

S E N S E  
B U I L D  
D R I V E

# CORPORATE SOCIAL RESPONSIBILITY REPORT

C S R R E P O R T

[EFIAUTOMOTIVE.COM](http://EFIAUTOMOTIVE.COM)



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# A RESPONSIBLE FAMILY-OWNED COMPANY



EFI Automotive is a Group that specialises in the design and manufacture of actuators and multi-sensor modules for cars in extreme environments.

- An independent company since 1936
- Headquarters in France (Beynost, Lyon)
- Present on the global market for more than 10 years
- 1,800 employees worldwide
- 250 engineers and technicians
- 8% of turnover invested in R&D every year

EFI is a responsible family-owned company which, over the years, has developed its production activity around the world: in France at its headquarters in Beynost (EFI) and Joinville (EFIS), in the United States (EFC), Mexico (EFDM), Turkey (EUFİ) and China (EFEC).

## EFI AROUND THE WORLD



**18000** PEOPLE  
Group employees at the end of 2018



**United States (EFC)**  
190 people



**Joinville (EFIS)**  
80 people



**Mexico (EFDM)**  
50 people



**Turkey (EUFİ)**  
380 people



**Beynost (EFI)**  
650 people



**China (EFEC)**  
450 people

# OUR GOVERNANCE

## SUPERVISORY BOARD

Bernard THOLLIN  
CHAIRMAN

André BÉLARD

Didier SEPULCHRE DE CONDÉ

Thierry FAUGERAS



Patrick THOLLIN  
CHAIRMAN

## BOARD OF DIRECTORS



Jacques THOLLIN  
STRATEGIC  
DIVERSIFICATION  
DIRECTOR



Béatrice SCHMIDT  
MANAGING  
DIRECTOR  
EFI AUTOMOTIVE



Gérard THOLLIN  
MANAGING DIRECTOR  
AFTER MARKET



## CODIR



## DAILY

Governance of the Group is structured around a supervisory board and a board of directors, which together make up the legal steering body of the group.

**The Board of Directors** is the managing body of the Group, a family-owned medium-sized business founded in 1936. It sets out strategic direction and makes structuring decisions for the Group and its organisation. It reports to the Supervisory Board regarding its management.

**The Supervisory Board** has control over the management of the board of directors and advises on the strategic direction the Group takes. It defends general interests and also ensures that shareholder interests are well respected and supported within the Group.

To enable flexible and adapted steering suited to the different markets it is positioned on, the Group is organised around 3 consolidated entities at board of directors level. They are autonomous in their General Management and in how they carry out their operations:

The aftermarket entity is structured around the activities of production, negotiation and product distribution for the car aftermarket. It is headed by a **Aftermarket Strategic Committee**.

The diversification entity brings together the Group's product portfolio diversification activities, in particular EFI Lighting and the activities developed through start-up accelerator Axandus. It is managed by a **Diversification Strategic Committee**.

The EFI Automotive entity brings together development, production and product marketing activities for manufacturers or automotive components.

**COMEX** is the executive committee of the EFI Automotive entity. It is responsible for the deployment of the strategic directions approved by the Board of Directors on the market. It controls the Group's development and ensures smooth operation.

These three entities are represented on the Board of Directors. The Board thus facilitates good communication between the entities and guarantees coherence between their different operational roadmaps. Strategic company arbitration decisions are taken by the Board of Directors to allow better harmonisation across the entire organisation.

**CODIR**, which brings together all the directors, meets every month to discuss the main challenges faced by the Group, share decisions affecting the company, and make decisions on implementation methods.



## Our Policy

At the same time as the Governance changed, the shareholders and the Board of Directors reworked the Group Policy. It will be achieved through the company's vision, mission and values and the employees' will to make it happen through the subsidiarity principle (See the paragraph Subsidiarity).

## Our Vision

*«Act with determination and ambition. Convey our entrepreneurial passion.» Jean Thollin, 1992.*

We are a responsible family-owned company, working in a global market. We are committed to running a sustainable industrial business associated with a strong culture of service to the benefit of a community which develops humanely and economically.

We act with determination and ambition and are driven by our entrepreneurial passion.

As experts in sensor and actuator solutions, we accompany our customers in their mobility experiences to make vehicles more efficient, more comfortable and safer.

## Our mission

We are experts in the design and manufacture of sensors and actuators.

Across the Group, we are driven by the quest for excellence and the desire to offer innovative solutions adapted to the needs of the market and a proximity service.

It is through our employees' skills, creativity and involvement that we have become a privileged

supplier for leading manufacturers and outfitters.

Thanks to our effective production tool and our technological development and research centres located on several continents, we have been a recognised actor in the automotive industry for more than 80 years.

We continue to develop in this same spirit and to build together the company of tomorrow.

## Our Founding Principle

### Subsidiarity

Being EFI-minded means putting the greater good of EFI above individual or local interests.

It means working on developing the autonomy of people and organisations. It means entrusting work to the lowest level of competent authority. It means helping without disempowering and accepting help without withdrawing.

## Our Values

### Entrepreneurial spirit

We are proud to be part of the EFI Automotive Group. We work together to serve our customers in order to ensure the Group's long-term future, and, with our entrepreneurial passion, we are moving forwards to build our future together. Above all, we encourage interest in serving our community. This way, every employee enables the Group to benefit from their skills and experience and contributes to the development of the Group. We encourage initiatives aimed at improving our overall performance.







### **Sincerity**

Internally, as well as with our suppliers and customers, we work in a relationship of communication, trust and sincerity to find the most appropriate solutions quickly together. This means we can form strong and lasting partnerships. We always aim to look at situations as objectively as possible. We go beyond a theoretical approach and work together in a spirit of mutual trust and openness.

### **Responsibility**

At every level of the organisation, every employee acts responsibly in their role and contributes to the long-term development of the Group. We therefore encourage individuals to take responsibility and act in accordance with the principle of subsidiarity (autonomy, duty to help and substitution). EFI Automotive is a responsible company and at each of our locations, we comply with current standards, human rights and local legislation. We act in an ethical manner and with integrity, whilst respecting the environment.

### **Respect**

EFI Automotive employees are one of the company's greatest resources. With our diversity of languages and cultures, we together form a rich and varied community and share a common goal all while respecting our differences. We seek to make our community stronger by supporting every employee through training and skill development. At each level of the hierarchy, we respect the work of our employees and listen carefully to their ideas and suggestions.

We stand in solidarity and help each other by means of positive feedback or constructive criticism in order to strive for excellence together. Whilst we allow room for errors, we also expect each employee to recognise their mistakes, correct them in a responsible manner and accept them in order to progress and excel and thus enable the entire organisation to progress.

### **Agility/Flexibility**

We work very closely alongside our customers. We listen carefully to their specific needs in order to provide them with reliable and innovative solutions as quickly as possible and at the best price. We are moving towards a decompartmentalised and fluid organisational structure which simplifies processes and accelerates decision-making. This gives us the flexibility necessary to adapt to a rapidly evolving market.

### **Focus**

We work together to decide on the main Group objectives and maintain a shared vision in regard to their effective implementation. Furthermore, we focus our efforts on creating value for our customers and community.

**These values are accompanied by principles of action that mean we can entrench them in respect for the Group's cultural diversity every day.**

# ENGINE EFFICIENCY ●

## Sensors



Camshaft sensor



Crankshaft sensor



Magnetic trigger wheel

## Actuators



Actuator for thermal management

## Solenoids



Diesel injection actuators

Our field of activity



# TRANSMISSION EFFICIENCY ●

## Sensors



Speed sensor



Speed and temperature sensor



Mechatronics module (Multi-technologies for DCT)



Park pawl sensor



Clutch position sensor



Neutral gear sensor



IMS/TRS sensors



Park lock actuator

## Actuators



## ● LIGHTING SOLUTIONS



Light guide



Light panel



Internal  
starry sky

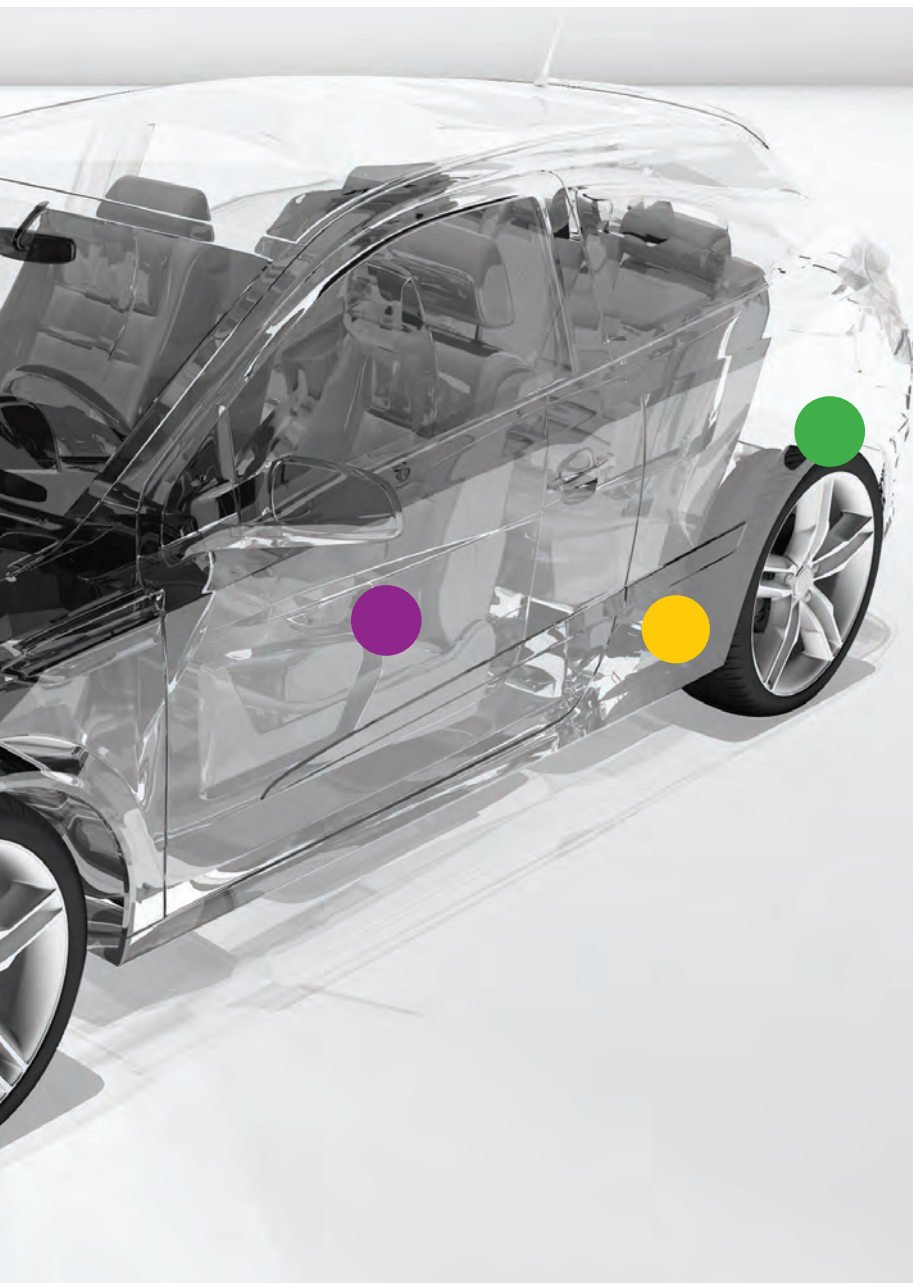
## ● VEHICLE DYNAMICS



Brake pedal sensor



Vehicle height sensor



## ● E-MOBILITY



Inductive  
through-shaft  
position sensor



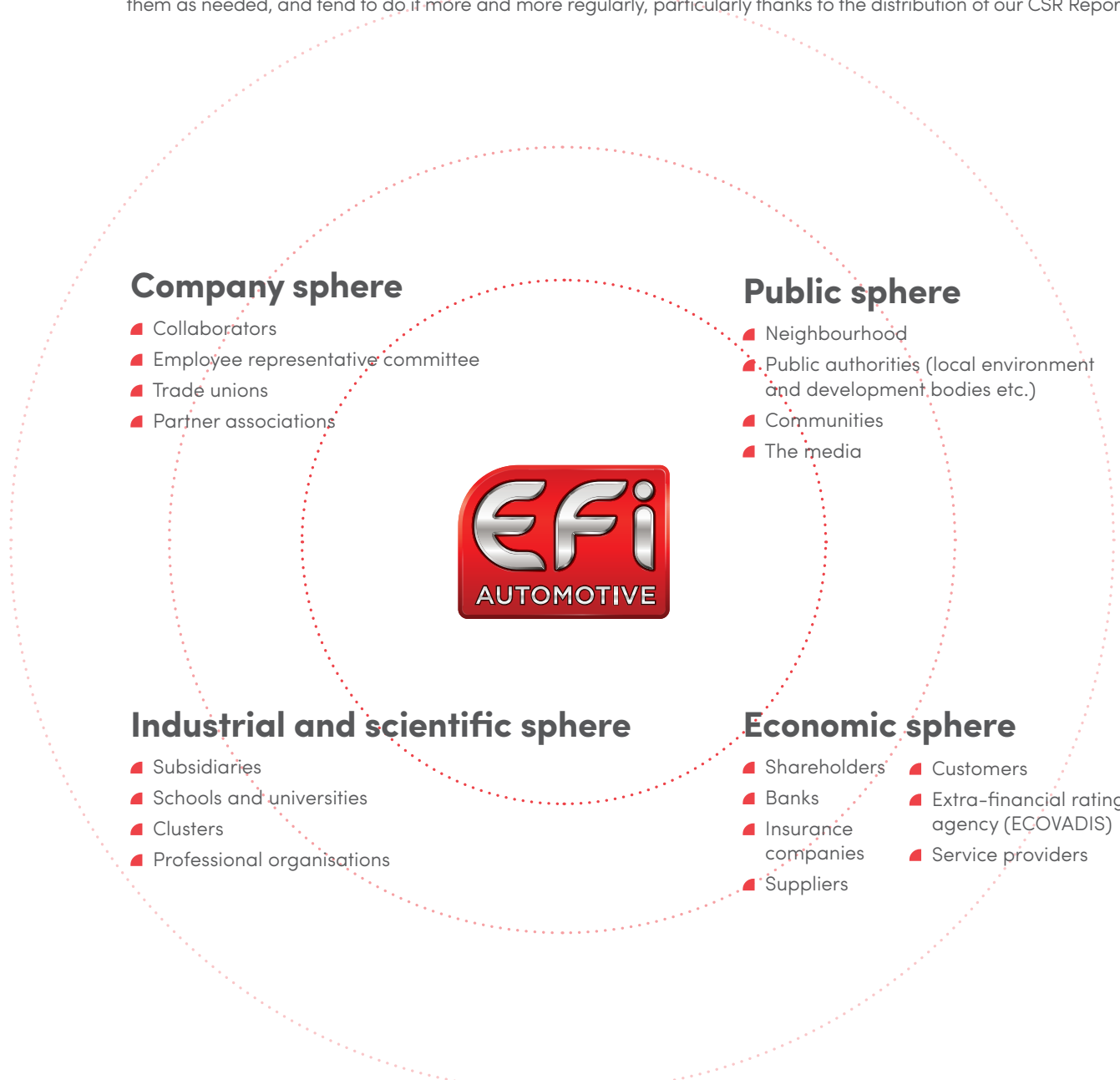
Inductive  
end-of-shaft  
position sensor



Sensor  
bearing  
sensor

# OUR STAKEHOLDERS

EFI Automotive has identified the stakeholders with whom we have a strong working relationship. We communicate with them as needed, and tend to do it more and more regularly, particularly thanks to the distribution of our CSR Report.



Indeed, we want to strengthen the links between them and our Group, so we can always better respond to their needs and requirements with coherent and adapted actions.

As an extension of these dynamics, we started using an approach of continuous improvement of our Corporate Social Responsibility (CSR) performance.

In order to objectively evaluate this performance, we called on non-financial rating agency, ECOVADIS. ECOVADIS is an online exchange and evaluation platform which identified our main strengths and our potential for improvement.

In this area, we got a score of 55/100 in 2019. This means our CSR approach is structured and proactive and that our

company shows commitment to our main issues. This approach enables us to limit the risks to our customers. ECOVADIS recognises that we follow a continuous improvement process on these issues, enabling us to consider long-term commercial relationships.

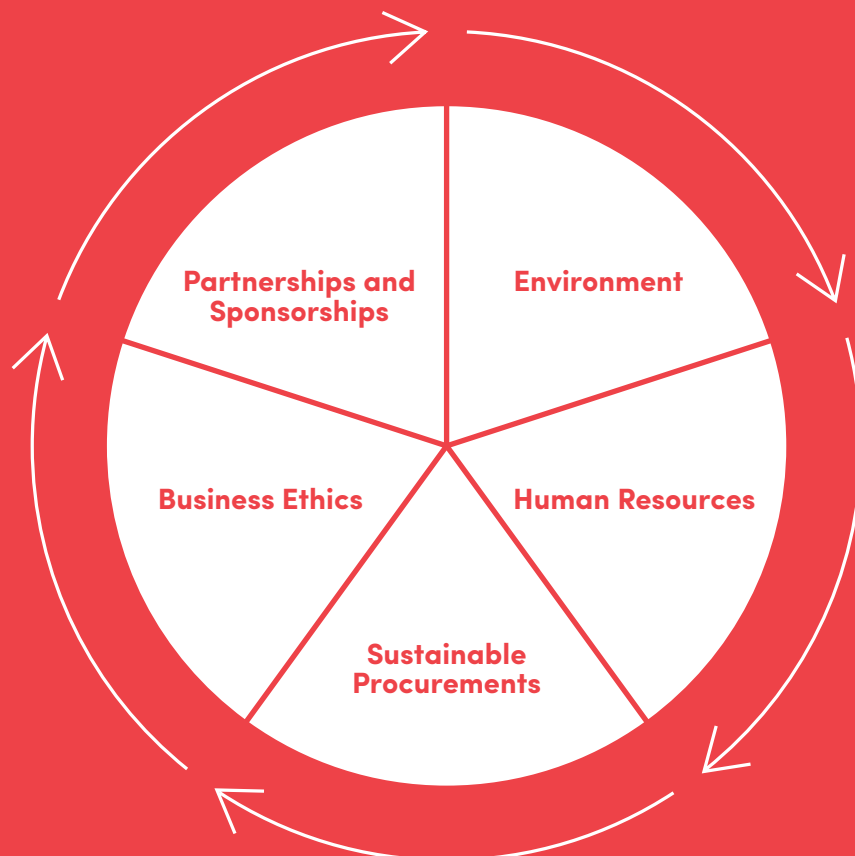


# ECO VADIS Scores

2017 / 2018 / 2019



In this Report, our policies and actions, which comply with the United Nations Global Compact Principles, are brought together in accordance with the Corporate Social Responsibility principles, which are:



# I – A SUSTAINABLE INDUSTRIAL PROJECT

Respect for both people and the environment is a topic of major concern to us. With this in mind, we are committed to an approach which protects the environment by using the principles of precaution and continuous improvement across our activities, products and services. As we are keen to preserve biodiversity and natural habitats in the vicinity of our sites, we have implemented an approach for risk prevention to limit our impact

on the environment. We are acting to prevent and reduce pollution, not only in the context of our activities, but also in the broader perspective of our products, which, in the context of energy transition, play a part in improving the efficiency of vehicles and thus reducing CO2 emissions.

We are committed to the responsible management of natural resources and raw materials and favour reduction,

reuse and recycling over waste disposal. In order to ensure consistency across all our undertakings, we ensure that we comply with the regulations in force in the countries in which we operate, and we do not limit ourselves to the strict application of their requirements.

We are aware of the importance of protecting the environment and everyone's health, and, together, we are helping to build a sustainable future.



## Certified management system and monitoring of objectives

- Deployment of an environment management system on all our sites;
- Monthly and annual follow-up on our environmental objectives as part of the board of directors' review of each of our sites;
- Annual review of environmental objectives in order to continually improve our environmental performance;
- Employee training on environmental issues, in particular through the Safety & Environment DOJO in Turkey and France.
- Set up of a KPI concerning the environmental performance per process



For that purpose, we focus in particular on:

- Reducing our consumption of energy and natural resources;
- Reducing emissions and the environmental impacts linked to our activity and to the use of our products;
- Deploying a Safety & Environment DOJO in all Group subsidiaries in 2019.

## I.1. Reducing our energy and natural resources consumption

In view of our industrial activity, we identified a high level of consumption of energy and natural resources. We work to reduce it by putting into practice the following actions:

### I.1.1. Electricity



Awareness training for all personnel at all sites on energy consumption using the “Minutes for the Environment” programme

- In France, awareness messages are displayed on switches and presence detectors have been set up to reduce electricity consumption.
- In Turkey, all lights are LEDs.

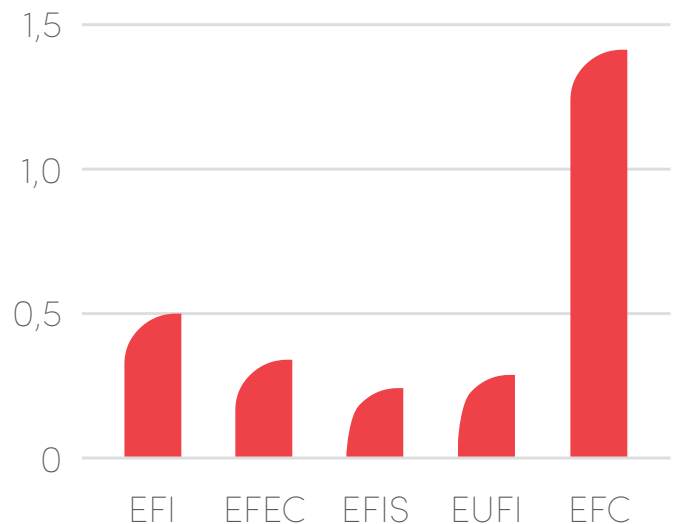
We set up a machine rationalisation system to optimise their loading volume

- In Beynost, a weekly follow-up to review an electrics operating range, which lets us change out equipment before it overconsumes.
- In China, frequency converters are used to limit energy consumption.
- For every new project in China, an energy conservation assessment is carried out in accordance with local regulation



ELECTRICITY  
CONSUMPTION  
IN KWH/1,000 PARTS

2017



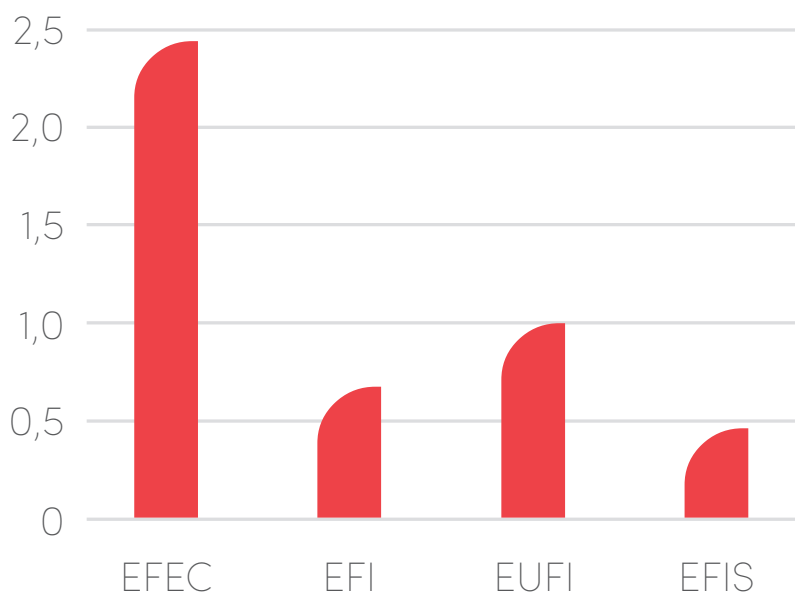
- At the plants in Beynost, switch off the car park lights for 50% of the night.
- At all our sites, switch off machines at week-ends when they are not being used.
- In Beynost, equip 100% of the lights in common areas with presence detectors progressively as the buildings are renovated (one building per year).
- In Beynost and the USA, install LED lights.
- At all our sites, reduce electricity consumption/1,000 parts by 5%.

### I.1.2. Greenhouse gas

- At the Beynost site, we draft a Greenhouse Gas report every 4 years, and implement actions as a result.
- At the Beynost and Joinville sites, we ended the use of gas R22 (Freon).
- In 2015, Beynost produced 1,852 tons of CO2.
- Ask all sites to draw up a carbon footprint report.

### I.1.3 Water

- The machines at all our production sites work on a closed or semi-closed circuit to limit water consumption.
- The industrial park of the Mexico site has shared use of a wastewater treatment plant.
- In 2011, air coolers were set up in Beynost, leading to a 50% reduction in coolant water consumption.
- The industrial and sanitary waste water quality is checked twice a year in Beynost.



WATER CONSUMPTION  
IN M<sup>3</sup>/PERSON/MONTH

2018

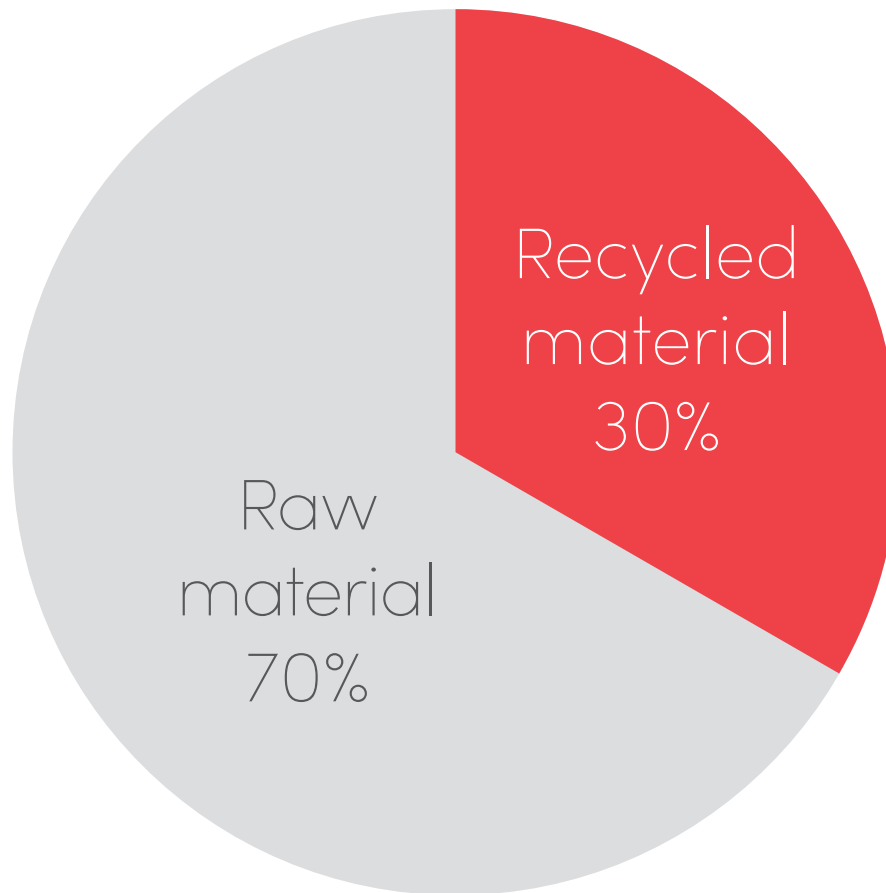
- Reduce water consumption at each subsidiary by 3% each year.





#### I.1.4. Raw Materials

- We are researching alternative solutions to limit our rare earths procurement.
- We integrate environment and safety requirements right from the products design phase to limit the use of polluting or dangerous raw materials, for our employees' health.
- We reuse crushed material for injection-moulded parts, if our customers agree.



- Reach an average of 20% minimum of crushed material in our products under development.
- End the use of or reduce the size of injection sprues by setting up technical solutions to reduce our raw materials consumption.



#### I.1.5. External aid for environmental projects

- In Beynost and Joinville, new compressors have been set up to save energy, thanks to credit awarded by ADEME, the French Environment and Energy Management Agency, who supported the project.
- A campaign has been set up to research hazardous substances in the water in Beynost sponsored by the water agency.

## I.2. Reducing emissions and the environmental effects of our activity and the use of our products

Our production activity is, by nature, one that produces emissions that can harm the environment. So it is very important for us to limit these emissions. To do so, we are doing the following:

### I.2.1. Local pollution

- Our atmospheric emissions in Beynost are analysed annually.
- The quality of our industrial water emissions in Beynost is analysed twice a year.
- A retention pond has been set up for fire extinction water at the Joinville site.
- Oil interceptors have been set up on part of the car parks in Beynost and Joinville.

- An environmental analysis implemented at all of our sites and action plans put in place to prevent local pollution.
- At all of our sites, a response procedure set up for emergency situations in case of an accidental spill.

### By 2019

- Have no polluted fire extinction water emissions at the Beynost site.
- At each site, set up good practices to prevent potential polluted water emissions reaching the stormwater.

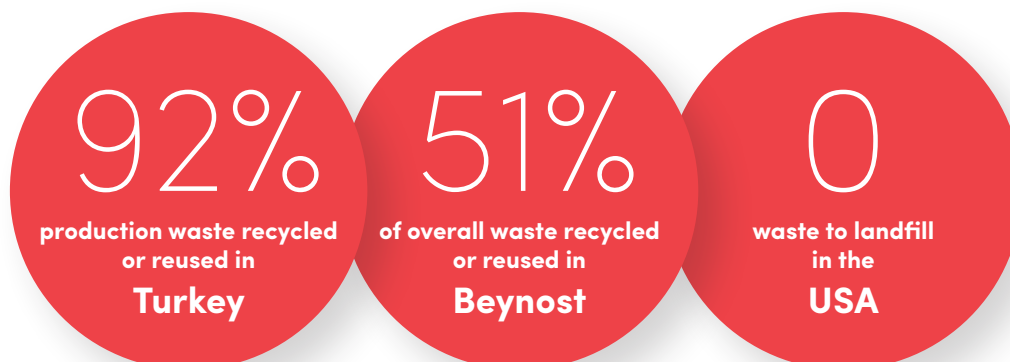
### I.2.2. Noise

- Noise audits are carried out within property lines in China, Turkey and France.
- Maintenance of a noise level below the regulatory threshold at the Headquarters and at each subsidiary where regulations require it (China, Turkey, France).



### I.2.3. Waste

- Waste sorting has been set up in each site with sorting instructions and recycling awareness sessions.
- Recycling bins are also made available in the break rooms at each plant.
- Packaging has been reduced, supplier packaging is reused where possible, and recyclable packaging is used.
- Priority is given to sustainable packaging over boxes.



- Standardise the calculation method for waste recycling at each subsidiary.



#### 1.2.4. Environmental impacts linked to our activity

- Lorry loading is optimised before they leave the Beynost and US sites, using road markings to limit transports.
- In Beynost, unloading and loading of supplier lorries takes place in the morning and the afternoon in shifts to avoid congestion for hauliers and limit CO2 emissions.



- 70% of our sites make a shuttle available to pick up the employees from the villages around the site, to avoid them taking their cars and to reduce CO2 emissions.
- Configuration of all the printers to print on both sides.



- Reduce the Significant Environmental Aspects by 10% based on the current year's environmental analysis at each site.
- Reduce our paper consumption at Beynost by 10%.



#### 1.2.5. Environmental impacts linked to the product use and end-of-life

- Since 2018, we have carried out product life cycle analyses in accordance with the requirements of ISO 14001 v. 2015. This analysis is made from design to product end-of-life in order to find solutions to reduce its environmental impact.



#### 1.2.6. Consumer health and safety

- We participate in the improvement of the efficiency of our customers' vehicles in order to reduce their CO2 emissions, and creation of solutions for electric mobility, especially with the help of our sensors for electrical and combustion engines.

**Inductive end-of-shaft position sensor for e-motor**



**Electric vehicle sensors – Measuring the rotor position**



**Speed sensor for e-motor**



#### 1.2.7 Hazardous and chemical products

- We make limited use of chemical products for production activities at our sites; we have a process in place to store, transport and handle chemical products (thanks to displays, instructions, dedicated programmes etc.)
- 100% of our sites carry out accidental spill drills at least once a year.



## Accidental spill procedure

1



ACCIDENTAL SPILL

2



ALERT THEIR MANAGER

3



GO TO AN ACCIDENTAL  
SPILL KIT

4



WEAR PERSONAL PROTECTIVE  
GEAR

5



LIMIT THE SPREAD

6



PICK UP THE PRODUCT

7



DISPOSE OF IT, IN A BAG,  
IN THE HAZARDOUS  
INDUSTRIAL WASTE BIN



## II – FOR THE BENEFIT OF A COMMUNITY WHICH DEVELOPS HUMANELY



### Working conditions policy

Entrepreneurial spirit and respect are two of EFI's six values. They translate a desire to put the human first, especially through our programmes "Being EFI" and "Managing EFI".



"Being EFI" covers deployment of the subsidiarity principle and sharing the same comprehension of the company's values, adapted to local cultural characteristics.



"Managing EFI" enables the internationalisation of the Group to be structured using Management reflexes that are common to all subsidiaries, in particular to promote a feeling of belonging to the same Group whatever country you are in. What's more, we are convinced that common and shared managerial practices boost our employees' well-being due to our managers' excellence.



Being EFI Training, with a workshop about the Group values for all the employees of each subsidiary





We also extended the scope of application of health and safety to cover quality of life in the workplace.

In view of the above, we pride ourselves on:

- Ensuring employees' safety
- Preserving employees' health
- Respecting Human Rights and developing a good quality of life in the workplace



## II.1. Ensuring employee safety

Safety forms part of the 10 strategic initiatives currently in force within the Group. EFI Automotive regards each individual's health as something to be safeguarded for both personal development and that of the community of EFI colleagues.

In order to apply this initiative at Group level, a Safety Management System has been in place for two years, with many means of implementation.



QRSC meetings (Quick Response Safety Control), during which the near-miss forms are discussed, among other things.

Launch of a standard Safety Management System  
based on ISO 45001 in 2017



### II.1.1. EFI employee safety

- Deployment of an organised network within the Group with points of contact identified in all subsidiaries to ensure employee safety:
  - Detailed health and safety risk analysis at all sites;
  - Deployment of an "Accident Description Form" to share the accidents occurring at each site with the other subsidiaries.
- Deployment of management and escalation loops at all levels right up to senior management and operational risk analyses to anticipate accidents, guarantee and improve working conditions:
  - Use of the Single Document, meaning all risks can be indexed with an FMECA-type rating to prioritise risks. Actions are ranked accordingly and followed up at QRSC Meetings;
  - Analysis of safety risks (near misses, accidents, visits, routines, audits) on panels near the machines, the production islands, and the Autonomous Production Units (APUs); then, once a week at site level, and monthly at the Corporate Directors level, a regular and in-depth follow-up at all hierarchic levels;

- Daily activity on safety risks during QRSC meetings in France;
- Organisation of Behavioural Safety Visits by the Management in order to have discussions with operators to identify the near misses and accidents to evaluate if they all know how to manage risk, comply with standards and behave in a safe manner;
- Work to eliminate work-related accidents by the way near misses are handled.

Bird's Pyramid shows that 600 near misses lead to 10 accidents with sick leave:



**BIRD'S PYRAMID**



- Priority is given to the installation of Collective Protective Equipment (CPE) and the provision of Personal Protective Equipment (PPE) if the CPE doesn't completely eliminate the risk, with PPE training at each site.

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INTEGRATION OF THE SAFETY MANAGER FOR EVERY  
PROCESS CHANGE AT EVERY SUBSIDIARY.

IN BEYNOST, POSSIBLE INTERVENTION OF THE  
OCCUPATIONAL DOCTOR AND ERGONOMIST TO ADAPT  
THE WORKSTATION TO THE EMPLOYEE

---



- Deployment of a DOJO, introduced by Turkey, in France with a roll-out planned for each subsidiary in order to train employees on machine use and safety guidelines and to raise awareness about safety risks through practical exercises. In China, we are in the very early stages of developing a DOJO, with a dedicated location on the premises.



**Safety DOJO, Beynost**



**Safety DOJO, Turkey**





## ORGANISATION OF A WORKSHOP TO RAISE SAFETY AWARENESS IN TURKEY

Guessing games mobilising the 5 senses

Raising awareness about Personal Protective Equipment

Collect employees' impressions after this experience, showing that each one is aware of the importance of keeping healthy, and preserving your 5 senses

By wearing your Personal Protective Equipment

■ Organisation of a family picnic about safety in Turkey



- Implementation of standards for cross-functionality in all Group subsidiaries:
  - Standardisation of lifting accessories, which were subject to a 6-month workshop at all subsidiaries;
  - 1 model press integrating the safety standards, relying on best practices;
  - Improvement and standardisation of our machines' pneumatic systems.
  - Creation and standardisation of a safety booklet that sets out all our safety rules
- Prevention reinforcement in employees regarding pedestrian walkways and pedestrian/forklift crossings.
- Deployment of KAIZEN workshops in China, set up in management teams, and encouragement of all employees to join in with KAIZEN activities and contribute to them. It is a short project management methodology involving employees, with concrete and simple actions for a quick benefit.



**Model press**

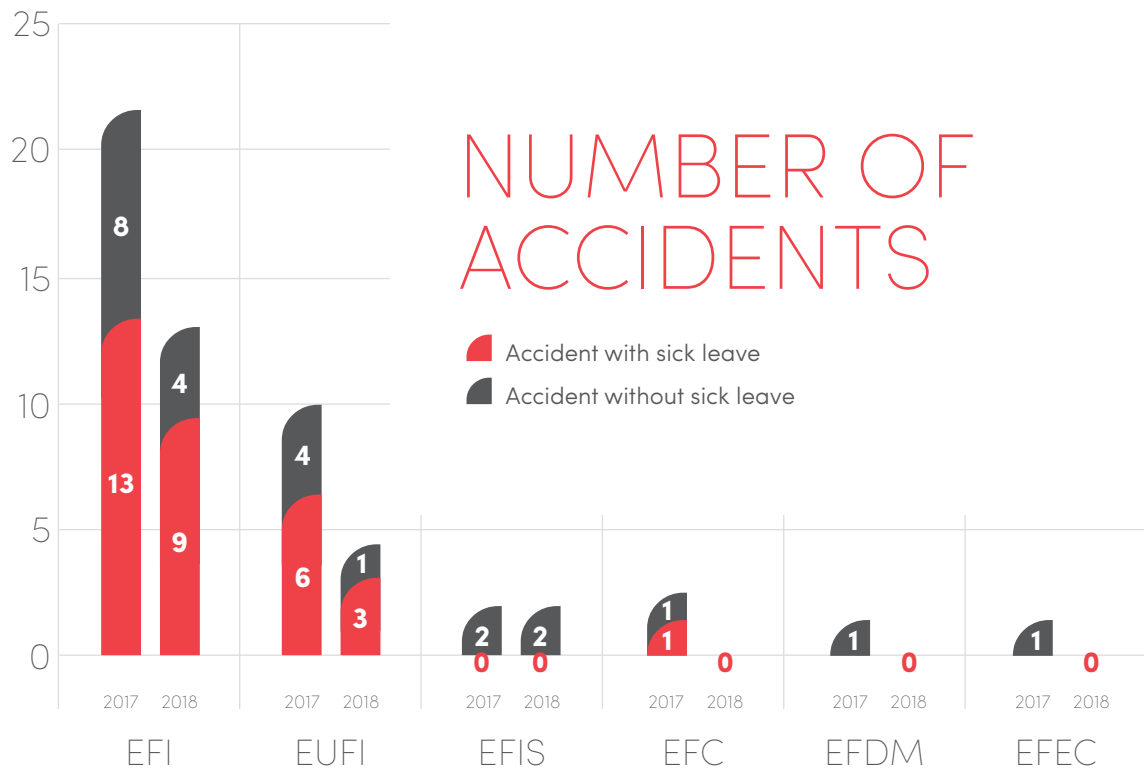


**Space dedicated to the KAIZEN workshop**

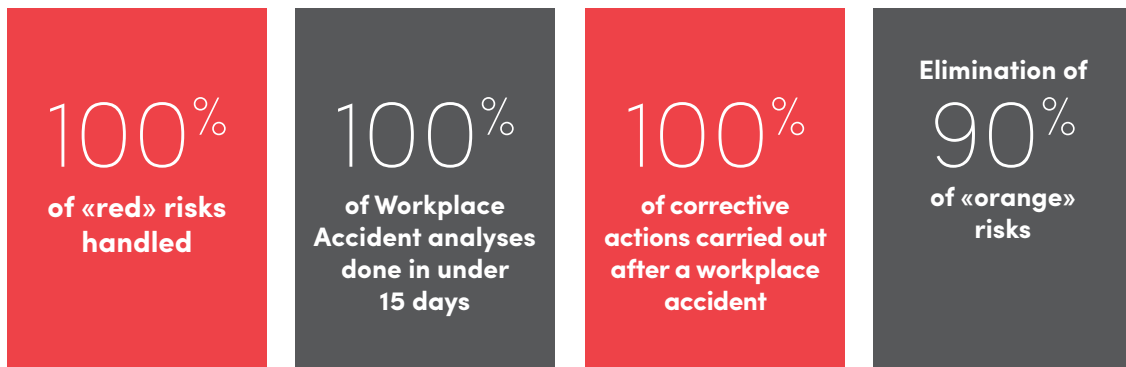
- Prevention and management of risks related to the health and safety of employees during business trips, using:



- INTERNATIONAL SOS, which proposes integrated solutions for medical and safety prevention, access to health care and intervention in case of emergency;
- An "EFI Passport" travel policy which is applicable to all sites and employees across the Group.



FOR 2019, IN ALL SUBSIDIARIES



OUR DAILY OBJECTIVE AT ALL SITES

# 0

workplace accidents  
with sick leave

### II.1.2. Visitor, service provider and sub-contractor safety



- We have co-written a prevention plan for each subsidiary aimed at the external companies working onsite in accordance with the regulations in force, analysing the risks linked to their activities and the safety instructions.

## II.2. Safeguarding employee health

Employee safety cannot be separated from safeguarding their health. That's why we endeavour to perform and monitor the following actions:

### II.2.1. Noise



- At each subsidiary :
  - Noise **measurements** on workstations
  - Employee **training** on noise issues
  - **Safeguarding** against noise by providing earplugs
- In Beynost:
  - Noise **campaigns**
  - Work with the hygiene, safety and working conditions committee (CHSCT) and the nurse on **continuous improvement** measures for noise reduction equipment better adapted to users
  - Provision of information booklets available in the infirmary

**Distributeur de bouchons**

Des nouveaux distributeurs de bouchons d'oreilles sont installés sur le site.

Les bouchons sont à votre disposition pour vous protéger lorsque cela est nécessaire. (voir signalisation)

Les bouchons sont à usage unique et doivent être portés **en permanence pour être efficaces**.

Ils sont votre protection face au bruit... **Servez-vous !**

**Information / Contact**

L'équipe Santé / Sécurité est à votre disposition :

- > Pour toute information et format; les risques liés au bruit
- > Pour la sensibilisation au port des protections auditives
- > Pour l'équipement en protections auditives moulées

**Protégez vous**

Contactez nous :

Service Médical : Poste 1301 / 1315

Service Sécurité : Poste 3582

**La réglementation**

**Bruit > 80 dB(A) = Danger pour l'audition**

80 dB(A)

Port obligatoire de protections auditives individuelles

A partir d'un niveau sonore quotidien de 80 dB, déclenchement de l'action de prévention :

- > Mesures de prévention visant à supprimer ou à réduire les risques résultant de l'exposition au bruit.
- > Information des travailleurs exposés
- > Examen audiométrique préventif
- > Mise à disposition de protections auditives individuelles.

**Les effets du bruit**

Fatigue auditive, sifflements, bourdonnements

Maux de tête

Fatigue et nervosité

Diminution de la concentration et de la vigilance

Perturbation de la communication, peut être source d'accidents de travail

Pression artérielle plus élevée, muscles tendus, fatigués

**La perte de l'audition est définitive et ne se soigne pas**

**Echelle du bruit**

Niveau (dB)	Exemple
130 dB	Reacteur d'avion
120 dB	Disques - sirène
110 dB	Discothèque
100 dB	Scielette puissante
90 dB	Éclaireur MP3
80 dB	Atelier presses
70 dB	Intérieur auto à 30 km/h
60 dB	Conversation normale
50 dB	Restaurant paisible
40 dB	Bureau tranquille
30 dB	Chambre à coucher
20 dB	Léger vent dans les feuilles
10 dB	Studio d'enregistrement

**PROTECTIONS AUDITIVES INDIVIDUELLES**

Booklet about noise prevention, available at the infirmary



- In Beynost, provide all EFI workshop operators with moulded earplugs, and equip external and interim service providers with spiral or banded earplugs provided by the company (decision adopted by the December 2018 CHSCT) by 2019.
- Systematise noise campaigns in all the Group's subsidiaries, with a set frequency.



## II.2.2. Musculoskeletal disorders



- We are working to prevent musculoskeletal disorders (MSDs) and occupational diseases with the introduction of ergonomic recommendations in our general machine design specifications.
- We provide an Ergonomic Recommendations Guide for support teams for the design or modification of workstations and their environment.



Health/ergonomics segment to sensitize on the good postures in Beynost

- In Beynost, the ergonomist participates in risk prevention right from machine design, in the event of a declared occupational disease, to adapt a workstation to a disabled or an able-bodied person, or after an accident.
- In Beynost, a lift has been installed to facilitate the access of a person with disabilities to his workstation.
- A TEMOTOKA workshop has been rolled out in Turkey with the aim of making all the equipment necessary for a task accessible and within the operator's reach.

## II.2.3. General medical follow up



- We organised the "Biggest Loser" team event in the USA: the team that loses the most weight in a given time wins an award.
- We calculated Body Mass Index in Turkey, which will be acted upon in accordance with the results.
- We provide a medical examination for all employees at least every 2 years.
- There is a nurse at the Beynost and Turkey sites.
- In France, the nurse follows up compulsory medical examinations, alerts raised by the CHSCT, and employees' workplace first aid training.
- In Beynost, the nurse performs health follow-ups through "Infirmary visit" sheets for unannounced visits outside of workplace accidents.



## Efforts to fight against tobacco

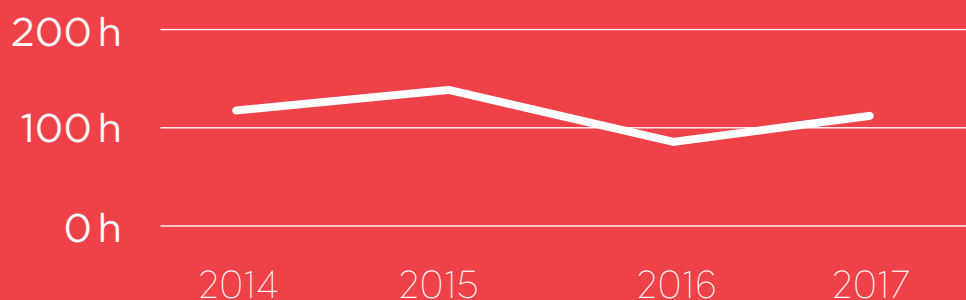
In France : Awareness campaign to stop smoking.

At all the subsidiaries : Compliance with the smoking ban inside all buildings.

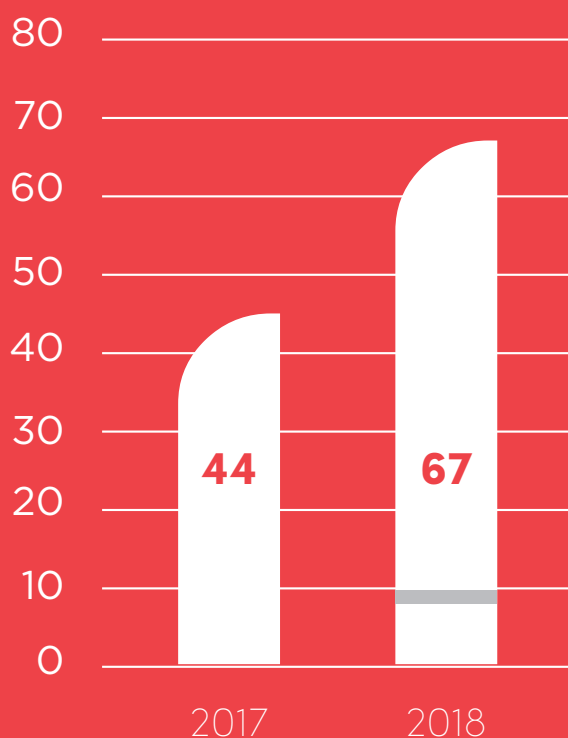
In the USA and in Mexico : 100% "non-smoker" sites.



## Analysis and intervention of the occupational doctor on workstations in Beynost *(time spent in hours)*



## Participation in the "Tobacco-free Month"



- Number of participants
- Number of participants who started support to stop smoking



18 PARTICIPANTS  
IN THE "BIGGEST  
LOSER" EVENT IN  
2018

=

9% OF THE  
WORKFORCE



58 KG (9 ST. 1 LB)  
LOST IN TOTAL

=

3.2 KG (7 LB) ON  
AVERAGE PER  
PERSON



#### II.2.4. Stress

- We work on stress prevention with "Health and wellbeing" segments in Beynost:

**4 séances de sensibilisation de 1h30 - le 24 septembre 2018**  
15h00-16h30, 17h00-18h30, 19h00-20h30, 22h00-23h30

**Le bien-être au travail**

« Ce qui est important, ce n'est pas ce qui arrive, mais la manière dont on le prend » Hans Seyle

Le service médical accompagné d'une sophrologue-coach propose de vous sensibiliser

**Objectifs :**

- ✓ Apprendre à mieux se connaître pour mieux communiquer.
- ✓ Comprendre l'intérêt d'une bonne gestion de ses émotions pour mieux vivre ensemble.

**Vous souhaitez vous inscrire (faire une demande à votre hiérarchie) qui fera passer à :**  
Francois PICARD (formation) ou Patricia LEBLANC (service médical) - **Date limite d'inscription : 14 septembre 2018**

- Organise workshops on physical stress with an osteopath in Beynost in 2019/2020.

### II.3. Respecting human rights and developing a good quality of life in the workplace

The Group's companies, along with their employees, undertake to comply with and promote international law on Human Rights, basing their undertaking on fundamental Human Rights and the rules of the International Labour Organisation.

The Group's companies also ensure compliance with the applicable laws in all their activities in all countries in which they operate and in all relations with their employees, supply chain, customers and the populations of the countries in which they are based.

They make every effort to eliminate job-related discrimination. They respect freedom of association, recognise the right to collective negotiation and ensure an active social dialogue with staff representative authorities while respecting independence and trade union pluralism.

#### II.3.1. Fight against discrimination

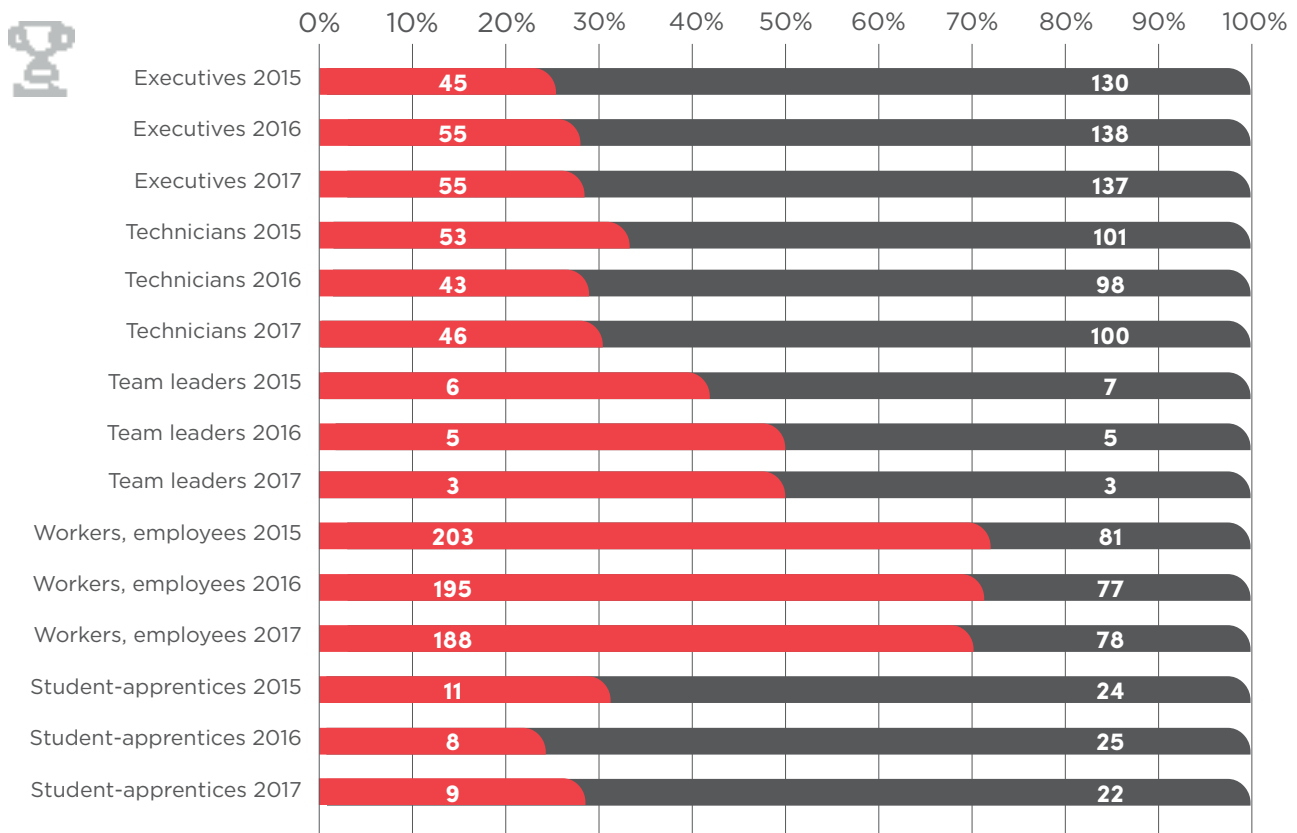
- We ensure respect for Human Rights within the Group, especially by the integration of the anti-discrimination and anti-harassment policy in the managers' training plan in France..
- Generalisation of this practice's integration to all the sites.

#### II.3.2. Gender equality

- We have signed a professional equality agreement in Beynost, that affirms our willingness to view the principle of professional equality between men and women as a right and a factor of enrichment for collective social cohesion and a factor of economic efficiency for businesses

## Evolution of male/female ratio by socio-professional categories from 2015 to 2017

 Females  
 Males



- Observe parity in the processing of the applications considered for each post by expressing this requirement to our recruitment agency.
- Facilitate access to training at the workstation for employees after they return from parental leave in France.
- Guarantee gender wage equality.

### II.3.3. Collective agreements



- In France, we have signed arduousness agreements, generation contracts and a HR forecasting and planning agreement.
- We make regular use of collective agreements in France and Mexico.
- In France, it is possible to donate days off to employees who need to support sick relatives.
- In Beynost, there's a point of contact concerning sexism questions.

### II 3.4. Staff representation



- 100% of our sites have access to trade unions, staff representatives, CHSCT or equivalent, or means for dialogue with managers.

### II.3.5. Compliance with International Labour Organisation standards and obligations



- We comply with the ban on forced and child labour in EFI.



### II.3.6. Career progression

- We carry out appraisals of employees in an individual development interview once a year that feeds into a tailored training plan, and performance interviews.
- There is a possibility of career progression thanks to training exemptions for employees.
- Operators can improve their skills to technician level with training, a case study and an exam in China, and with a diploma in France:

## OPERATOR'S SKILL IMPROVEMENT IN CHINA



Days 1 to 3 : **Training**



Day 4 : **Practical case**



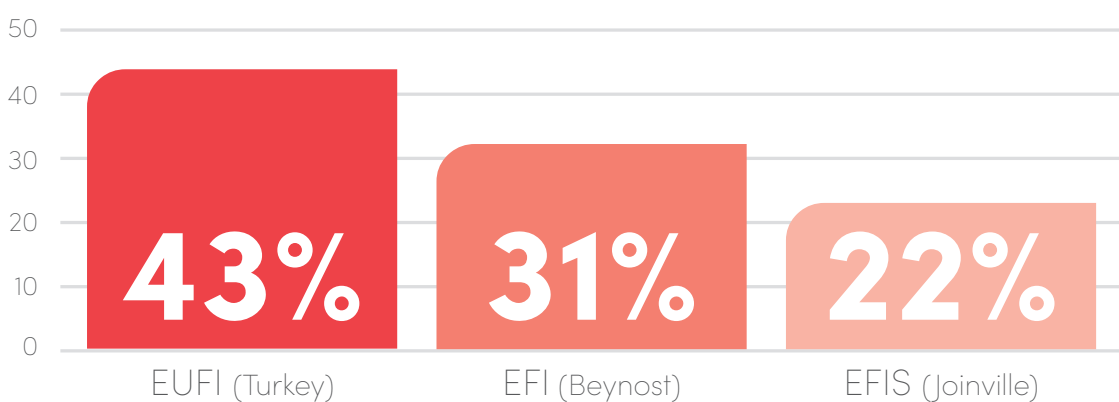
Day 5 : **Exam**

- There is practical training through Quality, Safety and Environment DOJOs.
- An e-learning tool has been rolled out for problem solving, with coaching available at all subsidiaries.

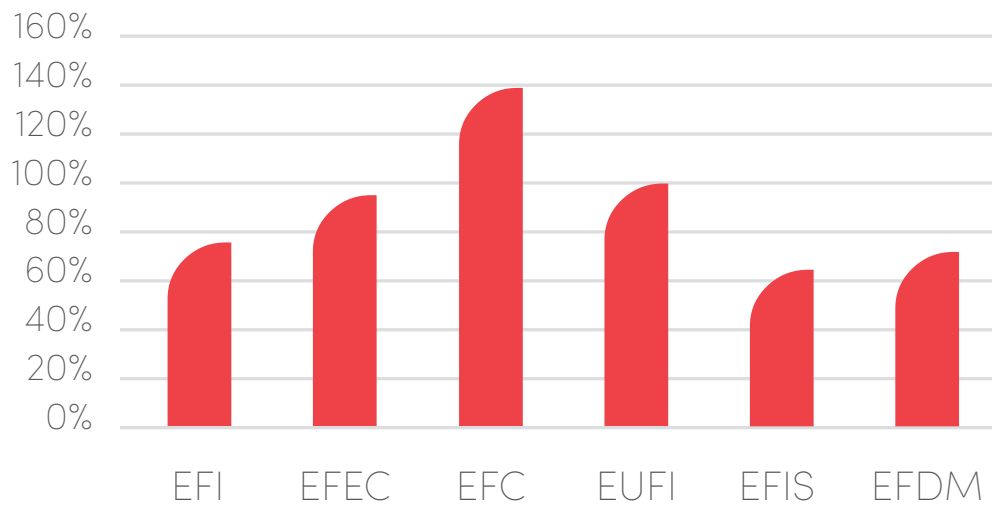


Promotions in Beynost	2015	2016	2017
Progression to executive	1	8	2
Progression to technician	0	2	8
Total	1	10	10

Employees who have undergone training in adaptation, job retention or skills development in 2017



## Progress of Training Plan in 2018



- Set up an indicator to measure the match between the skills possessed and skills required.
- Generalise the predictive skills management approach begun in France to all Group sites: AMCT (Anticipated Management of Competencies and Talents) approach.

### II.3.7. Childcare systems



- We provide easy access to childcare systems in France, Turkey and Mexico. In Beynost, we collaborate with "Crèche Attitude" childcare to enable parents who need it, to have their children cared for near their workplace.



- 91% of parents are satisfied with the structure of "Crèche Attitude" in Beynost:

## Satisfaction survey of the structure of «Crèche Attitude» in 2016



- Participation rate: **100%**
- Satisfaction overall score: **9,1/10**
- **100%** of the parents recommend this structure



## Organisation of a picnic to celebrate summer 2018 on the Beynost site

### II.3.8. Well-being



- We take into account our employees' feelings with a satisfaction survey every 2 years, and every year from 2019.
- A social worker is available in Beynost.
- In France, we have signed a Company agreement on quality of life in the workplace, with workshops organised in Beynost:
  - Experiment of a permaculture garden on the site
  - Seated massage
  - Singing lessons
  - Meditation
  - Qi Gong



### Daily Team meeting in Beynost



- There are discussions every day during daily meetings regarding different issues, such as working conditions, at all subsidiaries.
- In France, there is the option to work from home at some sites, in order to improve the work-life balance.

### QRQC Meeting (Quick Response Quality Control)

- QRQC (Quick Response Quality Control) meetings are organised daily at all subsidiaries to discuss quality problems and find solutions together in a place where everyone is free to express themselves.





## A HAPPY FARM AT WUHAN

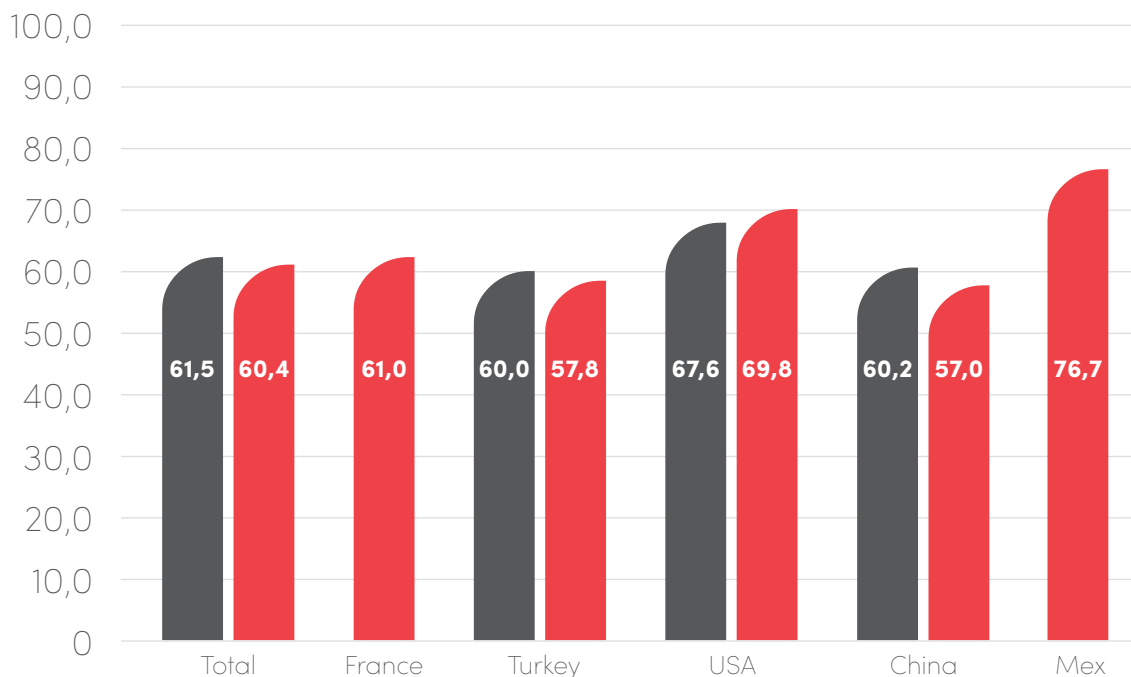
EFEC created a Happy Farm in June 2017. "It is a way of contributing to employee health." Explains the Human Resources and Administration Manager. "At weekends, and in a relaxed atmosphere, it offers alternative leisure activities to families, brings children closer to nature and allows members to get vegetables. Surplus productions – already more than a metric tonne! – are being used by company restaurants and benefiting a wider group of people." The EFEC staff syndicate organizes the Happy Farm, specifically by renting around 800 square yards from a farmer who is contractually obliged to plant and care for the vegetables without using chemicals. The costs are funded both by member employees and by the Syndicate. "The idea is taking root and the farm is being visited by an increasing number of employees. The rental contract for the land will be renewed in June!" says the Human Resources and Administration Manager.



Number of participants at the Quality of life in the workplace workshops, Beynost 2018				
Outside working hours				
Seated massages	Permaculture	Singing	Meditation	QI Gong
85 in total	15 on average	13 on average	57 in total	16 in total
During working hours				
Food/sleep		Emotional stress		
304 in total		135 in total		

## Results of the employees' satisfaction survey

2013 2016



Base 2016 :	1106	499	245	145	211	6
Base 2013 :	1034	-	209	97	223	-





### II.3.9. Salaries

■ We award a salary bonus proportional to the company's performance at all sites.

### II.3.10. Partnerships and sponsorships

Promoting responsible behaviour and actions is part of EFI Automotive's values, and the service culture is part of our objectives. That's why, at all our sites, we carry out actions and activities to help our staff and people in need. We also open up to being part of the local economic fabric in order to encourage innovation and attract new talent. We try to rally the men and women working for EFI Automotive, as well as our stakeholders in general, around our values. We are committed to cohesion between our members of staff, the integration of young people, industrial and scientific development and social aid in a broader sense.

■ EFI staff cohesion

#### Organisation of team building in China







Organisation of team building exercises in Turkey





Organisation of matches with the company's football and basketball teams





#### ■ Integrating young people

EFI commits to ambitious projects bringing young people a future and the Company, meaning. As a patron of UCLY (the Catholic University of Lyon), EFI directly participated in financing the “Passerelles” project, which aimed to convert the former Saint Paul de Lyon prison into a modern campus able to accommodate several thousands of students in the heart of Lyon.

In addition, through close links with UCLY for over ten years, EFI has participated in running think tanks on the topics of religious diversity in business, humanist entrepreneurship and the influence of humanist thinking in the world of industry.

What’s more, EFI promotes the integration of young people with internship, apprenticeship or professional insertion agreements, and on 31 December 2017, there were 42 work/study contracts in Beynost and 5 in Joinville.

We also open up access for young people to international internship contracts, enabling them to gain professional experience abroad. On average, 4 young people per year have the opportunity to work in the USA (in Quality and Plastics), and in Mexico (in Industrialisation) under this contract.

In partnership with schools, EFI regularly opens its doors to pupils and students to let them discover the world of business in France, Turkey and the USA.



In China, we organise a Family Day, where employees' children visit the factory and participate together in playful activities.



Franck, Marc, Houda, Claire, Jean-François, Gwenhael, Sandra, Didier, Alexia, Marina, Maria, Laurence and the mascot Yllade

#### Global approach to inclusion

As a sponsor of Handicap International, EFL deploys a proactive approach, founded on:

- In 2019 and 2020: roll-out of a field diagnosis approach in each subsidiary of the Group in order to identify the points for improvement to welcome people with disabilities;
- Every year: employee participation in the "Sports Together" charity race at the Beynost site ;

In general, EFL works to support the NGO's actions and improve its internal practices regarding professional insertion and job retention for people with disabilities.



### Scientific and industrial development

EFI Sciences, the internal training school for EFI Automotive, capitalises on and enriches the technical skills of its employees by guaranteeing high-quality training to achieve operational excellence. As a genuine performance catalyst, we develop modules adapted to our business, our organisation and the requirements of our customers. More than just a school, EFI Sciences is the driving force behind the application of our strategy and our competitive development.

In the same vein, EFI France is one of the main member companies in the "Alliance et Territoires" association in the Rhône-Alpes-Auvergne region, bringing together the main companies in the area to develop skills in the region both inside and between companies, and to encourage practices of co-development and the sharing of expertise. Through this association, the managers of the Beynost site have in particular attended a forum and workshops on agile management methods.

EFI Automotive is also actively engaged in the development of start-ups via its industrial accelerator AXANDUS, which strives to support them as best it can, both technically and industrially, in particular by giving them access to its technologies for the development of their product and mass production. As a result, EFI Automotive helps make start-ups stronger and more robust.

Furthermore, EFI Automotive focuses on creating technologies by developing technological building blocks which are used by all its establishments throughout the world for developing its product portfolio. EFI Automotive is outward-looking and possesses a strong value: sincerity. This value enables the company to form solid partnerships with third parties, giving rise to new and innovative technologies.

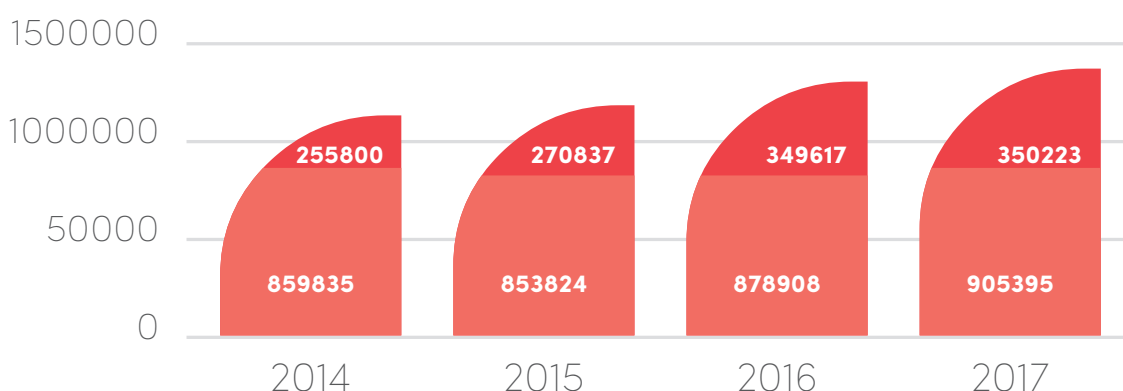


### Social assistance in a broad sense

Furthermore, as we place importance on human beings, we give a significant contribution to social projects through our company and through the Enterprise Committee.

The conditions of this contribution, and in particular the donations, are governed by our Anti-corruption conformity guide.

### Charity contribution in € (EFI)



- Employee representative committee's payment (Housing, Transport, Restauration, Leisure, Holyday)
- Company's Expenses (Transport, CE, 1% logement, Charity)



# III – A COMPANY WITH ETHICAL PRACTICES

## III.1. Sustainable Procurement

In 2018, when our Supplier Approval Questionnaire was reworked, a new chapter was added regarding safety, the environment, and the Business Continuity Plans of our suppliers. It aims to ensure that the supplier has put in place the necessary means and actions to ensure the continuity of its business in case of an accident or an event seriously disturbing its normal operation. This

chapter includes questions related to compliance with some standards and requirements by our suppliers.

This development converges with the approach begun through the Supplier Code of Conduct, which stipulates that “The Supplier must operate its businesses in an environmentally friendly way and comply with all the applicable laws and regulations in the

country of manufacture or delivery of the products or services concerned. It undertakes to continually minimise the impact of its businesses on the environment.”

Our Group is committed to paying more attention to CSR profiles when approving new suppliers in order to be coherent with its own sustainable development approach.





### III.1.1. Respect of Human Rights by suppliers

- We monitor the respect of Human Rights by our suppliers by having them sign our Supplier Code of Conduct, which binds them contractually and sets out requirements, in particular regarding:
  - A non-discrimination policy
  - A ban on forced and child labour
  - A ban on coercion and harassment
  - Remuneration and working time
  - The fight against corruption
  - Solicitation of our supplier to invite its own suppliers to comply with these requirements
- Since 2018, our Code of Conduct has formed part of the contractual documents of 100% of our purchase agreements (Nomination Letter) signed by suppliers.



### III.1.2. Supplier Ethics

- Suppliers are approved by the Supplier Panel via validation of the Approval Questionnaire by the Purchasing Department and the Supplier Quality Assurance Auditors. This enables the supplier to be evaluated according to several criteria. For that purpose, there are simple questions to find out if the supplier uses a CSR approach, for example:

Our Supplier Code of Conduct also covers these topics:

- Hygiene and safety,
- The fight against corruption,
- Solicitation of our supplier to invite its own suppliers to comply with these requirements.



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100% OF OUR NEW AND DEVELOPING SUPPLIERS ARE APPROVED  
USING THE NEW APPROVAL QUESTIONNAIRE

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### III.1.3. Product Quality

- We comply with the quality requirements guaranteed by the Supplier Quality Insurance Manual, which stipulates rules related to product traceability, suppliers' selection criteria, management of expiration dates and supplier certifications.
- We provide an insurance certificate requiring minimum financial guarantees.



- 100% of our raw materials and components suppliers are ISO 9001 v.2015 certified as a minimum.
- 40% of our suppliers and 72% of our strategic suppliers were IATF 16949 certified in 2018.



- Encourage more and more of our strategic suppliers to become IATF 16949 certified through the annual evaluation.



### III.1.4. Recycled materials

- Authorisation is given to our plastic parts suppliers to use 30% of recycled material in new materials, with some exceptions.



### III.1.5. REACH compliance by our suppliers

- The Supplier Approval Questionnaire also includes compulsory questions to find out, for example, if the supplier complies with the REACH Regulation (Registration, Evolution and Authorisation of Chemicals) and its amendments.
- 100% of our European suppliers were asked about their commitment to REACH.




### III.1.6. Policy on minerals from conflict zones

- We request a declaration regarding minerals sourced from conflict zones from suppliers of products containing gold or tin. This makes it possible to trace intermediate suppliers all the way to the raw material.
- 100% of our suppliers of products containing gold and tin sent us their certification proving that the gold and tin do not originate from conflict zones.
- Ensure our suppliers' declarations are updated on time.



## III.2. Business ethics



As a responsible company, EFL Automotive recognises that it does have competitors and works to implement fair competitive practices. EFL makes sure to maintain reliable contractual relationships, guarantee to its staff and co-contractors that it keeps their data and its own safe, and promotes a culture of social responsibility inside and outside the company.

Sincerity, internally and with our suppliers, is a strong value of our Group. To establish a relationship of mutual trust between all our points of contact, we develop means of awareness and evaluation adapted to our activity.

What's more, each employee is required to help protect the knowledge and expertise of the company. They refrain from disclosing confidential information to which they have access (e.g. studies, research, projects, organisation and direction of the Group etc.) to other members of staff who are not authorised to know this information or to third parties. Likewise, our customers' data and our own are secure and access to them is limited to the persons involved. For this purpose, we have set up several guarantees.



### III.2.1. Fight against corruption and conflicts of interest



- The appointment of a Compliance Manager and an Internal Auditor as part of the Legal and Risk Management department.
- We have set up a whistle-blower alert system with an email address (compliance@efiautomotive.com) for the reporting of any reprehensible behaviour to the Group President, the Legal and Risk Management Manager and to the Compliance Manager.
- We sanction wrongdoers in accordance with adapted disciplinary procedures and in accordance with the Labour Code, coordinated by the Human Resources department.
- We guarantee the protection of the whistle-blower with the User guide for an apparatus for professional whistle-blowing and receiving whistle-blowing reports in accordance with French Legislation.
- This alert is regulated by the User guide for an apparatus for professional whistle-blowing and receiving whistle-blowing reports in accordance with French legislation.
- We are raising awareness about the fight against corruption and conflicts of interest through:
  - The Combatting Corruption Compliance Guide attached to the Internal Regulations;
  - Accompanied by an Internal Anti-Corruption Control Standard, explaining precisely when to act, what to do and how, and which limits not to exceed;
  - A face-to-face meeting with the principal executives in the USA and China and by videoconferencing with Mexico, ensured by our internal auditor;
- Intensify training on the prevention of corruption in 2019 across the Group through e-learning for all employees with an email address and through meetings for those employees most open to the risk of corruption.



### III.2.2. Fight against fraud



- We are raising awareness about fraud in the Combatting Corruption Compliance Guide attached to the Internal Regulations.
- We use the User guide for an apparatus for professional whistle-blowing and receiving whistle-blowing reports to report fraudulent practices.
- We communicate every external fraudulent case detected (president, bank or other fraud) throughout the Group to raise awareness among the population in question of risks and good practices, continuously and across the Group.

### III.2.3. Fight against money laundering



- We fulfil our obligations towards our partners and especially our banks.
- We fulfil our obligations to declare regarding the beneficial owners (direct and/or indirect holding of more than 25% of the capital and/or voting rights and/or the exercise by all means of a power of control by the beneficial owner on the declaring company).
- We use the User guide for an apparatus for professional whistle-blowing and receiving whistle-blowing reports to report fraudulent practices.

### III.2.4 Fair competition



- We prevent anticompetitive practices with a policy formulated in the Supplier Code of Conduct that suppliers, service providers and any other co-contractors must systematically sign. Before any contracts are concluded, the risk evaluation is mostly done by the Legal Department in collaboration with sales, product managers in charge of building partnerships, and the Partnerships and External Growth Director.
- We have signed a Personal Commitment Letter regarding compliance with competition rules by every employee of every society participating in an event in 2016 that brought together several suppliers to exchange economic information on the topic of improving quality and costs as part of the manufacture of mechatronic modules.



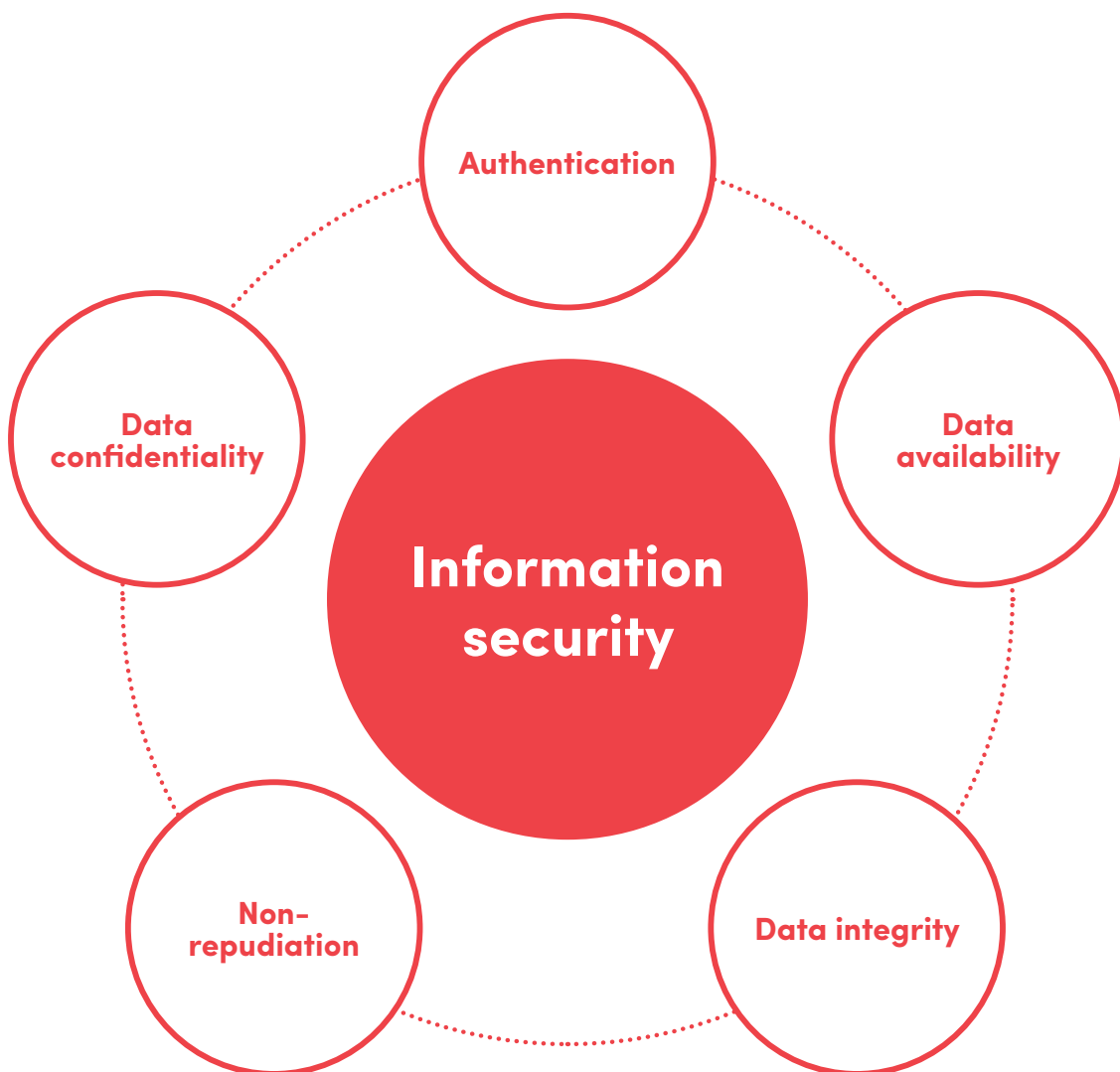
### III.2.5. Protection of identity and non-retaliation

- We protect identity and ensure non-retaliation by signature of the Supplier Code of Conduct, which commits the supplier not to retaliate against its employees. The supplier is encouraged to inform EFI's compliance officer via the dedicated email inbox in the event of an observed irregularity.
- We protect the whistle-blower's identity based on the User guide for an apparatus for professional whistle-blowing and receiving whistle-blowing reports.



### III.2.6. GDPR and data security

- We have an ongoing project to become compliant with GDPR (General Data Protection Regulation), managed by our Compliance Manager. This project includes all the stakeholders within the company who may process confidential data. We are being supported in our approach by a reputed external council and expert in this area.
- We are raising awareness about information security with periodic information as employees arrive, on EFI Voice, in EFI Mag with news on the topic, and by email and SnapComms, which is an application on all professional computers enabling communication about a security issue in case of an emergency.



**Authentication** only the authorised persons have access to the resources

**Availability** ensures access to a service or resources

**Integrity** ensures data is what it should be

**Non-repudiation** ensures a transaction cannot be denied

**Confidentiality** ensures that only the authorised persons have access to the resources exchanged



- We organise regular audits, including the «trainee audit» once a year where a person from outside the Group tries to collect data on our network without having been granted access. According to our observations, corrective action plans are set up. There is also the “external attack” audit, which consists of trying to obtain the highest possible privileged rights without previous information via the Internet.
- We consult the Confidentiality Guide, available to each employee, to know the information technology confidentiality rules.
- We have set out a new password management policy, in force since September 2018.
- We comply with the Charter on the use of information and communication systems by every employee or external natural person who intends to use the information and communication system in order to help keep it secure, and application of the Information System Security Policy as amended in the Internal Regulations, which describes the means and organisations put in place to meet the Group’s IT security objectives.

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#### INFORMATION PROCESSING THROUGH A POLICY INSPIRED BY THE ISO 27001 STANDARD ON INFORMATION SECURITY MANAGEMENT

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- Broadcast IT security segments on screens located in company common areas by 2019.
- Launch a Data Security Project which will allow the company’s non-structured data governance to be set up.



#### III.2.7. Export checks and economic sanctions

- The Compliance Manager, in collaboration with our Customs Service, follows up International Regulations regarding exportation, embargo and compliance with these regulations.

We are a certified Authorised Economic Operator (AEO), enabling the customs control protection level to be strengthened and certifying that the company fulfils certain criteria:

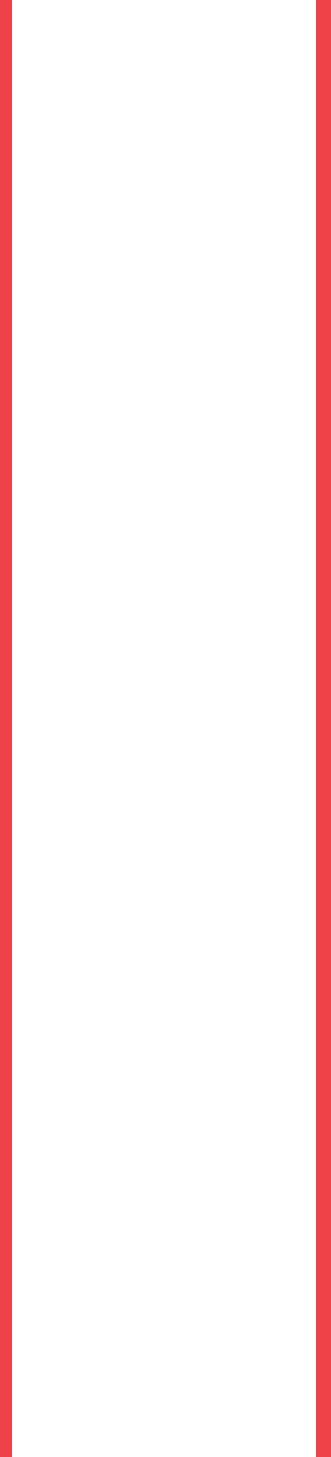
- Compliance with customs and tax legislation
- Satisfying financial solvency
- Efficient commercial records and transport records management system, allowing appropriate customs control



#### III.2.8. Intellectual property and counterfeiting

- We safeguard intellectual property with good brand portfolio management and patent portfolio management, and with the introduction of Intellectual Property clauses in all contractual documents (General Terms and Conditions of Purchase, General Terms and Conditions of Business, General Terms and Conditions of Parts Sales etc.).
- We fight against counterfeiting with the signature of a Confidentiality Agreement during the presentation of our products outside of the company.









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