

local copper loop, for which Arcep had given it formal notice for in its decision n° 2018-1596-RDPI.

4.2.5.3 Access to FTTH infrastructure

- On 30 January 2020, Bouygues Telecom seized Arcep (the French telecoms regulator) with a claim to settle the disputes over the FTTH rental price offered by SFR FTTH (now XpFibre) in the "SFMD" zone (the legacy SFR AMII Medium Dense Area + AMEL zone). Arcep, in a decision on 5 November 2020, compelled SFR FTTH to restore the applicable co-financing rates which were in force before 1 February 2020 and to offer Bouygues Telecom a maximum rental price of €13.20 ex. VAT/month/line. SFR has lodged an appeal against this decision to the Paris Court of Appeal.
- On 14 October 2021, Bouygues Telecom seized Arcep with a claim concerning the disputes over the financial terms for reimbursing the activation fee for connecting end-customers within the scope of the contract of access concluded with Orange in its capacity as an FTTH infrastructure operator in the Very Dense Areas of France. On 29 March 2022, Arcep granted Bouygues Telecom's claims, directing Orange to modify the provisions in its contract concerning returning contributions for connection costs. Orange has lodged an appeal against this decision with the Paris Court of Appeal.

4.2.5.4 Huawei Equipment Authorisations

In April 2022, Bouygues Telecom sent the French Prime Minister a request to indemnify the loss caused by the replacement of Huawei equipment required by the law of 1 August 2019 and the Government's decisions in some urban areas. In August 2022, and after the Prime Minister's silence of almost two months, Bouygues Telecom and Bouygues Telecom Business Distribution filed an application for compensation with the Paris Administrative Court for a loss which is provisionally valued at €82 million.

4.3 VIGILANCE PLAN

France's corporate duty of vigilance law no. 2017-399 passed on 27 March 2017 requires certain companies, including Bouygues SA, to draw up and implement an effective vigilance plan setting out the reasonable due diligence measures taken to identify risks and prevent serious violations of:

- human rights and fundamental freedoms,
- health and safety of people, and
- the environment,

resulting from the operations of the company and its subsidiaries and those of subcontractors or suppliers with which they have an established business relationship.

This Bouygues SA vigilance plan covers Group companies, except for Equans, and therefore the operations of its five business segments (Bouygues Construction, Bouygues Immobilier, Colas, TF1 and Bouygues Telecom). The acquisition of Equans was completed on 4 October 2022 and work has begun on aligning this new business segment's practices to those of the Group as quickly as possible. The plan also covers the operations of suppliers and subcontractors that work with the Bouygues group and with which it has an established business relationship. The Group's business activities are diverse and have a broad geographical reach, with operations in over 80 countries. In addition, its construction business worksites are temporary. Its activities therefore involve a large number of

4.2.5.5 Free Mobile roaming

On 1 March 2021, Bouygues Telecom appealed the judgement of the Paris Administrative Court dated 30 December 2020 which dismissed its claim to order the French State to pay it €2.285 billion as damages for its loss between 2011 to 2015 caused by the failure to regulate the roaming agreement between Free Mobile and Orange.

4.2.5.6 Tel and Com c/Bouygues Telecom

Tel and Com, a specialised distributor whose contract was not renewed when it expired, filed a claim against Bouygues Telecom in the Paris Commercial Court on 10 November 2015 alleging the sudden break off of an established business relationship. Tel and Com claimed that Bouygues Telecom had not given a sufficient period of notice and claimed damages of €125.7 million for its loss. In a judgement dated 20 December 2019, the Paris Court of Appeal held that the periods of notice given by Bouygues Telecom had been sufficient. Following an appeal lodged by Tel and Com, the *Cour de cassation* partially quashed this judgement, returning the case to the Paris Court of Appeal to be rejudged by a different bench of judges. The distributor is claiming an indemnity of €120 million before the Court of Appeal to which the case was transferred in December 2022.

4.2.5.7 Impacts of 5G frequencies

In May 2020, a collective of 500 natural persons served summonses in summary proceedings on the four mobile network operators (Orange, SFR, Bouygues Telecom and Free Mobile) before the Paris Judicial Court requesting the appointment of a judicial expert to assess the impact of 5G on health, the environment and privacy. The Paris Judicial Court and the Paris Court of Appeal held that they lacked jurisdiction to order a general investigation into 5G. Some of the initial claimants have appealed.

people and its supply chains can be very complex, which necessarily limits the overall visibility it is possible to have over them. This vigilance plan is therefore complemented by more systematic multi-stakeholder and sector approaches adapted within the Group.

The vigilance plan for each business segment is presented below. It describes the key risks, the key prevention or mitigation measures already in place and any additional measures to be taken, which together constitute the appropriate actions required by the law to mitigate the risks or prevent serious violations.

Some prevention or mitigation actions are described in more detail in Chapter 3 (SNFP) of this URD.

Governance

The vigilance plan is based on work done by committees created by the business segments comprising representatives of their CSR, Legal, Purchasing, Human Resources, Health & Safety, and Internal Audit and Control departments.

Committees have also been created to encourage inter-business segment work, such as the Duty of Vigilance Committee that brings together the Legal and CSR departments of each business segment and of Bouygues SA. This committee met quarterly in 2022. Some specific matters addressed in the vigilance plan were also addressed by the Climate and Biodiversity,

Responsible Purchasing, QSE, Sustainability and Non-financial Reporting committees.

Lastly, the vigilance plan is submitted to the executive body of each business segment for its own scope.

The Group's vigilance plan is submitted to the Bouygues' Group Management Committee, to the Ethics, CSR and Patronage Committee, which is a special committee of Bouygues SA's Board of Directors, and to the Bouygues group's Board of Directors.

Group-wide measures

Code of ethics

Respect, integrity and responsibility are fundamental core values at the Bouygues group. The Group's Code of Ethics, which was updated in 2022, states that employees and senior executives of the Group are expected to embrace these values, in particular as regards respect for human rights, the environment, health and safety, prevention of corruption, influence peddling and fraud, and compliance with personal data protection rules. It is updated regularly and is available on the websites and Intranet sites of both Bouygues SA and the business segments.

Human Resources Charter

The Bouygues Human Resources Charter focuses on the health and safety of employees, fair pay and equal opportunity, a guaranteed minimum standard of employee benefits for all going beyond the minimum requirements in each country, and high-quality labour relations. In this vein, the Group has rolled out its BYCare programme which aims to provide those standard minimum benefits for all employees working internationally.

CSR Charter for Suppliers and Subcontractors

A Group-wide CSR Charter for Suppliers and Subcontractors drawn up by the parent company sets out the key commitments required of suppliers and subcontractors wishing to work with the Group. It was updated in 2022 to further reinforce compliance with our vigilance obligations and more particularly to explicitly set out the requirement for our supplier partners to implement low carbon solutions. It also includes the "employer pays" principle, which requires all recruitment costs to be paid by the employer and not the employee.

A master agreement was signed in 2022 by the Bouygues group and EcoVadis enabling the five business segments to use the EcoVadis platform to assess the CSR performance of their suppliers and subcontractors. An amendment to the agreement was signed in November 2022 to include Equans.

Specific action

More specific action on the various duty of vigilance issues has also been taken at Group level.

- Human rights

In 2022, Bouygues joined *Entreprises pour les Droits de l'Homme*, a non-profit that helps companies to embed human rights vigilance measures into their operations.

On 25 January 2023 in Paris, the Bouygues group signed the #StOpE initiative, a commitment to ending casual sexism in the workplace, covering all its subsidiaries (Bouygues Construction, Bouygues Immobilier, Colas, Equans, TF1, Bouygues Telecom).

- Environment

In response to the climate crisis, the Bouygues group has made tangible commitments to reduce its greenhouse gas emissions in line with the Paris Agreement. The Group unveiled its Climate strategy and the various business segment versions of it at the end of 2020. The Climate strategy aims to reduce greenhouse gas emissions while at the same time remodelling the Group's commercial solutions, embracing opportunities for new business activities and helping customers and product and service users to meet their own carbon reduction targets.

The Group has adjusted its emissions reduction targets to make them SBTi^a compatible in order define objectives aligned to IPCC recommendations.

Global warming also has an impact on our business activities and the products we deliver. In 2023, the Bouygues group will therefore perform an analysis to assess how vulnerable its business activities are to climate risks.

The Group also joined forces with Essec business school to create a Global Circular Economy chair, the first international chair dedicated to the circularity. Its objective is to train the future Chief Circular Economy Officers to lead organisations towards a circular economy.

Lastly, on 26 September 2022, a training session on "the economic impacts of climate change", jointly run with speakers from Carbone 4, Shift Project and Carbon Disclosure Project, was held at Bouygues SA to raise the awareness of Bouygues directors about energy and climate constraints and the new potential low-carbon business models and solutions.

- Suppliers and subcontractors

In 2022, each business segment organised a conference to engage their suppliers and subcontractors in CSR approaches designed to improve their social and environmental impact on value chains.

Stakeholder dialogue

The committee of stakeholders, which comprises seven external people selected for their representativeness and expertise, met for the third time in July 2022 following its previous meetings in 2018 and 2021. The committee's role is to build an open dialogue between the Group and its stakeholders and to determine areas for improvement to the vigilance plan and its implementation in the Bouygues group.

(a) Science Based Target Initiative.

4.3.1 Bouygues Construction

Governance

Bouygues Construction's governance is the responsibility of the Ethics Officer and comprises the CSR, Environment, Health & Safety, Purchasing, Legal, Internal Audit and Control, and Human Resources departments. A vigilance steering committee comprising representatives from those departments meets twice a year.

The CSR and Compliance Officers review the risks and prevention or mitigation actions identified below at least once a year with the relevant managers to ensure that they are appropriate and properly monitored. This review is presented annually to the duty of vigilance committee and then to Bouygues Construction's Executive Committee. It is also presented frequently within the various Bouygues Construction entities.

In 2022, over 3,200 Bouygues Construction key managers signed an ethics and compliance pledge, which includes the Bouygues Construction vigilance plan.

In addition, Bouygues Construction continues to roll out its TopSite labelling scheme, which covers five areas: Health & Safety, Environment, Human Resources, Society and Quality & Customer Involvement. It applies to all construction worksites lasting over six months and worth more than €3 million.

Risks and actions taken

Specific actions are taken to address the risks identified in the table below, in compliance with ILO international standards for risks relating to human rights and fundamental freedoms and health and safety.

Key risks and description	Prevention or mitigation actions initiated or continued in 2022
Human rights and fundamental freedoms	
Child labour Company – Employing people who are not of legal working age on worksites and other sites Suppliers/subcontractors – Suppliers or subcontractors employing people who are not of legal working age on worksites	<ul style="list-style-type: none"> • Identity checks on all employees registered in the HR information system • Systematic check-in required to gain entry (for closed worksites and other sites): identity checks using an "e-checkin" tool. These checks are a mandatory criterion for obtaining the TopSite label. • Internal guide to preventing illegal labour in France currently being revised. Available in Bouygues Construction entities since 2009 (wider circulation since 2017), it sets out the key principles, procedures, roles and responsibilities of the legal, human resources and operations departments. This revision will include provisions regarding the ban on child labour. • Dissemination by HR departments of a guide setting out the minimum legal working age for all countries where Bouygues Construction operates. • Revision of the internal guide to preventing illegal labour. • Training campaign on the prevention of illegal labour in all French entities. • Social audits performed on 80% of at-risk suppliers in high-risk countries at risk (e.g., Ivory Coast, Thailand, etc.) by inspection and certification companies accredited by Bouygues Construction Purchasing^a (SGS, Intertek, Bureau Veritas).
Forced labour Company – Cases where an employee is in a situation of forced labour Suppliers/subcontractors – Cases where an employee of a supplier or subcontractor is in a situation of forced labour	<ul style="list-style-type: none"> • Standardized hiring procedures in all countries: signature of an employment contract, identity checks, hiring reported to the appropriate government department (where applicable). • TopSite audits performed on entities. • Internal audit plan covering between 2 and 4% per year of Bouygues Construction's sales: <ul style="list-style-type: none"> ▪ France: guidelines and test scorecards to check whether the internal guide to preventing illegal labour is properly applied on worksites; ▪ International: routine checks on pay arrangements for employees, drawing up employment contracts, compliance with working hours, provision or not of housing (respect for living quarters standards where applicable). • Revision of the internal guide to preventing illegal labour • Periodic inspections at worksites and other sites. These inspections are a mandatory criterion for obtaining the TopSite label. • France: use of the e-checkin tool and revision of the internal guide to preventing illegal labour. • International: responsibility lies primarily with the operations directors supported by various departments (human resources, legal and finance).

(a) Entity in charge of purchasing.

Key risks and description	Prevention or mitigation actions initiated or continued in 2022
Non-compliance with local labour law Ignorance of a local regulation	<ul style="list-style-type: none"> • Social audits performed on 80% of at-risk suppliers in high-risk countries (e.g., Ivory Coast, Thailand, etc.) by inspection and certification companies accredited by Bouygues Construction Purchasing (SGS, Intertek, Bureau Veritas). • Human resources managers present in all operating entities or units (countries or geographies). Group-wide organisation of human resources departments: managers are part of an HR network rolled out in all entities, which works on the basis of shared processes. • Introduction of an "HR Index", which defines the recommended human resources standards to be implemented in due course in all Bouygues Construction operations. The index is used to assess the maturity of the Human Resources policy based on objective assessment criteria. The HR Index covers five themes: resource management, career development, pay and employee benefits, the HR core model and quality of life at work. • Internal audit checks on compliance with local labour law as part of the audit plans.
Quality of life and living quarters for site workers working away from home Quality of life and accommodation in living quarters that do not comply with Bouygues Construction standards	<ul style="list-style-type: none"> • Living quarters standards applicable in all entities. • A "living quarters compliance" criterion included in projects. • Health & Safety department checks on implementation of the standards. • A specific criterion regarding this risk included in the TopSite labelling scheme.
<p>In practice:</p> <p>Bouygues Construction has drawn up living quarters standards that comply with ILO standards setting out the minimum quality and comfort requirements in housing facilities provided for site workers and employees working away from home, no matter what the country or workplace. They cover the design, management, operation and maintenance of living quarters. These new standards therefore aim to drive continuous improvement in the living conditions of Bouygues Construction employees. They are regularly checked during TopSite audits.</p>	
Personal data breaches Personal data leaks (employee, customer, supplier, subcontractor data), confidentiality breaches, cyberattack	<ul style="list-style-type: none"> • Appointment of Data Protection Officers (DPO) or Privacy Managers. • Formal procedures updated in line with regulatory changes. • Roll-out of a tool for managing GDPR-related regulatory requirements. • Training programme rolled out (in-person and online) and a new Intranet space dedicated to personal data protection for employees. • Monitoring contractual commitments, both intra-group and with subcontractors. • Internal memos sent to employees to raise their awareness about personal data protection issues.
No staff representative body Failure to respect the freedom of association and effective recognition of the right to collective bargaining guaranteed by the ILO Declaration on Fundamental Principles and Rights at Work	<ul style="list-style-type: none"> • France: <ul style="list-style-type: none"> ▪ high level of turnout in employee representative body elections: between 85% and 90%. ▪ monitoring of the industrial conflict rate (calculated based on the number of strike days as a ratio of the number of days worked) at Bouygues Travaux Publics: 0% in 2022. • Europe: implementation of a European Works Council with Bouygues SA responsible for its governance. • Long-standing relations with trade union partners, enabling issues to be addressed on a worldwide level.
Discrimination Assessment of employees on discriminatory factors other than their skills and performance during their recruitment or potential promotion interview	<ul style="list-style-type: none"> • Diversity and Inclusion policy based on four key areas: gender balance, disability, qualifications/diversity of background, and diversity of origin. An action plan is drawn up for each of those areas, including training, awareness-raising, KPI monitoring and tangible actions to support employees. • Group Human Resources Charter used as reference guidelines for the prevention of discrimination of all kinds. • Awareness-raising and training of all young HR employees and recruiters on equal opportunity at least once every five years, on the HR culture, and as part of the Diversity of backgrounds training module for managers.

Key risks and description

Prevention or mitigation actions initiated or continued in 2022

- Continuation of the "Speak UP" initiative aiming to fight all types of hostile behaviour and psychological or sexual harassment in the workplace. Circulation of "Speak Up" posters and brochures, and raising awareness of the management committees.
- Bouygues Construction's diversity strategy strengthened and extended to cover diversification and internationalisation of staff profiles by developing a feedback and inclusive management culture.
- Introduction of gender balance metrics including the Bouygues group indicators (percentage of women senior positions and managers and percentage of women "high-flyer" managers), promotion rate and gender balance in the entities' management committees.

In practice:

Following programmes devoted to young people and then women, the third "Job Academy" season took place in November 2021 to help marginalized people looking for jobs. In 2022, the programme was devoted to people with disabilities. For four months, a group of volunteer employees took part in journeys of discovery, exchanges, workshops, etc., to help their respective mentees make the most of themselves in their CVs, during job interviews and in their working lives.

Health and safety

Security breaches

Harm to people (employees and partners) following acts of terrorism, violence, banditry, natural disasters, war, etc. that could require emergency evacuations, including medical evacuation

- An international security policy based on supervision, analysis, training and monitoring of employees in sensitive geographies, including arranging medical evacuation where necessary.
- Review of travel requests in the Covid-19 pandemic context.
- Review of the security context and Executive Committee approval for any plans by Bouygues Construction to begin operating in a new country.
- A training programme for managers on violence in the workplace in France.
- Systematic involvement of the Security department in audits performed by the Internal Audit department.
- Status reports drawn up by the Security department on the various group head offices in France to check that they have a security plan and a system to escalate security-related issues. An action plan is implemented if necessary.

In practice:

In France, Bouygues Construction has similar security arrangements to those in place in high-risk countries.

Outside France, Bouygues Construction closely monitors changes in the geopolitical climate in its countries of operation. This may lead to withdrawing its staff from a country (leaving the country for non-nationals, returning home for locals), suspending or closing down and securing worksites. For example, Bouygues Construction has withdrawn from high-risk geographies such as Myanmar.

Workplace accidents

- All entities have specific health and safety policies with a management system that includes:
 - policies and related procedures based on Bouygues Construction's management fundamentals and principles, which are generally based on MASE or ISO 45001 standards. Audits are performed by a third party to ensure that the principles comply with those standards. Health and safety management systems have been updated in most operating entities to meet ISO 45001 standards;
 - tightening up the policy on the wearing of personal protective equipment (PPE) and publication of a list of authorised equipment for France (shoring towers, cordless power tools, floor formwork, etc.);
 - tightening up the policy on managing major risks (i.e. which can cause irreversible harm to health), with a specific focus on events classified as serious. This policy is reviewed regularly by senior management bodies;

Key risks and description

Prevention or mitigation actions initiated or continued in 2022

- a single on-line system used to report workplace accidents worldwide, which includes all stakeholders on worksites;
- signature of the OPPBTP (the French professional body for the prevention of occupational hazards in the construction and civil works sectors) agreement on silica risks (measuring exposure to silica dust);
- implementation of the Cority system: a single reporting tool for accidents and near misses used worldwide. A reference base of all active and closed worksites has been created; and
- implementation of "security status reports" used as a basis for discussing recent major accidents and identifying and analysing the prevention measures taken.
- Health and safety training for key operations staff (worksites, services business, etc.) and support departments (methods, equipment services, etc.):
 - continued "Safety leader 1, 2 and 3 training" aiming to instil safety principles and behaviours and roll-out of a level 4 training programme in some entities for top management of operating units;
 - Leadership in Health and Safety programmes to strengthen the safety culture;
 - launch of the Safety Academy: providing dedicated training for Health & Safety staff developed jointly by Bouygues Construction University and the Health & Safety officers of each group entity. Employees can consolidate their expertise and acquire new skills through hybrid modules combining virtual classes, distance and in-person training and e-learning;
 - training of subcontractors: each entity defines its own rules depending on the country, project size and length, etc. For example, Bouygues Bâtiment has set up a system for assessing its subcontractors.
- Regarding relations with external stakeholders:
 - health and safety clauses included in master agreements with temporary employment agencies, improved health and safety induction training for temporary staff and monitoring safety objectives (six indicators included in the agreements);
 - a list of banned products included in master purchasing agreements, with penalties for breach; and
 - safety performance assessment of subcontractors using the e-procurement tool (Ivalua project under development).
- Regarding research and development:
 - publication in March 2022 of a white paper summarising proposals for improving preventive measures for the operation of heavy machinery on worksites;
 - use of simulators to train and validate the skills of heavy machinery operators and site managers;
 - root cause analysis of workplace accidents; and
 - development of an "ergo app" to rationalise and select construction materials that comply with safety and ergonomics criteria.

Key risks and description

Prevention or mitigation actions initiated or continued in 2022

In practice:
 Development of a new telescopic handler, which now includes six new safety functions.
 Development and testing of a bracelet that can detect the presence of electrical current.
 Development and distribution of a cordless angle grinder with an advanced embedded safety system comprising four unique safety functions.

Occupational diseases

Occupational diseases are defined in tables issued by the French Social Security department.

- Specific policies: implementation of an occupational health and safety management system (particularly as regards ergonomics) rolled out to most entities based on ISO 45001 standards:
 - allocation of specific resources to the Ergonomics department, which has a global scope, supported by a roll-out plan and support measures in the field;
 - standards on manual handling operations applicable on sites, including stickers to identify load weights;
 - strengthening the policy and related arrangements to fight addictions (alcohol, drugs); and
 - developing anti-noise and anti-dust initiatives, including:
 - a programme to map the risk of exposure to silica dust with the OPPBTP; and
 - a campaign in the United Kingdom on the hearing protection policy.
- Training:
 - morning warm-up sessions before starting work on-site to prevent musculoskeletal problems;
 - "health workshops" to raise site worker awareness about looking after their health and preventing musculoskeletal disorders; and
 - ergonomic risk training and awareness plans with the Methods and Organisation department and the Health & Safety departments.
- Regarding research and development:
 - continued trialling of materials and equipment designed to reduce arduous working conditions (bionic glove, muscle load data capture systems such as "Système Captive", which is used for example to select floor formwork systems in France); and
 - continued research in France on the most dangerous chemicals used on sites: ban on and/or replacement of products ("Pablo" and other platforms, tightening up the general purchasing terms and conditions), improving knowledge about chemicals with Safety information sheets (new Ecomundo tool currently under development).

In practice:
 Bouygues Construction has conducted the following research and development work:

- Harmonising and digitalising workstation ergonomics risk assessment, notably using the KizErgo tool;
- Implementing a digital tool for listing equipment and construction methods that take ergonomic and safety risks into account (Ergo Mat').

Key risks and description

Prevention or mitigation actions initiated or continued in 2022

Environment

Environmental risks related to operations (waste, water, etc.) and in surrounding areas (noise pollution, air quality, biodiversity, wastewater, etc.)

Direct environmental impact of site operations (energy, waste, water, etc.) and impact on surrounding areas (noise pollution, air quality, biodiversity, wastewater, etc.)

- A central "Responsible and Committed" CSR policy, with twelve commitments covering the risks identified, including four on the environment (carbon strategy, biodiversity, responsible timber sourcing, and the circular economy).
- ISO 14001 certification providing assurance that the company has an effective environmental management system for its business activities and that environmental risks are identified and managed.
- Environmental audit under the TopSite labelling scheme based on five criteria (environmental analysis documented by site identifying the site's environmental risks and associated prevention plans, analysis of the site's greenhouse gas emissions, analysis of water consumption, waste monitoring and monitoring the impacts on surrounding areas including noise pollution and biodiversity).
- As regards biodiversity, in 2021 Bouygues Construction signed individual commitments within the framework of Act4Nature International.

In practice:

In the circular economy, Bouygues Bâtiment France unveiled the launch of Cynéo at the Sibca low-carbon building trade show. Cynéo is a technical repurposing centre that aims to accelerate the development of new circular products.

Climate risk

Impact of activities on the climate:

- Continued roll-out of the Climate strategy by acting on all reduction drivers and creating a new carbon mindset internally (awareness-raising and embedding in all processes including the financial and operational management cycle):
 - training and awareness-raising to get each and every employee to embrace the Climate strategy on a day-to-day basis: e-learning module "Acting for the Climate" (*Agir pour le climat*) available on ByLe@rn launched in 2021 to help better understand the carbon impact of the construction sector and the drivers that can be activated. All senior positions and clerical/technical/supervisory employees must have completed this module by 2023. In addition, the percentage of employees having completed this module is now one of the CSR indicators in the new 2022 incentive agreement, with a target of at least 75% of employees trained by the end of 2022.
 - SBTi: SBTi certification process initiated in July 2022. Bouygues Construction also takes part in the SBTi's Expert Advisory Groups responsible for developing a guide for the construction sector. This process requires the company to set ambitious medium-term emissions reduction targets, i.e. -40% for energy use (scopes 1&2), -30% per m² for indirect emissions related to buildings (scope 3), and -20% for other indirect emissions (scope 3), over the 2021-2030 period.
 - Vehicle fleet: an increase in the number of green vehicles (emitting less than 60 grammes of CO₂ per km per year) from 191 in 2021 to 323 by 30 September 2022.
 - As regards timber construction (a major driver for reducing the carbon footprint):
 - 160 projects were identified in 2022. French timber sourcing has been made more reliable with the signature of partnerships with PiveteauBois and Stora Enzo for CLT³, in association with the French Building Federation (30% of timber used in 2021 carried the "Bois de France" label, with a target of 50% in 2025);
 - Linkcity has pledged that 50% of its building permit applications will be for timber projects in 2027 and has signed the Fibois Grand Est, Île-de-France and Auvergne-Rhône-Alpes pledges (20% of the surface area of all projects to comprise bio-sourced timber).

(a) Cross-laminated timber.

Key risks and description

Prevention or mitigation actions initiated or continued in 2022

TopSite labelling scheme examples

Bouygues Bâtiment	Arena Porte de La Chapelle in Paris, the site of the upcoming Paris Olympics, is the first site in France with a batching plant producing clinker-free cement-based concrete (clinker being the main culprit of conventional concrete's carbon impact, replaced by alkali-activated blast furnace slag).
Bouygues Travaux Publics	The T3 tram line project in Paris uses a hydrogen-powered generator developed by Bouygues Energies & Services, Loxam and Bouygues Construction Matériel.
Bouygues Bâtiment International	Implementation of Smart Impulse to digitalize electricity use monitoring at several sites.
Bouygues Bâtiment International	For the Edmondson Park South Commuter Car Park Project in Australia, initiatives have been taken regarding water, energy and waste management to reduce the site's environmental impact: 90% of construction waste has been recycled or not sent to landfill.

Purchasing department's response

Bouygues Construction Purchasing has taken three actions in response to issues involving human rights and fundamental freedoms, health and safety and the environment:

- The Acesia questionnaire (for the first three quarters of 2022) and EcoVadis questionnaire (from the fourth quarter of 2022) are sent to suppliers and subcontractors to:
 - assess our partners through an analysis of their strengths and areas for improvement in the following fields: environment, social impact and respect for human rights, ethics and responsible sourcing;
 - provide access to advice and action plans to focus efforts on sustainability and developing remedial action to improve CSR performance;
 - provide access to benchmarking studies by business sector: internal and external benchmarks;
 - manage and oversee the supply chain's CSR performance to promote continuous improvement.
- Social audits of suppliers and subcontractors: since 2019, over 80 audits performed by three specialist companies (SGS, Intertek and Bureau Veritas) to:
 - check compliance with contractual clauses on human rights. The areas assessed are child labour, forced labour, recruitment conformity, health and safety, freedom of association, discrimination, disciplinary practices, working hours, pay and benefits, working environment, compliance and anti-corruption control;
 - assess the company's health and safety policies. The points assessed are work facilities, readiness for emergency situations, workplace accidents, machine safety, safety risks, chemicals and hazardous materials, and dormitories and canteens;
 - check that the impact of suppliers' activity is not harmful to their environment.
- The Group's CSR Charter for Suppliers and Subcontractors is appended to all purchase contracts, formally setting out the commitments to be complied with by suppliers and subcontractors. The charter imposes certain requirements and failure to comply can lead to measures that may go as far as contract termination.

Examples of suppliers' reactions following an audit:

Supplier in Hong Kong	<ul style="list-style-type: none"> • Safety committee created • On-site risk assessment performed • Fire drill organised • Training sessions on forced labour, freedom of association, non-discrimination and anti-corruption • Improvements to attendance records, which now also specify the maximum amount of overtime allowed
Supplier in Turkey	<ul style="list-style-type: none"> • Ethics committee created to monitor objectives and perform an assessment of the company • Training in business ethics introduced • Atmospheric emissions included in the environment policy • General management announcement on overtime

On 23 November 2022, Bouygues Construction brought together its suppliers, subcontractors and strategic partners to share its new strategy and the crucial importance of having a committed supply chain.

Action plans and areas for improvement

In 2023, Bouygues Construction intends to improve and strengthen existing actions already taken in 2022, mainly through the internal TopSite labelling scheme and by working with subcontractors and suppliers (through the EcoVadis platform, disseminating the CSR Charter for Suppliers and Subcontractors and external audits of at-risk suppliers).

As regards fundamental human rights, Bouygues Construction's senior management intends to send out communication materials presenting the fundamental principles in this area. A new audit on undeclared labour practices in France will also be performed.

Bouygues Construction is committed to promoting health and safety by supporting internal research and development projects to improve the working conditions of its site workers and to limit workplace accidents and occupational diseases. These projects will be supported by stronger continuous improvement of risk mitigation measures: improving procedures, upgrading equipment, tightening up rules and instructions, and revising health and safety management guidelines.

4.3.2 Bouygues Immobilier

Governance

Bouygues Immobilier has a vigilance plan monitoring committee comprising representatives from the Compliance, CSR and Internal Control departments, as well as risk contributors and managers (Purchasing, Human Resources, Climate, QSE and Data Protection Officer). The Ethics and Patronage Committee reports on the vigilance plan.

In addition, the risks and prevention or mitigation actions described below have been submitted to the company's senior management and Executive Committee.

Bouygues Construction's commitment to the environment will be reflected in the revision of:

- its entire CSR strategy in 2023, with a new roadmap out to 2030;
- the TopSite labelling scheme to be in line with the new CSR roadmap; and
- the continued roll-out of the Climate roadmap aiming to substantially reduce greenhouse gas emissions by 2030.

Lastly, Bouygues Construction intends to continue its employee awareness and information campaigns on vigilance plan issues to prevent the occurrence of risks.

Risks and actions taken

Specific actions are taken to address the risks identified in the table below.

Key risks and description

Prevention or mitigation actions initiated or continued in 2022

Human rights and fundamental freedoms

Breach of fundamental rights, in particular in the case of undeclared labour or illegal posting of workers

Use of undeclared labour by contractors, subcontractors or partners

Non-compliance with project owner's obligations (duty of care and fight against undeclared labour)

- Revision of the Works Purchasing procedure, including the mandatory use of *Attestation Légale* (a solution for monitoring a company's administrative compliance before starting the works).
- Continued in-person "Project Owner's Responsibility" training for project teams and site managers on the checks to be performed by the project owner regarding undeclared labour or illegal posting (about 56% of the target population trained in 2022).
- Awareness-raising of 200 partner companies and suppliers about ethics and CSR during a Partners' Purchasing Convention organised by Bouygues Immobilier in November 2022

In practice:

The "Titanium" project was launched by the QSE department in early 2022 (and will continue in 2023) for employees that have site planning and execution responsibilities. In 2022, all technical managers were involved in this project. It aims to:

- strengthen their QSE skills through a specific assessment and coaching system; an assessment criterion on undeclared labour has been added to the Titanium criteria scorecard;
- implement targeted action plans to remedy identified non-compliant situations in operations.

Personal data breaches

Leak or breach of personal data, non-compliance with retention periods, non-compliance with consent, non-compliance with exercise of the data subject's rights

Violation of privacy, identity theft, unsolicited commercial communications

- Continued strengthening of cyberattack detection capabilities:
 - a security operations centre (SOC) brought on stream in 2022;
 - an endpoint detection and response (EDR) solution rolled out to all workstations and servers in June 2022.
- A mechanism to purge employees' personal data implemented by the payroll management provider in January 2022.
- Alert measures on the content of comments in the CRM system reinforced in March 2022.
- New contracts updated with protection clauses taking into account the Cloud Act and the decision to invalidate the Privacy Shield.
- Anonymization of personal data on test environments (applications, website) since October 2022.
- Actions to raise GDPR awareness aimed at:
 - new employees: validation of e-learning in the end-of-trial period assessment since January 2022;
 - the Development department acting ahead of the property development process to identify buildable land: e-learning completed by 78% of relevant employees in October 2022.

Key risks and description	Prevention or mitigation actions initiated or continued in 2022
<p>Breach of ethical and purchasing rules in relations with contractors</p> <p>Employees' and/or suppliers' failure to understand, or ignorance of, the ethical and purchasing rules</p> <p>Pressure on contractors to meet deadlines and costs: risk of breaching the rules to obtain results, risk of deterioration in the working conditions of employees involved in meeting deadlines and costs</p>	<ul style="list-style-type: none"> • The Group's CSR Charter for Suppliers and Subcontractors systematically appended to contracts managed by the Purchasing departments. The charter imposes certain requirements and failure to comply can lead to measures that may go as far as contract termination. • Audits on compliance with the Works Purchasing procedure in all Bouygues Immobilier regional divisions. • Continued roll-out of the list of pre-accredited partners selected on the basis of CSR self-assessments and Quality assessments of those partners. • SRM^a upgraded to better address relations with operations staff. • New communication campaign on the Gifts and Hospitality procedure; a new tool for reporting gifts and hospitality received and given by employees. • On-line ethics training, mandatory for all employees <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p>In practice:</p> <p>During the Partners' Purchasing Convention held on 15 November 2022, Bouygues Immobilier presented its compliance policy and raised the awareness of around 200 partner contractors and suppliers present about ethics and CSR.</p> </div>
<p>Inadequate monitoring of routine product suppliers (suppliers under master agreement)</p> <p>Non-compliance with the purchasing policy and regular monitoring of suppliers under master agreement; risk of inadequate vigilance with regard to respect for human rights in the supply chain</p>	<ul style="list-style-type: none"> • Significant increase in the number of master agreements with suppliers; continued assessment of all suppliers using EcoVadis and systematic monitoring of the changes in those assessments every year. <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p>In practice:</p> <p>The <i>Cœur de Vie</i> approach aims to reshape the design of Bouygues Immobilier buildings and housing to be more in tune with inhabitants' and customers' needs and uses, while at the same time addressing the issues encountered by local and regional authorities. The approach is based on a standardised building pre-design, combining "blocks" that use zero-carbon materials and products ("bathroom" block, "hall" block, etc.), with a contextualised design taking into account local environments and needs. The aim is to offer unique projects that meet the brand promise of "Life begins here".</p> <p>In this respect, the master agreements with partner suppliers have been reviewed, low carbon clauses added, work done on the environment and health reporting sheets and joint development actions taken to optimise relations with these partners.</p> </div>
<p>Health and safety</p>	
<p>Serious breach of health and safety of site workers</p> <p>Risk of death or serious injury of an employee, customer or third party on a site (e.g., fall from height, falling objects, electrocution, burial, crush injuries, moving mass)</p>	<ul style="list-style-type: none"> • Continued implementation of a health & safety plan, with information reported at a specific quarterly QSE committee meeting per region and per branch, securing of worksites and checking the effective application of the rules defined and sent to operations staff as the "security fundamentals". • Digitalisation of the customer purchasing process to mitigate site risks and approval of safe customer visits by the Health & Safety Officer. • Monitoring site accident data (customer/employee) and quarterly reporting to the Occupational Health & Safety Committee. • Introduction in 2022 of Papripact, an annual programme to prevent occupational risks and improve working conditions, including a conference on the theme of health and strengthening of communications about health issues. <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p>In practice:</p> <p>In April 2022, the QSE department organised a "world occupational health and safety day", during which Bouygues Immobilier staff were present at all worksites to give an <i>in situ</i> reminder of the occupational health and safety commitments and responsibilities.</p> </div>

(a) Supplier Relationship Management.

Key risks and description	Prevention or mitigation actions initiated or continued in 2022
Serious breach of health and safety of employees	<ul style="list-style-type: none"> • Introduction of Papripact, an annual programme to prevent occupational risks and improve working conditions.
Physical and psychosocial risks	<ul style="list-style-type: none"> • Continued roll-out of Bi-Well, a workplace stress prevention initiative. • Continued roll-out of the Quality of Working Life ("Working Differently") agreement to support employees at work (e.g. through support systems for employees who are carers or in difficulty, community action days, etc.) and new teleworking agreement. • Updating the Single Risk Assessment Report (DUER) and reporting accidents and incidents to the Occupational Health & Safety Committee. • Training site managers (employer's safety obligation, harassment and psychosocial risks) and self-assessments of buildings and sales offices. • Training "customer" teams in managing difficult situations • Poster campaign on the whistleblowing facility in work premises and on the Intranet.
Serious breach of the health and safety of building occupants	<ul style="list-style-type: none"> • Once a building is completed, measures taken to guarantee conformity of the works and the subsequent safety of the occupants, including internal controls, third-party inspections, conformity reports by the contractors that did the work. • Pro-actively reinforcing inspections and a process audit on specific aspects of the building.
Environment	
Soil pollution	<ul style="list-style-type: none"> • Implementation of the national "Trackdéchets^a" system for managing and monitoring waste; tutorials to help use the system properly and reminder of good practices in this area. • More frequent QSE checks to mitigate the risk of soil pollution by recruiting a QSE controller to carry out unannounced inspections. A waste management assessment criterion added to the "Titanium" assessment grid.
Risk of exposure to polluted ground that could affect people's health, particularly in the case of land acquired without reliable inspection reports	
Risk of environmental harm (fauna and flora ecosystems), in particular due to poor management of pollutants during siteworks	

(a) <https://trackdechets.beta.gouv.fr/>

Key risks and description	Prevention or mitigation actions initiated or continued in 2022
<p>Climate change</p> <p>Contributing to the increasing concentration of greenhouse gases through urban development and construction activities and use of products and services</p>	<ul style="list-style-type: none"> • A strategy drawn up and rolled out by the Climate department. • Application for SBTi endorsement of Bouygues Immobilier's carbon reduction plan drawn up and submitted in late 2022. • Projections for decarbonisation of residential districts, housing and offices. • Certification of the average carbon intensity value of multiple-dwelling housing by external inspection firms (Pouget Consultants and Tribu Energie). • Implementation of the <i>Cœur de Vie</i> approach for housing and the <i>Bureaux Généreux</i> (generous office) approach for office buildings in compliance with the RE2020 environmental regulations and in anticipation of the 2025 thresholds, supported by the signature of partnerships on zero-carbon products (bio-based paints, heat pumps, recycled glazing, low-carbon concrete, wood-concrete, etc.). • Introduction of an indicator measuring CO₂ intensity per m² of surface area for housing, offices and districts (low-carbon calculator) and RE2020 monitoring committee. • Process to improve the carbon performance of projects designed before the RE2020 regulations came into effect
<p>Increase in frequency and intensity of weather events, posing a risk of damage to buildings and personal safety</p>	<div data-bbox="602 680 1495 840" style="border: 1px solid black; padding: 5px; margin-bottom: 10px;"> <p>In practice:</p> <p>At the end of 2022 Bouygues Immobilier created <i>Nouveau Siècle</i>, a subsidiary that focuses on renovating listed and landmark buildings. It is committed to preserving the heritage and architectural value of old buildings while seeking to achieve energy performance targets over and above the minimum regulatory requirements.</p> </div> <ul style="list-style-type: none"> • 2022-2023 energy efficiency plan: 10% reduction in energy use at administrative sites (offices: head office and 33 branches, marketing spaces) by 2024. • Continued awareness actions: over 50% of employees had taken part in a "<i>Fresque du Climat</i>" workshop by the end of 2022. • Continued improvement in the expertise of engineering and design staff in implementing decarbonisation solutions for housing and office projects • As regards weather events: <ul style="list-style-type: none"> ▪ availability of "flash warnings" in case of weather event risks (for example, high winds, heat wave, etc.); ▪ targeted communication by e-mail or at monthly regional management committees based on weather forecasts.
<p>Biodiversity collapse</p> <p>Risk of destroying protected species, habitats and ecological continuity and risk of pollution due to the design and construction of a property project.</p> <p>Risk of flooding following soil sealing</p>	<ul style="list-style-type: none"> • The <i>Cœur de Vie</i> approach systematically includes exterior spaces designed in conjunction with an environmental engineer to promote biodiversity. • Signature of five national master agreements with environmental engineers to help systematic implementation of the environmental analysis approach for all projects as soon as the land has been acquired. • 31 projects have obtained or are in the process of obtaining the "BiodiverCity" label, which is awarded by International Biodiversity and Property Council (IBPC) and certifies that measures are taken to consider biodiversity issues at the various stages of a property development project. • Top place in the 2022 <i>Maître d'ouvrage mobilisé</i> ("committed project owner") awards and since the label was first introduced. • As regards new property developments: <ul style="list-style-type: none"> ▪ Biodiversity preservation indicators and objectives included in the decision-making processes ahead of the design stage; ▪ "Flash" environmental assessment conducted at all sites; ▪ A minimum target biotope area factor set for all projects as of the design stage; ▪ "Uses, landscape and biodiversity" specifications applied to projects. • For property developments where the design stage has already begun, case-by-case review of the possibility of including the flash assessment, minimum target biotope area factor and uses, landscape and biodiversity specifications. • 95% of employees received training in biodiversity issues in 2022.

Action plans and areas for improvement

To address the risk of undeclared labour or illegal posting of workers, Bouygues Immobilier intends to:

- continue the "Project Owner's Responsibility" training; and
- take these issues into consideration when drawing up the "Low-Disturbance Construction Site" Charter in 2023. The Charter will apply to all Bouygues Immobilier sites with a view to harmonising and improving the quality of their monitoring. It will help to reaffirm the fundamental principles of site organisation, choice of products and materials, waste management, preservation of the natural habitat, demolition, water and energy use, pollution and disturbances.

Bouygues Immobilier plans to take several measures to mitigate the risk of personal data breach:

- in the CRM tool, manage property owners' consents in connection with urban development activities and the process of anonymising their personal data;
- conduct a new communication campaign on the GDPR and cybersecurity awareness e-learning modules;
- continue to improve cyberattack detection capabilities and test cyberattack resilience mechanisms; and
- digitalize third-party assessment tools.

Regarding compliance with ethical and purchasing rules in relations with contractors and suppliers, Bouygues Immobilier intends to take the following action:

- roll out a purchaser behaviour module to new employees involved in works purchasing; and
- roll out the SRM enabling data and therefore practices to be analysed.

To address the risk of serious breach of health and safety of people on worksites and future housing occupants, Bouygues Immobilier will continue its health & safety plan and perform safety inspections on worksites. The

"Titanium" project will continue in 2023 for employees that have site planning and execution responsibilities.

Regarding serious breach of the health and safety of employees, Bouygues Immobilier will continue to train site managers, provide regulatory safety training and overhaul the training programmes for sales staff on managing difficult situations.

As regards soil pollution, QSE worksite inspections will be strengthened and the Waste policy and related tools will continue to be rolled out.

To address climate change issues, Bouygues Immobilier intends to:

- continue adapting its carbon reduction targets and action plans at local level (region/branch/subsidiary);
- improve the carbon reporting and accounting process;
- continue to improve employee skills through various workshops (*Fresque du Climat*, 2 tonnes, *Fresque de l'Économie circulaire*, etc.);
- set up working groups on restoration and redevelopment; and
- roll out the energy efficiency plan.

Lastly, regarding biodiversity collapse, the following actions are planned:

- continue general training for all new employees;
- roll out a specific module for technical managers responsible for monitoring siteworks;
- introduce contractual obligations for garden management;
- develop indicators to assess the use of green spaces on biodiversity criteria; and
- by 2025, sustainably achieve the target of 25% of the total surface area of projects under development having larger areas promoting biodiversity than offered by the initial site.

4.3.3 Colas

Governance

Colas has a dedicated duty of vigilance committee jointly run by the CSR and Legal departments and including representatives from the Environment, Health & Safety, Human Resources, Purchasing and Internal Audit departments. The methods for analysing and mapping risks are defined at Colas group level and action plans are determined and rolled out by the Colas geographical entities and BUs^a.

Colas' vigilance plan is part of the ACT^b project, which sets out the eight CSR commitments Colas will make to its stakeholders out to 2030. The risks and actions described below have been presented to Colas' Chief Executive Officer.

Risks and actions taken

The specific actions taken to address identified risks are described in the table below.

(a) Business Units.

(b) Act and Commit Together.

Key risks and description	Prevention or mitigation actions initiated or continued in 2022
<p data-bbox="168 226 532 247">Human rights and fundamental freedoms</p> <p data-bbox="168 254 545 306">Discriminatory practices (ethnic, gender, religious, geographical discrimination, etc.)</p> <p data-bbox="168 317 574 426">Discriminatory practices towards an employee based on ethnic, social, religious, political, gender, geographical or physical (e.g. disability) criteria.</p>	<ul style="list-style-type: none"> • Rolling out an initiative to promote diversity as part of the Colas CSR commitment to "Attracting, developing and retaining talents through managerial excellence", based on an action plan supported by senior management. Actions include: <ul style="list-style-type: none"> ▪ signature in France in 2022 of an agreement on diversity, inclusion and equal opportunity at group level, after negotiations with the employee representative partners; and ▪ an action plan on diversity drawn up in 2022 by each business unit. • Local policies rolled out in each entity focusing on diversity, equality and inclusion such as the "Be Fair" programme in the United Kingdom, "Diversity, Equality and Inclusion" Policy in Canada, salary benchmarking tools to avoid potential discrimination in Morocco, Central and West Africa, and Colas Rail France's collaboration with GEIQs^a and with non-profits that promote the inclusion of former prisoners. • Partnerships with <i>Elles Bougent</i> (France, Europe and Africa) and "Women Into Construction" in the United Kingdom to help make jobs in the construction and civil works industries more accessible to women; supporting female employees through managerial leadership programmes or networking ("WIN – Women's Initiative" in the United States, "We By" Colas Rail). • Rolling out the "Living together in diversity" on-line training in France and internationally to prevent the risk of discrimination (gender, age, background, disability, religious beliefs, trade union membership, sexual orientation), mandatory for all managers. Over 1,000 people have been trained. • A master class on inclusion and diversity attended by the 700 senior managers present at the Colas in Motion CSR convention held in May 2022. • A second edition of the "Dialogue" internal survey initiated in 2021 among all Colas employees. It includes sections on diversity and inclusion and is available in 18 languages and 44 countries. • To promote the recognition and inclusion of people with disabilities, working environments are adapted as best possible to cater for various disorders in the agreement on quality of life and working conditions signed in May 2022 and in a communications campaign entitled "Let's talk about well-being at work". • Liaison officers reappointed in France to fight sexual harassment and sexist behaviour, with plans to extend the network outside France. • Training for Human Resources managers and liaison officers responsible for fighting sexual harassment and sexist behaviour, including a reminder of the zero-tolerance policy. • Formal process for dealing with situations of discrimination and psychological and sexual harassment drawn up by the Human Resources and Legal & Compliance departments, supported by awareness campaigns on its scope of application. A hotline for socio-psychological help and support in France and various other countries (USA, Canada) available 24/7 to provide advice or direct the employee to someone with the right expertise.
	<p data-bbox="589 1287 688 1308">In practice:</p> <p data-bbox="589 1325 1492 1377">In 2022, Colas joined the #StOpE initiative that aims to fight casual sexism in the workplace, thus demonstrating a strong managerial commitment to promoting a respectful working environment.</p> <p data-bbox="589 1394 1492 1472">In the United Kingdom, Colas UK introduced its Be Fair programme, aimed at victims of discrimination at work. Be Fair has a "Strategic" accreditation level (4th of 5 levels) recognising its commitment to fairness, inclusion and respect. Actions include:</p> <ul style="list-style-type: none"> • a reverse mentoring programme on discrimination against women, in which women can make men aware of discriminatory practices and ways to prevent them. • as regards disability inclusion, Colas UK aims to obtain Disability Leaders accreditation in 2023 to strengthen its commitment, having obtained the Disability Confident Employer label in 2017.

(a) Groups of employers that work to integrate and train people without mainstream access to the job market, through work/study contracts.

Key risks and description

Prevention or mitigation actions initiated or continued in 2022

Non-compliance with national and international labour laws regarding local and/or migrant employees

Non-compliance with national and international regulations on local and/or migrant workers (undeclared labour, excessive working hours, retention of identity papers, abusive recruitment practices, forced labour or employment of people below the legal age, etc.)

- Continued digitalisation of pay and working hours monitoring systems, including the use of new payroll tools on the new "Colasway" HR information system and training of payroll managers.
- Monitoring the hours spent on worksites reported by site managers and computerised mechanisms for checking working hours.
- Digitalisation of "security" tools on sites and worksites in at-risk areas, for example to prevent identity theft on worksites.
- HR departments of relevant countries oversee recruitment processes (including seasonal or temporary workers).

In practice:

Some entities (France and Canada for example) have a "right to disconnect" policy which has led to practical measures to make employees aware of excessive or late working hours. Specific messages are included with e-mail signatures and awareness-raising actions about this issue are taken in line with actual local conditions.

Inadequate working and housing environment (work equipment, health and safety conditions in camps/sites and living quarters, etc.)

Risks to an employee's health and safety due to an inadequate working and/or housing environment at sites, camps and living quarters (inappropriate work equipment, food, health and safety conditions, external or internal threats, including physical harm and sexual or psychological harassment)

- Signature in France of two agreements, one on the quality of working life in 2021 and the other on teleworking in 2022. These agreements apply to the France scope and are due to be extended internationally based on local specifics and conditions.
- Annual "Dialogue" survey including questions on well-being at work in order to devise appropriate solutions tailored to the business segment and geography.
- Continued improvements to living conditions (fixed and mobile sites) and site equipment, notably following quarterly management inspections of facilities and large sites.
- Continued audits of health standards and compliance work on worksite cabins, standardisation of facilities at major sites.
- Systematic risk analysis, in particular safety risks at site facilities, when contracts are awarded (at area level or according to contract amount).

Non-compliance with local minimum wages and benefits (pension, benefit allowances and social security)

Pay and benefits practices in breach of local or international standards or Colas rules (minimum wages, management of contractual terminations, pensions, benefit allowances, access to health cover, family conditions or constraints: pregnancy, sick child, help for employee carers, etc.)

- A pay policy providing employees with a fair overall pay package, adapted to the specifics of the business activities, profiles and geographies (unemployment rate, inflation and job market conditions in the civil works sector) and giving employees a share of the company's profits.
- Continued action by the Compensation & Benefits department (grading of salaries at global level using the Hay method, indicators to track pay and benefits, etc).
- Higher increases in salaries and bonuses paid to over 70% of employees to take account of inflation and tensions in the job market, in consultation with the trade unions.
- Local surveys (central and western Europe, the UK and Ireland) to propose attractive pay packages and retain and attract talents.
- Introduction of standard minimum employee benefits (BYCare programme) following an identification and global mapping process (death, sickness and disability, healthcare, accident, pension, maternity) aiming to provide a set of standardised benefits based on good practices in all countries where Colas employs people.

Key risks and description

Prevention or mitigation actions initiated or continued in 2022

Health and safety

Workplace accidents on site or during travel

Increase in workplace accidents (machinery/pedestrian collisions, falls, mechanical accidents such as struck-by, pinch point, crush and handling injuries, electrical accidents such as electrocution or burns, etc.) causing bodily injury or death on sites

- The Health & Safety department relies on a global network of safety managers in place for several years to implement the health & safety policy. They have a large array of prevention tools including safety training and shared operational processes and tools on a multilingual platform (Colas Share), which also helps to spread best practices.
- To address the Zero Accident goal, continued implementation of the One Colas Safety cultural change programme, which comprises the Goal Zero programme in North America and One Safety in France and French-speaking Europe, with a network of about 40 internal coaches already trained.
- Some 30 specific audits performed by a unit created within the Health & Safety department to formally identify five ways to improve the health & safety culture and protect the health of employees working in the field (support for operations staff and knowledge sharing; harmonisation of practices; technical information and human skills sharing; digitalisation of reporting and information processes; improvement of the health & safety culture).
- Rolling out the Colas Safety Rules (comprising five "life rules" and twelve "lifesaving rules"). Adjustments are made to comply with local laws. The rules have also been disseminated to temporary workers on worksites and in offices.
- To support employees in health matters, these actions have been taken on worksites and other premises:
 - on-site availability of nurses and doctors, for example in Madagascar and Ivory Coast, to provide care for employees and administer first aid. In Morocco and Benin, the same type of support is provided under medical assistance agreements with local clinics;
 - a "safety induction" process for all new arrivals and for people going to work on a site;
 - regular routines (task meetings, health/safety issues & prevention methods, Starter & Safety Meetings, etc.); and
 - creation of a working group in France focusing on road construction site safety.
- Systematic safety training (new arrivals, site management, site workers, health and safety officers).
- Fatal accident monitoring committee meeting held after every accident, including management representatives of both Colas and the relevant entity, to analyse events and identify the causes and the appropriate actions in response. The conclusions are widely disseminated to remind everyone of the watch points, best practices and instructions to be observed and to ask each entity to take similar remedial measures.
- Digitalisation of processes and tools for better oversight of health and safety performance:
 - digitalisation of health and safety reporting and One Colas Safety/Goal Zero reporting (in particular the number of workplace accidents) for more in-depth root cause analysis and monitoring of prevention actions;
 - improvement in sharing health and safety documents (using "Colas Share HPS") and best practices for smooth access to information in several languages.
- Crisis management policy updated, backed by training & drills on health/safety scenarios or health events.
- Annual Safety Week (2022 campaign theme: distractions while driving)
- Continued global roll-out of a road safety action and prevention programme led by the Insurance department (appointment of a Road Safety Officer in each subsidiary with over 400 road safety managers responsible for implementing and coordinating the programme). In France, this has led to a four-pronged approach: raising awareness about the rules of safe driving (training, post-accident analysis, driving audits, etc.), organisation of business travel, fleet management (purchase, maintenance, safety equipment, etc.), and the environment (road infrastructure, traffic plans, etc.). Similar programmes are also being rolled out in several countries.

In practice:

In the United States, a triage service called Ortholive has been launched so that all employees get the best possible treatment, even for minor incidents. Employees have access to medical advisors in more than 50 languages.

In Europe, Spac has launched an innovative neuroscience-backed prevention programme related to human factors as part of its safety drive. The aim is to fight force of habit by getting people to understand the importance of a successful start to the day and of taking regular breaks enabling them to switch off for a while and come back more aware of their working environment and its dangers.

Key risks and description	Prevention or mitigation actions initiated or continued in 2022
<p>Exposure to occupational diseases</p> <p>Increase in occupational diseases due to inadequate or hazardous working conditions (exposure to chemicals, toxic products, radiation, etc.)</p>	<ul style="list-style-type: none"> • To address risks with a human and environmental impact, two expert employees in Environment and Safety work on health and safety issues (measuring asphalt smoke, silica dust, volatile organic compounds, etc.) • Process whereby chemical risk assessments performed by each Colas entity are systematically sent to the relevant departments. • A regular "safety induction" process for all new arrivals and for people going to work on a site. • Maintenance and standardisation of protection mechanisms used at operational sites: <ul style="list-style-type: none"> ▪ installation of collective protection systems (e.g., sprinklers to capture dust at source); and ▪ distribution of specific PPE^a according to the chemical risk. • Continued training in correct posture and movement to reduce the risk of occupational disease.
<p>Epidemics/pandemics (Covid-19, swine influenza, avian influenza, Ebola, Zika, etc.)</p> <p>Rapid spread of an epidemic, pandemic or infection on a regional or international basis, affecting employee health and continuity of operations</p>	<ul style="list-style-type: none"> • Epidemics or infections and diseases specific to certain geographies are included in local Colas prevention plans and employees travelling on business are notified through information sheets on safety risks in the relevant countries. • Regulatory intelligence and appropriate adjustments made by local entities for optimum roll-out of prevention/protection actions, in line with Colas guidelines. These include: <ul style="list-style-type: none"> ▪ materials related to protocols and recommendations for worksites and offices (on-site posters and starter documents, awareness kits, PPE, CPE^b and disinfectants, distancing, etc.) updated in line with changes and information issued by the local authorities. ▪ business continuity plans deployed as part of the crisis management procedure. • Continued action to protect employees and ensure business continuity during the Covid-19 pandemic (reactivation of the multidisciplinary crisis management task force when a deterioration in the health situation dictates, Covid 19 follow-up app for contact tracing and identifying at-risk areas, enabling Covid HR and Safety Officers to analyse real-time data).
<p>Sudden deterioration in the safety situation in a country</p> <p>Political risk, riots, terrorist threats, kidnapping, malicious acts, crime, intrusion directly or indirectly targeting Colas employees, assets or sites and those of one of its suppliers, service providers or customers</p>	<ul style="list-style-type: none"> • The Health & Safety department heads a network of Security Managers based in each country to protect employees during their international travel or postings. • Regularly updating the risk matrix and Master Security Plans (MSP) drawn up by the Health & Safety department and made available to the local entities. • Continuous monitoring system with various service providers, shared with the Security network and employees travelling on business. Digitalisation of "security" tools on sites and worksites in at-risk areas, for example systems to prevent identity theft on worksites and Personnel On Board/Personnel On Site (POB/POS) software that automatically provides lists of all people present in a country or on a particular project. Providing employees travelling on business with awareness sheets on the security risks in the various countries of operation and updating the sheets regularly. A smartphone app has also been made available (Global Travel Solution). • Widespread use of Meet & Greet procedures in sensitive areas under the responsibility of local correspondents. • Audits performed at operations sites or site accommodation. • A standardised risk analysis and a "general security plan" used for new projects to protect people and assets in those new operational areas. • Regularly updating the crisis management procedure for kidnapping, detention and riots and disseminating information sheets listing the essential actions to be taken in emergency situations. • Stress and conflict management training in France to address the rise in rude behaviour and limit exposure to the risk of physical aggression.

(a) Personal protective equipment.
 (b) Collective protective equipment.

Key risks and description

Prevention or mitigation actions initiated or continued in 2022

Environment**Major industrial risks (impacts on the environment, health and safety)**

A major industrial accident (explosion, fire) or other event arising from specific operations (Seveso facilities, environmentally-classified facilities, presence of explosive products, liquids or gases, pressurized pipes, etc.) could occur on a site or worksite or its surrounding area

- Governance system for this risk reorganised to ensure (i) sharing of responsibilities for the prevention of and response to occurrence of an accident between the Environment, H&S, Equipment, Technical, Internal Audit and Insurance departments, and (ii) feedback of information from the field to the parent company, and to provide a framework for analysing accidents.
- Accident reporting organised through a dedicated e-mail address, systematic analysis of events and appropriate response taken by on-site operations staff.
- A video circulated to the environment network to help identify undesirable events and causes leading to the occurrence of these risks.
- Updating recommendation fact sheets on industrial risks to include clarifications on the prevention of fire involving dust collectors or asphalt plants, the prevention of accidents involving storage tanks and the explosion of emulsion tanks, etc.
- Action plans for certain sites identified on the basis of criteria such as storage and use of hazardous materials, use of sulphur, Seveso sites, etc.
- Sharing feedback from an industrial risk committee comprising the Equipment, Technical, Environment, Safety and Risk, Insurance and Internal Audit departments.

Water and soil pollution

Temporary or irreversible, gradual/chronic or accidental water or ground/underground contamination or deterioration caused by accidental discharge of effluents, non or poor treatment of effluents, or legacy or neighbouring pollution

- An "environment network" has been run by the Environment department for more than 20 years. This network has acquired expertise in environmental management and the relevant regulations and standards, and supports the operations staff in implementing them.
- Overhaul of the process for collecting "environment" checklists used for environmental self-assessment of Colas fixed sites (quarries, asphalt mixing plants, emulsion plants, workshops, laboratories, etc.), more specifically monitoring the implementation of Colas standards on technical water/ground protection systems to counter any impact from its operations (soil sealing, effluent management, specific requirements of retention installations, etc.)
- Monitoring indicators on control of aqueous waste or accidental spillage.
- Use of environmental audits based on three levels to cross reference information and exploit areas for improvement, mainly by sharing best practices. Internally, audits are performed by the QSE manager of each entity, and cross audits are organised between entities. Externally, audits are performed by specialist firms on non-financial regulations or as part of the certification process to complete the system.
- Audits performed at 15 sites by end-2022 based on industrial risk criteria such as storage and use of hazardous materials, Seveso sites, use of sulphur, etc., to measure gaps against regulatory requirements, and adapt action plans where necessary.
- QSE departments approve the Safety information sheets for chemical products in purchasing master agreements before they are published in the catalogues available to operations staff or before their use.
- Roll-out of a specific e-learning module focusing on water and ground pollution.

In practice:

The environmental audit approach is now being rolled out internationally, particularly in Canada where it was trialled in 2022 with the creation of a network of some 20 auditors and around 10 audits performed in all the Canadian subsidiaries. This successful trial will enable the audit approach to be rolled out in other Colas geographies in 2023.

Key risks and description

Climate change

Impact of activities on the climate:

Contribution of Colas operations, facilities or value chain to greenhouse gas emissions

Impact of the climate on activities: direct or indirect exposure/vulnerability of operations to climate change phenomena in terms of business disruption, resilience to extreme weather events, human and financial impacts

Prevention or mitigation actions initiated or continued in 2022

- Senior management supervision and coordination of low-carbon action plans and investments:
 - at Colas group level, through a "Low Carbon" strategy committee and strong senior management involvement in certain flagship and innovative projects;
 - in each geographical Business Unit, sponsors are identified to manage these initiatives.
- Continued implementation of a low-carbon strategy roadmap to reduce Colas' greenhouse gas emissions by 2030 (action on direct and indirect emissions related to the value chain).
- The roadmap comprises six priority areas and 29 commitments coupled with 20 KPIs measured, to meet two goals:
 - a 30% reduction in carbon emissions for the Colas group by 2030 across scopes 1, 2 and 3a. This commitment has been certified by the SBTi;
 - specific commitments for Colas Ltd have an earlier target date (2040 instead of 2050) to meet customer requirements, with a 1.5°C-aligned pathway.
- Four priority areas have been defined for implementing the roadmap through practical actions involving both operations staff to provide technical solutions, and the support departments to roll out measurement and training tools.
 - Priority area 1: Commercial development and employee awareness:
 - analysis of the sensitivity of Colas' business model to climate change;
 - awareness and training actions through *Fresque du Climat* workshops throughout the group and a dedicated "low carbon" module available on the in-house Colas Campus training platform.
 - Priority area 2: Actions to reduce the carbon intensity of direct emissions: adding the carbon criterion to the investment process and incentives to reduce the energy consumption of sites.
 - Priority area 3: Technical department actions to design a set of solutions aiming to reduce CO₂ emissions: eco-comparison tool to maximise project eco-friendly alternatives, conventional mixes replaced by warm, semi-warm and cold mixes, production and purchase of low-carbon concrete, transition to low-carbon vehicles, heavy machinery and equipment fleet by seeking alternatives to fossil fuels (electric, biogas, green hydrogen, etc.), research and development work to fight urban heat islands, etc.
 - Priority area 4: Work on purchasing and carbon accounting:
 - Implementation of a supplier maturity analysis to steer the subcontracting and supply chain process towards low-carbon solutions;
 - Revision of the carbon accounting methodology based on all physicals flows and expenses recorded in the financial information systems (Scopes 1, 2 and 3a).
- Upgrade of digital tools to provide employees with action monitoring dashboards related to the non-financial consolidation reporting tool.

In practice:

Colas has developed a tool called Colas Carbon Counter, which automatically calculates the carbon footprint of a worksite as it progresses and upon completion, and then prints out a report for the customer. It comprises recognised certified national and international databases and calculations are based on worksite expense data retrieved automatically from the financial systems combined with appropriate emission factors. The Carbon Counter, which was first used at the low-carbon branches, is now available in France and is also being trialled in the United Kingdom. In time, it will be used to perform a quantitative analysis of greenhouse gas emissions by worksite type.

Key risks and description**Impact on biodiversity**

Temporary or irreversible harm to biodiversity of the surrounding ecosystem and species. This may be caused by Colas' activities (disturbances, vibration, lighting) or by accidents (pollution) or more broadly by contributing to land take causing harm to ecological zones or corridors

Prevention or mitigation actions initiated or continued in 2022

- Continuing the biodiversity policy for quarries and gravel pits consisting in developing and fostering ecological niches at Colas extraction sites by protecting noteworthy species or installing beehives. This policy is due to be extended to all facilities depending on the specifics of each site.
- Rolling out a training module intended for all employees.
- Providing environmentally themed fact sheets enabling employees to take practical action in favour of biodiversity at sites and worksites. A KPI is measured at all sites to ensure that at least one action to protect biodiversity is taken by all sites. In 2022, over 180 sites took at least one action to promote biodiversity, with scientific and educational support for local populations (local residents and employees).
- Fighting the spread of invasive exotic species at sites and worksites: a species management approach is currently being tested with an external partner to identify appropriate measures to address the issue at each site.
- Continuing local partnerships with the French National Forestry Office (ONF) and the French Bird Protection League (LPO) and other local non-profits (Life in Quarries, WCS, regional natural parks) to limit the impact of activities on ecosystems. For example, Colas is continuing its partnership with Kinomé Forest and Life, combining biodiversity preservation actions with an educational programme founded by Canopé and Kinomé. The aim is to take part in reforestation projects by involving schoolchildren in planting trees in France and Ivory Coast.

In practice:

The 2022 Environment Day, held on 8 June 2022, was dedicated to biodiversity, with various materials prepared for discussion and exchange at the sites and worksites. Biodiversity workshops were also held.

Scarcity or temporary or permanent shortages of resources, commodities or energy

Scarcity or temporary or lasting shortages of a natural resource, commodity or energy requiring adaptation of production processes or the supply chain (circular economy, including reuse of materials) which could jeopardise the viability of certain operations

- Colas' commitment to "promoting circular economy solutions to preserve natural resources". This commitment is founded on four priority areas:
 - Priority area 1 - Integrating circular economy issues throughout the Colas group, in particular by raising employee awareness. Actions include:
 - organisation of a master class during the Colas in Motion CSR convention;
 - organisation of a Colas Forum conference on the circular economy during sustainability week, with a keynote speech by the head of the French National Circular Economy Institute;
 - raising awareness about everyday actions: limiting single-use plastics, collecting waste around worksites and other community actions, etc.
 - Priority area 2 - Recycling materials through research and development:
 - work and research on recycling waste and deconstruction materials from the construction and civil works or other industries (marine sediments, used cooking oil recycled into new asphalts, etc.) to limit waste production and transport of materials;
 - shareholding in Ecominero, which aims to implement extended producer responsibility under the Agec law. The goal is to increase the inert waste recycling rate to over 90% by promoting waste sorting and free disposal.
 - Priority area 3 - Developing recycling platforms and their uses:
 - developing a network of materials recycling plants. Over 400 Colas sites (fixed and mobile recycling plants) process second-life materials to make materials for use in civil works projects;
 - in 2022 Colas recycled 11.4 million tonnes of materials in its plants and an average of 17.5% of Colas' total production of warm asphalt mixes was derived from recycled used road pavement;
 - implementation in France of an approach to improve site visibility and the quality of services regarding collection of materials, traceability and reusable materials.
 - Priority area 4 - Proposing circular economy solutions to customers. For example, production of asphalts that include recycled materials, prolonging the life of roads, road rehabilitation, etc.

In practice:

In 2022, as part of the Global Circular Economy chair co-founded by the Bouygues group, Colas had a group of students working on rolling out actions to increase the percentage use of recycled road pavement.

In 2022, Colas also launched its Valormat and Ecotri centres across France, proposing two new services for construction and civil works operators. To date, 160 waste collection centres have been identified. In time, Colas plans to increase its production of recycled materials by 50% by 2026.

Purchasing department's response

- In response to the risk of non-compliance with CSR commitments by third parties (suppliers, service providers and subcontractors), the Purchasing department has brought together a number of departments across the group to focus on CSR issues.
- A formal roadmap has been drawn up based on four priority areas to meet the specific responsible purchasing commitment "Building a responsible supply chain based on sustainable performance":
 - Priority area 1: Train all purchasing staff in CSR and make them accountable;
 - provide educational materials to raise the awareness of all purchasers, combined with a specific on-line training module. This training has been adapted and rolled out on a global level and has been completed by all purchasers. It is also available to all new arrivals.
 - Priority area 2: Build a "CSR Purchasing" action plan;
 - in 2022, Colas launched a training programme for its partners and purchasers to improve their knowledge of low-carbon product alternatives. Depending on country size, the goal is to train and support over 50 suppliers within a year, and help them to draw up and monitor plans to reduce their product's carbon footprint.
 - Priority area 3: Ensure that suppliers comply with Colas' CSR commitments, based on the outcome of the CSR purchasing risk mapping process.
 - continued control measures (including ethics clauses in orders and contracts, appending the CSR Charter for Suppliers and Subcontractors, audits, etc.), systematic EcoVadis assessments on suppliers considered as priority (Top 50 or 20 depending on the entity as of 2023), and strengthening supplier and subcontractor awareness initiatives (presentation of the low carbon roadmap during Supplier Days, etc.). The ultimate goal is to include CSR and carbon performance criteria in calls for tender.
 - Priority area 4: Ensure that Colas complies with its CSR commitments to suppliers (economic reliance and compliance with payment terms).
- Reworking the Purchasing CSR risk map to facilitate its roll-out to and buy-in by the operational entities. This should enable the Purchasing departments to perform duty of vigilance related risk assessments across the subcontracting chain using the same reference base as that used for Colas group activities.
- Digitalisation of Purchasing tools and supplier monitoring for better supply chain traceability: development of a supplier management system (assessment, accreditation); dashboards for monitoring actions taken under the specific responsible purchasing CSR commitment.

Action plans and areas for improvement

In 2023 Colas will continue to roll out the ACT project's eight CSR commitments based on the following four priority areas:

- Creation of an associated governance system in the entities and definition of local CSR action plans with the introduction of minimum CSR standards;
- Training and awareness-raising using the various tools made available by the CSR department (webinars, CSR self-assessment pack, ACT Starter pack, etc.);
- Roll-out of a CSR action plan monitoring tool common to the entire group;

- Roll-out of a new non-financial reporting tool combined with the introduction of CSR KPIs.

The ACT project's four roadmaps that more specifically cover duty of vigilance issues will continue to be rolled out and monitored in the CSR action plan tool.

The new CSR risk map will be rolled out in Colas group geographies/businesses using a digital tool designed to help each entity take ownership of this approach. Known as "Colas Map" and already used for corruption risk mapping, this digital approach will give the entities the benefit of similar tools (list of risks, assessment scales, etc.) to identify and assess risks across their own scope.

4.3.4 TF1

Governance

TF1 has a vigilance plan monitoring committee supported by a network of liaison officers mainly comprising representatives from the CSR, Internal Control, Compliance and Legal departments, as well as risk contributors and managers (Purchasing, Human Resources and DPO). A project team has been set up to monitor progress in actions identified.

The vigilance plan is approved annually by the TF1 group's Compliance Committee (which comprises the Ethics Officer, head of Human Resources and Chief Financial Officer) and its Board of Directors.

Risks and actions taken

Specific actions are taken to address the risks identified in the table below.

Key risks and description	Prevention or mitigation actions initiated or continued in 2022
Human rights and fundamental freedoms	
Discriminatory practices (ethnic, sexual, social, etc.) Discriminatory practices towards a permanent or temporary employee based on ethnic, social, sexual orientation, gender or physical (e.g. disability) criteria.	<ul style="list-style-type: none"> • Presence of liaison officers to combat sexual harassment and sexist behaviour, mandatory training on casual sexism for all employees; since 2020 TF1 has been a member of the #StOpE initiative to fight casual sexism in the workplace. • An external discrimination hotline called "Allodiscrim" available to employees, aiming to improve information and advice given to employees on what to do if they have been a victim of discrimination or unfair treatment. • Specific measures taken to promote inclusion: adoption or second parent leave granted to LGBTQIA+ employees who become parents, including by surrogacy. • Training in "recruitment without discrimination" for the Human Resources departments and managers involved in the recruitment process, "fighting disability stereotypes" for elected representatives and "gender balance and stereotyping" for all employees. • Since 2022 inclusion of LGBTQIA+ issues in the topics addressed by the Fifty-Fifty internal network. • Renewed signature of "The Other Circle" LGBT+ Charter in June 2022 to reaffirm TF1's commitment to inclusion of all employees and in particular its aim to fight discrimination related to sexual orientation and identity. TF1 was the first group to sign this charter in October 2015.

Key risks and description

Prevention or mitigation actions initiated or continued in 2022

On-set harassment

Inappropriate behaviour towards filming or production staff (Newen, TF1 Production). In response to and to curtail this type of incident on production sets, the CNC^a has introduced mandatory training for all producers who apply for financial support from the CNC for their film or TV productions.

- Mandatory e-learning on "Everyone against sexism" for all TF1 employees.
- Works Council "Harassment and Violence at Work" liaison officer responsible for fighting violent behaviour at work (sexual or psychological harassment, sexist behaviour, etc.).
- Procedure for identifying and dealing with harassment and violence at work, which is appended to the internal rules and describes the parties involved and method of investigating potential harassment.

In practice:

Besides the CNC training referred to above for producers, Newen's Human Resources department has, for example, rolled out its own awareness-raising measures among staff directly concerned. Newen wished to go further than the CNC training for producers and required all heads of daily soaps to undergo training. This training was also made available to the rest of the staff on a voluntary basis. It was given by the General Delegate and educational officer of the European Association against Violence against Women at Work (AVFT). A total of some 100 employees received the training. In addition, all call sheets for a Newen production now include the hotline number for making complaints and seeking advice and the contact details of two designated liaison officers appointed within Newen.

Violation of human rights by suppliers and subcontractors from whom the group purchases programmes, TV content, services or products for resale

Violation by suppliers and subcontractors of international labour standards (undeclared labour, abusive subcontracting, illicit supply of workers, pay levels, discrimination, child labour, forced labour, hazardous working conditions, violation of freedom of association and right to collective bargaining)

- Requirement for suppliers and subcontractors to make contractual commitments ("Ethics and Compliance" clause).
- Responsible purchasing" guidelines drawn up by the Purchasing department including:
 - assessment of the environmental and social performance of suppliers using the EcoVadis scorecard, and an action plan required from those with an unsatisfactory score;
 - completed CSR questionnaire (self-assessment of social, human resources and environmental issues) required from all suppliers responding to a call for tender from the Purchasing department;
 - identification of contracts for which "socially responsible" purchases can be expanded (e.g., 2020-2022 agreement with the trade unions for the inclusion and ongoing employment of people with disabilities, TF1's priority on disability and inclusion to be included in tender documents, the CSR questionnaire to contain social criteria related to disability and inclusion, promoting purchases eligible for co-contracting for bids submitted with a company in the disability sector).
- Renewal of the "Responsible Supplier Relations & Purchasing" label.
- Rights acquisition agreements for programmes subsidised by the CNC to contain a requirement for producers to complete the CNC's training on the prevention of sexist and sexual violence, with specific clauses to be included in the agreements (insurance clause requiring third-party liability insurance and "social" clause) and stronger support for producers involved in the more sensitive programmes to ensure compliance with the legal and regulatory framework (prior authorisation from Dirrecte when underage children are involved, compliance with Arcom rules, etc.).

Violation of human rights when broadcasting programmes, content or TV news reports

Broadcasting of TV news reports, advertising, documentaries, programmes or content that do not comply with the content ethics or the rules on children's programmes or which flout the CSA's^b ethical principles, image rights, right to privacy, presumption of innocence, safeguard of public order, information ethics, etc.

- Regarding advertising:
 - TF1 Publicité takes part in the ethics and compliance framework within ARPP^c and the main industry organisations (*SNPTV-Syndicat National de la Publicité Télévisée, Centre d'étude des supports de Publicité, EDI Pub*); and
 - ARPP's opinion is sought before broadcasting any TV advertising or on-demand media services to ensure that its advertising complies with ARPP regulations and code (provisions on dignity, stereotyping, ethnic or religious references, etc.).
- Regarding TF1 children's programmes (the Tfou Max VoD service):
 - all children's series purchased viewed by a child psychologist and upstream collaboration with the artistic team for series co-produced by TF1, and
 - content and community site moderation.

(a) the French National Centre of Cinema.

(b) Now Arcom (the French broadcasting authority).

(c) The French advertising regulator.

Key risks and description

Prevention or mitigation actions initiated or continued in 2022

In practice:

TF1 has taken the following measures to prevent violations of human rights when broadcasting TV news and other programmes:

- approval process for topics before they are broadcast (viewing, blurring, etc.);
- the following points checked by Programme Compliance teams for all programmes other than TV news reports and LCI: non-incitement of dangerous, delinquent or uncivil practices or behaviour, respect for viewer sensitivities, non-encouragement of discriminatory behaviour based on race, gender, sexual orientation, religion or nationality, promotion of the values of inclusion and solidarity;
- training for TF1 and LCI reporters provided by the Legal department on the principles of press laws, personal image and privacy rights, surreptitious advertising, and CSA regulations; and
- a News Ethics committee that meets regularly (comprising five independent people). Its role is to uphold media freedom, independence and pluralism and contribute to respect for the principles of honesty, independence and pluralism of news information and the programmes that contribute to it.

Personal data breaches

Use of non-compliant personal data (missing data on data subjects, no legal purpose, retention of personal data, lack of appropriate security measures thereby facilitating hacking, data theft, cyberattack, etc.)

- Implementation of a specific organisation: a DPO supported by a "personal data" compliance officer for the entire group and a network of 54 data liaison officers from the operations, IT and legal departments representing each of the TF1 group's departments and subsidiaries responsible for addressing personal data issues in the entities.
- Continuation of the personal data protection policy comprising 15 general principles, practical business segment information sheets, procedures (management of personal rights, CNIL inspection, management of data breach incidents, etc.) and guidelines (retention periods, subcontractor checklist, etc.).
- Use of a data privacy tool for managing register updates, data subject rights requests, etc.
- Continuation of training and awareness actions in the various TF1 group entities, introduction of a mandatory e-learning module for all employees and support in rolling out the second version of IAB^a Europe's Transparency and Consent Framework^b.
- Continued use of standard contracts/clauses to govern aspects related to personal data protection with customers and partners (including Data Processing Agreements^c and safety schedules).

Health and safety**Working conditions at TF1 sites causing harm to the health and safety of people**

Lack of proper measures to prevent the risk of terrorist attack, intrusion, hostage taking (or kidnapping), fire, flood or workplace accident

Lack of rules to prevent Covid-19 risks or psychosocial risks (stress at work, psychological and/or sexual harassment), etc.

- Regarding risk of harm to the physical well-being of people working on TF1 sites:
 - improved building protection and access conditions (biometrics, events gantries, static barriers and guards in front of the main entrance, etc.);
 - continuation of the safety action plan implemented in 2018 in the Boulogne-Billancourt buildings. This consisted of physical security work (reinforcing access points, anti-ram vehicle barriers, better burglar-proofing, covering ground floor windows, entry and exit security vestibules, etc.), and strengthening technological resources (full overhaul of the facial recognition system, full overhaul of the fire detection system, etc.) and human resources (security agents better equipped and trained in self-defence, Security and Fire teams, doctors and nurses trained in damage control);
 - annual drill to ensure that the systems in place in the event of the River Seine flooding are effective;
 - accident reports discussed by the Health & Safety Committee, if necessary with amendments to the prevention plan and update of the occupational risk assessment document (DUERP); and
 - training available in correct posture and movement, run by an osteopath.

(a) Interactive Advertising Bureau.

(b) Framework giving the publishing and advertising industries a common language with which to communicate consumer consent for the delivery of relevant online advertising and content.

(c) Agreement setting out the rights and obligations of the parties regarding personal data protection.

Key risks and description

Prevention or mitigation actions initiated or continued in 2022

	<ul style="list-style-type: none"> ● Regarding psychosocial risks, the following measures have been taken: <ul style="list-style-type: none"> ▪ implementation of a health and stress monitoring system, training and awareness-raising in these risks (for managers and HR staff), a procedure for identifying and dealing with complaints for sexual or psychological harassment, sexist behaviour and violence in the workplace appended to the internal regulations, and a network of trained liaison officers for harassment and violence in the workplace; ▪ annual assessment of psychosocial risks in the occupational risk assessment document (DUERP) prepared by each TF1 group company: <ul style="list-style-type: none"> - the action plan is included in the group collective agreement on the quality of working life signed in 2019 and will be renegotiated in 2023. If necessary, the monitoring committee may propose changes to the action plan. It includes a two-yearly QWL survey, a 24/7 psychological hotline ("Stimulus Care Services"), a HAD assessment (hospital anxiety and depression assessment based on 14 questions) alongside the occupational medical check-up, and creation of a network of liaison officers to inform employees about harassment and the fight against workplace violence. - an item on the employee's access to technical and emotional support in the workplace added to the annual performance assessment questionnaire on workload following the outcome of the February 2022 QWL survey on stress assessment. - Casual sexism, a microaggression that can affect employees' psychological health and self-confidence, now included in the psychosocial risks referred to in the occupational risk assessment document (DUERP). ▪ TF1's commitment to the #StOpE initiative and mandatory training for all employees on casual sexism.
<p>Violation of the health or safety of people during the group's activities at non-TF1 sites</p> <p>Harm to the physical well-being of people (public, candidates, actors, employees, service providers, etc.) at shows or on production sets for recorded or live programmes</p>	<ul style="list-style-type: none"> ● Regarding risk of harm to the physical well-being of people: <ul style="list-style-type: none"> ▪ contractual undertakings or guarantees on safety measures made by the other contracting party and insurance covering the health and safety of people; ▪ equipment compliance inspections by accredited organizations (electrical installations, resistance of materials, etc.). ▪ presence of an emergency doctor on some programmes (e.g., <i>Ninja Warrior</i>); ▪ "prevention plan" training for in-house and external productions; ▪ drawing up prevention plans for special operations (editorial and production arrangements for a major topical event requiring the use of specific production resources in partnership with service providers, such as the French Ministry of Armed Forces for the 14 July parade). ● Regarding the risk of harm to people's health: a Covid-19 protocol drawn up by a specialised independent company supported by recommended measures, presence of a nurse and doctor to perform PCR tests, presence of a health & safety officer on production sets for some programmes (e.g., <i>Ninja Warrior</i>).
<p>Insecurity of reporters and technical support staff working in conflict or risky zones</p> <p>Travel to unsafe areas to cover risky events (e.g. Ukraine/Russia conflict, gang warfare, etc.) exposing reporters and technical support staff to the risk of physical and psychological harm.</p>	<ul style="list-style-type: none"> ● Availability of specific equipment and applications to help ensure the safety of reporters and technical support staff in conflict zones or high-risk areas. ● Teams supported by security agents, use of fixers^a during travel to high-risk countries. ● Customised training organised for reporting teams in high-risk areas such as sensitive inner-city areas and conflict zones, and reporters registered for training sessions provided by the French Ministry of Defence, etc. ● Regular review of insurance cover to ensure that all identified risks are covered. ● In liaison with the French Ministry of Culture, use of a harmonised certificate enabling all employees who do not hold a press card to benefit from police protection. ● Prevention plans drawn up for special operations.

(a) Service providers with a member of staff operating in the area where the report or documentary is being filmed and who can act as interpreter and/or guide for a team of TF1 reporters.

Key risks and description	Prevention or mitigation actions initiated or continued in 2022
<p>Violation of consumer health due to the use of a service or product distributed by TF1</p> <p>Sale of a product or a service by TF1 Entertainment, TF1 Spectacle or Unify that might harm the consumer's health</p>	<ul style="list-style-type: none"> Conformity tests (French and European standards) performed by external service providers (inspection firms, consultancy firms)
Environment	
<p>Risk of environmental impact due to the supply chain for products, services and programmes ordered or produced by TF1</p> <p>Order or production by TF1 of programmes whose production, transport or filming cause significant environmental pollution</p>	<ul style="list-style-type: none"> Stronger role given to Ecoprod, a non-profit that has over 200 members and has bolstered its range of tools to promote eco-responsible production in the TV industry, including an upgrade of its carbon calculator and the introduction of an eco-criteria scorecard. Participation in working groups led by the CNC as part of its action plan for a public ecological and energy transition policy in the cinema, TV and animation industry, which has led to the definition of specifications designed to harmonise methods of calculating the carbon impact of productions. Continued work by the Green Newen committee whose role is to step up action to reduce the carbon footprint of Newen production sets. Measurement of the carbon impact of Newen France's productions in 2020 and roll-out of an action plan with targets to reduce this impact by 2024 and 2030, supported by the appointment of a carbon manager working full time on eco-production within Newen.
Impact of activities on the climate	<ul style="list-style-type: none"> Roadmap drawn up to reduce TF1's greenhouse gas emissions (in absolute value) by 2030 and application for objectives to be endorsed by the SBTi. Risk mapping the carbon impacts of purchases to prioritise purchasing categories (intellectual IT services, IT hardware, broadcasting equipment, equipment hire, transport and vehicle rental, facilities management) and priority suppliers (about 80). Regular discussion with priority suppliers as part of the drive to reduce greenhouse gas emissions, monitoring the actions they take appropriate to their business activities and measuring the carbon impact of their services where necessary. Training purchasers in the group-wide Purchasing department in ecological transition and supply-chain decarbonisation issues. Moving towards an electric vehicle fleet, providing a sustainable mobility allowance and mobility financing for employees with company cars. Measuring the carbon impact of MyTF1, tf1info.fr and TFOU Max websites and taking action to reduce that impact, such as optimising video flows and image resolution or data storage in technical infrastructures. Decrease in energy use, renewal of ISO 50001 certification and renovation of internal data centres. Implementing commitments made under the Climate agreement with Arcom, including raising the awareness of staff, partners and co-contractors about ecological transition issues, gradual reduction in offers made on broadcasting channels comprising products and services that have a negative impact on the environment, proposing specific conditions for information campaigns conducted by government authorities and charities promoting responsible practices and use of less polluting products. Raising the awareness of and training employees in ecological transition, climate and carbon issues through collective intelligence workshops such as the <i>Fresque du Climat</i>, conferences and training specifically devised for businesses that play a driving role in TF1's ecological transition. Rolling out training programmes in 2022 and 2023 for employees in the advertising sales, diversification, purchasing and support departments, TF1 Production and the content and editorial departments of TF1 and LCI.

Key risks and description	Prevention or mitigation actions initiated or continued in 2022
Environmental impact of advertising	<ul style="list-style-type: none">• 2022 general purchasing terms and conditions include "Ecorespons'Ad", an advertising slot available only to certain eco-responsible products and services, based on the criteria defined by Ademe^(a). This will continue in 2023.• Eco-funding launched in 2022 and to be continued in 2023. TF1 contributes to the fund in proportion to its advertising campaigns for products meeting an Ademe environmental criterion. The fund finances awareness-raising campaigns about environmental impact labels and criteria recommended by Ademe (environmental labels, <i>Énergie</i> label, repairability and environmental display index).• TF1 group was also the driving force behind the co-development and roll-out of the "<i>Fresque de la Publicité</i>" awareness workshops (inspired by the <i>Fresque du Climat</i> workshop), which is now used by other sector operators.• TF1 Pub took part in advertising market initiatives promoting the ecological transition to identify common reference bases and tools to measure the carbon footprint of advertising campaign broadcasting.

(a) The French environment and energy management agency.

Action plans and areas for improvement

In 2023, the TF1 group plans to improve and strengthen actions rolled out in 2022.

It also intends to continue including CSR and low carbon requirements in its specifications and taking these criteria into consideration when selecting suppliers. For example, through the contractual "carbon clause", TF1 will monitor its suppliers' carbon footprint reduction actions throughout the contractual relationship, including where appropriate annual progress

reports and a carbon impact reporting dashboard for services and products purchased by TF1.

The main focus of the energy and climate roadmap is eco-production through actions to raise the awareness of programme providers, measuring the carbon impact of internal productions (TF1 Production and Newen) and in-house training to reduce that impact.

4.3.5 Bouygues Telecom

Governance

For the fourth consecutive year, the CSR and Legal departments had joint responsibility for running the vigilance steering committee, which includes representatives from the Purchasing, Human Resources and Health and Safety, Regulatory Affairs and Risk departments.

The cross-disciplinary committee exchanges views and information about various risks. The shared risk mapping exercise has created a genuine cross-disciplinary approach to risk assessment. The risks and prevention or mitigation measures described below have been presented to the Management Committee.

Risks and actions taken

Specific actions are taken to address the risks identified in the table below.

Key risks and description	Prevention or mitigation actions initiated or continued in 2022
<p>Human rights and fundamental freedoms</p> <p>Risk of violation of human rights and safety by service providers and subcontractors:</p> <ul style="list-style-type: none"> in plants that manufacture Bouygues Telecom brand products; in plants that manufacture handsets; in offshore call centres; on telecoms sites during installation or dismantling work, for connecting customers; and in Bouygues Telecom stores during fitting out work <p>Child labour, forced labour, pay (minimum wage and overtime), disciplinary practices (psychological, physical or sexual harassment), working hours, paid leave</p>	<ul style="list-style-type: none"> The CSR Charter for Suppliers and Subcontractors is appended to orders and contracts managed by the Purchasing departments. The charter imposes certain requirements and failure to comply can lead to measures that may go as far as contract termination. Annual documentary (EcoVadis) or on-site (SGS) CSR audits for suppliers deemed to be most at risk based on the CSR risk mapping by purchasing category. 62 audits were performed in 2022. During 2022, a reinforced on-site audit campaign was conducted in the call centres. Continued systematic EcoVadis assessments of suppliers during tender invitations in the "high" risk purchasing categories and, since 2022, the "medium" risk purchasing categories. In the event of non-compliance or unsatisfactory results, suppliers are required to implement appropriate action plans and follow-up audits or reassessments are performed. Bouygues Telecom became a member of the JAC^a in 2022 to strengthen its action and share best CSR practices with other member telecoms operators. A number of Bouygues Telecom suppliers formally questioned on the working conditions of Uyghurs in China's Xinjiang region following a report published by the Australian Strategic Policy Institute citing some of its suppliers.
<p>Risk of violation of human rights related to the sourcing of conflict minerals used to manufacture electrical and electronic equipment (routers, network equipment, etc.)</p> <p>Sourcing of minerals from certain politically unstable areas, where armed groups frequently used forced labour in mineral mines</p> <p>Indirect financing of armed groups</p>	<ul style="list-style-type: none"> Questions about conflict minerals systematically included in the specifications for tender invitations for strategic electrical and electronic equipment. Update of questionnaire on conflict minerals sent to the main suppliers.

(a) Joint Alliance for CSR: a non-profit body of telecoms operators which aims to verify, assess and drive forward the implementation of CSR at the main multinational suppliers in the Information and Communication Technologies (ICT) sector.

Key risks and description

Personal data breaches

Non-compliance with the personal data protection regulations

Error in recording the data subject's choices

Security weaknesses: data leak, security breach (confidentiality, integrity, availability)

Prevention or mitigation actions initiated or continued in 2022

- GDPR training for staff: on-line training completed by 89% of employees handling personal data in 2022 and awareness sessions for new arrivals.
- Continuation of information systems security projects, including the drive to reinforce pentests, increase in response resources and acceleration of resilience and reconstruction capability in the event of a cyber incident.
- Internal data governance strengthened with the implementation of a network of 27 employees responsible for data use in their respective departments.
- GDPR procedures implemented in new subsidiaries and introduction of quarterly monitoring committees in the subsidiaries.
- Organisation of a cross-disciplinary project to bring the company into line with European regulatory changes on the transfer of personal data outside the EU.

Health and safety

Risk of non-compliance with electromagnetic wave exposure limits for mobile sites, and for mobile handsets sold by Bouygues Telecom – for employees, subcontractors, customers and the general public

Exposure to higher-than-permitted electromagnetic waves emitted by Bouygues Telecom network equipment

Breach of the specific energy absorption rate (SAR) by products sold by Bouygues Telecom

- New measures taken since 2021 to support the roll-out of 5G and the potential use of new frequencies:
 - updating technical specifications for the roll out of mobile sites (site demarcation and safety perimeter);
 - upgrading procedures and tools to include the operational aspects of site demarcation; and
 - taking exposure measurements for 5G trials at 26 GHz.
- Adapting technical specifications in the form of additional recommendations. Regarding the rules for collocation of 2G/3G/4G and 5G masts (i.e. concentration of multi-operator masts in one place, with or without infrastructure and local facility sharing).
- Monitoring and analysis of atypical points (exposure over 6V/m).
- Regarding mobile phone masts, adapting safety perimeters according to their upgrades including 5G: all maintenance employees provided with a personal dosimeter and trained in electromagnetic waves and the use of electromagnetic wave dosimeters.
- Regarding radio equipment: implementing the new regulatory provisions on displaying mobile phone exposure levels.
- Updated information on handset exposure levels (SAR^a head, trunk and limbs) in all distribution channels.
- Checks on compliance with internal procedures designed to ensure strict application of the regulations on public electromagnetic wave exposure.
- Brochures describing changes to the regulations on public information requirements distributed to customers.
- Raising awareness in distribution channels about the application of the revised regulations on public information requirements.
- New educational videos on electromagnetic waves published on Bouygues Telecom's website page on their effects (explanations, opinions of health authorities).
- Apart from recommendations made by the French (Anses), European and international (OMS) health authorities, independent experts also monitor developments on a continuous basis.

(a) Specific absorption rate.

Key risks and description**Violation of the health and safety of employees and partners**

Violation of the safety of people working in stores: risk of external violence towards employees and customers (hold-up, physical aggression, protest)

Prevention or mitigation actions initiated or continued in 2022

- Organisation of awareness-raising actions for staff during a prevention week and a quality of life and working conditions week.
- Annual audit of all stores to check that safety systems are working properly.
- Continued security work on stores, both selling areas and backrooms, based on the risk assessment (CCTV cameras, panic alarm, duress code, security fog system, security cabinets, GPS trackers, etc.).

In practice:

In response to escalating violence towards in-store customer advisers, Bouygues Telecom has taken the following measures:

- A standby line and hotline (a special team based in Tours) to support in-store customer advisers should a customer become aggressive and reporting of calls to supplement risk measurement and analysis.
- Security guards present in stores from time to time according to need.
- On-line safety training for all in-store staff; and
- In-person training on managing aggressive behaviour for almost 1,000 in-store employees. Psychological support for staff from an occupational psychologist.

Increase in rude behaviour from customers having effects on the health of call centre advisers

- Implementation of a training plan for call centre staff in response to the increase in customer rude behaviour and conflict situations.
- Study and taking into consideration of psychosocial risk factors that could have an impact on working organisation, working time arrangements, working conditions, communications or subjective factors.

Violation of the safety of people involved in negotiating new telecoms masts or the roll-out of new sites and technical call-outs (verbal aggression and physical attack)

- Dissemination of an internal memo about telecom sites and a practical information sheet illustrating how to react and behave at high-risk sites vulnerable to physical attack.
- Restrictions on access to telecoms network sites that vulnerable to serious attack.
- Specific instructions for calls-outs at sites identified as vulnerable to physical attacks.
- In 2021, roll-out of an operating and legal support guide in the event of employee safety violations.
- Risk analysis prior to any large-scale replacement and installation of 5G masts and/or fibre.
- Continuation of the Lone Worker alarm system by providing a telephone that can be used to call for help swiftly if the person falls or feels unwell.
- Installation of individual and collective fall protection systems.
- Raising the awareness of operators and training employees in prevention and first aid and in using and checking individual protective equipment.
- Vandalism and aggression issues monitored by the French Telecoms Federation. Measures agreed between the law enforcement bodies and operators. Signature of cooperation charters with the judicial authorities to improve the legal response.

Key risks and description

Prevention or mitigation actions initiated or continued in 2022

Environment

Impact of activities on the climate and environment

- SBTi endorsement of short-term carbon reduction targets (2021-2027) as part of Bouygues Telecom's 2030 Climate strategy: -29.4% for scopes 1 and 2, -17.5% for scope 3.
- Six-monthly reporting to the Executive Committee, monitoring specific indicators, and implementation of an internal governance system covering this issue.
- 100% of all renewable energy used backed by "Guarantees of Origin" and a PPA^a covering up to 10% of use in 2024.
- Measures to extend the life of products and equipment:
 - regarding smartphones, the "Sustainable Smartphone Solutions" programme (advertised in the press, on TV and on Bouygues Telecom's website) promoting recycling and lifetime extension (repair and trade-in incentives, sale of refurbished phones), and B2B mobile rental service;
 - regarding telecoms sites and equipment, lifetime optimisation approach and end-of-life repurposing of equipment through a pre-emption policy with a view to reuse (reconditioning) or recycling; use of second-hand equipment for network installation and maintenance; and
 - regarding Bouygues Telecom routers, continuation of the eco-design approach and product design commitment to extend their lifetime to the maximum, improve their end-of-lifetime repair and recycling, and promote the use of recycled materials:
 - use of at least 90% halogen-free recycled plastic;
 - improved energy performance from one new product generation to the next (at equivalent technology); and
 - reduction of the carbon footprint from one new product generation to the next (at equivalent technology).
 - Obtain an environmental label or certification for all new products. In 2022, an eco-designed TV decoder and an router were certified.
 - Regarding product end-of-life and WEEE^b recycling: rolling out procedures promoting the reuse and, in the last resort, recycling of its fixed, mobile, consumer and B2B^c products.
- Raising the awareness of citizens about the impact of digital technology on the environment and digital sustainability:
 - encouraging customers to use digital technology more sustainably;
 - in 2021, over 70,000 downloads of "*Mon empreinte smartphone*", a free app available to everyone designed to help people adopt more responsible mobile internet use by informing customers and prospective customers about eco-responsible digital issues and the eco-friendly behaviour to adopt to limit this impact based on an analysis of the user's Internet use and calculation of the CO₂ emissions generated; and
 - launch of "Source", a socially responsible smartphone plan that encourages people to control their consumption and support non-profits of their choice by donating unused gigas.
- Regarding energy, continued energy efficiency and performance approaches:
 - rolling out energy savings features at mobile sites and features to better manage the energy use of radio frequencies (turning some of them off at night) to optimise the electricity use of certain telecoms installations;
 - switch to green hydrogen in 2022 to fuel the power generators on some of the network's mobile sites;

(a) Power Purchase Agreement.

(b) Waste electric and electronic equipment as defined in Article R.543-172 of the French Environment Code.

(c) <https://www.corporate.bouyguetelecom.fr/nos-engagements/demarche-societale-environnementale/numerique-positif-pour-la-planete/des-produits-et-services-plus-durables/>

Key risks and description**Prevention or mitigation actions initiated or continued in 2022**

	<ul style="list-style-type: none"> ▪ renewal of ISO 50001 certification for the Montigny-le-Brettonneux data centre and the main administrative sites, reinforcing the mobile network energy management system; and ▪ improving consumption monitoring, management and profile knowledge tools, identifying areas of optimisation. September 2022 signature of the Ecowatt charter of commitments comprising a 10% electricity reduction plan in the Winter of 2022-2023. Moderating consumption and raising awareness of staff and customers about energy efficiency. • Making "La Fresque du Numérique", "La Fresque de l'Économie Circulaire" and "2 tonnes" awareness-raising workshops available to staff and continued roll-out of "La Fresque du Climat" workshop with over 1,200 employees trained; development of on-line carbon impact training. • Taking part in working groups on the impact of digital technology alongside the digital ecosystem including the public authorities, Ademe, Arcep, and manufacturers of telecoms equipment, routers and smartphones.
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Impact on the climate and environment of suppliers' and subcontractors' activities and products

Hazardous substances, waste, pollution

Climate change adaptation

- Annual documentary (EcoVadis) and on-site (SGS) CSR audits for suppliers deemed to be at-risk based on the CSR risk mapping by purchasing category. Suppliers with an unsatisfactory overall EcoVadis score are contacted and asked to draw up an action plan. Suppliers who are non-compliant following an on-site audit are asked to provide action plans.
- A letter sent to the top 100 suppliers asking them to join Bouygues Telecom's Climate initiative, which led to:
 - further meetings organised in 2022 with suppliers of fixed products, telecoms equipment, handsets and services (representing over 60% of amounts invoiced in 2021) to identify drivers and reduce the environmental impact of those products and services, particularly in terms of carbon;
 - workshops organised with suppliers on their Climate strategy objectives; key suppliers asked to perform a lifecycle analysis of their products and services, to set reduction targets and implement the associated eco-design and circular economy action plans; and
 - a questionnaire and environmental requirements included in tender documents for suppliers. Introduction of a significant "environmental choice" criterion for selecting suppliers. Critical in-house reviews of life cycle analyses provided in tenders by the most mature suppliers.

Action plans and areas for improvement

Regarding the risk of violation of human rights and the health and safety of subcontractors and suppliers, Bouygues Telecom will:

- continue to audit new eligible suppliers as well as current suppliers identified as at-risk following a CSR audit;
- monitor the results and systematically perform an EcoVadis assessment on those belonging to the high-risk and medium-risk purchasing categories during tender invitations;
- continue to perform assessments on suppliers for tender invitations eligible for the conflict minerals questionnaire and suppliers' responses to the conflict minerals questionnaire sent out in 2022. Suppliers considered to be insufficiently mature will be asked to draw up remedial action plans; and
- raise the awareness of purchasers about human rights.

Regarding health and safety, Bouygues Telecom will:

- continue training in managing conflict situations, including rude behaviour, for customer relations and in-store staff; and
- sign an inter-operator agreement on arrangements and instructions for mast power cuts during work on multi-operator sites.

Regarding the environment, Bouygues Telecom will:

- continue its decarbonisation drive, continue to raise the awareness of staff and develop the appropriate tools; and
- continue to hold specific meetings and workshops with its suppliers to harmonise the criteria for assessing environmental impacts using an application to analyse the life cycle of the products it buys. It will continue its approach of involving its partners by including an environment clause in its supply contracts, and its key suppliers by accelerating eco-design and innovation initiatives.