

## ORANGE DECLARATION ON MODERN SLAVERY AND HUMAN TRAFFICKING - 2021 -

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This statement describes the measures taken during the financial year ended December 31, 2020, to combat all forms of slavery and human trafficking. It concerns the activities of Orange SA and its subsidiaries, in particular Globecast UK Limited, Orange Brand Services Limited, Orange Business Services Australia Pty 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, a French limited company, and subsidiaries and shareholdings in France and in 26 countries, mainly in Europe, Africa and the Middle East. Orange is one of the main telecommunication operators in the world, with revenue of 43.3 billion euros in 2020 and 142,150 employees at December 31, 2020, of which 87,242 in France. Orange served 259 million customers worldwide at December 31, 2020, including 214.1 million mobile customers and 21.7 million broadband customers.

Orange is also one of the world leaders in telecommunication services for multinational companies under the Orange Business Services brand. The company has around 75,000 suppliers and subcontractors worldwide, mainly 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 plan forms part of Orange's new strategic plan, Engage 2025, and the purpose that it outlined 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 Orange Group's projects worldwide. The Group's commitment is embodied 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 the Shareholders' Meeting of Orange on May 17, 2020 and included in Orange's Bylaws.

In addition, in 2019 Orange strengthened the governance related to the guidelines and implementation of Orange's Corporate Social Responsibility (CSR) as well as that relating to the validation of the information published by the

Group on societal matters. This change in governance, which was implemented in 2020, has made it possible to better define the different levels of the company that contribute to the development, validation and control of risk identification and the effective implementation of preventive, mitigating or remedial measures, particularly in the event of human rights violations. Implementation of the Modern Slavery Act (i.e. UK Modern Slavery Act 2015 and Australian Modern Slavery Act 2018 (Commonwealth)) is part of this governance.

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

### Orange's commitments

The fight against slavery and human trafficking is part of Orange's policy to respect and promote human rights. This policy is illustrated by various commitments:

- Orange was one of the first companies to sign the **United Nations Global Compact in 2000 and renewed its signature to the United Nations Global Compact in 2020**, thus affirming its commitment to respect and promote fundamental human rights in its activities and in its sphere of influence;
- Respect for the fundamental principles set out in the Universal Declaration of Human Rights and the International Labor Organization 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 to 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 Alliance**. Through this agreement, Orange reaffirms its commitment to respect fundamental human rights, both internally and in its relations with its suppliers and subcontractors;
- Orange also published a **report on "Orange and human rights"**<sup>2</sup> for 2016, drawn up in accordance with the United Nations Guiding Principles on Business and Human Rights, in order to meet the expectations of stakeholders. Faced with human rights issues, this document lists the Group's approach, awareness-raising tools and internal procedures ensuring both the implementation of commitments in all entities and the dialogue with stakeholders;
- As a signatory to the United Nations Guiding Principles, Orange contributed to discussions on the new framework to be put in place after ten years of applying the Guiding Principles, as part of a working group led by the United Nations. 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

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

[https://www.orange.com/fr/content/download/3210/28240/version/4/file/CHARTRE-DE-DEONTOLOGIE\\_03-10\\_VF.pdf](https://www.orange.com/fr/content/download/3210/28240/version/4/file/CHARTRE-DE-DEONTOLOGIE_03-10_VF.pdf)

<sup>2</sup> The Orange human rights report is available online:

<https://www.orange.com/fr/content/download/45336/1348004/version/9/file/Rapport%202016%20Orange%20Droits%20Humains%20DIGITAL-VF.pdf>

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 English Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018. This law is based on the United Nations and OECD guidelines for multinational companies. It requires the implementation of reasonable vigilance measures to identify risks and prevent and mitigate serious violations of human health and safety, the environment and human rights and fundamental freedoms (including the fight against modern slavery). On the one hand, its scope extends to risks and damage that might result from the activities of the Group, its subsidiaries or the companies it controls. On the other hand, it also extends to the activities of its subcontractors or suppliers, with whom there is an established commercial relationship, and therefore to its supply chain. These measures are described in the **Orange Vigilance Plan 2021** which will be posted on the Orange website before the Orange Annual Shareholders' Meeting to be held on May 18, 2021<sup>3</sup>.

In addition, Orange is strongly involved in promoting freedom of expression and respect for privacy in the telecommunication sector within the **Global Network Initiative** (GNI)<sup>4</sup>.

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

As a member of EDH (*Entreprises pour les Droits de l'Homme*), Orange continued its dialogue with NGOs and social partners during 2020 on the themes of respect for human rights, particularly forced labor.

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

- in a webinar organized by the French Court of Auditors in July 2020 on business resilience: Orange presented its actions relating to the protection of human rights and freedom of expression during the period of lockdown. Orange highlighted the protection of its employees thanks to the massive use of telework, its responsibility towards its suppliers, in particular towards the most fragile companies for which measures for immediate payment of bills were applied; with respect to its customers, Orange implemented its business continuity plan, while reinforcing the capacity of its networks and its cyberdefense offer:

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<sup>3</sup>The Orange 2020 vigilance plan is available online: <https://gallery.orange.com/#o=custom&v=9396b6eb-b3bd-4fdb-8be7-ca877ed041a8>

<sup>4</sup> It is a multi-stakeholder platform including Internet operators, NGOs, academics and socially responsible investors who come together to discuss best practices in response to government demands in the telecommunication sector.

- at a symposium organized in October 2020 by the “Human Rights Platform” on partnerships between the private sector and NGOs, Orange shared its vision of concerted actions within structured platforms such as the GNI, the JAC or the EDH on specific themes;

- Orange took part in a webinar organized by CSR Europe with the participation of the European Commission in November 2020, to present the JAC (Joint Alliance for CSR) initiative, which makes cooperation central to interactions between prime contractors and their supply chain; this webinar was part of the European Commission’s consultation process to establish a new regulatory framework for human rights due diligence.

Finally, the fight against modern slavery and human trafficking is part of its commitments and actions to promote and respect human rights, in its activities and its supply chain.

### Orange’s internal policies

In terms of human rights, Orange’s actions thus focus on specific areas and players, namely:

- **respect for the fundamental rights of employees and staff;**
- **promoting respect for human rights with suppliers and subcontractors.**

### Social domain

In addition to the Global Agreement on Fundamental Social Rights mentioned above, dedicated policies have reinforced commitments in terms of occupational health and safety, diversity and equal opportunities.

Orange has formalized its Group Diversity policy since December 2012. It defines professional gender equality as a common theme for all Orange entities worldwide and specifies that each country is responsible for choosing at least one other dimension of diversity corresponding to its economic and societal challenges, for example the integration of disabled people.

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 rolled out and adapted in the countries where Orange is present, is based on a participatory approach by all stakeholders and is built through structured social dialogue and monitoring by the Group, based in particular on dedicated local committees.

In France, several mechanisms are in place to fight against discrimination: a dedicated monitoring committee with trade unions, making the Allodiscrim service (external to Orange) available for employees and candidates for external recruitment to report and deal with any situation in which there is discrimination, raising employee awareness of stereotypes via the “professional equality visa”.

**Representative social dialogue bodies** were also set up to enable employees to discuss specific topics. These dialogues take place at different levels: national, European and global, as follows:

- 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> that embeds CSR in its supplier relationships and improves management of risks, including human rights risks. This policy is based on two axes:

- acting as a responsible order giver: by implementing CSR principles in the governance and internal processes of purchasing and logistics, while contributing to regional development and local employment;
- engaging suppliers and subcontractors so they undertake to meet CSR standards and integrate these standards themselves in their own purchasing channels.

Lastly, Orange has the following tools, which enable it to assess and audit its suppliers on their CSR policy and in particular on respect for human rights, which includes the prohibition of modern slavery and human trafficking.

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

### Human rights impact assessment and remediation

Orange determines the criteria corresponding to its assessment of the human rights risks incurred as a result of its activities and geographies. As such, 13 dimensions of human rights are considered in the form of risk criticality indexes to provide an aggregate rating, country by country. They cover the robustness of the various 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 and women.

They are supplemented by more specific dimensions 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; the dimensions of government stability and civil unrest were also included in 2020 for the first time.

As an employer and ordering company in its supply chain, the criterion of discrimination against employees is added.

On the basis of its 2020 human rights impact assessment, based on the ratings assigned by Verisk Maplecroft in the analytical framework described above for the entire Orange operator scope, Orange considers that three of the geographies in which it operates required sustained attention with regard to respect for human rights and

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<sup>5</sup>The responsible purchasing policy is available online:  
<https://www.orange.com/fr/content/download/31869/949513/version/2/file/Politique%20Achats%20responsables%20VF.pdf>.

fundamental freedoms as of the end of 2020. They are Mali, the Democratic Republic of Congo and the Central African Republic. A total of 1,260 people are directly employed by Orange<sup>[1]</sup> in these three countries to serve more than 23.5 million customers. Five countries are assessed by Orange as also requiring special attention in terms of human rights and fundamental freedoms. They are Guinea, Cameroon, Egypt, Burkina Faso and Madagascar. A total of 24,482 people<sup>[2]</sup> are directly employed by Orange in these countries to serve more than 55.5 million customers.

The Group identifies election periods as requiring special attention to prevent risks specific to its business as a critical infrastructure operator. Pre-crisis units are activated and are jointly coordinated by the MEA zone Security and Business Continuity Departments prior to election periods, and remain active 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 our employees to continue their essential activities in complete safety.

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

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

Each year, a risk mapping for the Orange Group is drawn up based on the Group's **risk management method**, which includes risks relating to the duty of vigilance in the areas covered by the law, namely: human rights and fundamental freedoms, health, safety and security of persons and the environment.

Thus, four dedicated clusters (risk groups) have been established. They are updated each year and included in the Company's overall risk mapping. For each of these clusters we define the various risks, their consequences (impact) and causes (probability) should they arise, and the main hedging mechanisms and action plans.

Among these new clusters, there is one that deals with potential violations of human rights and fundamental freedoms and which identifies 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': remuneration that does not allow an adequate standard of living, right to rest, etc.;
- Infringement of a child's right to harmonious education and development: prohibition of child labor, protection against content unsuitable for a young audience;
- Infringement of the freedom of association and right to collective bargaining on working conditions;

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<sup>[1]</sup> Employees on permanent and fixed-term contracts as of June 30, 2020

<sup>[2]</sup> Employees on permanent and fixed-term contracts as of June 30, 2020

- Any act of discrimination: recruitment, work, salary, diversity, unfair procedures;
- Breach of freedom of expression (in civil society);
- Violation of privacy.

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.

Orange Australia has initiated an exercise for creating a modern slavery risk profile of its suppliers and evaluating its supplier's compliance with the requirements of the Australian Modern Slavery Act.

As a first step, Orange Australia has reached out to some of 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. Measures taken to mitigate or prevent human rights risks

#### Actions vis-à-vis suppliers

Orange requires that its partners, suppliers and their sub-contractors respect 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 the fight against modern slavery and human trafficking**.

Orange promotes these standards to all its suppliers during its purchasing and **selects through a structured 7-step process**. This process includes an assessment of suppliers at the time of their listing, as well as throughout the life of the contract, and using several tools.

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 towards the most vulnerable suppliers from a CSR standpoint.

In addition, in Australia a questionnaire seeking information from the Supplier's on compliance in context to Australian Modern Slavery Act is also being prepared, it will be operational in 2021 and also be used for assessment of the suppliers.

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

In 2019, Orange defined a new supplier assessment program oriented towards 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 mitigate risks better and support those who must strengthen their efforts on the path of sustainability.

This new initiative involves the assessment of local suppliers belonging to the high-risk category, with 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 UNGC, ISO 26000, ILO or GRI.

In 2020, this initiative was extended to five new entities: Orange Poland, Orange Romania, Orange Belgium, Sonatel in Senegal and OBS, which are added to the entities involved since 2019, notably Orange France, Orange Spain, Orange Slovakia, Orange Moldova, Orange Jordan, Orange Cameroon and Orange Madagascar. To ensure the rollout, training has been stepped up 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 2020, 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 2020. 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 2020. 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 2021, Orange Australia will review and conduct an assessment of its supply chain in Australia for modern slavery risks. Orange Australia will further seek information from suppliers through a questionnaire in order to ascertain the applicability and compliance with Modern Slavery Act.

The BuyIn joint venture, created by Orange and Deutsche Telekom in 2011 to combine the strategic purchasing of the two international groups from the Group's main suppliers (network equipment, IT software and hardware, customer devices and service platforms), also performs maturity assessments of its main suppliers using the method described 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 subsequently promotes its CSR standards through a **contractual commitment by suppliers in the form of a Supplier Code of Conduct**. This was overhauled in 2017 and has been appended to all new contracts since 2018, making it mandatory. This Code of Conduct specifies the employee-related and social commitments required by the Group in terms of fundamental human rights: compliance with the fundamental conventions of the ILO on human trafficking, child labor, freedom of association, the fight against discrimination, and working conditions (working hours, compensation, disciplinary practices).



Furthermore, in 2018, the CSR clause was revised and since then, available in both English and French, it has been included in all Group purchasing framework contracts as well as in purchasing contracts exclusively for local use. A training course has been developed for this purpose.

In addition, work is underway to propose a CSR clause that is slightly different from that included in purchasing contracts, for inclusion in all other Orange contracts (partnership contracts, distributors, operators, customers, etc.).

Whether it is the CSR clause inserted in purchasing contracts, or the one that will be inserted in other contracts, it is expressly stated that each Party undertakes in particular, and asks its co-contractors, subcontractors and any other legal person under its control to also undertake, to (i) refrain from using modern slavery, child labor or human trafficking, and (ii) combat all forms of discrimination.

In 2021 Orange Australia will be incorporating a clause in its standard supply agreements requiring suppliers' compliance with Australian Modern Slavery Act. Upon request by Orange, suppliers will be required to provide information of the measures and controls taken to ensure compliance. Further, a breach by the supplier constitutes a material breach of the Agreement.

#### **Audits carried out by the JAC**

Orange's commitment to the fight against modern slavery is also embodied in the promotion of these principles within its sphere of influence, with its suppliers and subcontractors, thanks to the **JAC's** actions.

The **JAC** (Joint Alliance for CSR) is an organization created in January 2010 at the initiative of Orange, Deutsche Telekom and Telecom Italia, and which currently brings together 15 telecommunication operators worldwide.

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 enable supplier compliance with social and environmental standards (SA 8000, ISO 14001) to be assessed and, if necessary, corrective action plans to be drawn up.

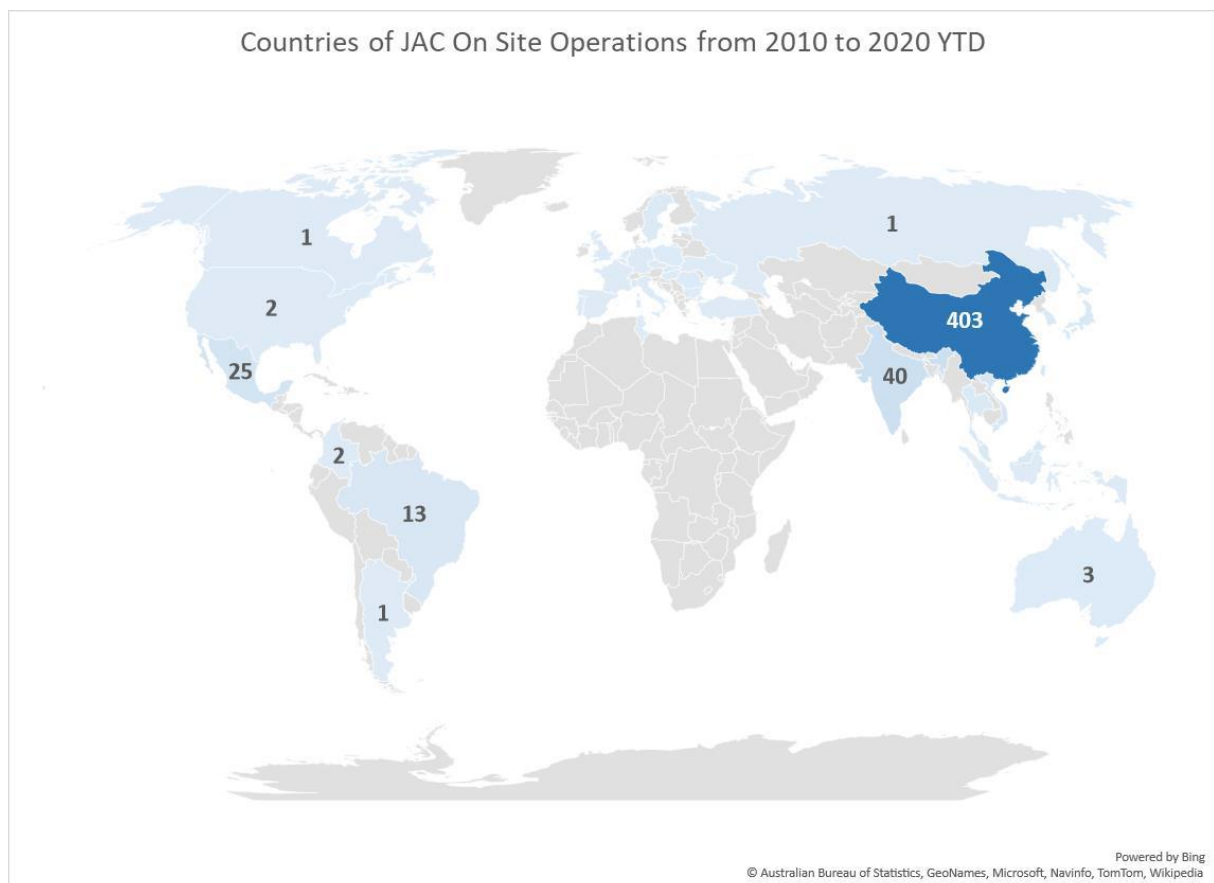
The purpose of the JAC Guidelines is to make it easier for suppliers to meet the shared CSR expectations, and to provide support for their implementation throughout the audit and monitoring process. The JAC's questionnaires include 146 items, divided into four areas (social (49), health and safety (49),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

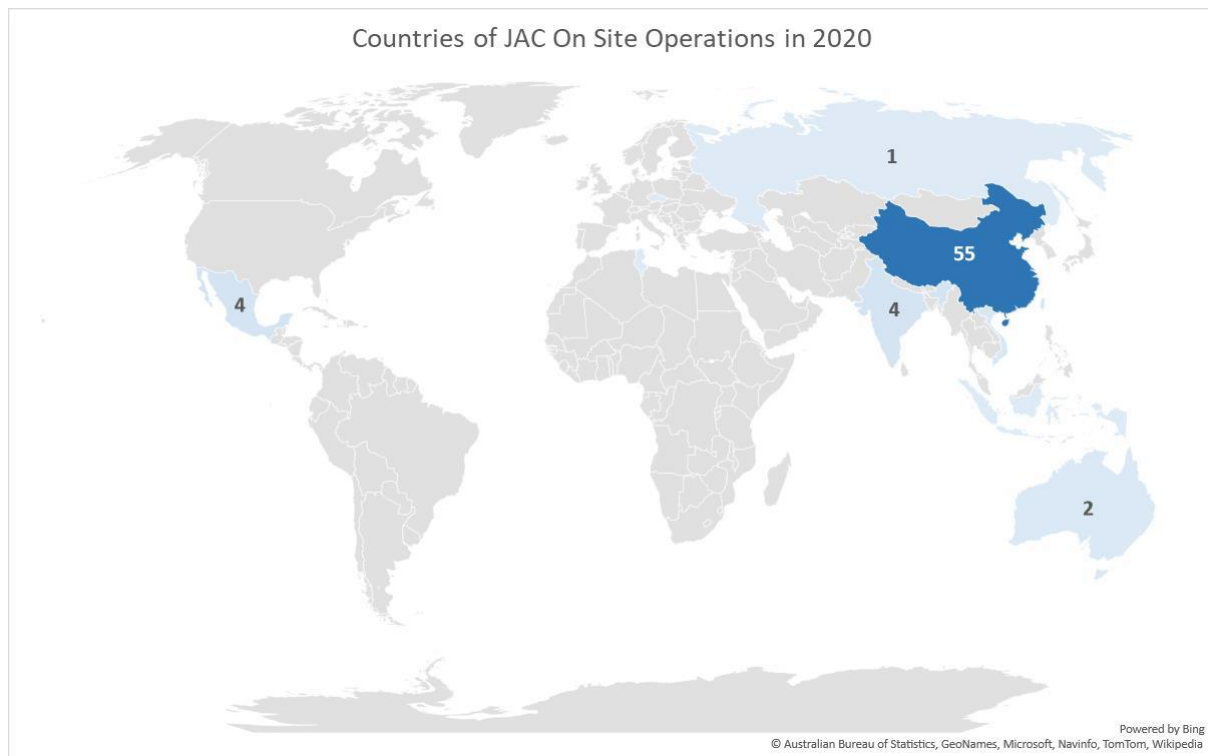
To strengthen the impact of these audits, in 2016 the JAC also launched a **pilot telephone audit** with the support of an NGO. This unprecedented method was used alongside traditional audit methods to anonymously and transparently gather the testimonies of employees, suppliers and subcontractors on various subjects such as wages, discrimination, child labor, etc.

A total of 728 on-site audits were carried out between 2010 and 2020 in 39 countries and involving 1,397,139 workers. 97% of the plants audited were located in high-risk countries. 72% of all audits were conducted in Level 2, Level 3 and even Level 4 plants (in 2019).

In 2020, JAC conducted 89 audits, including 70 on-site audits carried out directly by the JAC, six using the VAP & FLA standard (Validated Assessment Program, Fair Labor Association) and 13 investigations among workers, specifically on their working conditions. These actions made it possible to reach the level of tier-two and tier-three suppliers (68% of audits and investigations). JAC's on-site audits resulted in 665 corrective action plans being drawn up and the closure of 610 action plans relating to the current year or previous years, and impacted approximately 128,190 employees.

On-site audits took place in the following 11 countries and regions: Australia, China, Czech Republic, India, Indonesia, Israel, Mexico, Russia, Taiwan, Tunisia, Vietnam. The majority of audits were carried out in Asia, with a coverage of around 89.5%, followed by North America (5.3%), Africa (1.3%), Europe (1.3%) and Oceania (2.6%)





JAC members detected 4,732 non-compliances with CSR standards and closed 4,169 cases with corrective action plans (665) covering:

- workplace safety (45%);
- the number of hours worked (26%);
- lack of environmental measures (14%);
- business ethics (15%);

as well as the resolution of other less frequent non-compliances but which concerned in particular:

- discrimination;
- forced labor;
- non-compliant disciplinary measures;
- absence of employment contract for employees;
- lack of freedom of association.

For example, in these breaches of compliance (417), which more specifically concerned forced labor, the auditors noted cases where employees were unable to freely terminate their contracts, unjustified deductions from wages, restrictions on freedom of movement, use of surveillance cameras as a disciplinary measure without prior notification of employees, numerous cases in which workers had not received their signed employment contract or employment card, and employment contracts with much longer trial periods than those provided for by regulation.

To remedy these cases, the corrective action plans include the obligation to hand over the signed contracts to employees, the definition of a clear policy on the use of surveillance cameras, trial periods in accordance with the law, actions relating to employee recruitment companies, the delivery of employment cards, etc.

JAC has identified and addressed the following issues in Australia:

- business ethics – JAC guidelines and business ethics policies are not regularly communicated to subcontractors;
- health and safety – Some emergency exit lights were not working, the first aid kit contained medicines that were out of date;
- freedom of association – policies and procedures – no procedures or training provided on freedom of association.

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

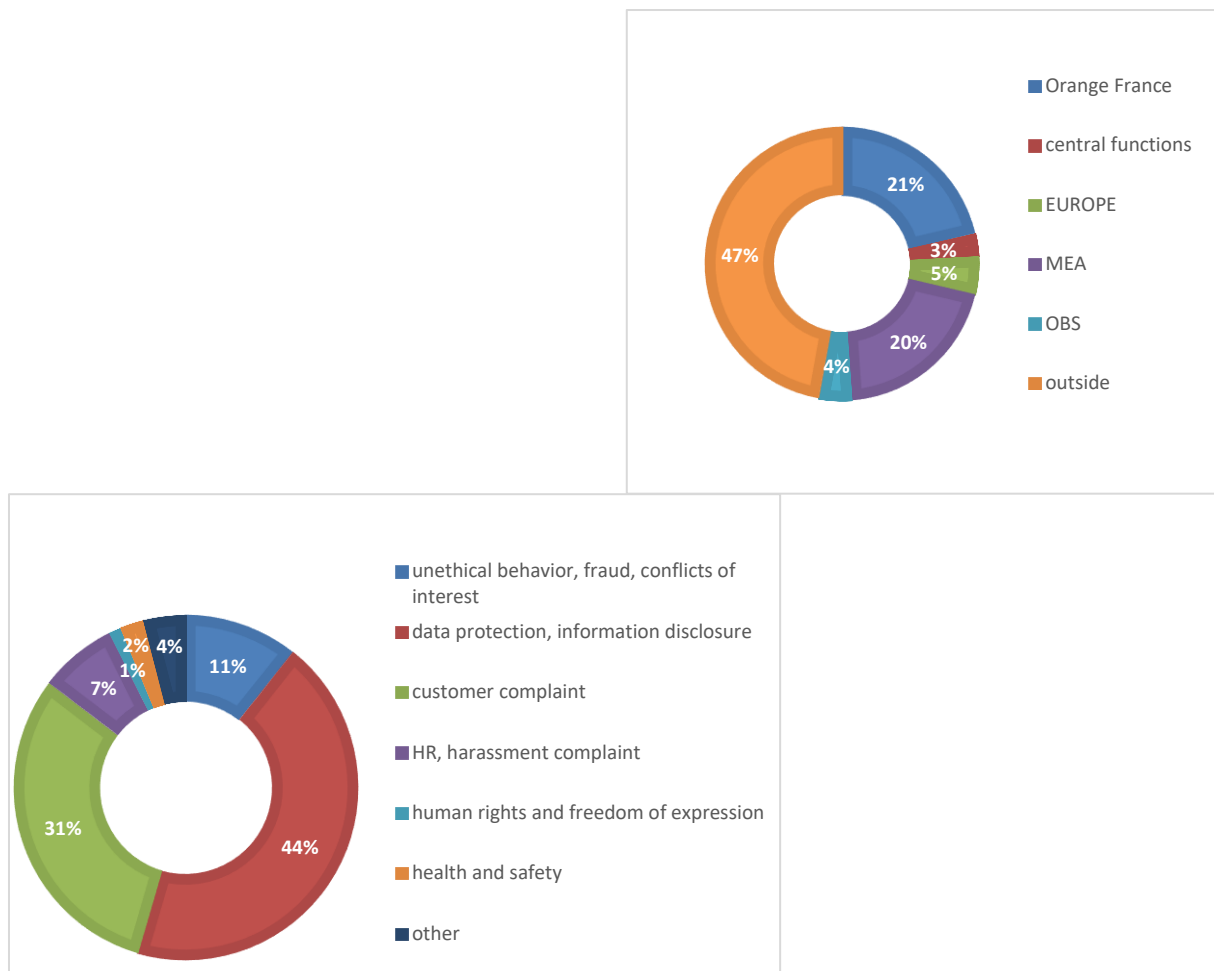
Lastly, the JAC plans to welcome new telecommunications operators so that it can expand its geographical coverage (in Asia, South America and Africa), thus indicating the global nature of its commitment.

#### 4. Whistleblowing and reporting mechanism

A Group whistleblowing mechanism has been put in place to cover offenses relating to corruption, the environment, human rights and fundamental freedoms, and personal health and safety. It is open to the Orange Group internally and externally via an email address: [deontologie.alerte@orange.com](mailto:deontologie.alerte@orange.com).

The whistleblowing system aims to encourage everyone, including employees, to report any personal knowledge of conduct or circumstances which contravene Orange's anti-corruption policy, its policies and procedures on accounting, internal control or auditing, or which constitute a serious breach of human rights and fundamental freedoms, personal health and safety or the environment.

Communication on whistleblowing systems (Group systems and local systems in Europe and Africa/Middle East) was strengthened in 2020 with, in particular, improved visibility of the address on the orange.com website and renewed communication by subsidiaries on alert whistleblowing: the number of alerts received at Group level more than tripled compared with the previous year, with a sharp increase in external messages. 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 2020 are as follows:



Reports are processed according to the procedure laid down by the Group or its subsidiaries: acknowledgement 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.

A multidisciplinary team has been working towards the opening in 2021 of an external Internet platform for the collection of alerts in order to increase the system's visibility and security.

This new web platform should provide an international, centralized service, open seven days a week, 24 hours a day, easily identifiable and accessible, both internally and externally from the Internet, and which complies with legal and regulatory requirements. This service should also make it possible to manage the Group whistleblowing systems, as well as those of the subsidiaries having joined it, using a harmonized process for collection and processing. This new service ensures as a priority the confidentiality of information, the protection of whistleblowers and the security of those in charge of processing the data.

## 5. Awareness-raising, training and sharing of best practices

### Employees

Orange has been deploying an **e-learning program for employees** since 2016, developed as part of its participation in the association *Entreprises pour les Droits de l'Homme*. It is available on the intranet, in both English and French, and 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 the pandemic period, more specific **face-to-face training** is also provided to employees directly concerned by these issues. Representatives of the CSR Department have been visiting the subsidiaries since 2018 to raise their awareness of these issues, among other things.

In 2020, Orange will roll out a **CSR visa** for all Group employees. The visa 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.

In addition, Orange is conducting a proactive policy, which is also reflected in the implementation of **training for buyers on the CSR clause** in 27 countries by the Group Procurement Department. It provides procurement managers and buyers with the necessary skills to facilitate inclusion and negotiation of CSR clauses with co-contracting parties.

The purchasing network of the Orange Group and BuyIn also provides **Supplier Code of Conduct training**.

In 2021, the creation of new training modules on Orange learning is planned, to expand technical provisions relating to the expectations of Orange subsidiaries and divisions on the deployment of the Vigilance Plan at local level as well as a module on modern slavery and human trafficking.

### The JAC Academy

The **JAC Academy** was launched in 2018 as part of a drive towards continuous improvement and the development of equivalent CSR standards within its supply chains.

The Academy enables the JAC's methodology (JAC CSR) 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 establish 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 encountered, and will be part of the sharing of best practices at the quarterly thematic JAC seminars. This process encourages suppliers to work together on the continuous improvement of CSR policies and approaches.

In 2018, five major suppliers tested this method. As a result of this approach, these five suppliers were accredited as experts to carry out JAC audits. Some 45 audits were conducted in this framework (25 in 2018 and 20 in 2019)

and seminars provided discussion on best practices in particular to prevent occupational accidents. 578 breaches of compliance with CSR standards were detected and in 331 cases, action plans enabled them to be concluded.

Due to the Covid-19 pandemic health crisis, the JAC Academy did not conduct on-site training on 2020 but prepared new training programs to be delivered in 2021.

In 2021, the JAC Academy will continue to build its JAC CSR management capacity in factories, based on a training program for ten new experts from five suppliers, and 25 new internal JAC audits are scheduled to provide a detailed verification of JAC CSR conditions on the production line.

For a number of years, the JAC has held an **annual forum in China**, which is attended by industry stakeholders (suppliers and subcontractors), NGOs (IPE, ICO, Ellen MacArthur Foundation), academic and international institutions (ILO, Global Compact, CDP), representatives of government departments, audit firms and other telecom operators.

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This statement is published in accordance with Section 54 (1) of the UK Modern Slavery and Human Trafficking Act and with section 13 of the Australian Modern Slavery Act 2018. It was approved by the Board of Directors of Orange SA on 17 February 2021. It is drafted in French and English.

Stéphane Richard  
Chairman and Chief Executive Officer

