

ETHICS AND CSR CHARTER





"The Bolloré Group is committed to preventing and mitigating the impacts and risks associated with its activities, and generating positive social and environmental impacts"

Message from the Chairman

For over 200 years, the Bolloré Group has built itself on the talents of people who share the Group's vision and thrive in driving the Group's operations. Bolloré employees are united by the core values of modesty, excellence, courage, solidarity, agility and innovation.

Their professional growth and fulfilment is one of the three strategic axes of the Ethics and CSR Charter that you are holding. Aware of our responsibility to leave future generations a "habitable" world, we are committed to the roll-out of innovative products and services that reduce our carbon footprint. And because we are committed to acting with integrity, we apply strict rules in the way we conduct our business. The Group places ethics and its social and environmental responsibility at the heart of both its strategy and its corporate culture.

The sincerity of the commitments outlined in this Charter is based on our in-depth understanding of our industries and the value chain in which they operate. We are keenly aware of our responsibility and the operating constraints we must confront. We are also aware of the governance challenges that can be a barrier to the most fundamental human rights and environmental protection.

The Bolloré Group is committed to preventing and mitigating the impacts and risks related to its activities, and generating positive social and environmental impacts that benefit all our stakeholders.

This Ethics and CSR Charter renews our commitments. Each and every one of us has a duty to abide by it. It is crucial to our reputation and our future and I know I can count on all of you to apply it in the daily conduct of our business.

Cyrille Bolloré

Chairman and Managing Director of the Bolloré Group

A stylized, handwritten signature in blue ink, representing Cyril Bolloré.

Preamble

For 200 years now, the Bolloré Group's strategy of steady innovation, its ability to adapt and diversify, and its desire to expand internationally, have enabled the Group to secure its foothold in its three business lines: oil logistics, communications, and industry.

In a business environment that is undergoing a profound shift, the Group is affirming its desire to meet the ethical, social and environmental challenges that will determine the prosperity and sustainability of its activities. The Bolloré Group firmly believes that the criteria shaping customer and investor preferences, along with its teams' pride in belonging to the Group and the trust placed in it by stakeholders, will increasingly hinge on its non-financial performance.

This Ethics and CSR Charter establishes the Group's major commitments in support of sustainable and inclusive development. Whether the Group responds appropriately to these complex challenges will be determined by the implementation of vigilance cycles that assess whether its actions are reasonable and effective.

In addition to complying with regulatory requirements, the standard framework that guides this Ethics and CSR policy incorporates the principles of the International Bill of Human Rights, the guiding principles issued by the UN, the OECD and the ILO, the ISO 26000 guidelines, the principles of the Global Compact as well as the Sustainable Development Goals of the United Nations.

The Group thus intends to utilize all the appropriate resources to ensure the fulfilment of these commitments based on robust vigilance cycles, designed to be shared with all its stakeholders. As such, this charter, which is being made available to the public by all suitable means, is an integral part of the rules that govern our business relationships.

The commitments described herein unite the employees across the different entities enabling them not only to safeguard these commitments but also to perform their duties in full awareness of their rights and obligations to the Bolloré Group and its stakeholders.

Shared commitments

Through this charter, the Bolloré Group undertakes to:

- **identify**, prevent and mitigate the social and environmental risks associated to its own activities as well as those of its stakeholders, across the entire value chain;
- **roll-out** all necessary resources to effectively manage the risks associated to its activities. And to optimize its actions as it continually strives to make positive economic, social, ethical and environmental impacts;
- **incorporate** the commitments of this Charter into a dedicated CSR policy guiding its teams and partners in their day-to-day actions, throughout the countries it operates in;
- **consult** with and take into consideration the expectations of its stakeholders;
- **Ensure** that whistleblowers are carefully listened to and properly protected;
- **share** the results of the policies implemented as part of the correct reporting of non-financial information (in the context of the sustainability report).



Three strategic axes

This Ethics and CSR Charter sets out the Bolloré Group's commitments, which are broken down into three strategic axes:



Environment

Adapting to climate change by innovating our products & services and mitigating our carbon footprint.



Social

Uniting, protecting and developping/training employees, the Group's strongest asset, in an attractive and inclusive environment, across our value chain.



Governance

Acting with integrity in our business conduct, in accordance with the values and principles shared by all our employees and stakeholders.

Our Commitments

ENVIRONMENT



**Adapting to climate change
by innovating our products & services
and mitigating our carbon footprint.**



Protecting the environment

To anticipate major climate and societal changes and support the adaptations necessary for sustainable development, the Bolloré Group is rolling out mitigation measures and investing in the long term in order to deliver innovative and connected low carbon products and services.

With the aim of harmonizing its products and services towards environmental protection, the Bolloré Group undertakes to:

→ engage in every effort to **preserve the environment from the negative impacts of its activity through reduction and mitigation measures;**

→ **continuously improve** the environmental performance of its products and sites. This includes monitoring its environmental impact by measuring its consumption of natural resources and its emissions;

→ **implement strategies for the mitigation of climate change**, in particular through mitigation and adaptation plans (energy efficiency, use of renewables, etc.);

→ **integrate environmental issues** into its investment strategy;

→ **develop innovative and low-carbon products & services** that contribute to the energy transition;

→ **promote the efficient use of natural resources** and develop the circular economy by implementing waste recovery and recycling measures;

→ strengthen traceability measures of our products & services and improve transparency to **promote any environmental verification and certification**;

→ implement measures to protect and **restore biodiversity**;

→ **Enhance communication and cooperation** with stakeholders on environmental topics.



SOCIAL



Unite, protect and develop our employees' potential, by guaranteeing them an inclusive and appealing working environment including across our value chain.



Social policy

The extent to which all our employees thrive, as well as their engagement and performance is directly linked to Bolloré Group's success.

The Bolloré Group undertakes to:

→ **promote ongoing, first-rate social dialogue** with its employees;

→ **encourage the growth** of all its employees and **strengthen** their employability in particular by guaranteeing them access to training and skills development;

→ **guarantee its employees a healthy and safe working environment** ;

→ **ensure respect for workers' rights** across its value chain complying with the highest standards promoted by the international organizations;

→ **enforce an equitable, motivating compensation policy** in line with the local economic context;

→ **offer an effective social welfare policy**;

→ **guarantee recruitment** and development processes that promote equal opportunities ;

→ **combat all forms of harassment and discrimination** and promote inclusion and diversity;

→ **implement measures to promote gender equality**;

→ **take action to promote the employment and inclusion** of people with disabilities;

→ **engage in social and solidarity actions** through a committed sponsorship policy.

To learn more about the Bolloré Group's commitments to combating discrimination, visit the Bolloré Group website

To learn more about the Group's societal commitments, click here:

deuxiemechance.org

earthtalent.net

foyerjeanbosco.com



GOVERNANCE



**Acting with integrity in our business conduct,
in accordance with the values and principles
shared by all our employees and stakeholders.**



Corporate governance

The Bolloré Group is committed to an ethics policy based on commitments shared by all its subsidiaries. It makes every effort to institute a governance framework that guarantees ethical practises that respect human rights in its business conduct.

As part of its compliance approach, the Bolloré Group:

- **condemns** influence peddling, corruption, and any behaviour consisting of offering, requesting or granting illicit undue benefits and/or payments to obtain and/or retain a contract, or any other illegal benefit;
- **condemns** anti-competitive practices;
- **ensures compliance with** economic sanctions plans;
- **combats** tax evasion;
- **maintains relationships with the authorities** that comply with its ethics policy;
- **publishes** clear specific information;
- **reports the measures** implemented to ensure compliance with its commitments.

As part of its vigilance policy, the Bolloré Group undertakes to:

- **identify and prevent** environmental breaches, breaches of human rights and of people's health and safety;
- **respect** the fundamental rights of the local residents where it conducts its business;
- **constantly strive** to make a positive societal contribution for its stakeholders;
- **ensure** compliance with these commitments in its value chain via the implementation of appropriate vigilance processes with its trading partners (customers, partners, suppliers, subcontractors, etc.);
- **raise awareness** of these issues among its employees.

These commitments are set down in the Bolloré Group's Code of Conduct, which requires all its agents, employees

and trading partners to act with integrity in all circumstances in order to safeguard the Group's reputation.

The Group encourages its stakeholders to report any breach through the procedure in place for this purpose: alert.bolloré.com

To learn more about the Bolloré Group's Human Rights commitments, visit the Bolloré Group website.



Scope

Scope and Implementation of the Charter

The provisions of this charter **are enforced across the Bolloré Group and all subsidiary companies** in which it is the majority shareholder within the meaning of French law, and among **all employees of these subsidiaries**.

The proper implementation of the Ethics and CSR Charter across all the Group's entities is monitored by the CSR Department, reporting to the Finance Department, and by several governance bodies: the Ethics, CSR and Anti-Corruption Committee, the Risk Committee, and the Audit Committee which validates the major strategic orientations and submits them to the Board of Directors for approval.

This Ethics and CSR Charter is the **foundation of the Bolloré Group's policy**, and is supplemented by its General Code of Conduct, which is signed by its employees, and the delineation of topic specific policies, procedures and action plans.

Each Group entity shall ensure that **all of its employees familiarize themselves with these commitments** through the appropriate channels.

This charter does not replace the legal provisions but rather is intended to **supplement** them, without being exhaustive. It is **shared with anyone belonging to the Group**, upon their hiring, and is made available to the public by all appropriate means. **It is notably an integral part of the rules governing our business relationships.**





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