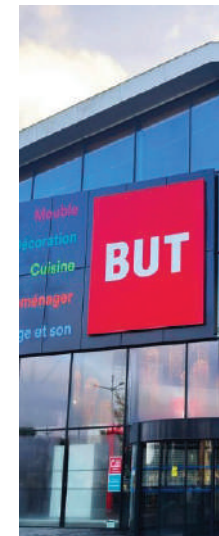
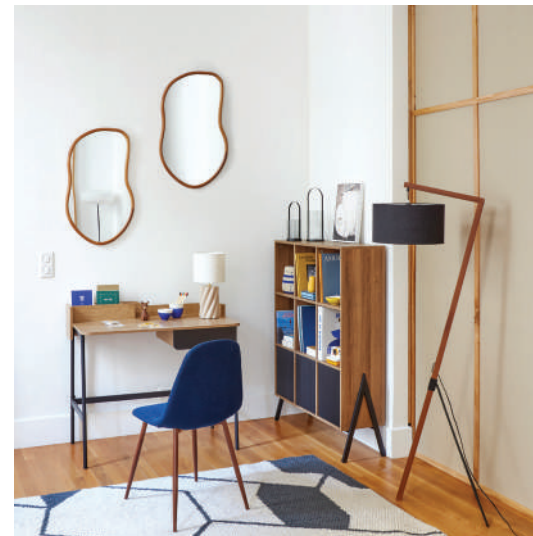


# Due Diligence Plan 2024





BUT-Conforama is committed to making furniture, home equipment, and interior decoration accessible to as many people as possible. As the leading network in France for home equipment and a key player in the furniture industry, our brands are also aware of the potential environmental, social, and economic impacts of their activities..

**Our goal is to fundamentally transform our model to contribute to the crucial transition toward sustainable homes.**

# Regulatory framework

In accordance with French law no. 2017-399 of March 27, 2017, on the due diligence of parent companies and subcontracting companies, BUT and Conforama are implementing a joint Due Diligence Plan covering their activities, as well as those of their suppliers and subcontractors with whom they maintain an established business relationship.

This Due Diligence Plan aims to identify, prevent, and mitigate risks related to human rights and fundamental freedoms, the health and safety of individuals, and the environment.

This Due Diligence Plan consists of six key components :

- An introductory section detailing contextual elements such as governance, scope, and the Group's manifesto;
- Risk mapping aimed at identifying, analysing, and prioritising risks associated with the Group's various activities;
- Regular assessment procedures for subcontractors or suppliers with whom an established business relationship exists, based on the risk mapping;
- Tailored risk mitigation actions and measures to prevent serious harm;
- Whistleblowing systems and reporting channels;
- Monitoring systems to track measures and evaluate their effectiveness.

# Group manifesto

1.

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BUT-Conforama aspires to be the leading reference for accessible home equipment while being more environmentally responsible. As distributors of furniture, decoration, and household appliances, BUT-Conforama acknowledges its responsibility towards society and the environment, as well as the impacts resulting from its activities.

A joint BUT-Conforama cross functional CSR Committee is currently being established (following the former committees specific to each brand) to promote and integrate the CSR policy across all internal and external activities of the Group. Our duty of care approach is fully embedded in our CSR strategy, ensuring that all our actions and decisions align with our commitments to social and environmental responsibility..

To anticipate and support societal changes, we rely on key texts and guiding principles, including:

- The United Nations Guiding Principles on Business and Human Rights;
- The principles set out in the ILO conventions;
- The ILO Tripartite Declaration;
- The OECD Guidelines for Multinational Enterprises;

- The principles of the United Nations Global Compact, including the Universal Declaration of Human Rights and the Sustainable Development Goals (17 SDGs).

Each of BUT-Conforama's actions is driven by a commitment to the sustainable development of its brands. While rooting in local communities and solidarity are strong markers of our identity, we are also committed to participating in and supporting forest conservation, the expansion of the circular economy, respect for diversity, and equal opportunities.

Committed to transparency about the challenges we face, we have designed this first joint Due Diligence Plan as an overview that reflects our current practices and the areas for improvement we have identified.

It outlines the methods followed, the policies, actions, and measures already in place, as well as the additional measures taken within the framework of the duty of care.

This Due Diligence Plan, developed in collaboration with the brands' stakeholders, is updated annually to document the risk mitigation and serious harm prevention actions undertaken, along with their outcomes and follow-up. Risk mappings, meanwhile, will be fully updated every four years to reflect changes in the business environment.

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# FRAMEWORK OF THE DUE DILIGENCE PLAN



# 1.1 Context & scope of the Due Diligence Plan

## 1.1.1 Overview of the BUT-Conforama Group

The holding company Mobilux, which brings together the XXXLutz Group and CD&R, has owned BUT in France since 2016 and Conforama since 2020, with the creation of “the Alliance”. Its ambition is to enable the two leading French home furnishing brands to remain competitive against global industry giants.

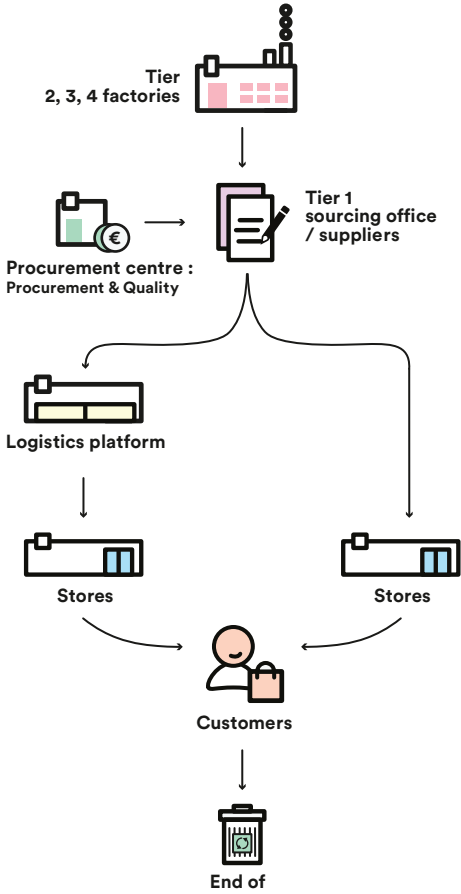
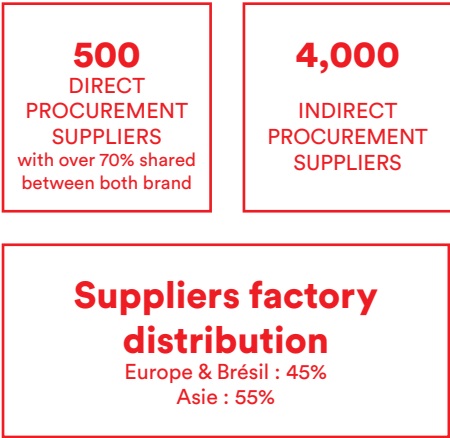
December 2024 marks a new milestone with the creation of BUT-Conforama Holding France SAS. The new parent company will be French and will own both BUT and Conforama, which will remain independent of each other, preserving their unique identities, core values, and distinct, competitive business strategies. The creation of the BUT-Conforama Group will provide a clearer framework for cooperation and the ongoing improvement of performance between the two brands, strengthening both in an increasingly competitive environment.

The Group also aims to reinforce its position as a key representative of the sector with regard to public authorities and will continue to play a crucial role in innovation, the ecological transition, and support for the French furniture manufacturing industry.



## Our product supply chain:

- **OUR PRODUCTS:**  
Furniture, Decoration,  
Household appliances
- **TIER 2, 3, 4 factories :**  
are the subcontractors of Tier 1 suppliers (referenced by the retailer and delivering the finished product) that supply raw materials, components, or semi-finished products.



1.1.2 Presentation of the Due Diligence Plan’s scope

The scope of this Due Diligence Plan covers the activities of BUT and Conforama, as well as their suppliers and subcontractors. As a holding company, Mobilux and its other subsidiaries are not included in the scope of this plan.

The activities of BUT-Conforama involve:

- The brands’ offices, including headquarters and shared service centres (accounting centres);
- 377 integrated stores (211 BUT, 166 Conforama);
- 3 logistics platforms;
- Supply chains related to direct and indirect procurement.

Although franchises are not currently included within this scope, our goal is to progressively integrate them in the medium term, whether through the analysis of associated risks or the development of dedicated action plans to address these risks. Consequently, products independently purchased by franchised stores are also not included in the scope of this Due Diligence Plan. BUT-Conforama is also committed to communicating and promoting its commitments beyond its direct activities.

In this Due Diligence Plan, when the terms “we” or “BUT-Conforama” are used, they refer to this defined scope.

1.2 Governance of the Due Diligence Plan

CSR is a cross-functional matter managed at the BUT-Conforama Group level, involving multiple key departments in its implementation and monitoring. Due diligence currently has a dedicated governance framework: the Due Diligence Plan is overseen and driven by the Public Affairs, Institutional Communication, and CSR Department. Similar to the cross functional CSR Committee, the BUT-Conforama Joint Due Diligence Committee is in the process of being established. This committee will bring together various strategic departments responsible for implementing the approach, including Public Affairs (responsible for CSR), Risk Prevention, Quality, and Procurement.

The diversity and representativeness of the committee members will ensure a detailed update of the Due Diligence Plan, leveraging the technical and operational expertise of industry professionals. The committee will be involved in every key stage, from risk identification to the implementation of action plans.

The Due Diligence Committee will meet once a year to monitor the measures implemented and integrate new action plans to prevent newly identified risks and violations.



A person with long blonde hair is seen from the back, wearing a red t-shirt. The t-shirt has white text printed on it. The background is a soft-focus outdoor scene.

Conforama  
Je suis là pour vous

2.

**RISK  
MAPPING**

To date, BUT and Conforama each rely on their own independently conducted risk mapping. The Group plans to establish a joint human rights and environmental risk mapping in 2025, based on a comprehensive materiality analysis and the specific challenges of each activity.

This new risk mapping will be grounded in the findings of the ongoing double materiality analysis and will serve as the guiding framework for the future BUT-Conforama Joint Due Diligence Strategy.

## 2.1 BUT risk mapping

To achieve a more detailed analysis of risks related to human rights and fundamental freedoms, health and safety; as well as the environment, three separate risk mappings have been conducted: procurement, internal operations, and marketplace.

These mappings help to better identify the specificities of our various activities, each of which presents different contexts and types of risks. This distinction enables the customisation of action plans according to the specific characteristics of each activity.

### 2.1.1 Risk mapping related to supply chains (procurement)

The procurement risk mapping outlines the sustainability-related risks associated with the products and services purchased by the company. The objective is to identify the most exposed purchasing categories to guide decision-making.

## RISK ANALYSIS METHODOLOGY

**1| Categorisation of products and services:** product families with similar environmental and social challenges have been grouped together to facilitate analysis and monitoring of action plans. This categorisation was based on the primary raw materials used in the products sold (such as wood, plastic, and glass). The product’s country of origin was also considered in the analysis.

The different categories were analysed using a lifecycle approach, assessing risks from raw material extraction/production to the end of the product’s life.

### CATEGORIES ANALYSED:

DIRECT PROCUREMENT					
WOOD / WOOD-BASED PANELS	COTTON	PLASTICS	MINERAL MATERIALS	PLANT-BASED MATERIALS	SYNTHETIC MATERIALS (TEXTILES)
GLASS	FERROUS METALS	NON-FERROUS METALS	LEATHER	PACKAGING	BULBS AND LEDS
INDIRECT PROCUREMENTS					
INTELLECTUAL SERVICES: ON-SITE AND REMOTE		MOBILE SERVICES: GREEN SPACE MAINTENANCE, SECURITY SERVICES, TECHNICAL MAINTENANCE, EVENTS (FOOD SERVICES, ROOM RENTAL, FURNITURE)		HOUSEKEEPING AND CLEANING SERVICES	
HYGIENE PRODUCTS	OFFICE SUPPLIES	COMMUNICA-TION TOOLS	ELECTRICITY	VEHICLES	IT EQUIPMENT

**2 | Identification of existing practices:** a review of current practices was conducted through consultations with internal stakeholders. Over a four-month period, multiple interviews were held with industry experts to identify risks and the prevention and mitigation actions already in place, including monitoring practices, risk mapping, and measures for prevention, limitation, and remediation.

**3 | Development of the risk analysis framework (see table below):** the social, societal, environmental, and ethical risks to be assessed in procurement were identified based on key international standards (e.g. ISO 26000, GRI, SA8000) as well as bibliographic reports (Planetary boundaries, IPCC report, French Environment and Energy Management Agency, International Labour Organization, and NGO reports from organisations such as WWF, Greenpeace, and Amnesty International).

**RISKS ANALYSED:**

ENVIRONMENTAL	SOCIAL	ETHICAL	SOCIETAL
<ul style="list-style-type: none"> <li>• Consumption of renewable and non-renewable resources</li> <li>• Risk of water, air, and soil pollution</li> <li>• Waste production</li> <li>• Contribution to climate change</li> <li>• Harm to biodiversity</li> </ul>	<ul style="list-style-type: none"> <li>• Illegal/forced labour/child labour</li> <li>• Discrimination and harassment</li> <li>• Working hours and remuneration</li> <li>• Health and safety</li> </ul>	<ul style="list-style-type: none"> <li>• Corruption</li> <li>• Data confidentiality</li> </ul>	<ul style="list-style-type: none"> <li>• Impact on local communities (discrimination, displacement)</li> <li>• Impact on the health and safety of local communities</li> <li>• Impact on the health and safety of consumers</li> </ul>

The resulting framework provides a comprehensive list of potential risks associated with each category across the entire lifecycle of the product or service.

**4 | Risk assessment:** risks were assessed on a scale from 1 to 4, where 1 represents a low risk with limited probability and impact, and 4 represents a high risk with a strong probability and severe impact. This rating system allows for an objective comparison between different categories.

Members of the former Due Diligence Committee were also interviewed, and certain internal experts participated in the risk assessment process.

In addition to the probability and severity of an event occurring, the risk level was adjusted based on environmental factors, working conditions, and more normative or geographical factors affecting suppliers within a given procurement category. Specific supply chain challenges in certain countries were also assessed, particularly for the wood category (Eastern Europe and Brazil) and metals (Democratic Republic of the Congo and China).

**2.1.2 Internal risk mapping**

BUT is responsible for anticipating, minimising, and controlling the impact of its internal activities. Internal risks are those directly linked to the company’s operations.



The risks analysed within this scope include those related to:

- the headquarters and shared service centres
- integrated stores
- logistics platforms and the sourcing office

This assessment considers both the company’s employees and customers in integrated stores.

An initial internal risk mapping was conducted in 2020. The former Due Diligence Committee had developed a risk assessment methodology to rank these risks by priority.

RISKS ANALYSED:

ENVIRONMENTAL	SOCIAL	ETHICAL
<ul style="list-style-type: none"><li>• Consumption of renewable and non-renewable resources</li><li>• Risk of water, air, and soil pollution</li><li>• Waste production</li><li>• Contribution to climate change</li><li>• Harm to biodiversity</li></ul>	<ul style="list-style-type: none"><li>• Illegal/forced labour/child labour</li><li>• Discrimination and harassment</li><li>• Working hours and remuneration</li><li>• Health and safety</li></ul>	<ul style="list-style-type: none"><li>• Corruption</li><li>• Data confidentiality</li></ul>

Each risk was rated based on its probability of occurrence, its impact (severity), and the company’s ability to detect or mitigate the hazard.

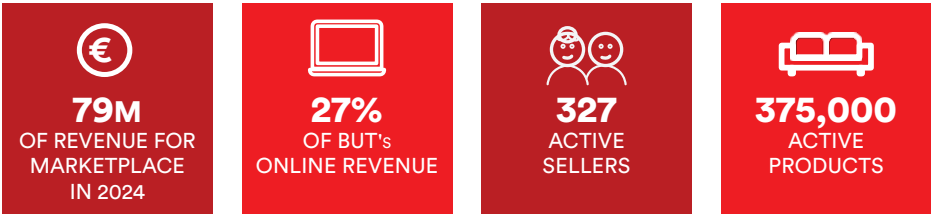
To ensure consistency, this internal risk mapping was revised and updated in 2023. It follows a methodology similar to that used for procurement risk mapping, assessing the impact of each risk in relation to the company’s activities on the environment, human rights and fundamental freedoms, as well as the health and safety of employees and customers.

2.1.3 BUT Marketplace risk mapping

In 2023, BUT sought to expand its risk analysis to a broader sphere of influence. Given that Marketplace activity represents a significant and growing part of the company’s operations, a dedicated risk mapping was developed in collaboration with the Marketplace manager.

The risk analyses were conducted using the same methodology as the procurement risk mapping, assessing potential environmental, social, and societal impacts. This initial Marketplace-specific risk mapping has helped prioritise the actions to be implemented in the coming years. A joint BUT and Conforama Marketplace charter is planned, outlining best practices to be adopted on this subject.

BUT MARKETPLACE KEY FIGURES:



## 2.2 Conforama risk mapping

Conforama, on the other hand, developed a non-financial risk mapping in 2021, which was reassessed in 2023. This mapping aligns with both the due diligence approach and the broader CSR strategy.

For the next risk mapping update, BUT-Conforama aims to develop a joint risk mapping, based on BUT's more advanced methodology, while also adapting it to Conforama's specific challenges.

### RISK ANALYSIS METHODOLOGY:

This approach was based on an initial diagnosis conducted in September 2021 with the support of an external consultancy firm. Nearly 40 interviews were conducted with Conforama's operational, management, and support process leaders, as well as representatives of external stakeholders, including NGOs, suppliers, non-financial rating agencies, and industry-specific initiatives.

The risk mapping and associated action plans were presented to and approved by the Conforama Executive Committee.

The methodology used to develop the risk mapping was based on the following steps:

1. Description of risk scenarios
2. Initial (raw) assessment of risk scenarios
3. Identification and evaluation of risk mitigation measures
4. Final (net) assessment and prioritisation of risk scenarios
5. Decision-making and risk management oversight

The initial (raw) risk assessment was conducted using a four-level scale, evaluating each risk scenario based on the following criteria:

- L'enjeu du risque est évalué à l'aide d'une combinaison de critères :
  - Country risk: Sustainable Development Goals (SDG) Index;
  - Stakeholder expectations: assessed through interviews and cross-referenced with key industry standards, such as the Sustainability Accounting Standards Board (SASB) and the Global Reporting Initiative (GRI);
  - Business impact of the operation in question: regulatory: Regulatory: potential legal sanctions and market loss; Reputation&Image: Visibility to external parties; Operational: business continuity and efficiency.

Development of the Risk Analysis Framework:

RISKS ANALYSED:

<div>HUMAN RIGHTS-RELATED RISKS</div>	<ul style="list-style-type: none"> <li>• Diversity</li> <li>• Inclusion of people with disabilities</li> <li>• Talent attraction and retention</li> <li>• Skills development and management</li> <li>• Social climate management</li> <li>• Respect for fundamental human rights and freedoms in the supply chain (discrimination and equal treatment, forced and illegal labour, child labour, freedom of expression and association)</li> <li>• Combating food insecurity</li> <li>• Links between the state and the military</li> </ul>
<div>HEALTH AND SAFETY RELATED RISKS</div>	<ul style="list-style-type: none"> <li>• Employee health, safety, and well-being at work</li> <li>• Customer safety</li> <li>• Promotion of physical activity and sports</li> </ul>
<div>ENVIRONMENTAL-RELATED RISKS</div>	<ul style="list-style-type: none"> <li>• Environmental compliance in the supply chain (emissions, pollution, etc.)</li> <li>• Sustainable resource management in the supply chain (wood, cotton, etc.)</li> <li>• Optimisation of upstream and downstream logistics (climate change mitigation)</li> <li>• Adaptation to climate change</li> <li>• Energy efficiency of buildings (climate change mitigation)</li> <li>• Waste management</li> <li>• Product reparability</li> <li>• Product recyclability</li> <li>• Combating food waste</li> <li>• Respect for animal welfare</li> <li>• Responsible, fair, and sustainable food sourcing</li> </ul>
<div>COMPLIANCE-RELATED RISKS</div>	<ul style="list-style-type: none"> <li>• Protection of employees' and customers' personal data</li> <li>• Combating corruption</li> </ul>

Risk assessment:

To assess the management of each risk, all control measures that can effectively prevent or mitigate its occurrence or impact were taken into account. A global rating (from 1 to 4) was assigned to evaluate the effectiveness of the risk management system.

The prioritisation of risk scenarios was determined by combining the initial level of exposure with the assessed level of risk mitigation.



## 2.3 Risk analysis & prioritisation

Risk prioritisation helps identify high-level risks and determine the necessary actions and efforts to prevent and manage them effectively.

Our risk mapping and prioritisation methods aim to be as comprehensive as possible in covering all identified risk (see risks outlined in each mapping) and the activities/products analysed. We are committed to a continuous improvement process, regularly updating our risk mappings to ensure that emerging risks are not overlooked.

### 2.3.1 BUT risk prioritisation

Overall, this analysis highlights that BUT's activities primarily impact the consumption of natural resources required for product manufacturing. This key issue has led to the development of environmental protection policies, such as our Wood Policy and the eco-design project.

In the procurement risk analysis, priority categories were identified by combining CSR risks with the allocated procurement budget:

- Wood and wood-based panel supplies were identified as particularly high-risk. In response, BUT implemented a wood policy in 2018, which was updated jointly with Conforama in 2024 (see section 4 on the Wood Policy). This policy is subject to a continuous improvement process.

- Other high-risk categories include plastic, synthetic materials, leather, and plant-based materials (such as cotton, palm oil, coconut fibre, and linen).

Regarding internal risk analysis, the results highlight health and safety risks as the top priority, particularly concerning employees and customers.

Regarding Marketplace risk analysis, the main concerns identified are insufficient management of environmental risks (such as sustainable forest management) and social risks (such as forced labour and child labour) related to products listed by third-party sellers.

It is important to note that this prioritisation method does not exclude any risks or categories from the scope of the due diligence framework.



### 2.3.2 Conforama risk prioritisation

At Conforama, risk prioritisation was carried out by risk sub-category, with a significant portion of identified risks being given priority.

- Human rights-related risks:
  - Diversity
  - Inclusion of people with disabilities
  - Talent attraction and retention
  - Skills development and management
  - Social climate management
  - Respect for fundamental human rights and freedoms in the supply chain (discrimination and equal treatment, forced and illegal labour, child labour, freedom of expression and association)
- Health and safety-related risks:
  - Employee health, safety, and well-being at work
  - Customer safety
- Environmental-related risks:
  - Environmental compliance in the supply chain (emissions, pollution, etc.)
  - Sustainable resource management in the supply chain (wood, cotton, etc.)
  - Optimisation of upstream and downstream logistics (climate change mitigation)
  - Adaptation to climate change
  - Energy efficiency of buildings (climate change mitigation)
  - Waste management

- Product reparability
- Product recyclability

- Compliance-related risks:
  - Protection of employees' and customers' personal data
  - Anti-corruption measures







**REGULAR EVALUATION  
PROCEDURES, RISK  
MITIGATION MEASURES  
& PREVENTION OF  
SERIOUS HARM**



## 3.1 General reference frameworks

BUT-Conforama reaffirms its commitment to identifying and reducing any risks related to poor working conditions for both its employees and external collaborators.

### 3.1.1 BUT-Conforama joint policy – CSR Charter: A framework for External Stakeholders

BUT-Conforama expects its manufacturers and suppliers to commit to a responsible approach as well. To this end, the Group has incorporated its CSR Charter as an annex to all supplier contracts, which they are required to sign.

This charter commits suppliers to respecting:

- international regulations set by the United Nations, including the Principles of the UN Global Compact,
- the principles of the Universal Declaration of Human Rights,
- the fundamental conventions of the International Labour Organization (ILO),
- the OECD Guidelines for Multinational Enterprises.

The CSR Charter covers the following topics:

- anti-corruption measures
- respect for working conditions, including fundamental labour rights as defined by the ILO and the principles of the UN Global Compact
- environmental protection
- compliance with hygiene and public health regulations

The charter also grants both brands the right to conduct audits to assess suppliers from a social and environmental perspective (for more details on social audits, see section b. Risk prevention in human rights, fundamental freedoms, health, and safety).

BUT

100%  
OF BUT's SUPPLIERS HAVE  
SIGNED THE CSR CHARTER

### 3.1.2 BUT – Business and due diligence code of conduct: A framework for internal and external stakeholders

In accordance with the French “Sapin II” Law, a Code of Conduct and Due Diligence has been distributed to all employees and suppliers. It is annexed to the internal regulations, available on the company’s intranet, and displayed in the offices of each store.

The Ethics Committee is responsible for ensuring compliance with these principles, which include:

- Respect for individuals: diversity, equal opportunities for all, anti-discrimination measures, protection against harassment, health and safety of employees and customers, prohibition of undeclared or forced labour, and protection of personal data;
- Protection of company assets;
- Compliance with trade regulations;
- Corporate social and environmental responsibility, with reporting based on three pillars: environmental, economic, and social;
- Social dialogue.

A mandatory e-learning training programme was introduced in 2019 to raise awareness among all employees about compliance with this Code of Conduct.

### 3.1.3 Conforama – Code of conduct: A framework for external stakeholders

Conforama’s Code of Conduct was sent to all suppliers for signature and serves as the reference document for managing social and environmental impacts throughout the supply chain. It is based on compliance with international conventions.

97% of active suppliers signed Conforama’s Code of Conduct during the reference period, compared to 99% in the previous period.

### 3.2 Risk mitigation measures & prevention of environmental risks and serious harm

BUT-Conforama has made reducing its environmental impact and improving environmental performance key strategic priorities.

At BUT, the "Better Production" pillar of its CSR strategy outlines the brand's commitments, actions, and initiatives aimed at mitigating and preventing associated risks.

At Conforama, environmental risks have been identified as particularly significant, with the majority of related topics being prioritised (see risk prioritisation section)..

Many joint initiatives already exist between BUT and Conforama, and this collaboration will continue to grow in the coming years, as both brands share closely linked challenges and activities. The Group aims to take the time to harmonise processes in order to better understand and adopt best practices from each brand.

In 2025, the Group will begin its compliance process with the CSRD (Corporate Sustainability Reporting Directive) and update its human rights and environmental risk mapping, allowing for a clearer definition of its upcoming shared roadmap.

#### 3.2.1 Joint BUT- Conforama actions

##### CLIMATE CHANGE RISKS // REDUCTION OF GREENHOUSE GAS EMISSIONS

A joint carbon footprint assessment is currently underway and is expected to be finalised in 2025.

The Group intends to use the same methodology as the one applied for BUT's carbon footprint assessment (see section 3.2.2. BUT-Specific Actions > Climate Change Risks // Reduction of Greenhouse Gas Emissions), while also implementing a more precise B2B transport data collection tool to improve the reliability of the data.

Additionally, the Group will launch a mobility study in 2025, the findings of which will be incorporated into this assessment..

##### [PROCUREMENT] ECO-DESIGN: MINIMISING RESOURCE USE

The risk related to the consumption of renewable and non-renewable resources has been identified as a major concern in both BUT and Conforama's risk mappings ("Sustainable resource management in the supply chain (wood, cotton, etc.)"). As a result, both brands are dedicating significant efforts to addressing this issue.

At the end of 2021, BUT developed a comprehensive eco-design approach in collaboration with the THINK+ expert agency. This approach was also critically reviewed by the Pôle Éco-conception, the national reference centre for eco-design in France.

A roadmap was created to outline the key actions required to meet the company’s 2026 objectives, which include:

- Developing an eco-design strategy aligned with the key environmental impacts of products
- Training 100% of buyers in the eco-design approach
- Ensuring 100% of exclusive brand products are eco-designed – this last objective has since evolved (see 2025 section).

This strategy also defines the key focus areas that BUT aims to implement to reduce product impacts:

- Ensuring traceability and transparency across value chains
- Reducing the use of non-renewable materials
- Using recycled materials
- Incorporating eco-certified materials
- Maximising product lifespan and reparability
- Maximising the recyclability of materials used in products and packaging
- Prioritising manufacturers with an energy mix containing less than 50% coal.

OCT. 2021 TO MARCH 2022	MARCH TO APRIL 2022	MAY TO JULY 2022	JULY TO SEPTEMBER 2022	SEPT. 2022 TO MARCH 2023
ELABORATION OF THE ECO-DESIGN POLICY:: analysis of internal and external issues, conducting Life Cycle Analyses (LCA) on a sample of five representative products from the furniture range and product categories addressed by the French Environment and Energy Management Agency (ADEME) standards.	TEST PHASE OF THE PRODUCT EVALUATION TOOL IN THREE AREAS: home appliances, decoration, and furniture, adapting the strategy to address associated risks, adapting the evaluation tool to each product category.	TRAINING ON THE ECO-DESIGN POLICY: and the evaluation tool for purchasing and product teams, designers, and sourcing. BUT is also gradually rolling out training for its suppliers.	DEVELOPMENT OF THE FIRST ECO-DESIGNED PRODUCTS: from the eco-design policy, based on the specifications and dedicated instructions provided by the buyers responsible for exclusive brands.	STRUCTURING ENVIRONMENTAL COMMUNICATION and displaying the Habitons mieux (“Let’s live better”) rating in stores and on but.fr. Additionally, the relevant employees, particularly the buyers, are trained on the eco-design policy, the strategy, and the operation of the Habitons mieux framework so that it can be used as a decision-making and product selection tool.



Additionally, a set of specific criteria has been defined for each product category:

- **Household appliances:** Limit water and energy consumption during use and extend product lifespan;
- **Decoration:** Strengthen the traceability of raw materials, particularly for textiles and dyes, and prioritise recycled materials;
- **Furniture:** Enhance the traceability of wood and work on reducing its environmental impact in line with the wood policy (see below).

BUT has developed a product assessment tool to analyse the level of eco-design throughout the entire product lifecycle. This tool assigns a rating to validate whether a product is eco-designed: a product will be considered eco-designed if it receives a grade of A or B. All existing products in the range are currently being evaluated, and every new product undergoes this assessment.

The eco-design project complements several actions already implemented by BUT, particularly in sourcing certified or recycled materials. Where relevant, priority is given to OEKO-TEX-certified textiles and FSC- or PEFC-certified wood.

In 2024, we expanded this work through several simultaneous initiatives:

- **Communication:** internal and customer communication campaigns were launched, with product scores displayed on the website (for all BUT-branded products) and in stores (for products

rated A and B);

- **Business case studies:** conducted on 10 key products to identify how to improve the score of items rated C or D.

- **Specification development:** based on a co-construction process with suppliers, including joint BUT-Conforama committees bringing together buyers from both brands, key suppliers, and BUT's eco-design engineer for each product category. The objectives of these sessions were to :

- Engage the entire supply chain in a unified approach
- Share our vision and ambitions with suppliers
- Present best practices and eco-design strategies
- Discuss industrial and economic feasibility, as well as future projections.

A first version of product-category-specific specifications was developed, outlining our minimum eco-design requirements and the expected industrial progress milestones leading up to 2030. This version was shared with suppliers attending the sessions and refined based on their feedback to align with industrial constraints.

The finalised specifications were completed in summer 2024 and will be integrated into supplier contracts from March 2025, requiring formal supplier agreement and signature.

To date, at BUT:

- 100% of buyers have been trained
- 100% of private label (MDD) suppliers have been trained (a large proportion of whom are shared with Conforama)
- Product assessment: 37% of products have been rated, with 17% classified as eco-designed
- **2024 target achieved** : 75% of private label (MDD) products have been rated

From 2025 onwards, the Group has chosen to adjust its eco-design targets for private label (MDD) products, as these represent only 20% of total volumes. The new objectives now focus on G1000 products—the core product range available in all stores, which accounts for 60% of sales volume:

**2026** : 30% of sales volume to be eco-designed

**2028** : 60% of sales volume to be eco-designed, with at least 20% rated A

**2030** : 100% of sales volume to be eco-designed, with at least 20% rated A

In 2025, the Group also aims to:

- Roll out the eco-design strategy at Conforama;
- Set specific targets for buyers to help achieve the Group's new objectives.

## [PROCUREMENT] OPTIMISING PACKAGING THROUGH OUR PACKAGING POLICY

The risks associated with plastic and cardboard have been identified as high-risk in both BUT and Conforama's procurement risk mappings under categories such as "Environmental compliance in the supply chain (emissions, pollution, etc.)" and "Waste management".

These risks are partially addressed through a joint packaging policy implemented by BUT and Conforama.

Due to the nature of the products sold and the high sales volumes, our activities generate a significant amount of packaging waste throughout the value chain, from procurement and logistics to retail. For example, in 2023, around 14% (by weight) of our packaging components for household products were made of plastic.

This leads to various environmental impacts, such as: resource consumption during production, use of chemical substances in manufacturing (especially plastics), and waste generation at the end of the product lifecycle.

In this context, BUT introduced its first packaging policy in 2018, covering all stages of the packaging lifecycle, from procurement to the customer's home.

The guiding principles of this policy aim to:

- define fundamental requirements for all commercial products as a prerequisite for business deployment;
- share requirements, ambitions, and objectives with suppliers;
- communicate internally and monitor compliance.

More recently, during the 2023 update of the packaging policy, BUT and Conforama France joined efforts within a circular economy approach to set quantifiable targets aligned with regulatory requirements (AGEC anti-waste law, EUDR) and to establish operational monitoring indicators. To achieve this, the policy was built upon the five key requirements outlined in the 2018 policy:

- optimisation of packaging to minimise the number of components used and improve the efficiency of upstream and downstream supply chains;
- product protection;
- compliance with current regulations;
- environmental protection, including the use of renewable materials (promoting FSC- or PEFC-certified paper/cardboard), the design of easily separable packaging to facilitate sorting and the promotion of proper waste sorting practices among customers;

- packaging functionality to support efficient parcel handling and provide clear product information (compliance, visibility, readability).

This policy aims to meet AGECE anti-waste law obligations and to serve as a foundation for research conducted within the RESET PACKAGING consortium, which includes seven other furniture industry players (manufacturers and retailers) in France, working to identify plastic-free packaging alternatives.

### [PROCUREMENT] WOOD POLICY: ADDRESSING CRITICAL RAW MATERIALS

This risk has also been identified as major in the risk mappings, which is why BUT and Conforama aim to implement an ambitious wood policy.

Wood is a crucial natural resource for the company. In 2024, BUT's wood procurement amounted to over €690 million, representing around 50% of the company's total purchases. Wood is a key material in the product offerings of both brands, particularly in furniture, which accounts for 63% of BUT's revenue and approximately 50% of Conforama's.

As a result, BUT made a long-term commitment to responsible wood sourcing by introducing its wood policy in 2018. This policy was updated in 2024 to become a joint BUT-Conforama policy.

The BUT-Conforama wood policy is built around six key pillars, which define the principles of responsible sourcing:

- Compliance with legal requirements, land tenure regulations, and land use rights
- Respectful relationships with local and community-based populations
- Respect for workers' rights
- Preservation of water resources and soil quality
- Protection of ecosystems and biodiversity
- Reduction of greenhouse gas emissions

BUT-Conforama also places strong emphasis on wood traceability, ensuring transparency, collaboration, and supplier engagement.

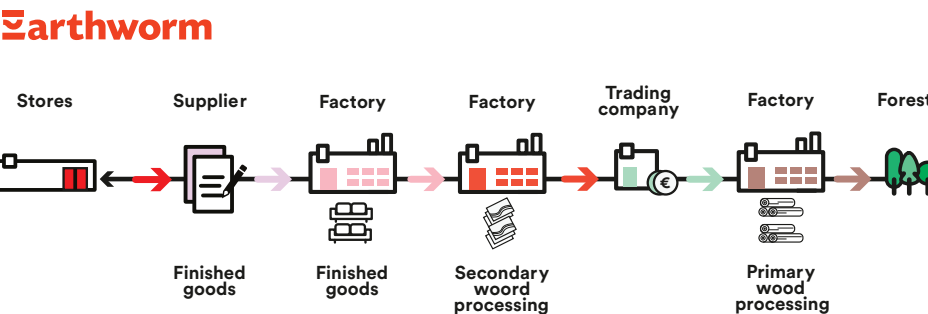
The supply chains of factories are traced, and the actual commitment of each supplier is assessed. This process is conducted annually, so that traceability is verified every year. The traceability process follows three key steps:

- 1. Collecting information on value chains:** identifying the different links in the supply chain and gathering supporting documentation
- 2. Risk assessment:** using a supplier risk evaluation matrix based on the analysis of traceability reports

- 3. Implementing risk mitigation action plans:** ensuring compliance with the BUT-Conforama wood policy through measures such as additional document collection or conducting audits, when necessary, by Earthworm Foundation (approximately 10 audits per year)

BUT-Conforama collaborates with Earthworm Foundation to validate the responsible nature of its wood and wood-derived sourcing. Earthworm Foundation is an international non-profit organisation that supports companies in adopting more responsible procurement practices.

**Supply chain traceability**  
The example of wood



This partnership provides an impartial expert perspective on the analysis and evaluation of BUT-Conforama’s wood supply chains. Earthworm Foundation conducts on-site audits, the results of which are reviewed during regular follow-up meetings. Decisions regarding further actions are made collectively.



BUT-Conforama has set the following objectives:

- 2026 : 100% of high-risk suppliers will be audited** to ensure that their practices do not contribute to deforestation or forest degradation, in compliance with EUDR regulations;
- 2028 : BUT and Conforama will provide clear and precise information** in stores and on digital platforms **regarding the origin of the main wood species used in their products**, as well as their certifications;
- 2030 : 100% of wood and wood-derived materials will come from responsible sources.** This 2030 target was initially set for 2024 but was revised after aligning BUT and Conforama's wood policies. The Group decided to strengthen its criteria for defining wood as "from responsible sources" by incorporating geolocation data of the original forest plots. Since collecting this data has proven complex in Asia, the Group chose to postpone the target to ensure a precise and thorough approach. The introduction of EUDR regulations (European legislation aimed at combating deforestation and forest degradation) has further reinforced the criteria for validating responsible wood sourcing. Since 2024, BUT and Conforama have required suppliers to provide geolocation data for the forests where the wood used in their products originates.

Currently, 78.9% of the wood used comes from Europe, with most of the remaining portion also sourced from Asia.

In 2023, 100% of the relevant BUT suppliers had committed to complying with the wood policy by signing it. The new wood policy was finalised at the end of 2024. As a result, the updated version will be attached to contracts in 2025 and will be signed by all BUT and Conforama suppliers concerned.

The policy applies to all products sourced through BUT and Conforama's central purchasing units, sold in company-operated stores as well as in franchised stores of the brand. BUT-Conforama employees are made aware of this policy during internal conventions, where its objectives and implementation progress are presented.



### PROMOTING THE REUSE AND REPURPOSING OF END-OF-LIFE PRODUCTS

To address the major risk of natural resource consumption identified in the procurement risk mapping, BUT and Conforama collaborate with various eco-organisations, such as Ecosystem, to collect and process end-of-life electrical and electronic equipment returned by customers. These waste items are either recovered in treatment centres or sent to Envie and Emmaüs, social and solidarity organisations that give them a second life.

In 2022, BUT also established a Reuse & Repurposing Fund, managed by Ecosystem, to facilitate the collection of electronic devices, screens, and large household appliances (both refrigeration and non-refrigeration units). A new specification framework has now been introduced, setting reuse and repurposing targets (2% of all products placed on the market by 2027) and improving traceability of repurposed devices.

At Conforama, a circular economy policy has been implemented, covering:

- Service offerings to extend product lifespan, including donations, resale, and repairs;
- Incorporation of secondary raw materials in product manufacturing and improvement of recyclability, through upstream recyclability criteria and end-of-life product collection.

In 2024, BUT-Conforama launched several partnerships to enhance the circular economy of its products:

- Strengthening its partnership with Ecosystem to improve traceability and increase the volume of products processed by the eco-organisation;
- Introducing furniture take-back during deliveries: transporters are now required to offer customers the option of returning their old furniture for recycling. Under the AGECE (Anti-Waste for a Circular Economy) law, BUT-Conforama is required to provide free collection of used products from customers. This means that stores must accept and collect old items free of charge, as long as they are of the same type and quantity as those purchased or replaced. When a customer opts for this service, BUT and Conforama must ensure that transporters retrieve the old item upon delivering the new one;
- Promoting reuse and reducing waste: BUT and Conforama have partnered with Geev, a donation app that enables customers to give away their old products. They have also worked with the eco-organisation Ecomaison to promote solidarity-based reuse. In total, around 50 sites across both brands have been equipped with shipping containers to store old customer products before they are donated to local charities.

### 3.2.2 Actions spécifiques BUT

#### CLIMATE CHANGE RISKS // REDUCTION OF GREENHOUSE GAS EMISSIONS

During 2022-2023, BUT conducted its first carbon footprint assessment to accurately identify the main sources of greenhouse gas emissions.

This assessment covers the nature of its distribution activities, including procurement, transport, operations, product end-of-life, travel, fixed assets, and both energy and non-energy consumption. It covers the entire scope of the company, including headquarters, integrated and franchised stores, logistics platforms, and the sourcing office, across Scopes 1, 2, and 3.

The project was carried out in several stages:

- 1 | Carbon awareness training for the Executive Committee and the creation of a carbon committee composed of various experts;
- 2 | Data collection, including mapping of material flows and conducting multiple interviews;
- 3 | Data analysis, processing, and consolidation;
- 4 | Development of action plans through workshops involving various stakeholders;
- 5 | Preparation of the Carbon Footprint Report.

Based on 2022 data, BUT's overall activities generated 2,400 ktCO<sub>2</sub>eq, equivalent to 1 kgCO<sub>2</sub>eq per euro of revenue.

Scope 3—which measures indirect emissions from upstream activities (such as procurement and freight) and downstream activities (including freight, product use, and end-of-life processing)—accounts for 99% of the total carbon footprint. Three key areas alone represent 92% of total emissions:

- Procurement (mainly products and packaging) is the largest emissions source, contributing 1,566 ktCO<sub>2</sub>eq, nearly 65% of the total carbon footprint;
- End-of-life product disposal (including products, packaging, transportation, and energy used in waste treatment) accounts for 352 ktCO<sub>2</sub>eq;
- Product usage (including packaging and electricity consumption) ranks third, with 290 ktCO<sub>2</sub>eq.

Among the product categories with the highest carbon footprint, large household appliances, refrigeration equipment, and bedding stand out.



## FORMALISING OUR AMBITION: OUR LOW-CARBON PATHWAY

To align BUT's emissions pathway with the Paris Agreement, the company targets a reduction of 18% by 2026 and 42% in absolute emissions by 2030, representing an annual reduction of 6% between 2022 and 2030.

Several actions have been implemented:

- Eco-design, which represents the largest impact on carbon emissions: BUT prioritises action in this area (see dedicated section);
- Refining emission factor calculations for the most strategically sold categories, including mattresses, chests of drawers, kitchen units, bookcases, and bed bases. For example, instead of calculating emissions based on a generic "mattress" category, calculations will now distinguish between "foam mattresses" and "spring mattresses";
- Extending product lifespan;
- Developing multichannel transport;
- Raising consumer awareness and providing training and engagement opportunities for employees;
- Engaging suppliers in the carbon reduction strategy by training them in eco-design and encouraging them to measure their carbon footprint using the SBTi (Science Based Targets initiative) approach.

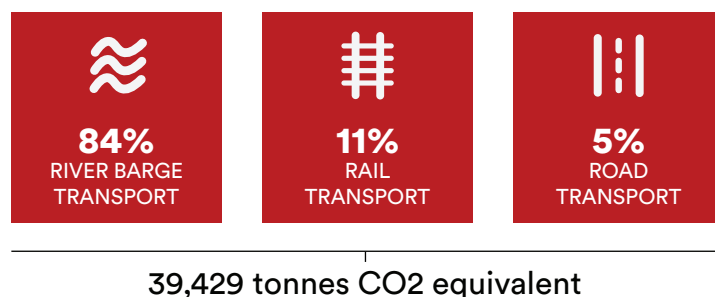
Each year, the company's carbon footprint assessment is revised to improve data reliability and track the reduction of its carbon footprint. In 2025, BUT aims to further strengthen data reliability within the identified strategic scope (see bullet point 2 above).

Regarding energy consumption, an energy efficiency plan has been implemented as part of a policy to reduce emissions in Scopes 1 and 2, contributing to the overall reduction of the carbon footprint.

### 3.2.2 Conforama-specific actions

#### MITIGATION AND ADAPTATION TO CLIMATE CHANGE // OPTIMISATION OF UPSTREAM AND DOWNSTREAM LOGISTICS

At Conforama, logistics is distributed as follows:



Conforama has developed a policy to limit the carbon impact of logistics. This policy aims to improve data quality and completeness, define a decarbonisation pathway, optimise transport plans to reduce the number of kilometres travelled, prioritise service providers committed to CO2 reduction initiatives, and improve truck load rates without compromising working conditions for goods reception.

In 2023, to implement this policy, Conforama focused on green mobility by phasing out diesel company cars, continuing the renewal of service technicians' utility vehicles with newer diesel models, and replacing part of the fleet with petrol vehicles.

Conforama also seeks to significantly reduce its energy consumption and has launched a multi-year energy management plan focused on:

- Decarbonising equipment;
- Controlling energy consumption and ensuring compliance with heating, lighting, and air conditioning guidelines;
- Sharing best practices.

To achieve this, Conforama continues to train store managers alongside consultancy firm Greenflex and replaces equipment during on-site renovation projects.

In 2024, Conforama consumed 59.58 GWh of electricity and 27.25 GWh of gas, representing a reduction of 16% in electricity consumption, 6% in gas consumption, and an overall decrease of 13% compared to 2023.

**2030 target:** achieve compliance with the Décret Tertiaire (French regulation on energy consumption in the services sector) by reducing energy consumption by 40%.

Regarding climate change adaptation, Conforama aims to develop a site mapping system to identify locations exposed to natural disasters and implement dedicated prevention measures where necessary.

### 3.3 Risk mitigation measures & prevention of risks and serious harm to human rights, health, and safety

#### 3.3.1 BUT-specific actions

Ensuring the health and safety of both employees and customers in stores is a key priority for BUT..

#### [INTERNAL] HEALTH AND SAFETY RISKS FOR EMPLOYEES: ENSURING A SAFE WORK ENVIRONMENT

A dedicated team is responsible for implementing and monitoring risk prevention measures. These measures are communicated through specific training sessions, on-site awareness campaigns, and a dedicated newsletter.

Additionally, the mandatory training programme for all new BUT employees includes a module on workplace health and safety.

Each year, logistics platforms, headquarters, and all 211 integrated stores complete a Single Occupational Risk Assessment Document (DUERP in French), which outlines the health and safety risk assessment results for employees. A dedicated team ensures compliance with these documents.

Among the main risks identified, two key categories stand out:

- Physical risks: repetitive movements, static work, strain, extreme joint positions, heavy lifting...;
- Psychosocial risks: time pressure, direct customer interactions, repetitive tasks, harassment, discrimination...

To address these risks, Personal Protective Equipment (PPE) and Collective Protective Equipment (CPE), as well as heavy-handling assistance tools, have been implemented. Pilot projects are also being carried out to reduce the risk of Musculoskeletal Disorders (MSDs), such as pre-shift warm-up sessions. A digital reporting tool, Symalean, was introduced in 2020, allowing site managers to report workplace accidents, incidents, and near-misses.

Accident reports are also shared with Human Resources, the Social and Economic Committee (SEC), and trade unions. While franchised stores are not yet included in BUT's accident tracking, best practices are shared with them, and BUT aims to fully integrate them into the process in the medium term.





An internal control system has been implemented to ensure proper compliance with safety regulations across BUT sites :

- LEVEL 1:** monthly site inspections conducted by Security Department managers, store managers, or warehouse managers ;
- LEVEL 2:** a four-month extended inspection campaign covering over 200 company-operated BUT sites, with each site audited annually by external service providers;
- LEVEL 3:** a counter-audit is performed on a sample of sites to verify compliance and the quality of the initial inspections.

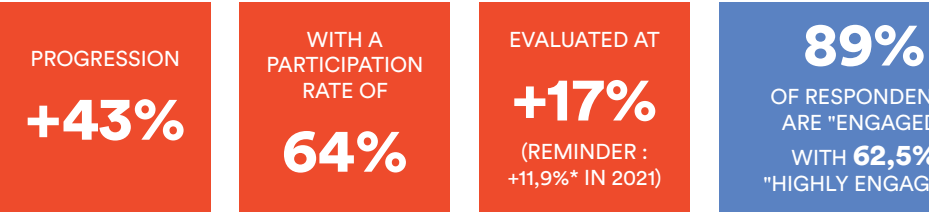
This system applies to all integrated stores, which undergo annual audits by an external inspector. In cases of non-compliance, a corrective action plan is established with a specific implementation deadline.

In 2024, BUT adopted best practices from Conforama and introduced a warm-up video programme to help reduce musculoskeletal disorders. Four different videos have been created, and all warehouse employees are required to watch them. A regional coordinator is responsible for overseeing the programme's proper implementation.

[INTERNAL] PSYCHOSOCIAL RISKS: ENSURING EMPLOYEE WELL-BEING AND SUPPORT

As part of a continuous improvement approach, an "Employee's Voice" survey is conducted regularly to assess employee well-being at work..

According to the 2023 survey, the Employee Net Promoter Score (eNPS) has improved compared to the previous survey:



\*scores can range from -100 to +100

The score is calculated based on responses to the question: "Would you recommend your company to a close friend or family member looking for a job?".

## [INTERNAL] CROSS-CUTTING ACTIONS FOR RISK MITIGATION AND PREVENTION OF SERIOUS VIOLATIONS OF HUMAN RIGHTS, HEALTH, AND SAFETY WITHIN COMPANY SITES

BUT has established its own training campus, offering more than 300 e-learning modules, including safety courses and job-specific training. Some of these courses are mandatory for all employees, covering:

- Business and Due Diligence Code of Conduct;
- GDPR (General Data Protection Regulation);
- Prevention of sexism and sexual harassment;
- Cybersecurity;
- Health and safety;
- Human risks;
- Fire safety: prevention measures, fire suppression methods, and evacuation procedures.

## HEALTH AND SAFETY RISKS FOR CUSTOMERS: PRODUCT SAFETY

BUT pays particular attention to the composition of its products to ensure the safety of its customers. To achieve this, BUT has implemented control plans developed in collaboration with expert laboratories. These control plans include: a summary of regulatory and normative requirements, a risk analysis, ad hoc control procedures, and a study of customer complaints to assess potential issues and verify product compliance.

For example, analyses carried out include but are not limited to:

- on all products: chemical composition analyses to verify their safety in accordance with REACH regulations;
- on furniture: stability and mechanical strength analyses;
- on electrical products: electrical safety and electromagnetic compatibility analyses.

Whenever possible and relevant, we prioritise products carrying a quality certification, such as the OEKO-TEX Standard 100 certification for our textile items.

In the event of a quality issue despite the control measures in place, a Quality Incident Management Procedure ensures the efficient and rapid handling of product withdrawals and recalls. This procedure aims to minimise customer exposure to such risks. It complies with current regulations and the recommendations of the French National Consumer Council (CNC) issued on July 13, 2018.



[PROCUREMENT] RISKS RELATED TO WORKING CONDITIONS IN THE SUPPLY CHAIN

Prevention and risk mitigation measures related to working conditions currently apply exclusively to private label products.

BUT's supplier network mainly consists of Asian factories managed by its sourcing office in China (working with 288 factories in Asia) as well as manufacturers in Europe, Turkey, and Brazil.

BUT is aware of the social risks that may arise within its supply chain. For this reason, social audits have been conducted for several years, and since 2022, the company has adhered to the ICS (Initiative for Compliance and Sustainability) framework. Since then, social and environmental audits have been carried out in compliance with ICS criteria, which are based on the principles of the International Labour Organization (ILO). These audits are conducted by audit firms selected by ICS and mandated by BUT, rather than by the suppliers themselves. Moreover, suppliers are not informed in advance of the audit date.

All results are shared within the ICS database, allowing all members to access data on the factories they have in common. BUT also accepts BSCI audits, provided that the factory was not informed of the audit date in advance.

The priority scope identified for these initial audits is Asia. An internal auditor from the sourcing office, working for both BUT and Conforama (210 shared factories, representing 70% of the total) directly liaises with the factories to streamline audits.

This auditor informs factories about the corrective action plans required following audits conducted by the Quality Department in France, monitors progress, and conducts on-site visits to assess improvements in social compliance.

For audit follow-up, the first step was to integrate all Asian suppliers into the ICS database through the sourcing office. Priority was given to factories that had never been audited or those whose last audit was over three years old.

The rating system used is dual-based, combining percentage scores with a grading scale from A to E, depending on the severity of detected non-conformities. Suppliers are then required to implement corrective measures. The factory undergoes a re-audit at least six months after the initial audit. If serious non-conformities are found or if the factory shows no improvement after three re-audits, it is delisted.

In 2024, 90% of BUT's private label (MDD) suppliers in Asia (Tier 1 factories) underwent a social audit.



[PROCUREMENT] ENVIRONMENTAL RISKS IN THE SUPPLY CHAIN

BUT also conducts environmental audits of its factories based on the ICS framework. Priority is given to auditing the most polluting sites, such as dyeing and leather tanning facilities.

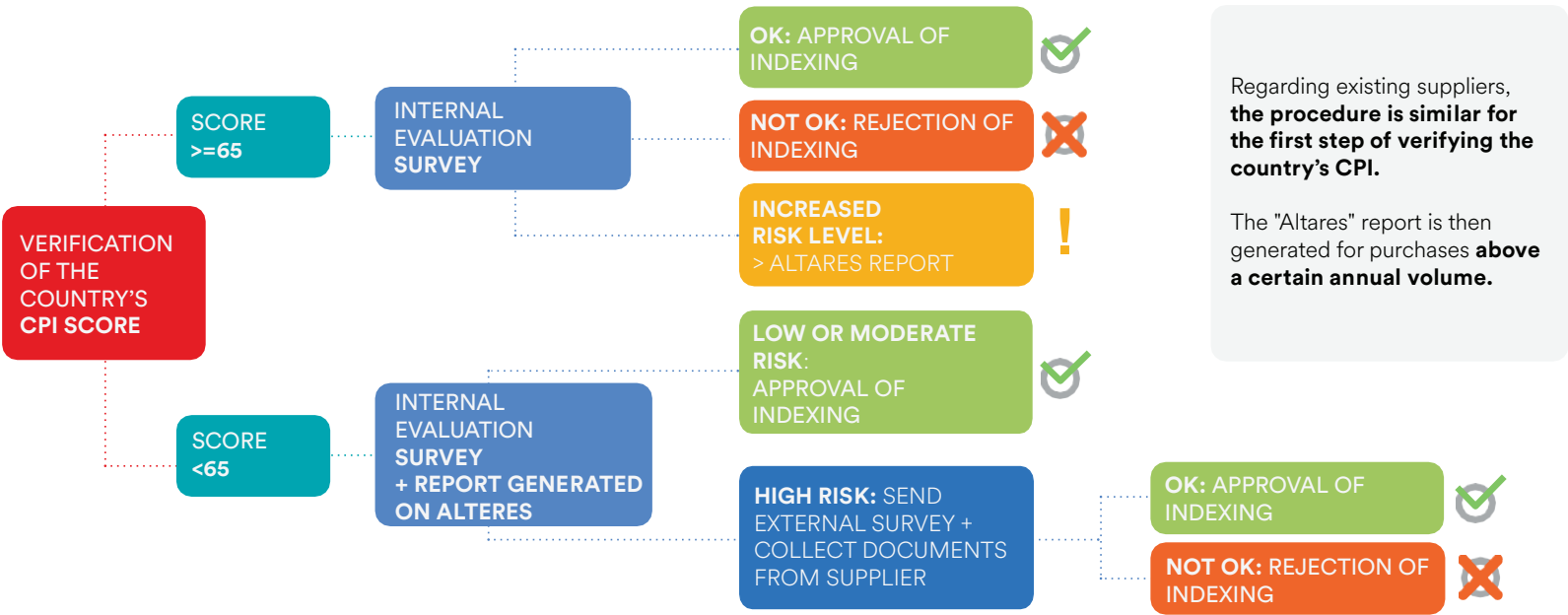
In 2024, BUT conducted environmental audits on 36% of its private label (MDD) suppliers (Tier 1, 2, and 3 factories) in Asia.

[PROCUREMENT – BUSINESS ETHICS RISKS IN THE SUPPLY CHAIN: COMBATING CORRUPTION]

BUT has implemented an anti-corruption policy based on the legal obligations of the French “Sapin II” law. As part of this framework, a specific supplier evaluation procedure has been introduced to assess corruption risks.

The corruption risk level of a supplier's country of origin is assessed using the Corruption Perceptions Index (CPI) from Transparency International.

The company also uses the "Altares" tool, a software solution that evaluates the overall risk level of suppliers based on various criteria.



Regarding existing suppliers, **the procedure is similar for the first step of verifying the country's CPI.**

The "Altares" report is then generated for purchases **above a certain annual volume.**

**100%**  
**OF OUR SUPPLIERS**  
considered "at risk"  
(based on country risk) are evaluated.



## [MARKETPLACE] RISK MITIGATION MEASURES AND PREVENTION OF SERIOUS HARM

As BUT acts as a “host” for third-party commercial partners, the company must balance vigilance with respect for seller independence.

To strengthen its due diligence approach and address risks specific to Marketplace, a dedicated risk prevention and mitigation strategy is planned. This strategy will allow for the progressive integration of commercial partners, encouraging them to improve the management of risks within their own supply chains.



3.3.2 Conforama-specific actions

[INTERNAL] TALENT MANAGEMENT

Conforama has implemented several initiatives to enhance its attractiveness as an employer and retain talent, focusing on three key areas:

- **Building** a strong candidate and employee experience;
- **Developing** a culture of feedback;
- **Simplifying and modernising** processes and tools.

The company has also developed a training-focused policy aimed at providing targeted training, adapting programmes to specific needs, and aligning skill frameworks accordingly.

[INTERNAL] EQUAL TREATMENT AND PROMOTION OF DIVERSITY

A policy for inclusion and job retention for people with disabilities has been developed around four key areas:

- Recruitment and integration;
- Employee support;
- Professional development for internal stakeholders;
- Communication and awareness initiatives.

This approach is complemented by a diversity promotion policy, focusing on eliminating pay gaps, hiring, career advancement, access to training, and work-life balance.

[INTERNAL] HEALTH AND SAFETY OF EMPLOYEES

Conforama has developed a workplace risk management policy, encouraging all employees to actively contribute to their own safety and the safety of others. It promotes a safe and welcoming work environment, equipped with efficient and secure tools, and an organisational structure that considers human factors.

To implement this policy, Conforama has revamped its onboarding booklet into an e-learning format, provided awareness videos on how to respond to verbal and physical aggression, and introduced two videos by a professional coach on warm-up exercises and stretching at the start of shifts to help prevent workplace injuries. This initiative has since been adopted by BUT as well.

In 2023:

- 3,578 employees were trained in safety practices;
- 330 workplace accidents resulted in leave.

**Objective :** gradually reduce frequency and severity rates by 10 to 15% per year compared to the previous year over the next five years.

## [INTERNAL] SOCIAL DIALOGUE

At Conforama, social dialogue takes place at both the national and local levels:

- At the national level, through a Central Social and Economic Committee (CSEC), various commissions, and representative trade unions;
- At the local level, through 12 Social and Economic Committees (SECs) covering stores organised by region, 1 SEC for headquarters and support functions, and 2 SEC for after-sales service operations at the Compiègne platform.



## [PROCUREMENT] ENVIRONMENTAL COMPLIANCE IN THE SUPPLY CHAIN

Based on its risk analysis, Conforama has identified Asia as the highest-risk area and has therefore implemented its most ambitious actions in this region.

The company has established a supplier audit policy to ensure environmental compliance:

- Signing of Conforama's Code of Conduct by suppliers;
- Annual environmental audits and re-audits conducted by an independent third party following the ICS framework, with results shared within ICS (priority given to wet process industries, textiles, and Asia);
- Whistleblowing system, procedures, and corrective action plans in case of non-compliance;
- Annual technical factory audits, which also include environmental compliance checks;
- A Conforama Business Code of Conduct for internal teams, including provisions on environmental responsibility.

In 2024, 52% of Conforama's suppliers' factories in Asia underwent an environmental audit.

## [PROCUREMENT] RESPECT FOR FUNDAMENTAL HUMAN RIGHTS AND FREEDOMS IN THE SUPPLY CHAIN

In line with its environmental audit policy and BUT's approach, Conforama has also implemented a supplier audit policy to ensure compliance with laws and standards related to human rights and fundamental freedoms. This approach follows the same structure as the environmental policy:

- Signing of Conforama's Code of Conduct by suppliers;
- Member of ICS (Initiative for Compliance and Sustainability) since 2003;
- Annual social audits and re-audits conducted by an independent third party following the ICS framework, with results shared within ICS (priority given to Asia and Brazil);
- Whistleblowing system, procedures, and corrective action plans in case of non-compliance;
- Annual technical factory audits, which also include social compliance and employee safety checks;
- A Conforama Business Code of Conduct for internal teams, including provisions on working conditions, freedoms, and fundamental rights;

In 2024, 100% of Conforama's private label (MDD) Tier 1 factories in Asia underwent a social audit.

## [PROCUREMENT] COMBATING CORRUPTION

Conforama has implemented an anti-corruption policy in compliance with the French "Sapin II" Law, which includes :

- a risk mapping framework;
- a code of conduct;
- a whistleblowing system;
- designated "whistleblowing referents";
- third-party evaluations;
- compliance checks;
- employee training.



## PROTECTION OF EMPLOYEES' AND CUSTOMERS' PERSONAL DATA

A personal data protection policy has been established and is managed by an internal Data Protection Officer (DPO).

## CUSTOMER SAFETY

Conforama has established a policy to ensure the quality and safety of the products it sells.

This strict policy is based on European and French regulations, rigorous testing campaigns, and a user feedback system. It includes:

- Product specifications incorporating Conforama’s requirements (compliance with European and/or French standards, REACH and EUTR regulations, etc.);
- Technical factory audits during supplier qualification;
- Quality controls throughout the product supply process;
- Quality teams working closely with suppliers;
- Testing upon reception in France and in-store sampling, conducted by two ISO 9001:2015-certified internal laboratories.





4.

## WHISTLEBLOWING & REPORTING SYSTEMS



## 4.1 BUT whistleblowing system

BUT has implemented a whistleblowing system that allows employees to report behaviours or situations that violate the principles outlined in the Code of Conduct, particularly those related to human rights and environmental issues.

This system and the reporting procedure are detailed in the Code of Conduct, which is accessible via the company's intranet. A mandatory e-learning module is also provided to all employees.

Employees who witness or experience a violation of the Code of Conduct are trained in how to use the whistleblowing system and can report concerns by sending an email to a dedicated email address.

The Ethics Committee, which includes the Head of Employee Relations and the Internal Audit Director, conducts the necessary verifications and investigations to handle reported cases. Confidentiality is ensured throughout the entire process, ensuring whistleblowers can report potential violations confidentially and without fear of retaliation.

An annual newsletter serves as a regular reminder of this system, reiterating the availability of the Code of Conduct on the intranet and the existence of the whistleblowing system. Additionally, the mandatory e-learning training on the “Business and Due Diligence Code of Conduct” also covers this reporting mechanism.

In the past year, one alert was raised through the system. The case was investigated, and appropriate actions were taken to resolve the issue.

## 4.2 Conforama whistleblowing system

Conforama has implemented a free ethics whistleblowing platform, available 24/7, developed by an external provider.

This highly secure platform (GDPR-compliant and ISO 27001-certified) ensures that neither the provider nor any third party can have access to the data stored in the system. Available in French and English, it allows for anonymous or named reports, guaranteeing the security of communications and the confidentiality of shared information. A dedicated whistleblowing unit has been established, composed of seven trained whistleblowing referents, each having undergone two days of training on handling alerts and conducting investigations.

A communication campaign was launched to inform employees, including posters and articles on the company intranet.

In 2024, 17 reports were filed:

- Moral harassment: 9
- Sexual harassment: 3
- Discrimination: 2
- Health and safety concerns: 1
- Other: 2

A man with a beard, wearing a red safety vest over a white shirt, is looking down at a handheld electronic device. He is standing in a warehouse or storage area, with cardboard boxes and shelving units visible in the background. A woman with short blonde hair is standing next to him, looking at the device. Another person with long dark hair is partially visible in the background. The scene is brightly lit, and the overall atmosphere is one of a busy, organized workspace.

5.

**MONITORING SYSTEM  
FOR IMPLEMENTED  
MEASURES &  
EVALUATION OF THEIR  
EFFECTIVENESS**



A dedicated governance structure has been established to oversee the internal implementation and monitoring of the Due Diligence Plan.

This includes creating a dedicated committee and appointing a Due Diligence Officer, responsible for ensuring the ongoing coordination of this initiative and tracking the Key Performance Indicators (KPIs).

The Due Diligence Plan may be modified in response to industry developments (particularly emerging risks), regulatory changes, and updates to associated action plans.

In addition to continuous monitoring, the Due Diligence Committee holds an annual review meeting before the plan is published.

A comprehensive reassessment of risk mapping is also planned for 2025, aiming to question its foundations and review its processes in depth.



