

NON-FINANCIAL PERFORMANCE DECLARATION OF THE PULLUP ENTERTAINMENT GROUP

INTRODUCTION

Since the acquisition of the Dovetail studio on 20 April 2023, the headcount of the PULLUP Entertainment Group (PUE) has exceeded the 500-employee threshold. As a result, PULLUP Entertainment is publishing its first CSR Report in compliance with Decree no. 2017-1265 of 9 August 2017 issued for the application of Ordinance no. 2017-1180 of 19 July 2017 on the publication of non-financial information by listed companies with:

- a balance sheet total of €20 M or net sales of €40 M; and
- an average of 500 permanent employees during the financial year.

Since 2021, well in advance of this legal obligation, the PUE Group has published an annual Corporate Social Responsibility (CSR) report presenting its actions. This Non-Financial Performance Declaration (NFPD) reflects the structure of previous editions. It is divided into four chapters:

- Description of the Group's business model
- Presentation of the CSR risks associated with the Group's activity and business model
- Policies and due diligence implemented to prevent, identify and mitigate each risk
- Indicators for policy assessment.

The strategic CSR areas presented in our previous CSR reports are included herein as follows:

CSR Report		NFPD
Theme 1: Gamers	→	Area 1 Economy & social
Theme 2: Employer	→	Theme 2 Social
Theme 3: Ecosystem	→	Theme 3 Environment
	→	Theme 4 Governance

Finally, this year we are publishing this CSR report for our institutional stakeholders and to meet legal obligations. A broader description of our actions will feature in our CSR report.

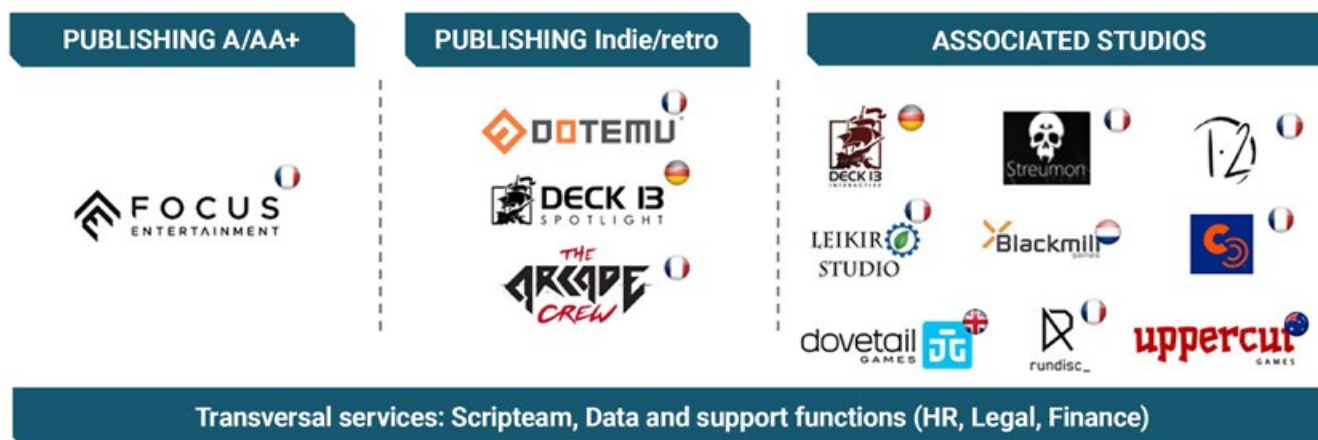
BUSINESS MODEL

The *Group Business* section of the Management Report details our business model. This report summarises key elements to ensure clarity regarding key issues covered in this NFPD.

ABOUT US

The PUE group has built up over 20 years of experience in video game publishing. Since 2020 and the acquisition of its first studio, Deck 13, based in Germany, we aim to control the entire value chain by developing some games ourselves. The Group had 614 employees as of 31 March 2024, around 65% of them in development, organised in three business lines:

- AA games publishing, led by Focus Entertainment Publishing (FEP)
- Publishing of retro and independent games by Dotemu
- Video game development, with seven studios based in Europe: Deck 13, Streumon, Douze Dixièmes, Leikir, BlackMill, Dovetail and Carpool



In 2023, the Group set up the audiovisual production company Scripteam to develop intellectual property on platforms other than video games in the future.

Finally, at the end of June 2024, the Group welcomed two new associate studios with minority holdings: Rundisc and Uppercut games.

These three business lines receive daily support from functional departments including HR, legal affairs, finance and data.

Our expertise covers all the steps in a game's development, including technical issues, testing and game consistency. Our support teams work closely with our marketing, creative and communications teams, who announce and organise the game releases months in advance. The games are then sold on platforms or sent around the world for physical sale.

THE PULLUP GROUP IN A FEW FIGURES

Sales	Share of sales from the year's releases	Share of games sold on online platforms	Number of games/additional content (DLC) released over the year
€187.3 M	29%	90% ¹	10 games and 18 DLC

Group sales for 2023-24 reached €187.3 M. Breakdown:

- 29% of sales generated by new releases for the year
- 66% of sales generated by the back catalogue, i.e. by offering regular additional content to extend and renew gamers' experience of titles released several months or years ago.
- the remaining 5% of revenue is generated from other business: influencer marketing agency and the recently created audiovisual platform, Scripteam.

PUE is known for establishing strategic partnerships with promising independent game developers, bringing innovative and unique titles to market. Our games are often acclaimed for their graphic quality, solid gameplay and immersive storytelling which attracts a loyal fan base. We co-own some games with external studios who entrust us with the realisation of their project. Atlas Fallen was the first release of a game developed by the Group's in-house studio, Deck 13.

We have earned particular recognition for our video games publishing activity, particularly in the role-playing (RPG), strategy and simulation game genres. Our scope across a wide range of video game genres means we reach different market segments and cater for different gamer preferences. Games developed or published by PULLUP Entertainment are defined as AA² or independent³.

Finally, we cultivate our relations with the gamer community by providing ongoing support after games are released and encouraging open dialogue with players.

¹ Unaudited figures

² An AA game is between an independent game and a AAA game. They combine codes from independent games with bigger budgets and support from publishers.

³ Independent games are developed by studios with creative freedom and innovative concepts but limited financial and human resources.

MAIN NON-FINANCIAL RISKS ASSOCIATED WITH THE GROUP'S BUSINESS

In 2020, we defined our CSR strategy and the Group's contribution to the United Nations Sustainable Development Goals (SDGs). We carried out internal, external and sectoral analysis to map our main stakeholders. By our definition, stakeholders are all organisations or individuals who have at least one direct or indirect interests in a decision or activity of the company. PUE has identified several categories of stakeholders:

Gamers	Individuals, teams, communities
Employees	Employees, trainees, service providers, Social and Economic Committee (CSE)
Investors and shareholders	Shareholders, investors, banks, rating agencies
Partners	Development studios
Suppliers and subcontractors	Suppliers of hardware, software, services and other goods
Government, public bodies	Certification bodies, standards bodies, professional organisations, CNC (French national film centre), media
Local communities	Local associations, schools

To determine which are the most important stakeholders to consult, PUE has put in place an approach based on two criteria: The significance of the impact of PUE on the stakeholder and the influence of the stakeholder on PUE and the level of relationship between PUE and the stakeholder.

Nine significant CSR issues resulted from analysis of our internal and external stakeholders⁴:

1. Player satisfaction and competitiveness
2. Player health and safety
3. Diversity and anti-discrimination
4. Protection of personal data and information security
5. Risk management, business continuity and business ethics
6. Working conditions and well-being at work
7. Attractiveness, employee retention and career development
8. Intellectual property
9. Climate change and carbon footprint

Issues addressed in the CSR strategy	Risk	Sustainable Development Goals
Theme 1 ECONOMIC AND SOCIAL		
Customer satisfaction, player health and safety	Controlling toxicity in our games	
Theme 2 Social		
Talent retention	Loss of experience and competencies via HR turnover	
Skill development	Lacking necessary skills for development	
Attractiveness	Recruitment difficulties and lack of attractiveness	
Theme 3 Environment		
Climate change and carbon footprint	Risks for the environment and not contributing to society	
Climate change	Overconsumption of limited energy resources	
Theme 4 Governance		
Business ethics	Risks of corruption and dishonest behaviour	
Personal data protection	Data leaks and intrusion	

⁴ CSR report available on the PULLUP website: https://cdn.focus-home.com/fhi-fastforward-admin/company/RSE/RAPPORT_RSE_2023_FR.pdf

“Player satisfaction and competitiveness”, “Diversity and anti-discrimination”, “Risk management and business continuity” and “Working conditions and well-being at work” are defined as areas of concern which do not constitute major risks as defined by the NFPD. They are covered in the CSR report.

Note: this CSR strategy was defined after the acquisition of our first in-house studio, Deck13. Our strategy of diversifying our business and intellectual property holdings was already under way.

SUMMARY OF THE LINKS BETWEEN OUR CSR CHALLENGES, NON-FINANCIAL RISKS, POLICIES AND INDICATORS

Issues addressed in the CSR strategy	Risk	Criticality	Formalising policy						Indicators	Unit of measurement
			Name	Objective	Guiding principles	Responsibilities	Communication and awareness-raising	Goals		
Theme 1 Economic and social										
Player health and safety	Uncontrolled toxicity in our games	Important	Combating toxic behaviour in our games	Ensure peaceful conditions for players with online multiplayer access	Encourage partner studios in development to: - set up ban systems - include voice chat filter systems	For PC games: development studios are responsible for implementing ban systems but responsibility for monitoring effectiveness lies with our production teams. Game sales platforms, such as Steam and Epic Game Store, can be used to report toxic behaviour, which can lead to a ban. For console games: we follow console manufacturers' guidelines. Tools are provided in consoles for reporting players who are toxic or whose behaviour does not comply with our or the platform's End-User License Agreement (EULA). They can also stop all communication with these players via the blocked player list and cutting voice chat. Under-age players with parental controls have their online communication functionalities controlled via a range of permissions such as invitations and voice chat.	We inform our studios of this policy when developing multiplayer online games. It is applied on games which are mainly destined for use online.	By providing these tools, PULLUP Entertainment shows players they are not helpless when confronted with toxic behaviour. We ensure they have a safe space where respect is expected.	Percentage of our multiplayer online games with a ban system	%

Issues addressed in the CSR strategy	Risk	Criticality	Formalising policy						Indicators	Unit of measurement
			Name	Objective	Guiding principles	Responsibilities	Communication and awareness-raising	Goals		
Theme 2 Social										
Talent retention	Loss of experience and competencies via HR turnover	Important	Employee retention	We aim to give each employee a future in the PUE Group by providing them with the best possible working conditions.	Sense of belonging and employer brand Pleasant working conditions for everyone Salary incentives	HR and Office Management are responsibility for applying this policy.	Information about this policy is communicated to teams regularly, particularly through quarterly meetings organised by management to communicate on current projects. We also distribute newsletters regularly. A social survey is carried out every two years and the results are reported to staff representatives and then to employees.	We improve working conditions to show our employees this issue is a high priority. This work began three years ago to respond to the results of the initial social survey carried out at Focus Entertainment	Attrition rate (voluntary and involuntary) v turnover (voluntary) %	%
									Satisfaction with quality of life at work	%
Skill development	Lacking necessary skills for development	Medium	Employee development	Create a stimulating work environment conducive to our employees' professional and personal development to attract the best talent and foster long-term loyalty.	1. Professional development 2. Work-life balance 3. Encouraging feedback and recognition	Responsibility for implementing this policy is at every level of the organisation, from senior management to individual employees. We encourage every member of our personnel to participate in creating a positive and rewarding working environment.	This policy is communicated to all employees clearly and transparently and we encourage full and active participation in its application. Open communication channels will be developed to collect feedback and suggestions from employees.	Adopting a policy focusing on employee development demonstrates the PUE Group's commitment to its employees which forges stronger engagement, loyalty and satisfaction. This also helps to attract and retain the best talent in the market, essential for the company's growth and success.	Percentage of average workforce who received training	%
									No. of hours of training provided by the company/people trained	Number of hours
Attractiveness	Recruitment difficulties and lack of attractiveness	Medium	Attracting talent	Be recognised as an attractive employer and encourage future talent to join the PULLUP group. Be competitive for short-staffed occupations.	Visibility in recruitment channels Develop an employer brand Onboard and nurture new recruits	The HR departments are responsible for this objective, from recruitment through to onboarding new recruits.	This informal policy is monitored by the recruitment officer, who develops links with our recruitment partners such as trade fairs and schools. The reception process is automated via Lucca, to anticipate each new recruit for administrative and IT issues.	The Group aims to cultivate an attractive image and ensure recruits have optimal conditions for starting their adventure with us.	Average time a job is vacant	Number of days

Issues addressed in the CSR strategy	Risk	Criticality	Formalising policy						Indicators	Unit of measurement
			Name	Objective	Guiding principles	Responsibilities	Communication and awareness-raising	Goals		
Theme 3 Environment										
Climate change and carbon footprint	Risks for the environment and not contributing to society	Low	Reducing CO ₂ emissions	Reduce our carbon footprint to mitigate the effects of climate change by reducing the carbon dioxide emissions generated by our business.	1. Emissions analysis 2. Reduction targets 3. Transition to renewable energies 4. Promoting sustainable mobility 5. Carbon off-setting	Senior general management, including the entire Executive Board, are responsible for implementing this policy. We encourage everyone to participate in reducing our CO ₂ consumption.	This policy will be communicated to all employees in a clear and transparent manner, and involvement will be encouraged at all levels. We will also inform our players, business partners and the general public about our efforts to reduce CO ₂ emissions.	Adopting a policy to reduce CO ₂ emissions,emissions demonstrates our commitment to the fight against climate change. This addresses expectations of stakeholders and society generally.	transport-related emissions	TeqCO ₂ /km travelled
	Overconsumption of limited energy resources	Low	Managing energy consumption	Controlling and optimising our energy consumption	Raising team awareness of the issues surrounding our energy consumption Transitioning to renewable energies	The CSR manager oversees the policy but reducing our energy consumption is also the responsibility of every employee.	Informal policy Raising awareness among employees about the benefits of environmentally friendly actions and stakes	Reducing our consumption will give us a more coherent understanding and control of our energy impact.	Total GHG emissions	TeqCO ₂
									Electricity consumption/employees	KWh/employee
									Percentage of electricity from renewable sources	%
									Water consumption/employees	litres or m³
	Waste management and reduction	Limit office waste	Provide suitable equipment in offices Encourage employees to sort and communicate best practices Reduce plastic consumption	The general services manager organises waste bins and collection	Informal policy Regular communication with teams on the importance of waste sorting and management	By getting our teams involved in reducing and sorting waste, we will reduce our impact and our teams will be more engaged in daily office operations.	Percentage of waste sorted and recycled/total waste	%		
							kg waste recycled/employees	kg		
Theme 4 Governance										
Issues addressed in the CSR strategy	Risk	Criticality	Formalising policy						Indicators	Unit of measurement
			Name	Objective	Guiding principles	Responsibilities	Communication and awareness-raising	Goals		
Business ethics	Risks of corruption and dishonest behaviour	Medium	Business ethics	Promote fair practices and ethics in business	Define the issues and limits Create a mechanism for reporting malfunctions or dishonesty	Led by our legal director, this project aims to provide a framework for practices and exchanges with the Group's partners.	An ethics charter setting out our values, rights and duties and recalling our internal whistleblowing system has been distributed to PUE and Focus employees and will be more widely communicated throughout the Group.	The aim of this policy is to provide a framework for our teams with information about best practices.	Number of alerts received	number
Personal data protection	Data leaks and intrusion	Important	Information systems security	Protect against intrusion and attacks that could jeopardise our business	Security process for IT tools Security audit with penetration testing of our tools and proposal for corrective actions Raising employee awareness using an online tool	Our IS security manager is responsible for implementing the IT security policy and tools. All employees must be trained and informed to apply this policy.	An awareness-raising tool has been shared with PUE and Focus employees. Our IS security manager is developing a process for the supervision of Group practices.	Giving everyone in the Group the means and tools to limit IS intrusion and attacks will improve our security.	Percentage of cyber attacks resulting in business interruption	%
									Percentage of employees aware of the issue	%

Key performance indicators

Theme 1: ECONOMIC and social

% of multi-player online games with a ban system	100%
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Theme 2: Social

Attrition rate over the year	17.2%
% of average workforce trained during the year	24.9%
Average time a job is vacant	59 days

Theme 3: Environmental

gram eqCO ₂ /travelled during the year	153 geqCO ₂ /km
% of renewable electricity consumed during the year	40%
Rate of recycled waste/collected waste	47.0%

Theme 4: Governance

number of alerts received on our whistleblower system	0
% of cyber-attacks resulting in business interruption	0.0%

1. THEME 1 > ECONOMIC AND SOCIAL

Player health and safety

This is an important issue because it covers all the risks and concerns caused by playing video games:

- Safety:
 - Protection against toxic behaviour
 - Parental control and information regarding age rating, type of game, etc.
- Health >> Impact of screens and screen time

It is important to optimise **player safety** by protecting them from toxic behaviour in online games. Toxic behaviour can take the form of textual or verbal harassment, anti-gambling or cheating.

We have identified a risk of toxicity in our multi-player online games. This is a major risk, ranging from negative impact on our players' gaming experience to more serious cases of harassment. It is important to eradicate this risk so our players can enjoy peaceful conditions.

To reduce this risk, we have introduced a policy to combat toxic behaviour. We encourage our partner studios to provide in-game moderation with ban systems. As a result, our games are equipped with systems, either in-house or by our partners, that provide measures such as refusing exchange between competing players, blocking written or voice chat, and reporting non-compliant situations that can be sanctioned by bans. The responsibility for putting these systems in place lies with the development studio, and we are responsible for their operation.

Our partners already have tools in place to complement our efforts in this area.

When players create an account, which requires internet access, they agree to comply with the Community Code of Conduct, which governs interactions between players on the platforms. Registered players can help make the community a welcoming and inclusive place by behaving respectfully and reporting any misconduct to platform operators.

Lastly, if parental control is activated for underage players' accounts, features for inviting other players and communicating with them can be controlled by granting degrees of permission to underage players.

KPI: % of multi-player online games with a ban system = 100 %

By providing these tools, PULLUP Entertainment shows players they are not helpless when confronted with toxic behaviour. We ensure they have a safe space where respect is expected.

Toxic situations are possible despite our efforts, with risks of reputation damage for the Group and partner studio. We therefore closely monitor innovations in these areas, drawing on the experience of other studios and publishers with more experience with online games.

Two other important issues are: parental control and data security in games and the impact of screens and screen time.

These are sensitive sector-specific issues that are the subject of constant investigation by SELL, the professional association of leisure software publishers, to which the PUE Group is member. The Chief Executive Officer of the PUE Group is a member of SELL's Board of Directors. SELL is also a partner of Capgame, an association for accessibility and Women in Games, an association for gender parity.

Finally, SELL has published a comprehensive study on the responsible use of video games, to support parents with their children's use of video games.⁵

⁵ https://www.sell.fr/sites/default/files/espace-presse/guide_pratique_responsable_2023.pdf

2. THEME 2 > SOCIAL

2.1. Talent retention

Given the demanding and competitive nature of the video games industry, retaining talent is a challenge in the sector. INSEE estimates the average attrition rate across all sectors in France to be 15% in 2021. A lack of human resources and experience with a loss of competencies is an important risk.

To address this problem, PUE policy is to foster employee loyalty through incentives such as profit-sharing and employee share ownership. PUE monitors these issues constantly and their impact on business challenges and maintains open dialogue with staff representatives. The economic situation can provide leverage, particularly in Europe where inflation has been high for over a year. The Group strives to provide pleasant working conditions, attractive salary benefits and a sense of belonging to the company.

PUE also supports sports activities via its social and economic committee, and free weekly physical activities are offered to employees such as basketball, volleyball and football.

In accordance with legal provisions, the Group authorises employees serving in the reserves to take the 10 days of leave provided for by law.

For PULLUP Entertainment and Focus Entertainment Publishing, an external consultancy conducts a social survey every two years to identify trends and areas where employee satisfaction can be improved in the two entities. The anonymous survey consists of around sixty questions about the feeling of belonging, working conditions, and communication between colleagues, teams and management.

One of the resulting indicators is the percentage of satisfaction with the quality of life at work. 91% of employees surveyed are satisfied or very satisfied with the quality of life at work.

KPI: Attrition rate in 2023-2024: 17.2%

By improving the working conditions of its teams, PULLUP Entertainment aims to develop a sense of belonging and well-being among employees and boost the employer brand. This means maintaining good working conditions, clear internal communication between teams and between management and employees, and making employee well-being a priority.

2.2. Skill development

Given the evolution of techniques and technologies and increasing consumer expectations, skill development in the video games industry is essential. The main risk is a lack of suitable skills for developing games, which could lead to production delays.

To meet this challenge, PUE has put in place an employee development policy that focuses on business skills as well as on collaborative and managerial aspects. We aim to create a stimulating work environment where employees can envisage personal and professional fulfilment. This encourages loyalty long term.

We track two indicators:

KPI: % of average workforce trained during the year= 24.9 %

Monitoring indicator: average number of hours of training given to personnel trained = 14 hours

Adopting a policy focusing on employee development demonstrates the PUE Group's commitment to its employees which forges stronger engagement, loyalty and satisfaction. For example, the managerial training courses put in place help to improve the skills of those trained and encourage internal promotion of employees. Training courses on stress management and technical skills for each individual's job, for example in design, finance, and English, have been offered. Each entity prepares its training programme according to their needs. This helps to attract the best talent on the market, develop their skills and retain them over the long term, which is essential for the company's growth and success.

2.3. Attractiveness

The attractiveness of companies in the industry is a major issue when it comes to attracting and retaining talent.

The significant risk is difficult recruiting the right people.

Our reputation in the highly competitive video games sector for publishing and creating innovative games means certain positions are particularly strategic and demanding of skills and profiles. The annual barometer⁶ of France's national video game union shows that 77% of jobs are technical and directly linked to games, and only 23% are in management, publishing and support. Of these 77%, 31% are in technology, 23% in design and 23% in image and sound. These categories require specialised and highly sought-after profiles, with expertise in fields such as game design, graphic design and data analysis.

We have decided to diversify our recruitment policy to meet these recruitment challenges. This includes taking part in specialist trade fairs, working with partner schools such as Supinfo, IIM and Futuræ in France, and using recruitment agencies and head hunters for certain positions. Co-option is also used to recruit.

Onboarding new recruits includes a presentation of the company and a digital welcome booklet. To facilitate integration, our managers have set up a mentoring system to ensure smooth integration for new recruits.

The aim of this talent attraction policy is to be recognised as an attractive employer and to encourage future talent to join the PUE Group. We add new initiatives to this policy every year.

KPI: Average time a job is vacant = 59 days

By creating an environment conducive to innovation and quality with our unique game offer, the Group aims to cultivate a positive reputation to attract and retain the best talent. This approach aims to promote PULLUP Entertainment's employee brand in a competitive market and build long-term success.

⁶ <http://snjv.org/publications/>

3. THEME 3 > ENVIRONMENT

3.1. Climate change and carbon footprint

Climate change is an increasingly important issue for the video games sector. Every year, the sector's impact on children's and parents' leisure time grows. Therefore, the impact on the climate is an issue. Climate change has little effect on our business and is not a direct risk.

However, it is concern for the Group and our stakeholders, and the threat of climate change to society overall is undeniable. This issue goes beyond the Group's concerns, and we must act to reduce our impact on climate change.

We have measured our carbon footprint for some of the Group's entities which has led us to establish a policy to reduce our CO₂.

This policy was put in place recently and is not yet the subject of concrete objectives. One of the qualitative objectives for the future will be to measure the whole Group's carbon footprint so we can roll out a quantified policy for reducing our greenhouse gas emissions.

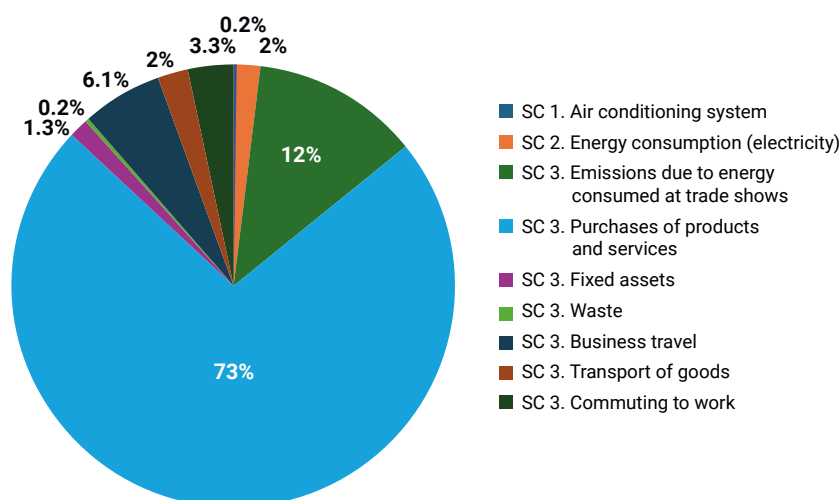
External service providers measured the carbon footprint of Dotemu, Dovetail and Douze Dixièmes in 2022 and PUE in 2023. The greenhouse gas emissions measured for these Group entities⁷ was 4778.6 TeqCO₂.

	2023-2024	2020/2021
Scope	PULLUP Entertainment - Dovetail - Douze Dixièmes - Dotemu - Focus Entertainment Publishing	Focus Entertainment
Scope 1	7.2	10.3
Scope 2	84.7	5.2
Scope 3	4,686.7	2,758.1
TOTAL	4,778.6	2,773.6
TeqCO ₂ /employee	10.7	18.9

Scope 1 = 7.2 TeqCO₂ and mainly includes emissions linked to air conditioning.

Scope 2 = 84.7 TeqCO₂ and concerns energy consumption of electricity, gas etc. in offices.

Scope 3 = 4,686.7 TeqCO₂, 73.2% of which is for purchases and 12% for energy-related emissions from trade show participation. 6.1% for business travel and hotels and 3.3% for commuting. Lastly, data relating to upstream and downstream transport accounted for 1.9%. Other emissions relate to waste (0.2%) and fixed assets (1.3%).



It is difficult to compare variations in gross emissions because the carbon footprint was last measured for Focus Entertainment, and data for this financial year is for four entities. Note: data relating to game use has been estimated but is not included in the results. This is not included in the reporting scope as there is no effective methodology effectively for measuring the data.

However, initiatives to assess the carbon impact of video games were initiated recently. For example, the Jyros tool which has been released. Our studios Douze Dixièmes and Dotemu participated in test phases of the tool phases and were able to evaluate the emissions from their games. It is reasonable to assume we will be able to assess this data more accurately in the near future.

Focus Entertainment conducted a carbon footprint assessment three years ago without committing to any reduction targets. We did however commit to a new travel policy limiting the use of air travel for journeys of less than 300 km. Our online management tool makes it possible to limit results to trains for short journeys. We strongly recommend this option, without obligation for special cases such as long train journey times and strikes.

⁷ The following have conducted a carbon footprint assessment: PUE, Dotemu, Dovetail and Douze Dixièmes.

For PUE & FEP for the 2023-2024 financial year:

Journeys under 300 km:

Journeys of 300 km and less			
% of journeys	Km	Train	Plane
4%	5,950	100%	0%

300 km to 600 km:

300 to 600 km			
% of journeys	Km	Train	Plane
59%	179,165	95%	5%

Note: 74% of the Paris-London journeys, which represents 11% of the total number of journeys, were by train. 94% of the Paris-Frankfurt journeys, which represents 15% of the total number of journeys, were by train.

Over 600 km:

Over 600 km			
% of journeys	Km	Train	Plane
37%	179,165	8%	929%

The Paris-Nice journey, difficult by train for a one-day return trip, was the only domestic journey in France entirely by plane.

8% of journeys made by train: Paris-Bristol, Paris-Montpellier and Paris-Toulouse were 100% by train.

We encourage employees to organise meetings using Teams with facilities organised for remote meetings to avoid travel whenever possible.

KPI: gram eqCO₂/km travelled for the year = 153 geqCO₂/km⁸

Our policy to reduce CO₂ emissions demonstrates the Group's commitment to the fight against climate change. As a result, we are addressing the expectations of our stakeholders and society as a whole.

3.2. Energy consumption

All technology sectors are concerned by the overconsumption of energy and management of natural resources and that includes the video game industry. According to ADEME, by 2022, 10% of electricity consumption be due to digital services, including video games. This concerns energy consumption for storage and servers, resources for manufacturing consoles, PCs and other equipment, knowing that this activity absorbs large quantities of our dwindling natural resources.

The risk is low for our business, but we have put in place an energy consumption management policy to control and optimise our consumption. For PUE, the process began in 2020 with our first renewable electricity contract. We monitor consumption in our offices and aim to limit waste. We also conduct an awareness-raising approach with events such as European sustainable development week and communication regarding waste sorting. For example, our partner Kroptek was invited to raise awareness among employees of how coffee grounds can be reused, and gave a workshop on making mushroom boxes. The aim is to control and optimise our energy consumption.

We monitor consumption:

- Electricity in kWh / employee = 1,013 kWh / employee.
- Water in litres / employee = 290 l / employee
- Gas in kWh / employee = 140 kWh / employee

KPI: 40% renewable electricity consumed during the year

3.3. Waste management

Waste management has little impact on video games, but it's a crucial daily issue. We need to address games packaging and office waste. The non-financial risk is low, but it is a concrete issue for raising awareness among our employees of the company's environmental impact. Reminding teams they are involved in everyday actions helps to involve them in targeted CSR actions.

Obligations and sorting protocols vary by country, hence practices are not the same throughout the Group depending on the subsidiary. At head office, we launched two initiatives for 2019:

- Reducing waste by limiting the use of plastic cups and providing carafes and glasses for meetings
- Increasing the range of voluntary sorting options available:
 - glass, paper, cans and bottles, coffee grounds and ordinary waste

We also donate office supplies in good condition to local associations and have our old PCs reconditioned to give them a second life.

We aim to limit office waste, which is why we monitor the proportion of waste sorted and recycled compared to waste collected.

KPI: Rate of recycled waste/collected waste = 47%

No comparison is yet available for the results of this policy as this is the first year we have been tracking this data all Group entities. Education about the policy is required and reduction targets will be set. Over and above their objectives, office waste policies are simple and effective ways of raising awareness about environmental issues among employees and getting teams involved in the daily operations.

⁸ Reference: Greenly estimates 2.4 g of CO₂ equivalent per passenger per km: <https://greenly.earth/fr-fr/blog/actualites-ecologie/empreinte-carbone-comparatif-transports>.

And 230g CO₂/passenger/km for short-haul flights: <https://greenly.earth/fr-fr/blog/actualites-ecologie/empreinte-carbone-vol-en-avion>

4. THEME 4 > GOVERNANCE

4.1. Business ethics

Business ethics is an important issue, as it governs the way we deal with our stakeholders, particularly our business partners. This issue covers compliance with pertinent laws and regulations, particularly the fight against corruption.

The risk identified is abnormal or dubious behaviour and corruption.

PUE has put in place a system to enable anonymous reporting of anomalies and dubious behaviour to limit corruption risks. Using this system, employees can report serious and unlawful acts witnessed internally. The platform guarantees confidential, anonymous processing and safe communication. Our legal officer is responsible for this policy. It was made available online to teams in 2022, and a procedure for using the tool is available to the entire team.

PUE has also published an Ethics Charter, which addresses the issues of probity and anti-corruption and provides a framework for employee practices. This Charter is distributed at head office and will be distributed throughout the Group.

KPI: number of alerts received on our whistleblower system in 2023-2024 = 0

This policy aims is to provide a framework for our teams' practices, informing them of recommended best practices.

4.2. Privacy and data protection

Privacy and data protection is an important issue in an interconnected world. Widespread use of digital games on consoles and PCs has become the norm, forcing gamers to share their data online.

This creates a number of data security risks for both players and our employees: data leaks, intrusion and blocking work tools via fraud and hacking.

The data and privacy protection policy is managed by our IS security manager. They ensure that all the processes and tools for data security and privacy are in place. They are also responsible for monitoring the network and infrastructure in real time, using tools provided. A penetration test was carried out at the PUE headquarters in 2023. A security audit, a second test and a remediation plan, which serves as a counter audit. According to the results, adjustments were made to the systems in place to protect against threats. The same year, PULLUP Entertainment also launched an awareness-raising programme with the Kamae platform to train employees in cybersecurity issues. It is important prepare our teams to limit risks caused by intrusion. We therefore track an indicator for the proportion of employees who have been made aware of the issue of IT security. Today, 65% of the Group's employees have received training in this area.

KPI: % of cyber attacks resulting in shutdown in 2023-2024 = 0

Involving everyone in the Group and giving them means and tools to limit IS intrusion and attacks will reduce risks of intrusion and attacks.

NOTE ON METHODOLOGY / ABOUT THIS REPORT

The change of name from Focus Entertainment to PULLUP Entertainment was approved by the Board of Directors and the Shareholders' General Meeting at the end of the 2023-2024 financial year. Focus Entertainment has been split into two entities: the holding company PULLUP Entertainment and its subsidiary Focus Entertainment Publishing. With a few exceptions, which will be explained, we refer to the PULLUP Entertainment group for the outcome of the financial year.

BM&A helped us to organise this NFMD. We would like to take this opportunity to thank them for their help and professionalism in this area.

1. Description of non-financial reporting in the NFPD

The indicators used in the reporting protocol for this NFPD are the result of several workshops attended by managers from Focus Entertainment's various departments in 2020: production, marketing, HR, legal and IS.

Other indicators were added in 2024 to meet NFPD requirements.

These indicators were then classified into two categories using the materiality matrix drawn up in 2020: (i) key performance indicators for more important issues and (ii) monitoring indicators with no risks.

2. Reporting scope

The reporting scope is the PUE Group, including all its video game publishers and associated studios. When this is not the case, the different scope is always explained and the companies concerned indicated.

Social data

All Group entities are included in the social data.

Environmental data

Carbon footprint data only includes PULLUP Entertainment, Focus Entertainment Publishing, Dotemu, Douze Dixièmes and Dovetail Games. The other Group entities will be included for the 2024/25 financial year.

Note: the 18 employees of the Blackmill subsidiary work from home as the company has no premises. It is there excluded from data on energy consumption and waste.

3. Reporting period

Our reporting data covers the tax period from 1 April 2023 to 31 March 2024. The social barometer was carried out for the 2022 calendar year.

The carbon footprint assessments, Bilan Carbone®, were carried out over calendar years:

Company	Year
Focus Entertainment	2023
Douze Dixièmes	2022
Dovetail	2022
Dotemu	2022

Emissions due to product use and end-of-life are not included in the scope. No recognised and reliable tool exists for assessing specific emissions from playing our games around the world.

Calculation: $\text{TeqCO}_2/\text{employee} = \text{GHG emissions in TeqCO}_2 / \text{average number of employees}$

Entities concerned: Dotemu, PULLUP Entertainment, Focus Entertainment Publishing, Douze-Dizième and Dovetail

4. Reporting process

Data collection is centralised by PUE's CSR manager with the relevant departments in each entity.

Our HR IS tool is one of the sources used for data collection. A reporting protocol has also been created, setting out the list of CSR indicators, their definitions, calculation methods, scope and data sources. It is the reference for data collection and consolidation.

5. Indicator methodology

5.1. Economic/social indicators

Percentage of our online games with a ban system

We focus exclusively on games played online with other players that include communication features.

Entities concerned: Focus Entertainment Publishing, Dotemu and BlackMill Games

Calculation: $\text{Number of multiplayer online games with a ban system} / \text{number of multiplayer online games} \times 100$

5.2. Social indicators

Average headcount

The average headcount covers all employees on permanent or fixed-term contracts at the end of the period, regardless of whether they are full- or part-time. Employees on parental leave, maternity/paternity leave or sabbatical leave are also included. This excludes trainees, subcontractors, temporary workers, self-employed workers and casual workers.

Calculation: $\text{average monthly headcount} / 12 \text{ months}$.

Entities concerned: all

Number of departures, attrition and turnover rates

The number of departures includes the following types:

- Departures on the employee's initiative: end of contract i.e. resignation and retirement
- Departures on the employer's initiative: individual or economic redundancy
- Departures by mutual agreement: severance agreements
- Departures at contract term: end of fixed-term or professional training contract
- Departures for other reasons: death

The attrition rate shows the ratio of departures to the company's average workforce over the period.

Calculation: $\text{Attrition rate (HR)} = \text{number of departures} / \text{average number of employees over the year} \times 100$

Entities concerned: all

Staff turnover

This rate was tracked in our previous CSR reports. We prefer to focus on the attrition rate. The turnover rate shows the rate of departures and arrivals. AS a growing group, recruitment levels distort the results, sending a false message that does not reflect our efforts to retain employees and limit departures.

Satisfaction survey: Quality of life at work

The questions asked in the survey offered a choice of five responses: "strongly disagree", "somewhat disagree", "somewhat agree", "strongly agree" and "no opinion". The aggregate of the responses "tend to agree" and "strongly agree" constitutes a positive opinion, and the aggregate of the responses "strongly disagree" and "tend to disagree" constitutes a negative opinion.

Entities concerned: PULLUP Entertainment and Focus Entertainment Publishing

Training

Training means learning the knowledge or skills required to carry out tasks in the company. Raising awareness is excluded from this calculation.

Calculation: Number of employees who attended training / Average workforce over the year concerned x 100

Number of hours of training provided by the company / number of employees who received training

Entities concerned: all

Job vacancies

The time of a vacancy is from first publication to acceptance of the job by the employee.

Only offers for permanent and fixed-term contracts excluding trainees and work-study students are concerned.

Entities concerned: all except Carpool

Calculation: total number of days a job vacancy was open in year concerned / number of job vacancies published in 2023-2024

5.3. Environmental indicators

The carbon footprint includes emissions from all three scopes. Scope 3 is a fairly broad estimate. In addition to transport for distributing games, it includes the impact of the game, for which data is difficult to estimate. Lack of visibility on emissions due to manufacturing games and too much uncertainty about emissions due to use by players means the results and real impact of these issues are to be considered with caution.

Most of the entities are in multi-tenant buildings and do not have electricity or water meters or waste weighing facilities to collect their real consumption. A pro rata calculation is therefore applied according to the square metre of occupancy.

5.4. Governance indicators

Corruption alerts

The alerts come from the whistleblowing system. The entire Group is not yet familiar with the system. Information will be correctly distributed in 2024/2025, with the ethics charter.

Cyber attack

A cyber attack is an intentional effort to steal, expose, modify, disable or destroy data, applications or other assets through unauthorised access to a network, computer system or digital device.

This is an exhaustive list of the types of cyber attacks monitored and recorded by our IT services:

Phishing, Malware (Viruses, Trojans, Spyware, Ransomware, Worms), Denial of Service (DoS) and Distributed Denial of Service (DDoS) attacks, Man-in-the-Middle (MitM), SQL Injection, Cross-Site Scripting (XSS), Zero-Day Exploits, Brute Force Attack, Password Attacks, Credential Stuffing, Password Spraying, Social Engineering, Advanced Persistent Threats (APT), Rootkits, Wireless Network Exploits, Physical Attacks.

6. Irrelevant themes

Expectations include publishing information on the fight against food waste, the fight against food insecurity, respect for animal welfare and responsible, fair and sustainable food.

However, indicators for these issues are not covered in this NFPD as they are not considered relevant to our business. These indicators will be reconsidered every year.

PULLUP Entertainment (formerly FOCUS ENTERTAINMENT)

**A public limited company (société anonyme) with share capital of €10,246,711.20 Parc de Flandre "Le Beauvaisis" - Building 28
11, rue de Cambrai, 75019 Paris, France
399 856 277 RCS Paris**

REPORT OF ONE OF THE STATUTORY AUDITORS, APPOINTED AS AN INDEPENDENT THIRD-PARTY BODY, ON THE VERIFICATION OF THE CONSOLIDATED DECLARATION OF NON-FINANCIAL PERFORMANCE FINANCIAL YEAR ENDED 31 MARCH 2024

At the Shareholders' General Meeting,

In our capacity as statutory auditors of your company PULLUP Entertainment SA (hereinafter "entity"), appointed as an independent third party body ("third party"), accredited by the COFRAC (Accréditation Cofrac Validation/Vérification number 3-1886, scope available on www.cofrac.fr), we have conducted work to provide a reasonable opinion expressing a moderate level of assurance on the historical information (observed or extrapolated) of the consolidated CSR report, prepared in accordance with the entity's procedures (hereinafter the "Audit Framework"), for the financial year ended 31 March 2024 (hereinafter the "Information" and the "Declaration" respectively), presented in the Group management report in accordance with the legal and regulatory provisions of Articles L. 225 102-1, R. 225-105 and R. 225-105-1 of the French Commercial Code.

Conclusion

On the basis of our audit, as described in the "Nature and scope of our work" section, and the information we have obtained, we have found no material misstatement that undermines our belief that Declaration is compliant with the applicable regulatory requirements and that the Information, taken as a whole, is presented fairly, in accordance with the Audit Framework.

Comment

Without questioning the conclusion expressed above, and in accordance with the provisions of Article A. 225-3 of the French Commercial Code, we make the following comments:

- Indicators of the Group's carbon footprint (in teCO_2), Scope 1, Scope 2 and Scope 3, only cover the subsidiaries PULLUP Entertainment, Dotemu, Dovetail and Douze Dixièmes for the financial year ended 31 March 2024.

Preparing the Declaration

The absence of a generally accepted and commonly used reference framework or established practices on which to base the assessment and measurement of Information means that different, but acceptable, measurement techniques may be used, which may affect comparability between entities and over time.

Consequently, the Information must be read and understood with reference to the Audit Framework whose significant elements are presented in the Declaration.

Limits inherent in the preparation of information

The Information may be subject to uncertainty inherent in the state of scientific or economic knowledge and in the quality of the external data used. Certain information is sensitive to the methodological choices, assumptions or estimates used in its preparation and presented in the Declaration.

Responsibility of the entity

Responsibilities of the Board of Directors:

- select or establish appropriate criteria for the preparation of Information;
- issue a Declaration in accordance with legal and regulatory provisions, including a presentation of the business model, a description of the key non- financial risks, a presentation of the policies implemented in the light of these risks, and the results of said policies, including the key performance indicators;
- prepare the Declaration by applying the entity's Audit Framework as mentioned above;
- and implement such internal control procedures as determined necessary to enable the preparation of information free from material misstatement, whether due to fraud or error.

The Declaration was drawn up by the Board of Directors.

Responsibility of the statutory auditor appointed as an independent third-party body

It is our responsibility, on the basis of our audit, to issue a reasoned opinion expressing a conclusion of moderated assurance on:

- the compliance of the Declaration with the provisions of Article R. 225-105 of the French Commercial Code;
- the sincerity of the information provided in compliance with 3° of I and II of article R. 225-105 of the French Commercial Code, i.e. the results of policies, including key performance indicators, and actions relating to the main risks.

As it is our responsibility to form an independent conclusion on the information prepared by management, we are not authorised to be involved in the preparation of this information, as this could compromise our independence.

It is not our role to comment on:

- compliance by the entity with other applicable legal and regulatory provisions;
- compliance of products and services with applicable regulations.

Regulatory provisions and applicable professional doctrine

Our work as described below was performed in accordance with the provisions of articles A. 225 1 et seq. of the French Commercial Code, our own procedures, the professional doctrine of the French national institute of auditors *Compagnie Nationale des Commissaires aux Comptes (CNCC)* applicable to this service, particularly the technical recommendation of the CNCC, *Intervention du Commissaires aux Comptes - Intervention de l'OTI - Déclaration de performance extra-financière*, which provides a verification programme, and international standard ISAE 3000 (revised)⁹.

Independence and quality control

Our independence is defined by the provisions of Article L. 821-28 of the French Commercial Code and the Code of Ethics for Statutory Auditors. We have also implemented a quality control system that includes documented policies and procedures aimed to ensure compliance with applicable laws and regulations, ethical rules and the professional doctrine of the CNCC for this activity.

Means and resources

The skills of three people were dedicated to this audit between May and July 2024 for a period of three weeks. We also consulted our specialists in sustainable development and corporate social responsibility. We conducted around ten interviews with the people responsible for preparing the Declaration.

Nature and scope

We planned and performed our audit taking into account the risks of material misstatement of the Information.

We believe that procedures we performed in the exercise of our professional judgement enable us to provide a moderate level of assurance:

- We examined all the companies included in the scope of consolidation and the descriptions of the main risks.
- We assessed the appropriateness of the Audit Framework in terms of its relevance, completeness, reliability, neutrality and understandability, taking into account industry best practice when appropriate.
- We verified that the Declaration covers each category of information required by paragraph III of Article L. 225-102-1 of the French Commercial Code relating to social and environmental matters and includes, where applicable, an explanation of the reasons for the absence of the information required by paragraph 2 of III of Article L. 225-102-1 of the French Commercial Code.
- We verified that the Declaration includes the information required under II of Article R. 225-105 of the French Commercial Code, where such information is relevant to the principal risks.
- We verified that the Declaration presents the business model and a description of the principal risks associated with the business of all entities included in the scope of consolidation, including, where relevant and proportionate, the risks created by its business relationships, products or services, and the policies, actions and results, including key performance indicators relating to the principal risks;
- We consulted documentary sources and conducted interviews to:
 - assess the process for selecting and validating the main risks and the consistency of the results, including the key performance indicators selected in relation to the main risks and policies presented; and
 - corroborate the qualitative information (actions and results) we considered most important¹⁰.
- We verified that the Declaration covers the consolidated scope, i.e. all the companies included in the scope of consolidation in accordance with Article L. 233-16, with the limits specified in the Declaration.
- We familiarised ourselves with internal control and risk management procedures implemented by the entity and assessed the data collection process aimed at ensuring the completeness and accuracy of the information.
- For the key performance indicators and other quantitative results we considered most important¹¹ we used:
 - analytical procedures to verify the correct consolidation of the data collected and the coherence of any changes;
 - tests of detail on the basis of sampling or other means of selection, consisting of verifying the correct application of definitions and procedures and reconciling data with supporting documents.
- We assessed the overall consistency of the Declaration in relation to our knowledge of all the entities included in the scope of consolidation.

⁹ ISAE 3000 (revised) - Assurance engagements other than audits or reviews of historical financial information

¹⁰ Climate change and carbon footprint

¹¹ **Environmental data:** Electricity consumption/employees; Water consumption/employees; Percentage of electricity from renewable sources.

Social data: Attrition rate in %; No. of hours of training provided by the company.

Social data: percentage of online games with a ban system; Percentage of employees made aware of the risk of data leaks.

The procedures performed as part of a moderate assurance engagement are less extensive than those required for a reasonable assurance engagement performed in accordance with the professional doctrine of the CNCC; a higher level of assurance would require more extensive verification.

Paris - La Défense, 22 July 2024

One of the Statutory Auditors,

Deloitte & Associés

Julien Razungles
Partner

Hélène De Bie
Partner