



# Promotion Group



Promotion SpA



BEAUREGARD MANUFACTURE SA



BEAUREGARD SAS



B&C S.A.

## 2023 SUSTAINABILITY REPORT

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# Letter from the CEO

The year 2023 was a year of strategic importance for our company. Despite the challenges related to macroeconomic complexities and market volatility, the watchmaking sector recorded exceptional results, with significantly more positive numbers than in previous years. In this context, our team worked with commitment and determination, taking inspiration from our long history and the values that continue to guide us towards the future. These values not only strengthen our identity, but also allow us to build an organization capable of capturing the great potential of our Group. We have preserved our valuable heritage of knowledge and traditions, while at the same time constantly promoting future-oriented innovation.

A special thanks goes to our founding partners, Giovanni Rasia and Pierre Jean Marie Buise, whose vision and dedication have been the foundation of our current success. From the beginning, the founding partners have promoted innovation and quality, not only with regard to products, but also processes, focusing on “customer satisfaction”, an essential value for our Group.

Led by a passionate Management, we have embarked on a decisive path towards sustainability. We are confident that this project will allow us to achieve significant goals, while enhancing the human capital that sets our company apart.

A special thanks goes to all our Staff whose skills and passion have constantly contributed to ensuring and promoting this fundamental evolution.

Today, our strategy is clear and the Group is united by a shared purpose and shared values. We will continue to work with vision, dedication and determination, aspiring to be a point of reference for generations to come.

**Angelo Manuel Rasia**  
Promotion Group CEO





# *Letter from the Group's General Manager*

During 2023, our target market reacted positively, allowing us to seize significant opportunities. However, as emphasized above by our CEO, we are aware that these favourable conditions may not repeat in the future.

This leads us to be even more attentive and proactive, continuing to innovate and consolidate our position in our business sector, regardless of how external dynamics may develop. The company has demonstrated its ability to adapt and its resilience, strengthening its commitment to sustainability, now an integral part of its corporate culture and a constant guide in operational decisions.

A relevant aspect of this path is the generational transition, considered a strategic lever to guarantee the continuity and long-term success of the Group.

This process allows us to innovate while maintaining a balance between tradition and innovation, in line with our historic motto: "Promotion, your solution!". Balancing these two aspects is essential to address the challenges of a constantly evolving market.

By means of this first report, the company will be launching a structured reporting process of its impacts in the ESG (Environmental, Social, Governance) field, with the aim of ensuring clear and transparent disclosures to all stakeholders. The aim is to consolidate the role of Promotion Group as a responsible company, capable of combining economic results and attention to sustainability, thereby creating lasting value for the community and the environment.

A further thank-you goes to all the people who have contributed to the achievement of this goal. This result represents a stimulus to continue the development of innovative and sustainable solutions with determination.

**Maurizio De Lorenzo**

Promotion Group General Manager

# *Scope of the Sustainability Report*

The Promotion Group's Sustainability Report summarizes the results obtained by the company in the economic, social and environmental fields during the year and outlines the improvement targets that it wishes to achieve in the future. The material aspects for Promotion Group, i.e. those that significantly influence the company's activities and the expectations of stakeholders, have been identified through an in-depth analysis. These aspects include:

- **Customer and employee satisfaction:** Promotion Group is committed to providing excellent services to its customers and to creating a positive and stimulating working environment for its employees, based on trust, respect, training and well-being.
- **Reduction of the environmental impact:** The company's commitment concerns the reduction of its consumption of natural and energy resources, prevention and management of waste, minimization of greenhouse gas emissions and adoption of environmentally friendly solutions when carrying out its activities.
- **Development and promotion of the local community:** Promotion Group acts as a social player by participating in initiatives for solidarity, culture and sports for the benefit of the community.

The publication of the Sustainability Report helps the company to measure, understand and disclose its environmental, social and governance performance, set objectives and manage changes more effectively.





# *How to Read This Report*

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Guidelines Adopted  
Methodological Note  
Reporting Processes  
Scope of Analysis

# Guidelines Adopted

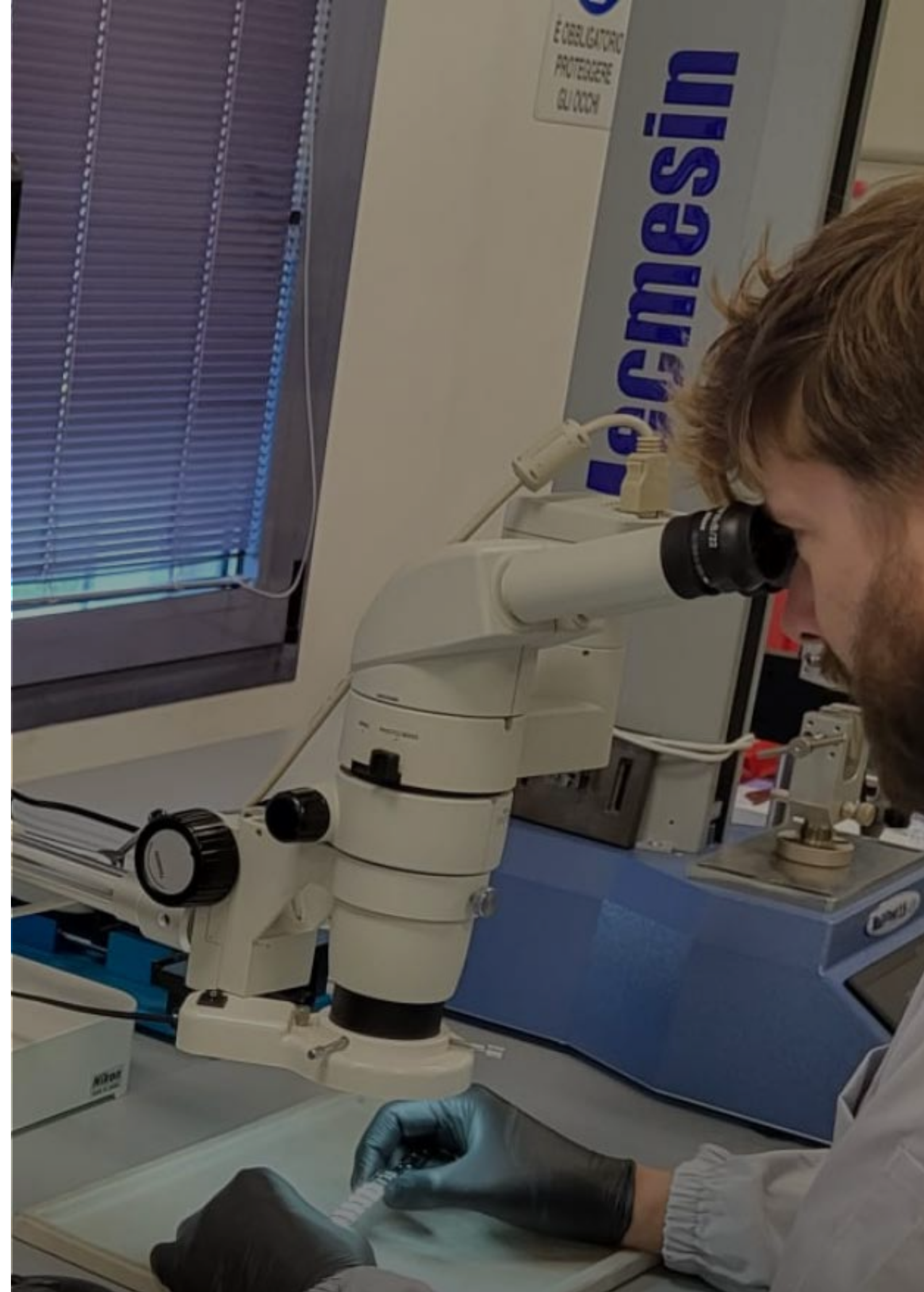
We are pleased to present our first Sustainability Report, a document that illustrates the environmental and social responsibility activities we carried out in 2023. This report reflects our commitment to managing activities responsibly and transparently by taking into account the impacts generated on people, the environment and the local community in which we operate.

This document was prepared in accordance with the GRI (Global Reporting Initiative) “Guidelines for Sustainability Reporting”, the main international framework for disclosure of the sustainable performance of organizations.

This report will be distributed at public events dedicated to sustainability, while a free digital version will be available on our website at <https://promotion-group.ch/>.

For any questions, suggestions or requests for further information, you may contact us at the following email address: [promotion@promotion-group.it](mailto:promotion@promotion-group.it).

We will be glad to receive your feedback and discuss sustainability issues with you.

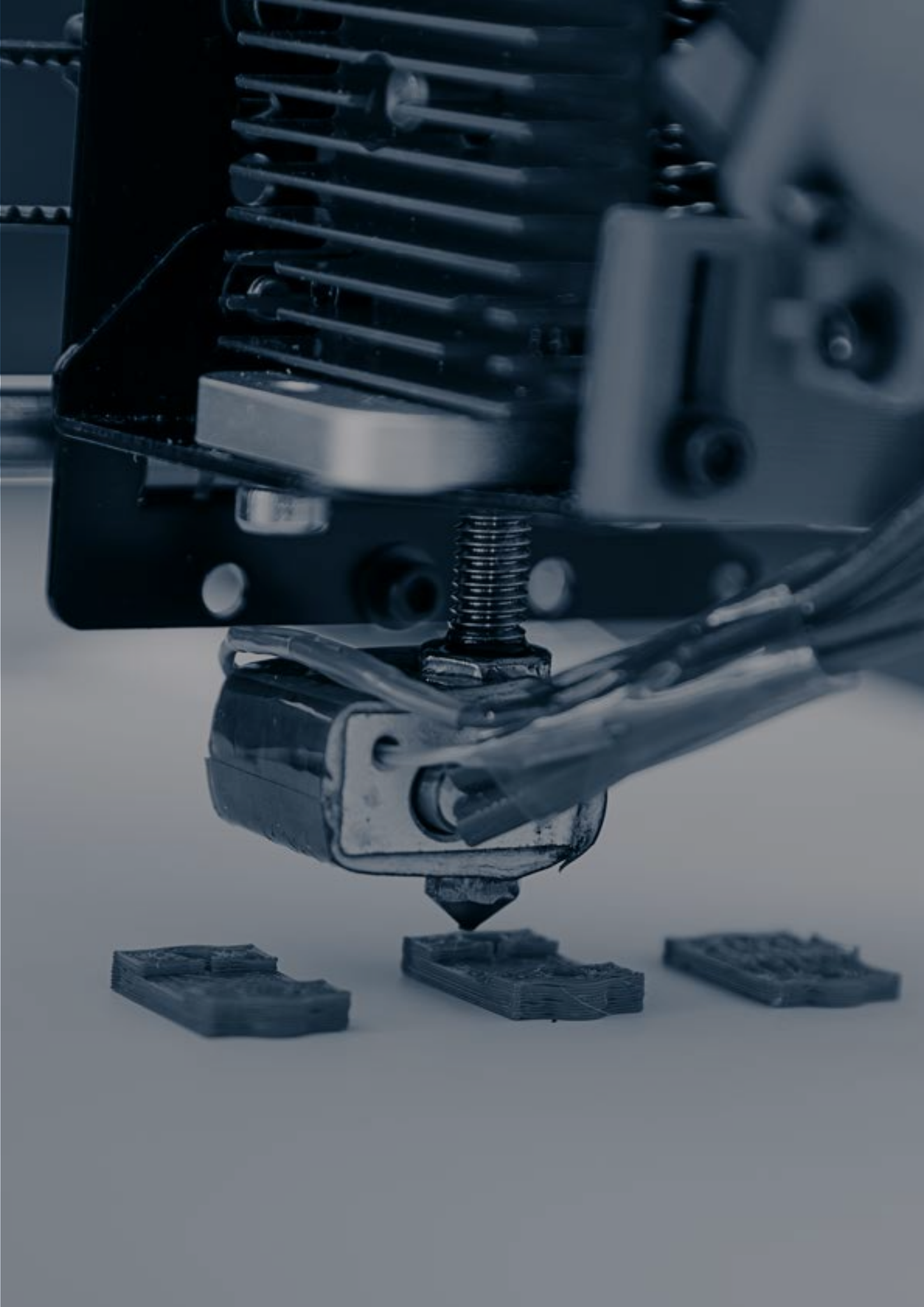
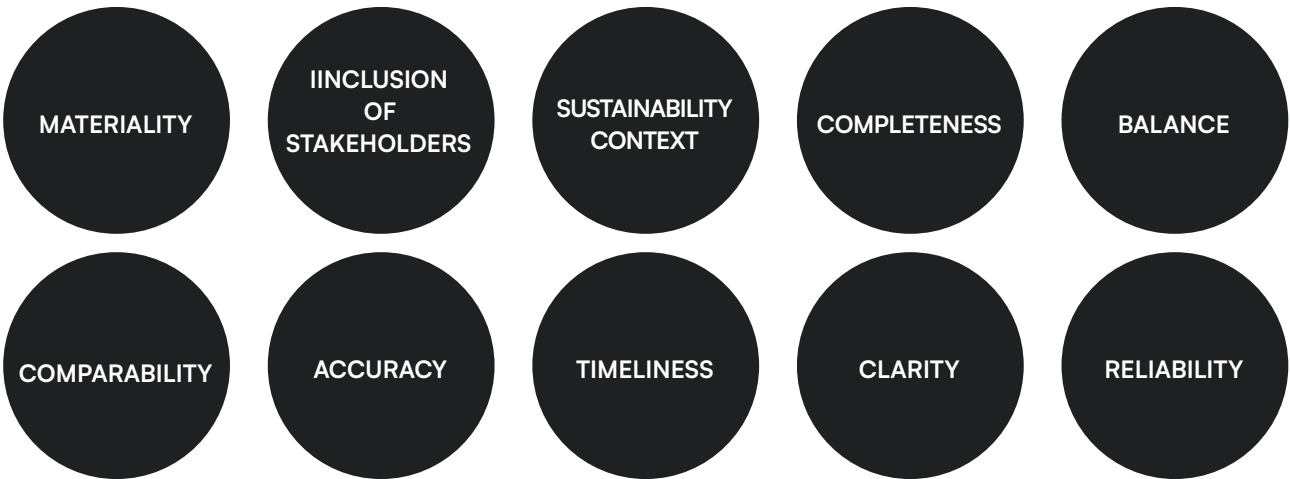




# Methodological Note

The reporting process we followed is based on the AA1000AP standard, an international guide for organizations that wish to integrate corporate responsibility into all their operational areas and reporting processes. AA1000AP was developed for the benefit of organizations of any size or business sector, and provides a practical set of internationally accepted guiding principles with which organizations can effectively shape and manage their sustainability strategy and performance.

The social and environmental sustainability targets that we have set for ourselves have been defined by using tools previously adopted at our corporate offices, such as the code of ethics, which describes our values and principles, the regulation for inclusion in the supplier list, which establishes the selection and evaluation criteria for our partners, the budgets of individual departments, which guide our economic and financial choices, and special reports, which monitor our impacts and our performance.





Our  
Numbers



Promotion Spa

14 Our resources  
198 Training hours

Beauregard SAS

44 Our resources  
338 Training hours

Beauregard Manufacture SA

56 Our resources  
85 Training hours

B&C SA

63 Our resources  
1,264 Training hours



# *Sustainability for the Promotion Group*

Promotion Group has adopted sustainability as a core value and has integrated it into its corporate governance, daily operations and services. The company is committed to pursuing sustainable and inclusive economic growth which enhances current resources while preserving them for future generations. The core of Promotion Group's approach is its active contribution to the United Nations Sustainable Development Goals (SDGs), while meeting its stakeholders' expectations and needs. The company pays special attention to the quality of services provided to customers and to the impacts generated by its business on individuals, the community and the environment. The company's development strategy consists in pursuing innovative and competitive business expansion without compromising its commitment to sustainability.



## Sustainability policies

We have outlined a strategy based on five key pillars.

Such pillars act as a guide for the company's decisions and actions, taking into account the impacts of its business activities on the environment, the society and the economy, as well as its ability to innovate and create value in the long term, taking into account any risks and opportunities emerging from the market.

The **key pillars** of Promotion Group's strategy include:

- **Responsible management of the supply chain:** Gradually transform the supply chain into a more socially and environmentally responsible system by adopting sustainable and transparent practices.
- **Environmental protection and efficient use of resources:** Reduce environmental impacts along the entire value chain through the adoption of sustainable technologies and processes, use of renewable energy sources and reduction of waste.
- **Employee well-being and talent development:** Foster the personal and professional growth of all employees, considered a fundamental and strategic value for the company.
- **Customer focus:** Guarantee the excellence of products and services provided to customer at every stage of their experience.
- **Support and involvement of the community:** Create value for the people and the area in which the company operates through the active involvement of the local community and the promotion.



# Sustainable Development Goals (SDGs)

The drafting of this report was guided by the 17 sustainable development goals (SDGs) drafted by the United Nations Global Compact, which serve as a guide for our actions and represent a global challenge for achieving a better world.

The company has managed to focus in particular on 5 Sustainable Development Goals of the 2030 Agenda for sustainable development, to which it believes it can contribute both through initiatives to mitigate its impacts and through development initiatives.



## 1. Employee and collaborator well-being

With regard to goals 3 and 8 of the 2030 Agenda, we are committed to improving the quality of our employees’ and collaborators’ working life, recognizing their fundamental role in the positive evolution of our organization. We are aware that the well-being of our employees and collaborators is a key factor for the company’s success and for achieving our shared goals for the greater good. For this reason, we have adopted policies and initiatives that promote a healthy, safe and inclusive work environment, where every individual is appreciated and respected. Additionally, we offer professional training and development programs to help our employees and collaborators reach their full potential and grow with the company.



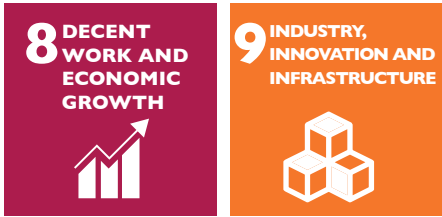
With the aim of fostering positive influences among our employees, we have set targets that incorporate and develop diverse elements:

- **Use of agile working methods** ((Remote Working) in order to promote work-life balance and improve productivity.
- **Improvement of the quality of work premises** in order to create a more comfortable and safe working environment for employees.
- **Integration between the various company offices**, continuous development with a cohesive line.
- **Encouragement of the good care and safety of the working environment** for workers to ensure a healthy and safe working environment for all employees.

## 2. Procurement from local suppliers

Regarding goals 8 and 9 of the 2030 Agenda, we believe it is important to maintain a strong relationship with companies belonging to our local communities, despite our regional expansion and the opportunity to achieve economies of scale.

This allows us to support the growth of our communities where we operate with local offices and to create a positive impact on their economy.



# Our Stakeholders

To establish short- and long-term strategic objectives, Promotion Group carefully assesses all parties that may influence company decisions. In order to maintain continuous engagement and effective discussions, **the company has developed a structured stakeholder engagement process, divided into specific phases:**

- 1

**Identification of parties involved**  
Promotion Group identifies the parties involved in the engagement process of stakeholders, i.e. the parties who may influence company decisions.
- 2

**Relationship management**  
The Group manages relationships with stakeholders through continuous engagement and discussions in order to build solid and lasting relationships.
- 3

**Evaluation of results**  
Promotion Group evaluates the results of stakeholders in order to understand the effectiveness of the process and find any areas for improvement.
- 4

**Analysis of possible improvements**  
Finally, the results obtained are analysed and possible improvements are identified to consolidate relationships.





Stakeholder engagement is a systemic engagement process that integrates the main parties involved in policy decisions or corporate strategies. This approach ensures the interaction with key stakeholders on relevant issues with the aim of creating a constructive and sustainable cooperation.

The method adopted by Promotion Group to engage with stakeholders aims to identify their needs and expectations, whether internal or external, anticipating any problems in managing relationships. Interaction methods may be different and flexible, maximizing effectiveness of engagement based on the stakeholder category. Such methods include corporate surveys of employees, team-building initiatives, newsletters, communications on social channels and on the website, organization of events and meetings, participation in associations, foundations and other forms of partnership or sponsorship.

	COMMON		CITIZENS
	SERVICE CUSTOMERS	PARTNERS	LOCAL COMMUNITY
CATEGORIES	Customers	Shareholders, Partners, Collaborators	Trade associations and representative bodies
TOPICS	Service development	Development policies, budget forecast, financial statements, interim reports, corporate governance	Disclosures and external relations, social responsibility and promotion
INITIATIVES	Workshop, mailing list, website	Yearly economic and financial indicators	Educational activities, sustainability report, transparency plan

Promotion Group is committed to maintaining business ethics and transparency in governance, along with flexibility, innovation and excellence, for the purpose of bringing about meaningful change and challenging the status quo. The organization’s members examine market trends and emerging challenges from different perspectives, seeking new methodologies and approaches to solve the complexities of the present times with a strong commitment to ethics and transparency.

SUPPLIERS		EMPLOYEES	ENVIRONMENT
GOODS, SERVICE AND LABOUR PROVIDERS	LENDERS	DIRECT EMPLOYEES AND EMPLOYEES OF THIRD PARTY COMPANIES	FUTURE ENVIRONMENT
Suppliers of capital goods, outsourced services, construction companies, consultants and professionals	Banks, financial leasing companies, insurance campaigns	Temporary and permanent employees, trade unions	Managed urban waste, resource consumption, environmental impact, area served
Procurement policies, community relations, turnover, payments in due time	Credit facilities, debt, community relations	Composition, activities, absenteeism, health and safety, training, industrial relations	Monitored and managed indicators, corporate social responsibility
Supplier list management, support for social cooperation, anti-corruption plan, code of ethics	Corporate social responsibility, sustainability report, common good report	Production bonus, union agreements, anti-corruption plan, training plan, health and safety improvement plan	Quality, health, safety, environment and energy audit



# *Internal and External Relations*

## **Supplier relations**

Promotion Group aims to build solid and long-lasting relationships with its suppliers based on mutual trust and reliance. The company is committed to collaborating with suppliers to offer its customers top quality products and promote responsible behaviour throughout the supply chain. The choice of suppliers is based on the principles of objectivity, competence and cost-effectiveness, as well as on the principles of transparency and compliance with the most stringent environmental and social standards.

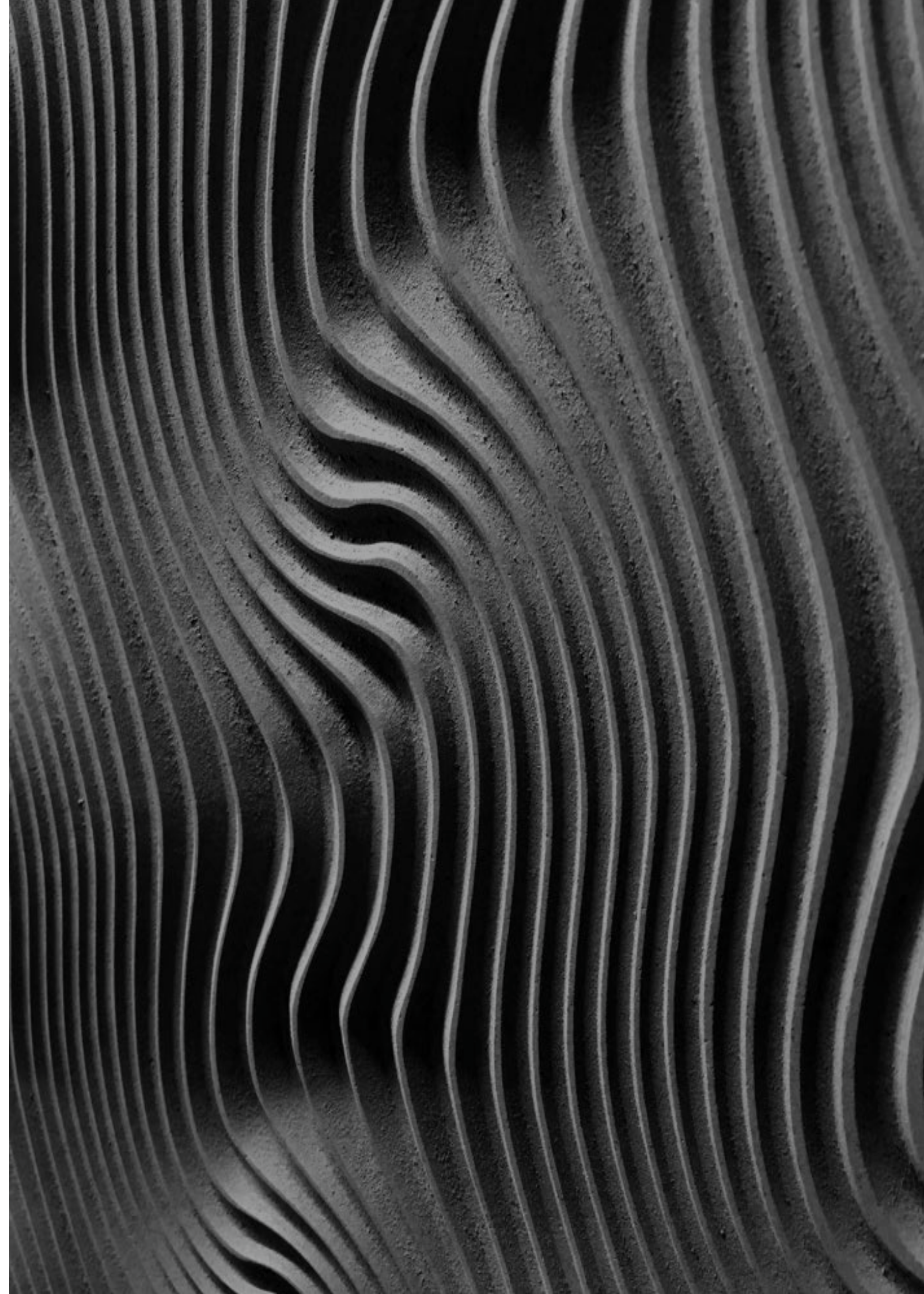
Each supply relationship is subject to compliance with the labour laws in force in the country in which labour is provided and to the adoption, by all parties involved in the production chain, of the principles set out in the Code of Ethics adopted by the Company. By doing so, Promotion Group ensures that its suppliers uphold ethical and responsible practices while manufacturing products in a sustainable way.

## **Customer relations**

Customer relations are essential for any company that wishes to retain its customers and foster growth. To achieve this goal, it is essential for the company to be committed to meeting its customers' demands and building a solid and stable relationship with them based on values such as fairness, honesty, effectiveness and professionalism.

Promotion Group is dedicated to proactively engaging with customers to satisfy their needs with the aim of providing the most suitable product for each of them. We are committed to understanding our customers' needs in depth and offering them solutions that meet their expectations.

Our motto, "Promotion is your solution" , fully reflects this commitment.





# *Rules and Standards of Conduct*

## **Accounting**

The accounting of all business transactions must be kept in accordance with national laws and accounting principles, based on the principles of transparency, clarity and truthfulness. Each employee is required to cooperate to ensure that the information recorded in the accounts is true, accurate and complete, as well as always verifiable through precise and chronologically ordered supporting documentation.

Promotion Group believes it essential that every employee upholds integrity and transparency in keeping accounting records and documentation, ensuring that no accounting entry is made unless it accurately reflects the truth.

## **Grants and sponsorships**

Promotion Group is committed to only supporting activities that are useful for product development and technological innovation and aim to improve social and environmental aspects or that originate from cultural or social promotion agencies. We are proud to contribute to the creation of a sustainable future and a better world for everyone.

## **Confidential information**

All confidential information collected by Promotion Group will be treated in accordance with the law in the utmost respect for the rights of those who have provided such information.

Confidential information means all “sensitive data” regarding individuals and their private life, and all the Know-How, drawings, formulas and patents owned by third parties disclosed to the Company. The Company undertakes to observe the principles of data integrity and availability, also protecting its information systems from unauthorized access and use and from the risk of illegitimate disclosure of the data processed.



## Our expertise

Once the most suitable manufacturing process has been identified, Promotion Group uses a global network of proprietary or third party production sites, each with its specific equipment and expertise. Thanks to this network, we guarantee an optimal production flow in terms of quality/price ratio, respecting the desired origin with total transparency and impeccable traceability. Our goal is to provide the best possible product, customized to the specific needs of each customer.

If a customer has special requests, we suggest a number of alternatives suited to the final service desired. Moreover, we provide assistance in the design, choice of materials and definition of production requirements. We are committed to ensuring the highest quality of the products and services on offer, meeting the needs of each customer efficiently and professionally.

## Dynamism and reactivity

Speed in finding technical and production solutions that meet the customers' and the market's needs is crucial to the success of any business. We consider timeliness our way of life, based on the design of innovative solutions and their implementation through advanced methods. This characteristic is essential to meet the specific requirements of each customer and ensure maximum efficiency in every phase of the production process.

## Overcoming technical limitations

Inventing and discovering the technology of the future to meet increasingly high quality standards and obtain products that meet the needs of demanding customers is a challenge that requires continuous innovation and research. With its expertise and determination, Promotion Group will not hesitate to break existing technical limitations in order to stay at the forefront. In a world where production techniques, management systems and technology are evolving rapidly, Promotion Group has adopted solutions originating from industrial sectors other than watchmaking to guarantee high-quality products and meet the needs of its customers. Continuous evolution and innovative approach allow the company to face new challenges.





## Health protection and sustainability

True innovation only happens when people and the environment are respected.

This is confirmed by the increasingly demanding requirements of modern consumers with regard to the hypoallergenic qualities of products, especially those that come into direct contact with the skin.

Our numerous standards and certifications testify to our constant commitment to ecology and protection of humanity; in particular, we are dedicated to ensuring that our products are safe and respectful of the environment, without compromising quality. We are proud of our constant commitment to improving and guaranteeing the highest possible quality and safety standards of our products.

## Sharing targets

Each year, the Group sets business, quality and efficiency targets for each department. Regular meetings between Management, department heads and other staff make it possible to monitor progress, address any critical issues and introduce new service standards, ensuring that the targets are achieved in a timely and effective manner.

## Recruitment and compensation policy

A continued commitment to reducing the employee turnover rate is an important action for any company. To achieve this goal, Promotion Group promotes numerous activities related to the professional development of its employees, strengthening their sense of belonging, sharing corporate values and improving the corporate climate.

These activities include training programs, opportunities for professional growth, corporate meetings, team-building events and much more.

In short, the company has adopted a number of measures to reduce its employee turnover rate and improve the corporate climate. These measures can help keep employees satisfied and motivated, improve their productivity and quality of work and promote the organization's growth.

## Gender equality

The implementation of systems that promote gender equality is a crucial factor for achieving success and competitiveness within a company. During the selection phase, individual skills and experiences are assessed impartially, without any gender discrimination, ensuring a fair and meritocratic process.

Promotion Group has always shown to be open towards women who need to reconcile professional advancement with private life events, such as motherhood or time to be spent with their loved ones in general. This perspective reflects the company's commitment to promoting an inclusive corporate culture, respectful and aware of individual needs, which helps to build a working environment that appreciates and supports every team member regardless of gender.

## Internal communication

Communication within the company is constant and transparent and is a key aspect to ensure the correct operation and success of the organization. The company uses various tools to facilitate the sharing of key information with all staff. This is how it happens:

- **Internal memos:** Any updates on product standards or changes to internal procedures are communicated to all department heads and shared with all staff. This ensures a harmonized flow of information and a shared understanding of company developments. This communication process is essential to ensure that all staff are informed about the latest news, feel involved and have the motivation to adapt to the new procedures effectively.
- **Regular meetings:** Departmental and cross-departmental meetings are held regularly to discuss news, events and how operations are progressing in general. This discussion forum fosters active participation and sharing of opinions among team members. Departmental meetings are meetings that involve members of a single department or team, while cross-departmental meetings involve members of multiple departments or teams. Departmental meetings are useful for discussing department-specific issues, such as activity planning, performance evaluation, target setting and problem solving. Cross-departmental meetings, on the other hand, are useful for discussing issues that affect the entire organization, such as business strategy, policies and procedures, and sharing best practices. In both cases, these meetings provide an opportunity to exchange ideas, share information and make collaborative decisions.

- **Corporate communication:** The company's Senior Management shares the company's successes and press coverage resulting from public relations activities through timely communications. This helps to keep all staff informed about the company's positive results and to consolidate their sense of belonging and trust in the organization. In this way, employees feel involved and motivated to work for the good of the company. Sharing positive information about the company's successes can also help improve its reputation and attract new customers. Furthermore, sharing information about the company's successes allows employees to better understand their role within the organization and how their work contributes to the company's development.







# *Company Profile*

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Our history  
Our values  
Governance



# Our history

Promotion S.p.A. was founded in Vicenza, the main Italian hub for the production of gold and jewellery, in 1978.

The company specialized in the marketing of watch components with the aim of providing turnkey solutions to its customers without being directly involved in production.

Over the past forty-five years, the company's structure has developed significantly, with far-reaching strategic changes that have had direct implications on production.

These developments have made Promotion S.p.A. an important international point of contact for the world of watchmaking, one that controls the entire production process of straps in steel, steel-gold, gold, titanium and other alloys.

**In the early 2000s** the company set up a corporate "Research and Development" department to improve production technology (laser technology/special steel research) and offer innovative solutions to its customers.

Alongside this department, the company has set up a corporate laboratory where all bracelets produced in-house or by third party suppliers are tested in order to always monitor and guarantee production.

The group has achieved significant variability and traceability in the number of employees, with a workforce that dynamically adapts to market needs.

The company places great importance on training, providing growth opportunities and involving young people in a stimulating and constantly evolving work environment.

During its 45 years in business, the company has remained young and modern and has always satisfied every customer request.







## 1978

*Promotion Spa*  
Vicenza - Italy

Group headquarters, in operation for over 45 years in the production of high-quality components for watches.  
“The origins of the Promotion adventure.”



## 1998

*Beauregard SAS*  
Couteuges - France

Production site specializing in “Made-in-Europe” productions of components for the watchmaking industry, with specific expertise in the assembly, finishing and laser-welding of bracelets.



## 2007

*Beauregard Manufacture SA*  
La Chaux-de-Fonds - Switzerland

Centre of excellence for “Swiss-Made” productions and “preferential Swiss origin” productions of watch components, especially those that use precious materials.



## 2021

*B&C SA*  
Canedo - Portugal

Plant dedicated to the polishing, finishing, assembly and laser-welding of a wide range of watch products.



# *Vision and Mission Statement*

In a world where elegance merges with innovation and tradition embraces modernity, Promotion Group has emerged as a solid and reliable partner in watchmaking, standing out for its dedication.

The company's history is interwoven with passion, the savoir-faire of an artisan and an unwavering commitment to innovation.

The Vision, Mission and Values of Promotion Group are not only key pillars of our corporate identity, but are the beating heart that drives every creation.

## **Vision**

Promotion Group believes that watchmaking is more than just measuring time, but rather a symphony of craftsmanship and innovation.

Our vision brings tradition and the avant-garde together on the theatre stage of the future, transforming our customers' ideas and needs into real products.

Our passion for watchmaking is reflected in the quality of our products, crafted with premium materials and meticulous attention to detail.

The art of watchmaking becomes living history, interwoven with meaning, elegance and a lasting commitment to sustainability.





## Mission Statement

Promotion Group's mission is embodied in a deep commitment to translating this vision into tangible reality.

In this journey, we are committed to ensuring:

- **Excellence without compromise:** Each Promotion watch component is the result of a relentless pursuit of perfection. From design to assembly, we are committed to exceeding quality standards, ensuring that every detail reflects our dedication to excellence.
- **Innovation as a beacon:** By using advanced technologies and cutting-edge designs, we aim to inspire the world of watchmaking with creative and visionary solutions, embracing innovation as the driving force of our growth.
- **Integrity in the creative process:** We operate with ethics, transparency and consistency in every phase of our creative process. Each product keeps the artisan's promise of integrity, where tradition blends harmoniously with modernity.
- **Sustainability as a permanent commitment:** We recognize our responsibility towards the environment and are committed to preserving the earth and natural resources. Our production embraces sustainable practices, demonstrating that elegance and style can coexist with environmental responsibility.
- **Diversity as a source of inspiration:** We value diversity as a source of inspiration and a driving force for our growth, each person actively contributing to collective wealth.
- **Social Responsibility as a commitment:** We recognize our responsibility to positively shape communities. We engage in initiatives that improve the quality of life and contribute to social well-being.



# Our Values

The principles contained in the Code of Ethics underpin the Company's internal organization in the hope that all external players who come into contact with Promotion Group also share and implement such values. Our Code of Ethics is addressed to all corporate bodies, employees, directors, contractor companies and third parties. It requires recipients to always act in accordance with the principles of honesty, loyalty, diligence, impartiality and to comply with the regulations in force in the countries in which they operate. Furthermore, the Code of Ethics fosters cooperation and collaboration among recipients in order to guarantee continuous and mutual human and professional enrichment allowing the latter to base their conduct on mutual cooperation and collaboration.

Consistently upholding and embodying these values has always been the Company's strongest hallmark, demonstrating that, through collaboration, continuous and mutual human and professional growth is achievable. In this sense, Promotion Group and its employees place themselves at the service of each other as well as of all the parties involved, whether inside or outside the Company.

## Centrality of the individual

Promotion Group is a company that has always placed the individual at the centre of its efforts and is committed to respecting human dignity and human rights, as established by the Universal Declaration of Human Rights of the United Nations. Human dignity is a fundamental condition based on which the Company develops and shapes its activities, also benefiting from it as an inspiration for its future projects.

The protection of physical and moral integrity and support for the technical and professional enrichment of individuals are indispensable resources for success. Furthermore, we actively promote behaviour based on mutual respect, kindness and fair and respectful treatment of each employee and collaborator, rejecting any form of discrimination based on characteristics such as age, health status, disability, gender, religion, race, ethnic group, nationality, sexual orientation, gender identity and/or expression, marital status, pregnancy, political and cultural opinions.

The company protects workers who may be facing situations that limit their action (such as pregnancy, maternity, accidents at work, health condition, etc.) through active policies, by adopting specific measures aiming to preserve the physical and moral integrity of individuals in compliance with applicable regulations.

## Labour protection

Promotion Group adopts and implements the safety standards required by applicable labour legislation to ensure occupational health and safety. The Group repudiates any form of child labour, forced or coercive labour and discrimination in hiring policies and human resource management. Furthermore, the Group guarantees all workers the right to fair and regular remuneration, protecting them from any type of discriminatory or degrading treatment. The Group is committed to preventing all forms of harassment and exploitation at work, whether direct or indirect, and to recognizing merit, work performance and professional potential as the decisive criteria for salary increases and career developments. The Group also promotes and guarantees the workers' freedom of association with trade unions and recognizes their right to collective bargaining.

The Group has undertaken an unwavering commitment to providing its employees with a healthy and safe working environment, adopting and implementing the safety standards required by applicable labour legislation, and providing its employees with the personal protective equipment necessary to carry out their work safely, promoting permanent training of its employees in order to improve their skills and ensure a safe and productive working environment.



## Protection of the environment

The Group is committed to adopting precautionary criteria and taking the necessary action to prevent any business activity or practice being carried out at its premises or on its behalf from directly or indirectly altering natural ecosystems.

We have adopted a number of measures to reduce the environmental impact of our services, such as the use of recyclable materials and the implementation of policies to reduce waste and paper consumption. Furthermore, the company has launched a series of projects for environmental protection, such as promoting recycling practices and participating in environmental awareness-raising programs. In all its activities, it is necessary and essential for the Group to seek the most effective and efficient operational solution allowing it to minimize air, water and soil pollution, the accumulation of substances extracted from the subsoil or produced artificially, and the wasteful use of natural (originating from water, plants, animals, minerals, etc.) and energy resources.

Promotion Group is committed to ensuring that precious materials are sourced in an ethical, responsible and environmentally friendly manner. To this end, the Company has joined the Kimberley Process Certification Scheme for the supply of diamonds and responsible sourcing of gold for precious metals.

Furthermore, we undertake to directly involve the above-mentioned Recipients in the pursuit of the purposes laid down in the Code of Ethics, calling upon them to scrupulously comply with applicable regulations on environmental protection, to adopt the most stringent legal criteria and, where appropriate, to apply international directives.



## Compliance with laws, regulations and social responsibility

Promotion Group believes that compliance with national and international regulations is a binding and essential condition for its actions in compliance with all applicable laws and regulations, implementing the necessary control actions and applying penalties where necessary, investing in specific information and crime prevention programs. By meeting the operational requirements set by the Responsible Jewellery Council, the Group is committed to implementing and promoting ethical principles, respect for human rights and social practices in a transparent and responsible manner, pursuing a production model that respects and safeguards human rights, the regenerative capacity of the Earth and the well-being of communities.

The Company guarantees the traceability of the precious metals used in its production chain, ensuring the exclusive use of materials from responsible sources (not originating from illegal activities or from armed conflict zones financed by the sale of precious metals). This is in accordance with the “OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas”. Moreover, suppliers involved in processing operations are monitored regularly.

The Group has adopted all the necessary measures to spread awareness as to the importance of a responsible, sustainable and carefully-managed supply chain and uses its influence to promote relationships based on respect for ethical principles.

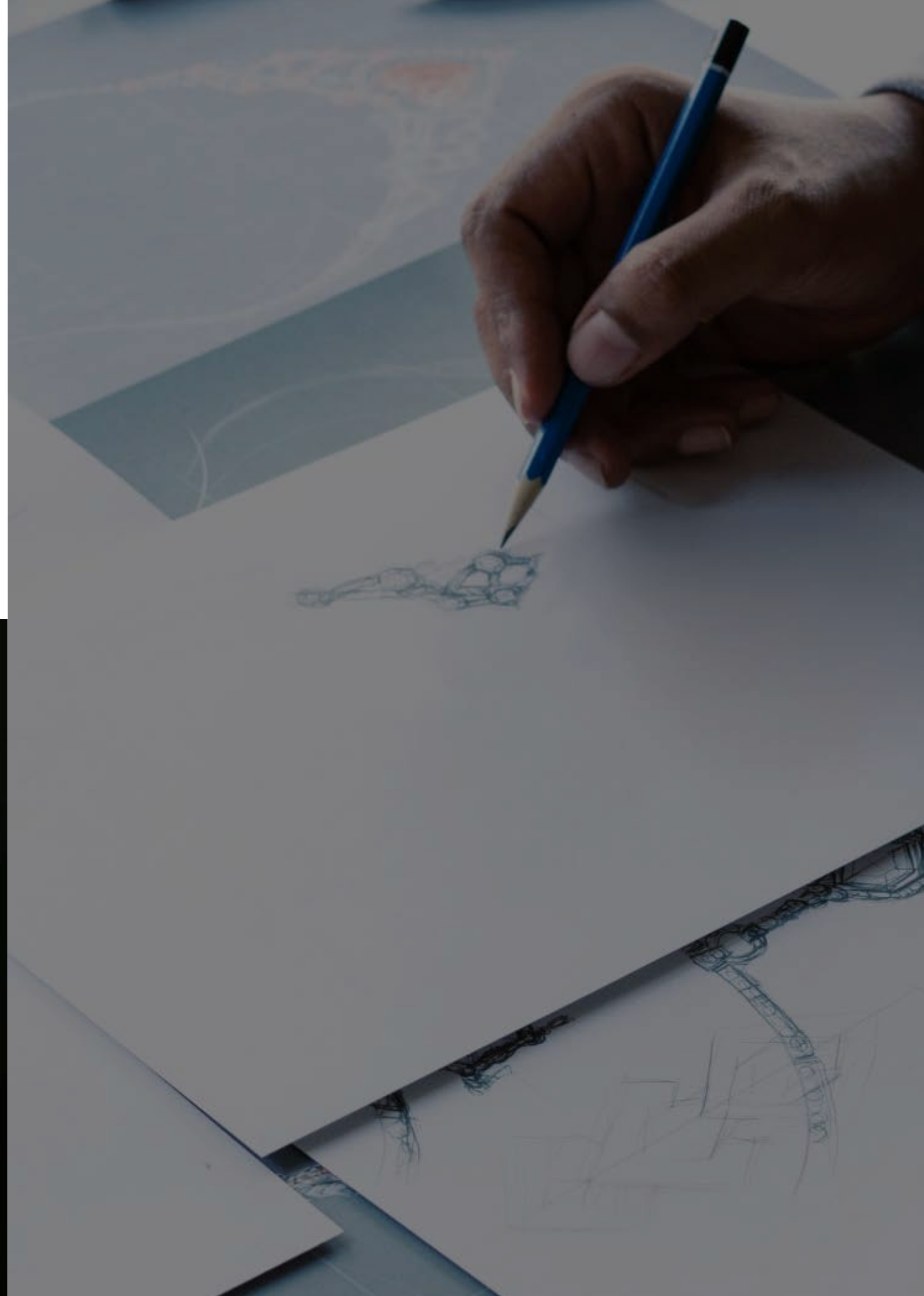
## Honesty and transparency

The company provides transparent and correct information, making statements in a clear, transparent, accurate and timely manner, not only in external relations but also in internal relations with all parties who perform their work duties at its premises. Furthermore, Promotion Group does not tolerate any form of corruption and money laundering and undertakes to carefully and constantly monitor the same in order to reveal and counter any suspicious practice. In the context of relations with public- or private-sector third parties, all group members must refrain from offering or accepting benefits, gifts, acts of courtesy or hospitality that may compromise the objectivity of the decision-making process. Any direct or indirect benefit must be avoided if it is capable of affecting the Group’s choices and activities.



## Technology and innovation

Innovation and constant technical research are the driving force that ensures the Group's lasting development in the firm belief that the evolution of technology is an essential element to create and provide customers with innovative products with an added value that may set them apart within the market and with an increasingly higher quality level. Therefore, the Company is committed to constantly seeking the optimization of business processes to achieve the highest level of effectiveness and efficiency, ensuring the quality level of its products over time and always meeting the industry standards to the fullest. Innovation, search for new solutions and creativity must be values to be pursued as fundamental goals, incorporating and spreading them among third party collaborators. The Group has begun a process of generational transition and managerialization, aiming to build a corporate structure and to dynamically open up to the new, without, however, distorting its identity. The transition will occur through a specific organizational process whose purpose is to give continuity to the longstanding values of Promotion Group reformulated according to the evolution of the cultural, social and economic context that the world has experienced over the years.



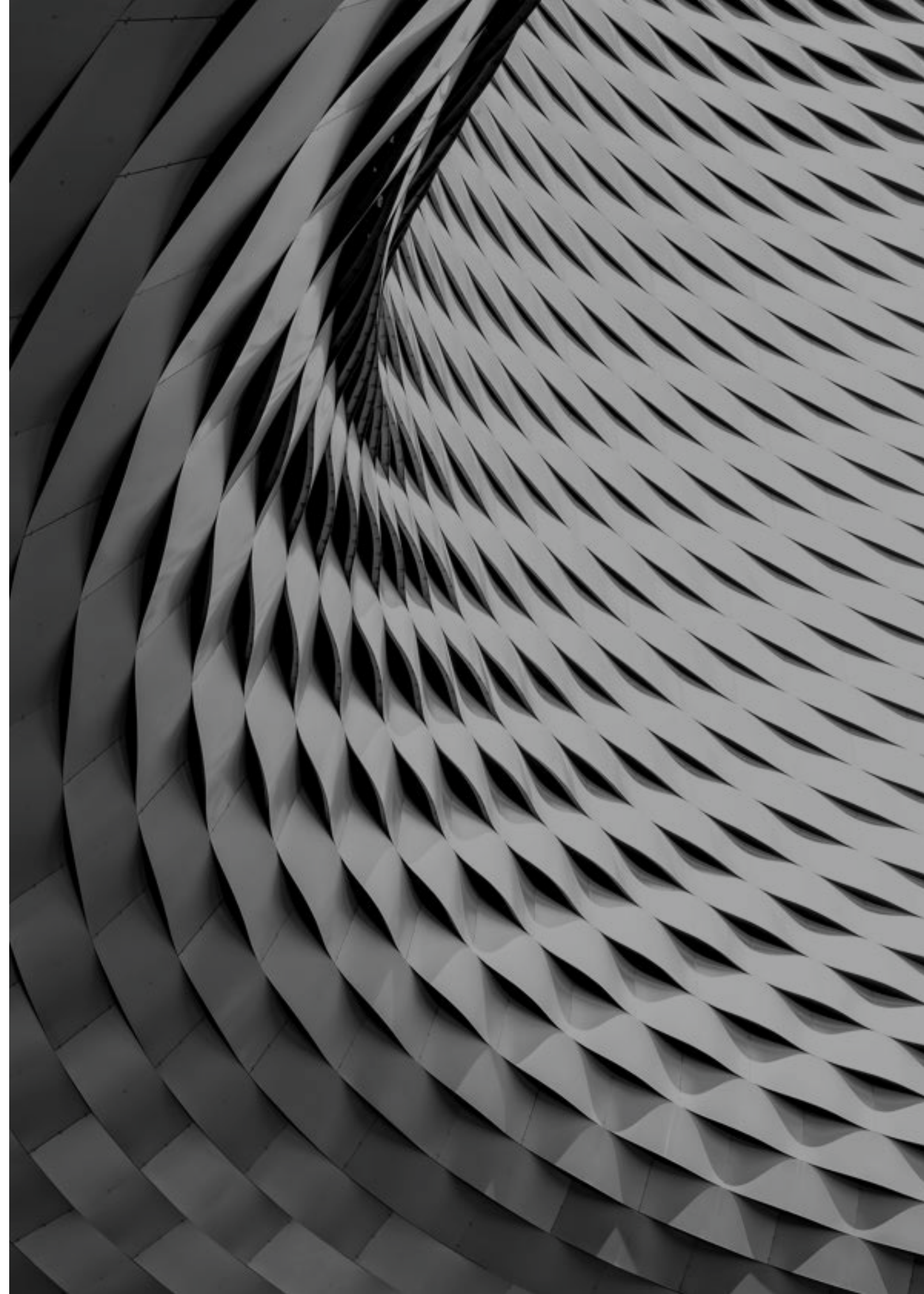


# Governance



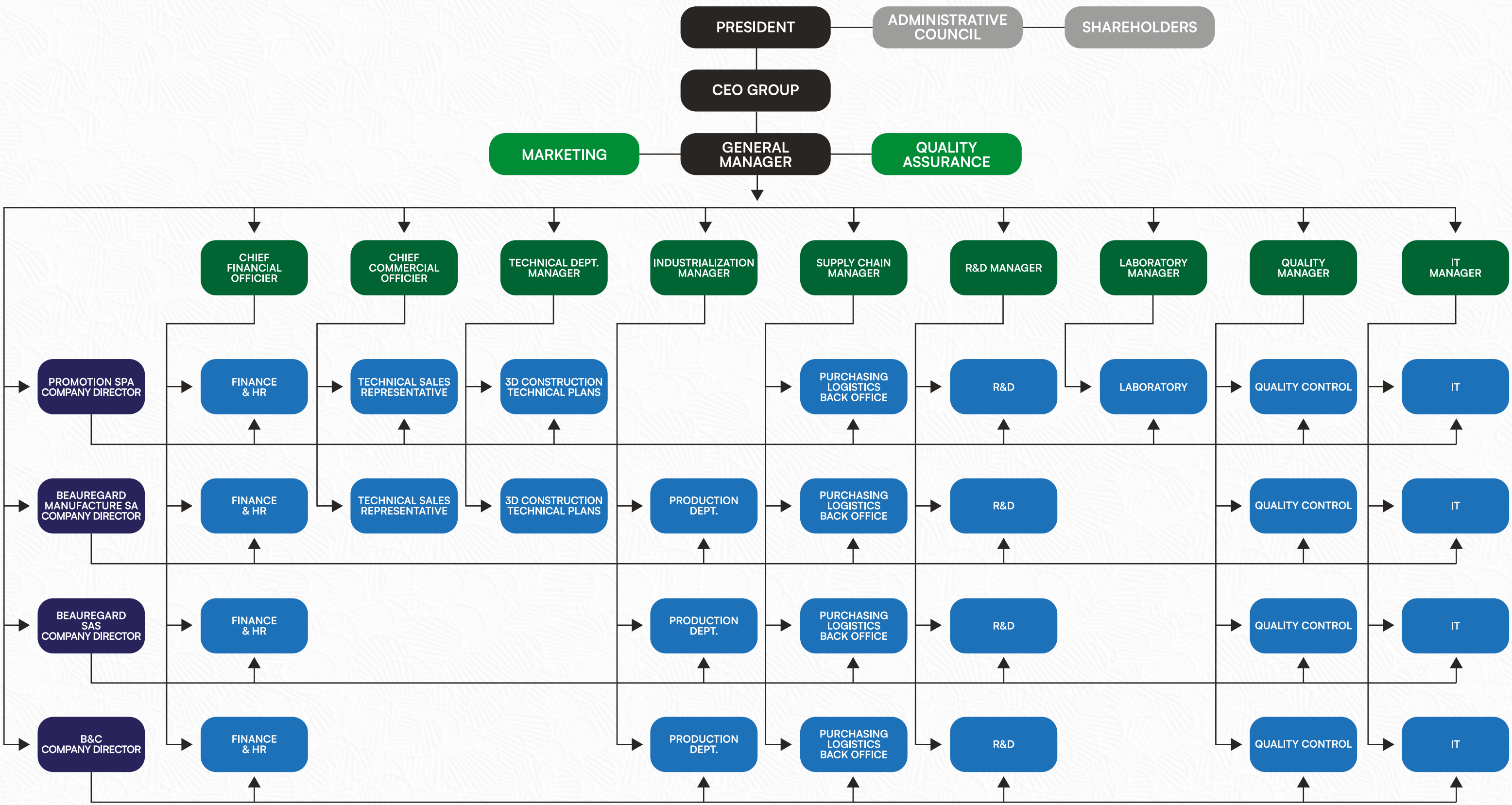
Corporate Governance is a crucial factor for business success. It is defined as a set of rules and processes that shape the strategies, objectives and operating mechanisms of a company. It acts as a guide in the decision-making process and in defining the strategic lines to follow.

Below, we present the Group's current governing structure and the key people currently in office:





Promotion Group:  
Functional Chart



EXECUTIVE COMMITTEE OF THE BOARD

The Governing Body is responsible for defining strategic objectives, corporate policies and investment plans, ensuring that they are aligned with the company’s vision and sustainable growth. Furthermore, it is responsible for approving processes relating to the services being provided, defining and supervising the corporate control units, approving and monitoring the organizational structure and definition of tasks and responsibilities, controlling the information flow system, and ensuring that the compensation and incentive structure does not increase corporate risks. The Governing Body is primarily responsible for corporate operations and for the oversight of corporate activities to ensure that the company can adapt to market changes and maintain its competitive edge.

Board of Directors

Rasia Giovanni	Chairman of the Board of Directors	Company representative
Buise Pierre	Executive Director	Company representative
Rasia Angelo	Executive Director	
De Lorenzo Maurizio	Executive Director	

STATUTORY AUDITORS, MEMBERS OF CONTROL BODIES

The Executive Committee of Promotion Group is the corporate body responsible for defining corporate strategies and policies, coordinating the activities of the various functional units, monitoring economic and financial results, and managing relations with internal and external stakeholders. In other words, the Executive Committee is responsible for the company’s operational management.

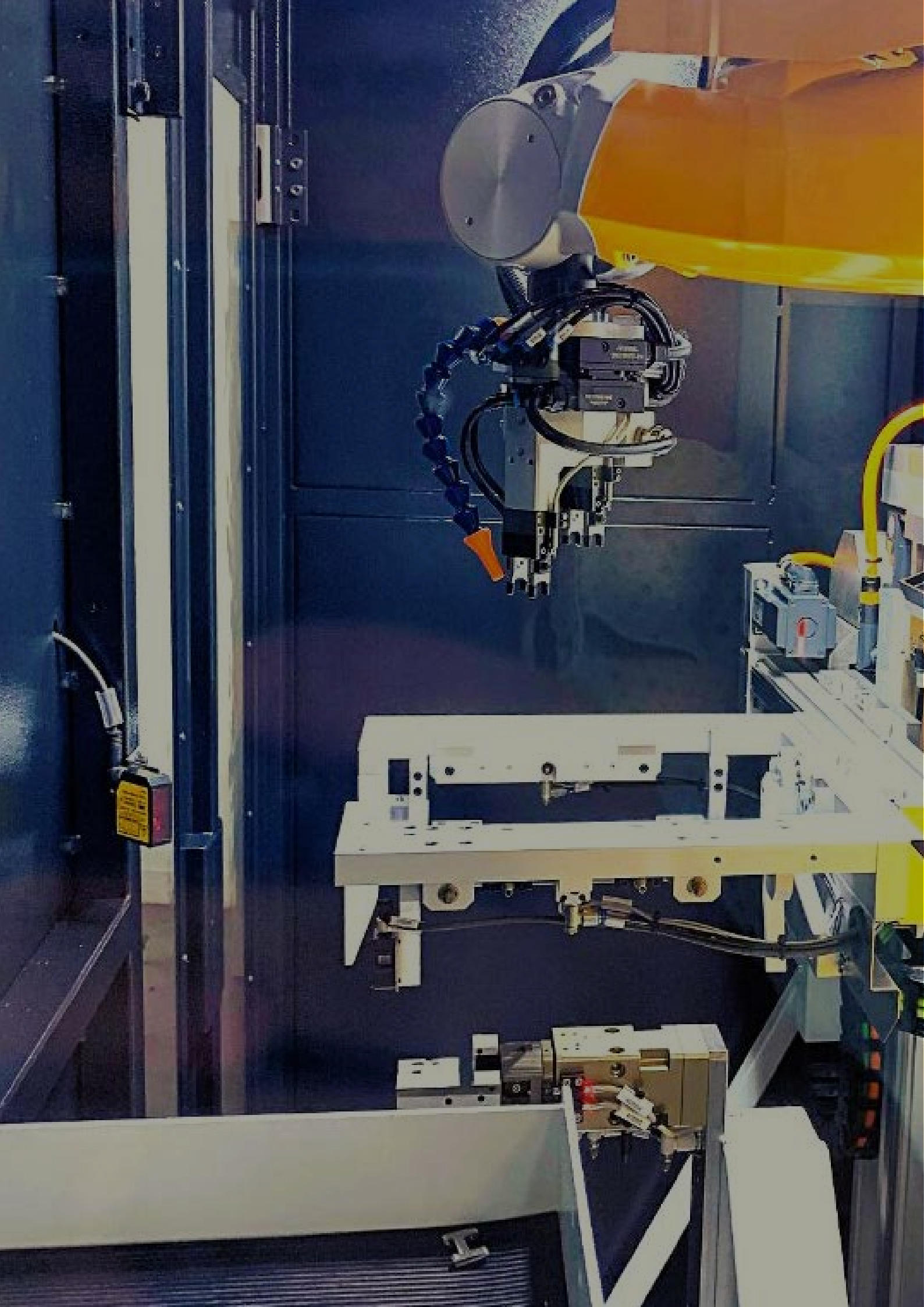
Statutory Auditors, members of control bodies

Camporiondo Marta	Chairman of the Board of Statutory Auditors
Bruttomesso Alida	Statutory Auditor
Zanetti Gianluca	Statutory Auditor
Sgevano Francesca	Alternate Auditor
Castegnaro Roberto	Alternate Auditor
Tedone Carlo	Independent Auditor

Company Directors

Promotion SPA	Maurizio De Lorenzo
Beauregard SAS	Didier Desfonds
Beauregard Manufacture SA	Romain Klaye
B&C SA	Pedro Calçada





# *Distinctive Features*

The distinctive features of  
Promotion Group

## Sustainability

Corporate sustainability is a strategic, responsible approach to managing business activities which takes into account the economic, social and environmental impacts generated throughout the life cycle of a company. For us, sustainability does not only mean adopting a business model that aims at economic and financial success, but one that goes beyond that. It involves creating value for all our stakeholders, carefully considering all their expectations and needs. At the same time, this means taking responsibility for the environment, reducing our impact and promoting environmentally friendly solutions.

For us, sustainability also implies a tangible social commitment, actively contributing to the development of local areas and to the growth of people. Integrating sustainability into business operations means incorporating economic, social and environmental considerations into the company's daily decisions and management practices. Corporate operations are the fertile ground on which to apply sustainable strategies to ESG (Environmental, Social, Governance)-related factors on a daily basis. The essence of an ESG-oriented sustainable strategy consists in considering businesses, stakeholders and all parties involved as players in the creation of value for the entire society.

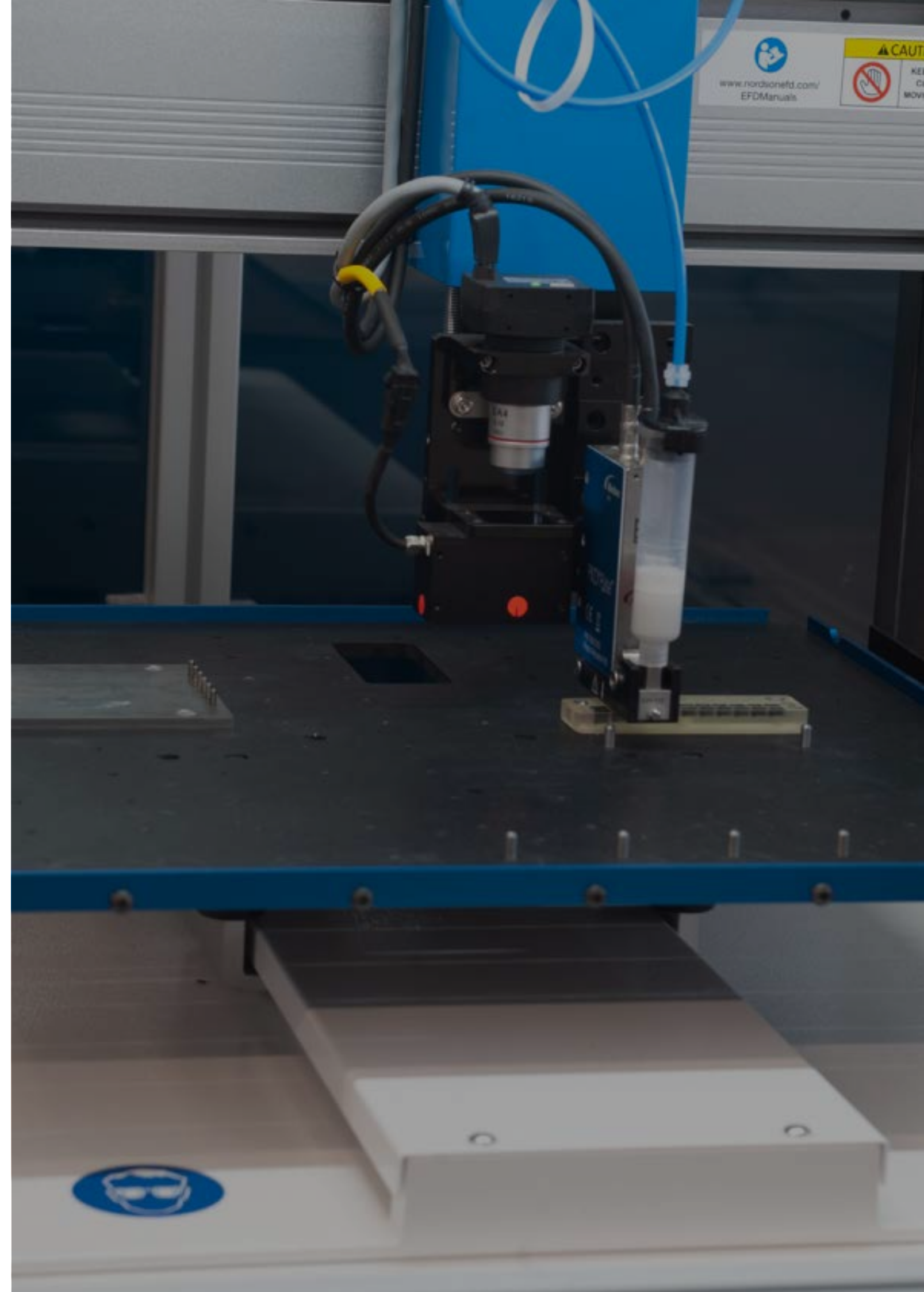
## Our people

We consider people as our most valuable resource and main differentiating factor. Our employees are the driving force behind the quality of our services and trust in our products. We are therefore committed to enhancing their skills, motivating them, training them and ensuring their well-being. The satisfaction of our employees is a strategic objective for us, on a par with the satisfaction of our customers.

## Customer relations

Our business is based on trust, a value that we try to earn and maintain through our professionalism, competence and transparency. We consider ourselves our customers' partners, supporting them in their daily operations.

Our goal is to identify the best opportunities for our customers and to support them in the prevention and management of risks in the increasingly complex and dynamic environment of today's market. Furthermore, we are committed to providing high-quality personalized services to meet each customer's specific needs. We believe that our attention to detail and dedication to work are essential for the establishment of strong and lasting relationships.





**Company regulations for the use of the IT system**

The growing spread of new information technologies, combined with free access to the Internet through Personal Computers, exposes Promotion Group to financial and criminal risks. These risks may have adverse impacts on the company’s security and corporate reputation. To ensure the diligent and correct use of IT resources, Promotion Group has drafted Regulations for the use of its IT resources. These Regulations aim to lay down the rules for the use of IT resources in a safe and responsible manner. In particular, the Regulations lay down procedures for access to IT resources, management of company data, information security, data confidentiality, protection of IT systems and user responsibility.

**Use of personal computers**

Personal computers are a work tool and their use must be strictly limited to work duties. Access is protected by password, which must be diligently guarded and never disclosed. The data controller has the right to access the data processed by each user, ensuring compliance with the regulation and system security.

**Password management**

Passwords must be changed regularly, must be at least eight characters long and must not contain references that can be easily traced back to the user. Sharing passwords is absolutely prohibited.

**In addition: laptops, the Internet, emails**

To ensure security, unauthorized use of external programs and devices is prohibited. Use of the Internet is permitted only for work purposes, with a ban on any financial transactions and non-professional activities. Use of the company email should be strictly professional, with the obligation to keep it tidy.

**Privacy compliance**

È obbligatorio rispettare le disposizioni in materia di privacy e seguire le misure di sicurezza.

**Penalties for non-compliance**

Failure to comply with company rules may result in disciplinary action, civil or criminal action according to the law.





# *Social Impact*

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Training and development  
Health and safety of employees  
and collaborators



Promotion Group recognizes the importance of Human Resources for its development: staff that are adequately trained, valued, motivated and involved in the corporate spirit represent a prerequisite for achieving corporate objectives.

Human resources management is oriented towards the well-being of individuals and a path of professional growth guided by merit aiming to develop skills while taking into account each employee's professional aspirations. Decisions regarding the assignment of tasks or positions of greater responsibility are made according to the individual employee's professional profile and actual competencies and ability to contribute to the achievement of individual or corporate objectives.

Promotion Group promotes personnel management aimed at preventing any discrimination that may arise from the gender, ethnic group, religious faith, marital status, sexual orientation, age, disabilities and political beliefs of its staff. Respect for human rights is a fundamental value for the company, which is committed to guaranteeing dignity, freedom and equality for all its staff and to combating any form of violation or abuse.

Human resources organization is a key task for every company, since business success depends largely on the quality of the work done by its employees. This section deals with any activities relating to personnel management, including selection, training, performance evaluation, career planning, salary and benefits management, conflict management and change management. We believe that involving employees and encouraging their professional growth is essential to ensure the continuity of positions, duties and upholding the values rooted in the Group's cultural and generational background. Over the past two years, we have prepared a regular training path according to a plan aimed at involving workers in educational and professional experiences that stimulate their participation and interest in the entire business cycle. To implement this internal training path, we have entrusted the initiative to expert professionals who started a "learning path" in September 2022, initially involving the owners and management. The focus of this project is on individuals, aiming to promote a process of self-awareness that translates into individual improvement, strengthening of relational skills, consolidation of soft skills and greater sense of belonging to the group. During 2022, we prepared a "Corporate Welfare Plan" focused on specific personal events, paying special attention to the well-being of employees on a personal and a family level. We give value to the bond between Company and Family, offering contributions that support educational growth within our employees' families.

## Recruitment and selection

Promotion Group seeks the best talents for its activities and carefully evaluates various qualities during the recruitment process. The most important ones certainly include:

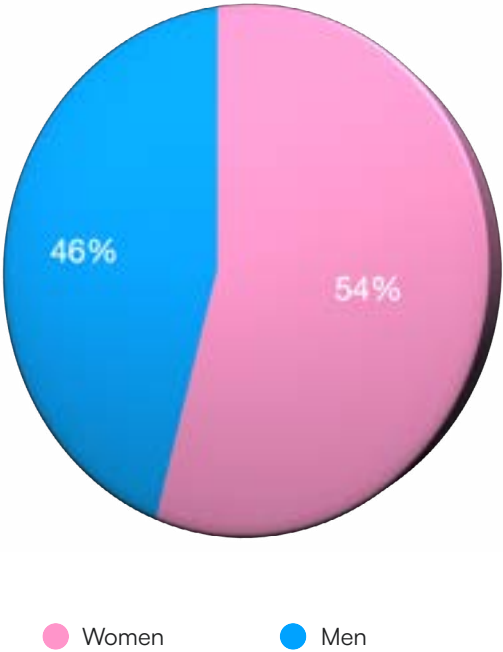
- **Skills:** People with a solid professional background who are able to apply their knowledge and skills to the various situations and challenges that may arise in this increasingly changing world.
- **Dynamism:** People who are flexible, proactive and constantly growing, who know how to adapt to changes and seize the opportunities that the market offers.
- **Motivation:** People with strong personal and professional motivation who share the same vision and values as those embraced by the Group and are oriented towards achieving the same goals.
- **Passion:** People with a passion for their work, enthusiastic and curious, willing to get involved and do their best in the face of any challenge that the future may hold.
- **Commitment:** People with a high sense of responsibility and dedication, reliable and scrupulous, who respect deadlines and the expectations of customers and colleagues.
- **Ability to work in a team:** Ability to relate and communicate with all parties involved. Constructive and respectful cooperation with others and openness to discussing and sharing ideas are essential qualities for people wishing to work for our company.

Finally, at the time of signing the employment contract, the newly employed worker undertakes to respect all the principles and rules of conduct set out in the Group's Internal Regulations.

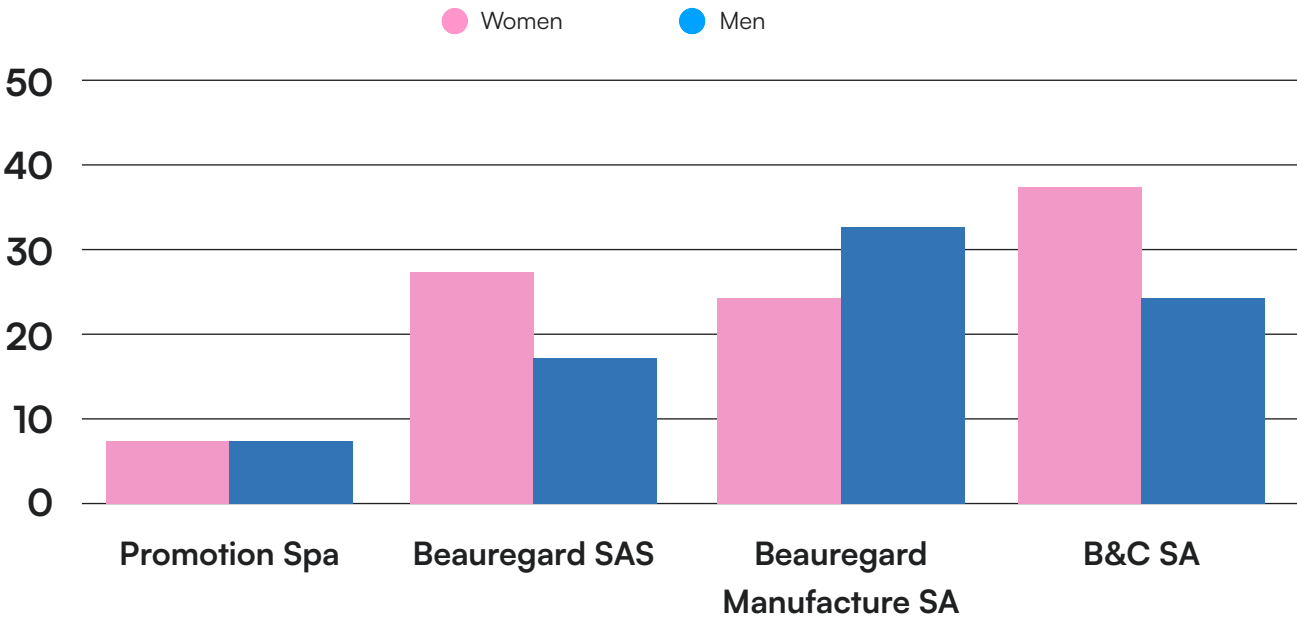
Employment data

GENDER	TOTAL
Women	96
Men	81
Total	177

EMPLOYMENT DATA



COMPANY	GENDER	EMPLOYEES	TOTAL
Promotion Spa	Women	7	14
	Men	7	
Beauregard SAS	Women	27	44
	Men	17	
Beauregard Manufacture SA	Women	24	56
	Men	32	
B&C SA	Women	38	63
	Men	25	
TOTALE	Women	96	177
	Men	81	





# Training and Development

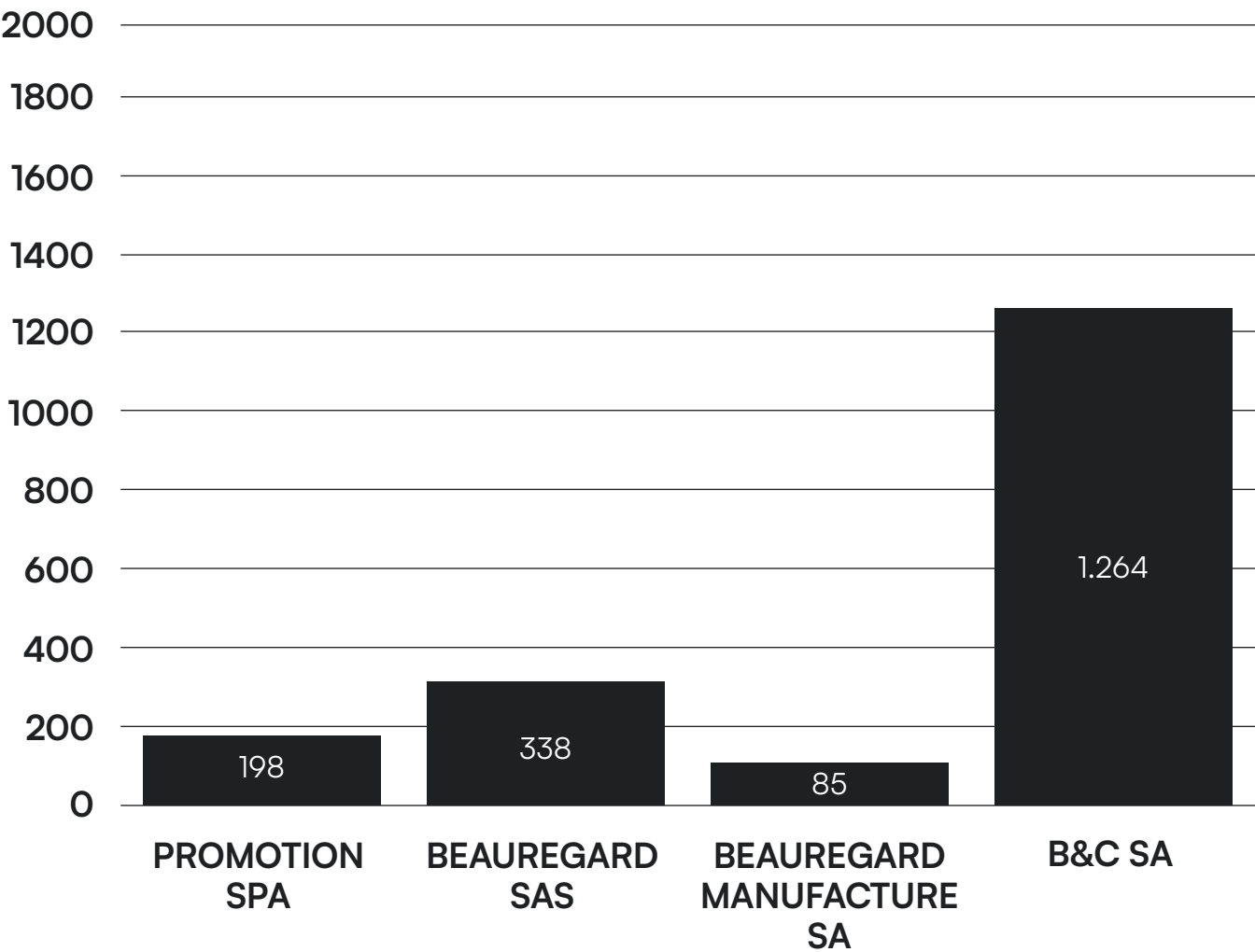
Investing in training is a key pillar for enhancing productivity and developing human capital, as it helps to shape qualified professional workers ready to support corporate growth and strategy. Refresher courses were organized during 2023, continuing the work done in previous years. Permanent training is essential to keep up with new technologies and market trends, as it improves staff skills and productivity. This has proven to be a good investment both for the professional success of employees and for the improvement of the company’s overall performance.

Our company has a long tradition of training courses focused on crucial issues, such as occupational safety and the appropriate use of technology. Moreover, we are always attentive to new market trends and provide courses to ensure that our staff are always up to date with the latest developments.

We believe that communication is crucial to the success of the company. For this reason, we also provide language courses to break down communication barriers within the company.

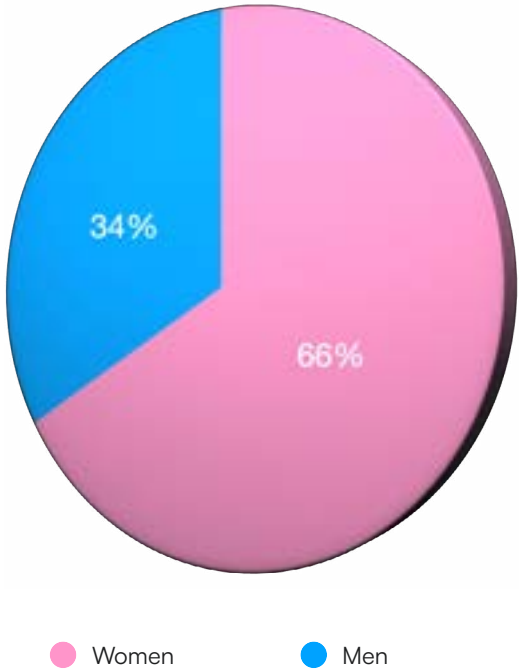
The Group’s training courses are designed to ensure that staff acquire the skills needed to contribute significantly to corporate success. The goal of participating in training courses is to promote a safe, efficient and technologically advanced work environment.

COMPANY	MAN HOURS	WOMAN HOURS	TOTAL
Promotion Spa	56	142	198
Beauregard SAS	128	210	338
Beauregard Manufacture SA	30	55	85
B&C SA	423	841	1,264
Totale Gruppo	637	1,248	1,885



GENDER	TOTAL TRAINING HOURS
Men	637
Women	1,248

TOTAL TRAINING HOURS





# Health and Safety of Employees and Collaborators

## Worker safety

Promotion Group believes it is essential to protect the mental and physical health of its employees and collaborators. To this end, it is committed to ensuring a safe, healthy and comfortable working environment in compliance with applicable health and safety legislation. The Group has adopted an approach that involves assigning the responsibility for occupational safety issues to the competent company units. To ensure uninterrupted monitoring and oversight, occupational safety management has been structured according to a system of powers that assigns organizational disposal powers consistently.

One of the main tasks of Senior Management is to offer tips for improvement regarding the management of occupational health and safety.

The **Head of the Prevention and Protection Service** (Responsabile del Servizio di Prevenzione e Protezione, RSPP) has several duties, including:

- 1

**Identifying risk factors**  
This officer must identify the risk factors found in the workplace, such as hazardous substances, unsafe machinery, or situations that may cause accidents.
- 2

**Assessing risks and identifying preventive and protective safety measures and systems for the monitoring of such measures**  
This officer must assess the identified risks and propose the necessary measures to ensure worker safety. Such measures may be preventive or protective and must be monitored regularly to ensure their effectiveness.
- 3

**Proposing educational and training programs for workers**  
This officer must develop training and educational programs for workers to raise their awareness of the risks found within the workplace and the safety measures adopted to prevent them.

The **Company's Senior Management's** tasks include:

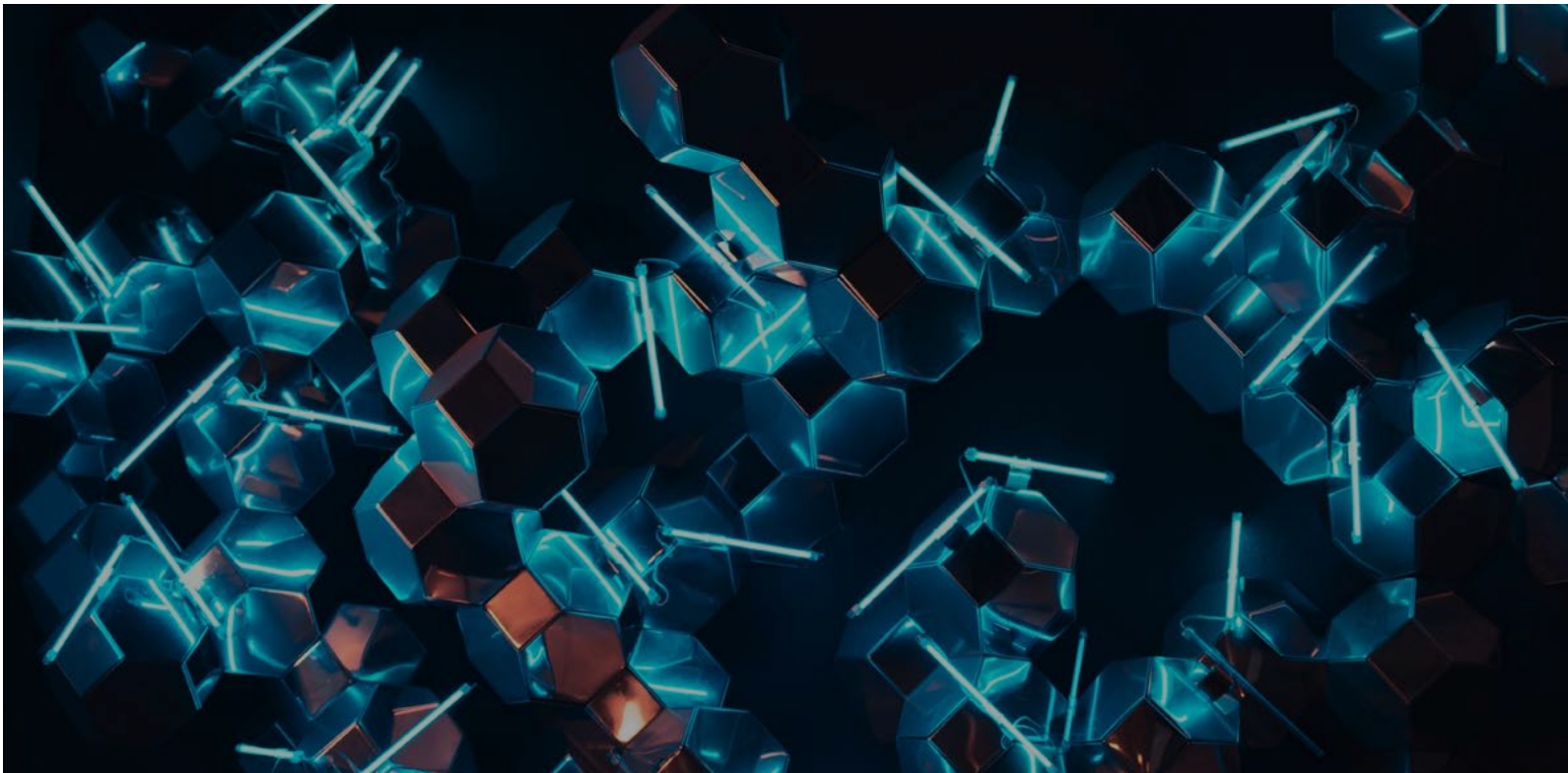
- 1

**Providing cooperation for risk assessment activities**  
Senior Management have the task of collaborating with the Prevention and Protection Service in order to identify any risks within the work environment and adopt the necessary measures to prevent or minimize them.
- 2

**Planning and conducting health surveillance**  
Senior Management have the task of planning and carrying out the necessary health checks to verify the workers' fitness for a specific job.
- 3

**Informing the company that a worker may be employed for a specific job**  
Senior Management must provide the company with the information necessary to ensure that workers are appropriately employed according to their abilities and skills.
- 4

**Inspecting work environments to verify and assess their suitability for the workers' health and physical and mental integrity**  
Senior Management have the task of verifying and assessing the suitability of work environments for the workers' health and physical and mental integrity. In particular, Company Management must verify that the work environments comply with applicable regulations on occupational health and safety.



## Potential risks associated with work activities at the premises of Promotion Group

Promotion Group places the utmost importance on the safety and well-being of its workers. In order to identify and mitigate potential risks associated with work activities, we have implemented prevention and protection measures. The main risks identified include:

### Ergonomic Risk

Injuries may be caused by incorrect postures or prolonged physical efforts.

Prevention measures: to prevent these injuries, workers should be trained on the correct use of tools and equipment, and ergonomic workstations should be set up. This may help reduce muscle tension and prevent posture-related injuries.

### Chemical Risk

During the work process, workers may be exposed to hazardous chemicals.

Prevention Measures: to prevent exposure to these substances, workers are required to use personal protective equipment (PPE) and follow the correct protocols for handling and storing chemicals. Moreover, workers should receive adequate training on risks associated with chemicals and methods to prevent exposure.

### Rischio da Rumore

L'ambiente di lavoro può presentare livelli di rumore elevati, che possono causare effetti negativi sulla salute dei lavoratori.

Misure di Prevenzione: per prevenire i rischi derivanti dall'esposizione al rumore, è necessario utilizzare le protezioni auricolari per i lavoratori e limitare le ore di esposizione al rumore. In questo modo, si può ridurre il rischio di malattie professionali come l'ipoacusia da rumore.

### Noise Risk

The work environment may contain high noise levels, which could cause adverse effects for the workers' health.

Prevention Measures: to prevent any risks arising from exposure to noise, workers should use ear protection and limit the hours of exposure to noise. In this way, the risk of occupational diseases such as noise-induced hearing loss could be reduced.

### Fire Risk

Stress may be caused by excessive workload or organizational factors.

Some measures that could be taken to ensure a healthy work environment are: ensuring work-life balance, providing a comfortable and safe environment, promoting communication and collaboration among employees, providing counselling and psychological support, etc.

Our company is committed to constantly monitoring risks, updating and implementing new preventive measures when necessary.

The safety of our employees is a top priority and we work tirelessly to ensure a safe and healthy work environment.

## Occupational health and safety

Growth projects are closely linked to the well-being of our people. Aware of this, we protect their health and safety, promote a balance between professional and private life and provide training opportunities in the workplace. Promotion Group believes that the health and safety of its staff is highly important. In order to manage it in the best possible way, the company has adopted a system of rules and procedures based on the best international standards. The objective of this system is to minimize accidents in the workplace and ensure compliance with national and EU laws, regulations and directives.





# *The Quality System of Promotion Group*

Promotion Group is committed to maintaining high standards of quality, safety and sustainability in all its operations. The company has adopted stringent environmental policies and measures aimed at minimizing the impact of its operations on the environment, thus contributing to the responsible management of resources. The company's waste management policy is respectful of the environment and follows disposal and recycling practices compliant with applicable environmental regulations.

In the area of safety, the company has implemented actions in line with the regulations of the (Italian) Consolidated Law on occupational safety, ensuring safe conditions for employees, collaborators and third parties. The outcome of this focus on safety is reflected in the low rate of work-related accidents being recorded and in the absence of serious injuries or deaths. Promotion Group has never been the recipient of complaints concerning occupational diseases or harassment, which testifies to its healthy and respectful working environment.

The company has obtained important certifications, such as membership in the Responsible Jewellery Council (RJC) and possession of the Cop and CoC certifications. The ISO 9001 certification should be added to these, confirming the company's commitment to maintaining high quality standards. In addition to compliance with regulations, Promotion Group constantly invests in technological innovation. The company has developed research and development projects focused on advanced technologies, such as laser, 3D printing of precious materials and use of anthropomorphic robots. During financial year 2023, it incurred eligible expenses for these projects, benefiting from the Tax Credit for research, development, technological innovation and design. These efforts are aimed at strengthening the company's competitiveness and generating positive economic impacts.

A central element of the success of Promotion Group is the laboratory located in Altavilla Vicentina. This laboratory represents the beating heart of the company's research, development and quality control activities for bracelets, mainly produced in steel, titanium and precious metals. The laboratory conducts extensive tests on basic materials, components and assemblies to ensure that each product meets the required quality standards.

The research and development department is constantly engaged in studying and experimenting with new materials and technologies. The goal is to continuously innovate, introducing advanced solutions that may improve the performance and reliability of the company's products, while maintaining their elegant and functional design.

Product quality is guaranteed by rigorous controls, which include chemical and physical tests on the materials and durability tests to evaluate the resistance of the bracelets in different conditions. The laboratory also develops and optimizes production processes, working closely with the company's production departments and suppliers to improve efficiency, reduce costs and maintain high standards.

Before being released to the market, all new models undergo functional tests to ensure they meet the standards of everyday use and are safe for consumers. Among the most important tests are environmental tests, which evaluate the product's resistance to factors such as temperature, humidity and corrosion, ensuring that the materials maintain their characteristics even in extreme conditions. In addition to company activities, the Promotion Group laboratory collaborates with research centres for the development of new materials and technologies. These collaborations allow scientific discoveries to be transferred directly into production, giving the company a competitive advantage and allowing it to create innovative and high-quality products.





# Know-How, Our Resource

Once the most suitable construction process has been defined, Promotion Group relies on several corporate production sites or third party entities distributed throughout the world, each with its own equipment and capabilities. For this reason, Promotion Group can guarantee an optimal production flow and a good quality-to-price ratio, as well as compliance with the desired origin, total transparency and perfectly traceable routing. The goal is to create a finished product that best suits the specific needs of each customer.



### *The ROHS Standard*

On the release of heavy metals in nature, such as mercury and cadmium.

### *The EN1811 Standard*

Regarding the nickel release rate, the company uses suitable materials and has also revised its production process.



### *REACH*

This concerns the recording, evaluation and authorization of chemical substances at our various production sites.



### *The Responsible Jewelry Council*

#### *RJC – COP – COC*

This attests to the company’s good practices in regard of gold or diamond supply, from mine to distribution, ensuring traceability throughout the flow.



### *UNI EN ISO 9001:2015*

Promotion SpA operates in compliance with UNI EN ISO 9001:2015, an international standard that specifies the requirements for a Management System.



### *The Green Rooster*

The Communauté du Coq Vert, initiated by Bpifrance in partnership with ADEME and the Ministry of Ecological Transition, unites Companies who are committed to driving the ecological and energy transition. As a member of this community, Beauregard SAS reinforces its dedication to sustainable and responsible development.

# Charitable Grants and Social Commitment of Promotion Group

Promotion Group has always recognized the importance of its role in society, undertaking the commitment to actively supporting various organizations and humanitarian initiatives. Over the years, the company has been strengthening its ethical commitment, promoting tangible actions and making targeted donations to support causes of great social relevance. We are deeply proud to have contributed to improving the quality of life of many people and to have supported projects that have generated a tangible impact on the community.

During 2023, we continued to support relevant causes both nationally and internationally. Among the initiatives we are particularly proud of, the support offered to projects such as EMO-CASA ETS, an association committed to the fight against leukaemia and other malignant blood diseases through clinical research and home therapy, stands out. We have also renewed our commitment to the fight against tumours, with a donation to ANVOLT, the National Association of Volunteers for the fight against cancer.

Another pivotal moment was our support for the Italian Red Cross in relief efforts following the earthquake in Emilia Romagna, an emergency that touched us deeply. We supported the Swiss city of La Chaux-de-Fonds, which was struck by a devastating tornado, underlining our commitment to responding promptly to emergencies.

In addition to these emergency interventions, Promotion Group has been supporting various local solidarity and development initiatives. These included the purchase of UNICEF Christmas cards to support children in difficulty. We also sponsored several sports associations, such as Football Club Sagne and PLUSPORT Sport Handicap, showing a constant commitment to social inclusion through sport. On a cultural level, our contribution has included events such as the Le Chant du Gros Festival and solidarity initiatives for the benefit of the Association Des Soleils pour Princesse Mimi.

Our support has also extended to France, with donations to Harmonie de Paulhaguet and local firefighters, confirming our interest in supporting not only emergencies, but also communities through small actions that improve daily life. The goal of Promotion Group is not only to be a successful company, but also to be a company that brings concrete benefits to society, in line

with the values of solidarity, sustainability and social responsibility. We continue to believe that every gesture of solidarity, whether large or small, can contribute to building a better world. Our hope is that this commitment will be a source of inspiration for other enterprises, trusting that, together, we can create a more just and supportive future for all.

*Comune la Chaux-de-Fonds*



**Croce Rossa Italiana**





# *Strategic Partnership for Sustainability: Promotion Group and Treesition*

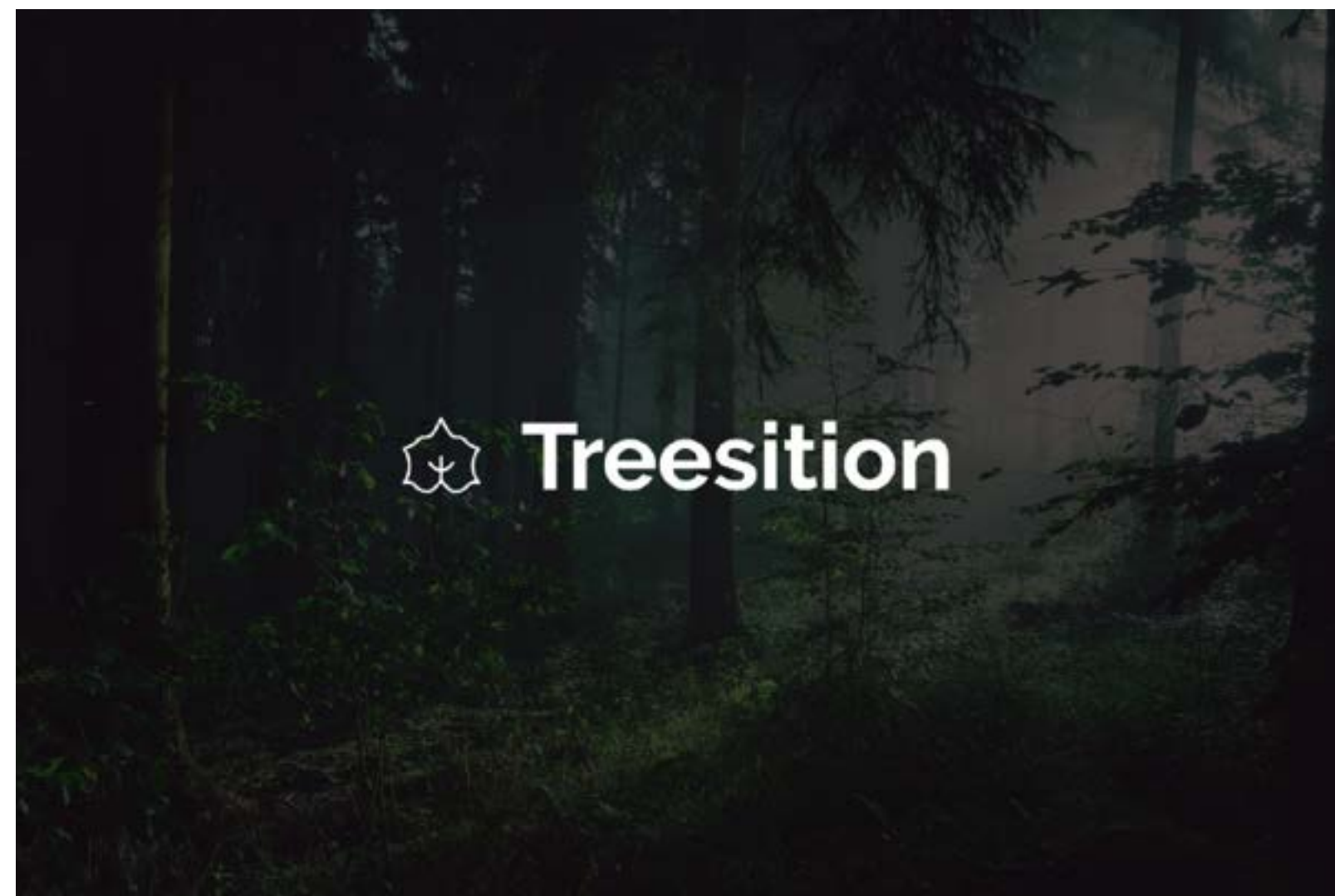
As part of our ongoing commitment to environmental sustainability and corporate social responsibility, Promotion Group has entered into an exciting collaboration with Treesition, an innovative startup specializing in the sustainable cultivation of Paulownia. This strategic partnership aims to significantly reduce our carbon footprint, support sustainable agriculture, generate a positive and measurable environmental impact, and actively involve our employees and stakeholders in concrete environmental initiatives.

The heart of this collaboration is the Treesition project, based on an innovative agroforestry model that uses Paulownia, a tree with extraordinary characteristics. This “super tree” grows rapidly, reaching 20 meters in just 7 years, and has an exceptional capacity to capture CO<sub>2</sub>, up to 55 kg per year per tree. It also produces high-quality wood that can be used in various industrial sectors, thus offering a sustainable solution to the demand for wood.

As its first tangible step, Promotion Group sponsored 10,000 Paulownia trees. The impact of this action is significant: we expect to capture 550 tons of CO<sub>2</sub> per year, equivalent to removing the annual emissions of approximately 120 cars. This action not only contributes directly to the reduction of CO<sub>2</sub> in the atmosphere, but also supports the regeneration of agricultural soils and promotes sustainable wood production, reducing pressure on natural forests.

The impact of this partnership goes beyond environmental issues. We are actively supporting the rural economy and local farmers, creating new economic opportunities in the plantation areas. At the same time, we are diversifying our business portfolio with green assets, showing that sustainability and economic success can go hand in hand.

This partnership with Treesition constitutes a significant step in our sustainability strategy, testifying to Promotion Group’s concrete commitment to responsible and innovative business practices. We are excited about this green journey and will continue to seek and implement solutions that balance economic success with environmental and social responsibility. With every tree planted, we are literally cultivating a more sustainable future for our company, our stakeholders and our planet.



A close-up photograph of green leaves, showing detailed vein patterns, occupies the left half of the page.

# *Environmental Impact*

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Energy consumption  
Water consumption  
Fuel consumption  
Waste management

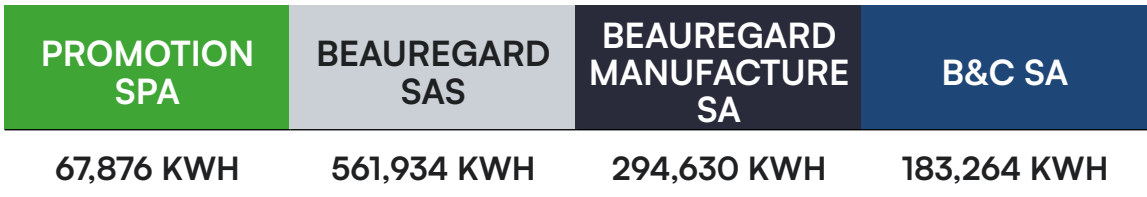


# Energy Consumption

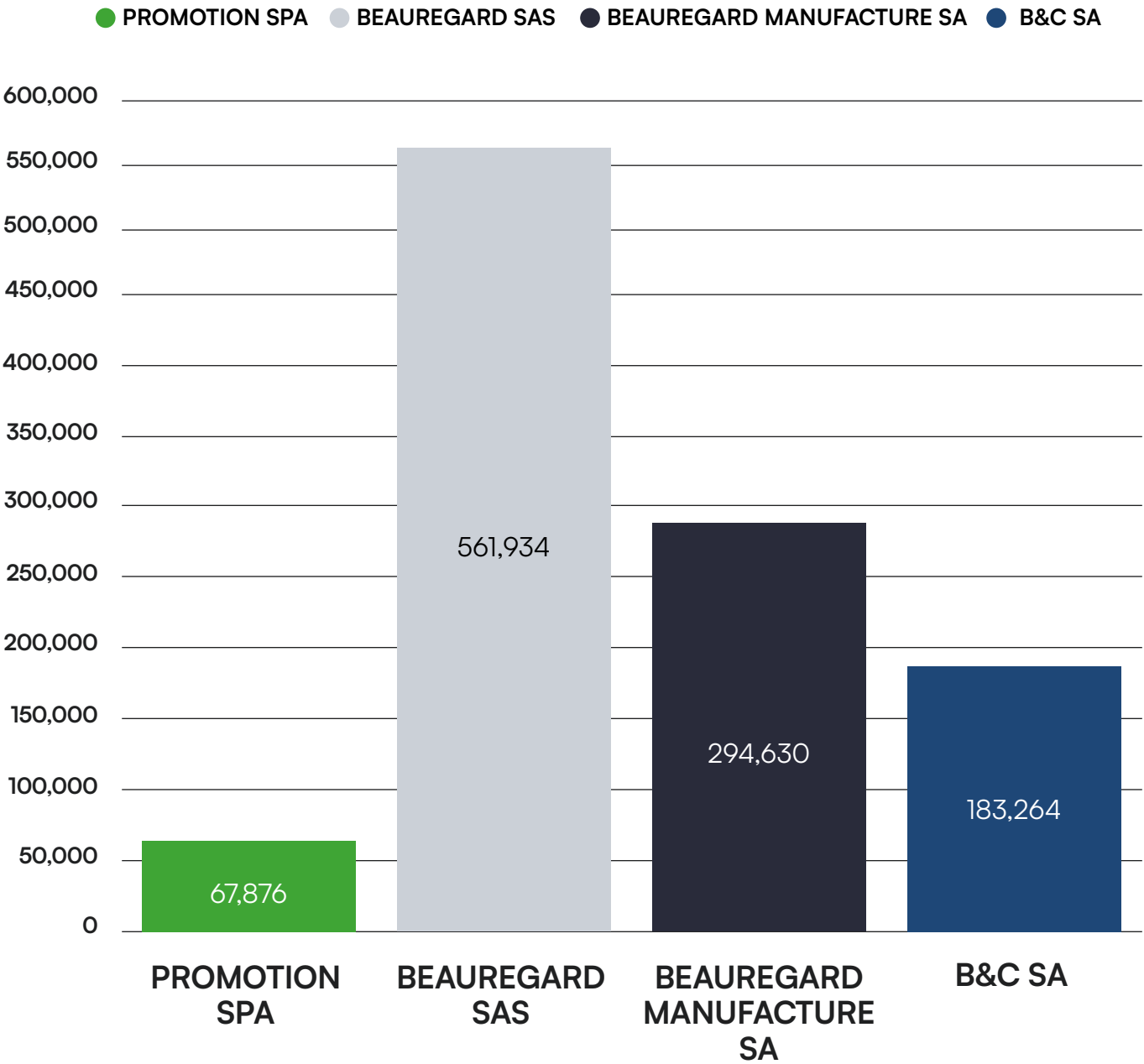
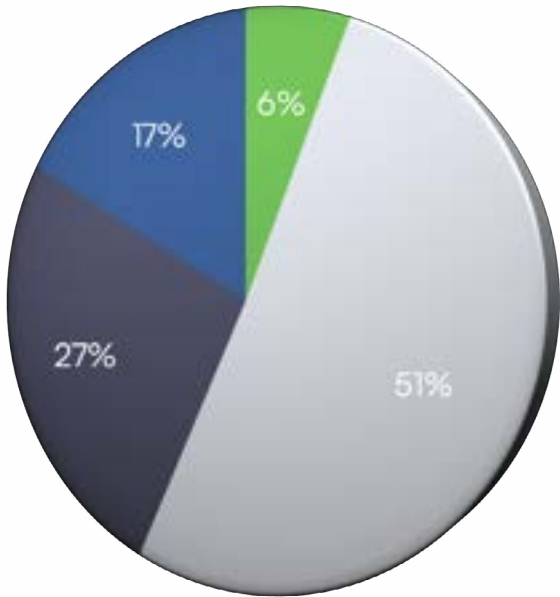
Energy consumption, within Scope 2 of 2023 at the different locations, is given in (kWh):

- Promotion Spa: 67,876 kWh
- Beauregard SAS: 561,934 kWh
- Beauregard Manufacture SA: 294,630 kWh
- B&C SA: 183,264 kWh

These figures emphasize the possibility of continuing to work on energy efficiency at all Promotion Group sites. The Group has shown a strong commitment in this area in the past, considering the reduction of consumption not only an environmental responsibility, but also a strategic pillar of corporate sustainability.



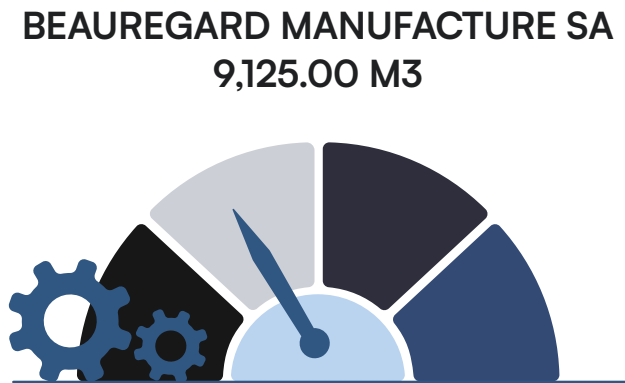
PROMOTION SPA    BEAUREGARD SAS    BEAUREGARD MANUFACTURE SA    B&C SA



# Gas Consumption

Natural gas consumption is currently measured in cubic meters (m³). For the time being, we have recorded 8,062.00 m³ at two of our sites, one in Italy and the other one in Switzerland, with the latter consuming 9,125 m³.

Although constantly monitored, these figures require progressive improvement in the coming years. The aim is to gradually reduce gas consumption until it is completely eliminated, as has already happened at other Group sites, particularly those located in France and Portugal. We are working to implement greener low-emission solutions across all our facilities. This energy transition process is a key commitment to reducing our environmental impact and encouraging the adoption of renewable energy sources.





# Water Consumption

Water consumption in 2023 at Promotion Group sites is measured in cubic meters (m³):

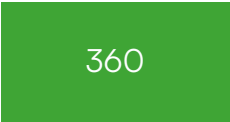
- Promotion Spa: 360.00 m³
- Beauregard SAS: 1,153.00 m³
- Beauregard Manufacture SA: 803.00 m³
- B&C SA: 986.00 m³

These numbers draw attention to a crucial issue for our time: the responsible use of water resources. According to the United Nations, approximately 5 billion people could face a water shortage by 2050, making the commitment of businesses to sustainability even more urgent. The company does not limit itself to monitoring consumption, but is committed to progressively reducing it by adopting innovative solutions and efficient processes. Reducing the use of water is not only an environmental goal, but also a strategic component of the Group’s corporate policy. Every year, work will be done to raise awareness among the Group’s employees, making them an active part of this transition. Through corporate initiatives, the company will promote a culture of sustainability, encouraging virtuous behaviour and greater awareness of the importance of water conservation.

## WATER CONSUMPTION M3

M3	PROMOTION SPA	BEAUREGARD SAS	BEAUREGARD MANUFACTURE SA	B&C SA
Consumption M3	360 M3	1,153 M3	803 M3	986 M3

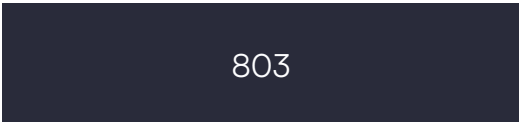
PROMOTION SPA



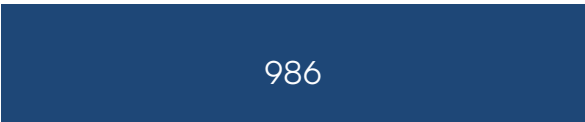
BEAUREGARD SAS



BEAUREGARD MANUFACTURE SA



B&C SA



# Fuel Consumption

Globally, according to the International Energy Agency, transportation is responsible for approximately 24% of total CO2 emissions, which emphasizes the urgent need for tangible action. In this context, Promotion Group has embarked on a journey towards efficiency in diesel consumption, starting with a detailed analysis of its logistics operations. Thanks to a structured approach, the company is able to monitor progress and optimize results. Such data not only guide internal decisions, but also represent a transparency tool for communicating clearly and credibly with stakeholders.

### Scope 1: Direct Fuel Emissions

In 2023, CO2 emissions from diesel and gasoline consumption were significant, especially for the company sites in Italy and Switzerland.

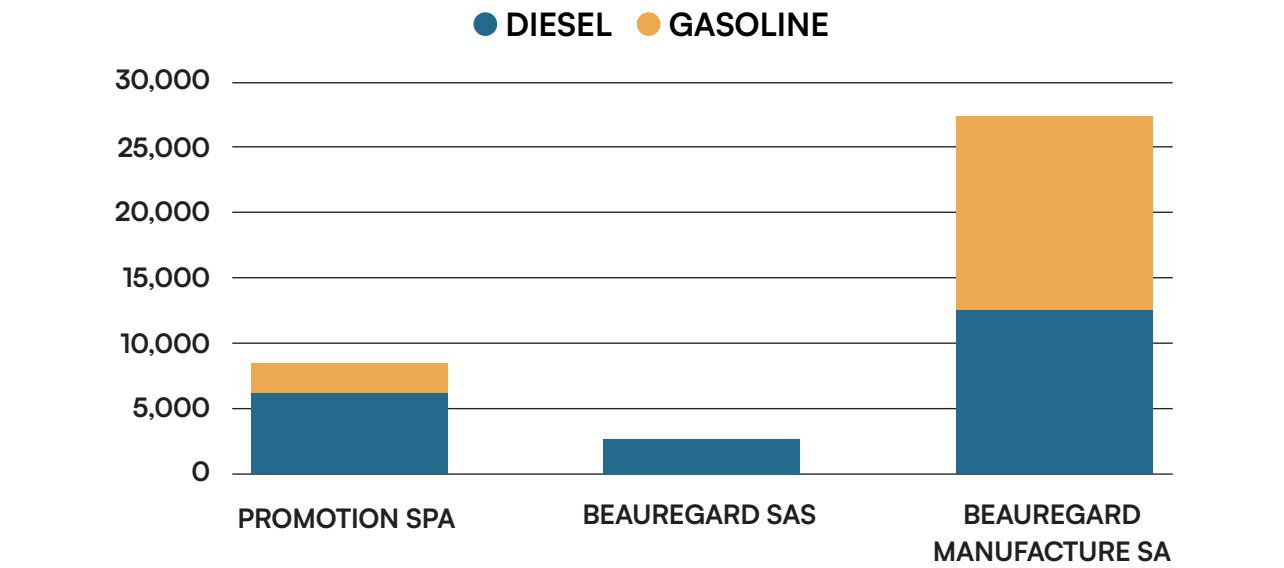
- Italy: 16,800 kg of CO2
- France: 5,038 kg of CO2
- Switzerland: 67,088 kg of CO2

### Scope 3: Transportation and Indirect Emissions Along the Value Chain

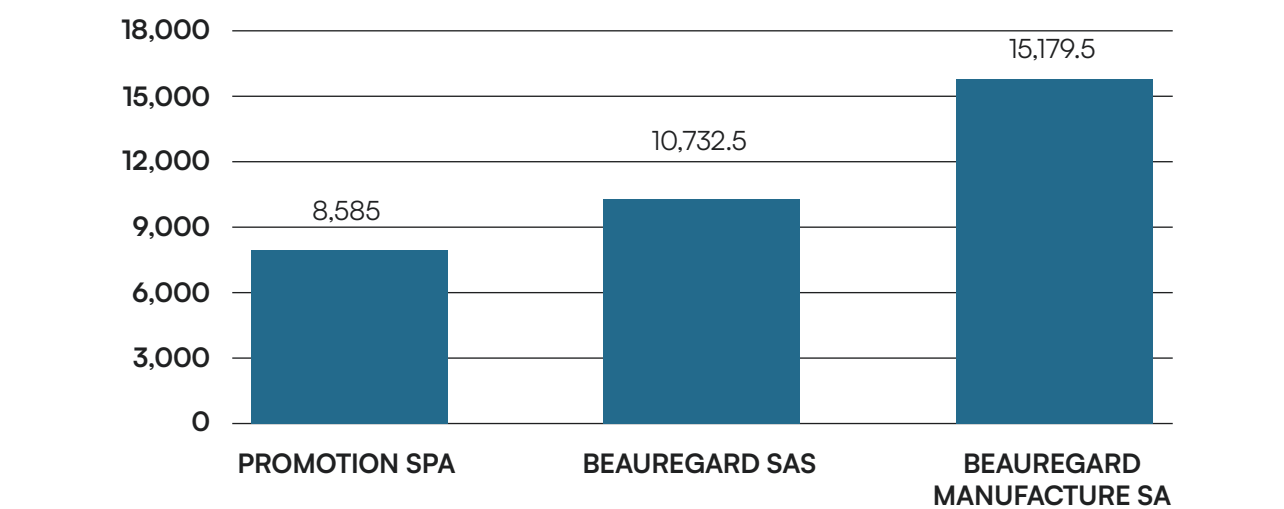
Scope 3 emissions, which include freight transport, are equally significant. With almost 276,000 km travelled by non-company vehicles, emissions associated with road transport were in particular:

- Italy: 17,093 kg of CO2
- Switzerland: 30,229 kg of CO2
- France: 21,375 kg of CO2

INDIRECT CONSUMPTION - LITRES	PROMOTION SPA	BEAUREGARD SAS	BEAUREGARD MANUFACTURE SA
Diesel	5,544	1,880	13,411
Gasoline	836	0	13,821
Total	6,380	1,880	27,232



INDIRECT CONSUMPTION - LITRES	TYPE OF TRASPORT MEANS	KM	KM/L
Promotion Spa	Motor-vehicles	68,664	8,585
Beauregard SAS	Motor-vehicles	85,860	100,732.5
Beauregard Manufacture SA	Motor-vehicles	121,436	15,179.5
TOTAL	Motor-vehicles	275,960	34,495





# Waste Management

For the Promotion Group, waste management is not just an obligation, but a true opportunity for continuous improvement. Between 2021 and 2023, the Group achieved significant results in reducing the use of paper at all its locations. In Italy, for example, consumption of reams of paper fell from 200 in 2021 to 100 in 2023, marking a 50% reduction in just three years. In Switzerland, consumption also fell dramatically from 303 reams in 2022 to 100 in 2023. Overall, the total consumption of reams amounted to 1,768 units between 2021 and 2023, while 884,000 units of 500-sheet packs were used. Although these numbers may seem significant, they represent a progressive and constant reduction, achieved thanks to a targeted strategy and continuous monitoring. The commitment to waste reduction and consumption efficiency strengthens our position as a responsible and innovative company, ready to build an increasingly sustainable future.

COMPANY	PAPER CONSUMPTION	2021	2022	2023	TOT
Promotion Spa	Reams	200	170	100	470
	500-sheet packs	100,000	85,000	50,000	235,000
Beauregard SAS	Reams	240	240	240	720
	500-sheet packs	120,000	120,000	120,000	360,000
Beauregard Manufacture SA	Reams	75	303	100	478
	500-sheet packs	37,500	151,500	50,000	239,000
B&C SA	Reams	34	33	33	100
	500-sheet packs	17,00	16,500	16,500	50,000
TOTAL	Reams	549	746	473	1.768
	500-sheet packs	274,500	373,000	236,500	884,000

# GRI Standards

<b>GRI 1: FOUNDATION 2021</b>	<b>12</b>
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<b>GRI 2: GENERAL DISCLOSURES 2021</b>	<b>12</b>
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<b>THE ORGANIZATION AND ITS REPORTING PRACTICES</b>
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<b>12-14</b>	2-1 Organizational details
<b>12-17</b>	2-2 Entities included in the organization’s sustainability reporting
<b>12</b>	2-3 Reporting period, frequency and contact point
<b>-</b>	2-4 Review of information
<b>22-26</b>	2-6 Activities, value chain and other business relationships (activities, products, services and markets served, supply chain, etc.)
<b>70-74</b>	2-7 Employees (number of employees by employment contract — permanent, temporary, full-time, part-time — breakdown by gender and by region)
<b>70-74</b>	2-8 Workers who are not employees (number of workers who are not employees and whose work is controlled by the organization, specifying the most common types of contractual relationship and work they perform)
<b>55-58</b>	2-9 Governance structure and composition (including committees of the highest governance body, executive and non-executive members, etc.)
<b>58</b>	2-10 Nomination and selection of the highest governance body (describing the criteria used, independence, competencies, etc.)

<b>58</b>	2-11 Chair of the highest governance body (report whether the Chair is also a senior executive, explain their function within the organization’s management, the reasons for this arrangement, and how conflicts of interest are prevented and mitigated)
<b>58</b>	2-12 Role of the highest governance body in overseeing the management of impacts (including the roles of the highest governance body and of senior executives in developing, approving, and updating the organization’s strategies, policies, and goals related to sustainable development, etc.)
<b>58</b>	2-13 Delegation of responsibility for managing impacts (how the highest governance body delegates responsibility for managing the organization’s impacts on the economy, environment, and people, etc.)
<b>58</b>	2-14 Role of the highest governance body in sustainability reporting
<b>58</b>	2-15 Conflicts of interest (describe the processes for the highest governance body to ensure that conflicts of interest are prevented and mitigated, etc.)
<b>-</b>	2-16 Communication of critical concerns (whether and how critical concerns are communicated to the highest governance body, etc.)
<b>-</b>	2-17 Collective knowledge of the highest governance body (measures taken to advance the collective knowledge and experience on sustainable development)
<b>-</b>	2-18 Evaluation of the performance of the highest governance body (in overseeing the management of the organization’s impacts on the economy, environment, and people)
<b>-</b>	2-19 Remuneration policies (for members of the highest governance body and senior executives)
<b>-</b>	2-20 Process to determine remuneration
<b>-</b>	2-21 Annual total compensation ratio (ratio of the annual total compensation for the organization’s highest-paid individual to the median annual total compensation for all employees (excluding the highest-paid individual; ratio of the percentage increase in annual totalcompensation



for the organization’s highest-paid individual to the median percentage increase in annual total compensation for all employees (excluding the highest-paid individual)

STRATEGY, POLICIES AND PRACTICES

12	2-22 Statement on sustainable development strategy (statement from the highest governance body or most senior executive of the organization about the relevance of sustainable development to the organization and its strategy for contributing to sustainable development)
65	2-23 Policy commitments
62-65	2-24 Embedding policy commitments
76-79	2-25 Processes to remediate negative impacts i
76-79	2-26 Mechanisms for seeking advice and raising concerns (description of the mechanisms for individuals to seek advice on implementing the organization’s policies and practices for responsible business conduct; raise concerns about the organization’s business conduct)
-	2-27 Compliance with laws and regulations (including total number of significant instances of non-compliance with laws and regulations; total number and monetary value of fines for instances of non-compliance)
-	2-28 Membership in associations (industry associations or other associations in which the organization participates in a significant role)

STAKEHOLDER ENGAGEMENT

30	2-29 Approach to stakeholder engagement (including a description of the categories of stakeholders the organization engages with, and how they are identified; the purpose of the stakeholder engagement and how the organization seeks to ensure engagement with stakeholders)
-	2-30 Collective bargaining agreements (report the percentage of employees covered by collective bargaining agreements; report how working conditions for workers not covered by collective bargaining agreements are determined)

GRI 3: 2021 MATERIAL TOPICS

22	3-1 Process to determine material topics
46-52	3-2 List of material topics

SPECIFIC STANDARDS AND MATERIAL DISCLOSURES

GRI 201: ECONOMIC PERFORMANCE 2016

-	201-1 Direct economic value generated and distributed (including revenues, operating costs, employee wages and benefits, payments to the Public Administration and community investments)
62	201-2 Financial implications and other risks and opportunities due to climate change
68-69	201-3 Defined benefit plan obligations and other retirement plans
86	201-4 Financial assistance received from government

GRI 203: INDIRECT ECONOMIC IMPACTS 2016

86-88	203-1 Infrastructure investments and services supported (report the extent of development of significant infrastructure investments and services supported; current or expected impacts on local economies, including positive and negative impacts; whether these investments and services are commercial, in-kind, or pro bono engagements.)
86-88	203-2 Significant indirect economic impacts (provide examples of significant identified indirect economic impacts of the organization, including positive and negative impacts, etc.)

GRI 204:  
PROCUREMENT PRACTICES 2016

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- 204-1 Proportion of spending on local suppliers (in relation to the most significant locations of operation)

GRI 205:  
ANTI-CORRUPTION 2016

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- 205-1 Operations assessed for risks related to corruption (report the number and percentage of operations assessed for risks related to corruption)
- 205-2 Communication and training about anti-corruption policies and procedures (report the number and percentage of governance body members and employees that the organization’s anti-corruption policies and procedures have been communicated to)
- 205-3 Confirmed incidents of corruption and actions taken (report the total number and nature of confirmed incidents of corruption, etc.)

GRI 206:  
ANTI-COMPETITIVE BEHAVIOUR 2016

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- 206-1 Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices (number of legal actions pending or completed during the reporting period regarding anti-competitive behaviour and violations of anti-trust and monopoly legislation)

GRI 301:  
MATERIALS 2016

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- 301-1 Materials used by weight or volume (materials that are used to produce and package the organization’s primary products and services broken down by non-renewable and renewable materials used)
- 301-2 Recycled input materials used

GRI 302:  
ENERGY 2016

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- 92-93 302-1 Energy consumption within the organization
- 92-93 302-2 Energy consumption outside of the organization
- 92-93 302-3 Energy intensity
- 92-93 302-4 Reduction of energy consumption
- 92-93 302-5 Reductions in energy requirements of products and services

GRI 303:  
WATER AND EFFLUENTS 2018

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- 96-97 303-1 Interactions with water as a shared resource
- 96-97 303-2 Management of water discharge-related impacts
- 96-97 303-3 Water withdrawal
- 96-97 303-4 Water discharge
- 96-97 303-5 Water consumption

GRI 304:  
BIODIVERSITY 2016

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- 304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas
- 88-89 304-2 Significant impacts of activities, products and services on biodiversity
- 88-89 304-3 Habitats protected or restored
- 304-4 National conservation list species with habitats in areas affected by operations



GRI 305:  
EMISSIONS 2016

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94                    305-1 Greenhouse gas emissions

GRI 306:  
EFFLUENTS AND WASTE 2016

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96-97                306-2 Waste by type and disposal method

GRI 306:  
WASTE 2020

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100                   306-1 Waste generation and significant waste-related impacts

100                   306-2 Management of significant waste-related impacts

100                   306-3 Waste generated

100                   306-4 Waste diverted from disposal

100                   306-5 Waste directed to disposal

GRI 308:  
SUPPLIER ENVIRONMENTAL ASSESSMENT 2016

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-                      308-1 New suppliers that were screened using environmental criteria  
(specify percentage)

-                      308-2 Negative environmental impacts in the supply chain and actions taken

GRI 401:  
EMPLOYMENT 2016

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70-79                401-1 New employee hires and employee turnover (report the total number  
and turnover rate of employees and new employees, by age group, gender  
and region)

70-79                401-2 Benefits provided to full-time employees that are not provided to  
temporary or part-time employees

70-79                401-3 Parental leave (including the return-to-work and retention rates of  
employees that took parental leave, by gender)

GRI 402:  
LABOUR / MANAGEMENT RELATIONS 2016

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-                      402-1 Minimum notice periods regarding operational changes (specifying  
whether such conditions are specified in collective bargaining agreements)

GRI 403:  
OCCUPATIONAL HEALTH AND SAFETY 2018

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70-79                403-1 Occupational health and safety management system

70-79                403-2 Hazard identification, risk assessment, and incident investigation

70-79                403-3 Occupational health services

70-79                403-4 Worker participation, consultation, and communication on  
occupational health and safety

72-74                403-5 Worker training on occupational health and safety

76-79                403-6 Promotion of worker health

-                      403-8 Workers covered by an occupational health and safety management  
system

-                      403-9 Work-related injuries

-                      403-10 Work-related ill health

GRI 404:  
TRAINING AND EDUCATION 2016

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76-78	404-1 Average hours of training per year per employee
76-78	404-2 Programs for upgrading employee skills and transition assistance programs
-	404-3 Ratio of basic salary and remuneration of women to men (for each employee category)

GRI 405:  
DIVERSITY AND EQUAL OPPORTUNITY 2016

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56-57	405-1 Diversity of governance bodies and employees (reporting the percentage of individuals within the organization’s governance bodies and employees by gender, age group and other indicators of diversity where relevant)
-	405-2 Rapporto tra salario di base e retribuzione delle donne rispetto agli uomini (per ciascuna categoria di dipendenti)

GRI 406:  
NON-DISCRIMINATION 2016

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-	406-1 Incidents of discrimination and corrective actions taken
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GRI 413:  
LOCAL COMMUNITIES 2016

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86-89	413-1 Operations with local community engagement, impact assessments, and development programs (specify the percentage)
86-89	413-2 Operations with significant actual and potential negative impacts on local communities

GRI 414:  
SUPPLIER SOCIAL ASSESSMENT 2016

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-	414-1 New suppliers that were screened using social criteria (specify percentage)
-	414-2 Negative social impacts in the supply chain and actions taken

GRI 416:  
CUSTOMER HEALTH AND SAFETY 2016

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76-79	416-1 Assessment of the health and safety impacts of product and service categories (report the percentage of significant product and service categories for which impacts are assessed)
76-79	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services (specifying whether they resulted in a penalty, fine or warning)

GRI 417:  
MARKETING AND LABELLING 2016

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84	417-1 Requirements for product and service information and labelling
-	417-2 Incidents of non-compliance concerning product and service information and labelling (specifying whether they resulted in a penalty, fine or warning)
-	417-3 Incidents of non-compliance concerning marketing communications (specifying whether they resulted in a penalty, fine or warning)

GRI 418:  
CUSTOMER PRIVACY 2016

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65	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data (received from outside parties and substantiated by the organization or by regulatory bodies)
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# Promotion Group



Promotion SpA



BEAUREGARD MANUFACTURE SA



BEAUREGARD SAS



B&C S.A.