



**Corporate Social
Responsibility
(CSR) Report
2022
Flex-N-Gate Europe**



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FLEX|N|GATE

Flex-N-Gate Europe

In Europe, the manufacturing sites of Flex-N-Gate are located in France, Spain, Germany and UK.

Flex-N-Gate France was created in 2017, when the American company Flex-N-Gate bought out AEE.

There are 4 factories in France, specialized in injecting and molding plastics components (mainly to produce the cars' bumpers) : Audincourt (headquarters), Burnhaupt, Marines and Marles-les-Mines. Our last site, Maubeuge, is a sequencing plant integrated in one of our clients' factory.

In Spain, there are 6 Flex-N-Gate plants that historically belonged to the group. They are grouped in a single juridical entity called Tubsas Automoción, S.L : Tubsas Automoción, Flex-N-Gate España, DAFE, Flex-N-Gate Plásticos, Flex-N-Gate Aragón and Flex-N-Gate Navarra. Except for Flex-N-Gate Plásticos which is specialized in plastic injection molding, these sites produce lightings and metal components. A seventh plant, different from the Tubsas Automoción juridical entity is located in Valladolid and produces plastic components for automotive exteriors.

There are 2 factories in the south of Germany. Ingolstadt is specialized in injecting molding and module assembly. In Offeneau are build the front-end-modules for three different types for the customers. Both plants deliver the parts just-in-sequence to the customer.

Supply chain

Controlling the impact of suppliers
Business Ethics

France Perimeter

246 Production suppliers (117M€)
98% in Europe / 69% in France

59 Molds & Equipments suppliers (69M€)
92% in Europe / 48% in France

401 indirect suppliers (41M€)
100% in Europe / 100% in France

Spain Perimeter

106 Production suppliers (85M€)
Plastics, paints, metal, chromes, mechatronics
99% in Europe / 69% in Spain

32 Molds & Equipments suppliers (12M€)
77% in Europe / 50% in Spain

35 indirect suppliers (12,5M€)
100% in Europe / 95% in Spain

Germany Perimeter

45 Production suppliers non mandated (12M€)
99% in Europe / 86% in Germany

96 Production suppliers mandated (175M€)
99% in Europe / 26% in Germany

Operations

Environmental impact of activities - Eco-design of products
Talent Attraction and Retention - Employees health and safety

France Perimeter : 5 sites / 1 636 employees / 342 M€ turnover

- Audincourt (Headquarters + R&D)
- Burnhaupt
- Marines
- Marles-les-Mines (Luton, branch)

Transformation, painting and assembly of plastic material

- Maubeuge

Assembly

Spain Perimeter : 7 sites / 1 028 employees / 170 M€ turnover

- DAFE
- Espana
- Aragon
- Navarra
- Tubsas Automocion (Headquarters)

Lightings, Metals

- Plasticos

Lightings, Metals, Plastics

- Valladolid

Plastics

Germany Perimeter 2 sites / 184 employees / 96 M€ turnover

- Offenau
- Ingolstadt

Assembly

Assembly, Plastics



Clients and end users

Production and delivery model – Consumer
Health and safety – Recyclability of products

Car manufacturers

France

Renault and Volkswagen 26%
Stellantis 61%

Spain

BMW, Ford, Volkswagen, Renault Nissan, Stellantis

Germany

Audi 97%
BMW

Manufacturers' automotive plants

90% of Flex-N-Gate products

Spare part platform

10% of Flex-N-Gate products

Use & End of life



Brad Delorme Message

The year 2022 was again an exceptional year, but not in the way we expected. We all hoped that 2022 would be the year when the pandemic would be over and the worst was behind us. This was without taking into account the war in Ukraine, the shortage of raw materials and fuel, double-digit inflation in Europe.

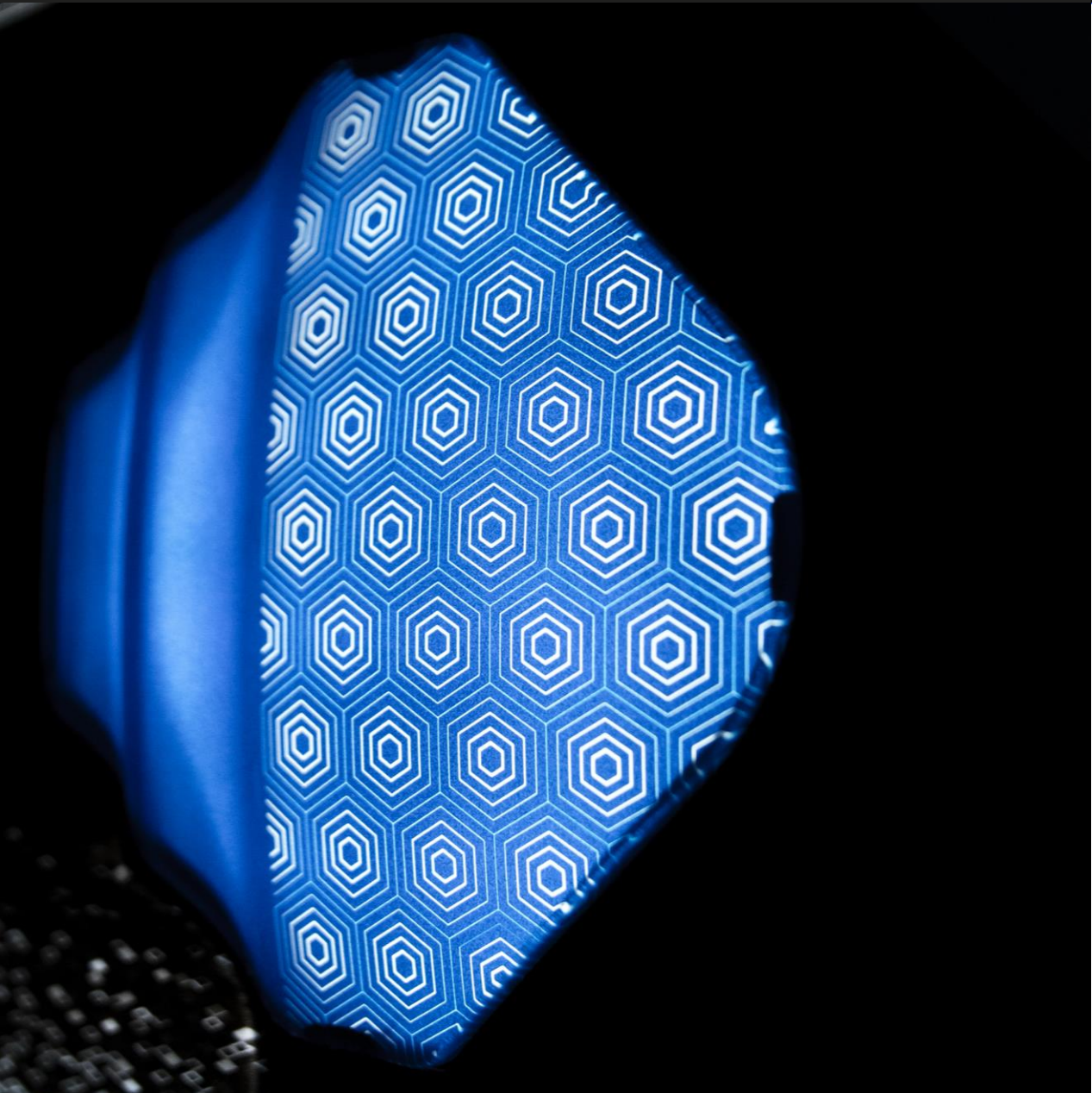
2022 was therefore a year of adaptation for our company, as it was for all of us. We had to modify our processes, our operating methods, our working conditions and our energy consumption. I would like to emphasize the rigor with which we were able to overcome the production hazards of our customers, who were affected by the various crises that shook Europe.

At the international level, the company registered good activity on flagship products (e.g. bumpers, tailgates) and the product portfolio has been extended. Additionally, an important development of lighting activity was observed with the launch of innovative projects for several clients.

Our policy of managing our resources was done in a reasoned way in order to best ensure the future of Flex-N-Gate Europe, taking into account our capacity to innovate in order to remain efficient, to guarantee our markets, to obtain the confidence of new customers and to preserve our jobs.








Although the last 3 years invite us to be measured, the Flex-N-Gate teams have shown resilience and pugnacity in a changing and complex world. The commitment to our business has remained unwavering despite the difficulties. It is with pride that I lead the Flex-N-Gate Europe group built by teams with strong values.

Vice President of Operations
Flex-N-Gate Europe



7 Pillars

After studying the threats to our business model, we established a CSR strategy based on the GRI Standards Core level. Our strategy is built around 7 pillars.

- 
Innovation & Products *Products that contribute to green mobility*
- 
Health & Safety *Safe and healthy employees*
- 
Environnement *Sites with limited environmental impact*
- 
Human resources *Activity that attracts and develops talents in territories*
- 
Sustainable procurement *Ensuring a supply that limits serious harm to the environment, health and human rights*
- 
Business Ethics *Healthy commercial relations*
- 
Territories *Contributing to the development of our territories*

Our commitment took concrete form in 2022 with the creation of a CSR department, which coordinates actions taken by purchasing, sales, research and development, human resources and health, safety and the environment.



Environmental Social Governance

CDP SCORE REPORT - CLIMATE CHANGE 2022



Flex-N-Gate received a scoring of B- for all plants in 2022(on a scale from A to D).

CDP holds the largest environmental database in the world, and scored nearly 15,000 companies on their climate change.

CDP's climate change program aims to reduce companies' greenhouse gas emissions and mitigate climate change risk.

ecovadis

Flex-N-Gate received Gold Medal 2022 for France (top 2% of companies evaluated) and Silver Medal 2022 for Spain activities (top 5% of companies evaluated).

EcoVadis overall score reflects the quality of the company's sustainability management system.



Flex-N-Gate received a scoring of B for SAQ 5,0 in Spain and France activities 2022(on a scale from A to D).

SAQ 5.0 manage sustainability issues and implement control mechanisms to verify compliance in the supply chain using the automotive industry's. SAQ 5.0 interrogates suppliers' performance on a number of key human rights and sustainability themes.

Ratings



France



70/100
95ème percentile

Spain



60/100
81ème percentile





Customer's Awards



On 15 June 2022, Stellantis held the Second Annual Supplier Awards. During this virtual event, in the presence of Chief Global Purchasing & Supply Chain Officer, and the Top Executive Leadership Team, 12 Business Partners were celebrated for their achievements.

The automaker recognized the outstanding quality, commitment and operational excellence of its suppliers. The Business Partners were honored across nine categories for outstanding performance in 2021.

Flex-N-Gate was honored to win the award of "Program Management", for the quality of deliverables, respect of schedule, project management, successful launches and technical expertise. Specifically mentioned, Flex-N-Gate has successfully launched products for Jeep Grand Cherokee, North America, as well as products for DPE programs in Europe.

Stellantis is a key and strategic partner within Flex-N-Gate's customer base and we take this recognition as an encouragement for our future collaboration. Flex-N-Gate ambitiously contributes and innovates to support Stellantis' challenges and new product developments.

At Flex-N-Gate, "Customer First" is part of our daily fabric and certainly a key pillar.

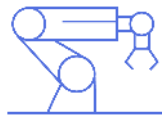
This award is evidence of that and is dedicated to all Flex-N-Gate employees around the world who have made this possible.

100
Projects

550
Patents

1
membership of
Group of Automotive
Plastic

1
Award Program
management





Michael Vermot, Executive Director of Engineering Europe

We have three main objectives for this year: to consolidate our positions and maintain our current markets, to continue to grow the company through new activities such as lighting, and to secure our 90 projects under development in Europe.

Flex-N-Gate is keen to ensure its deployment in different areas with its various customers. Engineering in the broadest sense, from innovation to the development and industrialization of the various projects, is a pillar of the Flex-N-Gate organization. In particular, it allows us to work on new technologies and new materials in order to offer our customers new innovative solutions and to follow new trends. Innovation, in particular, allows us to maintain the market and to conquer new activities.

Instinctively **innovative**

Definition

- Consumer Health and Safety
- Eco-design products
- Low-impact vehicles

Innovation policy

The main axes for research and innovation are defined at Group level. Our innovations in Europe are in line with the Group's orientations, with certain specificities that depend on the customer base and the products.

The basic KPIs to be respected in the context of innovation in our sector are the following : Compliance with specifications :

- Energy absorption
- Deformity
- Work on mass reduction
- Reduced overhang by improving impact absorption performance.
- Inclusion of green materials (recycled, renewable, naturally occurring)

Our 3 big trends

Flex-N-Gate is focusing on the Mobility of the future : enhanced perceived quality, function integration, lightweight solutions through Innovation. We manage global programs and are able to develop and integrate all components.

- **Eco-friendliness** : There is consensus on the scale of the Climate Challenge, and the urgent need for the Automotive Industry to bring new solutions to face it. Among these, the rise of Battery Electric Vehicle (BEV) has great impact on design and architecture. Work on vehicle efficiency is a key item to reduce emissions. Usage of Green materials will contribute to reduce environmental impact.



Instinctively innovative

- **Personalization and customization** Modern cars are getting closer to concept cars that were doomed to remain fantasy. From the High-End Premium to the humble popular Entry level, every vehicle integrates complex design items to make a difference. Integrated light signature has become the strongest impacting element, involving advanced decoration technologies : Light is the new Chrome. Colors and Materials continuously evolves, to surprise and seduce customers, and stand out in the crowd.
- **Mobility of the future** : Vehicles now integrate many Advanced Driver Assistance Systems (ADAS), enabling significant improvement on passenger and pedestrian safety. Most of these systems are acting without any human intervention, such as Advanced Emergency Braking System (AEBS). New mobilities are also emerging, such as Car-sharing, which require new functionalities for Human-Machine Interface (HMI). All these advanced technologies are deeply reshaping the vehicle architecture, and are opening the door to Autonomous Driving.

Our Competences

Design, CAE, Rheology, Stamping and Mechanical analysis, Optical engineering, Product development, tooling.

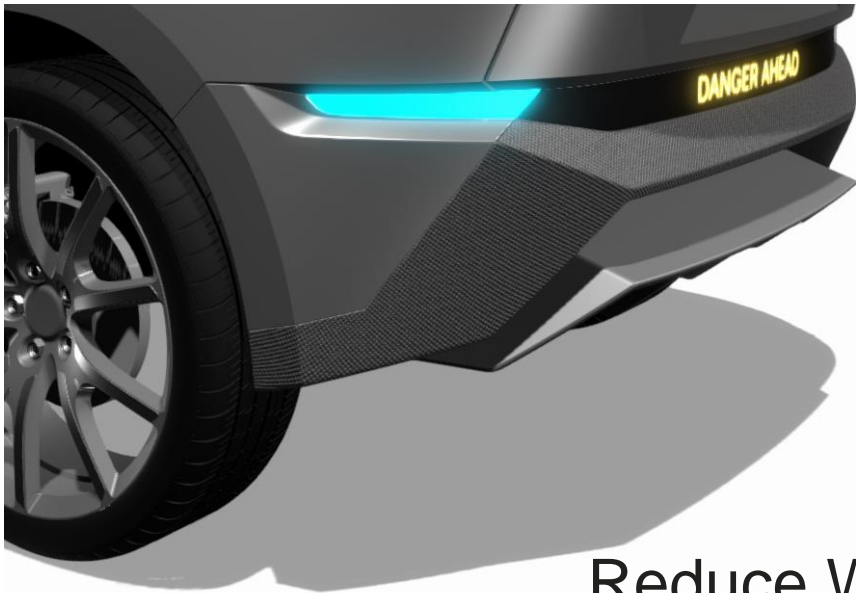


Flex-N-Gate Europe work on 4 innovations pillars:

- Lighting
- Attractiveness
- Efficiency
- Materials

We are taking into account the needs of our customers, offering personalization and customization, and accompanying them with ecofriendly solutions.

Challenging Airflow



Reduce Weight

When it comes to battery structural components, we are defining a specific action plan to meet customer needs: in the short term with thermosetting materials and in the longer term with hybrid composite or all-plastic solutions. Flex-N-Gate Europe works to produce unique hybrid products with functional integration of steel and plastics. Flex-N-Gate also combines recyclability and environmental requirements.

Clean technologies

- **Vehicle efficiency and aerodynamics**

By developing passive (air ducts) and active solutions (spoiler) to improve the Cx ratio of the vehicle, Flex-N-Gate contributes to improve the Carbon balance of the vehicle, and also extend the range of electric vehicles.

So far active aerodynamics was a solution to improve dynamic skills of the vehicle, mostly used on performance cars. But reducing CO2 emissions also goes through aerodynamics efficiency. As these are often visible parts, the customer can really see the efforts the carmaker is putting to challenge Climate Change : that's why we call this « Premium Aerodynamics »

- **Weight reduction**

Lighter products help reduce energy consumption of the car (and thus GHG emissions) and preserve the autonomy of vehicles.

We are working on several technologies to offer our clients lighter alternatives :

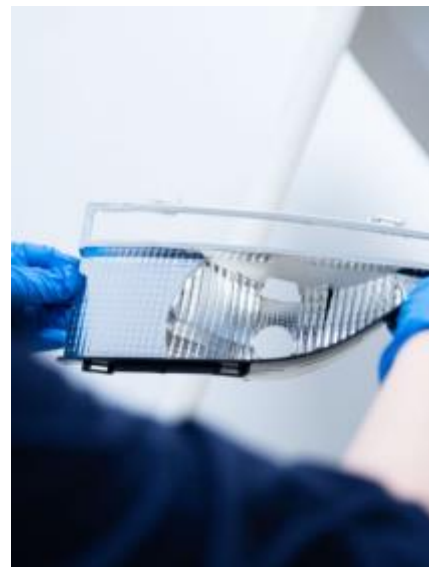
- Use of the foaming technique
- Use of hybrid of composite structures as an alternative to large and heavy components: for example in 2021, we launched our first full-thermoplastic tailgate, for a customer benefit of 20-25% reduction compared with a metallic tailgate
- Development of front end module that allows our customers to save 1,2kg / vehicle on a high-volume platform

Flex-N-Gate France (plastic)	2020	2021	2022
% of Recycled materials used in production (raw material)	10	10	12
% Revalorization of production waste	90	99	99

Flex-N-Gate Spain (metal)	2020	2021	2022
% of Recycled production waste	100	100	100

Adaptive Driving Beam

Adaptive Driving Beam (or Glare-Free High Beam) technology is a revolution for safer and more comfortable driving at night. It is a dynamic lighting systems that will see, sense, adapt and react to rapidly changing driving conditions. Flex-N-Gate’s modular application of this technology gives customers the ability to insert the ADB system into any headlamp construction that meets their needs.



Clean technologies

- **Recyclability**

2 types of plastics are used in our products : Thermoset and Thermoplastic (considered recyclable).

- **Recycled or bio-sourced materials in products**

With the threat of global warming, Flex-N-Gate is putting strong effort on eco-conception of its products. Among the different solutions to reduce CO2 impact of car manufacturing, the selection of appropriate raw materials has a strong impact.

Flex-N-Gate’s Research & Innovation team strongly pushes towards green materials, recycled or bio-source while making sure our products will still be performant and complaint in terms of products specifications.

Our ambition is to use 30% green materials (recycled or bio-sourced) for our products launched from 2025.

Recycled plastics are fully integrated in recycled material supply chain.

- **Consumer Safety**

Due to its protective function, the bumper is subject to strict regulations and is a source of innovation in pedestrian and driver safety management.

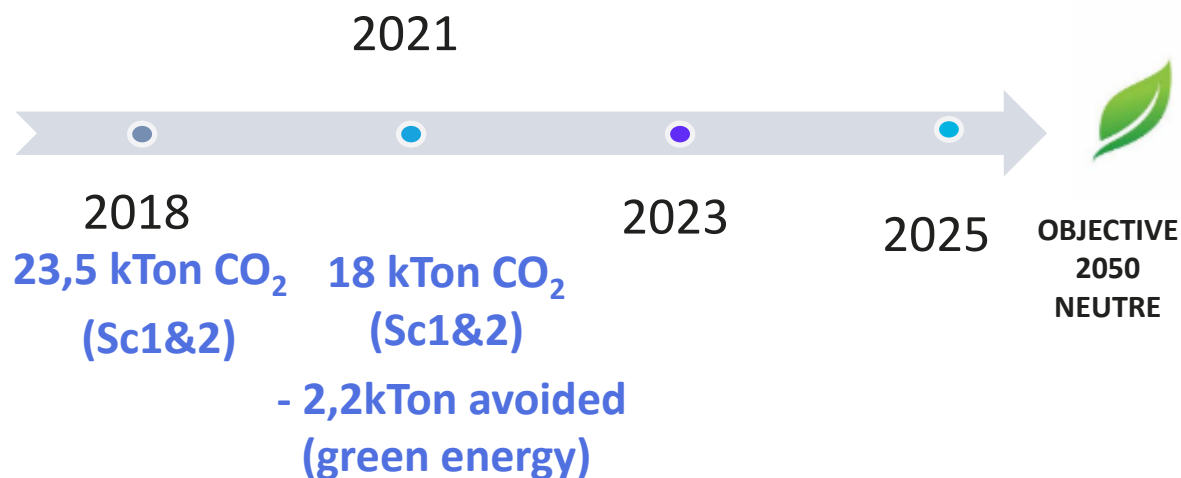
Technologies around the autonomous car and driving aids contribute to the driver’s safety. Flex-N-Gate takes the challenge to integrate various sensors, cameras, radars, and lidars into the design.

New lighting systems contain safety innovations such as radar, adaptive Driving beam.

Research work has begun on the interaction of the car with pedestrians and cyclists to signal a danger.

- **Upcoming actions**

Identify new components on vehicle that could benefit of our lightweight technologies.



Scope 1&2 : GOALS in 2025 vs 2018



Reduce of 25% CO₂ emissions

Replace 75% Scope 2 by of Renewable Energy



Scope 3 : GOALS in 2025 vs 2019

Recycled or bio-sourced materials at 30% in our products

Main ways to reach Carbon Neutrality:

A platform monitors greenhouse gas (GHG) emissions and allows Flex-N-Gate to collect data worldwide.

In addition to energy audits carried out every four years for all plants, the French plants have for several years integrated **annual GHG measurement** carried out by an external third party in order to know our direct emissions (Scope 1) and our indirect emissions (Scope 2).

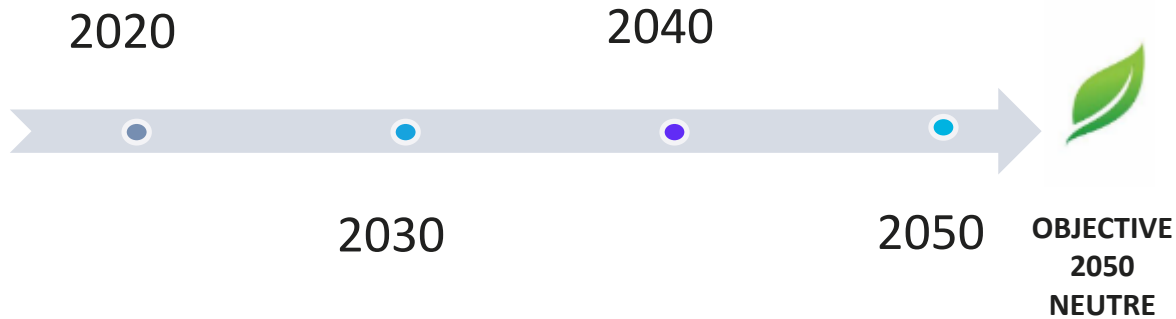
Actions plan is managed by each plant in order to reduce its **energy consumption**. The installation of LEDs, better insulation, detection of compressed air leaks, heat recovery from compressors, speed variation on pumps and air destratification are the first steps to be taken. An automated energy consumption recording is being deployed in all French plants. **By putting energetic management, plants increase energy efficiency**. A strict follow up of consumption is in place to reduce it.

75% of French plants buy green energy and have certificate of green energy. In this way 2,2 kTon CO₂ are avoided.

Moreover study are on going to implement **local renewable energy** sources and find alternative solutions to fossil energies.

FLEX-N-GATE Europe	2020	2021	2022
GHG (tCO ₂ eq) Scope 1&2	18221	17866	14060
Scope 1 (tCO ₂ eq)	9219	8895	7903
Scope 2 (tCO ₂ eq)	9002	8971	6157

Scope 1,2 &3 : neutral in 2050



Scope 3 : GOALS in 2030 vs 2018

Recycled or bio-sourced materials at 50% in our products



Reduce waste



Reorganize supply chain Strategy



**Eco conception, Eco innovation,
Life cycle Assessment**



Compensate (carbon offset projects, credits..)

Main ways to reach Carbon Neutrality:

By Reducing the amount of **waste** produced by our activities, **improving waste sorting** and find new ways of **recovery**.

Flex- N-Gate applies eco-innovation and eco-conception to our processes and products, to find new concepts and materials, reduce quantity of materials, increase the life span of products, increase green material in our products.

We implemented Life Cycle Assessment process in 2022 to quantify environmental impacts of our products and evaluate results of éco-conception to reduce CO2 footprint over their life time.

Flex-N-Gate develops a **supply chain strategy** to reorganize purchasing of raw material, reduce transport emissions and improve value chain. Moreover, work with customers on **collaborative projects** will increase to drive reusability in recycled content, and to use of returnable packaging, etc.

Finally, compensation of CO2 emissions will be launched by implementing carbon offset projects.

14

Production plants



2848

Workforce in Europe



72%

Operations Manpower



10,3

Training Hours/ employees



Flex-N-Gate Europe	2020	2021	2022
Employees Flex-N-Gate	2 799	2 777	2 848
Women rate	25,5%	28,1%	31,5%
Women in management positions rate	20%	22%	22%
Operations manpower rate	80%	73%	72%
French Turnover rate	2,9%	2,5%	3,2%
Spanish Turnover rate	0,7%	5,4%	7,2%

Social policy and fundamental rights

Definition

- Fundamental rights
- Talent attraction
- Development of competencies
- Talent retention
- Fighting discrimination and promoting diversity

Flex-N-Gate **social policy** is deployed in the group's and embrace social principles of universal application, with support and guidance from international organizations of the highest reputation, including the Sullivan Group :

- Express our support for universal human rights
- Promote equal opportunity for our employees at all levels
- Respect our employees' voluntary freedom of association.
- Compensate our employees to enable them to meet at least their basic needs
- Provide a safe and healthy workplace
- Promote fair competition

A new HR policy has been deployed in spanish plants in 2022 regarding : Child labour, Wages and benefits, working hours, modern slavery, freedom of Association, occupational health and safety.

A code of ethics is translated in all countries of operations' languages. This document is also adapted for Europe, which includes specific procedures based on local regulations. The Code of Ethics is sent to all employees, who are required to sign it upon their arrival. Information and training campaigns are carried out regularly.

All employee representative bodies are present in all plants: working conditions committee, central commissions.



Speed Recruitment organized by the UPC in Terrassa (Spain). We explain to the students our lines of business and profiles that we usually look for; we have been able to talk with them and guide them professionally.

Recruitment and Talent attraction

- **Recruitment**

Recruitments follow a formalized policy deployed by human resources direction with :

- No discrimination or favoritism.
- Guaranty that the selection process is completely objective and impartial
- Respect and humility towards each candidate
- Guaranty at all times absolute confidentiality and correct treatment of candidates' personal data in accordance with Regulation (EU) 2016/679.
- Transparency in explaining the situation of the company, the plant and the job.

An internal and external communication is realized regarding the job opportunities.

Internal communication is permitted thanks to HR tool. Each employee can have access to them.

The media strategy was maintained in LinkedIn page and permit to align and harmonize employer branding publication.

- **Recruitment of critical profiles**

Flex-N-Gate worked with headhunters for positions that face recruitment tensions to identify and build partnerships with specialized organizations. Flex-N-Gate participates in some “speed Recruitment”, organized in different cities.

Strong mobilization of local companies for an event at the Lavoisier high school in Auchel coordinated by “Association Femmes Ingénieures”



Recruitment and Talent attraction

- In Spanish plants a program to attract the over 30s with long unemployment was put in place and resulted in the hiring of 3 people.
- **Partnerships with schools**
Each site has created partnerships with school, technical, high and engineering school. It leads to participations in recruitment forums, interventions in conferences on innovation.



Flex-N-Gate Europe	2020	2021	2022
Partnerships with schools	2	3	4

Because training and transmission are essential values for our teams, it was with great pleasure that we participated in the UTBM Crunch Time. A group of students worked hard on a challenge launched by our Innovation team!

Flex-N-Gate Europe	2020	2021	2022
Training hours/employees in French plants	9	12	12,3
Training hours/employees in Spanish plants	3	8	8
Training hours/employees in Germany plants	3	4	3

Development of competencies

- **Skill development**

Since 2022, Flex-N-Gate works in process to be certified QUALIOPI, which certify the quality of the process implemented contributing to the development of skills.

In 2022, Flex-N-Gate Marles les Mines adheres to Human Intelligence by Plastium” , HR label which are based on seven pillars: visibility, sourcing, recruitment, integration, quality of life at work, management and career to improve the attractiveness of the site. The HR pole participated to workshops.

- **Trainings plans**

All sites develop their training plans each year and some training courses can lead to obtaining a certificate of professional qualification.

- **Career management**

Annual interviews are conducted yearly to appreciate employees’ performance, give them some feedbacks and allow them to share their expectations and needs for training.

After each long period of work stoppage (maternity leave, paternity leave, sick leave, work stoppage, etc.) a meeting is held with the employee.

At the end of their career, proposals are made to employees to benefit from reduced hours, progressive retirement, tutoring for the transmission of skills.



Marles-Les-Mines plant training is certified QUALIOPI and participates to HR labels



Talent retention :

The approach for managing HR topics aims at becoming more participative by asking employees their opinions on human resources topics (inclusion in working groups, survey, etc..).

- **International mobility**

A job fair system informs all employees of open offers. New modules are being implemented on the HR information system so that open position can be posted directly on the platform. Employees should access this new module. The platform will also gather all HR and welcome documents for employees in digital format.

- **Health and care**

A work-life balance policy has been launched to allow Spanish employees to finish earlier on Fridays by working a bit more Monday to Thursday. A home office policy has also been implemented at all European sites. In France, agreements were reached on disconnection.

All employees are covered by mandatory health care system and mutual health insurance. Employees have medical health checks regularly. A health system is accessible to employees through the daily presence of a nurse on some sites and a doctor from time to time. Medical visits at the request of the employee can also take place. Some Spanish plants have a physiotherapist.


 International Women's Day

A DUO, A JOB

Samy and Sabrina :

packing, assembling and mounting spare

Samy came to our site in 1999 and has worked in PR for over 3 years.

Sabrina started her first mission 4 years ago and also works in the PR.

They are in charge of packing, assembling and mounting spare parts for our customers. They particularly appreciate the dynamics and the good atmosphere that reign within their team. They all work together by sharing the daily tasks.

Diversity at work?

« It's essential ! PR has always been considered a women's sector, but these are misconceptions. »

For the Women's Day, all our sites celebrate pairs or teams of employees. Why is this? Because the strength of Flex-N-Gate Europe is not woman, but women, men, diversity... Stay tuned to discover our portraits, jobs and expertise !

Talent retention :

A social assistance service is offered on all sites, with a physical or telephone support. A listening and support platform is also available to provide employees with psychological support.

A climate survey "Flex-N-Opinion" was launched in 2022 in Spanish plants and an action plan will be deployed in 2023. Another initiative was deployed regarding mental Health with the program "Flex-N-Health" which permit employees to join in free time and have health activities.

A work-life balance program will be launched in 2023 on all French plants.

Compensation & Benefits

Extra-hours are paid and there are possibilities for bonuses depending on the employee performance.

In 2022, an economical complement was provided this year for employees to compensate their partial activity, due to lack of electronic components.

A flexible compensation is proposed to Spanish workers each year. They can choose to dedicate a part of their annual wages to healthcare services, transport, childcare service, without taxation on the chosen amount.

Sites follow a flexible working hours policy, allowing employees to manage their working hours with the validation of their manager.

Seniority leave systems and recovery systems for overtime are implemented. Parents can take parental leave.



At our Marles-les-Mines site, gender diversity is an essential pillar of the Flex-N-Gate mindset. On the occasion of Women's Day, two discussion groups were led by the site manager to freely debate the place of women in the industry. A great initiative!

Compensation & Benefits :

2022, as 2021, was characterized by a long period of partial activity. Training sessions were organized during the day of partial unemployment to maintain employees' remuneration as close to 100% as possible. It was also possible to monetize for the loss linked to partial activity.

Employees representatives propose to all employers social and cultural benefits, with payment of sport licenses, participation in cultural activities, leisure activities (cinema, theme parks,...).

Flex-N-Gate travel standard is deployed in French plants to ensure a safe and comfortable work travel, and explain rules for business trips and invitations.

Fight against discrimination and promotion of diversity :

Employees of Flex-N-Gate can anonymously report any situation of discrimination or harassment via the "Lighthouse" hotline that is externally managed by a third-party. No reprisal will be taken into account as explained in the code of conduct.

Alerts received are shared with directors and internal audits are conducted when needed. Harassment referents were identified in each plant and the Group has initiated actions on respect and issues related to sexual, moral and racial harassment.

A policy of no discrimination in recruitment is implemented and forbids discrimination and favoritism. The selection processes ensure equal opportunities and no discrimination for reasons of age, gender, ideology or nationality.



From Marles to Audincourt, all Flex-N-Gate Europe sites are mobilizing for Movember!
A great commitment!

Fight against discrimination and promotion of diversity :

All employees in Spanish plants were trained in 2022 regarding harassment. An equal plan for 2022-2024 was concluded after negotiation with unions and was launched on the topic of gender equality.

An agreement is in place for French plants regarding gender diversity. In all plants, an intentional women's rights day with workshops were organized to sensitize employees about diversity and inclusion as well as equality.

The Human Resources of the Marles les Mines plant in France is an ambassador for gender equality actions with the Ministry of Labor.

- **Disability**

Flex-N-Gate plants is a partner of ESATs, Establishment and work assistance service for everyone.

- **Seniors**

The topic of end-of-career planning is addressed in French plants in employment and competencies action plans and in the agreement on Management of Jobs and Career Paths.

Upcoming actions

- Quality of life at work survey with third-party in French sites in 2023.
- Action plan deployment on the same topic in Spanish plants
- Workshop on mental health, stress, emotional balance...
- Resume the organization of team building activities (giant barbecue..) and resuming sport activities, partly according to the associative calendars.
- Launching a policy on digital disconnection in Spanish plants



"Lion 2022": A Major Event in the Belfort & Montbéliard Region, in France

As part of our social responsibility and as an important player in the community, with more than 1,200 employees in the region, Flex-N-Gate was the main partner of the historic half-marathon, as well as other races and walks involving all age categories.

This 37th edition took place on Sunday, September 25th.

Once again, Flex-N-Gate contributed with great enthusiasm to this very important event and solidarity for the agglomerations of Belfort and Montbéliard.

This event also allowed us to mobilize our employees internally. More than 30 Flex-N-Gate employees were able to participate in the various events.

Involvement in local life :

Definition

- Involvement in local life and economy

Local Suppliers

The different plants 'commercial relations are mainly oriented towards local suppliers, in the operating country. Furthermore, and when possible, suppliers are located in the plant's region. For instance, a lot of Audincourt and Burnhaupt suppliers are from the Belfort region.

Local Schools

Partnerships with schools and universities ensure an attraction of local talents and an involvement in the schooling system, through visits, internships, apprenticeships, etc...

Local activities

Each Flex-N-Gate entities participates through sponsorship in local events.

On the occasion of the 37th edition, the 2022 Lion International Half Marathon shined this year under the colors of FLEX-N-GATE and it was called : "The International Flex-N-Gate Half Marathon".

In different sites, in September, Flex-N-Gate propose a solidarity walk. For each participation of €5 per walker, Flex-N-Gate contributes €5 for the benefit of the league against cancer.

Partnerships with "Pole du Futur / Etupes"

Flex-N-Gate Europe joins forces with Regional representative of the PFA (Automobile & Mobilizes sectors) for respond to the major challenges of the evolution of mobility and the manufacturing industry of the future.

Upcoming actions

- Mobility plan to deploy with carpooling/electric bicycle location.

64%

Plants certified
ISO 45 001



100%

Trained
Employees



100%

Employees
sensitized to
Ergonomics



81%

Ergonomics
Station
Quotations



Zero In On Safety Foundations



Lock Out
Tag Out



PPE
Safety



Crane
Safety



Forklift &
Pedestrian
Safety



Working
at Heights
Safety



Certifications

All 7 Spanish plants and 2 French plants (Audincourt, Burnhaupt) are certified ISO 45 001.

Marles-les-Mines plant in France is planned to be certified in July 2023.

Health and Safety:

Definition

- Prevention of workplace accidents : identifying and assessing all hazards affecting the health and safety of all personnel, temporary personnel or subcontractors.
- Management and Follow-up all accidents, incidents or near miss and actions plan.

Health and safety policy

- Flex-N-Gate group has formalized a health and safety policy, which is revised each year and applies to all facilities of the Group worldwide.

Program

The Group identifies safety as a priority program called “ZERO In On SAFETY” that focusses on 5 main foundations :

- Lock out/Tag out (of Equipment & Equipment lock identification)
- PPE (Personal Protective Equipment)
- Safety with regard to cranes safety
- Cohabitation between forklifts and pedestrians
- Working at Height

Provision of PPE

- All employees and temporary workers are provided with PPE by the company. PPE audits are carried out

Regulatory Watch

- Flex-N-Gate plants work with an external cabinet which informs us of the requirements and texts applicable in our factories.



Health and Safety:

Each plant follows a Health and Safety road map with specific quantitative targets that are monitored monthly.

Training

Each new manufacturing employee and temporary worker follows a mandatory onboarding program which includes health, safety and ergonomics modules. This training is renewed regularly with knowledge questionnaire at the end of training. Unsatisfactory score may result in retraining.

Employees can also access specific training depending on their workstations : CACES training, electrical clearance training.

Risk analysis

All plants conduct occupational risk assessments that are formalized in dedicated documents which are updated for every change. Analysis are made regarding different topics (cut, circulation, mental risks, ergonomics, chemicals, ATEX, exposition, ...). Suggestions in working conditions can be proposed by employees through improvement ideas.

Communication

- Different pocket guides, (forklift, chemicals risks) were deployed in 2022.
- Each month, Flex-N-EHS flash is communicated to all employees by their managers.
- Each month, a standardized document called "Safety Talk" is available to managers to share a subject related to safety or ergonomic.

Upcoming actions

- An assessment of psycho-social risks in Spain plants was done in 2022. Actions plan will be deployed in 2023. In France Psycho-social risks survey will be launched with outside company.

Flex-N-Gate Europe	2020	2021	2022
Worked Annual Hours	4 411 798	4 824 671	4 987 894
Number of injuries with lost days	74	77	84
Lost Time Incident Rate	3,35	3,19	3,37

Flex-N-Gate Europe	2022	Target
Ergonomics in Program Average of Humantech score at SOP (exclude metal program)	9,7%	<10
Ergonomics in Production Workstations analyzed with Humantech	81%	100% (in Q2/2023)
Employee having Ergonomics Training (French perimeter)	16,3%	10%



Ergonomics :

Definition

- Ergonomics is a key element, integrated in development processes to anticipate risk related to future work activities.
- Prevention of workplace ergonomics accidents : identifying and assessing all hazards affecting Health and Safety of all personnel, temporary personnel or subcontractors.
- Management and Follow-up all ergonomics accidents, incidents or near miss

Program

- An ergonomics memorandum standard is updated regularly and is deployed in each factory.
- Regarding development projects, all operations related to it must be validated by HSE / Ergonomics : Injection, Logistics, painting, assembly, Spare Parts

Ergonomic Quotation

- In 2022, a new ergonomic quotation platform was launched.
- A monthly reporting of the situation by plant and annual improvement objectives based on non-conformities are followed.

Flex-N-Gate Europe	2022
Total Workstation	1000
Workstation analyzed	820
Workstation analyzed (%)	82%



Signing in the presence of Managing Director of Agefiph, who visited the Flex-N-Gate site in Audincourt (Doubs) for the occasion and Head of the Flex-N-Gate Audincourt site.

Brad Delorme, Vice President of Operations Flex-N-Gate Europe

"This support will have a beneficial impact on the employment of people with disabilities and on the company's social policy and in particular on the values of sharing, excellence and commitment that Flex-N-Gate wishes to highlight. Raising awareness about disability internally will create a culture and a climate of trust conducive to the integration and development of employees with disabilities. »

Ergonomics :

Disability

A disability network was launched in 2020 with a designated champion for each French plant. Monthly meetings are organized to monitor projects and share best practices. Accordingly, investments in workstations adapted for people with disabilities have been made.

Upcoming actions

- Deployment of best practices in the factory: Warm-up at the start of shift in manufacturing plants and Ergonomics training
- Disability agreement : Flex-N-Gate will made a 3-year commitment to Agefiph (Association de Gestion du Fonds pour l'Insertion des Personnes Handicapées) by signing an agreement dedicated to disability. This is the result of a diagnosis carried out in 2021 by disability specialists in all of our establishments in France. This agreement aims to :
 - Promote the inclusion of people with disabilities.
 - Develop awareness-raising actions around disability.
 - Establish a climate of trust to encourage the declaration of a disability

At the same time, we will renew our support for the AMIPI Bernard Vendre Foundation by signing a contract for the supply of electrical harnesses. This contract represents the equivalent of 20 full time jobs in ESAT and Adapted Enterprises

2022	France	Spain	Germany
Disability rate	6%	3%	1%

78%
Plants certified
ISO 14001 in Europe



100%
Trained Employees
in Europe



75%
Green Energy in
Scope 2 in France



7903_{teq} CO₂
Scope 1 Emissions
in Europe



6157_{teq} CO₂
Scope 2 Emissions
in Europe



FLEX-N-GATE Europe	2020	2021	2022
Water (m³)	79 468	73 557	72 642
Electricity (MWh)	79 300	81 632	81 484
French Green Electricity	75%	75%	75%
Spain Green Electricity	21%	21%	21%
Germany Green Electricity	30%	30%	30%
Natural Gas (MWh)	41 092	50 215	44 834



Certifications

All 7 Spanish plants and 4 French manufacturing factories are certified ISO 14001.

Environment :

Definition

- Management and Follow-up : Energy consumption, Waste, Water consumption and treatment
- Prevention environmental pollution

Environmental policy

- Flex-N-Gate group has formalized an environmental policy, that sets up qualitative objectives for waste reduction, environmental protection, pollution prevention, sustainable use of resources and compliance with national or local regulations.
- Plants follow an environmental roadmap coming from environmental analysis with specific quantitative targets, monitored monthly regarding waste, GHG, oil leakage...

Energy consumption and GHG emissions

- A platform allows the collection of data for each plant (Water, Electricity, Natural gas, Petrol) and
- Energy audits are conducted actions plan followed
- Green energy contracts have been signed for French plants at 75% level of the french consumption
- All Flex-N-Gate plants in France had set up remote reading to understand consumption and find solutions to reduce it
- Several studies are on going regarding installation of photovoltaic panels

Regulatory Watch

- Flex-N-Gate plants have an external support which informs us of the requirements and texts applicable in our factories.

Plastic granule loss prevention

Audits have taken place in end of year 2022, in French plants, for the industrial plastic granule loss prevention.



Flex-N-Gate Burnhaupt
Certified: Sustainable and controlled approach to waste

FLEX-N-GATE Europe	2021	2022
Hazardous waste (t)	2 528	2396
Non-Hazardous waste (t)	15643	17733
French Valorization rate Including recycling	72%	80%
Spain Valorization rate Including recycling	98%	97%
Germany Valorization rate Including recycling	79%	80%

Environment :

Water consumption and treatment

- Production processes in Flex-N-Gate Europe with a closed loop permitted to reduce water consumption.
- Very strict monitoring of water consumption eliminates potential leaks. Discharges are connected to a treatment plant when necessary
- Annual declaration are made regarding the consumption, the rejects from the treatment when applicable.

Waste Management

- Flex-N-Gate has mandated a waste certified subcontractor to handle both hazardous and non-hazardous waste and with recovery objectives. Additionally, sites are filtering and reusing oil in their production processes for as many life cycle as possible.
- In France, each plant is equipped with a shredder to reduce waste into plastic granules.
- New waste treatment channels are constantly being sought.
- All sites are equipped with specific waste collection centers for wood, paper, plastic and for all other waste generated on site. Waste is either revalorized or recycled..

Pollution risk analyzes

- A survey plan exists to measure different rejects, noise...
- Flex-N-Gate did not declare any environmental accident.
- Procedures are in place for accidental leakage and specific emergency plans are implemented to avoid and reduce it.



Environment :

Training

Each new manufacturing employee and temporary worker follows a mandatory boarding program which includes environment modules.

Products use and end of life

- Our customers are subject to the VHU regulation that makes them responsible for the end of life of the car products they sell.
- The group follows REACH regulation that forbids to insert dangerous material into its products.
- IMDS reports are done to control the absence of substances ranked "very high concerned".

Upcoming actions

- Plan to reduce energy consumptions in progress
- Buy green energy contracts for Spain plants
- Continue training to Corporate Social Responsibility with CCI Besançon and AFNOR initiated in November 2022.
- Follow an action plan regarding tertiary decree initiated in 2022 to reduce office and logistics area consumption
- Install air destratification in plants in France.
- Assess Scope 3 in GHG emissions.

544
Production Suppliers

97%
In Europe



117
Molds & Equipment Suppliers

88%
In Europe



1271
Indirect Suppliers

99%
In Europe



100%

Trained Buyers in France and Spain to CSR



Flex-N-Gate provides a reporting hotline to suppliers and employees who wish to report conduct or fraud issues while working with the company. The calls are kept confidential. Employees will not be subject to reprisals for reporting or supplying information about potential violations.



EMPLOYEE DIRECT LINE

Threats
Theft
Fraud
Quality of Service
Sexual Harassment
Discrimination
Ethical Violations
Improper Conduct
Bribery + Kickbacks
Conduct Violations
Unsafe Working Conditions
Alcohol + Substance Abuse
Wrongful Discharge
Internal Controls
Vandalism + Sabotage
Violation of Company Policy
Misuse of Company Property
Conflict of Interest
Violation of the Law
Falsification of Contracts,
Reports, or Records

Most of the problems and complaints that arise in the work, can be solved by their direct manager or by the human resources team. In any case, if you have any problem related to the following situations, which you believe should be formally reported, our company has established a free telephone line 24 hours a day, 7 days a week, which can be used to report confidentially.

800-398-1496

CONFIDENTIALITY COMMITMENT
Lighthouse is a confidential, anonymous reporting provider that will help investigate clearly improper behavior. We are committed to protecting the confidentiality and anonymity of employees who use our system. Our reporting system is protected from third party tampering, and we have adopted social controls measures that we will maintain the integrity and confidentiality of our service. Our system and staff are committed to ensure that no report ever leaves the confidential nature of our service. Lighthouse will handle your report in strictest confidence and will not disclose your identity to anyone.

Lighthouse www.lighthouseinvestments.com/lex-n-gate

LIGHTHOUSE

See Date: 04/07/2023 Rev. 3

Sustainable Supply Chain

Main elements to be managed for a sustainable and responsible Supply Chain:

- Supplier business relationship
- Social and environmental impacts from suppliers
- Supplier-specific risks management

Purchase policy and fundamental rights

Flex-N-Gate Europe has formalized a new Supply Chain policy which applies to all facilities of the Group.

Flex-N-Gate Europe responsible Supply Chain approach is one of the structuring elements of its social and environmental responsibilities.

Before selecting a supplier and committing to a contract, Flex-N-Gate Europe pays attention to three criteria, among others:

- Performance,
- Quality
- Corporate Social Responsibility.

Our **Standard General Purchase Conditions** integrate Flex-N-Gate Europe requirements in terms of fundamental rights of everyone, environment including natural resources protection, health and safety at work, respect for human rights and compliance with labor laws.

Our industrial processes are using plastic and processed steel in a very large percentage of our production spend. The risk of **conflict minerals** usage through our direct suppliers is then very limited. However, given that some conflict minerals can be included in electronic components, there is a follow-up of the presence and origin of gold, tungsten, tin and tantalum minerals. This diligence is integrated in a specific section of the supplier' questionnaire sent to our suppliers

CSR questionnaire	FNG France	FNG Spain	FNG Germany
Supplier who responded	77%	20%	18%
Spend Covered	80%	18%	15%
Suppliers who completed CRS FNG' survey	72%	16%	16%
Suppliers certified by Ecovadis	28%	3%	16%
Overall Average CSR Score	61%	48%	60%
Overall Average Ecovadis	62%	60%	62%

Sustainable Supply Chain

Flex-N-Gate Europe Purchasing General Terms & Conditions are distributed to suppliers with each purchase order and includes social aspects such as terms on working conditions, salary, labor practices, minimum age of employees, forced labor,..

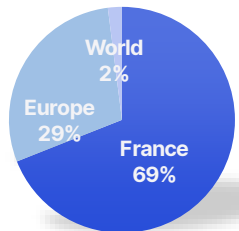
Supplier CSR questionnaire

Since 2021, a Corporate Social Responsibility questionnaire is in place. Purpose is to ask suppliers about their practices on health & safety, environment, social, human rights and conflict minerals topics.

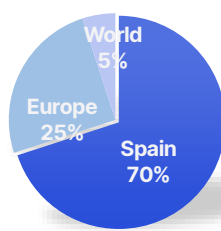
This questionnaire is deployed on the whole base of existing suppliers and is a requirement for every new vendor, except if they have an Ecovadis assessment or equivalent one.

The purchasing team evaluates and monitors suppliers' CSR performance through a rating of the questionnaire when completed by the supplier. Supplier reassessment is conducted every 3 years maximum to follow the performance improvement.

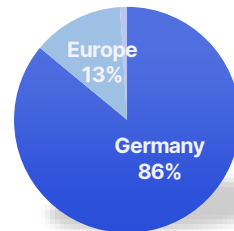
Suppliers location (French perimeter)



Suppliers location (Spain perimeter)



Suppliers non mandated location (Germany perimeter)



Business review with suppliers

Performance reviews are carried out with suppliers at least once a year for the main ones, and include CSR topics. Topics discussed are: main items of the questionnaire where a specific attention shall be paid and certifications. Action plans for the key points are then defined and monitored between two reviews.

Buyers' training

100% buyers were trained to CSR topics including Anti-corruption rules and sustainability issues.

A purchasing manager has attended a training course on Sustainable Supply Chain Manager. This module was cascaded to purchasing managers.

Flex-N-Gate Europe	2020	2021	2022	Target 2023
Production Suppliers certified ISO 14 001 (french perimeter)	49%	53%	54%	56%
Indirect Suppliers certified ISO 14 001 (french perimeter)	13%	14%	15%	19%
Production Suppliers certified ISO 45 001 (french perimeter)	-	18%	22%	24%
Production Suppliers certified ISO 14 001 (Spanish perimeter)	35%	49%	42%	45%

Sustainable Supply Chain

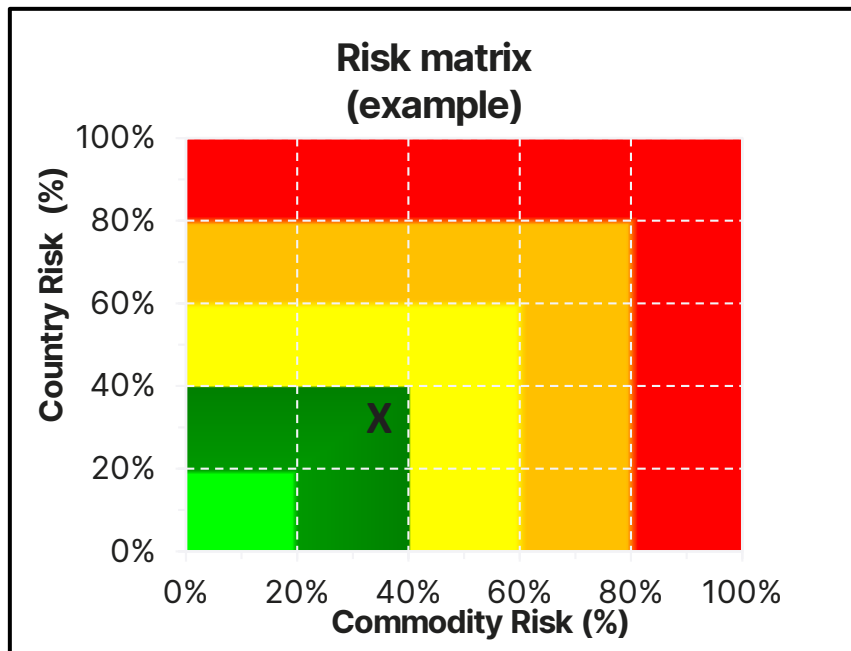
Addition of CSR criteria in the offers evaluation

Both CSR and carbon criteria were added in the Supplier Nomination Committee template. It now includes data on ISO 14001 certification and the distance between Flex-N-Gate plants and the supplier. To be selected, supplier must, at least, answer to the Flex-N-Gate CSR questionnaire or provide an Ecovadis assessment.

Audits

Supplier audits are carried out and include specifications covering the environment, health & safety and ergonomics topics. A file with the panel of suppliers is regularly updated and monitored for certifications such as ISO 14001, ISO 45001 and others.

Some vendors may leave the panel because of poor operational performances in general or in case of issues on any CSR topic.



Risk Matrix

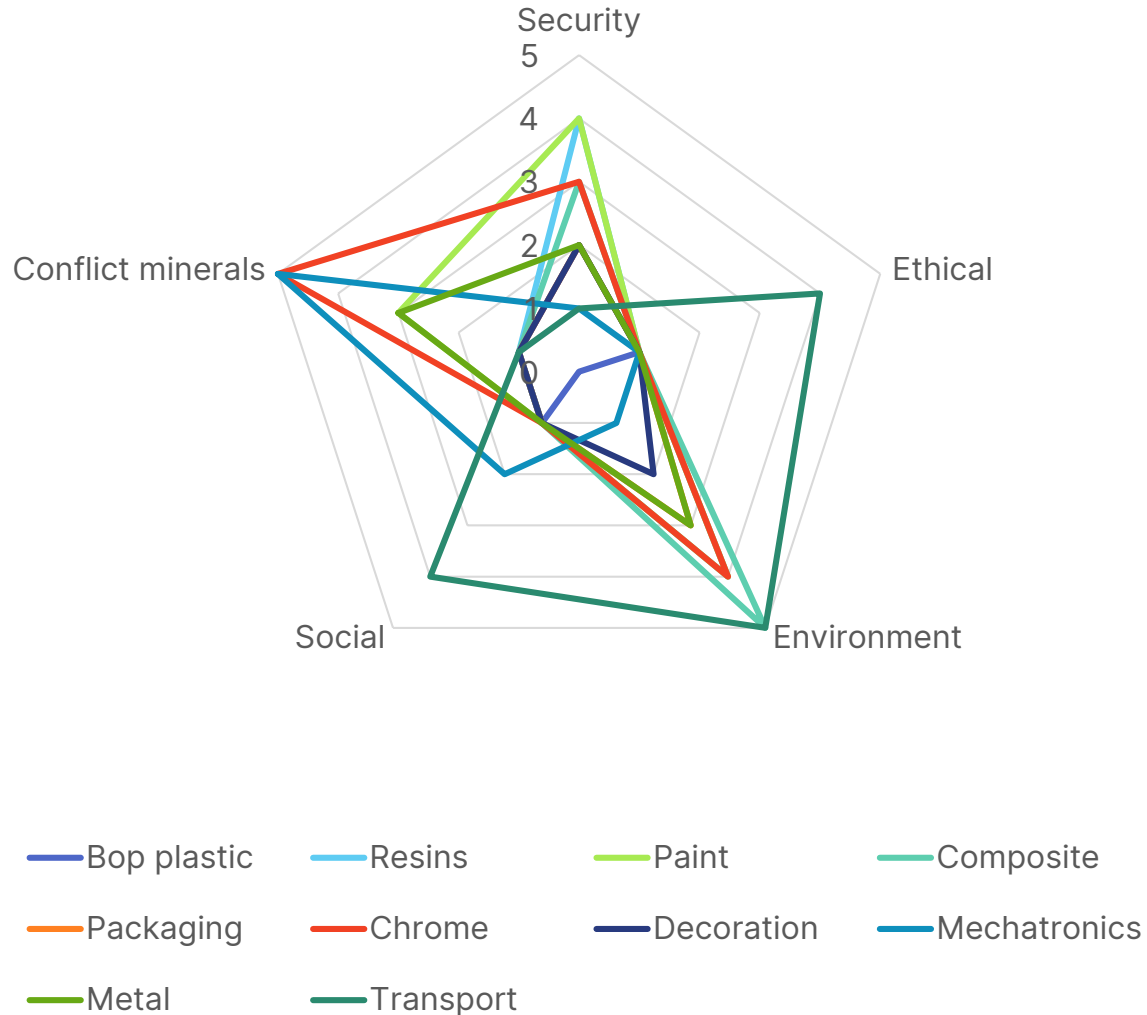
A supplier risk analysis process is in place and covers the whole production portfolio.

5 items are analyzed and quoted between 0 (low risk) and 5 (high risk) :

- Social
- Environment
- Security
- Ethical
- Conflict minerals

Two risks dimensions are analysed : commodity and country. For country risks ranking has been established aggregating elements from recognized database.

Commodity & CSR Analysis



Sustainable Supply Chain

List of suppliers - Action plan

- All production suppliers are classified taking into account the commodity and country risk.
- An action plan is implemented when the supplier is classified "medium, high risk, very high risk" for country or commodity or falls into the red and orange zones of the supplier risk matrix.

Upcoming actions

- Increase onsite visits at suppliers and pay attention to environmental and social criteria. Check during any visit to suppliers the key points of the CSR requirements (to be adapted to each supplier category and country).
- Continue buying green electricity, thanks to the current contract with energy provider 75% coverage will be at least maintained.
- Integrate a carbon cost in suppliers offers comparison table and consider it in the supplier nomination committee to compare offers on a total cost basis including the cost of CO2.
- Extend the approach deployed to production suppliers to targeted list of Indirect suppliers (MRO) and to Tooling / Special equipment suppliers.
- Continuously train the purchasing team to all new and customer specific CSR requirements.

Flex-N-Gate Europe	2020	2021	2022
Claim regarding personal data	0	0	0
Code of conduct violation	1	3	0
Incident reported via the alert procedure	0	2	1



Business Ethics :

Definition

- Business ethics
- Protection and use of personal data

Protection and use of personal data

The personal data belongs to employees, customers and suppliers. Only contact data is collected for customers and suppliers, and is only accessible by the purchasing and sales department. Employees data is limited to personal and banking data that only HR teams can access to.

Governance

The subject of data protection is handled at the global level by a data protection officer in Canada, and by data referents in each country of operation. Working group ensures the implementation of internal documentation and training..

GDPR training

In 2021, a worldwide working group was launched on GDPR and information security, including the use of personal data, to write a module on those topics. It was translated in all languages and training was provided to core teams. Communications are sent monthly to employees to sensitize them on data privacy risks. In 2022 100% of employees were trained on GDPR.

Employees consent

All Flex-N-Gate employees sign the privacy code upon their arrival. They are informed by e-mail and face to face of what is personal data, what usage the group can make of it, how long it can be kept and how to be vigilant about it. It is part of the company’s onboarding process. Since 2021, an anonymous mailbox to collect employees’ request/complaints on the subject of personal data protection has been set up.



Business Ethics :

Anti-corruption measures

Each employee receives and signs the Code of Ethics upon their arrival, which stipulates what constitutes corruption, bribery, ethical violations conflict of interest, etc.

Stakeholders can report any violation to the Code of Ethics (corruption, harassment, discrimination, etc) thanks to the alert system “Lighthouse”.

This anonymous hotline is managed by an external company mandated to receive and process alerts on ethical issues.

The information is then processed by the VP Europe Operations and the compliance Direction at Group Level.

They can lead to investigations on the reported site if needed.

Third-party ethics due diligence program

In France, to ensure compliance with regulation prior to new business relationships and for existing suppliers (including temporary employment agencies), the e-attestation platform is used for French suppliers; It provides a third party's check on all legal and administrative documents.

For all plants, internal procedures define several checks to conduct in case of suspicious inquiry are asked by business partners. For instance, the platform informal is used to do background checks when necessary.

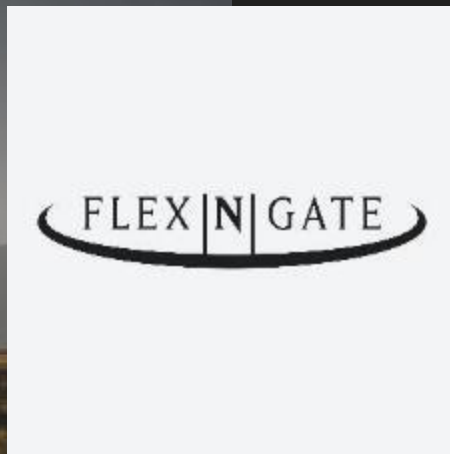
Each year, auditors come to verify the sincerity and compliance of the company's accounting with the standards in force.

An expert is appointed by the staff representatives in France perimeter and ensures the soundness of the accounts.

Upcoming actions

Train all employees on Sapin II law and code of ethics

Work on a module to present the corruption issues



Certaines sections de cette présentation contiennent des déclarations prospectives qui sont fondées sur nos attentes, estimations, projections et hypothèses et sont faites conformément aux dispositions d'exonération de la loi applicable. Ces déclarations ne constituent pas des garanties de performances futures et impliquent certains risques et incertitudes imprévisibles. Le contenu de cette présentation est la propriété des sociétés du groupe Flex-N-Gate et peut être modifié en tout ou en partie sans préavis. Le texte, les images, les graphiques, la mise en page et les informations de cette présentation sont la propriété du groupe Flex-N-Gate. Les marques de commerce, noms commerciaux, marques de service et logos et emblèmes d'entreprise affichés ici appartiennent à Flex-N-Gate Automotive, Inc. ou à l'une de nos sociétés affiliées, ou appartiennent à des tiers et ont été utilisés avec leur permission. Tous les contenus sont protégés par copyright, 2006. Tous droits réservés.