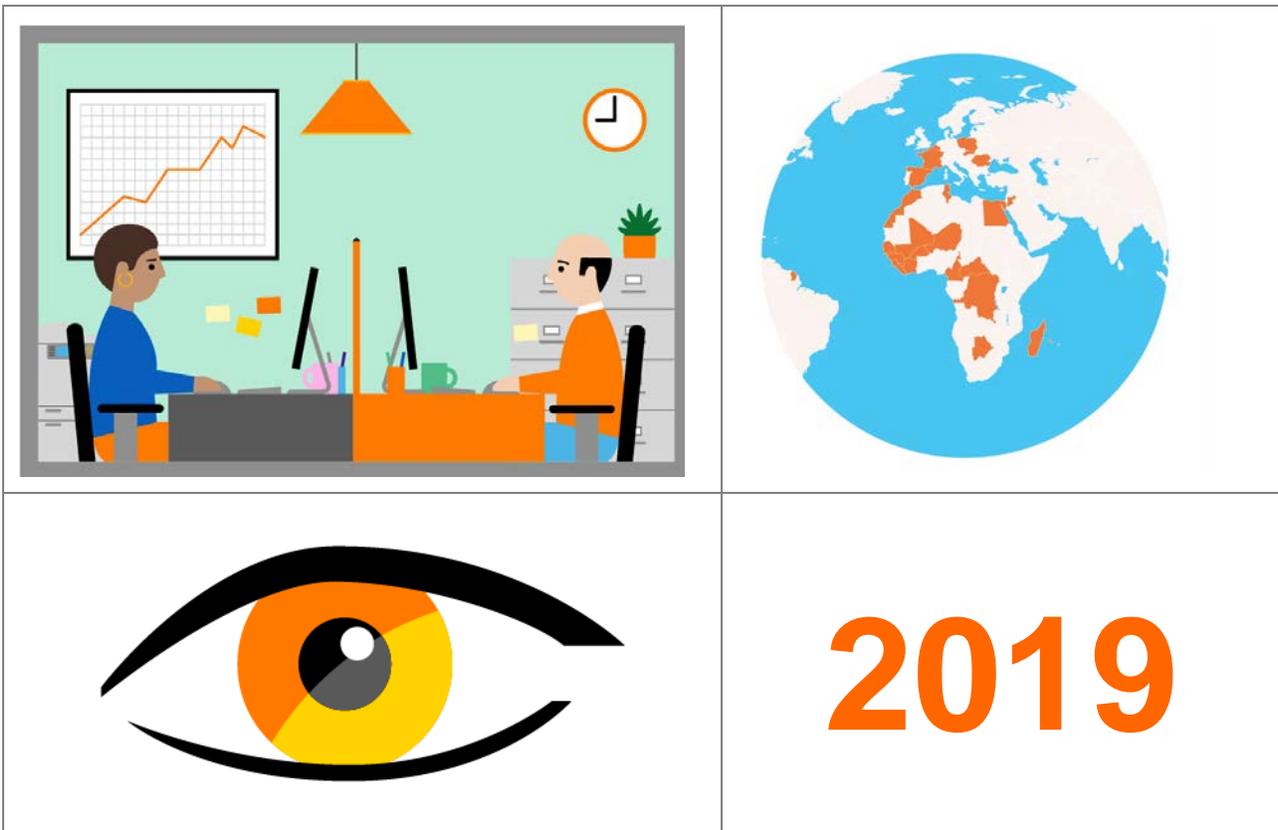


Vigilance Plan Implementation Report

Orange



Contents

1.	Implementation of the Vigilance Plan related to the cluster of risks associated with the lack of or a faulty Vigilance Plan.....	3
1.1	Vigilance Plan governance	3
1.1.1	At Group level	3
1.1.2	At entity level	3
1.1.3	Consultation with stakeholders.....	3
1.2	Scope of implementation monitoring.....	4
1.3	Operational implementation	4
1.3.1	Methodology for local adaptations of the Vigilance Plan.....	4
1.3.2	Status of implementation of risk mapping and mitigation action plans	4
1.3.3	Internal audit work on the implementation of the Vigilance Plan	5
1.4	Whistleblowing system.....	5
2.	Implementation of the Vigilance Plan related to the cluster of risks associated with the effects of our activities in terms of respect of human rights and fundamental freedoms	5
2.1	Protecting Personal Data.....	6
2.1.1	Operational organization:	6
2.1.2	Awareness and Training.....	6
2.1.3	Controls	7
2.2	Breaches of human rights and fundamental freedoms	7
2.2.1	Impact study on human rights	7
2.2.2	Promotion of human rights and fundamental freedoms	7
2.2.3	Freedom of association and right to collective bargaining on working conditions.....	7
2.2.4	Combating discrimination.....	9
3.	Implementation of the Vigilance Plan related to the cluster of risks associated with health and safety.....	12
3.1	Managing health and safety at work.....	12
3.2	Special case of managing psychosocial risks.....	14
3.2.1	2019 survey on the prevention of psychosocial risks.....	14
3.2.2	Mitigating the social crisis of 2007/2010	14
3.3	Special case of managing the Covid-19 epidemic.....	15
4.	Implementation of the Vigilance Plan related to the cluster of risks associated with the environment	15
4.1	Toward the circular economy.....	15
4.1.1	Waste prevention and management.....	16
4.1.2	Use of rare and critical resources.....	18
4.2	Toward a lower impact on the environment and the climate.....	18
4.2.1	Network energy consumption	19
4.2.2	Other energy consumption.....	20
5.	Support for suppliers and subcontractors.....	21
5.1	New supplier assessment program for the subsidiaries of Orange	21
5.2	On-site JAC audits.....	22
5.3	On-site audits in the MEA region	22
6.	Result of indicators introduced to monitor and assess measures	23
7.	Conclusion.....	25

1. Implementation of the Vigilance Plan related to the cluster of risks associated with the lack of or a faulty Vigilance Plan

1.1 Vigilance Plan governance

1.1.1 At Group level

In 2019, Orange enhanced the governance of the Vigilance Plan by building on the review by the specialist committee of the Board of Directors on Governance and Corporate Social Responsibility and its approval, also in February 2020, of Orange's Board of Directors, with a review by the Ethics Committee, comprising in particular the members of the Group's Executive Committee responsible for Group Human Resources, Corporate Social Responsibility, Diversity, Partnerships and Inclusiveness, Group Finance and Performance, the General Secretariat and the Group's Chief Compliance Officer. Indeed, following a decision in July 2019, this committee's remit has been expanded to include Monitoring the Group's Non-Financial Performance. These new responsibilities include preparing the Group's Vigilance Plan, the operational monitoring of its implementation and associated reporting.

Risk mapping for the Vigilance Plan was also referred to the Risk Committee in September 2019, then to the Audit Committee (another specialist Committee of the Board of Directors). The Board of Directors' Joint Committee also specifically reviewed climate change risk in October 2019.

As part of Orange's 2019 commitments set out in its Purpose and its new strategic plan, Engage 2025, covering the 2020-2025 period, the environmental action plan developed by the Group and Orange's position and outlook in this respect have undergone an extensive review by the Group's Executive Committee and its Board of Directors bringing the relevant issues to the attention of the highest echelons of the Group.

1.1.2 At entity level

At the end of 2018, the action plans arising out of the local adaptations of the Group Vigilance Plan, as well as their monitoring by the entity, were approved by all relevant subsidiary Boards of Directors in Europe and by the Executive Committee in the case of divisions of Orange SA, in line with the governance arrangements in place for the implementation of Orange's Vigilance Plan.

At the end of 2019, 96% of Entities within the scope of the monitoring of the Vigilance Plan appointed a manager with responsibility for implementing the Vigilance Plan within the subsidiary or entity in question. As such, a network of 26 Vigilance Plan implementation managers has been established. Its members, who are appointed or designated by the entity's CEO, are from a range of backgrounds. The majority (40%) are CSR Managers with 30% Risk Managers and 23% Compliance Officers.

Reviews of divisional internal controls organized by Internal control, and in which the Group CSR responsible for implementing the Plan has taken part since 2019, have been updated to include the topics contained within the Vigilance Plan as well as compliance with the Anti-Corruption Policy and with the Code of Ethics. As of the date of publication of the implementation report, these reviews covered the following entities: Human Resources Department, Orange France, Orange Business Services.

1.1.3 Consultation with stakeholders

In 2019, the implementation of the Vigilance Plan gave rise to multiple exchanges with Orange's stakeholders for the purpose of sharing good practices and feeding into existing workstrands:

- Within the "Vigilance Plan" working group, under the auspices of the human rights association, EDH (Entreprises pour les droits de l'Homme), Orange regularly shares good practice in terms of implementing the Vigilance Plan with companies listed on the CAC40. In particular, at the meeting in January 2020 there was lively discussion on the duty of vigilance of businesses with national employee representative bodies, including practical testimonies from businesses about securing stakeholder buy-in for their plan, the responses and expectations of unions to the implementation of the law on the duty of vigilance of businesses and measures taken to promote buy-in from union representatives.
- in discussion with the public authorities, Orange having contributed through interviews to the review of the implementation of the law on the duty of vigilance of parent companies and principals, which gave rise to a report produced by the General Council on

the Economy, Industry, Energy and Technologies (Conseil général de l'économie, de l'industrie, de l'énergie et des technologies)¹. This report includes recommendations which are a source of inspiration for improving the implementation of the Plan within the Group.

- In consultation with its stakeholders through regular discussions led by Orange, the topics of upholding human rights and fundamental freedoms have been raised by Orange in order to understand the impact on the various regions in which the Group operates or the various populations surveyed. The findings are currently undergoing analysis.

1.2 Scope of implementation monitoring

The scope selected for monitoring the implementation of the Plan in 2019 was based on methodological support from the Group Audit, Control and Risk Management Department: it covers the entities chosen for the Sarbanes-Oxley program, i.e. a scope representing 95% of the Group's revenues, extended for the purposes of the Plan to include subsidiaries with €100 million in consolidated revenues. It does not yet include companies acquired in 2019. In the case of Orange Business Services (OBS), all revenues have been included in the calculation below, although the implementation within all subsidiaries of the OBS is ongoing.

As such, the scope for monitoring the implementation of the plan in 2019 covers: the main divisions of Orange SA and the main Group subsidiaries – OBS, Orange Spain, Orange Poland, Orange Belgium, Orange Romania, Orange Slovakia, Orange Egypt, Sonatel, Orange Mali, Orange Côte d'Ivoire, Orange in Morocco, Orange DRC, Orange Cameroon, Orange Guinea, Orange Jordan, Orange Burkina Faso, Orange Bank. Operational implementation.

The Ethics Committee officially assigned the operational management of the implementation of the Vigilance Plan to the Group CSR Department. For this purpose a cross-departmental steering group (CSR Department, Audit, Internal Control and Risk Management Department and Legal Department) was set up and reports to it. It has convened regularly to establish the methodology for implementation at Group level and offer coordination and support to entities.

1.3 Operational implementation

1.3.1 Methodology for local adaptations of the Vigilance Plan

The adaptation of risk mapping linked to the Vigilance Plan established at Group level, as well as action plans set by the Group for the purposes of mitigation, have been circulated in line with the recommendations on implementation issued by the Group's Risk Management, as is the case with all risk clusters monitored by the Group. In addition to this resource, an educational "implementation kit" was circulated and presented globally, in particular at the annual CSR seminar and in the form of dedicated presentations at the request of entities. The support of the cross-departmental Steering Group has made it possible to respond to questions as and when they arise. At entity level, the Vigilance Plan Manager has received support (as needed) in adapting this mapping to the local context from the risk manager, reclassifying Group risks within each cluster and establishing a mitigation policy; action plans established and approved in the executive committees of entities include a proposed schedule and an indicator for determining the status of each action. A reporting indicator is established at Group level and linked to each risk in the Plan.

1.3.2 Status of implementation of risk mapping and mitigation action plans

At the end of 2019, the cross-departmental Steering Group reported that 56% of entities (corresponding to 75% of Group revenues) had effectively implemented the risk mapping in the Vigilance Plan, adapting it to their local context, and had proposed associated risk-hedging policies. Some entities were still in the process of conducting the exercise, or the documents received and discussions held had not resulted in sufficiently robust conclusions in terms of effective implementation. Of these 56% of entities, 26% (representing 61% of the Group's revenues) have a detailed risk-hedging action plan and 30% (representing 14% of the Group's revenues) have clearly identified how the risks in the plan are broken down within their entity and are in the process of approving the action plans to be implemented through their Executive Committee.

The process and support continued to the end of February 2020. Some 63% of entities effectively implemented the process (representing 89% of the Group's revenues).

¹ https://www.economie.gouv.fr/files/files/directions_services/cge/devoirs-vigilances-entreprises.pdf

1.3.3 Internal audit work on the implementation of the Vigilance Plan

1.3.3.1 CSR self-assessment questionnaire

In the course of 2019, self-assessment of entities focused on CSR governance and contributed to ensuring effective coordination between the new network of Vigilance Plan Managers and that of CSR Managers at entity level. A questionnaire produced jointly by the Group Audit, Control and Risk Management Department (DACRG) and the Group CSR Department, was circulated to the Group's main subsidiaries and entities, including those listed as part of the process for monitoring the implementation of the plan.

The answers and evidence provided by Entities were jointly analyzed by the DACRG and the Group CSR Department. A summary is then produced, and action plans and analyses are issued at entity or Group level.

56% of entities responded, corresponding to 67% of Group revenues. In particular it was used to verify the identification and appointment of CSR Managers and Vigilance Plan Managers. It showed the necessity of providing support and/or discussion around the CSR policies of entities in connection with the Vigilance Plan.

1.3.3.2 Internal audit work on the implementation of the Vigilance Plan in France

In early 2019, the Group CSR Department called on the Group Audit Department to ensure, within the scope of Orange France, (1) that the Vigilance Plan had been properly adapted within the division, (2) that the necessary information had been properly consolidated, (3) that the plan had been properly implemented in relations with suppliers, subcontractors and subsidiaries, in order to approve good practice and identify areas of difficulty in order to facilitate adaptation across the Group as a whole. This work helped to improve the implementation of the program through recommendations without reconsidering the method of implementation. To date, a training course is yet to be put in place and its target audiences determined.

1.4 Whistleblowing system

Communication on whistleblowing mechanisms (Group mechanisms and local mechanisms in Europe and Africa/Middle East) was reinforced in 2019: the number of alerts received at Group level has significantly increased on the previous year (+80%) with a distribution between geographical regions and operational or corporate entities as shown below:

France	25%
Group Corporate	24%
Technology and Innovation	9%
Europe (excluding France)	4%
MEA	30%
Orange Business Services	6%
External	2%
total	100%

2. Implementation of the Vigilance Plan related to the cluster of risks associated with the effects of our activities in terms

of respect of human rights and fundamental freedoms

Reminder: the specific risks identified in terms of the impact of Orange's activity with regard upholding human rights and fundamental freedoms are:

- slavery and human trafficking
- inadequate working conditions (including suppliers and subcontractors)
- infringement of a child's rights to a good education and healthy development

the operational implementation report of which is based on Orange's Declaration under the Modern Slavery Act.

- infringement of the freedom of association and right to collective bargaining on working conditions
- discrimination
- breach of the freedom of expression (in civil society)
- violation of privacy

of which the report is presented below.

2.1 Protecting Personal Data

Protecting personal data is part of respecting privacy; it is achieved through the implementation of the governance of the GDPR program by the Group Security Department along with the Personal Data and Security Department of the Group Legal Department. It is part of the respect for privacy.

2.1.1 Operational organization:

The approach taken by the Group Security Department is audited by a yearly assessment to check compliance with the Group's Security Standard; it is used to evaluate entities in terms of data security and propose areas for improvement. 30 such reviews were conducted in 2019 within the scope of European entities and in Africa (operator subsidiaries and Group support functions) and enabled vulnerabilities to be corrected and the organization of security at certain subsidiaries to be structured.

In terms of personal data protection, all "Operator" subsidiaries in Europe and Orange Business Services had a Data Protection Officer (DPO) in 2019. The DPO Network is managed under the framework of the Data Protection Committees by the Group DPO; it met once a month in 2019 to ensure correct deployment of the compliance approach in line with developments in legislation, share good practice, analyze typical complaints and review the entities' internal procedures. Several hundred people in the Group spend all or part of their time maintaining this continuous improvement approach and supporting the business divisions.

For entities in the Middle East and Africa region, regional staff, like their European counterparts, are made aware of personal data protection through meetings. Legal requirements in the Middle East and Africa region are monitored.

2.1.2 Awareness and Training

Like the security area, raising the awareness of all employees about the risks and the acquisition of best practices by everyone were carried out with support from the Security Department and by data protection training. An employee data protection charter was disseminated in the countries and remains accessible via the Company's intranet. The entities have promoted follow-up e-learning programs or training sessions. In some entities, the participation rate is estimated at over 80% of personnel.

2.1.3 Controls

In 2019, five Group entities were assessed on-site in Europe and the Middle East and Africa region to check correct implementation of the Group Security Standard, share good practices from other subsidiaries and collect their own good practices. The results were shared with the entities' CEOs and used to adjust the action plans according to the areas of improvement identified.

Similarly, the Security Oversight Centers (SOCs), a major tool in detecting and preventing cyber threats, were assessed against four principles: governance, process, technology and human resources. The objective is to help the SOCs to mature and thereby become more effective at detection.

2.2 Breaches of human rights and fundamental freedoms

2.2.1 Impact study on human rights

Based on its 2019 impact study on human rights, which was nourished by the multi-criteria analysis of Verisk Maplecroft on all entities where Orange acts as an operator and by major political events (tensions during the electoral process), Orange paid special attention to the following geographical regions: the Democratic Republic of the Congo, the Central African Republic, Guinea, Cameroon, Mali, Madagascar, Egypt. Orange upholds the principles of the GNI, of which it is a member.

In keeping with these principles, Orange has committed to upholding and striving to protect the freedom of expression of users by seeking to prevent or minimize the impact of governmental restrictions on freedom of expression. Like other member companies of the GNI, Orange is independently assessed every two years on its progress in implementing the GNI principles. The aim of the assessment is to enable the GNI's Board of Directors to determine whether each member company is striving in good faith to implement its principles as part of a continuous improvement approach. The independent assessment, which includes both an examination of the company's processes (systems, policies and procedures) and an examination of specific case studies, concluded that implementing the GNI principles is definitely a priority for the Group, that the principles are integrated in Orange's policies and that Orange makes an effort to implement the GNI principles in good faith as part of a continuous improvement approach.

2.2.2 Promotion of human rights and fundamental freedoms

Orange renewed its signature of the United Nations Global Compact in 2019 in compliance with the fundamental principles stated in the Universal Declaration of Human Rights and the International Labour Organization, and publicly defends its values, in particular as concerns its responsibility towards its supply chain:

- on invitation from the German Federal Government on February 21, 2019, at a workshop on the responsibility of principals towards their suppliers and sub-contractors with regard to respect for human rights and fundamental freedoms, the health and safety of people and the environment, as part of implementing the Vigilance Plan.
- at the Innovation Forum in London on April 2 and 3, 2019, by explaining its responsibilities and policy against forced labor and modern slavery in its supply chain
- at the OECD Peace Forum in November 2019, against child labor and forced labor of its suppliers and sub-contractors.

Moreover, Orange took part in round tables at RightsCon in Tunis to present the risks of potential intrusion associated with 5G as well as possible actions to be taken by operators when faced with governmental requests to shut down networks; this event on the theme of Technology and Human Rights took place from June 11 to 14, 2019 and was attended by over 2,000 participants from 130 countries and over 700 businesses, representatives of government and organizations.

In addition, as a member of the EDH association (Entreprises pour les Droits de l'Homme) Orange continued dialogue with NGOs and trade unions on the duty of vigilance, in particular on human rights, in February 2020.

2.2.3 Freedom of association and right to collective bargaining on working conditions

The Orange Group promotes a substantial structured dialog involving its employees, labor unions and associations of employee representatives. With a focus on increased transparency and collaboration, Orange has set up employee representative institutions for all scopes. Each of these institutions has its own powers which improve the social dialogue.

Orange recognizes the right for its employees to have freedom of association, representation and membership of a trade union in accordance with the principles set by the ILO convention no. 87 of 1948 on freedom of association and the right to organize. Employees are free to become members of their choice of trade union or not to do so.

2.2.3.1 Organization of social dialogue

At Group level

In accordance with the incorporation agreement of 2010, the Global Works Council, created to share a common basis for social dialogue at Group level, was renewed in 2019. It comprises 33 members representing 25 countries across the world, each with more than 400 employees. It met once in 2019. It examines economic, financial and employee-related matters globally and transnationally, such as the Group's general business and its probable developments, its financial situation, its industrial and commercial strategy, and innovation.

The employee representatives are either trade union representatives appointed by their trade union to sit on the committee, or representatives appointed by elected forums of employees, or employee representatives appointed by a democratic process according to locally defined rules. It enables broad representation of members of OMEA members.

In Europe

The European Works Council comprises 28 employee representatives from 19 countries and met three times in 2019, to discuss structural topics such as the economic and financial situation per sector of activity, the probable development of business and the Group structure, the industrial strategy and innovation, plus the major directions in terms of investment, job evolution and forecasts.

In France

In 2019, the Central Committee of the Orange Works Council (CCUES) met 10 times over 20 days. During the year, this employee representative body addressed 51 subjects (including 16 for information-consultation), in addition to examining the resolutions adopted in respect of the management of Social and Cultural Activities (SCA). Of these 16 items, 13 related to annual reports and assessments provided by agreement or under the French Labor Code and 3 related to proposed organizational or process changes.

The French Works Council, a contractual body covering all the Group subsidiaries in France, was renewed in February 2019. It met three times during fiscal year 2019, dealing with 13 topics relating to the business, the financial situation, job development and Group structure.

2.2.3.2 Summary of collective agreements

In 2019 a global agreement on professional gender equality within the Orange group was signed.

During 2019, 10 agreements or amendments were negotiated and signed at national level in France:

- two agreements or amendments dealing with compensation agreements:
 - amendment No. 1 to the 2018-2020 incentive agreement of June 28, 2019
 - the pay agreement 2019 of April 24, 2019
 - an agreement relating to the management of social and cultural catering activity in UES Orange of May 31, 2019
- an agreement relating to employer contribution and management of Social and Cultural Activities at UES Orange of November 12, 2019
- an agreement relating to social dialogue within UES Orange of May 13, 2019
- an amendment revising the agreement of June 28, 2017 on the employment and integration of disabled people and the fight against discrimination 2017-2019 of June 17, 2019
- amendment No. 1 to the agreement on social dialogue within UES Orange of October 21, 2019
- an agreement relating to the mandatory negotiations within the Orange Group of November 18, 2019
- a pre-electoral memorandum of agreement (PAP) relating to the 2019 professional elections of June 6, 2019
- an amendment No. 1 to the pre-electoral memorandum of agreement of September 17, 2019

2.2.4 Combating discrimination

Orange is convinced of the benefits of diversity, both for its economic performance and for the well-being of its teams. In combating discrimination, Orange is implementing a policy of "Diversity and Inclusion" which is aimed at welcoming and developing all talents, is putting in place the conditions for a positive employee experience and encouraging societal commitment on the part of employees. This policy is based on a vision in which management operates in a benevolent atmosphere, promoting inclusion and wellbeing at work.

On July 17, 2019, Orange signed a worldwide agreement with UNI global union on gender equality in the workplace, combating discrimination and violence, and the work-life balance (hereinafter the Global agreement on gender equality at work). Usable and adaptable in countries where the Orange Group operates, this agreement is based on a participative approach by all the stakeholders, with structured social dialogue and the setting up of special local committees in the main subsidiaries. A shared inventory and action plans appropriate to the context of the country will be monitored over time, in relation with the trade unions, thus confirming the Orange Group's commitment to long-term action.

2.2.4.1 Gender equality in the workplace

Percentage of women – Group		2019	2018	2017
% of women in the active workforce	▮▮	36.0%	36.1%	36.1%
% of women in supervisory staff ⁽¹⁾	▮▮	30.9%	30.6%	29.9%
% of women in management networks ⁽²⁾	▮▮	31.1%	29.8%	28.5%

(1) The "supervisory staff" indicator counts employees in the "senior management" category, which corresponds to the consolidation of Levels E, F and G of the French collective agreement on telecommunications (CCNT). Entities outside France rely on a document describing each level of the CCNT to match each of their employees to the relevant CCNT level.

(2) These are the executive and leadership networks, which counted 1,274 executives between them at the end of 2019. These managers hold highly responsible positions in the Group.

- Item reviewed by KPMG: reasonable assurance.

Gender equality in the workplace is a common priority shared by all Group entities. Orange's policy in this field is led by the Professional Equality Strategy Committee, which comprises members of the Executive Committee as well as individuals representing Group entities. This committee, which is one of the Group's principal governance bodies, sets out the broad outlines of the gender parity policy and tracks progress made on a regular basis.

The policy is deployed in the Group across four areas:

- equal pay:
 - the Group conducts regular assessments country by country, which result in customized action plans. The common statistical standard used by the Group last year is now used for all subsidiaries of over 400 employees to ensure standard measurement of pay gaps.
 - In France, maintaining special budget accounts in the annual pay increase exercises has continued to reduce the pay gaps between men and women. In accordance with the law of September 5, 2018 on the freedom to choose a future career, Orange publishes indicators every year relating to gender pay gaps and the actions taken to remove them. In 2020, Orange's Social and Economic Unit obtained an overall grade of 99 out of 100 for the indicators measured over 2019.
- equal access by women to positions of responsibility:
 - The Group has set a target of 35% for the entire managerial population and for management networks. The increased presence of women on Orange's executive management bodies was demonstrated in 2019. The Group's Executive Committee is still 33.3% female. In application of the provisions of Article L. 225-37-4 6° of the French Commercial Code, the results in terms of gender diversity in the 10% of positions with greater responsibility within the Group are in steady progression: the rate of feminization in the networks of management, which includes 1,274 executives and leaders, has passed from 28.5% in 2017 to 31.1% in 2019. Career development or mentoring programs (including by the Group's senior management) are offered to high-potential female employees in several countries;
- gender balance in all of the Group's occupations, particularly the technical ones:
 - In France, in May 2019, Orange, a member of the Femmes@numerique Foundation since 2018, signed a Manifesto for the redeployment of women into the digital sector, initiated by Syntec Numerique and Social Builder, in the presence of the Secretary of State for Digital Affairs. In addition, through the "Classes for Female Technicians" program, 500 women seeking work were trained in technical occupations between 2012 and 2019, nearly three-quarters of whom were hired as permanent Orange employees. Since 2017, this program has been supplemented by "Classes for Female Engineers" and "Classes for Female Sales Managers" programs. The Women Start and #Femmes Entrepreneuses programs, dedicated to female entrepreneurship and launched successfully in 2018, were renewed in 2019. 2019 saw continued efforts to overturn the

educational stereotyping of girls and to awaken their interest in scientific and technical studies, with Shadowing days and a Girls' day in several countries, the Capital Filles program in France and Romania and the Elles Bougent initiative in France.

- the balance between private life and work life:
- Convinced that the work-life balance is a factor in improved quality of life at work, the Group intends to promote this balance across all geographical regions. Work-life balance was the subject of a chapter in the Global Agreement on Professional Gender Equality which promotes, in particular, remote working, flexitime, the right to disconnect and adjustments to working time for employees who are parents or carers.
- In France, the 5th agreement on gender equality and work-life balance signed last year expanded the paid leave donation system and put in place a digital platform to assist with the administrative formalities that have to be completed when an employee becomes a carer.

2.2.4.2 Communications and awareness-raising

Orange communicates with its employees to raise their awareness of the issue of gender equality in the workplace, whether by using the intranet, the diversity communities of the company's social network and through motivational or communications campaigns and events organized throughout the world, for example, on International Women's Day (March 8). In France, the "equal opportunities visa", an online awareness module launched in June 2018, was followed by 11,000 employees in 2019.

2.2.4.3 Evaluation of the gender equality policy

Since 2011, the Group's Professional Equality Policy has undergone a continuous improvement process and is evaluated as part of the Gender Equality European and International Standard (GEEIS), which was extended in 2017 to cover all diversity issues and renamed as the Gender Equality & Diversity for European & International Standard. The Group's diversity and workplace gender equality policy and its implementation are audited every two years by an independent outside organization and are certified in 17 countries. In 2019, certification was confirmed for 10 entities in nine countries: the Group, France, Brazil, Tunisia and all the countries in the Europe zone: Belgium, Luxembourg, Moldavia, Poland, Romania and Slovakia. In September 2019, in New York, the new GEEIS-SDG award was given to the Orange Foundation's Women's Digital Centers.

At the same time, the global Stakeholder Dialogue mechanism for diversity and gender equality in the workplace, introduced by the Group in 2015, is still being rolled out in the subsidiaries. Conducted in nine countries (Spain, France, India, Jordan, Poland, Romania, Russia, Senegal and Tunisia) between 2015 and 2018, it was extended to Belgium in 2019.

Orange's performance has been confirmed by several rankings:

- Equileap international ranking: between 2018 and 2019, Orange went from 73rd to 54th place out of 3,000 companies worldwide;
- Gender Equality Index Bloomberg 2019: Orange is a member of this stock exchange of the 230 global companies most committed to gender equality.

2.2.4.4 Employment and integration of people with disabilities

Disabled employees – Orange SA	2019	2018	2017
Number of disabled employees ⁽¹⁾	5,250	5,432	5,547
Amount invoiced by the sheltered employment sector (in millions of euros)	20.1	19,6	17.8
Integration rate ⁽²⁾	7.0%	7.1%	7.1%

(1) Disabled employees declared in the French mandatory declaration for disabled employees (DOETH).

(2) Rate of integration calculated in accordance with DOETH methods. The value given for 2019 is provisional.

In France:

In 2019, the Group continued to implement the actions set out in the sixth agreement on the employment and integration of people with disabilities, signed in June 2017 and covering the period from 2017-2019. This specifically involved reinforcing the leadership of the network of disability specialists in the divisions and operational entities, the digitization of requests for adapting disabled employees' workstations, the "live my life" DuoDay event between Orange employees and disabled people outside the company, or the provision of external expertise to drive forward new practices in recruiting people with disabilities.

For five years, the amount of Orange's procurement from the sheltered employment sector (STPA) has steadily increased (+34%), reaching 20.1 million euros in 2019. Procurement from this sector is also increasingly diversified. A commitment letter was signed at the Responsible Purchasing trade fair in Paris in May 2019 for local services intended for Orange Data centers.

Lastly, Orange reaffirmed its commitments in October 2019 when Stéphane Richard signed the Manifesto for the inclusion of disabled people in economic life in France, an initiative led by the Secretary of State responsible for people with disabilities.

Outside France:

- The Group, as a signatory of the International Labor Organization “Business and Disability” charter in 2015, continues to be an active member of the Global Business and Disability Network and in 2019 took part in this network’s annual conference in Geneva.
- The global agreement on gender equality at work also covers anti-discrimination, specifically setting out Orange’s commitments to people with disabilities and offering flexible working to employees who are carers.
- In December 2019, the Group joined the global movement The Valuable 500, bringing together the 500 largest companies that work to promote the inclusion of people with disabilities. This international commitment was signed by Stéphane Richard.

Finally, on December 3 this year, to mark the International Day of Disabled Persons, Orange launched a call for testimonials from its employees, at global level. The purpose of this internal campaign is to change people’s views of disability, give employees the chance to speak, and highlight the commitment of the Group and its employees to the inclusion of people with disabilities.

2.2.4.5 Combating discrimination and equal opportunities policy

For many years, Orange has been engaged in combating all forms of discrimination, one of the major focus areas of its Diversity policy. Internationally, combating discrimination was included in the global agreement on gender equality at work. In this agreement, Orange reaffirms its equal treatment of recruitment candidates, based on the skills and experience required for the post. Similarly, in this agreement Orange commits to ensuring that access to training, career development and work organization is subject to objective criteria.

In France:

Orange renewed its intergenerational agreement for 2019-2021, covering the Group’s companies in France and taking into account three major areas of focus: the sustainable employment of young people (work-study contracts, internships, recruitment and career development, etc.), the employment of seniors (recruitment, training, validation of learning, skills sponsorship, etc.) and the transfer of knowledge and skills (mentoring and tutoring). 2019 was the first year of a new intergenerational agreement lasting until 2021, signed on December 12, 2018 with the trade unions. As in previous years, the number of interns and work placement students welcomed to the Group in France was higher than the minimum commitments, respectively 2,150 and 2,400. In addition, there were 4,796 students on work/study contracts in France as of December 31, representing 5.6% of permanent contracts on the same date. The vocational integration rate in France is therefore above the commitments made by Orange to trade union organizations and its legal obligations (5%).

Professional integration – Group in France ⁽¹⁾	2019 ⁽⁴⁾	2018	2017
Number of new intern students received during the year ⁽²⁾	2,614	2,617	2,691
Number of work-based learning contracts signed during the year ⁽³⁾	3,510	3,535	3,516

(1) Orange SA and its subsidiaries with workforces in France.

(2) Applies to students who have signed their internship agreement during the year.

(3) Apprenticeship and professional-track contracts.

(4) Numbers given for 2019 are provisional.

Orange is committed to a long-term policy to help young people from modest backgrounds, individually or collectively, to enter the world of business. This support is provided through partnerships with associations in which more than 800 Orange employees give their time: Capital Filles in France and Romania, Article Un, Énergie Jeunes, Nos Quartiers ont des Talents, and Proximité. Combating discrimination is also included in the company collective agreement for the employment and integration of people with disabilities, signed in June 2017. Within the scope of that agreement, a great many actions were taken to make combating discrimination a high priority, such as:

- monitoring the actions set out in the collective agreement for the employment and integration of people with disabilities and combating discrimination: the monitoring committee met with the trade union organizations twice in 2019;
- providing the whistleblowing service Allodiscrim (external to Orange) to employees and external recruitment candidates to report and deal with any situation of discrimination, and processing of any Allodiscrim and Defender of Rights referrals by the Group Diversity department.

To mark the International Day against Homophobia, Orange continued its internal awareness campaign in France, in partnership with Mobilisnoo, the Group’s LGBT+ employee network. Orange also published its first LGBT+ guide for employees: “Sexual orientation and gender identity: understanding and acting at Orange in France”.

3. Implementation of the Vigilance Plan related to the cluster of risks associated with health and safety

3.1 Managing health and safety at work

The Orange group is committed to making its occupational health, safety and quality of life policy a cornerstone of its CSR policy. This policy is based on the global health and safety agreement and the laws and regulations in force in each country. The Group's commitments are detailed in the Vigilance Plan.

The performance indicators below go some way to monitoring the effectiveness of the implementation of the Group's policy.

In 2019, the scorecard for health, safety and absenteeism covers over 95% of personnel in the consolidated Group.

In application of the Worldwide Health and Safety agreement of 2014, and in line with the rollout of the Group Vigilance Plan:

- All the Group's companies have social dialogue bodies dedicated to health and safety and employee working conditions;
- All the Group's employees have sickness insurance cover.

Absenteeism

Number of employee days absence due to illness ⁽¹⁾	2019 ⁽²⁾	2018 ¹	2017
Group total	1,083,272	1,088,973	1,114,112
o/w Orange SA	647,309	679,895	727,882

(1) The definition relates to employees on permanent contracts and employees on temporary contracts. It excludes work-based learning participants.

(2) The number given for Orange SA is for the fiscal year 2019, recorded at January 15, 2020. This does not take account of any adjustments made subsequently. The value will be updated to the final value in next year's annual report.

Number of employee days absence due to occupational accidents ⁽¹⁾	2019 ⁽²⁾	2018 ¹	2017
Group total	32,565	37,865	39,704
o/w Orange SA	25,906	29,160	32,392

(1) This indicator covers employees on permanent contracts and employees on temporary contracts. It excludes work-based learning participants.

(2) The number given for Orange SA is for the fiscal year 2019, recorded at January 15, 2020. This does not take account of any adjustments made subsequently. The value will be updated to the final value in next year's annual report.

Group-wide (as well as within the Orange SA scope), the number of days of employee absence due to illness decreased significantly, including in terms of the reduced number of employees. The decline was even more pronounced for work-related accidents.

Absenteeism following a work accident continues to fall. These improvements may be largely due to continued efforts at better information and training in workplace health and safety for employees, managers, and CHSCT/CSS members.

Occupational accidents and illnesses

Indicators are expressed on a calendar basis. The number of theoretical working hours over the year fluctuates by country. It is calculated based on the number of employees on duty (full-time equivalent), the number of annual theoretical working days, and the number of theoretical working hours per day in each country where the Group operates (source: ILO for the last two items).

Number of occupational accidents with lost time ⁽¹⁾	2019 ⁽²⁾⁽³⁾	2018	2017
Group total	615	732	683
o/w Orange SA	411	541	514

(1) Occupational accidents with lost time and the associated number of days lost are recognized in accordance with applicable local regulations.

(2) The indicator was collected on more than 95% of the Group consolidation scope.

(3) The number given for Orange SA is for the fiscal year 2019, recorded at January 15, 2020. This does not take account of any adjustments made subsequently. The value will be updated to the final value in next year's annual report.

Number of fatal occupational accidents	2019	2018	2017
Group total	2	2	1
o/w Orange SA	0	0	0

The Group experienced two fatal accidents in 2019 (road accidents).

Frequency rate of occupational accidents ⁽¹⁾	2019⁽²⁾	2018	2017
Group total	3.01	3.33	3.06
o/w Orange SA	3.87	4.94	4.48

(1) The frequency rate of occupational accidents corresponds to the number of occupational accidents with lost time per million theoretical working hours. These theoretical working hours are calculated based on the number of annual theoretical working days in each country where the Group operates (source: ILO). Occupational accidents with lost time and the associated number of days lost are recognized in accordance with applicable local regulations.

(2) The number given for Orange SA is for the fiscal year 2019, recorded at January 15, 2020. This does not take account of any adjustments made subsequently. The value will be updated to the final value in next year's annual report.

Severity rate of occupational accidents ⁽¹⁾	2019⁽²⁾	2018	2017
Group total	0.16	0.18	0.18
o/w Orange SA	0.24	0.27	0.28

(1) The severity rate of occupational accidents corresponds to the number of days of sick leave for occupational accidents per thousand theoretical working hours. These theoretical working hours are calculated based on the number of annual theoretical working days in each country where the Group operates (source: ILO). Occupational accidents with lost time and the associated number of days lost are recognized in accordance with applicable local regulations.

(2) The number given for Orange SA is for the fiscal year 2019, recorded at January 15, 2020. This does not take account of any adjustments made subsequently. The value will be updated to the final value in next year's annual report.

Number of employees whose cases were classed as occupational illness	2019⁽¹⁾	2018	2017
Total Orange SA	32	33	58

(1) The number given for Orange SA is for the fiscal year 2019, recorded at January 15, 2020. This does not take account of any adjustments made subsequently. The value will be updated to the final value in next year's annual report. It only takes into account recognized occupational illnesses declared by active employees.

The indicator "number of cases that classed as occupational illness" concerns Orange SA exclusively. Over 80% of the occupational illnesses recognized are musculoskeletal disorders. The figures are too weak, in absolute terms, to make a relevant interpretation. It is to be noted that they only relate to files opened by active employees.

Actions taken as part of the global health and safety agreement

In the Middle-East Africa region:

Members of OMEA's Health and Safety Committees received classroom-based training in health and safety and quality of life at work and in implementing the global agreement over three years, from 2016 to September 2019: 18 countries took part (137 people trained); 294 training hours were provided. This training brought together in the same place over a two to four day period, employee representatives and human resources representatives from a single country and also from multiple countries, allowing an exchange of expertise and improving social dialogue and the efficiency of the various health and safety committees.

In Europe:

Visits were organized in Spain and the countries within the Europe Division (Slovakia, Poland, UK, Belgium) over a two-year period (2018 and 2019), involving three representatives of trade unions having signed the global agreement and three departmental representatives (one for the Risk Prevention and Occupational Quality of Life Department, one for the International Labor Relations Department and one for the Europe Division). They provided an opportunity for two days of discussion between local union representatives and the division on arrangements for implementing the global agreement. Best practices were highlighted and circulated within the Group's Occupational Quality of Life Network.

Within OBS:

There are multiple training sessions on health and safety and occupational quality of life, open to a large number, with many resources on the intranet that are regularly updated. The topic is closely monitored at both central and local levels.

At Group level

- The "Occupational Quality of Life by Orange event" is run by the Group's Occupational Quality of Life Department in the form of a quarterly meeting by telephone lasting one and a half hours (one for French speakers and one for English speakers): it is aimed at the Group's Occupational Quality of Life network made up of Health and Safety and Occupational Quality of Life managers (or OH&S experts), occupational doctors and Human Resources Directors. At each session, a specific theme is addressed in detail by the speaker with discussion throughout the session on the respective practices in the various entities. As such, the duty of vigilance, remote working, health and safety risk prevention and management in the event of business travel, procedures for tackling harassment and violence at work have been covered.
- The Group's reporting on health and safety is managed at the level of the Group's Occupational Quality of Life Department which conducts an annual review of the quantitative and qualitative aspects of the actions implemented within the Group under the global health and safety agreement. Owing to the diversity of respondents within each entity and the range of actions covered, the Group has identified an increase in the frequency of reporting as an area for improvement to ease discussion. Indeed, on the one hand this reporting covers governance, ensuring the presence of a specific health and safety policy letter for each entity, the existence of an occupational health and safety management system (OHSMS) in each entity and training for managers on this topic. On the other hand, it is aimed at identifying the specific players in occupational health and safety within each entity (occupational health services, on-site infirmaries, occupational health and safety expert or manager, security manager, CSR manager), at monitoring encrypted data on absenteeism presented at the beginning of this chapter, and more generally establishing working conditions, remote working, procedures to be implemented in the event of harassment and violence at work, counseling arrangements etc. Note that there are many counseling hotlines within the group, particularly in France since the social crisis of 2009, in the Europe region and within OBS. In some cases they are incorporated as part of a general approach to occupational quality of life.
- OHSMS: Cap ISO 45001. In 2019, the Group's Occupational Quality of Life Department was commissioned to offer support to the various Group entities from 2020 with in light of the transition of their OHSMS to the new ISO standard 45001. Entities such as Spain or Jordan adopted this change back in 2019 and are now ISO 45001 certified. OBS also began working towards this in 2019.

3.2 Special case of managing psychosocial risks

3.2.1 2019 survey on the prevention of psychosocial risks

Under the agreement on the assessment and prevention of psychosocial risks at work signed in May 2010, Orange has set up a joint National Stress Prevention Committee (NSPC) responsible for "overseeing a regular assessment for a shared diagnosis".

As such, in 2019 Orange commissioned a specialist firm to work with trade unions to produce its fourth survey on the following six aspects of work: work intensity and working time, emotional demands, autonomy, social relationships, conflicting values, insecurity of the work situation. In 2019, some 37,000 employees (43%) responded to over 150 questions.

In 2019 the European Works Council and representatives of the Group's Occupational Quality of Life Department worked together to determine arrangements for a European working conditions survey conducted in early 2020 at the request of the European Works Council.

On the whole, the 2019 survey results showed a strong attachment to the company and pride in working there. According to the report, emotional demands, social relationships and conflicting values achieved "satisfactory scores" and had undergone "significant improvement" since 2012. As for autonomy at work, its position was "intermediate" and it was "no longer seeing any improvement". Work intensity and insecurity of work situation are noted as areas for improvement.

These overall scores are broken down for each secondary establishment and within each of the Group's main business lines (call centers, sales branches, response units, IT services etc.) for the operational monitoring and implementation of preventative measures.

3.2.2 Mitigating the social crisis of 2007/2010

In the context of the so-called France Telecom social crisis trial, in July 2019 Orange decided to set up a compensation commission to review individual situations. Its implementation was discussed with the trade union organizations. A Monitoring and Repair Committee, set up on October 1, 2019, is reviewing the individual requests that will be submitted until the end of June 2020 by

persons who worked with the company between 2007 and 2010 and their beneficiaries. It is responsible for reaching amicable solutions and settlements in order to avoid long, costly and socially painful litigation procedures for those concerned.

As of February 12, 2020, the Committee has already considered around 190 individual requests, including around 90 which were either closed following settlement, or declared inadmissible.

3.3 Special case of managing the Covid-19 epidemic

The COVID-19 epidemic affects human health, and specifically that of Orange's employees, suppliers, subcontractors and customers, as well as the Group's activity and financial position. On April 19, 2020, Orange implemented a business continuity plan, particularly in France. It mainly covers the supervisory and operational teams within the network and information systems, security teams, technical support, staff in the Data centers and response teams.

With the support of the Global Coordinator, the Group has introduced preventative measures, relying on remote working for employees in any cases where remote operations are possible and the necessary equipment is available. In other cases, Orange has also promoted protective measures where possible in its instructions for staff and has provided personal protective equipment.

4. Implementation of the Vigilance Plan related to the cluster of risks associated with the environment

With regard to the environment, Orange is taking measures to be Net Zero carbon by 2040, with the midway 2025 aim of reducing its own CO2 emissions by 30% compared to 2015, thanks to a renewed energy efficiency plan, use of renewable energies and carbon sequestration for its residual emissions.

4.1 Toward the circular economy

Orange is working to reduce the environmental impact of the products and services marketed to its customers throughout their life cycles. Among other things this entails incorporating the circular economy into all its processes and business lines.

4.1.1 Waste prevention and management

Environmental performance (waste)	Units	2019			2018	2017
		France ⁽¹⁾	Rest of the World	Group Values	Group Values	Group Values
Internal consumption						
Paper and cardboard used: internal (office) and external use (marketing, invoicing, packaging, etc.)	metric tons	4,429	556	4,985	7,154	9,126
consumed water	m ³	668,412	38,896	707,308	1,106,883	1,280,102
Internal evacuated waste						
Internal WEEE (network and services)	metric tons	1,097	416	1,512	1,393	2,210
<i>Recovery rate</i>	%	92.9%	97.2%	94.1%	91.0%	85.4%
Wooden poles	metric tons	18,859	289	19,148	19,805	17,687
<i>Recovery rate</i>	%	100.0%	100.0%	100.0%	100.3%	100.0%
Batteries	metric tons	827	767	1,594	1,387	1,781
<i>Recovery rate</i>	%	69.0%	96.2%	82.1%	83.0%	84.1%
Other hazardous waste (PCB – printer cartridges – fluorescent tubes included)	metric tons	161	9	170	189	254
<i>Recovery rate</i>	%	88.2%	78.0%	87.7%	93.8%	89.5%
Total hazardous waste	metric tons	20,944	1,481	22,424	22,774	21,932
<i>Recovery rate</i>	%	98.3%	97.1%	98.2%	98.6%	96.2%
Cables ⁽²⁾	metric tons	11,528	355	11,883	12,563	24,519
<i>Recovery rate</i>	%	75.4%	94.8%	76.0%	78.9%	86.3%
Paper and cardboard	metric tons	2,220	458	2,678	3,254	3,157
<i>Recovery rate</i>	%	100.0%	93.4%	98.9%	86.1%	98.8%
Metal poles	metric tons	1,227	322	1,549	1,508	1,251
<i>Recovery rate</i>	%	100.0%	100.0%	100.0%	100.0%	100.0%
Other non-hazardous waste	metric tons	7,172	1,739	8,911	9,434	10,664
<i>Recovery rate</i>	%	46.8%	84.1%	54.1%	48.7%	59.7%
Total non-hazardous waste	metric tons	22,147	2,875	25,022	26,759	39,591
<i>Recovery rate</i>	%	70.0%	83.8%	71.6%	70.3%	72.3%
Total internal evacuated waste	metric tons	43,091	4,355	47,446	49,533	61,523
<i>Recovery rate</i>	%	83.8%	91.6%	84.5%	83.3%	86.5%
Customer WEEE waste collected (including batteries and rechargeable units)	metric tons	3,380	365	3,745	2,754	1,371
<i>Recovery rate</i>	%	86.3%	44.3%	82.2%	82.7%	82.9%

Since the values are rounded up, the Group values may not be the sum of the "France" and "Rest of World" values.

(1) The France scope covers Orange France, the Group's headquarters, Orange Marine and the entities of Orange Business Services operating in the country.

(2) Due to a lack of detailed data, in this table Orange has included all cables as non-hazardous waste; However, some of the oldest cables contain hazardous substances which are treated on an ad-hoc basis at the end of their life.

Orange's waste prevention and management policy, both for itself and its customers, is based on extending the life of products and equipment, notably through their re-use and optimizing their end-of-life treatment. The Group's commitments to the circular economy in the Engage 2025 strategic plan are presented in Vigilance Plan.

In 2019, the Group generated 47,446 metric tons of internal waste, 4.2% less than in 2018, and recovered 84.5% of it, once again up 1.2 points from the previous year.

This indicator principally concerns waste generated in France (which accounts for 90.8% of the Group's waste) where there are clear procedures for identifying and treating waste. This information is harder to obtain in other countries.

The recovery rate in France is improving, reaching 83.8% of internal waste in 2019 compared to 83.1% in 2018.

4.1.1.1 Optimizing the life cycle and end-of-life equipment

The Group acts in several complementary ways:

- optimizing the management of waste and end-of-life equipment generated internally, by implementing processing suited to each category of waste and ensuring that they are traceable;

- collecting and processing used electronic equipment from customers through approved external partners or collective sectors (where they exist).

Although in the European countries, the implementation of suitable systems is already well under way, the emergence of new circular economy models will, in particular, involve the development of recycling, using appropriate systems in countries where there is currently no structured waste management industry.

Since 2010, Orange has teamed up with Emmaüs International and Ateliers du Bocage, a company in the social and solidarity employment sector, to open mobile waste collection workshops in Africa. In the absence of efficient local recycling structures, the collected waste is amassed and then recycled in France per European environmental standards. These workshops have opened in five countries (Burkina Faso, Benin, Cameroon, Côte d'Ivoire and Niger), have created 30 local jobs, and collect on average 12 metric tons of mobile phones annually, with more than 2.4 million mobiles collected.

4.1.1.2 Giving equipment a second life

To reduce the impact of electronic waste on the environment, Orange strives to ensure obsolete devices are re-used or are dismantled for recycling, in accordance with environmental standards in force.

Internally, Orange has a “marketplace”, a platform where network equipment can be reconditioned and re-used, with the support of the manufacturers who guarantee its correct functioning. The re-use might be due to a change in technology between countries, or technological redeployment between different geographical areas.

The amount of Waste Electrical & Electronic Equipment (WEEE) Orange collects from its customers has increased significantly at Group level to reach 3,754 metric tons in 2019 (up 37% compared with 2018). As with internal waste, this indicator mainly represents waste collected in France (France represents 90% of WEEE waste collected by the Group).

The recovery rate of customers' WEEE at Group level was more or less unchanged at 82.2% in 2019, (compared with 82.7% in 2018). In France, the recovery rate of customers' WEEE decreased slightly (83.8% in 2019 compared with 86.2% in 2018), but the actual amount of WEEE recovered rose from 2,463 metric tons in 2018 to over 3,380 metric tons in 2019.

In 2019, the handset collection rate was 16.3% over all the European countries in the Group, an increase of +0.9 points compared to 2018, with 1.6 million handsets collected, over 14.7 million since 2010. This increase is mainly due to France.

Two handset collection systems exist side by side:

- some countries have made collection schemes part of their business models, incorporating handset recovery or promoting environmental responsibility. Collection rates in France and Romania, for example, are above 20%. In France, the “Orange Reprise” program allows users to return with benefit their old phone after an assessment since 2013. The collection rate therefore reached 30% in France over the last quarter of 2019, with over 1.1 million handsets collected during the year;
- in other countries, independent resellers or collectors play this role, leaving Orange subsidiaries with much lower collection rates.

To facilitate recycling, Orange has been distributing the Fairphone mobile terminal on the French market since 2017. Fairphone 3, which is adaptable and repairable and can extend the average life of a phone by two years compared to other smartphones, was designed using recycled materials such as copper or plastic and minerals from non-conflict zones; since its launch in September 2019, it has been distributed by Orange.

The circular economy in action: Livebox and decoders

As an example, Orange has applied the principle of the circular economy by setting up a process for the eco-design, collection and reconditioning of Livebox and Decoders, with the aim of reducing their environmental footprint, reusing the resources and making significant savings.

The reconditioning requirement is included from the design stage and continued throughout the life cycle of the products. Orange and its suppliers joined forces to eco-design these products so that they can be disassembled and upgraded simply and easily. As part of the strategy undertaken with Livebox 4 and the TV UHD decoder, Orange has worked with its ecosystem of partners to improve production and reduce by 29% the carbon footprint of the new Livebox 5, launched in 2019, with a 100% recycled plastic shell, lighter, more compact manufacture, fewer electronic components and a new design that enables passive ventilation without a ventilator.

A meticulously run and monitored collection scheme ensures that as many used products as possible are recovered, sorted, tested, rebooted and reconditioned as new so that they can be reused several times in their life cycles.

In 2019, the collection rate of multimedia equipment in Europe (Liveboxes, Set-top Boxes, Airboxes) reached around 90%, thanks to the above programs, with the collection of 2.7 million units in France, 0.5 million in Spain, 0.3 million in Poland and 0.05 million in

Belgium. This equipment is tested, repaired and reconditioned in line with the principles of the circular economy, so that it can be re-used up to five times. In 2019, the reconditioning specifications were reviewed, delivering a gain in efficiency of around 15%.

4.1.2 Use of rare and critical resources

Since 2011, Orange has applied a process aimed at taking into account issues associated with the rare and critical resources used in the Group's products:

- a database, updated regularly and containing data sheets on each material, serves as the basis for carrying out risk analyses and seeking alternative resources. Discussions are held with suppliers to encourage them to limit the use of these resources and favor alternative and recycled resources;
- the Group has opened discussions with industrial operators in various sectors and public authorities to support the development of efficient channels to exploit the vast reserves of scarce resources contained within WEEE – veritable “urban mines” that may contain up to 40 times more recoverable minerals than there are underground.

4.2 Toward a lower impact on the environment and the climate

Environmental performance (energy)	Units	2019			2018	2017
		France ⁽¹⁾	Rest of the World	Group Values	Group Values	Group Values
Facilities presenting a risk						
Fuel tank units	units	1,369	2,668	4,037	4,255	4,228
Energy consumption - Scope 1						
Fuel oil (all buildings and all uses)	m3	12,825 11,763,00	47,684	60,509	66,931	72,163
Gas	m3	9	3,169,515	14,932,524	19,995,141	17,884,871
Coal	metric tons	na	51	51	56	71
Fuel	liters	21,180,72	12,244,899	33,425,624	36,040,004	35,253,976
- Gasoline-LPG for company cars	liters	4,181,827	4,038,301	8,220,128	5,997,432	3,408,576
- Diesel for company vehicles	liters	16,998,89	8,206,598	25,205,496	30,042,572	31,845,400
Total Energy Scope 1	GWh	480	705	1,184	1,340	1,373
Scope 1 CO ₂ emissions (energy only)	metric tons CO ₂	121,615	167,823	289,437	316,212	325,036
CO ₂ emissions from fuel oil, gas and coal	metric tons CO ₂	66,276	136,490	202,766	219,321	229,349
CO ₂ emissions from vehicles	metric tons CO ₂	55,339	31,333	86,671	96,891	95,687
CO ₂ emissions from greenhouse gases (refrigerants)	metric tons CO ₂	--	6,198	6,198	17,478	6,723
Scope 1 CO₂ emissions	metric tons CO₂	121,615	174,021	295,636	333,690	331,759
<i>Emissions avoided with external projects⁽²⁾</i>	<i>metric tons CO₂</i>		<i>(2,405)</i>	<i>(2,405)</i>	<i>(2,229)</i>	<i>(2,154)</i>
Energy consumption – Scope 2						
Electricity	GWh	2,246	2,138	4,384	4,357	4,299
of which renewable	GWh	--	542	542	526	493
- Electricity supply from renewable sources with certificate of guarantee of origin	GWh	--	482	482		
- Electricity supply from renewable sources from ESCo contracts or solar farms, or internal solar production	GWh	--	61	61		
- Electricity supply from renewable sources from PPAs	GWh	--	--	--		
Scope 2 CO₂ emissions	metric tons CO₂	117,473	889,572	1,007,045	1,043,144	1,001,900
Total energy consumption (Scope 1 and 2)	GWh	2,726	2,843	5,569	5,698	5,889
	metric tons					

For the third year in a row, in 2019 Orange reached its 2020 goal of halving its 2006 CO2 emissions per customer use (they fell by 64.2%) (down 61.2% compared with 2018). Furthermore, Scope 1 & 2 CO2 emissions were down from 2018.

This objective was defined on the basis of a sample of ten countries plus Orange Business Services, representing 84.5% of the Group's CO2 emissions.

The purchase of green energy with certificate of guarantee of origin in Spain and Belgium as well as the production of renewable energy by Orange on its solar farms are taken into account in the calculation of the indicator.

Indeed, the Group's Scope 1 & 2 CO2 emissions for these ten countries plus Orange Business Services fell by 4.6% in 2019 compared with 2018 (5.4% decline in Scope 1 & 2 CO2 emissions within the Group) as a result of sharply contrasting trends: it is mainly because higher emissions in France, Spain, Morocco and Senegal were more than offset the lower emissions in Poland and Jordan.

Increased emissions of 3.3% in France between 2018 and 2019 is due to higher emissions factors set by the International Energy Agency (IEA), but energy consumption actually fell by 0.7% over the same period.

In Spain, the consumption of fuel oil used on the back-up network and for rural off-grid sites increased in 2019, due to a change in the calculation methodology (revised estimates thanks to new data from suppliers) and due to an increase in the number of sites in rural areas not served by the national network (increased coverage of the Orange Spain mobile network), which impacts Scope 1 emissions upwards.

Orange Spain sourced all of its electricity consumption (scope 2) from renewable sources through certificates of guarantee origin (CGO) with its suppliers in 2019; considering the CO2 emission factor from Spain's energy mix, it corresponds to 25,996 metric tons of CO2 avoided in 2019, i.e. 7.1% of the Group's emissions (Scopes 1&2). Meanwhile, the reduction in CO2 emissions (down 5.5% between 2018 and 2019) in Poland, thanks to the reduction in energy consumption (down 2.7% between 2018 and 2019) has been magnified by lower factors set by the IEA for Poland.

In Jordan, Orange has profoundly modified its sources of electricity supply, by using its own solar energy resources up to 52.3 GWh, corresponding to 62% of Orange Jordan's total electricity consumption in 2019. The commissioning of three solar farms in 2019 allows releasing a full year capacity corresponding to 70% of the electricity needs estimated for Orange Jordan in 2020.

Considering the CO2 emission factor from Jordan's energy mix, it corresponds to 25,996 tons of CO2 avoided in 2019, i.e. 2.0% of the Group's emissions (Scopes 1&2).

It should be noted that in 2019, Orange Belgium used electricity from renewable sources for all of its electricity consumption (Scope 2) through consumption contracts with Guarantee of Origin (GoO) from its suppliers; considering the CO2 emission factor from Belgium's energy mix, it corresponds to 17,750 tons of CO2 avoided in 2019, i.e. 1.4% of the Group's emissions (Scopes 1&2).

4.2.1 Network energy consumption

A massive energy action plan, Green ITN 2020, was undertaken in 2008 to reduce energy consumption related to the operation of networks and information systems, which account for 84.0% of the Group's total consumption and 81.6% of CO2 emissions (including network equipment in buildings). Implemented in most countries where the Group is active, this action plan enabled Scope 1 & 2 energy consumption to be restricted to a +0.1% between 2019 and 2018, despite uses continuing to increase (up 3.9% in the most representative countries selected for the Group's CO2 per customer use indicator).

For the 2 largest energy consumers of the Group:

- the change in energy consumption related to information networks and systems between 2019 and 2018 amounted to +3.8% for France, attributable to the increase in the number of mobile sites with the coverage of white areas and the continued deployment of 4G. From 2014 to 2018, the volume of data transported for mobiles had multiplied 7 times, and the energy performance during the same period had improved by 80% (i.e. quantity of electricity to transport 1 Gigabyte);
- the change in energy consumption linked to networks and IT between 2019 and 2018 amounted to -1.4% for Poland.

Thanks to this action plan, between 2010 and 2019, at least 5 TWh of electricity and 260 million liters of fuel oil were saved within the network and IT scope. These savings prevented the release of at least 2.7 million metric tons of CO2 over the period.

These results were made possible by a series of measures introduced, particularly increased cooperation with equipment suppliers with a view to developing and obtaining highly energy-efficient telecommunication equipment by 2020.

In 2019, Orange continued its efforts to reduce the energy consumed by its cooling systems significantly. To this end, effort has gone into liquid cooling systems, a technology which allows heat dissipated by telecoms equipment and servers to be collected as close

as possible to the components, without needing to cool the liquid beforehand using a cooling system, and also allows some of that energy to be reused for office heating.

At Orange's initiative, a European standard has been developed to speed up the development of this technology. In addition, water-cooled network equipment has already been deployed at an equipment bay level with very promising results.

The Group is rationalizing its Data centers, virtualizing servers and renewing the most energy-consuming equipment in order to benefit from new, less energy-consuming technologies. In France, following the example of the first eco-efficient Data center commissioned in 2012, Orange has undertaken large-scale work to build two new data centers, which will replace ten sites across the country. At equivalent capacity, the eco-efficient data center consumes 30% less than the old ones.

In light of the need to prioritize the procurement of the most energy-efficient equipment, research has gone into measuring the amount of energy consumed by servers in relation to the service they provide. Several scientific papers have been published on the topic. The goal is to develop an energy consumption model for data centers.

Following the 400 V DC energy supply pilot project launched in 2017, Orange France has implemented this model when building new facilities or upgrading existing ones.

In Africa and the Middle East, Orange continued rolling out solar power at the radio sites in the region, with more than 2,800 sites operational in 2019.

Orange is also working with energy service companies (ESCOs) throughout the Middle East and Africa. The aim is to outsource investment, installation, modernization and operational management of the electrical generation infrastructures with a view to optimizing electricity consumption, supply reliability, its environmental impact and energy expenses. These projects have been implemented in the Democratic Republic of the Congo, Niger, Guinea Conakry, Côte d'Ivoire and Burkina Faso and in 2019 in Sierra Leone, Central African Republic and Liberia. This reduces fuel consumption by up to 80% (depending on the site).

4.2.2 Other energy consumption

4.2.2.1 Reducing emissions from buildings

Tertiary buildings account for 10.1% of the Group's energy consumption and 11.7% of CO2 emissions, down by 15.9% compared with 2018.

In France, the energy action plan covers all aspects of buildings: heating, ventilation, air conditioning, lighting, etc. The installation of meters that measures multi-fluid use continued to expand, and now covers 140 of the largest service and mixed sites. Audits and inspections of service providers continued, in order to identify opportunities to optimize the energy management of a building. In 2019, Orange cemented its real estate energy and environmental policy with the renewal of its ISO 50001 certification and a newly operational HQE Global Management System. Orange was awarded once again in 2019 by winning first place at the IFPEB's CUBE 2020 Contest (French Institute for Building Efficiency).

In all European countries, tools for measuring the energy consumption of computer and office equipment have been set up so as to optimize energy consumption. Since optimization policies were established in 2015, several countries have reduced this equipment's energy use by 30%-50% due to better control of the equipment, in particular outside working hours.

4.2.2.2 Reducing transport emissions

Business travel accounts for 5.9% of the Group's energy consumption, down by 8% compared with 2018, and 6.7% of CO2 emissions. Using electrified vehicles, limiting business travel, and promoting cooperative and responsible modes of transport: Orange is exploring innovative technological and people-oriented solutions to reduce its emissions.

The Group has a large fleet of company vehicles in Africa and especially in Europe, with France representing three-quarters of the Group's fleet.

The size of the fleet in France has been constantly decreasing by an average 3.5% per year since 2015, down to 17,500 vehicles at the end of 2019, with the aim of continuing this decrease by around a thousand vehicles by 2025. In France, Orange is now making the renewal of its fleet mandatory by eliminating Diesel technology, which emits fine particles (NOx), and boosting the deployment of electrified vehicles to control its CO2 emissions.

At the end of 2019, Orange was using more than 900 electrified vehicles. More than 600 recharging points had been networked this year on nearly 200 Orange sites, enabling the supervision and administration of the charging stations in question. Each user of Orange's rechargeable electric vehicle has a web tool and a mobile application including the mapping of these charging stations and the possibility of booking them. Finally, these very vehicles are equipped with cards giving them access to a network of 15,000 public charging stations.

Launched in 2013 with around 100 vehicles, the car-sharing fleet had 2,600 dedicated vehicles at the end of 2019. Orange owns the biggest car-sharing fleet in France.

Furthermore, several Group entities have introduced plans to limit the use of private cars (company travel plans, carpooling, car-sharing, road risk management and eco-driving training courses, etc.).

Employees moreover have solutions allowing them to reduce business travel (videoconferencing and other tools for remote collaborative work). Orange has around 270 video conference rooms in France and close to an additional 100 in the rest of the world. The usage rate for these rooms is globally around 15%.

5. Support for suppliers and subcontractors

At Group level, a responsible purchasing policy continues. The progress of the approach led Orange to rethink its monitoring KPIs in 2019: indeed, the focus on the introduction of the CSR clause in the new contracts signed (or renewed) during the year became widespread and the buyers' training program on CSR issues in the supply chain is now an integral part of the Group's processes. Monitoring the implementation of CSR in purchasing within the Group currently covers a scope of 27 entities.

	2019	2018
entities that declared having introduced the CSR clause in more than 80% of the contracts signed	100%	70%
% of contracts signed including the CSR clause	96%	
entities that trained more than 80% of their buyers	93%	62%
% of buyers having followed dedicated CSR training during the last two years	96%	

5.1 New supplier assessment program for the subsidiaries of Orange

In January 2019, Orange defined a new supplier assessment program oriented towards local suppliers, which is gradually being integrated by the subsidiaries. Its main objective is to increase the visibility of suppliers' CSR performance in order to mitigate risks better and support those who must strengthen their efforts on the path of sustainability.

This new initiative involves the assessment of local suppliers belonging to the high-risk category, with a significant annual order value. In order to guarantee the independence and quality of the CSR analysis, supplier assessments were entrusted to a partner recognized in this field, whose methodology is based on international CSR standards and guidelines such as UNGC, ISO26000, ILO or GRI.

In 2019, nine entities participated in this program, including Orange France, Orange Spain, Orange Slovakia, Orange Moldova, Orange Jordan, Orange Egypt, Orange Cameroon, Orange Madagascar and Orange Bank. All these entities started assessments of local, high CSR risk suppliers. In that year, 84 assessments were carried out among existing suppliers of Orange, apart from the 39 assessments that are underway. Among the suppliers already assessed, 31 (i.e. 37%) were identified as requiring an improvement in CSR performance. For these suppliers, the subsidiaries of Orange systematically request corrective action plans, and monitor them until these are completed.

In France, the approach was tested in the first half-year of 2019, after training buyers in collaboration with our partner, and then generalized in the second half-year of 2019. This first assessment (or reassessment) campaign focused on suppliers in the category of high CSR risk purchases under local contracts. During the assessments carried out at the time of calls for tenders, specific additional questionnaires can be sent to verify certain points of compliance, in particular.

5.2 On-site JAC audits

In addition to its coordinated on-site CSR audits using its own resources, Orange works alongside other operators via the JAC (Joint Audit Cooperation). The JAC took a new dimension since 2018 with the JAC Academy, a body whose objective is to train suppliers in the JAC's auditing methodology and incorporate it into their supply chains.

In 2019, JAC conducted 124 audits, including 71 on-site audits directly by the JAC, 20 by suppliers under the JAC Academy, 13 according to the VAP & FLA standard (Validated Assessment Program, Fair Labor Association) and 20 studies with workers, specifically on their working conditions. Audits of Tier-4 suppliers were conducted.

The JAC's on-site audits resulted in 567 corrective action plans, of which 43% addressed occupational health and safety requirements, 31% other working conditions, 10% business ethics and 16% the environment – affecting about 304,700 employees. 2019 closed 825 action plans relating to the current year or previous years.

Since 2010, the JAC has conducted a total of 639 audits in 37 countries (86% of the audited production facilities are located in Asia), improving the working conditions of around 1.3 million employees.

5.3 On-site audits in the MEA region

In 2019, 12 on-site audits were carried out by Orange and its subsidiaries in the MEA region, concerning local suppliers identified as potentially at high CSR risk. Many of them have resulted in the establishment of a corrective action plan to be carried out by the supplier, monitored by Orange.

6. Result of indicators introduced to monitor and assess measures

	Risks	governance	indicator	2019	2018
Lack of or faulty Vigilance Plan	1. Lack of risk identification in its operations and in those of its suppliers (risk mapping)	GCSER Ethics Committee Cross-functional steering group CSR & Procurement Steering Committee	Implementation of Group mapping in the entity	56%	4%
	2. Failure in the design of preventive measures	GCSER Ethics Committee Cross-functional steering group	approval of the Plan in the entity's governance bodies (monitoring on the European scope)	71.4%	
	3. Failures in the implementation of preventive measures: execution of operations and processes (control systems)	GCSER Ethics Committee BoD or Management Committee of Entities Cross-functional steering group	approval of the Plan in the entity's governance bodies (monitoring on the European scope)	71.4%	
	4. Failure to provide evidence to authorities on time	Ethics Committee BoD or Management Committee of Entities Cross-functional steering group	appointment or designation of the person responsible for the Vigilance Plan in the entity (broadened SOX scope)	96%	
Human health, safety and security	1. Physical or mental disability (death, occupational accident, occupational illness, disability, etc.)	GCSER ExecComm DPQVT CGM CSE	Frequency rate of occupational accidents (number of occupational accidents with lost time per million theoretical working hours)	3.0%	3.3%
	2. Deterioration of working conditions jeopardizing human health, safety and security	GCSER ExecComm DPQVT CGM CSE	employee barometer: % of employees for whom "Orange provides a working environment guaranteeing health and safety"	84.3%	83.4%
Abuses of Human rights and fundamental freedoms	1. Modern slavery or human trafficking within the framework of a known established contractual relationship	GCSER Ethics Committee CSR & Procurement Steering Committee	number of action plans in the areas handled by the Joint Audit Cooperation	11	8
	2. Non-decent working conditions at suppliers' and subcontractors': compensation that does not allow an adequate standard of living, right to rest, etc.	GCSER Ethics Committee CSR & Procurement Steering Committee	number of action plans in the areas handled by the Joint Audit Cooperation	149	119
	3. Infringement of the child's right to harmonious education and development: prohibition of child labor, protection against content unsuitable for a young audience	GCSER Ethics Committee CSR & Procurement Steering Committee	number of action plans in the areas handled by the Joint Audit Cooperation	9	12

	Risks	governance	indicator	2019	2018
	4. Infringement of the freedom of association and right to collective bargaining on working conditions	GCSER Ethics Committee CSR & Procurement Steering Committee	number of action plans in the areas handled by the Joint Audit Cooperation	7	7
	5. Any act of discrimination: recruitment, work, salary, diversity, unfair procedures	GCSER Ethics Committee CSR & Procurement Steering Committee	number of action plans in the areas handled by the Joint Audit Cooperation	140	22
	6. Breach of the freedom of expression (in civil society)	GCSER Ethics Committee CSR Department	number of disconnection requests received from authorities	10	10
	7. Violation of privacy	GCSER Ethics Committee CSR Department	number of customer data interception requests received from authorities		337,921
Environment	1. Inadequate treatment of toxic waste (poles, batteries, etc.)	GCSER Ethics Committee Circular economy committee	% of hazardous waste recovery	98.2%	98.6%
	2. Ineffective collection of used equipment (WEEE)	GCSER Ethics Committee Circular economy committee	% of mobiles collected in Europe	16.3%	15.5%
		GCSER Ethics Committee Circular economy committee	Box collection rate	Approx. 90%	
	3. Circular economy (4R) not implemented in businesses (Marketing and Networks)	GCSER ExecComm Ethics Committee Circular economy committee	% progress on the roadmap of the Strategic circular economy committee	91%	
	4. Failure to adapt to a 2°C world (related financial risks)	GCSER ExecComm Ethics Committee	CO2 emitted in tonnes	1302681	1376834
		GCSER ExecComm Ethics Committee Circular economy committee	Percentage of renewable electricity used	26%	--

GCSER: Governance and Corporate Social and Environmental Responsibility Committee
DPQVT: Risk Prevention and Occupational Quality of Life Department
WWC: Worldwide Works Council
OHSWCC: Occupational Health & Safety and Working Conditions Committee
CPGEC: Group Circular Economy Steering Committee
ExecComm: Group Executive Committee

7. Conclusion

In terms of monitoring the implementation of the plan across entities, 2019 was a pivotal year, with the introduction of a new system of governance reporting to the highest decision-making bodies (Executive Committees and Boards of Directors), a network of managers for each entity or subsidiary supported by Group networks that are already operational (Internal Control and Risk Management, Compliance, HR, Legal, Purchasing etc.) and the use of shared resources. Given the Group's size, its multiple sites and large number of suppliers, the challenge of implementation has been successfully met as part of a process of continuous improvement.

The monitoring of operational implementation on this basis must be on a new scale for the new 2020 plan and indicators measuring the effectiveness of measures taken must be refined to more comprehensively reflect the scope of the actions plans implemented.



**www.orange.com/RSE
[@OrangeRSE](https://twitter.com/OrangeRSE)
gallery.orange.com**