

ORANGE'S STATEMENT ON MODERN SLAVERY AND HUMAN TRAFFICKING – 2024 –

This statement outlines the measures taken during the fiscal year ended December 31, 2023, to combat all forms of slavery and human trafficking. It applies to the business activities of Orange SA and its subsidiaries, including Globecast UK Limited, Orange Brand Services Limited, Orange Business Services Australia Pty Ltd. ("**Orange Australia**"), Orange Cyberdefense UK Limited and Orange Business Holdings UK Limited (hereinafter referred collectively as "**Orange**"), and their relationships with suppliers.

Presentation of Orange

Orange is one of the world's leading telecommunication operators, with revenue of 44.1 billion euros in 2023 and 137,000 employees worldwide on December 31, 2023, including 73,000 in France. The Group served 298 million customers worldwide on December 31, 2023, including 254 million mobile customers and 25 million fixed broadband customers. The Group is present in 26 countries.

Orange is also a leading provider of global IT and telecommunication services to multinational companies, under the brand Orange Business (formerly Orange Business Services).

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.

Supplier and service provider expenses, which include external purchases and lease payments represent a total expenditure of 20.7 billion euros in 2023. The providers and subcontractors are present worldwide, mainly in Europe, Asia, and Africa.

Orange SA has been listed since 1997 on Euronext Paris (symbol: ORA) and on the New York Stock Exchange (symbol: ORAN).

An integrated business model

Orange, France's incumbent telecoms operator, is a leading digital company both in Europe and worldwide. Guided by its corporate purpose and its new Lead the Future strategic plan, its business model integrates environmental and social challenges to create sustainable value for all its stakeholders.

Rolling out and operating reliable, useful, and resilient networks

For Orange, creating sustainable value means first and foremost making essential digital services accessible to as many people as possible. To achieve this, the Group rolls out and operates fixed and mobile networks for consumers and businesses in Europe and Africa & Middle East. Its networks are among the most extensive in the world. Orange invests in new technologies to ensure that all these networks are increasingly more efficient, secure, and resilient. Lastly, the Group contributes to

European digital sovereignty through its datacentres, and its stake in 450,000 kilometres of submarine cables. Guided by its Net Zero Carbon 2040 target, Orange has been using artificial intelligence to optimize network maintenance and has stepped up the decommissioning of older infrastructure. The Group encourages the decarbonization of its value chain, promoting the circular economy for network and IT equipment, and applies sustainability criteria in the selection of suppliers in its calls for tender. It implements measures integrating energy efficiency, renewable energies, and carbon sequestration. Committed to digital inclusion, it takes action to maximize geographical coverage. Orange is rolling out 5G in a targeted manner and is the leader in the fibre optic roll-out in Europe. Its two European FiberCos support the development of fibre in rural areas, and satellite technology allows its customers in rural areas to benefit from a very high-speed broadband connection. Its Totem subsidiary is now one of Europe's leading TowerCos.

Marketing innovative and secure digital services

For Orange, creating sustainable value also means guaranteeing services and a trusted customer experience in the 26 countries in Europe and Africa & Middle East where the Group is present. To market offers that include accessible and inclusive services, Orange relies on the power of its brand, the network of its distribution channels, and its digital channels. Thanks to its experience as an infrastructure operator and the roll-out of very high-speed broadband, Orange meets the connectivity and innovative mobile service needs of its 298 million consumer, business and operator customers. It allows 34.1 million active Orange Money customers in Africa & Middle East to easily complete financial transactions.

To help businesses boost their economic performance and reduce their own environmental footprint, Orange offers innovative solutions (cloud, trusted cloud, artificial intelligence, data analysis, Internet of Things, Security Operations Centres (SOC), etc.) tailored to developments in their sector. With 2,800 experts and 32 cyber threat detection centres, Orange Cyberdefense has emerged as a leading European provider of cybersecurity services.

Lastly, to contribute to the development of digital services and new ethical and responsible technologies, its experts and researchers work with an ecosystem of partners, companies, start-ups, and public and private laboratories in France and abroad, to build the networks of the future and guarantee its customers – both consumers and businesses – access to the tools and services of tomorrow with complete trust.

Orange is a committed company

This statement forms part of Orange's corporate purpose and new Lead the Future strategic plan. Presented in February 2023, this strategic plan is supported by the implementation of a new business model, based on the objectives of performance, excellence, and trust, with environmental, social and governance challenges at its heart. The Group's commitment is reflected in the Sustainable Development Goals (SDGs) set by the United Nations Member States. Moreover, Orange made the decision to formalize its commitment to society by adopting a corporate purpose, which was incorporated into its Bylaws after approval by the Shareholders' Meeting of May 19, 2020. Co-created with its internal stakeholders (employees, social partners and board members) and external

stakeholders (NGOs, think tanks, customers, elected officials, suppliers, investors, etc.), the corporate purpose was formalized as follows:

“As a trusted partner, Orange gives everyone the keys to a responsible digital world”

It comes with a mission and commitments: “Our mission is to ensure that digital services are well thought-out, made available and used in a more human, inclusive, and sustainable way in all areas of our business. Orange does everything in its power to ensure that people and organizations enjoy a more autonomous and secure digital life. Through the commitment and expertise of the Group’s teams, Orange rolls out innovative technologies and services everywhere, and for everyone.”

Orange’s “Raison d’agir” Committee was launched in November 2021 and composed of eight qualified experts from outside the Group and two members of the Executive Committee. Its role was to make recommendations on the implementation of the corporate purpose and respond to requests for advice and questions formulated by the Group’s governance.

In July 2023, this advisory body, which provided support to general management, recommended that Orange resumes monitoring the corporate purpose in order to answer more complex questions, or even dilemmas, from the Group’s entities.

With that in mind, the Executive Committee decided to launch “Purpose groups” – able to call on different qualified professionals depending on the topics covered – to replace the “Raison d’agir” Committee whose term had expired. The new set-up still serves as a constructive forum to help the Group ensure that its corporate purpose will be an effective lever for a sustainable transformation. In 2023, the “Raison d’agir” Committee met three times.

The strategic guidelines of the Lead The Future strategic plan were presented to the “Raison d’agir Committee” before the plan was finalized. The committee concluded that the Purpose had enriched the plan as well as the new enterprise model.

Governance

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 risk identification, and effectively implementing prevention, mitigation, or repair measures, particularly regarding 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 domains of human rights and fundamental freedoms violations:

- **The Governance and Social and Environmental Responsibility Committee (GSERC)**, is a special committee of the Board of Directors of Orange SA which, in the context of Corporate Social Responsibility (CSR), examines social and environmental information, including this statement. It examines the Vigilance Plan before it is submitted to the Board of Directors for approval;

- **The Group's CSR and Ethics Committee (CSREC)**, which is 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**, that oversees the implementation of the Group's responsible procurement policy for all Group entities and subsidiaries (the "**Responsible Purchasing Committee**"). Three times a year, it brings together representatives from the Group Procurement & Supply Chain (the "**GPS Department**"), the Group CSR Division, the Sustainable Finance, Group Legal, and Group Internal Control departments.

The Responsible Purchasing Committee verifies that:

- Orange's responsible procurement commitments are formalized through the CSR clause which refers to the Supplier Code of Conduct (Group and local suppliers) (the "**Supplier Code of Conduct**")¹ ;
- CSR culture is passed on to buyers through mandatory CSR training courses, and buyers are supported in putting this training into practice through a skill centre;
- CSR risk management based on supplier assessments and audits is effective.

It also promotes the active pursuit of opportunities through dialogue with subsidiaries and suppliers and ensures that there is transparent reporting on the CSR maturity of all subsidiaries.

As such, the objectives of the Responsible Purchasing Committee are to:

- Validate the mandatory CSR commitments to be applied to Orange purchasing, as well as the minimum requirements Orange imposes on its suppliers, particularly in terms of respect for human rights and fundamental freedoms;
- Support the implementation of these commitments through joint actions by the Group CSR Department and the GPS Department;
- Monitor the proper implementation of these commitments by tracking key performance indicators (KPIs) and the effectiveness of the measures put in place;
- Ensure that changes in CSR regulations are properly anticipated and integrated into purchasing processes.

Stakeholder Dialogue

Orange bases its Corporate Social Responsibility (CSR) approach on repeated, structured dialogue with its stakeholders.

This Stakeholder Dialogue engaged in by the Group is based on a structured, systematic methodology implemented throughout Orange's scope since 2008. It is aimed at identifying areas for improvement in Orange's business activities, by comparing the internal perspective with the external perspective of stakeholders.

It involves consultation with pre-identified internal and external stakeholders on the topics addressed in Orange's CSR challenges. The questioning used provides for a semi-quantitative rating system as a way of prioritizing stakeholders' concerns and expectations. Stakeholder Dialogue incorporates an

¹ https://fournisseurs.orange.com/wp-content/uploads/coc_en.pdf.

element of subjectivity, which is inherent to any consultation, into the responses received. It is an open exercise based on both real facts and perceptions.

For the Group's double materiality assessment, the results of the dialogues already used in the 2023 single materiality assessment served as a basis for discussion.

More specifically, 3,750 people have taken part in this Stakeholder Dialogue over the past five years in 16 countries in Europe and in Africa & Middle East, during interviews or working group sessions or through an online questionnaire. The respondents' profiles break down as follows: 47% Orange employees and their representatives; 27% representatives of civil society (non-profits, NGOs, influencers, media, and actors on the ground), 16% representatives of the business community (suppliers, subcontractors, "B2B" customers, etc.) and 10% government representatives (elected officials and representatives from local authorities).

Data from the following dialogues were used for the double materiality assessment: "Precariousness and digital technology" in France, "Responsible together in a post-covid digital world" in 11 Orange countries, and "Let's talk about the duty of vigilance," "Young people and the business world," "Diversity and equality in the workplace" in four countries, as well as a dialogue on responsible innovation conducted by Orange Business.

This approach includes other one-off initiatives, such as the citizen consultation launched in France with the help of Make.org on the topic of reducing the environmental impacts of digital technology. In total, 170,000 citizens submitted more than 6,000 proposals, which received more than 2.6 million votes. The topic of the circular economy (sustainability) was supported by nearly 60% of participants. In the spirit of this citizen consultation, Orange has set up a Sustainable Digital Usage Observatory. The results will be shared with all stakeholders who want to help change the environmental impact of digital technology.

1. POLICIES IMPLEMENTED BY ORANGE TO COMBAT MODERN SLAVERY AND HUMAN TRAFFICKING

Orange aims to pursue a policy of combating human rights and fundamental freedoms violations in an approach based on the following scope and detailed in this section:

- Internally, toward its employees, through its human resources policy based on a structured social dialogue at local, regional and global levels, and in particular the agreement on fundamental social rights;
- toward the people employed by its supply chain, in compliance with its Supplier Code of Conduct;
- toward its customers, by providing the keys to using services with trust;
- toward civil society, mainly through its engagement with the Global Network Initiative (the "GNI", see below) to ensure digital privacy and freedom of expression;
- toward all its stakeholders, through its commitment to promote diversity and inclusion and in its fight against discrimination.

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 2023**, 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 (the “ILO”) also explicitly features in the Group's Code of Ethics². This document sets out the Group's principles of action about 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 on fundamental rights for workers with the **UNI Global Union** (the “**Global Agreement on Fundamental Rights for Workers**”). 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"**³ for 2016, prepared according to the United Nations Guiding Principles on Business and Human Rights (the “**UN Guiding Principles**”), 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 dialogue processes with stakeholders;
- Orange also takes part in the ILO platform on child labour, which reported on its work in June 2021.
- As a signatory to the UN Guiding Principles, Orange contributed to discussions as part of the UN Working Group on Business and Human Rights (UN BHRWG) on the new framework (“UNGP 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.

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 2015 and Australian Modern Slavery Act 2018. This law draws on the UN Guiding Principles and the OECD guidelines for multinational enterprises. 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

² The Group's Code of Ethics is available online at: <https://gallery.orange.com/rse#v=d20662f2-c8b6-43ba-ae0b-54fe33bcbd0c>.

³ The “Orange and Human Rights” report is available online at: <https://gallery.orange.com/rse#om=da20cfac-4efe-4729-b40f-26ff322dc883&v=1316e83f-0435-46fb-820d-e6742ede68e7>.

suppliers with which it maintains an established business relationship, and therefore its supply chain. These measures are outlined in Orange's 2024 Vigilance Plan, which is posted on the Orange website before the Annual Shareholders' Meeting of May 22, 2024⁴.

In addition, Orange has been strongly committed to promoting freedom of expression and respect for privacy in the telecommunication sector as part of the Global Network Initiative (GNI)⁵. (See below "Promotion of human rights and fundamental freedoms").

Lastly, 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.**

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 societal challenges, such as the inclusion of people with disabilities.

On July 17, 2019, Orange signed a global agreement with UNI Global Union on gender equality in the workplace, the fight against discrimination and violence, and work-life balance. The 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 dialogue 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 (operated by a third party), 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 dialogue have also been set up to allow employees to discuss specific topics. Such dialogue has taken place at different levels – national, European, and global – including:

- Employee representative bodies;

⁴ Orange's 2023 Vigilance Plan is available online at: CSR media library (orange.com).

⁵ This is a multi-stakeholder platform that includes Internet operators, NGOs, academics and socially responsible investors that come together to discuss best practices when faced with government demands in the telecommunication sector.

- European Works Council;
- Worldwide Works Council;
- Orange-UNI Global Union Alliance.

Orange's Responsible Procurement Commitments

This Purchasing Policy is clarified through responsible procurement commitments which drive the impacts, risk management and opportunities related to the upstream supply chain for Orange.

For several years now, Orange has been integrating the principles of CSR into its relationships with suppliers and subcontractors and improving the management of social, societal, and environmental risks. Orange's responsible procurement commitments are available at <https://gallery.orange.com/CSR>. They apply to the procurement and supply chain activities of the Group and its subsidiaries, as well as to the purchasing activities delegated to BuyIn, a joint venture established by Orange and Deutsche Telekom, as part of their relations with suppliers and subcontractors. They have the following major objectives:

- Develop balanced relationships with our suppliers, based on trust, respect and long-term business relationships;
- Contribute to financial performance by creating value and ensuring the availability of Group products and services at the best total cost;
- Manage the CSR risks and opportunities associated with procurement and the supply chain;
- Allow the Group and its customers to benefit from the know-how of innovative, high-performance suppliers.

Orange requires its suppliers to meet its CSR standards and to apply them to their own purchasing processes. It does this by making it a contractual requirement that Group suppliers adhere to a Supplier Code of Conduct and comply with laws and regulations, including CSR clauses in Group framework agreements and in exclusively local contracts. Orange's responsible procurement policy specifically requires the various Group entities to control CSR risks and opportunities related to purchasing and the supply chain, in particular by requiring Group suppliers to adhere to a Code of Conduct and to comply with laws and regulations.

The Orange Supplier Code of Conduct describes the ethical, social, and environmental commitments expected by the Group. A new version of the document came into force on March 30, 2023, to adapt to changes in CSR and Compliance regulations and the Group's new strategy. This update clarifies Orange's requirements in terms of human rights and working conditions and incorporates significant developments in the environmental field.

Orange thus requires that its partners, suppliers, and their own subcontractors:

- Comply with all national, European, and international regulations governing ethical and responsible behaviour. This includes, without limitation, standards relating to human rights, occupational health and safety conditions, respect for the environment, sustainable development, anti-corruption and child protection;
- Adopt and apply the Group's ethics standards and commitments and make progress in those areas.

Orange's Supplier Code of Conduct sets out several principles, including:

- **The relationship with national and international law:** the supplier must always comply with applicable laws and regulations, and with contractual obligations as agreed between the parties. This includes the US Foreign Corrupt Practices Act and the UK Bribery Act where applicable. The supplier must also comply with any international economic sanctions (including embargoes and trade and financial restrictions); this includes any sanctions which may be in effect because of a resolution adopted under Chapter VII of the Charter of the United Nations by the UN Security Council, as well as any sanctions that may have been imposed by the European Union. The supplier must ensure that its agents, suppliers, partners, subcontractors and their respective representatives comply with the principles of the Supplier Code of Conduct insofar as they are directly or indirectly involved in the supply of products or services under the contract;
- **The respect for human rights at the international level:** the supplier must not be complicit in a violation of human rights whatsoever and must respect the dignity of people, privacy, and the rights of each individual. Slavery in all its forms is prohibited. Furthermore, the supplier will do its best to comply with all the standards drafted by the International Labour Organization (ILO);
- **Freedom of association and the right to collective bargaining:** the supplier must endeavour to implement internationally recognized standards, for example the conventions of the ILO, without violating national law. It must ensure that its employees and representatives, including temporary workers, can speak openly within their company regarding any issue relating to their working conditions;
- **Prohibition of child labour:** the supplier is prohibited from employing persons under the age of 15 or the age of completion of mandatory education, or under the legal working age in the country, whichever is higher. It must take all measures to enforce this prohibition in its supply chain. If it is found that a child is working on the supplier's premises or that of one of its subcontractors, the supplier must immediately take steps to remedy the situation in order to serve the best interests of the child;
- **Non-discrimination and diversity:** the supplier must treat all employees with respect and must not inflict corporal punishment, use physical or moral coercion, or engage in any form of abuse, harassment, or threats. It must combat all forms of discrimination in relation to ethnic origin, skin colour, gender, sexual orientation, language, disability, religion, political or other opinion, national or social origin, or age. It must ensure compliance with gender equality in the workplace, and promote diversity, equal opportunities and equal treatment in employment and the workplace;
- **Inclusiveness:** the supplier shall facilitate the implementation of inclusive practices, and promote the integration sector, people with disabilities, and collaborations with social and solidarity economy players;
- **Prohibition of slavery and forced labor:** the supplier must comply with the United Nations Universal Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and all applicable regulations prohibiting slavery, including modern slavery, human trafficking, and all forms of forced or compulsory labour within the meaning of the ILO Convention on Forced Labor. In particular, all work must be voluntary, and workers must be free to leave or terminate their employment with reasonable notice. Suppliers must not retain, destroy, conceal, confiscate, or deny access to their employees' identification and immigration documents, such as work permits, unless required by law. In addition, suppliers must work to eliminate the risk of modern slavery in their supply chains;

- **Compensation:** suppliers must provide compensation in line with national regulations on minimum wages. In the absence of national regulations, compensation must be sufficient to cover basic needs such as housing, food, and health, and meet the standards of ILO Convention C131 on minimum wage fixing. The basis on which workers are paid must be clearly communicated to them. Suppliers must not resort to salary deductions as a disciplinary measure;
- **Working hours:** working hours, including overtime, must comply with applicable national laws. In the absence of national legislation, ILO standards must apply. In particular, the normal working week must not exceed 48 hours, excluding overtime which may not exceed 12 hours. Workers must have at least one rest day in every seven-day period. Suppliers must ensure that all workers are entitled to paid leave;
- **Health and safety:** suppliers must provide their workers with a working environment that protects their health and safety, particularly in terms of fire protection and the cleanliness of the premises. They must take the necessary measures to prevent occupational accidents and illnesses. They must regularly hold appropriate training sessions to ensure that workers have sufficient health and safety knowledge. This includes the provision of appropriate personal and collective protective equipment and instructions on their use. When providing housing, suppliers must ensure that such housing is clean and safe, and that it meets the basic needs of workers and, where applicable, their families. Suppliers are encouraged to implement an occupational health and safety management system, based on international standards such as ISO 45001 or equivalent.

Orange's responsible procurement policy is based on the systematic incorporation of a CSR clause in the Group's framework agreements as well as in contracts exclusively applicable locally, which clause refers to Orange's Supplier Code of Conduct in the appendices to these contracts.

The Group measures the implementation of its responsible procurement commitments by, inter alia, monitoring the widespread introduction of the CSR clause in new contracts signed (or renewed) and through the training program for buyers on CSR issues in the supply chain. The Group has set itself a target of 100% of contracts signed including the CSR clause.

Orange Australia has incorporated a clause on Modern Slavery in its standard purchase agreement which requires suppliers to comply with Australian Modern Slavery Act 2018 and when requested, provide information on the measures and controls implemented to ensure compliance. Orange Australia continues with its exercise of incorporating clause on compliance with Modern Slavery Act into agreements with existing suppliers and will continue with this exercise in 2024 also.

Equivalent clauses requiring supplier compliance with the UK Modern Slavery Act as well as wider Orange Group commitments to human rights and the prevention of slavery, are an integral part of Orange Brand Service Limited's standard purchasing terms and conditions, embedding within them the Group's Supplier Code of Conduct.

"Responsible Procurement" label

In 2022, GPS once again obtained the Supplier Relations and Responsible Procurement label for Orange France, which is granted by the French Ministry of Economy and Finance, Business Mediation

and the National Purchasing Council. The label is awarded for three years, subject to successful completion of the annual interim assessments. The first interim assessment was completed in 2023. In 2022, GPS also underwent an ISO 20400 maturity assessment and was awarded the “significant” level (third level out of four). The label is a vehicle for progress and performance, aimed at developing lasting, trust-based, balanced relationships between customers and suppliers.

More specifically, through the 15 criteria under the PDCA (Plan, Do, Check, Act) method, it covers:

- Responsible purchasing commitments and their alignment with Group policy and strategy,
- Responsible sourcing in these processes and practices;
- The vocational training of buyers;
- Supplier relations (compliance with contractual law and balance, mediation, supplier reviews, etc.).

Responsible sourcing encompasses several dimensions, including fairness of the purchasing process, CSR specifications and performance in all aspects of respect for human rights and the environment, the circular economy; and inclusive purchasing. It aims to control financial and compliance risks, as well as CSR issues, including economic dependence and respect for financial equity. This entails:

- Compliance with payment periods in accordance with the provisions of the French commercial code as per the French Economic Modernization Law of 4 August 2008;
- Advance supplier payment (ASP) for SMEs/VSEs – formerly known as collaborative reverse factoring – which consists of a collaborative and responsible short-term financing program set up by the ordering party (buyer) to support its suppliers’ cash flow by paying invoices in advance through a factoring company;
- Reduced payment periods for innovative SMEs and start-ups under experimentation contracts;
- taking the region into account whenever possible;
- the use of mediation to resolve any potential disputes.

Workers in the value chain

The Group’s strategy toward its suppliers aims to protect the Group’s assets and preserve a competitive and sustainable supplier ecosystem over the medium and long term, in support of Orange’s strategy across its entire footprint. Orange has made its own commitments to respect human rights and fundamental freedoms, business ethics and the environment, and to ensure these are also respected by its value chain. To do so, Orange relies on contracts, the assessment of high-risk suppliers and on-site audits, both its own and shared with its peers, to build sustainable market standards.

Orange’s purchasing is carried out via purchase orders, the majority of which refer to contracts, with the remainder in keeping with Orange’s terms and conditions of purchase.

For purchasing contracts, Orange has implemented a system based on both the autonomy given to the purchasing entities of its organizations, which can conclude local contracts on subjects specific to their entity, and on sharing, through Group contracts for matters common to the various entities.

Whether for local or Group contracts, the contract must follow a rigorous selection and negotiation process with the supplier, and include various clauses addressing CSR issues, in particular the

obligation for contracting suppliers and subcontractors to respect human rights and working conditions, and the obligation for them to impose these same obligations on their own suppliers and subcontractors.

Orange's expenditure by major purchasing category was broken down as follows in 2023:

- 37% networks (purchases of works for the network, equipment and maintenance for fixed and mobile networks);
- 21% mobile devices;
- 20% indirect purchases (all purchases for needs specific to the operation of the company and its employees, such as communication and marketing expenses, professional logistics services, energy, etc.);
- 13% IT (purchases of IT services, equipment and maintenance, software);
- 6% Digital Home and platforms (purchases of customer equipment such as boxes, and services);
- 3% telecom (purchase of network capacity and traffic).

2. IDENTIFYING RISKS RELATED TO SLAVERY AND HUMAN TRAFFICKING IN ORANGE'S SUPPLY CHAIN AND ACTIVITIES

Promotion of human rights and fundamental freedoms

In addition to strict compliance with the GNI's guiding principles, Orange is actively involved in promoting human rights within its sphere of influence through various collective initiatives. Accordingly, in 2023, Orange:

- Actively participated in the GNI 2023 Annual Learning Forum and spoke on the impact of future European regulations (AI Act, DSA, CS3D) in terms of human rights obligations, risks and opportunities;
- Undertook an initiative to share good practices between companies on these issues as part of its participation in the French association, EDH (*Entreprises pour les Droits de l'Homme – Businesses for Human Rights*). In 2023, Orange took part in a working group that identified and grouped existing and potential indicators, based on the CSRD's Social ESRS.

Project to strengthen child labour controls

Orange is aware of the impact of child labour on children's physical and mental development. In February 2024, the Group published its policy on child protection and children's rights in the digital age, which includes a commitment to combat child labour below the legal age, in compliance with international (OECD guidelines, UN guidelines and ILO standards) and national legislation in the countries where the Group operates. The prohibition of such labour therefore applies to people under the age of 15 or who have not completed their mandatory schooling, as well as very strenuous and/or dangerous work for children over the age of 15.

Orange asks all players in its supply chain (suppliers, subcontractors, business partners) to also respect this commitment, and mentions it in the Group's Responsible Purchasing policy by specifying it in the Supplier Code of Conduct. The CSR clause included in contracts also serves as a reminder of the compliance obligation.

The CSR supplier assessment program and on-site audits carried out by the Joint Alliance for CSR (the “**JAC**”, see below section: “Audits conducted by the JAC”) makes it possible to verify compliance with this shared commitment and limit the risk of child labour.

However, Orange wishes to strengthen its risk assessment system and identify support needs. In conjunction with the MEA region, the person responsible for roll-out of the Vigilance Plan and the human rights team of the Group Corporate Social Responsibility Division thus developed an initial framework in 2023 aimed at:

- Identifying the regions that are most prone to child labour due to their socio-economic and cultural context;
- Identifying the sectors most at risk, with case analyses and appropriate responses;
- Analysing local legislation in this area;
- Validating the operational control initiative with the MEA region executives and the CEOs of the countries concerned.

The objective is, above all, to make subcontractors aware of the risks involved and to define how they can continue to operate while respecting children’s rights and complying with legislation. However, if there is any doubt as to whether a subcontractor is exploiting children in an abusive manner, more stringent controls, such as audits, may be carried out. For this reason, at the same time, the JAC audit process has been updated to take better account of requests for supplier and subcontractor audits relating to the duty of vigilance.

Following the initial framework, the approach will be tested in two subsidiaries in the region in early 2024. Depending on feedback, roll-out to other countries will be considered.

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

Every year, the Orange group prepares 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 prepared. 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 labour, 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;
- Violation of freedom of expression (in civil society);
- Violation of privacy.

Assessment of risks related to violations of human rights and fundamental freedoms with application of the management systems

| Acteurs//Activités | Réseau | Distribution | Activités support/ R&D |
|-----------------------------|--------|--------------|---------------------------|
| Clients/communautés locales | ● | ● | ● |
| Employés | ● | ● | ● |
| Fournisseurs/sous-traitants | ● | ● | ● |

● Risque très élevé
 ● Risque élevé
 ● Risque modéré
 ● Risque faible

The criticality of the human rights risk is analysed by Orange based on the prevailing legal framework in the geographic areas or countries in which employees are located, with the protection afforded to workers outside the European Union often being less favourable.

The potential use of modern slavery or human trafficking within the framework of a known established contractual relationship is identified as a particular risk for suppliers of electronic and technical equipment due to their location in Asian countries and in the mining industry. As a result, the risk for technical activities (network) and distribution (device manufacturing) is considered high. In addition, for support activities and to a certain extent distribution, Orange has identified providers of surveillance, security, and cleaning services as activities at risk in this respect.

The risk of inadequate working conditions among suppliers and subcontractors is very high in all three areas of activity.

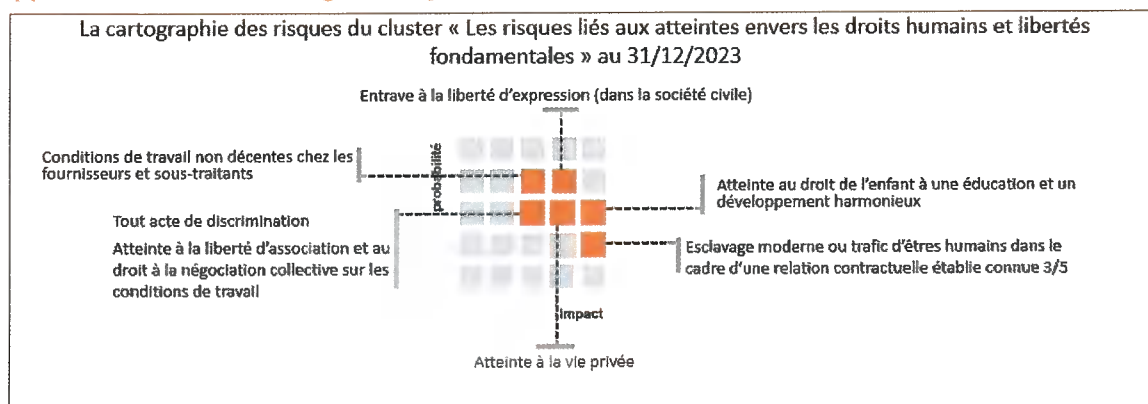
The risk of using child labour below legal working age is also due to the location of suppliers/subcontractors who do not have the same regulatory requirements as the EU. On the other hand, the risk of the inappropriate use of products and services (screen time, violence on the networks, etc.), which can harm children and their harmonious development, is present in all the Group's regions.

The risk of a violation of freedom of association, right to collective bargaining on working conditions and freedom of expression is high among suppliers/subcontractors for the same reasons as those mentioned previously, depending on the location.

Again, suppliers/subcontractors are the stakeholders most exposed to the risk of discrimination due to their location, which can lead to differences in recruitment, salary, diversity, and unfair procedures.

Lastly, Orange's activities expose it to the risk of a breach of privacy, particularly among its customers, as the Group is in possession of key personal information (such as banking data) and may be subject to cyber-attacks.

Assessment of the risk cluster related to violations of human rights and fundamental freedoms after application of the risk management system



Risk management systems implemented by Orange such as specified in this statement are especially the impact study on human rights and remediation, the promotion of human rights and fundamental freedoms, the non-use of minerals from conflict zones, the assessment procedures, JAC Audits, etc.

Table of 2023 internal control and monitoring indicators for potential violations of human rights and fundamental freedoms

For each risk in the “**potential violations of human rights and fundamental freedoms**” cluster, a monitoring indicator has been chosen to measure the progression of the impact of risk mitigation actions over the years:

| Human rights and fundamental freedoms cluster | | | | | |
|--|---|--|-----|-----|---|
| 1. Modern slavery or human trafficking within the framework of a known established contractual relationship | GCSERC, CSR/Procurement Steering Committee | Number of action plans in the 31 areas handled by the JAC ⁽³⁾ | 5 | 17 | |
| 2. Non-decent working conditions at suppliers' and subcontractors' premises: compensation that does not allow an adequate standard of living, right to rest, etc. | GCSERC, CSREC, CSR/Procurement Steering Committee | Number of action plans in the 308 areas handled by the JAC ⁽³⁾ | 118 | 133 | |
| 3. Infringement of a child's right to harmonious education and development: prohibition of child labor, protection against content unsuitable for a young audience | GCSERC, CSREC, CSR/Procurement Steering Committee | Number of action plans in the 21 areas handled by the JAC ⁽³⁾ | 3 | 5 | |
| 4. Infringement of freedom of association and the right to collective bargaining on working conditions | GCSERC, CSREC, CSR/Procurement Steering Committee | Number of action plans in the 21 areas handled by the JAC ⁽³⁾ | 2 | 6 | |
| 5. Any act of discrimination: recruitment, work, salary, diversity, unfair procedures | GCSERC, CSREC, CSR/Procurement Steering Committee | Number of action plans in the 10 areas handled by the JAC ⁽³⁾ | 1 | 1 | |
| 6. Violation of freedom of expression (in civil society) | GCSERC, CSREC, CSR Department | Number of countries that have received one or more service interruption requests | 2 | 1 | 4 |

In Australia, the supply chain consists of suppliers 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.

Orange Australia has created a modern slavery risk profile of its suppliers and evaluated its supplier's compliance with the requirements of the Australian Modern Slavery Act. Copies of the modern slavery statement have been procured from major suppliers to ascertain and confirm 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 behaviour. These standards include human rights, environmental protection, sustainable development, **child protection, and combating modern slavery and human trafficking**.

CSR criteria in Orange's supplier selection

CSR now accounts for 20% of the score given to suppliers in purchasing decisions for projects within BuyIn's scope worth more than 10 million euros. This CSR score is broken down as follows:

- 10%: Supplier Sustainability Scorecard (SSS) assessing the supplier's overall CSR maturity;
- 10%: criteria specific to the product purchased by Orange, depending on the field (networks and IT, fixed customer equipment such as set-top boxes).

The weighting of CSR in the decision criteria for all purchasing projects in France led by GPS was increased in 2023 and now follows the following rules:

- 20% for projects with a high/very high CSR risk and/or a significant carbon impact;
- For purchasing projects with a CSR risk that is not high, the recommendation is to devote 10% of the score awarded to suppliers to CSR, to be decided in consultation with the advising departments.

The Responsible Purchasing Committee oversees the implementation of the policy for all the subsidiaries (see above the "Governance" section).

In 2022, major work was undertaken to develop the following areas in 2023:

- The methodology and tools for assessing suppliers at CSR risk as part of the duty of vigilance,
- the Supplier Code of Conduct;
- the assessment of the environmental performance of suppliers, inter alia to better assess greenhouse gas emissions on the Scope 3 component for Orange.

The Responsible Purchasing Committee which met in January 2022 exclusively addressed the subject of assessing suppliers at CSR risk by assessing the actions undertaken by GPS since the adoption of the law on the duty of vigilance.

CSR risk assessment of Orange's suppliers

A communication from the executive director of Group Corporate Social Responsibility and the director of GPS and was sent out in July 2023 to all Chief Executive Officers, Chief Procurement Officers (CPOs), CSR directors, Duty of Vigilance managers, CSR Purchasing coordinators, and the risk managers of each entity, division and country, to remind them all of the mandatory nature of the methodology and to specify the objectives pursued, which are to:

- Strengthen the third-party sustainability risk assessment process by integrating it into the GPS purchasing process;
- Make this process operational across all entities and divisions, and standardize practices across all entities and divisions;
- Systematize the application of the process.

This communication specified that the sustainability assessment must be carried out before entering a contractual relationship for purchasing projects involving high and very high CSR risk categories (subject to the application of an estimated expenditure threshold). The “List of CSR risk purchasing categories” has been reviewed by the Group’s Duty of Vigilance manager and GPS, considering:

- The non-financial impact on health and safety, human rights and the environment;
- The probability of risk occurrence;
- The specific characteristics of the geographical regions of the Orange entities making the purchase.

This list has been shared with all parties involved in CSR risk assessment. To guarantee the independence and quality of the analysis, supplier assessments were entrusted to EcoVadis, whose methodology is based on international CSR standards and guidelines such as the Global Compact, ISO 26000, ILO and GRI. As an exception, the CSR risk analysis is based on an internal Orange’s assessment.

The first support stage consisted of training sessions, in French and English, held by GPS Department for CPOs and CSR purchasing liaison officers in all regions. Specific sessions were also held at the request of certain countries in the MEA region. Several tools have been made available to entities, divisions, and countries: presentation of the assessment tool and the available features, frequently asked questions (FAQ), content and videos on the document database shared within the purchasing community.

In 2023, Orange Australia has concluded the exercise of review and assessment of its supply chain in Australia for modern slavery risks and at present does not consider that there is a modern slavery risk that requires a separate assessment.

The supplier database will be reviewed on a regular basis to ensure the information remains correct and up to date. In 2024, Orange Australia will be working on updating its onboarding process for

suppliers who have a higher risk of modern slavery so that compliance with Modern Slavery Act is a criterion to be met while onboarding such suppliers in Australia.

Orange Brand Services Limited has developed its own onboarding process and maintains a database of suppliers containing their details, country, and Purchase Order Data (including what commodity or service is being purchased). Orange Brand Services Limited is responsible for its own due diligence and risk assessment of its circa 210 suppliers and, to date, its fraud and compliance (anti-corruption and sanctions) due diligence does not consider there to be a modern slavery risk that requires separate or more detailed assessment of suppliers in the context of modern slavery. However, its onboarding process can be developed to incorporate such due diligence should future risk assessments identify a need for it (the supplier database could be used as the basis for establishing the level of risk relating to modern slavery (i.e., country risk by commodity/service risk)).

The GNI and the transparency report on freedom of expression

The implementation of Orange's commitment to the promotion of freedom of expression and respect for privacy in the performance of its activities as a telecommunication operator is guided by its participation in the Global Network Initiative (GNI). In March 2017, along with several operators and equipment suppliers from the Telecom Industry Dialogue (TID) group, Orange joined the GNI⁶, of which it is now a member of the board of directors.

The GNI is a platform that promotes respect for freedom of expression and privacy rights when faced with government demands to hand over user data, remove content or restrict communications, all against the backdrop of an ever-changing geopolitical, technological, political, and regulatory landscape. At end-December 2023, it was made up of 17 major global digital technology companies, 25 universities, 38 non-governmental organizations (NGOs) and 10 investors.

The GNI guiding principles⁷ are a reference framework within Orange for the development and implementation of policies and processes related to freedom of expression and privacy in its activities as a telecommunication operator. These principles are based on universally recognized human rights laws and standards, including the Universal Declaration of Human Rights (UDHR), the International Covenant on Civil and Political Rights (ICCPR) and the International Covenant on Economic, Social and Cultural Rights (ICESCR).

Accordingly, Orange strives to:

- Respect and work to protect users' freedom of expression by seeking to avoid or minimize the impact of government restrictions on freedom of expression;
- Respect and work to protect the privacy rights of users subject to government requirements, laws and regulations that may compromise privacy in a manner inconsistent with internationally recognized laws and standards;
- Identify circumstances where freedom of expression and privacy may be either compromised or promoted and, in such circumstances, integrate these guiding Principles into decision-making;
- Give precedence to employee safety over the previous principles.

⁶ <https://globalnetworkinitiative.org>.

⁷ <https://globalnetworkinitiative.org/wp-content/uploads/2018/04/GNI-Principles-on-Freedom-of-Expression-and-Privacy.pdf>.

To apply these principles, Orange conducts an annual risk assessment since 2012 in all the countries where it is an operator, and has rolled out a system applicable to each event resulting from a government request in order to ensure that the request is justified under local law (that it comes from a government department with the authority to make such request), in compliance with international laws. In addition, Orange expresses a judgment on the proportionality of the request.

Human rights impact assessments and remediation

Orange uses the country analyses of Verisk Maplecroft⁸, a specialist external firm using a methodology based on United Nations and OECD standards, to perform a customized assessment of the risk 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 because 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. These dimensions were redefined in 2022 to ensure balanced coverage of the three areas, namely:

- Degree of democracy, including government stability and the degree of democratic governance, independent judiciary, and rights of minorities (35.7%);
- Basic rights of workers, including the absence of forced labour and child labour, anti-discrimination, freedom of association and the right to collective bargaining, and protection of women (35.7%);
- The business climate for Orange, including business ethics, freedom of opinion and expression, right to privacy, digital access (28.6%).

The 2023 human rights impact assessment carried out for the Orange operator entire scope, using scores assigned by specialist firm Verisk Maplecroft to the three areas of democracy, workers' rights, and business climate, showed that some areas in which Orange is present require sustained attention in terms of respect for human rights and fundamental freedoms. These countries are the Democratic Republic of the Congo and the Central African Republic. In total, 412 people are directly employed by Orange in these two countries, serving 14 million customers. The firm also determined that 13 other countries in the Africa & Middle East region require special attention in terms of human rights and fundamental freedoms.

In total, 19,635 people are directly employed by Orange in these countries⁹, serving more than 138 million customers.

To fully exercise its power to oppose any unjustified request to interrupt service or requisition data, Orange also verifies the latest legal provisions allowing the authorities to request service interruption, service reductions or communication interceptions, particularly before elections are held. In fact, requests for service interruption from governments are increasingly concurrent with the electoral process (in the run-up to an election and during the election itself, including the counting period).

⁸ <https://www.maplecroft.com/>.

⁹ Only entities consolidated by Orange have been taken into account in the calculation of the number of employees and customers.

To prevent this risk, Orange activates pre-crisis units, jointly coordinated by the MEA region Security and Business Continuity Departments, which are operational from the pre-election periods until the results are announced. With the involvement of the subsidiaries concerned and the support of the Group Security Department, they verify the implementation of procedures enabling employees to continue their essential activities in complete safety. Despite striving for constant dialogue with the authorities, Orange is indeed sometimes prompted, in liaison with the GNI and non-governmental organizations, to challenge opinions on discriminatory behaviour or behaviour that undermines respect for human rights and fundamental freedoms. Orange may receive several different and simultaneous requests from the authorities: to reduce Internet speeds, limit access to certain social networks and interrupt various categories of telecommunication services.

Non-use of minerals from conflict areas

Orange recognizes the legitimacy of concerns about sourcing materials from regions plagued by political and social conflict and is striving to use a socially responsible supply chain. However, the supply chain for these minerals is long and complex and involves many stakeholders. Orange does not purchase minerals directly and requires its main suppliers to perform due diligence to avoid using minerals that may directly or indirectly finance armed groups. As such, Orange contractually requires its suppliers to ensure that they themselves do not use minerals from these areas through three different levers, namely: the Supplier Code of Conduct, which is appended to all purchasing contracts, the equipment-specific CSR annex, which is of a more restrictive nature and is appended to all equipment purchasing contracts, and lastly the CSR clause appearing in purchasing contracts, which involves suppliers signing “Orange’s Responsible Purchasing Commitments”.

In addition, Orange’s main electrical and electronic equipment suppliers adhere to the RBA (Responsible Business Alliance¹⁰) code of conduct, which includes a commitment to policy and due diligence on the sourcing and traceability of tantalum, tin, tungsten and gold in the products they manufacture in order to ensure they are committed to sourcing in a manner consistent with the Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, or an equivalent and recognized due diligence framework.

Of Orange’s top 150 suppliers, which represented 70% of Group purchases in 2023, there were 25 electrical and electronic equipment manufacturers potentially affected by the presence of materials that might have originated from conflict areas. Of these 25 suppliers, 19 are signatories to the RBA. These 19 suppliers accounted for 96% of the Group’s electrical and electronic equipment expenditure in 2023.

Supplier assessments by EcoVadis consider the issue of non-use of minerals from conflict areas. 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 this point triggers corrective actions and their follow-up.

¹⁰ Formerly known under the name Electronic Industry Citizenship Coalition (EICC).

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. As of the end of 2023, it regroups 27 telecommunication operators around the world, compared to 18 at the end of 2021. The significant change in the number of JAC members is due primarily to the effectiveness of the audit results pooling program implemented since 2010 for more than 600 high-CSR-risk production sites in 45 countries and at different levels of the supply chain (tiers 1, 2 and 3). These results are taken into account in the selection of suppliers within the various Orange group entities, including BuyIn.

Thanks to the JAC, members are not alone in managing the new sustainability challenges affecting the entire supply chain, such as climate change, the implementation of circular economy principles, and the fight against new forms of human rights violations and labour exploitation. In this respect, the JAC has established dedicated working groups to adopt common positions and a shared methodological approach aiming to anticipate, monitor and measure the implementation of these principles to meet the new due diligence regulations.

The operators members of the JAC 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 of audit through telephone with the support of an NGO. This untested method was used alongside traditional audit methods to gather employee, supplier and subcontractor testimonials anonymously and transparently under various categories, including wages, discrimination, child labour, etc.

In 2023, the JAC conducted 150 audits, including 123 on-site audits carried out directly by the JAC, and 14 VAP (Validated Assessment Program) audits conducted by the RBA. The JAC also carried out 13 anonymous surveys of 10,342 workers over the phone, specifically about their working conditions.

These actions made it possible to reach the level of tier-two and tier-three suppliers (57% of audits and investigations). The JAC's actions in 2023 lead to creating 890 corrective action plans, 45% of which related to occupational health and safety conditions, 18% to excessive working hours and 11% to non-compliance with environmental standards. 18% of the sites audited achieved a JAC CSR score of "Excellent." 46% obtained a "Good" JAC score but with room for improvement, 11% a "Conditionally Acceptable" JAC score, and 24% a "Poor" JAC score.

For example, for these incidents of non-compliance regarding forced labour, 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 work permits, and more.

The JAC has approached institutions including the International Telecommunication Union (ITU), Business for Social Responsibility (BSR), Carbon Disclosure Project (CDP), 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.

Finally, as part of the JAC, a Human Rights Working Group was created in February 2021. Initial work focused on forced labour, with questioning of suppliers by the operators, based on the report of the Australia Strategic Policy Institute (ASPI) which described the forced labour allegations and concerns regarding new forms of forced labour in Asia. Of the 35 suppliers questioned by the 8 members of the JAC (including Orange), 29 provided proof of due diligence. The JAC continues its work on the follow-up of corrective action plans and for suppliers who are yet to respond.

In 2023, work groups were focused on four themes: forced labour, child labour, decent wages, and conflict minerals.

4. GROUP WHISTLEBLOWING SYSTEM

In accordance with the French “Sapin 2”, “duty of vigilance”, and “Waserman” laws (the latter transposing into French law the European directive on protection of whistleblowers), Orange has established a Group whistleblowing system open to all Group employees, as well as to partners, suppliers, and external stakeholders. This system allows them to report conduct or situations that go against the Group’s anti-corruption policy, Code of Ethics, or policies and procedures relating to accounting, internal control, and auditing, that are in clear and serious violation of laws or regulations, or that seriously infringe human rights and fundamental freedoms, the health and safety of individuals or the environment.

Since June 2021, the external report-collection platform has replaced the historical email address of the Group whistleblowing system. This secure web platform is accessible from orange.com, the Group’s Intranets and search engines.

The Group’s whistleblowing system is supplemented by local subsidiary systems. Since its launch, this platform has been adopted by several Group entities to replace their local email systems: such is the case for Orange Business, Orange France, Orange Bank, Orange Guinea, Orange Burkina-Faso,

Sofrecom, Orange Slovensko and Orange Communications Luxembourg. This will also be the case for Soft at Home, Viaccess-Orca and TOTEM in 2024.

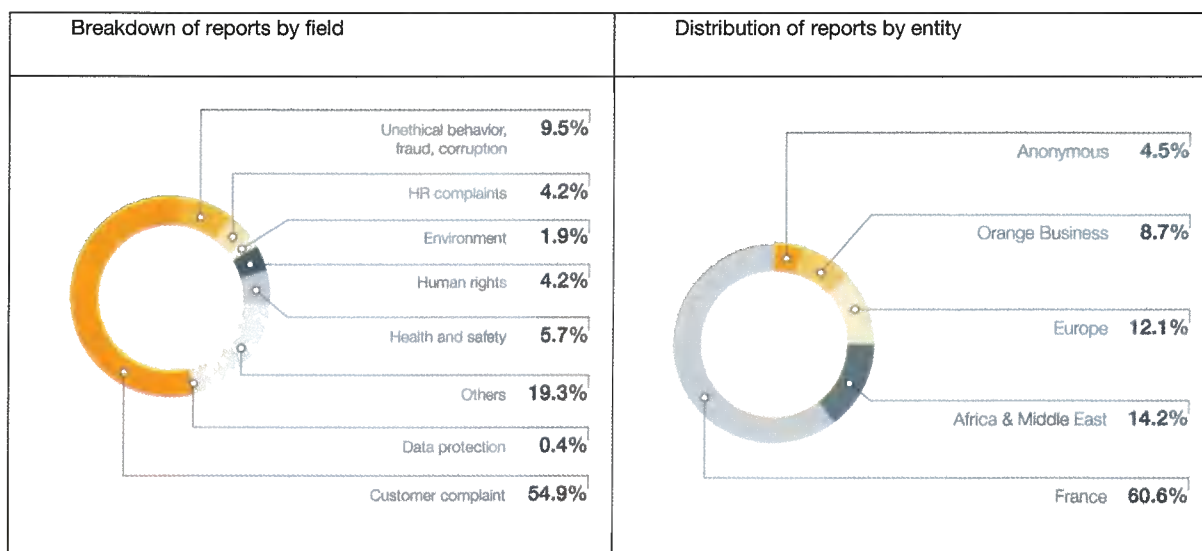
Employees are regularly provided information on Group and local whistleblowing systems through training courses and communication campaigns (emails, Intranet, site posters, etc.).

Reports are processed according to Group and subsidiary procedures: acknowledgment of receipt, review of the admissibility of the report and processing by authorized teams while respecting the confidentiality of the whistleblower’s identity and the people concerned throughout the process.

The whistleblowing procedure provides protection for individuals who meet the legal definition of whistleblowers, in accordance with legal and regulatory provisions: Orange undertakes to ensure that no employee will be punished, dismissed, or subjected to any discriminatory measure, whether direct or indirect, for having, in a disinterested manner and in good faith, reported facts of which they have personal knowledge. Orange also undertakes to ensure that the procedures implemented to collect reports guarantee that the identity of the author of the report and the information collected through the whistleblowing system remain strictly confidential.

Orange has a specialized team which, at the request of management and/or compliance, carries out internal investigations in the event of a justified report or suspicion of fraud or corruption.

2023 saw an increase of almost 45% in the number of reports received on the Hello Ethics platform (264 in 2023) and of more than 50% in the number of questions received (82 in 2023).



In addition to the Hello Ethics platform, each country or Group entity may also have its own reporting system complying with local regulations; this is the case for almost all the Group’s subsidiaries.

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, which is in the company's case, an independent whistleblowing charity organisation called Protect¹¹.

5. OUTREACH, TRAINING AND SHARING OF BEST PRACTICES

The achievement of the Group's CSR objectives and commitments requires an in-depth transformation of the enterprise, calling for the contribution of all employees. Orange has therefore implemented awareness-raising and training programs to develop a general CSR culture and to have essential CSR skills at its disposal.

These programs are structured by a Strategic committee and an Operational committee that were set up to include representatives from different Orange entities to identify skill needs and to prioritize and structure the development of CSR training offers. These CSR training offers are organized around three objectives:

- Raise awareness among all employees of the challenges of a responsible and inclusive approach;
- Incorporate CSR skills into the business approaches to empower all employees to take action in their activity;
- Ensure the upskilling of experts in the environmental field.

Access to CSR training is provided by a dedicated portal, accessible to all employees and structured around three pillars: Environment (carbon footprint and circular economy), Society (digital inclusion and responsible use) and Corporate policy (diversity and inclusion, ethics and compliance, duty of vigilance, human rights).

In 2023, 59,812 employees participated in 131,129 hours of CSR learning activities.

General CSR awareness training

To enable all Orange employees to take on the challenges of CSR and the commitments made by Orange in this area, an online training course, available in seven languages, was launched in October 2020. A "certificate" is awarded after passing a knowledge test. From the launch date through December 2023, 62,922 CSR certificates have been awarded.

In addition to the CSR certificate, this process of acculturation has been enriched by several thematic training courses.

One example is the "Equality in the Workplace" certificate, which helps recipients identify and understand the challenges of gender equality in the workplace. Another is the "Climate Fresk"¹² workshop, which is an opportunity to learn about the causes and consequences of climate change and Orange's commitments in this area, and to discuss the actions to be taken within the Group to reduce CO2 emissions. From the launch date through December 2023, 20,541 people in the Group participated in this training course taught by more than 200 Orange employee facilitators; it is offered in person and virtually in French and English.

¹¹ <https://protect-advice.org.uk/>.

¹² <https://climatefresk.org/world/>.

Orange employees can also learn more about the issues around the duty of vigilance, digital accessibility, the circular economy, biodiversity, ethics, and compliance, etc.

Human Rights training

Backed by its membership in the “Entreprises pour les droits de l’Homme” (Businesses for Human Rights – EDH) association, an organization grouping together some of the largest French companies, Orange has been rolling out an e-learning training called “human rights in companies,” to disseminate its main principles among its employees. E-learning, which is available in English, French and Polish, enables employees to identify the human rights issues at stake in their day-to-day activities, as well as the most high-risk areas and activities, and to learn how to respond.

At December 31, 2023, 726 learners had completed this course, with 90% of them in the MEA region.

Further training specific to the businesses

The CSR “business” training portfolio targets all technical, marketing and finance functions, among others, and helps incorporate CSR skills into the business approaches to empower all employees to act in their activity.

It includes, for example, training on eco-design for products and services; training on circular design to optimize interfaces and the user experience; training on responsible purchasing and responsible marketing training to make sustainable development a real lever for the Group’s business value added. Training for the finance functions, which play a key role in reporting and managing non-financial trajectories, was launched in the first quarter of 2023.

Leadership training is also a key focus, with a special training course designed for members of Orange’s Board of Directors.

Two e-learning modules on the duty of vigilance are available to all Group subsidiaries and divisions:

- A 1.5-hour training module for practitioners of the Vigilance Plan (network of liaison officers, risk managers, compliance officers). This module is mandatory. The objective is to provide technical knowledge to Orange’s subsidiaries and divisions to make implementation of the Vigilance Plan easier;
- As of December 31, 2023, 75 people had completed the training module, covering 100% of the practitioners of the Vigilance Plan. The Orange Cote d’Ivoire and Democratic Republic of the Congo teams had the highest level of participation: 26 people were trained in the operational practices of the vigilance plan.
- A 30-minute awareness-raising module presents the essentials for understanding the duty of vigilance regulations, the Vigilance Plan, and the challenges ahead. The module concludes with a final quiz to confirm understanding. Its primary objective is to help participants understand the regulations, but also gain awareness about issues related to the duty of vigilance, learn how to respond and, ultimately, develop a culture of vigilance. It is aimed at all employees, although priority is given to the operational players most exposed to areas concerned by the duty of vigilance (purchasing, HR, CSR players, etc.).

Thanks to the mobilization and commitment of the duty of vigilance liaison officers in the subsidiaries and divisions, the percentage of completion increased significantly in 2023 compared to 2022. In 2023, 1,580 employees participated in the module, or an increase of 680% compared to 2022. Teams from Orange Romania and the Orange Innovation division performed particularly well, with the awareness module being widely followed.

Grace à la mobilisation et l'engagement des correspondants devoir de vigilance dans les filiales et divisions, le pourcentage de suivi a augmenté significativement en 2023 par rapport à 2022. En 2023, 1 580 collaborateurs ont suivi le module, soit une augmentation de 680 % par rapport à 2022. Les équipes d'Orange Roumanie et de la division Orange Innovation ont particulièrement performé avec une diffusion large du module de sensibilisation.

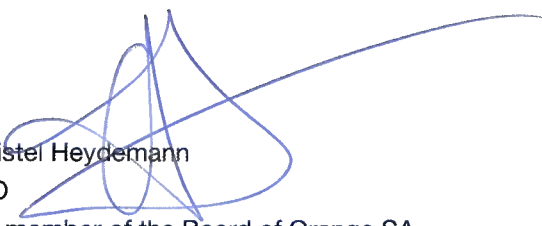
* * * * *

* *

To prepare this joint statement, Orange SA engaged and consulted with its subsidiaries, including Globecast UK Limited, Orange Brand Services Limited, Orange Business Services Australia Pty Ltd., Orange Cyberdefense UK Limited and Orange Business Holdings UK Limited, that are covered by this statement, and discussed the requirements of the Modern Slavery Act and the steps that need to be taken to mitigate modern slavery risks.

This statement is published in accordance with Section 54 (1) of the UK Modern Slavery Act 2015 and Section 13 of the Australian Modern Slavery Act 2018. It was approved by the Orange SA Board of Directors' Meeting of February 14, 2024.

It is drafted in French and English.



Christel Heydemann
CEO
and member of the Board of Orange SA