



Human Rights Group Policy



March 2024

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Introduction



About Orange

Orange is one of the world's main telecommunication operators and is also a leading provider of global IT and telecommunication services to companies, under the brand Orange Business.



Present in **26 countries** under the Orange brand and in 65 countries for its BtoB activities



44.1 billion euros of revenue as of the end of 2023



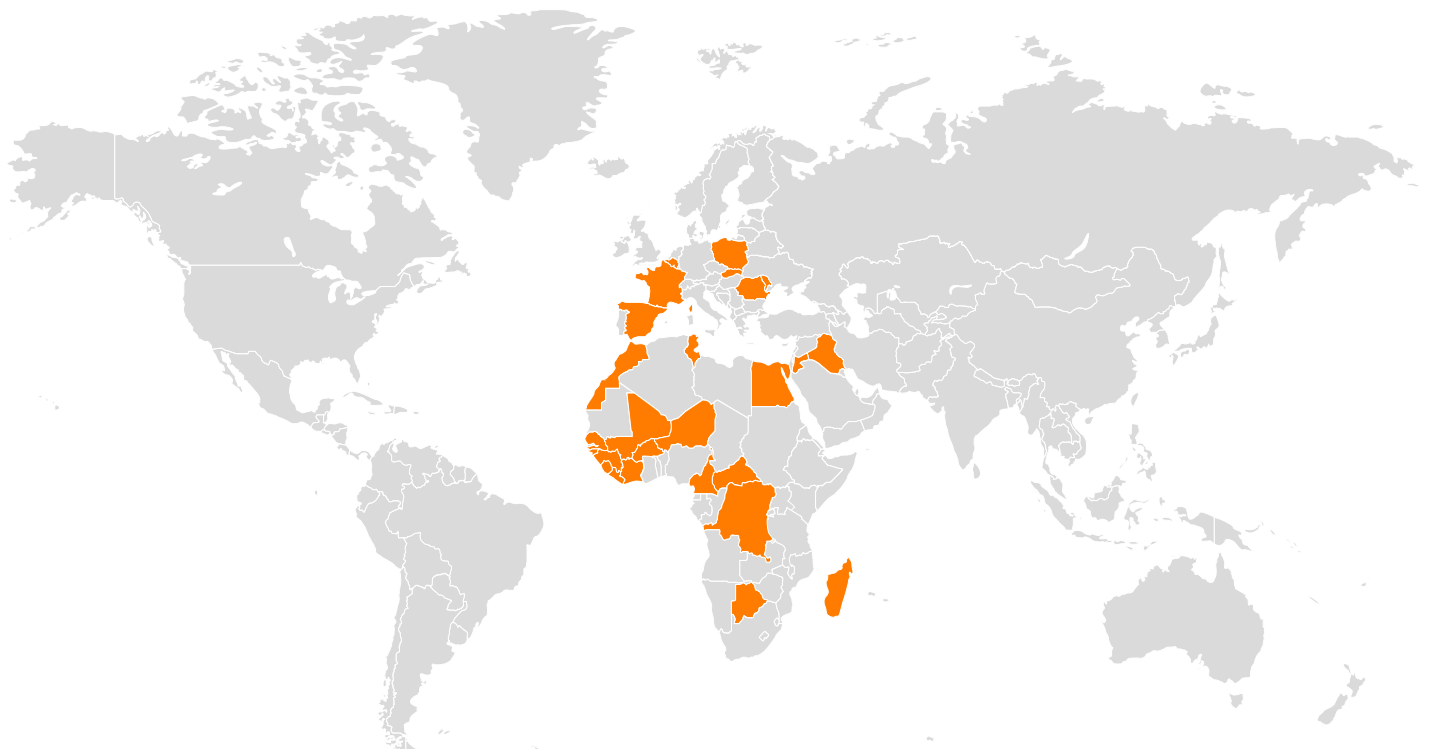
298 million customers



The « **Lead the Future** » strategic plan (2023–2025) is designed around a new business model guided by a spirit of responsibility and efficiency.



137,000 employees



Orange’s purpose: the guiding force for all our actions

The purpose “As a trusted partner, Orange gives everyone the keys to a responsible digital world” is enshrined in the company’s bylaws; it structures and informs our decisions and contributions to society and the planet.

As a result, the Group has made it its mission “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 commitment and expertise of the Group’s teams, Orange rolls out innovative technologies and services everywhere, and for everyone.”



Sustainable Development Goals (SDGs)

Orange has identified 6 SDGs that resonate deeply with its purpose and strategy. These are the ones on which its impact is the most significant, and for which Orange wants to report its progress.

<p>9 INNOVATION AND INFRASTRUCTURE</p> 	<p>10 REDUCED INEQUALITIES</p> 	<p>12 RESPONSIBLE CONSUMPTION</p> 	<p>13 PROTECT THE PLANET</p> 	<p>16 PEACE AND JUSTICE</p> 	<p>17 PARTNERSHIPS FOR THE GOALS</p> 
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Reference framework

The Group's human rights policy is based on the **internationally recognized framework**:

- Universal Declaration of Human Rights
- International Covenant on Economic, Social and Cultural Rights
- International Covenant on Civil and Political Rights
- United Nations Conventions
 - on the Elimination of All Forms of Discrimination Against Women
 - on the Rights of the Child

- on the Rights of Persons with Disabilities
- on the Elimination of All Forms of Racial Discrimination

It is based on the **recommendations of the following texts** for companies:

- United Nations Guiding Principles on Business and Human Rights
- OECD Guidelines for Multinational Enterprises
- United Nations Global Compact

- International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work

It also complies with the laws on modern slavery (Modern Slavery Act⁽¹⁾), the law on the duty of vigilance, international agreements on social rights signed with the international trade union federation (UNI), and the Group's compliance and non-financial reporting obligations.



(1) In particular, the British and Australian laws on modern slavery

Our approach

Human rights are thus at the heart of sustainable development and are central to all its three dimensions – social, environmental and economic. They aim to guarantee human dignity and equality. They refer to a set of fundamental and inalienable rights and freedoms of every individual, without distinction of any kind. They are universal, indivisible and interdependent.

3 categories of rights :

Civil and political rights



Economic, social and cultural rights



Collective rights



Consideration of human rights is reflected in the Group’s policy through its compliance with the United Nations’ three Guiding Principles of “protect, respect and remedy,” which apply to both states and companies.

The principles of **protection** and **respect** refer to the trend toward the universalization of general rights and international standards, as well as to the need for companies to identify, prevent and mitigate risks in line with local environments.

The remedy principle underscores the responsibility to provide

reparations in the event of human rights violations.

Because digital technologies are changing the world and contributing to the development of societies, to such an extent that they can be considered a fundamental need, Orange has also chosen to promote the principle of **connection**.

The choice of this principle echoes the unprecedented impact of digital technology on people’s inclusion in society, the exercise of their rights and the expression of their fundamental freedoms.

These four fundamental principles form the cornerstone of the Group’s policy.

Scope of application

Ensuring respect for human rights is an integral part of the responsibility of the company and its managers, and by its very nature applies to all Group entities and subsidiaries, regardless of geographical area.

The Group is committed to respecting international standards on human rights.

Group entities comply with human rights laws and regulations, which may be reinforced by local provisions overseen by state supervisory authorities. In the event of conflict with

local regulations, the Group strives to find alternative means of complying with international standards without breaking national laws.

The Group communicates its commitments throughout its value chain.

All the Group’s stakeholders are involved in these commitments: employees and their representatives, suppliers and business partners, B2C and B2B customers, civil society and its representatives, investors, authorities, international and industry organizations.

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**Orange's
commitments**



This Group policy provides an overall framework for the various specific policies and commitments that have an impact on human rights and that the Group has adopted as a result of its position as an economic player, a responsible employer, and a digital operator committed to digital inclusion.

Promote digital citizenship

The Group supports a resolutely humanist vision of new technologies and their resulting innovations. In order for people to become responsible digital citizens, exercise their fundamental rights and develop in an increasingly digitalized world, they need to be given the means to act consciously and with confidence. These are the conditions for active, respectful engagement and participation in the virtual spaces that the Group is helping to shape.

Orange aims to provide equitable access to telecommunication services.

The Group is constantly expanding and upgrading its network coverage to make digital services accessible and beneficial to as many people as possible. Networks are operated in a way that guarantees their integrity, the security of communications and their optimization according to end needs. The assurance of an open Internet gives users a free choice of services and content.

Orange has made inclusion in and through digital technology one of the pillars of its social commitment.

The Group firmly believes that digital technology is a lever for empowerment and progress, provided everyone can share in it. However, the rapid digitalization of essential everyday services (administrative acts, access to social rights, culture, health, training, etc.) and the growing demand for digital skills exacerbate the risk of inequality or social exclusion for people who do not have the means to equip themselves with digital technology, do not have access to online services, or are not familiar with digital tools.

Therefore, it is the company's responsibility to promote equal participation in the digital society.

Orange pays particular attention to people who are vulnerable due to their social, economic, geographical, physical or psychological situation.

Orange and its Foundations are committed to understanding and meeting the digital needs of those segments of the population most likely to see their development hindered and to suffer from prejudice, discrimination or disadvantages linked to their environment (climate, economic or political situation).



The Group promotes the acquisition of knowledge and skills by providing digital inclusion programs especially for people with low levels of literacy and/or digital skills.

The Group continues to strengthen its inclusive approach by offering its customers tailored solutions.

A range of affordable equipment and offers are marketed with easy access to a distribution channel (physical or online stores) and customer services.

The adoption of an inclusive 360° approach for different audiences, a multi-year accessibility plan, and the participation of users in product and service development serve as a testament to the Group's increased determination to include people who are often excluded because of disability. This is also reflected in the increasingly customized design of our offers and communication initiatives.

The Group pays particular attention to the protection of children.

Implementing specific measures to protect and promote the rights of children who may face

risks of dependency, exposure and overexposure due to their vulnerability is crucial. To this end, the Group's [policy on child protection and children's rights in the digital age](#) specifies the support provided to combat these risks: family support programs, filtering and parental control tools, cyberbullying support, all of which is promoted through the international **#forgoodconnection** initiative.

Orange is committed to ethical, inclusive and responsible innovation.

The Group promotes inclusive, ethical and responsible AI.

A variety of commitments have been formalized: [Data and Artificial Intelligence Ethics Charter](#), [International Charter for Inclusive AI](#). A Data and AI Ethics Council made up of external experts oversees the proper development and use of AI, while internal guidelines have been drawn up for the responsible use of generative AI. A research program is also being conducted on responsible AI.

The Group campaigns for human rights to be taken into account in virtual spaces with increased

vigilance, given the potential of immersive technologies (virtual reality, mixed reality, spatial computing, metaverses, etc.) to disseminate and amplify the risks of violating fundamental protections and freedoms.

The Group promotes an open innovation ecosystem that fosters human progress by sharing open data resources and open source accessibility solutions, and by participating in or supporting research projects, notably through public/private partnerships.



Strive to respect privacy and freedom of expression

Everyone has the right to freedom and security. While digital technology offers new spaces for expression and opinions, giving every citizen the opportunity to be heard and to exchange their views freely, it is necessary to fight effectively against abuses that could impact privacy protection.

Orange guarantees its customers the protection of their data and digital identity

Data protection benefits from the general framework defined by European regulations (GDPR) and international bodies. The Group acts in compliance with this framework for

all its data processing (corporate information and personal data) across all its activities.

The [Group's security policy](#) and [Code of Ethics](#) are the reference documents that guide the measures taken and their monitoring.

Orange raises awareness of the risks associated with the use of digital data

The risks of data theft, cyber attacks, identity theft, etc. are growing with the development of new technologies, leading to a negative impact on respect for human rights. The Group provides customers with simple tools to help them control, manage and monitor their personal data and how it is used. The Group has also rolled out the Cyber Ready program to improve employee behavior and protective actions in the face of cyber threats.

Orange undertakes not to restrict the right to privacy and freedom of expression

Wherever it operates, the Group campaigns for respect for the fundamental freedoms and protection of individuals, without discrimination of any kind. Requests to limit or interrupt service do not come without an economic

and social impact, therefore they must be justified.

In the event of requests from national authorities to reduce Internet speeds, limit access to certain social networks, interrupt various categories of telecommunication services, suspend or intercept communications, or share personal data with third parties, the Group responds only in cases provided for by the laws and regulations of each country, in accordance with the licenses authorizing telecommunication operations worldwide, and following a precise, formalized and documented process.

The Group respects GNI principles and makes regular reports.

Orange is a member of the multi-stakeholder platform Global Network Initiative (GNI), which brings together companies, non-governmental organizations, investors and universities. It provides the ICT industry with principles and guidelines

to promote a responsible framework on freedom of expression and privacy. The Group thus undertakes to regularly report any requests received to the GNI, which publishes the information annually in an anonymized form. The Group is regularly assessed on its progress in implementing the principles.

In the event of an unjustified request for a service interruption or data requisition, the Group takes the necessary measures, in particular by seeking the support of the GNI for its influence.

In any case, the Group gives priority to the security and freedom of company employees who may be exposed to threats.

To ensure compliance with these principles, the Group calls in dedicated units ahead of periods deemed to be high-risk (elections, international events). These units are coordinated by the Group's security department.



Work for non-discrimination and equal opportunities



The Group affirms its commitment to respecting others

The Group affirms its commitment to respecting others in its [Code of Ethics](#). This commitment serves as a guide for relations with all our stakeholders, as respect must be maintained throughout all our activities and exchanges, not only between Group employees, but also with customers, suppliers, civil society, etc.

The Group is determined to make the company an ever more inclusive place that gives everyone the opportunity to thrive and contribute to creating value for the community.

The Group's diversity, equity and inclusion policy sets out the principles for implementation by all entities and their spheres of influence.

The Group fights against all forms of harassment and violence, offers a comprehensive system

to prevent, detect and handle all situations of harassment, sexism and violence in the workplace, and has zero tolerance for discrimination. This principle applies not only to all employees, but also to all interactions with stakeholders.

The Group firmly believes that diversity is a real asset for social and financial performance, and that the full potential of innovation will benefit the greatest number of people only if it reflects the diversity of our customers.

Orange is developing initiatives that promote equal opportunities

The Group promotes equal opportunities by helping people integrate and develop professionally, no matter their background.

The Group supports local associations and encourages social and solidarity-based entrepreneurship in order to limit

socio-economic divides. This support is reflected in the Foundation's local actions. It is amplified by the implementation of employee commitment programs such as mentoring. In addition, training, acceleration and incubation programs are available for entrepreneurs to help them grow their business.

The Group continues to develop socially responsible and inclusive purchasing practices.

Diversity and inclusion are taken into account in the choice of suppliers, notably through a rigorous selection of companies in the sheltered and adapted employment sector (STPA)⁽²⁾ and which provide employment to promote social integration. Both subsidiaries and subcontractors are also encouraged to implement this approach.

(2) "Secteur du Travail Protégé et Adapté"

Guarantee decent working conditions and do business with confidence

Orange is committed to providing a safe and healthy working environment for all employees in all countries where the Group operates

The Group is attentive to occupational risks and the work/life balance of its employees.

A health, safety, quality of life and working conditions policy sets out general guidelines for the prevention of occupational risks and defines and monitors indicators on the state of health in the workplace.

An occupational health and safety management system (OHSMS) is in place at all Group entities. This system aims to develop a common prevention culture shared by all players.

The Group is committed to promoting work/life balance and offers a number of support measures for employees who are parents or caregivers.

When required by external or individual circumstances, working arrangements are adapted to ensure personal safety and business continuity.

The Group's human resources strategy is based on the values of equity and non-discrimination.

Work is under way to strengthen the system that ensures all employees in all Group entities are paid a decent wage.

The Group listens to its employees and defends social dialogue and freedom of association.

Employee perceptions of the quality

of their working environment are collected and monitored through regular, in-depth exchanges.

To foster ongoing dialogue with employees and allow for collective bargaining with trade union representatives, the Group has forums for social dialogue covering its entire scope.

Agreements on fundamental rights for workers have been signed in conjunction with the international trade union federation, UNI (global agreement on gender equality in the workplace, the fight against discrimination and violence, and work-life balance; global health and safety agreement).

Orange ensures that human rights are respected in all its activities, including those of its suppliers and subcontractors

The Group is committed to ensuring that its principles on working conditions are respected within its organization, its supply chain and, more generally, for all people who may be affected by its activities.

Suppliers and subcontractors must comply with the best international standards, and ensure that their employees and representatives, including temporary workers, enjoy a decent working environment and conditions.

The Group fights against forced labor, child labor, modern slavery and human trafficking within its operations.

The activities of the Group and of its suppliers and subcontractors are carried out in all parts of the world, including where human rights abuses involving third parties with a direct or indirect link can be established.



The fight against non-decent, discriminatory or dangerous working conditions, forced labor, modern slavery and human trafficking is at the heart of the commitments made to remedy this situation, regardless of the geography.

The Group is particularly committed to fighting against child labor, in compliance with international and local frameworks. In its operations, it formally opposes the employment of children under the age of 15 (unless local regulations impose a higher age) and the employment of children under the age of 18 in strenuous jobs, as specified in [the policy on child protection and children's rights in the digital age](#).

Orange incorporates human rights requirements in all its contracts with suppliers.

The Group requires its suppliers to meet these standards, and to apply them in their own purchasing processes, notably via the CSR clause included in contracts and the attached supplier code of conduct.

The Orange [supplier code of conduct](#) describes the ethical, employee-rated and environmental commitments expected by the Group and specifies three obligations relating to human rights: the fight against all forms of discrimination; the prohibition of child labor; and the prohibition of forced labor and modern slavery.

Orange verifies and assesses the compliance of its international equipment suppliers with human rights standards.

The Group is a member of the JAC (Joint Alliance for CSR), an association of telecommunication operators which pools audits at the manufacturing facilities of major suppliers in the Information and Communication Technologies sector. The same approach is required for the subcontractors of these suppliers.

The JAC establishes dedicated working groups in order to adopt



common positions and a shared methodological approach aimed at preventing, monitoring and measuring the implementation of the adopted principles to protect human rights.

Orange conducts its business with honesty, integrity and loyalty

Orange ensures the responsible use of rare minerals.

The Group 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. The Group does not purchase minerals directly and therefore requires its main

suppliers to perform due diligence to avoid using conflicts minerals or from artisanal mines.

The Group encourages its suppliers to organize themselves accordingly. The Group's main suppliers of electrical and electronic equipment adhere to the RBA (Responsible Business Alliance)⁽³⁾ code of conduct.

Orange applies a zero-tolerance policy to corruption.

Corruption undermines the extent to which companies can protect human rights; therefore the Group prohibits all forms of bribery or influence peddling in its day-to-day activities. The [Group's anti-corruption policy](#) clearly sets out this principle and guides employees in the practices they must respect.

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

Mitigate the environmental impact of our activities



Orange advocates a holistic approach to human rights and the environment, as the two are interdependent

The right of access for all people to a clean, healthy and sustainable environment goes hand in hand with respect for human rights. The Group's vision is in line with the United Nations Human Rights Council resolution for the recognition of this right.

The Group is working to protect the environment by committing to be Net Zero Carbon by 2040, in line with the Paris Agreement (mitigation of CO₂ emissions across all scopes and sequestration in natural carbon sinks).

The Group is taking action to treat household and trade WEEE⁽⁴⁾ from equipment at the end of its life, and battery waste considered by environmental regulations to be hazardous waste. A specific Group policy identifies priority issues, defines operating procedures by area and affirms specific commitments to equipment recovery and treatment.

Orange ensures that its activities do not affect the health of local communities

To encourage the social acceptance of its activities, the Group engages in discussions with local residents and populations, in particular when affected by the installation of antennas.

The Group is committed to respecting the protective thresholds for radio waves defined by the ICNIRP⁽⁵⁾, below which international public agencies, including the WHO, unanimously agree that there are no health effects.

To guarantee full transparency of information, the Group makes data on the radio waves emitted by its networks available on a dedicated website, and proactively supports all stakeholders.

(4) Waste electrical and electronic equipment.

(5) International Commission on Non-Ionizing Radiation Protection

03



**Transparency
and governance**



Decision-making bodies

The promotion of human rights is overseen by the CSR Division which, as part of the Group's responsibility, relies on the governance bodies listed below to ensure the proper monitoring of the indicators inherent in each of the activities involving respect for social and societal commitments and compliance obligations.



The CSR (Corporate Social Responsibility) Division, led by a member of the Executive Committee, supports the implementation of the Group's CSR policy within the various operating entities, providing them with the necessary technical and methodological support. It regularly reports to the Executive Committee and the Board of Directors on the progress made. A network of CSR managers covering all the Group's entities and business lines helps roll out the approach in its operations.

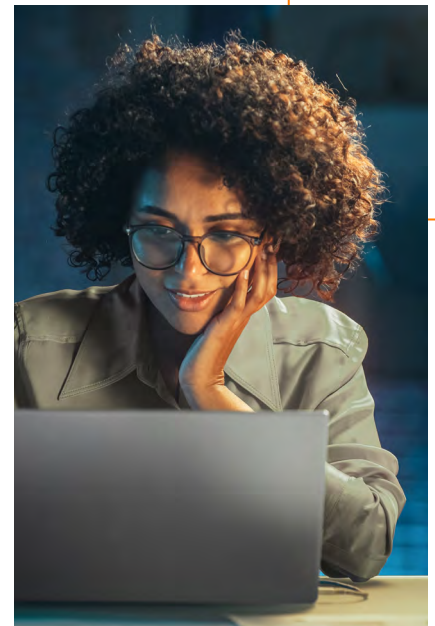
The Governance and Corporate Social and Environmental Responsibility Committee (GCSERC), which reports to the Group's Board of Directors, validates the guiding principles of the corporate social responsibility policy resulting from stakeholder dialogue, ensures the proper application of the Code of Ethics, and supervises the

roll-out of compliance programs. It also ensures that key human rights issues are taken into account at the highest decision-making level of the company.

The CSR and Ethics Committee approves the Corporate Social Responsibility strategy and is responsible for monitoring its implementation and identifying any areas of concern. This committee is co-chaired by the Executive Director of Corporate Social Responsibility and the Group's Secretary General, who is also Secretary of the Board of Directors.

The Group Risk Committee reviews the Group's main risks, makes recommendations to the Executive Committee concerning risk management and the quality of Internal Control, and assists General Management in reporting to the Audit Committee and the Board of Directors regarding risk management. It approves risk mapping, monitors the performance of the annual internal audit program, and follows up on the implementation of audit recommendations and corrective action plans.

The purpose of the **Group Audit Committee** is to monitor issues relating to the preparation and monitoring of accounting and financial information. It ensures the existence and effectiveness of internal control and financial risk management systems. It also examines the financial statements and management reports and ensures the relevance and quality of the information provided to shareholders.



The Responsible Purchasing Committee oversees the implementation of the Group's responsible purchasing policy for all Group entities and subsidiaries. It validates Orange's mandatory CSR commitments in purchasing, in particular with regard to respect for human rights and fundamental freedoms, supports their implementation and ensures that they are met in the proper way, monitoring the main key performance indicators and the effectiveness of the measures put in place.

The Diversity, Equity and Inclusion Strategic Committee is made up of members of the Executive Committee and representatives from the Divisions. It defines the priorities of the policy and the associated performance indicators, approves proposed programs and actions, and monitors their roll-out across the Group.



Risk assessment

Orange conducts a risk analysis of human rights violations by identifying vulnerable points in each country.

The Group commissions an adapted external assessment of human rights risks in each country where Orange is an operator. This assessment is performed by a specialized independent firm using a methodology based on United Nations and OECD standards.

The Group also has defined an internal methodology for analyzing and mapping risks that is capable of tackling all its internal and external challenges and needs. Financial impacts, operational impacts (particularly those linked to business continuity), legal and regulatory impacts, and human and reputational impacts are assessed.

Risks are identified taking into account the following elements:

- Complex geopolitical and socio-economic context
- Government regulations/decisions
- Increased likelihood of risks to human rights
- Impact on Orange



Impact analysis and due diligence

The Group is committed to implementing a process to assess compliance with human rights criteria in the following situations:

- During new mergers or acquisitions of an existing company, in order to assess the company's practices and those of its ecosystem.
- During the sale of a subsidiary, to ensure that the buyer respects good human rights practices.
- When entering into a contract with a new supplier, it being understood that recurring suppliers are periodically vetted.
- When developing new services or implementing new technologies, to ensure that they do not directly or indirectly generate human rights abuses.

Stakeholder dialogue and coalitions

Guided by the pursuit for shared value between Orange and society, the Group bases its CSR approach on repeated, structured discussions with all its stakeholders, particularly rights holders.

The Group has a specific mechanism for defining their priorities and producing a double materiality analysis.

The Group also relies on coalitions and actively participates in national and international initiatives to bolster the industry’s commitment to human rights.

- Global Compact
- GNI: Global Network Initiative
- JAC: Joint Alliance for CSR
- ILO: International Labour Organization ILO GBDN, ILO CLP

- GSMA: GSM Association
- EDH: Entreprises pour les droits de l’Homme

These open discussions help to identify the major human rights issues for which stakeholder expectations are high, and for which collective, concerted action should be taken.

Training and awareness-raising

Orange raises awareness and provides training on human rights to its employees and supply chain partners



Dedicated training for Group employees

The Group offers an e-learning program which allows employees to identify human rights-related issues in their day-to-day activities as well as the most high-risk areas and activities, and to develop good habits.

In addition, there is a wide range of training courses on topics related to human rights, such as ethical artificial intelligence, duty of vigilance, an e-learning course on preventing corruption, security awareness and personal data protection compliance, and as well as a catalog of training courses on diversity and inclusion.

CSR training for buyers

The Group is constantly raising awareness of responsible purchasing practices among all those involved in the supply chain, through mandatory training modules tailored to specific needs.



Whistleblowing

Orange offers several whistleblowing systems, open to all Group employees as well as to partners, suppliers and external stakeholders.

The Group ensures that each component of its organization has systems in place to report offenses or fraud.

It undertakes to address all reports concerning human rights and to protect whistleblowers and their anonymity.

Orange whistleblowing systems

The Group’s whistleblowing mechanism consists of a system called **Hello Ethics (orange)**.

integrityline.org), as well as local systems in certain subsidiaries. Depending on the choice made by each subsidiary, reports are received either via Hello Ethics or via an email address. Reports may concern serious violations of human rights and fundamental freedoms, personal health and safety or the environment, fraud, corruption, conflicts of interest or any ethical breaches, situations of sexism, harassment or violence in the workplace, or any other

violation of laws and regulations. Reports may be made anonymously by any Group stakeholder, whether internal or external (including suppliers and supplier employees).

Allodiscrim, an anti-discrimination listening and information hotline, is also available to all Group employees, as well as to job applicants, to report discrimination.

A report is drawn up and included in the annual management report.

Reporting



Every year, Orange produces non-financial information that takes human rights into account.

The Group reports on actions it has taken in terms human rights in the conduct of its business, as well as their impact on employees, the value chain, affected communities and end users. This information appears in the social section of the non-financial report of :

- **the Universal Registration Document**
- **the Vigilance Plan and its report**
- **Orange’s statement on modern slavery and human trafficking.**

These documents are updated and published annually.

The Group also publishes a **transparency report** on freedom of expression, information and privacy, reporting on government requests.

Policy monitoring



The human rights policy is reinforced by a twice-yearly review.

A regular assessment and discussions with the entities concerned form part of a continuous improvement process and help

enhance the understanding and transparency of corrective actions. The conclusions of the reviews carried out within the entities will be

the subject of a documented report for the CSR division.

04

Appendix



Policies and documents cited



- Policy on child protection and children's rights in the digital age
- Group anti-corruption policy
- Group security policy
- Diversity, equity and inclusion policy
- TBC
- Duty of vigilance policy
- Orange policy for the treatment of household and trade WEEE and waste batteries



- URD
- Vigilance Plan and its report
- Transparency report
- Orange statement on modern slavery and forced labour

- Supplier code of conduct
- Code of Ethics
- International Charter for Inclusive AI
- Data and artificial intelligence ethics charter



- GNI Principles
- JAC guidelines



- Hello Ethics
- Allodiscrim

