

This statement outlines the measures taken during the fiscal year ended December 31, 2022 to combat all forms of slavery and human trafficking. It applies to the business activities of Orange SA and its subsidiaries, particularly Globecast UK Limited, Orange Brand Services Limited, Orange Business Services Australia Pty Ltd., Orange Cyberdefense UK Ltd and Orange Business Holdings UK Limited (hereinafter referred to collectively as "Orange"), and their relationships with suppliers.

Orange is a group that includes Orange SA – the parent company, which is a French public limited company (Société Anonyme) based in France, and subsidiaries and shareholdings providing consumer telecommunications services in 26 countries mainly in Europe, Africa and the Middle East. Orange is one of the world's leading telecommunication operators, with revenue of 43.5 billion euros in 2022 and 136,000 employees worldwide at December 31, 2022, including 75,000 in France. Orange had a total of 287 million customers worldwide at December 31, 2022, including 242 million mobile customers and 24 million broadband customers.

Orange is also a leading provider of global IT and telecommunication services to multinational companies, under the brand Orange Business Services. The company has around 58,100 suppliers and subcontractors all over the world, primarily in Europe, Asia and Africa.

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

This statement forms part of Orange's new Lead the Future strategic plan and its corporate purpose. Presented in February 2023, this strategic plan is supported by the implementation of a new business model, based on the objectives of performance, excellence and trust, with environmental, social and governance challenges at its heart. The Group's commitment is reflected in the Sustainable Development Goals (SDGs) set by the United Nations Member States. Orange has also created the following purpose: "As a trusted partner, Orange gives everyone the keys to a responsible digital world. Our mission is to ensure that digital services are well thought-out, made available and used in a more caring, inclusive, and sustainable way in all areas of our business. Orange does everything in its power to ensure that people and organizations enjoy a more autonomous and secure digital life. Through the engagement and expertise of the Group's teams, Orange employs innovative technologies and services everywhere, and for everyone." This purpose was approved by Orange's Shareholders' Meeting on May 17, 2020 and is included in Orange's Bylaws.

The Orange group's Raison d'agir Committee was established in November 2021 and is composed of eight qualified experts from outside the Group and two members of the Executive Committee. Its role is to make recommendations on the implementation of Orange's corporate purpose. It also considers whether Orange's strategy and its implementation are properly aligned with its corporate purpose, in particular through the use of monitoring indicators.

This advisory body met three times in 2022 and provides its support to corporate management. Seven members of the Executive Committee and experts from several departments attended the Committee's meetings. It serves as a constructive forum to help the Group ensure that its Purpose will be an effective lever for lasting transformation.

The Committee recommends that Orange use its voice as an international company involved in social issues to promote responsible digital technology as affirmed in its purpose commitments.

In 2022, discussions with the Committee produced the following specific recommendations in particular for the Trust pillar:

- structure the Group's actions on human rights and fundamental freedoms;
- clarify Orange's child protection responsibilities and consider the impact of the action plans implemented; help develop concrete solutions for child protection enforcement;
- take inspiration from the Purpose to instill a shared culture of responsibility in all Group departments.

The recommendations made in February and June were presented to the Ethics and Sustainable Performance Committee (ESPC) and the Governance and Corporate Social and Environmental Responsibility Committee (GCSERC) in July 2022. The members of the Raison d'agir Committee had the opportunity to speak with management in January 2023 about the long-term ambitions of the 2030 strategy, to enable Orange to incorporate their positions.

In line with these discussions,

- Orange analyzed the roll-out of its child protection policy as part of the "Better Internet for Kids" program in the countries in which it operates, in order to redefine it on a common foundation, explore new themes, and accelerate stakeholder dialog and information campaigns;
- Orange launched a mission to clarify its evolving human rights challenges and propose human rights governance to address them;
- Orange has launched a survey and workshops with managers (survey and workshops) in an effort to better incorporate the Purpose into the businesses.

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

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

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

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

The CSR & Procurement Steering Committee, made up of representatives from the Group CSR and Purchasing Department, meets at least once a year. It oversees the implementation of the policy for all subsidiaries; it verifies that:

- the commitments defined in Orange's "Commitments to responsible purchasing" are effectively formalized, via the CSR clause and the Supplier Code of Conduct (Group and local suppliers);
- the CSR culture is alive, thanks to mandatory CSR training sessions for buyers;
- CSR risk management, based on supplier assessments and audits, is effective.

Stakeholder dialog

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

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

It involves consultation with pre-identified internal and external stakeholders on the topics addressed in the Orange group's CSR challenges. The questioning used provides for a semi-quantitative rating system as a way of prioritizing stakeholders' concerns and expectations. Stakeholder Dialog incorporates an element of subjectivity, which is inherent to any consultation, into the responses received. It is an open exercise based on both real facts and perceptions.

In 2022, Orange continued its "Responsible together in a post-Covid digital world" dialogs in Madagascar, Botswana and Romania. This dialog was launched in 2020 and incorporates the strategic plan's CSR commitment pillars, as well as the notions of freedom of expression, data protection and work organization. It is expected to be rolled out across all of the Group's geographies over the next two years.

In France, data sheets on each theme (environment, data security, education and digital technology, connected territories, connected health, work organization, etc.) provide a detailed analysis of the results of these dialogs, acting as a source of inspiration for Orange experts. They were supplemented in 2022 by data sheets created for three challenges common to all countries: digital technology and education, digital technology and data protection, and digital technology and local economy.

A Group "Let's Talk About the Duty of Vigilance" dialog was launched in 2022 to understand the perspective of internal and external stakeholders, with a view to influencing the selection of priorities and action plans to be implemented as part of the Duty of Vigilance. Through this dialog, Orange sought to improve the quality of the probability analysis in managing risks linked to the Duty of Vigilance, and to better understand the expectations of stakeholders internally and the specific challenges facing the entities, as well as any potential obstacles to implementing the action plans. Discussions on this topic continued between Orange and the UNI Global Union.

The results of the "Let's Talk About the Duty of Vigilance" dialog highlighted employees' concerns about downsizing and social risks in France post-Covid. External stakeholders (both national and international) have high expectations for the protection of user data and have asked Orange to take action on sensitive topics such as modern slavery and child labor. Lastly, internal and external stakeholders identified two environmental topics as risks Orange has not properly addressed: recycling (particularly in the MEA region) and measures aimed at fighting global warming.

1. Policies implemented by Orange to combat modern slavery and human trafficking

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

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

Orange's commitments

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

- Orange was one of the first companies to sign the **United Nations Global Compact in 2000, and it signed it again in 2022**, thus affirming its commitment to respecting and promoting fundamental human rights in its activities and within its sphere of influence.
- Respect for the fundamental principles set out in the Universal Declaration of Human Rights and by the International Labour Organization also explicitly features in the **Group's Code of Ethics**^{1*}. This document sets out the Group's principles of action with regard to its customers, shareholders, employees, suppliers, and competitors, as well as all other stakeholders in the countries where the Group operates.
- In 2006, Orange strengthened its commitment by signing a **global agreement with the UNI Global Union**. Through this agreement, Orange reaffirmed its commitment to respect fundamental human rights, both internally and in its relations with its suppliers and subcontractors.
- Orange also published a **report entitled "Orange and Human Rights"**^{2*} for 2016, prepared according to the United Nations Guiding Principles on Business and Human Rights, in line with the expectations of stakeholders. With respect to human rights issues, this document presents the Group's approach, its awareness-raising tools and internal procedures ensuring both the implementation of commitments in all entities and the dialog processes with stakeholders.
- Orange also takes part in the ILO platform on child labor, which returned its work in June 2021.
- As a signatory to the United Nations Guiding Principles, Orange contributed to discussions as part of the UN Working Group on Business and Human Rights (UN BHRWG) on the new framework ("UNGPs 10+") to be put in place after ten years of applying the Guiding Principles. Orange shares the United Nations' analysis on the effective implementation of the Principle of "protection of human rights" by public authorities and the Principle of "respect for human rights" by companies. Orange proposes to set up an analysis of the sharing of responsibility between public authorities and companies prior to the implementation of a Principle of "reparation" yet to be developed.

The Group is also **subject to French Law no. 2017-399 of March 27, 2017 on the duty of vigilance of parent companies and ordering companies** (hereinafter: the "law on the duty of vigilance"), whose scope is broader than that of the UK Modern Slavery Act and Australian Modern Slavery Act 2018. This law draws on the Guiding Principles of the United Nations and Organisation for Economic Co-operation and Development (OECD) aimed at multinational companies. It requires the implementation of reasonable vigilance measures that help identify risks and prevent and mitigate serious violations related to the health and safety of persons, the environment, and human rights and fundamental freedoms (including combating modern slavery). On the one hand, its scope extends to risks and violations that may result from the activities of the Group, its subsidiaries, or the companies it controls. On the other, it also encompasses the activities of its subcontractors or suppliers with which it maintains an established business relationship, and therefore to its supply chain. These measures are outlined in **Orange's 2023 Vigilance Plan**, which will be posted on the Orange website before the Annual Shareholders' Meeting scheduled for May 23, 2023^{3*}.

In addition, Orange has been strongly committed to promoting freedom of expression and respect for privacy in the ICT sector as part of the **Global Network Initiative**^{4*}.

^{1*} The Group's Code of Ethics is available online at:

https://www.orange.com/sites/orange.com/files/documents/2020-09/CHARTE-DE-DEONTOLOGIE_03-10_VA.pdf

^{2*} The "Orange and Human Rights" report is available online at: <https://gallery.orange.com/rse#om=da20cfac-4efe-4729-b40f-26ff322dc883&v=1316e83f-0435-46fb-820d-e6742ede68e7>

^{3*} Orange's 2023 Vigilance Plan will be available online at: [CSR media library \(orange.com\)](#)

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

Orange works to promote human rights and fundamental freedoms and defends their values, particularly with regard to the responsibility it intends to assume in respect of its supply chain. Orange actively respects human rights in its sphere of influence through the following collective initiatives:

- by promoting an open dialog with suppliers, employee representatives and the authorities during the human rights due diligence processes initiated by companies, through its participation in the GNI 2022 Annual Learning Forum and in a roundtable for the Danish Institute for Human Rights;
- with an appeal for a just transition to an audience of European industrials during its presentation at CSR Europe's Leader Hub;
- by demonstrating the impact of the duty of vigilance for multinational corporations present in Africa, at a symposium organized by the French Council of Investors in Africa (CIAN) and Affectio Mutandi;
- as part of the Joint Alliance for CSR (JAC), a human rights working group was created in 2021. In 2022, its work was focused on four themes: forced labor, child labor, decent wages and conflict minerals.
- Orange has undertaken an initiative to share good practices between companies on these issues through its participation in the French association, *Entreprises pour les Droits de l'Homme* (Businesses for Human Rights – EDH). In 2022, Orange participated in the work on the implications of banning imports of products made by forced labor and on whistleblowing and whistleblower protection mechanisms. In this context, Orange presented its approach of involving stakeholders in vigilance approaches.

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

Orange's internal policies

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

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

Social Domain

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

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

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

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

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

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

Responsible purchasing policy

For several years now, Orange has implemented **a responsible purchasing policy**⁵ that embeds CSR in its relationships with suppliers and subcontractors and improves the management of employee-related, social and environmental risks.

The Global Procurement & Supply chain (GPS) Department, within the Group Finance & Performance Department, ensures the roll-out of this policy within the Group, with each entity or subsidiary having its own Purchasing Department. A significant part of Orange's purchases is made following the negotiation of framework agreements by BuyIn, the purchasing alliance of Orange and Deutsche Telekom, which also applies these principles.

In this context, the duties of the GPS Department are, on the one hand, to promote the understanding of CSR commitments by the various purchasing stakeholders and their application in the business processes concerned and, on the other hand, to ensure the proper roll-out of measures relating to the application of the law on the duty of vigilance with respect to suppliers. A key event for dialog with suppliers and specifiers is organized annually during the "Supplier CSR Forum."

Orange's responsible purchasing policy, available at gallery.orange.com/RSE, specifically requires the various Group entities to control CSR risks and opportunities related to purchasing and the supply chain, in particular by requiring Group suppliers to adhere to a Code of Conduct and to comply with laws and regulations.

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

- The relationship with national and international law: the supplier must comply with applicable laws, regulatory provisions and contractual obligations. This includes the US Foreign Corrupt Practices Act and the UK Bribery Act where applicable. The Supplier must otherwise comply with any international trade sanctions (including embargoes); this includes any sanctions which may be in effect as a result of a resolution adopted under Chapter VII of the Charter of the United Nations by the UN Security Council, as well as any sanctions that may have been imposed by the European Union. The Supplier must ensure that its contractors and/or subcontractors comply with the Principles of the Supplier Code of Conduct insofar as they are involved in the supply of products or services under the Contract;
- Respect for human rights as defined at the international level. The Contractor must not be complicit in any violation of human rights whatsoever and must respect the dignity of people, privacy and the rights of each individual. Slavery in all its forms is prohibited. Furthermore, the Supplier will do its best to comply with all the standards drafted by the International Labour Organization (ILO);
- Best social responsibility practices and compliance with social legislation;
- Freedom of association and the right to collective bargaining. The Supplier must endeavor to implement internationally recognized standards, for example the conventions of the ILO, without violating national law. It must ensure that its employees and representatives, including temporary (staffing agency) workers, can speak openly within their company regarding any issue relating to their working conditions;

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

- Prohibition of child labor: child labor is strictly prohibited. "Child labor" corresponds to the definition provided in the International Labour Organization International Programme on the Elimination of Child Labour (ILO-IPEC) and "Article 32 of the United Nations Convention on the Rights of the Child (UNCRC)." If it is discovered that a child is working on the Supplier's premises, the Supplier must immediately take steps to remedy the situation in order to serve the best interests of the child.

Orange's responsible purchasing policy is based on the systematic incorporation of a CSR clause in the Group's framework agreements as well as, in exclusively local contracts, a clause that references Orange's Supplier Code of Conduct in the appendices to these contracts. This Code of Conduct describes, in particular, the ethics, employee-related and environmental commitments expected by the Group. Orange thus requires that its partners, suppliers and their own subcontractors i) respect all national, European and international rules in connection with the standards of ethical and responsible behavior; this includes, but is not limited to, standards dealing with human rights, occupational health and safety conditions, environmental protection, sustainable development, the fight against corruption and child protection; ii) adopt and apply the ethical standards and commitments of the Group and make progress in these areas.

OBS Australia has revised its standard purchase agreement so that new suppliers are required to comply with Australian Modern Slavery Act 2018 and when requested, provide information on the measures and controls implemented to ensure compliance. In 2022, OBS Australia started incorporating clause on compliance with Moderns Slavery Act into agreements with existing suppliers and will continue with this exercise in 2023 also.

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

The Responsible Purchasing Steering Committee oversees the implementation of the policy for all subsidiaries; at least once a year, it brings together representatives of the Internal Control, Legal, Purchasing and CSR departments. It verifies that:

- the commitments defined in Orange's "Commitments to responsible purchasing" are effectively formalized, via the CSR clause and the Supplier Code of Conduct (Group and local suppliers);
- the CSR culture is alive, thanks to mandatory CSR training sessions for buyers;
- CSR risk management, based on supplier assessments and audits, is effective.

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

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

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

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

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

Human rights impact assessments and remediation

Since 2012, through Verisk Maplecroft⁶, a specialist external firm using a methodology based on United Nations and OECD standards, Orange has prepared a customized assessment of the risk incurred in terms of respect for human rights in each of the countries where Orange is an operator. Orange determines more precisely the criteria corresponding to its assessment of the human rights risks incurred as a result of its activities and geographies. As such, 14 dimensions of human rights are considered in the form of risk criticality indexes to provide an aggregate rating, country by country. These dimensions were redefined in 2022 to ensure balanced coverage of the three areas, namely:

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

The 2022 human rights impact assessment carried out for the entire Orange operator scope, using scores assigned by specialist firm Verisk Maplecroft to the three areas of democracy, workers' rights and business climate, showed that two countries in which Orange is present require sustained attention in terms of respect for human rights and fundamental freedoms. These countries are the Democratic Republic of the Congo and the Central African Republic. In total, 432 people are directly employed by Orange in these two countries to serve more than 14.3 million customers. Fourteen other countries in the Africa & Middle East region are assessed by the firm as also requiring special attention in terms of human rights and fundamental freedoms. A total of 13,438 people are directly employed by Orange in these countries⁷ to serve more than 130.6 million customers.

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

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

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

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

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

⁶ <https://www.maplecroft.com/>

⁷ Only entities consolidated by Orange have been included in the calculation of the number of employees and customers

- Violation of freedom of expression (in civil society)
- Violation of privacy

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

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

Serious violations of human rights and fundamental freedoms cluster			2020	2021	2022
1. Modern slavery or human trafficking within the framework of a known established contractual relationship	GCSERC, ESPC, CSR/Procurement Steering Committee	Number of action plans in the areas handled by the JAC ⁽³⁾	5	17	20
2. Non-decent working conditions at suppliers' and subcontractors' premises: compensation that does not allow an adequate standard of living, right to rest, etc.	GCSERC, ESPC, CSR/Procurement Steering Committee	Number of action plans in the areas handled by the JAC ⁽³⁾	118	133	167
3. Infringement of a child's right to harmonious education and development: prohibition of child labor, protection against content unsuitable for a young audience	GCSERC, ESPC, CSR/Procurement Steering Committee	Number of action plans in the areas handled by the JAC ⁽³⁾	3	5	14
4. Infringement of freedom of association and the right to collective bargaining on working conditions	GCSERC, ESPC, CSR/Procurement Steering Committee	Number of action plans in the areas handled by the JAC ⁽³⁾	2	6	6
5. Any act of discrimination: recruitment, work, salary, diversity, unfair procedures	GCSERC, ESPC, CSR/Procurement Steering Committee	Number of action plans in the areas handled by the JAC ⁽³⁾	1	1	9
6. Violation of freedom of expression (in civil society)	GCSERC, ESPC, CSR Department	Number of service interruption requests received from authorities	1	4	10

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

Orange Australia is creating a modern slavery risk profile of its suppliers and evaluating its supplier's compliance with the requirements of the Australian Modern Slavery Act and in this regard sought a copy of the modern slavery statement from its major suppliers in order to ascertain their compliance with the Australian Modern Slavery Act.

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

Actions with suppliers

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

Suppliers and subcontractors are assessed at several points in the contractual relationship, using several tools provided to the Group's entities. The assessment is based on a categorization of suppliers and subcontractors at CSR risk, in order to prioritize actions to mitigate non-financial risks in the Group's supply chain. The criteria used for this categorization cover respect for human

rights, including working conditions, forced labor and child labor; health and safety, environmental consideration, and the traceability of minerals from supply sources that respect human rights and the environment.

BuyIn chose to use Ecovadis for all its audits. This provider offers a tool for assessing suppliers' CSR commitment based on the ISO 26000 standard.

Achieving a minimum score of 25/100 in one of the various assessments is recommended to be able to enter into a contract with Orange. Corrective action plans must be implemented for prospects or suppliers scoring less than 45/100.

The GPS department maintains an annual record of the assessments carried out in the various entities.

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

This initiative involves assessing the CSR maturity of suppliers in the high and very high CSR risk categories with a significant annual order value.

Further work on the evaluation process was initiated in 2021 and completed in 2022. Thanks to the feedback from implementation in previous years, from the GPS department and their liaison officers in the subsidiaries, operational clarifications have been made to the procedure in order to better support the subsidiaries responsible for these assessments, with a dual objective:

- help the subsidiaries achieve operational compliance;
- give subsidiaries the possibility, when the efficiency of the process is not affected, to adapt certain operations locally by choosing from a list of proposed solutions whose methodology is based on international CSR standards and guidelines, such as the Global Compact, ISO 26000, ILO and GRI.

In this context, 554 current and/or potential Orange suppliers were assessed in 2022 by an external service provider, including 92 at BuyIn's initiative and 42 at Purchasing France's initiative. The suppliers identified as needing to improve their CSR performance were asked for corrective action plans.

In addition, specific additional questionnaires may be sent out for certain Orange CSR requirements during the bidding process, particularly in France.

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

Orange Australia is in the middle of an exercise of seeking information and assessing its Suppliers through a questionnaire in order to ascertain the applicability of and their compliance with Modern Slavery Act.

In 2023, Orange Australia will conclude the exercise of review and assessment of its supply chain in Australia for modern slavery risks.

Orange Brand Services Limited has developed its own onboarding process, and maintains a database of suppliers containing their details, country and Purchase Order Data (including what commodity or service is being purchased). The company is responsible for its own due diligence and risk assessment of its circa 210 suppliers and, to date, its fraud and compliance (anti-corruption and sanctions) due diligence does not consider there to be a modern slavery risk that requires separate or more detailed assessment of suppliers in the context of modern slavery. However, its onboarding process can be developed to incorporate such due diligence should future risk assessments identify a need for it (the supplier database could be used as the basis for establishing the level of risk relating to modern slavery (i.e., country risk by commodity/service risk)) and this is under consideration in 2023.

Respect for human rights in conflict zones

Orange recognizes the legitimacy of concerns about sourcing materials from regions plagued by political and social conflict and is 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 ensures that its main suppliers have performed due diligence to avoid using minerals that may directly or indirectly finance armed groups. As such, Orange contractually requires its suppliers to ensure that they themselves do not use minerals from these areas through three different levers, namely: the Supplier Code of Conduct, which is appended to all purchasing contracts; the equipment-specific CSR annex, which is of a more restrictive nature and is appended to all equipment purchasing contracts; and lastly the CSR clause appearing in purchasing contracts, which involves suppliers signing "Orange's Responsible Purchasing Commitments."

Orange relies on the adherence of its main electrical and electronic equipment suppliers to the Responsible Business Alliance (RBA8) Code of Conduct, which includes a commitment to "policy and due diligence on the sourcing and traceability of tantalum, tin, tungsten and gold in the products they manufacture in order to provide reasonable assurance that they are sourced in a manner consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, or an equivalent and recognized due diligence framework."

Of the Orange group's top 100 suppliers in 2022, there were 16 equipment manufacturers potentially affected by the presence of materials that might have originated from conflict areas. Of these 16 suppliers, 14 are signatories to the RBA or the Responsible Minerals Initiative (RMI). Only two suppliers, representing low purchase amounts (less than 3% of equipment expenditure), have not made this policy and due diligence commitment regarding the sourcing and traceability of minerals from conflict and high-risk areas.

In addition, supplier assessments by EcoVadis consider the issue of non-use of minerals from conflict areas. The same applies to the audits carried out by the JAC, especially those carried out on site, which have a checkpoint on the procedure to ensure the traceability of minerals. Non-compliance on this point triggers corrective actions and their follow-up.

Audits conducted by the JAC

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

The **JAC** (Joint Alliance for CSR) is an organization that was created in January 2010 at the initiative of Orange, Deutsche Telekom, and Telecom Italia. As of the end of 2022, it includes 27 telecommunication operators around the world, compared to 18 at the end of 2021. The significant change in the number of JAC members is due primarily to the effectiveness of the audit results pooling program implemented since 2010 for more than 590 high-CSR-risk production sites in 45 countries and at different levels of the supply chain (tiers 1, 2 and 3). These results are taken into account in the selection of suppliers within the various Orange group entities, including BuyIn.

Thanks to the JAC, members are not alone in managing the new sustainability challenges affecting the entire supply chain, such as climate change, the implementation of circular economy principles, and the fight against new forms of human rights violations and 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 meet the new due diligence regulations.

The JAC's member operators pool their resources in order to promote CSR principles to suppliers in the sector, based on a shared reference framework which includes guidelines and a shared audit methodology. These audits assess suppliers'

⁸ RBA, formerly known as the Electronic Industry Citizenship Coalition (EICC).

compliance with social and environmental accountability standards (SA 8000, ISO 14001) and, where necessary, provide the groundwork for implementing corrective action plans.

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

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

In 2022, the JAC conducted 98 audits, including 68 on-site audits carried out directly by the JAC, 11 using the Validated Assessment Program (VAP) standard, and 4 via the JAC remote protocol. The JAC also carried out 15 anonymous surveys of workers over the phone, specifically about their working conditions. These actions made it possible to reach the level of tier-two and tier-three suppliers (66% of audits and investigations).

The JAC's actions in 2022 led to the development of 549 corrective action plans, of which 42% concerned conditions related to occupational health and safety, 12% excessive working hours, 19% the environment, 10% compliance with ethics standards, 9% wages, 1% discrimination, 3% failure to comply with standards for child workers, 2% forced labor, 1% non-compliant disciplinary practices, and 1% lack of unions. The audits concerned more than 133,000 employees (64% through the JAC audits, 2% through the JAC remote protocol audits, 19% through the VAP audits, and 15% through anonymous surveys of employees over the phone). In 2022, 224 action plans were completed.

Since 2010, the JAC has conducted a total of 910 audits in 47 countries (84% of the audited production facilities are located in Asia), improving the working conditions of around 1.5 million employees.

The on-site audits were conducted in 2022 in the following 17 countries and regions: Bangladesh, Brazil, Cambodia, China, Italy, India, Mexico, Nigeria, Poland, Romania, Russia, South Africa, Sweden, Taiwan, Tunisia, the USA and Vietnam. Most of the audits (around 76%) were done in Asia, followed by Europe (11%), Latin America (7%), Oceania (5%) and Africa (1%).

Between 2010 and 2022, the members of the JAC found 5,718 incidents of non-compliance with the CSR standards and closed 5,363 cases with corrective action plans covering:

- Occupational health and safety (43%)
- Number of hours worked (14%)
- Lack of environmental measures (13%)
- Child labor (3%)
- Discrimination (4%)
- Compensation (7%)
- Business ethics (12%)
- Forced labor (2%)

For example, for these incidents of non-compliance (137) regarding forced labor, the auditors found cases where employees could not freely terminate their employment contracts, unjustified withholding of wages, restrictions on freedom of movement, use of surveillance cameras for disciplinary purposes without notifying employees in advance, many cases where workers did not receive their signed employment contract or work card, and employment contracts with trial periods that were much longer than those stipulated by regulations.

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

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

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

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

In 2022, work groups were focused on four themes: forced labor, child labor, decent wages, and conflict minerals.

4. Whistleblowing and reporting system

A Group whistleblowing system, via the "Hello Ethics" web platform, has been instituted and covers violations related to corruption, the environment, human rights, and fundamental freedoms, as well as personal health and safety.

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

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

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

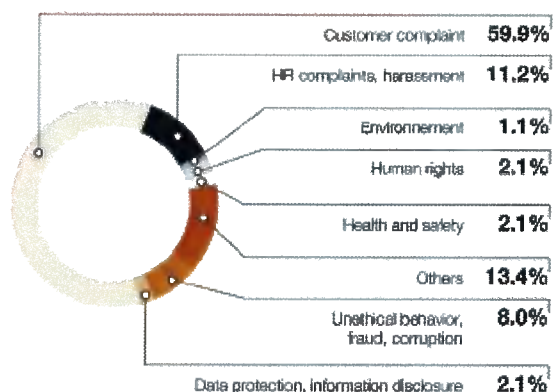
Reports are processed according to the procedure laid down by the Group or its subsidiaries: acknowledgment of receipt, review of the admissibility of the report and processing by teams authorized according to the area, while respecting the confidentiality of the whistleblower and the people concerned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

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

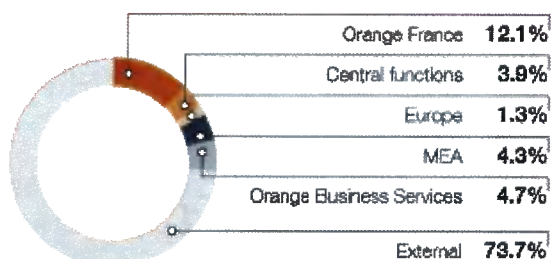
As well as having access to the Group whistleblowing systems, in the UK, Orange Brand Services Limited operates a 'Speak Up' policy (formerly the Whistleblowing policy) providing guidelines on the disclosure of information relating to suspected wrongdoing, such as misconduct or alleged dishonest or illegal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

The results for 2022 are as follows:

Distribution of alerts by entity



Distribution of alerts by field



5. Outreach, training and sharing of best practices

Employees

Backed by its membership in the *Entreprises pour les droits de l'homme* (Businesses for Human Rights – EDH) association, an organization grouping together some of the largest French companies, Orange has been rolling out an **e-learning training called “human rights in companies,”** available in 90% of the countries in which the Group operates, in order to disseminate its main principles among its employees. E-learning, which is available in English, French and Polish, enables employees to identify the human rights issues at stake in their day-to-day activities, as well as the most high-risk areas and activities, and to learn how to respond.

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

In 2020, Orange rolled out a **CSR certificate** for all Group employees. The certificate program raises awareness of CSR principles and the themes of the Engage 2025 Strategy, specifically digital inclusion and the environment. These themes tie in

with human rights, environmental and sustainable development risks. The certificate program first became available in French and English, and Polish and Spanish versions were introduced in the first quarter of 2022. An Arabic version is currently being considered.

In addition, Orange raises the awareness of its employees with regard to diversity and inclusion, thanks in particular to the coordination of the community of diversity players and to communication campaigns organized for international days devoted to specific causes (women's rights, elimination of violence against women, people with disabilities, combating homophobia, etc.).

The Group trains its employees in inclusive management and well-being at work and, in 2021, rolled out a Vivre ensemble la diversité module ("Diversity Together" outside France), in various countries with close to 5,800 employees registered. Since 2018, employees' awareness of gender equality in the workplace has been raised via an online training program providing a "professional equality certificate," which has been obtained by nearly 44,000 employees in France. An international certificate course was launched in April 2021. Available in five languages since 2022, it has already been taken by close to 23,000 employees across the world.

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

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

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

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

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

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

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

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

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

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

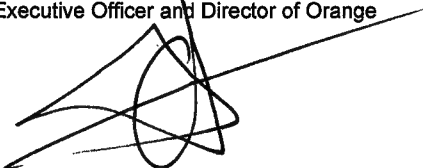
Holdings UK Limited, that are covered by this statement, and discussed the requirements of the Modern Slavery Act and the steps that need to be taken to mitigate modern slavery risks.

This statement is published in accordance with Section 54 (1) of the UK Modern Slavery Act and Section 13 of the Australian Modern Slavery Act 2018. It was approved by the Orange SA Board of Directors' Meeting of February 15, 2023.

It is drafted in French and English.

Christel Heydemann

Chief Executive Officer and Director of Orange

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.