

COMPAGNIE CHARGEURS INVEST
MODERN SLAVERY STATEMENT 2024
CORPORATE STATEMENT



**COMPAGNIE
CHARGEURS
INVEST**

About this statement

“Compagnie Chargeurs Invest SA”¹ refers to the French public limited company (“société anonyme”) registered with the Paris Trade and Company Register under the SIREN number 390 474 898, with its registered office at 7 rue Kepler, 75016 Paris, listed on the Paris Stock Exchange. “The Group”, “Chargeurs Group”, and “Chargeurs” all refers to Compagnie Chargeurs Invest and all the entities directly or indirectly controlled by Compagnie Chargeurs Invest.

This statement is also made on behalf of the following subsidiaries of Compagnie Chargeurs Invest : Chargeurs Films de Protection SAS (SIREN number 885 582 072), Chargeurs PCC Corporate (SIREN number 809 008 725), Chargeurs Museum Studio (SIREN number 840 419 055), Chargeurs Wool Holding GmbH (SIREN number 477 080 592), Fournival Altesse (SIREN number 487 577 462), Chargetex 39 (SIREN number 908 724 529), Cambridge Satchel France (SIREN number 842 202 749), The Cambridge Satchel Company Limited (company number 06763257), Rayne Shoes Limited (company number 06859016), and Swaine Group Limited (company number 13574977) and the actions and operations set out below are effective across The Group.

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015. It sets out the steps we have taken during the financial year 2024 (i.e., the year ending on December 31, 2024) to identify and prevent modern slavery – including forced labor, human trafficking, and child labor – from taking place in any part of our business activities or within our supply chains. Compagnie Chargeurs Invest’s definition of slavery and human trafficking is aligned with the *Modern Slavery Act 2015*².

¹ “Chargeurs SA” became “Compagnie Chargeurs Invest SA” in April 2025

² Under the UK *Modern Slavery Act 2015*, “modern slavery” encompasses slavery, servitude, forced or compulsory labour, and human trafficking. These offences involve the deprivation of a person’s liberty for the purpose of exploitation, through coercion, threat, deception, or abuse of power or vulnerability – regardless of the person’s consent. These definitions are set out in Sections 1 and 2 of the Act and are to be interpreted in accordance with Article 4 of the European Convention on Human Rights.

Table of Content

Introduction	4
1- About Compagnie Chargeurs Invest	5
1.1- Global champions in niche businesses	5
1.2- Group operations	6
1.3- Group supply chain	6
2- Sustainability governance	7
2.1- Board of Directors and Executive Management	7
2.2- CSR Department and Committees	8
2.3- Operational management teams	8
3- Sustainability due diligence process	8
3.1- Risk assessment update and stakeholder engagement	8
3.2- Policies related to human rights	10
3.3- Measures taken to mitigate modern slavery risks	10
3.3.1- Social measures	10
3.3.2- Governance-related measures	11
4- Group 2025-2026 action plan regarding human rights	12
2025	12
2026	13

Introduction

The Chargeurs Group has always been and will remain to be, committed to treating everyone in its business with dignity and respect.

Modern slavery is unacceptable in our business and supply chain. We have a great responsibility to protect and respect human rights for all in our operations. We welcome the increase in global legislation on mandatory human rights due diligence as we see the great value in public accountability for businesses across all sectors.

This year marks our third Modern Slavery Statement, highlighting the advancements we have made over the past year in strengthening our systems to prevent modern slavery within our supply chain and operations, and in addressing priority risks.



This statement was approved and signed by Michaël Fribourg, Chairman and Chief Executive Officer of Chargeurs Group on 23rd July 2025. This statement was also signed and approved by Joëlle Fabre-Hoffmeister, Secretary General of Chargeurs on the same date. This statement sets out the steps taken by the Chargeurs Group by the financial year 2024 and first semester 2025.

Joëlle Fabre-Hoffmeister shared:

« More than ever, we need to protect human rights along the value chain and feel accountable for the respect of every of our employees or contacts we interact with. This was at the core of Chargeurs values, and remains our guideline in Company Chargeurs Invest »

1- About Compagnie Chargeurs Invest

1.1- Global champions in niche businesses

Compagnie Chargeurs Invest is a world leader in bespoke industrial services operating in niche markets and offering integrated, high value-added solutions to its B2B and B2C customers.

Key figures

- Nearly 2,600 employees
- Active in 5 continents and almost 100 countries
- 20 production facilities
- 729.6 M€ revenues

The Group is supported by the long-term commitment of Groupe Familial Fribourg, a fully dedicated and engaged shareholder. Its portfolio is structured into three strategic platforms, and five (5) businesses:

CULTURE & EDUCATION	FASHION & KNOW-HOW		INNOVATIVE MATERIALS	
				
Museum Studio	Chargeurs PCC	Luxury Fibers	Personal Goods	Novacel
World No.1 in cultural engineering and production	World No. 1 in technical interlining for the luxury and fashion industries	World No.1 in traceable natural fibers trading	Premium personal accessories	World No. 1 in industrial process films
€140.1m in revenue in 2024	€202.8m in revenue in 2024	€74.4m in revenue in 2024	€13.6m in revenue in 2024	€297.2m in revenue in 2024
400 employees	1,200 employees	50 employees	150 employees	800 employees
				

The different Business Units are organized as follows:

Museum Studio is a world leader in cultural engineering and production, offering a range of services and expertise for museums, foundations and brands. It has the ambition of creating unforgettable visitor experiences.

Chargeurs PCC leads the global interlinings market, supplying technical products essential to womenswear and menswear collections for major ready-to-wear brands.

Luxury Fibers supplies the finest wool fibers in the world. Leveraging its proprietary traceability technologies, it is a leading traceable and sustainable wool supplier for fashion brands.

Personal Goods brings together and showcases exceptional expertise in high-end personal accessories segments.

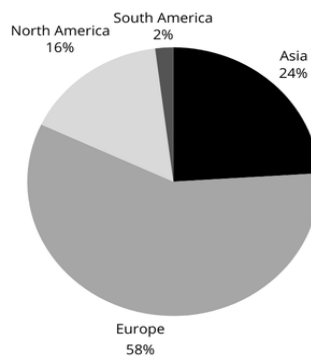
Novacel offers the most extensive range of high-tech industrial process films on the market, designed to protect materials prior to their processing or manufacturing, and covering the construction, industrial equipment, and household appliance sectors.

1.2- Group operations

Compagnie Chargeurs Invest counts over a hundred service centers and points of sales across five continents, usually under leased contract.

The Group also directly manages its operations through its 20 production sites, fully owned, representing about 50% of employees and established across Asia, Europe, North America, and South America.

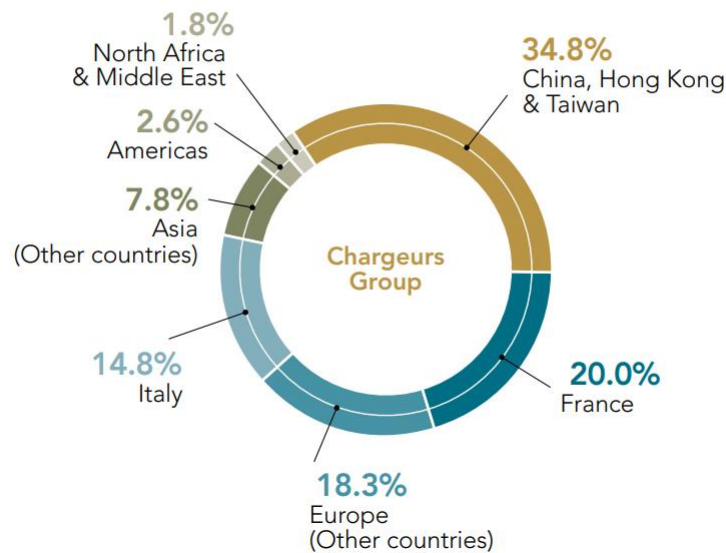
Employees in production sites by continents



1.3- Group supply chain

The business is also supported by a network of suppliers worldwide, from which a majority are long-term partners of the Group. For now, the Group is managing in priority Tier 1 suppliers, except for Luxury Fibers' team who has contact with every actor across the Supply Chain.

GEOGRAPHICAL BREAKDOWN OF SUPPLIERS IN CHARGEURS BUSINESS LINES



3

Chargeurs PCC operates in the textile sector. A majority of its Tier 1 suppliers are in Asia.

Novacel's tier 1 suppliers are limited and mainly in North America, Europe and Asia.

Luxury Fibers' main tier 1 suppliers are limited and located in South America and Asia.

These three Business Units above represent the most significant portion of the Group's purchases and a higher risk of human rights violations.

Museum Studio has a wide range of needs regarding purchases, with a wide range of tier 1 suppliers located mainly in Europe and North America.

Personal Goods' tier 1 suppliers are limited and located mainly in Europe.

2–Sustainability governance

2.1– Board of Directors and Executive Management

The Board of Directors defines multi-year CSR⁴ strategic guidelines with the support of Executive Management and the Group's CSR Department, which ensures their implementation. It annually reviews the results obtained and assesses the opportunity, if necessary, to adapt the action plan according to the Company's strategy, the expectations of stakeholders and the Company's economic capacity to implement it.

In terms of CSR, the Board of Directors relies mainly on the following three committees.

- 1– Sustainability Strategy Committee (created in 2024)
- 2– Audit Committee

³ Mapping carried out on the scope of Novacel suppliers (146 suppliers for European plants, i.e. 80% of global production), Chargeurs PCC (696 suppliers for plants worldwide, except entities located in South America) and Luxury Fibers (5 suppliers) in 2023. There were no major changes in 2024.

⁴ CSR stands for Corporate Social Responsibility, which covers all topics related to sustainability, i.e. Environment, Social and Governance (ESG).

3- Ethics Committee

The Sustainability Strategy Committee conducted the following activities last year:

- Recommendation for the selection of a sustainability auditor.
- Review of the Group's CSR strategy, the double materiality matrix, and the climate transition plan.
- Choice of CSR training for the Board of Directors.

Executive Management presents to the Board of Directors the CSR objectives and action plans. It informs the Board of the results obtained on an annual basis. The Deputy Chief Executive Officer / General Secretary oversees the implementation of the CSR strategy in the various business lines.

2.2- CSR Department and Committees

The CSR Department structures and coordinates the Group CSR strategy for the business lines. It defines the associated short-, medium- and long-term objectives, consolidates the reporting and ensures the Group's representation vis-à-vis rating agencies, banks and other relevant stakeholders. It reports to Executive Management and collaborates with all relevant stakeholders and contributors.

A CSR Steering Committee is composed of expert operational representatives (including Production, Purchasing, Human Resources), to ensure the identification and assessment of the evolving or new impacts, risks and opportunities and ensure the integration of the decisions into the business processes.

A global CSR network has been set up within the five business lines. This team oversees the CSR roadmap implementation and quality data reporting. They manage the CSR priorities according to each business.

2.3- Operational management teams

Sustainability management is decentralized. Each BU establishes its own CSR objectives in line with the policies and objectives established by the Group. The CEOs of BU are directly involved in CSR commitments. They oversee the implementation of the Group's sustainability strategy and spread the CSR culture. Since 2019, CSR criteria have been integrated into the compensation system for executives and managers. They apply to 100% of Compagnie Chargeurs Invest managers, around 215 people.

3- Sustainability due diligence process

Under the French Sapin II law, and in anticipation of the transposition of the new European Directive on due diligence⁵, the Group continued in 2024 its efforts to integrate essential elements of due diligence.

The objectives are to continuously update the identification of risks, and to prevent and mitigate any negative impacts, real or potential, on people and the environment arising from the Group's own activities ("Operations") and those of its business partners, both upstream and downstream ("Value chain").

3.1- Risk assessment update and stakeholder engagement

In 2024, the Group updated its Impacts, Risks and Opportunities assessment, as required by the EU

⁵ CS3D – Corporate Sustainability Due Diligence Directive, adopted in April 2024

Directive, CSRD⁶, following the double materiality approach:

- Financial materiality of sustainability issues affecting the Group's performance and results.
- Impact materiality of our business on society, the environment and stakeholders.

To carry out this assessment, we carried out three actions:

1. Conduct a wide-ranging sectoral documentary analysis.
2. Engage in dialogue with 50 key stakeholders from two main groups: those impacted by the company's activities (customers, suppliers, etc.) and the internal experts.
3. Organize final interviews with the General Management and CSR teams.

This work revealed that, out of the 37 sub-issues related to sustainability (according to CSRD definition), 29 sub-issues were material for our Group. And as far as human rights issues are concerned, the top 5 risks today are as follows:

1. *Working conditions of our workforce*
2. *Pollution risk management*
3. *Climate change adaptation*
4. *Working conditions of workers in the value chain*
5. *Water management*

As a result, if we consider more specifically the problematic of modern slavery⁷, the working conditions of employees associated directly or not with our business are material to our Group.

The reasoning behind this materiality is linked to various considerations, among which the geographical location of our business and sectoral risk are paramount. It should be noted that, to date, our Group has never been directly involved in a human rights controversy.

Here below, as part of our due diligence process, continuous stakeholder engagement is also a central process to be informed in case of human rights impacts or risks:

Stakeholders	Expectations from the Group	Information and dialog methods
Employees (current and future)	Health, safety and quality of life at work Equity, social and trade union rights Diversity Training, employability, career development Recognition at work, compensation	Various HR and prevention policies Code of Ethics Group Works Council with social partners Annual interviews, service meetings, Company newspaper Social surveys Alert mechanism
Suppliers and subcontractors	Robust governance Sustainable innovation capabilities Responsible value chain	General conditions of purchase Responsible purchasing policy CSR performance assessments Technical and commercial meetings Alert mechanism
Civil society, local communities	Support for local economic development Dialog, transparency Compliance with regulations, labor rights, human rights, occupational health Preservation of the environment	Website and publication Alert mechanism Support for local associations

Source: 2024 Annual report

⁶ Corporate Sustainability Reporting Directive

⁷ Modern slavery includes but is not limited to human trafficking, forced labor and debt bondage

3.2- Policies related to human rights

As member of the UN Global Compact since 2017, the Group is committed to:

- Support and respect the protection of internationally proclaimed human rights.
- Ensure we are not complicit in human rights abuse such as:
 - Uphold the freedom of association and the effective recognition of the right to collective bargaining.
 - Uphold the elimination of all forms of forced and compulsory labor.
 - Uphold the effective abolition of child labor.
- Support a precautionary approach to environmental challenges and undertake actions to promote greater environmental responsibility and the development of environmentally friendly technologies.
- Work against corruption in all its forms, including extortion and bribery.

The Group does have several policies that relate to potential “modern slavery” challenges:

Code of Conduct	Signed by 100% of our employees sets out our commitments to several international human rights standards, including the Universal Declaration of Human Rights and the United Nations (UN) Guiding Principles or the International Labor Organization (ILO) Conventions.
Sustainable Purchasing Charter	Entirely renewed in 2024, explains for our partners the Group commitments and stipulates control and audit procedures, alongside with sanction measures. Since its date of issuance, each business unit is currently asking their suppliers to sign the new version.
Diversity and Inclusion Policy	Integral part of our broader human resource strategy. By promoting fair treatment, equal opportunity and respect for all individuals, we aim to reduce vulnerabilities that can lead to exploitation or forced labor.
Health and Safety Policy	Reference document that supports our efforts against modern slavery by ensuring safe and respectful working conditions throughout our operations and promoting a culture of protection and accountability.
Whistleblowing and grievance mechanism	Process allowing the workforce, suppliers, clients to report any suspicions of ethical violations. The report is then escalated to the Group Chief Compliance Officer and followed by an internal investigation and action.

3.3- Measures taken to mitigate modern slavery risks

3.3.1- Social measures

The Group ensures implementation of social protection and wage structures above legal obligations wherever it is possible and considers necessary to allow a decent life for our workforce. In 2024, actions have been taken in Spain, UK and a few Asian countries.

Health and Safety remains an absolute key priority for the Group. In 2024, a new Global Safety Day was organized across all countries and sites. It mobilized 1 488 employees during one or several days around the theme of first aid. In 2024, 13 328 hours of training were devoted to safety.

To ensure the workers have various paths to share their views, the business units Novacel and Museum Studio carried out annual employees' surveys through their partner, *Great Place To Work*, to assess employee satisfaction and well-being.

And as far as Luxury Fibers BU is concerned, the Group Charter and specific human rights clauses are systematically integrated into its suppliers' contracts. Furthermore, Luxury Fibers' NATIVA™ Regen protocol provides support not only to farmers but also to their surrounding communities. By enabling access to education, skills, and economic autonomy, initiatives such as "Women in Wool" and "Siento Lana" help prevent conditions likely to give rise to modern slavery risks.

3.3.2- Governance-related measures

On a regular basis, the Business Units (BU) conducted meetings with their key suppliers around CSR topics, for instance in China by PCC teams around the new Sustainable purchasing Charter.

In 2024, *Compagnie Chargeurs Invest* conducted audits of its own production facilities and suppliers' sites, by internal teams or via the SEDEX and EcoVadis platforms.

- Regarding its own sites, the Group regularly conducts internal controls and audits to ensure adherence to procedures. A dedicated team is in charge to conduct them.
- Regarding the suppliers' sites, three BU have defined their respective key suppliers, representing more than 50% of purchases in value. This group was composed of 118 suppliers in total last year.

Business Units	Number of tier 1 key suppliers	Number of tier 1 suppliers audited or evaluated by a recognized external organization	% of audited suppliers in tier 1 key suppliers
Chargeurs PCC	84	54	64 %
Novacel	30	20	67 %
Luxury Fibers	4	4	100 %
Total	118	78	66 %

In the year 2024, the audit and evaluation processes found no signs of forced labor.

Beyond audits, BU supports their partners through regular visits and follow-up in case of non-conformities raised during audits, while ensuring continuous improvement.

On-site meetings, sometimes unannounced, provide opportunities to promote responsible sourcing, and listen to suppliers' needs. This collaborative approach helps to co-build an ethical value chain while fostering trust and transparency with all stakeholders.

As far as the verification framework is concerned, the BU are today using three different standards:

SMETA⁸ audits	Covering key CSR-social oriented pillars—working conditions, health and safety, and business ethics—ensure rigorous operational oversight of the company's commitments. These audits are conducted on a voluntary basis, but the Group is fostering they are completed by explaining the rationale. Over the past years, PCC's production facilities have been audited as a priority, and PCC requests also an audit from all its key suppliers. In 2024, 78 % of purchasing volume comes from SMETA-
---------------------------------	---

⁸ SMETA stands for Sedex Members Ethical Trade Audit.

	audited suppliers, reinforcing the reliability and sustainability of the supply chain (compared to 64 % in 2023).
EcoVadis evaluations	Used by Novacel for the first time in 2024 to better meet the needs of its business partners and align its practices with those of the chemical and materials industries. Novacel itself – supported by Group elements – was awarded a silver medal, highlighting its position among the top 15% of the most responsible plastic product manufacturers. This BU has a limited number of important suppliers, which enables it to cooperate extensively with them regarding CSR issues. In 2024, 45% of its purchases were made from suppliers evaluated by Ecovadis.
NATIVA audits	Value chain management is the added value of Luxury Fibers through the NATIVA™ label, which guarantees traceable merino wool. A proprietary blockchain technology ensures traceability and sourcing across the entire value chain. Each link in the certified NATIVA™ value chain must comply with and be audited against the principles defined in its CSR protocols concerning animal welfare, land management, industrial standards and corporate social responsibility. At the farm level, 29 indicators relate to human rights as well as the health, safety, and welfare of workers. At the industry level, 22 indicators address these issues. In 2024, Luxury Fibers worked continuously with 4 combing factories (Tier1 suppliers) and 314 farms (Tier 2 suppliers) worldwide. All these business partners (100%) were audited by independent third-party organizations, such as Control Union, or ICEA ⁹ .

4- Group 2025–2026 action plan regarding human rights

2025

Value chain	Objectives	Audience	Actions	KPI	Target by 2030
Own operations	Promote gender diversity	All workforce	Promote women in management positions, D&I Policy (2024)	% of women in management position	40% (24% in 2024)
	Protect workforce health & safety	All workforce	Maintain continuous improvement in the Safety management system	Accident frequency rate # of employees covered with safety management system	(close) to zero accident
	Ensure workers' voices are heard	Novacel, CMS & PCC	Generalize "Great Place to Work" / "Zest" Surveys	% of workers engaged (equivalent "trust index")	80% (69% in 2024)
	Promote social protection	Spain, UK & Asia teams	Increase social protection when relevant	Health protection rate	80% (70% in 2024)
Outside own operations	Prevent human rights risks	All interested parties (internal, external)	Code of conduct, alert system	# of claims case	To be defined
	Ensure our suppliers are aligned with our standards	Sourcing & procurement teams	Implement Sustainable Purchasing (new) Charter Conduct audits of suppliers	# of suppliers which signed the Charter % of audited suppliers	To be defined
	Collaborate with peers to reinforce impact	External interested parties	Participation to Global Compact working group on human rights, various Textile forum, etc.	# joint event	To be defined

⁹ Istituto per la Certificazione Etica e Ambientale.

2026

Value chain	Objectives	Audience	Actions	KPI	Target by 2030
Own operations	Disclose a policy about human rights	All workforce	Prepare and submit to teams a project of policy presenting a shared vision	% of workers trained on the human rights policy	100%
	Establish common approach to assess human rights risks, including in value chain	Group and value chain	Ensure all BU conduct risk assessment, based on Group guidelines	# BU that have conducted a human right risk assessment	100%
	Address specific risks	BU	Develop BU action plan	# BU with action plan	100%
Outside own operations	Ensure BU are aware of existing claims and expectations	Local communities	Reinforce stakeholder engagement for key sites and projects	# of initiatives taken by BU	To be defined
	Reinforce suppliers' audit and capacities building actions	Sourcing & procurement	Develop action program for suppliers in Asia	% of suppliers at risk audited and/or supported through dedicated actions	80%
	Assess decent wage level for workers in value chain	HR	Establish a benchmark of decent wage reference	# of suppliers above the minimum decent wage	80%
	Protect workers in value chain health & safety	Sourcing & procurement	Promote Safety management system for our suppliers at risk	Accident frequency rate # of employees covered with safety management system	To be defined

