

This statement outlines the measures taken during the fiscal year ended December 31, 2021 to combat all forms of slavery and human trafficking. It applies to the business activities of Orange SA and its subsidiaries, particularly Globecast UK Limited, Orange Brand Services Limited, Orange Business Services Australia Pty Ltd., Orange Cyberdefense UK Ltd and Orange Business Holdings UK Limited (hereinafter referred to collectively as “Orange”), and their relationships with suppliers.

Orange is a group that includes Orange SA – the parent company, which is a French public limited company (Société Anonyme) – and subsidiaries and shareholdings located in France and 26 other countries that are mainly in Europe, Africa and the Middle East. Orange is one of the world's leading telecommunications operators, with revenue of 42.5 billion euros in 2021 and 140,000 employees worldwide at December 31, 2021, including 78,000 in France. Orange had a total of 271 million customers worldwide at December 31, 2021, including 224.3 million mobile customers and 23.5 million broadband customers.

Orange is also a leading provider of global IT and telecommunication services to multinational companies, under the brand Orange Business Services. The company has around 58,700 suppliers and subcontractors all over the world, primarily in Europe, Asia and Africa.

As regards Australia, the business relates to the enterprise side where Orange Australia procures hardware, software, connectivity and telecommunication services and utility and maintenance services.

This statement forms part of Orange's new Engage 2025 Strategic Plan and the corporate purpose unveiled in December 2019. This new strategy is based on the idea that economic performance is achieved by leading by example on social and environmental issues. It aims to prepare the route to a sustainable and responsible transformation, in order to monitor the social and human cohesion of the Group's projects worldwide. The Group's commitment is reflected in the Sustainable Development Goals (SDGs) set by the United Nations Member States. Orange has also created the following purpose: “As a trusted partner, Orange gives everyone the keys to a responsible digital world. Our mission is to ensure that digital services are well thought-out, made available and used in a more caring, inclusive and sustainable way in all areas of our business. Orange does everything in its power to ensure people and organizations enjoy a more autonomous and secure digital life. Through the engagement and expertise of the Group's teams, Orange employs innovative technologies and services everywhere, and for everyone.” This purpose was approved by Orange's Shareholders' Meeting on May 17, 2020, and is included in Orange's Bylaws.

In 2019, Orange shored up the governance related to the direction and implementation of Orange's Corporate Social Responsibility (CSR) and to the approval of the CSR information disclosed by the Group. This updated governance approach, which took effect in 2020, has helped Orange to better determine the different levels of the Company that contribute to formulating, approving and controlling risks, and effectively implementing the prevention, mitigation or repair measures, particularly with regard to human rights violations. The implementation of the Modern Slavery Act (i.e., the UK Modern Slavery Act 2015 and Australian Modern Slavery Act 2018 (Commonwealth)) is incorporated into this governance.

Under this framework, the following governance bodies provide guidance and assist with decision-making within the Group in the area of violations of human rights and fundamental freedoms:

**The Governance and Corporate Social and Environmental Responsibility Committee (GCSERC)** is a special committee of the Board of Directors which, in the context of Corporate Social Responsibility (CSR), examines social and environmental information, including the statement on modern slavery and human trafficking. It examines the Vigilance Plan before it is sent to the Orange Board of Directors for approval.

**The Ethics and Sustainable Performance Committee**, one of the Executive Committee's internal governance committees comprised primarily of senior executives, had its responsibilities extended to monitoring the Group's non-financial performance in July 2019.

**The CSR & Procurement Steering Committee**, made up of representatives from the Group CSR and Purchasing Department, meets at least once a year.

## 1. Policies implemented to combat modern slavery and human trafficking

### Orange's commitments

Combating slavery and human trafficking is part of the policy that Orange implements to respect and promote human rights. This policy is reflected in various commitments:

- Orange was one of the first companies to sign the **United Nations Global Compact in 2000, and it signed it again in 2021**, thus affirming its commitment to respecting and promoting fundamental human rights in its activities and within its sphere of influence.
- Respect for the fundamental principles set out in the Universal Declaration of Human Rights and by the International Labour Organization also explicitly features in the **Group's Code of Ethics**<sup>1\*</sup>. This document sets out the Group's principles of action with regard to its customers, shareholders, employees, suppliers and competitors, as well as all other stakeholders in the countries where the Group operates.
- In 2006, Orange strengthened its commitment by signing a **global agreement with the UNI Global Union**. Through this agreement, Orange reaffirmed its commitment to respect fundamental human rights, both internally and in its relations with its suppliers and subcontractors.
- Orange also published a **report entitled "Orange and Human Rights"**<sup>2\*</sup> for 2016, prepared according to the United Nations Guiding Principles on Business and Human Rights, in line with the expectations of stakeholders. With respect to human rights issues, this document presents the Group's approach, its awareness-raising tools and internal procedures ensuring both the implementation of commitments in all entities and the dialog processes with stakeholders.
- Orange also takes part in the ILO platform on child labor, which returned its work in June 2021.
- As a signatory to the United Nations Guiding Principles, Orange contributed to discussions as part of the UN Working Group on Business and Human Rights (UN BHRWG) on the new framework ("UNGPs 10+") to be put in place after ten years of applying the Guiding Principles. Orange shares the United Nations' analysis on the effective implementation of the Principle of "protection of human rights" by public authorities and the Principle of "respect for human rights" by companies. Orange proposes to set up an analysis of the sharing of responsibility between public authorities and companies prior to the implementation of a Principle of "reparation" yet to be developed.

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<sup>1\*</sup> The Group's Code of Ethics is available online at:

[https://www.orange.com/sites/orange.com/files/documents/2020-09/CHARTE-DE-DEONTOLOGIE\\_03-10\\_VA.pdf](https://www.orange.com/sites/orange.com/files/documents/2020-09/CHARTE-DE-DEONTOLOGIE_03-10_VA.pdf)

<sup>2\*</sup> The "Orange and Human Rights" report is available online at: <https://gallery.orange.com/rse/media/da20cfac-4efe-4729-b40f-26ff322dc883#v=Version1&l=en&p=10>

The Group is also **subject to French Law no. 2017-399 of March 27, 2017 on the duty of vigilance of parent companies and ordering companies** (hereinafter: the “law on the duty of vigilance”), whose scope is broader than that of the UK Modern Slavery Act and Australian Modern Slavery Act 2018. This law draws on the Guiding Principles of the United Nations and OECD aimed at multinational companies. It requires the implementation of reasonable vigilance measures that help identify risks and prevent and mitigate serious violations related to the health and safety of persons, the environment, and human rights and fundamental freedoms (including combating modern slavery). On the one hand, its scope extends to risks and violations that may result from the activities of the Group, its subsidiaries or the companies it controls. On the other, it also encompasses the activities of its subcontractors or suppliers with which it maintains an established business relationship, and therefore to its supply chain. These measures are outlined in **Orange’s 2022 Vigilance Plan**, which will be posted on the Orange website before the Annual Shareholders’ Meeting scheduled for May 19, 2022.<sup>3\*</sup>

In addition, Orange has been strongly committed to promoting freedom of expression and respect for privacy in the ICT sector as part of the **Global Network Initiative** (GNI)<sup>4\*</sup>.

Orange works to promote human rights and fundamental freedoms and publicly defends their values, particularly with regard to the responsibility it intends to assume in respect of its supply chain:

As a member of EDH (Entreprises pour les Droits de l’Homme), Orange continued its dialog with NGOs and social partners during 2021 on the themes of respect for human rights, particularly forced labor.

Orange presented the progress of its thinking and shared its practices:

- at a round table organized in April 2021 by BSR (Business for Social Responsibility) and the ERB Institute “EMEA round table about the Future of Sustainable Business.” Orange highlights its transparency in the matter and the constant need to challenge civil society to ensure respect for continuity of service without discrimination.
- during FIFAfrica21 in September 2021 at a session dedicated to this topic, alongside the United Nations Special Rapporteur, academics, and public authorities.
- in an academic setting with the University of Oxford in October 2021.
- by helping to outline human rights-related standards with the GRI.

Finally, combating modern slavery and human trafficking is a component of Orange’s commitments and actions to promote and respect human rights, in both its activities and its supply chain.

### **Orange’s internal policies**

When it comes to human rights, Orange’s actions focus on specific areas and stakeholders, namely:

- **respecting Orange employees’ and contractors’ fundamental rights**
- **promoting respect for human rights among suppliers and subcontractors**

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<sup>3\*</sup> Orange’s 2022 Vigilance Plan will be available online at: <https://gallery.orange.com/#o=custom&v=9396b6eb-b3bd-4fdb-8be7-ca877ed041a8>

<sup>4\*</sup> This is a multi-stakeholder platform that includes Internet operators, NGOs, academics and socially responsible investors that come together to discuss best practices when it comes to government telecommunications requirements.

## Social Domain

In addition to the global agreement on fundamental rights for workers referred to above, there are targeted policies that back up commitments on occupational health and safety, diversity, and equal opportunities.

Orange formalized its Diversity Policy in December 2012 for the Group. This policy pinpoints gender equality in the workplace as the area common to all Orange's entities worldwide and states that each country is responsible for choosing at least one other aspect of diversity that corresponds to its economic and social challenges, such as the inclusion of people with disabilities.

On July 17, 2019, Orange signed a worldwide agreement with UNI Global Union on gender equality in the workplace, combating discrimination and violence, and the work-life balance. This agreement, which can be applied and adapted in the countries where Orange operates, is based on a participatory approach by all stakeholders and is built through structured social dialog and oversight by the Group, relying particularly on dedicated local committees.

In France, there are several mechanisms in place to combat discrimination: a dedicated oversight committee with the trade unions; the Allodiscrim service (outside Orange), which allows employees and external hiring candidates to report incidents of discrimination so they can be addressed; and the "equality in the workplace certificate," which educates employees about stereotypes.

**Representative forums for social dialog** have also been set up to allow employees to discuss specific topics. Such dialog has taken place at different levels – national, European, and global – including:

- Employee representative bodies,
- European Works Council,
- Worldwide Works Council.

## Responsible purchasing policy

Orange has for several years implemented a **responsible purchasing policy**<sup>5</sup> which embeds CSR in its supplier relationships and improves control of risks, including human rights risks.

This policy is implemented by the Global Procurement & Supply Chain Department, which is part of the Orange Group Finance & Performance Department, and which ensures consistency among all Group companies, each of which has its own purchasing department. Thus, more than 1,500 permanent employees in 50 countries and territories conducted negotiations with 58,700 active suppliers in 2021. A key event for dialog with suppliers is organized annually during the "Supplier Forum."

The Group-level CSR action plan aims to promote the appropriation of CSR commitments by the various purchasing stakeholders and their application in the relevant business processes, and to ensure the Group's compliance with the law on the duty of vigilance. All of these principles have also been adopted by BuyIn, the joint venture between Orange and Deutsche Telekom, which covers the Group's main purchasing domains.

This policy was updated in 2018 (available at [gallery.orange.com](https://gallery.orange.com)) and is based on the following guidelines:

- developing balanced relationships with suppliers, based on trust, respect and sustainable business relationships;
- contributing to financial performance by creating value and ensuring the availability of products and services at the best cost, while preserving competition among Orange's strategic suppliers by establishing an industrial policy that protects the interests of stakeholders;
- managing CSR risks and opportunities related to purchasing and the supply chain by requiring Group suppliers to adhere to a code of conduct and comply with laws and regulations; and

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<sup>5</sup> The responsible purchasing policy is available online at: <https://gallery.orange.com/rse/media/a2f76560-01b9-11e8-972c-83699ad7b55f#v=Version1&l=en>

- providing the Group and its customers with the benefit of the know-how of innovative and high-performance suppliers.

Finally, Orange has tools, described in Chapter 2 below, that it implements to assess and audit its suppliers on their CSR policies, and particularly their respect for human rights, which includes the prohibition on modern slavery and human trafficking.

## 2. Identifying risks related to slavery and human trafficking in Orange's supply chain and activities

### Human rights impact assessments and remediation

Since 2012, through Verisk Maplecroft <sup>6\*</sup>, a specialist external firm using a methodology based on United Nations and OECD standards, Orange has prepared a customized assessment of the risks incurred in terms of respect for human rights in each of the countries where Orange is an operator. Orange determines more precisely the criteria corresponding to its assessment of the human rights risks incurred as a result of its activities and geographies. As such, 14 dimensions of human rights are considered in the form of risk criticality indexes to provide an aggregate rating, country by country. They cover the stability of the countries in terms of the degree of corruption, democratic governance, the power of the judiciary in its scope and effectiveness, as well as respect for the rights of minorities, indigenous people, children, and women, since 2020 they have also included the aspects of government stability and civil unrest.

They are supplemented by more specific aspects as an operator of critical infrastructure: digital inclusion, freedom of opinion and expression and, in the face of the multiplicity of government injunctions, interception of communications or cut-off of telephone service or Internet access. As an employer and ordering company in its supply chain, the criterion of discrimination against employees is added.

In its 2021 assessment, Verisk Maplecroft made the following observation, which led Orange to adapt its assessment of the risks in terms of respect for human rights and fundamental freedoms for 2021: the occupational rights indexes have seen a decline over the past five years which has been particularly acute in countries with mass industrial production. Many dimensions are affected, such as modern slavery, child labor, discrimination, workplace health and safety, and decent wages. Accordingly, a number of primary manufacturing centers in Southeast Asia were downgraded by Verisk Maplecroft to "extreme" risk in the modern slavery index. According to Verisk Maplecroft, the human rights of citizens in 40% of the top 100 locations in which direct foreign investments are concentrated worldwide are at "high" or "extreme" risk, which represents some 1.4 billion people and at least one-tenth of invested sums. More specifically, the province of Xinjiang was identified as having used forced labor for the manufacture of mobile phones.

Orange's approach is to rethink its use of new equipment by favoring the recertification of existing technical equipment by local companies, and to forge partnerships with some of its suppliers to tighten control of its requirements throughout its technical equipment value chain. In fact, the approach of prioritizing countries which pose less of a risk in this dimension of human rights, and also other dimensions of social responsibility, is ineffective in terms of application, because the manufacturing locations for essential parts still remain very limited worldwide.

The 2021 impact study on human rights carried out for the entire Orange operator scope, with the help of scores attributed by Verisk Maplecroft, highlighted four geographical areas where Orange has a presence as requiring ongoing attention in terms of the respect of human rights and fundamental freedoms. They are Mali, the Democratic Republic of Congo, the Central African Republic and Guinea. In total, 1,749 people are directly employed by Orange in these four countries to serve more than 23.5 million customers. Five countries are assessed by the firm as also requiring special attention in terms of human rights and fundamental freedoms. They are Guinea-Bissau, Cameroon, Egypt, Burkina Faso and Madagascar. A total of 7,886 people are directly employed by Orange in these countries to serve more than 50.2 million customers.

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<sup>6\*</sup> <https://www.maplecroft.com/>

The Orange Foundation is present in the following countries considered to require attention: Burkina Faso, Cameroon, Mali, Guinea and Madagascar. It provides support to populations there through programs dedicated primarily to women and young people, in the areas of health and education.

Any potential or actual breaches of human rights and fundamental freedoms that Orange may have caused are then taken into account in **its Vigilance Plan, which it updates every year**, in accordance with the law on the duty of vigilance.

Every year, the Orange Group creates a risk map using the Group's **risk management method**, incorporating duty of vigilance risks that apply to the areas addressed by the law, namely: human rights and fundamental freedoms, personal health and safety, and the environment.

This process has produced four specific clusters, or groups of risks, which are updated annually and incorporated into the Company's overall risk map that is also created. The various risks, their consequences (impact) and causes (probability) should they arise, and the main hedging mechanisms and action plans are defined for each of these clusters.

One of the new clusters concerns potential violations of human rights and fundamental freedoms and names the following risks:

- Modern slavery or human trafficking within the framework of a known established contractual relationship
- Non-decent working conditions at suppliers and subcontractors: compensation that does not allow an adequate standard of living, right to rest, etc.
- Breach of a child's rights to a harmonious education and development: prohibition of child labor, protection against content unsuitable for a young audience
- Infringement of freedom of association and the right to collective bargaining on working conditions
- Any act of discrimination: recruitment, work, salary, diversity, unfair procedures
- Breach of freedom of expression (in civil society)
- Violation of privacy

**2022 internal control and monitoring indicators for the cluster addressing potential violations of human rights and fundamental freedoms.**

For each risk in the cluster, a monitoring indicator has been chosen to measure the progression of the impact of risk mitigation actions over the years:

	<b>Risk</b>	<b>Governance</b>	<b>Indicator</b>
Violations of human rights and fundamental freedoms	1. Modern slavery or human trafficking within the framework of a known established contractual relationship	GCSERC Ethics Committee CSR & Procurement Steering Committee	Number of action plans in the areas handled by the Joint Alliance for CSR (JAC)
	2. Non-decent working conditions at suppliers and subcontractors: compensation that does not allow an adequate standard of living, right to rest, etc.	GCSERC Ethics Committee CSR & Procurement Steering Committee	Number of action plans in the areas handled by the Joint Alliance for CSR (JAC)
	3. Infringement of the child's right to harmonious education and development: prohibition of child labor, protection against content unsuitable for a young audience	GCSERC Ethics Committee CSR & Procurement Steering Committee	Number of action plans in the areas handled by the Joint Alliance for CSR (JAC)
	4. Infringement of freedom of association and the right to collective bargaining on working conditions	GCSERC Ethics Committee CSR & Procurement Steering Committee	Number of action plans in the areas handled by the Joint Alliance for CSR (JAC)
	5. Any act of discrimination: recruitment, work, salary, diversity, unfair procedures	GCSERC Ethics Committee CSR & Procurement Steering Committee	Number of action plans in the areas handled by the Joint Alliance for CSR (JAC)
	6. Breach of freedom of expression (in civil society)	GCSERC Ethics Committee CSR Department	Number of disconnection requests received from authorities

In Australia, the supply chain consists of supplier engaged in manufacture of hardware and software, IT procurement and providers of utilities and maintenance services. These supply lines may have a higher risk of modern slavery.

An exercise is underway in Orange Australia to create a modern slavery risk profile of its suppliers and evaluating its supplier's compliance with the requirements of the Australian Modern Slavery Act.

Orange Australia has also been reaching out to its major suppliers requesting a copy of their own modern slavery statement in order to ascertain their compliance with the Australian Modern Slavery Act.

### 3. Steps taken to mitigate or prevent risks of violating human rights

#### Actions with suppliers

Orange requires that its partners, suppliers and their subcontractors comply with all national, European and international rules with respect to ethical and responsible behavior. These standards include, in particular, **human rights**, environmental protection, sustainable development, **child protection, and combating modern slavery and human trafficking**.

Orange promotes these standards to all its suppliers when making purchases and selects them through a **structured seven-step process**. The process consists of using various tools to assess suppliers both when they are listed and throughout the life of the contract.

First of all, they are assessed on a documentary basis thanks to the use of a recognized expert, which offers a self-assessment tool based on ISO 26000 for supplier commitment in terms of CSR. The results of the assessment are used to prioritize the actions toward the most vulnerable suppliers from a CSR standpoint.

Orange Australia has also prepared a questionnaire which seeks information from the Supplier's on modern slavery compliance and used for assessment of the suppliers. Orange Australia is prioritizing the process of sending the questionnaire first to those suppliers whom it feels may have a higher risk of modern slavery.

Then, Orange's suppliers are assessed through on-site audits by an expert partner company either within the framework of the JAC, or only on behalf of Orange in collaboration with its subsidiaries. Orange deploys a coordinated program of on-site CSR audits founded on verification, assessment, and the development of a common methodology. Audits to assess suppliers' compliance with social and environmental accountability standards (SA 8000, ISO 14001) and, where necessary, to implement corrective action plans.

In addition to the maturity assessments carried out by the BuyIn joint venture (defined below) on the Group's main suppliers (network equipment, IT software and hardware, customer devices, and service platforms), since 2019 Orange has created a new assessment program for local suppliers, which is gradually being integrated by the subsidiaries. Its main objective is to increase the visibility of suppliers' CSR performance in order to better mitigate risks and support those who need to strengthen their efforts in this area.

This initiative involves assessing the CSR maturity of suppliers belonging to the high CSR risk category and presenting a significant annual order value. In order to guarantee the independence and quality of the CSR analysis, supplier assessments were entrusted to a partner recognized in this field, whose methodology is based on international CSR standards and guidelines such as the Global Compact, ISO 26000, ILO or GRI.

In 2021, this initiative was extended to new entities: Orange Egypt, Orange Côte d'Ivoire, Orange Morocco, Orange Bank, who joined the entities already involved, including Orange France, Orange Spain, Orange Slovakia, Orange Moldova, Orange Jordan, Orange Cameroon, Orange Madagascar, Orange Poland, Orange Romania, Orange Belgium, Sonatel in Senegal and OBS. To ensure the rollout, training has continued as well as the sharing of best practices between the subsidiaries.

As part of the program, 180 assessments were carried out among existing suppliers in 2021, including 100 suppliers assessed by France. Fifty-seven suppliers were identified as requiring improvements in CSR performance. For these suppliers, Orange entities systematically request corrective action plans and monitor them.

In France, the process continued in 2021. A new assessment (or reassessment) campaign was conducted on suppliers in the high CSR risk purchasing categories, under local or Group contracts. The first corrective action plans were requested and monitored over the year 2021. At the same time, for consultations for high CSR risk purchasing categories, a CSR maturity assessment was requested. In addition, specific additional questionnaires may be sent out on certain Orange CSR requirements during these consultations.



In 2022, Orange Australia will conclude the exercise of review and assessment of its supply chain in Australia for modern slavery risks which it had started in 2021. Orange Australia will continue to seek information from existing and new suppliers through a questionnaire in order to ascertain the applicability of and compliance with Modern Slavery Act.

BuyIn, a joint venture created by Orange and Deutsche Telekom in 2011 to consolidate the two international groups' strategic purchasing so as to use the Group's main suppliers (network equipment, IT software and hardware, customer devices, and platforms and services), also conducts maturity assessments on its main suppliers using the method outlined above.

Orange reviews the findings from the information received from its suppliers and from the supplier audits. Where problems are identified Orange work with the supplier to develop corrective actions with agreed timeframes as part of the remediation plan. Orange work constructively on the corrective actions, and review evidence provided, to justify closing the issues and findings.

Orange also promotes its CSR standards through a **contractual commitment from suppliers in the form of a Supplier Code of Conduct**. It was revised in 2017 and has been appended to all new contracts since 2018, making it mandatory. The Code of Conduct sets out the social and societal commitments that the Group expects with regard to fundamental human rights: compliance with the fundamental conventions of the International Labor Organization (ILO) on human trafficking, child labor, freedom of association, combating discrimination, and working conditions (working hours, pay, disciplinary practices).

In addition, the CSR clause – available in English and French – was revised in 2018. It has since been included in all Group framework purchasing contracts, as well as in local purchasing contracts. A special training program has been developed for this purpose.

In addition, in 2020 a working group drafted a CSR clause with slight variations compared to the one used in purchasing contracts. The new clause will be included in all other Orange contracts (for partnerships, distributors, operators, customers, etc.), and has been widely disseminated within the Group.

Both the CSR clause that is inserted into the purchase agreements and the one that appears in the other agreements explicitly state that each party agrees – and requires that its co-contracting parties, subcontractors and any legal entity under its control agree – (i) not to use modern slavery, child labor or human trafficking, and (ii) to combat all forms of discrimination.

In 2021, Orange Australia inserted a clause in its standard purchase agreements for all new suppliers requiring that suppliers comply with Australian Modern Slavery Bill 2018. At the request of Orange Australia, suppliers will be obligated to provide information on the measures and controls implemented to ensure compliance. In addition, a breach of this clause by the supplier will constitute a material breach of the agreement. In 2022, this clause will be incorporated into the agreements with existing suppliers.

### **Respect for human rights in conflict zones**

Orange recognizes the legitimacy of concerns about sourcing materials from regions plagued by political and social conflict, and is committed to using a **socially responsible supply chain**. However, the supply chain for these minerals is long and complex, involving many players. Orange does not purchase minerals directly, and ensures that its suppliers have performed due diligence to avoid using minerals that may directly or indirectly finance armed groups. As such, Orange requires its **suppliers by contract** to ensure that they themselves do not use minerals from these areas. This obligation is explicitly included in its Code of Conduct, which is appended to all purchasing contracts, and in the CSR Clause included in such contracts with the suppliers' signature to "Orange's Responsible Purchasing Commitments."

Orange also ensures that this contract clause is correctly followed by its suppliers. Supplier evaluations by **EcoVadis** consider the issue of non-use of conflict minerals. The same applies to the audits carried out by the **JAC**, especially those carried out on site, which have a checkpoint on the procedure to ensure the traceability of minerals. Non-compliance on that point results in **corrective actions and their follow-up**.

### Audits conducted by the JAC

Orange also embodies its commitment to combating modern slavery by promoting these principles in its sphere of influence, among its suppliers and subcontractors, through the actions of the **JAC**.

The **JAC** (Joint Alliance for CSR) is an organization that was created in January 2010 at the initiative of Orange, Deutsche Telekom and Telecom Italia, and it currently includes 18 telecommunications operators around the world.

The JAC's member operators pool their resources in order to promote CSR principles to suppliers in the sector, based on a shared reference framework which includes guidelines and a shared audit methodology. These audits assess suppliers' compliance with social and environmental accountability standards (SA 8000, ISO 14001) and, where necessary, provide the groundwork for implementing corrective action plans.

The purpose of the JAC guidelines is to make it easier for suppliers to meet the shared CSR expectations, and to provide support for their implementation throughout the audit and monitoring process. The JAC's questionnaires include 146 items, divided into four areas (social (49), health and safety (49), ethics (29) and environment (19)).

To boost the impact of these audits, in 2016 the JAC also launched a **pilot telephone audit** with the support of an NGO. This untested method was used alongside traditional audit methods to anonymously and transparently gather employee, supplier and subcontractor testimonials under various categories, including wages, discrimination, child labor, etc.

In 2021, the JAC conducted 71 audits, including 53 on-site audits carried out directly by the JAC, ten using the VAP & FLA standard (Validated Assessment Program, Fair Labor Association) and eight audits via the JAC remote protocol. The JAC also carried out 17 investigations among workers, specifically on their working conditions. These actions made it possible to reach the level of tier-two and tier-three suppliers (65% of audits and investigations).

The JAC's actions in 2021 resulted in 402 corrective action plans, of which 43% addressed occupational health and safety requirements, 23% other working conditions, 18% excessive working hours and 16% the environment, affecting about 107,150 employees. In 2021, 643 action plans relating to the current year or previous years were closed.

Since 2010, the JAC has conducted a total of 812 audits in 40 countries (84% of the audited production facilities are located in Asia), improving the working conditions of around 1.4 million employees.

The on-site audits were conducted in the following 16 countries and regions: Australia, Brazil, China, Czech Republic, India, Indonesia, Israel, Mexico, Morocco, Peru, Russia, Taiwan, Tunisia, Vietnam, the Philippines and South Korea. Most of the audits (around 85%) were done in Asia, followed by Europe (5%), Latin America (4%), Oceania (4%) and Africa (1%).

Between 2010 and 2021, the members of the JAC found 5,145 incidents of non-compliance with the CSR standards and closed 4,892 cases with corrective action plans covering:

- Occupational health and safety (43%)
- Number of hours worked (14%)
- Lack of environmental measures (13%)
- Child labor (3%)
- Discrimination (4%)

- Wages and Compensation (7%)
- Business ethics (12%)
- Forced labor (2%)

For example, for these incidents of non-compliance (417) regarding forced labor, the auditors found cases where employees could not freely terminate their employment contracts, unjustified withholding of wages, restrictions on freedom of movement, use of surveillance cameras for disciplinary purposes without notifying employees in advance, many cases where workers did not receive their signed employment contract or work card, and employment contracts with trial periods that were much longer than those stipulated by regulations.

To remedy these cases, the corrective action plans stipulated the obligation to give employees their signed contracts, the formulation of a clear policy on using surveillance cameras, the establishment of trial periods in accordance with the law, the outlining of actions regarding staffing firms, the provision of the work card, and more.

The JAC has approached institutions including the ITU (International Telecommunication Union), BSR, CDP (Carbon Disclosure Project), RMI and GSMA to adopt standards for other CSR priorities such as climate change, the circular economy and the traceability of minerals from supply sources that respect human rights and the environment.

Moreover, the JAC aims to welcome other telecom operators so that it can expand its geographic coverage (in Asia, South America and Africa), thus indicating the global nature of its commitment.

Finally, as part of the JAC, a Human Rights Working Group was created in February 2021. Initial work focused on the subject of forced labor, with questioning of suppliers by the operators, based on the report of the Australia Strategic Policy Institute (ASPI) which described the forced labor allegations and concerns of the Uyghur people and other ethnic minorities in and from Xinjiang. Of the 35 suppliers questioned by the eight members of the JAC (including Orange), 29 provided proof of due diligence, either because they did not use suppliers in or from Xinjiang, or an audit did not provide any proof of forced labor associated with the factories named in the ASPI report, or because corrective measures had been taken (including banning the use of certain providers). The work of the JAC continues on follow-up of corrective action plans and for suppliers who are yet to respond. The next subject to be tackled by this working group will be child labor.

#### 4. Whistleblowing and reporting system

A Group whistleblowing system has been instituted and covers violations related to corruption, the environment, human rights and fundamental freedoms, as well as personal health and safety. Until May 2021, people both inside and outside the Orange Group could report incidents by sending an email to [deontologie.alerte@orange.com](mailto:deontologie.alerte@orange.com).

**In June 2021, Orange migrated** to a web platform known as “Hello Ethics.” This secure web platform for collecting and processing whistleblowing reports provides an international, centralized service that is available 24 hours a day, 7 days a week. It is easily identifiable and accessible both internally and externally via the Internet, and it complies with legal and regulatory requirements. This service allows for customized management of the Group whistleblowing systems, and those of the subsidiaries that have joined them, using the same process for collecting and processing reports. A communication plan has been set up to promote the new platform.

Hello Ethics receives all reports on corruption, conflicts of interest, fraud, ethical breaches, serious environmental violations, serious violations of human rights and fundamental freedoms, serious violations of the health and safety of persons, and other infringements of laws and regulations.

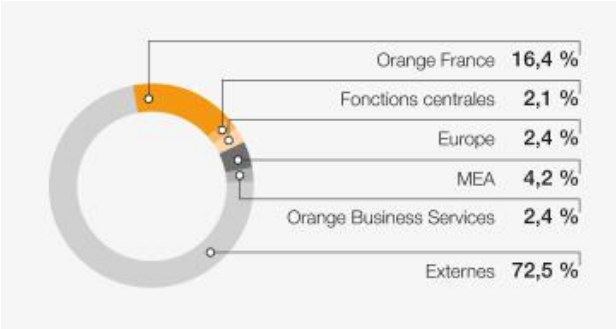
In addition to submitting reports, Hello Ethics users can ask general or specific questions of Orange experts on topics related to Ethics, Compliance and CSR. For some regions where Orange operates, alerts forwarded by channels other than the platform may be entered directly into the tool, although the use of the Hello Ethics platform is encouraged through the communication plan.

Reports are processed according to the procedure laid down by the Group or its subsidiaries: acknowledgment of receipt, review of the admissibility of the report and processing by teams authorized according to the area, while respecting the confidentiality of the whistleblower and the people concerned throughout the process.

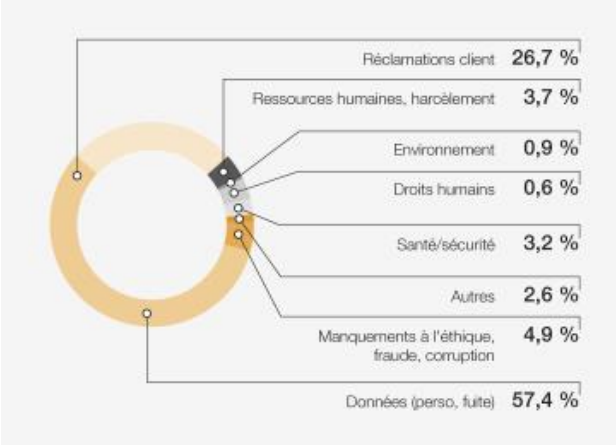
As well as having access to the Group whistleblowing systems, in the UK, Orange Brand Services Limited operates a ‘Speak Up’ policy (formerly the Whistleblowing policy) providing guidelines on the disclosure of information relating to suspected wrongdoing, such as misconduct or alleged dishonest or illegal activity, at work in a confidential manner. As well as providing internal mechanisms for reporting concerns, the policy, in accordance with English law, also sets out guidance for reporting to an independent external body, in the company’s case, an independent whistleblowing charity, Project.

The areas experiencing a significant increase are related to customer complaints and data protection; their breakdown by origin of the issuer and by themes covered in 2021 are as follows:

**Distribution of alerts by entity**



**Distribution of alerts by field**



## 5. Outreach, training and sharing of best practices

### Employees

Since 2016, Orange has been delivering an **e-learning program for employees** developed as part of its participation in the EDH (Entreprises pour les Droits de l'Homme) association. It is available on the Intranet in both English and French, and it enables employees to identify human rights-related issues in their day-to-day activities as well as the most high-risk areas and activities, and to develop good instincts.

Outside of health crisis periods, **specific in-person training** is provided to employees directly affected by these issues (e.g. those working in CSR, ethics, compliance, purchasing and the logistics chain). Since 2018, representatives from the Group's CSR Department have visited various subsidiaries in the Europe and MEA regions to raise awareness on issues and domains covered by the Vigilance Plan, including human rights and fundamental freedoms.

In 2020, Orange rolled out a **CSR certificate** for all Group employees. The certificate program raises awareness of CSR principles and the themes of the Engage 2025 Strategy, specifically digital inclusion and the environment. These themes tie in with human rights, environmental and sustainable development risks. The certificate program first became available in French and English, and Polish and Spanish versions were introduced in the first quarter of 2022. An Arabic version is currently being considered.

In addition, Orange has taken a proactive approach by offering **training for buyers on the CSR clause** in 27 countries by the Group's Purchasing Department. The training provides procurement managers and buyers with the necessary skills to easily negotiate CSR clauses with co-contracting parties.

The Orange Group and BuyIn's purchasing network also has **training on the Supplier Code of Conduct**.

Furthermore, an e-learning **awareness-raising program** on the Code of Ethics principles of action and individual behavior is helping to foster a rights-respecting corporate culture.

A total of nearly 140 training modules are now listed on CSR themes or related to health and safety or business ethics. The modules are offered in person or via e-learning and are categorized according to three levels of learning: introductory, practice or advanced. They cut across social, societal and environmental issues as well as socio-economic ones.

Finally, two new training modules on the duty of vigilance were launched in 2021. These will be incorporated into Orange Learning, Orange's internal training platform. These training programs supplement the CSR certificate program. These modules will be available in the first quarter of 2022.

The **JAC Academy** was launched in 2018 as part of a drive toward continuous improvement and to develop equivalent CSR standards for supply chains.

The Academy enables the JAC's methodology to be cascaded down to suppliers. Its purpose is to raise suppliers' awareness and to train them on the JAC's audit methodology as described above. Once trained, suppliers must carry out their own production site audits and feed the results back to the JAC. Suppliers have established indicators to measure the CSR performance of their production sites.

The indicators and audit reports which the JAC receives are analyzed to identify the main issues which arose, and best practices will be shared at the quarterly thematic JAC seminars. This process encourages suppliers to work together on the continuous improvement of CSR policies and approaches.

Since 2018, the work of the Jac Academy has helped enhance the effectiveness of the Jac's action through this accreditation program for its suppliers trained in its on-site audit methodology.

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In order to prepare this joint statement, Orange SA engaged and consulted with its subsidiaries, including particularly Globecast UK Limited, Orange Brand Services Limited, Orange Business Services Australia Pty Ltd., Orange Cyberdefense UK Ltd and Orange Business Holdings UK Limited , that are covered by this statement and discussed requirements under the Modern Slavery Act and steps that need to be taken in mitigating moderns slavery risks.

This statement is published in accordance with Section 54 (1) of the UK Modern Slavery Act and Section 13 of Australian Modern Slavery Act 2018. It was approved by the Orange SA Board of Directors' Meeting of February 16, 2022.

It is drafted in French and English.

A handwritten signature in black ink, appearing to read 'SR', with a stylized flourish extending to the right.

Stéphane Richard

Chairman of the Board of Directors