

2021

# ATLINKS

CORPORATE SOCIAL  
RESPONSIBILITY

ANNUAL REPORT



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# 1 MANAGEMENT COMMITMENT

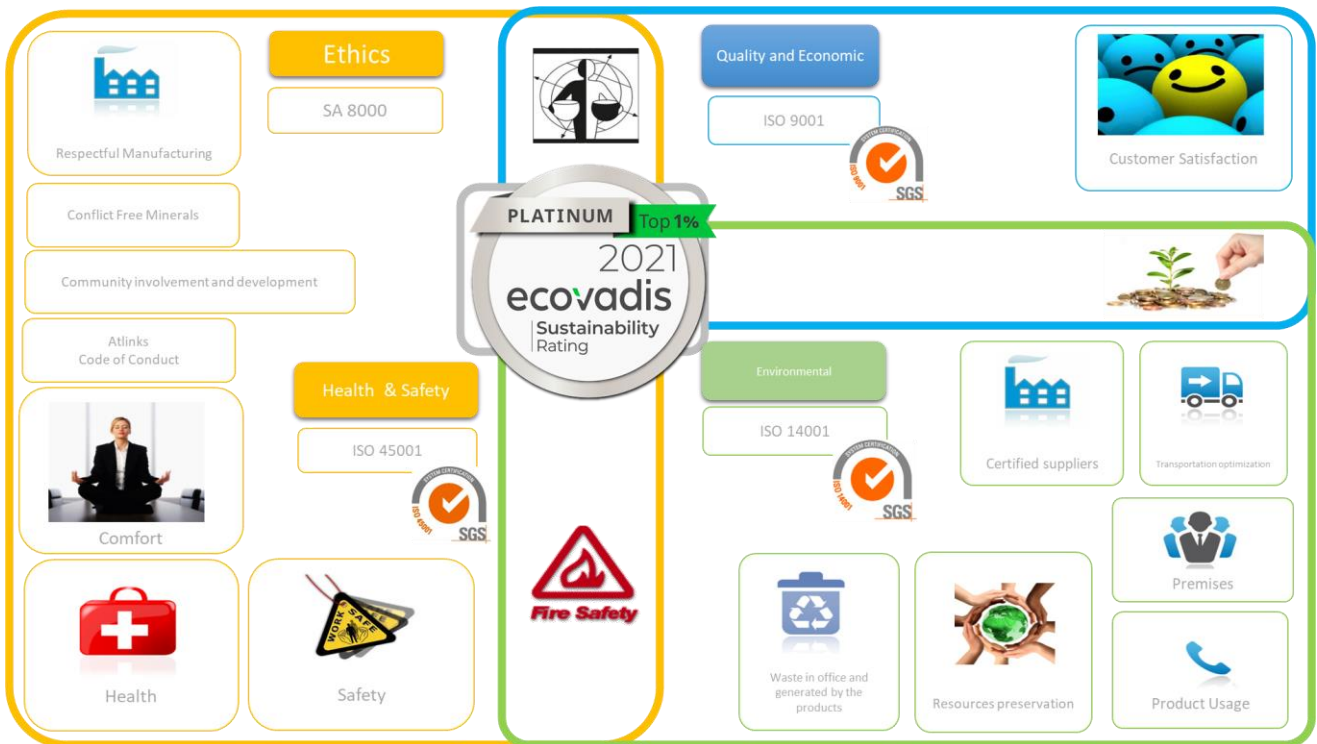
ATLINKS delivers excellence in its products, services and solutions that ensure customer value and contribute to their success. We strive to be recognized by our employees, customers, community, and shareholders as a responsible organization that conducts our business in a manner that conserves the environment, minimizes pollution, protect its employees from hazards by minimizing the risks.



Our commitment to quality, environment, health, safety and sustainable supply chain is reflected through programs focused on continual improvement and compliance with applicable regulations, industry standards and best practices, contractual requirements and corporate initiatives. Planned, integrated and consistent efforts involving every element of our organization created these results.

To warranty this approach, ATLINKS has an integrated Management Systems, which is certified conforming to the international Standards for: Quality, ISO 9001; Environment, ISO 14001 and Organizational Health and Safety, ISO 45001. We also support the 10 Principles of the United Nations Global Compact to enforce our commitment to all the stakeholders in our business, and we establish goals and targets in line with the Sustainable Development Goals defined by the United Nations.

C.H. Tong  
CEO



## 2 COMPANY PRESENTATION

ATLINKS designs, develops, markets, and sells fixed-line telephones, mobile phones, video, multimedia terminals, and other communication products dedicated to the elderly. ATLINKS customers are telecom operators and professional and consumer retailers all around the world.

It is a fab-less company, so it has a set of key manufacturers for products (also called, suppliers or vendors), which are long time partners for ATLINKS.

ATLINKS distributes worldwide the product range under three main channels: Consumer, Telco and Professional, and uses importers in some countries to export the goods to those countries.

ATLINKS commercializes products under its brands: Alcatel, Swissvoice, Amplicomms, and ATLINKS. It also uses the Telco and distributors brands. It acts as distributor for products under other brands.

From a joint venture



January 2010



Independent company

2017 and 2019

Acquired

SWISSVOICE



Worldwide presence

Hong Kong  
France  
Spain  
Mexico

Brand present in 60 countries



Telecom operators, business  
wholesalers, retailers

PSTN &  
IP office phones



Home phones &  
Monitoring solutions



Elderly range



### 3 COMPANY STRUCTURE

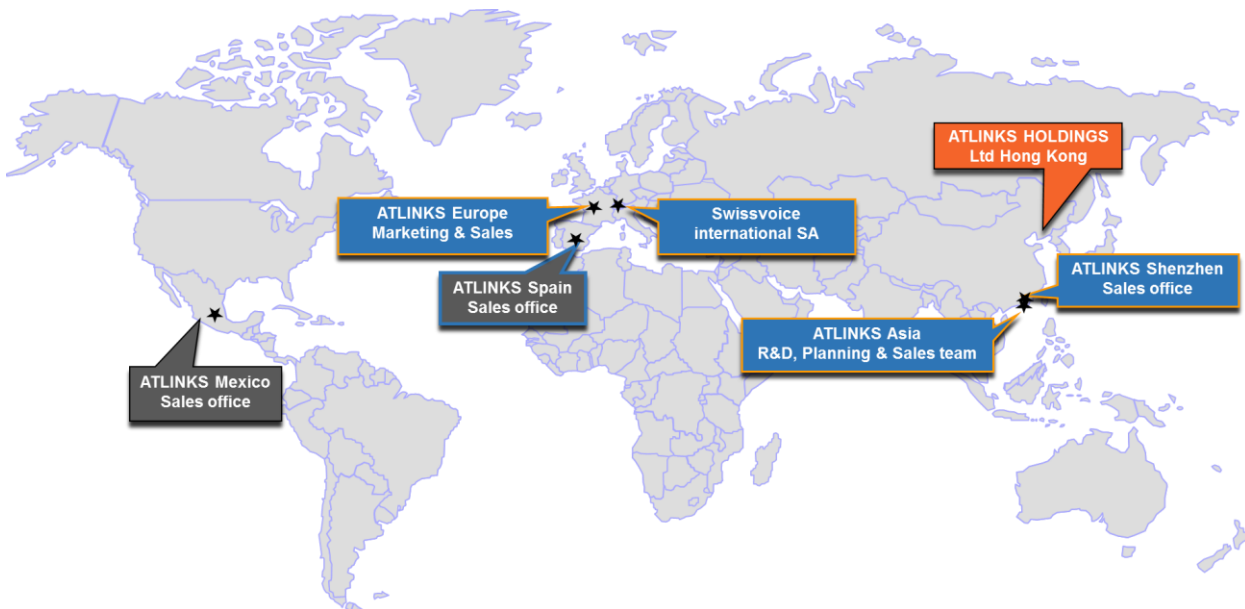
ATLINKS Holdings Ltd is a Hong Kong based company, with three subsidiaries, ATLINKS Asia Ltd, based in Hong Kong, ATLINKS Europe SAS, based in France and Swissvoice International S.A., based in Switzerland. There are three representative offices, one in Mexico which manages the commercial activity for Latam, another in Madrid which manages the Iberia market and in Shenzhen for the China market. Other markets are addressed thru distributors, importers and/or agents.

ATLINKS GROUP Ltd, the company who owns Atlinks Holdings Ltd, is a Hong Kong listed company. All financial information is publicly available at the investors section of the corporate web site: [www.atlinks.com](http://www.atlinks.com).

The staff of the company repartition is as follows:

ATLINKS Asia Ltd:	24 employees
ATLINKS Europe:	18 employees
Swissvoice International:	0 employees
Spain Sales office:	4 employees
Mexico Sales office:	0 employee
Shenzhen Sales office:	0 employees

There are also several consultants that assure some functions as identified in the [Organization manual](#).



## 4 ORGANIZATION

The operations of ATLINKS are developed by different companies for different functions, and it works as a sole company. The long experience of its employees and the little turn over makes a solid community.

Most of the product related functions are in Hong Kong, close to the product suppliers and manufacturing sites. The Europe operation is more oriented to the customers, marketing, and communications. Together with Europe the other sites are dedicated to sales.

### 4.1 RISK MANAGEMENT AND INTERESTED PARTIES

ATLINKS has identified and classified the different risks related to:

- Business activity
- Suppliers/Vendors
- Environment issues
- Health and Safety issues
- Anti-corruption and bribery

ATLINKS has identified its stakeholders and has listed their needs and requirements as a mechanism to make sure those are satisfied, qualify the impact of those requirements in the different aspects of our Management System (quality, environment and health and safety), and list the methods to mitigate the risks.

The **Business activity** risks are identified in the mappings of each process, and they are followed by the different indicators on the business activity. The risk assessment is done based defined levels of gravity and frequency of the main issues. A list of the company challenges is reviewed in a yearly basis, and the main risks are listed as well as the actions to cope with them. On the operational side, each process makes a SWOT analysis in a year basis.

The **Suppliers/Vendors** risk assessment is done every year together with their performance evaluation and audits results of the year, using the SWOT tool, before the Management Review to define the next year audit strategy. Audits are conducted every year.

For **Environment**, the risks are evaluated thru the Environmental Analysis, with the aspects and impacts matrix.

For the **Health and Safety**, the risks are also evaluated on a classical Risks assessment, based on main risks identified by the company together with the workers, and the means of control to mitigate the risks.

The **Anti-bribery** assessment is done based on a Risk matrix where we identify the issues that might happened and its consequences, for sensitive countries whenever needed.

## 4.2 ANTI-CORRUPTION



ATLINKS has issued a CODE OF CONDUCT, applicable to all employees and consultants working on behalf of ATLINKS.

This CODE OF CONDUCT reflects the Policy of the company to avoid any corruption, bribery or extortion, and respect of the rules and regulations related to these aspects.

Every employee has the responsibility to ask questions, seek guidance, and report suspected violations of this CODE OF CONDUCT, to the local or global Management, employee's representatives, or the Management representative.

ATLINKS has maintained an excellent check and balance system over transactions. Our books and accounts are subjected to statutory external financial audit annually in both subsidiaries. These audits are used as one of the methods of identifying any suspicious payments which could be related to bribery or corrupt behavior. This information is checked and controlled by finance, administration and HR department and the CEO.

Internal Audits are also used as the tool to detect any kind of deviation in this subject, and to identify any potential decision not made by any employee in an objective way, in the field of sourcing, purchasing or service request.

We have edited a *Code of Conduct HANDBOOK* with tools to help understanding of corruption and bribery, and to evaluate the risks by areas and countries where we operate.

A training plan has been completed end of 2015 and beginning of 2016 to cover the management, purchasing involved people, sales staff, and sales agents.

At the end of 2016, an extended training has been deployed to all employees and consultants. This training is based on the United Nations "The Fight Against Corruption", and it is given in the mother language of the trainee. This training is proposed to all employee that join the company.

The UN Convention against Corruption is also available in our documentation systems for easy access in the 3 main languages of the company: English, French and Spanish.

ATLINKS has also put in place a [whistle blowing procedure](#) to received input form the stakeholders publicly available at its corporate website [www.atlinks.com](http://www.atlinks.com)

### Result:

- 0 reports on corruption among the employees or any other stakeholder
- Training spread worldwide to staff and consultants, 65 % of people is trained with Certificate of training by the UN Fight anticorruption.
- Yearly refresh during the Sustainability Awareness training.

## 4.3 SUSTAINABLE DEVELOPMENT: THE GLOBAL COMPACT



ATLINKS supports the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labor, Environment and Anti-Corruption. We commit to disclose our results with a yearly Communication on Progress (this document).



## 4.4 SUSTAINABLE DEVELOPMENT GOALS

ATLINKS objectives are in line with the Sustainable Development Goals (SDG). At our company level, our actions reported in this document are labeled with the logos of each goal we pursue. We cover a large scope of goals (10) as we can summarize in the Annex section including the targets and review withing the year reported.

### SUSTAINABLE DEVELOPMENT GOALS



# 5 ENVIRONMENT

## 5.1 ENVIRONMENTAL MANAGEMENT

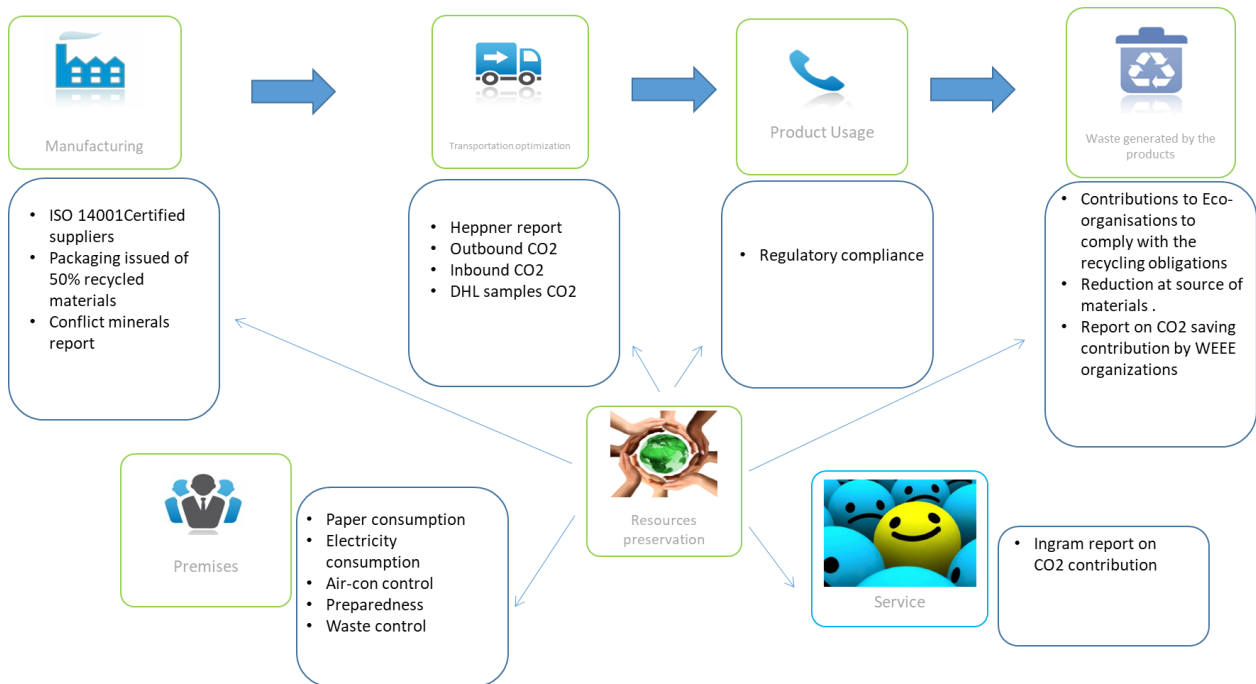
ATLINKS is a fab-less company, but very aware of the impact done in the environment. Framed with a Worldwide Environmental Management system, we focus our programs where we do have more impact: eco-design (recycling, product usage, and resources preservation), transportation, waste, and end-of-life of the products.

We also work in the environmental impact that our premises can have resources preservation (paper, electricity consumption) and waste management.

All those actions are driven within the respect of all applicable laws and regulations.

The Environmental Management system is certified under the international standard ISO 14001:2015 (Certificate in Annex section).

We calculate the year **global emissions** covering the most representative aspects using the method Bilan Carbone®, and adding the information provided by our stakeholders. We cover as much as possible Scope 1, 2 and 3. See Annex section.



## 5.2 ECO-DESIGN



The eco-design has a global impact in the environment, first using less raw materials, secondly, producing less waste, and third, positive impact on transportation, as we can transport more quantities using the same means. Overall, the carbon footprint of putting the product on the market is reduced. We practice the eco-design at several levels:

### 5.2.1 PACKAGING OF THE PRODUCT

#### Quantity of material used

Reduction of the packaging and user's guide, size and weight for resources preservation and transportation optimization. See chart below, **AWCSU: Average Weight of Consumer Sales Unit**.

- Corded has changed the size by **-0,5 %**
- DECT has changed the size by **-4,5 %**

### Mono-material

Our packaging is just done of cardboard material. Only small, separated plastic bags are inside the packaging to protect the accessories in some cases.

### Origin of the material-Recycled material

All the cardboard used in our product is composed of **recycled material** at:

- **81%** in average in 2021 (improved by **23%** vs 2020)

### Ink origin

We have banned the mineral oil inks of our packaging by mineral oil free inks which facilitates the recycling of the packaging.

- The nature of the inks used to print our packaging are **100 %** on mineral oil free inks.

### User awareness

We follow the recommendations from the organizations to help the users in the recycling. The below logo is printed in the boxes, to indicate the good bin where different elements of the packaging for better collection and recycling. We also inform the users of this sorting guidelines in our brand websites.

- France:



- Spain:



## 5.2.2 PRODUCT

### Material reduction

Reduction of the products weight (less material used) over the years, see chart below on Average WEEE per product.

- Slightly decrease (-0,82%) even if sold bigger product dedicated to the elderly.

### Recycled plastic

The resin plastic raw material used to manufacture our products has origin of recycled plastic at:

- **89%** in average in 2021 (improved by **71%** vs 2020)

### Product consumption

Since 2007 we implemented the EuP regulation to reduce the product consumption in its life in used and idle state (all products compliancy).

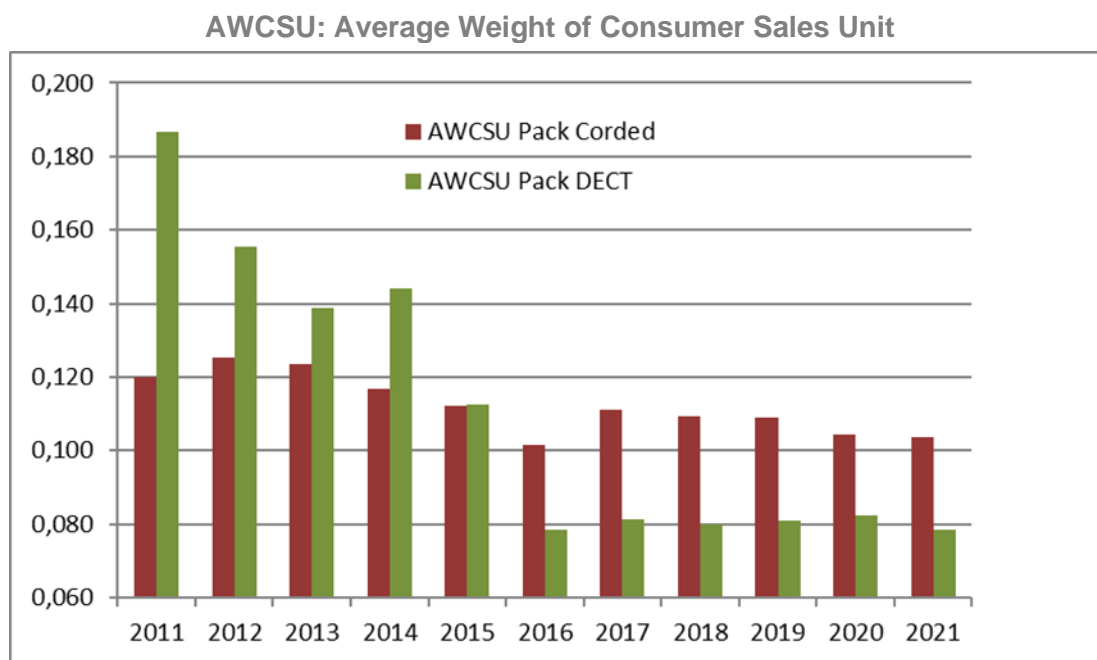
### Chemicals management

See chapter 5.6 specifically dedicated to this subject.

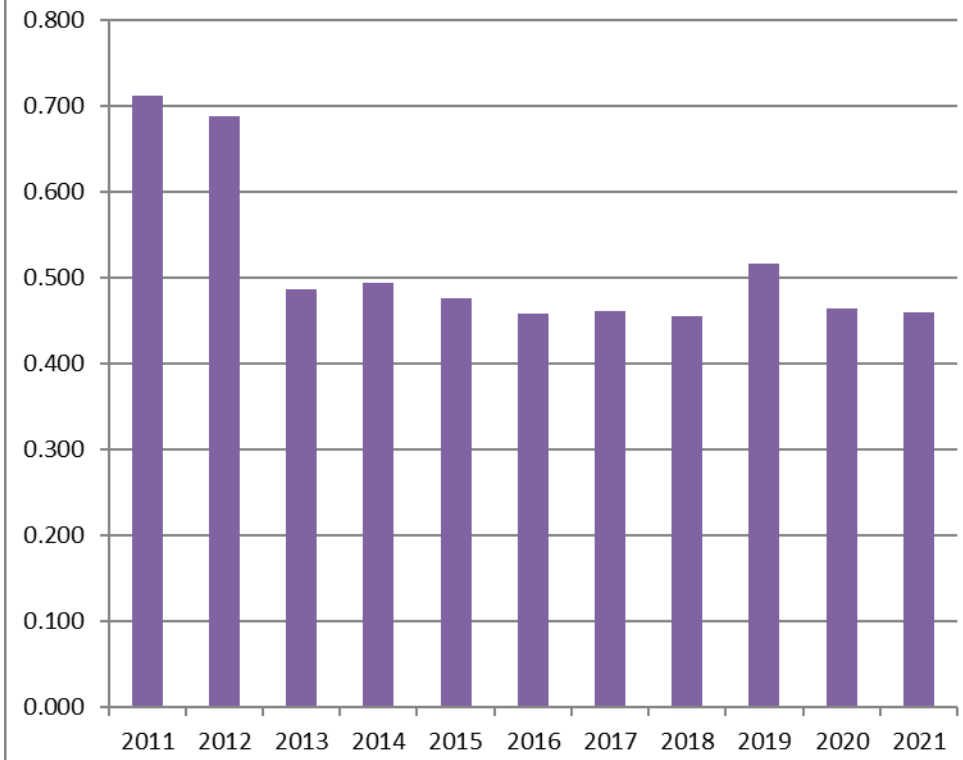
### Origin of metals used

See chapter 8.7 dedicated to Conflict Minerals.

### Results:



## Average WEEE Kg per unit



## 5.3 ENERGY



The most significant energy consumed in our premises is due to the Information system infrastructure and its air conditioning, and heat/aircon means. We could see that the impact of the distance working with the pandemic was little, since the IT infrastructure should be always running to insure our operations.

IT infrastructure, such the Data Center (Scaleway), has a running Energy Management System, which has been Certified ISO 50001.

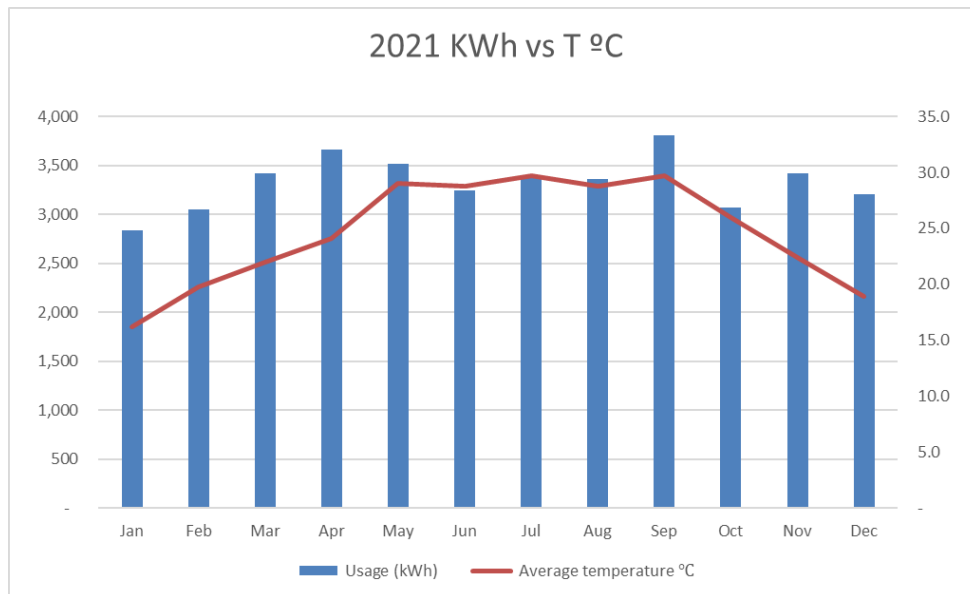
Employees are aware of simple saving reflexes.

Any time we need to replace a light, we do by LED ones. Corridor in France premises fully LED.

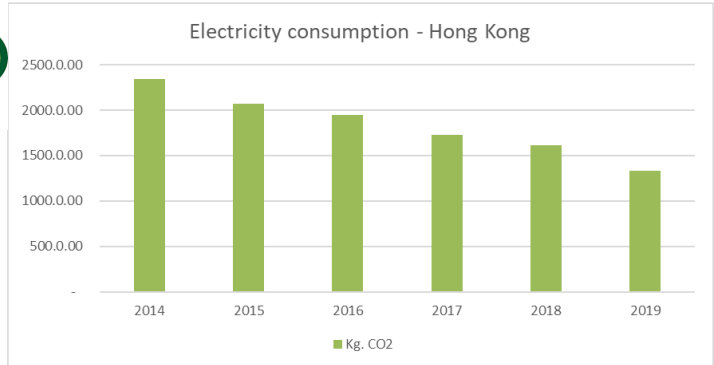
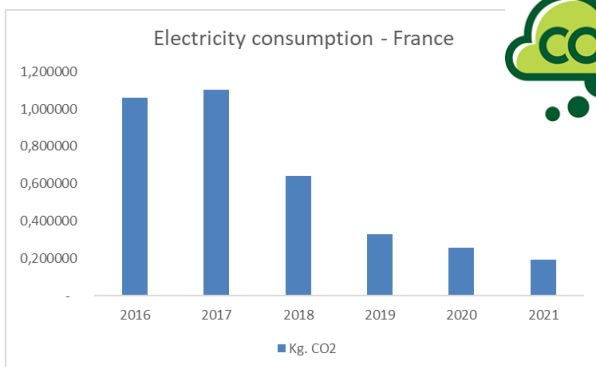
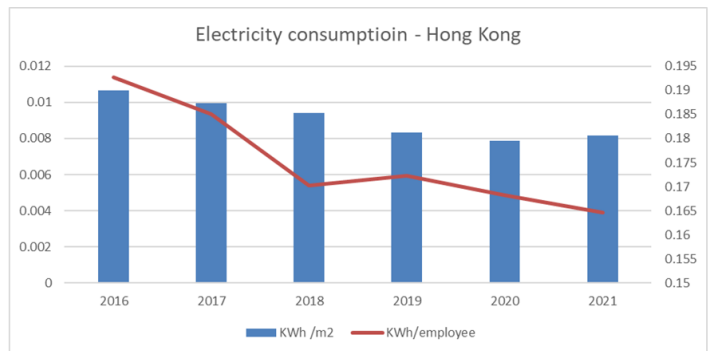
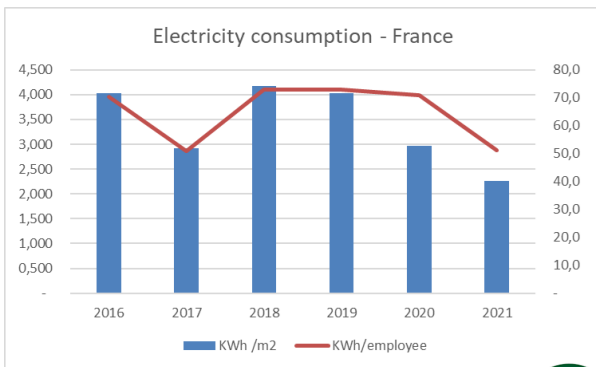
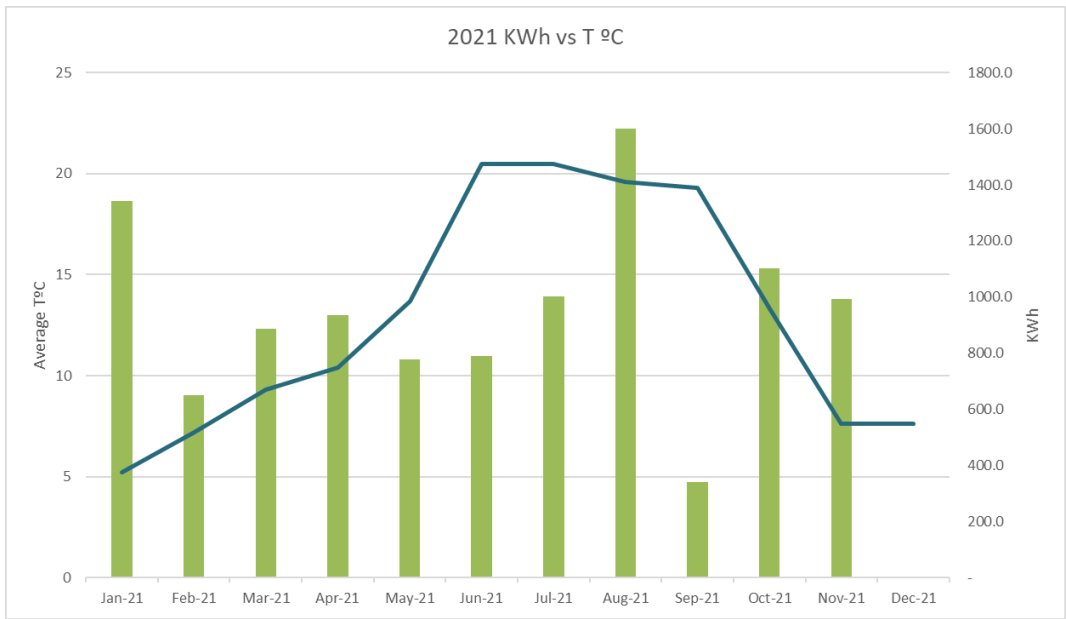
Consumption is being followed in a monthly basis compare with temperature for correlation with the consumption of heat our air conditioning. Ratio of the consumption to the surface and the number of employees is also monitored, as well as the CO<sub>2</sub>e, in a yearly basis.

### Results:

#### Electricity Hong Kong office: +4% vs 2020



## Electricity France office: -24% vs 2020



## 5.4 WATER



Our direct operation impact on water it is limited to the sanitary use in our office buildings. Our employees are aware of the simple behaviors for saving water. Both offices have automatic-off tabs. There are not separated counters for our rented offices for metering the impact.

## 5.5 WASTE



Waste separation (paper, carton, others): Hong Kong and France, handle by ATLINKS, in the other Sales representation offices managed by the business center where located.  
 Management of Hazardous Waste (WEEE from samples, toner cartridges, ink cartridges, batteries).

We use a specialized company to collect and treat all our waste produced at the French premises, and they can calculate the equivalence of savings to the planet benefit.  
 In Hong Kong, the same kind of waste are collected and put in the recyclable adapted bins. This collection is registered by the program GREENS\$.

### Result:

France:

2021	France	WEEE	Paper + carton box	Paper Confidential	Plastics		Batteries	Coffe caps
	<b>Total Kg France</b>	553	146	72	5	0	0	55



	Weight (kg)	Weight (Tonnes)	Trees saved	Litres of Water saved	CO2 saved (kg)	KWH saved
2018	254	0,25	4	7620	140	1016
2019	240	0,24	4	7200	132	960
2020	170	0,17	3	4950	91	660
2021	892	0,892	5	8520	156	1136

Hong Kong :

2021	HK	WEEE	Paper + carton box	Plastics	Batteries	Metals	Lamp	Glass
	<b>Total Kg Hong Kong</b>	25.4	7.7	36.4	0	3.5	0	1.3

## 5.6 TRANSPORTATION



One of the main ATLINKS's environmental impacts in its operations is Transportation. Since many years, we try to avoid the most polluting



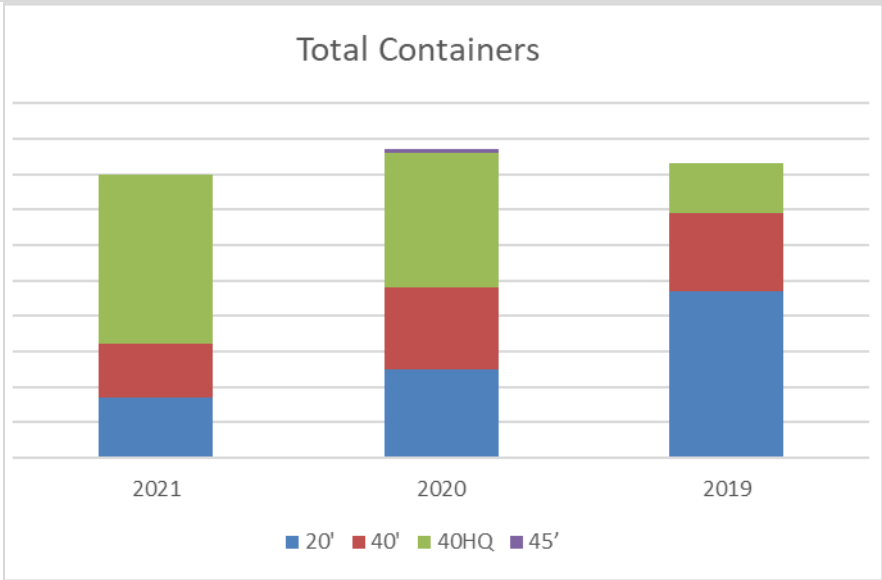
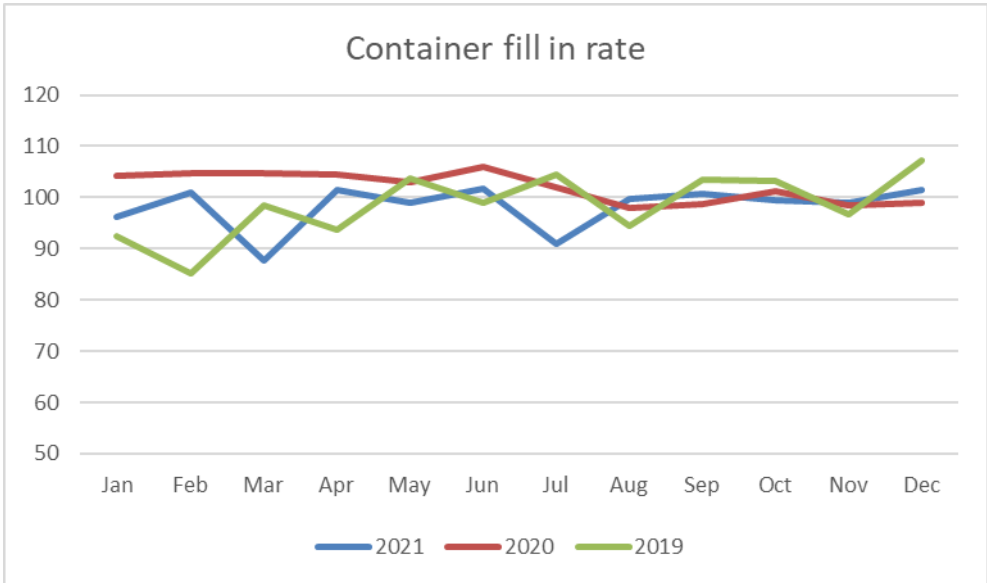
transportation (air) and we concentrate in the sea transportation for the inbound transport.

**5.6.1 INBOUND TRANSPORT**

One of our environmental programs has been to use higher size containers, optimize the containers capacity to be able to put a maximum of products using the same transport effort, thus reducing the CO2 impact for this activity.

**Result:**

- We have average rating of **fulfillment 98% in 2021** vs 102% in 2020 (general logistics difficulties in the industry).
- We increase the size of the containers: Transportation using **40HQ containers are 60% in 2021** vs 44% in 2020 and 17% in 2019

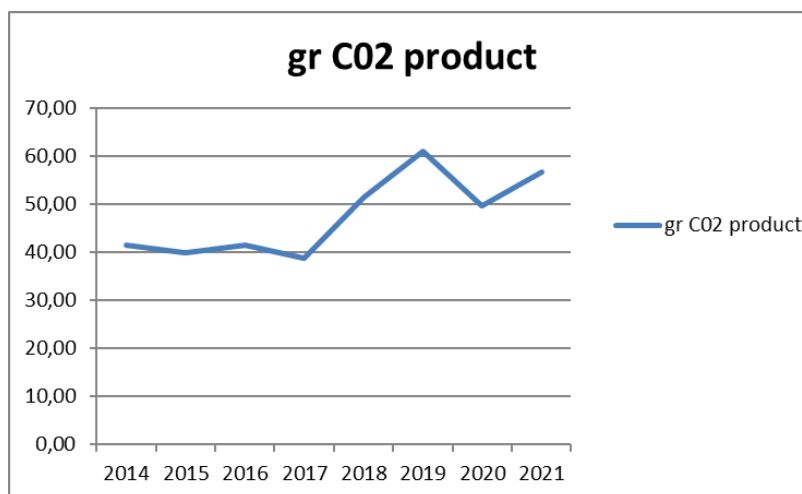
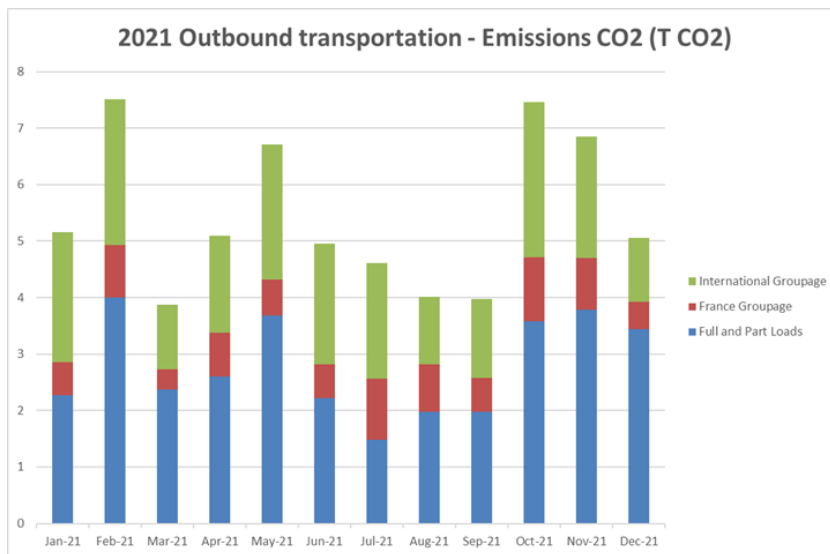


## 5.6.2 OUTBOUND TRANSPORT

Since the end of 2014 we are also following the outbound transportation, so we can eventually take some measures to reduce the impact. Our logistics 3<sup>rd</sup> party is an essential collaborator to support this action.

### Results:

- Total 65,28 T CO<sub>2</sub>e (+17% vs 2020)
- Increase on the CO<sub>2</sub>e per product (general logistics difficulties in the industry).



## 5.7 CHEMICALS MANAGEMENT

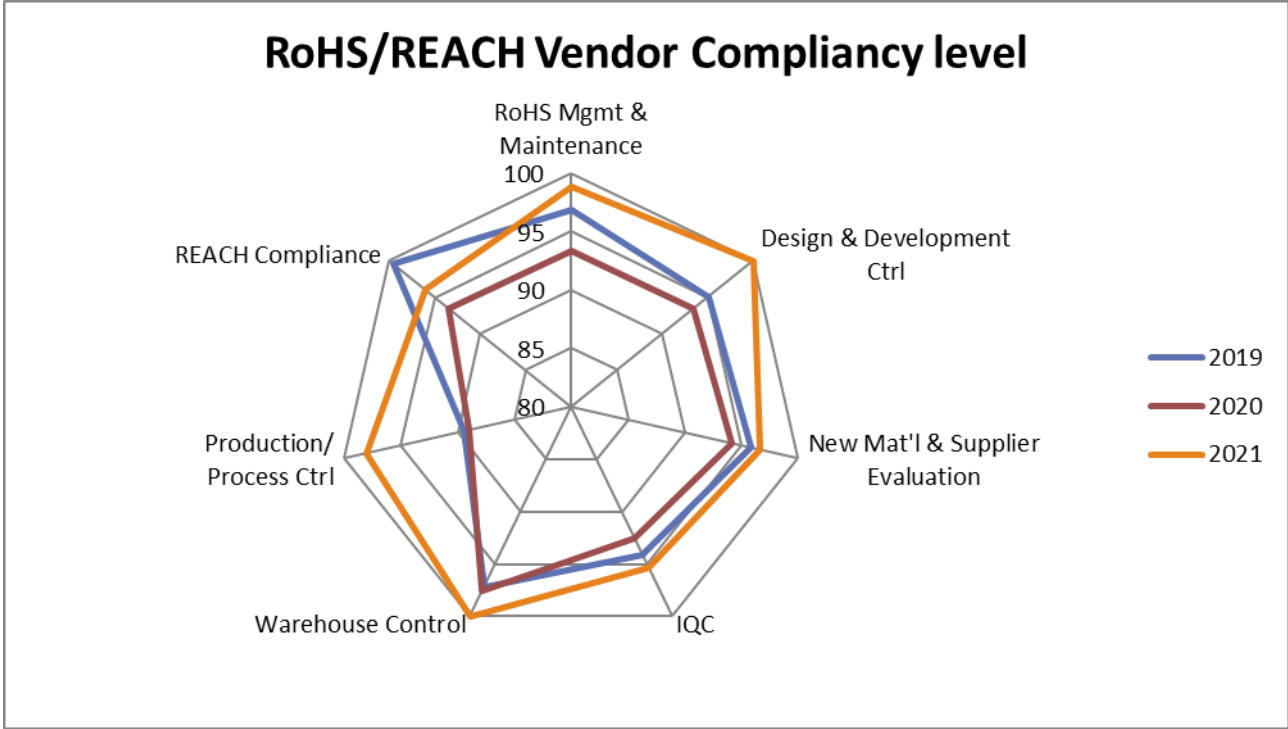
ATLINKS follows the regulations in force regarding the restriction of use of certain substances, and make sure that the products comply with all regulations in force regarding these aspects, in particular the RoHS (Restriction of Hazardous Substances) and REACH (Restriction, Evaluation, Authorization of Chemicals).

We request to the manufacturers to provide every year with the declaration of substances contained in each product and the compliancy with the RoHS regulation.

ATLINKS performs Suppliers Audits to make sure the control on those substances is made properly at the manufacturing sites. We also keep record of all the Certificates issued by our vendors in our Documentation system.

**Results:**

- Vendors audited: **100 %** of vendors.
- Objective 90% compliant, 2021 result **96%**.



**5.8 PRODUCTS END OF LIFE. RECYCLING**



ATLINKS participate with several organizations for the collection and recycling of the waste produced by the products all over Europe (**Take back programs**).

- Packaging
- WEEE
- Batteries

We declare the units put into market and weight of the different elements to be collected and contribute financially to the collection, recycling of the waste produced by our products.

We participate in several “take-back programs” to reduce those wastes.

	FRANCE	SPAIN	ITALY	GERMANY	UK
WEEE					
BATTERIES					
PACKAGING					

## 5.9 SUPPLIERS ENVIRONMENTAL ASSESSMENT

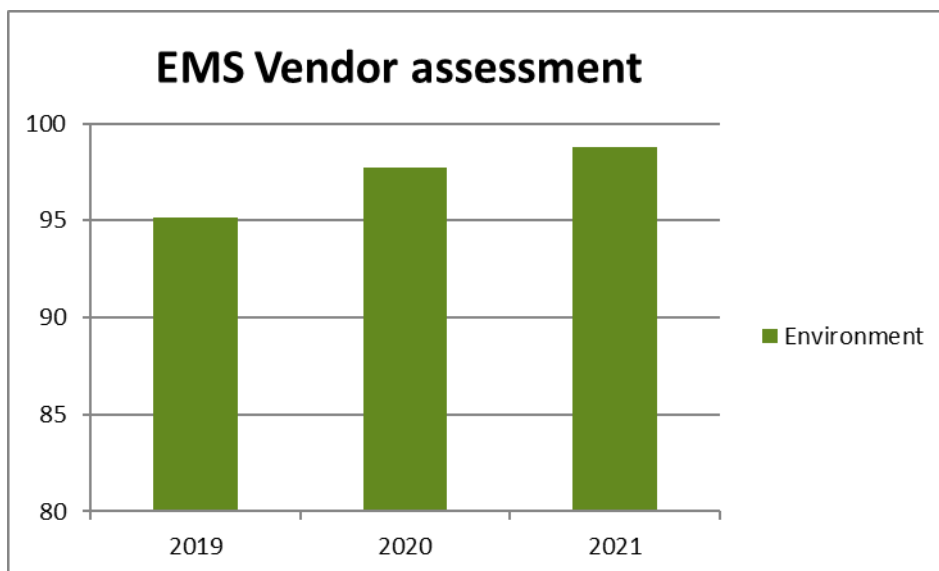


For ATLINKS its suppliers are one of the main stakeholders, and since many years a process of Selection and Evaluation of suppliers is being applied with success.

We evaluate by audits and rating our suppliers in their environmental management systems. The average rating from 0 to 100 is shown in the following chart for the 3 last years.

### Results:

- **100%** of vendors audited.
- Objective over 90% compliance, **2021 result 98,8%**



## 5.10 ATLINKS PREMISES

We have followed few programs:



Waste separation (paper, carton, others): Hong Kong and France, handle by ATLINKS, in the other Sales representation offices managed by the business center where located.

Management of Hazardous Waste (WEEE from samples, toner cartridges, ink cartridges)

Paper consumption monitoring (Hong Kong and France site)

EDI for many transitions with customers to avoid paper invoices (save paper and transport)

New management of Certificate of Origin, to avoid, paper, express courier between China and Europe.

## Results:

### Usage of Paper in premises:

Average daily pages consumption	2014	2015	2016	2017	2018	2019	2020	2021
<b>Hong Kong</b>	489	477	420	443	495	348	311	338
		-2.5%	-13.6%	5.2%	10.5%	-42.2%	-11.9%	8.0%
<b>France</b>	279	216	231	237	250	188	139	67
		-29.2%	6.5%	2.5%	5.2%	-33.0%	-35.3%	-107.5%

## 5.11 ENVIRONMENTAL COMPLIANCE

As part of the commitment of Compliance with laws and regulations in the frame of the Management systems certification, ATLINKS have given provisions to identify the applicable laws and regulations, evaluate its compliancy and regularly survey the modifications. Part of the provisions are the subscription to a specialized platform in France, Novallia (novallia.com), and the follow up of the Hong Kong related ordinances. ATLINKS keeps records and inform the management of the compliance situation every 6 months.

## 6 LABOR PRACTICES AND DECENT WORK

In ATLINKS operations countries we have been always respectful with the local laws and regulations which comply with the respect of the Human rights. We also have requested to our suppliers to be compliant with it and we make audits to all of them to ensure the compliancy.

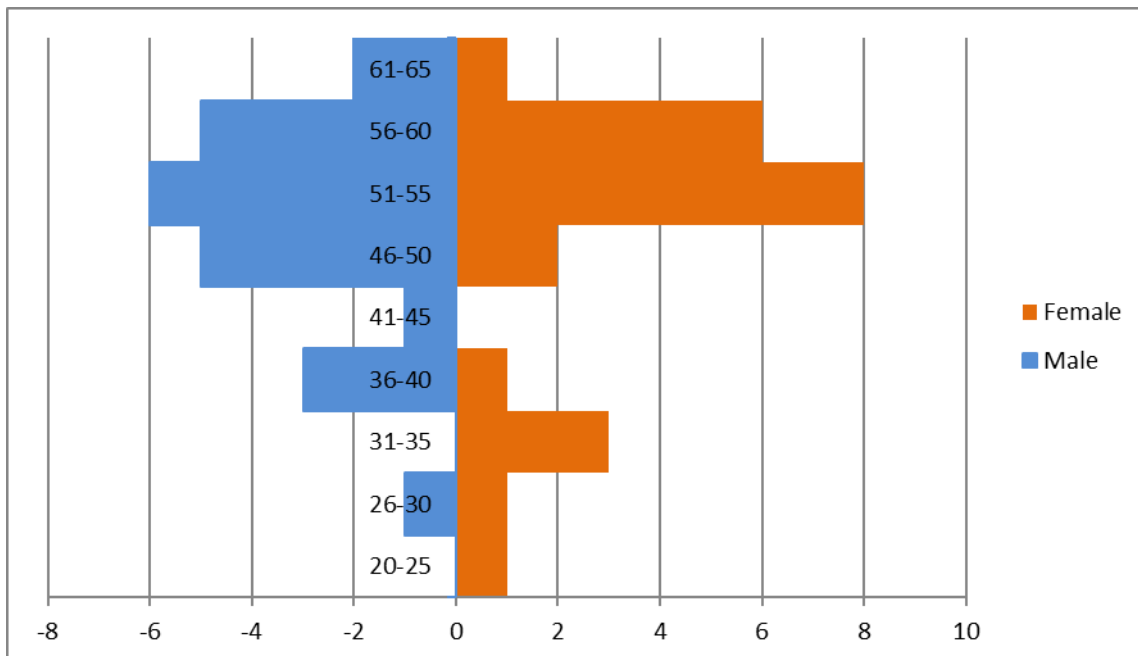
### 6.1 ATLINKS STAFF



Most of our staff is issued from the Joint-venture between Alcatel and Thomson in the early 2000's. We have a little turn-over and there is a natural equilibrium on female/male collaborators.

Management at first level of reporting to CEO is balanced female/male.

The recruitment level is very small, since the company had been structured at its creation in 2010 to the level of staff coherent to the operations in a very competitive and non-growing market.



## 6.2 EMPLOYEES INSURANCES AND MEDICAL CHECKS



All ATLINKS employees are entitled to a personal and family medical insurance, as well as travelers' insurance, when travelling on the company mission.

Wherever the regulations require a medical check, they are duly performed. Records are kept in the HR files.

## 6.3 CONTRACT OF PROGRESS. LABOR /MANAGEMENT RELATIONS

The management and the employees fix the objectives for the year. There are individual and team objectives. Those are reviewed in a year basis on a meeting of the employee with his manager.

It is also the moment where the competences and training can be reviewed. 100% of the employees are covered by this process.

### Result:

- All employees followed the review.

## 6.4 ORGANIZATIONAL HEALTH AND SAFETY PROGRAMS



Within the framework of the OHSAS Management systems the following programs have been deployed in relation with the hazards and risk level identified by the company and its employees.

## Health

- E-mail management guidance for the stress reduction (100% of staff)
- Ergonomic assessment on the use of computer and screen. (1 site Hong Kong)
- Office exercising guidance (2 sites France and Hong Kong)
- Anti-smoking campaign in the French subsidiary in November.
- Pandemics management following the government instructions. Adaptation to the changes.

## Safety

- Staff has been trained to the fire risk, by performing evacuation drills and the usage of fire extinguishers (2 sites, France and Hong Kong)
- First Aid Kit
- Driving safe chart published and sign by the company car drivers (100% of company drivers).
- Driving safe training has been provided to the company drivers. 100% of company drivers have completed the training.

## Results:

- ATLINKS has **0 accidents** in 2021.
- 1 Evacuation drill in France (even with some restrictions due to pandemics)
- 0 Evacuation drill in Hong Kong (restrictions on outdoor gathering since pandemics)

## 6.5 TRAINING AND AWARENESS



The aim of training is to contribute to the development of the competencies of the staff, to better address existing and future needs of the Company, and:

- To identify the technological and organizational evolutions,
- To anticipate and accompany professional evolutions of the staff according to the Company needs,
- To improve on the level of expertise, knowledge, and competency of the staff.

A training plan is established as per company and staff needs.

There are trainings and awareness meetings organized yearly on the field of Quality, Environment, Health and Safety and Sustainable development areas, for all the staff.

## Results:

- Training provided as per training plan in both entities
- Training Hours average per employee:
  - France: 2.8 hours/employee
  - Hong Kong: 4.5 hours/employee

## 6.6 DIVERSITY AND EQUAL OPPORTUNITY



ATLINKS is a very international company, with a mix of nationalities in each country where operates. There are "foreigners" in all entities:

Hong Kong: 2 nationalities (4% foreigners)  
France: 3 nationalities (11 % foreigners)  
Spain: 2 nationalities (25% foreigners)

- We do have a total of 4 nationalities belonging to 2 continents.
- Despite of being a technology company, there is a good balance in genders (male 50% and female 50%).

## 6.7 HANDICAP



The little turn-over and the lack of manpower growth, makes difficult to ATLINKS to hire handicapped people. However, a diagnostic has been performed by external consultant (Alther, Enterprises and Handicap) in February 2014 to improve the performance in this field.

A decision has been made and since then we have identified one supplier for dealing with the WEEE office waste, and the rest of office recyclable waste, who is an "ESAT" (*Établissement et services d'aide par le travail*) and can provide the Certification of equivalent timing worked for ATLINKS by handicapped staff.

### Results:

- In **2021** the cost of the handicapped labor is up to **2173,7 €**

## 6.8 SUPPLIERS ASSESSMENT ON HEALTH AND SAFETY



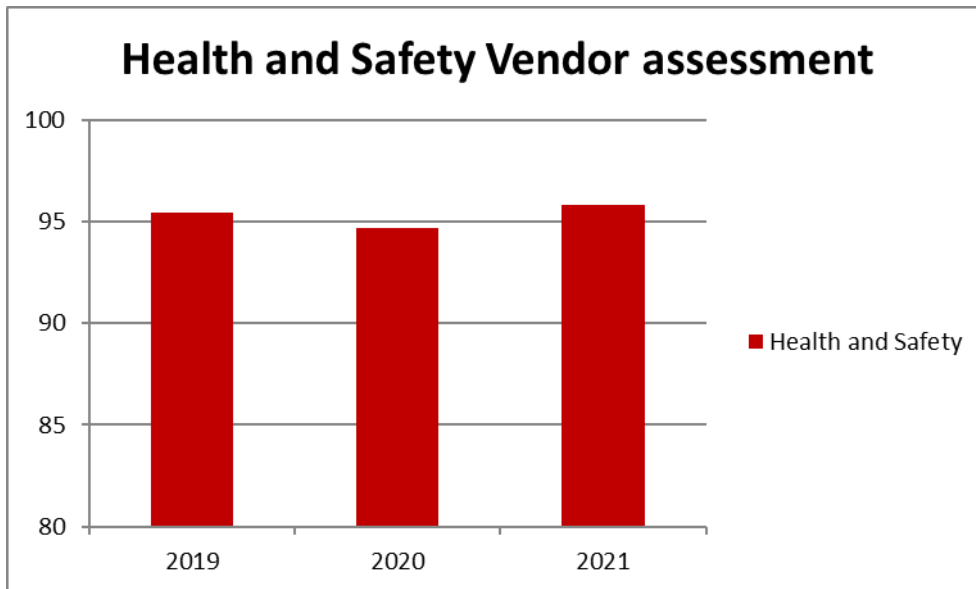
For ATLINKS its suppliers are one of the main stakeholders, and since many years a process of Selection and Evaluation of suppliers is being applied with success.

We evaluate by audits and rating our suppliers in the Health and Safety aspects. The average rating from 0 to 100 is shown in the following chart for the 3 last years.

### Result:

- **100 %** vendors audited.
- Objective is 90% compliant, in 2021 result **95,8%** compliant





## 6.9 COMPLIANCE ON HEALTH AND SAFETY

As part of the commitment of Compliance with laws and regulations in the frame of the Management systems certification, ATLINKS have given provisions to identify the applicable laws and regulations, evaluate its compliancy and regularly survey the modifications. Part of the provisions are the subscription to a specialized platform in France, Novallia (novalia.com), and the follow up of the Hong Kong related ordinances. ATLINKS keeps records and inform the management of the compliance situation every 6 months.

## 7 HUMAN RIGHTS

### 7.1 NON-DISCRIMINATION AND HARASSMENT

ATLINKS ensure that their employees are afforded an employment environment that is free from physical, psychological, and verbal harassment, or other abusive conduct, and provide equal employment opportunity to employees and applicants for employment without discrimination.

ATLINKS has provisions such as internal rules to ensure the respect of this principle, and ATLINKS displays these regulations publicly at its premises, for any employee or applicant to be aware of.

### 7.2 FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING



ATLINKS has always guaranteed the freedom of association in full compliance with current regulations. The employees are represented by electing their representatives.

Human Resources and Management are in direct contact with the

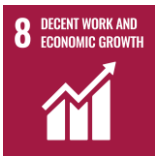
representatives and staff, with a formal and informal interchange of news and information.

In accordance with unions and/or representatives ATLINKS verifies the strict application and interpretation of provisions stated in the existing National Collective Labor Contract; performs and follows all stages of any negotiation.

### Results:

- Regular summary meetings are issued per year (mainly France and Spain sites)
- Elections are organized as per the local regulations: 2020 no candidates at representatives Election for France.

## 7.3 CHILD LABOR, FORCE AND COMPULSORY LABOR

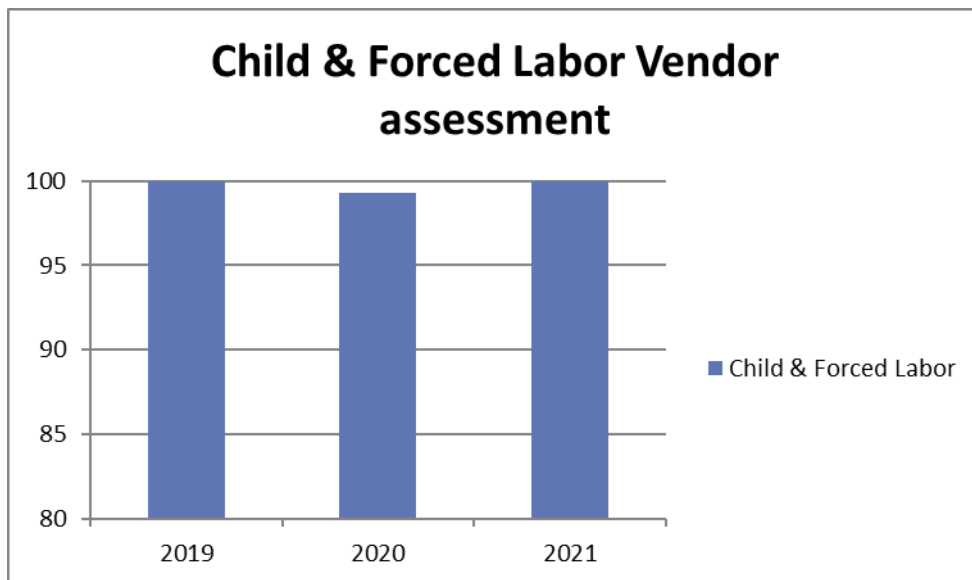


For ATLINKS its suppliers are one of the main stakeholders, and since many years a process of Selection and Evaluation of suppliers is being applied with success.

We evaluate by audits and rating our suppliers to avoid child labor and any compulsory or force labor. The average rating from 0 to 100 is shown in the following chart for the 3 last years.

### Result:

- 100 % vendors audited
- In 2021 result **100%** compliant.



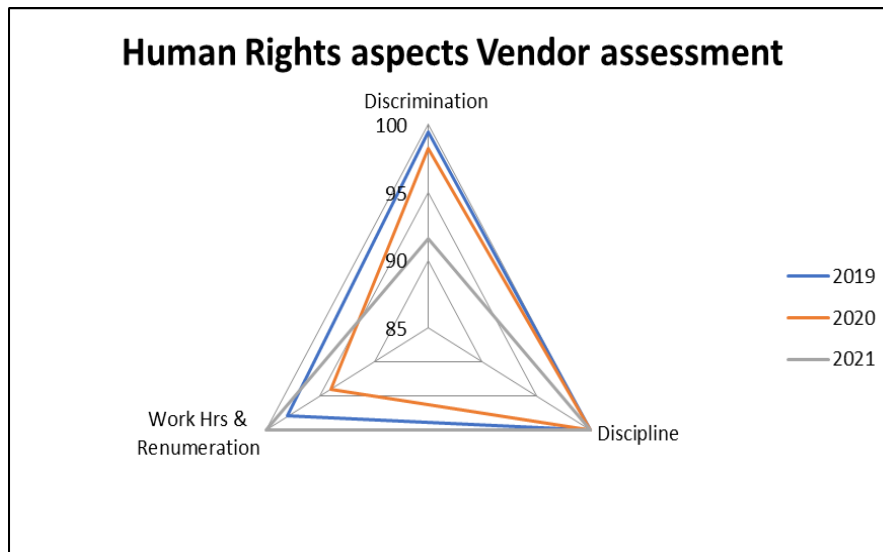
## 7.4 SUPPLIER HUMAN RIGHTS ASSESSMENT

For ATLINKS its suppliers are one of the main stakeholders, and since many years a process of Selection and Evaluation of suppliers is being applied with success.

We evaluate by audits and rating our suppliers to warranty the respect of human rights. The average rating from 0 to 100 is shown in the following chart for the 3 last years.

## Result:

- 100 % vendors audited.
- Objective 90% compliancy, 2021 result **97,2%** compliant.



## 7.5 SECURITY PRACTICES

As part of our Health and Safety Management systems ATLINKS follow the labor regulation to secure the activities of its employees and stakeholders. Based on the Safety risk assessment some provisions are put in place for security, such as regulatory verification and reviews of its safety installations, fire extinguishing means, and performing evacuation drills. Awareness and training are provided to the staff.



Company drivers have signed the "*Drivers Commitment Chart*" with strong commitments in security practices.

## 8 PRODUCT RESPONSIBILITY

### 8.1 CUSTOMER HEALTH AND SAFETY

ATLINKS cares about the Health and Safety of the users, and it complies with the relative European directives on Low voltage (2006/95/EC) and Electromagnetic compatibility (2004/108/EC).

Tests are performed to safety products before putting into market and keep records for compliancy demonstration.

Most of our products are tested against these directives even if they are not for Europe.

### 8.2 PRODUCT LABELING

Our products are labeled in conformity with the applicable laws and regulations: CE, cross-bin-wheel, and some other areas requirements.

## 8.3 SERVICE CENTER, CONSUMER SUPPORT



Within the frame of our Quality Management systems, we put the customers in the center of the targets. We do all the best to listen to them and give a maximum of satisfaction:

- We have a web site with customers interface to ask the questions related to product or our services
- We do provide our user's guides in an extended version, to include in the packaging only simpler version (less paper to print).
- We received letters to give us feedback in our service
- We have a Call Center (Hot line) to provide support for the use or what to do in case of doubts, or any quality issues with the products.
- We provide 2 years warranty for better satisfaction.
- We have implemented a Service Center to repair or refurbish the products.
- Service Center also provide a good information about the quality of the products and eventually the improvements to implement to avoid any quality problems, particularly in the NOT FAULT FOUND category, which indicate other issues than failure of the products
- The Service Center has an integrated Management System Certified, for Quality, Environment, Health and Safety and Information Security.
- The Service Center also manages the WEEE following the European Directive 2012/19/EU.

### Result:

- The return rate has been constantly decreased and arrive to a very low level, indicating a very reliable product.
- The second-year warranty appears to be a very little impact in our operations.
- The complaints from customers are become more compliments and just questions asked.
- The hot line provides a good service level.
- The products are more reliable and then less Waste to produced.
- The information provided to the customers makes the need to bring the products to the Service Center avoiding unnecessary transportation or refurbished products.
- The extended version of user's guide available on the web makes less paper to print, less weight to transport and less waste to handle at the end of life for products.
- High level of reparability index for our mobile phones:



- The service provided by our repairing system during 2020 has avoided: 61491 kgCO<sub>2</sub>e (Method Bilan Carbone®) , 91% ratio CO<sub>2</sub>e avoided.



## 8.4 CUSTOMER PRIVACY

ATLINKS applies the Regulation n°2016/679 from 27 April 2016, also known as General *Data Protection Regulation (GDPR)* related to the protection of the data of its customers and makes it mandatory for any suppliers in contact with its customers to respect it. A specific program is established to make sure all the requirements of the directive are followed.

- ATLINKS subcontracts a Data Center (Scaleway) and a Service Center (Ingram), both have an Information Security Management Systems, Certified ISO 27001 to warranty the technical means to safeguard the customer data.
- ATLINKS manage paper confidential information by using a protected bin, collected few times a year. Certificate of destruction is issued by the company handling this sensitive waste (Cèdre)

## 8.5 PRODUCT COMPLIANCE

ATLINKS has a process in place to follow the different regulations, thru alerts, webinars, seminars, newsletters, and some external assessments by notified bodies, to follow the European regulations. For other areas we rely on a network of professionals (technical people, labs, and commercial people) to provide the changes applicable to ATLINKS.

The compliancy to regulations is one of the main requirements to put products in the market.

## 8.6 PRODUCT EXTERNALS EVALUATIONS (ECO-RATING)

ATLINKS participates to an initiative done by one of its customers to the evaluation of the products Environmental performance called Eco-rating, with the contribution of WWF.

The Environmental performance of the products is based on:

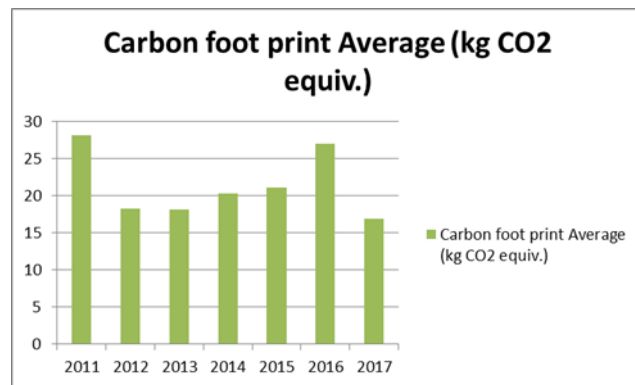
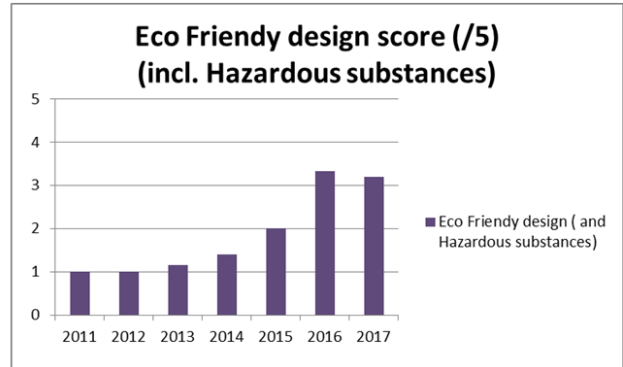
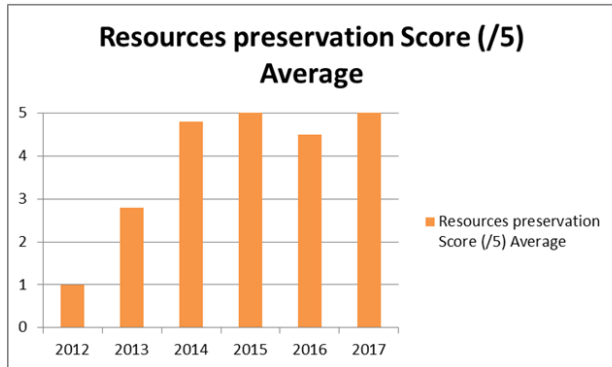
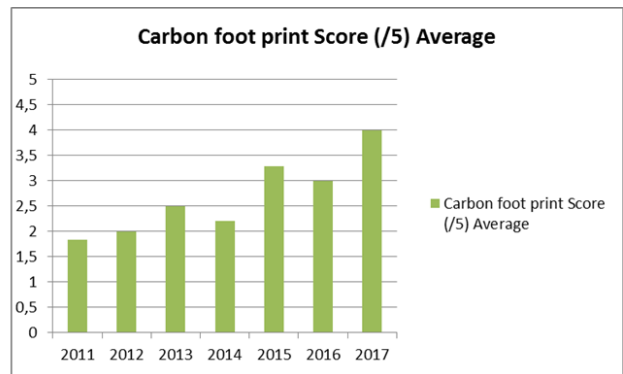
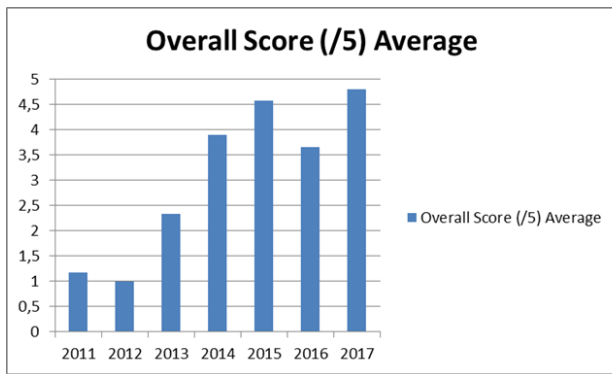
CO2 footprint for the product (simplified calculation with specific methodology)  
Natural resources preservation evaluation  
Eco-design

The marks are in a 5 basis and are displayed in the shops and the website.

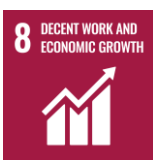
### Result:

ATLINKS keeps the track of record for 6 years.





## 8.7 CONFLICT MINERALS TRACEABILITY



ATLINKS is not a manufacturer, but we have been questioning our vendors on the use of some metals like: Gold, Silver and Tin.

In this process there is also the concept of Origin of Rare metals, and its traceability.

We are putting in place a process to request the traceability for information to our main suppliers of fixed and mobile phones (top 5 of our purchase value), to study the following metals origin: Gold, Tin, Tungsten, Tantalum (3TG) and Cobalt.

Process:

1. Conflict Mineral Reporting Templates based on Responsible Minerals initiative, are sent to our vendors once every two years.
2. We question main vendors

3. Collection of data and analysis
4. Record the information on our Documentation System.

## Result:

- We have received the completed CMRT questionnaire 100% fulfilled, for the 6 main suppliers representing 98% of our sales worldwide in 2021.

	Supplier 1	Supplier 2	Supplier 3	Supplier 4	Supplier 5	Supplier 6
<b>1) Is any 3TG intentionally added or use in the products or in the production process? (*)</b>						
Tantalum (*)	Yes	Yes	Yes	Yes	No	No
Tin (*)	Yes	Yes	Yes	Yes	Yes	Yes
Gold (*)	Yes	Yes	Yes	Yes	Yes	Yes
Tungsten (*)	Yes	Yes	Yes	Yes	No	No
<b>2) Does any 3TG remain in the product? (*)</b>						
Tantalum (*)	Yes	Yes	Yes	Yes	-	-
Tin (*)	Yes	Yes	Yes	Yes	Yes	Yes
Gold (*)	Yes	Yes	Yes	Yes	Yes	Yes
Tungsten (*)	Yes	Yes	Yes	Yes	-	-
<b>3) Do any of the smelters in your supply chain source the 3TG from the covered countries? (*)</b>						
Tantalum	No	Yes	No	No	-	-
Tin (*)	No	Yes	No	No	No	Yes
Gold (*)	No	Yes	No	No	No	Yes
Tungsten	No	Yes	No	No	-	-
<b>4) Do any of the smelters in your supply chain source the 3TG from the conflict-affected and high-risk areas? (*)</b>						
Tantalum	No	Yes	No	No	-	-
Tin (*)	No	Yes	No	No	No	No
Gold (*)	No	Yes	No	No	No	No
Tungsten	No	Yes	No	No	-	-
<b>5) Does 100 percent of the 3GT (necessary to the functionality or production of your products) originate from recycle or scrap sources? (*)</b>						
Tantalum	No	No	No	No	-	-
Tin (*)	No	No	No	No	No	No
Gold (*)	No	No	No	No	No	No
Tungsten	No	No	No	No	-	-
<b>6) What percentage of relevant suppliers have provided a response to your supply chain survey? (*)</b>						
Tantalum	100%	100%	100%	100%	-	-
Tin (*)	100%	100%	100%	100%	100%	100%
Gold (*)	100%	100%	100%	100%	100%	100%
Tungsten	100%	100%	100%	100%	-	-
<b>7) Have you identified all the smelters supplying the 3TG to your supply chain? (*)</b>						
Tantalum	Yes	Yes	Yes	Yes	-	-
Tin (*)	Yes	Yes	Yes	Yes	Yes	Yes
Gold (*)	Yes	Yes	Yes	Yes	Yes	Yes
Tungsten	Yes	Yes	Yes	Yes	-	-
<b>8) Has all applicable smelter information received by your company been reported in this declaration? (*)</b>						
Tantalum	Yes	Yes	Yes	Yes	-	-
Tin (*)	Yes	Yes	Yes	Yes	Yes	Yes
Gold (*)	Yes	Yes	Yes	Yes	Yes	Yes
Tungsten	Yes	Yes	Yes	Yes	-	-
<b>Questions Company related</b>						
<b>A. Have you established a conflict minerals sourcing policy? (*)</b>	Yes	Yes	Yes	Yes	Yes	Yes
<b>B. Is your conflict minerals sourcing policy publicly available on your website? (Note – If yes, the user shall specify the URL in the comment field.) (*)</b>	Yes	No	Yes	No	No	No
<b>C. Do you require your direct suppliers to source the 3TG from smelters whose due diligence practices have been validated by an independent third party audit program? (*)</b>	Yes	Yes	Yes	Yes	Yes	Yes
<b>D. Have you implemented a due diligence measures for responsible sourcing? (*)</b>	Yes	Yes	Yes	Yes	Yes	Yes
<b>E. Does your company conduct Conflict Minerals survey(s) of your relevant supplier(s)? (*)</b>	Yes, in conformance with IPC1755 (e.g., CMRT)	Yes, in conformance with IPC1755 (e.g., CMRT)	Yes, in conformance with IPC1755 (e.g., CMRT)	Yes, in conformance with IPC1755 (e.g., CMRT)	Yes, in conformance with IPC1755 (e.g., CMRT)	Yes, in conformance with IPC1755 (e.g., CMRT)
<b>F. Do you review due diligence information received from your suppliers against your company's expectations? (*)</b>	Yes	Yes	Yes	Yes	Yes	Yes
<b>G. Does your review process include corrective action management? (*)</b>	Yes	Yes	Yes	Yes	Yes	Yes
<b>H. Is your company required to file an annual conflict minerals disclosure with the SEC? (*)</b>	Yes, with the EU	No	Yes, with the EU	Yes, with the EU	No	No

## 9 SOCIETY

### 9.1 COMMUNITY INVOLVEMENT AND DEVELOPMENT

#### 9.1.1 ELDERLY DEDICATED PRODUCT RANGE



ATLINKS has dedicated 2 brands to develop products for the access of technology to the elderly.

The specific design and functionalities are helping to elderly people for an easier access to communication, and leisure.

By this action we integrate the elderly into the digital society, facilitate the intergenerational communication and give access to information in an adapted way.

#### Results:

- 2 full ranges of products including fixed line, mobile phones, TV headsets, and hearing aid compatible communication products have been specially developed for this kind of population.
- 2 brands dedicated to elderly people.

#### 9.1.2 EMMAÜS- JUNE 2019



Since many years we donate to Emmaüs some of our stock of product.

ATLINKS Europe donated over **119 phones** in perfect working conditions to be sold in the "solidarity day sales" organized by Emmaüs in Paris in 2019. Since 2020 the event did not take place due to the pandemic.

**Emmaus (Emmaüs)** is an international solidarity movement founded in Paris in 1949 by friar Abbé Pierre to combat poverty and homelessness. Group of associations present in 39 countries.





### 9.1.3 TÉLÉTHON: OCTOBER TO DECEMBER 2020



Since 2015 every end of the year and in collaboration with Screlec, ATLINKS team participate at a special collection of batteries in our premises for giving a donation to the **Téléthon**. **18 kilograms** of batteries and accumulators are collected by the contribution of the Europe employees.

**Téléthon** is a televised fundraising event that lasts many hours or even days, the purpose of which is to raise money for medical research in the domain of rare sickness.



### 9.1.4 NOVEMBER WITHOUT SMOKING



ATLINKS sticks to the French campaign to **fight against the smoking** habit. Awareness Display has been put all over the French office as well as in the building (even it is not strictly ATLINKS' responsibility): elevator, entrance hall.



## 9.2 ANTI-COMPETITION AND RESPONSIBLE MARKETING



ATLINKS protects and respects the intellectual property by means of contractual commitment with suppliers and customers. Specific legal counsel support is assigned whenever necessary for ensuring these aspects.

### Result:

- 0 reports on anti-competition by any stakeholder

Our Customer Service it is open to contact with final customers by different means: standard mail, e-mail, phone, etc. We put at customer disposition also a Hot line to help customer with any difficulties or information required.

We answer to any question whenever customers ask to us, providing satisfactory service not only with our products but with any information regarding our practices.

We do have *Customer Complaints procedure* that covers all questions in quality, environment, or CSR issues.

### Result:

- Most of the customer letters or emails are inquiries or request for documentation.
- No CSR issues reported this year.

## 9.3 CSR SUPPLIERS – AUDITS



Our Product Manufacturing suppliers are one of our main stakeholders and are considered as partners by ATLINKS. We do have a long relationship with most of them, but we are always in the move of qualifying new partners for new kind of products.

ATLINKS has a *Manufacturing Supplier Code of Conduct*, to which every supplier must stick to compliance. This Code of Conduct covers all the domains where ATLINKS require attention: Compliance, Human Rights, Child Labor, REACH and RoHS, Environment, Health and Safety, among other requirements.

Our *Suppliers Selection and Evaluation process* is running for many years, and we do have an excellent track of record for all of them.

We do request to them to have different Certified Management Systems: Quality and Environmental; and to achieve the maximum of our confidence, a Health and Safety Management Systems, and a Social Accountability Management System.

We also monitor by audits the compliance with the RoHS and REACH regulations to avoid hazardous and prohibited substances in our products (already reported above in this document).

The Selection and Evaluation is based in many criteria, and apart for most of the Quality, Financial, and Operational, we also include Corporate Social Responsibility, listed in the Manufacturing Suppliers Code of Conduct.

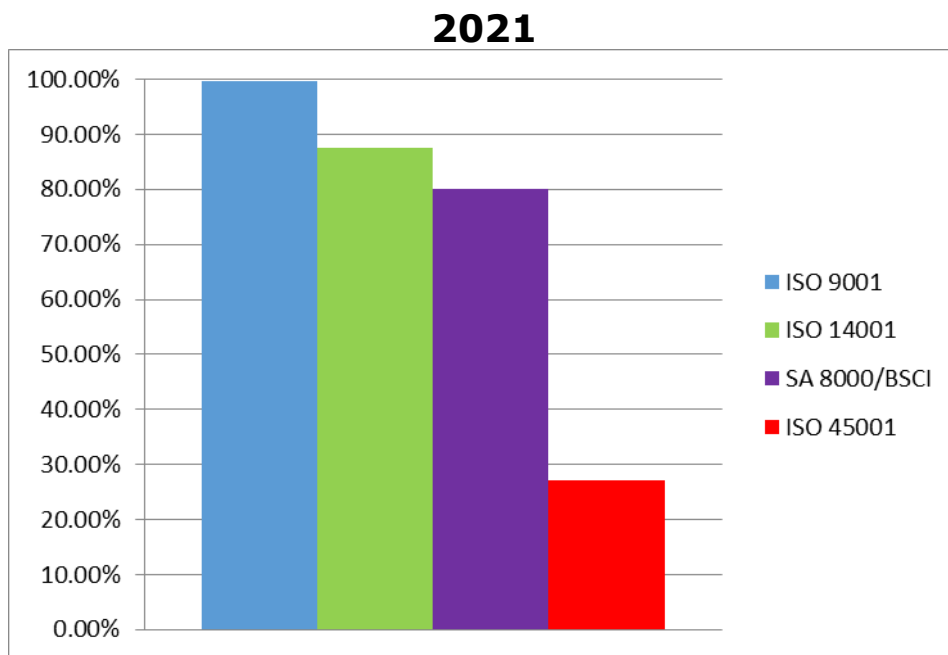
We do perform every year a complete Evaluation on those criteria for 100% of our Product Suppliers.

Whenever a supplier is not more in our standards and it is not capable to provide the appropriate corrective actions, we can disqualify them.

**Results:**

- Percentage of Suppliers who has signed the Supplier Code of Conduct: 100%
- Other Certifications of Suppliers:

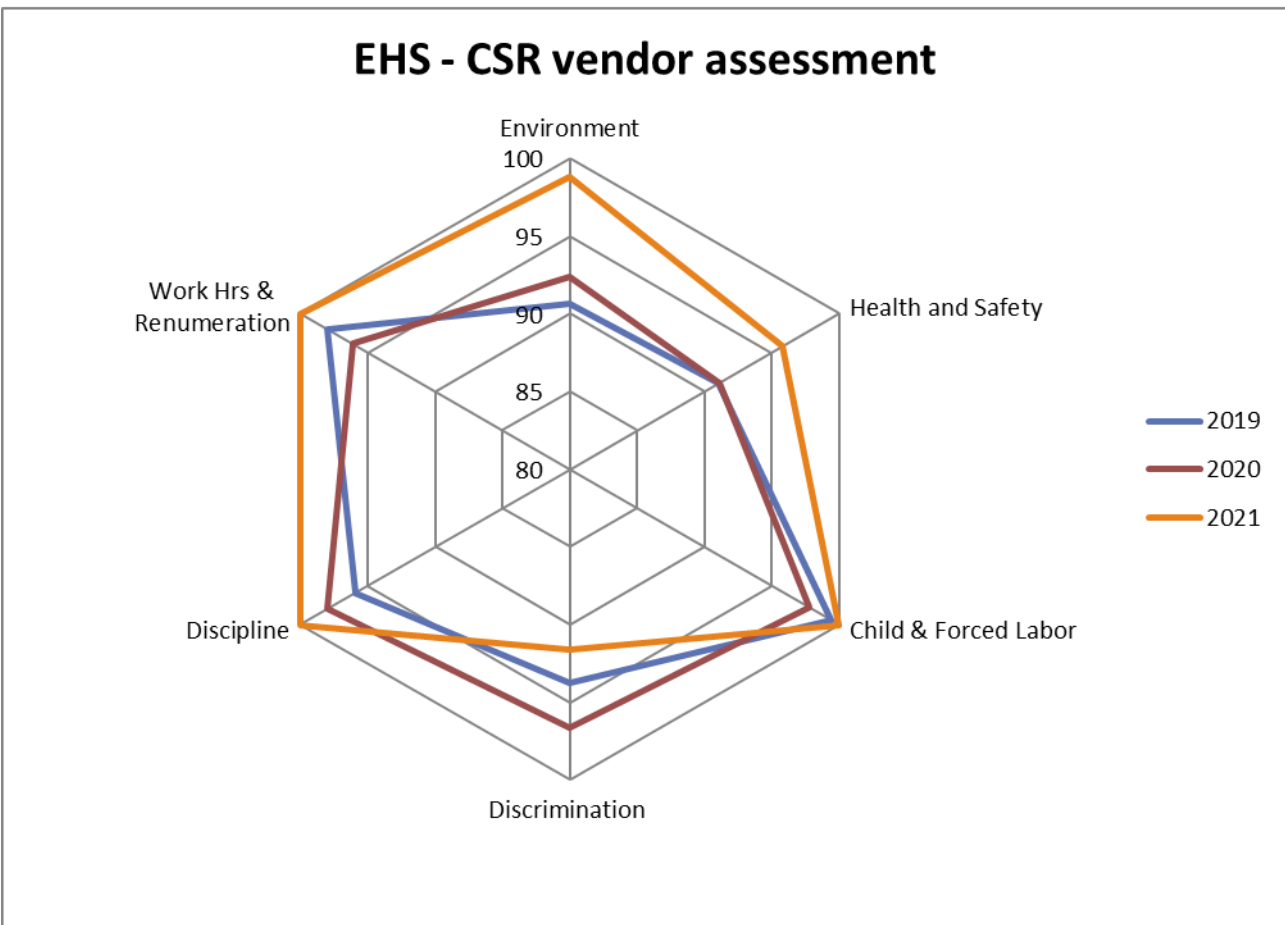
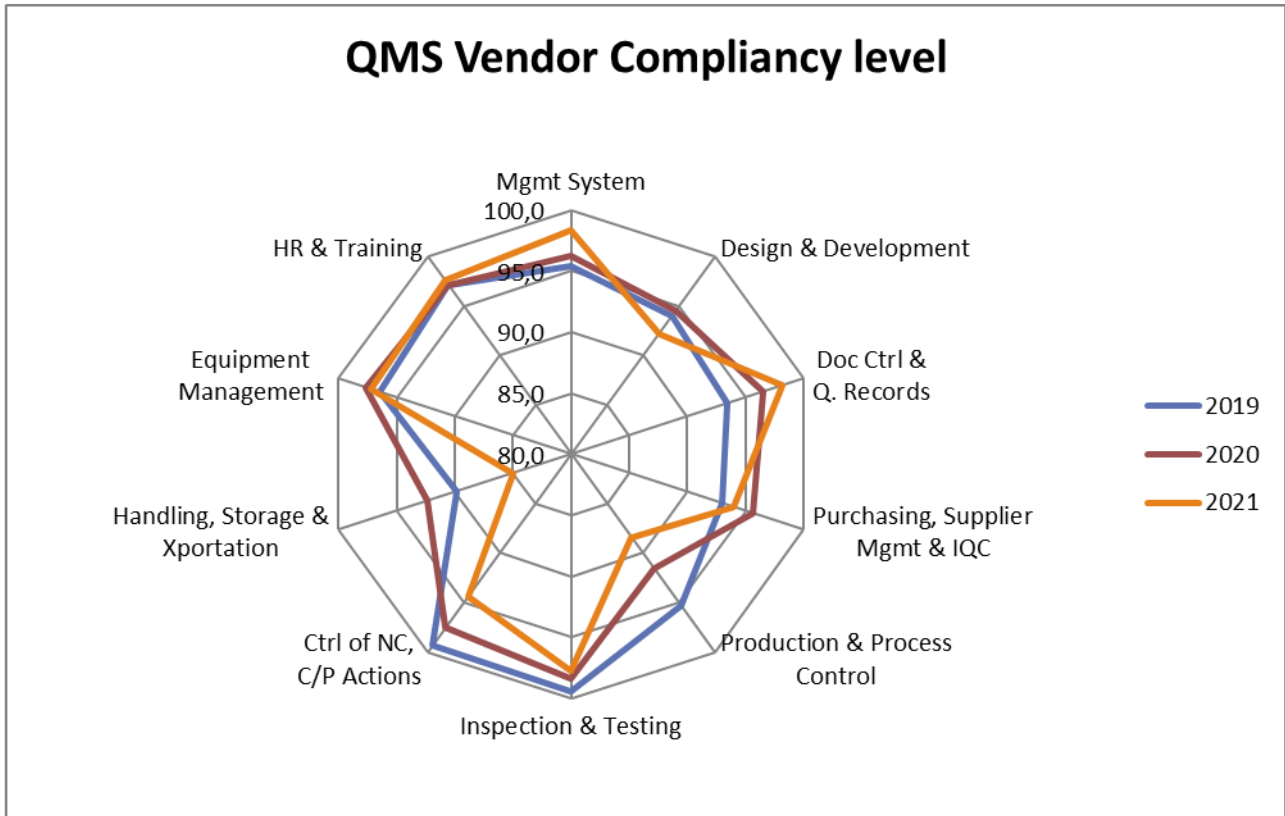
Percentage of Purchased products Worldwide (value) coming from Certified Suppliers, holding different kinds of Certifications.



**Percentage of Manufacturing Suppliers Audited**

- Audits QMS: 100% of active vendors
- Audits EHS-CSR: 100% of active vendors
- Audits RoHS/REACH: 100% of Active vendors (shown in previous pages)

## Results on Audits: Quality and EHS-CSR



## 9.4 EXTERNAL EVALUATIONS (ECOVADIS)

EcoVadis operates the 1st collaborative platform allowing companies to assess the environmental and social performance of their suppliers on a global basis. EcoVadis combines technology and Corporate Social Responsibility (CSR) expertise to deliver simple and reliable supplier scorecards, covering 150 purchasing categories and 21 CSR criteria.

The EcoVadis methodology framework assesses the policies and measures put in place as well as the reporting published by companies with regards to environmental, labor practices & human rights, fair business practices and sustainable procurement issues. The assessment conducted by CSR experts is made based on the company answers to a survey which is dynamically adapted to their country, sector and size, on the basis of supporting documentation, and on public and stakeholder (NGOs, trade unions, press) information.

ATLINKS is framed in the Category/Industry **“Manufacture of communication equipment”**, even it has not its own manufacturing facilities, the products commercialized by ATLINKS have its own brands Swissvoice, Amplicomms and a licensed brand Alcatel, and then it can be considered as a manufacturer. This category is much more demanding than the “wholesaler” type.

Actions based on the detailed report issued by EcoVadis have been taken to improve ATLINKS performance in the CSR results for next year.






### Result:

**1.-ATLINKS** has confirmed its commitment to the Corporate Social Responsibility by obtaining the **Platinum level of recognition**, and the “Advanced” level in 2021.



## 2.- EcoVadis Awards

For the 5th year in a row, ATLINKS has obtained the **highest score in its category, and its area** being awarded for it.

March 2021	March 2020	March 2019	April 2018	May 2017
<p>Winner of the Sustainability Leadership Best Regional Performance Award (China)</p> <p>Best performer worldwide in the category "Advanced Manufacturing"</p>	<p>Best performer worldwide in the category "Advanced Manufacturing"</p>	<p>Winner of the Sustainability Leadership Best Regional Performance Award (China), for the best score in the area among all different activity sectors</p>	<p>Winner of the Sustainability Leadership Best Regional Performance Award (China), for the best score in the area among all different activity sectors</p>	<p>Winner of the Sustainability Leadership Regional Award AMEA, for the best score in the area among all different activity sectors</p>
				
<p><a href="https://resources.ecovadis.com/news-press/ecovadis-announces-winners-of-2021-sustainable-procurement-leadership-awards">Sustainability Leadership Award Winners Sustain 2021 (ecovadis.com)</a></p>	<p><a href="https://resources.ecovadis.com/sustainability-conference/sustainability-leadership-awards-sustain-2020">https://resources.ecovadis.com/sustainability-conference/sustainability-leadership-awards-sustain-2020</a></p>	<p><a href="https://resources.ecovadis.com/news-press/ecovadis-announces-winners-of-2019-sustainable-procurement-leadership-awards-2">https://resources.ecovadis.com/news-press/ecovadis-announces-winners-of-2019-sustainable-procurement-leadership-awards-2</a></p>	<p><a href="https://resources.ecovadis.com/news-press/ecovadis-announces-winners-of-2018-sustainable-procurement-leadership-awards">https://resources.ecovadis.com/news-press/ecovadis-announces-winners-of-2018-sustainable-procurement-leadership-awards</a></p>	<p><a href="https://resources.ecovadis.com/news-press/ecovadis-announces-winners-of-first-ever-sustainability-sustainable-procurement-leadership-awards">https://resources.ecovadis.com/news-press/ecovadis-announces-winners-of-first-ever-sustainability-sustainable-procurement-leadership-awards</a></p>

# 10 ANNEXES

## 10.1 COMPANY POLICY



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Atlinks designs, develops, markets and sells voice, video, multimedia and **elderly-dedicated** communication terminals, to operators and to professional and consumer retail sales channels all around the world

The company is committed to:

1. - Create value for its customers by consistently providing products and services that meet or exceed **Customer's expectations** as measured by:
  - **Product Innovation and Performance**
  - Delivery Commitment
  - Price Competitiveness
- 2.- Implementing programs and procedures with an intent to meet or exceed all applicable **Laws and Regulations** regarding Products, Environment and Occupational Health and Safety; and other requirements from stakeholders to which Atlinks subscribes.
- 3.- To the protection of the environment and its employees , by putting in place the best management practices for **Prevention** of Pollution at its source, Injury and ill Health of its employees and stakeholders, involving employees and their representatives on the risks identification, and to protect the confidentiality, integrity and availability of our Information Systems.

To assure ongoing progress, the company will focus on five areas:

<b>People</b>	<ul style="list-style-type: none"><li>➤ <b>Encourage Innovation</b>, Enhance Leadership and Promote Teamwork</li><li>➤ Act with clarity, integrity and honesty</li><li>➤ Providing Safe working conditions and encourage our suppliers to do so</li><li>➤ Look after the health to the business contributors</li><li>➤ Respect and make respect the human rights</li></ul>
<b>External Relations</b>	<ul style="list-style-type: none"><li>➤ Satisfy customer's expectations</li><li>➤ Continuously benchmark with competition</li><li>➤ Develop close partners relationships with stakeholders</li></ul>
<b>Environmental</b>	<ul style="list-style-type: none"><li>➤ Improve the Products' environmental impact together with our suppliers</li><li>➤ Transportation optimization</li></ul>
<b>Social and Ethics</b>	<ul style="list-style-type: none"><li>➤ Develop the culture of Social Accountability inside Atlinks and to its stakeholders</li><li>➤ Promoting the Code of Conduct and fight against corruption</li></ul>
<b>Measurements and Progress</b>	<ul style="list-style-type: none"><li>➤ Monitor with key measurements</li><li>➤ Progress by following stakeholders' feed back</li><li>➤ Focus on continual improvement</li></ul>

I undertake to allocate the necessary resources to implement this Policy, to follow up its efficiency and effectiveness and to communicate internally the importance of the Customer and stakeholders' expectations, Environment respect, Safety for employees and stakeholders, and Regulatory Rules, and to identify and minimize any risk.

I appoint the QHSE-CSR Management System representative, to promote this Policy, and to safeguard the customer's satisfaction within the company.

September 2019  
**C. H. TONG** - CEO 

QPOL\_QUA\_WW\_002\_OH\_V9\_SEPTEMBER 2019



## 10.2 CODE OF CONDUCT

### SUMMARY - CODE OF CONDUCT

The ATLINKS Code of Conduct outlines expected behaviors for all ATLINKS employees and consultants. A complete **handbook** and **tools** are available to properly implement this policy.

ATLINKS will conduct its business **fairly, impartially**, in an **ethical** and **proper manner**, in full **compliance with all applicable laws and regulations**, and consistent with the **ATLINKS Policy**.

In conducting its business, **integrity** must underlie all company relationships, including those with customers, suppliers, and communities and among employees.

The highest standards of **ethical business conduct** are required of ATLINKS employees in the performance of their company responsibilities. Employees will not engage in conduct or activity that may raise questions as to the company's **honesty, impartiality, reputation** or otherwise cause embarrassment to the company.

Any employee of ATLINKS Company will ensure that:

- He/She will not engage in any activity that might create a **conflict of interest** for him/her or the company.
- He/She will not take advantage of his/her ATLINKS position to seek personal gain through the inappropriate use of ATLINKS or non-public information or abuse his /her position.
- He/She will follow all restrictions on use and disclosure of information.  
This includes following all requirements for **protecting ATLINKS information** and ensuring that non-ATLINKS proprietary information is used and disclosed only as authorized by the owner of the information or as otherwise permitted by law.
- He/She will observe **fair dealing** in all of his/her transactions and interactions.
- He/She will remain **politically neutral** and avoid making political contributions on behalf of ATLINKS.
- He/She commits to prevent **bribery**.
- He/She will protect all company, customer and supplier assets and use them only for appropriate company-approved activities.
- Without exception, He/She will **comply with all applicable laws, rules and regulations**.
- He/She will promptly **report any illegal or unethical conduct** to management or other appropriate authorities (i.e., Ethics, Law, Security,..).

Every employee has the responsibility to ask questions, seek guidance, and report suspected violations of this Code of Conduct.

ATLINKS provide **training** to all employees and consultants based on **the United Nations Convention Against Corruption**.

This document is a summary of the Internal Control “Code of Conduct”, dated 1/08/2017



## 10.3 CERTIFICATES

# QUALITY MANAGEMENT SYSTEMS

Certificat FR11/00604

Le système de management de

**Atlinks Holdings Limited**

Room 1818, 18/F, Nan Fung Commercial Centre  
19 Lam Lok Street, Kowloon Bay, Kowloon  
HONG KONG

a été audité et certifié selon les exigences de

**ISO 9001 : 2015**

Pour les activités suivantes  
Design, development, marketing and sales of fixed-line and mobile telephones, video and multimedia terminals, to operators and to professional and consumer retail sales channels all around the world.

Conception, développement et distribution à travers le monde de téléphones connectés à la ligne fixe et aux réseaux mobiles, ainsi que de terminaux vidéo et multimédia destinés aux réseaux professionnels, grand public et opérateurs.

Diseño, desarrollo, marketing y ventas a nivel mundial de teléfonos conectados a líneas fijas y móviles, terminales vídeo y multimedia destinados a las redes de distribución profesionales, gran público y operadores.

Ce certificat est valable du 10 octobre 2020 au 9 octobre 2023  
Et reste valable sous réserve des audits de surveillance satisfaisants  
Version 8. Date de première certification octobre 2011  
Ceci est une certification multiséite  
La liste des sites additionnels est mentionnée dans la page suivante

Autorité par



SGS ICS  
25, avenue Aristide Briand 94111 Arcueil Cedex France  
t +33 (0)1 41 24 87 75 f +33 (0)1 73 01 71 29 www.sgs.com



Page 1 de 2

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Certificat FR11/00604, suite

**Atlinks Holdings Limited**

**ISO 9001 : 2015**

Version 8

Sites additionnels

Atlinks Asia Limited  
Room 1818, 18/F, Nan Fung Commercial Centre  
19 Lam Lok Street, Kowloon Bay, Kowloon  
Hong Kong

Atlinks Europe SAS  
147 Avenue Paul Doumer  
92500 Rueil-Malmaison  
France

Atlinks Europe SAS (Madrid Office)  
C/ Caléndula, 93, MINIPARC III. Edif. E  
El Soto de la Moreleja  
28109 Alcobendas – Madrid  
España

Atlinks Asia Limited (Mexico Office)  
World Trade Center, Montecitorio 38, Piso 15, oficina 31  
Col. Nápoles, Del. Benito Juárez  
03810 México DF  
Mexico

Swissvoie International SA  
Rue Ancienne 53  
Carouge  
Switzerland



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# ENVIRONMENTAL MANAGEMENT SYSTEMS

Certificat FR12/695119  
Le système de management de

## Atlinks Holdings Limited

Room 1818, 18/F, Nan Fung Commercial Centre  
19 Lam Lok Street, Kowloon Bay, Kowloon  
HONG KONG

a été audité et certifié selon les exigences de  
**ISO 14001 : 2015**

Pour les activités suivantes

Design, development, marketing and sales of fixed-line and mobile telephones, video and multimedia terminals, to operators and to professional and consumer retail sales channels all around the world.

Conception, développement et distribution à travers le monde de téléphones connectés à la ligne fixe et aux réseaux mobiles, ainsi que de terminaux vidéo et multimédia destinés aux réseaux professionnels, grand public et opérateurs.

Diseño, desarrollo, marketing y ventas a nivel mundial de teléfonos conectados a líneas fijas y móviles, terminales video y multimedia destinados a las redes de distribución profesionales, gran público y operadores.

Le certificat est valable du 10 octobre 2020 au 9 octobre 2023  
Et reste valable sous réserve des audits de surveillance satisfaisants  
Version 7. Date de première certification octobre 2012

Ceci est une certification multilatérale

La liste des sites additionnels est mentionnée dans la page suivante

Autorité par

SGS ICS  
26, avenue Aristide Briand 94111 Arcueil Cedex, France  
t +33 (0) 1 41 24 97 75 f +33 (0) 1 73 01 71 29 www.sgs.com

Page 1 de 2

Certificat FR12/695119, suite

## Atlinks Holdings Limited ISO 14001 : 2015

Version 7

Sites additionnels

Atlinks Asia Limited  
Room 1818, 18/F, Nan Fung Commercial Centre  
19 Lam Lok Street, Kowloon Bay, Kowloon  
Hong Kong

Atlinks Europe SAS  
147 Avenue Paul Doumer  
92500 Rueil-Malmaison  
France



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# OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT SYSTEMS

Certificat FR14/18906  
Le système de management de

## Atlinks Holdings Limited

Room 1818, 18/F, Nan Fung Commercial Centre  
19 Lam Lok Street, Kowloon Bay, Kowloon  
HONG KONG

### ISO 45001 : 2018

Pour les activités suivantes

Design, development, marketing and sales of fixed-line and mobile telephones, video and multimedia terminals, to operators and to professional and consumer retail sales channels all around the world.

Conception, développement et distribution à travers le monde de téléphones connectés à la ligne fixe et aux réseaux mobiles, ainsi que de terminaux vidéo et multimédia destinés aux réseaux professionnels, grand public et opérateurs.

Diseño, desarrollo, marketing y ventas a nivel mundial de teléfonos conectados a líneas fijas y móviles, terminales video y multimedia destinados a las redes de distribución profesionales, gran público y operadores.

Ce certificat est valable du 10 octobre 2020 au 9 octobre 2023 et reste valable sous réserve des audits de surveillance satisfaisants

Version 5. Date de première certification octobre 2020

Cet organisme était certifié OHSAS 18001 depuis le 6 août 2014

Ceci est une certification multilingue

La liste des sites additionnels est mentionnée dans la page suivante

Autorisé par

SGS ICS  
29, avenue Aristide Briand 94111 Arcueil Cedex France  
t +33 (0) 1 41 24 87 75 f +33 (0) 1 73 91 71 29 [www.sgs.com](http://www.sgs.com)

Page 1 de 2

Certificat FR14/18906, suite

## Atlinks Holdings Limited

### ISO 45001 : 2018

Version 5

Sites additionnels

Atlinks Asia Limited  
Room 1818, 18/F, Nan Fung Commercial Centre  
19 Lam Lok Street, Kowloon Bay, Kowloon,  
Hong Kong

Atlinks Europe SAS  
147 Avenue Paul Doumer  
92500 Rueil-Malmaison  
France



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# CSR EVALUATION

ecovadis

**ATLINKS HOLDINGS LTD (GROUP)**

has been awarded a

**Platinum medal**

as a recognition of their EcoVadis Rating

- DECEMBER 2021 -



You are receiving this score/medal based on the disclosed information and news resources available to EcoVadis at the time of assessment. Should any information or circumstances change materially during the period of the scorecard/medal validity, EcoVadis reserves the right to place the business' scorecard/medal on hold and, if considered appropriate, to re-assess and possibly issue a revised scorecard/medal.

**Valid until: December 2022**

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## 10.4 SDG Results



#	Sustainable Development Goal	#	Goal Target	Atlinks Actions	Atlinks Target	2021 Evaluation
1	No poverty					
2	Zero Hunger					
3	Good Health and Well-being	3.8	Achieve universal health coverage, including financial risk protection, access to quality essential health-care services and access to safe, effective, quality and affordable essential medicines and vaccines for all	Insurance	100% of employees with insurance	100% insurance
		3.8		Medical Checks	100% of employees medical checks as per regulations requirements.	100% are following the plan of medical checks
		3.8		Suppliers Health and Safety assessment	100% of vendors audited on H&S. Over 90% compliancy	100% audited, 94,71% compliancy
		3D	Strengthen the capacity of all countries, in particular developing countries, for early warning, risk reduction and management of national and global health risks.	Health and Safety programs	0 Accidents	0 Accidents
		3A	Strengthen the implementation of the World Health Organization Framework Convention on Tobacco Control in all countries, as appropriate.	Non smoking November campaign	1 month follow government campaign	Nov 2021 French " Non smoking Campaign"
		3.3	By 2030, end the epidemics of AIDS, tuberculosis, malaria and neglected tropical diseases and combat hepatitis, water-borne diseases and other communicable diseases.	Drivers security training and engament	100% of employees using company car signed chart and received training.	100% drivers employees signed chart Training: 100% in France, 100% in Spain
4	Quality Education	4.7	By 2030, ensure that all learners acquire the knowledge and skills needed to promote sustainable development, including, among others, through education for sustainable development and sustainable lifestyles, human rights, gender equality, promotion of a culture of peace and non-violence, global citizenship and appreciation of cultural diversity and of culture's contribution to sustainable development	Contribution to Téléthon	Donation of batteries to Screelec/Téléthon	No donation in 2021
				Training and Awareness	90% of Training plan fulfilled	Hong Kong Training plan completed France serveral trainings proposed and done
5	Gender Equality	5.1	End all forms of discrimination against all women and girls everywhere	Balance female/male age pyramid	50%/50%	51%/49%
6	Clean Water and Sanitation					
7	Affordable and clean Energy					
8	Decent work and Economic growth	8.7	Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms	Child labor	100% Compliance in audits for Child and Foreced labor	100% Compliancy
		8.7		Forced and compulsory labor	100% Compliance in audits for Child and Foreced labor	100% Compliancy
		8.7		Conflict Minerals Traceability	5 main Product manufactures questioned every 2 years	6 main manufactures questioned in 2021 Questioned
9	Industry Innovation and infrastructure			Development of an Elderly product range	2 brands product range dedicated to Elderly people. Integration in technologies.	Swissvoice and Amplicomms brands launched and running
10	Reduce Inequalities	10.2	By 2030, empower and promote the social, economic and political inclusion of all, irrespective of age, sex, disability, race, ethnicity, origin, religion or economic or other status	Non discrimination nationalities, female	Diversity	4 nationalities, half of the staff female
		10.2		Handicap	Yearly Contribution to handicap	16 h of handicap worker
		10.2		Contribution to Emmaüs	Yearly Contribution to housing and integration	No contribution in 2021, since no Salon due to pandemics
11	Sustainable cities and communities					
12	Responsible consumption and production	12.2	By 2030, achieve the sustainable management and efficient use of natural resources	Paper consumption	Reduce paper cosumption	+8% in HK and -107.5% in France
		12.2		Electricity consumption	Reduce Electricity consumption	-26% in France, +4% in Hong Kong
		12.4		Waste management at office	Reduce the waste production /less consumption	More waste in France since moving office clean up.
13	Climate Action	13.2		Tranportation	Inbound: 100% of container fulfillment, outbound: decrease the CO2 per product transported	Inbound: 98%, Outbound: +14%
		13.2	Integrate climate change measures into national policies, strategies and planning	Eco design	Over 50% of recycled carboard 100% mineral oils free ink	81% Recycled carboard 100% mineral oils free inks
		13.2		Product end of life. Recycling	Compliant with the producers plans in Europe	100% compliant
		13.2		Suppliers Environmental assessment	100% of Suppliers Audited on Environmental aspects, 90% compliancy.	100% of Suppliers Audited on Environmental aspects, 98,8% compliancy.
14	Life Below water					
15	Life on land					
16	Peace Justice and Strong Insitutions	16.7	Ensure responsive, inclusive, participatory and representative decision-making at all levels	Freedom of Association	Associations representatives	Elections in France, but not candidates in 2020
		16.7		Collective Bargain	Elected representatives - CSE in France	Regular meetings with Staff.
		16.5	Substantially reduce corruption and bribery in all their forms	Anticourruption training and tools	100% of employees/consultants/agents trained	65% Certificates of training
		16.5		Anticompetition and responsible marketing	No complains	NO complains
17	Partership for the Goals	17.16	Enhance the global partnership for sustainable development, complemented by multi-stakeholder partnerships that mobilize and share knowledge, expertise, technology and financial resources, to support the achievement of the sustainable development goals in all countries, in particular developing countries	CSR suppliers audits	100% of Suppliers Audited on CSR aspects	100% suppliers audited 97,7% compliancy

## 10.5 EMISSIONS CO2e

Based on Bilan Carbone ©. Covering France and Hong Kong offices and the operations related to Europe sales.

CO2 eq		2018		2019		2020		2021	
<b>Total Scope 1-2 3</b>	Tones CO2 eq	<b>18590.54</b>		<b>15914.08</b>	-14%	<b>15907.00</b>	0%	<b>17363.79</b>	9%
<b>Total Scope 1 - Direct</b>		<b>0</b>	0%	<b>0</b>	0%	<b>0</b>	0%	<b>0</b>	0%
<b>Total Scope 2 - Indirect</b>		<b>41.85</b>	0.23%	<b>40.06</b>	0.25%	<b>37.82</b>	0.24%	<b>18.55</b>	0.11%
<b>Total Scope 3 - Indirect</b>		<b>18548.69</b>		<b>15874.03</b>		<b>15869.19</b>		<b>17345.23</b>	
<b>Scope 3 Upstream</b>		18832.34	101.30%	16235.49	102.02%	16146.58	101.51%	17619.35	101.47%
<b>Scope 3 Downstream</b>		-283.65	-1.53%	-361.46	-2.27%	-277.39	-1.74%	-274.12	-1.58%
	kg CO2/ k€	<b>804.47</b>		<b>738.99</b>	-8%	<b>726.88</b>	-2%	<b>704.71</b>	-3%