ORANGE'S STATEMENT ON MODERN SLAVERY AND HUMAN TRAFFICKING – 2026

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This statement outlines the measures taken during the fiscal year ended December 31, 2025, to combat all forms of slavery and human trafficking. It applies to the business activities of Orange SA and its subsidiaries, particularly Globecast UK Limited, Orange Brand Services Limited, Orange Business Services Australia Pty Ltd (**"Orange Australia"**), Orange Cyberdefense UK Limited and Orange Business Holdings UK Limited (hereinafter referred to collectively as **"Orange"**), and their relationships with suppliers.

1 PRESENTATION OF ORANGE

1.1 Orange's activity and supply chain

Orange is one of the world's leading telecommunication operators, with revenue of 40.4 billion euros in 2025 and 123,500 employees worldwide on December 31, 2025, including 67,648 in France. The Group served 340 million customers worldwide (including MasOrange) on December 31, 2025, including 272.8 million mobile customers and 22.9 million fixed broadband customers. The Group is present in 26 countries.

Orange is also a leading provider of global telecommunication services to multinational companies, under the brand Orange Business, and operates in 65 countries in this market.

In Australia, the business, which is enterprise related, involves Orange Australia procuring hardware, software, connectivity, telecommunication, utility and maintenance services.

Supplier and partner expenses, which include external purchases and lease payments, represent a total expenditure of 17.7 billion euros in 2025. The providers and subcontractors are present worldwide, mainly in Europe, Asia and Africa.

Orange SA has been listed on Euronext Paris (symbol: ORA) since 1997.

In February 2026, the Group presented *Trust the future*, a new chapter in its strategy built around trust, designed to open the next phase of growth

Orange's purpose is to be a trusted partner that gives everyone the keys to a responsible digital world and its tagline is "Orange is here."

1.1.1 Value-creating business model

Orange is a major player in the global telecommunication industry. Guided by its purpose, its business model incorporates environmental, social, and societal matters to create sustainable value for all its stakeholders; this model is built on two pillars: rolling out and operating reliable, useful and resilient networks; and marketing innovative and secure digital services.

1.1.2 Description of major product and/or service groups

Orange provides B2C and B2B customers and other telecommunication operators with a wide range of products and services that make up its activities:

- Connectivity services, which mainly include mobile-only services, fixed-only services and convergent services (offers combining fixed broadband access and one or more forms of mobile access). These services may be supplemented by additional services (audiovisual content, digital

security services, entertainment services and extended connectivity). As part of its overall approach to socio-economic development, Orange also offers access to certain services (financial services such as Orange Money, energy, health and education) aimed at covering the essential needs of populations, based on its connectivity offer;

- IT & Integration Services that bring together digital work solutions (messaging services, video conferencing services, equipment rental, etc.), digital security services (consulting, project management, equipment rental, etc.), cloud infrastructure services (hosting, data center, co-location, infrastructure management, etc.), app services, solutions incorporating AI and customer contact management services;
- Wholesale services consisting of voice and mobile data traffic connectivity services (including visitor roaming), mobile virtual network operator (MVNO) offers, fixed services (including national interconnection, unbundling and Internet access, traffic sales and wholesale switched telephone network (PSTN) access);
- Fixed and mobile equipment sales, in addition to connectivity services, are based on the sale of off-the-shelf products and Orange-branded products;
- Lastly, Orange offers miscellaneous services (installation and maintenance of submarine cables, creating networks for third parties, licenses for patents and various advisory services).

1.1.3 Description of major markets and geographical locations

The Group is present as a telecommunication operator in 26 countries, including 8 countries in Europe and 18 in Africa, which constitute local markets for all its major product and service groups for B2C and local B2B customers:

- In Europe, Orange operates in France, Belgium, Luxembourg, Poland, Romania, Slovakia and Moldova; the Group is also present in Spain through its joint venture MasOrange;
- In Africa & Middle East, Orange operates in Senegal, Guinea, Mali, Guinea-Bissau, Sierra Leone, Côte d'Ivoire, Burkina Faso, Liberia, Egypt, Morocco, Jordan, Tunisia, Democratic Republic of the Congo, Cameroon, Botswana, Madagascar, Central African Republic and Mauritius.

Orange is also present worldwide:

- For retail connectivity, integration and information technology services (including cybersecurity) for multinational undertakings; and
- In the market for the roll-out of the international and long-haul network, sales of international telephony and international wholesale services, and the installation and maintenance of submarine cables.

1.1.4 Orange's value chain

- Orange's value chain can be understood by its upstream inputs: it involves licenses to operate telecommunication spectrums, obtained from the regulatory authorities of the 26 countries where Orange is an operator (including non-consolidated entities) with retail services: in particular, the operation of mobile networks involves participation in spectrum allocation procedures, which may be associated with specific obligations, in particular with regard to network security and territory coverage. It also involves the information technology and network equipment necessary for infrastructure roll-outs, as well as the handsets necessary for the provision of the service; this equipment largely comes from very sizable global suppliers common to the various operators.

- With regards to its own operations, depending on geographical location and market, Orange either operates its own fixed and mobile infrastructure (such as antennas, cables and switches) or uses networks of third-party operators under the technical, economic and regulatory conditions that apply locally, with due regard for interoperability. Orange has its own assets, its own workforce, employed in each of the countries in which it operates, as well as the entire workforce of businesses acting locally on its behalf. Orange develops new products and services that meet the needs of its customers based on technological advances. These offers may include mobile telephony, fixed telephony, Internet, television and Cloud services. Orange has its own research and development resources and favors the open innovation approach. Its experts and researchers work with an ecosystem of partners, companies, start-ups, and public and private laboratories in France and abroad. Orange also sells and distributes its services and the equipment of its brand or those of its partners. The Group caters to all audiences, with specific offers that meet the needs of businesses via a dedicated division (Orange Business) whose business scope is global. For B2C, small business and professional customers, Orange has its own distribution channels, both physical (stores, technical sales specialists, etc.) and digital (call centers, website, mobile apps), in every country where it operates. It also relies on indirect distribution channels ranging from large groups to independent retailers. Lastly, for third-party operators, Orange has offers that allow interconnection at different points of its network, and that meet different service specificities according to need. User support and the after-sales service (ASS) supplement this value chain to ensure continuity of service and maximize the experience of its customers; these services are partly based on Orange's own resources and partly on a network of global or local external service providers or subcontractors.
- Downstream, its customers use a wide range of services described in Section 1.1.2 of this statement. Lastly, while optimizing the life of equipment by maintaining, reusing or even refurbishing it, Orange ensures that its end-of-life is managed through appropriate channels, involving actors that are public, private or from the social and solidarity economy. Orange is involved, directly or through partnerships (in particular with specialized undertakings or associations of the social and solidarity economy), in the recovery, refurbishment and recycling of end-of-life products.
- The Orange value chain therefore includes the following functions:

Upstream		Own operations				Downstream	
Licenses	**Manufacture**	**Design**	**Operations**	**Sales**	**Support services**	**Uses**	**End of life**
- Obtaining telecom-munication operating licenses	- IT and network equipment required for infrastructure roll-out - Customer equipment (fixed and mobile) required to	- Network design - Product and service design - Retail telecommu-nication	Logistics, roll-out, operation and maintenance of fixed and mobile infra-structur	- Physical distribution (stores, technical sales specialists) - Digital distribution (call centers,	- User support - After-sales service	- Use of services and equipment sold by Orange to B2C, B2B and operator customers	- Recovery of end-of-life equipment (network and customer equipment)

provide the service - Virtual infrastructure and software to run the network - Other service equipment	- service s - Wholesale services - IT & integration services	- e (antennas, cables, switches) and virtual and software infra-structure - Recovery of network and customer equipment	- websites, apps) - Indirect distribution, ranging from large groups to independent retailers

1.2 Governance

Orange has implemented governance related to the direction and implementation of Corporate Social Responsibility (CSR) and to the approval of the CSR information disclosed by the Group. This framework determines the different levels of the Company that contribute to formulating, approving and controlling risk identification, and effectively implementing the prevention, mitigation or repair measures, particularly with regards to human rights violations. The implementation of the Modern Slavery Act (the UK Modern Slavery Act 2015 and Australian *Modern Slavery Act* 2018 (Commonwealth)) is incorporated into this governance. Governance for the statement on modern slavery is based in particular on the involvement of the following Orange governance bodies:

1.2.1 The Board of Directors

The Board of Directors, in accordance with its Internal Guidelines and acting on a proposal from General Management, determines multi-annual strategic guidelines on social, societal, and environmental issues. General Management also presents to the Committee the methods of implementing this strategy, in the form of an action plan with a timetable. The Board of Directors is informed of the results obtained on an annual basis. The Board of Directors also reviews the Sustainability Statement, the Vigilance Plan and its implementation, as well as the Statement on Modern Slavery and Human Trafficking. All these documents are approved by the Board of Directors.

1.2.2 The Governance and Corporate Social and Environmental Responsibility Committee (GCSERC)

The Governance and Corporate Social and Environmental Responsibility Committee (GCSERC) is a special committee of the Orange SA Board of Directors which, in the context of Corporate Social Responsibility (CSR), examines social and environmental information and documents, including this statement, prior to approval by the Board of Directors.

1.2.3 The Executive Committee

The Executive Committee monitors the Group's non-financial performance. The Executive Committee dedicates working sessions several times a year to social, societal and environmental matters. The statement is presented to Orange's Executive Committee, comprising all the Group's Executive Directors and the Chief Executive Officer, before being submitted to the GCSERC and approved by the Board of Directors.

1.3 Orange and the duty of vigilance

The Orange 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 (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 United Nations Guiding Principles and the OECD Guidelines for Multinational Enterprises.

The law on the duty of vigilance 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), and the description of such measures each year in a vigilance plan. On the one hand, its scope extends to risks and violations that may result from the activities of the Group, its subsidiaries or the companies it controls. On the other, it also encompasses the activities of its subcontractors or suppliers with which it maintains an established business relationship, and therefore its supply chain. Orange has published a vigilance plan since 2018 and a report on the effectiveness and efficiency of the measures taken since 2019. Orange's 2026 plan and its report are incorporated in the 2025 Universal Registration Document (2025 URD), Chapter 2, Section 3, which is posted on the Orange website before the Annual Shareholders' Meeting scheduled for May 19, 2026, which approves the Statutory Financial Statements[1].

Orange received the FIR-A2 award for best Vigilance Plan on three occasions, in 2019, 2022, and 2024. This award, by the French Sustainable Investment Forum (*Forum pour l'Investissement Responsable* – FIR), praises the consistency of the Group's efforts in this regard.

1.4 Stakeholder dialogues

Orange consults its stakeholders based on a structured methodology of "stakeholder dialogue," which is systematic and has been rolled out throughout Orange since 2008. These dialogues are carried out under the responsibility of the Group CSR Department and involve consultation with pre-identified internal and external stakeholders previously identified as representative on the topics addressed in the Group's sustainability matters. The questioning used provides for a semi-quantitative rating system as a way of prioritizing stakeholders' concerns and expectations. For each dialogue, a specific mapping is worked out according to the backgrounds and themes proposed; it lists the key players in the ecosystem and identifies those that are important for achieving the Group's strategic objectives, i.e. stakeholders interested in the Group's activities and stakeholders with an influence on the Group's activities.

Orange has launched the following dialogues in recent years:

- Topical dialogues: "Precariousness and digital technology" in France, "Let's talk about the duty of vigilance" at the Group level, "Young people and the business world" in Egypt, France, and Senegal, "Diversity and equality in the workplace" in several countries, "Childhood and digital

1 The 2025 Universal Registration Document is available online at orange.com.

technology" in France, and a dialogue on responsible innovation led by Orange Business, "The networks of the future" (anticipatory dialogue);
- Country dialogues on all sustainability matters: "Responsible together in a post-covid digital world" in 11 countries in which the Group is present and ESG by Design at the Group level.

In 2025, Orange also launched a dialogue called "Orange value chain: is sustainable value creation possible?" at the Group level to involve internal and external stakeholders in the value chain with the aim of proposing alliances so as to create sustainable value. The results of this dialogue will be available in 2026.

All exchanges feed into reflections on the sustainability strategy implemented by Orange and the actions to be launched to meet the expectations of stakeholders. The lessons learned from the dialogues can gradually be incorporated into the roadmaps of the Group's marketing, communication, HR and CSR business divisions and the subsidiaries carrying out the dialogues.

Information sheets and booklets containing all the ideas and opportunities related to these dialogues were disseminated internally and externally to stakeholders on the Orange website (www.gallery.orange.com). The key points of these dialogues were reported back to the Group's CSR liaison officers.

2 POLICIES IMPLEMENTED BY ORANGE TO COMBAT MODERN SLAVERY AND HUMAN TRAFFICKING

Orange intends to respect and promote human rights throughout its value chain. Risks relating to slavery and human trafficking are among those identified by Orange and which the Group is combating by adhering to international agreements, rolling out policies that establish its commitments, and putting social dialogue processes in place.

2.1 Orange's adherence to agreements

Orange has been a member of the United Nations Global Compact since 2000 and adheres to its ten principles. Orange renewed its membership in 2025, thereby asserting its commitment to respecting and promoting human rights in its activities and sphere of influence.

Orange is also a member of the ILO's Child Labor Platform, a cross-sectoral platform for eliminating child labor in supply chains with the collaboration of public entities and private enterprises.

2.2 The Orange group'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.

2.2.1 "Human rights" Group policy

The "human rights" Group policy provides the global framework for Orange's human rights commitments.

It is focused on five priorities and takes a topic-based rather than target-based approach due to the cross-functional nature of the issues addressed. The priorities are as follows:

- Promote digital citizenship: provide equal access to telecommunication services, make digital inclusion one of the pillars of Orange's social commitment and work toward ethical, inclusive and responsible innovation;
- Campaign for privacy and freedom of expression: protect customers' data and their digital identity, raise awareness of the risks associated with the use of digital data, and not restrict the right to privacy and freedom of expression;
- Act for non-discrimination and equal opportunities: encourage recognition of individual differences and develop initiatives that promote equal opportunities both internally and externally;
- Ensure decent working conditions and do business with complete confidence: provide a safe and healthy working environment for all employees, in all countries where the Group is present; ensure respect for human rights in all its activities, including those of its suppliers, subcontractors, communities affected, consumers and end-users, and act with honesty, integrity, and fairness in the conduct of its business;
- Mitigate the environmental impacts associated with Orange's activities in order to advocate for a holistic approach to human rights and the environment and ensure that its activities do not affect the health of local communities.

Ensuring and promoting respect for human rights is the responsibility of the Group's CSR Department. Operational implementation is carried out cross-functionally by various entities (Group Human Resources Department, Group Purchasing Department, General Secretariat, business divisions, etc.) through the related operational policies and documents (diversity, equity and inclusion policy; health and safety policy; personal data protection policy; Supplier Code of Conduct, etc.). It may be strengthened by local provisions.

The "human rights" Group policy applies to all Orange entities and subsidiaries, regardless of where they are located, and to all relevant stakeholders: own workforce, employees in the value chain, affected communities, and consumers and end-users.

Prefaced and signed by the Group's Chief Executive Officer, the policy and its implementation, along with related priority monitoring indicators, were presented to the Executive Committee in September 2024, and then to the Governance and Corporate Social and Environmental Responsibility Committee (GCSERC) in November 2024. The commitments under this policy are supported at the highest level of the undertaking and the chief executive officers of the subsidiaries are responsible for applying the principles of the policy in their entities.

The "human rights" Group policy complies with international standards:

- The Universal Declaration of Human Rights;
- The International Covenant on Economic, Social and Cultural Rights;
- The International Covenant on Civil and Political Rights;
- The UN Conventions on the Elimination of All Forms of Discrimination against Women, on the Rights of the Child, on the Rights of Persons with Disabilities, as well as on the Elimination of All Forms of Racial Discrimination.

All of the Group's policies with respect to its employees, workers in the value chain, customers and end-users are based on the recommendations and comply with the principles of texts developed for businesses, including the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the United Nations Global Compact principles, and the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work.

The "human rights" policy respects the principles of the international and national organizations to which the Group adheres and those in force within the sector (GSMA, ITU, JAC, *Global Network Initiative* – GNI, etc.).

The "human rights" Group policy also complies with laws on modern slavery (the *Modern Slavery Act*), the law on the duty of vigilance, and the international agreements on social rights signed with UNI Global Union. The policies with respect to its employees and workers in the value chain explicitly address the non-use of human trafficking, forced or compulsory labor and child labor.

The "human rights" policy was developed in consultation with internal stakeholders (entities responsible for the subjects mentioned in the policy) and discussed with external stakeholders with expertise in human rights and their impacts for organizations. Their contributions, in this context or in conversations with general or specialized think tanks and forward-looking labs, were integral to the action plans that represent the operational implementation of the policy's five priorities. The "human rights" policy is available on Orange's website at www.orange.com. Several presentation sessions were held at various Group entities in conjunction with the policy's March 2024 publication.

Orange actively participates in the multi-stakeholder working groups of international and national associations that promote respect for human rights in business (United Nations Global Compact, ILO, etc.) and within the sector (GSMA, ITU, JAC, Global Network Initiative – GNI, etc.). These ongoing dialogues supplement the identification and materiality of human rights issues and also help promote the Group's positions.

2.2.2 Occupational health and safety policy

In a policy memo signed in 2023 by the Executive Vice President Human Resources, which is based on the recommendations of the World Health Organization (WHO) and the conventions of the International Labor Organization (ILO), Orange confirmed that topics relating to occupational health and safety (OHS) for all Group employees are an absolute priority to ensure the Group's success and sustainability. The three policy guidelines are aligned with the company's 2025–2030 strategy and the Group's CSR approach:

- Strengthen trust through safe, peaceful working conditions;
- Enhance the performance of initiatives to improve employees' working conditions and well-being by standardizing and sharing best practices;
- Aim for excellence by strengthening the primary prevention culture (by reducing causes and risk factors).

This commitment is consistent with and based on a global health and safety agreement signed with the trade unions in November 2014 for all employees. The agreement lays down a common foundation for action for the Group in terms of occupational health, safety, quality of life at work and health protection in general. Based on a participatory approach involving all stakeholders, including

social dialogue in the field of occupational health and safety, it also includes the vigilance needed with regard to the occupational health and safety policy specific to Orange's partners and subcontractors that preceded the law on the duty of vigilance and the ISO 45001 international standard dated 2018.

The policy aims to ensure employees' safety, protect their health and improve their quality of life at work. It covers all employees in the Group's divisions and subsidiaries, across all Group regions, as well as all stakeholders, partners, subcontractors and people who may be affected by the Group's activities, and their interactions with Orange.

To that end, the policy is broken down into four main objectives set out in a three-year health, safety, quality of life and working conditions (QLWC) roadmap, which is reviewed regularly so it can be adjusted and enhanced:

- Implement an occupational health and safety management system (OHSMS);
- Apply common principles to all;
- Monitor and provide disclosure on performance indicators;
- Implement regular employee feedback.

Implementation of the policy is coordinated at the Group level by the Health and Safety Prevention Department. Its operational implementation by all the divisions, subsidiaries and entities within Orange Group takes their own laws and local contexts into account, and gives priority to soliciting regular feedback from managers, employees and their representatives and to analyzing their needs and expectations.

The Group's entities can, as needed, set up employee support programs to help them achieve a better work-life balance (parenthood, employees who are caregivers, etc.) and support public health programs. In addition, remediation measures are carried out by the divisions, which mobilize the HR and Legal Departments and, if necessary, dedicated units, as is the case in France.

A dedicated Intranet site has been developed for policy and the various communication materials useful for its roll-out. It is available to occupational health and safety and QLWC stakeholders, such as prevention specialists, human resources directors and officers, and managers. In particular, the policy is presented in a video that is gradually being incorporated into the employee health, safety and QLWC onboarding modules.

These principles, which relate to the Group's obligations of means and of result with respect to occupational health and safety or enhanced prevention within the meaning of French regulations, are also included in the global health and safety agreement negotiated with staff representatives at the Group level.

2.2.3 "Diversity, equity and inclusion" policy

In the countries where Orange is present, the Group benefits from the diverse talent and skills of its employees, who represent more than 130 different nationalities.

The aim of the Group's diversity, equity and inclusion policy is to help improve the company's collective performance by promoting an inclusive environment of trust, in which employees can turn their individuality into a strength.

This policy was formalized in 2009 and promotes diversity to ensure the inclusion of all employees, regardless of gender, social or ethnocultural origin, age, health or disability, sexual orientation or family situation.

In October 2023, the policy, which is applicable to the Group as a whole, was amended and approved by the Executive Committee, and signed and supported by the Group's Executive Vice President Human Resources.

The policy sets guidelines in three areas:

- Gender equality in the workplace, which covers an increased proportion of women, particularly those in technical and digital roles; equal access by women to positions of responsibility; equal pay for comparable positions; the fight against discrimination and violence; and work-life balance;
- Equal opportunities, which promotes a position of equity in terms of ethnocultural and social origins, age, disability and neurodiversity, sexual orientation and gender identity, or religious or trade union opinions;
- Digital equality, which covers the development of responsible and inclusive artificial intelligence; diverse backgrounds in digital professions, particularly in the innovation fields; and employees' access to digital tools.

This policy ensures that the internal processes, tools, environments and working conditions promote diversity, equity and inclusion, while maintaining a work-life balance. It also promotes these values internally and externally and encourages employees to become socially engaged (by serving as role models or mentors, etc.), reinforcing employees' engagement and well-being. It is made available to employees on the Intranet.

Its implementation is organized at the Group level by the Diversity, Equity and Inclusion Department, which coordinates a network of local liaison officers responsible for applying the policy; they coordinate implementation at the entities in their scope, adapting it to each country's local characteristics.

In developing its diversity, equity and inclusion policy, Orange considered the needs of its internal stakeholders: employees and trade unions. Orange also surveyed its external stakeholders: candidates (measurement of expectations), regulators (the "Rixain Law" in France, etc.), NGOs and associations (assessment of social challenges).

2.3 Social domain: agreements

2.3.1 Global agreement on fundamental social rights

2.3.1.1 Human rights of own workforce

In addition to the human rights Group policy, Orange signed a global agreement on fundamental social rights with UNI Global Union in December 2006.

2.3.1.2 Content of the global agreement on fundamental social rights

This agreement defines Orange's commitments in terms of respect for fundamental human rights and applies to all employees of Orange entities. It includes the following elements:

- As part of the application of the ILO fundamental conventions, Orange undertakes to take particular care to prevent the use of forced labor, modern slavery and human trafficking; prohibit child labor and exploitation; combat discrimination; ensure occupational health and safety; and respect freedom of association and the principle of collective bargaining;
- With regard to the fight against all forms of compulsory and forced labor and the prohibition of child labor, Orange condemns and prohibits the use of all forms of forced or compulsory labor2 and prohibits the employment of children under the age at which mandatory schooling ceases in the country concerned or, in any event, under 15 years of age, or 18 years of age for heavy or dangerous work[3];
- In terms of non-discrimination and as a matter of principle, the Orange group does not discriminate in any way in matters of employment relations. It hires men and women according to their skills and treats everyone with dignity, in a non-discriminatory manner and with respect for their age, social origin, family situation, gender, sexual orientation, disability, political, trade union and religious opinions, and their belonging or not belonging, whether real or assumed, to an ethnic group or nation4. This non-discrimination theme was subsequently developed in the global agreement signed in 2019 on equality in the workplace within Orange and which reaffirms its commitment to the fight against discrimination and specifies its means of action in this regard (awareness-raising, training, reporting systems and processing);
- In terms of health, safety and working conditions, Orange constantly strives to ensure the health and working conditions of its employees and ensures the medical care of its employees in compliance with local legislation. The commitment made under this agreement to implement a managed health care policy in all Orange entities was supplemented by the negotiation and signature of a separate global agreement in 2014 on the health and safety of Orange employees;
- In matters of social dialogue and relations with union organizations, Orange recognizes its employees' right to freedom of association, representation and membership in the trade union of their choice[5].

[2] ILO Conventions 29 and 105 on forced labor.
[3] ILO Conventions 138 and 182 on the minimum age for entry into work.
[4] ILO Convention 111 concerning discrimination.
[5] ILO Convention 87 (1948) on Freedom of Association and Protection of the Right to Organise.

2.3.1.3 Implementation of the agreement

Effective respect for fundamental social rights is driven by the following actions implemented by Orange and/or UNI Global Union:

- Trade union education provided jointly by management and the UNI Global Union in the event of the integration of a new country into the Group's scope based on Orange's signed agreements;
- Direct dialogue during scheduled meetings on this subject or during questioning (conflict resolution clause provided for in the agreement) concerning, in particular, escalations of collective bargaining matters in Group companies;
- Implementation of the whistleblowing system called Hello Ethics, available to employees of Group entities, allowing them to report violations of human rights and freedom of association, or of personal health and safety.

This first agreement served as the basis for the negotiation of the two subsequent agreements on health and safety and equality in the workplace. Together, the three of them form a common foundation for Orange's entities, particularly in the event of the Group's expansion.

2.3.1.4 Remediation procedures

If an investigation confirms that a violation of the human rights of own workforce has occurred, remediation falls to the local HR departments. In France, for example, an email address specifically for HSVW reports is available to all employees, and a document defining the "Framework for action for handling reports of harassment, sexism or violence in the workplace (HSVW)," intended for HSVW experts, provides the latter with a very comprehensive description of the procedure to be followed throughout the handling of the incident, with managers specifically designated for each stage. This framework for action is regularly revised based on legal, regulatory and case-law developments and on feedback from the local players in charge of the situations to be handled.

2.3.1.5 Human rights of workers in the value chain

As part of its human rights policy discussed in Section 2.2.1 *Human rights Group policy*, Orange describes its human rights commitments for all its stakeholders, including workers in its value chain.

In addition, the global agreement on fundamental social rights (see Section 2.3.1.2 *Content of the global agreement on fundamental social rights* above) also includes provisions for employees working in the value chain. In order to apply it, Orange implements:

- Direct dialogue during scheduled meetings on this subject or during questioning (conflict resolution clause provided for in the agreement) concerning, in particular, escalations of subcontractors' respect of social rights (for example during the Covid pandemic, concerning the way in which subcontractors ensured the protection of their employees);
- In terms of purchasing, the Supplier Code of Conduct and the CSR clause incorporated into the contracts remind suppliers of their obligations in terms of freedom of association, non-use of child labor, non-discrimination, diversity, inclusion, non-use of slavery and forced labor. Prior assessments or audits ensure that suppliers comply with these principles;
- The Hello Ethics system allows workers in the value chain to report violations of human rights and freedom of association, or of personal health and safety.

The mechanism for stakeholder dialogue involving workers in the value chain is based on direct dialogue through representatives of the UNI Global Union provided for in the agreement and the

Mobile Worker Survey organized by Orange as part of the JAC audits. Any negative impacts identified in the JAC audits are monitored and addressed through corrective action plans. The CSR clause requires the Group's suppliers to notify Orange if they become aware of any breach of the supplier code of conduct or of the international human rights frameworks, to use all appropriate means to remedy this breach, and to inform Orange of the cessation of such breach.

2.3.2 Global agreement on gender equality in the workplace within Orange

In keeping with the main principles of the diversity, equity and inclusion policy, in 2019 the Group signed a global agreement on gender equality in the workplace, the fight against discrimination and violence (including harassment), and work-life balance with UNI Global Union, stating that "Orange develops its Corporate Social Responsibility as an international group in line with its adherence to the United Nations Global Compact, the principles set out in the Universal Declaration of Human Rights, and the standards of the International Labor Organization prevailing in the countries where the Group operates."

The goal of the agreement is to operationally implement the key principles of the policy applicable to the entities and to establish a monitoring framework by relying on a structured local social dialogue that allows local assessments to be carried out and appropriate action plans to be defined.

The agreement specifies several resources to be deployed, such as a uniform measurement of pay gaps in all countries, training of managers and HR on discrimination issues, partnerships with local associations, awareness-raising actions and communications on these topics.

It is monitored through indicators, which are reported annually to UNI Global Union. In each country, local committees manage these indicators in a proactive and participatory approach suited to the national context.

2.4 Social dialogue processes

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:

- The Orange-UNI Global Union Alliance;
- The employee representative bodies;
- The European Works Council;
- The Worldwide Works Council.

Orange maintains a constant social dialogue and has developed tools for international social dialogue in addition to the social dialogue that takes place in the Group's companies, according to the rules and practices applicable locally.

2.4.1 UNI Orange Global Union Alliance

Within Orange, the national unions that are members of the UNI Global Union international trade union federation are organized into an alliance: the UNI Orange Global Union Alliance. In 2025, around 20 European and African unions present at Orange joined the Alliance. Indeed, Orange has long engaged in a high-quality dialogue with UNI Global Union, which represents more than 20

million workers in 150 countries working in the services sector, including the telecommunication sector.

The joint declaration (known as the "Douala Declaration") signed in 2018 governs the functioning of the UNI Orange Global Union Alliance and reaffirms the importance of a global social dialogue. This declaration provides for two formal annual meetings between Orange Management and the UNI Orange Global Union Alliance, which was the case in 2025.

The meetings are an opportunity to take stock of progress concerning the roll-out of the global agreements. They also allow for an open debate on matters of global interest such as artificial intelligence and its possible impacts.

Orange has signed three global agreements with UNI Global Union. These agreements define principles that apply to all employees of Orange companies:

- The global agreement on fundamental social rights (see Section 2.3.1.1 *Content of the global agreement on fundamental social rights*);
- The global health and safety agreement (see Section 2.2.2 *Occupational health and safety policy*);
- The global agreement on gender equality in the workplace within Orange (see Section 2.3.2 *Diversity, equity and inclusion policy*).

2.4.2 European Group Works Council

The Orange European Works Council was created by an agreement dated April 14, 2004. It represents the Group's employees in the European Union and the European Free Trade Association (EFTA, including Norway and Switzerland). It is currently composed of 23 employee representatives from 18 countries.

The council is a forum for discussions and social dialogue on economic, financial and social issues. It deals with matters that concern all Group companies, or at least two companies in two member countries. Management informs and consults European employee representatives on any major decisions at European level that could impact working or employment conditions.

The agreement provides that the council will meet at least three times a year. In reality, it meets more often due to the internationalization of the transformation projects. In 2025, the council met seven times.

2.4.3 Worldwide Works Council

The Orange Worldwide Works Council was created by an agreement dated June 23, 2010. It represents the Group's employees in all the regions where Orange is present and has more than 400 employees. It is currently composed of 34 employee representatives from 27 countries.

This council is a forum for social dialogue allowing information to be exchanged on economic, financial and employee-related issues with a transnational impact. It enables the sharing of the Group's strategy and challenges. This body is part of Orange's Corporate Social Responsibility development strategy. A representative of the Worldwide Works Council participates, without a vote in resolutions, in some of the meetings of Orange's Board of Directors.

The Worldwide Works Council meets at least once a year. Ad hoc meetings may be organized if necessary. Meetings are chaired by the Group Executive Vice President Human Resources. In 2025, the Council met in June, with a presentation of the strategy by the Chief Executive Officer.

2.4.4 Local social dialogue

Neither the European Group Works Council nor the Worldwide Works Council are replacements for the national representation bodies in place and governed by local regulations.

As regards social dialogue in France, in 2025, the Corporate Social and Economic Committee of UES Orange (CSEC) met 22 times, mainly for recurring information-consultation meetings (strategy, the company's economic and financial position, social policy, employment and working conditions), for discussions on health and safety, and for ad hoc information-consultation meetings, mainly concerning changes in the organization and structure of the Group.

The French Works Council, which brings together the Group's subsidiaries in France with employees, met four times during fiscal year 2025, dealing with information relating to the Group's financial position, business and employment trends.

2.5 Promoting respect for human rights among suppliers and subcontractors

2.5.1 The Group purchasing policy

In 2024, Orange adopted a new Group purchasing policy signed by the Executive Director Finance, Performance and Development and the Group Purchasing and *Supply Chain* Director. This policy was updated in 2025. Its main objectives are to continuously improve the Group's operational performance, the protection against supplier-related risks and the fulfillment of the Group's social and environmental commitments. As part of this policy, Orange mainly describes the commitments and respect for human rights that it expects from all its suppliers, subcontractors and partners.

Orange requires its suppliers to comply with its CSR standards and to apply them to their own purchasing processes. It does this in particular 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.

The Group purchasing policy applies to all Group entities. The country and entity purchasing teams are responsible for its implementation within their scope.

The main points of the Group purchasing policy are made available to all Orange stakeholders on the purchasing portal for suppliers[6]. The new Group purchasing policy has been communicated to all staff members affected by its application.

The implementation of the responsible purchasing component of the purchasing policy is overseen by the Responsible Purchasing Committee for all Group entities and subsidiaries. This committee ensures the integration of CSR requirements into purchasing processes and contracts, in particular through the CSR clause, the supplier code of conduct and Orange's responsible purchasing commitments.

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[6] https://fournisseurs.orange.com/en/our-group-sourcing-policy/

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;
- support the implementation of these commitments through joint actions by the Group CSR and GPS Departments;
- monitor the proper implementation of these commitments by tracking key performance indicators and the effectiveness of the measures put in place;
- ensure that changes in CSR regulations are anticipated and integrated into purchasing processes.

The role of this committee is also to support the dissemination of CSR culture to buyers through responsible purchasing training and to support CSR risk management through supplier assessments and audits.

2.5.2 Orange's responsible purchasing commitments

The Group purchasing policy is clarified through the responsible purchasing commitments updated in 2025, based on the principles of the ISO 20400 standard. These commitments are also based on international standards, including the Universal Declaration of Human Rights, ILO standards, OECD Conventions, as well as the commitments made by Orange, such as the United Nations Global Compact, and the agreements signed in 2006 and 2014 with the UNI Global Union.

In accordance with the Group purchasing policy, Orange's responsible purchasing commitments focus on the following major objectives:

To develop balanced relationships with its suppliers, based on the concepts of trust, respect and the sustainability of the business relationship	**To continuously improve the Group's financial performance by creating sustainable value**	**To manage risks and understand the CSR opportunities related to the Group's purchasing and supply chain**	**To ensure that the Group and its customers benefit from the know-how of its innovative and efficient suppliers**

Orange's Responsible Purchasing Commitments are formalized in a contract through the CSR clause, which refers to the supplier code of conduct (Group and local suppliers). These commitments are therefore applicable to all its subsidiaries and entities, to the purchasing and supply chain activities and to the purchasing delegated to BuyIn, the joint venture between Orange and Deutsche Telekom, in the context of relations with all their suppliers and subcontractors. Like the Group purchasing policy, the main points of Orange's responsible purchasing commitments are made available to all Orange stakeholders on the purchasing portal for suppliers and on the Orange Intranet.

2.5.3 "Responsible Purchasing" label

The "Supplier Relations and Responsible Purchasing" label was renewed in 2025 for Orange France. This label is issued 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. In 2025, the Group Purchasing Department also underwent an ISO 20400 maturity assessment and was awarded the "significant" level (third level out of four). That label is a vehicle for progress and performance, aimed at developing lasting, trust-based, balanced relationships between customers and suppliers. It is fully aligned with the Group's major responsible purchasing challenges.

More specifically, through the 15 criteria under the Plan, Do, Check, Act (PDCA) 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 deadlines in accordance with French law 2008-776 of August 4, 2008, on the modernization of the economy;
- Advance supplier payment for SMEs/VSEs – formerly known as collaborative reverse factoring which consists of a responsible short-term financing program set up by the ordering party (buyer) to support its suppliers' cash flow, making it possible to pay their invoices in advance through a factoring company in exchange for favorable financing costs;
- Specific payment periods reduced to 30 days for companies labeled as innovative start-ups or SMEs;
- Taking the region into account when it comes to local suppliers;
- The use of mediation to resolve any disputes.

2.5.4 Inclusive and solidarity-based purchasing in France

In 2025, Orange purchased 20.8 million euros of services from just under 300 suppliers in the protected and adapted labor sector (PALS)[7]. This brings the cumulative total of purchases made with these players since 2021 to 98 million euros. The "inclusive potential" of tenders is analyzed as soon as the Group Purchasing Department's annual roadmap is drawn up. A selection of suppliers regularly makes presentations to targeted buyers and requisitioners. In 2025, Orange carried out an assessment process on purchases made with suppliers from the social and solidarity economy (SSE) in France, in order to understand the volumes and expand the process to the Group's countries. These purchases consist of inclusive purchases (entities identified as working in the field of integration through economic activity (IEA) and in PALS) as well as all SSE players, such as associations, cooperatives, mutual societies, foundations and business enterprises in the SSE. This approach has made it possible to value all the services ordered by Orange in France from players

[7] PALS (protected and adapted labor sector) refers to a group of institutions and services dedicated to the employment of people with disabilities. This sector mainly includes adapted companies (where at least 55% of employees are people with disabilities) and French organizations that help people with disabilities enter the workforce (*établissements et services d'aide par le travail* – ESATs).

whose main purpose is a proven social and environmental impact. In 2025, an initial estimate of Orange's purchases in France from the SSE sector, according to the INSEE classification, put them at around 84 million euros.

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

3.1 Risk identification

For the purposes of identifying risks under this statement, Orange relies on the mapping established for the duty of vigilance.

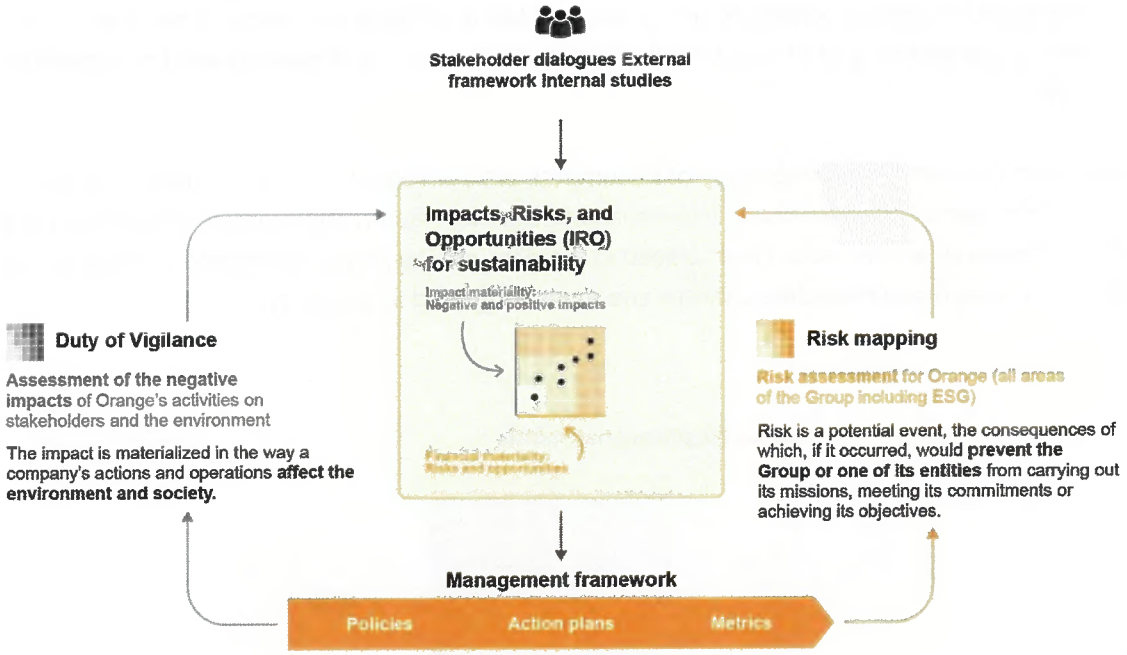
The identification of risks in terms of human rights is based on the recommendations of texts developed for businesses, including the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the Ten Principles of the United Nations Global Compact and the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work. The identification process is also supported by the activities carried out by the CSR Division regarding human rights (monitoring, activity report, partnerships, etc.).

3.2 Risk analysis methodology

3.2.1 Coordination with the double materiality exercise

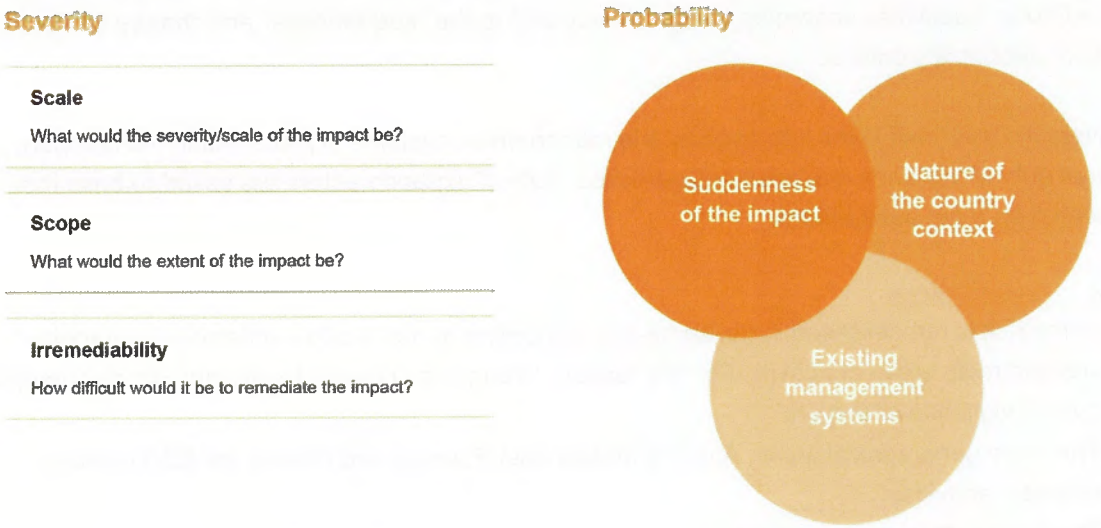
In 2025, the methodology for the assessment of duty of vigilance risks, based on the United Nations Guiding Principles, was revised with a view to ensuring consistent coordination with the negative impacts identified in the double materiality exercise of European Directive 2022/2464 of December 14, 2022, concerning the publication of sustainability information by companies, the so-called *Corporate Sustainability Reporting Directive* (CSRD).

This coordination with double materiality enables complementary internal control of the two exercises, with each feeding into the other in a continuous improvement loop. As such, it informs the sustainability statement with regard to impact materiality (negative impacts), in particular in the updating of action plans.



3.2.2 Assessment methodology

Risk assessment is based on two factors: severity and probability of occurrence. Each factor consists of three criteria, as described in the diagram below.



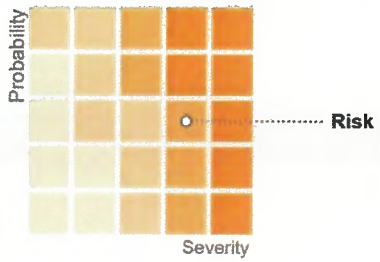
In order to facilitate the assessment and make the exercise objective and reliable, the duty of vigilance liaison officers use the following assessment assistance tools:

- Assessment grids on five levels qualify the three severity criteria. These grids are specified for each risk associated with the duty of vigilance;

- The country context that informs the probability calculation is based on the expertise of Verisk Maplecroft, a leading consulting firm. Based on UN and OECD standards, these analyses are used to gauge the level of country risk linked to the human rights context and to heighten its vigilance.

The results of severity and probability of occurrence are then positioned on a matrix, as shown below. This matrix considers severity to constitute the main factor, and that the company must act to address the most severe risks. Risks placed in the dark orange zones (exceeding severity level 3 and probability level 3) are considered salient and must be treated as a priority.

Duty of vigilance risk matrix



3.2.3 Net and gross risks

The assessment of the duty of vigilance risks is presented before the implementation of its management systems, i.e. according to a "gross" approach. This consists in measuring the exposure of the Group's activities according to the severity and to the "suddenness" and "nature of the country context" probability criteria.

Conversely, "net" risk takes into account the management systems in place within the company. For internal duty of vigilance management purposes, duty of vigilance actors are asked to base their reasoning on a net assessment.

3.2.4 Consolidation

The same risk is not assessed in the same way according to the Group's different geographical regions and main areas of activity. For this reason, Orange has chosen to structure its risk analysis of the duty of vigilance based on:

- The three geographical areas, Africa & Middle East, Europe, and France, for B2C network operator activities;
- The Orange Business segment;
- The Orange Cyberdefense segment;
- Its "Orange Wholesale" activities;
- Its tertiary activities comprising the cross-cutting departments.

The map of the Group's geographical locations and key figures, including the headcount of employees, by business segment, is presented in Section 1.1.1 *Orange's activity and supply chain*.

The consolidation exercise by geographical area or major areas of activity consisted in aggregating, for each of the risks, all the assessments of the entities, countries, or divisions within the given scope. Either the reported data converged to a single level of assessment, in which case that assessment was used for the consolidation exercise, or the data diverged from one entity to another, giving rise to arbitration by the Executive Director of the scope concerned on the basis of qualitative, quantitative or contextual criteria.

3.3 Risks linked to "violations of human rights"

The identified risks relating to potential violations of human rights and fundamental freedoms that concern Orange are as follows:

- Forced labor or human trafficking within the framework of a known established contractual relationship;
- Indecent working conditions at suppliers' and subcontractors' premises: compensation that does not allow an adequate standard of living, right to rest, etc.;
- Child labor at suppliers and subcontractors with 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 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); and
- Violation of privacy.

Definition of the concept of stakeholders and affected persons

For the purposes of this statement, and Section 3.3.1 below in particular, the term "stakeholders" refers to natural persons who, in a specific context or situation, may be affected by the activities of the company. As such, the analysis of the Vigilance Plan is based more on the notion of rights holders, namely an individual who, under the Universal Declaration of Human Rights, possesses or benefits from guaranteed fundamental rights that they can assert.

For each risk, the analysis highlights the persons most affected based on one or more factors:

- Proximity to the activity (e.g. workers on technical sites, etc.);
- Structural vulnerability (e.g. informal or subcontracted work, etc.);
- Asymmetry of power (e.g. weak local legal protection, etc.);
- At-risk context (e.g. conflict zone, etc.).

3.3.1 Description of the risks relating to this statement

The risks are defined below:

3.3.1.1 Forced labor or human trafficking

Forced or compulsory labor refers to any work or service that is required of someone under the threat of punishment, and for which the person has not volunteered.

Human trafficking is characterized by the recruitment, transport, transfer, accommodation or reception of persons carried out under threat, use of force or other forms of coercion or deception, for the purpose of exploitation.

Given the depth and complexity of the value chain, the identified risk is that the Group indirectly resorts to forced labor or human trafficking due to its established business relationships with suppliers or subcontractors.

Those most affected: the employees of suppliers and subcontractors, according to the criteria defined in *Definition of the concept of stakeholders and affected persons* in Section 3.3.

3.3.1.2 Indecent working conditions

The notion of decent work covers access to work subject to a contract with a salary making it possible to live with dignity, ensuring safety in the workplace, social protection for families, freedom for individuals to express their demands and freedom to organize and to have a say in decisions that affect their lives, as well as equal opportunities and treatment for all.

Given the depth and complexity of the value chain, the risk identified is that due to its established business relationships with suppliers or subcontractors, the Group does not offer employees decent working conditions, in violation of the rights of the workers concerned.

Those most affected: the employees of suppliers and subcontractors, according to the criteria defined in *Definition of the concept of stakeholders and affected persons* in Section 3.3.

3.3.1.3 Child labor

Child labor is defined as work that is harmful to the health, education and development of children (health, education, safety and morality), thus depriving them of their childhood and compromising their schooling. The ILO Conventions define the framework of national legislation, which must prescribe a minimum age for admission to employment or work that must not be lower than the age of completion of compulsory education, and in any case not lower than 15 years. However, a lower threshold is permissible during a transition period in countries where the economy and the education sector are less developed, with the minimum age generally being 14 years, and 12 years for light work. On the other hand, the minimum age for hazardous work is higher, at 18 years for all countries.

Given the depth and complexity of the value chain, the risk identified is that the Group, due to its established business relationships with suppliers or subcontractors, has recourse to child labor that does not respect the minimum legal age in force in the country concerned, and therefore violates the rights of these children.

Those most affected: the employees of suppliers and subcontractors, according to the criteria defined in Definition of the concept of stakeholders and affected persons in Section 3.3.

3.3.1.4 Infringement of freedom of association and right to collective bargaining on working conditions

Freedom of association represents the right of workers and employers to freely and voluntarily form or join organizations in order to promote and defend their professional interests. Collective bargaining is a voluntary process that allows employers and workers to discuss and negotiate their relationships, particularly with regard to working conditions.

The risk identified is that the Group violates the freedom of association and/or the right to collective bargaining, directly or indirectly, due to its established business relationships with suppliers or subcontractors.

Those most affected: employees and their representatives, and the employees of suppliers and subcontractors, according to the criteria defined in Definition of the concept of stakeholders and affected persons in Section 3.3.

3.3.1.5 Acts of discrimination

Discrimination in employment and occupation is characterized when a potential or salaried candidate is treated differently, or less favorably, because of characteristics unrelated to merit or the requirements inherent in the job. Among the prohibited grounds of discrimination, the following characteristics are generally mentioned: ethnicity, origins, opinions, gender and sexual orientation, disability and social origins.

The risk is that the Group will have recourse to discriminatory measures to certain employees in violation of their rights, directly or indirectly, due to its established business relationships with suppliers and subcontractors.

Those most affected: employees and their representatives, and the employees of suppliers and subcontractors, according to the criteria defined in Definition of the concept of stakeholders and affected persons in Section 3.3 of this report.

3.3.2 Assessment and prioritization

The risk matrix below summarizes Orange's gross risk in terms of human rights in relation to this statement:

	Orange's organizational structure						
	Orange France	Orange Europe (excluding France)	Orange Africa & Middle East	Orange Business	Orange Wholesale	Orange Cyberdefense	Cross-cutting departments
Human rights							
Forced labor or human trafficking	○○	○○	○○	○○	○○	○○	○○
Indecent working conditions	○○	●○	●○	●○	○○	○○	○○
Child labor	○○	○○	○○	○○	○○	○○	○○
Infringement of the freedom of association and right to collective bargaining	●○	○○	○○	○○	○○	○○	○○
Discrimination	○○	○○	○○	○○	○○	○○	○○

●● High gross risk.
●○ Medium gross risk.
○○ Low gross risk.

3.3.3 Reporting and measures taken to prevent and mitigate the risks

3.3.3.1 Indecent working conditions

As Orange's activities are integrated into long and complex international production chains, some suppliers, particularly in the mining, network and civil engineering, security, maintenance, distribution, end-of-life equipment processing and call center sectors, present a structural risk of human rights violations.

The risks to people are social and economic: indecent working conditions, low pay and non-respect for fundamental rights negatively impact the lives of employees and their families, particularly in the areas of food, health, education and housing. These risks are accentuated by systemic risks due to heterogeneous human rights protection in certain sensitive geographical areas, which increases the vulnerability of all actors in the supply chain.

The Group has put in place tools to prevent these risks: CSR clause, Supplier Code of Conduct, controls by means of audits conducted by the Joint Alliance for CSR (tools described in Chapter 4 below).

Governance is strengthened by a Responsible Purchasing Committee, which is responsible for ensuring the application of the principles of Responsible Purchasing in the Group. This Committee is supported by the Purchasing and Human Rights working group, co-led by the Group CSR Department and the *Global Procurement & Supply Chain* Department (see Section 2.5.1 *Responsible Purchasing Policy),* which coordinates actions to reduce these risks. These actions include training suppliers on human rights, strengthening actions within the JAC and developing inclusive and solidarity-based purchasing practices with social impact actors, as well as research on the social life cycle analysis of products and services to identify social and societal impacts.

The Group uses the Verisk Maplecroft tool to assess country risks in the countries in which it operates, identifying the most sensitive geographical areas.

3.3.3.2 Child labor

After experiencing an unprecedented increase during the Covid-19 pandemic, in 2024[8] the number of children forced to work decreased by at least 20 million compared with 2020. The 2024 estimates confirm that sustained investment in free, high-quality education, effective labor inspection and universal social protection have accelerated progress. However, the number of children forced to work is still higher than the United Nations target for 2025.

In 2024, out of 137.6 million children engaged in child labor, 27%, i.e. 36.7 million, are in the service sector and 13% in industry, compared with 61% in agriculture. Child labor is thus particularly prevalent in rural economies, informal sectors and in situations of crisis, conflict, displacement or environmental disaster, and no geographical area is spared, including Europe (middle-income countries, ongoing conflicts, migration, etc.).

[8] 2024 Global Estimates of Child Labor – Report.pdf/International Labor Organization and United Nations Children's Fund, Child Labor: Global estimates 2024, trends and the road forward, ILO and UNICEF.

While child labor constitutes a structural risk recognized in several countries by international organizations, direct exposure to this risk is limited for Orange by the nature of its activities, which are exclusively related to digital and telecommunication services operated in a formal framework, and strict contractual requirements with regard to partners and suppliers.

Consequently, the gross risk of child labor is assessed as low for the operational scope concerned and analyzed, which does not exclude recognition of the structural risk, taking into account the depth of the value chain of the digital sector, such as the mining necessary for the manufacture of equipment, in which nearly one million children work, according to the ILO.

For this reason, this risk is regularly monitored or is subject to strengthened control mechanisms for two countries in the Africa & Middle East region: the Democratic Republic of the Congo and Madagascar, where the context requires any changes in the conditions or scope of activity to be considered.

3.3.3.3 Infringement of the freedom of association and right to collective bargaining

In the first half of 2025, several reports were brought to Orange's attention of violations of the freedom of association of employees of service providers whose activities are outsourced abroad. The reports received, investigated in collaboration with the partner, were the subject of media attention.

This confirms a fundamental trend that has been emerging in recent years with increasing tension about trade union law and more generally on the subject of respect for human rights and labor law in the outsourced services sector, especially in countries at risk. This trend is corroborated by the work of an association campaigning to ensure companies take human rights into account (see the report *Prestations de services externalisées, grandes oubliées du radar de vigilance des entreprises* [Outsourced Services: a Major Blind Spot in Companies' Duty of Vigilance Radar], EDH – Entreprises pour les Droits de l'Homme[9], July 2025).

In the context of rapid transformation of the customer relationship through the use of new artificial intelligence solutions, greater attention must be paid to the potential impacts on the rights and freedoms of employees and on working conditions.

4 STEPS TAKEN TO MITIGATE OR PREVENT RISKS OF VIOLATING HUMAN RIGHTS

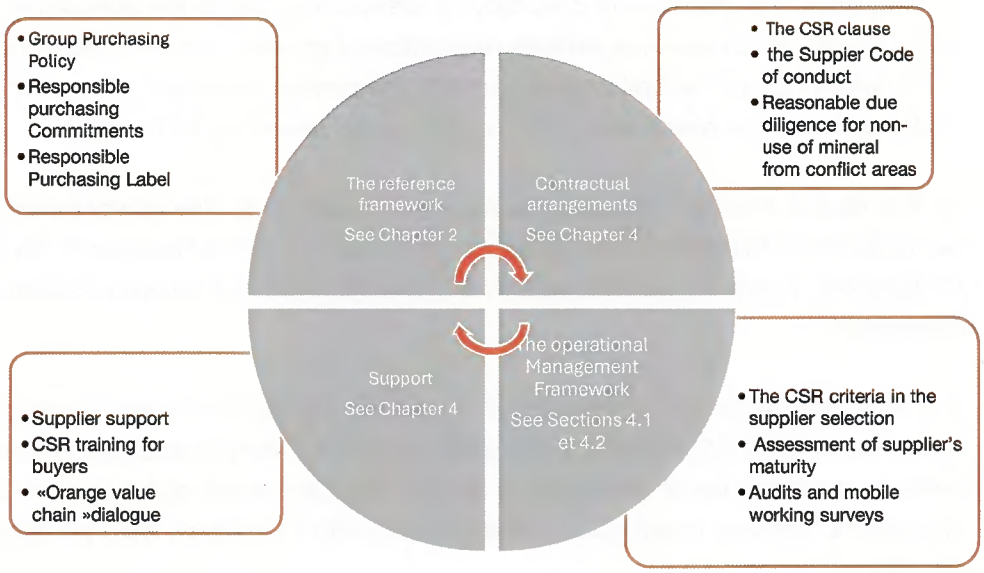
4.1 Steps for the assessment, selection, and support of suppliers

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

Orange's management of its suppliers and subcontractors regarding duty of vigilance risks is based on a range of measures, both contractual and operational.

[9] https://www.e-dh.org/en/

The diagram below provides a comprehensive overview of the entire system, with details provided in in the chapters or sections of this statement referenced in the diagram:



4.1.1 Considering Orange's expectations in terms of respect for human rights in the value chain: Supplier Code of Conduct and CSR clause

With the automatic inclusion of the CSR clause referring to the Supplier Code of Conduct and to Orange's responsible purchasing commitments in all its purchasing contracts, Orange requires its partner stakeholders, suppliers and their own subcontractors in all regions as soon as the contract is signed and throughout its period of validity:

- To comply with all national, European and international regulations governing ethical and responsible behavior. This includes, but is not limited to, standards dealing with human rights, occupational health and safety, environmental protection, sustainable development, the fight against corruption and child protection;
- To adopt and apply the Group's ethical standards and commitments and make progress in these areas.

The inclusion of this CSR clause in contracts is the subject of a specific metric.

The Orange Supplier Code of Conduct[10] describes the ethical, social and environmental commitments expected by the Group. A new version of the document took effect in 2025 to strengthen conflict of interest obligations with regard to suppliers and subcontractors.

[10] https://fournisseurs.orange.com/wp-content/uploads/coc_en.pdf

The obligations that are specific to human rights and working conditions are as follows:

Child labor	The supplier is prohibited from employing people 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 ban in its supply chain. If it is discovered 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. The supplier must combat all forms of discrimination in relation to ethnic origin, skin color, 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.
Non-use 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 labor within the meaning of the ILO convention on forced labor. 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 own supply chains.
Pay	Suppliers must provide compensation in line with national regulations on minimum wages. In the absence of national regulations, pay 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 time	Working time, including overtime, must comply with applicable local laws. In the absence of national legislation, ILO standards must apply. 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. The supplier must take the necessary measures to prevent occupational accidents and illnesses. They must regularly hold appropriate training sessions to ensure that workers have sufficient occupational health and safety knowledge. This includes the provision of appropriate personal and collective protective equipment and instructions on their use. When providing accommodation, suppliers must ensure that it 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 (OHSMS), based on international standards such as ISO 45001 or equivalent.

In Australia, along with the requirements for suppliers to adhere to the Group's Supplier Code of Conduct, comply with corruption prevention laws, economic sanctions and the CSR standards, the purchasing contract also mandates compliance with the *Australian Modern Slavery Act 2018*. Suppliers must also provide information on the measures and controls they have implemented to ensure compliance upon request. Orange Australia continues to update its existing contracts to include clauses on Moderns Slavery Act compliance and will continue to do so during contract renewals These efforts have been successful, with new supplier contracts incorporating these requirements.

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. Orange Cyberdefense UK uses the same principles, commitments and clauses to ensure that its suppliers comply with modern slavery law.

4.1.2 Implementing CSR criteria in Orange's supplier selection

In order to improve the consideration of CSR performance in its supplier selection process, Orange incorporates CSR criteria in 10% to 20% of the score given to suppliers in purchasing decisions for purchasing projects in certain areas (IT and networks, fixed customer equipment, etc.) for amounts exceeding 1 million euros. This action plan is a process of continuous improvement and has no defined time horizon.

Half of the CSR score (see Section 4.1.3 below) is an assessment of the supplier's overall CSR maturity and half is composed of environmental criteria specific to the product purchased by Orange, depending on the above-mentioned areas.

The weighting of CSR in the decision criteria for all purchasing projects in France led by the Group Purchasing Department 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.

In addition, depending on the human rights issues and risks, specific requirements may be included in the specifications attached to requests for proposals.

4.1.3 Assessing the CSR maturity of Orange suppliers

An assessment of suppliers' CSR maturity must be carried out before entering into 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" is defined by the Group duty of vigilance manager and GPS, taking into account the impact on health-safety, human rights and the environment, the probability of occurrence of risks, and the specific characteristics of the geographical regions of the Orange entities making the purchase.

This list has been shared with all players involved in assessing suppliers' CSR maturity. In order to guarantee the independence and quality of the analysis, supplier assessments were entrusted to a partner undertaking, whose methodology is based on international CSR standards and guidelines such as the United Nations Global Compact, ISO 26000, ILO or the *Global Reporting Initiative* (GRI).

Supplier CSR maturity assessments include questions in relation to respect for the health, safety and working conditions of their employees and those of their suppliers. When analyzing the results, Orange's teams pay particular attention to these two dimensions.

Orange's activities are global in scope. In order to adapt to the specific local characteristics of the Group's entities, the CSR analysis may be based on an internal assessment by Orange in the form of a questionnaire.

This assessment process and the objectives pursued are mandatory.

In relation to this, the supply chain for Australia has not undergone much change since the last time when Orange Australia concluded the review and assessment of its supply chain for modern slavery risks and at present does not consider that there is a modern slavery risk that requires a separate assessment.

In 2025, Orange Australia reviewed and updated its supplier database to ensure the information was accurate and current. Additionally, the supplier onboarding process now requires Australian suppliers to answer compliance related questions including those pertaining to Modern Slavery Act. These measures, including the screening the high-risk suppliers in Australia, have been effective, with no instances of Modern slavery identified within the Australian supply chain.

Moreover, in 2026, Orange Cyberdefense UK will update its integration process for suppliers who have a higher risk of modern slavery and monitor it as a key criterion to be fulfilled for the integration of its suppliers in the United Kingdom.Orange Cyberdefense UK will include the Orange Supplier Code of Conduct as an Appendix to all Supplier Agreements which contains an obligation to comply with all applicable Modern Slavery laws and regulations .

In addition, Orange Brand Services Limited has developed its own onboarding/due diligence process for supply chain management. This process provides visibility of suppliers and of the company's immediate supply chain and purchased commodities. The business of Orange Brand Services Limited does not involve the manufacture or sale of physical products, with a supplier base that primarily consists of professional services and the supply of such sundry goods as a necessary to operate the business. As such, Orange Brand Services Limited does not consider there to be a modern slavery risk that requires assessment, however, this position is kept under review.

4.1.4 Improving knowledge and supporting suppliers on human rights

In 2024, Orange's Responsible Purchasing Committee commissioned a working group composed of members of the Group's CSR and Purchasing departments, in order to develop substantive actions to improve knowledge of the challenges and impacts associated with supply chain workers and to better support suppliers in their own consideration of these issues.

Specific actions for telecom equipment suppliers

Telecom equipment suppliers are characterized by the depth of their supply chain, which makes all the risks to which workers are exposed complex. Orange is working on the following areas:

- The partnership with the JAC makes it possible for telecom operators facing the same CSR issues to pool their resources. In 2025, Orange's participation in JAC's *due diligence* working groups will make it easier to identify and assess CSR risks in the supply chain by mapping suppliers based on their compliance commitment and production sites. It will also help increase supplier engagement, through targeted development programs (training sessions, working groups, and webinars);
- Orange is one of the eight JAC operators that support a program by the NGO *Save the Children* aimed at creating a lasting impact for children in mining communities and addressing child labor in artisanal cobalt mines in the Kolwezi region in the Democratic Republic of the Congo;
- Since 2017, Orange has been a member of the ILO Child Labor Platform, an initiative bringing together companies and public actors working to eradicate child labor in supply chains. One of the coalition's working groups focuses in particular on the development of a census platform for children present in artisanal mines in the Democratic Republic of the Congo and aims to ensure the monitoring of these children and their possible return to schooling or access to training.

4.2 Implementation of a due diligence plan for 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. Orange does not regard mineral supplies as a direct part of its value chain; however, the Group encourages its suppliers to ensure that they themselves do not use minerals from conflict 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 more restrictive 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."

Supplier assessments by a partner company consider the issue of non-use of minerals from conflict areas. The same applies to the on-site audits carried out by the JAC, which have a checkpoint on the procedures implemented to prevent the use of minerals from conflict areas. Non-compliance on this point triggers corrective actions and their follow-up.

4.3 Audits

4.3.1 Audits by the Joint Alliance for CSR (JAC)

Orange helps verify compliance with CSR standards through the JAC, an association of telecommunication operators (31 members as of the end of 2025, representing more than half of industry revenues worldwide). The JAC is a research platform for ecosystem solutions that responds to 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 labor exploitation. In this respect, the JAC has established dedicated working groups in order to adopt common positions and a shared methodological approach aiming to anticipate, monitor and measure

the implementation of these principles in order to respond more effectively to the new duty of vigilance regulations.

One of the JAC's missions is to audit, assess and develop the implementation of CSR standards in the production chain by the ICT industry's global suppliers. It has pooled the results of production site audits carried out by its various members since 2010. These production sites, including those of Orange's suppliers, considered to be a high CSR risk, are located in several regions of the world and at different levels of the supply chain (tiers 1, 2 and 3).

Worker protection issues are particularly important in the context of JAC audits. The 146 questions from the JAC's audit program are grouped around ten CSR topics, including those related to workers in the value chain with child and young worker labor, forced labor, health and safety, freedom of association, discrimination, disciplinary practices, working hours, wages and allowances, the environment and business ethics. Compliance with the CSR standard (SA 8000 and ISO 14001) is verified by an external audit firm specializing in CSR. Within the JAC's on-site audit campaign, some audits are conducted under the *Responsible Business Alliance* (RBA) initiative, specifically the *Validated Assessment Program* (VAP) audits. JAC recognizes the equivalence of these audits to JAC audits.

The results of these audits are taken into account in managing the suppliers with which Orange has entered into contracts. This information is retained and included in the file by the requisitioners and buyers who requested these audits for any renewal or new contract with these same suppliers, if applicable.

Following an audit, and in the event of non-compliance, a corrective action plan is proposed by the auditor with a specific resolution time. These corrective action plans are monitored and managed by the JAC to ensure that suppliers take corrective actions into account.

Nature of audits conducted throughout the 2025 JAC campaign	**2025**
On-site JAC audits	127
On-site VAP audits	24
Mobile Worker Survey	15[1]
Total audits recorded by the JAC (on-site JAC audits, on-site VAP audits, Mobile Worker Survey)	166[2]
Nature of audits conducted on sites of suppliers common to Orange	
On-site JAC audits	81
On-site VAP audits	23
Mobile Worker Survey	13[3]
Total audits recorded by the JAC (on-site JAC audits, on-site VAP audits, Mobile Worker Survey)	117
Nature of audits conducted directly by Orange	
On-site JAC audits	10
On-site VAP audits	0
Mobile Worker Survey	5
Total audits recorded by the JAC (on-site JAC audits, on-site VAP audits, Mobile Worker Survey)	15

(1) Corresponding to 12,552 employees surveyed.
(2) 60% of Tier 2, 3 and 4 suppliers are covered by these on-site audits and the Mobile Worker Survey in total.
(3) Corresponding to 12,205 employees surveyed.

The JAC's actions in 2025 led to the creation of a total of 794 corrective action plans, detailed in the following tables:

	2025	
	All 127 on-site JAC audits	o/w 81 sites of suppliers common to Orange
Human rights metrics		
Modern slavery or human trafficking	25	13
Indecent working conditions (adequate wage + excessive working hours)	173	110
Child labor	22	14
Infringement of the freedom of association and right to collective bargaining	6	3
Occupational health and safety	392	228
Discrimination	3	3
Environmental metrics	92	39
Other metrics		
Business ethics	80	21
Disciplinary measures	1	1

The results of the 127 JAC audits performed on-site in 2025 are detailed in the following table:

Score category	2025	
	All 127 on-site JAC audits	o/w 81 sites of suppliers common to Orange
Excellent	27%	32%
Good (with room for improvement)	47%	44%
Conditionally accepted	3%	3%
Poor	23%	21%

4.3.2 Customer service provider audits

Services related to Orange's customer services are subject to special monitoring. Customer services are mainly concerned with providing support to Orange customers when they express a need, by telephone, *chat* or messaging. They are mostly outsourced and, to manage its partners and ascertain the working conditions at its service providers, Orange organizes annual reviews with the management teams of the five main customer relations partners, with the participation of its customer services directors. These reviews provide an opportunity to analyze partner performance (performance indicators, country satisfaction surveys, etc.), share strategic visions, take stock of actions, and share best practices.

These partners have been selected as part of calls for tender, in part on the basis of quality of life and working conditions for their employees. The framework agreements entered into Orange's corporate CSR clause, which sets out the Group's respect for human rights requirements. Business reviews are followed up on throughout the year by the operating departments, whose project managers regularly visit sites to carry out operational monitoring of quality, processes, etc., and have many opportunities to interact with the teams. The Group entity responsible for the customer experience (CXO) also conducts on-site audits of partners, focusing on the management of all their processes and operating methods (recruitment, training, skills development, quality monitoring, etc.). Deviations from Orange's requirements are the subject of corrective improvement plans and monitoring. In addition to the Hello

Ethics whistleblowing system (see Section 4.4. *Group whistleblowing system*), these major partners have also implemented anonymous reporting procedures.

4.3.3 Enhanced safety audits for Orange suppliers in France

In France, Orange has a specific action plan for two types of subcontracting activities, identified as being particularly risky for workers of Orange subcontractors and their own subcontractors; these are subject to systematic and organized monitoring.

4.3.3.1 Network installations

The work required to set up telecom infrastructure, particularly with regard to fiber and its roll-out throughout the territory, is mainly carried out by service providers external to Orange. This work is particularly sensitive and risky for the safety of the workers performing it. A dedicated team within Orange's technical department is responsible for monitoring this activity, which includes a second party audit process (audit of external service providers). The purpose of these audits is to ensure the ability of all suppliers to meet Orange's commitments to its customers:

- By verifying that their quality, safety and environment (QSE) management system makes it possible to meet the contractually agreed requirements;
- By identifying support points, and for deviations identified in the audits, a request for systematic implementation of curative and corrective actions in order to comply with Orange's guiding principles.

This supplier auditing process was co-built with suppliers. The assessment of their processes and their QSE management system takes the form of a labeled maturity score. The OHSMS and environmental management system (EMS) benchmarks are included in the assessment grids of these audits. Building on the results of the approach undertaken in 2023, during 2024 the supplier audit program continued to include suppliers' major subcontractors, in order to have an end-to-end view of the implementation of Orange's requirements and, in particular, in 2025, it incorporated the IT security requirements (cybersecurity, GDPR) relating to the information security management system (ISMS).

Supplier audits are carried out by Orange internal resources, authorized auditors who have completed the Orange training curriculum. This audit process (method and professionalization of auditors) was validated by a reputable certification body (Afnor Compétences) and audited in 2023 by Orange's Group Audit, Control and Risk Management Department (DACRG), which consolidates this audit framework.

In addition to supplier audits, a strategy of unannounced checks has reinforced this monitoring system. The aim is that they will make up a minimum of 10% of the QHSE controls on the ground carried out by Orange. These checks are used to ensure on the ground that technicians comply with the on-site work safety rules defined by the labor code and in the contractually established safety plan. These checks apply equally to the supplier's technicians and those of their subcontractors (rank 2). Action plans are requested in the event of recurrent non-compliance and are monitored periodically during QSE reviews with these suppliers.

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4.3.3.2 Real estate work

Orange's real estate in France has a special team that carries out safety audits on sites where work is carried out by subcontractors. This team ensures regulatory compliance of Group service providers, in order to ensure secure business conditions and safe and healthy working environments. For each of its service providers, the department establishes safety plans or a health and safety organization, in accordance with the regulations. This enables it to address the risks of co-activity and the risks intrinsic to the building. Safe and healthy working environments entail:

- Controlling asbestos-related risks and monitoring materials that contain asbestos, through periodic assessment campaigns and the treatment of degraded materials, affected by works or by a hazard;
- Controlling risks related to lead in buildings by treating materials affected by works or by a hazard;
- Controlling radon risks through a radon zone declaration or a measurement and corrective actions campaign on potentially affected occupied areas;
- Ensuring the safety of roofs and terraces larger than 200m^2 by means of audits, precautionary measures and refurbishment work in case of non-compliance.

It provides training and awareness programs to its employees in charge of managing subcontracting on the safety topics of service providers, in order to ensure their skill level.

Lastly, Orange's real estate team in France ensures that regulatory compliance is respected at all of its sites where its subcontractors operate. To do this, it relies on a compliance monitoring tool, and action plans specific to each entity that bears responsibility for regulatory compliance on three topics: operation, safety and works.

4.4 Group whistleblowing system

In the early 2000s, Orange set up a whistleblowing system open to all Group employees. This system has been strengthened year after year and is now open to partners, suppliers, workers in the value chain or any external stakeholder. It was presented to the employee representative bodies before implementation and is regularly adapted to comply with the "Sapin 2," "duty of vigilance" and "Waserman" (the latter transposing into French law the European directive on protection for whistleblowers) laws.

The whistleblowing system, called Hello Ethics, can be used 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 represent a 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.

Hello Ethics can be accessed on Orange's website (www.orange.com), the Group's Intranets and via public search engines[11]; it may be supplemented by local systems of the country subsidiaries in the form of dedicated email addresses.

[11] https://helloethics-orange.integrityline.com/

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

Reports are processed according to the Group or subsidiary procedure: 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. This procedure is available on the Group Intranet and on the Hello Ethics platform.

Persons authorized to collect and process reports are required to act impartially and confidentially. Orange has a specialized team independent of the management line of the persons concerned, which carries out, at the request of management or compliance, internal investigations in the event of a justified report, suspected fraud or corruption: the investigation team, including people from the Group's General Control as needed, is small, duly authorized and subject to an enhanced obligation of confidentiality. The team conducts investigations in accordance with laws and regulations.

Orange's anti-corruption policy specifically provides for the protection of employee whistleblowers. 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 ensure that the identity of the author of the report and the information collected through the Group's whistleblowing system remain strictly confidential, in accordance with the applicable laws and regulations.

Breakdown of whistleblowing alerts by domain collected on Hello Ethics:

Alert type (all origins, excluding questions)	**2025**
Ethics violations, fraud, corruption, other violations of laws and regulations	19%
Harassment, sexism, discrimination, violence in the workplace (HSVW)	11.9%
Environment	0.6%
Human rights and fundamental freedoms	1.5%
Health and safety	1.7%
Personal data	0.2%
Customer complaints	23.3%
Human Resources	7.3%
Other	12%
Not relevant	22.5%

The year 2024 saw growth of 26% in the total number of messages received on Hello Ethics compared with 2025, i.e. 478 reports and 86 questions. It should be noted that the proportion of alerts related to the Hello Ethics scope rose to 35% (versus 31% in 2024), although the weight of messages related to customer complaints, human resources, other or irrelevant remained significant at 65%.

In the UK, Orange Brand Services Limited and Orange Cyberdefense UK operate a 'Speak Up' policy providing guidelines on the disclosure of information at work relating to suspected wrongdoing, such

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as misconduct or alleged dishonest or illegal activity, 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 organization called Protect[12].

5 OUTREACH, TRAINING AND SHARING OF BEST PRACTICES

5.1 Internal training

5.1.1 Appropriation of the Group's CSR challenges and commitments by all employees

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

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 four categories: Environment, Diversity and Inclusion, Ethics and Compliance and Responsible Practices.

General CSR awareness training

To enable all Orange employees to take ownership of CSR issues and Orange's commitments in this area, numerous training courses are available online, in seven languages as regards the essentials, covering a wide range of topics: Orange's carbon footprint, gender equality in the workplace, the duty of vigilance, digital accessibility, the circular economy, ethics and compliance, sustainable business models, etc.

5.1.2 Further training specific to the businesses

The CSR "business" training portfolio helps incorporate CSR skills into the business approaches to empower all employees to take action in their activity.

It includes, for example, training for the financial management professions, which have a key role to play in the reporting and management of non-financial trajectories, training on eco-design for the teams who design products and services, software eco-design training for IT architects, developers and integrators to build more energy-efficient solutions, responsible purchasing training for buyers and requisitioners to learn about the CSR criteria to be applied in any purchasing process, and training on innovative and sustainable business models for marketing functions to make sustainable development a real driver of value creation.

[12] See https://protect-advice.org.uk/.

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Special attention is also given to the training of senior managers.

5.1.3 CSR training for buyers

Orange ensures that buyers are acculturated to CSR through various training programs. In France, the "CSR and Responsible Purchasing" training was updated in 2025 and was the subject of two sessions in 2025. These components supplemented existing training courses: "Finance & performance, a committed CSR player" and "Learning the essentials of responsible purchasing at Orange."

5.2 External training

5.2.1 Supporting supplier upskilling

The issues relating to purchases linked to Orange's activities within the Africa & Middle East zone are the subject of particular attention because these purchases are mainly indirect purchases, among which categories of purchases are at significant risk in terms of health, safety and working conditions, as well as in terms of adequate wages: network and construction work, security and maintenance. In 2024, Orange organized several training and awareness sessions for its employees, particularly buyers, as well as for its high-risk suppliers. A human rights awareness session was organized with the United Nations Global Compact involving local Orange suppliers considered to be high risk. In addition, a module dedicated to human rights issues in the supply chain has been integrated into the *Leader of Sustainable Change in Africa & the Middle East* training program aimed at CSR managers from 17 countries in the Africa & Middle East region. In 2026, Orange plans to continue to take greater account of social dimensions in its specific CSR training for buyers in the Africa & Middle East region and also to continue to raise suppliers' awareness, mainly at local supplier forums.

In addition, Orange expects its service providers to ensure the safety and training of their own employees, for example, when working at antenna sites. Orange does not conduct systematic audits of these systems, but does ensure, through the contractual framework and supplier dialogue, that its partners apply practices that comply with the Group's health and safety policy and with local regulations.

5.2.2 Supplier forum

The Supplier Forum brings together many Orange partners every year. One of its objectives is to raise awareness among the latter of various topics and in particular of CSR. The 10th edition of the Supplier Forum took place in June 2025 and gave the Group's Executive Director of Social and Environmental Responsibility an opportunity to speak and to present to more than 500 strategic and critical suppliers her vision of the objectives to be achieved and the concrete CSR actions to be taken. Notable cooperation projects undertaken by Orange were shared, including Orange's cooperation with its peers through the JAC, which is actively engaged in work related to respect for human rights.

5.2.3 Hello Women program

Established in 2020 in response to the lack of gender balance and the failure to promote careers for women in technical and digital roles, the *Hello Women* program continues to bear fruit. In Africa & Middle East, new concrete actions were carried out in 2024 and 2025, particularly in Madagascar, where nearly 1,000 female high school and university students benefited from awareness-raising

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sessions, training courses or mentorships. In Liberia, 250 young girls were trained for technical and digital roles. In Morocco, in partnership with Wagon Casablanca, the program was strengthened through women-only tech *bootcamps* for data science. This program will continue to be rolled out in the coming years.

5.2.4 Education assistance

Digital technology in schools promotes access to education for those without it, especially children who are not in a positive environment for learning. The objective is to reduce the number of children who drop out of school by offering them the opportunity to develop their potential and find their way. By relying on associations, and in partnership with the local education departments, Orange develops the digital skills of students and teachers, in a secure and ethical framework and by offering innovative educational content and tools that are accessible without an Internet connection because they are integrated into digital media (tablets or smartphones). Many programs have been developed to this end by Orange subsidiaries and foundations, such as the Digital Schools program, rolled out in 16 Africa & Middle East countries, which enables 600,000 students in 1,700 beneficiary schools to access a substantial amount of free educational content by right, with the material provided in the kits. A partnership with the UN Refugee Agency (UNHCR) has made it possible to extend this program to populations of young refugees, including in Moldova in 2024 and 2025. In addition to training students, Orange subsidiaries and foundations also help train teachers on the use of digital resources. In 2024, the Orange Polska Foundation secured regional and European funding to train teachers on the use of digital educational resources over the next few years in ten regions of Poland.

Finally, the new Orange Foundation program entitled *Apprendre Autrement* (another way to learn) is aimed at young people experiencing exclusion. It seeks to mobilize them through a concrete project that combines digital technology and self-confidence and is intended to help bring back the joy of learning.

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6 ASSESSMENT OF THE EFFECTIVENESS OF MEASURES TO PREVENT MODERN SLAVERY, FORCED LABOR, AND CHILD LABOR

2025 Table of Monitoring and Internal Control Indicators for Potential Violations of Human Rights and Fundamental Freedoms :

Risk	Governance	Indicator	2025	2024	2023
Human rights cluster					
1. Modern slavery or human trafficking within the framework of a known established contractual relationship	GCSERC, Executive Committee, CSR/Procurement Steering Committee	Number of action plans in the area handled by the Joint Alliance for CSR	25	26	31
2. Indecent working conditions at suppliers' and subcontractors' premises: compensation that does not allow an adequate standard of living, right to rest, etc.	GCSERC, Executive Committee, CSR/Procurement Steering Committee	Number of action plans in the area handled by the Joint Alliance for CSR	173	193	243
3. Infringement of a child's right to harmonious education and development: prohibition of child labor	GCSERC, Executive Committee, CSR/Procurement Steering Committee	Number of action plans in the area handled by the Joint Alliance for CSR	22	13	21
4. Infringement of freedom of association and the right to collective bargaining on working conditions	GCSERC, Executive Committee, CSR/Procurement Steering Committee	Number of action plans in the area handled by the Joint Alliance for CSR	6	8	21
5. Any act of discrimination: recruitment, work, salary, diversity, unfair procedures	GCSERC, Executive Committee, CSR/Procurement Steering Committee	Number of action plans in the area handled by the Joint Alliance for CSR	3	9	10

In Australia, the supply chain consists of suppliers involved in hardware and software manufacturing, IT procurement and utility and maintenance services which may pose a risk of modern slavery. Orange Australia has created a modern slavery risk profile of its suppliers and assessed their compliance with the Australian Modern Slavery Act. In 2025, Orange Australia reviewed the high risk suppliers identified in the modern slavery risk profile.

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In order 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 Ltd 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.

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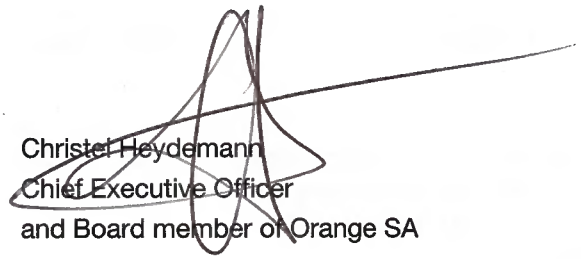
This statement is published in accordance with Section 54 (1) of the UK Modern Slavery Act 2015 and Section 13 of the Australian Modern Slavery Act 2018. It was approved by the Orange SA Board of Directors' Meeting of February 18, 2026.

It is drafted in French and English.



Christel Heydemann
Chief Executive Officer
and Board member of Orange SA

Orange Restricted