



Bolloré Group Human Rights Charter

PREAMBLE

Arising from a long tradition in papermaking, the Bolloré Group has proved able to develop over the last two centuries, adapting itself and transforming its business lines. The Group is currently present in the transportation and logistics, media and communications and electricity storage sectors. This diversification of activities has also been accompanied by significant international development, with a presence on all continents.

This development has been possible thanks to its ownership and family culture, which enabled it to see its activities from a long-term point of view and invest in innovative projects in complete independence. Of the six Group values that have guided its development, respect for individuals is a factor that enables a sustainable business and is a creator of value, and which is increasingly seen in new expectations extended to include respect by companies for all human rights across the entire value chain.

In response to the new requirements of regulators, investors, clients and all stakeholders and in order to ensure that the development of its activities contributes to upholding human rights, the Group has adopted this charter which formalizes its commitments in this area.

These commitments require the Group and its divisions to implement appropriate due diligence measures to identify, prevent and mitigate risks of serious breaches as well as to report the results. They are also aimed at embedding the policy in the Group's constant search for a positive societal contribution across the value chain and the areas where it operates.

To achieve this ambition, the policy is based on a division of roles between :

- the Group - its role incorporating awareness-raising, training, mobilization, articulation, pooling and reporting managed by the Group CSR department;
- the divisions and subsidiaries - with responsibility for operational implementation, incorporating the specific features of their businesses, the requirement to adapt to areas of operation and local emergencies managed by a human rights officer, reporting to their Executive Managements.

Cyrille Bolloré
Chairman and Chief Executive Officer

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April 2019

OUR COMMITMENTS

To uphold international standards

In addition to complying with local regulations, the Bolloré Group undertakes to carry out appropriate due diligence based on international standards on human rights and in particular:

- the International Human Rights Charter.
- United Nations Guiding Principles on Business and Human Rights.
- OECD guidelines for multinational enterprises.
- International Labor Organization's Fundamental Conventions.

Moreover, the Group has signed the United Nations Global Compact whereby it undertakes to uphold human rights through its international operations and to ensure it is not complicit in violations of those rights.

Given the extent of its operations on the African continent, the Bolloré Group is also a signatory to the charter of the French council of investors in Africa (CIAN).

This charter dedicated to human rights is complemented by the Group's commitments as set out in *its Diversity and Inclusion Charter*, dedicated to applying the principle of non-discrimination in all its forms, accommodating and integrating people with disabilities, gender equality at work and supporting young people in entering the workplace.

Our priorities

The Group and its divisions have systems in place dedicated to the health and safety of its employees and service providers working on its operational sites, as well as various action plans aimed at particularly vulnerable groups through) in particular the activities of its Fondation de la 2^e chance dedicated to tackling exclusion and offering access to free medical care for families of employees or the provision in Africa of infrastructure allowing access to the internet, culture and training, thus contributing to the emancipation of young people.

Nevertheless, new standards and societal expectations in terms of human rights raise wider and more complex issues. They require the Group to gradually embed a due diligence approach across its operations, steered towards taking into account any interests of third parties who might be affected by its activities.

In this context, a Group-wide review enabled us to identify two major categories of human rights challenges across all divisions and a shared ambition, where our activities can have a significant impact:

1. Upholding workers' rights across our entire value chain

The Group employs over 80,000 employees for its activities and calls on numerous partners, suppliers and subcontractors whose activities are liable to have an impact on the fundamental rights of workers. As such, in addition to the measures in place for its own employees, the Group intends to undertake appropriate due diligence with regard the employees of its suppliers and subcontractors, particularly in relation to the following issues:

- **health and safety** - this issue includes drawing up health and safety policies to cover anyone working on-site, supplying appropriate equipment, providing employees with regular safety training and introducing systems for reporting accidents and illness;
- **pay** - this issue includes, in particular, compliance with local legislation on the minimum wage, paying a wage that corresponds to the number of hours actually worked, equal pay and the regular payment of wages within a reasonable timescale;

- **working time and paid leave** - this issue includes, in particular, compliance with local legislation on overtime pay, daily breaks, a weekly rest day ¹and parental leave;
- **staff representation** - this issue includes compliance with national legislation on freedom of association and the right to collective bargaining. In the case of legal restrictions, the Group undertakes to facilitate the expression of employees and guarantee the absence of discrimination of workers involved in such representative structures;
- **any form of discrimination** (see *Diversity and Inclusion Charter*);
- **forced labor and underage workers** - this issue includes, in particular, compliance with local legislation on the minimum working age, the ban on hiring under-15s and on hiring under-18s for any so-called hazardous work, and the signature of an employment contract specifying the job description.

2. Upholding the fundamental rights of communities and residents in proximity to our activities.

Many of the Group's operations are liable to have an impact on local communities and neighboring populations of operating sites. The issues are particularly significant in developing countries where it operates.

Subjects requiring particular vigilance include:

- **health and safety** — these issues include, in particular, access to treatment, the surroundings of vehicle access routes and infrastructure safety services;
- **social issues** — these issues include, in particular, training and local recruitment;
- **environmental issues** — these issues include, in particular, preventing impacts such as noise pollution, air quality, access to drinking water and natural resources;
- **land issues** — these issues include, in particular, seeking to design and develop projects with limited impact on land, arrangements for compensation and relocating affected populations;
- **local community engagement** these issues include, in particular, the right to free, informed consent, the right to have one's needs heard and access to a complaints handling procedure.

3. Constantly striving to give back to society

In adopting this charter, as part of a commitment to a process of continuous improvement, the Group undertakes to put in place all reasonable, appropriate means to optimize its positive impact on human rights, across its entire value chain.

With this in mind, the Group is committed to the United Nation's Sustainable Development Goals (SDGs) and in particular the following goals by 2030:

"Ensure that all men and women, particularly the poor and the vulnerable, have equal rights to economic resources, as well as access to basic services, ownership, and control over land and other forms of property, inheritance, natural resources..." (SDG 1.4)

"Take immediate and effective measures to eradicate forced labor, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labor, including recruitment and use of child soldiers, and by 2025 end child labor in all its forms." (SDG 8.7)

¹ Notwithstanding specific rules relating to a particular situation or job.

"Protect labor rights and promote safe and secure working environments for all workers, including migrant workers, in particular women migrants, and those in precarious employment." (SDG 8.8)

"Empower and promote the social, economic and political inclusion of all, irrespective of age, sex, disability race, ethnicity, origin, religion or economic or other status." (SDG 10.2).

All commitments expressed in this charter are principles which must be upheld by all Group employees. Failure to do so may be treated as misconduct, giving rise to the relevant disciplinary and / or legal proceedings in accordance with the applicable laws and the Bolloré Group's internal rules.