



Corporate social, societal
and environmental
responsibility

2024 Report

Publication Décembre 2025

cromology

Dear team members, partners and stakeholders,

We are proud to present our 2024 social and environmental responsibility report. Corporate social responsibility (CSR) brings a genuine opportunity for differentiation, as sustainability and social progress contributions are a source of pride to Cromology and are already deeply embedded in our core values, strategic vision, and priorities for our employees, clients, and partners.

2024 was a strategic year for our CSR approach. Cromology has already integrated most of the Corporate Sustainability Reporting Directive (CSRD) requirements, though they become mandatory in 2027. We mapped a double-materiality assessment and collectively identified our impacts, risks, and opportunities. This report reflects these developments and reorients our vision to three fundamental pillars: People – Performance & Customer benefits – Planet.

The 2024 report offers comprehensive insights into all the policies, actions, and initiatives undertaken by our teams in support of these three pillars, highlighting the substance and rigour of our CSR approach.

Our 2024 results affirm the accuracy of our strategic decisions to adapt our model and foster a corporate culture rooted in collaboration and initiative.

In this spirit, we extend our sincere thanks to all our employees, partners, customers, and stakeholders for the exceptional initiatives undertaken across various areas, including safety, diversity, wastewater recycling, energy optimisation in our factories, the research and market launch of low-carbon products, and the implementation of social initiatives.

In a context of social, climate, and geopolitical changes affecting us all and impacting the environment, Cromology remains fully committed to making a positive contribution towards a decarbonised economy, resource-efficient performance, and a fairer, more inclusive world.

Sincerely,

Mickaël Hamot, Rui Caldas

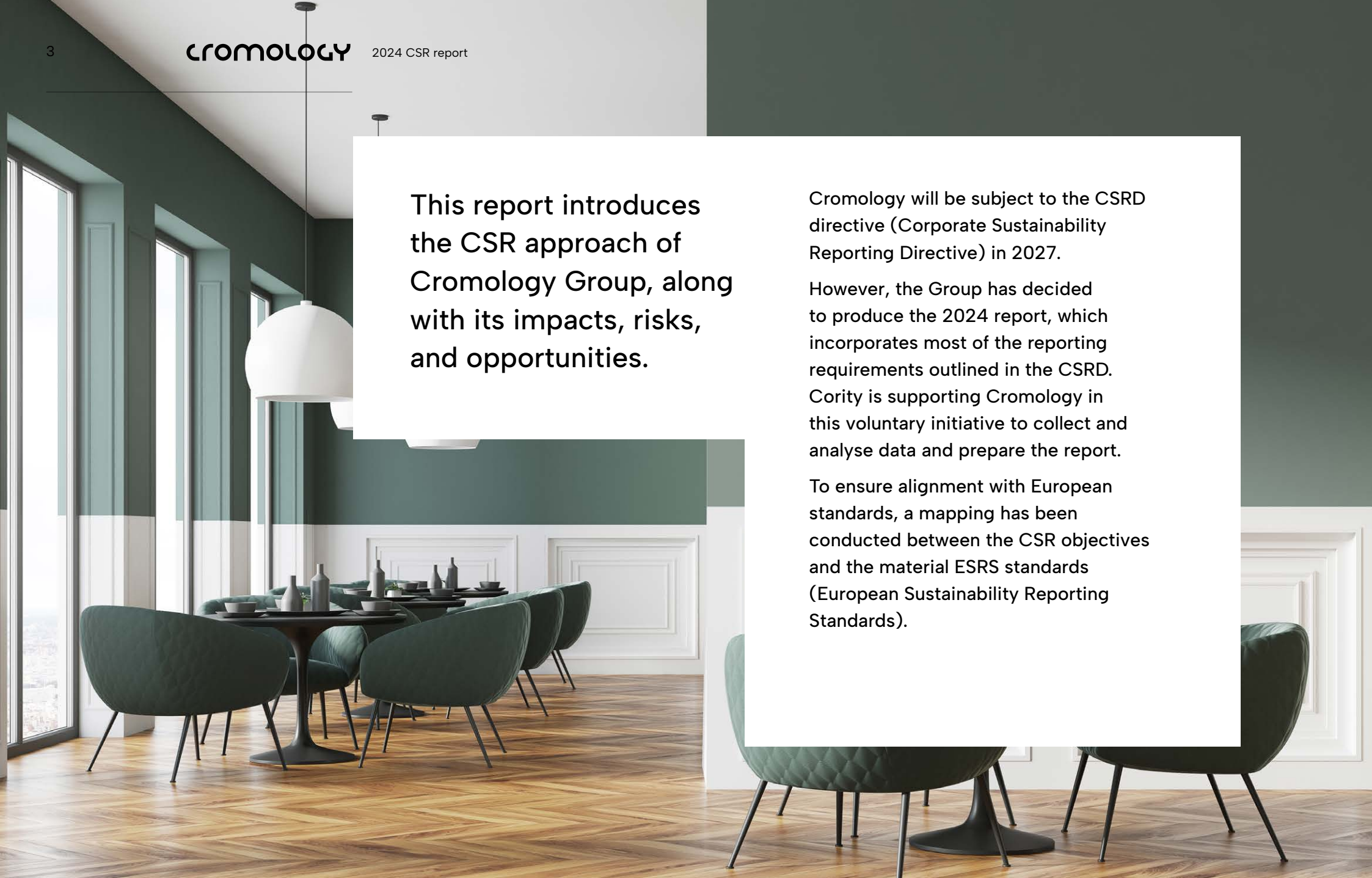


Mickaël Hamot

CHIEF EXECUTIVE OFFICER OF
CROMOLOGY FRANCE

Rui Caldas

DIRECTOR OF INTERNATIONAL
OPERATIONS

A modern dining room with green velvet chairs, a dark wood table, and a large window. The room features a herringbone wood floor, a white pendant light, and a green wall with white wainscoting. The text is overlaid on a white rectangular background.

This report introduces the CSR approach of Cromology Group, along with its impacts, risks, and opportunities.

Cromology will be subject to the CSRD directive (Corporate Sustainability Reporting Directive) in 2027.

However, the Group has decided to produce the 2024 report, which incorporates most of the reporting requirements outlined in the CSRD. Cority is supporting Cromology in this voluntary initiative to collect and analyse data and prepare the report.

To ensure alignment with European standards, a mapping has been conducted between the CSR objectives and the material ESRS standards (European Sustainability Reporting Standards).

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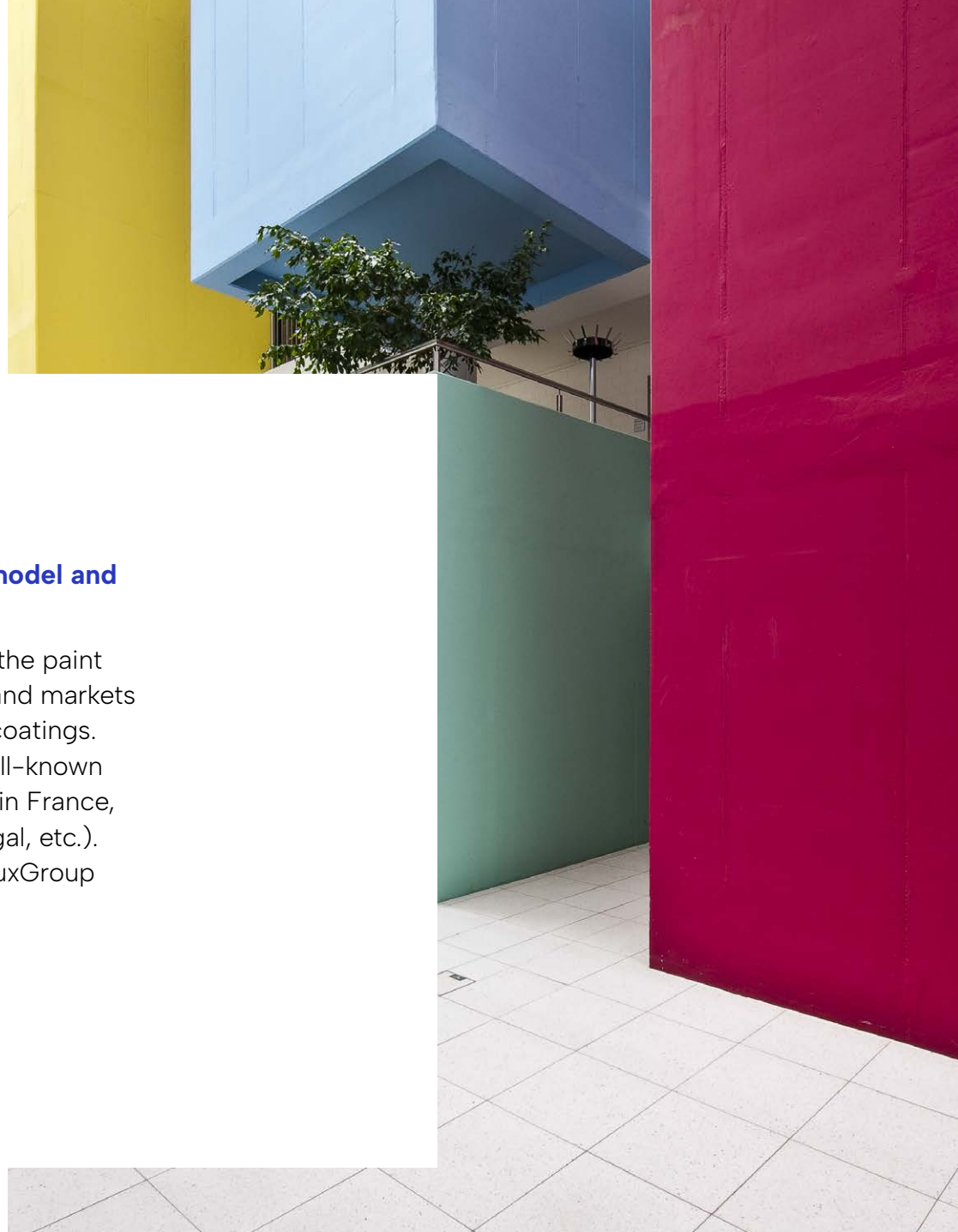
Définition des indicateurs.104

general information

1 Company snapshot

A. Group organisation, business model and value chain

Cromology is an integrated player in the paint industry that designs, manufactures and markets decorative and technical paints and coatings. The group operates under several well-known national brands (for example, Tollens in France, MaxMeyer in Italy, Robbialac in Portugal, etc.). It is a wholly owned subsidiary of DuluxGroup Ltd., an Australian company.



«Sustainably protect and colour living spaces to brighten up everyone’s lives.»

Purpose

Cromology’s purpose positions its business model within a framework of positive contribution to society and the environment, beyond mere financial performance. To support the Group’s ambitions, Cromology employees share strong values that guide their initiatives and daily behaviours.

Cromology’s Values



True Customer Satisfaction

Customers have choice. We are committed to giving them the best experience and making a difference. We invest in long-term relationships built on trust with our customers. Our professionalism and integrity ensure that we provide customers with the products and services that best meet their needs.



Excellence at Heart

We strive for the highest quality standards in everything we do, whether for our customers, our employees or our other stakeholders. We believe in a process of continuous improvement and change to constantly outdo ourselves, with a sense of pride for our teams and brands.



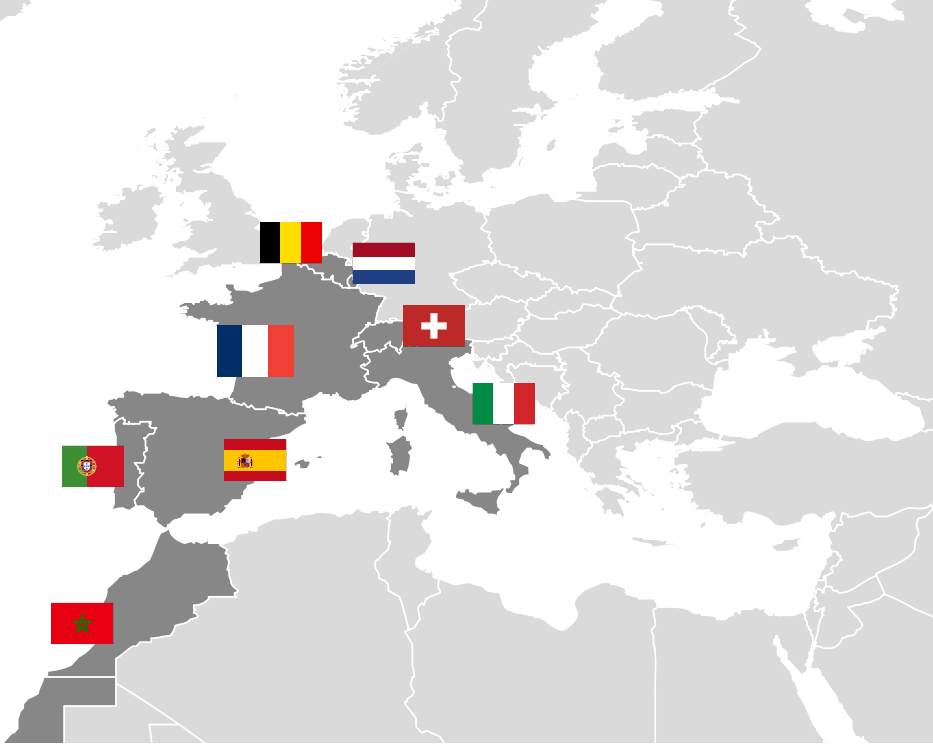
Collective Winning Spirit

We believe that victories are won by teams. This comes from mutually respecting and learning from our differences, and from pooling our resources. We take pleasure in our collective drive. This is key to customer satisfaction.



Geographic location

Cromology operates in eight countries: France, Italy, Spain, Portugal, Belgium, Luxembourg, Switzerland and Morocco, where it has industrial sites, logistics platforms and a network of sales outlets.



Part du Chiffre d'affaire en %

63% France

30% South Europe

7% Rest of the world



France

- 1 laboratories
- 4 production sites
- 2 logistics platforms
- 304 company-operated stores



Italy

- 1 laboratory
- 2 production sites
- 1 logistics platform



Portugal

- 1 laboratory
- 1 production site
- 1 logistics platforms
- 56 ompany-operated stores



Spain

- 1 laboratory
- 1 production site
- 1 logistics platforms



Belgium & Luxembourg

- 2 company-operated stores



Morocco

- 1 laboratory
- 1 production site
- 1 logistics platforms



Switzerland

- 13 company-operated stores

Product range

External Thermal Insulation Composite System (ETICS)



Paints and exterior coatings



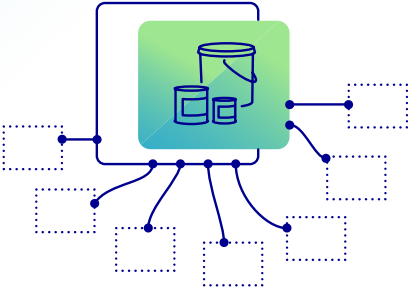
Interior decorative paints



Technical paints



Tooling / Equipment / Wall and floor coverings



Colours and services range

Univers couleur
Cromology

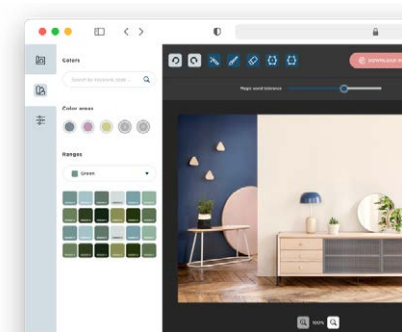
Tint system



Colour chart



Online simulator



Colour testing pots



Free waste collection from
our customers at points of
sale

90% of our Tollens
and Zolpan points of
sale are equipped with
Rekupo bins



Brands

TOLLENS

ZOLPAN

Classidur®

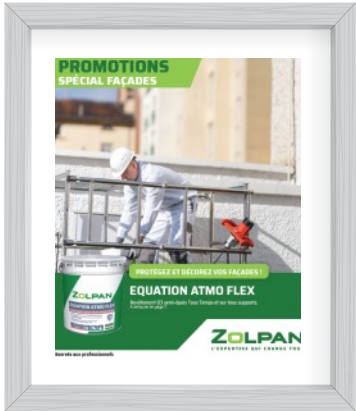


Robbialac® 

 Revetón

PLASDOX





Focus on Tollens, Zolpan and MaxMeyer

Des marques engagées en faveur de l'environnement, du bien-être et de l'artisanat.

Tollens

A colour brand promoting well-being, care for the home and inhabitants, and the durability of colours. A range with the maximum number of ECOLABEL products, formulations aimed at the lowest possible level of VOC emissions, and others incorporating the maximum number of biosource components. The manufacture of its pigments is centralised and controlled by our experts in our laboratories and factories in Italy.

Zolpan

A brand committed to:

- reducing the consumption of buildings through its ETICS development program;
- reducing CO2 emissions by developing the broadest possible range of low-carbon paints;
- supporting craftspeople in France through training programs for painters on new building techniques: ETICS and the application of reflective/heat-regulating paints (e.g. Cool Roof Technology).

MaxMeyer

A brand that cares about the role it plays in society and in the community where it operates. Its first commitment is environmental sustainability. The production sites have initiated a path to eliminate waste by reusing production waste. Moreover, caring for people and the planet through high-quality products, certified A+, EPD, formaldehyde-free and packaged in recycled or recyclable materials, is at the heart of MaxMeyer's strategy, which seeks to enhance quality of life and protect the environment.

Ecovadis

In 2024, Cromology ranked among the top 5% of the most responsible companies worldwide, earning the Gold medal.



EcoVadis is one of the leading organisations assessing corporate social and environmental responsibility, operating in over 175 countries. Its methodology, rigorous and independent, is based on international standards, and its evaluations are recognised by companies and institutions worldwide.

For its assessment, EcoVadis relies on four pillars:

- Environment
- Social and Human Rights
- Ethics
- Sustainable purchasing



8

countries



3100

employees



5

laboratories



9

productions
sites



6

logistics
platforms



375

company-operated
stores

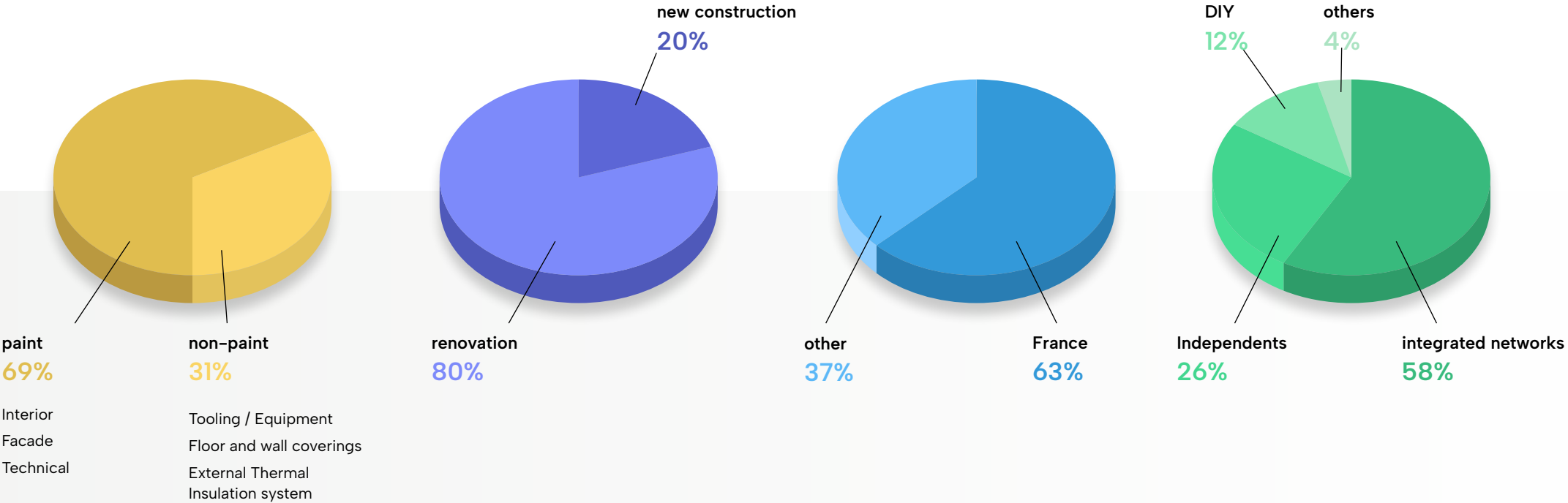
Infrastructure and production

- Cromology’s industrial and R&D processes are based on:
- 5 internal research laboratories that ensure a continuous flow of innovations (approximately 20% of revenue comes from products launched within the last three years).
 - 9 production sites certified to ISO 45001 for health and safety, ISO 9001 for quality, and ISO 14001 for environmental management: the sites span a range of capacities, from small-batch tinting to large-scale production of decorative and technical paints.
 - 6 national logistics platforms managing distribution, supported by subcontracted carriers: the logistics platforms consolidate flows from the factories, manage finished product inventories, and organise distribution to company-owned stores, partner distributors and major account clients.

Sales network for products

Cromology also operates a company-owned network of 375 retail outlets, which accounts for nearly 60% of sales and provides practical services to professionals (tinting, delivery to construction sites, technical advice). This network is complemented by brand e-commerce platforms, independent distributors and DIY retail chains.

Revenue breakdown



TOTAL 2024

690M€ in sales

Customer segmentation

Cromology’s customer base is composed mainly of:

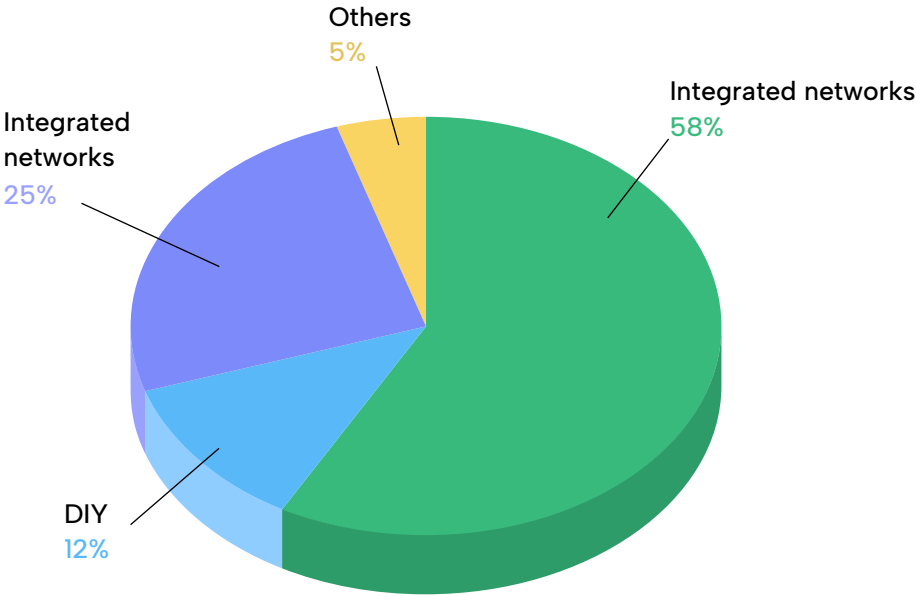
- Building professionals – painters and applicators, renovation companies, and façade specialists – who purchase paint in large formats and rely on the integrated network’s tinting and on-site delivery services.

- Independent wholesalers and distributors who resell products under their own brands or national brands to their artisan clients.
- DIY superstores and e-commerce platforms that serve the consumer market: these customers mainly seek smaller packaging formats, a simple colour chart and application tutorials.

- Institutional key accounts – property developers, social housing providers, local authorities, and hotel chains – through framework agreements in which the supply of paint is frequently accompanied by technical support and colour specification services?

Our business model combines:

- The production of ranges of paints and coatings,
- The distribution of paints, coatings and additional non-paint products (application products, tools, etc.),
- The provision of technical training, support and advisory services.



OUR RESOURCES

Human Capital

3100

employees in 8 countries

68% in France
23% in Southern Europe
9% other countries
+ 40 nationalities

Intellectual Capital

19h

hours of training per employee

5 internal R&D laboratories
17% of sales are products launched in the last 3 years

Industrial Capital

100%

of industrial sites certified ISO 45001, 14001 & 45001

9 productions sites

Distribution Capital

6 logistics platforms

378 company-operated stores

E-commerce platforms from the group's brands

Portfolio of well-known brands, leading B2B brands in their respective countries: Tollens (FR), Max Meyer (IT), Robbialac (PRO)

External purchases

Raw materials and packagings
Non-paint products (tooling, equipment, floor and wall coverings)

OUR PRODUCTS AND SERVICES

Indoor paints

Outdoor paints

Technical paints

Thermal insulation

Non-paint products

Advice from experts

Training services

Technical support

KEY PARTNERS

- Private laboratories for certification, granting ecolabels
- Universities and private laboratories: detection of potential technologies

DISTRIBUTION CAPITAL

- Transport subcontractors
- distribution partners: independent distributors and DIY stores

VALUE CREATION FOR OUR STAKEHOLDERS

Client and customers

- Products and innovative services
- Technical expertise
- Location of points of sale as close as possible to our customers

Partners

- Ethical approach in business
- Business codes of conduct
- Active member of the CEPE Industrial Federation (Europe) and national associations

Local initiatives

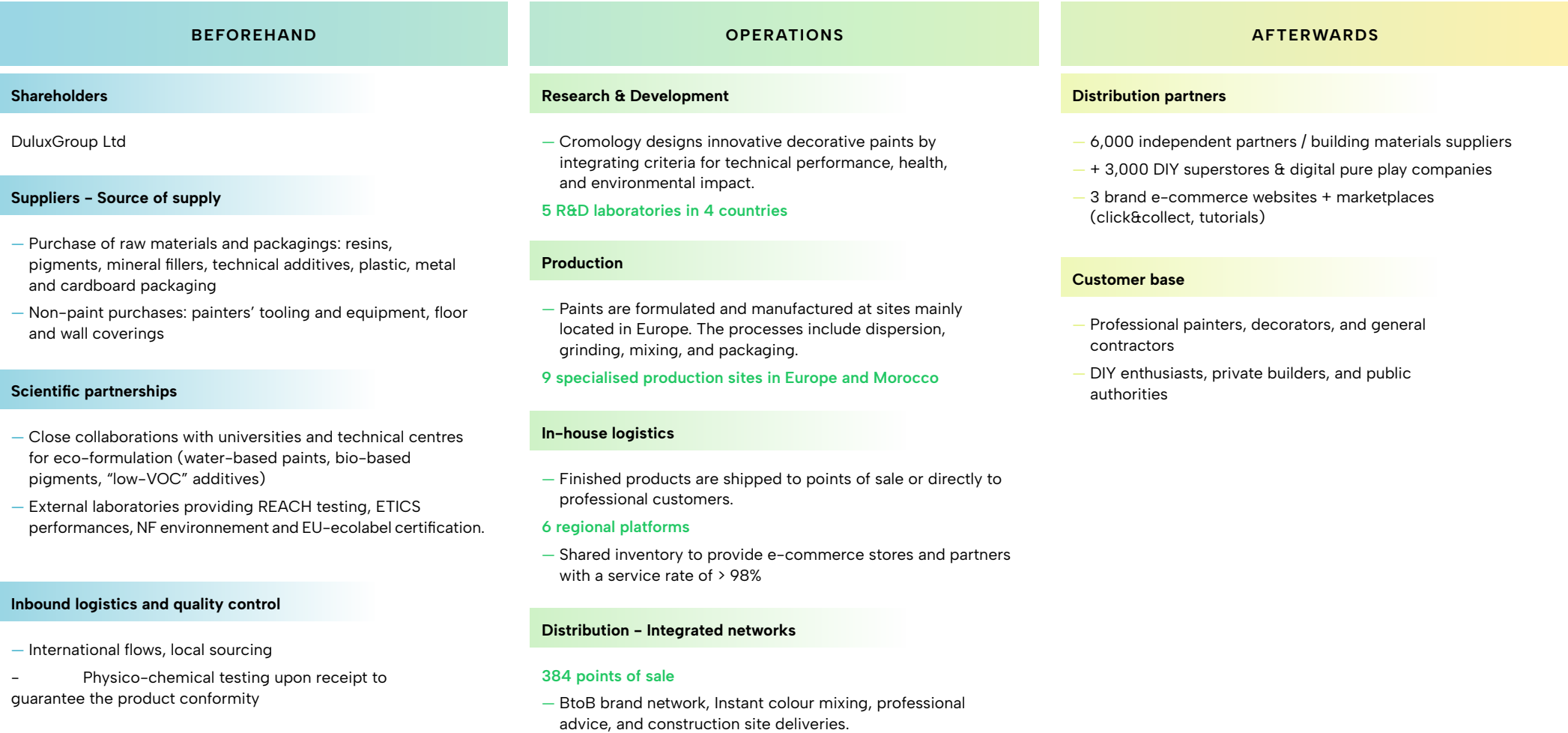
- Support for local initiatives internally and in collaboration with associations
- 98% of products are sold in the region where they are manufactured

Employees

- QHSE policy
- Health, Safety and Environmental management system / Golden rules for safety and environment

Environment

- Approximately 95% of our raw materials are sourced from Europe.
- 96% of products are water-based across total production
- 56% of sales are from paints with an environmental label.



B. Our CSR strategy based on 3 pillars

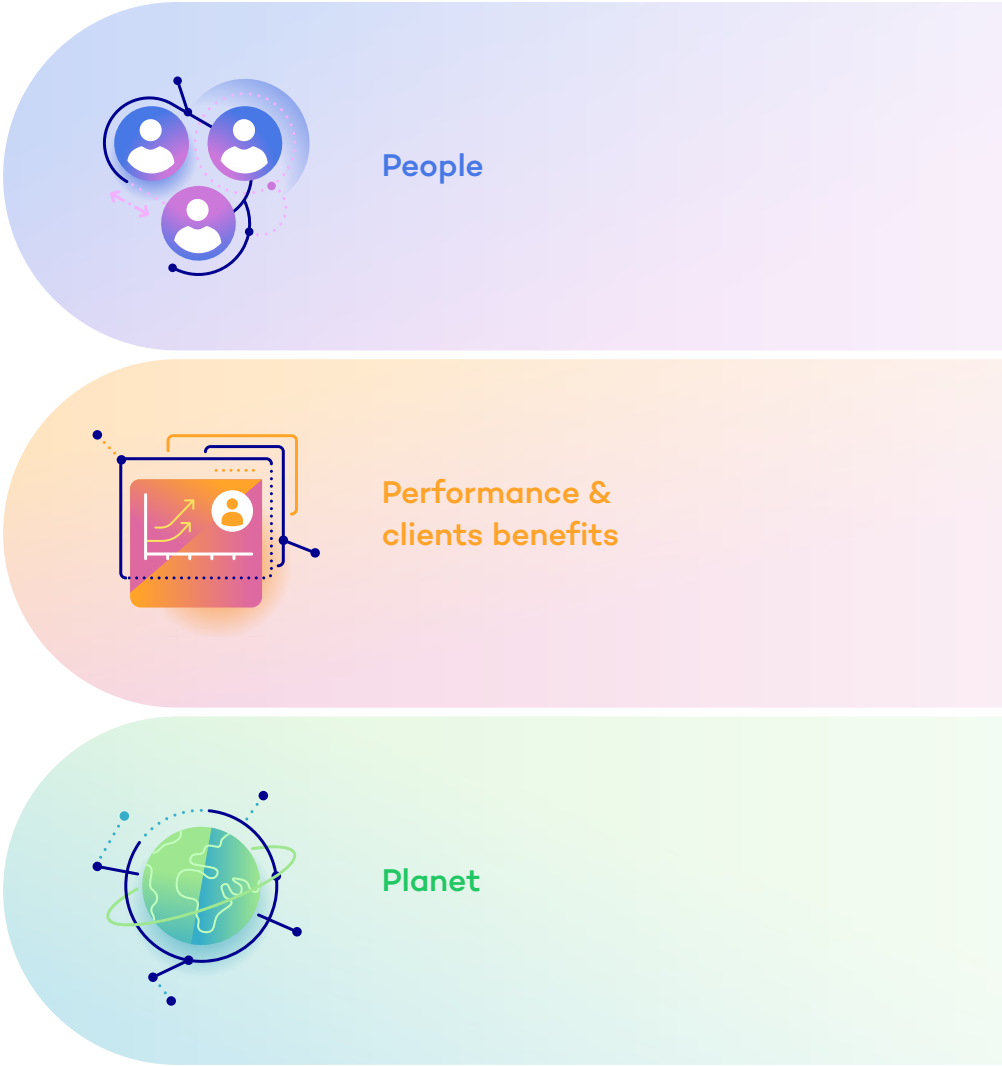
Cromology’s CSR strategy is built on three pillars: Planet, People, Performance and Customer Benefits. This approach integrates social, environmental, and governance challenges at the core of our activities.

Developed in parallel with the double materiality analysis ([see Section – Double Materiality Analysis](#)), this strategy was subsequently adjusted to reflect the themes considered most material to the Group and its stakeholders

To ensure alignment with European standards, a mapping was carried out between the CSR objectives and the material ESRS standards.

Performance indicators were also associated with each pillar to measure progress towards the objectives and will be presented in detail in the sections corresponding to each ESRS standard. The table below presents this structure, specifying for each pillar the associated goals and the corresponding ESRS standards.

ESRS = European Sustainability Reporting Standards, requirements imposed by the European CSRD Directive (Corporate Sustainability Reporting Directive).





Objectives	Details	Corresponding ESRS standards (European Sustainability Reporting Standards)
Ensure employees well-being	To ensure the health and safety of employees at production sites and points of sale	ESRS S1 – Own workers
Promote diversity and inclusion	To guarantee an inclusive work environment in which everyone can thrive.	
Ensure talent retention	To encourage people to surpass themselves and to foster the retention of our talents in a highly competitive environment	
Establish favourable social conditions in the value chain	To promote partnerships throughout the value chain to monitor and improve social conditions while taking communities into account	ESRS S2 – Workers in the value chain
Establish sustainable partnerships with customers and suppliers	To promote collaboration with customers and suppliers to increase long-term loyalty and profitability.	ESRS S4 – Consumer and end-users
Ensure integrity and compliance	To promote the highest levels of integrity and compliance within the organisation.	ESRS G1 – Business conduct
Ensure the quality of products and service	To ensure high product quality and customer satisfaction	ESRS S4 – Consumer and end-users
Manufacture and distribute sustainable products	To ensure innovation by fostering the growth of sustainable products	All environment-related ESRS
Organise the circular economy	To incorporate recycled materials into our products and packaging to reduce their environmental impact	ESRS E5 – Resource use and circular economy
Recycle and optimise water and waste	To ensure absolute frugality in water consumption and to improve the recycling and reuse of waste.	ESRS E3 – Water and marine resources ESRS E5 – Resource use and circular economy
Reduce greenhouse gas emissions	To define actions and a clear strategy to reduce GHG emissions (from supplier raw materials, energy consumption, etc.) to contribute to mitigating climate change.	ESRS E1 – Climate change
Preserve biodiversity*	To reduce pollution and its impact on biodiversity (water, air, etc.)	*Objective included following the double materiality analysis

*Objective included following the double materiality analysis

Sustainable Development Goals

Cromology’s approach is also aligned with the United Nations Sustainable Development Goals (SDGs). Cromology identified the five most relevant SDGs for its activities.



**SUSTAINABLE
DEVELOPMENT
GOALS**

3 GOOD HEALTH
AND WELL-BEING



5 GENDER
EQUALITY



8 DECENT WORK AND
ECONOMIC GROWTH



12 RESPONSIBLE
CONSUMPTION
AND PRODUCTION



13 CLIMATE
ACTION



It is on this basis that Cromology is committed, in pursuit of responsible and sustainable performance, to maximising the value that the Group generates for its stakeholders, clients, employees, shareholders, suppliers, civil society and professional organisations.



C. Cromology’s stakeholders

Open and transparent dialogue with our stakeholders is essential to Cromology’s sustainability. It allows us to understand their expectations, communicate about our initiatives and challenges, and progress together through knowledge sharing. This dialogue promotes sustainable performance by enabling the identification of new opportunities, accelerating innovation and Cromology’s transformation, and strengthening our attractiveness, reputation and resilience.

Cromology has been triple-certified to ISO 9001, 14001 and 45001 for several years. In accordance with these standards, Cromology has developed a method to identify relevant internal and external issues related to its purpose and strategic direction. These issues are diverse.

Here are the main challenges:

- Strategic planning
- Economic
- Change in business activity
- Legislative and regulatory
- Environmental
- Related to local authority projects
- Social
- Cultural
- Technological

Cromology carried out this analysis by organising working meetings with key managers relevant to these issues and by assessing the influence and strategic importance of each stakeholder.



category	stakeholders	communication	added value
Internal stakeholders	Team members	<p>The Group has always encouraged dialogue with its team members, who are the driving force behind its success:</p> <ul style="list-style-type: none">• Interaction between managers and team members, including performance and development reviews• Onboarding programmes for new team members• Quarterly videoconferences for all managers• Internal engagement survey: Choose My Company• The Cromology internal portal enables daily	<p>Improve working conditions, safety and well-being (e.g., access to a gym for head office team members)</p> <p>Provide fair remuneration for team members</p> <p>Work-life balance: remote work charter, disconnection policy</p>
Internal stakeholders	Employee Representative Bodies	<p>The Group promotes dialogue with employee representative bodies, which it regards as genuine partners:</p> <ul style="list-style-type: none">• Expliquer la stratégie et la vision de Cromology• Répondre aux interrogations légitimes des collaborateurs• Maintenir la confiance• Expliquer et anticiper les transformations nécessaires de l'entreprise.• Qualité et continuité du dialogue social	<p>Explain Cromology's strategy and vision</p> <p>Address employees' legitimate questions</p> <p>Maintain trust</p> <p>Explain and anticipate necessary organisational changes</p> <p>Ensure quality and continuity of social dialogue</p>
Internal stakeholders	General management	<p>Executive management defines the vision, policies, objectives and action plans while taking key issues into account</p> <p>The Cromology Executive Committee meets several times a month to monitor results, adjust objectives and action plans (Ethics Committee, CSR Committee, etc.)</p>	<p>Drive CSR performance, prioritise, adapt and allocate resources</p> <p>Prepare for the future</p> <p>Anticipate necessary organisational changes</p> <p>Ensure the maintenance of corporate culture</p> <p>Verify that the organisation is aligned with sustainable development</p> <p>Ensure that all policies are implemented effectively and efficiently</p>
Business partners	Clients (companies, independent distributors, painters)	<p>The Group builds strong and lasting commercial relationships with its clients:</p> <ul style="list-style-type: none">• Sales representatives' visits• In-store reception• Commercial contracts• Customer satisfaction surveys• Local and ad hoc sponsorships• Technical support• Product and application training• Training on external thermal insulation• Waste collection (ReKupo, ECO DDS)• Construction site best practices	<p>Create and maintain long-term relationships</p> <p>Listen to our clients' needs and understand their expectations to innovate throughout the product lifecycle</p> <p>Improve the health and safety of our customers by bringing to market products that are increasingly safe and environmentally responsible</p> <p>Support our clients in managing waste from their activities</p> <p>Provide product expertise and best application practices</p>

category	stakeholders	communication	added value
Business partners	Suppliers: raw materials, packaging, non-paint goods, consumables, tinting machines, vehicle fleet	Negotiation meetings Contract reviews Emails Regular audits of our strategic suppliers Performance evaluation meetings, including CSR	Build and maintain long-term relationships Listen to our suppliers' needs and communicate our own Understand their constraints and express our requirements to innovate throughout the product lifecycle Source increasingly innovative products in terms of safety, health and the environment Benefit from our suppliers' expertise in using their products and managing our waste
Business partners	Transporters	Negotiation meetings Contract reviews Emails Regular audits of our strategic suppliers Performance evaluation meetings, including CSR	Build and maintain long-term relationships Listen to our suppliers' needs and communicate our own Understand their constraints and articulate our requirements to drive innovation across our supply chain Optimise transport routes in terms of distance travelled and frequency Optimise transported loads
Business partners	Service providers	Negotiation meetings Contract reviews Emails Regular audits of our strategic suppliers Performance evaluation meetings, including CSR	Build and maintain long-term relationships Listen to our service providers' needs and communicate our own Understand their constraints and express our requirements to drive continuous innovation Collaborate with service providers who share our values and our standards for health, safety and environmental performance
Business partners	Insurers	Regular visits Regular audits of our sites Post, emails Contract reviews Follow-up meetings on our improvement plans	Ensure a high level of prevention by implementing improvement plans Ensure that our industrial sites and points of sale meet the highest fire safety standards Ensure that our employees are appropriately trained to respond to incidents, thereby minimising their consequences
Business partners	Recruitment and temporary staffing agencies	Regular visits Regular audits of our sites Post, emails Follow-up meetings on our improvement plans	Enable Cromology to respond quickly to fluctuations in activity and meet the needs of skilled employees Build and maintain long-term relationships Understand their constraints and communicate our requirements regarding safety and professional qualifications
Public authorities/ institutions	City council, departments, regional authorities, Greater Paris	Regular joint meetings Emails Post	Build and maintain long-term relationships Anticipate changes in local urban planning, new financial requirements, and construction works

category	stakeholders	communication	added value
Public authorities/ institutions	Training organisations, partnerships with schools	Regular joint meetings Emails Web portals of these organisations and schools	Increase Cromology's visibility and help recent graduates understand our professions, activities, values and CSR policy Enable Cromology to recruit its future talent
Public authorities/ institutions	DREAL (French Regional Directorate for Environment, Planning and Housing) / Prefecture	Regular visits Inspections Post, emails and official notifications	Maintain and ensure compliance with ICPE regulations across our sites Maintain excellent relationships, anticipate new requirements and ensure sustainable industrial operations
Public authorities/ institutions	CARSAT/CRAMIF/CPAM	Regular visits Inspections Post, emails Participation in joint HR and HSE meetings	Develop a long-term relationship of trust Maintain open and transparent communication Improve prevention practices for the health and safety of our employees
Public authorities/ institutions	DRIETS/Health and Safety Executive	Regular visits Inspections Post, emails Participation in joint HR and HSE meetings Health and safety at work committee	Développer une relation durable de confiance Maintenir une communication transparente et franche Faire progresser nos pratiques de prévention pour la santé et la sécurité de nos employés
Associations	Neighbours (private individuals)	Management and consideration of potential complaints regarding disturbances Responses to questions on our environmental impacts	Conserver d'excellente relations avec nos riverains Développer et maintenir la confiance Devoir de transparence pour rassurer notre voisinage
Associations and others	Residents' associations	Management and consideration of potential complaints regarding disturbances Responses to questions on our environmental impacts	Conserver d'excellente relations avec nos riverains Développer et maintenir la confiance Devoir de transparence pour rassurer notre voisinage
Associations and others	Environmental protection associations	Response to questions regarding our environmental impacts and our products. According to their requests	Educate and share reliable information with complete transparency
Associations and others	Consumer associations	Response to questions regarding our environmental impacts and our products. According to their requests	Educate and share reliable information with complete transparency



2 Governance

A Organisation of Cromology's Governance

Cromology's corporate governance is direct and transparent. It encompasses the management of both strategic and operational risks. It aims to balance the Group's short-term needs with a long-term vision. It also holds the Chairpersons and Board Members accountable for the stewardship of Cromology.

Cromology's governance framework ensures a high level of communication and transparency by promoting full accountability and justification for decisions and transactions.

The governance framework sets out the principles, structures, enablers and interfaces that underpin the Group's governance arrangements. It also involves delegating appropriate levels of authority and accountability to senior leaders.

Cromology ensures full traceability of its decision-making processes and of the individuals involved at each stage.

The corporate governance provides a means to review conduct before it is subject to regulatory oversight.

Cromology structures its CSR Governance through two dedicated bodies: the CSR Committee and the Ethics Committee.

The overall governance model is designed to organise the flow of information, decision-making and actions between DuluxGroup Ltd, Cromology's sole shareholder, and the Cromology Executive Committee.

The Cromology Executive Committee approves the Ethics Charter and all CSR policies, which are subject to a mandatory review every three years or upon organisational changes. The Compliance Officer plays a central role in overseeing cultural integrity, particularly in cases of concerns or potential breaches.

Topics such as ethics, anti-corruption, human rights, diversity and inclusion, safety, and social and environmental responsibility are core priorities. These matters are addressed at every level of the organisation, notably through compliance reviews, risk assessments and strategic decision-making processes.

B. Cromology’s governance structure

<div>DuluxGroup – Cromology Advisory Board</div> <div>4 meetings per year</div> <div>An assessment of the Cromology CSR Policy definition and roll-out is presented to the Board every quarter.</div>	<div>Cromology Executive Committee</div> <div>10 meetings per year</div> <div>The Executive Committee validates the CSR objectives and action plan. It ensures their effective implementation across all Cromology entities and functions.</div>	<div>CSR Committee</div> <div>10 meetings per year</div> <div>The CSR Committee defines and conducts the group’s CSR action plans for the identified pillars. Pillar leaders are responsible for coordinating the rollout of action plans with country CEOs and function representatives in Human Resources, Safety, Environment, Legal, Purchasing, R&D, and Marketing. With the support of the CEC members, these representatives ensure that commitments are relevant, adapted, and implemented by all teams, along with the indicators used to monitor the performance of the implemented policies.</div>
		<div>Ethics Committee</div> <div>4 meetings per year</div> <div>The committee meets quarterly for one to two hours and may convene ad hoc sessions if urgent matters arise. The Ethics Committee reviews the Group’s compliance with CSR-related risks that could strongly impact Cromology’s operations or reputation. An ethics whistleblowing system, accessible to all stakeholders, is available for reporting events related in particular to accounting or financial matters, corruption, breaches of competition rules, serious harm to the environment or health, unethical behaviour (including discrimination and harassment), data protection issues, or conflicts of interest. The Ethics Committee is composed of: – The Managing Director, Cromology France – The Managing Director, Cromology International – The Group General Counsel – The Group HR Director – The Group Supply Chain Director The purpose of the Committee is to review the following objectives: – Foster a strong and ethical working environment – Oversee compliance matters, including:<ul style="list-style-type: none">• anti-corruption,• competition law,• trade controls,• workplace conduct, • GDPR, • abuse reporting • prevention of modern slavery The usual agenda includes reviewing: – Compliance roadmaps – Compliance training and awareness programmes – Reported alerts, including the reporting hotline – The communication plan – The DuluxGroup compliance framework</div>

C. Sustainability risk governance

Cromology defined its CSR vision for 2023 back in 2020, and revised it in 2024 to reflect the outcomes of its double materiality assessment.

The CSR steering Committee is responsible for shaping and driving the Group’s CSR vision. This Committee met eight times in 2024.

In each country, CSR coordinators are responsible for deploying the Group-wide CSR strategy and monitoring local initiatives.

3 Double Materiality Analysis

In 2021, Cromology conducted its first materiality assessment to understand stakeholder expectations regarding its sustainability ambitions better. Through a consultation involving more than 126 external and internal stakeholders, including suppliers, distributor clients, specifiers, painters, B2C customers, non-profit organisations, sector experts, financial actors, as well as public, institutional and economic stakeholders, ten priority sustainability topics were identified.

In 2024, this approach was strengthened with Cority’s support through a double-materiality assessment, in line with the CSRD requirements. This methodology evaluates two complementary dimensions: impact materiality, which assesses how Cromology’s activities affect society, the environment and people, and financial materiality, which considers sustainability-related risks and opportunities that may influence the company’s performance.

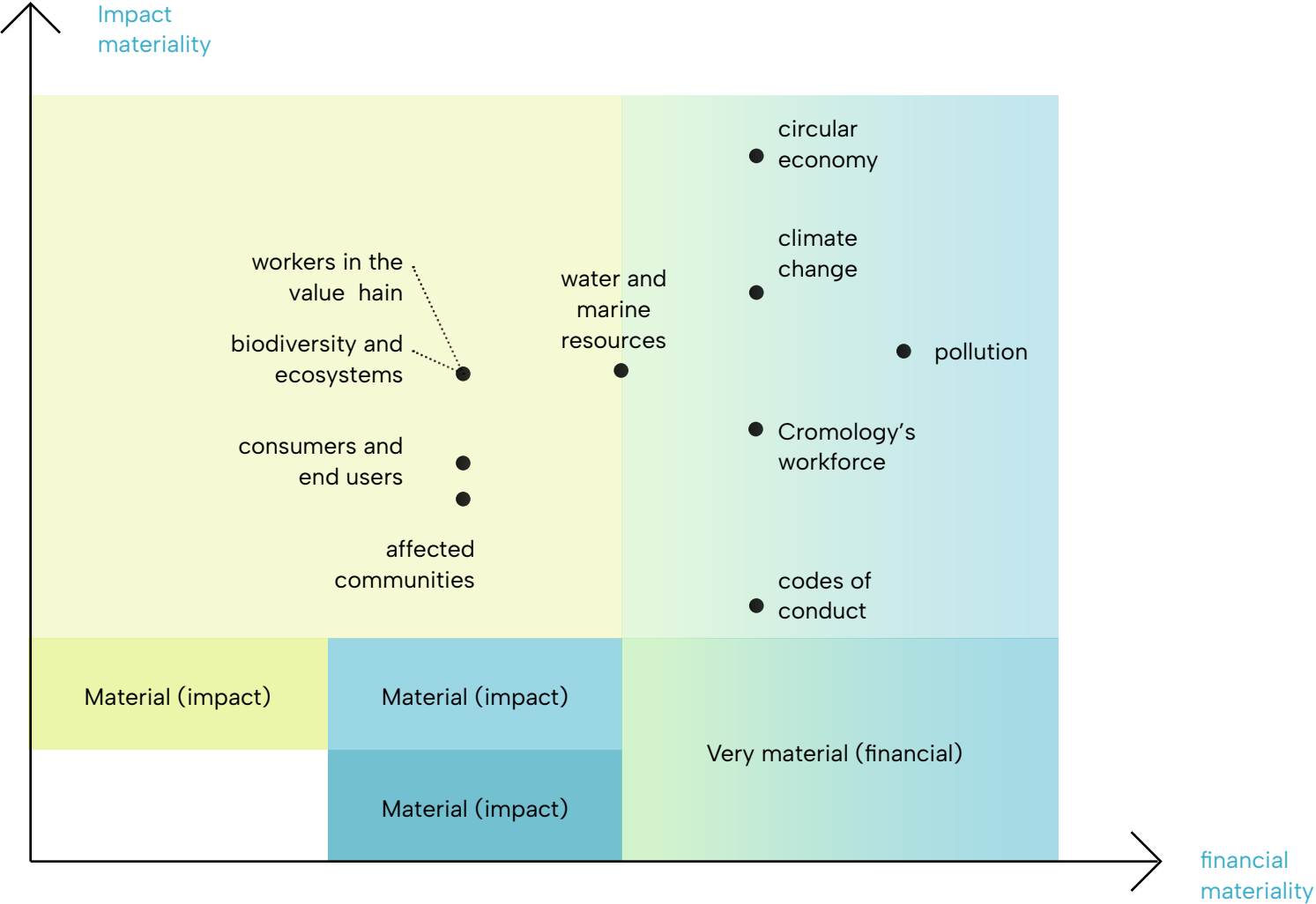
Drawing on an in-depth document review and interviews with twelve internal representatives from various functions and countries, the analysis enabled the identification, assessment, and prioritisation of the impacts, risks, and opportunities considered material. Each topic was evaluated against regulatory criteria and positioned on a matrix that reflects both impact and financial materiality. The full methodology applied to this exercise is provided in the appendix section (see Appendix – Double Materiality Assessment Methodology).

All the topics listed in the regulation (circular economy, climate change, pollution, biodiversity and ecosystems, water and marine resources, Cromology’s workforce, workers in the value chain, affected communities, consumers and end users) were assessed as material for Cromology.

This rigorous work, validated by both the CSR Committee and the Executive Committee, ensures the robustness of the approach and strengthens its strategic alignment. The conclusions of the assessment inform Cromology’s CSR roadmap and further embed sustainability considerations at the core of its business model.

Double Materiality

Impacts, risks, and opportunities (IRO) assessed as material for Cromology are fully detailed across the report’s thematic sections, aligned with the requirements of ESRS standards. Each section thus presents the IROs associated with the corresponding sustainability issues



People

1 – Our employees

30

A. Description of impacts, risks and opportunities related to our workforce

30

B. Data relating to our employees

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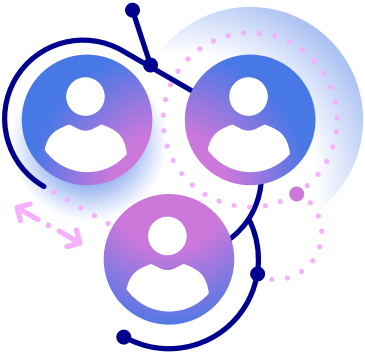
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1 Our employees

A. Description of impacts, risks and opportunities related to our workforce

Cromology is committed to creating an environment that supports the success, well-being and fulfilment of its employees, while fostering both their professional and personal development.



As a paint manufacturer, the company faces several social challenges that can have a direct impact on the health, well-being and working conditions of our team members:

Health / Safety

Within production sites and industrial units, the main impacts stem from exposure to hazardous substances (solvents, pigments), the use of machinery, and fire or explosion risks. In retail outlets, the most significant risks relate to forklift operations, manual handling, and ergonomics.

Work Organisation

Key considerations include working hours, the possibility (or not) of remote work, and the constraints associated with alternating shift systems (2x8 or 3x8).

Training and skills development

For an international and decentralised Group such as Cromology, managerial challenges are substantial and require capabilities adapted to each local context.

Beyond these aspects, staff members benefit from a comprehensive training policy that enhances employability and supports day-to-day growth and engagement.

Inclusion and equal treatment

Any situation of inequality or discrimination can create a sense of exclusion and hinder access to employment, ultimately affecting internal cohesion and workforce diversity.

Thus, actively addressing these topics represents a powerful opportunity for Cromology. By strengthening its employer brand and its reputation among employees, candidates and the broader market, the company can retain its talent and attract new team members.

In the long term, improving working conditions and promoting equality also enhance collective performance and boost productivity.

Conversely, failing to address these challenges exposes the company to multiple risks: operational risks (strikes, business interruption), legal risks (claims, litigations), and reputational risks that could have lasting impacts on the business.

The methodology used to identify impacts, risks, and opportunities (IRO) related to our workforce is based on the 2025 double materiality assessment. A detailed description of this methodology is provided in the appendix section (see Appendix – Double Materiality Assessment Methodology) and is applied consistently throughout the relevant sections of this report.



Detailed description of the impacts, risks and opportunities related to our team members

Detailed description of impacts, risks and opportunities, [see Appendix – Double Materiality Assessment Methodology](#).

			Upstream value chain	Operations	Downstream value chain	Time horizons
Job security	I _P (potential)	Enhanced confidence in the future through financial stability that supports long-term projects.		X		CT
	R	Operational risk and loss of opportunity in the event of a strike by employees demanding improved working conditions, particularly regarding job security.		X		MT-LT
Working time	I _N (real)	Adverse effects on the physical and mental health of factory employees due to irregular two-shift working patterns.		X		MT
	R	Operational risk and loss of opportunity in the event of a strike by employees protesting against working hours.		X		MT
	O	Reduction in recruitment costs through improved employer attractiveness and talent retention, together with increased market share due to enhanced team performance and product quality.		X		MT-LT
	I _N (real)	Risk of economic instability linked to low employee remuneration, which affects employee well-being.		X		CT
Adequate wages	R	Operational risk and loss of opportunity in the event of a strike by employees protesting against wages, as well as a risk of talent loss to competitors.		X		MT
	O	Reduction in recruitment costs through improved employer attractiveness and talent retention, together with increased market share due to enhanced team performance and product quality.		X		MT-LT
	I _P (real)	Encouragement of social dialogue through the introduction of processes such as the representation of the Business and Social Council at all sites.		X		MT
Social dialogue	R	Operational risk and loss of opportunity in the event of a strike by employees protesting against the absence of social dialogue, and in the event of a deteriorated social climate leading to talent loss.		X		MT
	O	Decrease in internal conflicts and strengthened employee engagement towards the company, resulting in reduced turnover and lower recruitment costs.		X		MT-LT
Collective bargaining	I _P (real)	Promotion of collective bargaining through the implementation of processes such as Business and Social Council representation at all sites.		X		MT
Work-life balance	O	Reduction in recruitment costs through improved employer attractiveness and talent retention, together with increased market share due to enhanced team performance and product quality.		X		MT-LT
	R	Operational risk and loss of opportunity in the event of a strike by employees protesting against the imbalance between working time and personal time, particularly time dedicated to family life.		X		MT-LT



			Upstream value chain	Operations	Downstream value chain	Time horizons
Health and safety	I _N (real)	Risk of workplace accidents and fatalities within Cromology factories and points of sale.		X		CT-MT
	R	Regulatory risk due to potential exposure to fines, legal proceedings and compensation in the event of workplace accidents, whether fatal or non-fatal.		X		CT-MT
	R	Reputational risk leading to increased recruitment costs due to talent loss resulting from insufficient safety measures.		X		LT
Gender equality and equal pay	I _N (real)	Gender pay gap for work of equal value, leading to reduced employee confidence and well-being.		X		MT
Training and skills development	I _P (real)	Improved employee skills and professional development through the introduction of an e-learning platform.		X		MT
	I _N (real) development	Skills gaps in leadership and communication among certain managers and sales staff are affecting employees and their teams.		X		CT
	O	Reduction in recruitment costs and enhancement of the employer brand through increased attractiveness to talent, as well as through the promotion of internal career development.		X		MT-LT
Employment and inclusion of persons with disabilities	I _N (potential)	Under-representation and feelings of exclusion among persons with disabilities are due to the absence of effective strategies for recruiting and supporting these employees or candidates.		X		MT
Measures against workplace violence and harassment	I _N (potential)	Risks of harassment and discrimination within the workplace, affecting employees' mental health.		X		MT
Diversity	I _N (potential)	Feelings of exclusion among current employees and limited professional opportunities for candidates due to unsuitable recruitment practices.		X		MT
	O	Reduction in recruitment costs through enhanced attractiveness resulting from Cromology's employer brand development.		X		MT-LT
Private life	I _N (potential)	Risks of identity theft and commercial harassment in the event of a breach of employee data.		X		CT
	R	Reputational risks in the event of a cyberattack leading to the leakage of employees' personal data.		X		MT



B. Data relating to our employees

Employee-related data have been collected at the country level. Since the workforce in France represents approximately 67% of the total headcount, this scope therefore has a significant influence on the Group’s consolidated value.

In the tables below, the values presented at the Group level and marked with an asterisk (*) correspond to a weighted average of the data from each entity, calculated according to their respective headcounts.

General characteristics of employees	France	Italy	Portugal	Spain	Morocco	Switz-erland	Group	Coverage rate
Group workforce	2 094	280	278	189	189	78	3 108	100%
Number of women	691	66	54	36	28	20	895	100%
Number of men	1 403	214	224	153	161	58	2 213	100%
Share of women in the total workforce (%)	33	24	19	19	15	26	29	100%
Employees by type of contract	France	Italy	Portugal	Spain	Morocco	Switz.	Group	
Number of employees on permanent contracts	2 000	279	270	180	189	71	2 989	100%
N. of employees on permanent contracts – Women	651	65	53	35	28	20	852	100%
Number of employees on permanent contracts – Men	1 322	214	217	145	161	19	2 078	100%
Number of employees on temporary contracts	96	1	3	9	0	7	114	100%
Number of employees on temporary contracts – Women	40	1	0	1	0	1	43	100%
Number of employees on temporary contracts – Men	56	0	3	8	0	6	73	100%
Number of full-time employees	2 057	267	278	181	0	74	2 857	100%
Number of full-time employees – Women	658	53	54	35	0	17	817	100%
Number of full-time employees – Men	1 399	214	224	146	0	57	2 040	100%
Number of part-time employees	37	13	0	8	0	4	62	100%
Number of part-time employees – Women	33	13	0	1	0	3	50	100%
Number of part-time employees – Men	4	0	0	7	0	1	12	100%
Hiring and departures	France	Italy	Portugal	Spain	Morocco	Switz.	Group	
Number of hires – Permanent employees	320	22	28	11	12	18	411	100%
Number of departures – Permanent employees	371	17	22	20	8	14	452	100%
Turnover rate for permanent employees	18	6	8	11	4	18	15	100%
Diversity within the Management Team	France	Italy	Portugal	Spain	Morocco	Switz.	Group	
Number of members of the Management Team	66	9	6	7	5	2	95	100%
Share of Management Team members within the total workforce (%)	3	3	2	4	3	3	3	100%
Share of women within the Management Team (%)	27	11	17	14	40	0	24	100%
Share of men within the Management Team (%)	73	89	83	86	60	100	76	100%



The number of employees at Cromology is relatively stable, with a 1.2% decrease in the total workforce compared with 2023. The number of hires has therefore been adjusted to the company’s needs.

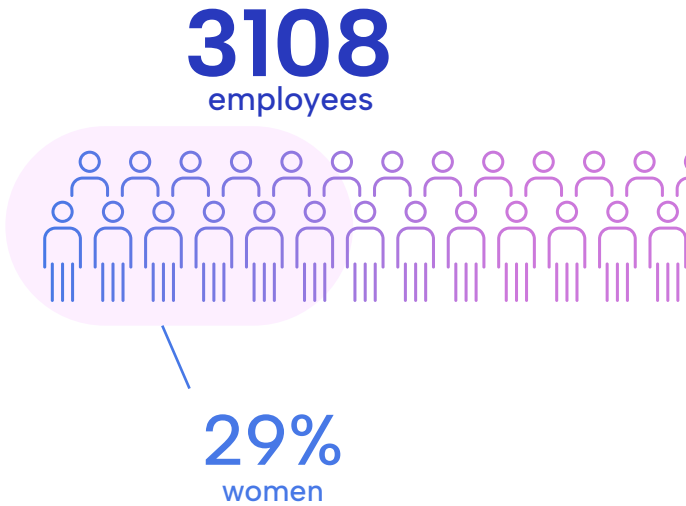
Cromology implements an active policy in favour of gender equality. For example, the proportion of women employees reached 33% in France in 2024.

The Group promotes a work-study programme employment policy, which explains the number of temporary contracts.

Non-employees correspond to temporary workers. Since Cromology’s sales are often influenced by seasonality, hiring temporary workers enables production to be adjusted in line with sales and/or market forecasts.

Characteristics of non-employees	France	Italy	Portugal	Spain	Morocco	Switzerland	Group	Coverage rate
Number of non-employees		16	17	94	55	0	184	100%

As data on the breakdown of non-employees (number of self-employed workers and number of workers provided by external companies) was not available for all entities in 2024, it has not been included in this year’s reporting.





C. Data relating to social dialogue

Employee-related data have been collected at the country level. Since the workforce in France represents approximately 67% of the total headcount, this scope therefore has a significant influence on the Group’s consolidated value.

Social dialogue	France	Italy	Portugal	Spain	Morocco	Switzerland	Group	Coverage rate
Share of employees covered by collective agreements	100	100	100	100	0	100	88*	73%
Share of employees represented by employee representatives	100	28	100	87	100	0	78*	67%

In each country, except Morocco, all employees benefit from social coverage through collective agreements. The majority of them also benefit from an employee representation system. Even in the absence of formal bodies, Cromology is committed to fostering social dialogue and ensuring that every voice can be heard.

In France, the number of meetings with the Business and Social Council is intentionally higher than the regulatory requirement: 10 per year, compared with the legal minimum of 6. This is intended to establish meaningful dialogue and a climate of trust.



D. Data relating to diversity

Cromology’s vision is to bring diversity and inclusion to life: combining differences and fostering success.

Accordingly, since July 2023, a Diversity and Inclusion Manifesto has been created to “promote a culture of diversity and inclusion [...] to strengthen employee engagement, a lever that ultimately contributes to the achievement of growth objectives.”



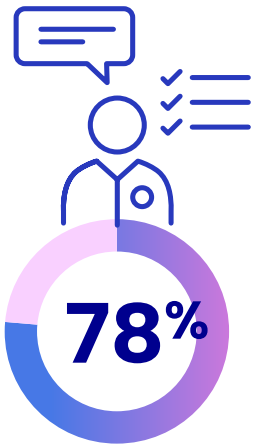
Employees with disabilities	France	Italy	Portugal	Spain	Morocco	Switzerland	Group	Coverage rate
Share of employees with disabilities in the total workforce	5	5	1	1	0	0	3*	67%

The proactive policy on the recognition of persons with disabilities promotes diversity in recruitment and supports employees in successfully managing their roles.



E. Data relating to career development

The annual review between the manager and the employee provides an opportunity to assess not only annual performance but also training needs and internal mobility preferences.



of employees receive regular performance evaluations and career development reviews

Career development	France	Italy	Portugal	Spain	Morocco	Switzerland	Group	Coverage rate
Share of employees receiving regular performance evaluations and career development reviews	94	61	96	87	23	100	78*	67%
Share of women receiving regular performance evaluations and career development reviews	ND	88	100	30	40	100	72*	50%
Share of men receiving regular performance evaluations and career development reviews	ND	53	96	70	21	100	66*	50%

Training	France	Italy	Portugal	Spain	Morocco	Switzerland	Group	Coverage rate
Average number of training hours per employee	15	27	35	21	17	ND	19*	93%
Average number of training hours per employee – Women	11	27	35	29	35	ND	18*	93%
Average number of training hours per employee – Men	17	27	34	21	16	ND	20*	93%

The 67% coverage rate for the indicator “Share of employees receiving regular performance evaluations and career development reviews” is explained by the absence of data from certain entities in France.

The share of employees receiving regular performance evaluations and career development reviews is steadily increasing and has reached record levels in several countries, including Switzerland, France, Portugal and Spain.

The number of training hours is also a closely monitored indicator across all countries. In France, 90% of employees in 2024 benefited from training to strengthen their skills.

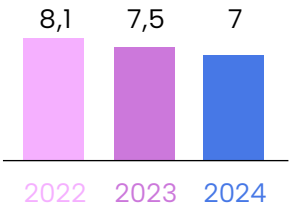


F. Data relating to health and safety

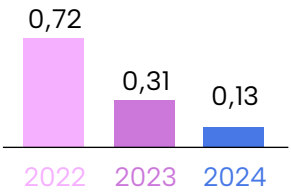
Health and safety data have been collected across all operational sites, highlighting significant issues in this area, including production sites, logistics facilities and points of sale, as well as the offices of all entities that employ staff.

Health and safety	France	Italy	Portugal	Spain	Morocco	Switzerland	Group	Coverage rate
Share of employees covered by a health and safety management system (%)	100	100	100	100	NA	100*	100%	50%
Number of work-related fatalities among employees	0	0	0	0	0	0	0	100%
Number of work-related fatalities among other workers on company sites	0	0	0	0	0	0	0	100%
Number of accidents at work	30	0	4	6	1	1	42	100%
Frequency rate of accidents at work	3	0	5	19	2	7	7	100%
Number of work-related illness cases	19	0	0	0	0	0	19	83%
Number of days lost due to illness, accident or fatality	951	0	108	91	14	14	1 178	100%
Severity rate of accidents at work	0,15	0	0,13	0,29	0,03	0,10	0,13	100%
Number of occupational disease cases among former employees	105	0	0	0	0	0	105	78%

Note: All accidents are taken into account, including those involving employees, temporary workers and external contractors.



Frequency rate of accidents with sick leave



Severity rate of work-related accidents

The accident rate with sick leave has decreased compared with previous years. These improvements result from the initiatives launched in 2022 with the support of DuluxGroup.

Italy holds the record for having no work-related accidents among employees or other workers on Group sites, reflecting excellent results in prevention and safety. The Porcari

site has held the record for more than ten years without an accident.

The severity rate has also declined sharply, confirming the effectiveness of actions undertaken over several years to address serious risks across all Group entities.



G. Data relating to work-life balance

Marriage, civil partnerships, births, moving, and caring for sick children: these types of special leave are part of the company’s leave entitlements, hereafter referred to as family-related leave.

Work-life balance	France	Italy	Portugal	Spain	Morocco	Switzerland	Group	Coverage rate
Share of eligible employees who have taken family-related leave (%)	18	23	20	6	13	9	18*	100%
Share of eligible women who have taken family-related leave (%)	ND	33	21	2	33	10	22*	33%
Share of eligible men who have taken family-related leave (%)	ND	20	20	4	66	9	25*	33%





2 Policies and actions relating to our employees

At Cromology, the ambition is clear: to be a company where everyone feels engaged, valued and proud to contribute, a Best Place to Work, by placing employee engagement at the heart of its strategy.

A. Employee well-being

Health and safety at work

Ensuring employee well-being is Cromology’s primary objective under the “People” Pillar. This aim is achieved through three primary areas.

All Cromology sites have been ISO 45001 certified for several years.

Health and Safety are central to the Group’s concerns, not only for its own employees but also for all temporary workers and

contractors operating on the sites. These three groups are all included in the indicators presented.

Cromology relies heavily on the rigorous Health and Safety standards of DuluxGroup and has incorporated them into a multi-year programme. The management of identified risks is structured around three themes:

Health and Safety			
Thematics	Préventions des désastres	Disaster prevention	Injury prevention
For which risks?	Sites <ul style="list-style-type: none">– Sites– Hazardous products– Work at height, in confined spaces– Electrical risks– Natural disasters Production process safety <ul style="list-style-type: none">– Flammable solvents– Combustible dust	Sites <ul style="list-style-type: none">– Vehicles and forklifts– Falling objects (racks, lifting equipment) Tous <ul style="list-style-type: none">– Driving– Construction site or supplier visits with unknown risks	All <ul style="list-style-type: none">– Manual handling– Sharp objects– Slips, trips, falls on level ground– Hazardous chemicals– Noise– Well-being and mental health
	Basic risks All – Change management, incident management and risk management Site – Risk assessments, daily work permits, emergency plan		



Group audits have been conducted around these themes and have established an action programme called NAP, the Never Again Program. Each site commits to completing a predetermined number of actions at the beginning of the year, which are monitored monthly. This allows the sites to be challenged on the prioritisation of safety actions and to clarify resource requirements.

At the same time, it is each employee’s contribution that enables strong results in risk prevention. Accordingly, Cromology encourages on-site engagement through:

- Reporting by all employees to signal any dangerous behaviour or situation and to correct it.
- Safety discussions or site visits among employees to promote best practices and eliminate unsafe practices.
- Managers deliver safety briefings to raise staff awareness of daily issues or incidents occurring within the Group.

Each entity, therefore, has monitoring indicators for these activities, with monthly targets. The indicators are reviewed monthly at the Group level.

Every year in March, Cromology organises a Safety Day in all countries. On 20 March 2024, the focus was on Traffic Management, meaning the prevention of all risks related to pedestrian, vehicle, truck and forklift traffic.



Communication

Cromology has chosen to adopt multiple communication channels to ensure that employees feel fully integrated within the company.

Department meetings, factory shutdowns, annual reviews, “safety minute” rituals (and many others), any exchanges that allow dialogue between departments are essential tools for fostering strong synergy within the Group and its entities.

In parallel, communications via the intranet (C-We) keep employees informed of Group news and provide access to useful documents, facilitating their daily integration and participation in company life.

The Management Team communicates through periodic Business Update meetings, quarterly Manager Calls, and emails:

the monthly Corporate Pack, quarterly HR Newsletter, and safety and environment Flashes...

On the other hand, staff in all countries are encouraged to report malfunctions or suggest improvements through their managers, satisfaction surveys, or employee representative bodies. Employees are also asked to report abnormal or dangerous situations via quality, environmental and safety incident forms (GLI, or General Learning Incidents).



Work-life balance

The Group establishes rules, activities and initiatives in each country: :

- **Right to disconnect**, established through a charter in January 2024: measures to ensure the right to disconnect are defined in professional equality and quality of work-life agreements across Cromology’s various companies. The aim is to allow employees to disconnect from their professional digital tools and not to be contacted, including through personal communication tools, for professional reasons outside their usual working hours.
- **WELII platform** in France, providing support services for employees in both their professional and personal lives, as well as webinars and online fitness classes for health prevention and well-being.
- **Quality of Work-Life Week** with daily communications throughout the week promoting proactive actions for employee

well-being (posture and movement, ergonomics, relaxation, etc.).

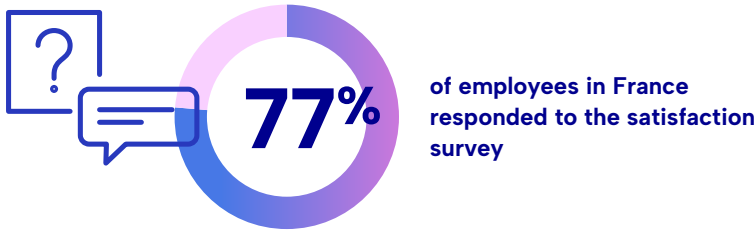
- **Recognition of employees** who share their practices outside the company. In 2024, the Olympic year, “**Cromo athletes**” were highlighted.
- Moroccan teams participated in the **third edition of the “Moroccan Corporate Sports Games”**, held over three days at the end of June 2024. This inter-company competition, featuring eleven disciplines, brought together nearly 2,000 employees from 74 national and international companies (including Total, Safran, IBM...)



Finally, each year, a satisfaction survey is conducted among all Cromology employees in all countries.

This survey serves two purposes: first, to measure employee engagement and satisfaction across multiple areas (strategy, integration, work environment, career opportunities, etc.); and second, to guide actions already initiated in previous years and to create new initiatives where necessary. The aim is to improve employees’ daily experience and to make Cromology a Best Place to Work.

In 2024, 77% of employees in France responded, providing input for action plans across the Group’s various entities, particularly focusing on the areas of Recognition and Communication.





B. Diversity & inclusion – D&I

Promoting Diversity and Inclusion is Cromology’s second objective.

This objective guides decisions and defines the Group’s commitment not only to its employees but also to its clients.

The structure implemented within the Group is based on actions carried out over several years:

- 1. UA policy against discrimination and harassment
- 2. A Manifesto summarising commitments regarding D&I
- 3. A mandatory e-learning awareness module for all employees, with a dedicated module for the Management Team
- 4. The annual gender equality report, highlighting progress made year on year
- 5. Regular communications to employees and participation in the satisfaction survey
- 6. Employee involvement in various important initiatives: DuoDay, Pidiem, Pink October, Movember

These events and communications ensure, on the one hand, that Diversity and Inclusion within the Group are reflected in day-to-day operations, and on the other, that employees are actively involved.





Here are some highlights from 2024

March 2024

- Celebration of International Women’s Rights Day, communicating the commitments of the Executive Committee members and inviting each employee to share their ideas on the topic (photos, videos, written contributions).
- Publication of the gender equality report: Cromology works daily to create an environment that promotes equality and fairness, facilitating training, internal promotion, and the recruitment of women and men with diverse profiles and career paths.

Septembre 2024

UA partnership was established with PIDIEM, which supports companies in occupational health prevention and in dismantling stereotypes related to disability. The aim is to understand perceptions of disability within Cromology and identify levers for improvement to build an even more inclusive work environment. The first phase, completed at the end of 2024, involved conducting interviews with employees and the management team to subsequently develop a disability policy and support the company in its implementation, enhancing health prevention and workplace well-being.



October and November 2024

Raising employee awareness of breast and prostate cancer through involvement with a selected association.



Novembre 2024

Cromology renewed its commitment, initiated in 2022 in France, through the DuoDay initiative, which involves welcoming, for one day, a person with a disability to discover a work environment, clarify a career project, and even begin an integration pathway.

In total, fourteen duos were formed, resulting in as many meaningful encounters with the candidates, thanks to the participation of all employees in points of sale and at production and logistics sites.





C. Attracting and retaining talent

Attracting and retaining talent: the third objective of the “People” Pillar

Remuneration

Cromology aims to maintain a remuneration system that is fair in relation to sector practices.

Each year, negotiations within the company’s subsidiaries result in local collective agreements on salaries, working time, and working hours.

Salaries must also reflect employees’ contributions to the company’s success.

Furthermore, to ensure that everyone is remunerated for their work and collective performance, a company agreement concluded at the France level for the Cromology Group is renewed annually. The purpose is to implement a collective savings system comprising profit-sharing and interest on profits.

Training

To enable each employee to develop professionally, Cromology encourages a range of initiatives for skills development, including teamwork, mentoring, projects, and diverse training programmes.

A training catalogue is offered each year, and the C-learning platform is deployed across all entities, providing both mandatory and optional training. This has improved the training completion rate by simplifying and making the process accessible across all sites.

However, in-person training remains essential for practical work and for exchanges between employees.

Mobilité

Internal mobility is also a key lever of the HR policy: during the first half of 2024, 25% of recruitments were carried out through internal mobility. Within the Group, it is encouraged to explore opportunities to change positions, departments, or even countries. To support this, communications are put in place, including HR newsletters and manager calls.





3 Workers in our value chain

A. Description of impacts, risks and opportunities related to workers in the value chain.

Within its value chain and across the majority of its actors, Cromology is exposed to social risks similar to those identified for its own workforce, but with a more limited degree of control.

Within its value chain and across the majority of its actors, Cromology is exposed to social risks similar to those identified for its own workforce, but with a more limited degree of control.

A smaller portion of its suppliers, particularly those involved in the extraction and processing of raw materials such as pigments and minerals, sometimes operate in regions with less stringent social regulations and are not directly audited by

the company. This situation may lead to violations of human rights, such as child labour or forced labour.

For Cromology, beyond ethical considerations, these risks can lead to supply chain disruptions and critical supply shortages, directly affecting the continuity of industrial operations. They also expose the company to significant reputational risks that could impact its relationships with clients, including end users, partners, and investors.





Description détaillée des impacts, risques et opportunités en lien avec les travailleurs de notre chaîne de valeur

(see [Appendix – Double Materiality Assessment Methodology](#))

			Upstream value chain	Operations	Downstream value chain	Time horizons
Job security	I _P (potential)	Potential economic instability linked to precarious employment contracts for workers in the value chain.	X			CT
	I _N (real)	Psychological and physical effects of difficult, variable working hours on workers in the value chain.	X			MT
Working time	R	Operational and reputational risks arising from supply chain disruptions caused by non-compliance with local working-time regulations, leading to employee strikes.	X	X		MT
	I _N (real)	Risk of economic instability linked to low remuneration affecting the well-being of employees in the value chain.	X			CT
Adequate wages	R	Reputational and operational risk related to supply chain disruptions caused by non-compliance with local wage regulations, leading to employee strikes.	X	X		MT
Social dialogue	I _N (potential)	Professional dissatisfaction and potential tensions due to degraded social dialogue for workers in the value chain.	X	X		CT
Collective bargaining	I _N (potential)	Professional dissatisfaction and potential tensions are linked to the absence of collective bargaining for workers in the value chain.	X			CT
Work-life balance	I _N (potential)	Risk of poor well-being at work and in private life due to a lack of work-life balance, potentially leading to burnout or generally affecting mental health.	X			CT
Health and safety	I _N (potential)	Risk of workplace accidents and fatalities among workers in the value chain.	X			MT
Gender equality and equal pay	I _N (potential)	Gender pay gap for work of equal value, resulting in reduced confidence and well-being among employees in the value chain.	X			MT
Training and skills development	I _N (potential)	Lack of training and skills development in the value chain, affecting employee satisfaction, employability and safety.	X			CT



			Upstream value chain	Operations	Downstream value chain	Time horizons
Employment and inclusion of persons with disabilities	I _N (potential)	Feelings of exclusion among value chain employees and limited professional opportunities for candidates due to unsuitable recruitment practices.	X			MT
Measures against workplace violence and harassment	I _N (potential)	Risks of harassment and discrimination in the workplace, affecting the mental health of employees in the value chain.	X			MT
Diversity	I _N (potential)	Feelings of exclusion among value chain employees and limited professional opportunities for candidates due to unsuitable recruitment practices.		X		MT
Child labour	I _N (potential)	Risk of child labour in Cromology's value chain, reducing the freedoms and rights of those concerned.		X		CT
Forced labour	I _N (potential)	Risk of forced labour in Cromology's value chain, reducing the freedoms and rights of those concerned.		X		CT
Private life	I _N (potential)	Endangerment of value chain workers in the event of identity theft and commercial harassment in the event of a data breach.		X	X	CT



Policies

- All policies in the integrity and compliance section (see Policies and actions related to integrity and compliance).
- The responsible purchasing policy and the partner code (see the sections Building sustainable partnerships with our customers and suppliers and Actions with our suppliers related to responsible purchasing).
- Modern slavery prevention
- Policies related to communities

Modern slavery prevention

DuluxGroup, our shareholder, has issued a statement every year for the past five years in accordance with the Australian Modern Slavery Act 2018. This statement describes the structure, activities and supply chain, as well as the modern slavery risks within operations and throughout the supply chain, the measures taken to address these risks, and our assessment of the effectiveness of these measures. Cromology is included within the scope of this statement.

Risk assessment

The SEDEX Radar risk assessment tool is used to evaluate risks related to modern slavery. This tool incorporates modern slavery risk factors across the entire DuluxGroup scope, including Cromology.

The risks are associated with the procurement of goods and services in certain higher-risk regions. This risk is managed and framed through the partner code of conduct.

In addition, our main suppliers are generally large multinational companies operating within our areas of activity. These companies assess the risks of modern slavery within their own operations and across their supply chains, and implement control measures to mitigate them.

Thanks to the established, direct relationships we maintain with our key suppliers, they benefit from predictability and stability. It enables them to provide the same to the workers within their operations and throughout their supply chains, thereby helping to mitigate modern slavery risks.



B. Description of impacts, risks and opportunities related to local communities

Although no material impact, risk or opportunity has been identified regarding the requirements of **ESRS S3 – Affected Communities**, Cromology nevertheless recognises its role in supporting local economic development. The company contributes to employment dynamics in the regions where it operates, including in economically less active areas, by creating job opportunities for local populations.

This matter has been considered specific to Cromology and assessed in terms of social impact and financial significance. By supporting local employment, Cromology strengthens its regional presence, enhances its brand image, and benefits from lower recruitment costs as its sites become more attractive to local talent.

Detailed description of impacts, risks and opportunities related to local communities

		Upstream value chain	Operations	Downstream value chain	Time horizons
Local roots	I _p (rea)	Job creation in economically less active areas, facilitating access to employment in these regions.	X	X	CT
	○	Reduction in turnover and recruitment costs thanks to local integration: presence in regions such as Savoie helps strengthen employee retention due to the limited availability of alternative employment opportunities.		X	MT
	○	Increased attractiveness of Cromology through initiatives that reinforce local anchoring in the areas where its sites operate.		X	MT
	○	Development of local partnerships and initiatives (with municipalities, schools), strengthening engagement and fostering a sense of pride and belonging.		X	LT

Cromology is also committed to supporting the local economy through partnerships and sponsorship initiatives. The company encourages its employees to take part in associative initiatives, whether local or national, by providing concrete support. This commitment takes various forms, including financial assistance, donations of

paint or services, all benefiting associations working in diverse fields such as support for vulnerable people, heritage preservation, sport, or educational projects.





C. Data relating to communities

The communities involved remain very limited. Neighbours living close to the sites may occasionally be negatively affected by noise or dust emissions, in a very punctual and exceptional manner.

Cromology is ISO 14001 certified and complies with all operating decrees. Industrial and logistics sites control environmental impacts, including air, water, and soil emissions, as well as noise. See the section Planet pillar.

Example of a positive impact on local communities: in Morocco, the company Arcol installed lighting in the neighbourhood and renovated the nearby road.



D. Positive impacts of our products and services

Durability: [see Waste recycling, circular economy and responsible products.](#)

The company generates sales from products that provide durable protection for painted surfaces. It also offers customers materials and equipment for external wall insulation. These products enhance public spaces through painting and local initiatives.

Cromology fosters real spaces for engagement between sales teams and local craftspeople, notably through training sessions and the sharing of technical expertise in points of sale and on the many worksites where our employees operate.

E. Positive impact on employment

Cromology develops and maintains local employment through its store networks, factories and logistics platforms. The Group also works with local suppliers and companies employing people with disabilities. This includes product labelling, green space maintenance, and waste collection and sorting.



F. Partnerships

In Italy, Cromology has supported child-related associations for many years, including i Bambini delle Fate (supporting autistic children and their families) and Colori Per La Pace di Stazzema (an exhibition showcasing drawings by hundreds of thousands of children from 134 countries).

The Italian teams also support several associations through product donations aimed at improving living spaces and promoting social or educational reintegration (for example, the Fondazione Dynamo Camp Onlus, which provides free recreational programmes for children with serious illnesses, Cose e persone, Nanina, and others).

They have also taken part in urban redevelopment initiatives, such as collaborating with the artist Massimo Sirelli during the Catanzaro ColorFul Event, during which around 100 concrete breakwaters in the Catanzaro port area were painted. Another example includes a project to redevelop disadvantaged neighbourhoods in the city of Cosenza.

Social or environmental initiatives are also offered to employees, such as the partnership with the Klaxit car-sharing platform and the toy collection organised for the Restos du Cœur just before Christmas.

At Cromology, promoting art and culture is a strong priority, as demonstrated by the many partnerships established over the years. In France, through the Tollens brand, these include collaborations with the Musée d’Orsay and the Musée de l’Orangerie in Paris, the Musée La Piscine in Roubaix, the Château de Chantilly, and the Musée d’Art Moderne et Contemporain in Saint-Étienne.



Musée d’Orsay à Paris, exposition Pastels de Millet à Redon



Œuvres de l’artiste Massimo Sirelli



Cromology offers paints to private and public institutions.

Committed to Les Bricos du Cœur’s mission and actions, Cromology chose to support the association by donating* paint.

The organisation aims to “help those who help others” by carrying out solidarity-based refurbishment projects and donating products to its partner structures (associations, foundations, hospitals, care homes, etc.).

In 2024, the association received a donation of 1,193.5 litres of paint.



A partnership agreement is currently being drafted and will take effect during 2025, paving the way for regular donations

* Paint donations concern DIY products for which there is no prospect of commercial sale.

Regarding donations, Cromology considers the following elements: cash donations, time dedicated, the number of employees involved, the volume of paint, and the value of products donated.

2024 figure :

- Value of products donated: €10,119
- Quantity of paint: 7,650 litres
- Number of employees involved: 170
- Hours dedicated: 62

Example of a humanitarian initiative

In 2023, a national sales challenge rewarded the best salespeople with a trip to Morocco in 2024. One day of the trip was dedicated to a humanitarian action following the earthquake that struck the country. Activities included clearing rubble and collecting waste.

Reforestation initiative

In 2024, Tollens launched the Soin du Bois range, designed to protect and enhance wooden surfaces while remaining environmentally responsible. At the same time, the company committed to supporting reforestation through a partnership with the American NGO One Tree Planted: for every pot sold, one tree is planted.



In 2024, a donation of \$18,189 was made to the NGO, enabling the planting of 18,189 trees in Uganda’s Albertine Rift region. This initiative aims to preserve local forests, recognised as one of the 200 most important ecosystems in the world for biodiversity conservation, and to provide essential habitat for the region’s chimpanzees, a key species for maintaining the balance of this fragile ecosystem. Moreover, the project supports local communities by providing employment opportunities in reforestation work and by promoting the sustainable management of natural resources.

The 18,189 trees planted represent a significant area, equivalent to several football pitches, contributing to soil restoration, climate regulation, and the protection of the region’s unique biodiversity.

The partnership with One Tree Planted continued throughout 2025, with the ambition to strengthen this positive impact and involve even more customers in the initiative. Thanks to their engagement, each pot sold becomes a tangible action for the planet

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1 Building sustainable partnerships with customers and suppliers

The company manages its relationships with suppliers with a clear priority on risk management and supply chain sustainability.

Local suppliers are favoured, which supports regional development and contributes to environmental objectives. Supply chains identified as more vulnerable receive tailored support. Performance is assessed through audits, supplier surveys, and on-site visits, enabling continuous improvement and closer alignment with sustainability goals.

Strategic suppliers are evaluated each year according to several criteria, including their social and environmental responsibility commitments. During the annual review of the procurement process, decisions are taken on which suppliers will undergo an on-site audit. An audit report is issued and, depending on the results, the supplier may be required to implement a corrective action plan. Procurement processes are certified under the ISO 9001, ISO 14001, and ISO 45001 standards.

Cromology has formalised its CSR requirements in a partner code of conduct. This code is shared with all suppliers, and the Procurement Department requires suppliers to sign it as confirmation of their commitment to meeting its requirements. The code sets out expectations and obligations regarding:

- human rights, skills development, and respect for employees
- integrity, health and safety, and environmental footprint
- innovation for more sustainable products and services
- monitoring of commitments across their own employees and subcontractors
- reporting of any conduct that breaches the code of conduct

Partner code of conduct

To ensure sustainable development, Cromology expects its suppliers to:

- comply with high standards of social and environmental responsibility,
- conduct their activities fairly and transparently, in accordance with applicable laws and ethical norms.





A. Impacts, risks, and opportunities related to our customers

Who are our customers?

- 1. Individual consumers (DIY enthusiasts/private customers): Individuals who purchase paint for personal home use, including decoration, maintenance, and small renovation projects.
- 2. Building and painting professionals: Painters, contractors, and small businesses using Cromology products in their professional activity.
- 3. Key accounts and institutional clients: Construction companies, real estate operators, and industrial customers purchasing large volumes for various projects.
- 4. Distributors and retailers: Stores and distribution chains selling Cromology products to end users.
- 5. Local communities: Populations living near production sites or logistics centres. The company also develops close relationships with professional painters through training and technical support.

Cromology faces a range of challenges in its relationships with customers and end users.

The protection of personal data represents a significant risk. A cyberattack resulting in the leak of confidential information could negatively impact the company’s reputation and undermine customer trust.

Customer health and safety are also a critical area of attention, particularly regarding the presence of potentially hazardous substances in certain products. Clear and transparent communication is therefore essential to ensure the safe use of paints. Insufficient information about chemical components or safety precautions could jeopardise user health and expose Cromology to legal or reputational risks.

However, these challenges also create opportunities. By developing innovative and more sustainable paint ranges that, for example, contribute to improved indoor air quality, Cromology can strengthen its competitiveness and gain market share while meeting increasing customer expectations regarding safety, transparency and sustainability.



Detailed impacts, risks and opportunities related to our clients

(see [Appendix – Double Materiality Assessment Methodology](#))

			Upstream value chain	Operations	Downstream value chain	Time horizons
Private life	R	Reputational risk in the event of a cyberattack leading to the leakage of customers' personal data.		X	X	MT
	I _N (potential)	Insufficient information on products, compromising the health and safety of customers and users (for example, lack of warnings regarding necessary precautions or inadequate communication concerning hazardous substances contained in paints).				MT
Health and safety	I _N (potential)	Adverse effects on the health and safety of customers due to toxic substances present in paints.			X	MT
	I _N (potential)	Adverse effects on the health and safety of customers in the event of quality failures.			X	MT
	R	Legal and reputational risks that may arise from incidents affecting customers' health (illnesses linked to exposure to hazardous products, death).		X	X	CT
	O	Market share gains through products that have a positive impact on indoor air quality (for example, by absorbing indoor pollutants)			X	MT





B. Policies and actions relating to our customers

The information technology charter is designed to address the risks of cyberattacks and data leakage effectively..

The information technology charter sets out all provisions, tools, and security measures implemented to protect the company and its stakeholders against cyberattacks and data breaches.

The security measures cover the following areas:

- Confidentiality rules
- Reinforced URL filtering for high-risk websites
- Removal of “administrator” rights on computers
- Mandatory two-factor authentication for all users (MFA)
- Rules governing the connection of external devices to the Information System
- Rules regarding cyberattacks
- Rules regarding internal and external communications

The charter also details the controls applied to the Information System and the sanctions applicable in the event of non-compliance.

Policies relating to the health and safety of paint users.

996% of the Group’s paints are water-based, significantly reducing risks to users. As a general rule, Safety Data Sheets (SDS) are made available to users so that they may take the necessary precautions to safeguard their health.

The Regulatory Affairs department, supported by the R&D department, systematically updates the Safety Data Sheets (SDS). These are available on the Quick-FDS website: a secure platform for the regulatory transmission of SDS.

The safety of paint users also relies on customer training. The technical teams therefore provide regular training to customers on good application practices, including safety practices such as the use of personal protective equipment and appropriate ventilation of indoor spaces, particularly when applying products containing organic solvents.

The chemical substitution programme

The R&D department works continuously to replace chemical substances with less hazardous alternatives. The R&D team manages a chemical substitution programme covering between 10 and 15 substances per year, to ensure increasingly safe paints. A monthly technological monitoring identifies changes in the classification of the raw materials used.

Through intensive reformulation work on colourants carried out by the R&D teams, Cromology has brought its full range of water-based colourants to market, free of any “danger” pictogram, in accordance with the CLP Regulation*.

*Classification, Labelling and Packaging of substances and mixtures (CLP Regulation)





The Ecovadis Commitment

Cromology responds to the EcoVadis questionnaire. In 2024, the Group received the Gold Medal with a score of 75/100, placing Cromology within the top 5% of the most responsible companies assessed worldwide (96th percentile). This distinction, awarded by EcoVadis, one of the world’s leading independent platforms to evaluate corporate social and environmental responsibility performance, demonstrates Cromology’s commitment to sustainable development. Through this rigorous assessment, EcoVadis examines several CSR pillars, including the environment, responsible procurement, business ethics, and human rights.

Customer listening

The Group develops its customer-listening practices through:

- Visits carried out by the sales teams,
- In-store customer welcome and support,
- The preparation of commercial contracts,
- Customer satisfaction surveys,
- Technical support,
- Training on products, applications, and external thermal insulation,
- The signing of contracts.

In addition, Cromology applies procedures that ensure compliance with customer and end-user requirements in accordance with the ISO 9001 standard:

- Commercial management procedure
- Contract and agreement procedure
- Complaint handling procedure
- Returns management procedure

Furthermore, Cromology has several tools to assess and collect feedback from end-users and consumers.

Net Promoter Score (NPS) surveys are used to assess the recommendation and satisfaction levels of all key customer seg-

ments (retailers, professional painters and painting contractors, and specifiers) based on several key performance indicators.

The NPS makes it possible to assess customer satisfaction with regard to criteria relevant to commercial activity.

Finally, Cromology formalises regular feedback through the “market monitoring study”, which makes it possible to assess how well the product offering aligns with customer requirements.

Policies related to product sustainability and quality

See Policies and actions relating to the circular economy and responsible products

See Ensuring product and service quality



2 Integrity and compliance



A. Description of impacts, risks, and opportunities related to integrity and compliance

Regarding integrity and compliance, Cromology faces several key issues that may affect its ecosystem and economic performance. Firstly, the absence of a homogeneous corporate culture represents a potential risk, leading to reduced employee well-being, a lack of team cohesion, and a loss of attractiveness relative to competitors. In an international Group with a decentralised organisation, the absence of a shared corporate culture also constitutes an operational risk that could affect productivity and product quality. It may even result in the loss of talent.

Furthermore, the management of supplier relations exposes the company to significant reputational and legal risks. Cromology may be indirectly associated with human rights violations, environmental harm, or corrupt practices when its suppliers operate in high-risk contexts. However, establishing responsible, sustainable partnerships with suppliers represents a strategic opportunity: it not only helps secure supplies but also reduces costs while strengthening the company's ethical reputation.

Finally, the risk of corruption poses a significant threat to Cromology, both legally and reputationally. Incidents involving unfair business practices or bribery could undermine stakeholders' trust and disrupt market functioning. Strengthening corruption prevention and detection mechanisms is therefore essential to preserve the company's integrity and maintain a fair commercial environment.



Detailed description of impacts, risks and opportunities relating to integrity and compliance

(see [Appendix – Double Materiality Assessment Methodology](#))

			Upstream value chain	Operations	Downstream value chain	Time horizons
Corporate culture	I _N (potential)	Reduction in employee well-being due to a heterogeneous corporate culture, exacerbated by the absence of a governance structure.		X	X	MT
	R	Loss of talent to competitors and loss of market share resulting from a lack of a coherent and shared corporate culture across the company, negatively affecting productivity and product quality.		X		MT
	O	Improvement in employee productivity, leading to increased revenue and market share gains.		X		MT
Management of relationships with suppliers	I _N (potential)	Risk of harm to human rights, the environment, and individuals arising from the fact that Cromology collaborates with suppliers who may be exposed to high risks relating to the environment, labour rights, safety, and corruption.	X	X		LT
	O	Creation of value through strategic partnerships with suppliers, aimed at reducing costs while securing the supply chain on sustainability issues.				LT
Incidents of corruption, prevention and detection	I _N (potential)	Disruption of corporate culture and market behaviour linked to unfair business practices and corruption.	X	X	X	MT
		Reputational and legal risks arising from incidents of corruption and bribery	X	X	X	MT





B. Data relating to integrity and compliance

Data on integrity and compliance have been collected at the Group level and at the country level to account for the specific characteristics of each national context.

The positions most exposed to corruption risks are those in procurement, sales, finance, and executive management, due to their interactions with third parties and public authorities. Increased vigilance is maintained during negotiations, contract approvals, and payments, particularly in areas with higher corruption risks.

Prevention and detection of corruption and bribery	France	Italy	Portugal	Spain	Morocco	Switzerland	Group	Coverage rate
Proportion of employees trained in anti-corruption and anti-bribery measures (%)	100	100	100	ND	100	100	100	86%
Proportion of high-risk functions trained in anti-corruption and anti-bribery measures (%)	100	100	100	ND	100	100	100	86%
Proportion of members of the highest governance body who have completed training on corruption and bribery (%)	100	100	100	ND	100	100	100	86%
Cases of corruption or bribery	France	Italy	Portugal	Spain	Morocco	Switzerland	Group	Coverage rate
Number of confirmed cases of corruption and bribery	0	0	0	0	0	0	0	100%
Number of convictions for violations of anti-corruption and anti-bribery laws	0	0	0	0	0	0	0	100%
Payment practices	France	Italy	Portugal	Spain	Morocco	Switzerland	Group	Coverage rate
Average payment period (days)	ND	98	50	ND	90	60	75	57%
Standard payment terms – proportion of payments aligned (%)	ND	95	100	ND	98	80	93	57%
Number of legal proceedings for late payment	ND	0	0	ND	0	0	0	57%



C. Policies and actions relating to integrity and compliance

Corporate Culture

Cromology promotes a responsible corporate culture founded on integrity, fairness, inclusion, transparency, and data protection. The Executive Committee in each country validates the central compliance policies (anti-corruption, competition, whistle-blowing, GDPR, etc.). It regularly addresses these matters within the framework of governance and risk management. Management actively supports this culture by approving policies, defining expectations, and encouraging transparency.

This culture is reinforced through mandatory online training, targeted training sessions, internal communications, and tools such as a whistle-blowing platform and third-party verification procedures.

The effectiveness of this cultural framework is assessed through training completion rates, alert analysis, and policy reviews, thereby ensuring continuous improvement and employee engagement.

Stakeholder interests

All policies are designed to protect the interests of stakeholders and the company. When developing business conduct

policies, the interests of key stakeholders, including employees, business partners, and customers, are taken into account. This consideration is reflected in the analysis of ethical, legal, and operational risks that may affect them, as well as in internal consultations conducted with the Human Resources and Legal departments. Regulatory requirements, corporate social responsibility expectations, and international standards are also incorporated. The compliance framework, including the whistle-blowing platform, demonstrates the company's commitment to protecting stakeholders from unethical behaviour.

Availability of policies for relevant stakeholders

Business conduct policies are made available to all relevant stakeholders.

Internally, policies are accessible via the company intranet and are systematically communicated whenever new policies are issued or existing ones are updated. They are also integrated into the onboarding process to ensure new employees are informed from day one.

Externally, expectations are communicated through the Partner Code of Conduct (see Establishing sustainable partnerships with our customers and suppliers).

Scope of business conduct policies

The business conduct policies and the employee code of conduct apply to all company activities in France, Italy, Spain, Portugal, Switzerland, Belgium, and Morocco.

Policy dissemination and training on business conduct

The Group has implemented a comprehensive training policy on business conduct to ensure that all employees understand and comply with ethical and legal standards. Training is mandatory for all new employees during onboarding and is regularly refreshed. It is provided to all staff, with additional specialised sessions for high-risk roles such as purchasing, sales, and finance. Training covers key topics including anti-corruption, data protection (GDPR), conflicts of interest, competition law, diversity and inclusion, cybersecurity, safety, and environmental best practices.

Key performance indicators – training	2024
Percentage of employees trained in anti-discrimination and anti-harassment	80%
Percentage of employees trained in anti-corruption and bribery (anti-corruption training)	79%
Percentage of employees trained in business ethics (best practices in competition)	90%
Percentage of employees trained in information security	47%
Percentage of employees trained in the data protection programme	94%



Training is delivered through online learning modules and in-person workshops. Training materials are regularly updated to reflect regulatory changes and emerging risks.

Training monitoring is centralised, with reminders and follow-up measures for non-compliance. Feedback is encouraged to improve training effectiveness. This training policy ensures a consistent commitment to ethical conduct and compliance across the company.

Policies

These policies are designed to prevent legal, reputational, and operational risks.

Together, these policies aim to create a robust framework that safeguards the Group’s ethical standards, legal compliance, and reputation, while fostering trust among employees, partners, and stakeholders.

The Group Legal Department drafts, updates, and deploys the following policies and procedures across the Group:

- A “responsible purchasing” charter (see Establishing sustainable partnerships with our customers and suppliers)
- Third-party assessment procedure
- Employee code of conduct
- Policy and procedure for managing whistle-blowing
- Conflict of interest policy
- Anti-corruption risk prevention policy
- Gifts and entertainment policy
- Competition policy

- Data collection and processing charter or policy
- Whistle-blowing collection and management system
- Anti-harassment and anti-discrimination policy

These policies and procedures may vary from country to country to account for local specificities.

Monitoring processes combine training, declarations, audits, reporting mechanisms, and enforcement measures to ensure adherence by internal and external stakeholders, within a continuous improvement framework.

Fair competition policy

Cromology believes that fair competition provides consumers with more choices and promotes higher-quality products and services at the most equitable price, ultimately fostering greater innovation.

In line with this commitment, Cromology makes business decisions independently of other market actors (suppliers, customers, distributors) and ensures that it does not undermine fair competition.

Anti-corruption risk prevention policy

The company has formalised an anti-corruption risk prevention policy in compliance with the French SAPIN II law.

Actions follow the recommendations of the French anti-corruption agency (AFA). These standards serve as the basis for developing and implementing our policies and help ensure responsible, ethical business practices.

This policy aims to prevent, detect, and address all forms of corruption. It sets out clear rules regarding gifts and invitations, conflicts of interest, facilitation payments, and interactions with public and private officials.

Within the Group, the functions most exposed to corruption risks are:

Purchasing: These teams are responsible for selecting and managing suppliers. Their activities present an increased risk, particularly in the context of a request for proposals.

Sales: These teams face risks related to the incitement or facilitation of transactions that could be perceived as acts of corruption. In some areas of the world, corruption



risks are higher, particularly where laws are less strict or poorly enforced. The Group identifies these high-risk areas through internal assessments and has implemented enhanced controls and specific third-party due diligence.

Gifts and invitations policy

Within the context of our professional activities, exchanging gifts or invitations may help maintain business relationships. However, such practices must remain transparent, reasonable, and consistent with our commitments to integrity. This policy aims to encourage the adoption of appropriate behaviours to prevent the risk of corruption, conflict of interest, or harm to the company’s reputation.

Conflict of interest management procedure

Since 2020, Cromology has deployed its conflict of interest management procedure, which includes a declaration form. Every employee must complete the declaration form:

- When selecting a new customer or supplier;
- At any time when a change in personal or professional circumstances may create a conflict of interest;
- At the request of the Compliance Officer or the Ethics Committee.

If a conflict of interest is confirmed based on the declarations, the Legal and Compliance department contacts the declarant to identify the measures to address the situation. The Compliance Officer may decide to consult the Ethics Committee to make a decision if necessary. The decision is formalised in written minutes.

Mechanisms for identifying and investigating unlawful behaviour

A whistle-blowing platform is accessible to all internal and external stakeholders, including employees, subcontractors, and partners.

<https://cromology.integrityline.fr/>

It enables anonymous reporting of concerns relating to corruption, discrimination, harassment, conflicts of interest, and any other improper behaviour. Reports are handled by a team dedicated to ethics, in accordance with a rigorous investigation procedure that guarantees confidentiality, impartiality, and protection of the whistle-blower against retaliation. Upon receipt of a report, designated compliance officers conduct a preliminary analysis, followed by an internal investigation if necessary. This process ensures confidentiality, impartiality, and traceability. Corrective measures and/or disciplinary sanctions are applied when violations are confirmed, and follow-up actions are implemented to prevent any recurrence. These procedures comply with legal requirements and are regularly assessed for effectiveness.

Whistleblower protection policy

A whistleblower protection policy has been formalised. This policy ensures that any person, whether internal or external to the company, can report concerns in good faith without fear of reprisal. It guarantees the

confidentiality of the whistleblower’s identity, provides secure reporting channels (via the anonymous reporting platform), and sets out clear procedures for the handling and review of reports.

Risks associated with non-compliance with GDPR requirements

A GDPR Committee is in place within the Group in countries subject to European legislation. A designated representative is appointed for each category of risk. A data processing register is maintained and updated regularly, and precautionary measures have been implemented.

Training programmes for employees have also been deployed.

Morocco applies Law 09-08, which is equivalent to European regulations.





Partner assessment procedure.

This assessment procedure is one of the pillars of the anti-corruption risk prevention policy. Before entering into a business relationship with a partner, appropriate and proportionate preliminary checks must be performed, particularly concerning

the partner’s integrity (“due diligence”), taking into account the partner’s specific circumstances. Cromology conducts a risk analysis of the third party’s exposure to corruption and, where necessary, assesses its integrity.

A	1 – Classification of third parties
	2 – Country: Whether the country in which the third party is established, or in which activities will be carried out, is perceived as having a high level of corruption
	3 – identification of warning signs
B	Depending on the assessed risk level, Cromology proceeds differently based on exposure, ranging from a simple questionnaire to a series of verifications that may result in an investigation outsourced to a specialised firm. Cromology reserves the right to request specific commitments or to end the business relationship if necessary.
	Cromology has established a process for supervising third-party assignments and payment arrangements. The contract specifies, in particular, the provisions relating to the prevention of corruption risks. This process sets out the monitoring of the business relationship and the retention of documents.
C	
Contractual framework and monitoring	

Contractualisation

Supply contracts also include clauses relating to the GDPR, labour law, and the prevention of corruption risks.

Cromology also conducts audits to ensure that production conditions comply with current regulations and best-practice standards.

Code of conduct for employees

This Code serves as a common reference for all employees, regardless of their role, hierarchical level, or place of work. A genuine compass for our daily decisions, it encourages us to act responsibly, fairly, and in line with our values. It is composed of three parts.

Our integrity

- Act ethically to protect our reputation. Prevent corruption risks and regulate gifts and hospitality.
- Avoid any situation that may create a conflict of interest.
- Ensure fair and lawful competition. Comply with export regulations and international sanctions..

Our employees

- Value and respect each individual.
- Ensure health, safety, and environmental protection.
- Promote fairness and diversity and combat all forms of harassment.

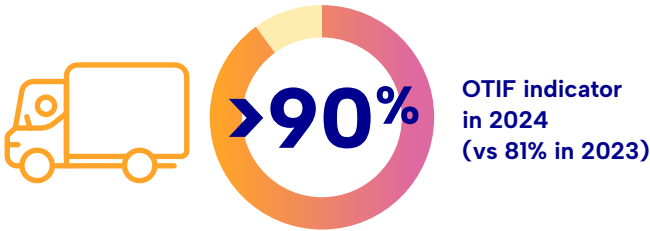
Our assets and information

- Protect the company on a daily basis.
- Act with integrity: prevent, detect, and refuse any form of fraud.
- Maintain the confidentiality of information and personal data.
- Protect our assets: trademarks, patents, formulas, data, and professional tools.
- Ensure cybersecurity and the protection of our information systems.
- Communicate responsibly on social media and in all external communications.



3

Description of impacts, risks and opportunities



A. Description des impacts, risques et opportunités

Although no material impact, risk or opportunity has been identified concerning the requirements of the ESRS standard, Cromology recognises that the quality of products and services is a key expectation of our stakeholders. Customers expect products that are reliable, durable, available in sufficient quantity and delivered within contractual deadlines.

Cromology recognises that non-compliant products have a significant impact on how customers apply our products. Any potential product recalls also affect construction delays, carriers involved in product returns, and waste generation. Conversely, reliable and available products are decisive factors in building customer trust and developing long-term partnerships.

Policies and actions

ISO 9001 policy

All industrial and logistics sites are ISO 9001-certified.

Formulas and procedures within the quality management system ensure reproducible batches. Internal laboratories verify batch quality.

In addition to laboratory controls, the quality management system monitors a series of performance indicators:

- “First-time-right” rate
- Compliance rate
- Rate of waivers
- Monitoring of customer complaints

These indicators are monitored daily at industrial sites and reported monthly. Action plans are led and monitored by the Group Quality Manager during regular meetings. The Quality Manager reports on performance during Supply Chain reviews.

Service rate – OTIF

Cromology monitors the OTIF* indicator to assess the performance of its Supply Chain.

This indicator is reviewed weekly, and continuous improvement plans are implemented. OTIF improved significantly in 2024, notably due to capacity and human-resource investments, exceeding the minimum threshold of 90% (compared with 81% in 2023).

(*) “On Time” means delivering products within the agreed deadlines, while “In Full” means that all goods must be delivered in full quantity, without any omission or error.

All quality processes are discussed during the management review of each Group entity’s Quality Management System.



Planet

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Waste recycling, circular economy and responsible products

A. Description of the impacts, risks and opportunities related to the circular economy and responsible products

The sustainable management of resources and the development of responsible products represent significant challenges for Cromology.

The use of raw materials, which are often of fossil or mineral origin, raises environmental, social and economic concerns, particularly regarding dependence on non-renewable resources, supply security and waste management. At the same time, finished products generate outgoing flows (unused paint, packaging, residues) which, if not properly controlled, may have negative impacts on the environment.

These issues also expose Cromology to regulatory, financial, reputational, and supply-related risks in a context of resource scarcity and increasingly stringent legislative frameworks. They also present opportunities to transition towards more resource-efficient and circular models, in line with Cromology’s growing commitment to more responsible products.





Description of the impacts, risks and opportunities related to the circular economy and responsible products

(see [Appendix – Double Materiality Assessment Methodology](#))



			Upstream value chain	Operations	Downstream value chain	Time horizons
Resource flows, including the use of resources	I _N (real)	Increase in the price of raw materials (pigments, solvents, resins) in the event of shortages or speculative market movements.	X	X		CT – MT
	I _P (real)	Risk of dependency on specific components and/or suppliers in the event of political tensions, depletion of resources, or regulatory changes.	X	X		MT – LT
	R	Gain in market share through the use of sustainable raw materials (bio-based pigments, low-impact solvents), enabling differentiation from competitors.	X	X		MT – LT
	R	Reduction in purchasing costs through the recycling/re-use of raw materials and packaging in products.	X	X		MT
	O	Production of waste related to the use of paint due to insufficient product circularity (e.g. remaining paint not reused in pots).		X	X	MT
	O	Implementation of paint-waste collection systems at points of sale, regardless of the origin of the products (including those of competitors).		X		MT – LT
Resource outputs – Products and materials	I _N (real)	Risk associated with the strengthening of regulations on the management of hazardous waste, requiring Cromology to take responsibility for all hazardous waste generated by the company and its customers.			X	CT
	I _P (real)	Cromology's paint production generates a significant quantity of hazardous and non-hazardous waste, originating from both its own operations and its entire value chain.			X	CT
	R	Donation of defective or unsold products to charitable organisations.		X	X	MT – LT
Resource outputs – Waste	I _N (real)	Risk of increased costs associated with the treatment of hazardous waste.	X	X	X	CT
	I _P (real)	Regulatory risk in the event of inadequate waste treatment or the release of toxic substances into the environment.			X	CT
	R	Reduction in destruction-related costs for non-compliant products through their re-use, sale at a reduced price, or donation.		X		MT – LT
	R	Decrease in plastic consumption thanks to new types of packaging.		X	X	MT – LT
	O	Réduction des coûts liés à la destruction des produits non conformes grâce à leur réutilisation, à la vente à prix réduit ou au don.		X		LT
	O	Diminution de la consommation de plastique grâce à de nouveaux types d'emballages.		X		LT



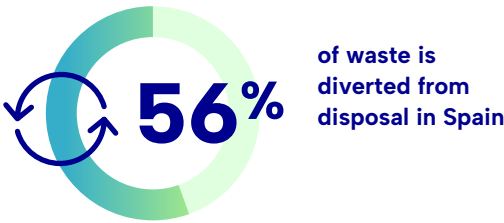
B. Data relating to the circular economy, responsible products and waste

Data on inbound resources (raw materials, consumables, packaging, etc.) are collected centrally at the Group level by the Purchasing Department, which manages and consolidates the volumes and types of resources purchased from suppliers.

This approach provides a consolidated view of procurement and facilitates monitoring of optimisation levers (reductions in consumption, material substitutions, responsible purchasing, etc.).

Data on outbound resources (waste) is collected at the operational level and covers all industrial sites, logistics sites, and retail outlets in the relevant countries. This decentralised collection enables close monitoring of local performance, identification of site-specific improvement levers (reduction, reuse, recovery, recycling), and traceability of physical flows.

Inbound resources	Group
Total weight of products and materials (tonnes)	159 285
Percentage of biological materials (%)	2%
Absolute weight of secondary components reused or recycled, secondary intermediate products and secondary materials (tonnes), excluding water	2 051
Percentage of components, intermediate products and materials reused or recycled at the secondary level (%)	50



Some data on waste diverted from disposal and designated for disposal, as required by the CSRD, were not available.

A breakdown of waste for which the end of life is unknown has therefore been added at the end of the table. This breakdown shows the difference between the total quantity of hazardous

and non-hazardous waste generated in each country and the quantity of waste for which a treatment route (recovery or disposal) has been identified.

As previously indicated, Cromology has set itself the objective of publishing comprehensive data compliant with the requirements of the

CSRD by 2028. The coming years will be dedicated to strengthening the reliability of monitoring waste recovery and disposal routes, with particular attention paid to French sites and non-hazardous waste.



	France	Italy	Portugal	Spain	Morocco	Switzerland	Group	Coverage rate
Outbound resources								
Total quantity of waste generated (tonnes)	4 745	1 785	492	969	260	11	8 262	100%
Total amount of hazardous waste (tonnes)	588	458	33	373	60	8	1 520	100%
Total amount of radioactive waste (tonnes)	0	0	0	0	0	0	0	100%
Total amount of non-hazardous waste (tonnes)	4 158	1 327	458	595	200	3	6 742	100%
Waste diverted from disposal								
Hazardous waste diverted from disposal due to preparation for reuse (tonnes)	229	398	0	0	0	0	627	100%
Hazardous waste diverted from disposal through recycling (tonnes)	209	0	0	345	2	0	556	100%
Hazardous waste diverted from disposal through other recovery operations (tonnes)	0	0	2	0	58	0	60	100%
Hazardous waste diverted from disposal (tonnes)	438	398	2	345	60	0	1 242	100%
Non-hazardous waste diverted from disposal due to preparation for reuse (tonnes)	0	0	55	0	0	0	55	100%
Non-hazardous waste diverted from disposal through recycling (tonnes)	426	560	0	195	66	0	1 247	100%
Non-hazardous waste diverted from disposal through other recovery operations (tonnes)	251	0	0	0	0	0	251	100%
Non-hazardous waste diverted from disposal (tonnes)	676	560	55	195	66	0	1 552	100%
Total quantity of waste diverted from disposal (tonnes)	1 114	957,783	56,288	540,458	125,6	0	2 794	100%
Proportion of waste diverted from disposal (%)	23%	54%	11%	56%	48%	0%	34%	100%
Waste designated for disposal								
Hazardous waste designated for disposal – Incineration (tonnes)	16	0	0	0	0	8	24	100%
Hazardous waste designated for disposal – Landfill (tonnes)	92	61	32	28	0	0	212	100%
Hazardous waste designated for disposal – Other disposal operations (tonnes)	5	0	0	0	0	0	5	100%
Hazardous waste designated for disposal (tonnes)	114	61	32	28	0	8	242	100%
Non-hazardous waste designated for disposal – Incineration (tonnes)	489	0	0	0	15	3	507	100%
Non-hazardous waste designated for disposal – Landfill (tonnes)	1 113	560	226	400	120	0	2 418	100%
Non-hazardous waste designated for disposal – Other disposal operations (tonnes)	631	0	0	0	0	0	631	100%
Non-hazardous waste designated for disposal (tonnes)	2 233	560	226	400	134	3	3 556	100%
Total quantity of non-recycled waste	3 631	827	435	428	134	11	5 467	100%
Proportion of non-recycled waste (%)	77%	46%	89%	44%	52%	100%	66%	100%
Waste with an unknown end of life								
Hazardous waste with an unknown end of life	36	0	0	0	0	0	36	100%
Non-hazardous waste with an unknown end of life	1 249	206	178	0	0	0	1 633	100%



C. Policies and actions relating to the circular economy and responsible products

Les politiques

- ISO 14001 environmental certification policy
- QSE policy
- Commitment to drafting Environmental and Health Product Declarations in accordance with the ISO 14025 standard.
- Waste management: prevent, reduce, reuse, recycle, recover, dispose

See [Chemical substitution policy](#).

Actions

Environmental and Health Declaration Sheet

An Environmental and Health Declaration Sheet (FDES in French, EPD for the rest of Europe) is a type III environmental declaration within the meaning of ISO 14025. It contains the results of a product’s life-cycle assessment, as well as health information, particularly for calculating a building’s environmental and health performance as part of its eco-design.

The FDES must comply with the requirements of:

- the EN 15804 standard and its national supplement
- the decrees and orders in force concerning environmental declarations for construction and decoration products in France
- the rules of the INIES programme

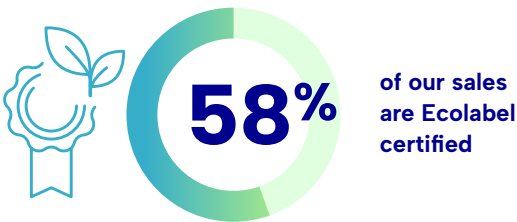
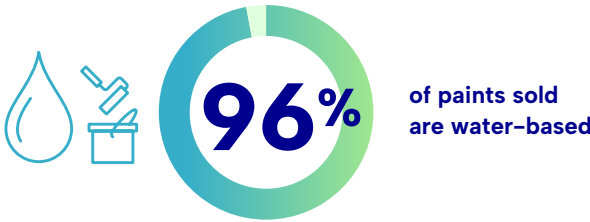
The FDES take into account the entire life cycle of the product, from the extraction of raw materials to its end of life, including transport, installation, and the use of the product itself.

They provide multi-criteria, objective, quantitative and qualitative information on the product’s function and service life within the building.

The main role of the FDES is to provide the necessary and helpful information to those who wish to add environmental and health performance criteria, based on unbiased data, to their usual decision-making criteria (technical, economic, and aesthetic).

They constitute an irreplaceable tool for assessing the environmental performance of buildings.

Cromology prepares its FDES using expert software that supports the collection of environmental and health data for each



product. Some data are directly related to the manufacturing stage, while others come from upstream (energy suppliers, raw materials, components...) and downstream (transport, installation...) stages.

The software processes all this data to calculate the product’s environmental indicators in accordance with the requirements of the various reference frameworks mentioned above.

Cromology makes the FDES for its products available through the INIES online portal.

Bio-based raw materials

Cromology develops paints that use bio-based binders instead of fossil-based binders, thereby reducing their carbon footprint.

For several years, Cromology has been developing formulations that use components with a reduced carbon footprint. This is particularly the case for paint ranges



based on resins incorporating bio-based residues from the agri-food industry, launched on the French market under the Tollens (Biome) and Zolpan (Bioalkyd) brands, and offered to partners in the DIY retail sector.

Use of recycled raw materials in products

The R&D department is conducting studies on the use of recycled fillers in paints. The company has notably launched a DIY-market product called Biorigin, made from renewable resin. This product is manufactured in a Cromology plant in France.

Water is a vital raw material in our production processes. The water treatment station at the Wormhout site in northern France recycled 3,312 tonnes of water in 2024 for use in paint production.

In parallel, Cromology is actively participating in projects led by the French paint manufacturers’ federation to develop paint recycling.

Use of recycled plastic

Cromology encourages the use of recycled plastic in packaging and the use of more

sustainable raw materials. All European sites use recycled plastics in primary packaging. As a result, 1,069 tonnes of plastic were recycled into packaging in 2024.

Product recovery

After quality control, products that are not in suitable condition for sale, for example, those damaged during transport, may be recovered at the local production unit.

Waste recovery and recycling

All Group subsidiaries comply with local waste management regulations. In France, a collection system for hazardous and non-hazardous waste from distribution networks has been implemented in collaboration with an external service provider specialising in waste treatment. Cromology encourages all employees, whether based at industrial facilities or offices, to sort waste.

All industrial sites and logistics platforms carry out selective sorting of the following waste streams:

- Paper
- Plastic
- Metals / Scrap metals

- Intermediate bulk containers of 1,000 L (washed for reuse)
- Wood, particularly from pallets
- General industrial waste

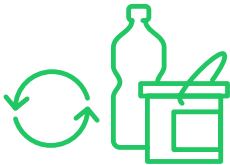
Management of waste generated by customers’ activities

In its leading countries, Cromology is a member of organisations whose missions are to encourage the sorting, collection, and treatment of chemical waste. These include EcoDDS and Valobat in France, ECOEMBES in Spain and CONAI in Italy.

In France, Cromology is a co-founder and member of the governance of EcoDDS (“Eco” stands for eco-organisation and “DDS” for Déchets Diffus Spécifiques – Specific Diffuse Waste in English), created in 2012 as part of the extended producer responsibility (EPR) scheme. Cromology contributes to the collective effort of industrial and retail companies by paying an eco-contribution for the collection and treatment of chemical waste.

EcoDDS works with waste treatment operators to incinerate or recycle waste under conditions that respect health and the environment. In partnership with EcoDDS, since

2019, Cromology has installed a free waste sorting system (for paints, mastics, strippers, and accessories). This system, called Rekupo, has been deployed in 271 Tollens and Zolpan points of sale (representing 90% of its outlets in mainland France). Since the launch of Rekupo in 2019, Cromology has collected 961 tonnes of waste generated by the construction sites of its professional and private customers.



1069

tonnes de plastique
ont été recyclées
dans les emballages
en 2024.



Improving the thermal performance of buildings through the marketing of External Thermal Insulation Composite System (ETICS)

Cromology offers a complete range of Exterior Thermal Insulation products to improve the thermal performance of buildings while preserving the aesthetic appeal of facades.

The sales teams in the European Union countries where Cromology operates are trained to recommend solutions to reduce heat loss from walls and facades in single-family homes, apartment blocks, and commercial buildings, in compliance

with local regulations (RE 2020 in France, for example).

The ETICS systems marketed by Cromology are certified under European Technical Approvals.

The Group also markets “Cool Roof” reflective coatings that help maintain the temperature of buildings in the tertiary sector by protecting them from the sun’s rays and heat.

Cromology designs paints that extend the life of homes, individual and collective property.

The resistance and lifespan of our applied paints are a priority for our Innovation and Product Development, and Marketing teams. They are committed to developing paints with the highest level of wet abrasion resistance, as defined by the eponymous standardised test. This is the case, for example, with Tollens Class 1 washable trim paint. Its formulation means that less paint can be applied than with conventional paint, extending the time before coatings need to be renewed.





2

Water, air and soil pollution

A. Description of impacts, risks and opportunities related to pollution

Cromology pays particular attention to pollution issues throughout the life cycle of its products, from manufacturing to use.

Industrial processes, paint composition and certain usage practices can cause air, water and soil pollution and affect living organisms, notably through the emission of substances of concern or microplastics. These impacts give rise to increasing regulatory, financial and reputational risks, in a context of increasingly stringent standards and heightened societal expectations.

Strict regulations such as REACH, directives on VOCs (Volatile Organic Compounds), hazardous waste or biocides exemplify these challenges and require continuous vigilance. They also represent a driver of innovation for Cromology, which develops solutions that are more respectful of health and the environment, such as substituting high-risk substances, reducing VOCs, and designing products that improve indoor air quality and promote responsible management of waste and wastewater.





Detailed description of the impacts, risks and opportunities related to pollution

(see [Appendix – Double Materiality Assessment Methodology](#))

			Upstream value chain	Operations	Downstream value chain	Time horizons
Air pollution	I _N (potential)	Emission of volatile organic compounds (VOCs) polluting the air during the paint production process and during use by customers.		X	X	MT
	I _N (real)	Development of solutions that promote indoor air purification.		X	X	CT
	I _P (real)	Regulatory risk linked to potential future bans on the use of certain chemical substances in paint manufacturing, with a possible risk of increased R&D costs and CAPEX to adapt formulations, as well as exceptional expenses in the event of non-compliance, compliance costs, exclusion from specific insurance coverage, difficulties in selling stock, and a potential decrease in revenue (loss of customers applying responsible purchasing policies).			X	CT
	R	Risk of litigation and financial penalties if substances contained in paints (polluting the air) create a public health issue, with a potential risk of increased exceptional expenses and a reduction in net profit in the event of sanctions.		X		CT – MT
	R	Market share gains through the development of water-based paints to replace organic solvents, with potential revenue growth.		X		MT – LT
	O	Optimisation of product transport to distribution points through the development of freeze-dried paints (taking up less space in lorries), with a potential reduction in operating expenses (OPEX).		X	X	MT – LT
	O	Leaks of chemical products into water during production and during rinsing of “contaminated” tools during use.		X		MT
	I _N (potential)	Pollution of groundwater by paint residues (from unused products or water used to clean brushes and tools), which may contaminate water if not properly disposed of. Certain heavy metals present in some paints (lead, cadmium, chromium) or toxic pigments may also seep into watercourses as they degrade and harm aquatic life.		X		CT – MT
	I _N (potential)	Pollution des eaux souterraines causée par les résidus de peinture (issus de produits non utilisés ou de l’eau utilisée pour nettoyer pinceaux et outils), pouvant contaminer l’eau s’ils ne sont pas éliminés correctement. Certains métaux lourds présents dans certaines peintures (plomb, cadmium, chrome) ou pigments toxiques peuvent également s’infiltrer dans les cours d’eau lors de leur décomposition et nuire à la vie aquatique.	X	X	X	MT
	R	Risque réglementaire lié à d’éventuelles interdictions futures de l’utilisation de certaines substances chimiques dans la fabrication des peintures (exemple : PFAS).		X		MT – LT
Water pollution	R	Risques réglementaires et de réputation liés à des déversements accidentels de produits chimiques dans l’eau pendant la production.		X		CT – MT



			Upstream value chain	Operations	Downstream value chain	Time horizons
Pollution des sols	I _N (potential)	Soil pollution affecting physical properties (acidification, alteration of structure, reduction in water retention capacity...) during the production process due to leaks of chemical products, as well as when rinsing "contaminated" tools during use.		X	X	MT – LT
	R	Risk of exceptional costs related to the remediation of contaminated sites (from Cromology's current or past activities).		X		MT – LT
Substances préoccupantes	I _N (potential)	Discharges of chemical substances into the air posing a danger to the environment and health.		X	X	CT – MT
	I _P (real)	Development of solutions to neutralise substances of concern (for example, formaldehyde).			X	CT
	R	Regulatory risk and R&D costs linked to future bans on the use of certain chemical substances in paint manufacturing.		X		CT – MT – LT
Substances extrêmement préoccupantes	I _N (potential)	Discharges of chemical substances into the air posing a danger to the environment and health.		X	X	CT – MT
	I _P (real)	Development of solutions to neutralise substances of concern (for example formaldehyde).			X	CT
	R	Regulatory risk and R&D costs linked to future bans on the use of certain chemical substances in paint manufacturing		X		CT – MT – LT
Microplastiques	I _N (potential)	Production of microplastics posing a danger to the environment and health.		X	X	CT – MT
	R	Regulatory risk and R&D costs linked to future bans on the use of certain polymers in paint manufacturing.		X		CT – MT – LT



B. Pollution-related data

Pollution-related data cover all Cromology production sites and logistics sites.

Pollution-related data	France	Italy	Portugal	Spain	Morocco	Switzerland	Group	Coverage rate
Total suspended solids (TSS) (tonnes)	0	0	0	0	7	0	8	100%
Chemical oxygen demand (COD) (tonnes)	7	1	7	2	0	0	18	100%
Average emissions of volatile organic compounds (VOCs) (tonnes/products sold)	1	0	12	12	6	0	5	100%



This year, the indicators already monitored and most relevant to Cromology’s activities are published in this report. The monitoring of data on air, water, and soil pollution, as well as substances of concern, as required by the CSRD, will need to be further completed.

Indeed, Cromology is already committed to a continuous improvement process to enhance the quality of its environmental data, providing complete, reliable and transparent information on the pollutants generated by its operations by 2027, the year in which the Group will be subject to sustainability reporting under the CSRD.



C. Policies and actions relating to pollution

Policies

- the Ethics Charter
- the three pillars of our CSR strategy, including the Planet pillar
- the triple ISO 9001 – 14001 – 45001 certification policy
- the QSE policy

Actions

All Cromology sites are triple-certified under ISO 9001, 14001 and 45001.

The Group’s QSE policy is available in the document management system and displayed at industrial sites. This QSE policy includes a commitment to meet legal requirements and those of all stakeholders (shareholders, customers, environmental agencies, etc.). These requirements include those relating to releases into water, air and soil.

Cromology organises its environmental regulatory monitoring to stay informed of regulatory developments and thereby continuously adapt its practices, plan regular investments at its sites, and implement appropriate training and awareness-raising for its personnel.



Key indicators – Training

Percentage of new hires trained in environmental golden rules	100%
Percentage of staff trained in ADR* regulations among eligible personnel across the various sites (74 individuals)	94%

*European Agreement related to the international carriage of dangerous goods: in the case of Cromology, this concerns the shipment of solvent-based paints or hazardous waste. A safety adviser issues an annual report.

The production sites are subject to specific requirements defined by prefectural orders, which set out the technical and operational provisions that must be observed. The relevant environmental parameters concern emissions into the air, water, and soil.

These orders also provide for an intervention plan to be deployed in the event of an incident.

The sites are furthermore subject to internal and external inspections and controls at predefined intervals and based on predetermined parameters, to ensure full compliance with industrial operating conditions

that guarantee the conformity of emissions into air, water, and soil.

Cromology conducts and updates hazard and impact studies for its industrial sites whenever significant changes occur. In addition, the sites reassess their environmental aspects and impacts each year as part of ISO 14001 certification.

Industrial sites monitor physico-chemical parameters at the frequency specified in their prefectural orders. These parameters form part of the operational management of the facilities, with alert thresholds that allow the detection and correction of any fluctuations. The results of these monitoring activities are communicated to local authorities through periodic reports and specific studies (solvent management plan, annual environmental assessment, annual declaration of pollutant emissions...).

In parallel, these results are included in a monthly reporting process, which is then consolidated into a group-level monitoring table and sent to the shareholder, DuluxGroup, at the beginning of each month.



Discharges into water

Sites are equipped with water treatment facilities before discharge, either into municipal networks or into the natural environment.

Rainwater networks are separated from industrial wastewater. These networks are fitted with hydrocarbon separators.

For example, the Wormhout site has been using an additional installation to treat wash water for reuse in paint production processes since 2023. This facility has a positive impact by reducing the quantities of wastewater discharged (see the Water Resources section).

Similar investments are planned at the major production sites.

Discharges into the air

Because 96% of paints sold are water-based, the impact of production on air quality is low. VOC levels remain a parameter monitored by industrial sites. Research and Development can further limit impacts by developing less hazardous products.

In addition, sites reduce the release of powders and dust that could enter the air. They are equipped with filtration systems to prevent dust emissions from powder transport systems. Transport and unloading lines are also fitted with dust extraction units.

Employees are trained to identify, intervene in, and report any loss of containment that could generate an environmental incident. This reporting is part of the indicators monitored and consolidated monthly at the Group level. Incidents are shared within the Group as part of experience feedback and a continuous improvement approach.

Soil pollution

Cromology does not monitor any soil pollution indicators, as these are not relevant to its sites. Indeed, the production sites do not carry out any activities involving the spreading or injection of waste into the ground. This is also consistent with local regulations and the sites' operating licences, which do not require any reporting on soil pollution.

Cromology is subject to monitoring of groundwater quality, and no threshold exceedance has been recorded. Furthermore, no spill incidents leading to soil releases or pollution occurred in 2024.

No major incident requiring operational expenditure occurred in 2024.





3

Water resources

A. Description of impacts, risks, and opportunities related to water and marine resources

Water is an essential resource for Cromology’s activities, used both as a key component in the formulation of its products and within its manufacturing processes.

This dependency entails significant responsibility for sustainable water management. Cromology is aware of the potential impacts of its activities on water availability in some water-stressed regions, as well as the risks associated with excessive abstraction, wastewater discharges, or accidental pollution.

These issues are all the more critical in the context of climate change and increasingly stringent regulation. However, they also create opportunities for innovation, notably through the development of products with lower water consumption, technologies that limit discharges, and the integration of bio-based raw materials derived from marine resources.





Detailed description of the impacts, risks and opportunities related to water resources

(see [Appendix – Double Materiality Assessment Methodology](#))

			Upstream value chain	Operations	Downstream value chain	Time horizons
Water consumption	I _N (real)	High water consumption, used as the basis for the company's products, may contribute to reduced water availability in surrounding areas.		X	X	LT
	R	Risk associated with the scarcity of water resources, particularly in the event of prefectural decrees in water-stressed areas, which may affect Cromology's operations.		X		MT – LT
	O	Development of new freeze-dried paint formulations that may increase revenue.		X	X	LT
Water abstraction	I _N (real)	Very significant water withdrawals, used as the basis for the company's products in a non-sustainable manner, reducing the availability of the resource for surrounding areas.		X	X	LT
	R	Risk associated with the scarcity of water resources, particularly in the event of prefectural decrees in water-stressed areas.		X		MT – LT
Water discharge	I _N (potential)	Leakages of chemical products into water during the production process.		X		CT – MT
	I _N (potential)	Pollution of groundwater by paint residues (from unused products or from water used to clean brushes and tools) may contaminate water if not disposed of properly. Certain heavy metals present in some paints (lead, cadmium, chromium) or toxic pigments may also infiltrate watercourses during their decomposition and harm aquatic life.	X	X	X	MT
	R	Regulatory and reputational risks associated with accidental discharges of chemical products into water.		X		CT – MT
Water discharged into the oceans	I _N (potential)	Leakages of chemical products into the oceans.		X		CT – MT
	I _N (potential)	Pollution of ocean water by paint residues (from unused products or from water used to clean brushes and tools) may contaminate water resources if not disposed of properly. Certain heavy metals present in some paints (lead, cadmium, chromium) or toxic pigments may also ultimately reach the oceans after their decomposition and harm marine life.	X	X	X	MT
	R	Regulatory and reputational risks associated with accidental discharges of chemical products into water.		X		CT – MT
Marine resources	I _P (potential)	Production of paint made from bio-based invasive species (oyster shells, algae).		X		LT



B. Water-related data

Water-related data cover all Cromology production sites and logistics sites.

In Switzerland, where Cromology only operates at points of sale, water consumption is limited to sanitary uses. This information has therefore not been collected, as it is considered non-material about the Group’s activities.

Water-related data	France	Italy	Portugal	Spain	Morocco	Switzerland	Group	Coverage rate
Total water consumption (m³)	32 498	41 920	13 319	18 213	3 292	NA	109 242	100%*
Total water consumption in water-stressed areas (m³)	10 004	0	13 319	0	2 764	NA	26 087	80%**
Total recycled and reused water (m³)	23 276	0	0	0	ND	NA	23 276	92%
Total stored water (m³)	0	25	480	0	400	NA	905	100%
Water withdrawals (m³)	15 378	41 317	4 259	0	0	NA	60 954	100%
Water discharge (m³)	3 337	8 133	9 352	6 209	265	NA	27 296	100%

* Coverage rate is 100% for sites where water is material.

** Water consumption data for water-stressed areas are unavailable for one French site.





C. Policies and actions related to water

Policies

- The ethics charter;
- The three pillars of our CSR strategy, including the Planet pillar;
- The triple certification policy ISO 9001-14001-45001.

The Group QHSE policy is available in the document management system and displayed at production sites. This QHSE policy includes a commitment to comply with legal requirements and the requirements of all stakeholders (shareholders, clients, environmental agencies, etc.).

This policy is implemented at production sites under the responsibility of site Directors. It integrates issues related to the optimisation of water consumption, particularly for sites exposed to water-stress risk (Wormhout and La Bridoire). Prefectural decrees set annual consumption limits.





D. Actions related to continuous improvement and consumption optimisation

Production sites conduct regular awareness sessions on proper water use. Water management procedures are implemented. Sites measure and control monthly or more frequent water consumption volumes.

Some sites organise daily rounds in the main workshops and buildings, using water to check for leaks visually.

This monitoring is consolidated at the Group level and reported to the shareholder, DuluxGroup, at the beginning of each month. Abnormal variations are investigated to ensure there are no leaks in the networks. Unusually high consumption is analysed to determine the underlying causes.

Example: unusually high cleaning requirements.

France

The Wormhout plant recycles its process water (white water) within its production processes. It treats its wastewater (black water) during paint manufacturing using a flocculation/nanofiltration system inspired by ink industry technology. In partnership with the French water Agency, this treat-

ment plant required an investment of approximately €800,000, subsidised by the Artois Picardie Water Agency to the amount of €200,000.

It enables the treatment of 12m³ per day of aqueous effluents, producing treated water of a quality equivalent to municipal water. In 2024, the site recycled 3,312 tonnes of water.

This technology is replicable in other plants. The objective is to progressively deploy this solution at the La Bridoire plant in 2026.

The Lagnieu plant also plans to reuse washing water from the production unit in the coming years and to increase the washing water pressure to achieve greater mechanical washing efficiency. The site already optimises its consumption by prioritising long production runs to limit the number of washes between products.

The Wormhout site aims to collect rainwater for reuse in paint production by 2025.

The site has already invested in a 30m³ storage tank for roof water, sufficient to cover 10 to 15 days of production annually. Three roof water collection points have been established, and the water will be pumped to the nanofiltration system for recycling within the production process.

Italy

The Porcari site has implemented modifications to its installations by adopting a closed-loop cooling system. The site has also established a high-pressure washing system for tanks and mixers to optimise water consumption.

Spain

Cromology aims to reduce absolute water consumption from the network by 25% by 2026.



4

Climate change

A. Description of impacts, risks and opportunities related to climate change

As an actor in the paint industry, Cromology recognises its responsibility for greenhouse gas emissions, as well as the potential consequences of climate change across its entire value chain, its customers, and its operational modes in the short, medium, and long term. Climate change represents a significant challenge for the Group as it directly and indirectly affects its business activities.

Since 2020, reducing greenhouse gas (GHG) emissions has been a structuring axis of the CSR roadmap, materialised

through tangible actions targeting the principal identified levers.

The assessment of risks, opportunities, and impacts related to climate change has been strengthened as part of the 2025 double materiality analysis.





Detailed description of the impacts, risks and opportunities related to climate change

(see [Appendix – Double Materiality Assessment Methodology](#))

			Upstream value chain	Operations	Downstream value chain	Time horizons
Climate change mitigation	I _N (real)	Carbon emissions linked to the company's activities, particularly related to raw materials, energy consumption in poorly insulated buildings, and transportation (upstream and downstream).	X	X	X	CT
		Loss of opportunities linked to employee and customer expectations regarding corporate social responsibility – potential risk of decreased revenue.		X	X	MT
	R	Cost of compliance with regulations limiting CO ₂ emissions, requiring Cromology to modify its manufacturing processes – potential risk of increased R&D costs and transition costs associated with manufacturing processes.		X		MT – LT
		Introduction of a carbon tax, increasing the total amount of taxes payable by Cromology – potential risk of higher fiscal charges impacting net profit.		X		LT
	I _P (real)	Development of solutions that protect buildings from heat-related deterioration.			X	CT
		New construction materials that no longer require painting – potential risk of decreased revenue.	X			MT – LT
Climate change adaptation	R	Strengthening of regulations concerning the impact of products and industrial processes on climate change – transition costs.	X	X		MT
		Risk associated with insufficient adaptation of product formulations to climate change: product deterioration due to increased temperatures and humidity – potential rise in R&D costs, and possible decrease in revenue if products are not adapted.		X	X	MT – LT
		Flooding and drought at supplier sites could disrupt the supply chain, posing a risk of decreased revenue and an impact on the balance sheet (inventory).	X			MT – LT
		Raw material shortages that could cause supply chain disruptions – potential risk of decreased revenue and impact on the balance sheet (inventory).	X			LT



		Upstream value chain	Operations	Downstream value chain	Time horizons
Energy	O	Market share gains through the development of new products resistant to heat and water – potential increase in revenue and capital expenditure (although potentially requiring new investments in machinery and R&D).			X MT – LT
		Reduction of transport costs through an increased share of local sourcing in supplier selection.			X MT
		Increase in sales of white paint (according to the IPCC, painting roofs and walls white is a simple and effective measure to adapt to climate change).			X MT – LT
	I _N (real)	Energy inefficiency of poorly insulated buildings and energy consumption for heating and air conditioning in retail outlets (impacting the availability of resources for future generations), exacerbating the effects of climate change.			X CT
		Increase in energy prices – higher energy expenditures.			X MT
	R	Pressure from consumers and society in favour of the energy transition: reputational risk in the event of non-adaptation – potential for decreased revenue due to image degradation.			X CT – MT
		Risk of increased energy demand linked to climate fluctuations: higher energy expenditures for air conditioning and heating – increase in energy costs (particularly in retail outlets).			X MT – LT
		Cost of compliance for buildings due to new regulations – renovation or relocation expenses.			X MT – LT





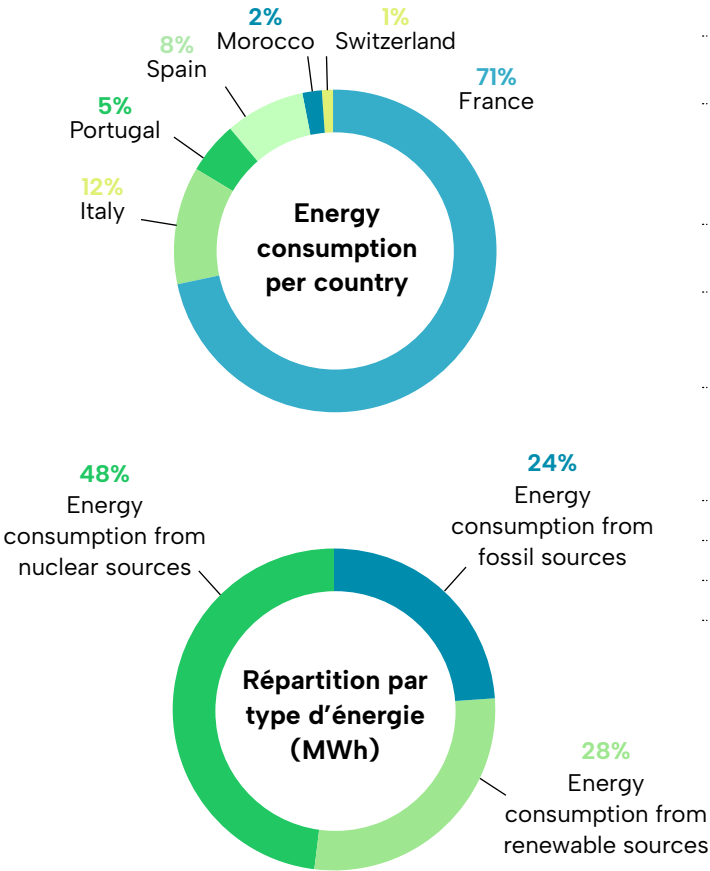
B. Data on climate change

Data on energy and greenhouse gas emissions (GHG) cover all production and logistics sites, as well as the commercial entities Tollens and Zolpan.

Some information has also been collected centrally, notably data on the vehicle fleet’s energy consumption and Scope 3 categories, which rely on transversal data (purchases, travel, transport, etc.) centralised within the support services. These centralised data cover the entire Cromology perimeter.

Data on energy consumption

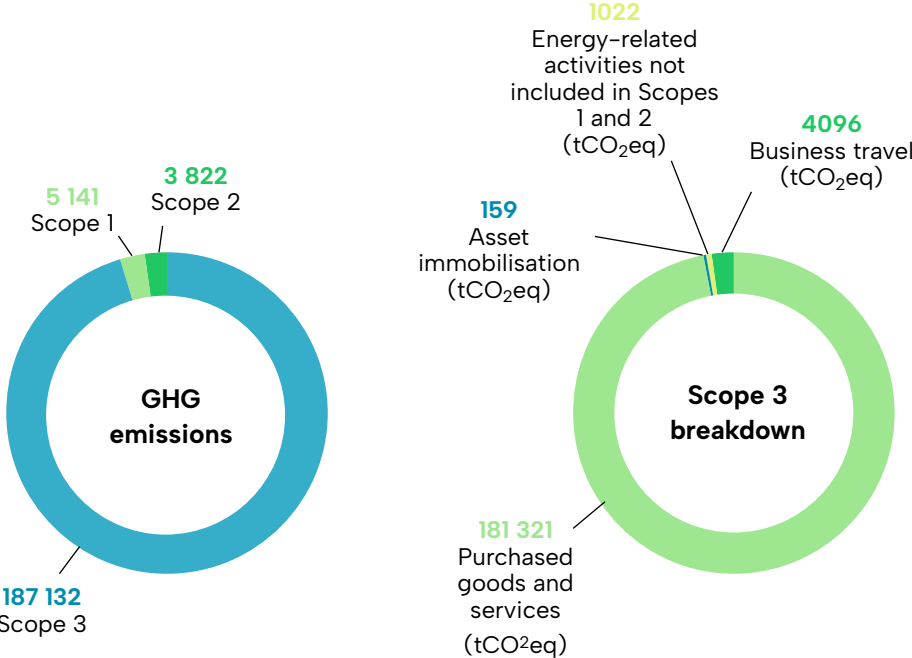
Energy consumption	France	Italy	Portugal	Spain	Morocco	Switzerland	Centralised data	Group	Coverage rate
Consumption of fuel derived from coal and coal by-products (MWh)	0	0	0	0	0	0	0	0	100%
Consumption of crude oil and petroleum products (MWh)	0	0	0	7	0	0	191	198	100%
Consumption of natural gas (MWh)	3 846	0	43	0	0	68	0	3 958	100%
Consumption of other fossil fuels (MWh)	0	0	0	0	0	0	0	0	100%
Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources (MWh)	3 145	0	1 504	0	774	0	0	5 423	100%
Energy consumption from fossil sources (MWh)	6 991	0	1 548	7	774	68	191	9 578	100%
Energy consumption from nuclear sources (MWh)	16 520	0	0	0	0	0	0	16 520	100%
Energy consumption from renewable sources, including biomass (MWh)	0	0	0	0	0	0	0	0	100%
Consumption of renewable electricity (MWh)	726	4 256	259	2 670	0	176	0	8 087	100%
Energy consumption from renewable sources (MWh)	726	4 256	259	2 670	0	176	0	8 087	100%



Total energy consumption (MWh)	24 237	4 256	1 807	2 676	774	244	191	34 185	100%
Share of fossil energy in total consumption (%)	29	0	86	0	100	28	0	28	100%
Share of nuclear energy in total consumption (%)	68	0	0	0	0	0	0	48	100%
Share of renewable energy in total consumption (%)	3	100	14	100	0	72	0	24	100%

Energy consumption from high climate impact activities	France	Italy	Portugal	Spain	Morocco	Switzerland	Centralised data	Group	
Energy consumption from high climate impact activities	24 237	4 256	1 807	2 676	774	244	191	34 185	100%
Energy intensity of activities in high climate impact sectors (total energy consumption per net turnover)								49,6	100%

Energy production	France	Italy	Portugal	Spain	Morocco	Switzerland	Centralised data	Group	
Production of renewable energy	0	0	0	0	0	0	0	0	100%
Production of non-renewable energy	ND	0	0	0	0	0	0	ND	92%
Total energy production	ND	0	0	0	0	0	0	ND	92%



The Group has decided to carry out a carbon footprint assessment in 2025, based on 2024 data, to refine its emissions calculation method, particularly for Scope 3 emissions. Some activity data are not yet available, including upstream and downstream transport as well as employee commuting (indicated as “ND” in the table). As a result, only a partial assessment is published in this report.

The differences in emissions observed compared with previous years are explained by changes in the methodology used. This methodology has been refined for the purchase of goods and services to better reflect the realities of Cromology’s activities. This change, which results in an apparent increase in emissions despite the absence of certain emission items, has nevertheless enabled refinement of the emission factors for its suppliers. The methodology used in 2024 will serve as the basis for subsequent years to confirm the baseline year and determine the carbon strategy.

Cromology has set a priority objective to establish a full carbon footprint assessment in 2026, incorporating all direct and indirect emission items. The company also plans to revise the 2021 baseline assessment to improve methodological accuracy and data quality. This approach aims to strengthen the reliability of the greenhouse gas emissions reduction strategy and to ensure a more robust monitoring of climate performance over time.



C. Policies and actions relating to climate change mitigation and adaptation

Policies

- 1 PolitiqPolicy of triple certification ISO 9001, ISO 14001 and ISO 45001
- 2 QSE policy mentioning CSR and the optimisation of resources
- 3 Carbon footprint policy: The Group has decided to conduct an annual carbon footprint assessment to refine its emissions calculation method, particularly for Scope 3 emissions.

Cromology has been monitoring energy consumption at industrial sites monthly for several years. These consumption data are consolidated and reported to DULUX each month.

The Group also conducts energy audits at the retail outlets with the largest floor areas to identify potential optimisation measures.

Initiatives to reduce Scope 1 and Scope 2 emissions

Cromology has pursued a policy of replacing neon lights and bulbs with LED lighting for several years, in line with its investment projects.

Cromology is modernising its mixers by installing frequency converters on motor drives to optimise electricity consumption.

The Group has decided to install solar panels at the Porcari site (Italy) and at the Lisbon site (Portugal). The projects are scheduled for 2025 and are expected to be operational in 2026. These projects consist of installing and operating solar canopies in vehicle car parks and solar panels on the roofs of the buildings.



CO₂ emission reduction forecast

Portugal: 435 Teq CO₂ per year
Italy: 140 Teq CO₂ per year
Teq: tonnes equivalent

Regarding retail outlets, an energy audit of the most energy-intensive stores was conducted in 2024. This audit produced a set of recommendations. These recommendations are taken into account and incorporated into a multi-year improvement programme. In 2025, the installation of software enabling real-time monitoring of gas and electricity consumption is planned, to address any deviations and to prioritise improvement actions such as:

- the modernisation of the air-conditioning and heating systems,
- the transition from gas to electricity.

In France, the property department is fully committed to these actions. It plans to modernise more than 60 retail outlets in 2025, with a budget of approximately €350,000.



Scope 3

Cromology’s suppliers

The data from the 2021 carbon footprint assessment were used to identify the Top 25 suppliers. The Group has launched an engagement initiative with 25 key suppliers, who together account for more than 70% of the emissions linked to the purchase of raw materials and packaging. This initiative aims to discuss, assess, and subsequently define and implement improvement plans with these strategic partners.

This approach is intended to confirm the Group’s carbon strategy, a prerequisite before it may be formalised in accordance with the method proposed by the Science Based Targets initiative (SBTi).

Transport providers

In France, the carbon performance of transport providers is monitored monthly. These partners help reduce Scope 3 emissions. One of the transport providers obtained the Objectif CO2 label in 2023, awarded for three years by the regional committee comprising representatives of the Ministry for Ecological Transition, ADEME, and professional organisations. This transport provider reduces its greenhouse gas emissions through four main levers that are currently being deployed:

- 1 The energy mix: increasing biofuel use.
- 2 The widespread adoption of Euro 6 vehicles through a constantly renewed fleet, the selection of performance-enhancing options (deflectors, assisted driving systems...), and retrofitting.
- 3 Driver performance through the rollout of an internal eco-driving training unit.

- 4 Transport optimisation: the development of cross-docking (traction + distribution), the deployment of double-deck trailers upstream, and scheduled deliveries downstream, enabling higher load rates and reduced empty kilometres.

Cromology intends to extend these improvement levers to all of its transport providers.

Adaptation of sites to climate change

Cromology has identified a climate-related risk: a reduction in water availability due to declining rainfall volumes. The Wormhout and La Bridoire sites will optimise their water consumption through two process-water treatment units designed to reintegrate treated water into finished products (see Water resources).





5 Biodiversity

A. A.Description of impacts, risks, and opportunities related to biodiversity

The consideration of biodiversity-related issues is gradually being integrated into Cromology’s environmental responsibility approach. Although these topics have not historically been at the heart of the company’s priorities, the 2025 double materiality assessment has enabled a better understanding of the interactions between its activities and ecosystems, as well as the risks associated with their degradation. Industrial processes, the substances used, and certain raw materials derived from extraction may affect the condition and extent of ecosystems, soil quality, and species health.

These findings encourage the Group to strengthen its actions and identify opportu-

nities, such as the use of bio-based materials derived from invasive species, which reduce both environmental impact and dependency on non-renewable resources. Cromology is therefore committed to progressively integrating biodiversity into its environmental strategy, as part of a continuous improvement approach.

The Group has not identified any risks under this ESRS and has not carried out specific consultations with affected communities during its double materiality assessment.

Aware that its activities, particularly those related to production, may potentially affect ecosystems, the Group has verified the environmental aspects and impacts of its sites within the framework of ISO 14001

certification. Cromology has not identified any significant effect of its operations on threatened species. However, as part of a voluntary approach, Cromology intends to assess the impact of its suppliers, particularly those providing raw materials, on biodiversity.





Detailed description of the impacts, risks and opportunities related to biodiversity

(see [Appendix – Double Materiality Assessment Methodology](#))

			Upstream value chain	Operations	Downstream value chain	Time horizons
Direct drivers of biodiversity loss – Climate change	I _N (real)	Cromology’s activities and value chain may contribute to climate change, leading to biodiversity loss.			X	LT
Direct drivers of biodiversity loss – Direct exploitation	O	New paint formulations derived from renewable sources (such as algae or oyster shells) reduce Cromology’s dependence on mineral extraction.		X		MT – LT
Direct drivers of biodiversity loss – Invasive alien species	O	Particular invasive algae species may be used in paint formulation.		X		MT – LT
Direct drivers of biodiversity loss – Pollution	I _N (potential)	Leaks of chemical products into water and soil may affect biodiversity, both during production and during customer use.		X	X	MT
	R	Environmental litigation risks may arise from the degradation of natural ecosystems (including pollution, chemical discharges and hazardous waste).		X	X	MT
Impacts on the conservation status of species – Species population size	I _P (potential)	The production of paint from bio-based invasive species (including algae and oyster shells) may help regulate their populations.	X	X		MT – LT
Impacts on the extent and condition of ecosystems – Land degradation	I _N (real)	Land degradation may result from the extraction of mineral deposits and petroleum-based raw materials within the value chain.	X			MT – LT
		Environmental litigation risks may arise if the surrounding soils are contaminated.		X	X	MT – LT



B. Policies and actions relating to biodiversity

- the ethics charter
- the three pillars of our CSR strategy, including the Planet pillar
- the policy of triple certification ISO 9001, 14001, 45001
- the partners’ code of conduct

At this stage, Cromology does not have a biodiversity transition plan, but it continuously ensures this issue is taken into account in its CSR strategy.

Levers in favour of biodiversity

The following actions carried out by the Group and its sites contribute to addressing the drivers of biodiversity loss:

- the various decarbonisation levers (see Policies and actions relating to climate change mitigation and adaptation)
- the control of emissions related to activities (see Policies and actions relating to pollution)
- the reduction of water withdrawals (see Policies and actions relating to water)
- the optimisation of resources and the management of waste (see Policies and actions relating to the circular economy and responsible products)

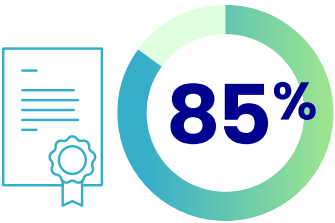
All environmental commitments and policies, and consequently those relating to biodiversity, are deployed across industrial sites under the responsibility of site Directors and adapted to local issues within the framework of the environmental management system.

Even though no risks have been identified regarding biodiversity associated with the direct impacts of its sites’ activities (industrial, logistics, or retail outlets), some good practices are implemented on the sites. The Lagnieu (ICP) site has carried out selective, cautious trimming of trees and shrubs for the past 10 years, after nesting or pollination periods. The site plans to plant ornamental trees using local species in 2028 and to incorporate pollinator-friendly green areas around the new buildings yet to be built.

Actions involving suppliers associated with responsible purchasing.

The Cromology purchasing department systematically sends the partners’ code of conduct to suppliers. The code of conduct clearly states that conducting business in an ethical, transparent, and socially and environmentally responsible manner enables long-term, sustainable development. Consequently, the code of conduct sets out Cromology’s commitments regarding environmental footprint.

Key performance indicator
Business ethics



Share of the purchase volume (raw materials, packaging, goods for resale) covered by suppliers that have signed the “Partners’ code of conduct”



Cromology is committed to minimising the environmental impact of its activities sustainably. Cromology aims to meet the applicable regulatory standards in all its entities and strives to exceed them. Consequently, Cromology expects its partners to mitigate, to the extent possible, the impact of their operations on the environment and, in any event, to comply with applicable laws and regulations. The adoption of global standards such as ISO 14001 is encouraged.

Furthermore, the life cycles of the products and services provided by suppliers must be incorporated into an approach that assesses risks to the ecosystem and biodiversity.

Partners are expected to implement plans to reduce waste to the extent possible. Hazardous waste must be treated separately and handled with care in accordance with the procedures in place. Waste recycling must be prioritised.

Partners are expected to control their water consumption across all their activities, to reduce it as much as possible, and to ensure that wastewater is not discharged into the natural environment. Finally, partners are

expected to implement plans to reduce energy consumption and greenhouse gas emissions as much as possible, including by using renewable energy sources.

In addition, the purchasing department applies the environmental management system procedures for supplier selection and evaluation, including environmental criteria. All these actions help prevent the environmental impact of Cromology’s suppliers.

Specific case of raw materials derived from mining and quarrying activities

Cromology recognises that the purchase of raw materials may indirectly generate impacts associated with mining and quarrying activities. Indeed, protecting natural habitats is a significant issue, just as crucial as decarbonisation. Cromology expects its suppliers to make firm commitments in this area.

Commitment from one of our titanium dioxide suppliers:

“We rely on the Earth’s resources to create essential products that people use every day, and it is our responsibility to protect

ecosystems and to restore them to their natural state.

For example, our assessment of the physical risks associated with climate change examined the increased risk of drought in certain mines and the need to reconsider the types of plants that we use for the revegetation of rehabilitated sites.”

Furthermore, some of Cromology’s suppliers commit to conducting a LEAP assessment, using software tools to review the indicators of the TNFD (Taskforce on Nature-related Financial Disclosures) and the global biodiversity framework. The TNFD has established a framework for this approach to guide organisations in disclosing and managing nature-related risks and opportunities. “LEAP” is an acronym for the four key phases of this approach: Locate, Evaluate, Assess, and Prepare. By applying this approach, companies can not only manage risks but also contribute to global efforts to halt biodiversity loss and to promote the sustainable use of natural resources. This tool covers the first three steps of the LEAP approach and can serve as a foundation for the preparation phase.

Rehabilitation of mines

Rehabilitation is an integral part of the life cycle of every mine and aims to protect, preserve, and restore local ecosystems. Rehabilitation measures are incorporated into environmental management plans, rehabilitation guidelines and procedures, and mine closure plans.

Commitments and practices:

- Implement proactive measures to protect animal and plant species, land, and water resources in the vicinity of sites.
- Consider nature-related impacts, opportunities, and dependencies when determining mining locations and extraction methods.
- Carry out studies as part of environmental management programmes (EMP) and environmental impact assessments.
- Comply with the EMP for each mining site, in accordance with local regulatory requirements and under the supervision of site and regional managers

appendix



Double materiality assessment methodology

Description of the methodology used to assess and evaluate the double materiality.

The double materiality assessment was conducted to identify and prioritise the environmental, social, and governance issues most significant to the company and its stakeholders, in line with the requirements of the CSRD Directive and the ESRS standards. The purpose of this approach is to inform the Group’s strategic priorities in terms of sustainability, taking into account both the impacts of its activities on society and the environment, and the financial risks and opportunities that may affect its performance. This appendix outlines the main steps, sources, and tools used throughout this exercise, as well as the criteria applied to assess and prioritise the issues.

The analysis of these issues brings together two perspectives:

- Impact materiality, which examines the actual and potential, positive or negative, effects of Cromology’s activities on society, individuals, and the environment.
- Financial materiality, which assesses the risks and opportunities related to these issues that may affect the company’s performance, development, or value in the short, medium, or long term.

All data were structured and visualised through a mapping exercise that cross-analysed these two dimensions.

Identification of specific impacts, risks, and opportunities

The identification of material impacts, risks, and opportunities for Cromology was based on:

- A review of existing internal documentation: CSR reports, policies, carbon footprint assessments, certifications...
- An analysis of sector-specific issues (derived from SASB standards and peer practices in sustainability reporting).

This initial step enabled Cromology to identify the impacts, risks, and opportunities that could be material. These impacts, risks, and opportunities could fall within or outside the scope of the ESRS standards. When the ESRS did not cover them, they were classified as specific issues.

Stakeholder consultations (interviews)

As part of the analysis of current and potential impacts linked to Cromology’s activities, as well as the perceptions of the stakeholders concerned, twelve interviews were conducted with internal actors from various functions (R&D, production, HSE, HR, purchasing, legal, finance, etc.), representing several countries and industrial sites.

The responses gathered during these discussions were analysed to validate and supplement the impacts, risks, and opportunities identified during the preliminary analysis. These impacts, risks, and opportunities were then prioritised according to their materiality.

Scoring criteria for impacts, risks, and opportunities

Each impact, risk, and opportunity was assessed in a scoring tool according to two dimensions:

Impact materiality

The following criteria were systematically assessed (from 0 to 5):

- Severity: the magnitude of the negative or positive impact on society and the environment.
- Scale: the extent of the impact in terms of the number of people affected or the relevant area.
- Irremediable character (applicable only to negative impacts): the capacity to return to the initial state.
- Likelihood of occurrence: the probability that an impact may occur based on the current situation.

By multiplying each criterion, the impact materiality score was obtained (severity*scale* irremediable character*likelihood).

Financial materiality

The following criteria were systematically assessed (from 0 to 5):

- Magnitude: the significance of the financial effects associated with a risk or opportunity on the company’s value (revenue, CAPEX...).
- Likelihood of occurrence: the probability that the risk or opportunity may occur, based on the company’s current situation.

By multiplying these two criteria, the financial materiality score was obtained (magnitude*likelihood).

The thresholds used to assess magnitude were aligned with those already applied within Cromology in the context of financial risk analyses.

The analysis also focused on the value chain (identifying where impact, risk, or opportunity arises within it) and the time horizon (identifying short-, medium-, and long-term horizons associated with each issue).

Validation Process

The entire double materiality analysis process underwent validation phases to ensure the robustness of the exercise and its alignment with Cromology’s context.

- Presentation to the CSR Committee: Cority presented the progress of the double materiality assessment during

several CSR Committee meetings. These presentations covered, in particular:

- the methodology applied and the pre-qualification of impacts, risks, and opportunities
- the initial results of the double materiality assessment

- Final validation by the Executive Committee: the consolidated matrix and the list of material impacts, risks, and opportunities were subsequently presented to the Executive Committee. This step enabled:

- the endorsement by the governing bodies of the conclusions of the analysis
- the integration of double materiality into the company’s strategy

- Results of the scoring of impacts, risks, and opportunities

For each sustainability sub-topic, a level of materiality ranging from “negligible” to “very significant” was obtained for positive and negative impacts, risks, and opportunities. Issues for which the final level of materiality was equal to or greater than “moderate” were deemed material for Cromology.

2 Methodology for data collection and processing

In 2025, Cromology deployed a software solution dedicated to sustainability reporting, Reporting 21.

This tool enabled automated data consolidation across sites and entities, thereby enhancing traceability and reliability. The tool was configured between April and June 2025 to integrate all indicators required by the regulation and to structure the data validation process by identifying contributors and validators within each entity and within the CSR team.

From June to September, contributors entered the information assigned to them in the platform. Consistency and reliability checks were then carried out jointly by the Cority and Cromology teams. When necessary, the data were reviewed with the contributors and subsequently updated in the tool.

The validated data were then consolidated at country level and subsequently at the Group level. Depending on the quality and availability of the information collected, the

consolidation is presented in this report either by country or globally at the Group level.

When an entity did not report a given data point, it is indicated as “Not available” (“ND” in this report).

When a data point was not collected at the entity level because it was not applicable, it is indicated as “Not applicable” (“NA” in this report).

Depending on the data available, several consolidation methods may have been applied:

- Sum of the data for all entities providing the information
- Average of the data for all entities providing the information

- Average of percentages: when ratio data were collected directly (and not calculated by Reporting 21)
- Aggregated ratio: when the underlying data enabling the calculation of the ratio were collected
- Workforce-weighted average for all entities providing the data and for which the workforce is known (applied exclusively to social data)

3 Reporting scope

All Group entities were consulted during the data collection process. The data were collected at different levels depending on the topics and the availability of information.

- **Spain, Morocco and Switzerland:** The data for these countries are collected on a consolidated basis at country level, without distinguishing between sites or local entities.
- **Cross-functional data:** Information relating to Scope 3 and the vehicle fleet is collected directly at the Group level, as it relies on cross-functional data (procurement, business travel, transport, etc.) that is centralised within support functions. Similarly, strategic environmental information (governance, transition plan, etc.) is centralised at the Group level.
- **Social data:** Quantitative data (headcount, training, etc.) are collected at the level of each entity employing staff. No quantitative social data are collected directly at the Group level. However, qualitative data (policies, HR processes, etc.) are centralised at the Group level.
- **Governance data:** Governance data are collected on a consolidated basis at the country and Group levels.
- **Environmental data:** In general, policies, actions, targets, and quantitative data (consumption, production, etc.) have been collected at the industrial and logistics site level. Data on Scope 1 and Scope 2 GHG emissions (energy consumption) have been collected at industrial sites, logistics sites, points of sale, and headquarters for consolidation at the Group level.

The reporting scope and the level at which data are collected are detailed, for each topic, in the corresponding sections of the report.

4

Definition of indicators

A. Social

	Key performance indicators	Definitions
	Turnover rate for permanent employees	Calculated using the following formula: $100 \times \frac{\text{“Number of departures among permanent employees during the period”}}{\text{“Total number of employees at the end of the period”}}$.
	Number of non-employees	Non-employees are either individuals who have concluded a contract with the company to provide their work (“self-employed workers”) or workers supplied by a company primarily engaged in “employment-related activities” (NACE code N78, for example, temporary workers).
Social dialogue	Share of employees covered by collective agreements	<p>Numerical data entered by contributors.</p> <p>Collective bargaining agreements include all negotiations that take place between an employer, a group of employers or one or more employers’ organisations, on the one hand, and one or more trade union organisations or, failing that, duly elected worker representatives mandated in accordance with national laws and regulations, on the other hand, aiming to:</p> <ul style="list-style-type: none">– determine working conditions and terms of employment and/or– regulate relations between employers and workers and/or– regulate relations between employers or their organisations and one or more workers’ organisations
Diversity	Employees with disabilities	Employees benefiting from recognised disability status (through official recognition by the social security system).
Health and safety	Share of employees covered by a health and safety management system (%)	Number of employees covered by an occupational health and safety management system that meets legal criteria and/or recognised standards (for example, ISO 45001) and that has been audited (internally or externally), expressed as a proportion of all employees.
	Frequency rate of accidents at work	Calculated using the following formula: $1,000,000 \times \frac{\text{“Number of work-related accidents”}}{\text{“Total theoretical annual hours worked”}}$
	Severity rate of accidents at work	Calculated using the following formula: $1,000,000 \times \frac{\text{“Number of days of absence resulting from a work-related accident”}}{\text{“Total theoretical annual hours worked”}}$
Work-life balance	Share of eligible employees who have taken a family-related leave (%)	<p>Calculated using the following formula: $\frac{\text{“Number of employees who took family-related leave”}}{\text{“Number of employees eligible for family-related leave.”}}$</p> <p>Family-related leave refers to specific types of paid or unpaid leave that employees may take to assume family responsibilities or respond to family-related events. Such leave is generally intended to support employees in balancing their professional and family obligations.</p>

B. Gouvernance

Key performance indicators	Definitions
Number of confirmed cases of corruption and bribery	Confirmed cases of corruption or bribery. Confirmed cases of corruption or bribery do not include cases for which an investigation is still ongoing at the end of the reporting period.

C. Environnement

	Key performance indicators	Definitions
Outgoing resources	Total quantity of waste generated (tonnes)	Quantity of hazardous waste (waste displaying one or more of the dangerous properties listed in Appendix III of Directive 2008/98/EC of the European Parliament and of the Council on waste) and non-hazardous waste generated during the year.
	Total quantity of waste diverted from disposal (tonnes)	Quantity of waste that is recycled, reused or recovered through other operations listed in Appendix II of Directive 2008/98/EC (waste framework directive).
	Total quantity of non-recycled waste	Quantity of waste that is incinerated, landfilled or disposed of through other operations listed in Appendix I of Directive 2008/98/EC (waste framework directive).
Pollution-related data	Total suspended solids (TSS) (tonnes)	Quantity of undissolved solid particles measured in a water sample after filtration.
	Chemical oxygen demand (COD) (tonnes)	Amount of oxygen required to chemically oxidise all oxidisable organic and inorganic substances present in a water sample.
	Average emissions of volatile organic compounds (VOCs) (tonnes/products sold)	Average quantity of organic chemical substances containing carbon (excluding CO ₂ , CO, CH ₄ and some other gases) emitted into the air per product sold.
Water-related data	Total water consumption in water-stressed areas (m ³)	Total volume of water abstracted or used in geographical areas identified as subject to water stress, that is to say, areas where water demand exceeds or is likely to exceed available resources (as identified in international indices).

Energy	Energy consumption	Total des consommations d'énergie issues de sources fossiles, renouvelables et nucléaires.
	Energy consumption from fossil sources (MWh)	Total des consommations de gaz naturel et de chaleur ainsi que de propane, diesel, essence, charbon, fioul domestique, et électricité provenant de sources fossiles
	Energy consumption from renewable sources (MWh)	Total des consommations d'électricité et d'essence provenant de sources renouvelables ainsi que de biopropane et biodiesel.
	Energy consumption from high climate impact activities	<p>"Sectors with a high climate impact" are considered to be those listed in sections A to H and section L of appendix I of Regulation (EC) n°1893/2006 of the European Parliament and of the Council:</p> <ul style="list-style-type: none">– Section A. Agriculture, forestry, and fishing– Section B. Mining and quarrying– Section C. Manufacturing– Section D. Electricity, gas, steam, and air conditioning supply– Section E. Water supply: sewerage, waste management, and remediation activities– Section F. Construction– Section G. Wholesale and retail trade: repair of motor vehicles and motorcycles– Section H. Transportation and storage– Section L. Real estate activities <p>Cromology's activities are considered to fall under the "Manufacturing Industry" sector.</p>
GHG Emissions	Gross Scope 1 GHG emissions (tCO2eq)	Direct emissions related to energy consumption (natural gas, fuels).
	Gross Scope 2 GHG emissions, location-based (tCO2eq)	<p>Indirect emissions related to energy consumption (electricity, district heating and cooling networks).</p> <p>Emissions associated with electricity consumption are calculated using a geographic-specific emission factor.</p>
	Gross Scope 2 GHG emissions, market-based (tCO2eq)	<p>Indirect emissions related to energy consumption (electricity, district heating and cooling networks).</p> <p>Emissions associated with electricity consumption are calculated using an emission factor linked to the energy supplier in accordance with the contracted agreement.</p>
	Gross Scope 3 GHG emissions (tCO2eq)	<p>Indirect emissions related to the purchase of products and services, asset immobilisation, waste generated, and business travel.</p> <p>Excluded from the 2025 carbon footprint are the following: upstream transportation of goods, employee commuting, downstream transportation of goods, leased assets, and end-of-life treatment of sold products.</p>

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