

2019

ATLINKS

CORPORATE SOCIAL
RESPONSIBILITY

ANNUAL REPORT



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1 MANAGEMENT COMMITMENT

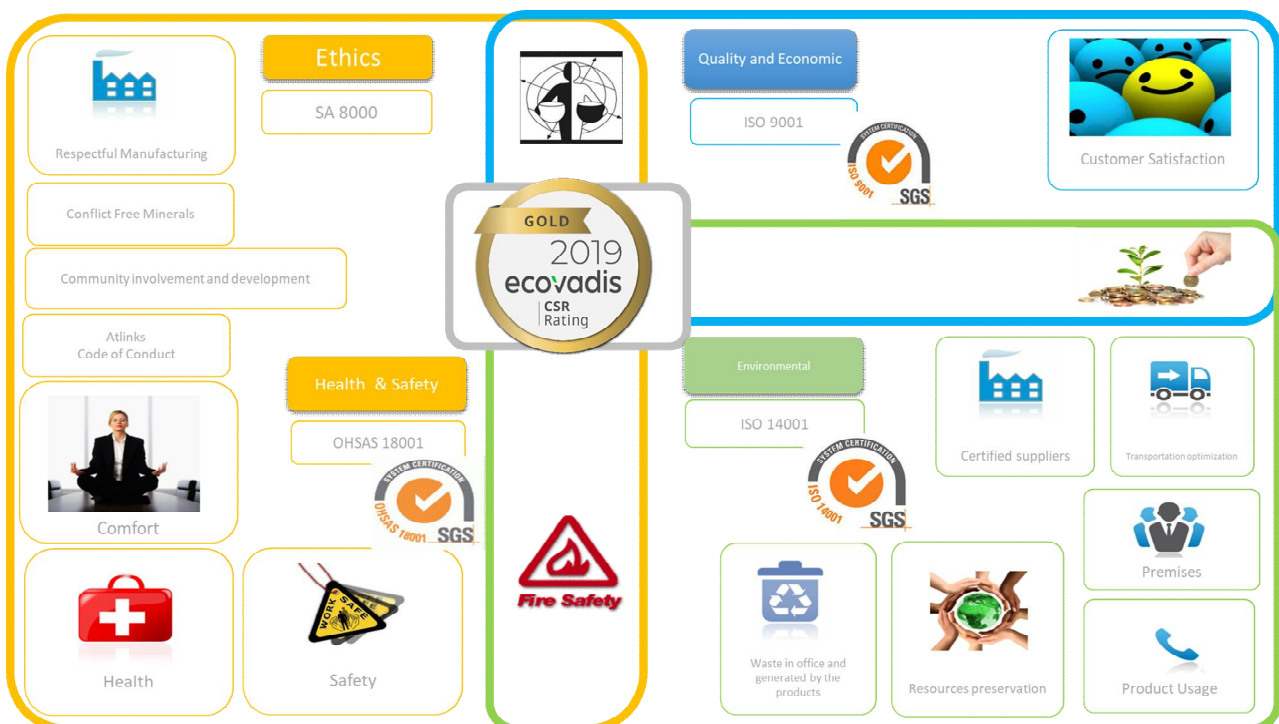
ATLINKS delivers excellence in its products, services and solutions that ensure customer value and contribute to their success. We strive to be recognized by our employees, customers, community and shareholders as a responsible organization that conducts our business in a manner that conserves the environment, 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, OHSAS 18001. We also support the 10 Principles of the United Nations Global Compact to enforce our commitment to all the stakeholders in our business.

C.H. Tong
CEO



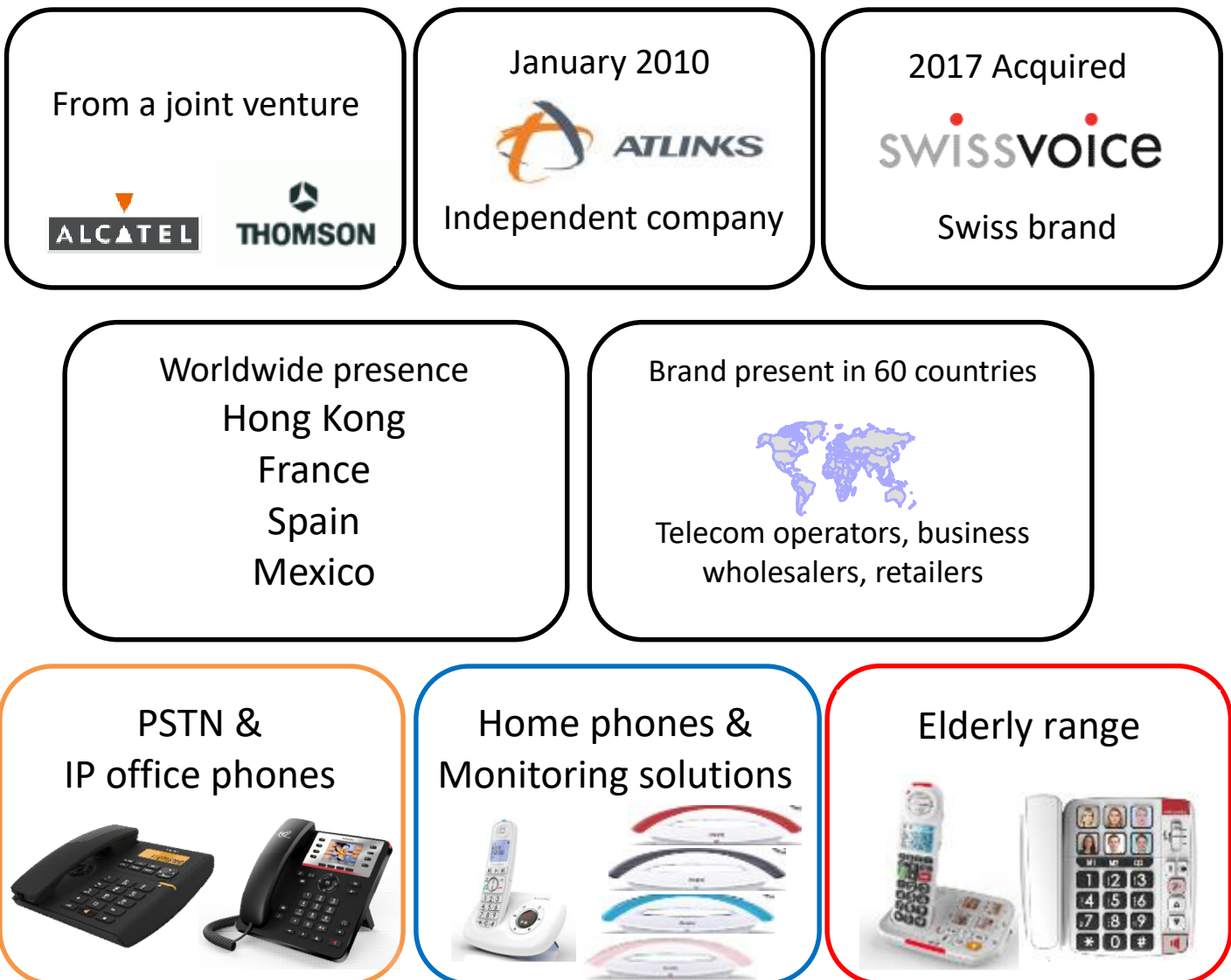
2 COMPANY PRESENTATION

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 channels all around the world.

It is a fab-less company, so it has a set of key manufactures 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 three brands: Alcatel, Swissvoice, Amplicomms, and ATLINKS. It also uses the Telco brand. It acts as distributor for products under other brands brand.



3 COMPANY STRUCTURE

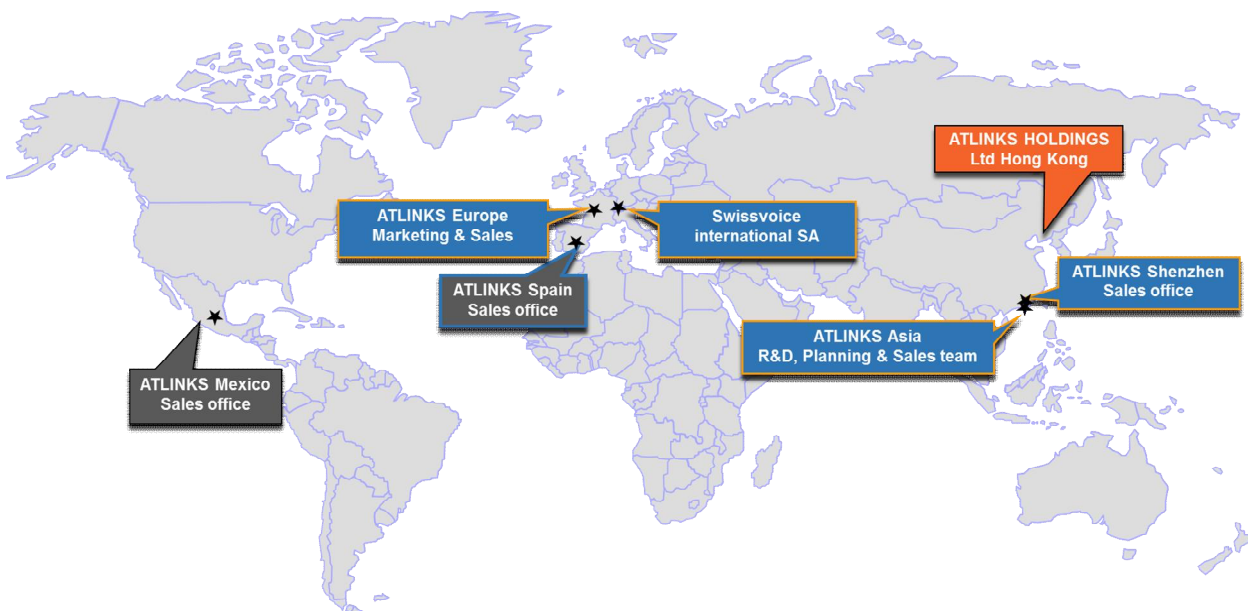
ATLINKS Holdings Ltd is a Hong Kong based company, with three subsidiaries, ATLINKS Asia Ltd, based in Hong Kong, ATLINKS Europe SAS, based in France and Swissvoice International S.A., based in Switzerland. There are three representative offices, one in Mexico which manages the commercial activity for 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.

The staff of the company repartition is as follows:

ATLINKS Asia Ltd:	22 employees
ATLINKS Europe:	15 employees
Swissvoice International:	0 employees
Spain Sales office:	3 employees
Mexico Sales office:	1 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 use the 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 located in Hong Kong, close to the product suppliers and manufacturing sites. The Europe operation is more oriented to the customers, marketing and communications.



4.1 SUSTAINABLE DEVELOPMENT: THE GLOBAL COMPACT

ATLINKS supports also the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labor, Environment and Anti-Corruption:

Human rights	Principle 1	Support and respect the protection of internationally proclaimed human rights; and	In ATLINKS operations countries we have been always be 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. Ref. <i>Suppliers Audits procedure</i> , Check list: <i>Supplier EHS and CSR check list (SA 8000 based)</i>
	Principle 2	Make sure that they are not complicit in human rights abuses	
Labor	Principle 3	Uphold the freedom of association and the effective recognition of the right to collective bargaining;	ATLINKS follows in each subsidiary (2) the rules relative to the employees association and bargain relations. Regular meetings are hold between the management and the employee's representatives to promote the communications in both senses.
	Principle 4	The elimination of all forms of forced and compulsory labor;	ATLINKS does not practice any forced or compulsory labor or the child labor at any of its subsidiaries. ATLINKS also controls the fact that its suppliers respect also those principles by auditing the suppliers against the international standards. Ref. <i>Suppliers Audits procedure</i> , Check list: <i>Supplier EHS and CSR check list (SA 8000 based)</i>
	Principle 5	The effective abolition of child labor; and	
	Principle 6	The elimination of discrimination in respect of employment and occupation.	ATLINKS does not practice any kind of discrimination: The staff at first level of reporting to the CEO is 50% female/male We do have 6 nationalities in our subsidiaries
Environment	Principle 7	Support a precautionary approach to environmental challenges;	We do follow an environmentally friendly global approach on the company by implementing and continually improve our Environmental management system in a worldwide basis. We also encourage our suppliers to follow the approach and we audit them against the environmental standards to assure their compliancy. Ref. <i>Suppliers Audits procedure</i> , Check list: <i>Supplier EHS and CSR check list Vendors Certificates ISO 14001</i>
	Principle 8	Undertake initiatives to promote greater environmental responsibility; and	

	Principle 9	Encourage the development and diffusion of Environmentally friendly technologies.	
Anti-corruption	Principle 10	Work against corruption in all its forms, including extortion and bribery.	<p>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.</p> <p>Ref. Code of Conduct, Whistle blowing procedure</p> <p>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. Ref.: External Financial Audits</p> <p>ATLINKS has required to all the employees and consultants representing the company, to follow the training "The fight Against corruption" delivered by the United Nations.</p>

5 LABOR PRACTICES AND DECENT WORK

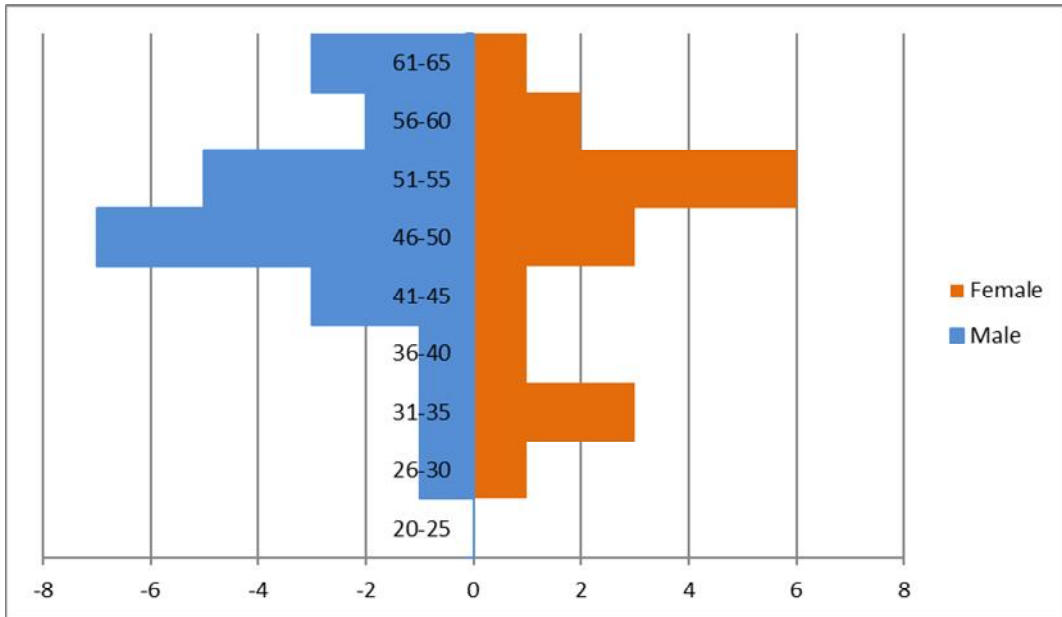
In ATLINKS operations countries we have been always respectful with the local laws and regulations which comply with the respect of the Human rights. We also have requested to our suppliers to be compliant with it and we make audits to all of them to ensure the compliancy.

5.1 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.



5.2 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.

5.3 CONTRACT OF PROGRESS. LABOR /MANAGEMENT RELATIONS

The contract of Progress (COP) is the document where the management and the employees fix the objectives for the year. There are individual and team objectives. Those are reviewed in a year basis in meeting staff manager.

It is also the moment where the competences and training can be reviewed.

100% of the employees are covered by this process.

Result: an evaluation is done per year with a “mark” average is within the targets. 2019 only the Hong Kong team has done this year. France is in a transition period.

5.4 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 all entities

97% of the staff in Hong Kong and 80% of the staff in Europe followed the Sustainable development training and awareness along the years.

5.5 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.

- Staff has been trained to the fire risk, by performing drills and the usage of fire extinguishers (2 sites, 90% of staff)
- First Aid Kit and first aid training (2 sites, 90% of staff)
- Driving safe chart published and sign by the company car drivers (100% of company drivers).
- As set of videos to recall the traffic rules has been provided to French staff, with a quiz test (half of the staff completed)
- Office exercising guidance (2 sites, 90% of staff)
- Ergonomic assessment on the use of computer and screen. (1 site, 51% of staff)
- E-mail management guidance for the stress reduction (100% of staff)
- Anti-smoking campaign in the French subsidiary in November.

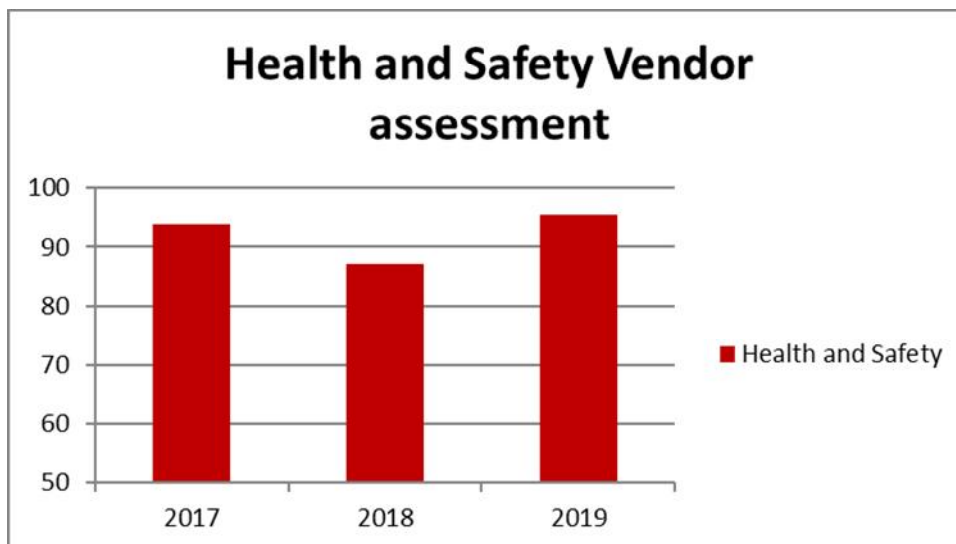
Results: ATLINKS has 0 accidents in 2019.

5.6 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 % of active vendors audited. New vendors have been introduced with the new brands and they need to improve. Mainstream vendors are 100% compliant.



6 HUMAN RIGHTS

6.1 NON-DISCRIMINATION

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

Hong Kong: 3 nationalities (13% foreigners)
France: 2 nationalities (5% foreigners)
Spain: 2 nationalities (33% 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 51% and female 49%).

6.2 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 **2019** we have had the equivalence to **0,08061** Units (**full time – handicapped person**).

6.3 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, 47% of the staff)

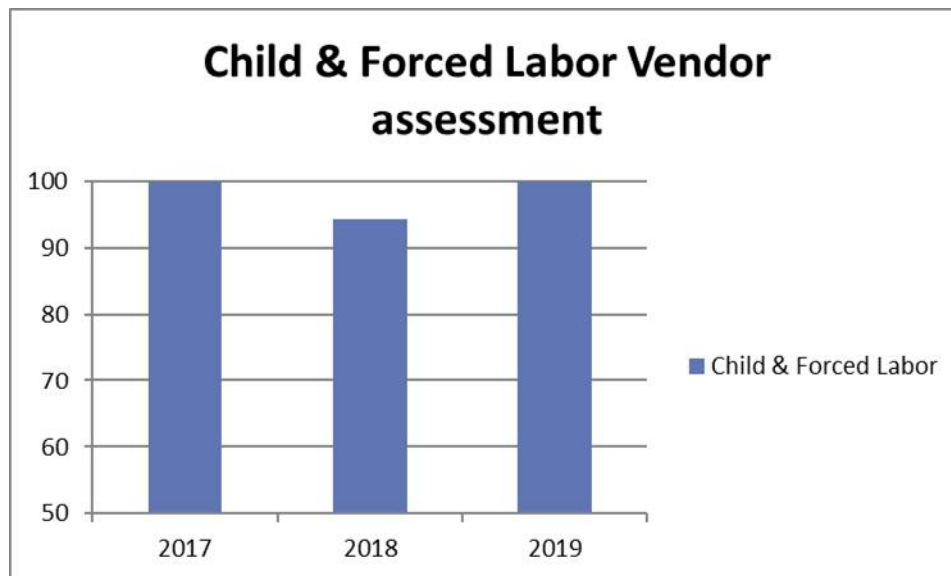
Elections are organized as per the local regulations (France, 43% of the staff)

6.4 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 % of active vendors audited. New vendors have been introduced with the new brands and they need to improve. Mainstream vendors are 100% compliant.

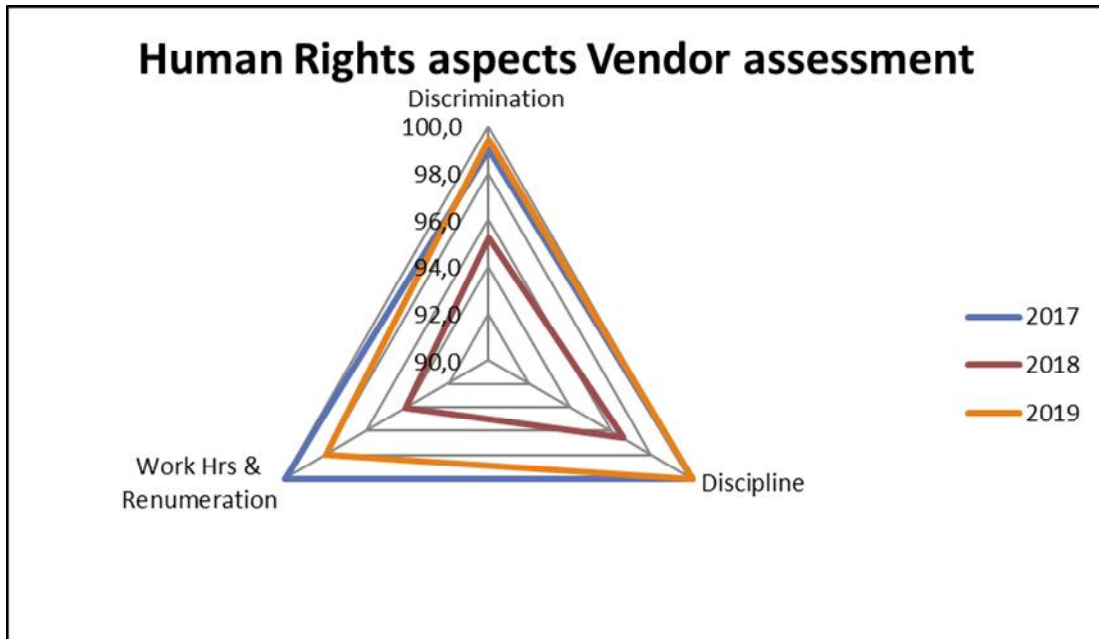


6.5 SUPPLIER HUMAN RIGHTS ASSESSMENT

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.

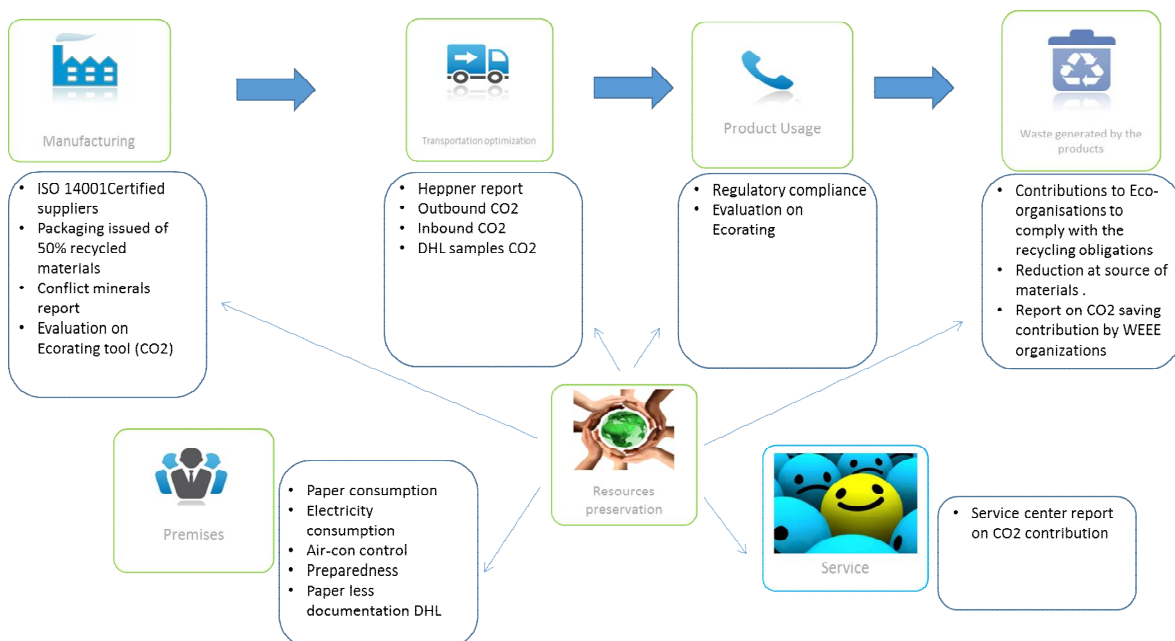
Result: 100 % of active vendors audited. New vendors have been introduced with the new brands and they need to improve. Mainstream vendors are 100% compliant.



7 ENVIRONMENT

7.1 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), waste management. All those actions are driven within the respect of all applicable laws and regulations.



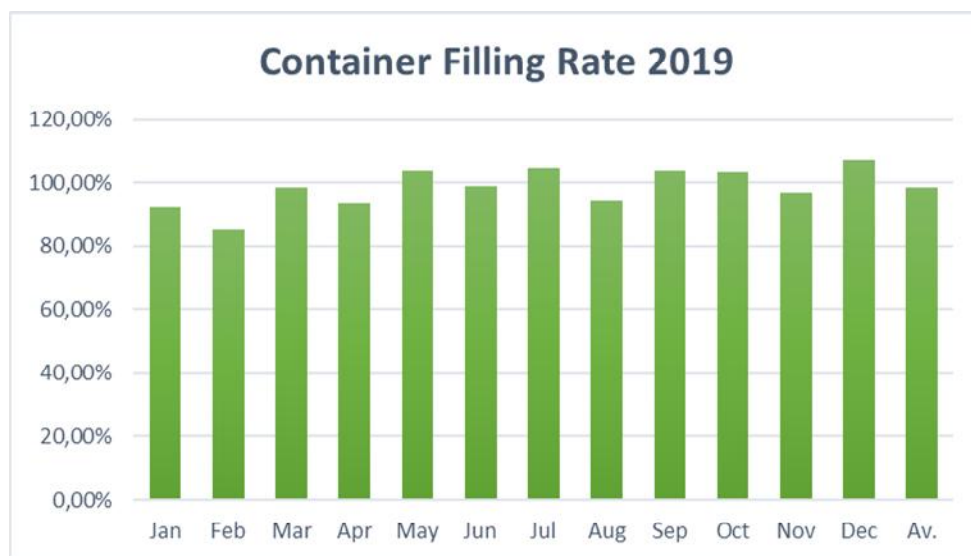
7.2 TRANSPORTATION

Transportation is one of the main Environmental impacts ATLINKS has in its operations. Since many years, we try to avoid the most polluting transportation (air) and we concentrate in the sea transportation for the inbound transport.

One of our environmental programs has been to 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.

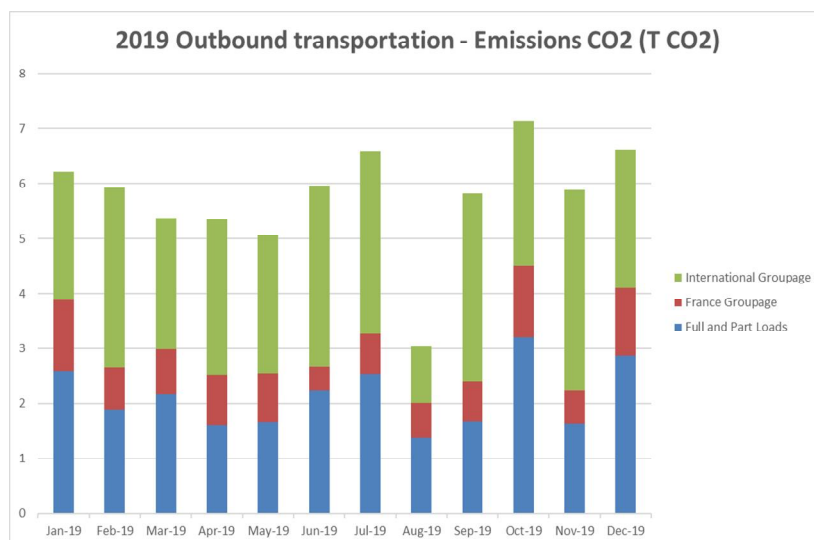
Result:

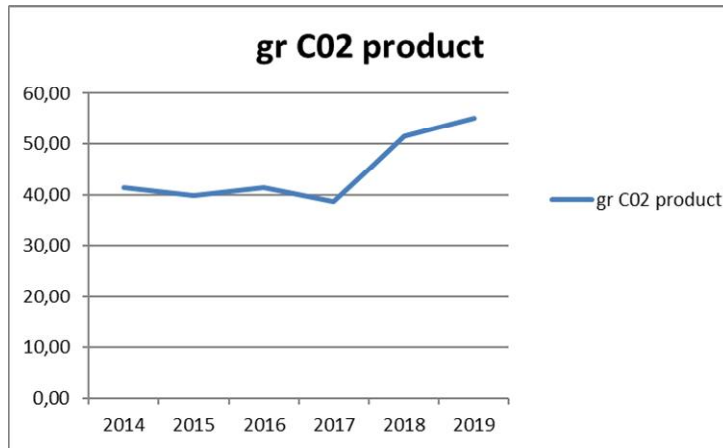
We have average rating of fulfillment over 98%



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 3rd party is an essential collaborator to support this action.

Results: Total 69 T CO2e



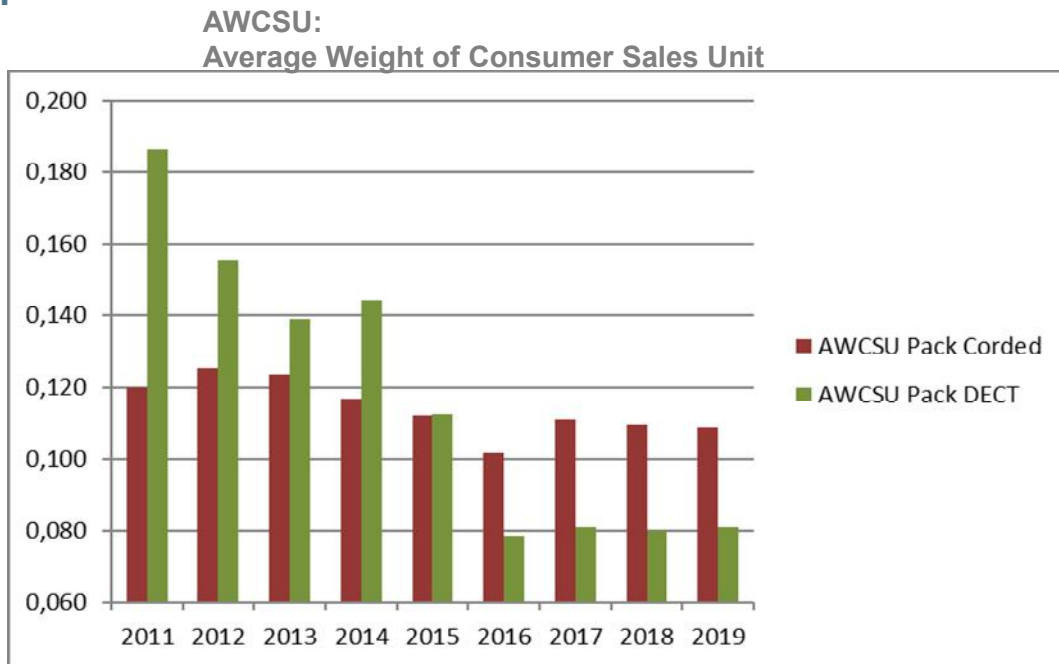


7.3 ECO-DESIGN

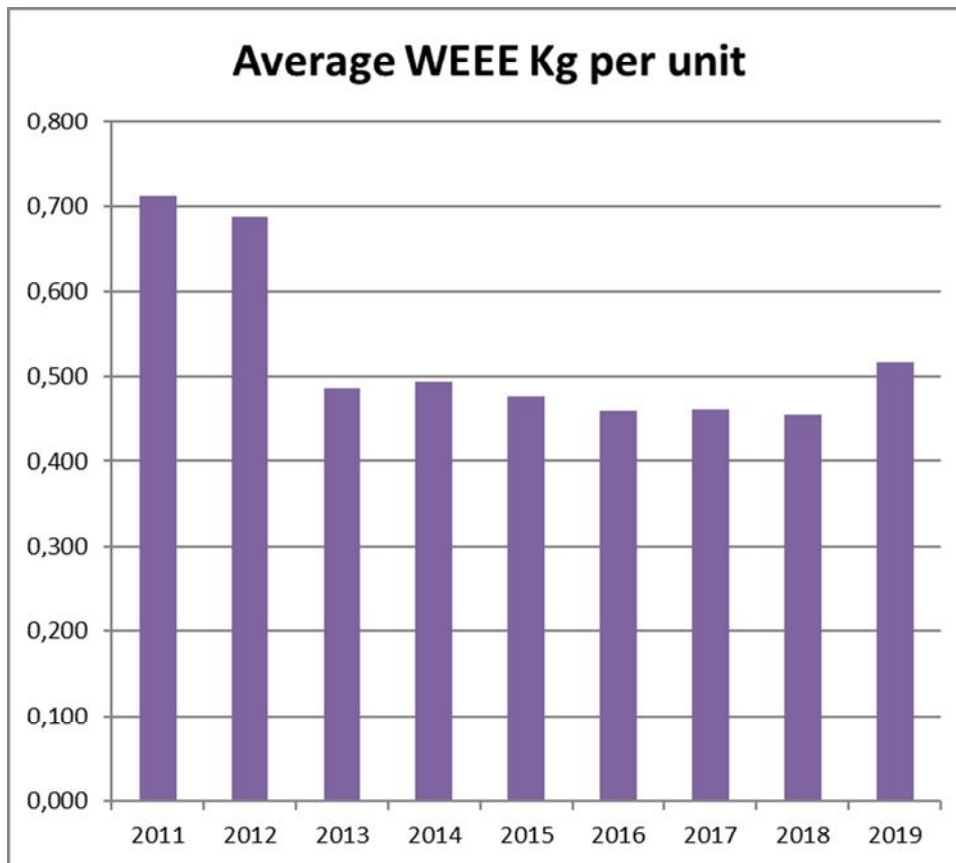
We have put in place several programs along the years:

- EuP regulation to reduce the product consumption in its life (all products compliant)
- Reduction of the packaging and user's guide, size and weight for resources preservation and transportation optimization
- Reduction of the products weight (less material used)

Results:



Corded and Cordless kept the weight, meaning that we have reached the limit of small packaging.



Slightly increase due to bigger product dedicated to the elderly.

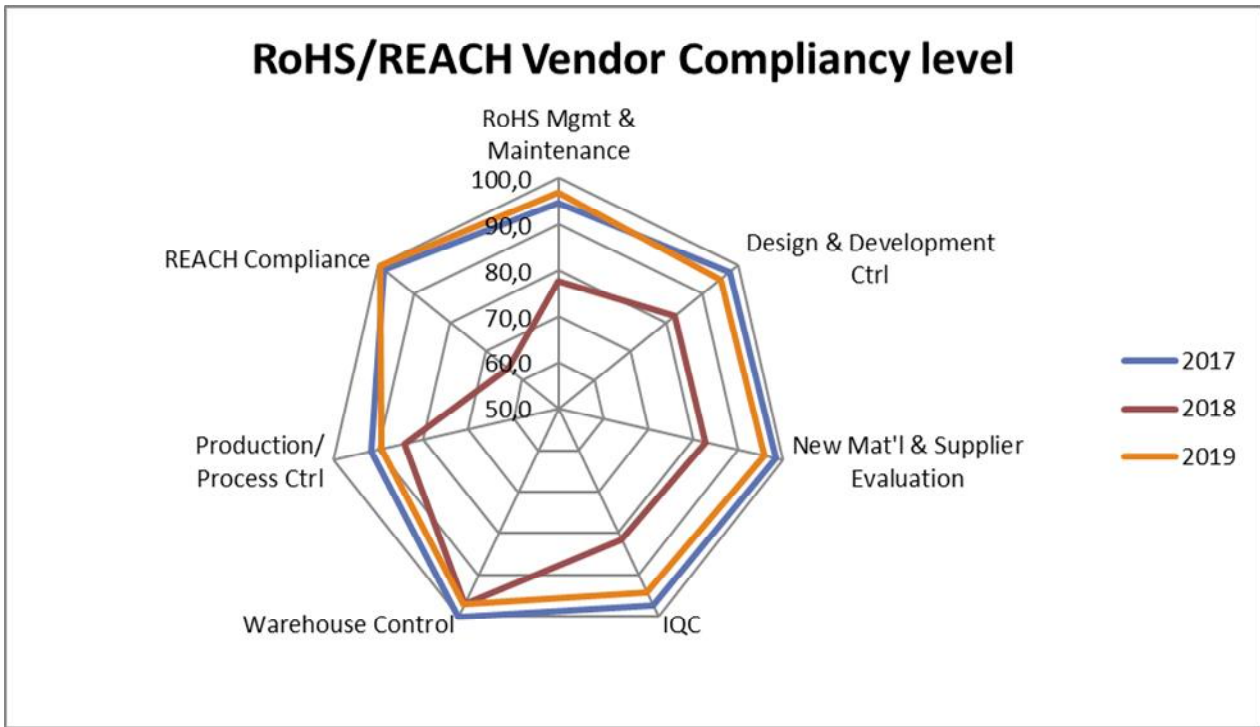
7.4 CHEMICALS MANAGEMENT

ATLINKS follows the regulations in force regarding the restriction of use of certain substances, and make sure that the products complies 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 also 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: 100 % of active vendors audited. Mainstream vendors are 100% compliant.



7.5 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

- Packaging
- WEEE
- Batteries

We declare the units 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 programs to reduce those wastes.

	FRANCE	SPAIN	ITALY	GERMANY	UK
WEEE					
BATTERIES					
PACKAGING					

We also 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.

Info tri-point:



And Triman:

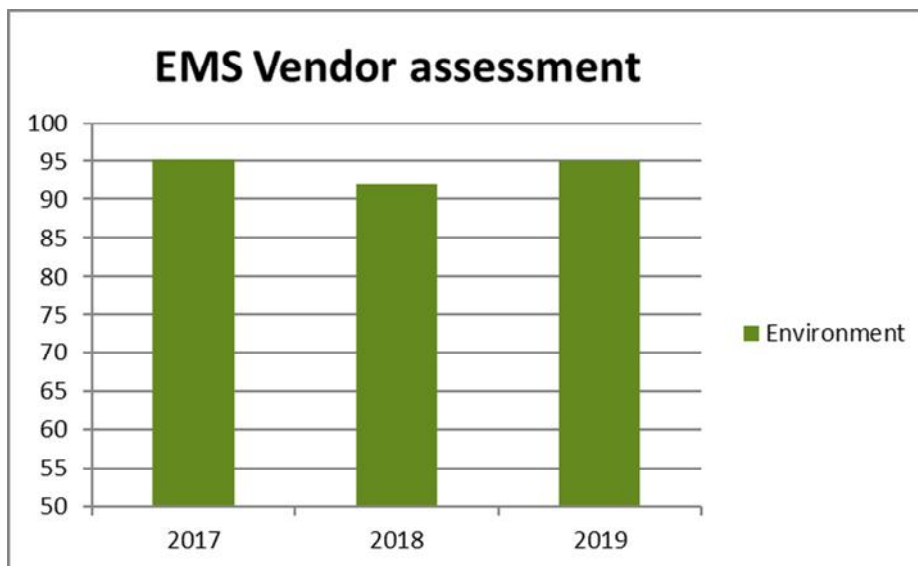


7.6 SUPPLIERS ENVIRONMENTAL ASSESSMENT

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 the active vendors audited.

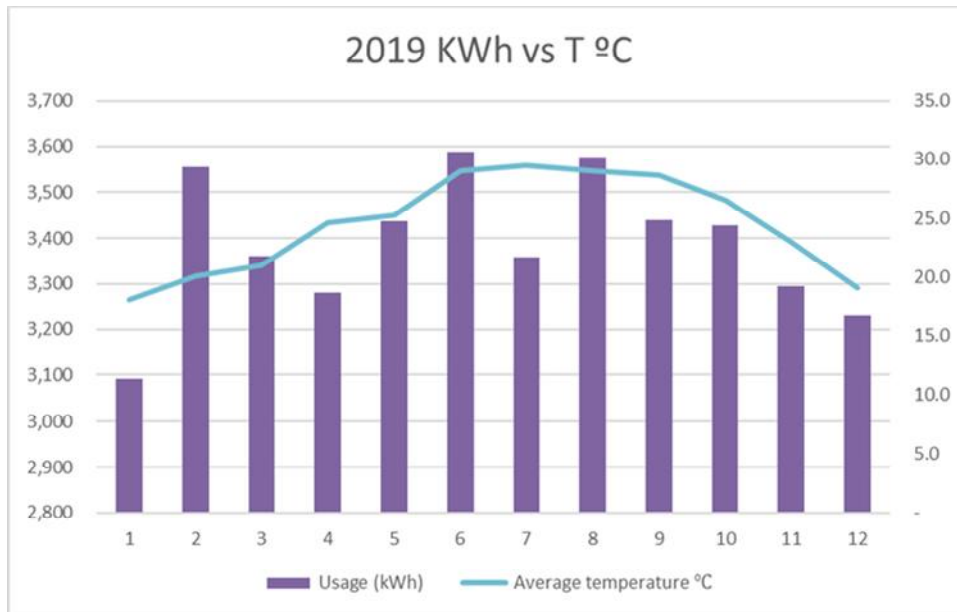


7.7 ATLINKS PREMISES

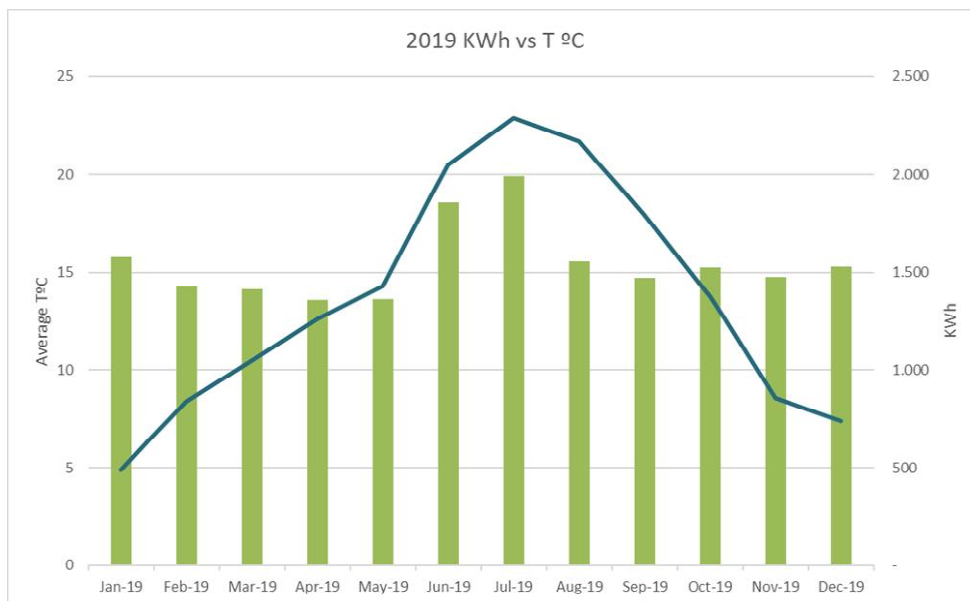
We have followed few programs:

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)
 Electricity consumption.
 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:
Electricity Hong Kong office



Electricity France office:



Usage of Paper premises:

Average daily pages consumption	2014	2015	2016	2017	2018	2019
Hong Kong	489	477	420	443	495	351
		-2,5%	-13,6%	5,2%	10,5%	-41,0%
France	279	216	231	237	250	173
		-29,2%	6,5%	2,5%	5,2%	-44,5%

DHL shipment (paper less for customs documentation)



YEAR	Shipments	Actual weight [in kg]	CO2 Emissions [in kg]	average weight per package	
2014	411	3.350	8.944		
2015	386	4.173	6.153		31%
2016	222	2.588	3.623	11,17	41%
2017	379	3.374	5.573	8,903	-54%
2018	332	2.881	4.939	8,68	-11%
2019	284	2.701	3.728	9,51	-25%

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 put 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, so as 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 provide also 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, and Health and Safety.
- 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.

The service provided by our repairing system during 2018 has avoided:

196201 kgCO₂e (Method Bilan Carbone®)

And:

-68% CO₂e per unit from 2016 to 2018

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.

8.5 COMPLIANCE

ATLINKS has a process in place to follow the different regulations, thru alerts, webinars, seminars, newsletters, and some external assessments by notify 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.

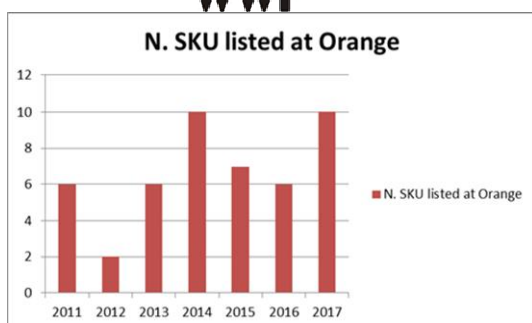
8.6 PRODUCT EXTERNALS EVALUATIONS (ECO-RATING)

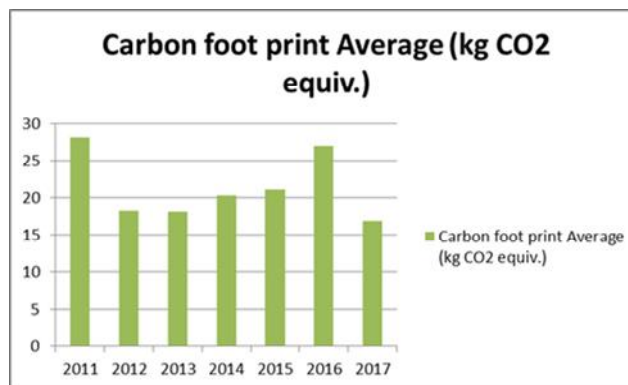
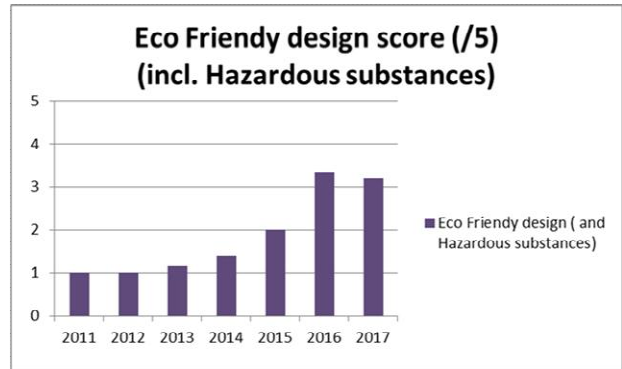
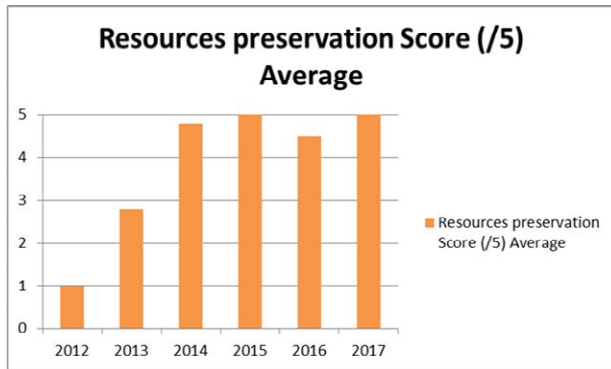
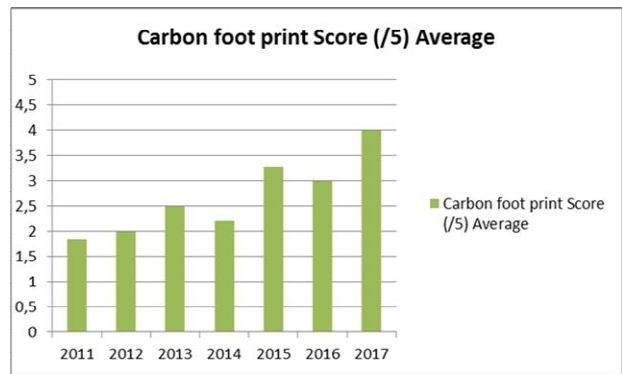
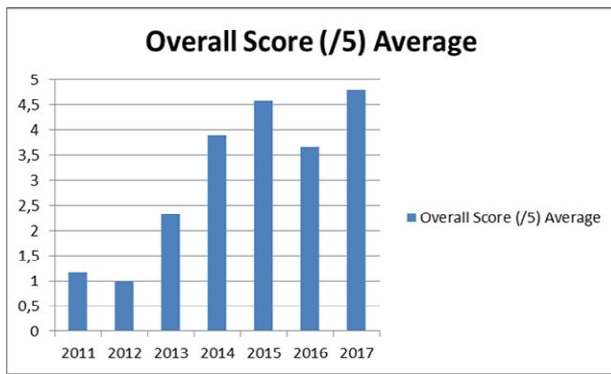
ATLINKS participates to an initiative done by one of its customers to the evaluation of the products Environmental performance called Eco-rating, with the contribution of WWF. The Environmental performance of the products is based on:

- CO2 foot print 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 since 6 years. Products sold during 2018 are same as 2018 for Orange.





8.7 CONFLICT MINERALS TRACEABILITY

ATLINKS is not a manufacturer but by means of the External evaluation of Eco-rating we have started questioning our vendors on the resource's preservation of some metals like: Gold, Silver and Tin. After, there is a calculation of the raw material depletion in person-reserve.

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

We have been asking the question since 2011, more and more we are getting feedback from our vendors.

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) on the following items:

- Plastics raw materials
- Printed Circuit Boards

- Semiconductors (chipsets)
- Soldering paste
- Capacitors (tantalum)
- Batteries

To study the following metals origin: Gold, Tin, Tungsten, Tantalum (3TG) and Cobalt-

Process:

1. Conflict Mineral Reporting Templates based on the CFSI (Conflict Free Sourcing Initiative) will be send to our vendors once every two years.
2. We have questioned main vendors
3. Collection of data and analysis
4. Record the information on our Documentation System.

Result:

We have received the completed CFSI questionnaire 100% fulfilled, for the 4 main suppliers representing 97% of our sales worldwide.

	Supplier 1	Supplier 2	Supplier 3	Supplier 4
1) Is any 3TG intentionally added or use in the products or in the production process? (*)				
Tantalum (*)	No	Yes	Yes	Yes
Tin (*)	Yes	Yes	Yes	Yes
Gold (*)	Yes	Yes	Yes	Yes
Tungsten (*)	No	Yes	Yes	Yes
2) Does any 3TG remain in the product? (*)				
Tantalum (*)	No	Yes	Yes	Yes
Tin (*)	Yes	Yes	Yes	Yes
Gold (*)	Yes	Yes	Yes	No
Tungsten (*)	No	Yes	Yes	Yes
3) Do any of the smelters in your supply chain source the 3TG from the covered countries? (*)				
Tantalum	No	Yes	No	No
Tin (*)	Yes	Yes	No	No
Gold (*)	Yes	Yes	No	No
Tungsten	No	Yes	No	No
4) Does 100 percent of the 3TG (necessary to the functionality or production of your products) originate from recycled or scrap sources? (*)				
Tantalum	No	No	No	No
Tin (*)	No	No	No	No
Gold (*)	No	No	No	No
Tungsten	No	No	No	No
5) What percentage of relevant suppliers have provided a response to your supply chain survey? (*)				
Tantalum	100%	100%	100%	Geater than 75%
Tin (*)	100%	100%	100%	Geater than 75%
Gold (*)	100%	100%	100%	Geater than 75%
Tungsten	100%	100%	100%	Geater than 75%
6) Have you identified all the smelters supplying the 3TG to your supply chain? (*)				
Tantalum	Yes	Yes	Yes	No
Tin (*)	Yes	Yes	Yes	No
Gold (*)	Yes	Yes	Yes	Yes
Tungsten	Yes	Yes	Yes	No
7) Has all applicable smelter information received by your company been reported in this declaration? (*)				
Tantalum	Yes	Yes	Yes	Yes
Tin (*)	Yes	Yes	Yes	Yes
Gold (*)	Yes	Yes	Yes	Yes
Tungsten	Yes	Yes	Yes	Yes
Questions Company related				
A. Have you established a conflict minerals sourcing policy? (*)	Yes	Yes	Yes	Yes
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.) (*)	No	No	Yes	No
C. Do you require your direct suppliers to be DRC conflict-free? (*)	Yes	Yes	Yes	Yes
D. 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? (*)	No	Yes	Yes	Yes
E. Have you implemented due diligence measures for conflict-free sourcing? (*)	No	Yes	Yes	Yes
F. Does your company conduct Conflict Minerals survey(s) of your relevant supplier(s)?(*)	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)
G. Do you revise due diligence information received from your suppliers against your company's expectations? (*)	Yes	Yes	Yes	Yes
H. Does your review process include corrective action management? (*)	Yes	Yes	Yes	Yes
I. Is your company required to file an annual conflict minerals disclosure with the SEC? (*)	No	No	Yes	No

9 SOCIETY

9.1 COMMUNITY INVOLVEMENT AND DEVELOPMENT

During 2017 we have continued to collaborate with local associations to promote the development

JUNE 2019: Emmaüs

ATLINKS Europe made a donation of over 119 phones in perfect working conditions to be sold in the "solidarity day sales" organized by Emmaüs in Paris.

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.



OCTOBER TO DECEMBER 2019: Téléthon

In collaboration with Screelec, we participate at a special collection of batteries in our premises for giving a donation to the Téléthon.

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.



NOVEMBER 2019 WITHOUT SMOKING

French campaign to fight against the smoking habit. 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-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.

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.

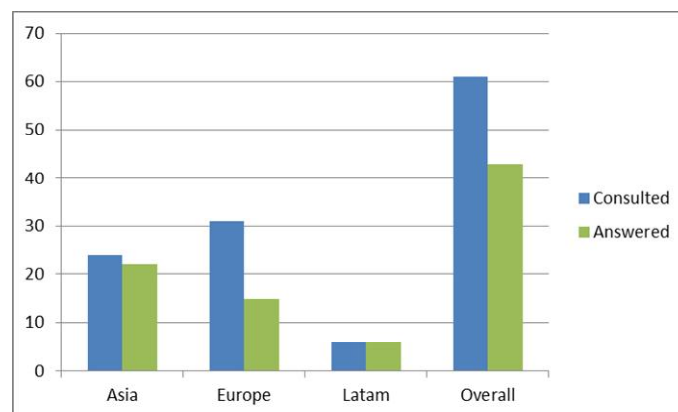
ATLINKS has also a whistle blowing procedure to received input form the stakeholders.

Result:

0 reports on corruption among the employees or any other stakeholder

Training spread worldwide to staff and consultants, over 70% of people is trained. All priority staff has been trained in 2016 and 2017.

2 New staff joined in Hong Kong, already done the training.



9.3 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.

9.4 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.

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).

Our main partner has fully certified the 4 Management Systems.

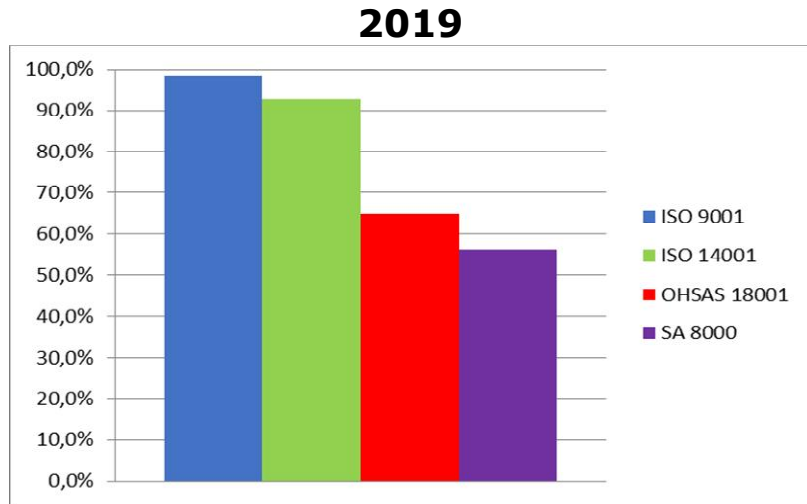
The selection and Evaluation is based in many criteria, and apart for most of the Quality, Financial, and Operational, we also include Corporate Social Responsibility, including: Environment, Health and Safety, and other criteria based on SA8000 standard, like, Discrimination, Child and Forced Labor, Working hours and Remuneration and Discipline.

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

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

Results:

Percentage of Purchased products Worldwide (value) coming from Certified Suppliers.



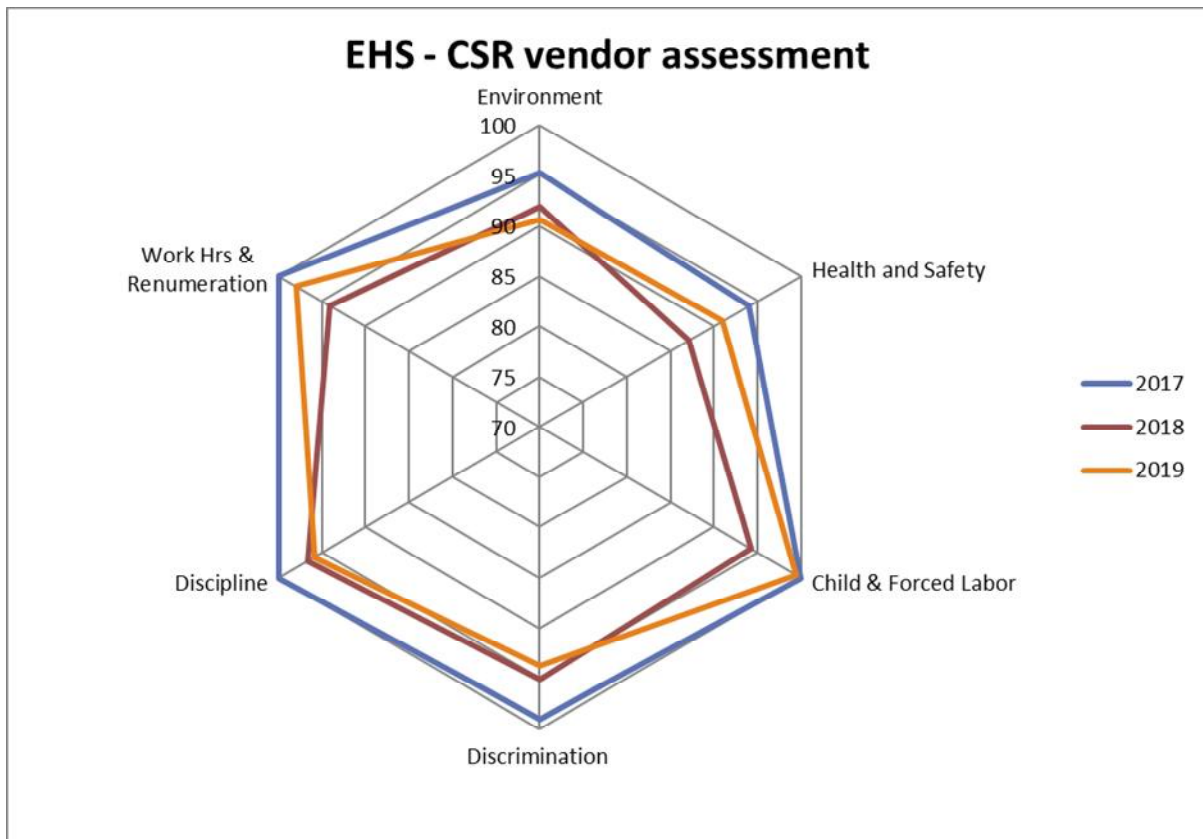
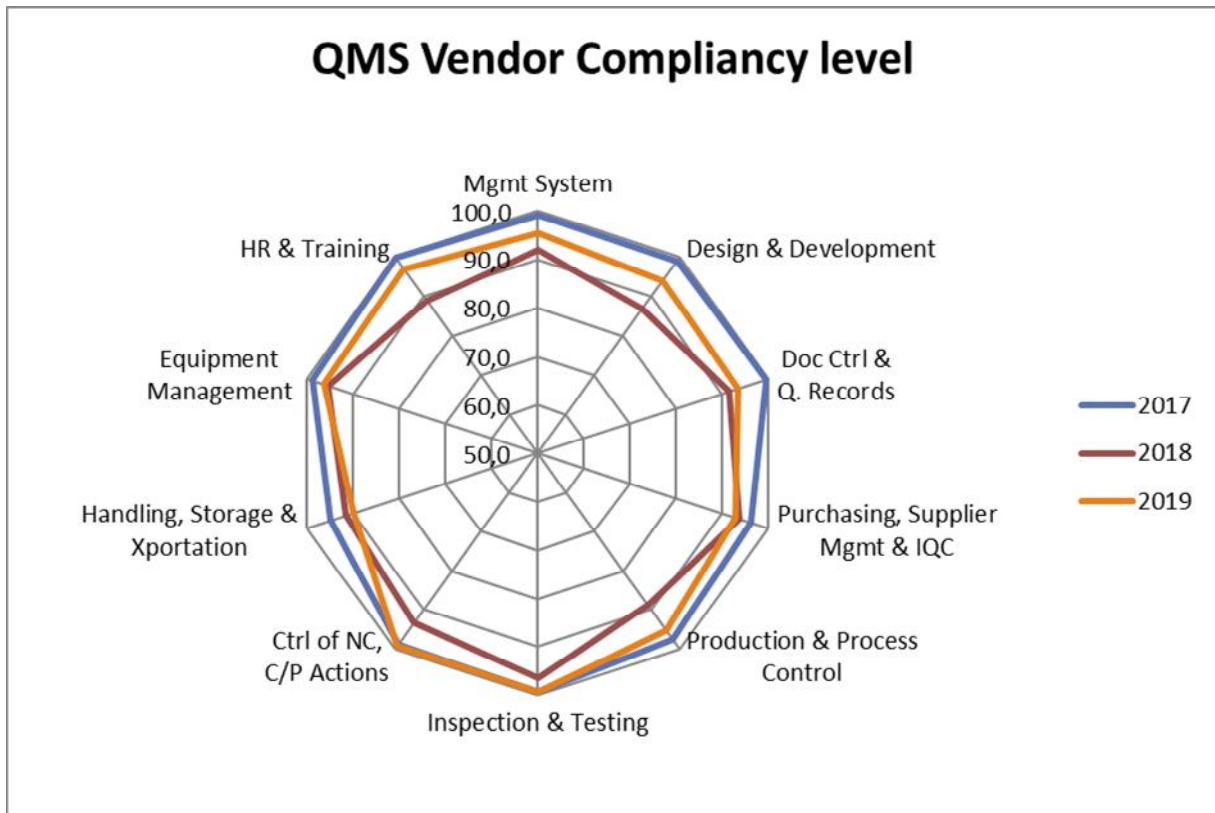
Percentage of Manufacturing Suppliers Audited

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



9.5 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 on the basis of 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 licensed brand Alcatel, and then it can be considered as a manufacturer.

This category is much more demanding than the wholesaler type of.

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

Result:

ATLINKS has confirmed its commitment to the Corporate Social Responsibility by obtaining the Gold level of recognition, and the "Advanced" level.



One **award** has been granted in 2019:

Mars 2019 :

Ecovadis: Winner of the Sustainability Leadership Best Regional Performance Award (China), for the best score in the area among all different activity sectors

<https://resources.ecovadis.com/news-press/ecovadis-announces-winners-of-2019-sustainable-procurement-leadership-awards-2>



10 RISK MANAGEMENT

ATLINKS has identified and classified the different risks related to:

- Business activity
- Environment
- Health and Safety
- Anti-bribery

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 on the following chart:

Risk matrix	LIKELIHOOD				
	Rare The event will only occur in exceptional circumstances	Unlikely The event is not likely to occur in a year	Possible The event may occur within a year	Likely The event is likely to occur within a year	Almost Certain The event is almost certain to occur within a year
Catastrophic (lost of significant business, margin)	High Risk	High Risk	High Risk	High Risk	High Risk
Major (Lost of business, margin, etc)	Low Risk	Moderate Risk	Significant Risk	High Risk	High Risk
Moderate (Lost time)	Low Risk	Low Risk	Moderate Risk	Significant Risk	High Risk
Minor (Minor consequence)	Low Risk	Low Risk	Low Risk	Moderate Risk	Significant Risk
Minimal little impact	Low Risk	Low Risk	Low Risk	Low Risk	Moderate Risk

High Risk	Significant Risk	Moderate Risk	Low Risk
Immediate action required	✓ Action required as soon as possible	Action required within 1-3 months	Monitor the hazard Minimal action

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

Weight index	1	2	3	4
Frequency-Probability	Exceptional (at least once a year)	Rare (At least once a month)	Occasional (At least once a week)	Systematic (everyday)
Gravity	Negligible Little impact on image Impacts non mesurables sur l'environnement	Marginal Image damaged Quick control on environmental effects	Critical Lost of image important environmental effects but reversible	Catastrophic Important image lost Irreversible environmental effects
Control	Systematic detection (<day) Existing procedure and applied correctly Non control for the site	Quick detection (<week) probable, Non accurate procedures or controls	Possible detection but difficult detection non sufficient or not adapted procedures	Non existant non existant data or procedures
[Environment RISK = Frequency * Gravity * Control] [N=normal Conditions / T= Depleted conditions / A= Accidental conditions]				
RIE	Importance	Signification		
Between 1 and 10	Low	EA non priority, do not need immediate intervention		
Between 11 and 20	Medium	Taking this EA into account will have positives effects for the environment, but not a priority		
Between 21 and 50	Significant	The EA needs to be taken into account for programming CA		
Above 50	Serius	EA priority		

For the **Health and safety** the risks are also evaluated on the Risks assessment.

CONSEQUENCE	Rare The event will only occur in exceptional circumstances	Unlikely The event is not likely to occur in a year	Possible The event may occur within a year	Likely The event is likely to occur within a year	Almost Certain The event is almost certain to occur within a year
Catastrophic (Accidental death / serious injury)	High Risk	High Risk	High Risk	High Risk	High Risk
Major (Serious injury)	Low Risk	Moderate Risk	Significant Risk	High Risk	High Risk
Moderate (Lost time due to workplace injury)	Low Risk	Low Risk	Moderate Risk	Significant Risk	High Risk
Minor (Minor workplace injury – no lost time)	Low Risk	Low Risk	Low Risk	Moderate Risk	Significant Risk
Minimal (No injury)	Low Risk	Low Risk	Low Risk	Low Risk	Moderate Risk

High Risk		Significant Risk		Moderate Risk		Low Risk	
Immediate action required	√	Action required as soon as possible		Action required within 1-3 months		Monitor the hazard Minimal action	

The **Anti-bribery** assessment is done based on the following chart:

Risk matrix	LIKELIHOOD			
	Rare The event will only occur in exceptional circumstances	Unlikely The event is not likely to occur in a year	Possible The event may occur within a year	Likely The event is likely to occur within a year
Major	High Risk	High Risk	High Risk	High Risk
Moderate	Moderate Risk	Significant Risk	Significant Risk	High Risk
Minor	Low Risk	Moderate Risk	Significant Risk	High Risk
Minimal	Low Risk	Low Risk	Moderate Risk	High Risk

High Risk	Significant Risk	Moderate Risk	Low Risk
Stop business activity	Action required as soon as possible	Action required within 1-3 months	Monitor the risk Minimal action

11 ANNEXES

11.1 COMPANY POLICY



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:

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

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_VW_002_CH_V9_SEPTEMBER 2019

11.2 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

11.3 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 video y multimedia destinados a las redes de distribución profesionales, gran público y operadores.

Ce certificat est valable du 20 septembre 2019 au 9 octobre 2020

Et reste valable sous réserve des audits de surveillance satisfaisants

Version 7. Date de première certification octobre 2011

Ceci est une certification multisite

La liste des sites additionnels est mentionnée dans la page suivante

Autorisé par



SGS ICS
79, avenue André Beland 94111 Aéroport Cedex France
t +33 (0)1 41 24 27 75 F +33 (0)1 73 01 71 29 www.sgs.com

Page 1 de 2



Certificat FR11/00604, suite

Atlinks Holdings Limited

ISO 9001 : 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

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, Montecilio 38, Piso 15, oficina 31
Col. Nápoles, Del. Benito Juárez
03810 México DF
Mexico

Swissvoice 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 20 septembre 2019 au 9 octobre 2020 et reste valable sous réserve des audits de surveillance satisfaisants Version 6. Date de première certification octobre 2012

Ceci est une certification multiscite

La liste des sites additionnels est mentionnée dans la page suivante



Atlinks Holdings Limited

ISO 14001 : 2015

Version 6

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



Autorisé par

SGS ICS
29, avenue Aristide Briand 94111 Arcueil Cedex, France
t+33 (0)1 47 34 87 75 f+33 (0)1 73 01 71 29 www.sgs.com



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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

a été audité et certifié selon les exigences de

OHSAS 18001 : 2007

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 20 septembre 2019 au 9 octobre 2020 et reste valable sous réserve des audits de surveillance satisfaisants

Version 4. Date de première certification août 2014

Ceci est une certification multisite

La liste des sites additionnels est mentionnée dans la page suivante



Certificat FR14/18906, suite

Atlinks Holdings Limited

OHSAS 18001 : 2007

Version 4

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



Autorisé par

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

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CSR EVALUATION



ATLINKS HOLDINGS LTD (GROUP)

has been awarded a
Gold medal

as a recognition of their EcoVadis CSR (Corporate Social Responsibility) Rating

- OCTOBER 2019 -



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: October 2020

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