

Human Rights Report 2022

Grant Thornton Luxembourg

March 2023





Content

Grant Thornton Luxembourg at a glance	3
Introduction	5
Governance for Human Rights.....	7
Our public commitments to Human Rights.....	7
Determination of Salient Human Rights Issues	9
Our Management Approach	12
Health and Safety.....	12
Mental Health: Harassment, Respect, Disconnecting.....	13
Privacy and Data Security.....	15
Inclusivity and Development.....	16
Equality and Fairness	17
Assessing the impact of our day-to-day practices	19
Conclusion.....	22
Annexe.....	23



Grant Thornton

Luxembourg at a glance

Grant Thornton Luxembourg is a leading provider of Audit & Assurance, Business Advisory, Internal Audit, Financial Services, Tax & Accounting and Technology services.

With more 330 people and 24 partners, we combine a strong technical guidance with an experienced dedicated staff to ensure that clients receive a truly different experience



EUR 35m
(2022 revenue)



24
Partners



330+
Employees

Audit & Assurance

Our audit & assurance department is specialised, and assigned exclusively, to tasks reserved to the Luxembourg Auditors ("Réviseurs d'Entreprises Agréés"). Our Audit Partners are members of the Luxembourgish "Institut des Réviseurs d'Entreprises" (IRE) and we have over 100 people committed to delivering high quality audit & assurance services in Luxembourg.

Business Advisory

At Grant Thornton Luxembourg, we offer a comprehensive range of business advisory services to help you achieve your goals. We help you create, transform and protect value. From finding ways to finance growth to understanding how to manage risk and regulation; from identifying opportunities to optimise operations, to getting the best from talent, our global network provides the expert support you need to thrive in a fast-changing world.

Internal Audit

Grant Thornton's internal audit experts provide a systematic disciplined approach designed to assess companies' control environment and improve the efficiency of governance, risk management and business processes. We add value to organisations by helping them monitor risks and identify competitive advantage, leading to an overall improved performance.

Financial Services

In an increasingly complex regulatory environment, we help private equity and real estate asset managers to concentrate on their core activities by delivering high quality fund administration and shareholder services through a partnership approach. Our experts provide expertise and support that asset managers need to thrive in today's evolving market.

Tax & Accounting

Grant Thornton Luxembourg has been delivering tax, accounting, and business advisory services to private and institutional clients, locally or globally for more than twenty-five years.

Technology

Grant Thornton's technology transformation team applies deep technology, data, cloud and automation experience with fresh strategic thinking and proven partners to find the best path to your goals. With the right practical approach, you can make the moves that will help you achieve your technology transformation vision.



Introduction

Introduction

Grant Thornton Luxembourg is a company providing Professional Services to various Corporates, Financial Market Participants, NGOs and other institutions in Luxembourg. Although we consider our risk to be moderate when it comes to causing, contributing to or being linked with human rights violations, we are committed to respecting and stewarding the human rights of our employees. Because we believe that these commitments begin “at home”, we place these principles at the center of our corporate culture.

This report is published in reference to the UN Guiding Principles Reporting Framework Parts A and B and it specifically addresses the way we operate in our day-to-day practices and our approach to embedding human rights within our organisation.

LU  **EMBOURG**

**PACTE NATIONAL
ENTREPRISES ET
DROITS DE L'HOMME**

UN GUIDING PRINCIPLES

REPORTING FRAMEWORK





Governance for Human Rights

Governance for Human Rights

Our public commitments to Human Rights

Grant Thornton Luxembourg became a United Nations Global Compact signatory in 2021. We are therefore publicly committed to placing the respect for Human Rights at the heart of our business. In 2022, we also signed the National Pact on Human Rights in Business, thereby renewing our commitments to have a strategic approach to the determination and management of salient human rights issues. By adhering to these initiatives, we make our public commitment available to the people who are most concerned.

We acknowledge, that the way we operate has a direct impact on our employees. As we grow, we aim to continue striving to improve our policies and procedures and promote our organic corporate culture of fairness, respect and inclusiveness.

In 2022, in order to gain feedback from our employees on the operational effectiveness of the measures we have in place and to address their satisfaction and wellbeing at work, we conducted our first PeopleVoice survey. Part of this exercise aimed to ensure they feel safe, heard, included, and respected at the workplace. The results of this exercise helped us determine the relevant potential issues we should address, and the residual risk associated with each human right. It should be noted that our Human Resources department has enforced, for several years, an open-door policy which allows all employees to raise concerns about all types of human rights-related issues (or employment issues in general). They can do so in all languages spoken by our employees, and our Human Resources Department guarantees confidentiality and non-retaliation.










Determination of Salient Human Rights Issues

Determination of Salient Human Rights Issues

Although event-related Human Rights risk analyses were carried out over the year 2022, due to internal and strategic decisions and external factors, no dedicated Human Rights related risk analysis was performed in 2022. An assessment was performed in the early months of 2023, relating to our own operations including our considerations on our performance and approach to Human Rights in 2022 serving as a base for our future risk analyses. The inherent and residual risks identified were weighed and prioritised based on the severity of activities present in our own operations. Further, the inherent risk was weighed and prioritised according to the probability of occurrence should no management system have been implemented, while the residual risks were weighed and prioritised by taking into consideration the dedicated measures used to address the Human Right issue it pertains to.

The table below summarises the salient human rights issues mapped as pertinent to Grant Thornton Luxembourg in 2022, and the inherent risks associated with each one.

In 2023 we aim to address our exposure and introduce additional policies, procedures and tools to manage our exposure to these risks, however low it might be. We plan to carry out regular risk analyses throughout the year to identify, weigh and prioritise these risks accordingly. Further to our analysis we will set up additional goals as required to ensure sustainable growth in line with our commitments.

Salient Issue	Inherent Risk	Interpretation in Business Context
Life, Liberty and Security Everyone has the right to life, liberty and personal security.		In a business context, we consider this right to refer to the right of physical health and safety.
Freedom from Torture No one shall be subjected to torture or to cruel or degrading treatment.		The most relevant expression of violations of this right is the occurrence of harassment in the workplace.
Equality Before the Law You have the right to be treated by the law in the in the same way as everyone else.		We consider this right to be respected through the annual evaluation which applies to all our employees.
Remedy by Tribunal You have the right to remedy by competent tribunal.		In the context of our company, we consider this right relevant to the whistleblowing process and grievance mechanisms in place.
Fair Public Hearing You have the right to a fair public hearing.		This right is linked to the evaluation process, its fairness and impartiality.



Privacy

No-one has the right to interfere with your privacy, family, or home.



This right is linked to the evaluation process, its fairness and impartiality.

Freedom of Belief

You have the right to freedom of belief and religion



This relates to our non-discrimination practices, on the basis of belief or lack thereof

Freedom of Opinion

You have the right to freedom of opinion and expression.



This right is central to our human resources management. In order to foster a healthy and appreciable work environment, we focus on giving every collaborator a voice.

Freedom of Assembly

You have the right to freedom of peaceful assembly and association.



This right is guaranteed by Luxembourgish law, either through participation in a union or by the election of a delegated representative.

Work

You have the right to desirable work and to join trade unions.



Our very existence, in and of itself, is an expression of our adherence to this fundamental human right. We further apply it to the prospects of professional development for the current employees.

Rest and Leisure

You have the right to rest and leisure.



In the context of increasingly flexible work schedules and increased remote working, this is a particularly relevant right for professional service businesses as it relates to the right to disconnect.

Education

You have the right to education.



We provide our clients with deep expertise on specific matters as they relate to our company. To maintain a high quality of delivery, we therefore not only employ skilled, educated professionals, but also focus on providing them with training opportunities throughout their careers.

Mutual Responsibility

We all have a responsibility to the people around us and should protect their rights and freedoms.



This Human Right is anchored in our company's CLEARR values.



Our Management Approach

Our Management Approach

Health and Safety

Under Luxembourg law, the employer is obliged to take all necessary measures to protect the safety and health of its employees. These activities include information and training activities, occupational risk prevention and the implementation of a safe organisation. The firm legal requirements are to:

- Avoid risks
- Assess risks which cannot be avoided
- Combat risks at their source
- Adapt work to human beings (with particular reference to the design of the workplace and choice of working equipment and methods)
- Take account of the progress of technology
- Replace dangerous items with safer or less dangerous equivalents
- Plan prevention by seeking a coherent whole which bases prevention on many factors: technology, work organisation, working conditions, social relations and the influence of environmental factors at work
- Take collective rather than individual protection measures
- Give suitable instructions to workers
- Designate a worker to oversee the activities linked to health and safety in the workplace (the Designated Worker)

The firm collaborates with the health and safety Designated Worker, the ASTF, our occupational medicine representative, and the staff delegation to ensure employees have health and safety information. The inventory of positions at risk is validated by ASTF. A SSTL consultant was enlisted in 2022. Health and safety concerns are addressed during quarterly meetings and when intervention is necessary. The health and safety Designated Worker manages the system with the health and safety representative and an external consultant. Complaints and requests from employees are brought forward in quarterly meetings, and management makes adequate decisions. Communications are made via the corporate intranet which is available to every employee.

Since the start of the COVID-19 pandemic, a "Covid Team" committee has been set up, composed of the Senior management, the health and safety delegate, Human Resources, the health and safety Designated Worker, and the Building security officer to ensure that the necessary measures are put in place.

The health and safety of our collaborators is central to our approach to creating a safe performance-driving professional environment at Grant Thornton Luxembourg.

To ensure the continuous fostering of a healthy environment, we offer our collaborators a number of trainings linked to workers' health provided by ASTF. First, we provide an annual mandatory one-hour training on psychosocial risk prevention covering various topics such as burnout prevention, well-being at work and psychological needs. We also provide an annual mandatory one-hour webinar on the risks associated with teleworking and working at a desk, including the risks associated with posture, work system settings, space planning and the general working environment.

Further, the safety of our employees is paramount to Grant Thornton's management. We therefore also provide trainings geared towards ensuring the safety of our teams. In that regard, we provide two trainings on harassment prevention, both of which are mandatory depending on the grade, one for staff and the other for managers and senior management.

Additionally, our safety team members are required to undertake a dedicated training on building evacuation as well as a First Aid training, provided by an external service provider.

All trainings are offered over a number of sessions on different days of the week in the morning, to ensure all staff are available – especially part-time staff – and all are dispensed both in English and in French. Should a team member be unavailable for any of these trainings, we ensure to record the sessions – with the service provider's prior consent – and make recordings available as e-learning for employees to undergo these trainings at their earliest convenience. All trainings are provided at no cost to the employees, and, as they are provided during work hours, employees are remunerated for their participation.

Mental Health: Harassment, Respect, Disconnecting

As a member firm of the global Grant Thornton International network, we adhere to the network's global CLEARR values. They govern our conduct of business, allow us to provide the best service clients, and define our behaviour within and outside the firm.

Unite through global **Collaboration**



- Provide distinctive client service to all clients regardless of origin
- Share knowledge, opportunities, and best practices for the benefit of our clients and the development of our people
- Bring a global perspective to our advice and our actions
- Cooperate with others to get things done and achieve results
- Work together to bring resources and expertise to serve all clients
- Take pride in our global identity and make it part of our everyday language

Demonstrate **Leadership** in all we do:



- Represent Grant Thornton Luxembourg in such a manner as to enhance our reputation and distinguish ourselves in the marketplace
- Take a leadership position on issues of importance to our profession, the firm, and our society
- Lead and communicate with clarity and confidence
- Exercise initiative to make a positive difference
- Have the courage to live by these principles without compromise in word and action. Commit to doing what is right
- Challenge ourselves to be the best we can be and inspire others to reach their full potential.

Promote a consistent culture of **Excellence**



- Be better tomorrow than we are today, individually, and collectively
- Continue investment in our own and others' development
- Attain the highest level of competence in our area of expertise
- Develop leading-edge solutions that set the benchmark in our industry
- Achieve the highest standards of quality and innovation in everything we do.

Act with **Agility**



- Understand the world we live and work in and anticipate how changes might impact our various stakeholders
- Create and communicate clear expectations, define roles and responsibilities, and empower each member of the team
- Ensure that the right people do the right work
- Thrive in change – to understand the 'why' and to help others to do so
- React positively and respond quickly to changes in direction
- Make objective, timely decisions and act on them promptly.

Ensure deep **Respect** for people:



- Seek first to understand and then be understood
- Treat others as we would like to be treated
- Consider the perspective and opinion of others
- Give and seek regular, open, and honest feedback to one another so that we improve and grow at all levels
- Acknowledge and promote the fact that work is only one part of life
- Express genuine appreciation for others' contributions
- Resolve differences promptly and with compassion and understanding.

Take **Responsibility** for our actions



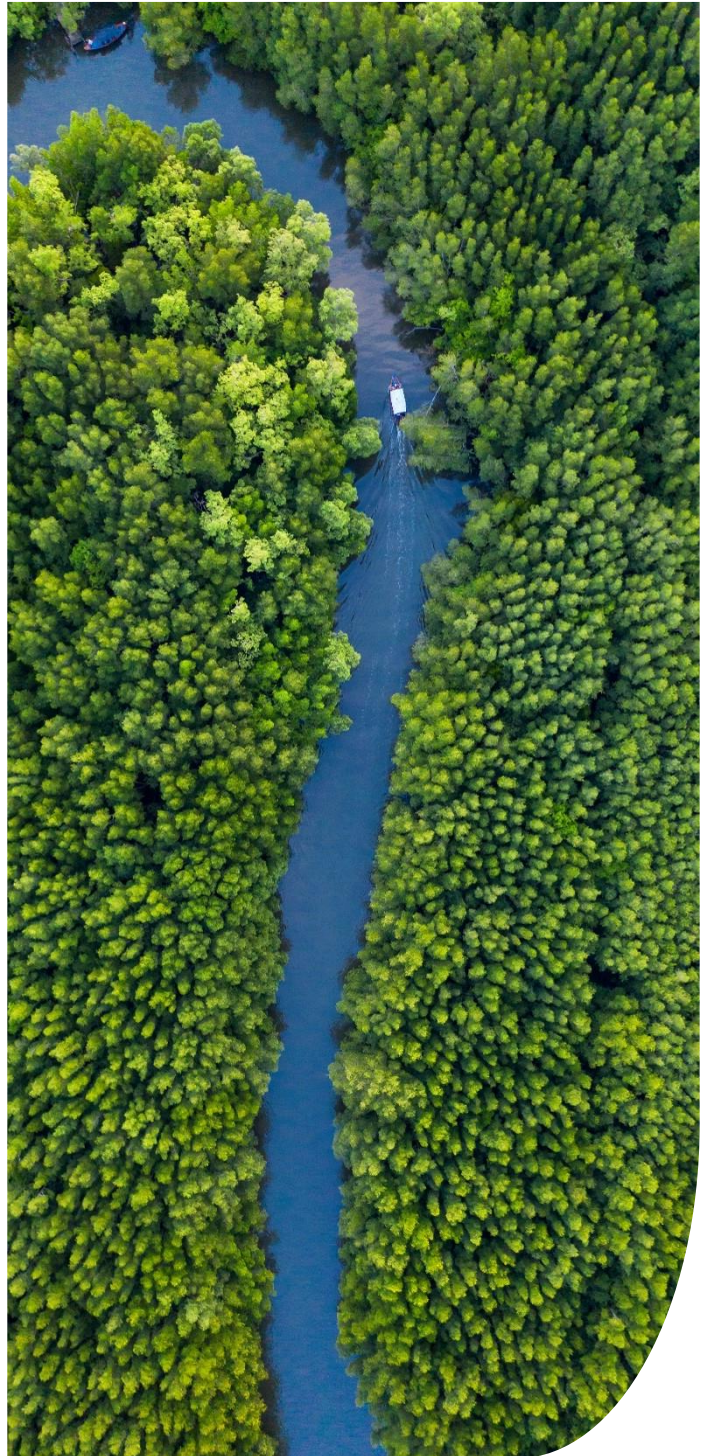
- Act as stewards to pass on a more valuable organisation to the next generation
- Make decisions that look to the long term and consider the wider impact, in addition to our immediate objectives
- Act with integrity. Be transparent in carrying out our duties, accept accountability for our results and use our influence wisely
- Honour our commitments; do what we say we will do, when we say we will do it
- Speak up when something "feels wrong"
- Acknowledge our contribution to mistakes, act promptly to rectify them and in so doing, incorporate new insights and awareness.



As part of our efforts to prevent the occurrence of incidents of harassment in our firm, we have introduced dedicated mandatory trainings to foster a safe and respectful work environment. In addition, our Senior Management is provided with supplementary reinforced trainings to help handle potential cases in a satisfactory manner, which both dissuades these occurrences and respects the right to the presumption of innocence.

In 2022, the PeopleVoice survey we conducted towards our Grant Thornton Luxembourg collaborators revealed that 79% of them felt strongly that there is a sense of inclusiveness at the firm, that members of their team have mutual respect and that the employees are valued for their contributions and skills. A further 16% felt neutral about the issue, resulting in a total of 96% in overall satisfaction with our working environment.

As a firm providing professional services, we are acutely aware of the risks associated with our activity. Indeed, the value we provide to our clients is directly related to the ability of our employees to deliver high-quality services in fast-paced environments. We acknowledge that the most material issue faced by our employees is linked to the nature of our work which is time-demanding, fluctuates in terms of workload throughout the year and requires excellent coordination skills. Therefore, the right to rest and leisure is deemed to be one of those risks we need to monitor carefully. To address this issue, and ensure we uphold our employees' rights to rest, we have introduced several initiatives in 2022 that aim to raise our employees' awareness of their right to rest and ensure they felt safe exercising it. In July 2022 we launched the "Disconnect to Better Reconnect" campaign, sponsored by our Managing Partner and our Chief Happiness Officer, giving tips to help our employees disconnect during their summer holiday and fully exercise their right to rest. In addition, we provide training to all employees on psychosocial risks which include the burn-out risk associated with the lack of rest and disconnection.



Privacy and Data Security

Organisations play a critical role in keeping valuable corporate information secure in the face of a constantly changing threat landscape. With the rise of sophisticated cyber-attacks and evolving regulations, Grant Thornton Luxembourg continuously reassesses and enhances its data protection measures to safeguard sensitive information from theft, loss, or unauthorised access.

To keep valuable corporate information secure, Grant Thornton Luxembourg has established an information security governance with a framework of information security policies, procedures, and standards that align organisational resources toward protecting information through information security measures. The framework is aligned with the industry standard of ISO 27001. The security measures include and are not limited to: conducting regular risk assessments; implementing multi-layered security controls; training and educating employees on security best practices, such as identifying and reporting potential security risks; and adhering to relevant regulations to ensure compliance with data protection laws. The Data Centric controls put in place ensure compliance with data privacy laws and regulations such as the GDPR. The BCP and Disaster Recovery Plan (DRP) comply with ISO 22301 industry standard and provided a systematic process and procedure to efficiently restore and continue operations in a crises event.

Furthermore, Grant Thornton Luxembourg has a documented and approved incident response procedure that sets out clear roles and responsibilities for security incident prevention and response. The firm established a SOC (Security Operations Center) in June 2022 with a third-party service provider based in Luxembourg.

The IT and Security teams of the firm continuously work with the SOC for proactive monitoring & logging, incident response & recovery, and remediation activities, when required.

By implementing these measures, Grant Thornton Luxembourg has played a critical role in keeping valuable corporate information secure, protecting its reputation and credibility, and ensuring continued business success. In 2022, the firm was able to show its commitment to ensuring the security of its client data. Over the year, two incidents were investigated as potential data breaches and no actual breach was found.

Lastly, at Grant Thornton Luxembourg we apply the provisions of the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016; “GDPR”) and the Luxembourg Law of 1 August 2018 on the organisation of the National Commission for Data Protection in force since 20 August 2018 and, through this, reduce the legal liability, regulatory risk and exposure of the brand and reputation from potential offences. In addition, the Personal Data Protection Policy facilitates business integration and economic consolidation, ensuring that good privacy practices within Grant Thornton Luxembourg are consistent, harmonised and designed to achieve business objectives.

Grant Thornton Luxembourg is responsible for the processing of its employees’ personal data and for maintaining their trust in the way their personal data is processed and, in the products, and services provided to them.

Our policy explains how we handle and processes employee data (i.e. data subjects) that is collected in the course of their business. The organisation only collects personal data strictly necessary for the purposes pursued. The rights of the Data Subjects are clearly outlined in terms of:

- Right of access of the data subject
- Right to rectification
- Right to erasure (“right to be forgotten”)
- Right to data portability
- Right to restriction of processing
- Responsible disclosure

Inclusivity and Development

We aim to foster an inclusive work environment where our employees feel valued and heard. As part of our employees' satisfaction survey (PeopleVoice) we were able to collect information relating to their sense of freedom to express themselves in the workplace and the ability to discuss problems and tough issues easily. Following the findings of this exercise, we hosted more regular informal meetings to give employees the opportunity to express their feedbacks and concerns directly to HR and senior management in an informal context.

Further, Grant Thornton Luxembourg organises, every 4 years, the election of the staff representation. This election is held respecting the ITM requirements, the secrecy of balloting and serves as the operational implementation of our commitment to respect our employees' right to association and provide them with another channel of expression should they have any concerns or feedback.

As a consulting firm, our employees' skills and expertise are at the very heart of our services. We, therefore, offer various programs aiming to upskill our collaborators' competencies and maintain their command of the subject matters they specialise in. These programs include soft skills development programs available depending on the collaborator's grade, IT tools skills development, language courses, technical trainings either based on an annual training prerequisite or on demand by the employee, certifications, and professional qualifications. Further, subject to management's approval, expense reports can be provided by employees following the undertaking of external training for the company to provide financial support.

In addition to providing our employees with continuous education, we also respect our employees' right to employment and fair working conditions. We have therefore deployed several initiatives to operationally enforce these rights. For instance, our flex-time policy, in conjunction with our remote working policy – in line with legal requirements for cross-border employees, allows employees to define their working schedule and arrangements for themselves, thereby ensuring we can limit the pressure associated with the workload, increasing our employees' wellbeing at work. We also opened, in the late months of 2022, new satellite offices allowing cross-border employees to work closer to home. Further, our internal mobility program, allows them to have access to new career opportunities within the company, thereby removing the "glass ceiling".



Equality and Fairness

The Grant Thornton International “Women in Business” 2021 report, drawn from around 5,000 interviews and surveys conducted between October and December 2022 with chief executive officers, managing directors, chairs, and other senior decision-makers from all industry sectors in mid-market businesses in 28 countries, highlighted the emphasis that the coronavirus pandemic has placed on the importance of diverse leadership in times of crisis. The following year, as economies slowly recover and the worst impacts of the pandemic recede, that trend looks set to continue. Businesses across the world are taking decisive action to mould more flexible working practices around the needs of their people. They are prioritising employee engagement and modelling open, inclusive working environments. By doing so, organisations are opening the door to bring female talent into senior positions in greater numbers than ever before.

We aim to reflect gender parity at all levels of our organisation, and progress towards this goal is being made, as our recruitment and promotion practices ensure equal opportunities are provided irrespective of gender. In 2022, women made up 56% of our total new hires and more than 45% of our senior management structure (Senior managers

and Directors). Further, since 2020, the year we started reporting on gender equality at Grant Thornton Luxembourg, women have made up 50 to 51% of the overall workforce. We treat everyone fairly and never differentiate on the basis of ethnicity, race, religion or belief (or lack thereof), gender, sexual orientation, gender reassignment, pregnancy, maternity, marital status, age or disability.

Whilst Grant Thornton encourages Diversity & Inclusion, it remains important to us to take clear choices, such as proposing a neutral religious environment. While complying with the fundamental rights to religious freedom, our work place remains secular. The objective is to present the Company in a neutral manner both to customers and to employees, and also to avoid any social, religious, cultural, political or philosophical conflicts. This policy of neutrality is furthermore justified by the need to preserve the quality of the commercial relations that the Company has always maintained and continues to maintain with its clients, as well as its reputation with the latter.

In addition, every employee receives an annual review conducted with the direct supervisor and the partner in charge. The process strives to ensure fairness and impartiality, treating each employee equally. We aim to strike a balance between assessing the quality of work done throughout the year and providing the right growth opportunities to the employee being assessed.























Assessing the impact of our day-to-day practices

Assessing the impact of our day-to-day practices

The practices we have deployed throughout our organisation have allowed us to better govern the risks associated with Human Rights matters within our company, and therefore to lower our effective exposure to Human Rights risks. The table below shows the result of the residual risk analysis, as it relates to Human Rights, following an assessment of the effectiveness of our Human Rights practices.

Salient Issue	Inherent Risk	Residual Risk	Reference in the Report
Life, Liberty and Security Everyone has the right to life, liberty and personal security.			See our Chapter on Health & Safety
Freedom from Torture No one shall be subjected to torture or to cruel or degrading treatment.			See our Chapter on Mental Health
Equality Before the Law You have the right to be treated by the law in the in the same way as everyone else.			See our Chapter on Equality and Fairness
Remedy by Tribunal You have the right to remedy by competent tribunal.			See our Chapters on Equality and Fairness, Inclusivity and Development
Fair Public Hearing You have the right to a fair public hearing.			See our Chapter on Equality and Fairness
Privacy No-one has the right to interfere with your privacy, family, or home.			See our Chapter on Data Security
Freedom of Belief You have the right to freedom of belief and religion			See our Chapter on Equality and Fairness
Freedom of Opinion You have the right to freedom of opinion and expression.			See our Chapter on Inclusivity and Development
Freedom of Assembly You have the right to freedom of peaceful assembly and association.			This right is guaranteed by Luxembourgish law, either through participation in a union or by the election of a delegated representative.

Work

You have the right to desirable work and to join trade unions.



Our very existence, in and of itself, is an expression of our adherence to this fundamental human right. We further apply it to the prospects of professional development for the current employees.

Rest and Leisure

You have the right to rest and leisure.



In the context of increasingly flexible work schedules and increased remote working, this is a particularly relevant right for professional service businesses as it relates to the right to disconnect.

Education

You have the right to education.



We provide our clients with deep expertise on specific matters as they relate to our company. To maintain a high quality of delivery, we therefore not only employ skilled, educated professionals, but also focus on providing them with training opportunities throughout their careers.

Mutual Responsibility

We all have a responsibility to the people around us and should protect their rights and freedoms.



This Human Right is anchored in our company's CLEARR values.





Conclusion

Conclusion

We are committed to respecting Human Rights. We recognise our exposure to Human Rights related issues and have taken decisive action to assess and manage the risks associated with these matters.

These actions have allowed us to effectively lower our exposure to Human Rights related risks and ensure our commitments are reflected operationally at every level of our organisation.

As a signatory to the Luxembourgish National Pact for Business and Human Rights and the United Nations Global Compact, we are committed to continually reviewing our risk assessment as it relates to Human Rights within our organisation and strive to consistently improve our performance as it relates to their stewardship within our company and, subsequently, our value chain.



For further information on our commitments to Human Rights, please contact our Head of Sustainability, Fani Xylouri at sustainability@lu.gt.com

Annexe

Luxembourg National Pact Business & Human Rights – Assessment framework - Signatories 2022 INÉ

Which industry/ies are you operating in?	Services
How high do you consider your company's risk of causing, contributing to or being linked to human rights violations through your operations, products and services (i.e. operating in high-risk countries/markets/industries, complex supply chains, etc.)?	Medium
Name 10 of the most critical countries you operate in:	Luxembourg
Name 10 of the most important countries you source from:	Luxembourg, Belgium, France, Germany, United Kingdom, United States of America, Austria, Ireland, Switzerland, the Netherlands
Does your company have a public commitment in place on the respect of human rights? (i.e. a human rights policy, Code of Conduct, Supplier Code of Conduct, etc.)	Yes
How is the public commitment disseminated?	The public commitment is available to its target audiences (i.e. company website, intranet site, contracts with third parties, engaging in conversation internally and externally to raise awareness of the policy, etc.)
How was the public commitment developed?	Through an internal consultative process that contributed to the development of the public commitment
Were senior management and/or the Board involved in the development of the commitment, and did they approve it?	Yes
Whose human rights does the public commitment address?	Own employees and contractors
Does the statement relate to the human rights issues that are particularly relevant to the company/industry?	Partially

Does the public commitment cover the following human rights risk topics	<ul style="list-style-type: none">• Occupational health and safety and work-related health hazards• Destruction of the natural basis of life through environmental pollution• Data privacy• Working hours
Does your company have a human rights responsible / officer in your organisation? The Pact requires companies to "appoint a human rights officer in their organisation with the authority, skills and resources to carry out their duties".	No, but we will plan to do this in 2023
How is day-to-day responsibility for human rights performance organised within your company?	When incidents to human rights occur, they are escalated from Human Resources Department to the senior management.
Does your company have processes in place through which parties can raise concerns about human rights-related issues?	<ul style="list-style-type: none">• The processes are open to all employees, contract workers, business partners, and workers in the value chain• The processes are accessible in the languages spoken by employees, contract workers, business partners and workers in the value chain• The processes address all types of human rights issues through these processes• The processes provide confidentiality and non-retaliation
Does your company provide trainings on human rights for its employees and contract workers?	No, but training are currently being developed
The Pact requires companies to "raise awareness among its staff, at all levels of its internal governance structure, and its stakeholders of the protection of human rights in business" and "train relevant employees on business and human rights issues."	
Does your company make clear in its business relationships the importance it places on respect for human rights?	<ul style="list-style-type: none">• Yes, we have a system in place that screens existing or potential business partners against human rights-related criteria• We are currently in the process of integrating human rights into business relationships

Has your company conducted a first human rights risk assessment and identified your most salient human rights issues?	No, but we plan to do so in 2023
Does your company have a statement which highlights your organisation's most salient human rights issues? (i.e. a stand-alone statement, a human rights policy, Code of Conduct, Supplier Code of Conduct, part of a report etc.)	In progress
Which risks were specifically identified in the risk analysis?	<ul style="list-style-type: none">• Occupational health and safety and work-related health hazards• Data privacy• Working hours• A later risk analysis performed in early 2023 also helped us identify a low-risk exposure to discrimination, to the right to an effective remedy internally and the right to rest and leisure, specifically through the internal enforcement of a right to disconnect. We currently have plans for 2023 to address our exposure and introduce more policies, procedures and tools to manage our exposure to these risks, however low it might be.
Was a regular risk analysis carried out during the reporting period to identify, weigh and prioritise human rights risks?	'No, but we plan to do so in 2023
Did the risk analysis take into account the following:	Own operations and third-party workers
Were event-related risk analyses carried out during the reporting period due to internal/strategic decisions, external factors, and/or based on substantiated knowledge of potential violations at indirect suppliers?	Yes

Were risks identified during the reporting period weighed and prioritised, and if so, on the basis of which appropriateness criteria?

- **Severity of activities present in the value chain, including own operations (scale, scope and irreversibility)**
- **Probability of occurrence**

Does your company report on salient human rights issues focusing on particular geographies?

No

Were clear processes conducted to arrive at the selection based on the time frame addressed in its reporting?

Yes



Grant Thornton

www.grantthornton.lu



© 2023 Grant Thornton Luxembourg. All rights reserved.

'Grant Thornton' refers to the brand under which the Grant Thornton member firms provide assurance, tax and advisory services to their clients and/or refers to one or more member firms, as the context requires.

Grant Thornton Luxembourg and the member firms are not a worldwide partnership. Grant Thornton International Ltd. (GTIL) and each member firm is a separate legal entity. Services are delivered by the member firms. GTIL does not provide services to clients. GTIL and its member firms are not agents of, and do not obligate, one another and are not liable for one another's acts or omissions.