions used, Acolad has made use of assumptions, estimates and assessments (see section 1.1.2).

These various assumptions and estimates may be refined as the quality of available data improves.

In addition, all quantitative metrics have been determined on the basis of the same scope as that used for financial consolidation.

Acolad submitted its commitment to the Science Based Targets initiative (SBTi) in 2024, with the validation of near-term targets expected by 2026. The Group is also developing its decarbonisation roadmap to define absolute reduction targets and key levers in 2026.

1 General Disclosures (ESRS 2)

Acolad's strategy, purpose and corporate responsibility commitments are closely linked. With a forward-thinking and agile mindset, the Group anticipates trends and drives innovation to meet the evolving needs of a world in digital transformation.

Guided by its values of openness, reliability and excellence, Acolad strives to balance business growth, environmental responsibility and social progress, creating connections that empower understanding and sustainable development.

1.1 Basis for preparation

1.1.1 General basis for preparation of sustainability statements (BP-1)

Consolidation scope

The scope of Acolad Group's ESG reporting is aligned with the scope of the Group's financial statements. The ESG report therefore ensures coverage of material impacts, risks, and opportunities across the Group.

Social /People pillar

The scope used for own workforce reporting (S1-5) is exactly the same as the scope of financial consolidation.

The scope used for reporting on the Group's own workforce corresponds to the full financial consolidation scope, encompassing all subsidiaries and entities integrated into Acolad's human resources information and management systems. This ensures consistency and reliability of social indicators across the organization.

Environmental and governance pillar

Environmental and governance data are consolidated on the same basis as financial statements.

Value chain and challenges

Acolad's upstream value chain, including tier-one suppliers, own operations, and the downstream value chain, encompassing corporate clients, public sector, and end users, are taken into account in the Scope 3 emissions metric in section 2.1.

With regard to policies and action plans, the parts of the value chain concerned are as follows:

Value chain	Scope within the framework of this ESG report	Acolad issue	ESRS and section of this report
Upstream	Tier-one suppliers	• Sustainable, responsible and ethical practices in the supply chain	• ESRS S2 (section 3.2) • ESRS G1 (section 4.1.7)
Downstream	Corporate clients, public sectors and end-users	• Personal data management and security	• ESRS S4 (section 3.3.3)

For a better understanding of Acolad's value chain, please also refer to section 1.3.1.

1.1.2 Disclosures in relation to specific circumstances (BP-2)

The ESG report (or sustainability statement) is prepared in accordance with Directive 2022/2464 of the European Parliament and of the Council of 14 December 2022 and Ordinance No. 2023-1142 of 6 December 2023 on the publication and certification of sustainability information and the environmental, social and corporate governance obligations of commercial companies. It is also based on and complies with the provisions of Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023 (European ESG reporting Standard or ESRS). For this reporting year, Acolad has applied the phased-in provisions for ESRS 2 SBM-1 §38(b) on the breakdown of total revenue by significant ESRS sectors, ESRS E1-9 on anticipated financial effects, and ESRS S1-7 on the characteristics of non-employee workers.

Time horizons

The time horizons selected are short, medium and long term, depending on the IROs (Impacts, Risks and Opportunities) on the same time horizon as defined by ESRS 1:

- the short-term horizon corresponds to the reporting period
- the medium-term horizon up to five years
- and the long-term horizon more than five years, with the exception of climate-related issues, for which the medium- term horizon is 2030 and the long-term horizon is 2050.

Value chain estimation

The Group's CO2eq emissions are calculated according to the rules defined by the GHG Protocol and monitored using the market-based carbon emissions indicator. Emission factors are derived from recognized databases such as the IEA, ADEME or DEFRA data. Whenever possible, local emission factors are used. With regard to Scope 3 CO2eq emissions, part of supplier expenditure is estimated on the basis of consolidated monetary information taken from the Group purchasing system. This information represents 53% of Scope 3.

Sources of estimation and outcome uncertainty

The sources of estimation and outcome uncertainty relate mainly to the quantitative environmental metrics listed below:

- Scope 1 and 2: when invoices concerning building energy consumption are not available on the reporting date (for example, when energy charges are included in rent or due to late invoicing), and for offices or other tertiary sites that are located in coworking spaces, operating entities calculate the associated energy-related CO_2 emissions based on the average number of employees regularly on site, the surface area, and the national electricity grid emission factors, using the calculating tool.
- Scope 3: wherever possible, Acolad uses physical data (e.g. for category 3.1 Goods and services or 3.2. New property leases/new IT equipment/new fleet vehicles or 3.6 Business travel). When this data is not available, Acolad uses monetary data from the finance teams' system for entities included in the financial and accounting tool's scope.
- Scope 3: Emissions related to linguist vendors are estimated using industry averages due to the absence of supplier-specific carbon data. Calculations are based on sector productivity indicators such as average word volumes translated per day and typical pay rates for translation and interpretation work. These estimates incorporate variations in vendor practices and geographical locations.

1.2 Governance

1.2.1 The role of the administrative, management and supervisory bodies (GOV-1)

Composition, diversity and expertise of the Board of Directors and the Group Executive Committee

Operational governance

The Group's executive management is composed of eight members: the Chief Executive Officer, Chief Financial Officer, Chief Information Officer, Chief Technology Officer, Chief People and Culture Officer, Chief Revenue Officer, Senior Executive Vice President Nordics, NL, DACH, ASE, and Senior Executive Vice President US. These leaders hold active responsibilities for managing Acolad's operations, strategy, and decision-making at the global level.

Acolad's Management Board brings together extensive and complementary expertise in areas directly related to the Group's core business, including language and content services, technology, digital transformation, and people management. The team collectively combines strong experience across multinational environments, with backgrounds in industries such as technology, professional services, e-commerce, and finance. This diversity of experience supports agile decision-making and the integration of sustainability principles into corporate strategy.

Supervisory governance

The Supervisory Board comprises representatives from the Group's principal investment partners. The Board provides strategic oversight and financial governance, ensuring transparency, long-term value creation, and responsible growth. Its members bring expertise in private equity, mergers and acquisitions, and corporate development, contributing to the Group's international expansion, digitalisation, and transformation initiatives.

This combination of operational leadership and supervisory oversight ensures that Acolad's governance structure effectively aligns business performance, technological innovation, and sustainability objectives to deliver long-term value for all stakeholders.

1.2.2 Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies (GOV-2)

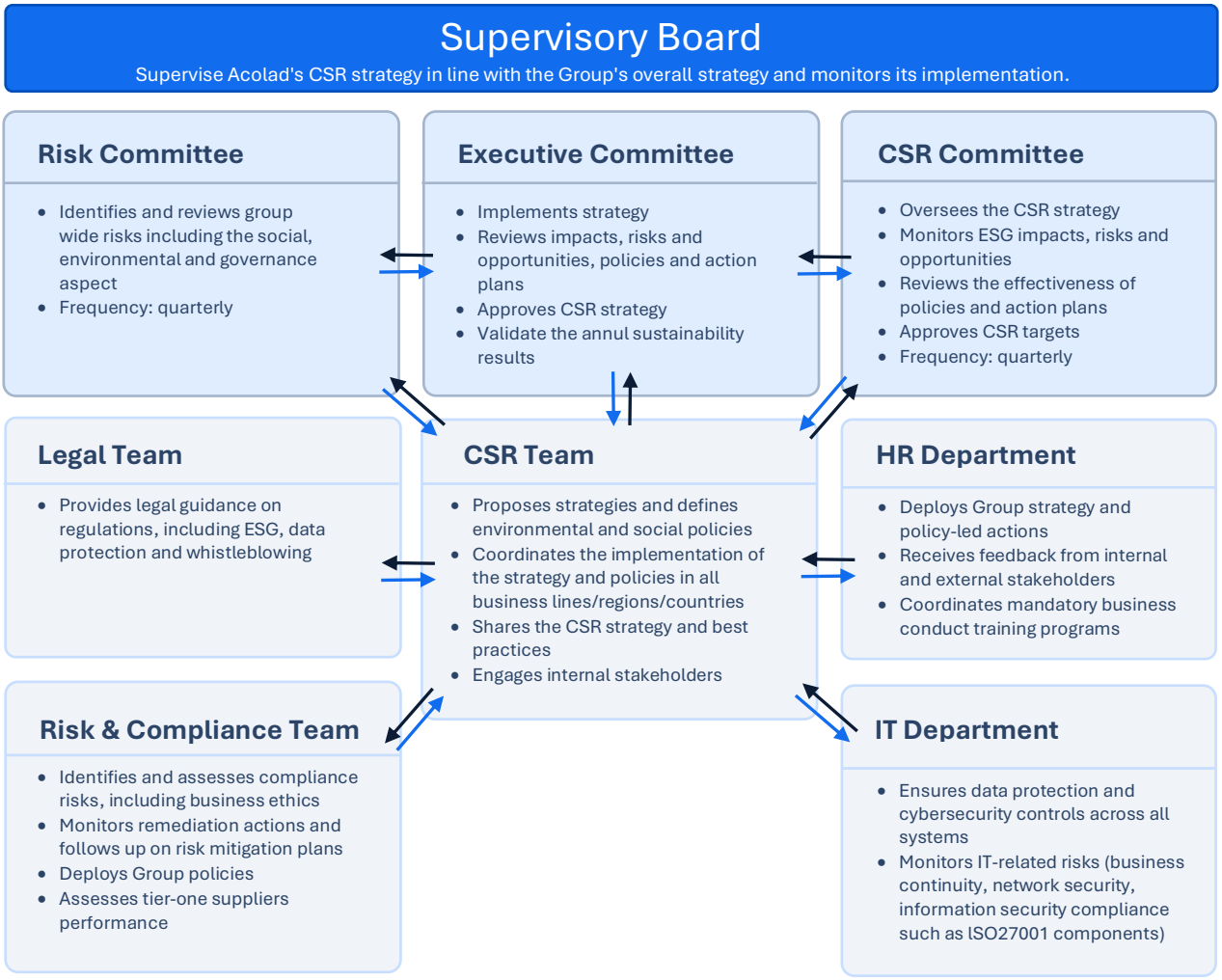
Acolad integrates sustainability topics into its overall management and decision-making processes. Each year, the Chief Executive Officer, the Supervisory Board and the Acolad operational management board determine Acolad's business orientations, taking into account matters associated with climate change and sustainable development. The governance framework for sustainability includes the CSR Committee and the CSR Management Function, both reported to the Chief Information Officer and linked to the Executive Committee. The CSR Manager reports on sustainability-related activities to the Chief Information Officer, who in turn reports to the Acolad operational management board on a regular basis. The CSR team also works closely with the Risk Committee, composed of several members of the Acolad operational management board of directors.

The CSR Committee has a cross-functional role and includes leaders or representatives from Human Resources, Resource Management, Information Technology, Business Operations, Legal and Risk and Compliance. It is chaired by the CIO and coordinated by the CSR Manager. The Committee reviews sustainability priorities, monitors the progress of related projects, and ensures that decisions on environmental, social, and governance (ESG) topics are consistent with Acolad's strategic and operational objectives. It also supports coordination between departments and ensures that sustainability indicators are reviewed and reported to the Acolad operational management board when relevant.

The CSR Manager oversees the day-to-day implementation of Acolad's sustainability activities. This role includes coordinating internal stakeholders, identifying and assessing ESG-related risks and opportunities, and maintaining consistency between the Group's CSR Policy and its business strategy. The CSR Manager is responsible for consolidating data and preparing ESG disclosures across key frameworks.

Sustainability topics are discussed quarterly within the CSR Committee meetings ensuring that progress on key actions and performance indicators is systematically reviewed to ensure optimal network management. The CSR team and the Risk and Compliance team jointly monitor environmental, social, and governance-related risks and opportunities. Their analyses are reported to the CIO and presented to the Acolad operational management board to support strategic decisions. The Legal team, reporting to the Chief Financial Officer, monitors compliance and contractual risks to ensure alignment with corporate governance and financial integrity.

Performance reviews are conducted annually at both group and regional levels, focusing on the Group's CSR objectives and progress. Three of these performance criteria are directly linked to the long-term performance targets set by the shareholders and the Supervisory Board. These key indicators are monitored jointly by the Human Resources, CSR, and Information Security teams across Acolad's value chain to ensure alignment between sustainability priorities, organisational performance, and compliance objectives.



1.2.3 Integration of sustainability-related performance in incentive schemes (GOV-3)

Acolad's compensation policy for corporate officers is part of the Group's overall growth strategy. The current strategic plan aims to leverage Acolad's business model and operational strengths to achieve profitable and sustainable growth over the coming years. At this stage, the Group has not yet introduced incentive schemes or remuneration components directly linked to sustainability matters for its administrative, management, or supervisory bodies. However, the Supervisory Board and shareholders have identified several key performance indicators in the environmental, social, and governance (ESG) areas that are monitored as part of Acolad's broader corporate performance objectives. Some of these ESG indicators are also linked to the Group's corporate financing structure and loan agreements, reflecting the growing importance of sustainability in Acolad's overall performance management.

Acolad recognises the relevance of integrating sustainability performance into remuneration mechanisms to strengthen accountability and align management objectives with long-term value creation. The Group therefore intends to progressively incorporate sustainability-related performance criteria into its variable compensation framework within the next two years. This development will form part of the Group's broader Corporate Social Responsibility and will contribute to embedding sustainability more deeply into Acolad's governance and performance culture.

1.2.4 Statement on due diligence (GOV-4)

Sustainable development is an integral part of Acolad's strategy. To this end, the Group has put in place appropriate monitoring processes, the main elements of which are set out in the ESG report below:

Core elements of due diligence	Sections of the ESG report
Embedding due diligence in governance, strategy and business model	• Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies ESRS 2 GOV-2, section 1.2.2 of this report) • Material impacts, risks and opportunities and their interaction with strategy and business model (ESRS 2 SBM-3, shown at the start of each topical section)
Engaging with affected stakeholders in all key steps of the due diligence	• Interests and views of stakeholders (ESRS 2 SBM-2, section 1.3.2 of this report and section 1.4.2)
Identifying and assessing adverse impacts	• Description of the processes to identify and assess material impacts, risks and opportunities (ESRS 2 lRO-1, section 1.4.1 of this report)
Taking actions to address those adverse impacts	• Actions described under each topical ESRS
Tracking the effectiveness of these efforts and communicating	• Targets described under each topical ESRS

1.2.5 Risk management and internal controls over ESG reporting (GOV-5)

The internal control and risk management processes applied to ESG reporting cover all Acolad Group entities and subsidiaries. These processes apply to environmental indicators such as energy and GHG emissions; social indicators such as employees, training, and diversity; and governance indicators including ethics and compliance. The control framework spans the entire data lifecycle, from collection and validation to consolidation and reporting, and includes information provided by suppliers and linguist vendors. ESG reporting is integrated into the Group's overall internal digital system, with clearly defined roles and responsibilities for data owners, reviewers, and approvers at both local and Group levels.

The Group's CSR policy is defined and implemented by the CSR team, which serves as a key component of the internal control system for non-financial risks. The team defines the non-financial performance metrics to be reported by the Group, provides methodological guidance, and verifies that the documentation submitted by reporting entities is complete and accurate. This multi-level control process helps ensure that non-financial data are consistent, comparable, and aligned with internal and external reporting requirements.

In 2025, additional resources were allocated to the CSR team to adopt a dedicated digital platform designed to strengthen data collection, harmonise methodologies, and coordinate ESG reporting across all entities. This platform supports greenhouse gas (GHG) footprint assessment, CSRD reporting, and data consolidation processes. It provides a structured workflow that defines roles for data contributors, owners, reviewers, and validators, ensuring traceability and accountability at each stage of the reporting process. The platform also facilitates internal and external reviews, contributing to improved data transparency, consistency, and audit readiness across the Group.

All reported sustainability data undergo validation at multiple stages within the reporting platform, combined with manual consistency reviews, ensure that data are complete, reliable, and accurate. Key risks identified in relation to ESG reporting include data completeness, estimation uncertainty, supplier data availability, and data integrity. These risks are assessed through cross-functional reviews, analysis of historical data, and supplier questionnaires. Specific control measures have been implemented, including centralised completeness checks, dual validation by local and Group reviewers, and the use of standardised estimation methodologies reviewed and approved by the CSR team.

Findings from internal control activities and risk assessments are used to strengthen Acolad's ESG reporting framework. Identified gaps lead to updates in data collection procedures, improvements in validation process, and clarification of roles and responsibilities. The results of these reviews are shared with relevant departments to enhance accountability, guide employee training, and improve coordination between teams involved in sustainability data management.

High-priority findings are reviewed by the CSR Committee, which monitors the implementation of corrective actions and process improvements. The CSR team consolidates outcomes and reports them to senior management, ensuring that risks, control effectiveness, and process enhancements are regularly reviewed. This ongoing oversight allows the Group to integrate lessons learned from internal control activities into both strategic and operational decision-making and to continuously improve the quality and reliability of its ESG reporting.

1.3 Strategy

1.3.1 Strategy, business model and value chain (SBM-1)

Key elements of Acolad's general strategy that affect sustainability matters

Acolad is a leading global provider of content and language solutions, supporting corporates and public sectors in overcoming linguistic and cultural barriers through human and technology-enabled services. The Group operates in more than 20 countries across Europe, North America and Asia, delivering services to clients in sectors such as life sciences, public sector, legal, finance, and technology. Acolad's mission is to make information and communication accessible to all, helping organisations share knowledge, ensure compliance, and reach diverse audiences worldwide. Acolad's business model combines human linguistic expertise with innovative technology to deliver scalable, high-quality solutions. The Group's activities are structured around three main business areas:

- Language Services - including translation, interpreting, transcription, and linguistic validation
- Content and Digital Solutions – covering multilingual content creation, localization, e-learning, and digital experience management
- Technology and AI Solutions – encompassing machine translation, AI translation, AI-assisted workflows, and proprietary platforms that enhance productivity and data security.

Through its integration of linguistic expertise, data technology, and artificial intelligence, Acolad plays a role in shaping how information is produced, localised, and shared globally. This digital transformation enables clients to operate more efficiently, but it also brings new sustainability challenges related to data management, energy use, and ethical AI deployment.

Backed by nearly 30 years of experience, Acolad is positioned at the intersection of language expertise, digital content management, and artificial intelligence. The Group combines human linguistic excellence with innovative technological capabilities to deliver seamless multilingual communication and content transformation solutions. Acolad's core business encompasses translation, interpreting, transcription, multimedia, localisation, and learning services, supporting clients in expanding to global markets, accelerating time to market, and ensuring compliance with local and international standards.

This expertise is reinforced by Acolad's proprietary AI-powered platform, Lia, which integrates translation, multimedia, marketing, interpreting, and data services into a unified, secure digital ecosystem. Lia supports measurable quality, transparency, and efficiency, helping organisations accelerate time to market and manage multilingual content at scale.

Acolad's operations are underpinned by strong governance and data protection frameworks, including ISO 9001, ISO 17100, ISO 27001, SOC 2 Type II, and GDPR compliance, ensuring that innovation, quality, and ethical responsibility remain central to its long-term strategy.

The business model is based on the value chain detailed below:

Acolad's primary markets

Fully leveraging its technology-enabled content and language services, Acolad expands its target markets and enriches its business model:

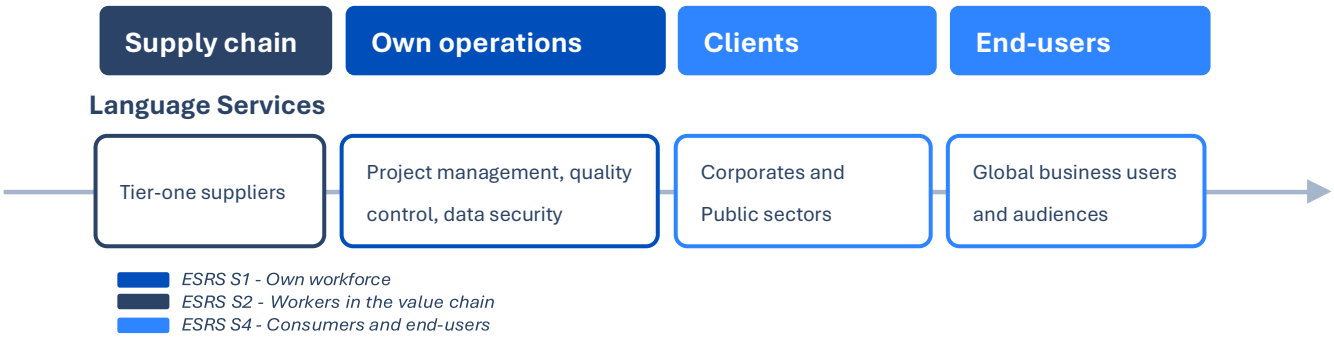
- Increasing penetration of its core professional content markets, especially in regulated sectors such as life sciences, legal, finance, public sector, luxury and technology
- Scaling its portfolio by offering end-to-end multilingual solutions across translation, interpreting, transcription, multimedia, localisation and learning services
- Extending service delivery models through digital platforms and AI-powered workflows (for example, Acolad Lia) to enable higher speed, greater transparency and more scalable client operations
- Entering new industry verticals and geographic regions, expanding direct delivery channels to reach global clients and multilingual audiences
- Optimising and diversifying revenue streams by adding value-added services such as data-driven language analytics and management, interpreting, multimedia and learning-services growth and content creation beyond traditional translation.
- For more information regarding: Headcount of employees by categories, see section 3.1.5
- The Group's major markets and customers: Life Sciences, Defence & Security, Manufacturing, High-Tech & Software, Luxury, Media & Entertainment, Ecommerce, Legal, Finance, Travel & Hospitality, Energy & Environment, Public Sector, Retail, Aerospace and Automotive in APAC, Europe and North America.

Business model and value chain

Acolad's business model is based on delivering comprehensive content and language solutions that enable organisations to communicate globally, efficiently, and compliantly. The Group combines human linguistic expertise with innovative technology and data-driven workflows to meet the needs of clients across sectors and geographies.

Acolad's core service offering spans translation, interpreting, transcription, multimedia localisation, learning services, and AI-driven content/data platforms. These services are delivered through a global network of language professionals, technology platforms (such as its AI-powered Lia suite), and operational hubs, enabling clients to scale their multilingual content operations and accelerate time to market.

The value chain integrates several key elements: sourcing linguistic talent and multilingual data, managing content workflows via secure and certified platforms, and delivering final content services to clients across regulated industries (life sciences, public sector, finance, technology). The Group's technology layer enhances productivity, traceability and compliance, while its global footprint (40+ offices in 22 countries) enables proximity and service delivery worldwide.



Acolad's tier-one suppliers are primarily freelance linguists and interpreters, technology and software partners, IT infrastructure providers, professional services and consultants, as well as office and facility service providers supporting the Group's global operations.

1.3.2 Interests and views of stakeholders (SBM-2)

In fulfilling its mission to make information and communication accessible to all, Acolad maintains continuous dialogue with its stakeholders to understand their expectations, strengthen trust, and identify potential risks and opportunities to proactively factor in the needs and expectations of interested parties, as part of its longstanding commitment to stakeholders. The resulting dialogue promotes connections and trust. It also mitigates potential risks and conflicts, including uncertainty, dissatisfaction, disengagement and resistance to change.

The following table presents the conditions for dialogue with each stakeholder.

Stakeholder	Key Acolad actors	Primary means of dialogue	Purpose	CSR/ESRS issue
Employees	• HR • Executive Management • Marketing	• Executive Committee • Work Councils • Employee opinion survey • Annual performance review • Townhalls • HR dialogue • Internal communications • Employees trainings • Internal events and initiatives	• Including employees' perceptions and experiences • Contributing to a sustainable workplace and work life • Promoting engagement, well-being, diversity and awareness of sustainability initiatives	• Social dialogue • Employee well-being, diversity and inclusion • Training and skills development • Business ethics and compliance • Social dialogue • Attracting, retaining and engaging talent • Personal data protection
Corporate Clients and Public Sectors	• Sales • Marketing • Account Management • Legal • Quality Assurance • CSR • Risk and Compliance	• Customer satisfaction surveys • Customer round tables • Account meetings • NPS tracking • RFP feedback	• Building trust • Strengthening partnerships • Providing more innovative solutions • Helping clients to meet their objectives • Ensuring quality and sustainability • Aligning with client ESG requirements	• Data privacy and protection • Ethical business conduct and compliance • IT security

Investors & Shareholders	• Executive Committee • Operational Management Board • CSR	• Board meetings with investors and shareholders • ESG performance reviews • Financial and ESG report • Website, specific emails	• Improving transparency • Aligning on corporate strategy and value creation • Understanding sustainability requirements • Attracting responsible investors	• Governance • Financial performance • ESG progress • Climate footprint management and climate change mitigation
Regulators	• Legal • HR • Risk & Compliance • CSR • Information Security	• Audits • Compliance reporting • Consultations	• Ensuring compliance with CSRD, GDPR, and labour standards • Monitoring regulatory compliance • Promoting sustainable development • Addressing the risks and opportunities associated with the climate transition	• Transparency • Data protection • IT Security • Business conduct • Corporate culture • Environmental compliance
Industry organisation and Society	• Marketing • HR • CSR	• Joint projects • Dedicated events • Website and social media • Sponsorships • Advocacy industry initiatives and events	• Exchanging best practices • Promote inclusion and access to language and education • Addressing specific groups' concerns	• Inclusion, ethical conduct • Community engagement • Education access • Socio-economic impact of solutions
Suppliers & Freelancers	• Finance • Procurement • Vendor Management • CSR • Risk & Compliance • Legal	• Sharing best practices and ambitions • Supplier certification and qualification questionnaire and review • Due diligence • Vendor meetings	• Compliance with the supplier charter • Promoting responsible sourcing • Protecting human and workers' rights • Ensuring a respectful work environment • Supply chain decarbonization	• Supplier payment terms • Decarbonization of the supply chain • Sustainable and responsible supply chain practices • Business ethics and compliance

1.4 Impact, Risk and Opportunity Management

1.4.1 Description of the processes to identify and assess material impacts, risks and opportunities (IRO-1)

The double materiality assessment aims to evaluate both Acolad's impacts on the environment and society, and the financial implication of sustainability matters on the Group's activities, performance, and development. This process enables Acolad to identify and prioritise its most significant impacts, risks, and opportunities (IROs) across its operations and value chain.

The double materiality assessment is part of the Group's general risk management, with the methodology as below.

Methodological approach

Acolad conducted its first double materiality assessment in 2023, engaging its principal internal and external stakeholders. The initial assessment was subsequently updated following the publication of the ESRS and finalized in 2024.

The assessment was led by the Group CSR team, with methodological support from an external sustainability consultancy (2023–2024) and through the adoption of a dedicated digital platform for climate and ESG data management in 2024. The CSR team coordinated the process, centralising stakeholder input and validating outcomes with relevant internal functions and governance bodies to ensure alignment with Acolad's overall risk management framework and ESRS requirements.

The double materiality assessment was carried out in three stages:

1. Preliminary analysis and identification of sustainability matters and impacts, risks and opportunities (IROs)

For this stage, Acolad relied on the list of ESG topics and sustainability matters established during its assessments conducted between 2023 and 2024, combining the outcomes of the external consultancy review (2023–2024) and the digital platform CSRD-compliant methodology (2024). This process identified the main sustainability matters relevant to Acolad's professional services business model and value chain.

A total of 17 internal and external stakeholders were involved, including representatives from management, HR, IT & Information Security, Tech, Finance, Legal, Risk and Compliance, Sales, Customer Excellence, Vendor Resource Management, Procurement, Quality and Operational Management Board members, as well as external stakeholders such as shareholders, clients, suppliers and linguistic vendors.

On the basis of these contributions, a list of impacts, risks, and opportunities (IROs) was identified using a combination of internal and external sources:

- Analysis of Acolad's activities and the regulatory environment in which the Group operates, both in France and internationally
- Results of previous materiality and risk assessments conducted with external consultants (2023–2024)
- The list of ESRS topics and subtopics
- Group risk mapping and existing internal controls
- Benchmarking with industry peers and competitors (e.g., RWS, TransPerfect)
- External standards and reference frameworks, including GRI, UNGC, SBTi, and OECD Due Diligence Guidelines.
- The identification of IROs also drew upon targeted analyses conducted within the Group:
  - Climate and energy risk analyses, assessing both physical and transition risks.
  - CSR and supplier risk assessments, including environmental and ethical compliance analyses.
  - Data protection and cybersecurity assessments, in accordance with GDPR and ISO 27701 standards.

These analyses enabled the Group to identify and confirm its specific matters and IROs.

By consolidating these sources, Acolad concluded a list of sustainability matters and associated IROs reflecting its most significant environmental, social, and governance challenges across its operations and value chain. These matters were then submitted for evaluation and scoring under the digital platform double materiality methodology.

2. Evaluation of IROs and sustainability matters

All potential material topics and their associated impacts, risks, and opportunities (IROs) were evaluated in accordance with the European ESG reporting Standards. The process involved a cross-functional process combining in-house representatives' workshops (CSR, Risk & Compliance, HR, IT/InfoSec, Procurement, Finance, Operations) and digital platform's CSRD-aligned assessment forms. The 2023–2024 external-consultancy work with the CSR Committee workshops was used to frame topics and gather internal feedback, then the 2024 digital platform workflow was used to compute materiality scores at ESRS sub-topic level and document IROs. Workshops confirmed and refined the list of IROs, and validated scope and definitions before scoring.

This evaluation stage built on the comments collected during the interviews and analyses conducted with internal and external stakeholders during the external consultancy phase and incorporated new assessments completed on digital platform in 2023-2024.

IROs and sustainability matters were examined through dedicated workshops and cross-functional reviews, resulting in:

- Confirmation of the list of IROs and their alignment with Acolad's business model and value chain;
- Validation and adjustment of their qualification (scope, type of impact, risk, or opportunity);
- Assessment of materiality on two levels: impact materiality and financial materiality.

Impact materiality was scored with digital platform's method at sub-topic level using four parameters: scale, scope and (ir)remediability (each 0–5) combined with likelihood (0–1). The sub-topic score is derived from the most material activity and then normalised; by default, own activities, suppliers and clients are weighted 50%/25%/25% in the final impact score (weights can be adjusted by business model). This approach is consistent with ESRS principles and is implemented directly in the platform.

Financial materiality was assessed through platform's two pillars: (i) expected stakeholder reactions (customers, suppliers, investors, regulators, NGOs, society), and (ii) resource-dependency analysis (exposure to changes in availability, regulation, price or quality of key resources). Each pillar uses platform's scoring scales (1–4); the final financial score for a sub-topic equals the highest score across relevant stakeholder reactions or dependencies, in line with the platform's methodology.

Each ESRS sub-topic received computed impact and financial scores in the platform; Acolad adopted materiality thresholds of 60% for both impact and financial materiality to prioritise topics for CSRD reporting (thresholds selectable in the tool). Topics above the thresholds are treated as material and feed the IRO register and data-collection perimeter.

In line with Acolad's operational profile: a provider of languages and content solutions, the topics E2 (Pollution), E3 (Water), E4 (Biodiversity), E5 (Resource use and circular economy), and S3 (Affected Communities) were determined as non-material under the double-materiality assessment, consistent with the CSRD's definitions.

3. Consolidation and approval of results

Following the workshops conducted with internal representatives and cross-functional departments, the CSR team ensured the consistency of the platform's evaluations with Acolad's overall enterprise risk mapping and the prior external-consultancy findings. The results of the impact and financial materiality analyses were consolidated, validated, and grouped under the relevant ESRS sustainability matters.

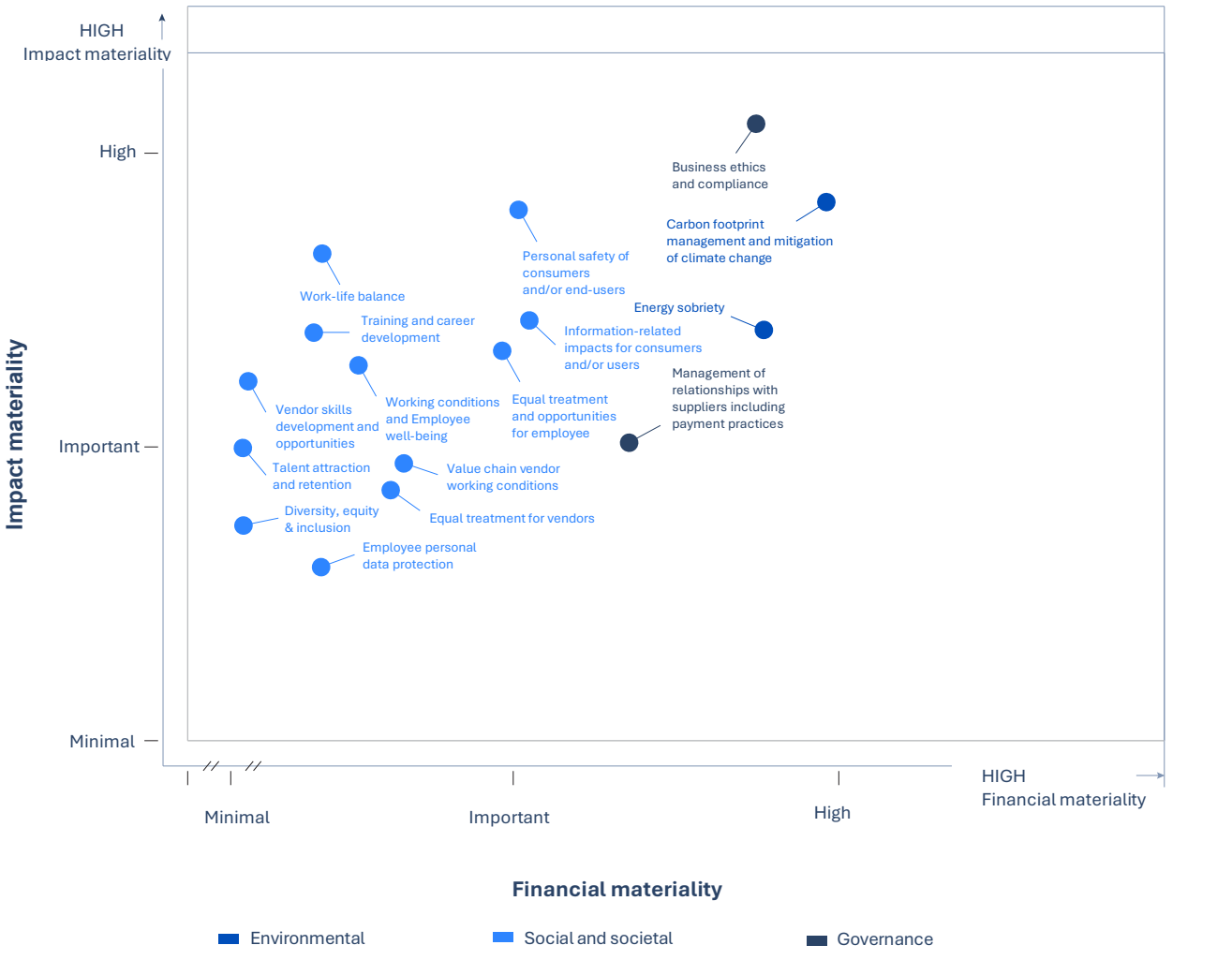
The first double materiality assessment was reviewed in 2023-2024, following the external-consultancy phase, and presented to the CSR Committee for validation. In 2024, the analysis was updated and refined to align with the finalised ESRS delegated acts, integrating additional stakeholder feedback, updated risk mapping, and the platform scoring system. The consolidated results were reviewed again by the CSR Committee and shared with the Executive Committee and Risk & Compliance team to ensure consistency with the Group's enterprise-risk management framework and sustainability governance.

In 2024, the CSR team finalised the integration of the double materiality results within the digital platform, establishing a traceable link between sustainability matters, impacts, risks, opportunities, and related KPIs. This step allowed harmonisation of reporting processes across Acolad's entities and facilitated alignment with CSRD data-collection and audit requirements.

The material IROs resulting from the assessment have been grouped into sustainability matters for the Group.

Results

The consolidated double materiality assessment identified 16 material sustainability matters across the environmental, social, and governance pillars. These topics, assessed with the external-consultancy and reviewed through platform's CSRD methodology, now form the foundation for Acolad's CSRD disclosures, risk management, and long-term sustainability strategy.



The Group's key sustainability priorities

In connection with its sustainability strategy and in line with the priorities identified by the double materiality assessment, Acolad has set quantitative targets for each of its medium- and long-term commitments based on eight key metrics relating to the organization as a whole.

For Social:

- Acolad confirms its objective of promoting gender balance among executive positions. “Diversity, inclusion and equity” in the double materiality matrix.
- Acolad is stepping up its ambition of improving the employability of its teams through training. “Training and skills development” in the double materiality matrix.
- Acolad confirms its goal of encouraging employee commitment through fair working conditions. “Employee well-being at work” in the double materiality matrix.

For Environment:

- Acolad is accelerating its greenhouse gas emissions reduction plan, with a dedicated metric for scopes 1 and 2 alongside its SBTi commitment. “Climate footprint management and climate change mitigation” in the double materiality matrix.
- Acolad promotes more sustainable mobility and energy efficient AI/data practices. “Energy sobriety” in the double materiality matrix.

For Governance:

- Acolad has committed to IT and Cybersecurity through the certification of its payment authorization platforms. “IT security” in the double materiality matrix.
- Acolad is strengthening its commitment to ethics for its employees and vendors. “Business ethics and compliance” in the double materiality matrix.
- Acolad is enhancing the management of its supplier relationships, including fair and timely payment practices. “Supplier relationship management, including payment practices” in the double materiality matrix.

1.4.2 Material impacts, risks and opportunities and their link with strategy and business model (SBM-3)

The double materiality assessment highlighted the material impacts, risks and opportunities (IROs) associated with the 16 sustainability matters listed below.

A = Actual; P = Potential; + for positive, - for negative

CSR & ESRS priorities (I – Impacts; R – Risks; O – Opportunities)	Impact category (A/P; +/-)	Time horizon
(ESRS E1) Climate footprint management and climate change mitigation I: Acolad contributes to GHG emissions through office energy, business travel, IT infrastructure and vendor activities. At the same time, aligning with Paris Agreement goals in our own operations and in the upstream value chain reinforces our climate responsibility and supports global decarbonisation efforts. R: Failure to implement a credible and science-aligned decarbonisation pathway may result in restricted access to capital, reduced competitiveness in tenders and loss of market share as clients and investors increasingly require low-carbon partners. O: A Paris-aligned climate strategy and effective emissions reduction efforts strengthen leadership in regulatory compliance, attract sustainability-focused investment and increase market share as customers prioritise partners committed to climate goals.	A&P; - impact materiality	Medium/ long-term
(ESRS E1) Energy sobriety I: Acolad’s digital operations and growing use of AI increase energy demand and contribute to pressure on power systems and climate impacts. Ongoing actions to improve energy efficiency in offices, optimise IT systems and collaborate with cloud providers support lower energy use in our operations and upstream value chain. R: Rising energy prices or limited electricity availability may increase operating costs and disrupt service delivery, affecting client commitments. A reliance on non-renewable energy sources may also lead to a loss of market competitiveness as clients increasingly favour low-carbon partners.	A&P; - impact materiality	Short/ Medium-term

O: Reducing energy consumption and improving efficiency across the operation, strengthens service resilience and aligns with client expectations on responsible digital practices. Increased market share may result from energy efficiency performance and reduced energy consumption.		
(ESRS S1) Talent attraction and retention I: Structured upskilling programs enhance innovation, boosts talent retention, and increases the availability and quality of internal expertise, contributing positively to overall organisational performance. R: Talent shortages and insufficient reskilling may reduce service quality and response capacity, creating operational inefficiencies that can lower overall performance and ultimately lead to loss of revenue.	P; + impact materiality	Short/Medium-term
(ESRS S1) Training and career development I: Providing fair access to training and maintaining transparent records on recruitment strengthens skills development, supports career progression, and reinforces trust and fairness in people management, contributing to a more agile and engaged workforce. R: Limited career development, restricted access to training and slow reskilling may undermine employee experience and weaken Acolad's reputation as an attractive employer, making it harder to retain and attract talent over time. O: Ongoing workforce development fosters creativity and strengthens the company's ability to innovate, leading to improved service offerings and better adaptation to evolving client needs and market expectations.	P; + impact materiality	Short/Medium-term
(ESRS S1) Working conditions and employee well-being I: Employee well-being drives productivity and service quality. Clear policies on work environment, anti-harassment and fair employment reinforce a healthy and secure workplace. R: Workload pressure during transformation may increase psychosocial risks, absenteeism and turnover and negatively affect perceived workplace quality. Labour code non-compliance may trigger sanctions and legal action, while reputational damage can undermine talent attraction and retention. O: Strengthening well-being programs improves work experience, reduces turnover costs and enhances sustainable performance and engagement.	A&P; + impact materiality	Short/Medium-term
(ESRS S1) Work-life balance I: Global coordination and delivery cycles can create workload peaks, and without clear policies on working hours or open dialogue, employee well-being and work-life balance are undermined. R: Persistent workload pressure and inadequate workforce can lead to reduce motivation and productivity, increase turnover, and weaken the company's ability to attract and retain qualified talent.	A&P; - impact materiality	Short-term

O: Improving workload planning, flexibility, and monitoring enhances employee experience and productivity, leading to increased performance and higher business output.		
(ESRS S1) Diversity, equity and inclusion I: Acolad's global footprint enables the promotion of strong working conditions and DEI values across regions. This diversity strengthens innovation and collaboration, supported by formal policies on fairness, anti-harassment and equal opportunity. R: Insufficient integration of DEI may damage Acolad's reputation and weaken client trust, particularly among large corporate and public-sector clients with strict supply-chain requirements, potentially leading to reduced engagement or loss of business.	A&P; + impact materiality	Short/Medium-term
(ESRS S1) Equal treatment for employee I: Acolad's cultural diversity strengthens its ability to operate globally, creating opportunities for people from a wide range of backgrounds and enriching the organisation with varied perspectives and talent. R: Unfair or unequal treatment, including inappropriate management practices or perceived pay gaps, may lead to employee dissatisfaction, reduced engagement and increased turnover, ultimately affecting service quality and financial performance.	A&P; + impact materiality	Medium/long-term
(ESRS S1) Employee personal data protection I: Inadequate protection of employees' personal data may lead to breaches of privacy and undermine their trust in the organisation. R: Breaches of employees' personal data may result in violations of their privacy, potential compensation claims, and reputational damage for the organisation.	A&P; - impact materiality	Short-term
(ESRS S2) Value chain vendor working conditions I: Irregular workloads, tight deadlines and limited support for freelance linguists and suppliers can affect well-being, reduce job satisfaction and create pressure on work-life balance. These conditions may weaken service quality over time and challenge responsible practices across Acolad's global value chain. R: Vendor overload, inconsistent conditions or inefficient workflows may reduce quality, delivery reliability and long-term vendor engagement. O: Supporting vendor well-being and fair workload practices strengthens resilience, quality and vendor loyalty across the network.	A&P; - impact materiality	Short/Medium-term
(ESRS S2) Equal treatment for vendors I: Monitoring vendor conditions such as wages, social protection and payments helps promote fairer standards in lower-regulated regions. Strengthened platforms and streamlined processes enhance vendor satisfaction and engagement, supporting Acolad's credibility across its global network. R: Unequal treatment or inconsistent standards may erode trust, reduce supply reliability and harm reputation in client audits.	P; + impact materiality	Medium/long-term

(ESRS S2) Vendor skills development and opportunities I: Supporting the upskilling of linguistic vendors strengthens their professional development and employment stability, helps maintain fair earning conditions, and enhances service quality. R: Insufficient vendor capabilities, whether due to skills gaps, limited AI/tool adoption or scarce language combinations, may reduce Acolad's ability to meet client requirements. This can undermine service delivery, damage client satisfaction and ultimately affect commercial performance.	P; + impact materiality	Short/Medium-term
(ESRS S4) Personal safety of consumers and/or end-users I: Mismanagement of confidential or sensitive client content, including medical, legal or humanitarian information, undermines trust, weakens stakeholder confidence and may negatively affect end users who rely on accurate and secure communication. R: Cyber incidents or GDPR non-compliance could lead to regulatory penalties, reputational damage and client loss, with significant risks for vulnerable user groups.	A&P; - impact materiality	Short/Medium-term
(ESRS S4) Information security related impacts for clients I: Strong protection of personal data safeguards individual rights and privacy, particularly for vulnerable groups who rely on language services in sensitive contexts such as healthcare, legal procedures or refugee support. Secure processing helps ensure that essential information is handled with dignity and confidentiality. R: Data misuse or security breaches may cause operational disruption, legal exposure and reputational harm, reducing client confidence and contract renewal rates.	A&P; + impact materiality	Medium/long-term
(ESRS G1) Business ethics and compliance I: Strong ethical conduct across regions supports organisational integrity and reinforces trust with clients and employees. A documented Code of Ethics and sustainability commitments guide responsible behaviour and promote fairness and respect in daily operations. R: Inconsistent ethical practices or compliance gaps could result in legal exposure, internal misconduct and loss of client and employee trust. O: Strengthening ethics training, governance processes and sustainability practices enhances credibility, supports responsible growth and contributes to increased market share with clients prioritising ethical partners.	A&P; + impact materiality	Medium/long-term
(ESRS G1) Suppliers and Vendors payment practices I: Unfair and non-transparent payment terms affect supplier stability, quality delivery and trust across the vendor ecosystem. R: Payment delays or fragmented processes could weaken supplier relationships, reduce availability of qualified vendors and create operational disruption. O: Improving payment systems and maintaining fair, transparent terms strengthens supplier loyalty, supports performance, and generates cost efficiencies through more stable and reliable vendor partnerships.	A&P; - impact materiality	Short-term

The detailed impacts, risks and opportunities, as well as their positions in Acolad's value chain, are presented in each topical ESRS.

Resilience of the strategy and business model to material impacts, risks and opportunities

- **Impacts:** Acolad has strengthened its business model to reduce its negative environmental and social impacts across its own operations and value chain. The corresponding processes and action plans are monitored. Actions to mitigate the negative impacts of the Group's activities on the environment demonstrate Acolad's responsibility, which helps to maintain its reputation and customer confidence. Acolad works to ensure the well-being and satisfaction of its workers. By promoting the development, diversity and inclusion of its employees, the Group is able to retain talent and strengthen the stability and resilience of its workforce.
- **Risks:** Acolad's strategy and business model take into account the sustainability risks linked to its activities. Acolad integrates sustainability-related risks into its enterprise risk and CSR governance systems, monitoring climate exposure, digital security, and social challenges. Regular oversight by the CSR Committee, Risk Committee, and cross-business controls ensures mitigation actions remain effective, compliant, and aligned with evolving regulatory and client expectations.
- **Opportunities:** Acolad's strategy and business model were designed to seize business opportunities arising from changing market needs and the transition to more sustainable activities. Investments in AI and scalable digital platforms strengthen competitiveness and operational agility. Responsible vendor partnerships, ethical business practices, and strong privacy and cybersecurity controls reinforce client trust and enable long-term resilience. The Group is adapting to a changing landscape and continuing to improve in sustainable value creation.

Social impacts and risks relating to employees as well as non–employee workers are particularly closely monitored, given the nature of Acolad's service business, as detailed in section 3.1, and the environmental risks, as detailed in sections 2.1.

1.4.3 Disclosure requirements in ESRS covered by the undertaking's sustainability statement (IRO-2)

List of datapoints in cross-cutting and topical standards that derive from other EU legislation:

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Section of the ESG report containing the information
ESRS 2 GOV-1 Board's gender diversity paragraph 21 (d)	Indicator number 13 of Table #1 of Annex 1		Commission Delegated Regulation (EU) 2020/181612, Annex II		1.2.1
ESRS 2 GOV-1 Percentage of board members who are independent paragraph 21 (e)			Delegated Regulation (EU) 2020/1816, Annex II		1.2.1
ESRS 2 GOV-4 Statement on due diligence paragraph 30	Indicator number 10 Table #3 of Annex 1				1.2.4
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities paragraph 40 (d) i	Indicators number 4 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/245313 Table 1: Qualitative information on	Delegated Regulation (EU) 2020/1816, Annex II		Not material

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Section of the ESG report containing the information
		Environmental risk and Table 2: Qualitative information on social risk			
ESRS 2 SBM-1 Involvement in activities related to chemical production paragraph 40 (d) ii	Indicator number 9 Table #2 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II		Not material
ESRS 2 SBM-1 Involvement in activities related to controversial weapons paragraph 40 (d) iii	Indicator number 14 Table #1 of Annex 1		Delegated Regulation (EU) 2020/181814, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		Not material
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco paragraph 40 (d) iv			Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		Not material
ESRS E1-1 Transition plan to reach climate neutrality by 2050 paragraph 14				Regulation (EU) 2021/1119, Article 2(1)	2.1.2.1
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g)		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book Climate Change transition risk: Credit quality of exposures by sector,	Delegated Regulation (EU) 2020/1818, Article12.1 (d) to (g), and Article 12.2		Not applicable

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Section of the ESG report containing the information
		emissions and residual maturity			
ESRS E1-4 GHG emission reduction targets paragraph 34	Indicator number 4 Table #2 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 6		2.1.3.4
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) paragraph 38	Indicator number 5 Table #1 and Indicator n. 5 Table #2 of Annex 1				2.1.3.5
ESRS E1-5 Energy consumption and mix paragraph 3	Indicator number 5 Table #1 of Annex 1				2.1.3.5
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43	Indicator number 6 Table #1 of Annex 1				Not applicable
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions paragraph 44	Indicators number 1 and 2 Table #1 of Annex 1	Article 449a; Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book – Climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 5(1), 6 and 8(1)		2.1.3.6

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Section of the ESG report containing the information
ESRS E1-6 Gross GHG emissions intensity paragraphs 53 to 55	Indicators number 3 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 8(1)		2.1.3.6
ESRS E1-7 GHG removals and carbon credits paragraph 56				Regulation (EU) 2021/1119, Article 2(1)	2.1.3.7
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks paragraph 66			Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II		Not applicable
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a) ESRS E1-9 Location of significant assets at material physical risk paragraph 66 (c).		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraphs 46 and 47; Template 5: Banking book - Climate change physical risk: Exposures subject to physical risk.			Not applicable
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy efficiency classes paragraph 67 (c).		Article 449a Regulation (EU) No 575/2013; Commission			Not applicable

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Section of the ESG report containing the information
		Implementing Regulation (EU) 2022/2453 paragraph 34;Template 2:Banking book - Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral			
ESRS E1-9 Degree of exposure of the portfolio to climate related opportunities paragraph 69			Delegated Regulation (EU) 2020/1818, Annex II		Not applicable
ESRS E2-4 Amount of each pollutant listed in Annex II of the EPRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	Indicator number 8 Table #1 of Annex 1 Indicator number 2 Table #2 of Annex 1 Indicator number 1 Table #2 of Annex 1 Indicator number 3 Table #2 of Annex 1				Not material
ESRS E3-1 Water and marine resources paragraph 9	Indicator number 7 Table #2 of Annex 1				Not material
ESRS E3-1 Dedicated policy paragraph 13	Indicator number 8 Table 2 of Annex 1				Not material
ESRS E3-1 Sustainable oceans and seas paragraph 14	Indicator number 12 Table #2 of Annex 1				Not material
ESRS E3-4 Total water recycled and reused paragraph 28 (c)	Indicator number 6.2 Table #2 of Annex 1				Not material
ESRS E3-4 Total water consumption in m3 per net revenue on own operations paragraph 29	Indicator number 6.1 Table #2 of Annex 1				Not material

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Section of the ESG report containing the information
ESRS 2- IRO 1 - E4 paragraph 16 (a) i	Indicator number 7 Table #1 of Annex 1				Not material
ESRS 2- IRO 1 - E4 paragraph 16 (b)	Indicator number 10 Table #2 of Annex 1				Not material
ESRS 2- IRO 1 - E4 paragraph 16 (c) Indicator number 14 Table #2 of Annex 1	Indicator number 14 Table #2 of Annex 1				Not material
ESRS E4-2 Sustainable land / agriculture practices or policies paragraph 24 (b) Indicator number 11 Table #2 of Annex 1	Indicator number 11 Table #2 of Annex 1				Not material
ESRS E4-2 Sustainable oceans / seas practices or policies paragraph 24 (c)	Indicator number 12 Table #2 of Annex 1				Not material
ESRS E4-2 Policies to address deforestation paragraph 24 (d)	Indicator number 15 Table #2 of Annex 1				Not material
ESRS E5-5 Non-recycled waste paragraph 37 (d)	Indicator number 13 Table #2 of Annex 1				Not material
ESRS E5-5 Hazardous waste and radioactive waste paragraph 39	Indicator number 9 Table #1 of Annex 1				Not material
ESRS 2- SBM3 - S1 Risk of incidents of forced labour paragraph 14 (f)	Indicator number 13 Table #3 of Annex I				3.1.1.2
ESRS 2- SBM3 - S1 Risk of incidents of child labour paragraph 14 (g)	Indicator number 12 Table #3 of Annex I				3.1.1.2
ESRS S1-1 Human rights policy commitments paragraph 20	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex I				3.1.6.1
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor			Delegated Regulation (EU) 2020/1816, Annex II		3.1.6.1

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Section of the ESG report containing the information
Organisation Conventions 1 to 8, paragraph 21					
ESRS S1-1 processes and measures for preventing trafficking in human beings paragraph 22	Indicator number 11 Table #3 of Annex I				3.1.6.2
ESRS S1-1 workplace accident prevention policy or management system paragraph 23	Indicator number 1 Table #3 of Annex I				Not material
ESRS S1-3 grievance/complaints handling mechanisms paragraph 32 (c)	Indicator number 5 Table #3 of Annex I				3.1.3
ESRS S1-14 Number of fatalities and number and rate of work-related accidents paragraph 88 (b) and (c)	Indicator number 2 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II		3.1.8.2
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e)	Indicator number 3 Table #3 of Annex I				3.1.8.2
ESRS S1-16 Unadjusted gender pay gap paragraph 97 (a)	Indicator number 12 Table #1 of Annex I				3.1.11.3
ESRS S1-16 Excessive CEO pay ratio paragraph 97 (b)	Indicator number 8 Table #3 of Annex I				Not available
ESRS S1-17 Incidents of discrimination paragraph 103 (a)	Indicator number 7 Table #3 of Annex I				3.1.6.3
ESRS S1-17 non-respect of UNGPs on Business and Human Rights and OECD paragraph 104 (a)	Indicator number 10 Table #1 and Indicator n. 14 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12 (1)		3.1.6.3
ESRS 2- SBM3 – S2 Significant	Indicators number				3.2.1

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Section of the ESG report containing the information
risk of child labour or forced labour in the value chain paragraph 11 (b)	12 and n. 13 Table #3 of Annex I				
ESRS S2-1 Human rights policy commitments paragraph 17	Indicator number 9 Table #3 and Indicator n. 11 Table #1 of Annex 1				3.2.2.1
ESRS S2-1 Policies related to value chain workers paragraph 18	Indicator number 11 and n. 4 Table #3 of Annex 1				3.2.2.1
ESRS S2- 1 Non respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		3.2.2.1
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19			Delegated Regulation (EU) 2020/1816, Annex II		3.2.2.1
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36	Indicator number 14 Table #3 of Annex 1				3.2.2.4
ESRS S3-1 Human rights policy commitments paragraph 16	Indicator number 9 Table #3 of Annex 1 and Indicator number 11 Table #1 of Annex 1				Not material
ESRS S3-1 non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines paragraph 17	Indicator number 10 Table #1 Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		Not material

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Section of the ESG report containing the information
ESRS S3-4 Human rights issues and incidents paragraph 36	Indicator number 14 Table #3 of Annex 1				Not material
ESRS S4-1 Policies related to consumers and end-users paragraph 16	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex 1				3.3.3.1
ESRS S4-1 non-respect of UNGPs on Business and Human Rights and OECD guidelines paragraph 17	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		Not applicable
ESRS S4-4 Human rights issues and incidents paragraph 35	Indicator number 14 Table #3 of Annex 1				3.1.6.3
ESRS G1-1 United Nations Convention against Corruption paragraph 10 (b)	Indicator number 15 Table #3 of Annex 1				4.1.4
ESRS G1-1 Protection of whistle- blowers paragraph 10 (d)	Indicator number 6 Table #3 of Annex 1				4.1.2
ESRS G1-4 fines for violation of anti-corruption and anti-bribery laws paragraph 24 (a)	Indicator number 17 Table #3 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II)		4.1.5
ESRS G1-4 Standards of anticorruption and anti- bribery paragraph 24 (b)	Indicator number 16 Table #3 of Annex 1				4.1.4

Simplified cross-reference table of the ESRS disclosure requirements with the chapters in the ESG report [ESRS 2 IRO-2]

12 Standards & Topics (ESRS)	Materiality	Sections of the ESG report
ESRS 1 and ESRS 2 - Requirements and General Information		
BP-1: Preparation		1.1 Basis for preparation
SBM-1: Strategy, business model		1.3.1 Strategy, business model and value chain (SBM-1)
SBM-2: Interests and views of stakeholders		1.3.2 Interests and views of stakeholders (SBM-2)
SBM-3: Impacts, risks and opportunities in line with the company's strategy IRO-1: IRO identification process		1.4 Impact, Risk and Opportunity management 1.4.1 Description of the processes to identify and assess material impacts, risks and opportunities (IRO-1)
IRO-2: ESRS covered in the ESG report		1.4.3 Disclosure requirements in ESRS covered by the undertaking's sustainability statement (IRO-2)
GOV-1: The role of the administrative, management and supervisory bodies GOV-2: Information sent to the Company's administrative, management and supervisory bodies and the sustainability issues handled by these bodies GOV-3: Integration of sustainability-related performance in incentive schemes GOV-4: Statement on due diligence GOV-5: Risk management and internal controls over ESG reporting		1.2.1 The role of the administrative, management and supervisory bodies (GOV-1) 1.2.2 Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies (GOV-2) 1.2.3 Integration of sustainability-related performance in incentive schemes (GOV-3) 1.2.4 Statement on due diligence (GOV-4) 1.2.5 Risk management and internal controls over ESG reporting (GOV-5)
ESRS E1 - Climate		
E1-1: Transition plan	Material	2.1.1.1.1 Transition plan for climate change mitigation (E1-1)
E1-2: Policies related to climate change mitigation and adaptation		2.1.3.2 Policies related to climate change mitigation (E1-2)
E1-3: Actions and resources related to the policies		2.1.3.3 Actions and resources in relation to climate change policies (E1-3)
E1-4: Targets		2.1.3.4 Targets related to climate change mitigation (E1-4)
E1-5: Energy consumption and energy mix		2.1.3.5 Energy consumption and mix (E1-5)
E1-6: GHG emissions (Scopes. 1 + 2 + 3)		2.1.3.6 Gross scopes 1, 2, 3 and total GHG emissions (E1-6)
E1-7: GHG removals and carbon credits E1-8: Internal carbon pricing scheme E1-9: Anticipated financial effects	Non- material	
ESRS E2 - Pollution	Non- material	
ESRS E3 - Water & Marine Resources	Non- material	Water consumption
ESRS E4 - Biodiversity and Ecosystems	Non- material	Analysis of impacts on biodiversity
ESRS E5 - Resource Use & Circular Economy E5-1: Policies related to resource use and circular economy E5-2: Actions E5-3: Targets	Non- material	

12 Standards & Topics (ESRS)	Materiality	Sections of the ESG report
ESRS S1 - Own workforce		
S1-1: Own workforce policy	Material	3.1 Own workforce (ESRS S1)
S1-2: Dialogue with employees and their representatives		3.1.2 Processes for engaging with own workers and workers' representatives about impacts (S1-2)
S1-3: Impact repair and channels for raising concerns		3.1.3 Processes to remediate negative impacts and channels for own workers to raise concerns (S1-3)
S1-4: Material impacts, risks and opportunities		S1-4
S1-5: Targets		S1-5

S1-6: Employee characteristics		3.1.5 Description of characteristics of Acolad's employees and non-employees (S1-6 and S1-7)
S1-7: Non-employee characteristics		3.1.5 Description of characteristics of Acolad's employees and non-employees (S1-6 and S1-7)
S1-8: Coverage of collective bargaining and social dialogue		3.1.7 Social dialogue (S1-8)
S1-9: Diversity		3.1.11 Diversity, equity & inclusion Age diversity (S1-9) Gender diversity (S1-9)
S1-10: Adequate wages		3.1.11 Diversity, equity & inclusion Gender pay gap and total remuneration ratio (S1-10, S1–16)
S1-11: Social protection		3.1.8 Working Conditions Fair working conditions (S1-11)
S1-12: Persons with disabilities		3.1.11 Diversity, equity & inclusion Persons with disabilities (S1-12)
S1-13: Training		3.1.9 Equal treatment and opportunities for all Training and skills development (S1-13) Career Development and Performance (S1-13)
S1-14: Health & Safety		3.1.8 Working Conditions Health, safety and work environment initiatives (S1-14)
S1-15: Work-life balance		3.1.8 Working Conditions Work-life balance (S1-15)
S1-16: Compensation		3.1.11 Diversity, equity & inclusion Gender pay gap and total remuneration ratio (S1–16)
S1-17: Human rights cases and complaints	Non- material	
ESRS S2 - Workers in the value chain	Material	
S2-1: Policies related to workers in the value chain		3.2.2.1 Policies (S2-1)
S2-2: Dialogue process with workers in the value chain		3.2.2.2 Processes for engaging with value chain workers about impacts (S2-2)
S2-3: Adverse impacts remediation process		3.2.2.3 Processes to remediate negative impacts and channels for value chain workers to raise concerns (S2-3)
S2-4: Actions concerning material impacts		3.2.2.4 Actions (S2-4)
S2-5: Targets for the management of material adverse impacts, management of material risks and opportunities		3.2.2.5 Metrics and targets (S2-5)
ESRS S3 - Affected communities	Non- material	
S3-1, S3-2, S3-3, S3-4, S3-5		
ESRS S4 - Consumers and end-users	Material	
S4-1: Policies related to consumers & end-users		3.3.3.1 Policies (S4-1)
S4-2: Dialogue process		3.3.2.1 Processes for engaging with consumers and end-users about impacts (S4-2)
S4-3: Adverse impacts remediation process and channels to raise concerns		3.3.2.2 Processes to remediate negative impacts and channels for consumers and end-users to raise concerns (S4-3)
S4-4: Actions to manage material risks and opportunities		3.3.3.2 Actions (S4-4)
S4-5: Targets		3.3.3.3 Metrics and targets (S4-5)
ESRS G1 - Business conduct		
G1-1: Policies related to business conduct	Material	4.1.2 Corporate culture and business conduct policies (G1-1)
G1-2: Management of relationships with suppliers		4.1.3 Management of relationships with suppliers (G1-2)
G1-3: Prevention and detection of corruption and bribery		4.1.4 Prevention and detection of corruption and bribery (G1-3)
G1-4: Incidents of corruption or bribery		4.1.5 Incidents of corruption or bribery (G1-4)
G1-6: Payment practices		4.1.7 Payment practices (G1-6)
G1-5: Political influence and lobbying	Non- material	

2 Environmental data

2.1 Climate change (ESRS E1)

Climate change is a critical global issue with far-reaching impacts on ecosystems, societies and economies. Rising temperatures, changing weather patterns and the growing frequency of extreme events such as heatwaves, wildfires, droughts and severe storms demonstrate the urgency of collective and sustained action. These developments emphasise the need for organizations, including Acolad, to understand and manage their environmental footprint, anticipate climate-related risks and opportunities and support the transition to a low-carbon and climate-resilient economy in line with scientific recommendations and evolving regulatory requirements.

In 2025, the effects of climate change became increasingly evident across regions, reinforcing the urgency for decisive action. Scientific analyses indicate that global greenhouse gas emissions remain on an upward trajectory, putting international objectives to limit temperature rise to 1.5°C at significant risk. At the same time, communities are already facing severe weather patterns far sooner and more intensively than anticipated only a few years ago. This context underlines the need for accelerated, coordinated efforts from organisations and stakeholders to reduce emissions, build resilience, and contribute to global climate goals.

Acolad recognizes the urgency to reduce its environmental impact and contribute to climate action in line with regulatory expectations and its sustainability objectives. The Group has introduced measures focused on greenhouse-gas monitoring, energy use, business-travel reduction and responsible procurement. Beyond internal action, Acolad works collaboratively with clients, business partners, suppliers and employees to promote responsible practices and environmental awareness across its value chain, contributing to wider climate efforts and supporting the Sustainable Development Goals.

Acolad has progressively structured its sustainability commitments aligning with international principles and strengthening its environmental governance and reporting practices. The Group's voluntary environmental commitments underpinning the Groupe's policy, and reaffirmed annually, correspond to the following factors:

- 2010: Joined the United Nations Global Compact, committing to align activities with the Ten Principles on human rights, labour, environment, and anti-corruption;
- 2022: Conducted the first greenhouse gas assessment covering the Group's main headquarters and initiated the deployment of a structured CSR and ESG roadmap;
- 2023: Updated the Group CSR Policy and completed the first consolidated carbon footprint at Group level, expanding emissions reporting across all scopes and geographies; the Board has also featured a CSR Committee whose duties include a specific review of climate-related issues.
- 2024: Submitted the commitment to the Science Based Targets initiative (SBTi) and completed the first group CDP Climate Change disclosure, reinforcing transparency.

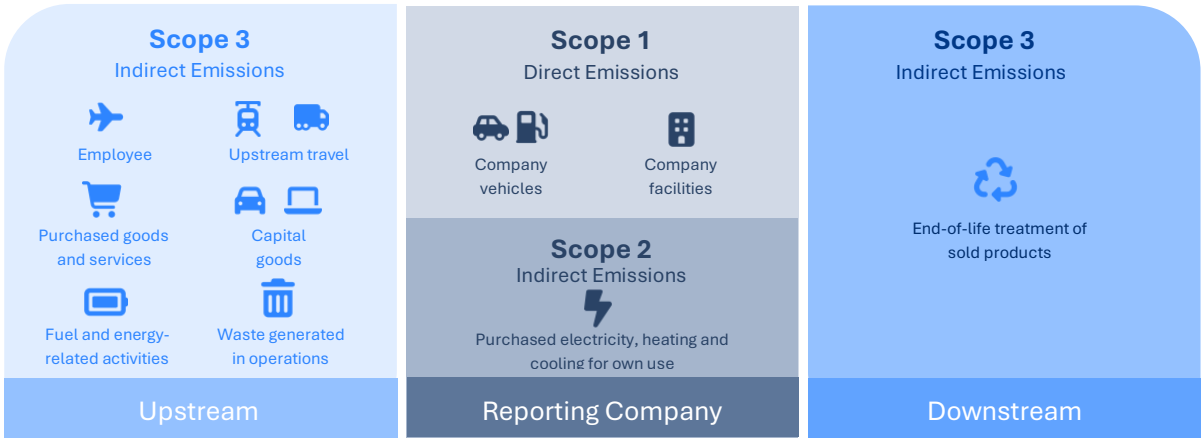
The nature of Acolad's operations as a professional services and technology-enabled language solutions provider means that the Group has limited direct environmental impacts and relatively low energy consumption. The organisation's greenhouse gas emissions are primarily linked to office energy use, employee commuting, business travel, and IT-related activities rather than industrial processes or manufacturing. As of the end of 2025, Acolad was not covered by any mandatory carbon pricing schemes or emissions trading systems. Nevertheless, Acolad has been committed to combating climate change since 2022 and has a proactive policy for reducing its carbon emissions.

Acolad's overall carbon footprint is divided into three emissions categories according to the GHG Protocol:

- Scope 1: direct GHG emissions associated with gas and fuel consumption at all Group sites and fuel consumption by company cars. This also includes GHG emissions associated with any refrigerant gas leaks;
- Scope 2: indirect GHG emissions associated with electricity, heat and cooling purchased by sites operated by the Group and for company cars;
- Scope 3: other indirect GHG emissions associated with its upstream and downstream value chain.

Acolad's 2025 assessment estimated its greenhouse gas emissions at 4,109 metric tons of CO2eq, with the following breakdown:

- Scope 1: 102 metric tons of CO2eq.; E1-6;
- Scope 2: 163 metric tons of CO2eq.; E1-6;
- Scope 3: 3,844 metric tons of CO2eq. E1-6.



2.1.1 Integration of sustainability-related performance in incentive schemes (ESRS 2 GOV-3)

As detailed in section 1.2.3 ESRS 2 GOV-3, Acolad's compensation policy for corporate officers is part of the Group's overall growth strategy. The current strategic plan aims to leverage Acolad's business model and operational strengths to achieve profitable and sustainable growth over the coming years. At this stage, the Group has not yet introduced incentive schemes or remuneration components directly linked to sustainability matters for its administrative, management, or supervisory bodies. However, the Supervisory Board and shareholders have identified several key performance indicators in the environmental, social, and governance (ESG) areas that are monitored as part of Acolad's broader corporate performance objectives. Some of these ESG indicators are also linked to the Group's corporate financing structure and loan agreements, reflecting the growing importance of sustainability in Acolad's overall performance management.

Acolad recognizes the relevance of integrating sustainability performance into remuneration mechanisms to strengthen accountability and align management objectives with long-term value creation. The Group therefore intends to progressively incorporate sustainability-related performance criteria into its variable compensation framework within the next two years. This development will form part of the Group's broader Corporate Social Responsibility and will contribute to embedding sustainability more deeply into Acolad's governance and performance culture.

2.1.2 Strategy

2.1.2.1 Transition plan for climate change mitigation (E1-1)

As a participant of the UN Global Compact since 2010, Acolad is committed to integrating climate considerations into its strategy and providing transparent, consistent, and reliable information to stakeholders, including investors, enabling them to assess climate-related financial risks. The Group aims to identify, manage and anticipate climate-related risks and impacts, support its transition toward a low-carbon model, and strengthen long-term resilience. Acolad has committed to the Science Based Targets initiative (SBTi) and is currently implementing its formal climate and emissions-reduction roadmap. It reflects Acolad's intention to manage the challenges associated with climate change in line with regulatory requirements and stakeholder expectations.

Acolad's environmental targets and initiatives are reviewed by the Group Executive Committee and supported by the external climate experts. Policies and commitments related to the Group's climate action plan are approved by the CEO. Acolad is currently working with external climate experts to formalise its transition plan in line with science-based requirements, with the intention to submit its targets to the Science Based Targets initiative (SBTi) for validation in 2026.

In order to achieve these targets, Acolad has put in place an action plan to reduce its scope 1 and 2 carbon emissions, based on the following actions:

- Acolad is working to reduce emissions from its offices by optimising building footprints and integrating coworking solutions where appropriate. This includes consolidating sites, prioritising modern and energy-efficient facilities, and promoting flexible work arrangements to minimise unnecessary energy consumption. By enhancing space efficiency and reducing under-utilised areas, the Group actively lowers operational emissions across its global footprint;
- The Group is progressively implementing energy-efficiency initiatives to reduce the energy consumption of its offices. This includes upgrading lighting systems, encouraging responsible day-to-day energy behaviour, and prioritising energy-efficient equipment when renewing infrastructure. As most offices are managed through external facility providers and connected to national energy grids, Acolad is also exploring opportunities to switch to renewable energy sources where and when feasible. These efforts are supported by internal communication and awareness programs that promote good energy practices across the organization;
- Acolad is reducing emissions linked to corporate cars by progressively withdrawing internal-combustion vehicles from its fleet and prioritising low-carbon mobility solutions. Starting in 2026, no new corporate vehicles will be added, and sustainable mobility alternatives, including mobility compensation mechanisms, will be deployed instead. For the existing fleet, electric vehicles will be introduced where and when relevant, while employees are encouraged to adopt environmentally friendly travel options, supporting the Group's broader shift toward greener business mobility.

From a financial perspective, energy-efficiency and energy-sobriety actions are expected to generate both short-term investment needs and long-term savings. In parallel, the transition of Acolad's company car fleet entails higher upfront costs, as leasing or acquiring electric vehicles remains more expensive than internal-combustion models. To manage this impact responsibly, the Group will adapt its vehicle catalogue and progressively reduce fleet size, while prioritising sustainable mobility alternatives. Where and when feasible, certain offices may also explore the installation of appropriate EV-charging infrastructure in coordination with facility leasing arrangements. These measures reflect a balanced approach that supports decarbonisation objectives while maintaining financial discipline.

As Acolad operates primarily as a tenant rather than a property owner, transitioning all offices to renewable electricity remains challenging in the short term. Nonetheless, the Group is committed to progressively reducing the climate impact of its electricity consumption by exploring renewable energy sourcing options where feasible, in line with local availability and facility leasing constraints. In addition, energy performance and access to renewable energy will be considered as key criteria when selecting or renewing office locations.

For scope 3, which represents 93% of the Group's total emissions in 2025, Acolad intends to reduce its emissions intensity through the following actions:

- Business travel emissions will be reduced by prioritising lower-carbon mobility and limiting non-essential trips. The Group promotes rail transport for suitable routes, encourages virtual meetings wherever practical, and reinforces internal travel guidelines to embed responsible mobility choices. These actions aim to maintain operational efficiency while progressively lowering the carbon intensity of business travel. A new business travel policy was enacted at the Group level;
- Acolad engages its suppliers, freelance linguists, and technology partners to support responsible procurement and help reduce emissions across the value chain. Ongoing collaboration progressively considers energy practices and environmental commitments, with open dialogue to encourage

alignment with climate expectations. The Risk and Compliance team conducts an annual review of Tier-one suppliers through the Group's internal assessment process, while contractual general terms administered by the Legal team include environmental and ethical requirements for suppliers and freelance partners. This framework aims to strengthen due diligence, promote continuous improvement, and gradually reduce upstream environmental impacts;

- Acolad is updating a new sustainable procurement policy and is currently drafting a Supplier Code of Conduct to encourage its suppliers to adopt a more responsible approach.

The financial approach to supporting Scope 3 emissions reduction is designed to remain proportionate and consistent with Acolad's operating model. Many planned measures focus on behavioural changes, efficiency improvements, and gradual process optimisation. These actions are expected to require limited additional investment. Steps such as extending equipment and hardware lifecycles, increasing digitalisation of internal processes, and adjusting office space use follow existing operational practices and contribute to cost efficiencies over time. Initiatives encouraging sustainable commuting and business travel are also expected to have a positive financial impact in the context of the Group's overall budget. Work to strengthen supplier-engagement procedures and related due-diligence processes is ongoing, and associated costs are expected to remain moderate. Acolad recognizes that future progress may require further capability development and cooperation with external partners. As actions progress, the Group will continue to provide transparency on financial aspects.

Overall, Acolad considers that the financial impact of its carbon-reduction program is expected to remain limited at Group level. As a result, no separate dedicated budget line has been established at this stage. Expenditures are incorporated within existing operational budgets and reviewed as part of the Group's ongoing financial planning process. This approach may be adjusted over time as actions evolve and additional needs are identified.

2.1.2.2 Material impacts, risks and opportunities and their interaction with strategy and business model (ESRS 2 SBM 3)

Climate-related risks, impacts and opportunities are considered within Acolad's business model through oversight from its administrative and management bodies, which regularly monitor progress and key developments. A climate-risk analysis was carried out with external expertise in 2023 - 2024 to identify potential risks across short-, medium- and long-term horizons. Building on this work, Acolad plans to further assess climate-related risks by considering potential financial and reputational implications, the likelihood of occurrence and the Group's level of influence. Future assessments are expected to be informed by recognised climate scenarios, including those aligned with IPCC methodologies, with support from external climate experts as part of the Group's broader climate and decarbonisation strategy.

As referenced in section 2.1.2.1, climate-related targets and initiatives are reviewed by the Group Executive Committee and supported by external climate expertise. Policies linked to the climate action plan are reviewed and approved by the Chief Executive Officer. Acolad is currently working with external climate experts to formalise its transition plan in line with science-based requirements, with the intention to submit its targets to the Science Based Targets initiative (SBTi) for validation in 2026.

Acolad plans to introduce a direct incentive mechanism for senior management linked to climate-change mitigation, under which a portion of remuneration will be tied to progress on greenhouse-gas emissions reduction within the next two years. Climate-related risks are also incorporated into the Group's risk-mapping process, reflecting their integration into strategic planning and the broader business model.

Regarding the resilience to climate change, please refer to 2.1.3.1.

2.1.3 Management of impacts, risks and opportunities & metrics and targets

2.1.3.1 Description of the processes to identify climate-related impacts, risks and opportunities (ESRS 2 IRO-1

The process for identifying material impacts, risks, and opportunities is described in section 1.4.1 "General Disclosures (ESRS 2)," and the time horizon is outlined in section 1.1.2 "Disclosures in Relation to Specific Circumstances (BP-2)" of this Sustainability report.

A resilience analysis was carried out in 2023 on Acolad's operating scope. This analysis revealed a limited financial impact for physical risk.

As a service-sector company, physical risks, particularly the increasing intensity and frequency of extreme weather events such as storms, floods, and heat waves, are mainly linked to Acolad's office buildings. Within its value chain, physical risks are primarily associated with data centers operated by cloud providers. As for transition risks, these mainly concern the potential shift in demand towards AI-based translation from conventional human translation, which may lead to increasing energy consumption.

The assessment of physical and transition risks related to environmental and climate issues is listed in the following tables:

Physical risks	Impact	Opportunities	Horizon	Mitigation
Acute risks: The potential financial impact of extreme climate events has increased the cost of facility operation due to rehabilitation costs after a climate event and business disruptions; Employees working in some offices that may more exposed could see their working environment damaged (e.g., floods, storms impacting office buildings); Out-of-service data centres could affect service continuity for clients and the normal functioning of the company (e.g., extreme weather events disrupting power or cooling systems)	Acolad's activities generate carbon emissions, including those linked to services purchased and other Scope 3 sources, which contribute to broader climate risks. The Group's business may be affected or interrupted in regions more prone to extreme weather events, which could disrupt service delivery, particularly in areas relying on external infrastructure such as service platforms. Major and severe climate events may also personally and professionally affect employees in impacted regions, potentially influencing their safety, living conditions, and working environment.	• Positioning low-impact digital and language services as resilient solutions for clients seeking to mitigate climate-related disruption • Developing physical and mental-wellbeing programs that help employees cope with climate-related stress and hazards • Leveraging ISO 14001 implementation to anticipate risks and enhance environmental management practices	Short/ medium-term	• Integration of climate criteria into supplier due-diligence processes • Business continuity and IT disaster-recovery plans tested • Employees equipped for secure remote work capabilities to maintain service delivery • Diversified office footprint and backup service platforms
Chronic risks: Increase in global temperature.	Changing global temperatures and long-term climate shifts may increase energy needs for heating and cooling in offices, particularly in regions experiencing more frequent heatwaves or extreme seasonal variations. Higher electricity demand could raise operational costs, especially in countries facing energy-market volatility. Climate-related stressors may also affect employee well-being in impacted regions, potentially influencing productivity and working conditions over time.	• Enhancing energy-efficiency programs to optimise building performance and reduce energy consumption • Prioritising modern, efficient offices and future relocations in regions with resilient energy infrastructure and lower environmental risks • Developing flexible and remote-work policies that reduce reliance on physical office cooling/heating • Strengthening supplier and facility-selection criteria to favour buildings with strong environmental performance and renewable-energy access	Medium/ long-term	• Optimisation of office footprint and use of energy-efficient spaces where feasible • Promotion of responsible energy use and employee awareness • Remote-work readiness to ensure continuity during extreme-temperature periods • Integration of energy-efficiency and climate-resilience criteria into future office-leasing decisions

Transition risks	Impact	Opportunities	Horizon	Mitigation
Existing regulations	Compliance with environmental and climate-related regulations (e.g., energy efficiency, emissions management, reporting requirements in the EU and UK) may require operational adjustments and increased monitoring.	• Strengthening a systematic environmental management approach by aligning internal processes with recognised standards such as ISO 14001 • Reinforcing stakeholder confidence through transparent reporting and demonstrable compliance with regulatory obligations	Short/ Medium-term	• Ensure compliance with national and international environmental regulations • Maintain internal controls to meet reporting standards • Monitor regulatory developments and adjust internal processes accordingly
Emerging regulations	Increasing sustainability regulations (e.g., CSRD, energy audits, carbon pricing, business-travel rules) may affect operational processes and cost structures.	• Enhancing preparedness for future regulatory requirements by building internal systems, governance structures, and reporting capabilities aligned with CSRD and other emerging frameworks • Advancing data quality, traceability, and audit readiness, strengthening the Group's ability to meet both customer and regulatory expectations for sustainability data • Improving long-term strategic planning by anticipating regulatory shifts and integrating sustainability considerations into operational and financial decision-making processes	Medium/ Long-term	• Integrate emerging regulations into sustainability strategy and roadmap • Publish ESG disclosures and align with regulatory frameworks • Review directives and practices within CSR and Risk Committees and conduct regular regulatory monitoring • Integrate environmental criteria into procurement
Technological risks	Technology evolution (AI platforms, digital infrastructure, data storage) may increase energy use and lifecycle costs, requiring adaptation to remain operationally efficient and compliant.	• Expanding adoption of energy-efficient digital solutions and cloud infrastructure to optimise system performance • Encouraging circular digital practices, including extending hardware lifecycles and supporting responsible equipment reuse when possible, for reducing waste and resource consumption • Strengthening collaboration with technology partners and monitor continuous improvement in IT sustainability practices	Short/ Medium-term	• Development a Green IT Policy and lifecycle management

Market risks	Evolving client expectations for ethical, low-carbon, secure, and responsible technology and language-services solutions may affect competitiveness.	• Positioning responsible, low-impact, and secure digital and language-service models that respond to client sustainability requirements • Strengthening commercial dialogue with clients by demonstrating credible climate action and transparent reporting • Integrating sustainability into client proposals and delivery frameworks, helping address emerging client expectations	Medium/ Long-term	• Monitor client sustainability expectations and market trends • Work with suppliers and partners to support sustainability performance

2.1.3.2 Policies related to climate change mitigation (E1-2)

Acolad has implemented climate-related policies that support the reduction of emissions and the integration of environmental considerations into Group operations and decision-making. Climate topics are embedded within the Group CSR Policy, which outlines expectations regarding carbon footprint management, energy efficiency, mobility practices, responsible procurement, and awareness-raising across the workforce and business partners. These policies apply across all Group entities and are designed to support progress toward Acolad's science-based decarbonisation trajectory and regulatory requirements. The Group monitors progress through annual carbon accounting aligned with the GHG Protocol and ESG reporting in line with applicable requirements, including CSRD and CDP. As of 2025, two Acolad entities are ISO 14001 certified, representing 12% of the workforce.

Responsibility for climate-related policy oversight lies with senior governance bodies, including the management operation board, the Executive Committee, and the CSR Committee. The CSR team coordinates implementation, monitors progress and contributes to climate-scenario work and decarbonisation planning. Acolad aligns its climate-related work with recognised frameworks such as the GHG Protocol, UN Global Compact principles, and its commitment to the SBTi with associated work underway to define and implement its formal science-based transition pathway.

Acolad has established operational policies supporting emissions reduction. Office relocations consider factors such as energy-efficiency performance, environmental certification where available, and access to public transport. The Group updated its company car and mobility policy to gradually shift towards lower-emission alternatives and phase out corporate vehicles by 2030. The travel policy encourages the use of train travel for journeys under five hours and the use of virtual meetings where appropriate.

These policies contribute to managing environmental impacts and climate-related risks connected to Acolad's activities. Work continues to integrate climate considerations into daily operations and long-term planning where relevant and feasible. Acolad communicates its climate-related policies through internal channels, including intranet and group communications, and externally via ESG reporting and public commitments. Work continues to strengthen internal governance, supplier engagement, and performance monitoring as part of the Group's climate-transition pathway and planned SBTi submission in 2026.

2.1.3.3 Actions and resources in relation to climate change policies (E1-3)

Various actions have been undertaken to reduce Acolad's overall carbon footprint. These measures align with the Group's 2030 and 2050 climate objectives and will continue to be implemented and adjusted as needed as part of Acolad's pathway toward net-zero emissions by 2050. Efforts such as improving the energy efficiency of office spaces, raising employee awareness on environmental matters, and relocating key headquarters to more efficient buildings have supported progress in reducing scopes 1 and 2 emissions, as most of these emissions result from fuel consumption from the vehicle fleet and office energy use, Acolad introduced a new company-car policy in 2025 to progressively transition to electric vehicles and aims to phase out all corporate vehicles by 2030. This initiative is being supported through regular coordination meetings between HR, Finance, and CSR teams, together with relevant local entities.

In 2025, scope 1 and 2 emissions decreased by 67%, representing a reduction of 527 tons of CO_2eq compared with 2023, driven primarily by:

- electrification of the corporate car fleet;
- improved building management, including reduced grid-electricity consumption and optimised office space and sustainable relocation.

In 2025, scope 3 emissions accounted for 93% of the total carbon footprint (tons of CO_2eq).

The Group is continuing assessing the contribution of various reduction levers for scope 3 categories. In 2024, the implementation of an updated business-travel policy and a Green IT policy is expected to support a decrease in scope 3 emissions intensity.

As employee engagement plays a key role in the success of environmental initiatives, Acolad has launched its first Group-wide workshop in 2024 and will continue deploy e-learning program on environmental and social topics through its HR learning management system. A completion-rate KPI will be established to monitor progress.

Purchased goods and services represented approximately 59% of Acolad's total carbon footprint in 2025. To address this, Acolad is

reinforcing Scope 3 emissions management by integrating environmental and ethical requirements into supplier and vendor contractual annexes, and by strengthening supplier engagement and value-chain due-diligence processes. ESG criteria are being progressively embedded into procurement practices, including through supplier qualification questionnaires and certification assessments. These actions are aimed to support more responsible purchasing practices and contribute, over time, to the reduction of upstream environmental impacts.

2.1.3.4 Targets related to climate change mitigation (E1-4)

Acolad's climate commitments are aligned with the Science Based Targets initiative (SBTi) and the global ambition to limit temperature increase to 1.5°C. The company formally submitted its SBTi commitment in 2024 and is currently establish near-term reduction targets by 2030, with a long-term Net Zero objective by 2050 with external climate experts. A 2023 Group-wide carbon footprint assessment, prepared in accordance with the GHG Protocol, serves as the baseline year for tracking future progress across Scopes 1, 2 and 3.

The Group's decarbonisation approach is progressively being structured, focusing on mobility, office energy efficiency, digital practices, and value-chain engagement. Internal actions are complemented by external expert input to refine methodologies and develop a credible transition pathway.

Progress against targets will be reassessed annually. As part of this process, the company will document any changes related to baseline, scope or methodology to ensure transparency and comparability over time.

Acolad's near-term climate targets for 2030

In preparation for SBTi target validation, Acolad has initiated emissions-reduction actions covering its direct operations and value chain. These efforts contributed to a reduction in total emissions of 23% between 2023 and 2025, representing a decrease from 5,330 tCO_2e to 4,109 tCO_2e.

Key levers under deployment include:

- Transitioning the vehicle fleet away from internal-combustion vehicles, with no new ICE vehicles from 2026 and a phase-out targeted by 2030
- Optimising office space and prioritising modern, energy-efficient buildings in leasing decisions
- Reducing business-travel emissions, notably through the Group travel policy promoting train use for journeys under five hours and increased virtual collaboration
- Strengthening supplier ESG due-diligence through contractual clauses, qualification & certification questionnaires, and engagement
- Developing a Group Green IT Policy focused on digital efficiency and extending hardware life cycles
- Providing CSR training and awareness programs to build employee engagement.

Scope 3 remains the largest contributor, representing 91% of Acolad's footprint in 2025, with purchased goods and services accounting for 53% of total emissions. The company is enhancing its supplier engagement and procurement governance to progressively reduce upstream impacts.

Acolad's long-term climate objectives (2050): Net-zero

Consistent with its sustainability commitments, Acolad aims to reach Net Zero greenhouse-gas emissions by 2050. The long-term pathway will be formalised through the SBTi validation process. A structured roadmap will be developed by 2026, supported by external expertise and digital climate-scenario tools.

The long-term ambition includes:

- Reducing Scope 1 and 2 emissions through fleet electrification and higher building-efficiency standards
- Managing Scope 3 emissions through responsible procurement, supplier due-diligence, and digital-efficiency programs
- Considering renewable-energy sourcing options where feasible in leased buildings
- Strengthening climate-risk integration into business planning and governance
- Using high-quality removals only for residual emissions after deep decarbonisation

Interim milestones will be established to monitor progress and support gradual implementation.

2.1.3.5 Energy consumption and mix (E1-5)

Acolad has been working on reducing its energy consumption since 2022. These efforts focus on two main areas: progressively improving the energy management of existing buildings and relocating offices to more energy-efficient facilities, as well as optimising and rationalising office space.

To improve energy efficiency and reduce energy consumption, one of our major headquarters was relocated to a more energy-efficient building with environmental-friendly characteristics and close proximity to public transportation.

Most of Acolad's offices are located in Europe and North America, where energy supply is largely dependent on national electricity grids and where buildings comply with demanding environmental standards, including France, Finland, Sweden, Portugal, and Singapore. Some offices have transitioned to renewable-electricity sourcing. Several sites have upgraded to energy-efficient LED lighting, and others have implemented presence sensors systems to help reduce energy consumption in the buildings we occupy.

Energy consumption [E1-5] & renewable energy table [E1-5]

kWh	2024	2025
Consumption of electricity, heat, steam, and cooling purchased or acquired from renewable sources (kWh)	95,022	564,240
Total renewable energy consumption (kWh)	95,022	564,240
Share of renewable sources in total energy consumption (%)	6.26%	53.16%
Total energy consumption (kWh)	1,516,878	1,061,398

Primary data on energy consumption across Acolad's entities is collected through its annual environmental reporting cycle and centralised digital ESG data platform. This system supports the consolidation and monitoring of energy data at Group level.

In 2023, data collection was supported by an external consultancy, and certain figures were estimated due to the late availability of invoices or energy charges included in landlord service fees. In 2024, the Group deployed a dedicated digital ESG data platform to streamline reporting and improve data completeness. However, in a limited number of sites, energy invoices were not yet fully available at the time of reporting, and estimates were applied where necessary based on local electricity grid factors.

Acolad's electricity consumption primarily reflects the mix of energy sources from national grids in the countries where the Group operates. Renewable and fossil energy shares are therefore influenced by local electricity generation profiles.

The reduction in total energy consumption between 2023 and 2025 is mainly explained by the Group's continued office optimisation efforts, including the rationalisation of workspace, relocation to more energy-efficient premises, and the gradual transition toward flexible and shared office solutions in selected locations.

Decarbonizing the company fleet

In 2024, Acolad implemented a new car policy to gradually transition its fleet from predominantly fossil fuel-based cars to electric cars by 2026 and phasing out all fleet by 2030.

2.1.3.6 Gross scopes 1, 2, 3 and total GHG emissions (E1-6)

Acolad's GHG emissions are calculated according to the GHG Protocol and monitored using the market-based carbon emissions indicator. Whenever possible, local emission factors have been used to establish GHG emissions, and when this was not possible, international databases were used (such as the IEA, ADEME or DEFRA).

Recognizing that carbon footprint calculation is an evolving science, Acolad remains committed to continuously refining its methodology to incorporate the latest scientific insights, emissions factors, and industry best practices. It should be noted that the measurement of Acolad Group's impact on greenhouse gases is limited to the carbon impact, given that greenhouse gas emissions other than CO2 are not significant.

Methodological note: The carbon footprint is fully aligned with the requirements of the CSRD directive (Corporate Sustainability reporting Directive) and strictly follows the GHG Protocol methodology, which is internationally recognized for the calculation and management of greenhouse gas (GHG) emissions. In accordance with the international standards of this methodology, we carried out an exhaustive analysis of our direct emissions (Scope 1) from our own corporate cars, as well as our indirect emissions related to the consumption of electricity, heat or steam (Scope 2). In addition, we have extended our analysis to indirect emissions upstream and downstream of our value chain (Scope 3), including purchased goods and services, capital goods, fuel- and energy- related activities not included in Scope 1 or Scope 2, upstream transportation and distribution, waste generated in operations, business travel, employee commuting, upstream leased assets but also end-of-life treatment of sold products. However, downstream transportation and distribution, processing of sold products, use of sold products, downstream leased assets, franchises and investment are not applicable to our organisation.

SCOPE 1 & 2: 2025 EMISSIONS AND ANNUAL PROGRESS IN ABSOLUTE VALUE (E1-6)

Emissions (in tCO2eq.)	2024	2025	2024-2025 change (%)
Scope 1	101	102	+1%
Scope 2	293	163	-44%
Market-based emissions	445	305	-31%
Location-based emissions	293	163	-44%
Sub-total emissions			
(scope 1 & 2 market-based)	**546**	**407**	**-25%**
Sub-total emissions (scope 1 & 2 location based)	**394**	**265**	**-33%**

Between 2023 and 2025, Acolad's Scope 1 and Scope 2 emissions decreased by 170 tCO_2e and 357 tCO_2e respectively. These reductions represent an overall decrease of around 67% compared with the 2023 baseline. This progress reflects the implementation of the initiatives described in previous sections, including fleet electrification, office space optimisation, and improved energy management.

Scope 3: 2025 emissions and annual progress in absolute value (E1-6)

Acolad's Scope 3 emissions encompass several categories of indirect emissions arising from its value chain. These include purchased goods and services, capital goods, fuel- and energy-related activities not included in Scopes 1 or 2, upstream transportation and distribution, waste generated in operations, business travel, employee commuting, upstream leased assets, and the end-of-life treatment of sold products. Each category is quantified using relevant data sources and appropriate emission factors to ensure reliable calculation of associated greenhouse gas emissions.

Primary data sources include Acolad's internal ESG reporting platform, Group accounting systems, company fleet and IT asset inventories, and an employee commuting survey. In 2023, Acolad calculated its GHG emissions with support from an external expert, applying standard emission factors from recognised

databases such as ADEME and DEFRA. In 2024, Acolad adopted a digital ESG and data platform to further streamline the process and enhance consistency; this platform incorporates emission-factor sources including ADEME, CDP, IEA, Eurostat, AGRIBALYSE, DEFRA, Exiobase, and Fraunhofer. This methodology supports broad coverage of emissions across Acolad entities, with annual reviews and extrapolations applied as needed to maintain completeness and mitigate double-counting risks.

In 2025, approximately 47% of Scope 3 emissions were calculated using primary data.

Emissions *(in tCO_2eq)*

Scope 3	Description	2024	2025	2024-2025 change (%)
3.1 Purchased goods and services	GHG emissions associated with goods and services purchased by Acolad. This mainly includes outsourced linguistic vendor services, cloud and digital technology services, software licences, IT support, marketing services, and professional services. As a service-based business, this category represents the largest share of Acolad's Scope 3 emissions.	2,431	2,418	-1%
3.2 Capital goods	Emissions generated from the production and acquisition of capital goods, such as company-owned cars, office furniture and IT equipment.	117	88	-25%
3.3 Fuel- and energy-related activities (not included in scope 1 & 2)	Emissions associated with the extraction, production, and transportation of energy purchased by Acolad, including electricity transmission and distribution losses.	59	63	+7%
3.4 Upstream transportation and distribution	GHG emissions related to the transportation of goods and materials purchased by Acolad and distribution of materials to company sites.	21	22	+5%
3.5 Waste	GHG emissions associated with treatment of waste from Group offices and Ubiqus Badges.	109	63	-42%
3.6 Business travel	Emissions associated with employees' business travel, including air travel, rail travel, taxi/ride-hailing, and hotel stays.	752	654	-13%
3.7 Employee commuting	Emissions generated from employees commuting between their homes and workplaces. This includes all commuting modes, collected via employee survey.	465	400	-14%
3.8 Upstream leased assets	The upstream leased assets include the emissions generated from the operation of assets that are leased not included in the scope 1 or scope 2 inventories. Such as offices and vehicles.	264	133	-50%
3.9 Downstream transportation and distribution	GHG emissions associated with the downstream transportation of products and services sold. This category is not relevant to the Group.	N/A	N/A	N/A
3.10 Processing of sold products	Not relevant to the Group as Acolad does not have GHG emissions associated with the processing of intermediate products by third parties.	N/A	N/A	N/A

Emissions *(in tCO_2eq)*

Scope 3	Description	2024	2025	2024-2025 change (%)
3.11 Use of sold products	Not relevant to the Group as Acolad does not have direct GHG emissions associated with the use of its services by end consumers.	N/A	N/A	N/A
3.12 End-of-life treatment of sold products	GHG emissions associated with the disposal and treatment of waste from sold Ubiqus badges' products at the end of their life.	4	2	-50%
3.13 Downstream leased assets	Not relevant to the Group as Acolad does not own any assets that are leased by other entities.	N/A	N/A	N/A
3.14 Franchises	Not relevant to the Group as Acolad has no franchises or stores.	N/A	N/A	N/A
3.15 Investments	Not relevant to the Group, as Acolad does not manage investment portfolios that would generate associated emissions.	N/A	N/A	N/A
3.16 Other indirect emissions		N/A	N/A	N/A
Sub-total emissions (scope 3)		4,222	3,844	-9%

The GHG footprints for 2023 and 2025 were performed using two different service providers: the 2023 assessment was conducted by an external consultant, while the 2025 assessment was carried out using a digital carbon accounting platform that applies robust emissions factor databases and streamlines data collection to enhance accuracy. As a result, some variations may appear across certain sub-categories of emissions. In addition, the 2025 GHG report was reviewed and audited by an independent third party.

GROUP CARBON FOOTPRINT (ALL SCOPES INCLUDED) IN ABSOLUTE VALUE AND PER REVENUE (1) (E1-6)

Description	2024	2025	2024-2025 change Emissions (in tCO2eq.)	2024-2025 change (%)
Total GHG emissions (location-based) (in tCO2eq.)	4,616	4,109	-507	-11%
Total location-based GHG emissions per revenue (in tCO2eq./millions of euros)	19.4	19.51	+0.11	+0.57%
Total GHG emissions (market-based) (in tCO2eq.)	4,768	4,251	-517	-11%
Total market-based GHG emissions per revenue (tCO2eq./millions of euros)	20.11	20.19	+0.08	+0.40%

In 2025, revenue totaled € 210,601,000 (Consolidated income statement).

2.1.3.7 GHG removals and GHG mitigation projects financed through carbon credits (E1-7)

Acolad as a professional services company with a relatively low direct climate impact. In line with the ESRS requirement to prioritise real emissions reductions, our decarbonisation approach focuses on reducing emissions within our own operations and across our value chain. We are currently prioritising energy efficiency, business travel reduction, renewable electricity where feasible, and supplier engagement to achieve direct emissions reductions.

For the reporting period, Acolad did not purchase carbon credits or finance carbon removal projects to compensate for greenhouse gas emissions, nor did the Group retire or hold any carbon units. We have not used carbon removals or avoidance credits to achieve our climate-related targets.

3 Social data

People are at the core of Acolad's business model, and the Group recognises that its employees are essential to delivering high-quality services and supporting long-term performance. In a fast-evolving environment, Acolad's teams continue to demonstrate adaptability, client focus, and commitment to innovation across content and language solutions. Social topics are therefore central and material for the Group, as talent, expertise, and engagement are key enablers of sustainable growth and operational resilience.

Acolad's people strategy and HR policies are designed to support the Group's transformation, organisational objectives, and operational needs. These policies are implemented at both global and local level, reflecting the specific context of each country, including regulatory frameworks, cultural dynamics, and organisational requirements. The HR department, under the oversight of the Executive Committee, coordinates Group-wide processes, promotes common principles, and supports consistent standards, while enabling flexibility for local needs. This approach aims to balance consistency with flexibility, foster collaboration, and create a work environment that supports employee development, wellbeing, and performance.

3.1 Own workforce (ESRS S1)

3.1.1 Strategy

3.1.1.1 Interests and views of stakeholders (ESRS 2 SBM-2)

Section 1.3.2 of this report outlines how the interests, views and rights of Acolad employees are taken into consideration.

Acolad seeks to regularly understand and integrate employee perspectives to support well-being, engagement, and professional development. Feedback is gathered through employee opinion survey, individual performance discussions, internal workshops and meetings, and informal feedback channels across entities. The Group also promotes open dialogue through HR and local management teams to address employee expectations and working conditions. These practices help Acolad identify emerging needs, monitor satisfaction, and manage social-related risks and opportunities, contributing to a supportive and collaborative work environment.

3.1.1.2 Material impacts, risks and opportunities and their interaction with strategy and business model (ESRS 2 SBM-3)

The impacts, risks and opportunities related to Acolad's workforce are closely connected to its business model. As a global content and language solutions provider operating in a fast-evolving digital environment, Acolad's talent is a core strategic asset. The Group relies on diverse and skilled teams to support client delivery, drive innovation, and accompany technological developments across its markets.

Attracting, developing and retaining qualified professionals, particularly in technological, language, and operational roles, remains important to support long-term performance and competitiveness. Acolad leverages both internal talent and a network of freelance linguists and expert collaborators, who are considered "non-employees" in ESRS terminology, to respond to client needs and market dynamics.

Given the nature of Acolad's business, with a workforce primarily composed of professional and support functions, the risk of forced labour or child labour is considered low. Nonetheless, the Group maintains internal compliance processes and supplier due-diligence mechanisms to uphold ethical and responsible employment practices across its value chain.

3.1.2 Processes for engaging with own workers and workers' representatives about impacts (S1-2)

Acolad promotes regular and constructive dialogue with its employees and their representatives to ensure that their views and expectations are considered in organisational decisions. The Group's culture encourages openness, collaboration, and initiative, which supports transparent communication and enables employees to express feedback on workplace topics, operational changes, and company initiatives.

Engagement takes place through several channels, including manager check-ins, team meetings, internal communication tools, and structured employee opinion survey. These exchanges support continuous improvement by helping to identify needs, inform decision-making, and align initiatives with workforce expectations. They also contribute to maintaining a positive working environment, reinforcing trust, and supporting employee engagement.

By fostering this dialogue, Acolad is able to anticipate potential concerns linked to organisational changes, support employee understanding of strategic priorities, and help reduce risks associated with disengagement or resistance to change.

The various formats for engaging with own workers and workers' representatives:

Format	Frequency	Function
Group-level townhalls	Several times per year	The Board and management teams provides updates on strategy, business performance, transformation initiatives, and key organisational topics. Employees have opportunities to ask questions and share feedback.
Local works councils / employee representative meetings	Frequency varies by country (e.g., monthly or quarterly)	Employee representatives are consulted on workplace matters, organisational changes, and working conditions in line with local legal requirements. Meetings enable dialogue on employment issues and collective interests.
Employee opinion survey	Several times per year	Surveys help collect employee feedback on workplace experience, engagement, culture and operational topics. Results guide improvement actions locally and at Group level.
Annual performance reviews	Twice per year	Employees and managers discuss performance, goals, career development and learning needs. Mid-year or ongoing check-ins may complement the annual process in certain entities.
HR dialogue and employee support channels	Throughout the year	HR teams provide day-to-day support to employees, addressing workplace questions, internal mobility topics, well-being concerns and development needs. Sessions may be individual or group-based depending on topics and regions.
Internal communications	Regular, daily to weekly depending on topic	Group-wide communications delivered via email, intranet and Microsoft teams, covering key themes such as business successes, CSR initiatives, industry insights, Acolad Life updates, corporate announcements, events, and people-focused stories. Supports transparency, alignment, and employee engagement across all regions.
Internal training programs	Throughout the year	Learning and development programs support professional skills, managerial development, digital capabilities, compliance, and CSR-related topics. Delivered through internal and external platforms.
CSR Committee	Four times per year	Cross-functional Group-wide committee chaired by CSR. Ensures integration of sustainability priorities, oversight of ESG programs, supports decision-making and alignment across business functions.
Risk Committee	Four times per year	Reviews strategic, operational, cyber and compliance risks, including people-related matters. Ensures risk mitigation and contributes to internal control and resilience planning.
Internal societal, inclusion, festival and cultural events	Throughout the year	Engagement initiatives promoting social responsibility, diversity & inclusion, cultural exchange, and community spirit. Events aim to strengthen belonging, awareness and employee participation across the Group.

Growth Summit	Once per year	Group-wide leadership and commercial event focused on strategy, innovation, collaboration and market positioning. Brings together senior leaders and cross-functional teams to align on growth priorities, strengthen commercial excellence and share best practices.

3.1.3 Processes to remediate negative impacts and channels for own workers to raise concerns (S1-3)

Acolad is committed to upholding the highest standards of ethics, integrity, and respect for human rights across its operations. The Code of Conduct & Ethics sets out clear principles to prevent discrimination, harassment, corruption, conflicts of interest, and human rights violations, while promoting a safe, inclusive, and respectful work environment. All employees are informed of these commitments and must acknowledge the Code upon joining the company. The same requirements apply to non-employees when legally applicable. The Group complements this framework with dedicated internal policies and proactive awareness initiatives that reinforce ethical behavior and responsible conduct.

To ensure employees have access to secure channels to raise concerns, Acolad has established multiple reporting pathways. As a first step, workers are encouraged to discuss concerns with their line or functional manager or HR representative. If this is not possible or effective, employees can confidentially report concerns through the Group's Whistleblowing Procedure, established in accordance with the French Sapin II anti-corruption law, ensuring protection under a strict non-retaliation policy. Reports may be made to the internal Whistleblowing Procedure Officer or via the external whistleblowing form accessible on Acolad's website. Anonymous reporting is permitted and processed when sufficient information is provided.

A formal governance structure ensures impartial handling of concerns. Reports are reviewed by the Whistleblowing Management Committee, composed of the Legal Director and Chief People and Culture Officer, with additional experts involved where relevant. All alerts are acknowledged within statutory timeframes and followed by a structured assessment, investigation, and remediation process, ensuring strict confidentiality for all parties. Data related to whistleblowing cases is handled in accordance with GDPR and retained only as required by law.

In 2025, internal systems and governance structures continued to operate effectively, enabling employees and external stakeholders to report misconduct or potential violations safely and securely. 0 reports were submitted via the whistleblowing system. Acolad remains committed to preventing negative impacts, continuously strengthening ethical safeguards, and fostering a culture where issues can be raised openly and addressed proactively.

3.1.4 Measuring the effectiveness of implemented actions

Acolad contributes to employment and skills development across the countries where it operates. With a presence in Europe, North America and APAC selected international markets, the Group maintains a diverse workforce combining in-house teams, specialised talent, and an extended network of expert partners. This structure supports operational continuity and flexibility while enabling Acolad to deliver high-quality language and content solutions to its customers.

Reflecting the nature of the language and services sector, Acolad's workforce is predominantly female. Women represent a significant majority of employees, and 64% of managerial roles are held by women. The Group continues to promote fair and inclusive career development opportunities across all functions and levels.

The company regularly invests in talent development and recruitment, helping strengthen expertise in technology, sales, production, project management and emerging skills related to AI-enabled workflows and digital services. Internal mobility and continuous learning initiatives support employees in adapting to evolving stakeholder needs and industry developments.

Workforce data is consolidated at the end of the reporting period through the Group's internal HR information and management systems. Data collection is coordinated by the HR Department, using structured processes to gather information from all operating entities. Internal quality checks ensure completeness and accuracy. This approach ensures transparent and consistent reporting in line with regulatory expectations and internal governance standards.

In addition to defined HR and people-related objectives, Acolad has established monitoring and evaluation mechanisms to assess the effectiveness of its initiatives. These systems ensure continuous improvement and alignment between employee expectations, organisational priorities and workplace culture. They also support informed decision-making and help guide future people programmes across the Group.

Workforce indicators tracking

Acolad regularly tracks key human capital indicators at Group level, including turnover, absenteeism, internal mobility and participation in training programs. These indicators provide visibility on the impact of initiatives designed to promote employee engagement, development and retention, and they support proactive workforce-related planning and management.

Employee feedback and engagement

Acolad conducts periodic employee opinion survey to gather feedback on workplace experience, well-being and organisational culture. These surveys complement ongoing feedback channels such as performance discussions, town halls and team meetings, enabling employees to express views and participate in shaping internal initiatives.

Cross-functional collaboration

HR, Marketing, CSR and business teams collaborate through internal forums and working groups. These sessions promote alignment across countries and functions, facilitate sharing of best practices and collective initiatives.

3.1.5 Description of characteristics of Acolad's employees and non-employees (S1-6 and S1-7)

Acolad currently has 1,495 employees, with a gender balance of 37% men and 63% women.

The metrics in section 3.1.5. cover 100% of the company's workforce.

TABLE 1: EMPLOYEES' WORKFORCE INFORMATION BY EMPLOYEMENT CONTRACT, GENDER

Contract type	Female	%	Male	%	Total
Permanent contract	922	64.03	518	35.97	1440
Fixed-term contract	19	34.55	36	65.45	55
Not reported	0	0.00%	0	0.00%	0
TOTAL	**941**	**63**	**554**	**37**	**1,495**

TABLE 2: EMPLOYEES' WORKFORCE INFORMATION ON TYPE OF EMPLOYEMENT, GENDER

Employment type	Female	Male	Weight	Total
Full-time contract	746	448	80%	1,194
Part-time contract	195	106	20%	301
Not reported	0	0	0%	0

TABLE 3: EMPLOYEES' WORKFORCE INFORMATION BY EMPLOYEMENT CATEGORY, GENDER

Employment category	Female	%	Male	%	Total
Executive management	3	37.5	5	62.5	8
Senior Leaders	17	73.9	6	26.1	23
People Managers	43	63.2	25	36.8	68
Not reported	0	0	0	0	0
TOTAL	**941**	**63**	**554**	**37**	**1,495**

TABLE 4: EMPLOYEES' WORKFORCE INFORMATION BY EMPLOYEMENT CONTRACT, AGE

Contract type	<30	30-50	>50	Not reported	Total
Executive management	-	3	5	-	8
The rest	205	904	368	-	1477
Unknow	-	-	-	10	10
TOTAL	**205**	**907**	**373**	**10**	**1,495**

TABLE 5: EMPLOYEES' WORKFORCE INFORMATION BY COUNTRY IN WHICH EMPLOYEES REPRESENT AT LEAST 10% OF THE TOTAL WORKFORCE

Country	Weight	Total

Finland	11%	159
France	26%	386

In 2025, the total number of employees who left the undertaking was 357 representing an employee turnover rate of 17% in the reporting period.

The turnover rate is calculated by dividing the total number of employee departures, including permanent contracts and fixed term contracts, by the total workforce at the end of the reporting year.

The integration of a non-employee workforce continues to provide Acolad with essential flexibility to adapt to project requirements and market dynamics. This flexible model enables the Group to adjust resources, address specific business needs and maintain operational agility, particularly in specialised projects or technology focused areas.

During 2025, Acolad engaged more than 700 non-employee workers who supported various functions across the organisation. All relevant information relating to this external workforce is recorded and monitored through the Group's HR information and management systems. These figures reflect the workforce composition as of 31 December 2025 and illustrate the evolution of both internal and external resources throughout the year.

Interns and apprentices are included within employee workforce data. Their number remains limited, representing approximately 0.6% of Acolad's total workforce as of 31 December 2025.

3.1.6 Human rights (S1-17)

3.1.6.1 Policy (S1-1)

Acolad is committed to respecting and promoting human rights in line with the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, and the fundamental conventions of the International Labour Organization (ILO). Our Human Rights Policy and Code of Conduct formally set out our responsibility to protect dignity, equality and freedom for all individuals connected to our business. Acolad ensures respect for the following fundamental principles:

- Freedom of association and the right to collective bargaining;
- Prohibition of forced, bonded or compulsory labour;
- Effective abolition of child labour;
- Non-discrimination in employment and occupation);
- Fair treatment, respect and dignity for all individuals.
- Acolad also reinforces its commitment through policies and actions covering: Freedom of speech; Safe and healthy working conditions; Prevention of harassment, violence and intimidation;
- Protection of privacy and personal data;
- Due diligence on human rights in our supply chain and business relationships.

These commitments apply to all employees and, where relevant, to contingent workers, suppliers and business partners. Acolad expects third parties to uphold the highest standards of integrity and human rights in line with our Code of Conduct and Ethics.

The Human Rights Policy is integrated into Acolad's Ethics & Compliance framework and supported by the CSR, HR and Legal teams. It is approved by the Executive Committee, demonstrating the strategic importance of human rights within our organization.

The policy has been communicated across the Group and is available internally to all employees. During onboarding, employees are required to acknowledge the Code of Conduct and Ethics and Human Rights Policy. Dedicated awareness initiatives, internal campaigns and HR guidance further support adoption.

Acolad ensures that local employment practices comply with national labour laws and international standards. Our HR teams work with local managers to ensure consistent application of these principles across all countries where Acolad operates.

A structured governance process supports the roll-out and monitoring of our human rights commitments. This includes dedicated procedures for due diligence, employee onboarding, recruitment, grievance mechanisms and whistleblowing systems. Regular internal reviews ensure alignment with evolving regulations, stakeholder expectations and industry best practices.

3.1.6.2 Actions (S1-4)

Acolad publishes its commitments to human rights and responsible business conduct through its Code of Conduct and Ethics and Human Rights Policy, which are aligned with the UN Global Compact principles and international conventions. These documents outline the expected standards of behaviour for employees, suppliers and partners, reinforcing Acolad's commitment to upholding human dignity, fairness and equality across its operations.

Publication of human rights commitments

Acolad's Code of Conduct and Ethics and Human Rights Policy have been implemented across the Group and form an integral part of employee onboarding. All employees had acknowledged these policies. The policies are publicly available on the Group's intranet and shared through internal communication channels to ensure broad accessibility and awareness.

Human rights and ethical risks are assessed as part of Acolad's broader risk management and compliance processes. Based on the current assessment and considering the nature of Acolad's activities, which are primarily professional services and knowledge-based functions located in countries generally considered low risk for human rights violations, no significant human-rights-related risks have been identified within Acolad's workforce to date. The Group remains attentive to potential risks and continues to monitor its operations and practices to support alignment with international standards.

Coordination of this policy

All new employees acknowledge the Code of Conduct and Ethics and Human Rights Policy are informed of Acolad's whistleblowing mechanism during onboarding. Awareness of the reporting channel is reinforced through internal platforms, policy documents and internal communications. Employees can access via:

- Intranet and internal communication channels;
- Group Code of Conduct and Ethics and Human Rights Policy available in the internal GMS (Global Management System);
- Onboarding materials and employee handbook support.

3.1.6.3 Incidents, complaints and severe human rights impacts (S1-5 and S1-17)

Acolad dedicates particular attention to preventing and managing any behaviour inconsistent with human rights principles, including discrimination, harassment or any form of unfair treatment. The Group is committed to maintaining a respectful and inclusive working environment, where all employees can work safely and without prejudice.

During the reporting period, Acolad did not record any incidents or complaints related to discrimination, harassment or other human-rights-related breaches across the organisation (S1-17).

No legal actions, fines or sanctions related to human rights or discrimination were reported (S1-17).

This outcome reflects the Group's ongoing efforts to promote responsible behaviour and raise awareness of ethical expectations among all employees through policies, training and internal communication. Acolad will continue reinforcing its prevention and monitoring mechanisms to support a respectful workplace culture and ensure grievances can be raised and addressed confidentially and without retaliation.

Link between metric and IRO	Description of the metric	Perimeter	2025 performance	Objective
Acolad has employees in 22 countries. As such, it shall prevent any potential violation of employees' rights (e.g., harassment and discrimination) as well as damage to employees' physical and mental well-being.	Number of severe human rights incidents affecting the undertaking's own workforce	Group + value chain	0 incidents	0 incidents in 2030
Clearly communicate the behaviors expected of employees and have them sign the Code of Conduct and Ethics as a statement of their commitment.	% of Company employees having signed the Charter of Ethics	All Group employees	60% of employees acknowledged the Code of Conduct and Ethics	100% of employees in 2026 and non-employees: 100% in 2030
Prohibit discrimination.	Number of documented cases of discrimination and harassment reported by the internal whistleblowing system Total number of documented incidents of discrimination, including harassment, reported over the past year	Group + value chain	0 incidents	Maintain our zero-incident record, while promoting case reporting in 2030
Prohibit human rights violations, including discrimination.	Total fines, penalties and compensation for damages resulting from discrimination and harassment complaints and incidents Total fines, penalties and compensation for damages resulting from severe human rights incidents	Group + value chain	€0	2030 target: €0

3.1.7 Social dialogue

Labor relations and social dialogue

Labor relations and social dialogue are important elements of Acolad's social strategy. The Group promotes a workplace culture based on respectful, transparent and constructive communication, supporting collaboration between management, employees and workers' representatives across locations.

Acolad fosters a climate of trust by encouraging open exchange and maintaining regular dialogue with social partners, employee representatives and relevant committees where applicable. This approach supports engagement, reinforces shared understanding and contributes to a positive working environment.

Maintaining constructive labor relations is essential for Acolad, given the nature of its business as a people-centred organisation.

Effective dialogue with employees and their representatives helps promote engagement, limit operational disruption and maintain a stable and collaborative workplace.

In line with this approach, Acolad encourages open communication on organisational developments, HR topics and workplace initiatives. Proactive engagement helps address potential concerns early, supports employee satisfaction and can reduce risks linked to misunderstanding, disengagement or operational inefficiencies.

Through ongoing dialogue, Acolad can strengthen cohesion, foster mutual understanding and promote shared ownership of Company objectives.

3.1.7.1 Policy (S1-1)

Acolad recognises the importance of constructive, transparent and collaborative social dialogue as a central component of its employee engagement and responsible business conduct. It encourages an open working environment that promotes respectful communication and fosters trust between employees, management and staff representatives. Acolad's social dialogue approach is supported by the Human Resources function in coordination with senior management and is embedded in the Group's Code of Conduct and Ethics and Human Rights Policy. These policies establish clear expectations relating to ethics, respectful behaviour and communication at work.

Social dialogue at Acolad includes ongoing exchanges between management and employee representatives, participation in works councils and health & safety committees (where applicable), and regular touchpoints to share relevant updates, listen to employee feedback and jointly support a positive workplace culture. As an active participant of the United Nations Global Compact, Acolad upholds the fundamental right to freedom of association and the right to collective bargaining in all countries where it operates, in line with international standards. The Group respects employees' right to join or not join organisations of their choice, in accordance with local legal frameworks.

Acolad operates primarily in professional services across Europe and other low-risk jurisdictions, with employee representative structures established in countries where mandated by local legislation, such as France. Through these mechanisms, Acolad ensures constructive dialogue, employee representation and consultation on matters relevant to working conditions and organisational developments.

42.61% of Group employees work for entities with employee representative bodies. 100% of employees are represented in France. In addition to employee representative bodies, 31.32% of employees are currently covered by a collective agreement at global level.

3.1.7.2 Actions (S1-4)

Acolad respects the freedom of association and recognises the right to collective bargaining, in line with the third principle of the United Nations Global Compact, to which the Group is an active participant. In all countries where Acolad operates, the Group ensures that employees have access to social dialogue mechanisms appropriate to local legislation and practices.

Employee representative bodies take various forms across the organisation, including staff delegates and works councils (such as the Comité Social et Économique - CSE in France). In countries where formal representation structures are not required by law, Acolad maintains open channels for communication and consultation between employees and management.

Acolad's culture promotes direct access to management and open dialogue, reflecting the Group's core values of collaboration and transparency. To strengthen this engagement, Acolad regularly organises information sessions, workshops, and internal communications initiatives to encourage employees to share feedback and participate in discussions. The effectiveness of these interactions is monitored through employee surveys and HR indicators, ensuring that dialogue remains meaningful, inclusive, and aligned with employee expectations.

EXAMPLES OF INITIATIVES TO ENCOURAGE DISCUSSION WITH EMPLOYEES

Initiatives	Description
Meetings with management	Regular meetings between management and staff representatives, and where applicable, members of the Works Council, to discuss business updates, working conditions, and employee feedback.
Coffee chats with the leadership team	Informal sessions organised to encourage open dialogue between employees and senior leaders, allowing teams to share their perspectives and ideas in a relaxed and collaborative atmosphere.
Focus groups	Small group discussions between employees, HR, and managers to explore specific workplace topics, identify improvement areas, and co-create solutions.
Townhalls	Group-wide meetings that provide updates on company performance, strategy, and upcoming initiatives, with space for Q&A and employee participation.
HR dialogue	Continuous communication between employees and HR representatives to address individual questions, professional development, and workplace well-being topics.
Intranet and internal communication tools	Use of the internal communication platform to share company news, promote engagement initiatives, and provide employees with the option to raise questions or suggestions anonymously.

Employees can also share their opinions and raise concerns through multiple channels, including employee opinion survey, regular coffee chats with senior leaders and thematic discussion groups. In addition, the Whistleblowing Procedure is accessible to all employees and third parties across every country where Acolad operates, enabling the reporting of any suspected misconduct, including issues related to freedom of association. Reports submitted through the Whistleblowing Committee are reviewed with diligence under the joint responsibility of the Legal Director and the Chief People and Culture Officer.

Acolad ensures that employee perspectives and concerns are actively integrated into its decision-making processes. Through regular consultation mechanisms, the Group reinforces a culture where employees' voices contribute directly to shaping initiatives and improvements. This approach supports alignment with employee expectations and encourages a continuous improvement process in which employees are considered essential stakeholders in the evolution of Acolad's practices.

3.1.7.3 Collective bargaining coverage and social dialogue (S1-8)

	Covered by collective bargaining		Social dialogue
Coverage Rate	Employees - EEA countries representing more than 10% of the total workforce	Employees - non-EEA countries on the basis of an estimate for regions accounting for more than 10% of the total workforce	Workplace representation - EEA countries representing more than 10% of the total workforce
0-19%			
20-39%			
40-59%			
60-79%			
80-100%	France, Belgium, Portugal, Spain, Italy		Finland, Germany, Belgium, France, Italy, Sweden

3.1.8 Working Conditions

The material impacts, risks and opportunities related to employee working conditions:

Employee working conditions are a key component of Acolad's ability to deliver high-quality language and content solutions across global markets. As a multilingual and multicultural organisation operating in more than 20 countries, Acolad recognises that maintaining fair wages, ensuring a safe and healthy work environment, and fostering constructive social dialogue are essential to sustaining engagement, performance and long-term organisational resilience. With diverse regulatory environments and labour practices across geographies, Acolad places strong emphasis on harmonising principles while respecting local requirements, ensuring that employees benefit from consistent standards of fairness, well-being and workplace protection.

Managing these responsibilities requires a proactive approach to identifying and addressing risks. Adequate wages, structured dialogue, robust feedback channels and sustained attention to employee well-being are essential to maintaining satisfaction, retention and productivity, which in turn support service quality and business continuity. Acolad maintains clear policies on fair and equitable compensation, professional development and respectful workplace practices, supported by its Diversity, Equity & Inclusion Statement, Code of Conduct and CSR Policy. Social dialogue is encouraged through regular interactions between management and employee representatives and work councils when applicable, ensuring that concerns can be raised and addressed constructively.

Health and safety are equally central to Acolad's responsibilities. Although the Group does not operate high-risk industrial activities, it remains attentive to both physical and psychosocial risks that may arise in office-based, hybrid or remote working environments. Acolad's global health and safety commitments focus on preventing work-related incidents and supporting employee well-being through ergonomic practices, mental-health awareness and flexible work arrangements designed to reduce stress and improve work–life balance. The Group works to anticipate risks linked to remote work, isolation, workload fluctuations and external events that could affect teams across different regions. Processes and training support employees in maintaining safe working conditions, contributing to a healthy and productive work environment.

By prioritising these elements of working conditions, Acolad strengthens trust, enhances employee engagement and supports its ability to attract and retain talent in a competitive international market. A committed approach to fair wages, well-being, social dialogue and health and safety not only reduces operational risks but also creates opportunities to increase productivity, reinforce team cohesion and uphold the company's reputation as a responsible and people-centred employer.

3.1.8.1 Policy (S1-1)

Working conditions, employee engagement and overall well-being are central to Acolad's commitment to its teams globally. Well-being principles are firmly embedded in several foundational documents, including the Code of Conduct and Ethics, the Health and Safety Policy and the Work Environment Policy. These policies outline Acolad's expectations regarding respectful behaviour, safe working conditions and a positive work environment, ensuring that dignity, integrity and fairness guide all interactions within the organisation.

Acolad's Human Resources Department oversees the implementation of these policies across all countries where the Group operates. HR ensures that practices remain aligned with legal requirements, international labour principles and Acolad's core values. This includes a focus on fostering a healthy workplace, supporting mental and physical well-being, ensuring safe working conditions and encouraging equal treatment. These priorities are integrated into Acolad's broader HR strategy, which aims to attract talent, develop skills, engage employees and maintain a collaborative and inclusive organisational culture.

Employee feedback is an essential component of Acolad's approach. The Group regularly collects insights through employee opinion survey, HR interviews, townhalls, team discussions and informal conversations with senior leaders. These mechanisms allow employees to share their experiences, expectations and concerns, and they enable managers and HR teams to design concrete action plans that address local needs. This continuous feedback loop helps strengthen employee experience and ensures that workplace improvements remain meaningful and relevant.

3.1.8.2 Actions (S1-4)

Employee well-being is supported through a combination of global guidelines and local measures adapted to the specific needs of each country. Local HR teams are responsible for monitoring office conditions, supporting employees on work environment topics and addressing health and safety matters. This includes ensuring ergonomically appropriate workstations, improving office layouts to support collaboration, and implementing measures to prevent workplace stress and psychosocial risks.

Fair working conditions (S1-11)

Acolad ensures that all employees benefit from fair and adequate working conditions, including competitive and legally compliant wages in every country where the Group operates. Compensation practices are aligned with local labour regulations and benchmarked against market conditions to ensure fairness and equity.

All Acolad employees are covered by statutory social protection systems that provide income replacement in the event of illness, work-related injury, unemployment after joining the company, parental leave and retirement. Depending on national laws and local practices, business units may also offer additional benefits such as supplementary health coverage, life insurance or enhanced parental leave. These measures reflect Acolad's commitment to supporting employees through major life events and promoting long-term financial and personal security.

The Group's Anti-Discrimination and Anti-Harassment Policy reinforce equal treatment and protects employees against abusive practices, contributing to a work environment where individuals can perform their duties with dignity and respect. Together with the Code of Conduct and Ethics, it ensures that all employees, regardless of gender, origin, disability or personal circumstances benefit from the same protection and ethical standards.

Health, safety and work environment initiatives (S1-14)

Acolad maintains a structured approach to health and safety based on international good practice and compliance with national legislation. The Health and Safety and Work Environment Policies set out the minimum requirements applicable across all locations. These include building and fire safety provisions, adequate ventilation and temperature control, appropriate lighting levels, accessibility considerations and the availability of welfare areas such as kitchen spaces or break zones.

Local HR, Office Management and Health & Safety representatives coordinate to ensure:

- compliance with statutory health and safety requirements;
- the availability of trained first-aiders;
- regular checks on emergency and fire safety equipment;
- workstation and ergonomic assessments;
- measures to reduce physical and psychosocial risks.

Acolad's health and safety management system is based on internal policies and national regulatory requirements and follows recognised management principles such as risk analysis, employee participation and continuous improvement. In 2025, the Group recorded two work-related historic accidents and one work-related illness, resulting in a total of 64 workdays lost. Across the organisation, 3,303,648.4 working hours were recorded. The working-hours figure is based on theoretical hours, as mergers and acquisitions during the year limited full visibility on consolidated data for all entities. The rollout of SuccessFactors across the Group allows more consistent and centralised reporting in future cycles.

All Acolad employees are covered by a legally compliant or recognised health and safety management system. This ensures that minimum health and safety standards are applied consistently and that practices are regularly reviewed for effectiveness.

Employee engagement

Employee engagement remains a priority for the Group. Regular interactions between teams and management, including town halls, HR dialogues, focus groups and leadership coffee chats, give employees the opportunity to express their views on working conditions, organisational changes and workplace culture. These exchanges help ensure that employee perspectives are integrated into decision-making processes and that concerns are addressed in a timely and constructive manner.

Employees also have access to the Whistleblowing Procedure, which provides a confidential channel for reporting misconduct or concerns, including matters related to health, safety or behaviour at work. All reports are reviewed by the Whistleblowing Committee under the responsibility of the Legal Director and the Chief People and Culture Officer, ensuring independent and neutral management of alerts.

Work-life balance metric and target (S1-15)

Work-life balance is a key aspect of Acolad's people-focused approach. All employees are entitled to family-related leave in accordance with national legislation or company agreements, allowing them to balance personal and professional responsibilities. In 2025, 3% of eligible employees made use of family leave, including 8 males and 40 females. This reflects Acolad's commitment to supporting all employees and promoting gender equality in access to family-related benefits. This approach reflects Acolad's commitment to gender equality and promoting an inclusive corporate culture.

Family leave can be taken at Acolad for the following reasons:

- leave for a sick child;
- leave for marriage or marriage of a child;
- leave for birth or adoption;
- parental education leave;
- parental leave;
- family support leave;
- leave upon the death of a close family member.

National legislation defines family leave differently across countries, the types and duration of leave may vary between entities, but all employees are granted access to the appropriate provisions applicable in their location.

TARGETS (S1-5)

Link between metric and IRO	Description of the metric	Scope	**2023 Baseline year performance**	**2025 performance**	Response rate objective
Roll out of an internal survey including various themes (inclusion, engagement, working environment) at different levels of the organization to listen to employees, assess the impact of action plans and develop employee engagement	Deployment of internal employee opinion survey	All employees	58% response rate	96% response rate	2025: 73% 2026: 74% 2030: 75%

3.1.9 Equal treatment and opportunities for all

Managing impacts, risks and opportunities related to equal treatment and opportunities for all:

Employee development is essential for Acolad's ability to adapt to evolving industry trends, particularly in areas such as digital transformation, linguistic technologies and AI-driven solutions. As a knowledge-based organisation operating in a rapidly changing market, Acolad relies on the continuous development of its workforce to maintain operational excellence, meet client expectations and strengthen its competitive positioning.

Acolad actively manages employee engagement, training and career development to support skills growth, foster long-term employability and maintain a stable and motivated workforce. This approach also helps reduce risks related to changing competency requirements, regulatory compliance in training, and potential skill shortages in certain specialised functions.

By investing in learning opportunities, supporting mobility pathways and developing an inclusive workplace environment, this contributes to attracting and retaining qualified talent across its global footprint and reinforces employee confidence in the organisation's long-term direction.

To ensure employees can develop the skills needed for current and future challenges, Acolad implements structured learning initiatives, facilitates internal employee development and fosters a collaborative culture. These efforts reflect the Group's broader strategy to strengthen its human capital, support operational performance and create a positive working environment that enables employees to contribute to the organisation's success.

3.1.9.1 Policy (S1-1)

Acolad aims to provide its employees with opportunities to develop the knowledge and capabilities required to deliver high-quality work, while strengthening their long-term employability in a rapidly evolving job market. Building employee competencies is essential to maintaining service excellence, supporting innovation and ensuring that the Group remains competitive in a technology-driven and knowledge-intensive sector.

The employee training and skills development policy is drafted collaboratively by the Human Resources Department, the CSR team, the Sales Academy, Customer Excellence and the Information Security Team. The policy is validated by the Human Resources & Corporate Social Responsibility function, the Group Chief People & Culture Officer and the CEO. The Human Resources Department oversees its implementation and ensures consistent application and monitoring across all countries where Acolad operates.

The policy sets out the Group's commitments and expectations regarding training access, learning pathways and skill development. It defines the scope of training programs offered at Group and local levels, outlines the responsibilities of managers and employees in the learning process and establish a governance framework for evaluating training effectiveness. Through this structured approach, Acolad seeks to ensure that all employees benefit from equitable access to development opportunities aligned with their roles, career aspirations and the strategic priorities of the organisation.

Training and skills development (S1-13)

Employee training is an integral part of Acolad's HR strategy, reflecting the Group's identity as a knowledge-driven organisation where linguistic expertise, technological capabilities and professional skills underpin service quality. Training contributes both to operational performance and to employees' long-term development, ensuring that individual growth is aligned with the strategic priorities of each business unit.

Acolad employees have access various training programs. Training is primarily coordinated at Group level, while business lines and functional departments develop complementary programs tailored to their operational requirements. Annual training plans are prepared jointly by HR teams and line managers, based on needs identified through regular one-to-one discussions and performance reviews.

Acolad offers a diversified learning ecosystem combining several formats to support continuous development. Employees have access to e-learning modules, in-person workshops, classroom sessions, seminars and virtual learning through webinars. Coaching, mentoring and on-the-job learning further support practical skills acquisition, while participation in external courses, professional certifications and industry events strengthens specialised expertise. This blended approach ensures that employees can build competencies through both structured training and experiential learning.

Since 2024 - 2025, Acolad has reinforced access to training with the Group-wide deployment of SuccessFactors LMS, the central e-learning platform offering modules on languages skills, digital tools, AI-related topics, translation and localisation technologies, mandatory business conduct courses and other job-specific capabilities. LinkedIn Learning licences complement the platform, offering additional opportunities for self-directed learning. Content is regularly enriched through collaboration between HR and operational teams. Dedicated learning teams also design targeted programs, including Sales Academy and Customer Excellence training for client-facing functions.

Through this combination of formal training, digital learning tools and knowledge-sharing practices, Acolad aims to strengthen the expertise of its workforce, provide equitable learning opportunities across countries and support employees in developing their careers within the Group.

TABLE OF COMPULSORY TRAINING COURSES FOR ALL EMPLOYEES

Business Ethics	Information Security	Sustainability
Code of Conduct and Ethics	Information Security	CSR
Anti-Harassement and Anti-discrimination	Join the Human Firewall	Health and Safety
Human Rights	AI Usage Policy	DE&I

Carrer Development and Performance

The performance evaluation process at Acolad takes place every year. It involves a structured discussion between each employee and their direct manager and is designed to:

- assess progress against the objectives set during the previous cycle;
- define performance and development priorities for the coming year;
- review skills development needs, career aspirations and internal mobility opportunities linked to location, function or business requirements.

Acolad applies a unified performance management framework that supports goal-setting and continuous development across all business units. Each employee sets a combination of professional and behavioural objectives, aligned with their role, team priorities and the Group's values. These objectives are reviewed and adjusted annually to ensure clarity, consistency and alignment with strategic expectations.

In addition, the Group is progressively strengthening its feedback culture by promoting regular check-ins between managers and team members throughout the year. This approach supports continuous improvement, encourages open dialogue and reinforces clarity around expectations. Over time, Acolad aims to further integrate recognition, skills development and collaborative efficiency into its performance framework.

3.1.9.2 Actions (S1-4)

Acolad has structured its performance management framework to better support managerial effectiveness, employee engagement and transparent development pathways. The framework emphasises constructive dialogue, continuous feedback and alignment with organisational priorities. Managers are encouraged to foster supportive environments where employees can raise challenges, propose ideas and actively contribute to team objectives.

Training plays a central role in supporting this framework. Acolad employees have access to a wide range of training programs through a diversified learning ecosystem that combines several learning formats.

Since 2024- 2025, Acolad has reinforced access to training through SuccessFactors LMS, the Group's central e-learning platform offering modules on interpersonal skills, digital tools, AI-related topics, translation and localisation technologies, mandatory business conduct courses and job-specific capabilities. LinkedIn eLearning licences complement this platform and provide additional opportunities for self-directed learning. Training content is regularly enriched through collaboration between HR and operational teams. Dedicated learning teams also design targeted programs, including the Sales Academy, which was strengthened in 2024 with a full-time Sales Academy Manager, and Customer Excellence training for client-facing functions.

Acolad has a performance management process applicable to all employees. Each employee follows predefined quantitative and qualitative objectives, and all receive at least one formal performance review every year to support career development. The Group applies a standardised approach built around a unified skills framework, ensuring that talent is evaluated consistently across all countries and business units. This performance review process has been used for all annual evaluations at Acolad since 2023.

Acolad is also enhancing its performance and development processes through the use of its performance review tool integrated into SuccessFactors. This tool enables employees and managers to review skills development needs, discuss career aspirations and assess internal mobility opportunities in alignment with organisational requirements. Over time, Acolad aims to foster a stronger culture of feedback, recognition and continuous development, ensuring that employees are supported at every stage of their professional journey.

3.1.9.3 Training and skills development metrics and targets (S1-13)

Acolad places strong importance on the professional development of its employees. All employees are invited to take part in an annual performance review, which enables them to assess achievements, objectives and development priorities for the year ahead. This process supports a culture of continuous feedback and ensures that training and development needs are identified in alignment with each employee's role, aspirations and the Group's organisational requirements.

Acolad provides employees with access to a wide range of training programs designed to strengthen skills, reinforce expertise and support career development within the Group. Through its commitment to continuous learning, Acolad offers training in interpersonal skills, digital tools, translation and localisation technologies, AI-related competencies and a broad range of job-specific skills. Training content reflects Acolad's dedication to offering fair and accessible learning opportunities to all staff, while respecting diversity, equal opportunity and organisational priorities.

The metric relating to the number of hours of training per employee is calculated based on data available through local HR systems.

Employees on long-term leave and those with less than three months of service are excluded from the calculation to reflect active participation in training cycles. Metrics also include only employees with permanent or long-term contracts. As of the 2025 reporting year, Acolad delivered an average of 3h57 of training per employees and 282 training modules available for all employees. Training averages by gender show 3h06 for male employees and 4h08 for female employees.

Training is delivered through a diversified learning ecosystem. Employees have access to the SuccessFactors LMS, the Group's central e-learning platform, which includes modules on interpersonal competencies, digital literacy, business conduct, translation and localisation technologies, AI-related knowledge and other job-specific capabilities. LinkedIn Learning licences provide complementary opportunities for self-directed learning. Employees also benefit from in-person workshops, classroom sessions, seminars, virtual learning through webinars, and practical development through coaching, mentoring and on-the-job learning. External courses, industry certifications and participation in professional events further support the development of specialised expertise. Dedicated learning teams design targeted programs, including the Sales Academy and Customer Excellence programs, which contribute to strengthening technical and commercial skills across the Group.

Link between metric and IRO	Description of the metric	Scope	2025 performance	Objective
The performance review is an opportunity for the employee and manager to discuss the year's performance and the career interview. A mid-year review is also offered	Employees who took part in the performance evaluation campaign	All Group employees	96%	At least 90% completion rate in 2030
Training is a key element to position employees at the heart of a learning culture where skills are valued. This has an impact on the Company's sustainable performance	Number of hours of training per employee	All Group employees	3.57 hours of training on average per employee	10 hours of training per employee per year by 2026

3.1.10 Talent attraction & retention

Acolad's ability to attract, retain and engage talent is central to sustaining the Group's long-term performance. As a people-driven organisation, Acolad recognises that its success relies on the expertise, commitment and development of its employees. The Group therefore strives to create a workplace environment where individuals can thrive, grow and feel valued. This approach begins with providing clear career paths, supporting continuous learning and ensuring fair and transparent management practices across all business units.

Employee engagement is continuously strengthened through regular interactions between teams and management. Town halls, team meetings, HR dialogues, focus groups and informal leadership exchanges provide dedicated spaces for employees to share feedback, discuss their working environment and express expectations regarding their professional development. These interactions foster a culture of openness and mutual trust, helping to reinforce employees' connection to the company and strengthen organisational cohesion across countries.

Acolad also promotes internal mobility by ensuring that employees have visibility over opportunities available within the Group. Managers are encouraged to support their teams' career aspirations by fostering the development of new skills, encouraging cross-functional experiences and facilitating internal moves whenever possible. This approach contributes to strengthening long-term career perspectives and retaining high-potential employees.

To support talent attraction and retention, Acolad invests in employees' wellbeing, offering flexible work arrangements, health and safety measures and wellbeing initiatives adapted to local contexts. The working environment is designed to enable a healthy balance between professional and personal responsibilities, reinforcing employees' motivation and sense of belonging. Through these combined efforts, Acolad positions itself as an employer committed to professional fulfilment, continuous growth and a positive working culture for all its teams worldwide.

3.1.10.1 Policy (S1-1)

Acolad's objective is to attract and develop talent with the skills required to support the Group's growth and evolving strategic priorities. The employee training and skills development policy, which also encompasses the attraction, engagement and retention of talent, is currently being drafted collaboratively by the Human Resources Department, the CSR team, the Sales Academy, Customer Excellence and the Information Security Team. The policy will be validated by the Human Resources & Corporate Social Responsibility function, the Group Chief People & Culture Officer and the CEO. Once approved, the Human Resources Department will oversee its implementation and ensure consistent application and monitoring across all countries where Acolad operates.

The policy has few objectives:

- The policy reinforces Acolad's commitment to continuous development, offering access to diversified training programs through in-person learning, e-learning, on-the-job training, coaching and external certifications;
- Providing employees with opportunities to grow within the organisation, explore new roles and develop skills aligned with business needs, supported by structured career pathways and mobility options;
- Ensuring that new hires integrate successfully, feel supported in their roles and remain engaged throughout their career journey at Acolad;
- Enhancing Acolad's visibility and attractiveness both locally and globally to position the Group as an employer of choice in the content and language services sector.

3.1.10.2 Actions (S1-4)

Leveraging the Acolad brand

Acolad is enhancing its brand to strengthen its position as an attractive employer in the global content and language solutions industry. In 2025, efforts included the refreshed One Acolad marketing rebranding initiative, increased visibility on social media and platforms and the launch of “Your Voice. Our Journey.” & “Life @ Acolad” on the corporate website and LinkedIn. This initiative showcases life at Acolad through the experiences and stories of employees across different countries and functions. These actions support early-career recruitment as well as the attraction of specialised talent in technology, localisation, AI and customer-facing roles. Acolad is progressively building a consistent communication strategy that highlights its multicultural environment, career development pathways and commitment to ethical and responsible business practices.

Enhance talent attraction

Acolad continues to develop a more structured and consistent approach to recruitment across its business units and countries. The Group is working to harmonise recruitment guidelines, improve job descriptions and reinforce sourcing capabilities through enhanced digital tools and dedicated training for hiring teams. Internal recruitment teams and external agencies collaborate closely to ensure efficient hiring processes and the onboarding of candidates whose expertise matches the Group’s evolving business needs. Functional teams, including HR and the business lines, actively contribute to defining the skills, competencies and profiles required to support Acolad’s strategic priorities.

Improve candidate experience

Providing a positive and transparent recruitment experience remains central to Acolad’s engagement efforts. The Group is working to ensure that all candidates receive timely communication, clear expectations and constructive feedback throughout the hiring journey. Job postings are being progressively updated to reflect Acolad’s culture, values and DE&I principles. Acolad also aims to simplify and digitalise recruitment steps wherever possible, offering a more seamless candidate experience from application to onboarding.

Career development and mobility

To strengthen internal mobility, Acolad promotes career progression pathways and encourages employees to explore new opportunities across teams, roles and geographies. The annual performance review process supports discussions on development needs, career aspirations and mobility possibilities. Employees also benefit from a diversified learning ecosystem that includes in-person workshops, e-learning modules, webinars, coaching, mentoring and on-the-job learning opportunities. SuccessFactors LMS, together with LinkedIn Learning licences, expands access to training in interpersonal skills, technologies, AI-related topics and role-specific competencies. Dedicated programs, such as the Sales Academy and Customer Excellence training, provide more targeted development pathways to support mobility into commercial or client-facing roles.

Acolad is also expanding cross-functional collaboration and knowledge-sharing, enabling employees to develop broader competencies and prepare for future leadership or expert positions. Through these initiatives, Acolad aims to create a dynamic workplace where talent can grow, evolve and contribute to the Group’s long-term success.

3.1.10.3 Metric and target

Acolad has set clear, quantitative targets to strengthen talent attraction and retention across the Group. These targets form part of the wider HR and sustainability roadmap and support the objective of sustaining a stable, skilled and engaged workforce in a competitive global market.

The Group has defined a trajectory to monitor and improve voluntary turnover, with annual objectives validated by HR leadership and shareholders. The target for 2025 was to achieve a voluntary departure rate at or below 11.7%, based on a 2023 baseline of 12.4%. Acolad reached 10.01% in 2025, confirming progress toward the medium-term trajectory that aims to reach 10.5% by 2026 and 10.2% by 2028. Performance is assessed annually through HR headcount data and departure tracking, using a consistent methodology applied across all entities.

Training coverage is also monitored as a key enabler of talent engagement and retention. In 2025, 53% of employees took part in at least one training session beyond mandatory requirements. Acolad has set an internal ambition for at least 80% annual non-mandatory training coverage by 2030. Performance is assessed through SuccessFactors completion data.

Acolad also monitors key indicators that support talent attraction and branding, including employee satisfaction, turnover ratios and recruitment performance. The Group conducts an annual employee opinion survey to assess engagement levels and guide improvement actions at team and Group level.

Voluntary turnover rate	2023	2024	2025	2026	2027	2028
Objectives	-	11.7%	11.2%	10.5%	10.3%	10.2%
Results	12.4%	10.01%	9.89%	-	-	-

3.1.12 Diversity, equity & inclusion

The material impacts, risks and opportunities related to diversity, inclusion and equity:

Diversity is at the core of Acolad's identity and a key asset in delivering high-quality content and language solutions to global clients. With teams operating in multiple countries and representing a wide range of nationalities, cultures and linguistic backgrounds, inclusion forms an essential foundation for collaboration and service excellence. Employees are recognised for their competencies and contributions, supported by an environment that promotes equal access to opportunities and individual development. Given that Acolad's sector naturally attracts a high proportion of women and individuals from various nationalities and cultural backgrounds, promoting gender and cultural diversity as well as equal treatment are key priorities across the organisation.

As a multilingual and multicultural Group, Acolad is committed to ensuring that all employees receive fair treatment and equal access to growth opportunities, regardless of their location, gender or background. Operating across countries with different labour regulations and cultural expectations requires the Group to maintain consistent, equitable practices and ensure alignment with local conditions. This focus supports talent attraction in competitive labour markets and reinforces employee engagement by creating a workplace where everyone can thrive.

Acolad's diverse workforce, composed of a broad range of nationalities, language skills and professional profiles, contributes to creativity, agility and more informed decision-making. This multicultural environment helps teams better understand client needs, adapt to varied markets and provide high-quality solutions tailored to global audiences. By continuing to strengthen diversity, inclusion and equity within its teams, Acolad enhances its attractiveness as an employer and reinforces its long-term competitiveness in the content and language solutions industry.

3.1.12.1 Policy (S1-1)

Acolad recognises the diversity of its workforce as a core asset that strengthens the Group's ability to serve global clients and operate across multiple markets. The Group is committed to ensuring that all employees have equal access to opportunities for growth, development and engagement. This commitment is embedded in Acolad's CSR Policy, Code of Conduct and Ethics and DEI Statement, which provide a common framework promoting fairness, inclusion and respect across all entities.

Acolad's commitments on diversity, equity and inclusion are implemented at Group level and integrated into key processes such as recruitment, training, leadership development and talent management. These commitments are supported by Group governance, with CSR and HR teams working in coordination with executive leadership. The Group regularly raises awareness on DEI topics and promotes learning opportunities tailored to the needs of a multicultural and multilingual organisation.

Acolad also celebrates the richness of its international workforce by encouraging local and Group-wide initiatives that promote inclusion and cross-cultural understanding. These initiatives help nurture a workplace where diverse experiences, perspectives and skills contribute to a collaborative and innovative organisational culture.

Two elements support Acolad's commitment to diversity, inclusion and equity:

- Acolad's Code of Conduct and Ethics, signed by employees, reaffirms the Group's commitment to equal opportunity and to prohibiting any form of discrimination related to gender, age, disability, nationality, family situation, sexual orientation, political or religious affiliation or union membership. The Code sets clear expectations regarding respectful behaviour, prevention of harassment and fair employment practices. It was jointly developed by the HR, CSR and Legal Departments and is available to all employees through internal platforms. A monitoring process ensures appropriate adherence and understanding across the Group.
- Acolad's CSR Policy reinforces this commitment by embedding diversity, equal treatment and human rights into the Group's social and ethical responsibilities. The policy emphasises fair working conditions, cultural diversity, equitable access to training and career development. It also establishes requirements for responsible behaviour across the value chain, ensuring that suppliers and partners uphold similar standards.

3.1.12.2 Actions (S1-4)

Acolad continues to strengthen its commitment to diversity, inclusion and equity, recognising these principles as essential to the Group's long-term success. With operations across 22 countries and a workforce representing over 60 nationalities, Acolad actively works to create an environment where each person is treated with fairness and empowered to grow. Women make up 63% of the Group's global workforce, reflecting the natural composition of the content and language sector, and Acolad places particular importance on ensuring equal opportunities at all stages of the employee journey. Efforts since 2023 have focused on embedding inclusion within recruitment, onboarding, talent development, leadership, and external engagement.

Governance

Acolad has reinforced its governance framework to ensure that diversity and gender equity principles are embedded in decision-making at the highest level. The Group's Diversity, Equity & Inclusion Statement, Code of Conduct and Ethics, Anti-discrimination and Anti-harassment Policy and CSR Policy guide HR practices, leadership expectations and operational processes across all countries. Key actions include:

- Aligning recruitment, promotion and performance processes with DEI principles;
- Integrating inclusion expectations into leadership roles and HR governance;

- Monitoring progress via gender representation, promotion rates and pay equity indicators;
- Ensuring structured communication of Group values during onboarding and throughout the employee lifecycle.

Candidate Experience

Acolad is progressively harmonising its recruitment approach to ensure that job descriptions, sourcing practices and evaluation methods reflect inclusive standards across all countries. Recruitment partners are expected to adhere to Acolad's commitments in fairness, non-discrimination and equal opportunities. Initiatives delivered since 2023 include:

- Redesign of job descriptions to eliminate bias and emphasise skills and competencies;
- Reinforcement of equitable hiring through competency-based assessments;
- Training and guidance for hiring managers to support fair interviewing practices;
- Stronger alignment with external agencies to ensure inclusive candidate handling.

Onboarding

The onboarding process also plays a key role in reinforcing Acolad's inclusive culture. New employees are introduced to the Group's values and business conduct, Code of Conduct and Ethics, and expectations related to equitable behaviour in international teams. Enhancements include:

- Integration of DEI principles into onboarding journeys across all entities;
- Mandatory Code of Conduct and Ethics training covering respect, integrity and equal treatment.

Career development

Acolad places particular emphasis on ensuring equal access to development opportunities. The Group's approach combines structured talent management tools with development pathways that support women at all levels of the organisation.

In 2025, the representation of women in leadership is 38% of the Executive Committee and 63% of management positions held by women. This reflects Acolad's long-term focus on internal mobility, leadership development and succession planning, rather than short-term quotas. Key development initiatives:

- Leadership, mentoring and coaching programs designed to support women's advancement;
- Increased access to cross-functional opportunities and mobility pathways;
- Regular monitoring of promotion rates and equitable distribution of development opportunities;
- A culture that encourages internal progression, supported by structured skills and career development and performance reviews in SuccessFactors.

Pay Equity

Acolad's progress is supported by structured measurement and reporting. For example, Acolad France's 2025 Gender Equality Index score of 76/100 reflects its commitment to transparency, equal pay and fair career progression. Monitoring mechanisms include:

- Annual review of gender representation at all levels;
- Tracking of promotion and salary benchmarks;
- Regular assessment of mobility and training opportunities;
- Identification of disparities and targeted corrective actions.

This enables Acolad to maintain momentum while addressing regional differences, operational complexity and varied legal environments across its 22-country footprint.

External Engagement

Acolad extends its commitment to diversity and inclusion beyond its own workforce through active engagement in sector-wide initiatives. The Group had been a sponsor of Women in Localization, supporting a global community of more than 13,000 members across 30 chapters. This partnership reflects Acolad's ambition to promote women's visibility and leadership in the localisation industry. Since 2023, 61% of Acolad's event speakers have been women, sharing expertise in areas such as AI, technology and business leadership.

In 2025, Acolad strengthened its social impact strategy by becoming a Platinum Sponsor of Translators without Borders. Through this partnership, the Group contributes to humanitarian efforts that ensure language is never a barrier to essential information, particularly in healthcare, crisis response and refugee support. TWB's global network of volunteer translators aligns closely with Acolad's mission to improve multilingual accessibility.

Acolad's engagement also includes sustained investment in training public interpreters and translators, immigrants, refugees, and asylum seekers through the Acolad Academy, supporting public services and community organisations by equipping professionals with essential linguistic skills.

Inclusive and Resilient Organisation

Acolad's multilingual and multicultural workforce contributes to creativity, agility and deeper insight into client needs. By strengthening diversity and equitable practices, the Group boosts talent attraction in competitive labour markets, enhances employee engagement and strengthens its ability to operate effectively across global client segments.

Through consistent action, Acolad continues to foster a workplace where women are visible, empowered and able to progress to the highest levels of leadership. These efforts demonstrate a clear commitment to long-term organisational resilience and responsible, inclusive growth.

3.1.12.3 Metrics and targets (S1-9, S1-12, S1-16)

Age diversity (S1-9)

Acolad recognizes the value of intergenerational diversity and is committed to promoting an inclusive working environment for all.

The workforce is made up of employees from different age groups, reflecting a wealth of experience, perspectives and skills.

Workforce by age group	Number of employees			%
Under 30	205			13.71
Age 31 to 50	907			60.67
Over 51	373			24.95
Not reported	10			0.67
Gender diversity (S1-9)				
Worldwide, 63% of the Group's employees are women				
Gender balance by employment category	Number of women	% women	Number of men	% men
Top management level	3	37.5	5	62.5
Senior Leaders	17	73.9	6	26.1
People Managers	43	63.2	25	36.8
Not reported	0	0.0	0	0.0
TOTAL	**941**	**63**	**554**	**37**

This executive management corresponds to the CSRD definition of top management.

By the end of 2025, 38% of the executive management were women, 66% of the management leaders were women.

Persons with disabilities (S1-12)

In 2025, Acolad had 16 people with declared disabilities in its workforce. This represents 0.10% of employees. However, this number may be underestimated because it depends on local legislation and whether the employee wishes to declare their disability.

Gender pay gap and total remuneration ratio (S1–16)

At Acolad, diversity and inclusion are embedded in our identity as a multilingual and multicultural organisation. With over 60 nationalities represented across more than 20 countries, our workforce reflects the global communities we serve. We are committed to ensuring that all employees receive fair treatment, equal access to opportunities and a work environment in which everyone can develop their full potential, regardless of gender, origin, age, language or background.

We operate in multiple, diverse markets, where local labour regulations, market conditions and reporting obligations vary significantly. Pay is therefore influenced by several factors, including job complexity, skills, expertise, performance, geographic location and local market dynamics. Acolad is committed to equal pay for similar work, meaning that any differences in compensation must be explainable by objective, job-related criteria aligned with our remuneration practices.

Acolad's Diversity, Equity and Inclusion Statement establish clear principles regarding gender equality, non-discrimination, transparent hiring and unbiased development. These principles guide our compensation practices across the Group and support our long-term ambition to strengthen pay equity as we continue to formalise our global People & Culture processes.

In 2025, the Group's unadjusted gender pay gap stood at 7.09%, down from 8.79% in 2024, representing a decrease of 19.4% year-over-year. This improvement reflects targeted pay equity measures implemented across the organization, which have contributed to strengthening fair and balanced compensation practices for all employees.

3.1.13 Other work-related topics (S1-3)

Privacy

Data privacy and cybersecurity are key priorities for Acolad, given the nature of its business and its role in managing sensitive information entrusted to the Group by employees, clients and end users. Protecting personal data is essential to maintaining trust, ensuring business continuity and complying with applicable regulations in all countries where the Group operates.

Acolad is committed to safeguarding the privacy and security of employees' personal data, in line with strict internal policies and legal requirements. These obligations form a core element of the Group's ethical and compliance framework. The detailed characteristics of Acolad's personal data protection commitments, governance and processes are presented in section 3.3.3 on Data privacy and cybersecurity.

3.2 Workers in the value chain (ESRS S2)

As outlined in the value chain overview (section 1.3.1), ESRS S2 considers value chain workers to include all individuals contributing to Acolad's upstream and downstream supply chain.

At this stage, Acolad's actions and policies primarily focus on Tier-one suppliers, who are directly managed by the Group's procurement and operational departments.

3.2.1 Strategy

3.2.1.1 Interests and views of stakeholders (ESRS 2 SBM-2)

Under the CSRD and the ESRS, companies must demonstrate how they engage with different social groups across their value chain. For Acolad, whose activities are centred on intellectual and professional services, the most relevant interactions identified through the double materiality assessment relate primarily to Tier-one suppliers. These partners play a direct role in supporting Acolad's operations and therefore represent the core focus of the Group's value-chain social due diligence.

For value chain workers, the key interests identified concern respect for human rights, decent working conditions and responsible business conduct. To address these expectations, Acolad relies on recognized assessment frameworks, including the EcoVadis platform, which evaluates suppliers on criteria such as labour practices, employee rights and social compliance.

Acolad also integrates sectoral and geographical analyses into its supplier review process. These insights help benchmark practices across the countries and industries in which our partners operate, strengthening the Group's ability to identify potential risks, adjust its sourcing approach and reinforce its CSR commitments.

For Acolad, value chain workers in the upstream supply chain primarily include the employees of the Group's Tier-one suppliers, such as:

- providers of IT equipment, software and cloud services
- freelance linguists and language service vendors
- facility management and office service providers
- professional services and consultants.

These workers contribute directly to Acolad's operations and service delivery, forming the main population covered by the Group's supplier due diligence and responsible procurement efforts.

3.2.1.2 Material impacts, risks and opportunities and their interaction with strategy and business model (ESRS 2 SBM-3)

Acolad's main suppliers are primarily freelance linguists and interpreters, technology and software partners, cloud providers, professional services and consultants, as well as office and facility service providers supporting the Group's global operations.

3.2.2 Management of impacts, risks and opportunities and metrics

The material impacts, risks and opportunities associated with the sustainable and responsible practices in the supply chain:

Acolad is committed to integrating the impacts relating to the working conditions of workers in its value chain into the development of its strategy. These considerations help strengthen the Group's operating model, ensure alignment with stakeholder expectations and support compliance with evolving regulatory requirements. As a global provider of content and language services, Acolad relies on an extensive network of suppliers, freelance linguists, technology partners and service providers, making responsible working conditions a core element of its broader sustainability commitments.

Ensuring fair, safe and respectful working conditions across this ecosystem is central to Acolad's Human Rights Policy, which is aligned with internationally recognised standards such as the UN Guiding Principles on Business and Human Rights and the ILO Core Labour Standards. The Group promotes strict respect for human rights, decent working conditions and equal treatment, and seeks to prevent risks such as discrimination, excessive workloads, unsafe working environments, harassment, forced labour and child labour. This preventive approach contributes to safeguarding the dignity and well-being of all workers involved in the delivery of Acolad's services.

Acolad's value chain spans diverse geographies and labour markets, the nature and severity of risks may vary across sectors and regions. The Group therefore monitors sectoral and regional risk indicators to identify where workers may be more exposed, including freelance workers, temporary staff, facility service providers or suppliers operating in higher-risk jurisdictions. This analysis supports more targeted due diligence and helps strengthen responsible business practices throughout the value chain.

Four main purchasing categories have been identified, each involving specific impacts.

Main purchasing categories	Impacts
Language service vendors and freelance linguists	Working conditions, work-life balance, fair remuneration practices, payment terms, unstable workload and deadlines, market shift, training and upskilling, equal treatment.
IT equipment and software providers	Working conditions, conflict minerals risks, production pollution, health and safety practices.
Cloud service providers	Data privacy, cybersecurity, reduction in energy consumption.
Temporary employment and staffing agencies	Living wage, working hours, fair treatment of temporary staff.
Facility management, cleaning and office services suppliers	Working conditions, occupational health and safety, fair pay, exposure to chemical products and environmental risks.
Training, consulting and professional service providers	Working hours, respect for labour rights, transparency and ethical business conduct.

3.2.2.1 Policies (S2-1)

Acolad has been striving for several years to develop balanced relationships with its suppliers. This approach is reflected in a comprehensive set of policies and contractual requirements to ensure responsible, ethical and fair working conditions across its value chain. This framework is articulated through the Group's Human Rights Policy, CSR Policy, Purchasing Policy, Vendor Management Policy and the General Terms and Conditions for Suppliers and Vendors. These documents translate Acolad's commitments into binding operational requirements and guide the behaviour of all external partners involved in the delivery of its services.

The Human Rights Policy sets out the Group's overarching commitments and aligns Acolad with the highest international standards, including the UN Guiding Principles on Business and Human Rights, the ILO Core Labour Standards and the Ten Principles of the UN Global Compact. It establishes clear expectations regarding the prohibition of forced or compulsory labour, child labour, human trafficking and discrimination. The policy also emphasises the right to fair and equitable working conditions, occupational health and safety, freedom of association and the protection of personal dignity. These principles apply across the entire value chain and form the basis for Acolad's approach to respect for human rights.

Acolad operationalises these commitments primarily through its General Terms and Conditions for Suppliers and its General Terms and Conditions for Linguist Vendors, which formalise the ethical, legal and social obligations required of all suppliers, subcontractors and freelance linguists. The GTCs incorporate Acolad's Human Rights Policy by reference and include binding clauses on compliance with applicable labour legislation, ethical conduct, anti-corruption, confidentiality and data protection. They explicitly prohibit forced labour, child labour and trafficking, require respect for non-discrimination and equal treatment, and mandate safe and healthy working conditions. These contractual obligations ensure that all partners uphold Acolad's standards throughout the relationship.

The Purchasing Policy reinforces these commitments by embedding sustainable and responsible procurement criteria into purchasing practices. It sets clear principles for supplier selection, evaluation and qualification, and requires due diligence assessments related to social, environmental, ethical and compliance risks. By promoting transparency, fair competition and accountability, the policy ensures that procurement decisions actively contribute to the Group's CSR commitments and that suppliers are assessed not only on price or expertise but also on their alignment with Acolad's values.

For freelance linguists and other language professionals, the Vendor Management Policy provides a structured approach for managing vendor relationships. It outlines requirements for recruitment, testing, onboarding and performance evaluation, ensuring that vendors are selected through objective processes and evaluated using harmonised quality criteria. The policy emphasises transparent communication, fair treatment, responsible collaboration and adherence to ethical and professional standards. It also sets out processes for corrective actions when non-compliance or quality issues arise, thereby contributing to continuous improvement and responsible sourcing.

Acolad's policy framework also integrates broader commitments related to equality, diversity and inclusion through the Group's DE&I Statement, which reinforces non-discrimination, equal opportunity and fair treatment across all professional interactions, including those involving value chain workers. The CSR Policy further emphasises responsible conduct, promoting transparency, environmental stewardship and respect for stakeholders' rights throughout the value chain.

These commitments reflect the Group's firm determination to promote a respectful and responsible value chain, in line with the highest international standards such as:

- UN Sustainable Development Goals;
- the principles of the United Nations Global Compact;
- the rights defined by the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work: anti-discrimination (conventions 100 and 111), fight against child labor (conventions 138 and 182), hours of work (conventions 1 and 30), salary and employee benefits (conventions 26 and 131), freedom of association and the right to collective bargaining (conventions 81, 98 and 135), occupational safety and health (convention 155), violence and harassment (convention 190);
- French Sapin II Law.

To ensure compliance, Acolad reserves the right to conduct monitoring activities, audits and corrective action procedures, and to end business relationships where partners fail to meet the Group's ethical, legal or human rights standards. This approach guarantees the protection of workers in the value chain and contributes to maintaining responsible and sustainable business practices across all categories of suppliers and vendors. If these commitments were not to be respected, Acolad has implemented monitoring mechanisms and appropriate sanctions to ensure compliance and protect workers' rights. (S2-3)

Governance

To strengthen and harmonise responsible value chain practices across the Group, Acolad has established a structured governance framework that ensures the consistent application of its human rights, compliance and sustainable procurement commitments. Value chain workers topic is shared across several corporate

functions, each contributing to the monitoring, implementation and continuous improvement of Acolad's due diligence processes concerning workers in the value chain.

Acolad has established the CSR and Risk Committees, which includes senior representatives from key Group functions such as Procurement, HR, Risk & Compliance, Legal, Information Security, Tech, and Finance. The committees meet on a regular basis to review progress on responsible sourcing, human rights due diligence, and supplier compliance. It ensures that Group policies are applied consistently across entities and that corrective actions are implemented where needed.

The Risk & Compliance Team oversees the implementation of the Human Rights Policy, monitors adherence to the Code of Conduct and Ethics. The team also performs risk mapping and due diligence on suppliers, with a particular focus on identifying higher-risk categories and regions. They monitor the implementation of its value chain requirements through supplier certifications and qualifications reviews, ongoing due diligence and targeted assessments led by the Risk & Compliance teams.

The Resource Management Team coordinates engagement with freelance linguists, who represent a significant portion of Acolad's value chain. The team manages the qualification, onboarding, assignment and continuous performance evaluation of over 10,000 freelance workers. It ensures that working conditions, payment practices, communication channels and training resources reflect Acolad's commitments to fair and respectful treatment.

3.2.2.2 Processes for engaging with value chain workers about impacts (S2-2)

To date, Acolad has not adopted a formal process for directly engaging with workers in its value chain. However, the Group's Code of Conduct and Ethics, Human Rights Policy, and Supplier and Vendor Contract Annex – General Terms and Conditions explicitly require all business partners to uphold fundamental rights of value chain workers, including fair labour practices, non-discrimination, health and safety, and respect for human dignity in line with international standards.

3.2.2.3 Processes to remediate negative impacts and channels for value chain workers to raise concerns (S2-3)

Acolad has established mechanisms to identify, address and remediate potential negative impacts affecting workers in its value chain. These mechanisms apply to all business partners and are anchored in the Group's Code of Conduct and Ethics, Human Rights Policy, Purchasing Policy, Supplier Evaluation Procedure, and the General Terms and Conditions for Suppliers and Vendors. These instruments set clear expectations regarding respect for labour rights, non-discrimination, health and safety, and ethical business conduct across Acolad's global supply chain.

Acolad provides a formal channel for raising concerns through its Whistleblowing Procedure, available to all internal and external stakeholders, including suppliers, contractors and subcontractors. Reports can be submitted confidentially via Acolad's online misconduct form (accessible on the Group website under "Legal Notices"), email to the Whistleblowing Procedure Officer, or through legally recognised external reporting bodies. This system is available to anyone with first-hand knowledge of misconduct, including issues related to human rights, labour conditions, health and safety or discrimination.

All alerts are managed by the Whistleblowing Management Committee, composed of the Legal Director, the Chief People and Culture Officer and additional experts depending on the nature of the alert. The Committee ensures a confidential, impartial and timely review of reports, acknowledges receipt within seven working days and provides feedback to the whistleblower within three months, in line with legal requirements. Where an alert concerns a supplier, the vendor management or procurement functions are involved to gather additional information, engage with the supplier and evaluate appropriate remediation measures.

When a risk or breach is confirmed, Acolad may request the supplier to implement a corrective action plan, reinforce controls or adapt their practices. Depending on the severity of the issue, Acolad may conduct further investigations, seek external support or reconsider the contractual relationship. All actions taken follow Acolad's Human Rights Policy and Supplier Terms, ensuring proportionality, transparency and respect for due process.

These measures ensure that value chain workers have safe, confidential and accessible channels to report concerns, while enabling Acolad to identify and remediate negative impacts in a structured manner consistent with international standards.

3.2.2.4 Actions (S2-4)

Given the nature of Acolad's sector, which provides intellectual and digital services rather than manufacturing or heavy industrial activities, the overall risk exposure for value chain workers is comparatively low. Nevertheless, Acolad remains vigilant in identifying and managing potential social and human rights risks within its supplier ecosystem.

The Risk & Compliance team has formalised a Supplier Evaluation Framework, supported by the supplier certification questionnaire and the qualification questionnaire. These tools integrate ESG risk indicators such as labour practices, non-discrimination, freedom of association, health and safety, and data protection. Based on the results, Acolad identifies suppliers presenting higher exposure due to their activity, geography or labour practices and establishes targeted follow-up through corrective action plans or enhanced monitoring where necessary.

Acolad's actions prioritise tier-one suppliers, who are directly engaged through contractual agreements governed by the Group's General Terms and Conditions for Suppliers and the Human Rights Policy. These binding documents set out requirements relating to ethical conduct, human rights, labour conditions and the prevention of forced and child labour and apply across all regions where the Group operates.

The Group plans to continue strengthening its responsible procurement practices by expanding supplier due diligence coverage, harmonising procurement processes across countries and enhancing reporting capabilities to improve visibility on social risks within its value chain.

3.2.2.5 Metrics and targets (S2-5)

To monitor the implementation of its measures relating to value chain workers, Acolad has established internal monitoring based on the following indicators:

- % of suppliers assessed through Acolad's Supplier Evaluation Framework, including the supplier certification questionnaire and qualification questionnaire;
- % of suppliers and vendors who have formally accepted and signed Acolad's Code of Conduct and Ethics, either through contract signature or acceptance of the General Terms and Conditions for Suppliers;
- Number of reports submitted through the Whistleblowing Procedure by value chain workers, suppliers, or external stakeholders, including the nature of alerts and follow-up actions.
- These indicators are defined jointly by the Risk & Compliance, Procurement, Legal and CSR functions. Targets associated with these indicators are monitored internally to assess the effectiveness of Acolad's policies, due diligence processes, and supplier engagement approach.

3.3 Consumers and end-users (ESRS S4)

Acolad's business model is centred on delivering high-quality content and language solutions designed to meet the needs of its diverse client base. The Group serves corporate customers, public sectors and global organisations that rely on Acolad for translation, localisation, interpretation, content creation, digital solutions and technology-enabled linguistic services. These services support millions of end-users who access products, platforms or information that Acolad helps make understandable, accessible and culturally relevant.

3.3.1 Strategy

3.3.1.1 Interests and views of stakeholders (ESRS 2 SBM-2)

How the interests, views and rights of consumers and end-users are taken into account is described in section 1.3.2 "General disclosures (ESRS 2)" of this report.

Since its creation, Acolad has worked with corporate clients and public sectors to understand and better anticipate their needs. Acolad is therefore committed to listening to its clients and users, and to constantly improving the service it offers. Acolad incorporates the interests, needs and rights of consumers and end-users into its service delivery through structured feedback mechanisms, collaboration with client organisations and continuous improvement processes.

Acolad has maintained regular dialogue with its clients and, indirectly, with end-users who rely on its services. Acolad teams work closely with corporate clients, public bodies and NGOs to understand evolving expectations and ensure that services remain relevant, accessible and aligned with high communication standards.

Acolad places particular attention on user experience, accessibility and respect for human rights. Several of its projects serve vulnerable or minor groups such as migrants, refugees, asylum seekers, victims, persons with disabilities and individuals who need healthcare or legal information. For these groups, Acolad collaborates with public institutions and humanitarian partners who act as trusted intermediaries for collecting feedback and ensuring that the needs of these audiences are properly taken into account.

Insights are collected through annual Net Promoter Score (NPS) surveys, project-based evaluations conducted by the Quality Assurance and Customer Excellence teams and regular meetings with key clients. These mechanisms provide information on accessibility, cultural sensitivity, linguistic adequacy and overall user experience. The results guide the continuous improvement of services and strengthen the quality and relevance of Acolad's offerings.

Acolad's engagement approach is based on transparency, respect and inclusivity. Feedback from clients and end-users are integrated into decisions related to service design, process optimisation, accessibility requirements and content quality. By ensuring that user expectations remain central to its operational model, Acolad supports client satisfaction, long-term service relevance and equitable access to information for the communities it serves.

True to Acolad's mission to "empower understanding across languages and cultures", the Group's services enhance end-users' access to accurate, inclusive and reliable information. By improving linguistic accessibility, Acolad helps companies strengthen their global presence, ensure regulatory and technical accuracy, and deliver seamless user experiences across markets. Ultimately, Acolad contributes to more inclusive communication, supports the digital and economic performance of its clients, and fosters broader social participation for end-users worldwide.

3.3.1.2 Material impacts, risks and opportunities and their interaction with strategy and business model (ESRS 2 SBM-3)

Consumers and end-users play a central role in Acolad's activities. Understanding the risks and opportunities that affect them is essential to the Group's business model. These groups are closely linked to Acolad's strategy, which is built around delivering high quality, secure, and culturally accurate language and content solutions for a wide range of corporate, institutional, and public-

sector clients.

As part of its strategic roadmap, Acolad continues to strengthen its commitment to innovation, digital transformation and responsible AI to enhance accessibility, accuracy, and user experience. These developments support clients in meeting growing expectations for ethical communication, data protection, and inclusive access to information.

Acolad is actively committed to listening to the needs of consumers and end-users. Insights gathered through client feedback, NPS surveys, project reviews which allows the Group to adapt its offerings to evolving expectations in terms of clarity, cultural relevance, accessibility, and service reliability. This is particularly important in sectors where end-users may be vulnerable, including migrants, refugees, patients, and individuals relying on essential public services.

Regarding risks and opportunities, Acolad has identified potential risks related to data privacy, information security, and the misuse or inaccuracy of AI-assisted content. These risks could affect the trust and safety of end-users, particularly in regulated or sensitive contexts. At the same time, these challenges create opportunities for innovation, such as the development of enhanced security features, responsible AI practices, and improved quality assurance processes to strengthen user confidence.

Acolad ensures that its services remain reliable, secure, and responsive to the needs of the companies, institutions, and communities that depend on its communication solutions.

3.3.2 Impact, risk and opportunity management

3.3.2.1 Processes for engaging with consumers and end-users about impacts (S4-2)

Acolad applies a structured, proactive approach to capture the voice of customers and end-users and to continuously improve its services and data protection.

Client and end-user feedback mechanisms

Acolad gathers structured feedback throughout the service lifecycle. Annual Net Promoter Score (NPS) surveys capture overall satisfaction and loyalty, while project-specific evaluations led by the Quality Assurance and Customer Excellence teams assess service accuracy, delivery, and responsiveness. Clients can provide input at multiple stages: after project completion, through digital forms, or during account reviews and regular project meetings. All feedback is analysed to identify areas for improvement and to develop appropriate action plans.

Consumers and customers can share views and suggestions:

- Once a year through a relational Net Promoter Score (NPS) survey coordinated by Marketing
- Success Rate monitoring: Acolad measures the percentage of orders for which no formal complaint was submitted. The Success Rate is 99.9%
- At the close of a project via delivery-specific feedback gathered by Quality Assurance (success rate, complaint classification, CAPA)
- Through digital channels (client portals, email forms) or during account reviews and project meetings at key moments in the service journey.

Internal awareness and capability building

To strengthen the integration of consumer and end-user perspectives, Acolad trains operational, sales, and support teams on quality standards, accessibility, inclusive communication, and data-protection principles. These initiatives help teams understand user expectations and embed responsible practices into service delivery. Continuous awareness-raising ensures employees remain attentive to user needs and potential impacts.

Engagement through public-sector and NGOs

For services that reach vulnerable or at-risk populations, such as migrants, refugees, patients, and individuals relying on public services, Acolad collaborates with public institutions, NGOs, and humanitarian partners acting as legitimate representatives of end-users. These stakeholders share feedback on accessibility, cultural relevance, confidentiality and service adequacy, enabling Acolad to adapt its linguistic and communication support to sensitive contexts.

Governance and operational responsibility

Responsibility for ensuring that consumer and end-user feedback informs decision-making lies with the Customer Excellence Director, supported by the Customer Excellence, Quality Assurance, and Marketing teams. These teams consolidate insights from surveys, complaints, and project reviews and integrate them into strategic and operational plans. This governance structure ensures the user perspective is consistently considered across the organisation.

Monitoring and evaluation of engagement effectiveness

Acolad regularly assesses the efficiency of its engagement methods. Key indicators are monitored to measure the impact of actions taken on customer satisfaction, enabling strategies to be adjusted if necessary.

3.3.2.2 Processes to remediate negative impacts and channels for consumers and end-users to raise concerns (S4-3)

Acolad has set a comprehensive framework to ensure that consumers and end-users can raise concerns and that any negative impacts linked to its services are addressed in a timely and transparent manner. These mechanisms form part of the Group's broader commitment to service quality, ethical conduct, and stakeholder protection.

Clients and, indirectly, end-users can raise concerns at any point in the service lifecycle through several established channels, including client portals, email forms, post-delivery evaluations and dedicated communication with Account Management teams. Complaints and service issues are centrally managed through Acolad's Corrective and Preventive Action (CAPA) system, which ensures consistent classification, root-cause analysis and resolution.

All feedback is handled by the Quality Assurance (QA) team, who monitor indicators such as complaint rates, success rates, delivery accuracy and responsiveness. When issues are identified, corrective actions are formally documented, implemented and followed up to ensure effective remediation. This structured approach enables Acolad to address negative impacts, prevent recurrence and continuously improve service quality.

Acolad's Whistleblowing Procedure provides an additional secure and confidential channel for external stakeholders, including clients and end-users, to report concerns related to unethical behaviour, human rights, compliance breaches or other serious misconduct that may indirectly affect consumers or end-users. Reports can be submitted anonymously, and all cases are handled by the Legal team according to strict confidentiality and non-retaliation principles.

Upon receiving an alert, the Legal team conducts a preliminary assessment and, where relevant, transfers the case to the appropriate department for investigation. Follow-up actions may include remediation plans, changes in operational processes, engagement with the concerned stakeholder, or contractual measures depending on the severity and nature of the issue.

Acolad monitors the resolution of concerns raised through both customer feedback systems and the Whistleblowing Procedure. Each case is documented, tracked and reviewed to ensure proper closure and to evaluate the effectiveness of corrective actions. Insights from these processes are used to strengthen operational controls, improve communication with clients and reinforce service delivery standards.

3.3.3 Data privacy and cybersecurity (ESRS S1 – Employees; ESRS S4 - Consumers and end-users)

Data privacy and cybersecurity are essential priorities for Acolad, reflecting the nature of its business, which involves processing sensitive data, including client information, employee data, health-related content, legal documentation and multilingual material exchanged through its platforms. Ensuring the confidentiality, integrity and availability of this data is fundamental to maintaining client trust, delivering secure services and safeguarding the rights of all individuals involved.

The material impacts, risks and opportunities related to the data privacy and cybersecurity:

Acolad faces several potential negative impacts in relation to data privacy and cybersecurity, particularly due to the volume and sensitivity of information processed across its services. A breach involving clients, employees or end-users may result in the accidental or unlawful disclosure of confidential content, including personal, legal or health-related information. Such an incident could cause direct harm to vulnerable individuals, including refugees, migrants or patients supported through interpretation and translation services. It may also lead to reputational damage, loss of client confidence, operational disruption and legal consequences, especially where regulations such as the GDPR apply.

Key risks identified include cyberattacks or document theft leading to data leakage, misuse or unauthorized access. Additional risks may arise from improper data handling by freelancers or remote workers, particularly when unsecured tools or unreliable AI-based translation platforms are used. Unfair or non-compliant use of personal data for marketing purposes could also expose the organisation to sanctions and undermine stakeholder trust. Process inefficiencies in managing data subject requests or ensuring GDPR compliance may result in regulatory penalties and weaken the company's credibility in highly regulated environments.

3.3.3.1 Policies (S4-1)

Protecting the personal data of Acolad's clients, end-users, external linguistic vendors and employees is a core priority for the Group. Given the nature of Acolad's services, which involve handling multilingual content, legal and health-related documentation, client information and operational data, safeguarding confidentiality, integrity and availability of information is essential to maintaining trust and ensuring compliance with global regulatory requirements such as the GDPR.

In this context, Acolad has formalised a comprehensive set of policies that govern data protection and information security across all Group entities. These policies apply to all employees, contractors, and external vendors handling personal or confidential information on Acolad's behalf. They establish standard rules relating to the collection, use, retention, access, transmission and destruction of personal data, and promote an approach grounded in privacy-by-design and information security best practices.

Acolad's policies include the Data Privacy Policy, Information Security Policy, Cryptography Policy, Network Security Policy, Malware Protection Policy, and the Business Continuity Management Policy. Together, they define mandatory principles for data protection, secure system architecture, encryption, incident management, and resilience. Each entity must implement local procedures in line with these Group standards and ensure employees and vendors understand and adhere to them.

To steer these practices, Acolad has designated a Data Protection Officer (DPO) responsible for overseeing compliance with GDPR and local privacy laws, supporting subsidiaries in data management, advising on DPIAs, and ensuring correct implementation of data protection requirements. The DPO works with a network of local privacy correspondents within entities to coordinate actions, monitor risks, and respond to data-related inquiries.

Acolad's Information Security and IT Security teams lead the development of security controls, policies and monitoring systems to ensure the protection of the Group's IT environment. This includes vulnerability management, access control, encryption standards, and cybersecurity monitoring. The Business Continuity function ensures operational resilience and supports risk mitigation for major incidents affecting service delivery.

The role of the IT teams

Acolad's IT and Information Security teams implement technical and organisational measures aligned with ISO best practices and the Group's internal policies. These include:

- management of system and data access rights
- monitoring of privileged accounts
- network protection measures and secure configuration of applications
- encryption of data in transit and at rest, in line with the Cryptography Policy
- malware protection through real-time antivirus, blacklisting and email-scanning solutions
- periodic backups of data, applications and emails
- secure storage solutions for work files
- continuous monitoring of security events and incident response procedures.

3.3.3.2 Actions (S4-4)

To oversee data protection and ensure compliance across the organisation, Acolad has appointed a Group Data Protection Officer (DPO). The DPO coordinates global privacy governance and supports local teams in implementing data protection measures. Acolad also relies on a network of Data Protection Representatives and Information Security Officers within its subsidiaries, who ensure that local practices comply with the GDPR and applicable national regulations. This governance model enables the Group to continuously monitor compliance, address local requirements, and support operational teams in applying privacy-by-design and privacy-by-default principles.

Acolad maintains a structured compliance framework that includes regular audits, privacy impact assessments, third-party risk reviews and continuous monitoring of processing activities.

Key actions include:

- maintaining and updating Records of Processing Activities (RoPA)
- conducting risk assessments for new tools, platforms or vendors
- implementing Data Protection Impact Assessments (DPIAs) for high-risk processing
- applying retention, deletion and access-control rules aligned with GDPR
- ensuring cookie compliance and transparency on Acolad digital platforms.
- The IT Department plays a central role in safeguarding systems and data across the Group, Acolad deploys a range of cybersecurity controls, including:
- multi-factor authentication and strict user access management
- continuous monitoring of privileged and administrator accounts
- encryption of data at rest and in transit, following defined cryptographic standards
- network segmentation, firewall protection and secure VPN access
- anti-malware protection across all endpoints, servers and cloud environments
- regular vulnerability scanning, penetration testing and security hardening
- scheduled backups of applications, databases and email environments
- secure storage and disaster-recovery procedures under the Business Continuity Management Policy.

To support employees in meeting data protection obligations, Acolad provides dedicated procedures, templates and tools for managing individual rights requests, reporting potential breaches, and ensuring compliance in projects that involve personal data. The DPO and Information Security teams regularly publish internal guidance and provide case-by-case advice on secure processing, vendor assessments, contract clauses, and the implementation of privacy controls in new services or digital tools.

Acolad evaluates the data protection practices of suppliers and freelancers who process personal data on its behalf. Contractual agreements include GDPR-compliant clauses, confidentiality obligations and security requirements. Vendors with higher data-processing exposure are subject to strengthened due diligence, including questionnaires, documentation reviews and periodic reassessment. This approach ensures that third parties contributing to Acolad's services uphold equivalent levels of data protection.

Acolad supports a culture of privacy and security through continuous training. Mandatory e-learning modules on GDPR, information security, phishing awareness and secure data handling are available to all employees. Awareness campaigns, newsletters and periodic reminders reinforce good practices, while simulated phishing exercises help employees recognise and respond to cyber risks. New employees receive dedicated data protection onboarding as part of their induction process

3.3.3.3 Metrics and targets (S4-5)

In order to cover the commitments made to end-users to process their personal data within a framework that complies with regulations, and to ensure them the most secure control of their personal data, Acolad monitors compliance through the following three internal indicators:

The Training Completion Rate measures the share of employees who completed the mandatory cybersecurity training during the year. The Phishing Campaigns Reporting Rate represents the percentage of employees who correctly reported simulated phishing emails. The Phishing Campaigns Compromised Rate measures the proportion of users who clicked or submitted credentials during these simulations.

Year	Cybersecurity Training Completion Rate Target ≥	Result	Phishing Reported Rate Target ≥	Result	Phishing Compromised Rate Target ≤	Result
2023	88%	88%	13.5%	13.7%	10%	6.5%
2024	92%	94%	17%	40%	7%	2%
2025	96%	99.69%	20%	26.18%	5%	3.37%
2026	100%	-	25%	-	5%	-
2027	100%	-	27%	-	4%	-
2028	100%	-	28%	-	4%	-

4 Governance information - Business conduct (ESRS G1)

Ethical business conduct at Acolad is supported by a robust compliance framework. Impacts and risks related to business conduct are closely monitored, and mitigation measures and programs are in place to prevent corporate or employee misconduct. Corporate governance, including decision-making structures, internal control mechanisms and compliance policies, plays a central role in Acolad's global strategy. It ensures that the Company adheres to the highest ethical standards and acts responsibly towards all its stakeholders.

Acolad's governance practices are designed to ensure transparency, reinforce accountability and promote a culture of compliance and integrity across the organisation. This includes the supervision of business conduct policies, regular assessment of ethical risks, and the implementation of a secure whistleblowing procedure enabling employees and external parties to report behaviour that breaches internal rules or applicable laws.

4.1 Governance: the role of the administrative, management and supervisory bodies (ESRS 2 GOV-1)

Acolad has established a solid governance structure grounded in the complementary expertise of its legal, human resources, compliance, risk and CSR functions. This structure ensures that the Group conducts its business responsibly and ethically, while complying with all applicable laws and internal codes. It also equips the organisation to address key challenges such as data protection, corruption prevention and responsible business conduct. Please refer to sections 1.2.1 and 1.2.2 of the ESG report for more information on this subject.

The Operational Management Board, supported by the Legal, Risk & Compliance and Human Resources Departments, oversees the implementation of Acolad's ethical framework. This includes supervision of the Code of Conduct and Ethics, the Whistleblowing Procedure and the Group's wider governance policies, ensuring their consistent application and alignment with regulatory requirements across all entities.

To strengthen oversight, Acolad has established a Whistleblowing Management Committee as well as two dedicated governance bodies: the CSR Committee and the Risk Committee. The Whistleblowing Committee, composed of the Legal Director and the Chief People and Culture Officer, manages alerts, investigations and remediation. The CSR and Risk Committees monitor ESG performance, compliance, cybersecurity and ethical risks, supporting transparency and accountability throughout the organisation.

Senior management plays a central role in applying governance frameworks by deploying internal controls and monitoring processes designed to prevent and detect misconduct. Their combined expertise in compliance, human resources, ethics and risk management ensures effective oversight of material ethical risks, including corruption, discrimination and data protection issues, reinforcing Acolad's commitment to strong and responsible governance.

4.1.1 Description of the processes to identify and assess material impacts, risks and opportunities (ESRS 2 IRO-1)

As a global provider of content and language solutions, Acolad operates at the intersection of technology and linguistic expertise. Acting as a trusted partner is essential to the Group's mission, particularly when supporting clients in regulated sectors such as healthcare, legal services, public sectors and international organisations. Ensuring the integrity of business conduct throughout Acolad's value chain is therefore central to maintaining client trust and safeguarding long-term relationships.

Acolad's ethical business practices focus on preventing risks related to corruption, conflicts of interest, discrimination, data privacy and cybersecurity. The Group's Code of Conduct and Ethics, Whistleblowing Procedure and compliance framework collectively reinforce responsible practices, transparency and adherence to international and local regulations across all operations.

These measures enable Acolad to identify, assess and mitigate risks while also capturing opportunities linked to strong ethical performance. Maintaining high standards of integrity strengthens the Group's reputation, enhances stakeholder confidence and supports sustainable growth in a competitive and rapidly evolving industry.

The process to identify material impacts, risks and opportunities is described in section 1.4.1 "General information (ESRS 2)" of this ESG report.

4.1.2 Corporate culture and business conduct policies (G1-1)

Acolad's corporate culture is grounded in integrity, respect, collaboration and accountability. These values guide the behaviour expected from all employees and form the foundation of responsible business conduct across the Group. To support this, Acolad has formalised its ethical standards in the Acolad Code of Conduct and Ethics, which applies to all employees, contractors and temporary staff. The Code outlines the Group's commitments regarding business ethics, anti-corruption, data protection, human rights and professional conduct, and serves as a reference framework for everyday decision-making.

The Code of Conduct and Ethics is shared with all new employees during the onboarding process, who are required to acknowledge and adhere to its principles as part of their integration. The Code is

accessible at any time through the Group's website, intranet and GMS platform. It is complemented by a set of detailed internal policies, including the Whistleblowing Procedure, the Anti-Harassment and Anti-Discrimination Policy and the Human Rights Policy, which together provide a comprehensive framework guiding ethical behaviour across the organisation.

Mechanisms for reporting and investigating unlawful behavior or behavior contrary to the code of conduct:

Acolad has a legal obligation to implement an appropriate whistleblowing procedure in accordance with French "Sapin II" Law and the European Directive on the protection of whistleblowers. The aim is to provide a secure and structured framework for receiving and analysing alerts relating to potential breaches of the Acolad Code of Conduct and Ethics, internal policies or applicable laws. The procedure covers a wide scope of issues, including corruption, fraud, conflicts of interest, discrimination, harassment, violations of human rights, environmental risks, health and safety concerns, and any serious breach of laws or regulations. The whistleblowing procedure is available to all internal and external stakeholders who have first-hand information and act in good faith.

To complement usual reporting channels such as the line manager or relevant functional teams, Acolad has implemented a formal whistleblowing pathway accessible through the misconduct form available on the Group website. Alerts may also be raised through external channels such as the Human Rights Defender or judicial authorities. Reports can be submitted anonymously provided they contain sufficient detail to allow an investigation. Anonymous alerts that do not include enough information are considered inadmissible.

Acolad's non-retaliation guarantee protects anyone who raises a concern in good faith. The whistleblower's identity, as well as that of any person involved in the alert, remains strictly confidential and may only be disclosed when legally required. When a report is received, the Whistleblowing Procedure Officer acknowledges its receipt within seven working days. The admissible alerts are then reviewed by the Whistleblowing Management Committee, which is composed of the Legal Director and the Chief People and Culture Officer and may involve additional experts depending on the case. The Committee ensures that reports are analysed objectively, that investigations are conducted internally or externally when required, and that appropriate corrective or remedial actions are implemented.

The Committee members receive training on the use of the platform, reporting procedures, deadlines and whistleblower protection measures. This includes a reminder that the whistleblower's identity cannot be disclosed to third parties, except as required by law.

To ensure compliance with regulatory timelines, the whistleblower is informed of the measures planned or taken within three months of the acknowledgement of the alert. Upon completion of the investigation, the Committee formally closes the case and records its conclusion. All information collected is handled in accordance with GDPR requirements, internal data protection rules and legally mandated retention periods.

The main steps of the procedure are as follows:

- Reception of the alert and acknowledgement within seven working days.
- Verification of admissibility and assessment by the Whistleblowing Procedure Officer.
- Analysis and investigation conducted by the Whistleblowing Management Committee, with additional experts when necessary.
- Communication to the whistleblower on follow-up actions within three months.
- Implementation of corrective or preventive measures when required.
- Formal closure of the case by the Committee and secure retention of information in compliance with GDPR.

This combination of a structured whistleblowing framework, robust confidentiality safeguards and targeted ethics training strengthens Acolad's culture of integrity and supports responsible behaviour across all Group entities. No incidents were reported through any of internal and external channels during the 2025 reporting cycle.

4.1.3 Management of relationships with suppliers (G1-2)

Acolad manages social, ethical and environmental risks within its value chain through its responsible procurement practices and supplier engagement processes. The Group aims to promote sustainability across its supply base by encouraging suppliers to adopt responsible practices, minimise their environmental impact and uphold strong ethical standards. These expectations are integrated through supplier assessments, due diligence questionnaires and regular communication with key suppliers.

The Supplier and Vendor Contract Annex – General Terms and Conditions outlines Acolad's expectations on human rights, anti-corruption, environmental protection, labour practices, data protection and business ethics. It applies to all suppliers, contractors and freelancers collaborating with the Group.

Suppliers are asked to make every effort to:

- comply with Acolad's ethical, legal and human-rights standards across all activities
- assess and minimise their environmental footprint
- maintain secure data-protection practices and ensure GDPR-compliant handling of personal and customer data.

4.1.4 Prevention and detection of corruption and bribery (G1-3)

In line with its commitments as a participant of the United Nations Global Compact, Acolad has implemented a structured anti-corruption framework consistent with the requirements of the French Sapin II law. This framework supports the Group's commitment to transparency, integrity and ethical business conduct across all operations. It also complies with the principles set out in the United Nations Convention against Corruption.

Under the oversight of the CEO, Legal and the Risk and Compliance teams, Acolad has deployed an anti-corruption system that applies to all subsidiaries. This system is built on the principles and obligations defined in Acolad's Code of Conduct and Ethics, which incorporates anti-corruption and anti-bribery provisions, rules on gifts and invitations, conflicts of interest, sponsorship, third-party integrity, and a whistleblowing procedure available to all employees.

Although Acolad operates in a professional services environment where corruption risks are generally low, a structured risk assessment is maintained. The Group recognises that certain functions may face higher exposure, including sales and business development teams involved in tendering or public procurement processes, and procurement teams managing supplier relationships in diverse regulatory contexts. Acolad's global footprint may also create variations in local legal frameworks and cultural practices, which the Group proactively manages through internal controls and awareness measures.

4.1.4.1 Policies

Acolad's Code of Conduct and Ethics and its Anti-corruption and Anti-bribery principles apply to all Group employees, regardless of position or contractual status. These documents are approved by the Group's highest governing bodies and accessible through the intranet, Global Management System and Acolad's corporate website.

The anti-corruption principals include rules on gifts and invitations, conflicts of interest, sponsorship and patronage, prevention of illegal payments, prohibition of facilitation payments, insider dealing, and third-party integrity checks. All employees are required to comply with these provisions and to seek guidance when in doubt.

4.1.4.2 Actions

All employees complete mandatory conduct training, including anti-corruption and anti-bribery rules, ethical behaviour and the principles outlined in the Code of Conduct and Ethics. The Code of Conduct and Ethics is shared with all new employees during the onboarding process, who are required to acknowledge and adhere to its principles as part of their integration. The Code is accessible at any time through the Group's website, intranet and GMS platform.

The implementation of anti-corruption measures within Group entities is mapped and assessed by Legal Departments and Risks committees.

4.1.4.3 Metrics and targets

Given its low inherent risk profile, Acolad's priority is to ensure full coverage of prevention measures. Although certain roles are more exposed to corruption risks, the Group is currently deploying its e-learning anti-corruption and anti-bribery training. This module will be fully integrated into the Group's Learning Management System from 2026. No corruption or bribery incidents were reported during the 2025 reporting cycle.

4.1.5 Incidents of corruption or bribery (G1-4)

In 2025, neither the Group nor its subsidiaries, nor any of their employees, were subject to convictions or fines related to violations of anti-corruption or anti-bribery laws. The Legal Department is not aware of any substantiated cases of corruption or bribery during the reporting period.

Acolad did not identify any confirmed incidents of corruption or bribery within its value chain involving the company or its employees in 2025.

4.1.6 Political influence and lobbying activities (G1-5)

Acolad operates in the professional services and digital content sector, which is not characterised by activities requiring lobbying, public policy influence or regulatory advocacy. The Group does not engage in political campaigning, make political donations, or participate in lobbying initiatives at local, national or European level.

Given the nature of its business model, Acolad's interactions with public authorities are strictly limited to operational or regulatory compliance matters, such as data protection, labour legislation and procurement requirements. The Group ensures neutrality in all political matters and maintains clear internal rules to prevent any use of company resources for political purposes.

4.1.7 Payment practices (G1-6)

4.1.7.1 Policies

Acolad has established clear payment procedures to ensure transparent, efficient and fair financial transactions with suppliers. These processes offer a consistent framework for managing invoices, purchase orders and cash disbursements across the Group. They support timely payments, minimise operational and compliance risks and reinforce ethical supplier relationships. Payment governance is overseen jointly by the Procurement, Finance and Business Operations teams, who monitor adherence to contractual terms, ensure regulatory compliance and maintain operational efficiency.

All relevant payment process guidelines are accessible internally through Acolad's accounting management systems and procurement tools. These procedures apply to all supplier categories, including freelancers, linguistic vendors, technology partners and facility service providers.

Consideration given to stakeholder interests

Acolad ensures that payment expectations are communicated clearly during onboarding and throughout the supplier relationship. Procurement and Finance departments emphasise the importance of timely payments, recognising their influence on supplier trust, operational continuity and regulatory compliance. Internal stakeholders receive guidance on legal obligations related to payment deadlines, particularly in France where statutory limits apply.

Approach to relationships with suppliers

Acolad's commitment to ethical supplier relationships is anchored in the Code of Conduct and Ethics, Purchasing Policy and Vendor Management Policy. These documents set expectations for transparency, integrity and responsible business conduct. The Group works with a broad base of freelancers, vendors and technology partners, making consistent communication and fair payment practices essential to sustaining trust and reliability.

4.1.7.2 Actions

Acolad recognises that timely supplier payments are essential to maintaining strong relationships and trust across its value chain. Following insights gathered from the 2025 Vendor Survey, which highlighted dissatisfaction with payment processes and administrative complexity, several actions have been launched to address these issues and mitigate related operational and reputational risks.

To improve efficiency and vendor experience, Acolad has initiated a central purchasing model, with a pilot hub in Luxembourg starting in December 2024. This centralisation will simplify administrative procedures, eliminate the need for tax residency certificates (TRCs) in most cases, and allow vendors working across several Acolad entities to issue a single invoice instead of multiple entity-specific ones. These measures are expected to significantly reduce complexity and accelerate payment processing.

In parallel, the Finance and Procurement teams are reviewing payment term compliance with local legislation to ensure alignment across countries. Adjustments have already been made in certain markets, such as reverting from 45 days EOM to 30 days in the Netherlands, in line with national legal requirements.

Furthermore, Acolad has strengthened collaboration between Vendor Management and Marketing to enhance communication and visibility on vendor-related initiatives, while appointing a Vendor Community Manager to oversee continuous engagement and feedback.

Through these initiatives, Acolad aims to improve payment efficiency, ensure legal compliance, and enhance vendor satisfaction, thereby reducing financial and operational risks while reinforcing fair and transparent business practices across the Group.

4.1.7.3 Metrics and targets

Acolad monitors average payment periods across its main supplier categories. Based on the invoices processed during the 2025 reporting cycle:

- Average number of days to pay: 45 days
- Payment term structure:
  - 75% of payments follow a 50-day term;
  - 25% follow a 30-day term.

Supplier Category	Standard Payment Term	Percentage of Payments Made on Time
Linguistic Freelancers and Vendors	45 days	80%
Suppliers (excluding France)	30 days	90%
Suppliers (France)	45 days	90%

For the reporting year 2025, Acolad is not aware of any legal proceedings related to late payments. Acolad is committed to maintaining fair, transparent and responsible supplier relationships. The Group recognises that late payments can affect supplier financial stability, particularly for freelancers and SMEs operating in the language services sector. Acolad mitigates this risk by maintaining clear procurement processes, monitoring payment performance and ensuring that invoices meet the necessary requirements to avoid delays.

To support efficiency and on-time payments, Acolad requires suppliers to:

- Submit invoices in digital format.
- Provide accurate purchase order or reference details.
- Ensure that invoices comply with local legal and tax requirements.

Guidance and invoicing instructions are made available through Acolad's supplier onboarding materials.

5 Assurance Report

To Mr. Bertrand Gstalder,

Chief Executive Officer

In our capacity as independent assurance practitioner of your company, we have undertaken a limited assurance engagement on the information relating to greenhouse gas emissions prepared on a voluntary basis by Acolad Group (hereinafter "the Entity"), with regard to the GHG Protocol and Bilan Carbone® (hereinafter the "Reporting Framework"), for the financial year ended December 31, 2025 (hereinafter the "Information"), set out in the document attached to this report, entitled "Information relating to greenhouse gas emissions" (hereinafter the "Statement"), and prepared at the request of the investors of the Acolad Group.

5.1 Limits assurance conclusion

Based on the procedures we have performed, as described under the section "Nature and scope of procedures", and the evidence we have obtained, nothing has come to our attention that causes us to believe that the Information is not prepared, in all material respects, in accordance with the Reporting Framework.

5.2 Preparation of the information

The absence of a commonly used, generally accepted reporting framework or established practice on which to draw, to evaluate and measure the Information allows for different, but acceptable, measurement techniques that can affect comparability between entities and over time.

Consequently, the Information needs to be read and understood together with the Reporting Framework, available in the Statement. The significant elements of the Reporting Framework are set out in the Statement.

5.3 Preparation of the information

The Information should be read and understood with reference to the Framework, the key elements of which are presented in the methodological note ("Basis for preparation") included in the ESG report.

5.4 Inherent limitations in the preparation of the information

The Information may be subject to inherent uncertainty arising from the state of scientific knowledge and from the quality of the external data used. Certain information is sensitive to the methodological choices, assumptions and/or estimates applied in preparing it.

5.5 Responsibility of the entity

The Information has been prepared under the responsibility of the Entity's Management, which is responsible for:

- Selecting or establishing appropriate criteria for the preparation of the Information;
- Preparing the Information in accordance with the Framework; and
- Designing, implementing, and maintaining effective internal control over the relevant information for the preparation of the Information, to ensure the absence of material misstatements, whether due to fraud or error.

5.6 Responsibility of the auditor

We are responsibility for:

- Planning and performing the engagement to obtain limited assurance that the Information has been prepared, in all material respects, in accordance with the Framework;
- Forming an independent conclusion based on the work performed and the evidence obtained;·
- Reporting our conclusion to the entity's management.

As we are engaged to form an independent conclusion on the Information as prepared by Management, we are not permitted to be involved in the preparation of the Information, as doing so may compromise our independence.

5.7 Applicable professional standards

We performed the work described below in accordance with the professional guidance issued by the Compagnie nationale des commissaires aux comptes (CNCC) applicable to such engagement.

This work does not constitute an audit or a review within the meaning of the professional standards applicable in France. Nor does it constitute a "certification" in accordance with the guidelines of the Haute Autorité de l'Audit (H2A).

5.8 Independence and quality management

Our independence is defined by the provisions of the French Commercial Code (Code de commerce) and the French Code of Ethics for Statutory Auditors (Code de déontologie).

In addition, we have designed, implemented and operated a system of quality management including policies and procedures regarding compliance with ethical requirements, professional standards, applicable legal and regulatory requirements as well as French professional guidance.

5.9 Nature and scope of the procedures

We planned and performed our work, described below, to address the areas where we have identified that a material misstatement of the Information is likely to arise. As part of our limited assurance engagement and based on our professional judgment, we:

- updated our understanding of the Entity and its environment, including the internal control components relevant to the preparation of the Information, and the nature of the activities and the business model likely to impact greenhouse gas emissions data;
- assessed the suitability of the Reporting Framework's criteria with regard to their relevance, completeness, reliability, neutrality and understandability, taking into account, where appropriate, best industry practices;
- obtained an understanding of internal control procedures implemented by the Entity aimed at ensuring the compliance of the Information with the Reporting Framework;
- assessed whether the methods used by the Entity to prepare the Information are appropriate with regard to the Reporting Framework and, where applicable, assessed the relevance of changes in methods and assumptions;
- verified that the Information has been prepared within the scope indicated in the Reporting Framework;
- selected, based on our professional judgment, the most important items of Information, for which we:
    - performed analytical procedures to verify the consistency of any changes in those data and, where necessary, requested explanations from Management regarding any unusual identified items;
    - performed tests of details, using sampling techniques or other selection methods, in order to verify the correct application of the calculation methods and assumptions described in the Reporting Framework and reconcile the underlying data with the supporting documentation;
    - for estimates considered significant in the preparation of the greenhouse gas emission inventory: through interviews with the CSR Project Manager, we obtained an understanding of the method used to calculate the estimated data. We assessed the appropriateness and correct application of this method, as well as the appropriateness of the sources of information used;
    - verified the arithmetical accuracy of the calculations used to establish the Information;
    - assessed the overall consistency of the Information in relation to our knowledge of the Entity;

We consider that the evidence we have obtained is sufficient and appropriate to support our conclusion.

The procedures performed in a limited assurance engagement are less extensive than for a reasonable assurance opinion in accordance with the French professional guidelines. A higher level of assurance would have required us to carry out more extensive procedures.

5.10 Restrictions on distribution and use

This report has been prepared solely for your attention within the context described in the first paragraph and may not be used, distributed or referred to for any other purpose.

Our work should not be taken to supplant any additional inquiries or procedures that should be undertaken by a third-party recipient of this report, and we make no representations regarding the sufficiency of the procedures we performed for the purposes of third parties.

Our responsibility towards Acolad Group is defined by French law and we do not accept any extension of our responsibility beyond that set out in French law. We do not owe or accept any duty of care to any third party. In no event shall BM&A be liable for any loss, damage, cost or expense arising in any way from fraudulent acts, misrepresentation or wilful misconduct on the part of the Directors, employees or agents of Acolad Group.

This report is governed by French law. The French courts have exclusive jurisdiction in relation to any claim, difference or dispute which may arise out of or in connection with this report.

Paris, June 30, 2026

The statutory auditor

BM&A

Marie-Cécile Moinier

acolad.

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