

Human Rights Report

as part of the implementation of the
National Pact 'Businesses and Human Rights'

March 2025

Based on the United Nations Guiding Principles

Sommaire

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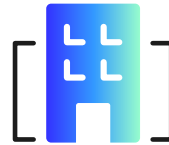
Framing Data 5

Preliminary Data



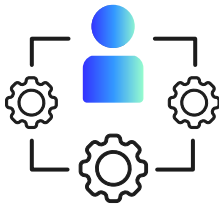
Year of reference
for this report

2024



Organization
Name

LuxTrust



Human rights
coordinator

Sophie Roberge
CSR Manager



Date of Signature
of the UN Global
Compact on Business
& Human Rights

20/09/2023



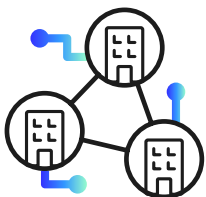
Number of Employees
in Luxembourg

115



Number of Employees
Outside Luxembourg

17



Number of
Entities Covered
by This Report

5



Name of the
entities involved

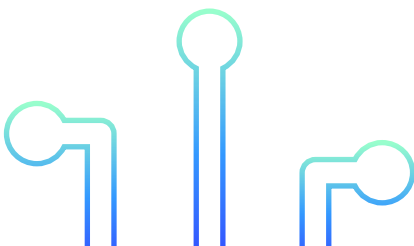
LuxTrust SA

LuxTrust France SAS

LuxTrust Monaco SAM

LuxTrust S.A. Belgique

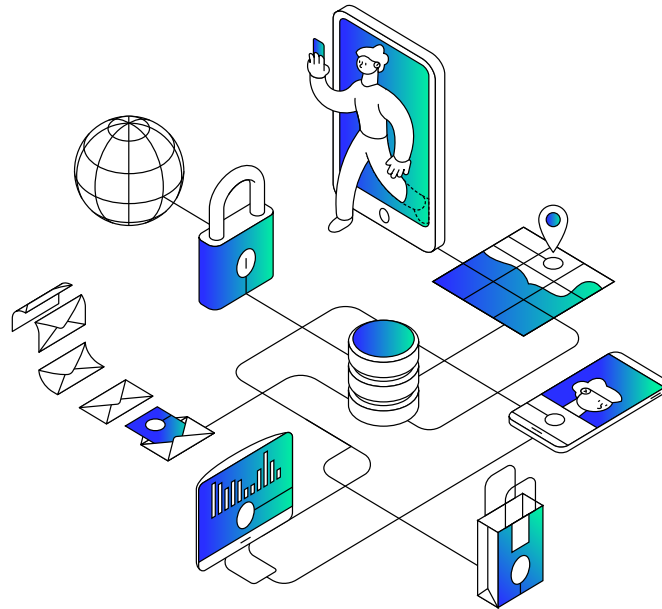
LuxTrust Maroc SàRL



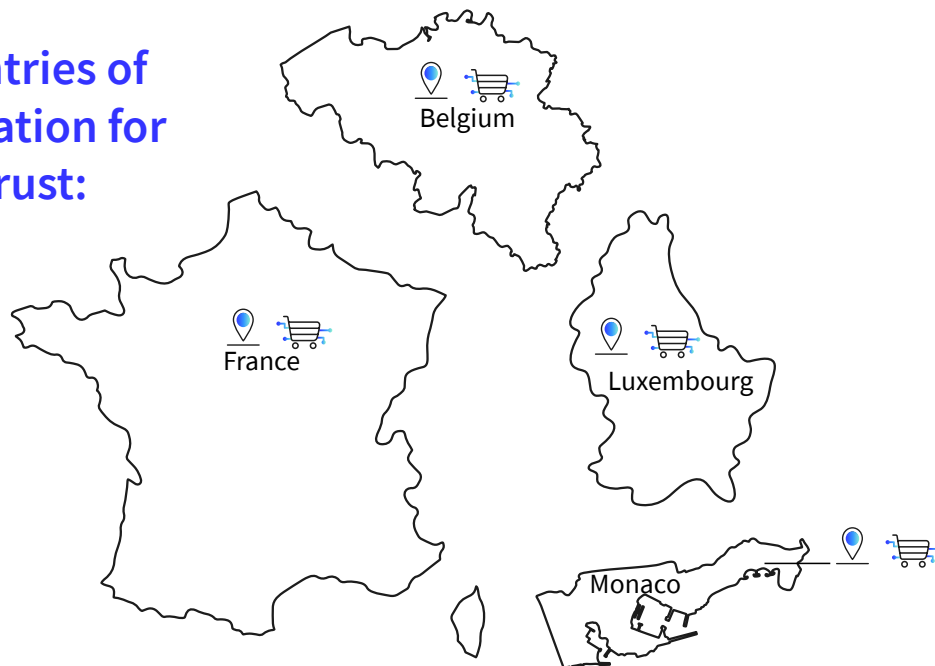
Framing Data

Sectors of activity of LuxTrust

ICT - Information and Communication Technologies Services



Countries of operation for LuxTrust:



Most important countries where **LuxTrust** operates



Most important countries where **we source** from

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Part A : Governance of human rights compliance

According to **Principle 16** of the United Nations Guiding Principles on Business and Human Rights, to anchor accountability for human rights compliance, a company must publicly express its commitment through a statement of principles that: **(a) is approved at the highest level of the company, (b) is developed using internal and/or external expertise, (c) outlines what the company expects from its staff, business partners, and other parties directly linked to its activities, products, and services in the field of human rights, (d) is accessible to the public and subject to both internal and external communication.**

A1 : PUBLIC COMMITMENT

The adoption of a human rights policy is the first important step in integrating human rights compliance into the company's values, as it will trigger the adoption and development of internal policies and procedures to fulfill this commitment. The policy communicates both externally and internally the company's minimum standard for responsible behavior, including management's expectations of how all employees and business partners should act, and it demonstrates an understanding of the risks and opportunities.

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INFORMATION AND OBJECTIVES

A1

What are your company's public statements regarding its commitment to respecting human rights?

ANSWERS

LuxTrust signed the "National Pact on Business & Human Rights" (Pacte National E&DH) as the first step in its commitment to respecting human rights.

On its website, LuxTrust declares its commitment to respecting and promoting human rights and to implementing the UN Guiding Principles on Business and Human Rights within its organization and throughout its value chain. In 2024, EcoVadis assessed LuxTrust's CSR performance and awarded a score of 70/100 for the Social and Human Rights pillar.

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INFORMATION AND OBJECTIVES

ANSWERS

A1

What are your company's public statements regarding its commitment to respecting human rights?

LuxTrust also submitted its first «Communication on Progress» to the UN Global Compact in July 2024. This document serves as an accountability mechanism since it is an annual and mandatory requirement for all signatory companies to the Global Compact. This communication describes the measures taken during the year. Chapter 5 is dedicated to human rights, highlighting the materiality of our commitments and the prevention and grievance mechanisms that have been put in place.

A Human Rights policy was developed following an analysis of our salient risks to ensure that we respect and promote universal principles that guarantee dignity for all and foster a healthy work environment and fair business practices.

Our Supplier Code of Conduct integrates human rights and working conditions requirements. This Code of Conduct notably commits suppliers to comply with international, European, and national regulations, as well as with the Universal Declaration of Human Rights of the United Nations and the conventions of the International Labour Organization (ILO).

Since 2023, LuxTrust has been a signatory of the Luxembourg Diversity Charter, which commits us to proactively combating discrimination (based on ethnicity, color, gender, language, religion, opinions, origin, etc.).

A Diversity, Equity, and Inclusion policy complements this commitment and specifies our areas of action regarding both diversity and gender equality in the workplace.

Our actions on diversity and gender equality were assessed by Bureau Veritas according to the "Gender Equality & Diversity for European & International Standard" framework, and we received a score of 4/6 for these labels.

We are also certified as a "Responsible Company" by the National Institute for Sustainable Development since October 2023, which also evaluates human rights compliance within the company and throughout its value chain. We obtained a score of 71% on the social pillar during our latest evaluation.

The first Human Rights Report, published in March 2024, illustrates the commitment of LuxTrust's Board of Directors and Executive Committee. This new report reaffirms our commitment.

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INFORMATION AND OBJECTIVES

ANSWERS

A1.1

How was the public commitment developed?

LuxTrust’s commitment to human rights was initiated by the CEO, Fabrice Aresu, who signed the National Pact on Business & Human Rights on September 20, 2023.

This commitment was approved by the Board of Directors and the *Executive Committee* (ExCo) prior to the signing.

Three working groups were formed to conduct a human rights risk analysis for LuxTrust. Each group analyzed the risks related to one of the three identified targets: employees, suppliers/partners, and customers. All ExCo members and managers dedicated to specific topics participated in this exercise. The CFO, responsible for integrating CSR strategy within the business strategy, and the CSR Manager then implemented actions to raise awareness among employees internally and to improve the mitigation of salient risks (more details in the progress plan in Section C).

A1.2

Who is the public commitment to human rights addressed to?

LuxTrust’s public commitment to human rights targets three groups of rights holders affected by its operations: employees, customers, and suppliers.

A1.2

Which human rights are mentioned in your commitment?

- Right to self-determination
- Right to life
- Right not to be subjected to torture or to cruel, inhuman, or degrading treatment or punishment
- Right not to be subjected to slavery, servitude, or forced labor
- Right to liberty and security of person
- Right of detainees to be treated humanely
- Right to freedom of movement
- Right of foreigners to a fair procedure in case of threat of expulsion
- Right to a fair trial
- Right not to be subjected to retroactive criminal legislation
- Right to recognition as a person before the law

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INFORMATION AND OBJECTIVES

ANSWERS

A1.2

Which human rights are covered by your commitment?

- Right to respect for private life
- Right to freedom of thought, conscience, and religion
- Right to freedom of opinion and expression
- Right not to be subjected to propaganda in favor of war or calls for national, racial, or religious hatred
- Right to freedom of assembly
- Right to freedom of association
- Right to protection of the family and right to marry
- Right to the protection of the child
- Right to participate in public life
- Right to equality before the law, equal protection of the law, and not to suffer discrimination
- Rights of minorities
- Right to work
- Right to just and favorable working conditions
- Right to form and join trade unions and the right to strike
- Right to social security, including social insurance
- Right to family life
- Right to an adequate standard of living
- Right to health
- Right to education
- Right to take part in cultural life and participate in scientific progress, and the right to protection of the moral and material interests of authors and inventors
- Other rights: right to a healthy environment

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INFORMATION AND OBJECTIVES

ANSWERS

A1.3

How is the public commitment disseminated?

LuxTrust publicly shared the signing of the Pact on its LinkedIn page and on its website, where the company commits to respecting and promoting human rights and implementing the UN Guiding Principles on Business and Human Rights within its organization and value chain.

Additionally, LuxTrust promotes its commitment to the Pact by displaying the letter of commitment signed by the CEO at the reception of its headquarters in Luxembourg, thereby communicating this commitment to both internal and external stakeholders.

Furthermore, this report is published on LuxTrust's website.

Progress Plan for Section A1

LuxTrust has opened a new office in Rabat, Morocco, and we will therefore update our human rights risk assessment and revise our internal policies accordingly.

We will implement a responsible purchasing policy. At the same time, the due diligence procedure for selecting our suppliers will be updated to integrate human rights issues, referencing our Supplier Code of Conduct. Awareness-raising sessions will be given to new employees to ensure the continuity of our commitment to respect human rights.

As part of LuxTrust's HR recruitment strategy, the company is committed to ensuring that all employees have an employment contract guaranteeing decent work in terms of remuneration, physical and psychological environment, tasks, and responsibilities.

A2 : INTEGRATION OF HUMAN RIGHTS COMPLIANCE

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INFORMATION AND OBJECTIVES

ANSWERS

A2

How does your company demonstrate the importance it attaches to the implementation of its commitment to human rights?

LuxTrust signed the National Pact on Business & Human Rights as the first step in its commitment to respecting human rights.

Furthermore, LuxTrust has appointed a ‘Human Rights Officer’ to implement its human rights commitment, who reports directly to the Chief Financial Officer.

Human rights are addressed and monitored through various policies and procedures, including:

- The Human Rights Policy
- Internal Rules
- HR Recruitment Strategy Policy
- Supplier Code of Conduct
- Diversity, Equity, and Inclusion Policy
- Anti-Harassment Policy
- Outsourcing Policy, specifically Chapter 3 on Supplier Selection
- Right to Disconnect Policy, Teleworking Policy
- Funeral Package

Etc.

A2.1

How are the daily responsibilities for respecting human rights organized within your company, and why?

The *Human Rights Officer* is responsible for coordinating the company’s daily human rights activities. The Human Rights Officer is a member of LuxTrust’s CSR department, which is overseen by the company’s Chief Financial Officer (CFO).

This dual role ensures effective communication with other departments responsible for managing specific human rights risks, such as the Human Resources department or the Compliance department, which includes the Data Protection Officer (DPO) for personal data.

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INFORMATION AND OBJECTIVES

ANSWERS

A2.2

What types of human rights-related issues are discussed by the executive management and the board of directors, and why?

The Chief Financial Officer (CFO) of LuxTrust participates in the human rights risk assessment and has regular discussions with the Human Rights Officer on all human rights-related matters within the company.

Additionally, all members of the Executive Committee were involved in LuxTrust’s risk assessment process.

For the client target group, the participants included: the CEO, the Commercial Director, the Legal Director, the Accounts Receivable Manager, and the After-Sales Manager.

For the employee target group, the entire Human Resources team was involved.

Regarding suppliers, the Operations and Infrastructure Director, the IT and R&D Director, the Accounting Director, and the Logistics Manager participated in the risk assessment.

The risks for LuxTrust’s new entity in Morocco were assessed for both the employee and supplier target groups, with the CFO (also in charge of Human Resources), the Rabat office manager, and the Facility Manager participating.

Moreover, the CFO reports to the Executive Committee on the progress of new regulations, including the right to disconnect law and laws regarding caregiver employees in Luxembourg, as well as actions on responsible purchasing and the Supplier Code of Conduct.

A2.3

How are employees and contractual workers made aware of how respect for human rights should guide their decisions and actions?

LuxTrust employees have received training on human rights in the workplace. This training introduced the National Pact on Business & Human Rights and human rights in the business context.

The training raised awareness among all employees about the key human rights risks that may arise within our industry.

The training was mandatory for all LuxTrust employees who could attend the informational session. Additionally, each employee has access to an HR platform where all of our policies and procedures are available, some of which refer to human rights issues, including our *Internal Rules*.

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INFORMATION AND OBJECTIVES

ANSWERS

A2.4

How does your company clearly communicate the importance it places on respecting human rights in its business relationships?

LuxTrust recognizes the importance of collaborating with all its business partners. A Supplier Code of Conduct has been developed, which directly references the importance of respecting human rights.

Additionally, the supplier selection procedure has been updated to incorporate the Supplier Code of Conduct and its compliance by third parties in the Outsourcing Policy.

A2.5

What lessons has your company learned during the reporting period about ensuring respect for human rights, and what changes have resulted from this?

During the reporting period, no human rights violations were reported.

We have created or updated several of our policies to integrate human rights issues, including:

- The Human Rights Policy
- Internal Rules
- HR Recruitment Strategy Policy
- Supplier Code of Conduct
- Diversity, Equity, and Inclusion Policy
- Outsourcing Policy, specifically Chapter 3 on *Supplier Selection*
- Right to Disconnect Policy, Teleworking Policy

Progress plan for section A2

LuxTrust recognizes the importance of regular communication with all concerned stakeholders. We aim to increase awareness among our partners and suppliers on human rights issues by continuing our efforts in dialogue with them and also raising awareness internally through the creation of a responsible sourcing policy.

Partie B : Define the reporting axis

According to **Principle 18** of the UN Guiding Principles on Business and Human Rights, in order to assess human rights risks, companies should identify and evaluate all **actual or potential negative impacts** on human rights that they may be involved in, either through their own activities or as a result of their business relationships.

Identifying and assessing actual and potential negative impacts is a crucial step to ensure an adequate human rights due diligence process. This will allow you to take appropriate actions. An adequate assessment should cover all areas of the business, across operations and relationships (including supply chains) where human rights risks are most likely to be present and most significant. The assessment should go beyond identifying material risks to the business and include risks to rights holders.

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INFORMATION AND OBJECTIVES

B1

Statement of salient issues:
Identify the salient human rights issues related to your company's activities and business relationships during the reporting period

ANSWERS

Salient HR Issues:

- Risks related to workers' health and safety - including risks related to workers' mental health.

Now referred to as: "Health and Safety Risks"

- Risks related to discriminatory practices (gender, family status, disability, age, residency, etc.) - including violence and harassment in the workplace.

Now referred to as: "Discrimination Risks"

- Risks related to privacy (for employees: issues related, for example, to remote work organization or the risk of misuse of a surveillance camera).

Now referred to as: "Privacy Risks"

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INFORMATION AND OBJECTIVES

ANSWERS

B1

Statement of salient issues: Identify the salient human rights issues related to your company’s activities and business relationships during the reporting period

Salient Client Issues:

- Risks related to customers’ privacy and personal data

Now referred to as: “Privacy Risks”

- Risks related to the health and safety of the company’s customers and consumers

Now referred to as: “Health and Safety Risks”

- Risks related to the inclusion and participation of customers

Now referred to as: “Inclusion and Participation Risks”

Salient Purchasing Issues:

- Risks related to privacy
- Risks related to forced labor and child labor
- Risks related to fair and just working conditions (working hours (e.g., pressure to work outside the contract), remuneration, breaks, etc.)
- Risks related to economic insecurity, poverty, and inadequate access to essential needs, which may compromise human well-being and dignity
- Risks related to outsourcing or value chains

B2

Determination of Salient Issues: Describe how the salient human rights issues were determined, including any contribution from stakeholders.

To determine the salient human rights issues, LuxTrust establishes an initial risk level (IRL) based on an assessment of the likelihood of the risk and its severity for the affected individuals, taking into account existing measures already in place.

The assessment of the likelihood and severity levels of a risk is carried out by representatives of the Management Committee of each targeted group. (More information on the individuals who participated in the risk assessment can be found in the response to question A2.2.

The likelihood rating scale includes four levels – rare, possible, probable, and very probable – depending on the likelihood of a rights violation occurring, and are translated into numerical data (“scores” from 1 to 4). A risk is considered (1) rare if there is one occurrence every five years or more, (2) possible if there is a possible occurrence within a 2-3 year period, (3) probable if it occurs once a year, and (4) very probable if there is more than one occurrence every year.

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INFORMATION AND OBJECTIVES

B2

Determination of Salient Issues: Describe how the salient human rights issues were determined, including any contribution from stakeholders.

ANSWERS

Regarding the severity of a risk, there are also four different levels – minor, moderate, major, critical – with corresponding numerical values (1, 4, 16, 32).

The evaluation of this level is based on various criteria, including the severity of the impact on the affected individuals. A risk is considered (1) minor if the impact is manageable for a few individuals, (4) moderate if the impacts are significant for 10% of the affected population, (16) major if the impact is significant for 50% of the affected population, and (32) critical if the impacts are significant for the majority of the affected individuals.

The likelihood and severity scores are then multiplied to highlight the most salient issues on a scale from 1 to 265 and to determine the initial risk level (IRL).

The results of the assessed risks for each group of rights holders varied considerably. Therefore, the prioritized human rights issues for each group of rights holders were based on the scores.

Salient HR Issues:

Based on this methodology, risks considered salient for the employee group are those that received an IRL score of 4 or higher.

Salient Client Issues:

For client risks, human rights issues receiving significant scores (levels 8 to 64) are considered salient.

Three issues were excluded from the evaluation of priority risks, although they could be considered to present a high risk due to the score range attributed to them. These risks are related to environmental rights, corruption, and poor stock and supplier management. These risks were excluded because they do not have a direct impact on individuals but are rather associated with risks for the company.

Salient Purchasing Issues:

For suppliers, the risk assessment revealed two significant risks with a score higher than one.

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INFORMATION AND OBJECTIVES

ANSWERS

B3 Choice of Key Geographic Areas: If your report on salient human rights issues focuses on specific geographic areas, explain how this choice was made

LuxTrust has offices in Luxembourg, France, Belgium, and Monaco, and since the end of 2024, a branch in Morocco, so it focuses its assessment of salient issues on these five countries. The majority of LuxTrust's purchases are also made in these five countries.

B4 Other Serious Incidents: Report any serious human rights incidents that have occurred or are still being addressed during the reporting period that do not relate to the salient human rights issues, and explain how they have been managed.

This question is not applicable as no major human rights incident has been identified during the reporting period.

Progress plan for part B

Although it is crucial to engage in discussions with specific rights holders, it is also recommended to examine the risks inherent in the market, industry, or sector of our suppliers. This broader approach will ensure a comprehensive identification and management of risks, without initially excluding any potential areas of concern.

Partie C :

Management of salient human rights issues

According to **Principles 19 and 20** of the United Nations Guiding Principles on Business and Human Rights, to prevent and mitigate negative human rights impacts, companies should take into account the results of their impact assessments across all relevant internal functions and processes and take appropriate actions. To verify whether negative human rights impacts have been addressed, companies should monitor the effectiveness of the measures they have taken.

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INFORMATION AND OBJECTIVES

C1

Has your company implemented specific policies to manage the salient human rights issues, and if so, which ones?

ANSWERS

LuxTrust has implemented various general and specific measures and policies to address the identified salient human rights issues.

General Policies

- **Whistleblowing Policy**

The groups of rights holders affected by this policy include all stakeholders of LuxTrust (employees from Luxembourg, France, Belgium, and Monaco, contractors, consultants, suppliers, and customers).

In December 2023, LuxTrust implemented the Whistleblowing Policy. The aim of the policy is to provide a framework for employees and other stakeholders to report any concerns or suspicions of misconduct within the organization.

With regard to salient issues, the policy mainly addresses risks related to discrimination and privacy.

The reporting system mentioned in the policy can be used to raise concerns about risks/violations of policies, including harassment or discrimination, violations related to LuxTrust’s code of conduct, privacy and data protection, and network and information system security.

See section C6 for more information on the content of the policy.

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INFORMATION AND OBJECTIVES

C1

Has your company implemented specific policies to manage the salient human rights issues, and if so, which ones?

ANSWERS

● **Internal Rules**

LuxTrust’s internal rules apply to all its employees and subcontractors and address issues related to employee health and safety protection, as well as the protection of employee and subcontractor privacy.

Regarding employee health and safety, the rules outline the requirements for building safety and specify where employees can find first aid kits in case of health issues.

The security of private information is particularly important to LuxTrust. For this reason, the internal rules policy sets out requirements for employees, management, and the IT department to ensure that all sensitive information is securely stored. For example, the policy states that the ‘IT-SYS Department’ of LuxTrust is responsible for implementing security measures to protect LuxTrust’s network, ensuring that employees’ private data is adequately protected.

● **Policies and procedures specific to salient issues**

Privacy risks

● **Data Protection Policy**

The rights holders concerned by the Data Protection Policy (in effect since 2019) include Human Resources, Clients and Consumers, and Procurement.

LuxTrust has implemented a personal data protection policy. The objective of this policy is to provide information and practical guidance to LuxTrust’s employees, consultants, or subcontractors on the company’s obligations regarding the protection of personal data and how to comply with applicable requirements, in order to remain in line with data protection laws such as the GDPR.

LuxTrust has a Data Protection Management System (DPMS), which operates in a continuous improvement mode. Internal controls are in place to monitor compliance, particularly for processing activities that present high risks to employees (e.g., video surveillance, telephone recording, etc.).

Periodic reports from the Chief Legal and Regulation Officer are submitted to the Audit Committee and the Board, outlining compliance activities and the development of the company’s maturity level.

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INFORMATION AND OBJECTIVES

C1

Has your company implemented specific policies to manage the salient human rights issues, and if so, which ones?

ANSWERS

Internal compliance monitoring periodically identifies routine non-compliances, which are easily and quickly corrected. To date, the consequences of these non-compliances have remained moderate in terms of the rights and freedoms of employees.

For suppliers who may impact privacy, we systematically conduct a risk analysis (carried out by our Security department and potentially Compliance) in order to validate suppliers and their services.

- **GDPR Governance Policy**

As part of the *Data Protection Policy*, LuxTrust has developed a GDPR governance policy. This policy specifically lists the functions that make up the GDPR governance and outlines the roles and responsibilities of each function. The communication lines are also clarified. At LuxTrust, the GDPR governance consists of the Board of Directors, an Executive Committee, a Data Protection Officer (DPO), and a Compliance Officer. The DPO is appointed and designated to the CNPD (National Commission for Data Protection).

The policy has been in effect since 2019.

- **Complaint Handling Procedure**

The complaint handling procedure applies only to clients regarding privacy and personal data. The procedure itself is an internal document designed to provide practical action plans in response to a client's questions, the exercise of their rights under the GDPR, or complaints regarding the processing of their personal data by LuxTrust. Clients and consumers have access to an email address through which they can submit a complaint.

The procedure has been in effect since 2019.

- **HR Privacy Policy**

This policy defines how LuxTrust processes the personal data of its employees, external consultants, board members, and job candidates who respond to a job posting or submit an unsolicited application. It details the types of data collected, how the data is obtained, who is responsible for it, and how it is used. The document 'HR List of Suppliers' complements this policy.

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INFORMATION AND OBJECTIVES

C1

Has your company implemented specific policies to manage the salient human rights issues, and if so, which ones?

ANSWERS

Health and safety risks

LuxTrust has implemented all the regulatory measures to ensure the health and safety of its employees at work.

An important measure was addressed to *customer care* employees (call center staff), who are particularly exposed to verbal abuse from some customers, which can cause emotional insecurity and deteriorate the mental health of our employees. To ensure the right to a safe and healthy working environment, LuxTrust has trained its employees in **stress management**, prevention, and customer relationship management.

Additionally, LuxTrust has a **safety delegate** and a **designated worker** within its organization, both responsible for health and safety at work.

There is also an **internal safety policy** that outlines all instructions to follow in the event of a fire alarm. Eight staff members have been trained to guide the evacuation process.

To address health and safety risks for our clients and consumers, LuxTrust has developed its communication by providing product and service user guides, running media campaigns on phishing risks, and improving the accessibility of its call center.

Discrimination risks

- **Internal Policy on Moral Harassment**

The policy on moral harassment applies to all LuxTrust employees and to all external stakeholders who are victims or witnesses of moral harassment by a LuxTrust employee. The policy prohibits all forms of harassment and aims to prevent workplace harassment. Behaviors that constitute moral harassment include repeated insults, threats, or excessive pressure and demands. The policy outlines preventive measures to prevent any moral harassment at work, such as raising awareness among employees and managers about the definition of moral harassment, its management methods within the company, and the sanctions that apply to perpetrators. If a case of moral harassment is raised by a victim, LuxTrust must take immediate action to stop the reported acts of harassment and conduct a swift and impartial investigation into these acts. LuxTrust must also carry out an internal evaluation of the effectiveness of preventive measures and the potential implementation of new preventive measures.

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INFORMATION AND OBJECTIVES

C1

Has your company implemented specific policies to manage the salient human rights issues, and if so, which ones?

ANSWERS

LuxTrust has also committed to the diversity charter and carries out actions with its employees.

- **Diversity, Equity, and Inclusion Policy**

The Diversity, Equity, and Inclusion Policy applies to all LuxTrust employees, anyone wishing to apply for a job at LuxTrust, or anyone wishing to report abusive behavior.

The policy is based on pillars of commitment that ensure fairness and equality in recruitment, guarantee equal pay, develop employees' employability, promote health and safety, and ensure open dialogue. This policy affirms that it prohibits behaviors contrary to its principles and commitments and reminds employees of internal contact points for any complaints, as well as an external contact point to allow any stakeholder to activate the grievance mechanism.

- **HR Recruitment strategy policy**

This document provides an explanation of the HR recruitment strategy policy for open positions within the company. It outlines the required procedures to ensure the integrity of recruitment and internal movements, focusing on hiring decisions based on technical skills rather than personal preferences.

It describes the necessary procedures to ensure the integrity of recruitment and internal movements, emphasizing hiring decisions based on technical skills rather than personal preferences, favoritism, or any form of corruption.

Risks related to customer inclusion and participation

To ensure inclusion and non-discriminatory practices for clients and consumers, LuxTrust has installed a PMR (person with reduced mobility) doorbell to facilitate assistance from receptionists.

The internal regulations require employees to exhibit exemplary behavior when welcoming each client.

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INFORMATION AND OBJECTIVES

ANSWERS

C1.1

How does your company communicate the relevance and importance of these policies to those who need to implement them?

Salient HR topics:

All employee-related policies are accessible on LuxTrust's internal server. Furthermore, they are part of the onboarding process for each employee.

Salient Client topic:

For the topic of consumer data protection, it is crucial to involve governance bodies, especially the data protection officer, in the process of implementing the policy in practice.

Client-related policies are frequently updated and shared with LuxTrust clients, either through user groups, meetings with account managers, or published on our internal website.

Progress plan for Part C1

LuxTrust will continue to work on improving its stakeholder engagement practices, with particular attention to enhancing communication with its suppliers.

ENGAGEMENT WITH STAKEHOLDERS

UNGP

INFORMATION AND OBJECTIVES

ANSWERS

C2

What is your company’s approach to stakeholder engagement for each salient human rights issue?

For its first risk assessment, LuxTrust worked with all of its departments, including Human Resources, Procurement, Customer Service, and the Executive Committee.

A double materiality analysis was conducted, and both internal stakeholders and some external ones were consulted to understand their expectations and concerns regarding key sustainability issues, as well as to gauge their commitment to human rights and the environment.

C2.1

How does your company identify the stakeholders it collaborates with for each salient issue, and what is the schedule and nature of this collaboration?

LuxTrust continues its identification of more specific rights-holder groups to strengthen their assessment of human rights-related risks. Initially, LuxTrust engaged its own employees in a training session on human rights, raising awareness of the potential risks associated with the topic.

A working group was set up to specifically address vulnerable groups, particularly focusing on clients with an “inclusion” project that involves many internal services.

C2.2

During the reporting period, which stakeholders did the company collaborate with on each salient issue and why?

For the first risk assessment, LuxTrust worked in collaboration with all of its departments.

For the second assessment, we particularly collaborated with Human Resources on their HR Recruitment Strategy Policy and with the IT Security department to reference our Supplier Code of Conduct, which was developed during the year, in our supplier selection process.

We also increased exchanges with external stakeholders, including NGOs and state or regulatory bodies, to better understand their expectations and address their questions on the accessibility and inclusivity of our products and services.

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INFORMATION AND OBJECTIVES

ANSWERS

C2.3

During the reporting period, how did stakeholder opinions influence the company's understanding of each salient issue and/or how it managed them?

Stakeholder opinions enabled LuxTrust to implement actions to meet their expectations. As a result, a new free service was introduced to educate and support our users in the context of the digitalization of our services. This program, called «Inclusion Delivery,» aims to educate, inform, and bring LuxTrust closer to people facing accessibility challenges related to inclusion.

Progress plan for Part C2

LuxTrust has expanded its stakeholder engagement efforts by integrating the opinions of a broader group of stakeholders, both internal and external, into its risk assessment process. To facilitate this, LuxTrust has organized more specific working groups dedicated to addressing human rights issues, allowing for closer collaboration and more in-depth contributions from relevant stakeholders. The goal this year is to implement the actions that have been validated by the working groups.

IMPACT ASSESSMENT

UNGP

INFORMATION AND OBJECTIVES

ANSWERS

C3

How does your company identify changes in the nature of each salient human rights issue over time?

Health and safety risks / Discrimination risks

To identify the evolution of human rights issues, Human Resources follows procedures established under the whistleblowing policy or the workplace harassment policy.

Privacy risks

Several annual reports from the Chief Legal and Regulation Officer to the Audit Committee and the Board highlight compliance activities and the evolution of the company's maturity. Internal compliance controls periodically lead to the discovery of routine non-compliances, which can then be quickly corrected and adapted.

The policy is reviewed annually.

For suppliers impacting Private Data, LuxTrust systematically conducts a risk analysis performed by the Security and Compliance departments to validate suppliers and their services.

C3.1

During the reporting period, were there any notable trends or patterns in the impacts related to a salient issue, and if so, what were they?

LuxTrust is often faced with increasingly sophisticated phishing campaigns via email, SMS, and/or phone. Fraudsters impersonate LuxTrust agents and claim that a fraudulent transaction has been made on the concerned person's bank account to obtain confidential information related to LuxTrust authentication. LuxTrust's teams, concerned about the security of its clients, warn against these fraudulent actions and provide information on best practices and how to identify a phishing attempt on its website, through media campaigns, and by dedicating a priority hotline (call center) for phishing cases.

Societal expectations are also becoming more pressing on accessibility issues.

UNGP

INFORMATION AND OBJECTIVES

ANSWERS

C3.2

During the reporting period, did it identify any serious incidents associated with a salient issue, and if so, which ones?

No incidents related to priority human rights risks occurred during the reporting period. In the event of a human rights violation, the company is committed to conducting a thorough investigation to understand the root causes and impacts.

Progress plan for Part C3

LuxTrust will develop an evaluation process to regularly monitor and assess internal processes and procedures to ensure their compliance with the ever-evolving standards and expectations related to human rights. LuxTrust ensures it stays informed about regulatory changes, industry best practices, and emerging human rights issues relevant to the company's activities. This will also be achieved through stakeholder engagement, such as with industry peers and multistakeholder initiatives.

INTEGRATION OF RESULTS AND RESPONSES

Identifying actual and potential impacts will allow you to properly prioritize your resources to prevent, mitigate, and remedy negative impacts on human rights. Establishing an appropriate governance structure to ensure that responsibility is assigned at the correct level and function, and that sufficient resources are available to implement measures, is essential for proper integration into business practices.

| UNGP | INFORMATION AND OBJECTIVES | ANSWERS |
|------|--|---|
| C4 | <p>How does your company integrate its findings on each salient human rights issue into its decision-making processes and actions?</p> | <p>Salient issues were presented to the Executive Management, and policies and/or actions were implemented. LuxTrust was evaluated by an independent third-party organization on professional equality and diversity across its Luxembourg, Belgium, and France entities.</p> <p>A working group on accessibility was created to address inclusivity issues and discrimination risks.</p> <p>Regarding supplier risks, an initial questionnaire was sent to LuxTrust’s main suppliers, and a code of conduct was developed. To facilitate its integration into internal processes, this code of conduct was incorporated into the IT Due Diligence requirements for selecting a new supplier.</p> |
| C4.1 | <p>How are the company’s departments, whose decisions and actions may affect the management of salient issues, involved in the research and implementation of solutions?</p> | <p>The different departments responsible for each group of rights holders (Human Resources, Customers, and Procurement) are involved in the risk assessment process. They determine the likelihood and severity of each risk. The implementation of solutions is led by the CFO, involving all relevant departments.</p> |
| C4.2 | <p>When tensions arise between preventing or mitigating impacts related to a salient issue and other company objectives, how are these tensions managed?</p> | <p>No tensions are to be reported for this exercise.</p> |

UNGP

INFORMATION AND OBJECTIVES

ANSWERS

C4.3

During the reporting period, what measures did the company apply to prevent or mitigate the potential impacts associated with each salient issue?

During this period, LuxTrust continued its measures to mitigate a risk, which is phishing emails mentioned earlier (C 3.1). In response to increasingly sophisticated phishing campaigns, LuxTrust had implemented several communication strategies to inform its clients. The communications aimed to educate on the best practices to adopt in case of a phishing incident (media campaigns and information on our website).

Furthermore, during this period, LuxTrust went further by launching a program called *'Inclusion Delivery'*, which was designed following discussions with NGOs on digital inclusion forums and the Part and Act program of IMS. LuxTrust agents organized training and information sessions within associations to explain LuxTrust products and services (especially in the context of token decommissioning) and assist elderly individuals, refugees, or anyone with specific needs in accessing LuxTrust services (app or scan).

Since the program's launch in October 2024, LuxTrust has worked with 7 associations and municipalities, conducting 12 presentation and support sessions, helping over 220 individuals.

Progress plan for Part C4

LuxTrust plans to continue developing specific action plans for each risk issue identified as salient. In preparing these strategic action plans, LuxTrust acknowledges the importance of clearly defined objectives, measurable targets, and key performance indicators to effectively track progress. Continuous monitoring mechanisms will be established and periodically reviewed to adjust policies, objectives, and actions in line with the evolving human rights regulatory landscape.

PERFORMANCE MONITORING

According to the UN Guiding **Principle 21** on Business and Human Rights, in order to report how companies address their impacts on human rights, companies should be ready to communicate information externally, especially when concerns are raised by affected stakeholders or on their behalf.

UNGP

INFORMATION AND OBJECTIVES

C5

How does your company know if the efforts it deploys to address each salient human rights issue are effective in practice?

ANSWERS

Control indicators are crucial for monitoring the effectiveness of the measures put in place by LuxTrust to prevent human rights risks. They provide measurable data points that allow an objective assessment of progress and results over time. In addition, these indicators will help demonstrate accountability to stakeholders and ensure that human rights considerations remain at the heart of LuxTrust's business operations and decision-making processes

LuxTrust has already established key control indicators (KCI), including:

Key Human Resources Topics

Health and Safety Risks

- Employee Net Promoter Satisfaction indicator
- Number of conflicts with a client or end user
- Number of whistleblowing procedures initiated

Discrimination Risks

- Number of complaints or grievances

Salient Client topic

Risks related to privacy and personal data

- PEN Testing and Certification

Risks related to the health and safety of clients and consumers of the company

- Call Center KPIs

In 2024, we did not carry out any media campaigns on the subject. We conducted one in December 2023, and a national campaign with key industry players is planned for 2025.

UNGP

INFORMATION AND OBJECTIVES

ANSWERS

C5

How does your company know if the efforts it deploys to address each salient human rights issue are effective in practice?

Risks related to client inclusion and participation

- Number of clients attending meetings
- Number of entities supported in inclusion delivery
- Number of individuals trained or supported by a member of Customer Care in the context of inclusion delivery

Salient purchasing topic

Risks related to privacy

- Percentage of suppliers who have signed the Responsible Employer – Supplier Charter

LuxTrust plans to regularly monitor these indicators in order to assess the effectiveness of the measures.

C5.1

During the reporting period, what examples illustrate the effectiveness of managing the salient issues?

As mentioned above, certain indicators already exist for the human rights issues identified as salient.

We track complaints related to personal data, claims made to customer care, and harassment alerts. Decision-making flowcharts are also implemented.

Progress plan for Part C5

LuxTrust is developing action plans to address the salient human rights issues. LuxTrust intends to regularly evaluate its actions and publish the results in the human rights report.

REPARATION

According to **Principle 29** of the UN Guiding Principles on Business and Human Rights, for grievances to be addressed promptly and subject to direct corrective measures, businesses should establish or participate in effective grievance mechanisms at the operational level for individuals and communities that may be harmed. An effective grievance mechanism is a crucial tool for the subsequent identification of negative human rights impacts, as it allows you to identify potential negative impacts in a timely manner. It can also help establish good relationships with your stakeholders, as it shows that you are aware and serious about the possibility of negative impacts occurring despite the processes in place, and that there is a proactive approach to address them if they do occur.

UNGP

INFORMATION AND OBJECTIVES

C6

How does your company enable effective remedy if individuals are harmed by its actions or decisions related to the salient human rights issues?

ANSWERS

Human rights grievance mechanisms have been specifically implemented in certain policies and procedures, providing guidance on how LuxTrust intends to respond if a complaint is filed or if an individual is harmed.

The Whistleblowing policy, initiated at the end of 2023, and the customer complaints handling procedure include the most developed grievance mechanisms. The human rights policy has been added to complement these.

Whistleblowing Policy

LuxTrust ensures an effective resolution of any complaint raised under the Whistleblowing procedure.

The 'Regulatory & Compliance' department verifies whether the measures have been implemented and if the situation has been resolved 3 to 6 months after the closure of all stages of the whistleblowing process.

Complaint Handling Procedure

Regarding data privacy, LuxTrust has established an effective process for handling and managing complaints submitted by clients and users. LuxTrust has a period of one to three months, depending on the request, to inform clients of the measures taken to address their complaint. When LuxTrust is unable to take action (for example, if a client or user cannot be identified), alternatives are provided to users to file a complaint with a supervisory authority and seek legal recourse.

For clients, the only salient issue applicable is data privacy.

UNGP

INFORMATION AND OBJECTIVES

ANSWERS

C6

How does your company enable effective remedy if individuals are harmed by its actions or decisions related to the salient human rights issues?

Human Rights Policy

LuxTrust provides several channels for reporting any unethical behavior, illegal activities, or violations of this policy, both internally and externally. The main contact method is the dedicated email address: sustainability@luxtrust.lu, through which a specialized team handles reports in a strictly confidential manner.

Anonymous suggestion boxes are also available at the reception of our premises, primarily for internal employees. Reports received through this channel are handled by the Human Resources team.

Additionally, a reporting channel is available on our website, accompanied by a dedicated policy (Whistleblowing Policy) that outlines the procedures for handling anonymous or confidential complaints, while ensuring the protection of whistleblowers from any form of retaliation.

C6.1

How can your company receive complaints or claims related to each of the salient issues?

LuxTrust has established an official grievance channel for all human rights-related issues via the email address: sustainability@luxtrust.lu. Additionally, there are other processes in place that allow stakeholders to file complaints and/or report issues and risks.

Human Rights Office

The Human Rights Officer can be contacted via email (sustainability@luxtrust.lu) for any questions or complaints specifically related to human rights issues.

Other policies and procedures exist at LuxTrust, but they are not specific to human rights:

Whistleblowing Policy

The whistleblower has the choice to report illegal behavior either through a dedicated internal channel or directly to the relevant authorities via an external channel. For the internal channel, whistleblowers can send a 'Reporting Form' by email or mail to dedicated addresses. If a whistleblower believes the internal process has not adequately addressed the issue, they can contact external authorities, such as regulatory bodies or law enforcement agencies.

Additionally, for the issue of risks related to customer data privacy and protection, a dedicated email address (dpo@luxtrust.lu) has been created for this purpose.

UNGP

INFORMATION AND OBJECTIVES

C6.2

How does your company ensure that people feel capable and authorized to file a complaint or grievance?

ANSWERS

Through its ‘open door’ principle, LuxTrust fosters open dialogue so that employees feel secure enough to voice their concerns. In addition, issues can also be addressed directly to the Human Rights Officer and through the dedicated channels for specific policies mentioned below.

Employees have various mechanisms to make a report. They can contact the HRBP, their manager, a member of the ExCo, the DPO, a member of the staff delegation, or use an anonymous mailbox in the Luxembourg offices. For other locations, the dedicated Whistleblowing Policy outlines the procedures for handling anonymous or confidential complaints.

Whistleblowing Policy

LuxTrust ensures that whistleblowers feel safe to report any complaints and guarantees the possibility of raising any issue anonymously and confidentially by mail to a dedicated address (whistleblowing@luxtrust.lu). Furthermore, if the whistleblower decides not to remain anonymous, they are guaranteed protection and cannot face retaliation. Throughout the investigation and thereafter, all members of the ‘Regulatory & Compliance’ department are bound to confidentiality.

Complaints Handling Procedure

For confidentiality and client data information, communication is essential. LuxTrust’s managers are required to respond and inform the client within one month (three months maximum depending on the case) regarding the actions taken concerning their request or complaint. When no action can be taken, alternative solutions are communicated to the client.

UNGP

INFORMATION AND OBJECTIVES

ANSWERS

C6.3

How does your company handle complaints and evaluate the effectiveness of the outcomes?

Depending on the nature of the complaint, LuxTrust has various strategies to handle the complaint and evaluate the effectiveness of the outcomes.

Whistleblowing Policy

After receiving information through the aforementioned channels, the 'Regulatory & Compliance' department conducts an initial review to determine whether the reported disclosure falls within the scope of the policy. If so, an investigation into the reported disclosure is conducted. If the department is in a conflict of interest, it will be excluded from the procedure, and the case will be transferred to another department.

The relevant department then investigates the matter by organizing one or more meetings with the whistleblower and prepares a report. The department then proposes and implements the necessary actions to address the reported issue. To verify the effectiveness of the process, the 'Regulatory & Compliance' department checks the measures taken after 3 to 6 months and determines whether the situation has been resolved.

Complaints Handling Procedure

The complaint management procedure outlines who is involved in the initial process and to whom the request should be escalated. Additionally, it also covers various rights related to data confidentiality and provides two alternative scenarios – where action is possible and where action is not possible.

Customer complaints on this subject must be handled promptly, and when LuxTrust is unable to take action, customers are encouraged to seek external support to address the complaint and obtain remedy.

C6.4

During the reporting period, what trends and patterns characterized the complaints or claims and their resolutions related to each salient issue, and what lessons has the company learned?

N/A - no cases have been recorded yet.

UNGP

INFORMATION AND OBJECTIVES

ANSWERS

C6.5

During the reporting period, did your company provide or facilitate recourse for actual incidences related to a salient issue, and if so, can you provide representative examples?

N/A - no cases have been recorded yet.

Progress plan for Part C6

A whistleblowing policy is not the equivalent of a grievance procedure or claims mechanism under UNGP 31. LuxTrust has implemented its human rights policy and outlined various specific alert and complaint mechanisms in managing human rights risks within the company. LuxTrust has also developed specific mechanisms for considering human rights by its suppliers across its supply chains and still needs to enhance its dialogue with these specific stakeholders to improve risk management and the mitigation or resolution of potential complaints.

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