

2. Duty of care plan of the Bolloré Group

2.1. Introduction

2.1.1. LEGAL CONTEXT

In 2017, France expanded its regulations to include a new duty of care law pertaining to parent companies and order-giving companies. The objective of the duty of care law is to extend the liability of transnational corporations so as to forestall and avoid catastrophes such as what happened at Rana Plaza in Bangladesh in 2013. The companies affected by the law must draw up a "duty of care plan". The law operates in several areas where serious offenses may arise from the activities of a company or its supply chain:

- human rights and fundamental freedoms;

- personal health and safety;
- the environment.

The law affects subsidiaries directly or indirectly controlled by the parent company, along with the activities of suppliers and subcontractors with whom there is an established business relationship.

2.1.2. BOLLORÉ GROUP MISSIONS

With a sustainable presence nearly two centuries old, and one of the world's largest companies, the Bolloré Group has strategic positions in three business sectors: transportation and logistics, electricity storage and systems, and communications.

- Through its transport and logistics activity, the Bolloré Group is an important player in economic development, the opening up of regions, and the circulation of goods, offering an essential, even vital service, in that it provides an offering that makes it possible to import and export goods, even in the most isolated areas. This integrated logistics network is a real driver for the industrial logistics transformation of certain regions.
- Through its activities in electricity storage solutions and systems, the Bolloré Group develops innovative and sustainable solutions to offer a response

consistent with the challenges posed by climate change, particularly in terms of access to energy.

- Its communications activities are managed by the Vivendi group.

These activities involve both adaptability and a solid foundation to offer consistent and optimal quality of service regardless of the context, in line with the Group's value of excellence. The Bolloré Group is nevertheless aware of the potential impacts that the conduct of its activities may have on the environment and the day-to-day life of its stakeholders.

This is why, through its due diligence approach, the Group aims to identify and control its impacts in order to prevent – and if necessary correct – situations at risk, and maximize positive externalities, with a view to sustainable and shared development.

2.1.3. SCOPE OF ACTION OF THE BOLLORÉ GROUP'S DUTY OF CARE PLAN

In accordance with the law, the scope of the Bolloré Group's duty of care plan applies to:

- the subsidiaries of the transport and logistics activities, covered by the Bolloré Transport & Logistics division, which consists of four business units (Bolloré Energy, Bolloré Ports, Bolloré Logistics, and Bolloré Railways);
- the subsidiaries of the electricity storage and systems activities, which consist of the Brittany division, which includes the Group's industrial activities (Blue Solutions, BlueBus, Plastic Films), and the Blue Systems division (IER, Polyconseil).

The following are excluded from the plan:

- Vivendi: Vivendi's CSR Department relies on its own ethics and duty of care plan, applicable to its companies, and adapted to their business lines (see Vivendi's 2020 universal registration document – 3.2.2 Duty of care system). For more information on the Group's activities, see chapter 1 – Presentation of the Group and its activities.
- Financial investments: note that in accordance with the law, the Bolloré Group's duty of care plan does not apply to companies in which it has a holding that does not give it control within the meaning of article L. 233-16 of French commercial code (*Code de commerce*). Nonetheless, whenever it

can, as a responsible shareholder, the Bolloré Group exercises its reasonable duty of care, notably within the Socfin group. The Board of Directors meetings provide an opportunity to give an overall update on the progress made by Socfin on the consideration of the social and environmental impacts linked to its activities. As is evident in the latest statements by the Belgian NCP, the measures put in place provide effective responses, in particular for the resolution of disputes with the communities, notably Socfin group's commitment to have all of its African plantations certified based on the RSPO standard and the partnership with the Earthworm organization (formerly TFT). The submission of information on the subject through the website and Socfin group's sustainable development report are proof of its transparency policy enabling monitoring of its progress. And while it looks like the terms of the Socapalm action plan to which the Group had contributed have not translated, on the ground, into something entirely satisfactory in the eyes of certain stakeholders, the Group shares the opinion expressed by the Belgian NCP in its statement of November 26, 2018, which says that establishing trusting relationships between the parties in the field is a process that will take several years.

2.2. Methodology

The duty of care plan is prepared at the level of the Group CSR Department, which is responsible for researching and drawing up the plan, and the analyses and recommendations that must then be applied by the subsidiaries and business lines concerned by the risks identified – notably the Purchasing, QHSE, CSR, Legal Affairs, Human Resources, and Compliance Departments. It presents the general system and approach used to establish and strengthen its culture of care, applied daily by its employees. The illustration in operational activities is explained within the risk management frameworks (policy, action plans, highlights, indicators), published in the Group's non-financial performance statement (EFFS), whose information is verified and audited annually by an independent third party organization. More than a reporting exercise, the Bolloré Group's EFPS describes the risks, action plans, measures and indicators put in place to ensure that social and environmental issues are managed.

The duty of care plan is updated on a regular basis to present the new tools and processes developed to deploy the Group's due duty of care approach across all its activities and its value chain.

It is based on its ethical framework, based on two core documents: the Group's Ethics & CSR Charter and its Code of Conduct, which was updated in 2020, as explained in the duty of care plan report below.

- **The Ethics & CSR Charter** lists the Group's commitments in terms of environmental, social and societal responsibility. It forms the basis on which more specific commitments are adapted, formalized by the Group's charters (Human Rights Charter, Diversity & Inclusion Charter, Responsible Purchasing Charter), distributed to all employees and also available online.

2 Bolloré Group non-financial performance

2. Duty of care plan of the Bolloré Group

- **The Code of Conduct** applies to all persons acting on behalf of the Bolloré Group, and sets out the expected behaviors, both in day-to-day operations and in sensitive situations. It formalizes recommendations to prevent, identify and report breaches, particularly through the professional whistle-blowing system (developed below).

The ethical framework is based on the following international standards:

- the United Nations Guiding Principles and the Principles of the Global Compact;
- the OECD guidelines;
- the International Charter on Human Rights;
- the International Labor Organization's core conventions;
- the recommendations of the French Anti-Corruption Agency.

2.2.1. GENERAL PRINCIPLES OF THE GROUP DUTY OF CARE APPROACH

Because of the nature and diversity of its geographical locations and of its activities, the Group's approach to duty of care is based on the following principles:

- ensuring the compliance of the Group and its business relationships with the most relevant international standards and local legislation in force, when this is more demanding;
- paying particular attention to its employees, suppliers and subcontractors, notably through duty of care concerning working conditions and high standards of health and safety for all;
- preserving the environment through measurement of the impact of its activities and those of its business relationships as well as setting up actions to protect against and mitigate environmental risks;
- applying particular duty of care to safety conditions and respect for the fundamental rights of the users of the Group's products and services and people living near our sites of activity.

These principles reflect the Bolloré Group's ambition to operate in line with the best international standards and in accordance with its CSR commitments, the aim of which is to guide all employees and business partners around a common set of values. They are adapted through concrete measures, formalized as part of a methodology based on a continuous improvement approach. In addition, to optimize its approach, the Bolloré Group has identified its priorities for concentrating efforts in terms of action plans, geographical areas and resource allocation. This approach aims to achieve effective and transposable results which can be gradually applied to all of the Group's activities, wherever they are based, and also reinforce its reasonable care processes.

2.2.2. IMPLEMENTATION

2.2.2.1. DUTY OF CARE RISK MAPPING

The duty of care risks identified in 2017 when the Bolloré Group's first duty of care plan was developed were divided into three major families: health and safety risks for the men and women involved in our activities and our value chain, protecting human rights and fundamental freedoms, and protecting the

environment. To the extent that more than 96% of the Group's revenue comes from B-to-B services (excluding Communications) and not from production activities intended for consumers, the issue of the traceability of raw materials appears to be less material for the Bolloré Group.

DUTY OF CARE PLACED AT THE HEART OF THE GROUP'S CSR STRATEGY

These categories, consistent with the requirements detailed by the regulations, were confirmed in 2018, during the Group CSR risk mapping, carried out as part of the implementation of the requirements of the non-financial performance statement and proposing a more detailed classification (see chapter 2 – 1.1.2 Bolloré Group non-financial risk mapping). Duty of care risks have been incorporated into the Group CSR risk universe, listed by the members of the

Executive Committees and representatives of the support and operational functions, placing the duty of care at the heart of the Group's CSR strategy. For this reason, the CSR Department has therefore taken steps to detail the mitigation measures implemented for all these CSR and duty of care risks in its non-financial performance statement, as explained in the methodology section.

POOLING OF EFPS RISKS AND DUTY OF CARE CROSS-REFERENCE TABLE

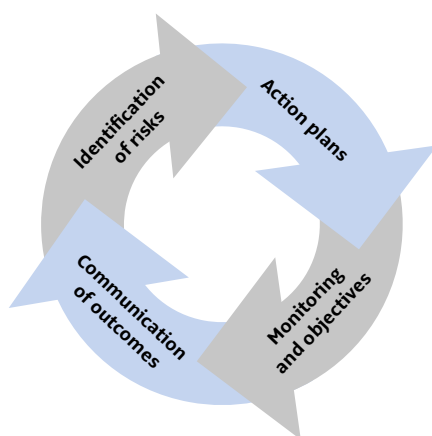
Categories of duty of care risks (duty of care plan)	Description of the risk	Risks identified in the Bolloré Group's non-financial risk mapping (EFPS)	Risk governance
Health and safety	The scope of the risk control framework is: Group employees, employees of its service providers, suppliers and subcontractors, as well as the users of its products and services and local communities. There is specific duty of care for maintenance and transport activities, and particularly rail transport. The control framework for the risks associated with these key issues is strengthened by appropriate and specific procedures. In addition, the Group applies constant vigilance, and rigorously monitors the health risks associated with the various regions where it has a presence, and deploys the necessary action plans and measures.	Health and safety of employees and third parties	General Management
		Attracting and retaining skills	QHSE Departments
		Working conditions and social dialog	HR Departments
Environment	Group activities can have multiple impacts on the environment: pollution of water, ground and air, sound and light pollution, direct or indirect greenhouse gas emissions. Since the transport and logistics activities involve high levels of energy consumption and greenhouse gas emissions, the Group has identified its carbon impact as a priority issue. Since the Group has no production activity, with the exception of its Blue Solutions subsidiaries, it consumes small amounts of raw materials. The prevention of pollution, environmental accidents which could damage the ecosystems essential for those living near the Group's activities and the limitation of its carbon footprint are regulated by target-based action plans, measures and procedures, which are proportionate to the potential environmental impact. The Group also incorporates climate challenges into its business strategy, particularly by having innovation as a mainstay of its approach, through the solutions offered by its electricity storage and systems subsidiary.	Local pollution and transport/storage of hazardous materials	General Management CSR Departments
Human rights and fundamental freedoms	Depending on the socio-economic, political and implementation context, the Group's activities may have an impact on human rights issues (discrimination, poor working conditions, child labor and forced labor, social dialog, etc.). The Bolloré Group has identified the three most material aspects of its activity, for which it commits to deploy due diligence: the fundamental rights of workers, the fundamental rights of local communities and the contribution to a positive societal footprint. It has formalized an approach to refine the identification of these risks for its entities (see chapter 2 – 1.2.2.2. Promoting human rights in our value chain/Formalizing the Group's progress plan). The risks associated with its supply chain are detailed in the duty of care report.	Promoting human rights in the value chain	General Management QHSE Departments HR Departments CSR Departments Compliance Department and Ethical Referents
		Health and safety of employees and third parties	Human Rights Steering Committee

2.2.2.2. EVALUATION PROCEDURES, PERFORMANCE MONITORING AND MEASURES IMPLEMENTED

Through annual non-financial reporting and the monthly QHSE reports within the divisions, more than a hundred indicators of resources and results are monitored, adjusted and enriched each year, with respect to social, environmental, societal and governance issues. Shared and internally studied with a view to continuous improvement and performance monitoring, the most relevant data

are published in the EFPS. The collection process, updated by the integration of additional indicators, is optimized each year. Annual external audits related to the EFPS make it possible to validate the robustness of the data reported, illustrating the proper application of the Group's various risk management frameworks, based in particular on a duty of care cycle approach.

THE IMPLEMENTATION OF DUTY OF CARE CYCLES



When it built its duty of care mechanism, the Bolloré Group drew up a dedicated approach, in order to meet the key issues identified.

This duty of care cycle approach is based on four phases in the exercise of the duty of care: the identification of risks, the development of associated action plans, the monitoring of these action plans and the development of objectives, and the reporting of information on the results of the systems in place.

The approach ensures at each stage of the cycle that the appropriate choices have been put in place to provide reasonable and effective duty of care over the issues seen as priority issues. The performance evaluation of the measures deployed is coupled with corrective steps as part of continuous improvement. This method is also meant to make it easier to teach various audiences concerned about the duty of care procedures, involve them, identify improvements and adapt them where appropriate. The Bolloré Group explains this procedure in the report on its duty of care plan, with various examples below.

In addition, the preparation, implementation and roll-out of its whistleblowing system equip the Group with new tools to manage its duty of care approach and measure the performance of its approach.

2 Bolloré Group non-financial performance

2. Duty of care plan of the Bolloré Group

ESTABLISHING A WHISTLEBLOWING AND REPORTING SYSTEM

In 2018, the Compliance Department, the Human Resources Department and the CSR Department collaborated on revising the existing whistleblowing system, which now encompasses in one place both the issues of corruption and influence-peddling, and those of duty of care, which have been defined and detailed. Since the Sapin II law requires an alert system similar to that required by the duty of care law, both systems were developed on the same platform as a way to pool them and to comply with the requirement of the AFA and the CNIL. This whistleblowing system was the subject of consultations with employee representative bodies in 2019, and renewed in 2020 to adapt to the CNIL reference system on personal data processing intended for the implementation of a professional alert system.

Its deployment and the processes for collecting and processing reports are explained in the whistleblowing procedure, available on the Group's website. Whistleblowers' alerts are processed at the head office level and overseen by the Chairman of the Ethics – Anti-corruption and CSR Committee, which carries out its mission independently. Everyone can report an alert: the mechanism

allows any Bolloré Group employee, commercial partner or any individual whose interests are likely to be affected by the Group's activity, to issue an alert regarding any crime or offense, a serious and clear breach of the law or regulations, threat to the general interest or acts which go against the Group's Code of Conduct.

Alerts issued using the whistleblowing mechanism are screened for admissibility by dedicated contacts, depending on the nature of the alert. Where applicable, the alerts will be investigated in order to establish, within a reasonable time-frame, the materiality of the facts in question.

If an investigation makes it possible to establish the materiality of a reported breach and the involvement of the alleged perpetrators, disciplinary sanctions and/or legal proceedings are taken against the person(s) in question. The Bolloré Group guarantees confidential processing (see chapter 2 – 1.2.2.1. Sharing the same business ethics and ensuring compliance with the strictest standards).

THE DEFINITION OF A PRIORITY GEOGRAPHICAL AREA

While the Group's duty of care approach applies to its entire scope of operation, and extends to the activities of its suppliers and subcontractors, in order to optimize its approach, the Group has established a priority geographical area on which it concentrates its actions for the exercise of its duty of care.

The criteria adopted to define this area are:

- the number of employees;
- the presence of all activities in the region;
- the level of the human development index of the countries concerned.

The workforces of the subsidiaries located in these countries represent 80% of the Group's workforce outside the OECD.

This approach through the identification of the priority area, which is expected to evolve in light of ongoing projects in terms of refining the risk mapping, makes it possible to dedicate the appropriate resources, in order to improve existing due diligence mechanisms and to learn useful lessons for duplication in other areas of operations. This priority area, focused on 25 countries of sub-Saharan and central Africa, is shown in blue on the map.



Countries of the priority geographical area: Benin, Burkina Faso, Cameroon, Central African Republic, Chad, Congo, Côte d'Ivoire, Democratic Republic of the Congo, Gabon, Ghana, Kenya, Liberia, Malawi, Mali, Mauritania, Niger, Nigeria, Republic of Guinea, Senegal, Sierra Leone, Tanzania, Togo, Uganda, Union of the Comoros, Zambia

2.3 Report on implementation of the duty of care plan

The report on the Bolloré Group's 2020 duty of care plan is divided into several areas:

- infographic on the implementation of the Bolloré Group's duty of care plan;
- focus on structuring the Group's responsible procurement approach;
- illustration of the Group's duty of care cycle approach and proposal of concrete examples for 2020;
- table of duty of care indicators.

2.3.1. INFOGRAPHIC ON THE IMPLEMENTATION OF THE BOLLORÉ GROUP'S DUTY OF CARE PLAN

	2017 to 2019	2020
Risk mapping	<ul style="list-style-type: none"> • Pooling of the duty of care approach with the Group CSR strategy (definition of a duty of care risk universe and rating of CSR risks with the management committees). • Prioritization of the human rights theme (implementation of a steering committee and development of a specific BTL cartography incorporating in-depth geographical criteria) 	<ul style="list-style-type: none"> • Launch of the human rights questionnaire on the Bolloré Transport & Logistics scope to refine the mapping of Group human rights risks (see chapter 2 – 1.2.2. Acting with integrity when conducting our business and promoting human rights in our activities) • Development and configuration of an assessment tool to evaluate the degree of care to be provided for suppliers and subcontractors constituting the supply chain
Actions implemented	<p>Cross-business duty of care actions:</p> <ul style="list-style-type: none"> • Formalization of CSR risk management frameworks within the Group's EFPSs, regularly updated and supplemented by the control workshops organized with the risk-bearing business lines • Development of the duty of care cycle approach. • Formalization of the Group's ethical approach and the whistleblowing system, continued in 2020 • Pilot mission in Republic of Côte d'Ivoire to compare the Group's risk universe with operational reality <p>Environment</p> <ul style="list-style-type: none"> • Group environmental risk management framework (see chapter 2 – 1.2.3 Innovating in response to major environmental challenges) • Establishment of a working group to respond to the CDP and initiate a climate strategy <p>Health and safety of people</p> <ul style="list-style-type: none"> • Group health/security risk management framework (see chapter 2 – 1.2.1. Uniting and protecting the company's greatest strength, its men and women), applicable to both direct employees and employees of subcontracting companies • Development and enhancement of certifications for our activities <p>Ethics and human rights</p> <ul style="list-style-type: none"> • Group social risk management framework • Group human rights risk management framework • Framework for managing societal risks • Formalization of the Group Human Rights Charter and of an action plan • Formalization of the Diversity & Inclusion Charter and diversity action plan deployed by BTL HRD (see chapter 2 – 1.2.2. Acting with integrity when conducting our business and promoting human rights in our activities) 	<p>Actions carried out</p> <p>Continued deployment of the Group human rights action plan</p> <ol style="list-style-type: none"> 1) Improved communication of tools and processes by solidifying the network of contacts and using Group newsletters 2) Formalization of the ethics system and refinement of risk mapping for both direct entities and the supply chain 3) Deployment of an awareness-raising campaign with the development and dissemination of a duty of care and human rights e-learning course for all employees (see chapter 2 – 1.2.2. Acting with integrity when conducting our business and promoting human rights in our activities) <p>Development of the climate strategy</p> <ul style="list-style-type: none"> • First phase of the carbon review in support of expert firms • Defining carbon targets and construction of the climate roadmap (in progress): this approach will be submitted for validation to General Management (see chapter 2 – 1.2.3. Innovating in response to major environmental changes). <p>Publication of the enhanced ethical framework</p> <ul style="list-style-type: none"> • Publication of the Group Ethics & CSR Charter • Publication of the Code of Conduct • Finalization of the roll-out of the whistleblowing system <p>Structuring of a Duty of care purchasing approach</p> <ul style="list-style-type: none"> • Publication of the Responsible Purchasing Charter and of a CSR clause • Raising awareness among the central and local procurement teams to ensure the proper use of tools in each family • Launch of a refined risk mapping approach within the supply chain <p>Update of social, environmental and societal risk management frameworks within the 2020 EFPS</p> <ul style="list-style-type: none"> • Development of Group objectives by CSR risks identified, validated by the Ethics - CSR and Anti-corruption Committee <p>Illustration of the Group's approach through examples of 2020 duty of care cycles</p> <ul style="list-style-type: none"> • Duty of care cycle in response to the health crisis • Duty of care cycle for hazardous material storage and transport procedures • Duty of care cycle for Bolloré Logistics' mining activities

2 Bolloré Group non-financial performance

2. Duty of care plan of the Bolloré Group

2020-2021 OBJECTIVES	<ul style="list-style-type: none"> • Continue to improve the ethics system and develop coherent and shared commitments and tools • Publish an Ethics & CSR Charter and an enhanced Code of Conduct in terms of human rights • Develop aligned initiatives in the field and relevant indicators: <ul style="list-style-type: none"> → Target partially achieved in 2020 and renewed for 2021: duty of care indicators have been identified (see the table of indicators at the end of the plan) and a project to formalize ethical reporting has been launched. However, field actions are limited due to the health context: remote awareness-raising initiatives have been favored this year • Continue campaigns to raise awareness and to train the teams of all the entities in the priority area: <ul style="list-style-type: none"> → Target partially achieved in 2020 and renewed for 2021: the deployment of e-learning is a success, with nearly 50% of employees trained at December 31, 2020, five months after its launch. However, the constraints linked to the health crisis have hampered its deployment in the priority duty of care zone. → The drawing up of a draft Code of Conduct e-learning, dealing with duty of care topics, was launched in 2020 and will be rolled out in 2021. • Deploy a responsible purchasing strategy: <ul style="list-style-type: none"> → Objective achieved for central purchases and currently being rolled out locally.
2021-2022 OBJECTIVES	<ul style="list-style-type: none"> • Improve the opening of the duty of care mechanism to external stakeholders (in progress) • Define an objective long-term trajectory (in progress: short-term objectives have been set for each of the risks) • Develop appropriate and objective action plans based on the results of the BTL human rights risk map
LONG-TERM OBJECTIVES	<ul style="list-style-type: none"> • Deploy a duty of care culture adapted to all business lines, responsibilities and potential risks • Formalize a stakeholder identification and dialog approach
CHALLENGES FOR IMPROVEMENT	<ul style="list-style-type: none"> • Range of extremely different issues depending on the business and geography of implementation • Difference in policies maturity by activity and organizational and operational complexity • Development of monitoring indicators and performance indicators

The duty of care plan report includes the basic elements of its methodology. This infographic aims to represent the continuous improvement of the Bolloré Group's duty of care approach in a concise manner. The policies, action plans and indicators used to measure the performance of CSR risk management,

particularly in terms of protecting the environment, health and safety of persons, and respect for human rights, are explained and developed in the Group's non-financial performance statement, in accordance with the risk pooling approach.

2.3.2. DUTY OF CARE POLICY IN THE SUPPLY CHAIN

The Group launched a first project to identify the social, human and environmental risks and issues associated with its supply chain activities in 2018. This approach, presented in the minutes of the due diligence plans of previous years, has made it possible to draw up an overview of the tools and processes used in the selection phase of service providers, suppliers and subcontractors, according to the Group's different purchasing families. The approach has enabled an initial campaign to raise awareness of the issues surrounding the duty of care among purchasers, and has notably led to the appointment of CSR and ethics contacts in the main purchase families.

Workshops are organized regularly in order to assess the existing situation, optimize the development and proper appropriation of new processes and tools, train and raise the awareness of the teams on the issues of duty of care and the Group's CSR strategy.

In accordance with the Group's commitment, in 2019 and 2020 the CSR Department continued to refine risk mapping within the supply chain in collaboration with the CSR representatives of the procurement teams.

2.3.2.1. STRUCTURING OF THE DUTY OF CARE APPROACH WITHIN THE BOLLORÉ GROUP PURCHASING DEPARTMENT

In accordance with the commitments expressed in the 2019 duty of care plan, the CSR Department organized a project to formalize its "purchasing duty of care" approach, jointly with the Compliance Department and the Group's Legal Departments. This duty of care approach consists of three concrete actions:

the publication of the Group Responsible Purchasing Charter, the development of a CSR clause, and the refinement of the duty of care risk mapping within the supply chain.

PUBLICATION OF A GROUP RESPONSIBLE PURCHASING CHARTER

The work initiated by the Group in 2017 to structure and solidify its duty of care approach within its supply chain resulted in the preparation and publication of the Group Responsible Purchasing Charter. As a result of several years of discussions with the various stakeholders (clients, rating agencies, employees), it forms the basis of the duty of care approach to be rolled out in the supply chain. Signed in July 2020 by the Group Purchasing Director and approved by the Ethics Committee, this charter is part of the Group's ethical framework and defines:

- principles designed to ensure ethical and lasting commercial relations with subcontractors and suppliers of goods and services;

- the Group's various commitments to its business partners. This dual commitment reflects the Group's desire to make every effort to prevent and reduce risks in its value chain through a process of dialog, reciprocity and support with its suppliers and subcontractors. Available on the website, this charter is intended to be transmitted as part of any new contractual relationship.

DRAWING UP A CSR CLAUSE

With a view to favoring business partners that respect its principles, the Group CSR Department has drawn up a CSR clause in collaboration with the Legal Departments, the Purchasing Department and the Group Compliance Department. This clause aims to anchor the importance of the commitments described in the ethical system in the contractualization processes.

While the purpose of these documents is to establish a common foundation, adapted to the Group's business lines, subsidiaries and locations, the Group

Purchasing Department has developed procedures, referral procedures and dedicated tools according to the organization of its different purchasing families. This is why, in order to optimize the smoothest and most efficient implementation of Group commitments, dedicated projects will continue in 2021 with the purchasing teams to ensure that these tools are properly used.

REFINING THE IDENTIFICATION OF RISKS ASSOCIATED WITH THE GROUP'S DIFFERENT PURCHASING FAMILIES

In 2020, the work initiated since 2017, and expanded each year, led to the development of a dedicated methodology. The Group Compliance Department has formalized a policy for assessing the integrity of suppliers and subcontractors describing the process of assessing the specific risk caused by the relationship maintained, or that it is envisaged to maintain, with a given supplier or subcontractor, for the scope of transport and logistics activities initially. With a view to optimizing and aligning with existing methodologies, a specific duty of care risk mapping tool is being developed internally to complete this procedure on CSR aspects. The tool aims to provide a first risk identification based on studies and

evaluation scales developed by international ESG reference bodies (including the Global Slavery Index, or the UN Human Development Index). Based on these rating indexes, the Group has developed a criticality index on social and human rights issues depending on the geographical location or origin of its suppliers and subcontractors, which will enable suppliers to be classified into several categories (low risk, moderate risk, high risk, priority risk). This tool will be rolled out in a pilot project in 2021 within the Infrastructure and Real Estate Purchasing Department.

2.3.2.2. REPORT ON THE DUTY OF CARE APPROACH WITHIN THE GROUP SUPPLY CHAIN

While adhering to Group values and the commitments in its ethical policy is an essential condition for the selection of a partner, the organizational specificities of the various families of Group purchases mean that priority risks must be identified according to the categories and subcategories of purchases, and also territories and the roll-out of appropriate procedures. The Group Purchasing

Department is thus organized around four large families of purchases: general or non-production purchases, purchases relating to freight – specific to freight forwarding activities, building and infrastructure purchases and purchases of items necessary for operating activities.

PURCHASING EXCLUDING PRODUCTION

Scope

This category refers to supplies used for the company's daily operations not including production activities. The Non-Production Purchasing Department manages the entire Bolloré scope, including Vivendi, in a centralized manner from head office.

Sub-categories

IT and telecommunications, business travel, service & facilities, cars and telephony.

Risks

This category refers to several products and services, which may be associated with significant duty of care issues. For example, purchases relating to travel and cars have an environmental impact associated with the issues of greenhouse gas emissions and purchases of services (cleaning, catering or security) may be related to social and human rights issues depending on the geographic area.

Specific duty of care process

Criteria taking CSR and human rights into account are included in the ethics duty of care questionnaire for the Group's suppliers, subcontractors and intermediaries. It is sent prior to the business relationship and consists of

some twenty open-ended and closed questions (e.g. minimum contractual age for employment, how minimum wages and weekly hours of work are set, the existence of an environmental management system, health and safety, criteria for selecting suppliers, etc.). The analysis of the answers also includes a screening using an external tool to identify any CSR-type controversies that may arise with each company. The questionnaire is sent as a priority to suppliers identified as being the most risky according to the mapping chosen.

Actions underway

- Continuation of the awareness raising and training of purchasers on the implications of the duty of care issues in their scope.
- Identification of strategic suppliers to launch a pilot evaluation project: the deployment of the listing of strategic suppliers on the EcoVadis platform was initiated at the end of 2020 and will continue in 2021.
- On the basis of the panel identified, production of a questionnaire by subcategory, prioritizing service & facilities purchases in the area of human rights, as well as priority on travel purchases for the environmental aspects: scheduled for 2021-2022.
- Inclusion of the CSR clause in the general purchasing processes.

Indicator

62% of the general purchasing team's buyers trained on duty of care issues, a target of 100% deployment at the end of 2021.

FREIGHT PURCHASES

Scope

This category relates to the selection of freight solutions and services and therefore specifically concerns the freight forwarding activities of Bolloré Logistics.

Sub-categories

Sea, air and road transport.

Risks

With regard to sea and air freight, the Group deals for the most part with a panel of identified partners, within the framework of comprehensive contracts with several clauses on ethical issues. The Group has also chosen to focus a specific duty of care approach on road transport purchases. Since several African regions have limited infrastructure, road transport purchases have specific issues (more limited choice of suppliers, need to train subcontractor drivers on Group health and safety standards, significant number of partners with extremely varied profiles depending on regions, etc.).

Specific duty of care process

Introduction of a duty of care procedure (including the provisions of the Sapin II law and the duty of care plan) for major suppliers in the sea and air transport

sector (70% of freight capacity purchases, all methods included), requirement of commitment of compliance with documents setting out Group ethical provisions and monthly business reviews which include contractual environmental requirements. A CSR questionnaire has also been developed specifically for the activities of the transport committee, including environmental criteria.

With regard to road transport providers, introduction of an obligatory selflisting system, using a questionnaire with sections on ethics, sustainable development and QHSE, as well as the submission of documentary proof (100% of active truckers were listed at the end of 2018).

Actions underway

- Continuation of awareness-raising and training of freight purchasing teams on duty of care issues.
- Mapping of priority road suppliers, depending on the location, operation and volume of purchases: project put on hold, this approach will be adapted according to the finalization of the configuration of the risk mapping tool developed internally.
- Appointment of a "sustainable supply" contact in relation to purchases of sea freight by Bolloré Logistics.
- Adaptation of duty of care processes to the tools specific to the road transport sector.

2 Bolloré Group non-financial performance

2. Duty of care plan of the Bolloré Group

Indicators

- **Maritime:** in 2020, 92% of partners (in terms of volumes) received the duty of care questionnaire, the Code of Conduct and the CSR Charter.
- **Air:** in 2020, 74% of partners (in terms of volumes) received the duty of care questionnaire, the Code of Conduct and the CSR Charter. The goal for the end of 2021 is to standardize processes to consolidate all the ethical and CSR documents to be included in the contractual relationship,

including the CSR clause, to reach all listed suppliers in the maritime and air sector.

- 45% of the freight purchasing team trained on duty of care issues (scope: Middle Office Global, Middle Office Solution Corporate, Middle Office Sea LCL, Middle Office Air Freight, Middle Office Land Freight, and Strategic Partnerships for Freight Forwarding) with a target of 100% deployment by the end of 2021.

INFRASTRUCTURE AND REAL ESTATE PURCHASES

Scope

This category is managed centrally for the whole Group for large and/or complex projects involving significant amounts (over 300,000 euros). Smaller projects are managed by teams locally.

Risks

While purchases can sometimes make up a very significant volume within the context of new project launches, the share of this purchasing category in relation to the overall amount is not constant. In addition to the environmental impacts associated with construction projects, there must be specific duty of care for certain geographic areas since services linked to works can, in certain areas, present risks in the area of safety, working conditions and accommodation. In particular, construction projects can involve a lot of labor, local or foreign workers working in health, economic, infrastructure or cultural contexts may vary considerably from one territory to another.

workers, the terms of payment for funerals in the event of fatal accidents, the prohibition of forced labor and child labor, non-discrimination and equal opportunities, representation of employees and trade unions, etc. In addition, depending on the issues identified, socio-environmental impact studies are carried out upstream of the projects, enabling a review of related topics (the environment, biodiversity, impact on the local economy, etc.).

Actions underway

- Team awareness and training: organization of a webinar for the first half of 2021 to raise awareness among local representatives (Haiti, Guinea, Senegal, Republic of Côte d'Ivoire, Ghana, Republic of the Congo, Benin, East Timor).
- Systematize environmental and social impact studies prior to construction projects for which this type of study is relevant.
- Develop and refine the identification of duty of care risks by region: works and infrastructure purchasing have been selected as part of a pilot project to deploy the duty of care risk mapping tool developed by the Group.

Specific duty of care process

In addition to appending the traditional Codes of Conduct and QHSE requirements, most major construction contracts (FIDIC-type contracts) in and out of France already include duty of care components. Thus, the subcontracting contracts include requirements on the treatment of personnel relating to: the prevention of AIDS, respecting the rights of foreign workers, measures against insects and pests, prohibition of alcohol, drugs, weapons and ammunition, respect for local religious customs, access to suitable food and water for

Indicators

- 84% of the team trained, a 100%-deployment target at the end of 2021.
- Attachment of the Responsible Purchasing Charter in 57% of contracts in 2020 (100% inclusion in contracts since the publication of the document in July).
- Inclusion of the CSR clause in 13% of contracts in 2020 (100% inclusion in contracts since the clause was validated in September).

INDUSTRIAL PURCHASES

Scope

A central team manages purchases of equipment specific to the Group's industrial activities, for the most part located in Africa (e.g.: lifting equipment, locomotives, etc.), in ports and for the logistics and energy sectors.

Risks

Purchases made centrally are for the most part for Africa, where a large part of operating activities are concentrated. However, given the nature of industrial equipment requirements, with the exception of a few products such as fuel or spare parts, purchases are imported from various continents and therefore have a significant carbon footprint. This family of purchases also includes the production activities of the Group Electricity storage and systems subsidiary. In terms of the safety of users of Blue Solutions products, particularly regarding the use of the LMP® battery, Blue Solutions is the only company to master "all-solid" technology for battery manufacturing, which has the advantage of avoiding the environmental risks associated with the release of hazardous liquids, or the formation of explosive atmospheres in confined environments. Its batteries are exempt from SVHC (Substance of Very High Concern) according to REACH regulations and CMR (carcinogenic, mutagenic or toxic for reproduction) according to CLP regulations, and also contain neither cobalt, nor nickel or any of the minerals targeted by the European regulation.

While the battery production activity generates less than 3% of Group revenue (excluding Communications), in accordance with the commitments formalized in the Group's ethical framework and responsible procurement approach, special care is paid to the supply of lithium. The Brittany division is sourcing from four suppliers, but 90% of the supply comes from one of the market leaders, guaranteeing the traceability of minerals (mostly Australia) whose processing sites are certified ISO 14001, ISO 45001 and ISO 9001. In addition, human and environmental rights criteria are incorporated as part of the IATF 16949 certification and an audit process is planned.

Actions underway

- Training and raising awareness of teams.
- Organization of work meetings to determine the subcategories of industrial purchases and fine-tune the risk mapping.
- Drawing up supplier evaluation questionnaires once a panel has been identified.

It should be noted, however, that implementing measures of reasonable duty of care may be challenging given the circumstances in certain regions. It is not unusual that certain suppliers or service providers have no competitors in the local, regional or even national market, as for example in the case of railway construction or the procurement of oils. The Group's entities may therefore have very restricted influence or latitude in applying CSR criteria to the selection of a supplier.

Specific duty of care process

In the Electricity storage and systems division, Blue Solutions has created a document listing sustainable development requirements for suppliers, notably including specific human rights issues (in particular forced and child labor). In addition, the Bluebus and Batteries companies carried out human rights audits, in 2018 and 2019 respectively, the conclusions of which did not pick up any shortfalls. CSR criteria are incorporated prior to the selection of new suppliers of the Blue Solutions Brittany division, whose purchasing policy includes environmental criteria.

Indicator

–53% of the team trained, a 100%-deployment target at the end of 2021.

2.3.2.3. OBJECTIVES

FIXED OBJECTIVES IN THE 2019 DUTY OF CARE PLAN REPORT

- Develop a Group duty of care purchasing charter setting out the fundamental commitments valid for all purchasing families.
 - Target achieved with the publication of the Responsible Purchasing Charter in July 2020. The document, which was incorporated into the Group's ethical framework, was sent to the purchasing departments initially and then to all employees. It forms the basis of commitments from which specific internal policies will arise to address the challenges associated with the different purchasing families.
- Continue the training and awareness-raising campaign for purchasing teams on CSR and duty of care key issues, in order to optimize deployment, the formal creation of processes and the application of Group commitments.
 - Objective achieved by prioritizing the dissemination of the human rights awareness module to purchasing teams and the continuation of workshops that led to the formalization of the CSR clause and the gradual integration of this tool into existing processes.

2021-2022 TARGETS

- Continue to roll out the human rights awareness module to train 100% of the purchasing teams centrally in 2021 and ultimately with local teams.
- Continue the proper appropriation of the Group's commitments in terms of duty of care in its supply chain by integrating the Responsible Purchasing Charter and the CSR clause into 100% of contractual relations by 2022.
- Finalize the purchasing risk map in order to propose action plans dedicated to the issues identified in the different families, prioritizing categories of suppliers and subcontractors.

2.3.3. DUTY OF CARE CYCLE APPROACH

The duty of care cycle approach (see 2.2. Methodology) explains the methodology used by employees to manage the risks identified. It is used to illustrate the Group's approach through various concrete and relevant examples in terms of cross-business issues (environment, social and human rights, health and safety):

- duty of care cycle in response to the health crisis;
- duty of care cycle of procedures for the storage and transport of hazardous materials;
- mining duty of care cycle.

2.3.3.1. DUTY OF CARE CYCLE IN RESPONSE TO THE HEALTH CRISIS

RISK IDENTIFICATION

Activities: all Bolloré Group employees and business lines.

Countries identified: the entire Group scope of operation.

Risks: the emerging infectious disease was very localized during the first few months of 2020. The SARS-CoV-2 coronavirus epidemic then spread worldwide becoming a pandemic. Specific measures had to be implemented due to the contagiousness and danger of the virus, particularly for people at risk. The first

major issue identified by the Group referred back to its CSR commitment borne by the social aspect of the strategy which is to protect the health and safety of women and men exposed in their activities. The second major issue relates to the continuity of the Group's activities: the Group has been identified as a provider of essential services, particularly in terms of the routing of products and goods considered to be a priority.

RISK HANDLING

Governance: Human Resources Departments, QHSE Departments, General Management and local management, Group crisis unit and crisis units within the various business units.

Tools: the criticality of these challenges involves the collaboration of all, as well as the deployment of tools and processes adapted to the organizational and operational specificities of the Group's various activities.

- General measures:
 - development of contingency plans for the various business units;
 - roll-out of strategies to local management (strengthening of prevention systems by providing adequate staff and equipment facilities, implementation of appropriate measures in countries where a lockdown was required, arrangements for remote working where possible, and on-site work while complying with social distancing and travel restrictions where applicable);
 - awareness-raising sessions dedicated to preventing the spread of the virus and support for employees in adapting their work organization;
 - mobilization with our stakeholders (clients, suppliers, subcontractors) to facilitate the continuity of our activities and increase vigilance on strict compliance with supplier payment deadlines so as not to penalize their cash flow;
 - support of solidarity initiatives around the world to contain the spread of the virus, to help the poorest, or to support the local economy (gift of hand-washing kits to local organizations in Republic of Côte d'Ivoire, provision of free food routing, fundraising, etc.) (see chapter 2 – 1.2.4. Committing to regional development over the long term).

- Bolloré Ports & Railways specificities:

The Group's Transport Commission demonstrated its ability to ensure the continuity of its customers' flows via:

- an increase in the number of health and safety training hours provided to subcontractors;
- dedication of World Day for Safety and Health at Work 2020 to the communication of the health measures prevention plan.

- Bolloré Logistics specificities:

The Group's transport commission has demonstrated its ability to ensure the continuity of its customers' flows with various measures:

- organizational adaptations for the continuity of its mission (rotation of air charters, technical innovation and deployment of new transport operations management tools);
- establishment of strategic stocks of protective equipment and prioritization according to the risks identified in the various territories of operations;
- development of the Covid-19 response plan by Bolloré Logistics' QHSE Corporate Department (possibility of using a psychological assistance service extended to beneficiaries);
- implementation of a task force in summer 2020 to prepare for the adaptation of the service offering for the arrival of vaccines, composed of 6,000 experts in 24 countries.

- Bolloré Energy specificities:

Bolloré Energy's mobilization during this period of health crisis ensured the supply of non-road diesel to agricultural companies that are particularly called upon to meet the food needs of its population (see chapter 2 – 1.2.1. Uniting and protecting the company's greatest strength, its men and women).

- implementation of PEPA bonuses (exceptional purchasing power premium) for the jobs of driver-deliverers and heating service technicians.

2 Bolloré Group non-financial performance

2. Duty of care plan of the Bolloré Group

- Specificities of Electricity storage and systems activities: The entities mobilized their resources in an effort to innovate to protect people's health. A few examples:
 - Blue Systems proposed new applications such as SafeFlow (solution developed by Automatic Systems that provides temperature and mask monitoring integrated with its access control equipment, counting of the maximum number of people who can enter a building);
 - development by EASIER of a temperature measurement device and of Touchless Solution, a software that allows the use of equipment (terminals, transport ticket distributors) without having to touch them;

- the Smart Mobility Platform: a crisis management tool that allows cities to organize their urban space according to travel flows (making it possible to limit access to quarantine areas during epidemics).

Indicators

Bolloré Logistics	<ul style="list-style-type: none"> – 1 billion masks transported between April and July 2020 – 70% of employees working from home at the height of the pandemic
Bolloré Energy	Supply of nearly 18,000 French agricultural companies

2.3.3.2. DUTY OF CARE CYCLE FOR HAZARDOUS MATERIALS STORAGE AND TRANSPORT PROCEDURES

Example of measures taken following the explosion at the port of Beirut

RISK IDENTIFICATION

Activities: Bolloré Transport & Logistics entities operating in the storage and transport of hazardous materials or products.

Risks: although it was not involved in the events, the accident led the Group to increase its duty of care for its own storage and hazardous products transport activities.

RISK HANDLING

Governance: Bolloré Transport & Logistics QHSE departments.

Tools: in 2020 a study of hazardous containers and products was carried out on Bolloré Transport & Logistics entities leading to a review of dedicated operational procedures and the implementation of a detailed action plan by activity. In particular, this update took into account local references (the operating regulations of port and rail authorities) and the international references modified in 2020 due to the management of hazardous materials, in particular:

- the International Maritime Dangerous Goods (IMDG) Code, which governs the handling and storage of dangerous containers within port terminals;
- the Agreement concerning the International Carriage of Dangerous Goods by Road (ADR) for road transport;
- the International Carriage of Dangerous Goods by Rail (RID) Regulations for rail transport.

Internal operational procedures – SOPs (Standard Operating Procedures) – have strengthened this documentation in light of changes in regulations and are also used for the training of operational staff.

Objectives: in 2021, Bolloré Ports plans to increase the awareness of its partners on the difficulties and specificities of hazardous container handling and storage, particularly hoist removals or receptions, both in terms of planning and in terms of impact on ship productivity. Hazardous containers management must follow a specific process clearly defined by the Group and communicated to third parties.

2.3.3.3. DUTY OF CARE CYCLE OF BOLLORÉ LOGISTICS' MINING ACTIVITIES

The Bolloré Group does not carry out mining activities. Nevertheless, in line with its commitments, as part of its transport and logistics activities, the Group is showing the utmost duty of care in selecting its business partners and customers in the transport of minerals.

RISK IDENTIFICATION

Activity: among the various categories of transport services offered by the Bolloré Logistics subsidiary, transport activities serving customers operating in the mining industry are particularly indicative of the Group's duty of care cycle approach. These activities are carried out in the zone defined as a priority within the meaning of the duty of care plan and, by their nature, contain multiple risks. This activity is included in the Oil & Gas Mining and Chemical sector, which accounts for about 18% of Bolloré Logistics' activities.

Countries identified: in line with the prioritization methodology set out in the duty of care plan, the countries located within the duty of care geographical area were identified as priorities (Democratic Republic of the Congo, Zambia,

Rwanda, Burundi, Tanzania, Senegal, Burkina Faso, Mali, Republic of Côte d'Ivoire, and Mauritania).

Risks: Bolloré Logistics does not carry out any ore mining activities but is required to carry out transport services for customers operating in this sector. However, there are many known issues in the mining industry: risks of direct or indirect contribution to conflicts, and serious human rights violations associated with the extraction, trade, processing and export of resources; tolerating, benefiting, contributing, or assisting with forced labor or child labor; illegal exploitation of land, relocations, environmental pollution and damage to the health of local populations.

RISK HANDLING

Governance: the environmental, social and societal risks associated with ore transport and logistics activities have been identified for many years, are regularly updated, and are mainly addressed by the QHSE Departments, which rely on various tools and processes.

Tools: Bolloré Logistics' general charters and policies governing activities in Africa, including mining product transport activities, cover all of the issues identified:

- charters of the Group's ethics system: Ethics & CSR Charter, including the Human Rights Charter, the Diversity and Inclusion Charter, and the Responsible Purchasing Charter;
- QHSE procedures: general rules of conduct Africa, quality policies, preventive policies on drugs and alcohol, health, HSE and safety, listing and monitoring of carriers within the internal database, Bolloré Logistics "B'Excellent" corporate steering platform dedicated to Quality, Health, Safety and Environment activities;
- the Transport Charter: quality charter to be signed by subcontractors at the same time as the contract, notably recalling the necessary compliance with the Group's requirements regarding the prohibition on the direct or indirect use of child labor, and compliance with the Group Code of Conduct;
- policy on conflict minerals.

The integrated QHSE management system includes several procedures, adapted to the African territory. A statement of certifications by country is monitored, with global certification management. The Africa region obtained multi-site certification in 2019, including the Group's entities operating in Africa and already certified. In 2020, a new step was reached with the achievement of a global certification, which now covers Africa and the Group's other regions. This certification ensures the harmonization of practices within the Group and better control of transactions carried out by local entities.

Participation in the ITSCI program, relating to the responsible supply chain of minerals and their traceability in the Great Lakes region.

Certifications and standards monitored by the division

ISO 9001	Quality management
ICMC	Cyanide transport and storage
OHSAS 18001	Occupational health and safety management
SQAS	Quality, safety and environment systems related to the transport of dangerous goods
ISO 22000	Food safety
ISO 14001	Environmental management
TAPA FSR C	Warehouse security
GDP/GSP	WHO Framework on the distribution and storage of pharmaceutical products (obtained in 2020)

General framework for managing risks

The Bolloré Group's divisions implement risk mitigation procedures that take into account all their stakeholders: employees, subcontractors and service providers carrying out assignments on the Group's facilities, as well as nearby communities. Mandatory training for each of the following dimensions is detailed in a Bolloré Logistics standard. In the context of transport and logistics activities specific to the mining industry, the management of the associated risks is based in particular on two aspects identified as a priority:

- strict supervision of subcontracting;
- hazardous product management.

• Supervision of subcontracting

The management of subcontractors and third parties is subject to a specific framework including:

- an annual selection and evaluation procedure;
- an appendix to all non-transport subcontracting contracts listing the minimum expected commitments from subcontractors (minimum QHSE requirements);

- an appendix to all transport subcontracting contracts listing the minimum expected commitments from subcontractors (subcontracted road transport requirements);
- the integration of the Transport Charter, recalling the required and expected supporting documents from service providers, and indicating mandatory training to be followed (specific Bolloré Logistics procedures, upgrade, etc.);
- the integration of the CSR clause: a system currently being rolled out in the various purchasing departments, which must be integrated into all contractualization processes by 2022;
- a subcontractors management procedure, defining the controls carried out by Bolloré Logistics (HSE management of subcontractors);
- as part of the ISO 9001 certification, for each certified entity, an identity form has been put in place for each process. One element of this sheet is the identification of interested parties and their expectations. This form was identified in 2018 as a possible support for strengthening duty of care/CSR processes.

• Hazardous product management

With regard to the management of hazardous products, a specific procedure details how dangerous goods are managed, stored and transported. The rare cases of accidental situations having an impact on the environment are also covered by specific formal procedures: accidental spills and fire prevention/protection, for example. The transport of cyanide is the subject of special plans. A crisis management response: Bolloré Logistics has a Crisis Management Process, explaining the organization to be put in place in a crisis situation and describing the procedures and tools to coordinate communication both within the company and with external stakeholders (media, local authorities and other third parties). This document identifies several categories of risks according to different events (natural disasters, human rights violations, installation failure, industrial accidents, political or health crises, etc.) and proposes a methodology for responding. This procedure is supplemented by a business continuity plan, by country, to enable a return to normal as soon as possible in the event of an emergency situation.

• Specific due diligence depending on the steps

Specific vigilance is ensured at each stage of the activity, taking into account the challenges associated with the import and export phases of mining activities, respectively:

- construction phases (import);
- the transport phases of raw materials (exports) such as copper, mining equipment and extractive chemicals such as cyanide.

Import phase

Preparation of the ore export phase

- In accordance with its commitments, the Group considers that its responsibility begins when a project is considered. The process of implementing procedures for exporting minerals takes place several years before the operation phase, governed by a strict qualitative approach, based on specific criteria and a screening and profiling methodology of the companies concerned.
- When a project does not meet Bolloré Logistics criteria, it is decided to adapt Bolloré Logistics' participation in the import phase and the export phase.

Export phase

Identification of risks

Three types of minerals are subject to increased vigilance: tantalum, tin and tungsten, grouped under the name of "3T ores". These minerals are essential for the manufacturing of many electronic products and are likely to pass through the hands of many intermediaries, including via fraudulent methods. The Group, as a forwarding agent, can be part of the supply chain for such ores and accordingly deploys all its tools to ensure due diligence in order to prevent risks. Road surveys are systematically carried out upstream of a project to identify the routes to be used, the risk areas, the parking areas, bridges and existing villages to be crossed. This helps to identify potential difficulties specific to each journey. A report is then produced to list all the points identified during this analysis and to attach risk management actions in order to optimize security. In particular, it identifies, with photos, school establishments on the itinerary, potholes and speed bumps, markets, electrical lines, and any other significant items, and specifies the behavior to adopt in relation to them. Projects have already been refused because they involved too many risks (many villages, non-practicable roads).

2 Bolloré Group non-financial performance

2. Duty of care plan of the Bolloré Group

Organization of the export of minerals

In order to guarantee and implement the best health, safety and human rights standards expected within its logistics activity, the Group only works with partners who are members of ITSCI, a traceability program in line with OECD recommendations on responsible mineral supply chains, seeking to avoid conflict financing, human rights violations or other risks such as corruption in mineral supply chains, in order to address the problem of conflict minerals, particularly in the Great Lakes region.

Delegating due diligence vis-à-vis customers or calls for tenders from the mining sector

The ITSCI program also assists companies in establishing due diligence through risk assessments and independent audits, and establishes and communicates on a monthly basis a list of organizations (mines, exporters) with inconsistent information. As a precautionary principle, the Group excludes any cooperation with these bodies. Carriers are subject to specific internal management and Group procedures. This due diligence is systematically carried out for new entrants, coupled with a field audit.

Mitigation measures for safety, security and environmental risks

As part of its logistics activities, the transport of chemical inputs involves the management and storage of hazardous materials and products. Bolloré Logistics' integrated QHSE management system reduces the environmental impact of its activities and ensures the highest standards of health and safety.

In this context, cyanide is subject to specific measures and strict supervision, particularly through ICMC (International Cyanide Management Code) certification, which imposes numerous requirements to control processes and supplement national and international regulations. In 2020, five Group entities (BTL Burkina, BTL Côte d'Ivoire, BTL Ghana, BTL Senegal and Sogeco Mauritanie) had ICMC certification for cyanide transport. BTL Ghana (the only Group entity to carry out this type of operation) has also obtained certification for its cyanide storage operations. Renewal audits take place every three years. The last audits were carried out in 2019. Specific training is provided for drivers. Each departure of a convoy is subject to an inspection of all trucks. Vehicles undergo preventive maintenance at least once a year, and a maintenance plan is required from Bolloré Logistics subcontractors. All parties involved in the transport of cyanide are required to attend the training.

Consultation and dialog with stakeholders

Consultation sessions with the populations of municipalities crossed by convoys transporting the most sensitive products are organized through these road surveys. Discussions are formalized by the signature of an attendance sheet and representatives are appointed in each country in order to maintain a dialog. With a view to continuous improvement, ITSCI members, of which the Bolloré Group is itself a member, meet annually at OECD premises, as part of conferences and exchanges of best practices for managing the risks associated with 3T ores.

Mining duty of care cycle indicators

	2020	2019	2018
Number of accidents related to the transport of hydrogen cyanide	0	0	1
Number of accidental spills	0	3	0
Number of violations found in ICMC Code third-party inspections	NA	0	0

NA : no applicable.

TABLE OF DUTY OF CARE INDICATORS

The data presented in the table is intended to illustrate the performance of the Group's reasonable due diligence approach in the identified priority geographical area (see 2.2 Methodology) and is used to guide the choices of action plans to be implemented. This "priority duty of care area" covers 48.18% of the Group's workforce (excluding Communications)*.

	2020	2019
Health and safety issues		
Proportion of employees eligible for social security coverage ⁽¹⁾	99.9%	97%
Proportion of entities where health coverage extends to employees' beneficiaries	91%	91%
Proportion of entities where the health coverage is more favorable than required by law	86%	92%
Proportion of employees eligible for regular medical check-ups provided by the company ⁽²⁾	97%	92%
Proportion of entities where medical service is offered to employees free of charge	82%	78%
Severity rate of workplace accidents for employees (x1,000)	0.15	0.11
Frequency of workplace accidents for employees (x1,000,000)	5.19	5.37
Hours of HSE training for employees	127,134	132,072
Hours of HSE training for employees of subcontractors	127,935	94,930
Environmental issues		
Proportion of entities having an environmental policy	78%	80%
Proportion of entities having put in place environmental prevention measures ⁽³⁾	95%	53%
Proportion of entities having environmental protection action plans without performing an environmental risk mapping or analysis	50%	50%
Human rights issues		
Number of collective agreements signed	52	63
Proportion of entities where employees are entitled to have union representation and/or staff representation	96%	97%
Proportion of women having taken at least one training course ⁽⁴⁾	34%	53%
Proportion of entities having conducted awareness and/or facilitation sessions promoting job inclusion, diversity or non-discrimination	21%	26%
Proportion of managers hired locally	92%	88%
Proportion of students hired from a partner school or university ⁽⁵⁾	65%	34%
Proportion of employees having received at least one training course	28%	55%
Percentage of fixed-term contracts converted into permanent contracts compared to the Group	54%	59%

(1) For 42.11% of the entities, there is no legal obligation.

(2) Includes any employee who has access to a medical check-up through the company, even if not made use of during the year. The entities within this scope correspond to 81.94% of Group entities offering free medical follow-up for employees.

(3) Out of the entities that did a risk mapping, i.e. 47%.

(4) As compared to the female workforce in the duty of care scope.

(5) I.e., 75.69% of employees hired at the end of their internship or work-study program within the Bolloré Group in 2020. Students in internships within the entities in the duty of care priority area account for 59.64% of students on internships within the Bolloré Group.

* Scope corresponding to the duty of care priority area, comprising 25 countries (Benin, Burkina Faso, Cameroon, Central African Republic, Chad, Republic of Côte d'Ivoire, Democratic Republic of the Congo, Gabon, Ghana, Kenya, Liberia, Malawi, Mali, Mauritania, Niger, Nigeria, Republic of Guinea, Senegal, Sierra Leone, Tanzania, Togo, Uganda, Union of the Comoros and Zambia).