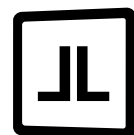




COMMITMENT REPORT 2025

FROJAL



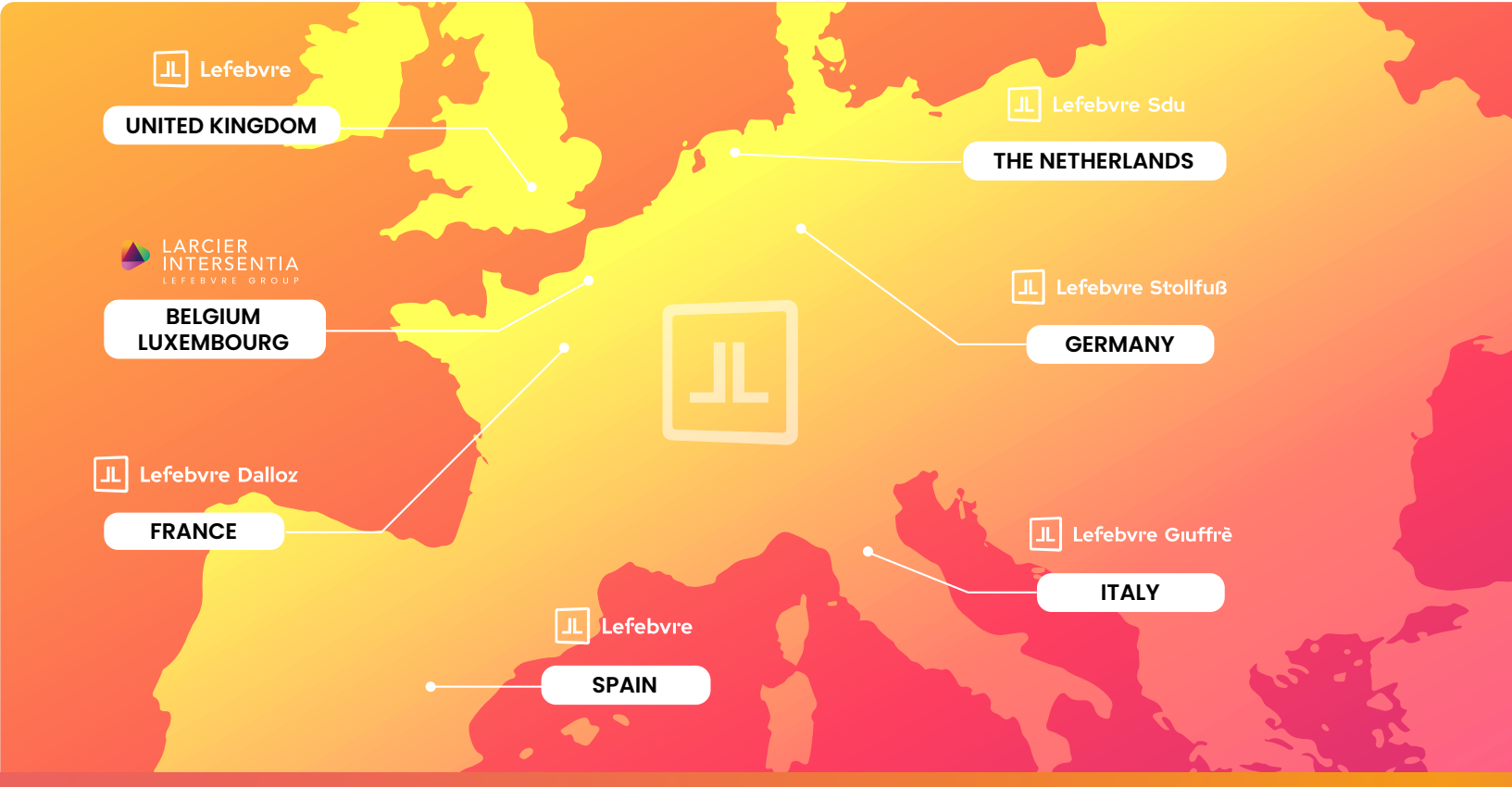
Lefebvre



1

THE GROUP AND ITS SUBSIDIARIES





WHAT WE DO

ABOUT US

FROJAL is a family holding company owned by the descendants of Francis Lefebvre. **Lefebvre Sarrut** is a European group, 77% of the capital of which is held exclusively by members of the **Lefebvre family** via their FROJAL holding, and 23% directly or indirectly by the **Sarrut family** via their Sarrut holding.

The Lefebvre family has developed the heritage of its ancestor, Francis Lefebvre, who in the 19th century, together with his sons, Roger and Jacques, formed the benchmark publishing and training group in the field of tax and accounting law. The Sarrut family inherited the legacy created by Lise and Jean Sarrut, who founded Editions Législatives in 1947, establishing themselves as key players in the field of social law.

Born from the alliance of these two families, our Group has grown steadily thanks to a series of acquisitions in Europe. We are established in the major European countries: Germany, Belgium, France, Italy, Luxembourg, Spain, the Netherlands and the United Kingdom. We provide comprehensive solutions to businesses (HR, Finance, Legal, Compliance), regulated professions (notaries, chartered accountants, lawyers, etc.) and the public sector in the fields of publishing, training and software. Our core values are based on enabling knowledge in order to build a fairer, more efficient and more sustainable society. In 2025, our Group posted turnover of €563 million and employed 2,459 people.

OUR ENVIRONMENTAL, SOCIAL AND GOVERNANCE (ESG) COMMITMENT

OUR VALUES

Our Group is the leading intermediate-sized company (ETI) in the legal sector in France and Europe. Firmly committed to its business and human values, it is currently one of the leading companies in continental law.



EXCELLENCE

We bring our clients reliable content, high-quality training and innovative software applications.



SHARING

We foster a culture of collaboration and sharing of knowledge with our clients, authors and partners. These exchanges generate ties of trust and drive innovation, which in turn acts as a real growth accelerator.



PROXIMITY

We foster a culture of communication and strong relations. We promote an ecosystem of contribution, comprehension and respect in order to achieve success together and to offer our clients, employees and community a unique experience.

OUR PURPOSE

Our purpose of **enabling knowledge for a fairer, more efficient, and sustainable society** unites employees, clients, families, shareholders, and Group partners daily. We have made clear commitments to the following:



01

Guaranteeing access to the law by widely disseminating reliable legal, tax and regulatory information, working closely with national and European public institutions.



02

Enabling our clients to stay ahead of the curve by constantly anticipating the changes to their business environment and using partnerships and innovation to build the solutions of tomorrow.



03

Identifying and understanding changes in laws and regulations **to enable our clients to remain compliant and use the law as a lever for development and performance.**



04

Creating an inspiring workplace, offering our employees stimulating projects and innovative, collaborative methods to support their personal and professional development.



05

Building a more sustainable world by respecting the environment through cooperation with all our stakeholders.

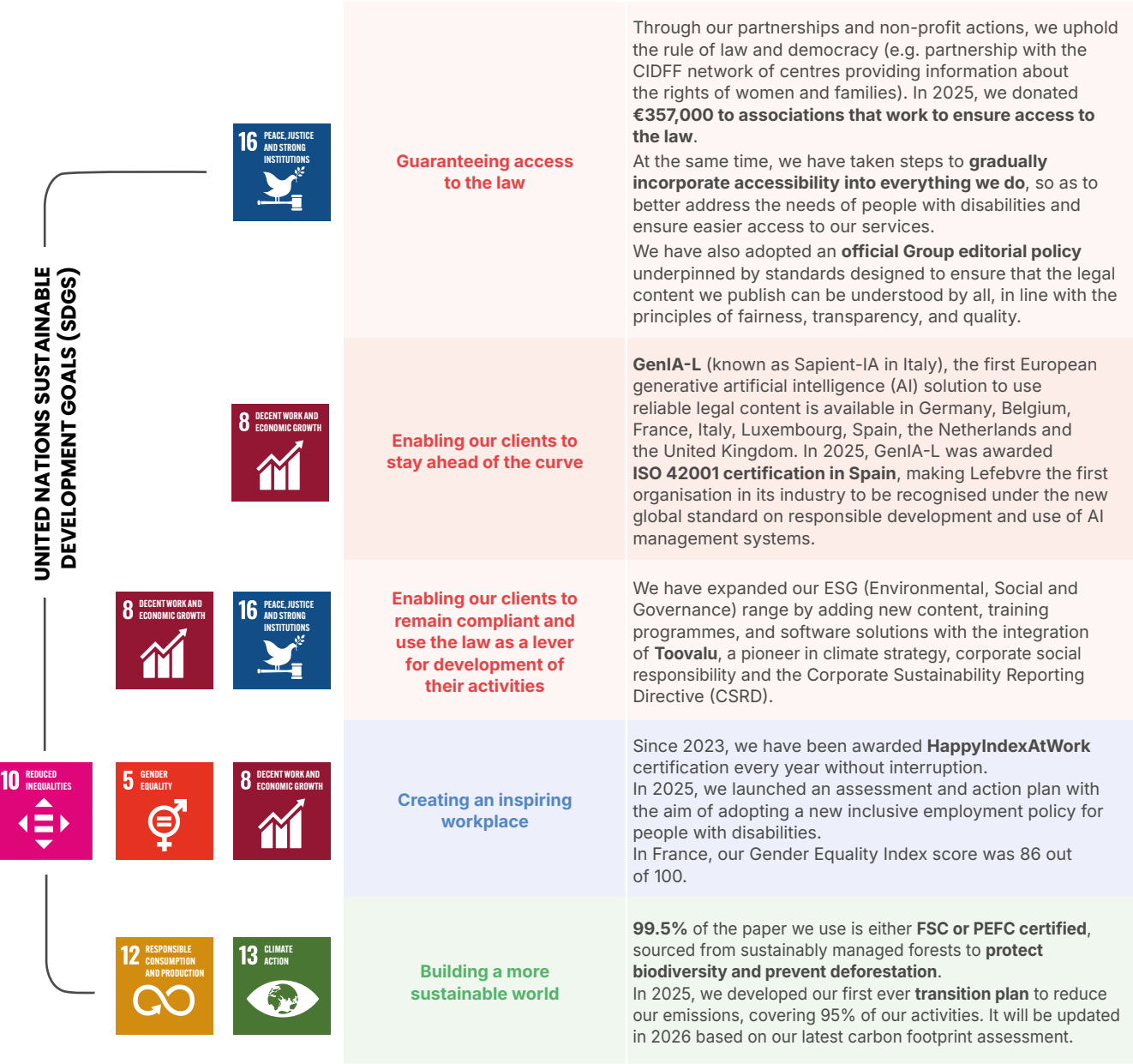
OUR COMMITMENTS

Our Group and its subsidiaries have invested in corporate social responsibility for many years, by means of concrete actions such as the Ethics Charter since 2017, the Security/Privacy/Sapin2/ CSR questionnaire sent to our main suppliers since 2019, integration of our GDPR data into a dedicated management platform since 2019, creation of the Group CSR Department in 2021, formalisation of our purpose in 2022, carbon assessment covering

scopes 1, 2 and 3 since 2022 at Group level, rollout of whistleblowing platforms on a European scale in 2023, formalisation of our environmental and social policies in 2023, ESG awareness training offered to all our employees in 2023-2024, new responsible purchasing charter at European level in 2024, a transition plan established in 2024-2025 covering 95% of our emissions, and formalisation of the Group's Manifesto for Access to the Law and editorial policy in 2025.

UNITED NATIONS GLOBAL COMPACT

To further strengthen our commitment to environmental and societal issues, the Group joined the United Nations Global Compact programme, or Global Compact, on 26 January 2022, and since then has been reporting on its actions in the context of "Communication on Progress".



OUR ISSUES AND STRATEGIC FOCUSES

The Group defined its **purpose** in 2022, an important milestone in its social responsibility trajectory. Since then, we have actively engaged in continuous reflection with our stakeholders in order to give concrete expression to these core values through tangible commitments and actions. This continuous engagement ensures that our core values are properly reflected, taking account of the expectations and needs of all parties concerned.

an analysis of Group risks carried out in December 2022, providing us with an overall integrated view of the risks facing the Group. This proactive approach ensures better understanding of the environmental, social and governance impacts and enables us to take appropriate measures to mitigate them and manage them effectively. It also enabled us to identify a number of opportunities that had not previously been apparent to us.

In 2023, we conducted an **impact analysis (known as the "double materiality analysis")** with our stakeholders to identify and **prioritise the main risks and ESG opportunities** for both the Group and its ecosystem. This process is also based on

In 2025, the **ESG Group Strategy** was therefore structured around five pillars which guide our short and mid-term actions and initiatives (plan 2025-2030):



2

ACCESS TO THE LAW

MAKING THE LAW MORE
COMPREHENSIBLE AND ACCESSIBLE



We are committed to ensuring access to the law, working alongside public actors to uphold the rule of law. Access to the law is a fundamental aspect of a democratic society as it ensures equality before the law and enables every individual to defend or assert their rights and duties. Since its inception, our Group has recognised the paramount importance of this issue and collaborates to ensure that the law is comprehensible and accessible to all while keeping prices competitive for our clients and yet sufficient for the company's profitability.



MAKING THE LAW MORE COMPREHENSIBLE AND ACCESSIBLE

Committed to our stakeholders

In 2025, **we stepped up our ambition** to make the law clearer and more accessible, ensuring everyone is able to use it to assert their rights. One of the main ways we did this was by adopting a **shared editorial policy for all of our organisations across Europe**, designed to meet the needs of our different audiences (professionals, businesses, institutions, and students), whilst maintaining a consistent focus on clarity and reliability. We set high standards: content written and reviewed by experts, a range of formats and levels of detail to suit different readerships, regular updates, a rigorous and ethical editorial line, and the responsible use of artificial intelligence, always with a human in the loop.

In the same spirit of inclusion, **we have accelerated our digital accessibility agenda for people with disabilities**. Following the baseline assessment undertaken in 2024, this year we took this to a new level, with training for product, tech and design teams, phased audits, accessibility criteria incorporated from the earliest stages of project design, and ongoing monitoring based on defined metrics. Our goal is clear: to make accessibility a non-negotiable requirement for our digital services.

Making the law more intelligible and operational

We are accelerating the transformation of access to legal information with **GenIA-L** (known as Sapien-IA in Italy), the first European generative AI solution built on trusted legal content, now available across all our markets. GenIA-L is about much more than just research. It lets our clients carry out all kinds of everyday tasks more efficiently, from analysing and summarising documents and translating, to drafting or structuring arguments for and against. So they can navigate legal issues with greater clarity and confidence.

We have moved beyond the experimental phase: **GenIA-L is now being adopted widely**, becoming a vital cog in the day-to-day work of legal and accounting professionals, and companies too. By combining the power of AI with our high standards of expertise and reliability, we are helping to reshape the legal information sector, **making the law more comprehensible, more accessible, and easier to use for our clients**.

Promoting and explaining the law

Making the law more intelligible means bringing it to life, making it a subject of public debate. That is the thinking behind **"Futurs du Droit et du Chiffre"**, a European programme launched in 2025 to look ahead to the major legal and tax developments set to shape the coming decade. Against a backdrop of systemic crises, rapid technological change – particularly the rise of AI – and growing democratic challenges, the programme draws on our expertise to help build a legal and tax ecosystem that is **fairer, more sustainable, and better prepared for the changes ahead**. Officially announced in Brussels on 25 March 2025, the programme brought together experts and institutions to discuss crucial issues, from European sovereignty and climate impacts to the reliability of legal information, and the evolving relationship between artificial and human intelligence. It was followed by **a multilingual documentary, screened during the nationwide Nuit du Droit event in 2025** (the film is available on YouTube).

This commitment to sharing knowledge is also reflected in our educational initiatives. In Italy, **La Costituzione aperta a tutti** (The Constitution for All), a project run by the Ministry of Education in partnership with our Lefebvre Giuffrè brand, helps teach younger generations about democratic values and institutions through educational workshops centred on the Italian Constitution.

Finally, to help anticipate developments in the law and demonstrate their practical implications, we have teamed up with **Les Jurisnautes**, an innovative initiative that explores major contemporary issues through original mock-trial formats. In 2025, the "Cyber Boss" case examined how putting AI in charge of making decisions raises important questions around governance and accountability.

Helping the most vulnerable members of the community

Because everyone in society should have proper access to the law, **we are continuing to expand our non-profit initiatives** in support of the most vulnerable groups. Across Europe, we support charities and foundations working to break down the barriers that prevent people from accessing accurate legal information and asserting their rights. These include the Fondation Francis Lefebvre (through initiatives such as MAPEmonde), Les Surligneurs (legal fact-checking), La Nuit du Droit, Praktizijns, Résonances Humanitaires, Dàdoris and De Jonge Balie. Since 2024, our strategic partnership with the CIDFF network (*Centres d'Information sur les Droits des Femmes et des Familles*) has helped provide more than 400,000 people each year with information about their rights. In Belgium, we also support Justice-en-ligne.be and Questions-justice.be. In 2025, Lefebvre Sdu launched Sociaal voor Elkaar, an initiative in the Netherlands that makes software licences available at reduced rates for legal professionals assisting vulnerable individuals. Finally, we also allow legal publications to be made available in prisons across a number of European countries via several partnerships.

€357,000
in donations to
associations that work to
ensure access to the law



3

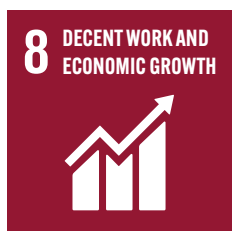
RESPONSIBLE INNOVATION

**ENABLING OUR CLIENTS TO STAY
AHEAD OF THE CURVE**



Throughout its development, our Group has consistently renewed and enhanced its offerings to adapt to the challenges of a changing world, constantly striving for excellence and mutual trust with our clients.

We are committed to adopting artificial intelligence (AI) to enable our clients to stay ahead of the curve in a reliable, secure, ethical and responsible manner.



ENABLING OUR CLIENTS TO STAY AHEAD OF THE CURVE

Our ethical commitment

We rely on a shared ethical framework to guide the way we develop and use AI. Our Group's **Responsible AI Policy**, which applies in every one of the countries where we operate, sets out common principles covering transparency, accountability, respect for fundamental rights, and human oversight.

This commitment is also reflected in the **ongoing awareness and training provided to our staff**, which begins right from the onboarding process in order to ensure that AI is used sensibly, responsibly and in line with our values.

Reliable, secure AI serving our clients

We develop generative AI solutions designed for the high standards of reliability and security expected by legal and accounting professionals. **GenIA-L** (known as Sapient-IA in Italy), the first European generative AI solution built exclusively on verified legal content, is now available in all our markets and **is increasingly used by our clients in their day-to-day work**.

The solution has been developed in accordance with **Security and Privacy by Design** principles, does not use client data to train models, and encourages a **measured and responsible** approach to AI use. In 2025, GenIA-L was awarded ISO 42001 certification in Spain, making Lefebvre the first organisation in its industry to be recognised under the new standard.

Cybersecurity and data protection: non-negotiables

Cybersecurity and data protection are fundamental to the trust placed in us by our clients and stakeholders. **Our IT and business projects are subject to stringent security and compliance requirements**, supported by the widespread adoption of security validation procedures and a continued focus on anticipating regulatory developments, particularly with regard to cybersecurity.

Employee awareness of personal data protection and its importance forms an integral part of this approach, helping to foster a shared culture of compliance and responsibility throughout the Group.

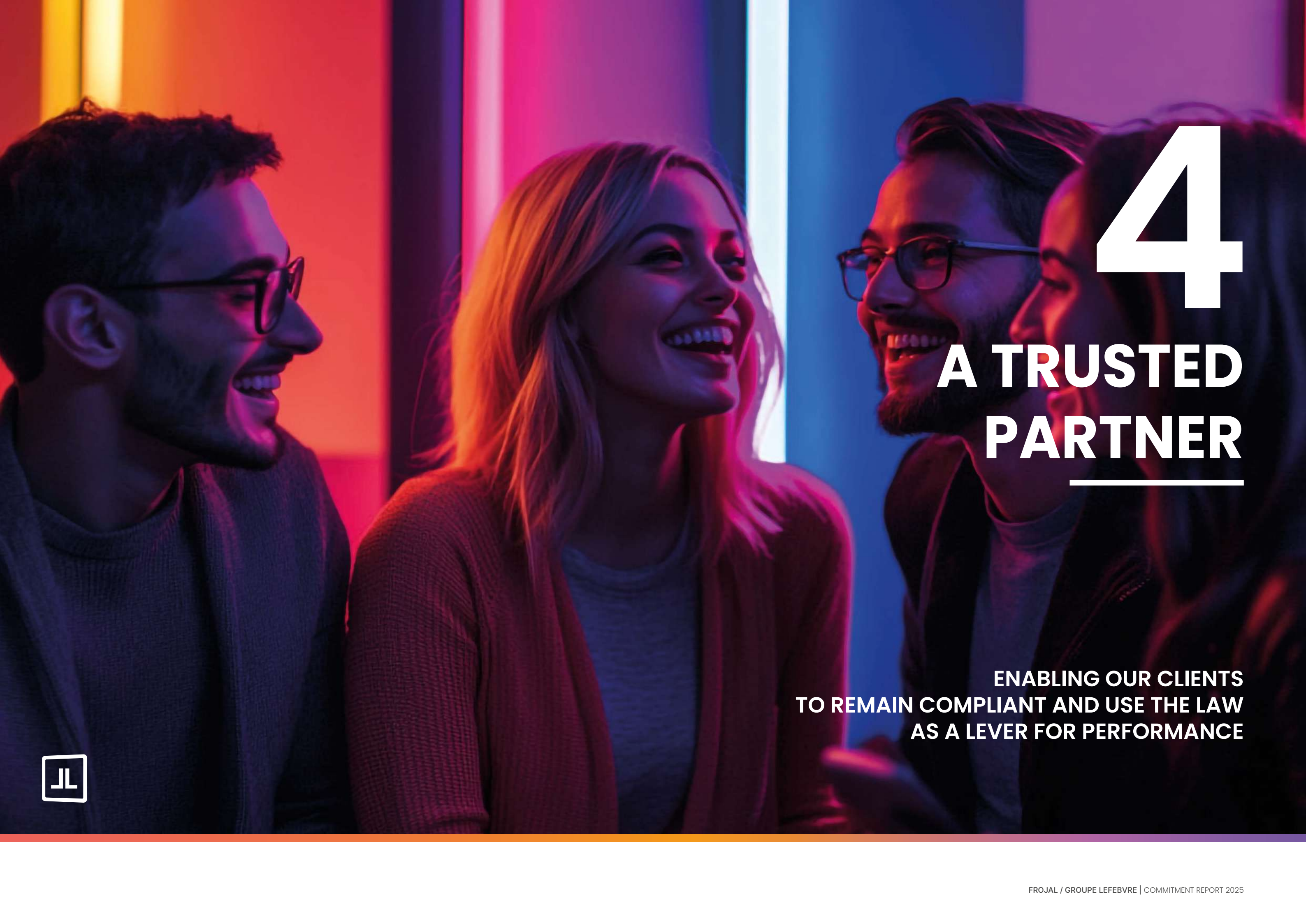
Our contribution towards a more innovative and responsible society

Through its subsidiary Frojal Education, FROJAL joined forces with leading digital tech school La Plateforme_Formation to create **Cyber-Sup**, a higher education institute specialising in cybersecurity and AI. The school trains students with cutting-edge skills at the intersection of IT and legislation, combining the educational excellence developed by La Plateforme_Formation since 2019 with Lefebvre Dalloz's renowned expertise in the regulatory field and digital law in particular.

5.9%
of revenue dedicated
to innovation

ISO 42001
awarded to GenIA-L
in Spain

85%
of employees trained/
briefed on data protection



4

A TRUSTED PARTNER

ENABLING OUR CLIENTS
TO REMAIN COMPLIANT AND USE THE LAW
AS A LEVER FOR PERFORMANCE





Our clients and partners operate in a legal environment that is increasingly complex and highly technical, especially regarding compliance in its broadest sense, covering personal data protection, anti-corruption legislation, and ESG (Environmental, Social, and Governance) criteria. The obligations imposed on businesses continue to grow, requiring them to develop new knowledge, skills, and software.

The Corporate Sustainability Reporting Directive (CSRD) and the Corporate Sustainability Due Diligence Directive (CS3D) recently introduced new regulatory ESG obligations for businesses. Within this context, we are determined to show that the law and compliance must not be seen merely as constraints, but rather as opportunities to create value for our clients, particularly companies.



Listening to our clients to continuously improve our solutions

Feedback from our clients is crucial to our continuous improvement policy. Regular surveys of client expectations and satisfaction, including our Group Net Promoter Score, enable us to gauge the quality of our products and services, identify areas for improvement and hone our priorities. The insights gained are used to build targeted action plans, helping us generate maximum value for clients at every stage of their journey.

NPS clients = 29.1 points

**NPS ESG and
compliance = 41.9 points**

Integrated, effective solutions to support ESG compliance

We help clients understand and manage their ESG obligations with a carefully coordinated combination of expert content, training, and software solutions. This integrated approach not only ensures our clients are able to meet their regulatory requirements, but lets them actually use ESG as a lever of performance to improve their performance, build a competitive advantage, and streamline their operations.

Our range of products and services spans the full ESG value chain: regulatory monitoring and analysis, staff training and upskilling, defining and implementing

sustainability strategies, performance tracking, and support with regulatory reporting, particularly under the CSRD. It includes trusted solutions like **Toovalu**, a software platform for managing climate, CSR, and CSRD strategies, plus leading publications, specialist training programmes, and awareness-raising webinars.

Sharing expertise to inform debate and build trust

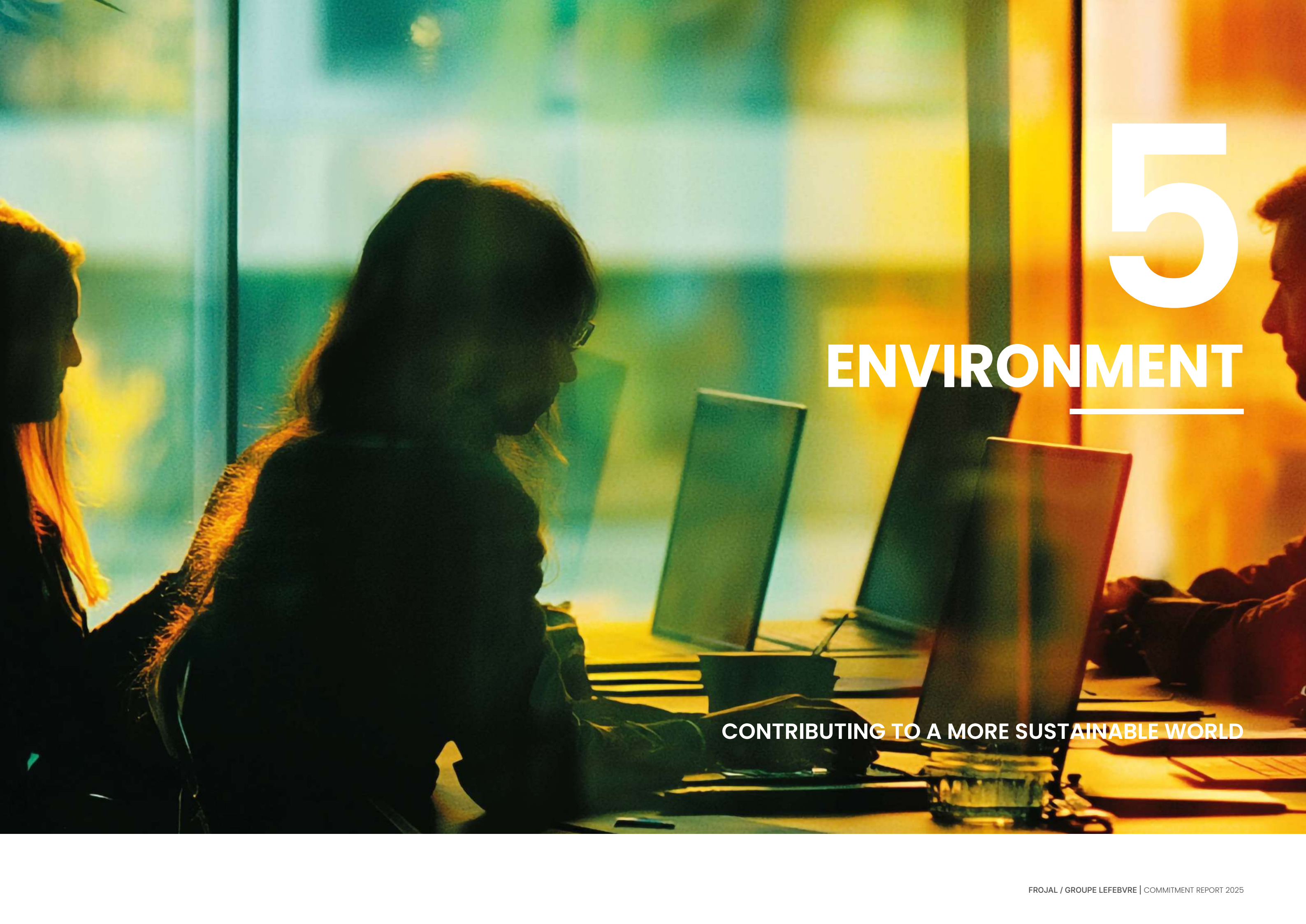
We believe that **law and compliance can play a meaningful role in bringing about sustainable change**. Where appropriate, we aim to anticipate regulatory developments rather than simply react to them. This forward-looking approach enables us to provide clients with reliable solutions that are aligned with emerging requirements, helping them stay one step ahead in a constantly evolving regulatory environment.

We share our expertise through **conferences, publications, and educational content**, promoting a better understanding of legal, ESG, and compliance issues and encouraging constructive dialogue with our stakeholders.

Training the sustainability professionals of tomorrow

In December 2024, FROJAL, through its subsidiary Frojal Education, set up the *Institut d'Économie Durable* (**Institute for Sustainable Economy**). The IED focuses on the regulatory and technical aspects of sustainability. Its mission is to prepare the next generation of sustainability experts by offering high-quality teaching and an approach firmly focused on real-world professional demands. The Institute is supported by an advisory strategy committee made up of leading figures in the field of CSR, including former MEP Pascal Durand. It welcomed its first cohort of students in September 2025.

**ENABLING
OUR CLIENTS
TO REMAIN
COMPLIANT AND
USE THE LAW
AS A LEVER FOR
PERFORMANCE**



5

ENVIRONMENT

CONTRIBUTING TO A MORE SUSTAINABLE WORLD



Environmental responsibility is not just individual but also collective. For this reason we assess and reduce the impact of our direct activities and work closely with our partners and our ecosystem - particularly our suppliers - to improve the footprint of our products and services throughout their life cycle.

We also offer products and solutions to help our clients understand their own environmental impact and implement effective action plans.

Finally, we encourage and train our teams to consider environmental factors in all company activities.



An ambitious, carefully managed climate pathway

We are committed to a **greenhouse gas emissions reduction pathway aligned with the objectives of the Paris Agreement**. Our transition plan covers almost all of our emissions and prioritises the highest-impact areas, namely procurement, paper consumption and, to a lesser extent, mobility, tech use, and energy. This pathway is based on clearly defined operational levers, stronger governance, and continuous improvements in the quality of our environmental data. It reflects our determination to take practical, measurable, and phased action to reduce our carbon footprint over the long term.

Reducing our environmental impact across the value chain

We are taking action at every stage of our value chain to limit our environmental impact and encourage more responsible practices. This includes **working with our suppliers** to measure and reduce their carbon footprint, particularly when it comes to scope 3 emissions. We are also making efforts to mitigate the impacts of our **paper-based activities** by optimising volumes, prioritising paper from responsibly managed sources, and developing circular economy practices such as print-on-demand. These actions are helping to reduce our emissions, conserve natural resources, and limit impacts on biodiversity.

Reducing our energy use and improving building performance

We are working to improve the Group's overall energy efficiency, particularly in our **offices and IT infrastructure**. Our property strategy is guided by stringent environmental criteria, prioritising certified buildings that support hybrid working and are designed to minimise energy consumption. This approach is reinforced by consolidated energy monitoring, increasing use of renewable energy suppliers, and energy-saving measures deployed across all of the countries where we operate.

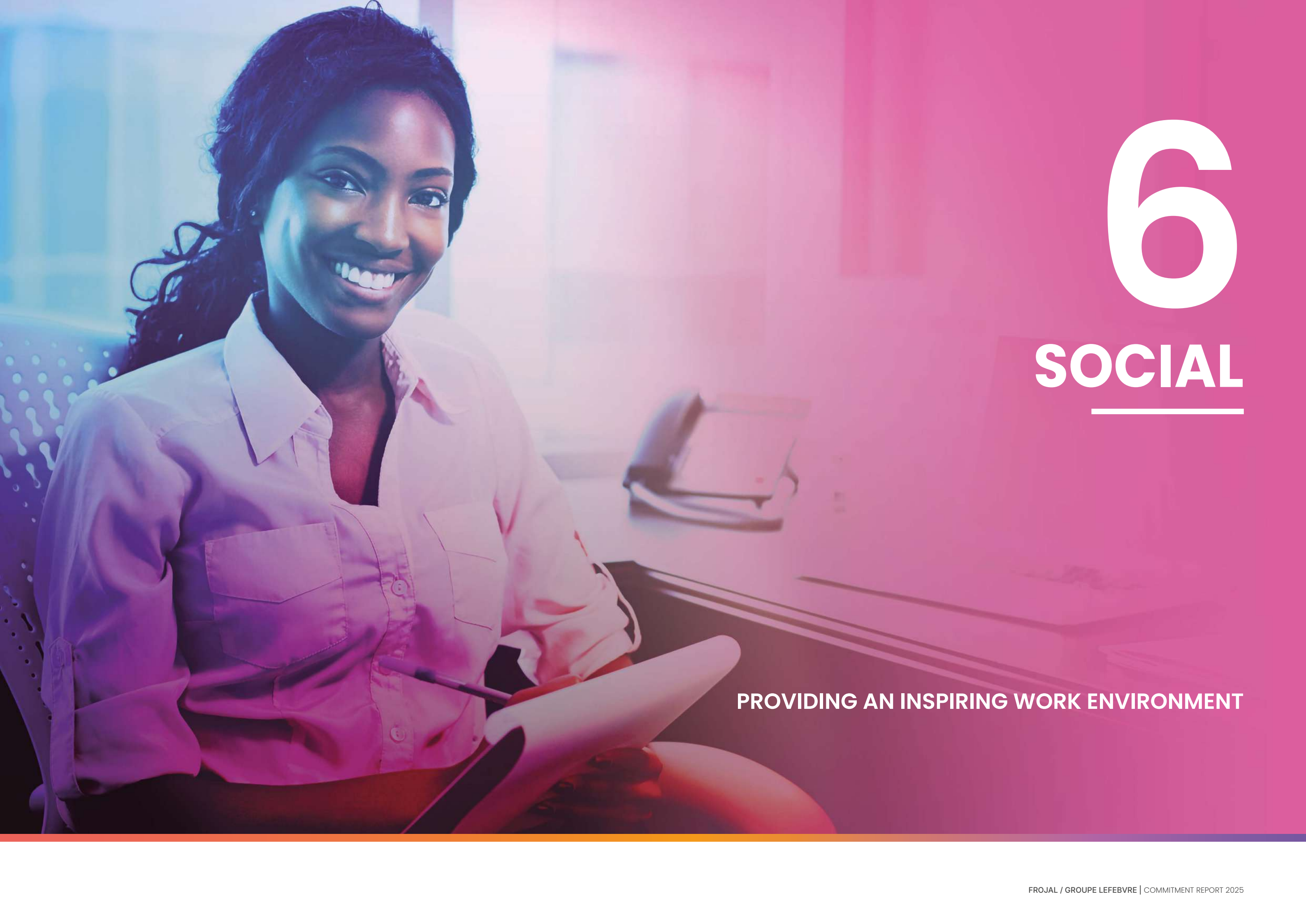
Lefebvre Spain ISO 14001-certified

Our Lefebvre Spanish subsidiary has obtained ISO 14001 certification for Environmental Management. This achievement aligns fully with the Group's environmental strategy. This label provides external and independent recognition of the quality and effectiveness of Lefebvre's environmental management system, enabling the control of consumption, waste, emissions and atmospheric emissions.

99.5%
of our paper is FSC or
PEFC certified and
sustainably sourced

ISO 14001
obtained in Spain

**CONTRIBUTING
TO A MORE
SUSTAINABLE
WORLD**



6

SOCIAL

PROVIDING AN INSPIRING WORK ENVIRONMENT



Based on respect for stakeholders and their fundamental rights, our Group places humans at the centre of its culture. We strive to create an inspiring work environment for our employees by offering motivating projects and fostering innovative and collaborative ways of working, that promote or support their professional development.

As we believe that the experience of each employee is one of our priorities, we roll out a HappyAtWork survey every year conducted by independent firm ChooseMyCompany.



HappyIndexAtWork Europe label

In 2025, we were the proud recipients of **HappyIndex-AtWork certification in Europe**. HappyIndexAtWork is a benchmark for well-being in the workplace. It assesses employee satisfaction based on criteria such as commitment, motivation, professional development, working environment, recognition, and respect.



Uniting our teams around a shared culture and direction

By bringing all our brands together under **one Group name**, founded on our corporate mission and core values, we aim to make our organisation more cohesive and foster a sense of belonging. In doing so, we are uniting our teams around a shared vision, driving change, and giving every one of our staff a sense of meaning and achievement in their work.

Developing our people's skills and supporting career development

We are committed to investing in our employees, providing enhanced **training resources and courses** available to all and helping them to maximise their skills. In addition to mandatory training on key topics (data protection, diversity, inclusion, cybersecurity, compliance), staff now have access to a wider selection of modules designed

to allow them to develop throughout their career. This is all part and parcel of our continuous learning philosophy, something we believe is essential for enabling our people and our Group to be the best we can be.

Promoting equal opportunities and inclusion

We remain as committed as ever to equal opportunities, diversity, and inclusion. That is why we are stepping up our **inclusive employment policy for people with disabilities, working to close the gender pay gap**, and helping **young people to enter the workforce**, in particular through internships and apprenticeship programmes. These initiatives are based on assessments, local partnerships, and in-depth workforce mapping, enabling us to drive measurable and sustainable progress.

PROVIDING AN INSPIRING WORK ENVIRONMENT

2,459
employees in Europe

86 / 100
Gender Equality Index
(France)

69%
of staff trained
(excl. compliance
and GDPR)*

14 hours
of annual training for
each employee*

* Role-specific, hands-on training delivered via local training plans, excluding Group-wide compliance e-learning and awareness modules, and made available to all employees: GDPR: 85% of staff trained in 2025; anti-corruption: 76% of staff trained in 2024.



7

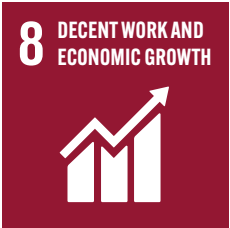
GOVERNANCE

COMMITTED TO DOING BUSINESS RESPONSIBLY



Doing business responsibly is essential to protecting our Group's reputation, building stakeholder trust, managing risk, attracting and retaining talent, and ensuring long-term sustainability.

We are committed to complying with the laws and regulations in all countries where we operate. This means upholding ethical practices and maintaining impeccable conduct, particularly with respect to human rights and working conditions throughout our value chain. It also means promoting our values and fully integrating ESG into our corporate strategy.



Embedding ethics at the heart of our business relationships

We uphold high standards of ethics and responsibility in all our commercial relationships. Our **Responsible Purchasing Charter** provides a common Europe-wide framework for the Group, setting out shared ethical, social, and environmental commitments with our suppliers. By asking our suppliers to sign up to it, we aim to build professional relationships based on transparency, trust, and continuous improvement.

Preventing, detecting, and addressing ethical risks

We rely on a structured Group-wide framework for preventing and managing ethical risks, in line with the requirements of the French "Sapin II" law. Our risk map has identified the areas in which we need to take particular care and enabled us to adopt a targeted action plan.

This framework is backed up by regular business ethics training and a whistleblowing procedure accessible to all stakeholders, ensuring that any concerns can be flagged confidentially with confidentiality and protection for whistleblowers, and that reports are dealt with rigorously.

Strengthening strategic coherence and ESG alignment

We constantly aim to ensure that our business strategy, ESG commitments, and core values are all aligned in the same direction. Regular dialogue with stakeholders, particularly through our Stakeholder Committee, helps us chart a clear and ambitious strategic course in a changing regulatory and economic environment.

Our new European Group brand, in line with our core mission and values, is reinforcing this approach by uniting our teams and consolidating our position as a trusted partner in the fields of legal and compliance.

89%
of our suppliers
have accepted
our Responsible
Purchasing Charter

76%
of our staff have
received anti-corruption
awareness training

**COMMITTED TO
DOING BUSINESS
RESPONSIBLY**

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