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# Sustainability report

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## 1. General principles (ESRS 1 and ESRS 2 cross-cutting standards)

**Note on first-time application:** as part of a proactive approach to transparency and continuous improvement, the Bolloré Group has defined a roadmap for the publication of information required under the Corporate Sustainability Reporting Directive (hereinafter the "CSRD").

Unless otherwise stated, the voluntary information identified in the ESRS by phrase "the company may" and the data defined as "phased-in" have not been published as part of this first CSRD compliance exercise. The Bolloré Group also provides additional data such as "entity-specific" information, which is not directly covered by the ESRS, but which reflects the Group's specific sustainability or social engagement commitments or initiatives. In general terms, environmental, social and governance indicators may be subject to methodological limitations due to the lack of harmonization between national and international definitions and laws and/or the qualitative nature of certain data.

On December 9, 2024, more than 97.5% of the shareholders at Vivendi's Combined General Meeting voted in favor of the proposed partial demerger of Canal+ and Louis Hachette Group and the distribution of Havas NV. These transactions took place on December 13, 2024, and the listing of Canal+ on the London Stock Exchange, Louis Hachette Group on Euronext Growth and Havas NV on Euronext Amsterdam began on December 16, 2024.

Following this transaction, Bolloré Group directly holds 30.4% of Canal+, 30.4% of Louis Hachette Group, 30.4% of Havas NV, and retains 29.3% of Vivendi.

The occurrence of this event led the Bolloré Group to reassess its involvement and its relations with Vivendi, as well as with Canal+, Louis Hachette Group and Havas NV. Examination of the existing facts and circumstances on the date of completion of the demerger and subsequently led to the conclusion that the Bolloré Group only exercises significant influence over Canal+, Louis Hachette Group and Havas NV, and loses control of Vivendi within the meaning of IFRS 10.

As of December 14, 2024, these four companies have been accounted for using the equity method in the operating category in Bolloré's financial statements.

Under the ESRS, the scope of the sustainability report is identical to the company's financial reporting scope at the end of the fiscal year. In order to best reflect the reality of the Bolloré Group's activities as of December 31, 2024, the double-materiality assessment has been carried out on the scope of the new Group, i.e. excluding the Communications activities of the Vivendi group, the demerger of which completed in December 2024. As a result, at December 31, 2024, the Bolloré Group comprised Blue Solutions, Bolloré Energy, Innovative Thin Films, IER and Automatic Systems, all of which are wholly owned and consolidated by Bolloré, together with certain non-consolidated minority interests in entertainment, media and agribusiness groups.

Quantitative data points are also provided for the entities within the new Group, diverging in this respect from the ESRS rules, which require certain quantitative data points to be provided for the entire reporting period. However, the Group considered that this was the most appropriate and meaningful means of reflecting the true position of the Bolloré Group's

activities at December 31, 2024. Accordingly, for the preparation of its first sustainability report at December 31, 2024, the Bolloré Group has adopted the following approach:

- the double-materiality assessment was carried out on the Bolloré Group's own operations and value chain at December 31, 2024, subsequent to the demerger of Vivendi. This assessment factored in the potential existence of risks or potential material impacts that could arise in the future from companies over which the Bolloré Group has lost control, but for which it could be held liable as a result of the control it previously exerted;
- the metrics and other information provided on material impacts, risks and opportunities, resulting from the double-materiality assessment referred to above, cover the companies in the Group at December 31, 2024.

The processing carried out by the Bolloré Group in preparing the sustainability report at December 31, 2024 took the following into account:

- under the ESRS standards, the scope of the sustainability report must be the same as the scope used for the financial statements. These standards do not include any specific provisions or guidance on how to deal with disposals that occur during a fiscal year. This is a topic that is the subject of discussion, and has been brought to Efrag's attention via the Q&A platform<sup>(1)</sup>. Efrag had not provided any explanations at the date of publication of this report;
- the sustainability report was prepared in the very specific context of the first-time application of the ESRS. In particular, the Group has applied the transitional provisions set out in the standards, which allow it not to produce comparative data. In preparing this information, the Group has given priority to providing relevant information that enables the reader to understand the sustainability challenges faced by the Bolloré Group's activities as they exist at the end of the fiscal year, together with their associated metrics, and thereby offer a basis for comparison for future fiscal years;
- sustainability information on divested businesses is available from some of the divested companies. During the fiscal year, the Group applied its ESG policies to companies that it sold, up until the date of sale.

The dual context of the demerger and the first-time application of the ESRS in 2024 (including the absence of comparative data), coupled with Efrag's failure to take a position on how disposals should be dealt with, led the Group to exclude quantitative data for companies over which it no longer had control from the calculation of metrics relating to the period as a whole. In view of the qualitative characteristics of the information required under the ESRS, the Group concluded that these exclusions had no impact on either the predictive or confirmatory value of the information provided for the Group, and that, on the contrary, they established an appropriate comparable basis for subsequent years.

Finally, to the best of the Group's knowledge, no major events occurred during the 2024 fiscal year that are attributable to the potential risks and impacts of business activities over which the Group has ceased to have control.

### 1.1. Introduction: CSR approach at the heart of our strategy

2024 was a milestone year for the Bolloré Group, both in regulatory and strategic terms. Following the implementation of the Corporate Sustainability Reporting Directive (hereafter "CSRD"), the holding company's support and operational functions devoted a significant proportion of their time to ensuring that the new European transparency and extra-financial performance rules were properly applied. This directive, which imposes increased obligations in terms of environmental, social and governance (hereafter "ESG") reporting, reflects the growing expectations of stakeholders for a more responsible economy, and the Group must meet these expectations with rigor and ambition.

First, in 2024, the priority was to align the company with these requirements. This involved introducing new processes, consolidating data and defining more precise ESG metrics. This report thus reflects the Group's first steps towards achieving even greater accountability in all its activities.

However, this effort took place against a specific backdrop, marked by changes to the Bolloré Group's scope of consolidation, in particular with the disposal of the Transport and logistics businesses in May 2024 and the demerger of the Vivendi group in December 2024. The accounting consequences of the restructuring of the Vivendi group, which was accounted for using the equity method, consequently exclude the scope of the Communications business from Bolloré's sustainability report. This reorganization gave rise to specific challenges, not only in terms of operational management, but also with regard to the Group's strategic vision for sustainability issues. By incorporating these changes, the CSR Department has ensured that the CSRD compliance approach remains consistent with the Group's economic situation and structure. This transition allowed the Group to reassess its priorities, strengthen its commitment to ESG issues, and reconsider its CSR strategy over the long term.

(1) See question ID 166 asked via Efrag's Q&A platform.

As a company with diverse activities, the Group is fully aware of its responsibility in the sustainable transformation of the industries in which it is involved. The Group's commitments in respect of the future are based on three fundamental ESG pillars, which are described in the following pages. The Group's Executive management team sets targets and pays particular attention to optimizing its supply chains and to technological innovations with a view to reducing its environmental impact. In terms of the social pillar, its commitment to good working conditions, equality and diversity remains

at the heart of its actions, while efforts will continue to establish a culture of integrity and transparency at all levels of governance.

In conclusion, this first sustainability report reflects the Bolloré Group's determination to act sustainably and responsibly. The CSR Department measures the progress made and also the scale of the challenges that lie ahead. Through their commitment to CSR issues, all our teams believe that, at their own level, they are contributing to a fairer, more sustainable future, while ensuring the long-term future of their company in a changing world.

## 1.2. Values and commitments based on three strategic pillars reflecting the Bolloré Group's main CSR topics

Since its creation, the Bolloré Group has been driven by a very determined commitment to entrepreneurship and innovation. With a strategy of diversifying its activities, it is listed on the stock exchange and benefits from a stable and family-owned shareholder base, which allows it to make long-term investments. It has a long history of transmission from generation to generation, based on a corporate culture and strong values, shared by all its employees, which include humility, excellence, courage, solidarity, agility and innovation.

The Group is committed to following the principles of respect for human rights and has been a member of the United Nations Global Compact for more than twenty years. This commitment is reflected in the Bolloré Group Ethics and CSR Charter backed by international standards such as the OECD guidelines for multinational companies, the fundamental conventions of the International Labour Organization (ILO) and the United Nations Guiding Principles on Business and Human Rights. All employees of the Group and its subsidiaries are bound by the commitments expressed in this Charter.

The Bolloré Group's CSR strategy described below was first and foremost built on a materiality assessment carried out back in 2016 and updated in line with changes in the Group's scope and the challenges faced by it. In 2024, as part of its obligations under the CSRD, the Group carried out a double-materiality assessment (DMA) to define the most material challenges consolidated at Group level. To that end, each of the Group's businesses was the subject of its own DMA, before being consolidated:

- Bolloré Energy – (Oil logistics sector);
- Blue and Bolloré Innovative Thin Films (ITF) – (Industry sector)<sup>(1)</sup>;
- Systems – (Industry sector).

The Group's DMA identifies priority issues based on the most material impacts, risks and opportunities (IROs), which are then sorted by the CSR Department into the three fundamental ESG pillars (detailed below) that shape the Bolloré Group's CSR strategy. These commitments are upheld by all of the Group's divisions to make CSR part of everyday life in their core business and to create value and connections between the men and women in the company, their environment, and stakeholders.

The Bolloré Group's desire to fulfill its stakeholders' expectations and to play an active role in responsible development is currently reflected in three Environment, Social and Governance strategic priorities:

- an Environment pillar that seeks to adapt our activities to climate change by innovating in products and services and shrinking our carbon footprint;
- a Social pillar that promotes the development of our employees by fostering inclusion and guaranteeing the health and safety of workers throughout our value chain;
- a Governance pillar, to act with integrity in carrying on our business, while respecting the ethical principles shared by all our employees and stakeholders.

The body of this sustainability report explains the measures implemented by the Bolloré Group and each of its entities to mitigate negative impacts, control risks and develop CSR opportunities identified as being material. In line with the financial reporting scope, fully consolidated entities are covered by this report and are classified by business sector: Oil logistics and Industry.

## 1.3. Presentation of the Bolloré Group: governance and strategy

### 1.3.1. GROUP PROFILE (DR: SBM-1 STRATEGY, BUSINESS MODEL AND VALUE CHAIN)

Information on the Bolloré Group's activities, how its revenue is distributed across business sectors, its business model and value chain, and the extent to which sustainability issues are incorporated into the company's strategy, are described in this universal registration document, chapter 1 – Overview of the Group and its activities.

### 1.3.2. GOVERNANCE AND CONTROL BODIES (GOV-1, GOV-2, GOV-3)

Information on the composition of its administrative and management bodies is set out in chapter 4 of the universal registration document (URD).

#### 1.3.2.1. PRESENTATION OF THE BOLLORÉ GROUP'S CSR GOVERNANCE SYSTEM (DR: GOV-1)

In terms of corporate governance, the Bolloré Group refers to the French Corporate Governance Code for listed companies established by the AfeP and the Medef. In addition to information on the composition of its administrative and management bodies, some information on CSR governance is set out below:

At its meeting in March 2023, the **Board of Directors** was invited to consider the changes made in the new version of the Code published in December 2022 aimed at ensuring that the Board of Directors integrates the CSR strategy in its duties. With regard to the creation of a dedicated CSR Committee, the Board members decided that the Board of Directors would continue to refer to the work of the Audit Committee, whose responsibilities

were extended to all CSR issues in 2023. Responsibility for CSR topics has since passed to the Audit Committee and, as such, the independent directors receive regular training on ESG issues, and in particular climate change-related issues, from a third-party organization several times a year. The Board of Directors relies, in areas within their competence, on the work of the Compensation and Appointments Committee and the Audit Committee. The work of the Committees is presented at the Board of Directors' meetings. The members of the Committees and the Chairman of each Committee are appointed by the Board of Directors for the duration of their term of office as directors. This is also the case for the Board of Directors of Compagnie de l'Odét.

(1) With a view to optimization, a joint double-materiality assessment was carried out for these two businesses, as their production sites are on the same land.

**The Group CSR Department**, which reports directly to the Finance Department in direct connection with the Chairman, defines the guidelines for CSR policies in coordination with the various Departments involved (Compliance, Human Resources, Legal Affairs, Purchasing, etc.). It defines the framework of the CSR strategy, plays a role in awareness-raising and mobilization, coordinates action plans, steers annual reporting, and analyzes and enhances extra-financial performance. The CSR Department reports to the Finance Department on a weekly basis, in order to take the decisions needed to define the Group's position on key issues, seize opportunities and ensure implementation of the measures needed to control the Group's CSR impacts and risks. The CSR Department relies on a network of CSR/HSE (health, safety and environment) and HR (human resources) officers at each of its legal entities to produce the double-materiality assessment at divisional level and a consolidated assessment at Group level, define action plans and carry out annual reporting.

Through her participation in the Group's various governance bodies described below, the Head of CSR presents the CSR strategic orientations and the results achieved including with the Audit Committee of Compagnie de l'Odé.

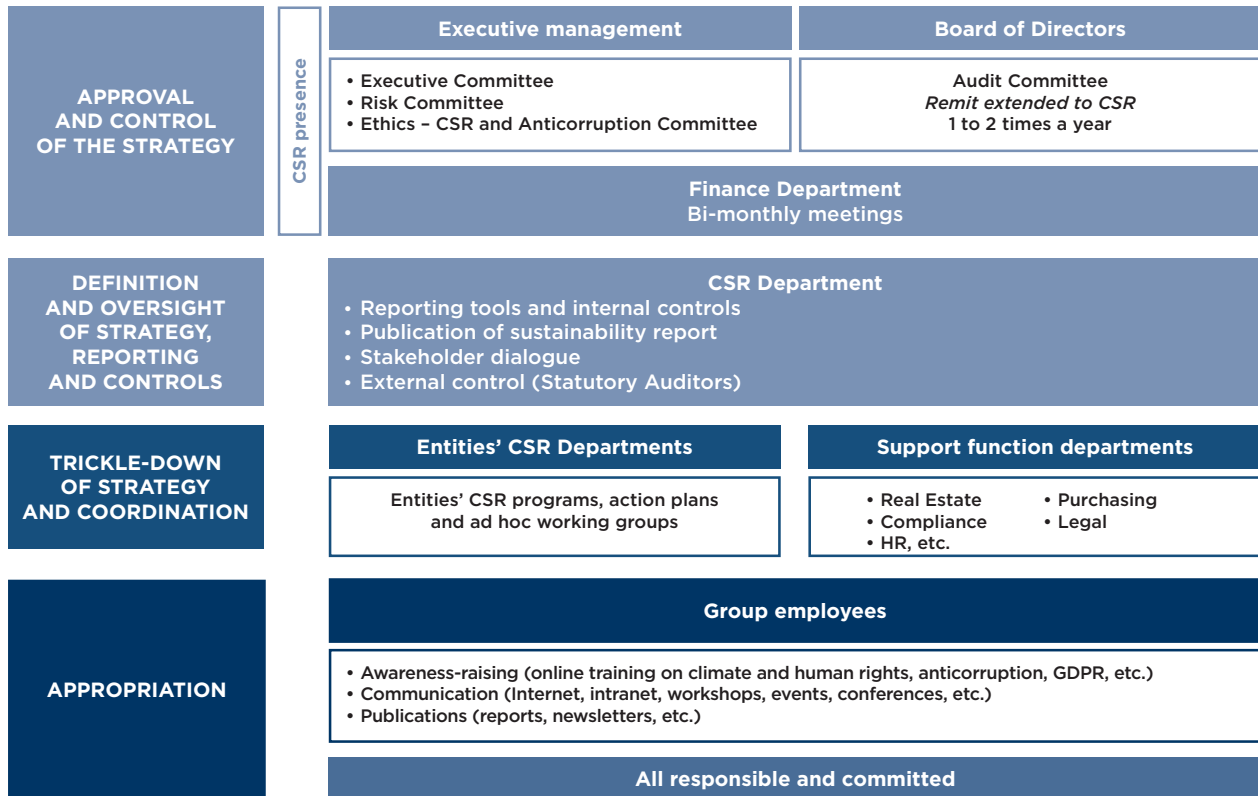
**The Audit Committee.** The Audit Committee is composed of three independent directors. The CSR Department organizes awareness-raising sessions on CSR issues for independent directors. The sessions, which emphasized climate-related issues, were led by external subject matter experts. Strategic directions are presented at every meeting of the Audit Committee of the Bolloré Group and of Compagnie de l'Odé, the holding company. Accordingly, the Chairmen of the Audit Committees determine whether they have the appropriate skills and expertise, whether such skills and expertise need to be developed to oversee all sustainability issues, and they present their respective conclusions and submit the strategy to the Boards of Directors for their approval. In March 2025, the CSR Department presented the results of its double-materiality assessment, which had previously been approved by the Ethics – CSR and Anticorruption Committee. Out of the 315 IROs analyzed, the Audit Committee examined the 17 material challenges for the Bolloré Group associated with 112 IROs on which the Group reports its policies, action plans, indicators and objectives in compliance with the corresponding ESRS. The Audit Committee oversees the reliability, consistency and compliance of extra-financial reporting, by ensuring in particular that the ESG information published in the universal registration document complies with European requirements and is independently verified by the Statutory Auditors. The Audit Committee prepares, analyzes and formulates an opinion which it submits to the Board of Directors for approval.

**The Executive Committee.** Since 2020, Bolloré SE has had an Executive Committee responsible for monitoring the objectives and implementing decisions taken within the framework of the strategic guidelines defined by the Board of Directors. This Committee, which has fourteen members of which 50% men and 50% women, reflects the Group's commitment to gender equality. This Committee is the forum at which the CSR Department presents all the ESG actions that are to be carried out and validates their implementation.

The primary task of the **Ethics – CSR and Anticorruption Committee** is to ensure the compliance and results of the actions taken in terms of the promotion and respect of the Group's values and commitments, and in particular the strict application of the ethical principles published in the Ethics and CSR Charter and the Code of Conduct. Under the authority of the Chairman of the Ethics – CSR and Anticorruption Committee appointed by the Chairman of the Bolloré Group, this body meets twice a year. Its members are the Group's Chairman and Chief Executive Officer, the Deputy Chief Executive Officer, the Heads of the Group's support functions (Finance, Legal, Human Resources, Compliance, Purchasing, Investor Relations, CSR and Sponsorship) and the Executive managers of the Group's subsidiaries. This Committee hears a full report from the Chief Compliance Officer and the Head of CSR. The Committee verifies that the strategy has been properly implemented, reviews performance and determines the prospects, projects and action plans with regard to the Group's priority impacts, risks and opportunities. The double-materiality assessment and the priority IROs were approved at the last Committee meeting held in March 2025.

**The Risk Committee** is chaired by the Chief Financial Officer, who is also Vice-Chairman of the Group, and who includes the assessment of social and environmental impacts and risks on its agenda. The CSR strategy is presented by the Head of CSR using a risk-based approach, including a description of how these risks are controlled. This Committee meets twice a year.

**Steering Committee and CSR network.** The Group CSR Department relies on a network of CSR officers at its subsidiaries to implement the Group's CSR strategy within its business lines. Informal discussions take place on a daily basis, and more formally at monthly meetings of the Steering Committee, attended by all stakeholders, to ensure that the Group's policies are being properly implemented by each entity, and to feed back information useful to the Group as a whole. The heads of CSR at subsidiaries work closely with their Management Committees and business line experts (HSE, HR, purchasing, sales and marketing departments, etc.), and rely on local CSR contributors in implementing policies and reporting the extra-financial information required for annual reports. The internal CSR network has around 62 contributors at 40 entities across Europe, the United States and Canada. In 2024, all the members of the Steering Committee were involved in carrying out the double-materiality assessment and in setting objectives for each material issue.

**Cross-functional CSR governance**

### 1.3.2.2. SUMMARY OF THE INFORMATION DISCLOSURE PROCESS AND HOW THE BOLLORÉ GROUP'S GOVERNANCE BODIES TAKE ACCOUNT OF SUSTAINABILITY ISSUES (DR: GOV-2)

The governance bodies are provided with information at least twice a year via meetings of the Ethics – CSR and Anticorruption Committee and Risk Committee. If a priority need is identified, these governance bodies are also informed via regular reports and specific presentations. These reports include sustainability policies, actions taken, results achieved and performance indicators linked to ESG criteria. The information comes from internal systems used to monitor sustainability indicators, centralized within the CSR Department. The Ethics – CSR and Anticorruption Committee and the Audit Committee, which each meets twice a year, are responsible for managing sustainability issues. The Audit Committee, as stated above, includes three members of the Board of Directors, representatives of the Executive management team and the CSR Department participate in these Committees. In the event of a crisis or major change in regulations, specific meetings may be called in order to adjust the sustainability strategy. At the same time, the CSR Department provides regular reports to the Finance Department and the Executive management team at meetings of the various Committees on the progress of sustainability policies, the associated risks, and performance in terms of indicators. In terms of communication, the Bolloré Group publishes an annual report that covers both financial and non-financial data, enabling stakeholders to track the progress made on ESG objectives. The sustainability report is verified internally by the CSR Department. The Internal Audit Department will see its role in terms of sustainability strengthened gradually through initially

conducting audits related to the Sapin II law. Its role will be strengthened from 2025 onwards with regard to assessing the effectiveness of the CSR policies implemented.

The IROs (i.e. those that have a material impact on the company and its stakeholders) are identified through materiality assessments. These assessments help the governance bodies to understand the issues that are priorities in terms of strategic decisions. Material issues, in particular risks and opportunities associated with climate change, energy transition and human rights, are taken into account at the time the company's strategic directions are defined. This may influence decisions in relation to investments, partnerships and the supply chain. In 2024, in accordance with its obligations under the CSRD, the Group carried out a double-materiality assessment, the results of which were presented to the various approval committees. Together, these governance bodies ensure that strategic decisions are aligned with the company's sustainable development objectives and the expectations of stakeholders (investors, customers, regulators, etc.), taking into account their long-term ESG impacts. These governance bodies are regularly given information about sustainability issues through specialized committees and formal reports, via clear and systematic reporting processes. They factor material issues into their strategic decisions to ensure the company's long-term viability, while meeting societal expectations.

### 1.3.2.3. TARGETS AND VARIABLE COMPENSATION ALIGNED WITH ESG OBJECTIVES (DR: GOV-3)

In line with the Bolloré Group's CSR commitments, the performance share plans incorporate extra-financial criteria defined in keeping with the company's strategy in addition to the achievement of financial objectives. Three criteria will account for 40% in determining the number of shares that may be vested. The three criteria are:

- policy on gender equality within the Executive Committee;
- roll-out of the anticorruption training system;

- roll-out of environmental and climate training.

Comprehensive information on variable compensation, the incorporation of sustainability targets and impacts into compensation criteria, and the main features of the incentive schemes are set out in this universal registration document, chapter 4 – Corporate governance, section 2. Compensation and benefits, part 2.1. Presentation of the compensation policy for corporate officers for the 2024 fiscal year.

## 1.3.3. STATEMENT ON REASONABLE DUTY OF CARE (GOV-4)

Key elements of reasonable care	Bolloré Group
<b>a) Integrate reasonable duty of care into governance, strategy and business model</b>	<p>At the highest level, the Group's senior management promotes a culture based on integrity, transparency and compliance. Through biannual meetings of the Ethics – CSR and Anticorruption Committee (attended by the Group's Chairman and Chief Executive Officer, the Deputy Chief Executive Officer, as well as the Finance, Legal, Human Resources, Purchasing, Investor Relations, Sponsorship, CSR and Compliance Departments), and the consideration of CSR and compliance issues by all governance bodies, due diligence is carried out at the highest levels of the company's business strategy, with ESG issues being fully taken into account.</p> <p>This approach thereby contributes to the Group's economic efficiency, by ensuring that the necessary resources are allocated to the various projects with the appropriate risk/return ratio, while reducing the costs associated with legal, financial and operational risks.</p> <p>The Group's commitment to due diligence on sustainability issues is reflected in its ethical provisions: the Group's Ethics and CSR Charter and Code of Conduct (signed by the Group's Chief Executive Officer) are the fundamental documents on which other CSR charters are based, themselves signed at the highest hierarchical level for each risk-bearing entity (the Responsible Purchasing Charter is signed by the Head of Purchasing, while the Diversity and Inclusion Charter is signed by the Head of Human Resources).</p> <p>Alongside economic objectives, the governance bodies have approved ESG objectives since 2020.</p>
<b>b) Collaborate with relevant stakeholders at all due diligence stages</b>	<p>All the Group's business partners are involved in the due diligence process.</p> <p>Due diligence is carried out prior to all new acquisitions, investments or partnerships, by including ESG issues on the agendas of all meetings of the Group's governance bodies. A risk assessment is carried out based on the ESG issues identified upstream of a project, and audits may be performed if deemed necessary, with interviews, site visits and document reviews organized in order to assess risks.</p> <ul style="list-style-type: none"> <li>• The Group's purchasing teams, and employees in risk-bearing professions or functions, are specifically targeted by awareness-raising and training initiatives, with the aim of making them directly involved in the vigilance process. Suppliers and subcontractors are the subject of selection, validation and continuous evaluation processes that incorporate ESG criteria. Suppliers identified as high-risk are also subject to in-depth screening. As stated in the Group's ethics charters and CSR clause, ESG audits may be carried out where a risk is suspected or identified.</li> <li>• ESG risk management workshops are organized each year within the Group's business lines. In this way, the CSR Department ensures that the Group's ESG strategy trickles down and that the achievement of these objectives is monitored by its network of CSR officers in all divisions, involving the support and operational functions.</li> </ul> <p>These initiatives enable us to adapt to new market expectations while prioritizing sustainable performance.</p>
<b>c) Identify and assess negative impacts</b>	<p>The Bolloré Group does not tolerate any breach of its Code and encourages its stakeholders to report any action that would be contrary to it.</p> <p>Due diligence measures, deployed throughout the value chain, are based on the compliance procedure, which describes the process of assessing the specific risk generated by a current or proposed relationship with a particular supplier or subcontractor. It provides for classification into four types of risk: minor, moderate, high and major, and details the actions and procedures to be applied. Our teams use internationally recognized standards to assess the criticality of ethical issues related to business conduct and social and human rights issues in certain territories.</p> <p>Specific teams within the Internal Control Department, the Audit Department and the Compliance Department are responsible for identifying and assessing negative impacts with a view to preventing or remedying risks.</p> <p>More specifically, the mapping of ethical risks aims to identify, assess, prioritize and manage the inherent risks, taking into account the specific characteristics and diversity of the organizations in terms of business sectors, business lines or the geographical areas in which the Bolloré Group's activities and divisions operate. The objective is to contribute to the management of risks covering all of the Group's managerial, operational and supports processes by giving compliance players the visibility necessary to establish proportionate prevention and detection measures adapted to the risks identified, so as to facilitate the implementation of these measures and any necessary remedial measures.</p> <p>For direct activities, the deployment of reporting campaigns on ESG indicators and the monitoring of those indicators by central teams serve to identify the Group's performance and the emergence of negative impacts on human health and safety or the environment.</p>
<b>d) Take steps to remedy these negative impacts</b>	<p>All the Group's business lines apply a proactive approach to risk management with a view to promoting responsible growth and improving the company's resilience and competitiveness.</p> <p>They rely on a duty of care cycle approach based on:</p> <ul style="list-style-type: none"> <li>• identifying risks;</li> <li>• developing and monitoring associated action plans;</li> <li>• setting objectives and reporting on the results of the mechanisms implemented.</li> </ul> <p>This approach ensures at each stage of the due diligence 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.</p> <p>In addition, the Group's online whistleblowing system is used to receive alerts and complaints on all types of ESG issue. Whistleblowers' alerts are processed at the head office level and overseen by the Chair of the Ethics – CSR and Anticorruption Committee, which carries out its mission independently. 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 timeframe, 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.</p>



Key elements of reasonable care    Bolloré Group

<b>e) Monitor and communicate the effectiveness of these efforts</b>	<p>In addition to reports on CSR performance to the Executive management team and the Board of Directors through the various governance bodies, and the monitoring of ESG risk management by the various risk-bearing business units (HR, purchasing, legal and QHSE), external rating agencies carry out annual assessments of the Group's ESG performance in these areas.</p> <p>Internally, our annual assessment methods and the analysis of our resources and results indicators are monitored, adjusted and enriched each year. Shared and studied internally with a view to constant improvement and performance monitoring, the most relevant data is published in institutional documents to illustrate our strong grasp of ESG issues. ESG performance is also incorporated into presentations at Annual General Meetings and meetings with analysts.</p>
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### 1.3.4. RISK MANAGEMENT AND INTERNAL CONTROLS OVER ESG REPORTING (GOV-5)

*For more information, please refer, in this universal registration document, to chapter 3 – The Bolloré Group's risk factors and internal controls.*

The risk management and internal control system for sustainability information is based on a number of key features designed to ensure the reliability, transparency and compliance of the information provided in the sustainability report. The main features are set out below:

#### 1.3.4.1. IDENTIFYING AND EVALUATING SUSTAINABILITY RISKS

This system serves to identify and prioritize the main environmental, social or governance-related sustainability risks across the value chain (ESG criteria). This includes image-related, regulatory compliance and financial risks associated with the management of sustainability issues. CSR risk mapping was previously introduced to meet the requirements of the extra-financial performance statement and the duty of care. The policies and associated action plans described in the sustainability report on environmental issues (ESRS 1 and 2), social issues (ESRS S1, S2 and S4) and business conduct issues (ESRS G1) reflect material sustainability issues. The main risks and impacts considered to be material relate to tackling climate change; in relation to employment, skills management and development, employee health, safety and working conditions, diversity and inclusion, social dialogue, and respect for human rights and working conditions in the upstream value chain; in relation to society, to the safety of consumers and end users, and to the protection of personal data; and in relation to governance, business ethics and corruption. Each IRO is described in detail within the corresponding thematic ESRS (E1, Entity-specific, E2, E5, S1, S2, S4 and G1).

In 2024, a double-materiality assessment, described in detail later in this chapter, was carried out with the assistance of expert firms and in accordance with a precise methodology, to identify the impacts, risks and opportunities affecting the Bolloré Group and all its activities, as required under the new

CSRD. This double-materiality assessment assessed these IROs from two perspectives: their impact on the company and their impact on the environment and society in general. These IROs were given a rating for each activity, and the results of this assessment were used to prioritize the most material IROs, in order to adapt action plans aimed at continuously improving risk controls. The methodology used for this DMA is described in the following pages. It will be updated on a regular basis (at least once a year), particularly on changes in scope, and details will be provided annually in the sustainability report, which will cover new risk assessments and the tools deployed across the Group's activities and value chain.

All the above-mentioned governance bodies have been informed by Bolloré's CSR Department of the work involved in carrying out the double-materiality assessment. The process as a whole was overseen by a Bolloré Holding company Steering Committee, comprising the CSR, Compliance, Human Resources, Finance, Purchasing, Legal, Audit and Investor Relations teams.

This comprehensive analysis has allowed the Group to identify, assess and prioritize the IROs linked to the ESG issues faced by the Group. The conclusions were presented to a selection of stakeholders, and then presented internally at Committee meetings, to ensure that decisions could be made in an informed manner and to increase the transparency and accountability of the management bodies on these issues.

#### 1.3.4.2. IMPLEMENTATION OF INTERNAL CONTROL PROCEDURES

Procedures have been drawn up to ensure that the data collected and published on the sustainable performance of our various business activities is reliable, accurate and complete. These procedures include checks on data collection processes (e.g. CO<sub>2</sub> emissions and social impact) and checking their consistency with regulatory standards and frameworks, such as the CSRD, or, for example, the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD). The Group CSR Department uses a

computerized data collection tool that is managed by the Group Head of Reporting, who is supported by a network of contributors across all Bolloré Group entities. Consistency checks are carried out directly within the IT system in order to identify potential errors. The Group Heads of CSR Reporting in the CSR and Human Resources Departments are responsible for collecting, verifying and consolidating all quantitative indicators from contributors at the Group's subsidiaries and the various head office support functions.

#### 1.3.4.3. DATA TRACEABILITY AND TRANSPARENCY: INTERNAL AND EXTERNAL AUDITS

The traceability of sustainability information is key. This means that the Group is able to trace the source of the data and demonstrate how it has been collected, consolidated and reported. This guarantees not only transparency but also the ability to respond to external audits. To ensure that the information provided is complete, annual external audits are carried out to assess the effectiveness of the system. Consultants can verify the reliability

of data, assess non-compliance risks and suggest improvements to the process. This procedure will be strengthened in future years, with the Group's Internal Audit Department increasingly involved. Meetings were held with the Bolloré Group's Internal Audit Department in 2024, and employees are being recruited so that this role can be brought in-house in 2025.

#### 1.3.4.4. RESPONSIBILITY AND GOVERNANCE

A governance system is in place, as explained above in the CSR Governance System section, which described the Group's structure and the various governance bodies that discuss and validate ESG issues. Roles and responsibilities in terms of managing these risks and issuing sustainability reports are defined. Responsibility is shared between the members of the Committees (Executive Committee, Audit Committee, Risk Committee, Ethics – CSR and Anticorruption Committee) and the internal CSR functions.

#### 1.3.4.5. TRAINING AND AWARENESS-RAISING

Employees need to receive training in order to ensure that they understand the importance of sustainability issues and master the data collection and verification processes. Raising awareness of these issues also reinforces the company's internal risk management and sustainable performance culture: the Group requires all employees to take mandatory e-learning modules (covering climate issues, human rights in the workplace, inclusion and diversity, anticorruption issues, etc.); more specific training is provided to

The Group's commitments are summarized in the Ethics and CSR Charter and Code of Conduct distributed to all employees and Tier 1 suppliers. This Code of Ethics, updated in 2024, is binding on all people acting on behalf of the Bolloré Group, and contains details of expected behavior. It formalizes recommendations to prevent, identify and report any breaches or high-risk activity, particularly through the professional whistleblowing system.

#### 1.3.4.6. IT TOOLS

As part of their sustainability management systems, the Bolloré Group's CSR and HR Departments use the Enablon IT tool, which automates the collection, analysis and monitoring of sustainability indicators. This tool is used to manage and archive data. Through its interface, which reminds contributors of

those in roles directly associated with reporting, such as the heads of QHSE or CSR at subsidiaries in the contributors' network (each year, the Group Head of CSR Reporting organizes training sessions in the run-up to the launch of the annual reporting campaign to familiarize teams with the reporting tool and the various concepts associated with regulatory changes), as well as to purchasers and HR managers affected by issues specific to their sectors.

#### 1.3.4.7. COMMUNICATION AND TRANSPARENCY

The Group reports on its ESG risks and any mitigation actions in its sustainability report, published annually, which accompanies the management report and which, in 2024, replaced the extra-financial performance statement. The purpose of this report is to provide information to stakeholders, in particular investors and rating agencies.

the definitions of indicators and the calculation methodologies, it facilitates compliance and reduces human error thanks to the automation of data consolidation and consistency checks intrinsic to the tool.

This methodical approach to ESG risk management is aimed not only at complying with regulatory obligations, but also at anticipating future impacts by integrating sustainability into our overall strategy.

### 1.3.5. DIALOGUE WITH OUR STAKEHOLDERS (DR: SBM-2)

The Group and its businesses are committed to taking the expectations and concerns of their internal and external stakeholders into account, at all levels of the organization. However, we have not yet standardized our approach to consolidating these dialogues at Group level, nor have we yet been able to issue formal procedures and results. Discussions are being held with our stakeholders on formalizing a dialogue process in the medium term, and how the expectations arising from the dialogue process are to be implemented. Entities maintain an ongoing dialogue (detailed in the table below) with local communities, customers, suppliers, subcontractors and employees, in a way that is adapted to their local and operational environments. The dialogue between the Bolloré Group and its principal stakeholders may take the form of team meetings, surveys, responses to rating agencies, discussion meetings, partnerships, consultation meetings and collaborative projects, etc. Moreover, in 2023, nearly 100% of Group entities completing the CSR reporting declared they were certified or had at least one site that was ISO 9001-certified site and, as part of this process, the relevant stakeholders need to be mapped.

At head office level, the Group is also attentive to the requirements of its external stakeholders, including banks, investors and rating agencies. In 2021, the CSR Department identified the Group's stakeholders and identified their priority issues, expectations and level of influence vis-à-vis the Group. Taking these expectations and needs into account at local level has strengthened the effectiveness of due diligence systems, and helped build a long-term relationship based on trust.

The Bolloré Group's objectives in maintaining ongoing dialogue with its stakeholders are multiple and it is committed to responsible governance, the management of impacts, risks and opportunities (IROs), and long-term value creation. The main objectives are as follows:

1. improving transparency and trust among all stakeholders;
2. anticipating and managing risks: by listening to the expectations and concerns of its various stakeholders, the Group is able to identify potential risks (social, environmental, regulatory and reputational risks) more quickly and take steps to mitigate them;
3. fostering innovation and continuous improvement: dialogue with stakeholders can provide valuable feedback or suggestions that can help to improve the company's products, services or processes;
4. increasing legitimacy and enhancing its reputation;
5. facilitating social acceptance: certain activities, including industrial or oil logistics activities, may have local impacts. Engaging in dialogue with local residents allows the Group to optimally develop and pursue our activities;
6. strengthening internal cohesion and employee commitment: dialogue with employees, who are key stakeholders, is a key factor in commitment and motivation, and fosters a collaborative corporate culture and the sharing of Group values;
7. alignment with ESG (Environmental, Social and Governance) criteria: the Group seeks to demonstrate its commitment to corporate social responsibility (CSR). Dialogue with stakeholders plays a key role in incorporating these concerns into the company's strategy.

In short, establishing dialogue enables the Group to reconcile economic performance with social and environmental responsibility, and thereby make its business activities sustainable in an increasingly complex and interconnected environment.



Definition of the Group's stakeholders	Dialogue methods	Frequency	Sustainability expectations	Principles of CSR action	Illustrative examples of the 2024 dialogue with stakeholders
<b>Customers</b> BtoB customers BtoC customers	<ul style="list-style-type: none"> <li>Team meetings</li> <li>Satisfaction surveys</li> </ul>	<ul style="list-style-type: none"> <li>Ongoing<sup>(1)</sup></li> <li>Regular<sup>(2)</sup></li> </ul>	<ul style="list-style-type: none"> <li>Excellence and quality of our products and services.</li> </ul>	<ul style="list-style-type: none"> <li>Ensuring the quality and safety of products.</li> <li>Informing customers, raising their awareness and ensuring that they are satisfied.</li> <li>Innovating in response to environmental challenges.</li> </ul>	<ul style="list-style-type: none"> <li>Group and Bolloré Energy: meeting with a BtoC customer to present the division's double-materiality assessment.</li> <li>Bolloré Innovative Thin Films: consultation of a customer in the agri-food industry to carry out a withdrawal-recall test in connection with the packaging film business.</li> <li>Blue Solutions: investment in R&amp;D projects.</li> </ul>
<b>Suppliers and subcontractors</b> Suppliers of materials, services, transport and other resources essential to the Group's business activities and subcontractors	<ul style="list-style-type: none"> <li>Discussion meetings</li> </ul>	<ul style="list-style-type: none"> <li>Regular</li> </ul>	<ul style="list-style-type: none"> <li>Compliance with the guarantee concerning decent working conditions.</li> </ul>	<ul style="list-style-type: none"> <li>Establish solid partnerships with suppliers, in particular through the responsible purchasing approach.</li> <li>Ensuring compliance with working conditions.</li> </ul>	<ul style="list-style-type: none"> <li>Group: signature of charters and codes of conduct, and inclusion of CSR clauses in contracts.</li> <li>Purchasing: discussions and dialogue during the tendering phase and supplier evaluation using the EcoVadis tool.</li> <li>Bolloré Innovative Thin Films: consultation with the water supplier to anticipate occasional periods of overconsumption.</li> </ul>
<b>Employees</b> The people employed by the Group in its various business sectors are key stakeholders because of the role they play in carrying out operations and their dependence on the company's success in relation to their employment and working conditions.	<ul style="list-style-type: none"> <li>Team meetings</li> <li>Social dialogue (CSE)</li> <li>Individual meetings</li> </ul>	<ul style="list-style-type: none"> <li>Weekly</li> <li>Monthly</li> <li>Annual</li> </ul>	<ul style="list-style-type: none"> <li>Career development, access to training opportunities, fair working conditions, employment benefits, work-life balance, transparency and communication, CSR commitment and fair pay.</li> </ul>	<ul style="list-style-type: none"> <li>Sustainable development awareness-raising campaigns.</li> <li>Skills development</li> <li>Promoting social dialogue and an inclusive working environment.</li> </ul>	<ul style="list-style-type: none"> <li>Group: e-learning; internal communications initiatives (Pink October, Movember, International Disability Day, International Anticorruption day, etc.); organization of company seminars; annual appraisals; social dialogue with employee representative bodies.</li> </ul>
<b>Investors and the financial community</b> (shareholders, rating agencies, regulatory authorities)	<ul style="list-style-type: none"> <li>Annual General Meetings</li> <li>Financial reports</li> <li>Responses to rating agencies</li> </ul>	<ul style="list-style-type: none"> <li>Quarterly</li> <li>Annual</li> <li>Annual</li> </ul>	<ul style="list-style-type: none"> <li>Integrating ESG requirements into the Group's strategy.</li> <li>Access to extra-financial information and transparency.</li> </ul>	<ul style="list-style-type: none"> <li>Responses to requests from rating agencies, investors, financial analysts and banks.</li> <li>Incorporating their requirements into reports.</li> </ul>	<ul style="list-style-type: none"> <li>Group: Responding to ESG questionnaires (CDP, Sustainalytics, Moody's).</li> <li>Presentation of the Group's double-materiality assessment to a panel of financial and ESG analysts.</li> <li>Discussions with the AMF and investors.</li> </ul>
<b>Public authorities</b> (local, national and international), <b>international organizations and trade federations</b>	<ul style="list-style-type: none"> <li>Discussion meetings</li> <li>Consultancy and legal support</li> </ul>	<ul style="list-style-type: none"> <li>Ongoing</li> <li>Regular</li> </ul>	<ul style="list-style-type: none"> <li>Voluntary commitment by the company to ESG issues.</li> <li>Compliance with environmental regulations, workers' rights and transparent reporting.</li> <li>Continued employment.</li> <li>Local communities and people living near the Group's sites do not expect any negative external impacts from industrial activities.</li> </ul>	<ul style="list-style-type: none"> <li>Bringing the Group into line with the expectations of CSR-related regulations.</li> <li>Regulatory monitoring and active participation in inter-professional think tanks.</li> <li>Adherence to the United Nations Global Compact.</li> <li>Involvement by subsidiaries of public authorities in their health-safety and environment issues.</li> </ul>	<ul style="list-style-type: none"> <li>Group: sector-wide strategic decision-making, participation in regular consultations, collective bargaining processes. Meetings with trade associations. Annual publication of a Communication on Progress (COP).</li> <li>Bolloré Energy: organization of a site monitoring committee with the prefecture, the DREAL, the fire department and local associations. Organization of 5 crisis management exercises in 2024 on all mass storage depots with the DREAL and fire departments. 5 DREAL inspections carried out this year.</li> <li>Bolloré Innovative Thin Films: consultation with the DREAL and SDIS to present site development projects as part of prevention and adaptation plans.</li> </ul>

Definition of the Group's stakeholders	Dialogue methods	Frequency	Sustainability expectations	Principles of CSR action	Illustrative examples of the 2024 dialogue with stakeholders
<b>NGOs, associations and recipients of sponsorship</b>	<ul style="list-style-type: none"> <li>Joint ventures</li> <li>Consultation meetings</li> <li>Collaborative projects</li> </ul>	<ul style="list-style-type: none"> <li>Regular</li> <li>Regular</li> <li>Regular</li> </ul>	<ul style="list-style-type: none"> <li>Transparency and accessibility of information.</li> <li>Compliance with the Group's ESG commitments and international standards.</li> </ul>	<ul style="list-style-type: none"> <li>Responding to requests from NGOs asking the CSR Department about its actions.</li> <li>Collaboration on initiatives with positive impacts.</li> </ul>	<ul style="list-style-type: none"> <li>The Sponsorship and Solidarity Commitment Department has developed a program aimed at supporting projects that empower young people and have a significant social impact on both younger generations and local communities.</li> </ul>
<b>Media</b>	<ul style="list-style-type: none"> <li>Discussion meeting</li> </ul>	<ul style="list-style-type: none"> <li>Ongoing</li> </ul>	<ul style="list-style-type: none"> <li>Transparency and accessibility of information</li> </ul>	<ul style="list-style-type: none"> <li>The communications department has a press unit that specifically interacts with journalists, and the CSR Department is available to answer any questions.</li> </ul>	<ul style="list-style-type: none"> <li>Press releases, trade shows and press briefings, interviews, etc.</li> </ul>

(1) Dialogue conducted continuously or almost continuously over the period from January 1, 2024 to December 31, 2024.

(2) Dialogue conducted at constant intervals over the period from January 1, 2024 to December 31, 2024.

## 1.4. Impact, risk and opportunity management (SBM-3)

### 1.4.1. IDENTIFICATION OF IROS AND METHODOLOGY OF DOUBLE-MATERIALITY ASSESSMENT (DR: IRO-1)

In general, the Group periodically assesses and reviews the risk factors likely to have a negative impact on its activities or results. This review is presented to the Risk Committee. In addition, several elements specific to the Bolloré Group and its strategy, such as the diversification of its activities and geographical locations, limit the significance of the risks to which the Group is exposed. In 2024, the Bolloré Group carried out a double-materiality assessment based on the new European Union regulations, taking account of actual and potential, positive and negative impacts on the various stakeholders as well

as financial risks and opportunities. The double-materiality assessment was carried out jointly with third parties (consulting firms) to cover the Group's obligations under the CSRD.

The Head of CSR presents the assessment of social, societal and environmental impacts and risks to the Risk Committee. All the risks identified are described in this universal registration document, in chapter 3 – Risk factors and internal control.

### 1.4.2. GENERAL PROCESSES AND RESPONSIBILITIES

#### 1.4.2.1. CARRYING OUT THE ASSESSMENT

Before being consolidated at Bolloré Group level, three individual double-materiality assessments (DMAs) were carried out for the different business sectors:

- Bolloré Energy – (Oil logistics);
- Blue and Bolloré Innovative Thin Films (ITF) – (Industry)<sup>(1)</sup>;
- Systems – (Industry).

This work was based first and foremost on the principle of consistency with existing assessments and reports, notably the historical mapping of extra-financial risks, the universal registration document, and responses to questionnaires from extra-financial rating agencies.

The entire process (determining challenges, description of IROs, development of rating scales, rating workshops and validation of the results of the DMA and

feedback) was overseen by a Bolloré Holding Steering Committee made up of the CSR, Compliance, Human Resources, Finance, Purchasing, Legal, Audit and Investor Relations teams.

The Group's CSR, Finance and Human Resources Departments participated in issuing weekly updates as the materiality matrices for the Group's activities were drawn up. It should be noted that the Finance Department was particularly involved in defining the rating scales. The IROs for each issue were prepared by the respective consulting firms engaged by the Bolloré Group.

This pre-rating was then shared with the subsidiaries' Management Committees and Heads of HSE/CSR, and with the Managers of the Group's support functions prior to the rating workshops, which involved around thirty people. The rating process is explained below.

#### 1.4.2.2. RESPONSIBILITY FOR UPDATING AND VALIDATING THE DOUBLE-MATERIALITY ASSESSMENT

The CSR Department is responsible for organizing, updating and communicating the Group's double-materiality assessment, in close collaboration with the Finance and Human Resources Departments. Meetings were held in July 2024 to validate the results of the double-materiality assessments at the level of the different businesses and for consolidation at Bolloré Group level with the various members of the Management Committees of the business lines and the members of the Holding Steering Committee. Bolloré also selected five key stakeholders with which specific workshops were carried out with a view to better understanding their interests in the Group's sustainability challenges and obtaining their views on the results of the double-materiality assessment (banks, financial analysts, a professional association and a customer).

The results of all the work on the Bolloré Group's DMA were approved by the Audit Committee in March 2025.

The issues, IROs and ratings in the materiality matrix will be updated at least once every three years, and every year on the occurrence of material events. If a material event occurs, the set of challenges and ratings will have to be reconsidered with a view to reassessing the appropriateness of the matrix-based assessment. The following is a list of material events that would require the matrix to be reviewed:

- material acquisitions, sales and closures of subsidiaries with a significant impact on Bolloré's business models and activities;
- significant controversies or material compliance issues;
- events with a significant impact on the Group (e.g. natural disasters, health crises, etc.);

(1) With a view to optimization, a joint double-materiality assessment was carried out for these two businesses, as their production sites are on the same land.

- material changes to its business model or strategy;
- changes to the CSRD;
- changes in the expectations of stakeholders: changes to questionnaires from rating agencies, reports by NGOs, greater awareness of civil society, etc.

The IROs will be communicated annually, in accordance with the CSRD guidelines and market practices, in the sustainability report.

If the Bolloré Group concludes, on the basis of appropriate evidence, that the results of the materiality assessment carried out in the previous reporting

period are still relevant at the date on which the declaration is published, the sustainability report may be based on pre-established information.

This may be the case, for example, when the company believes that there have been no material changes to its organizational and operational structure, and that there have been no material changes to external factors that may give rise to new IROs or alter existing IROs, or that may affect the appropriateness of a specific disclosure.

### 1.4.3. SCOPE OF THE DOUBLE-MATERIALITY ASSESSMENT

In order to cover the entire Bolloré Group, the financial scope was used as the basis for the assessment. All the entities operating in the following business sectors were considered in determining the scope (in accordance with the ANC guide (question 2.7), the entities that need to produce a specific double-materiality assessment were identified, and the entities that are exempt from producing a specific double-materiality assessment were the subject of a dedicated methodological note):

- Oil logistics: Bolloré Energy;
- Industry: Blue; Bolloré Innovative Thin Films (ITF); Systems;
- Exemption of other assets – transport activities, agricultural activities, holding companies – relatively insignificant in terms of revenue, workforce, impact or own issues and the associated risks that could be material at Group level. An additional risk assessment was carried out to ensure that the issues and risks were immaterial.

The double-materiality assessments carried out for each activity cover the entire value chain, broken down into three zones: upstream, own operations and downstream, as well as all stakeholders who may be directly or indirectly affected by the activities of the various entities. For each entity that was the subject of a specific double-materiality assessment, the assessment therefore covered the risks and opportunities and the positive and negative impacts of each link in the value chain, which were then taken into account in the IRO rating process. By way of illustration, in the upstream part of the value chain, the most significant IROs in respect of Tier 1 suppliers and above were taken into account and evaluated. The ratings reviewed by in-house experts also covered suppliers in all value chains.

A method was determined for consolidating the double-materiality assessments for its business activities into the Bolloré Group's overall double-materiality assessment, and is described below.

### 1.4.4. DETERMINING BOLLORÉ'S CHALLENGES

The first step was to identify the environmental, social and governance issues relevant to the Group.

This list was defined based on the 37 sustainability issues and associated sub-issues defined in the CSRD's ESRS standards (ESRS 1). The 37 issues listed in ESRS 1 were critically reviewed to assess their relevance to the Bolloré Group's business activities.

The relevant ESG challenges were determined in the following manner:

**Three ESRS 1 issues were considered to be irrelevant and were therefore removed from the list of issues affecting the Group's business activities:**

- communities' civil and political rights; as a result of the countries in which it operates (Europe, United States and Canada);
- rights of indigenous peoples; also as a result of the countries in which it operates and due to the nature of their activities, the location of their offices, the number of employees and compliance with local laws;
- animal welfare; as a result of the business sectors in which the Group operates.

**Seven ESRS E2 issues were grouped together with different names for each Bolloré business (Operating accidents for Bolloré Energy, Industrial accidents for Blue and Bolloré Innovative Thin Films, Industrial pollution for Systems):**

- pollution of air;
- pollution of water;
- pollution of soil;

- pollution of living organisms and food resources;
- direct impact drivers of biodiversity loss;
- impacts on the state of species;
- impacts on the extent and condition of ecosystems.

**Two ESRS E2 issues were grouped together under "Substances of (very high) concern":**

- substances of concern;
- substances of very high concern.

**Two ESRS G1 issues were grouped together under "Ethics and compliance":**

- corporate culture;
- corruption and bribery.

**Four social sub-sub-topics were raised to the level of sub-topics for ESRS S1 and ESRS S2:**

- health and safety;
- training and skills development;
- forced labor;
- child labor.

The defined group of issues resulted in a list of 32 sustainability issues and was reviewed by the CSRD Steering Committee prior to the IROs being defined:

ESRS	CSRD issues (ESRS 1)	Issue redefined by Bolloré
E1	Climate change adaptation	Climate change adaptation
	Climate change mitigation	Climate change mitigation
	Energy	Energy
E2	Pollution of air	
	Pollution of water	
	Pollution of soil	Industrial accidents and pollution
	Pollution of living organisms and food resources	Operating accidents
	Direct impact drivers of biodiversity loss	
	Impacts on the state of species	
	Impacts on the extent and condition of ecosystems	
	Substances of concern	Substances of (very high) concern
	Substances of very high concern	
	Microplastics	Microplastics

## 2 SUSTAINABILITY REPORT

### 1. General principles (ESRS 1 and ESRS 2 cross-cutting standards)

ESRS	CSRD issues (ESRS 1)	Issue redefined by Bolloré
E3	Water	Water (consumption, withdrawals and discharges)
	Marine resources	Extraction and use of marine resources
E4	Impacts and dependencies on ecosystems	Biodiversity
E5	Resources inflows, including resource use	Use of natural resources
	Resource outflows related to products and services	Repairability, durability and recyclability of products
	Waste	Waste
S1	Working conditions	Working conditions and social dialogue (in operations)
		Employee health and safety (in operations)
	Equal treatment and opportunities for all	Diversity, equity and inclusion (in operations)
		Training and skills development (in operations)
	Other work-related rights	Forced labor and child labor (in operations)
S2	Working conditions	Working conditions in the value chain
		Health and safety in the value chain
	Equal treatment and opportunities for all	Diversity, equity and inclusion in the value chain
	Other work-related rights	Forced labor and child labor in the value chain
		Privacy in the value chain
S3	Communities' economic, social and cultural rights	Impact on local communities (safety incidents, freedom of expression, free prior consent)
	Communities' civil and political rights	
	Rights of indigenous peoples	
S4	Information-related impacts for consumers and/or end users	Protection of the personal data of consumers and end users
	Safety of consumers and/or end users	Safety of consumers and end users
	Social inclusion of consumers and/or end users	Access to products and services
G1	Corporate culture	Ethics and compliance
	Corruption and bribery	
	Protection of whistleblowers	Protection of whistleblowers
	Animal welfare	
	Political engagement	Political commitment and lobbying activities
	Management of relationships with suppliers including payment practices	Relationships with suppliers
<b>Total</b>	<b>37</b>	<b>32</b>

#### 1.4.5. DESCRIPTION OF THE IMPACTS, RISKS AND OPPORTUNITIES (IROS) ASSOCIATED WITH EACH TOPIC

For each business activity, the following process was implemented:

- for each of the 32 E, S and G issues identified, the experts defined the following:
  - the link(s) in the value chain affected by the issue (direct operations, upstream, downstream) at the level of the IROS,
  - all the main positive and negative impacts (impact materiality),
  - all the main risks and opportunities (financial materiality).

As a result, for each type of IRO, a number of categories have been identified based on the typologies already covered by the CSR and due diligence risk maps. The impact categories were redesigned to separate impacts on health

and safety from impacts on human rights. A specific category for socio-economic impacts has been added to capture certain impacts, for example, those specific to governance issues. In the case of this double-materiality assessment exercise, a number of impacts and risks were identified and associated with opportunities that are further developed in this sustainability report.

The 300 defined IROS cover the operations and value chains of the Group's various businesses. They were reviewed at a meeting of the Holding Steering Committee prior to the pre-rating exercise.

### 1.4.6. SCALES AND RATING METHODOLOGY

In relation to financial materiality, discussions were held with the Finance Department to capitalize on its knowledge of the activities and their existing ratings. In relation to impact materiality, the existing mapping work carried out by the Group was used to determine the four levels of the rating scale.

A scale of 0 to 4 with the average rating set at 2 was chosen for financial and impact materiality, with ratings for each IRO, with no decimal numbers. As required under the CSRD, the rating scales for the issues combine frequency of occurrence and severity.

- Frequency of occurrence can be determined in two different ways:
  1. historical frequency of an existing event (over the previous five years);
  2. probability of the event occurring.
- There are two parameters to the severity of financial materiality:
  1. financial;
  2. legal and compliance.
- There are three parameters to the severity of impact materiality:
  1. scale: scale of the impact;
  2. scope: magnitude of the impact;
  3. irremediable character: irremediable character of the impact.

To assess the severity of the financial risk, a prioritized approach was applied:

- prioritize financial impacts based on:
  - the past experience of the divisions based on actual historical events over the last five years (maximum cost where there are multiple events);
  - regulatory fines and fixed penalties (based on the maximum amount);
- failing that, apply a qualitative criterion: reputational impact, which can affect the attractiveness of the Group and its business relationships.

Each IRO has therefore been assigned a severity rating and a probability of occurrence rating.

The rating assigned to an issue (comprising multiple IROs) therefore corresponds to:

- impact materiality:  $[\text{MAX}(\text{Scale}, \text{Scope}, \text{Irremediability}) \times \text{MAX}(\text{Frequency})]/4$ ;
  - financial materiality:  $[\text{MAX}(\text{Financial}, \text{Reputational}) \times \text{MAX}(\text{Frequency})]/4$ .
- If a negative impact relating to human rights is identified, the severity of the impact takes precedence over its probability.

A meeting of the Steering Committee was held on March 12, 2024 to validate the scales and rating methodology.

### 1.4.7. DRAWING UP RATINGS

For financial and impact materialities, all IROs have been rated on a gross basis, i.e. before the implementation of mitigation measures. The IROs associated with each issue were first pre-rated by the consulting firm, based on the four-level scales defined previously. In all, around 300 IROs were pre-rated. Subsequently, rating workshops were organized with each of the Group's business lines in the presence of the Management Committees: Bolloré Energy, Blue, Bolloré Innovative Thin Films and Systems. At these workshops, the initial versions of the materiality matrices were presented to the participants. Their in-depth knowledge of the businesses and operations

was used to identify any necessary adjustments and to ensure that the results and associated justifications were reliable.

The ratings may be updated as a result of:

- regulatory monitoring;
- internal or external alerts via dedicated lines;
- specific reviews and mapping exercises;
- the severity and frequency of controversies;
- dialogue with external stakeholders.

### 1.4.8. CONSOLIDATION OF RATINGS AND MATERIALITY THRESHOLDS

The Group materiality matrix is created by consolidating the following materiality matrices: Bolloré Energy, Systems, Blue, and Bolloré Innovative Thin Films.

The consolidation of these activities is based on two principles.

#### Weighting principle

In order to reflect the contribution made by each business activity within the Group, the rating of each issue was weighted, from an impact materiality and financial materiality perspective, based on:

- revenue: for environmental and governance issues;
- workforce: for social issues.

The weighting factors have been calculated based on accounting data for the fiscal year ended December 31, 2023.

#### Principle of criticality

In addition to the weighting principle, the criticality principle reflects the presence of a major issue in one of the Group's business activities. Where a business activity has identified an issue with an impact materiality or financial materiality rating of four, the issue is escalated to Group level, irrespective of the weighting.

The principle of criticality specifically identified the following three issues:

- the safety of consumers and end users;
- working conditions in the supply chain;
- health and safety in the supply chain.

### 1.4.9. DESCRIPTION OF THE DMA

The Group's set of challenges can be broken down as follows:

32 challenges that affect all Bolloré's historical divisions.

For the purposes of this sustainability report, certain issues have been grouped together under a common heading in order to coherently follow the structure of the report:

**Three CSRD ESRS E1 issues have been grouped together under "Climate change":**

- climate change adaptation;
- climate change mitigation;
- energy.

**One "entity-specific" issue has been added to "Industrial and operating accidents":**

- industrial accidents and pollution;
- operating accidents.

**Three other CSRD ESRS E5 issues have been grouped together under "Circular economy":**

- waste;
- use of natural resources;
- repairability, durability and recyclability of products.

**Two CSRD ESRS S1 and S2 issues have been grouped together under "Privacy":**

- privacy (in operations);
- privacy in the value chain.

**Three CSRD ESRS S2 issues have been grouped together under "Human rights in the value chain":**

- working conditions and social dialogue in the value chain;
- health and safety in the value chain;
- forced labor and child labor in the value chain.

**Two CSRD ESRS G1 issues have been grouped together under "Business ethics and anticorruption":**

- ethics and compliance;
- protection of whistleblowers.

The rating used for these consolidated issues corresponds to the maximum rating for the individual issues they cover. Ultimately:

- the materiality threshold has been set at 2/4;
  - as such, the issues are material for the purposes of the CSRD in the following three scenarios:
1. material in terms of financial materiality, where financial materiality exceeds 2/4,

2. material in terms of impact materiality, where impact materiality exceeds 2/4,
  3. material in terms of both financial and impact materiality, where both materialities exceed 2/4;
- the final ratings were presented at a feedback meeting of the CSRD Holding Steering Committee held on May 27, 2024, which validated the consolidated double-materiality assessment.

#### 1.4.10. PRESENTATION OF MATERIAL IROS, CONSULTATION OF STAKEHOLDERS AND INTERACTIONS WITH STRATEGY AND BUSINESS MODEL (SBM-3)

The Group and its subsidiaries are committed to taking into account the expectations of their internal and external stakeholders at all levels of the organization and in a way that is adapted to their local and operational environments.

##### 1.4.10.1. REVIEW OF RATINGS BY INTERNAL STAKEHOLDERS

The divisions contributed to the DMA exercise, with their Management Committees attending the rating workshops. Stakeholders' concerns about ESG issues were taken into account in the discussions held at the IRO rating workshops.

The members of the Management Committees have taken into account their knowledge of the expectations of internal and external stakeholders on E, S and G issues where those stakeholders may be affected by the Group's impacts:

- environmental authorities, in assessing the linked IROs under ESRS E2 and E3 on pollution and water;

- local authorities and local residents, in assessing the IROs under ESRS S3;
- customers and end users of products and services, in assessing the IROs under ESRS S4;
- suppliers, in assessing the IROs under ESRS G1 on payment practices, particularly for SMEs;
- employees and future employees in terms of corporate commitments (ESRS E, S and G).

##### 1.4.10.2. INTEGRATING THE VIEWS OF EXTERNAL STAKEHOLDERS

There is no requirement under the CSRD for stakeholders to be consulted when carrying out a double-materiality assessment. On the other hand, the existing processes for identifying and engaging with key stakeholders should be used to inform the assessment, as stakeholder engagement remains central to sustainability reporting principles.

To that end, Bolloré's existing risk assessments were used to identify the key stakeholders affected by the Group's activities, including in both its own operations and its value chain. This work constituted the first stage in identifying the key stakeholders affected, namely:

- **the Group's employees** – in particular via the Bolloré Group's existing risk analyses, the mapping of the Group's extra-financial risks and the results of an employee survey;
- **Group executives** – through qualitative and risk management meetings with the managers of subsidiaries, and through the meetings of the Ethics – CSR and Anti corruption Committee;
- **the upstream value chain:** local communities, the Group's suppliers and subcontractors, in particular via the Group's duty of care plan and non-financial risk mapping;
- **the downstream value chain:** customers – in particular through meetings, especially during the tender phase;
- **nature:** via the Bolloré Group's existing risk analyses, the mapping of the Bolloré Group's extra-financial risks, the duty of care plan, a physical climate risk assessment carried out by EY, and additional research in scientific literature;
- **investors** – notably via rating agency questionnaires.

Bolloré also selected five key stakeholders with which specific workshops were carried out with a view to better understanding their interests in the Group's sustainability challenges and obtaining their views on the results of the double-materiality assessment. These five key stakeholders were added to the aforementioned list of stakeholders affected by these issues.

List of stakeholders with whom a specific workshop was carried out in June and July 2024 in the presence of the CSR Department, the Finance Department, the Investor Relations Department and the consulting firm:

- a bank: discussions with financial institutions are interesting because they evaluate companies' ESG performance to evaluate their risks and their potential long-term sustainability, factoring in the expectations of various stakeholders;
  - financial and ESG analysts: they take account of investors' concerns, assess the way companies manage their ESG risks and provide recommendations;
- Banks and financial analysts, which are familiar with international ESG standards, help the Group to better understand how its ESG actions can affect its long-term performance, and provide a detailed analysis of the risks and opportunities that can help it to focus its strategy. Analysts and banks generally guide companies towards best practices in ESG reporting, in line with the increasing level of regulation in this area. This helps to provide reassurance to other stakeholders in relation to the company's transparency and governance.

As the Group's activities are diversified in nature, discussions with stakeholders are more appropriately carried out at the level of each business activity. However, the CSR Department opted to strengthen its analysis by consulting stakeholders specific to Bolloré Energy's business activities with the most significant environmental impacts for the Group. A BtoB customer and a Bolloré Energy trade association were consulted.

#### 1.4.11. PRESENTATION OF MATERIAL IROS AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL (SBM-1 AND SBM-3)

*The company's strategy and business model are presented in detail in this universal registration document, chapter 1 – Overview of the Group and its activities.*

Relevant impacts, risks and opportunities (IROs) for each issue have been identified via a double-materiality assessment of the Bolloré Group's activities. The work that was carried out was based on the principle of consistency with existing Bolloré assessments and reports, including the extra-financial risk mapping, the universal registration document, and responses to the DJSI and CDP questionnaires.

For each type of issue, the IROs were pre-rated by our consultants for the Bolloré Group's divisions (Bolloré Energy, Blue and Bolloré Innovative Thin Films, and Systems). These pre-ratings were then shared with Bolloré's internal experts prior to the validation workshops. The impact categories were redesigned to separate impacts on health and safety from impacts on human rights. For positive and negative impacts (impact materiality), the categories applied were: Environment, Health and Safety, Human Rights, Business Ethics and Anticorruption. For each IRO issue, the time horizons and the link(s) in the value chain affected by the issue (direct operations, upstream or downstream) were defined, as set out below.



ESRS	Issue	Summary of the principal material IROs	Upstream	Operations	Downstream
E1	Climate change	<ul style="list-style-type: none"> <li>– (NI) Damage/destruction of infrastructure belonging to Bolloré (depots, sites) following an extreme weather event, with potentially serious consequences for the environment</li> <li>– (NI) Carbon impact of products/services</li> <li>– (R) Transition risks and opportunities linked to regulatory changes</li> <li>– (O) Financial opportunity linked to the adaptation of historic product ranges to products with lower carbon emissions (biodiesel from rapeseed, synthetic biofuel)</li> </ul>		X	X
Entity-specific <sup>(1)</sup>	Industrial accidents (Blue and Bolloré Innovative Thin Films) and Operating accidents (Bolloré Energy)	<ul style="list-style-type: none"> <li>– (R) Risk of environmental degradation and serious harm to human health and/or access to food due to soil, air and water pollution resulting from the release of hazardous materials</li> <li>– (R) Risk of fire, explosion or release of hydrocarbons that could lead to the degradation or destruction of the ecosystem</li> <li>– (NI) Impact on species and on the extent and status of ecosystems</li> </ul>		X	X
E5	Circular economy	<ul style="list-style-type: none"> <li>– (PI) Waste management and reduction (e.g. battery waste)</li> <li>– (PI) Integration of recycled/virgin materials in products</li> </ul>	X	X	X
S1	Working conditions and social dialogue in operations	– (NI) Harm to employees' psychological and physical well-being due to excessive working hours or poor work-life balance (e.g. overwork, depression, risk of burn-out, etc.)		X	
	Employee health and safety (in operations)	– (R) Risk of workplace accidents (industrial accidents, road accidents), risk of occupational illness (e.g. risk of illness linked to the use of chemicals/hazardous products, etc.)		X	
	Diversity, equity and inclusion (in operations)	– (PI) Gender diversity, equal pay for men and women, inclusion at work		X	
	Training and skills development (in operations)	– (O) Talent attraction-retention, career management and development		X	
S2	Human rights in the value chain	– (R) Risk of occupational accidents in the upstream supply chain, risk related to the working conditions of workers in the value chain, risk of forced labor or child labor in the upstream value chain	X		
S4	Safety of consumers and end users	– (NI) Safety of products/services for end users (safety of access, batteries, buses, etc.)			X
	Protection of the personal data of consumers and end users	– (R) Risk of a breach of customers' and end users' personal data (data transiting via products/applications), invasion of privacy in the event of theft, misuse or dissemination of personal data	X	X	X
G1	Business ethics and anticorruption	– (R) Transparency in business relationships, prevention of anticompetitive practices	X	X	X

PI = positive impact / NI = negative impact / O = opportunity / R = risk.

(1) These "entity-specific" issues for Blue and Bolloré Energy will be covered by the Environment section of the sustainability report.

The resilience of the Bolloré Group's strategy and business model enables it to cope with material impacts and risks and to seize opportunities, in particular IROs linked to the challenges of climate change and the circular economy.

**Bolloré Energy** is a key player in oil distribution and oil logistics in France, Switzerland and Germany. Bolloré Energy is also a player in the consolidation of the oil products distribution sector in France and is also continuing to invest in its network of service stations in Germany. Climate change and the energy transition are causing a structural decline in the oil distribution market. As a result, Bolloré Energy has, since 2018, been pursuing a strategy of diversifying into the storage of petroleum products and is continuing to invest in the development of alternative fuels such as biodiesel (B100), synthetic diesel (HVO) and bio fuel oil containing 30% biofuel, which allows it to reduce its carbon footprint.

**Bolloré Innovative Thin Films** is continuing to develop new high-tech products, particularly in recyclable ultra-thin retractable packaging films, which is enabling it to continue growing its commercial activities internationally. As part of this commercial strategy, it is also continuing to make industrial investments, within its capacities, in order to increase the proportion of films it produces with higher added value. To address the challenge of reducing the use of plastic materials at source and "fair" packaging, Bolloré Innovative Thin Films uses ultra-thin technologies with complete control over the latest generation processes and resins. The films that it develops are increasingly thin in order to use the smallest possible amount of

raw materials. Thanks to its use of biosourced and recovered materials, the carbon footprint of its products is continuously improving.

The Group has made **Blue Solutions'** activities a major priority for development, contributing to the energy transition, thanks in particular to its innovative "solid-state" batteries, which are based on proprietary Lithium Metal Polymer (LMP®) technology, and whose commercial applications currently cover 6-meter and 12-meter fully electric buses. Since 2022, the Group has been stepping up its R&D efforts through strategic collaboration agreements with university laboratories in France and Switzerland in order to develop a new battery (Gen4) that can be used in the electric automotive industry. Blue Solutions is working with automotive manufacturers and suppliers to fine-tune technical developments and ensure that Blue's technology directly addresses the needs of their upcoming electric vehicle platforms.

Within **Systems'** business activities, the Smart Mobility division offers a range of solutions to build the city of tomorrow. Smart City Platform is a SaaS (Software as a Service) platform that concentrates and aggregates data from mobility operators and city infrastructures. It is based on artificial intelligence and gives cities an innovative solution to supervise and regulate mobility services and parking infrastructures in real time via three modules: Mobility Manager, Curb Manager and Smart Patrol. This solution is a digital intermediation response that contributes to optimizing urban mobility and managing the public space of towns and large cities.

#### 1.4.12. REPORTING REQUIREMENT FOR ESRS COVERED BY THE COMPANY'S SUSTAINABILITY STATEMENT (IRO-2)

The disclosure requirements covered in the sustainability report have been identified based on the valid results of the double-materiality assessment. The list of the main information published in the sustainability report and its position in the report is available in part 5. Appendices.

### 1.5. Methodological note on ESG reporting (basis for preparing the sustainability report [(BP-1; BP-2)])

#### Frame of reference

In accordance with the provisions of decree no. 2023-1934 of December 30, 2023, the purpose of which is to apply ordinance no. 2023-1142 of December 6, 2023 to the publication of non-financial information by certain large companies, as well as the AMF's recommendations concerning the corporate social responsibility information to be published by companies, the reporting of extra-financial indicators is based on an internal reference framework drawn up by the Bolloré Group's CSR and HR teams. This reference framework was fully updated in 2024 to factor in the results of the Group's DMA and the metrics required under the CSRD.

The Group has completely revised its ESG reporting protocol and defined the significant indicators for the IROs identified as being material, and in line with Efrag's lists of indicators.

This protocol is distributed and applied to all entities that gather and communicate their extra-financial information to the Group. It was fully updated in 2024 as part of the implementation of the CSRD. This document details the ESG reporting challenges, describes the respective roles and responsibilities of the system administrators, level 1 and level 2 approvers, and contributors as well as the precise organization of the campaign. It is also archived and made available to all contributors so that they can consult it at any time using the IT reporting system.

The principles set out in the environmental protocol are consistent with the IFRS guidelines, ISO 26000 and the Global Reporting Initiative (GRI).

#### 1.5.1. THE ESG REPORTING SCOPE

As announced in the introduction to this report, and as a reminder, during the 2024 fiscal year, the shareholders at Vivendi's General Meeting voted in favor of demerging the group in line with its activities. As a result of this demerger, the Bolloré Group lost control of Vivendi, resulting in a significant change in Bolloré SE's scope of consolidation between January 1 and December 31, 2024.

Under the ESRS, the scope of the sustainability report is identical to the company's financial reporting scope at the end of the fiscal year. In particular, the double-materiality assessment has been carried out on the scope of the new Group, i.e. excluding the Communications activities of the Vivendi group, the demerger of which completed in December 2024. As a result, at December 31, 2024, the Bolloré Group comprised Blue Solutions, Bolloré Energy, Innovative Thin Films, IER and Automatic Systems, all of which are wholly owned and consolidated by Bolloré, together with certain

non-consolidated minority interests in entertainment, media and agribusiness groups. Quantitative data points are also provided for the entities within the new Group, diverging in this respect from the ESRS rules, which require certain quantitative data points to be provided for the entire reporting period. However, the Group considered that this was the most appropriate and meaningful means of reflecting the true position of the Bolloré Group's activities at December 31, 2024.

The Bolloré Group's reporting scope also includes the legal entities of Compagnie de l'Odét, the umbrella holding company. Compagnie de l'Odét's entities are: Compagnie de l'Odét, Société des Éditions du Point du Jour and Compagnie de l'Étoile des Mers. They represent only 19 people out of the 3,185 employees in the Bolloré Group. The impact of the consolidation of these three legal entities represents less than 0.006% of the workforce and less than 0.0004% of the Bolloré Group's scope 1 and 2 greenhouse gas emissions.

#### 1.5.2. INFORMATION ON EMPLOYMENT INDICATORS AND THE PUBLICATION OF INFORMATION ON SPECIFIC CIRCUMSTANCES (BP-2)

##### 1.5.2.1. SCOPE OF EMPLOYMENT DATA

The scope of employment data. This scope covers 100% of the Group's workforce and 100% of its revenue. The data is collected in January of the following year for the period between January 1 and December 31.

##### 1.5.2.2. ORGANIZATION

The following indicators have been compiled and consolidated using the Enablon software for all Group activities, with the exception of certain specific indicators which are compiled directly at Group level.

##### 1.5.2.3. INDICATORS

For this transition year, the Bolloré Group chose not to include voluntary or "phased-in" data, in line with the flexibility permitted under the CSRD.

The employment reporting questionnaire is divided into four main sections:

- own workforce, contracts, diversity and inclusion;
- staff movements;
- working conditions and social dialog;
- employees' health and safety.

All entities within the employment reporting scope are required to complete the entire questionnaire, subject to specific exceptions:

- entities that fall within the reporting scope during the fiscal year are only required to provide data relating to their workforce. Other data will be provided in the report for the following year (N+1).

## WORKFORCE

Data about the workforce is provided in terms of the number of employees at December 31, 2024.

Work-study contracts (apprenticeship and professional training contracts) are counted as fixed-term contracts, while trainees are not included in the workforce.

## STAFF MOVEMENTS

Staff departures at December 31, 2024 are accounted for in the report for the following year (N+1).

## TURNOVER RATE

In order to comply with the requirements under the CSRD, the Bolloré Group publishes the employee turnover rate over the reference period. This rate is calculated based on the number of employees on permanent contracts who left their jobs during the reference period (resignations, terminations by mutual agreement, redundancies, retirements or deaths in service), as a proportion of the total number of employees on permanent contracts at the end of the previous year (N-1).

## HEALTH AND SAFETY

The workplace accident frequency rate is calculated using the following formula:

$$\frac{\text{Number of workplace accidents with lost-time} \times 1,000,000}{\text{Total hours worked}}$$

- The calculation of actual annual hours worked uses theoretical annual working hours, adjusted for days of absence.

- The percentage of the workforce covered by the health and safety management system is published based on the workforce on December 31, 2024 (excluding new entities integrated in 2024).
- The number of fatalities reported includes both employee fatalities and fatalities of external on-site workers caused by workplace accidents or occupational illnesses.  
Note that none of the social indicators presented in this report have been the object of a specific estimate.

## 1.5.3. INFORMATION ON ENVIRONMENTAL INDICATORS AND THE PUBLICATION OF INFORMATION ON SPECIFIC CIRCUMSTANCES (BP-2)

### 1.5.3.1. SCOPE OF ENVIRONMENTAL DATA

Historically, the reporting scope only covered entities with a workforce of 20 or more, revenue greater than or equal to 10,000 euros, and that have been in existence for at least one year (i.e., with one full accounting year completed as at December 31).

Legal entities sharing the same physical site were identified through an in-depth review of all our legal entities and their sites, thereby avoiding any double counting.

This allowed us to increase the number of entities covered from 17 in 2023 to 40 in 2024, covering 99.9% of the Group's total workforce in 2024.

Four Group entities have been exempted as a result of being non-material, for example due to empty offices (Immobilière Mount Vernon, Sorebol UK Ltd), an empty showroom (Blue LA Inc.) and agricultural land considered as non-representative and non-material for the Group's activities (Immobilière de la Brardière).

The impact of these exemptions was estimated at 0.06% of the Bolloré Group's scope 1 and 2 emissions in 2024. The Bolloré Group will ensure that exemptions are used as little as possible in order to be aligned with the financial scope.

### 1.5.3.2. OTHER ESTIMATES

In relation to data on energy consumption, steam for heating and natural gas, the published quantities correspond to the quantities invoiced. Where data is not available (which is the case for certain sites not owned by the Group), consumption is estimated on the basis of ratios (kWh/m<sup>2</sup>, kWh/ft<sup>2</sup>, kWh/headcount). The ratios used for the energy consumption indicators are average values that differ according to the geographical location or the business of the entities and that are based on the Bolloré Group's data for year N-1, audited by an independent third-party body in connection with the annual publication of the extra-financial Performance Statement (EFPS).

For sites that rent their premises and do not have access to their electricity consumption data, electricity consumption is estimated based on the surface area occupied at the site and the average total electricity consumption for the year in question (electricity from renewable energy sources or not, and self-consumed electricity) at Group level, based on data collected via the reporting tool and audited by the auditors responsible for certifying sustainability information as part of the annual publication of the sustainability report. The estimated data is included in the consumption of electricity from non-renewable sources.

### 1.5.3.3. EXTRAPOLATIONS

Reported data cover a twelve-month period. If one or more invoices are missing at the time the report is drawn up, the contributors are required to extrapolate the data as follows:

- extrapolation is carried out by applying the percentage change between the known months in year N and the same months in year N-1, to the values of months N-1 corresponding to the missing months in year N;

- where the extrapolation method based on changes in consumption cannot be used (the data for year N-1 is incomplete or unavailable), the consumption for the missing months is extrapolated based on the average consumption for the known months in year N.

### 1.5.3.4. A FURTHER CLARIFICATION ON METHODOLOGY

The consumption of refrigerant gases, as currently reported, only includes refills made during the year as a result of leaks from facilities in operation. This does not include any potential releases of gas during the dismantling of facilities.

In terms of waste, the Bolloré Group only reports waste from its industrial activities. Waste from its office activities is not calculated. Although this office waste, which, for the most part, is non-hazardous, has a material environmental impact, it nevertheless remains an insignificant aspect of the Group's activities.

### 1.5.3.5. GREENHOUSE GAS EMISSION CALCULATIONS

#### Emission factors used

Greenhouse gas (GHG) emissions are calculated based on the emission factors set out in the French environment and energy management agency (Ademe)'s Empreinte database, version 23.2 dated December 20, 2023. Where emission factors in this database are not available or deemed irrelevant, other recognized sources such as the GHG Protocol ([www.ghgprotocol.org](http://www.ghgprotocol.org)), Defra ([www.gov.uk/government/publications/greenhouse-gas-reporting-conversion-factors-2022](http://www.gov.uk/government/publications/greenhouse-gas-reporting-conversion-factors-2022)), IEA ([www.iea.org](http://www.iea.org)), AIB ([www.aib-net.org](http://www.aib-net.org)) or the CaDI (Carbon Database Initiative) may be used.

GHG emissions associated with the upstream or downstream value chain are calculated using emission factors from indirect sources based on national averages.

Calculations of greenhouse gas emissions take into account the following seven gases: carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF<sub>6</sub>) and nitrogen trifluoride (NF<sub>3</sub>).

#### GHG emission categories

GHG emissions reported by the Group fall into three categories:

- scope 1 emissions represent direct GHG emissions. These include emissions linked to the consumption of natural gas and domestic fuel oil, and to the injection of refrigerants during maintenance operations on sites' air-conditioning systems. It also includes emissions related to transport from consumption from mobile sources for directly owned vehicles or vehicles on long-term leases and emissions related to consumption from fixed sources for generators, and in both cases, the equipment over which the Group has operational control;

- scope 2 covers indirect GHG emissions associated with electricity and steam consumption;
- scope 3 represents external indirect GHG emissions, including emissions linked to:
  - business travel (3.6) and employee commuting (3.7),
  - purchases of goods and services (3.1), by extracting accounting data covering all purchases of goods and services by the Group's divisions,
  - upstream energy (3.3),
  - fixed assets (3.2), by extracting accounting data covering all purchases of goods and services by the Group's divisions,
  - the treatment of waste, including hazardous and non-hazardous industrial waste (3.5),
  - upstream (3.4) and downstream freight (3.9),
  - upstream leased assets (3.8),
  - the use of products sold by the Group (3.11),
  - end-of-life products sold by the Group (3.12),
  - Bolloré SE's financial investments (3.15).

The Bolloré Group does not publish GHG emissions for the following scope 3 items because they are irrelevant or not material:

- transformation of intermediate goods (3.10), as intermediate goods are not transformed as part of the Group's industrial processes;
- downstream leasing (3.13), since none of the Group's businesses distributes physical or intangible products under leasing arrangements;
- franchises (3.14), as the Group does not have a franchise network.

Details of certain greenhouse gas emission calculations.

## SCOPE 2

#### GHG emissions from electricity consumption

- To bring the GHG emissions calculation methodology into line with best practices (GHG Protocol) for market-based scope 2 emissions, residual emission factors are used when they are available and compatible with the granularity of the primary data. For the time being, this only covers the countries covered by the work of the AIB and Carbon Footprint through the Carbon Disclosure Project (CDP) database.

- To align with international recommendations and to enable better management of its emissions, in addition to publishing "market-based" scope 2 emissions, the Bolloré Group also publishes "location-based" scope 2 emissions. For this calculation, the emission factors used are those published by the IEA, except for France (mainland and overseas) for which the Ademe emission factors are preferred.

## SCOPE 3

Scope 3 covers indirect emissions generated by the company's upstream and downstream value chains, in accordance with the GHG protocol and the methodologies described below.

To calculate item 3.1 – Goods and services purchased, the Bolloré Group based its calculations on extracted accounting data. As this data is consolidated by division without any details of the type of goods or services purchased, the Bolloré Group has selected the emission factors for purchasing categories made available by Ademe that most accurately represent its purchases. An average of these emission factors has been calculated and applied to the consolidated carrying amount. This estimate covers all the Group's divisions except Energy. For the Energy division, the calculation of 3.1 was based on the quantities of fuels sold (the most representative item for the division), and the upstream emission factors for the various petroleum products sold were applied to these quantities. It should be noted that item 3.1 – Goods and services purchased, which relates to the Energy division, represents more than 88% of the Bolloré Group's 3.1 – Goods and services purchased emissions. To calculate item 3.2 – Fixed assets, the Bolloré Group based its calculations on extracted accounting data. As this data is consolidated by division without any details of the type of fixed asset, the Bolloré Group selected the emission factors for purchasing categories made available by Ademe that most accurately represent its fixed assets. An average of these emission factors was calculated and applied to the consolidated carrying amount. This estimate covers all the Group's divisions.

To calculate items 3.4 – Upstream transport and distribution and 3.9 – Downstream transport, the Bolloré Group used extracted accounting data. As the detail of this information differs between divisions, different types of calculation were made. Where details were available for the different modes of transport, the Bolloré Group selected the appropriate emissions factor for purchasing categories made available by Ademe, and where the details were unavailable, an average of the emissions factors (air, sea and road) was applied to the monetary data or to the data in kilometers.

To calculate item 3.8 – Upstream leased assets, the Bolloré Group based its calculations on extracted accounting data. This item is only relevant to the Bolloré Energy division.

To calculate item 3.11 – Use of products sold, the Bolloré Group used the quantities of fuel sold to its customers for the Energy division. The combustion of petroleum products sold accounts for 99% of this item. The remaining 1% covers the use of batteries sold by the Blue division and the use of products sold by the Systems division.

To calculate item 3.12 – End-of-life products sold, the Bolloré Group used the quantities of plastic film sold to its customers for the Innovative Thin Films division, the recycling of batteries for the Blue division and end-of-life products sold by the Systems division.

To calculate item 3.15 – Investments, the Bolloré Group used the available revenue figures of the companies in which the Group holds shares. These revenue figures were applied to the Group's shareholding percentages and the emissions factor for purchasing categories provided by Ademe.

To calculate items 3.3 – Activities in the fuel and energy sectors, 3.5 – Waste generated by activities, 3.6 – Business travel and 3.7 – Employee commuting, the Bolloré Group used the data collected in its reporting tool.

## 2. Environmental information – Innovating in response to major environmental challenges

### 2.1. Analysis of the sustainability of the Bolloré Group's activities with regard to the European taxonomy

Under the European Union's Sustainable Finance Action Plan launched in 2018, European Regulation 2020/852 of June 18, 2020 (the Taxonomy Regulation) introduces a single classification to establish whether an economic activity is environmentally sustainable, the aim being to encourage sustainable investments and redirect capital flows to meet European requirements for reducing greenhouse gas emissions and achieving the climate neutrality target at European level by 2050.

An economic activity is said to be "sustainable", if it contributes substantially to one of the six environmental objectives of the Taxonomy Regulation, does not harm the other five objectives and respects minimum safeguards.

In accordance with this Regulation, for fiscal year 2021, the Bolloré Group was subject to the obligation to publish the share of revenue, capital expenditure (Capex) and operating expenses (Opex) of activities eligible under the two climate objectives. In 2022, the activities defined as eligible were subject to an assessment to determine whether they were aligned with the technical criteria for climate change adaptation and mitigation, whether they did not cause significant harm to the other five environmental objectives and whether they met minimum safeguards. On June 13, 2023, the European Commission published the Delegated Acts relating to the four other environmental objectives

(transition to a circular economy, pollution prevention and reduction, sustainable use and protection of aquatic and marine resources, protection and restoration of biodiversity and ecosystems). For fiscal year 2023, the disclosure requirements concerned the eligibility and alignment of activities in respect of the first two environmental objectives as well as eligibility in respect of the four new environmental objectives. From fiscal year 2024 onwards, the Bolloré Group is required to publish information on the eligibility and alignment of its activities with the six environmental objectives of the European taxonomy, in accordance with the delegated acts adopted in June 2023.

In addition, the Commission has made targeted amendments to the Delegated Acts on technical criteria (including the pollution DNSH criteria) and the climate component of the EU taxonomy to extend its scope to economic activities contributing to climate change mitigation or adaptation that had yet to be included, concerning in particular the manufacturing and transport sectors. The Bolloré Energy and Industry Divisions have been impacted by these changes. It should be noted that the Bolloré Group does not publish any taxonomy-related performance targets. The Group's strategy is to comply with the taxonomy while adopting a prudent approach.

#### 2.1.1. METHODOLOGICAL APPROACH

##### 2.1.1.1. IDENTIFICATION OF ELIGIBLE ACTIVITIES

The scope of the sustainability report, including the taxonomy report, is identical to the company's financial reporting scope. In accordance with IFRS 5, and to ensure the comparability of results, reclassifications as discontinued operations or assets held for sale include Vivendi's contribution for financial years 2023 and 2024, the Group having lost control of Vivendi within the meaning of IFRS 10 following the spin-off/distribution transactions carried out by the Vivendi group on December 13, 2024. As a reminder, the Group's Transport and Logistics businesses outside Africa (sold on February 29, 2024) were already reclassified as discontinued operations or assets held for sale in the 2023 financial statements.

To meet this reporting obligation, the Bolloré Group's CSR and Finance Departments organized meetings on taxonomy reporting for the fourth consecutive year, in association with the CSR and Finance Departments of each of the divisions and with the support of a specialized firm. The objectives of these meetings were to:

- raise awareness and train the teams on the principle of taxonomy reporting;
- identify eligible business segments within the meaning of the taxonomy;
- analyze existing accounting standards and the various levels of information (Group, division and entities);

- present the technical alignment criteria expected for the main business segments identified as being eligible.

The identification of eligible business segments was updated in 2023 and refined at the beginning of 2025 based on a methodological approach including a detailed analysis of the Group's activities in light of the changes made to the company's scope and the eligible economic activities described in the annex to the delegated climate and environment regulations, and reflecting the latest amendments to these texts.

The eligibility and alignment analysis was conducted at a granular operational level such that there is no risk of double counting within the same taxonomy objective. Activities potentially eligible for several taxonomy objectives have been specifically identified and are presented in the "Codes" column of the regulatory tables.

The main changes in 2024 were regulatory in nature and relate to changes in the pollution DNSH (Do No Significant Harm) criteria, with the introduction of a new paragraph as well as analysis of the alignment of business activities with the objectives of transition to a circular economy, pollution prevention and reduction, sustainable use and protection of water and marine resources and protection and restoration of biodiversity and ecosystems.

It should be noted that no significant changes were made to the reporting methodology for taxonomic information between 2023 and 2024.

#### IN SUMMARY, THE FOLLOWING BOLLORÉ GROUP ACTIVITIES WERE CONSIDERED AS ELIGIBLE IN THE 2024 FISCAL YEAR

##### Within the Industry Division:

- under the Climate Change Mitigation objective, Blue is involved in bus manufacturing (CCM - 3.3 – Manufacture of low carbon technologies for transportation), battery manufacturing (CCM - 3.4 – manufacturing Battery) and the leasing of buses (CCM - 6.3 – Urban and suburban transport, road passenger transport). The CCM - 3.18 – Manufacture of automotive and mobility components activity has been transferred to the CCM - 3.3 activity defined above, which appears more appropriate this year;
- under the Circular economy objective, Bolloré Innovative Thin Films is involved in the manufacture of plastic films (CE - 1.1 – Manufacture of plastic packaging). In addition, the CCM - 3.17 – Manufacture of plastics in primary form activity has been transferred to the CE - 1.1 activity defined above, identified as being more appropriate;

- under the Circular Economy objective, Systems is involved in the business activities of Polyconseil, some of whose work relates to the circular economy (CE - 4.1 – Provision of data-based IT and operational solutions); the activities of Automatic Systems (CE - 1.2 – Manufacture of electrical and electronic equipment) and IER's activities in relation to electrical terminals (CCM - 3.20 – Manufacture, installation, and servicing of high, medium and low voltage electrical equipment for electrical transmission and distribution that result in or enable a substantial contribution to climate change mitigation).

**Within the Oil logistics Division:**

- only Bolloré Energy's capital expenditure (Capex) is eligible under the Climate Change Mitigation objective, through its fuel delivery activity (CCM - 6.6 – freight transport Road).

**The Group's other relevant assets under the Climate Change Mitigation objective, are as follows:**

- Tuticorin port terminal – India Port & Logistics Private LTD (CCM - 6.16 – Infrastructure for low-carbon transport);

- Fleet Management Services (CCM - 6.19 – Passenger and freight air transport).

**Two business activities common to all the divisions are affected by the Climate Change Mitigation and Circular Economy objectives:**

- building renovation activities (CCM - 7.2 and CE - 3.2 – Renovation of existing buildings);
- building acquisition and ownership activities (CCM - 7.7 – Acquisition and ownership buildings).

**IN SUMMARY, THE FOLLOWING BOLLORÉ GROUP ACTIVITIES WERE CONSIDERED AS NON-ELIGIBLE IN THE 2024 FISCAL YEAR:****Within the Industry Division:**

- Blue: following the inclusion of new activities in the scope of the regulation and a new interpretation of eligibility during the review of the analysis in 2024, the following activities are ultimately ineligible:
  - Manufacture, installation, and servicing of high, medium and low voltage electrical equipment (CCM - 3.20), Electricity storage (CCM - 4.10), Close to market research, development and innovation (CCM - 9.1) and freight transport Road (CCM - 6.6) are not relevant to Blue's activities;
- Bolloré Innovative Thin Films: the production of dielectric films and regranulated materials, the manufacture and trading of metallic films are not eligible;
- Systems: for Polyconseil, digital consultancy on matters unrelated to the circular economy is not eligible, nor is Close to market research, development and innovation (CCM - 9.1).

**Within the Oil logistics Division:**

- Bolloré Energy: under the European taxonomy, revenue from the transport of fossil fuels and biofuels is not eligible. Specifically for Bolloré Energy, revenue from its Freight Transport business (CCM - 6.6) is not eligible, as the delivery of the petroleum products sold by Bolloré Energy is included in their sale price. The Installation, maintenance and repair of renewable energy technologies (CCM - 7.6) and Professional services related to energy performance of buildings (CCM - 9.3) activities are no longer eligible, as the business closed in 2024.

**For the Group's other assets:**

- Freight forwarding, the operation of cinemas and agricultural activities are not eligible.

**2.1.1.2. FINANCIAL INFORMATION**

The identification work carried out as at December 31, 2024 focused on the three key performance indicators (KPIs) defined below:

Indicator	Revenue	Capex	Opex
<b>Denominator</b>	"Total taxonomy revenue": total revenue shown in the Group's financial statements	"Total taxonomy Capex": increase in the gross value on the balance sheet of right of use lease assets (IFRS 16), property, plant and equipment (IAS 16), and intangible assets (IAS 38) including business combinations	"Total taxonomy Opex": direct unfunded costs related to the maintenance and repair of property, plant and equipment, building renovation, research and development and short-term leases
<b>Numerator (eligible and aligned portion)</b>	Share of denominator associated with eligible and aligned economic activities	Share of the denominator associated with: <ol style="list-style-type: none"> <li>1. assets (or processes) associated with aligned activities</li> <li>2. a Capex/Opex plan aimed at increasing the share of eligible and aligned revenue</li> <li>3. assets or expenses individually eligible and aligned with the taxonomy</li> </ol>	

The data comes from:

- revenue, equal to that reported in the consolidated financial statements, directly from the consolidated financial statements;
- total Capex and Opex: detailed consolidated financial data used for the Bolloré Group's 2024 consolidated financial statements;

- figures relating to eligible and aligned portions: financial data from each business line's IFRS financial reporting.

It should be noted that, in 2024, there was no strategic investment plan with a material impact on taxonomic reporting, nor any restatement in respect of previous years.



## 2.1.2. APPLICATION OF THE TAXONOMY REGULATION TO THE BOLLORÉ GROUP'S ACTIVITIES

### 2.1.2.1. BREAKDOWN OF REVENUE FOR THE 2024 FISCAL YEAR

ObjectiveTaxonomy activity			2024		2023	
			Aligned revenue (in millions of euros)	% revenue	Aligned revenue (in millions of euros)	% revenue
A.1. Activities eligible for the taxonomy						
Circular economy	4.1	Provision of data-based IT/operational solutions	1	0%	0	0%
CC mitigation	3.3	Manufacture of low-carbon technologies for transportation	0	0%	10	0%
Total aligned with the taxonomy			1	0%	10	0%
A.2. Activity eligible for the taxonomy but not aligned						
CC mitigation	3.20	Manufacture, installation, and servicing of high, medium and low voltage electrical equipment for electrical transmission and distribution that result in or enable a substantial contribution to climate change mitigation	1	0%	0	0%
Circular economy	1.2	Manufacture of electrical and electronic equipment	104	3%	0	0%
Circular economy	4.1	Provision of data-based IT/operational solutions	0	0%	15	0%
CC mitigation	3.3	Low-carbon technologies for transportation	51	2%	0	0%
CC mitigation	6.3	Urban and suburban transport, road passenger transport	3	0%	0	0%
Circular economy	1.1	Manufacture of plastic packaging	72	2%	75	2%
CC mitigation	4.10	Electricity storage	0	0%	14	0%
CC mitigation	3.4	Battery manufacturing	0	0%	8	0%
CC mitigation	7.7	Acquisition and ownership of buildings	8	0%	0	0%
CC mitigation	6.16	Infrastructure for low-carbon transport	22	1%	0	0%
CC mitigation	6.19	Passenger and freight air transport	2	0%	0	0%
Total activities eligible for the taxonomy but not aligned			263	8%	112	4%
B. Activities not eligible for the taxonomy			2,866	92%	3,052	96%
TOTAL REVENUE – BOLLORÉ GROUP (EXCLUDING VIVENDI AND BOLLORÉ LOGISTICS)			3,130 <sup>(1)</sup>	100% <sup>(1)</sup>	3,174	100%

CC: climate change.

(1) See in this universal registration document, chapter 5 of the financial report (Analysis of operations and financial statements), section 5.1. – Consolidated financial statements.

The revenue of the Bolloré Group as at December 31, 2024 amounted to 3,130 million euros. The work that was carried out identified that 8% of 2024 revenue was eligible but not aligned.

The increase in eligible revenue from 4% in 2023 to 8% in 2024 is mainly due to the inclusion of the following activities:

- CE - 1.2 "Manufacture of electrical and electronic equipment", a new activity included following an in-depth analysis of activities in 2024;
- CCM - 6.16 "Infrastructure for low-carbon transport", an activity not included in the 2023 taxonomic reporting due to a planned sale. As the latter did not take place in 2024, this activity was reintegrated into the 2024 taxonomic reporting.

Only 1 million euros of revenue were eligible and aligned with the European taxonomy's objectives.

By way of comparison, the Bolloré Group's consolidated revenue in 2023 was 3,174 million euros (revenue as at December 31, 2023 excluding Vivendi and Bolloré Logistics). The work carried out in 2023 identified that 0.3% of consolidated revenue was eligible and aligned, and 4% of revenue was eligible but not aligned.

**2.1.2.2. BREAKDOWN OF CAPITAL EXPENDITURE (CAPEX) FOR THE 2024 FISCAL YEAR**

ObjectiveTaxonomy activity			2024		2023	
			Aligned Capex (in millions of euros)	% Capex	Aligned Capex (in millions of euros)	% Capex
A.1. Activities eligible for the taxonomy						
CC mitigation	3.3	Low-carbon technologies for transportation	0	0%	4	10%
Total aligned with the taxonomy			0	0%	4	10%
A.2. Activity eligible for the taxonomy but not aligned						
CC mitigation	7.7	Acquisition and ownership of buildings	1	2%	0	0%
CC mitigation	6.16	Infrastructure for low-carbon transport	0	1%	0	0%
CC mitigation	6.19	Passenger and freight air transport	0	0%	0	0%
Circular economy	1.2	Manufacture of electrical and electronic equipment	0	1%	0	0%
CC mitigation	3.4	Battery manufacturing	8	16%	8	18%
CC mitigation	3.3	Low-carbon technologies for transportation	0	0%	0	0%
CC mitigation	6.3	Urban and suburban transport, road passenger transport	3	5%	0	0%
CC mitigation	6.6	Road freight transport	3	5%	4	10%
CC mitigation	7.3	Installation, maintenance and repair of energy-efficient equipment	0	0%	0	0%
Circular economy	1.1	Manufacture of plastic packaging	6	12%	4	9%
Circular economy	4.1	Provision of data-based IT/operational solutions	0	0%	1	3%
Total activities eligible for the taxonomy but not aligned			20.4	43%	17	39%
B. Activities not eligible for the taxonomy			27	57%	22	51%
TOTAL CAPEX – BOLLORÉ GROUP (EXCLUDING VIVENDI AND BOLLORÉ LOGISTICS)			47.8	100%	42.9	100%

CC: climate change.

The Bolloré Group reported Capex of 47.8 million euros as at December 31, 2024. The analysis carried out identified that no activity was aligned and that 43% of Capex, representing 20.4 million euros, was eligible but not aligned with the European taxonomy's environmental objectives. Note that the Capex presented in this taxonomic reporting should be reconciled with the table of changes in fixed assets that appears in the appendices to the consolidated accounts (Chapter 5, note 6) but does not include Vivendi flows, which mainly explains the difference with the Capex presented in the taxonomic reporting. By way of comparison, the Bolloré Group's consolidated taxonomy Capex as at December 31, 2023 was 42.9 million euros (data as at December 31, 2023 excluding Vivendi and Bolloré Logistics). The work carried out in 2023 identified that 39% of the Bolloré Group's Capex was eligible but not aligned and 10% of eligible Capex was aligned with climate change mitigation and adaptation objectives.

The change in aligned Capex between 2023 and 2024 reflects the cautious approach taken by the Group in 2024, particularly with regard to the pollution DNSH criteria. Indeed, for taxonomy activity 3.3, the volume of documentation to be produced for the pollution DNSH criteria was considered to be unreasonable in light of the associated financial metrics.

In summary, the difference between the eligibility rates of revenue and Capex (8% and 43%, respectively) and the alignment rates (0% for both indicators) can be explained by substantial contribution criteria that were demanding or complex to demonstrate in 2024 (CE - 1.1 and CE - 1.2), by a generic "DNSH" criterion for pollution that is open to interpretation and in relation to which the Group took a cautious approach (CCM - 3.3) and by a very restrictive "DNSH Pollution" criterion specific to the CCM - 3.4 activity in relation to the circular economy.

**2.1.2.3. BREAKDOWN OF OPERATING INVESTMENTS (OPEX) FOR THE 2024 FISCAL YEAR**

In fiscal 2024, operating expenses (Opex), as defined by the Taxonomy, represented 78 million euros, i.e. 2% of the Bolloré Group's total consolidated operating expenses. Given the expense items covered (the sum of unfunded research and development costs, building renovation costs, short-

term leases and asset maintenance and repair costs), this indicator is not material in relation to the Group's activities and no eligibility or alignment analysis has been carried out.

**2.1.2.4. COMPLIANCE WITH TECHNICAL EXAMINATION CRITERIA**

At various workshops, the CSR and Finance Departments of each of the divisions determined the substantial contribution to the six objectives of the taxonomy for each activity identified as eligible and took stock of the existing policies and assessment processes that meet the DNSH criteria.

**SUBSTANTIAL CONTRIBUTION CRITERIA**

As stated above, some of Polyconseil's assignments (Industry Division) are eligible and meet the criteria for a substantial contribution of the CE - 4.1 activity: "Provision of data-based IT/operational solutions" of the taxonomy (Circular Economy objective). In fact, services corresponding to traceability were provided in 2024. In particular, the purpose of these assignments was

the monitoring and tracing of waste and pollutants in the context of regulatory declarations, in accordance with criterion 3.a of substantial contribution. In this sense, these projects contribute substantially to activity 4.1 of the Circular Economy objective of the taxonomy.

**DO NO SIGNIFICANT HARM PRINCIPLE (DNSH)****• 1. Climate change adaptation**

The Bolloré Group has assessed the exposure of all its eligible activities to physical climate risks according to two global warming scenarios (RCP8.5 and RCP2.6 of the IPCC) by 2030 and 2050, which did not reveal any absolute exposure to physical risks at Polyconseil (CE - 4.1). The Bolloré Group has therefore responded to the DNSH adaptation for its aligned activity.

**• 2. Sustainable use and protection of water and marine resources**

As a consultancy firm in Europe, Polyconseil does not carry on any activities that have a direct impact on the use or protection of water and marine resources. Consequently, it does not present any risk of breaching the Do No Significant Harm criterion under this objective of the European taxonomy.

**• 4. Pollution prevention and reduction**

As a consulting firm in Europe, Polyconseil complies with EU Directive 2009/125/EC on enterprise servers and data storage products, as well as substances subject to limitations targeted in annex 2 of EU Directive 2011/65/EU. It does not therefore present a risk of non-compliance with the Do No Significant Harm (DNSH) criterion of the EU Taxonomy Regulation with regard to the CE - 4.1 activity : "Provision of data-based IT/operational solutions". Under activity CE - 4.1 of the Taxonomy Regulation, no pre-conditions are required regarding the analysis of the DNSH criteria for transition to a circular economy and protection and restoration of biodiversity and ecosystems.

**2.1.2.5. COMPLIANCE WITH MINIMUM SAFEGUARDS**

As part of taxonomy reporting, the Group's compliance with minimum safeguards is based on the analysis and verification of the reasonable care process implemented to prevent, address and remedy human rights violations committed in connection with its own operations or activities that are part of its value chain.

The four key topics listed in the OECD guidelines, namely: bribery/corruption, human rights including workers' rights, fair competition, and taxation, have been targeted in the compliance analysis. The items mentioned in various international standards were summarized in an analysis grid to verify the Bolloré Group's compliance with each of the points required under the Taxonomy Regulation.

The analysis shows that the ethical measures implemented by the Group comply with the criteria set in the most stringent standards (duty of care law, Sapin II law, etc.):

- human rights: the Group has established duty of care processes based on a process of mapping and identifying human rights issues (see in this sustainability report, chapter 3 – Promoting human rights in our value chain);
- fair competition: the rules of competition law defined by States, the European Union and all international organizations apply to all Bolloré Group companies. Compliance with competition rules is enshrined in the

Group's Code of Conduct and applies to all its employees and partners (see in this sustainability report, chapter 4 – Sharing the same business ethics and ensuring compliance with the strictest standards);

- anticorruption programs: the Group's commitment is reflected in its zero tolerance policy for corruption risk (see in this sustainability report, chapter 4 – Sharing the same business ethics and ensuring compliance with the strictest standards);
- taxation: to ensure compliance with the tax rules applicable in the countries in which the Group operates, legal and tax teams are deployed centrally and locally to monitor the conduct required to comply with these rules. Compliance with these rules is set out in the Group's Code of Conduct to raise the awareness of all employees and business partners (see "Combating tax evasion" in the Code of Conduct available on the Bolloré Group website).

In accordance with these values and principles, all the Group's executives and employees must maintain transparent and constructive relationships with the tax authorities in the jurisdictions in which the Group operates. In this regard, in April 2025, Bolloré SE joined the French tax authorities' "trusted relationship" corporate partnership service.

## 2.1.2.6. DETAILS OF KEY PERFORMANCE INDICATORS – REGULATORY TABLES

## 2024 revenues

Fiscal year (in millions of euros)		2024	Substantial contribution criteria Criteria for the absence of significant harm (DNSH – Do No Significant Harm)																
Economic activities <sup>(1)</sup>	Code(s) <sup>(2)</sup>	Absolute revenue <sup>(3)</sup>	Share Group revenue <sup>(4)</sup>	Climate change mitigation <sup>(5)</sup>	Climate change adaptation <sup>(6)</sup>	Water and marine resources <sup>(7)</sup>	Circular economy <sup>(8)</sup>	Pollution <sup>(9)</sup>	Biodiversity and ecosystems <sup>(10)</sup>	Climate change mitigation <sup>(11)</sup>	Climate change adaptation <sup>(12)</sup>	Water and marine resources <sup>(13)</sup>	Circular economy <sup>(14)</sup>	Pollution <sup>(15)</sup>	Biodiversity and ecosystems <sup>(16)</sup>	Minimum safeguards <sup>(17)</sup>	Share of revenue aligned (A.1.) or eligible (A.2.) for the taxonomy, year N-1 <sup>(18)</sup>	Category (enabling activity) <sup>(19)</sup>	Category (transitional activity) <sup>(20)</sup>
				Y; N ; N/EL	Y; N ; N/EL	Y; N ; N/EL	Y; N ; N/EL	Y; N ; N/EL	Y; N ; N/EL	Y; N ; N/EL	Y; N ; N/EL	Y; N ; N/EL	Y; N ; N/EL	Y; N ; N/EL	Y; N ; N/EL	Y; N ; N/EL	Y; N ; N/EL	Y; N ; N/EL	%
A. ACTIVITIES ELIGIBLE FOR THE TAXONOMY																			
A.1. Environmentally-sustainable activities (aligned with the taxonomy)																			
Provision of data-based IT/operational solutions	CE - 4.1	1	0	N/EL	N/EL	N/EL	Y	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0	H	
Manufacture of low-carbon technologies for transportation	CCM - 3.3	0	0	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	N	Y	Y	0	H	
Revenue from environmentally sustainable activities (A.1.)		1	0	0%	0%	0%	0%	0%	0%	Y	Y	Y	Y	Y	Y	Y	0		
of which enabling		1	0	0%	0%	0%	0%	0%	0%	Y	Y	Y	Y	Y	Y	Y	0	H	
of which transitional		0	0							Y	Y	Y	Y	Y	Y	Y	0		T
A.2. Activities eligible for the taxonomy but not environmentally sustainable (not aligned with the taxonomy)																			
Manufacture, installation, and servicing of high, medium and low voltage electrical equipment for electrical transmission and distribution that result in or enable a substantial contribution to climate change mitigation	CCM – 3.20	1	0	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0		
Manufacture of electrical and electronic equipment	CE – 1.2	104	3	N/EL	N/EL	N/EL	EL	N/EL	N/EL								0		
Provision of data-based IT/operational solutions	CE – 4.1	0	0	N/EL	N/EL	N/EL	EL	N/EL	N/EL								0		
Manufacture of low-carbon technologies for transportation	CCM – 3.3	51	2	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0		
Urban and suburban transport, road passenger transport	CCM – 6.3	3	0	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0		
Manufacture of plastic packaging	CE – 1.1	72	2	N/EL	N/EL	N/EL	EL	N/EL	N/EL								2		
Electricity storage	CCM – 4.10	0	0	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0		
Battery manufacturing	CCM – 3.4	0	0	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0		
Acquisition and ownership of buildings	CCM – 7.7	8	0	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0		
Infrastructure enabling low-carbon road transport and public transport	CCM – 6.16	22	1	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0		
Passenger and freight air transport	CCM – 6.19	2	0	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0		
Revenue from activities eligible for the taxonomy but not environmentally sustainable (A.2.)		263	8	3%	0%	0%	6%	0%	0%										
Revenue from activities eligible for the taxonomy (A)		264	8	3%	0%	0%	6%	0%	0%								4		
B. ACTIVITIES NOT ELIGIBLE FOR THE TAXONOMY																			
Revenue from activities not eligible for the taxonomy		2,866	92																
TOTAL (A + B)		3,130	100																

Y: yes  
N: no  
N/EL: not eligible

## 2024 capital expenditure

Fiscal year (in millions of euros)		2024	Criteria for the absence of significant harm (DNSH – Do No Significant Harm)																	
Economic activities <sup>(1)</sup>	Code(s) <sup>(2)</sup>	Absolute investment expenses <sup>(3)</sup>	Proportion of investment expenses <sup>(4)</sup>																	
				Climate change mitigation <sup>(5)</sup>	Climate change adaptation <sup>(6)</sup>	Water and marine resources <sup>(7)</sup>	Circular economy <sup>(8)</sup>	Pollution <sup>(9)</sup>	Biodiversity and ecosystems <sup>(10)</sup>	Climate change mitigation <sup>(11)</sup>	Climate change adaptation <sup>(12)</sup>	Water and marine resources <sup>(13)</sup>	Circular economy <sup>(14)</sup>	Pollution <sup>(15)</sup>	Biodiversity and ecosystems <sup>(16)</sup>	Minimum safeguards <sup>(17)</sup>	Share of investment repenses aligned (A.1.) or eligible (A.2.) for the taxonomy, year N-1 <sup>(18)</sup>	Category (enabling activity) <sup>(19)</sup>	Category (transitional activity) <sup>(20)</sup>	
		Currency	%	Y; N ; N/EL	Y; N ; N/EL	Y; N ; N/EL	Y; N ; N/EL	Y; N ; N/EL	Y; N ; N/EL	Y; N	Y; N	Y; N	Y; N	Y; N	Y; N	Y; N	Y; N	%	H	T
A. ACTIVITIES ELIGIBLE FOR THE TAXONOMY																				
A.1. Environmentally-sustainable activities (aligned with the taxonomy)																				
Manufacture of low-carbon technologies for transportation	CCM – 3.3	0	0%	0	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	N	Y	Y	Y	10	H	
Capex of environmentally sustainable activities (A.1.)		0	0	0%	0%	0%	0%	0%	0%	Y	Y	Y	Y	Y	Y	Y	Y	10		
of which enabling		0	0	0%	0%	0%	0%	0%	0%	Y	Y	Y	Y	Y	Y	Y	Y	10	H	
of which transitional		0	0							Y	Y	Y	Y	Y	Y	Y	Y	0		T
A.2. Activities eligible for the taxonomy but not environmentally sustainable (not aligned with the taxonomy)																				
Acquisition and ownership of buildings	CCM – 7.7	1	2	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0			
Infrastructure enabling low-carbon road transport and passenger transport	CCM – 6.16	0	1	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0			
Passenger and freight air transport	CCM – 6.19	0	0	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0			
Manufacture of electrical and electronic equipment	CE – 1.2	0	1	N/EL	N/EL	N/EL	EL	N/EL	N/EL								0			
Battery manufacturing	CCM – 3.4	8	16	EL	N/EL	N/EL	N/EL	N/EL	N/EL								18			
Manufacture of low-carbon technologies for transportation	CCM – 3.3	0	0	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0			
Urban and suburban transport, road passenger transport	CCM – 6.3	3	5	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0			
Road freight transport	CCM – 6.6	3	5	EL	N/EL	N/EL	N/EL	N/EL	N/EL								10			
Installation, maintenance and repair of energy efficient equipment	CCM – 7.3	0	0	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0			
Manufacture of plastic packaging	CE – 1.1	6	12	N/EL	N/EL	N/EL	EL	N/EL	N/EL								9			
Provision of data-based IT/operational solutions	CE – 4.1	0	0	N/EL	N/EL	N/EL	EL	N/EL	N/EL								3			
Capital expenditure of activities eligible for the taxonomy but not environmentally sustainable (A.2.)		20	43	30%	0%	0%	13%	0%	0%								39			
Capital expenditure of activities eligible for the taxonomy (A)		20	43	30%	0%	0%	13%	0%	0%								49			
B. ACTIVITIES NOT ELIGIBLE FOR THE TAXONOMY																				
Capital expenditure of activities not eligible for the taxonomy		27	57																	
TOTAL (A + B)		48	100																	

Y: yes  
N: no  
N/EL: not eligible

Fiscal year	2024	Substantial contribution criteria	Criteria for the absence of significant harm (DNSH – Do No Significant Harm)
Economic activities <sup>(1)</sup>	Code(s) <sup>(2)</sup> Absolute operating expenses <sup>(3)</sup> Proportion of operating expenses <sup>(4)</sup> Climate change mitigation <sup>(5)</sup> Climate change adaptation <sup>(6)</sup> Water and marine resources <sup>(7)</sup> Circular economy <sup>(8)</sup> Pollution <sup>(9)</sup> Biodiversity and ecosystems <sup>(10)</sup> Climate change mitigation <sup>(11)</sup> Climate change adaptation <sup>(12)</sup> Water and marine resources <sup>(13)</sup> Circular economy <sup>(14)</sup> Pollution <sup>(15)</sup> Biodiversity and ecosystems <sup>(16)</sup> Minimum safeguards <sup>(17)</sup> Share of operating expenses aligned (A.1.) or eligible (A.2.) for the taxonomy, year N-1 <sup>(18)</sup> Category (enabling activity) <sup>(19)</sup> Category (transitional activity) <sup>(20)</sup>	Currency %	Y; N; N/EL Y; N; N/EL Y; N; N/EL Y; N; N/EL Y; N; N/EL Y; N; N/EL Y; N Y; N Y; N Y; N Y; N Y; N Y; N Y; N Y; N % H T
A. ACTIVITIES ELIGIBLE FOR THE TAXONOMY			
A.1. Environmentally-sustainable activities (aligned with the taxonomy)			
Operating expenses of environmentally-sustainable activities (A.1.)	0	0	0
of which enabling	0	0	0
of which transitional	0	0	0
A.2. Activities eligible for the taxonomy but not environmentally sustainable (not aligned with the taxonomy)			
Operating expenses of activities eligible for the taxonomy but not environmentally sustainable (A.2.)	0	0	0
Operating expenses of activities eligible for the taxonomy (A)	0	0	0
B. ACTIVITIES NOT ELIGIBLE FOR THE TAXONOMY			
Operating expenses of activities not eligible for the taxonomy	78	100	
TOTAL (A + B)	78	100	

Y: yes  
 N: no  
 N/EL: not eligible



**Share of eligible revenue, capital expenditure and operating expenses aligned with the taxonomy, by objective**

(as a percentage)	Share of revenue/ (absolute revenue)	
	Aligned	Eligible
Climate change mitigation <sup>(5)</sup>	0	3
Climate change adaptation <sup>(6)</sup>	0	0
Water and marine resources <sup>(7)</sup>	0	0
Circular economy <sup>(8)</sup>	0	6
Pollution <sup>(9)</sup>	0	0
Biodiversity and ecosystems <sup>(10)</sup>	0	0

(as a percentage)	Share of Capex/ (absolute Capex)	
	Aligned	Eligible
Climate change mitigation <sup>(5)</sup>	0	30
Climate change adaptation <sup>(6)</sup>	0	0
Water and marine resources <sup>(7)</sup>	0	0
Circular economy <sup>(8)</sup>	0	13
Pollution <sup>(9)</sup>	0	0
Biodiversity and ecosystems <sup>(10)</sup>	0	0

(as a percentage)	Share of Opex/ (absolute Opex)	
	Aligned	Eligible
Climate change mitigation <sup>(5)</sup>	0	0
Climate change adaptation <sup>(6)</sup>		0
Water and marine resources <sup>(7)</sup>	0	0
Circular economy <sup>(8)</sup>	0	0
Pollution <sup>(9)</sup>	0	0
Biodiversity and ecosystems <sup>(10)</sup>	0	0

## 2.2. Reducing the Group's carbon footprint and adapting to climate change (ESRS E1)

### 2.2.1. FROM IDENTIFICATION OF CLIMATE CHANGE RISKS AND OPPORTUNITIES TO FORMALIZATION OF ENVIRONMENTAL COMMITMENTS AND POLICIES (E1-2)

#### *The principal climate change-related impacts, risks and opportunities for the Bolloré Group*

Specific material issue	Impact/risk/opportunity	Description	Scope concerned
<b>Climate change adaptation</b>	Negative impact	Pollution caused by meteorological events: hydrocarbon spills with serious consequences for the environment as a result of the deterioration/destruction of Bolloré Energy's infrastructure (depots) or pipelines	Bolloré Energy
	Negative impact	Physical damage caused by meteorological events such as serious injury, death or a deterioration in local services as a result of damage to sites/plants in Brittany caused by extreme meteorological events	Blue and Bolloré Innovative Thin Films
	Financial risk	Increase in costs resulting from: – rising costs of rehabilitating infrastructure damaged by extreme weather events – carrying out adaptation work needed to ensure the resilience of sites and infrastructure to climate change (energy performance of buildings, protection against fire/flooding)	Blue and Bolloré Innovative Thin Films
	Opportunity	Financial opportunity linked to the adaptation of historic product ranges to products with lower carbon emissions (biodiesel from rapeseed, synthetic biofuel).	Bolloré Energy
<b>Climate change mitigation</b>	Negative impact	Contribution to the acceleration of climate change (irreversible) as a result of the combustion of fossil fuels	Bolloré Energy
	Negative impact	Contribution to greenhouse gas emissions (industrial activity related to the production of access equipment)	Systems
	Negative impact	Damage to health linked to an increase in emissions of fine particles from fuel combustion (e.g. respiratory and cardiovascular diseases)	Bolloré Energy
	Positive impact	Lower CO <sub>2</sub> emissions as a result of using electric vehicles rather than petrol/diesel vehicles	Blue and Bolloré Innovative Thin Films
	Positive impact	Energy efficiency measures through Systems' products and services: energy audits and energy efficiency assessments of buildings, eco-designed products and services, technologies, digitization of information	Systems
	Financial risk	Lower revenue due to: – transition risk: loss of markets as a result of stricter regulations on thermal boilers – new or existing regulatory requirements on limiting pollution levels from carbon-intensive modes of transport	Bolloré Energy
	Financial risk	Increase in costs resulting from: – additional costs linked to the use of carbon pricing instruments to reduce GHG emissions (carbon tax, carbon border adjustment mechanism) – rising commodity prices due to the scarcity of natural resources	Bolloré Energy
	Financial opportunity	Increase in revenue resulting from: – changes in regulations and public policies on promoting the development of electric vehicles – rising customer demand linked to a desire to reduce the carbon intensity of transport	Bolloré Blue and Bolloré Innovative Thin Films
<b>Energy</b>	Negative impact	Use of fossil fuels for the delivery truck fleet	Bolloré Energy
	Positive impact	Helping to improve the energy efficiency of Bolloré Energy's customers	Bolloré Energy
	Negative impact	Negative impact related to energy supplies used in the manufacture of electric buses (energy from non-renewable sources)	Blue and Bolloré Innovative Thin Films
	Positive impact	Energy efficiency measures through Systems' products and services: energy audits and energy efficiency assessments of buildings, eco-designed products and services, technologies, digitization of information	Systems
	Financial opportunity	Increase in revenue linked to the adaptation of historic product ranges to products with lower carbon emissions (biodiesel from rapeseed, synthetic biofuel)	Bolloré Energy
	Financial opportunity	Higher revenues as a result of increased demand for electric buses	Blue and Bolloré Innovative Thin Films

The Bolloré Group formalizes its commitment to tackling the upheavals of climate change in the Environment section of its Ethics & CSR Charter, signed by the Chairman and CEO, and accessible on the Group's website. This Charter enshrines the Group's commitments to adapt to climate change and to work to mitigate its carbon footprint through the implementation of strategies based

on mitigation and adaptation plans, as well as by taking into account issues relating to energy efficiency and the deployment of renewable energies. Carbon emission reduction targets have thus been formalized and approved at the highest level of the Group's governance and these are presented in the following paragraphs.

## 2.2.2. FACTORING CLIMATE ISSUES INTO GROUP STRATEGY AND CLIMATE GOVERNANCE (SBM-3/GOV-3)

The Bolloré Group historically identified that the challenges associated with climate change were priorities for all its activities. In 2024, the double materiality assessment went a step further and identified IROs by business activity, as described in the table above. The Bolloré Group accordingly fine-tuned its analysis of physical climate risks in order to continue strengthening the resilience approach incorporated into its business strategy (developed in more detail below).

### 2.2.2.1. THE RESILIENCE OF THE BOLLORÉ GROUP'S STRATEGY AND BUSINESS MODEL ENABLES IT TO COPE WITH MATERIAL IMPACTS AND RISKS AND TO SEIZE OPPORTUNITIES LINKED TO CLIMATE CHANGE AND THE CIRCULAR ECONOMY (SBM-3)

**Bolloré Energy** is a key player in oil distribution and oil logistics in France, Switzerland and Germany. Bolloré Energy is also a player in the consolidation of the oil products distribution sector in France and is also continuing to invest in its network of service stations in Germany. Climate change and the energy transition are causing a structural decline in the oil distribution market. As a result, Bolloré Energy has, since 2018, been pursuing a strategy of diversifying into the storage of petroleum products and is continuing to invest in the development of alternative fuels such as biodiesel (B100), synthetic diesel (HVO) and bio fuel oil containing 30% biofuel, which allows it to reduce its carbon footprint and make its business sustainable through revenue growth linked to its range of products with lower carbon emissions.

**Bolloré Innovative Thin Films** is continuing to develop new high-tech products, particularly in recyclable ultra-thin retractable packaging films, which is enabling it to continue growing its commercial activities internationally. As part of this commercial strategy, it is also continuing to make industrial investments, within its capacities, in order to increase the proportion of films it produces with higher added value. To address the challenge of reducing the use of plastic materials at source and "fair" packaging, Bolloré Innovative Thin Films uses ultra-thin technologies with complete control over the latest generation processes and resins. The films that it develops are increasingly thin in order to use the smallest possible amount of raw materials. Thanks to its use of biosourced and recovered materials, the carbon footprint of its products is continuously improving.

The Group has made **Blue Solutions'** activities a major priority for development, contributing to the energy transition, thanks in particular to its innovative "solid-state" batteries, which are based on proprietary Lithium Metal Polymer (LMP®) technology, and whose commercial applications currently cover 6-meter and 12-meter fully electric buses. Since 2022, the Group has been stepping up its R&D efforts through strategic collaboration agreements with university laboratories in France and Switzerland in order to develop a new battery (Gen4) that can be used in the electric automotive industry. Blue Solutions is working with automotive manufacturers and suppliers to fine-tune technical developments and ensure that Blue's technology directly addresses the needs of their upcoming electric vehicle platforms.

Within **Systems'** business activities, the Smart Mobility division offers a range of solutions to build the city of tomorrow. Smart City Platform is a SaaS (Software as a Service) platform that concentrates and aggregates data from mobility operators and city infrastructures. It is based on artificial intelligence and gives cities an innovative solution to supervise and regulate mobility services and parking infrastructures in real time via three modules: Mobility Manager, Curb Manager and Smart Patrol. This solution is a digital intermediation response that contributes to optimizing urban mobility and managing the public space of towns and large cities.

In respect of Group governance in the face of climate-related impacts, risks and opportunities: reporting to the Finance Department, the Bolloré Group's CSR Department coordinates the Group's overall CSR strategy, with the assistance of specialized committees, and through the Head of CSR's presence at the meetings of the Audit Committee, Executive Committee, Risk Committee,

and Ethics – CSR and Anticorruption Committee, presented in chapter 1 (ESRS 2) of this sustainability report.

At its meeting on March 14, 2023, the Board of Directors was invited to consider the changes made in the new version of the Code published in December 2022 aimed at ensuring that the Board of Directors integrates the CSR strategy in its duties. With regard to the creation of a dedicated CSR Committee, after reiterating that the Audit Committee reviews extra-financial risks as part of its current duties, the Board members decided that the Board of Directors will continue to refer to the work of the Audit Committee, whose responsibilities were extended to all CSR issues. Since 2023, as part of the implementation of this recommendation, meetings with independent directors have been held once or twice a year in addition to meetings of the Audit Committee, in order to continue providing training on CSR issues, particularly in 2024 on the action taken by the Group to comply with the CSRD. These training sessions are run by a firm of experts and attended by the Head of CSR.

The deployment of the strategy approved by the Board of Directors involves presentations on strategic directions to the Ethics-CSR and Anticorruption Committee, which is attended by the Chief Executive Officers of the Group and the subsidiaries. A CSR Steering Committee, led by the CSR Department, meets monthly in the presence of the subsidiaries' heads of CSR, HSE, Purchasing and HR to draw up action plans and ensure that the strategy is properly implemented.

In relation, more specifically, to the governance of climate issues, the Group committed in 2023 to communicating its greenhouse gas (GHG) emissions reduction targets and specifying the trajectory to meet the expectations of its stakeholders. Its carbon footprint was analyzed and its decarbonization levers were identified with the assistance of a firm of experts, involving the Group's CSR Department and the subsidiaries' heads of CSR/HSE, as well as their chief financial officers. A strategy, together with precise objectives, was defined and validated by the subsidiaries' Executive management teams, then by the Group's Audit Committee and endorsed by the Board of Directors, before being communicated in the 2023 Extra-financial performance statement, with a time horizon of 2030. As explained in the ESRS 2 chapter on CSR governance, the climate strategy was also validated prior to the meeting of the Audit Committee by the members of the Ethics, CSR and Anticorruption Committee, attended by managers from all the Group's support functions, the Group's Executive management team and the Chief Executive Officers of the Group's subsidiaries.

In addition, the analysis of the physical risks associated with climate issues initiated in 2022 and refined in 2024 is taken into account in the Bolloré Group's risk management processes in order to comply with the new European regulation concerning the classification of "sustainable" economic activities under the taxonomy, described in more detail below.

Since 2024, a CSR criterion linked to the Group's climate-related commitments has been included in the corporate officer's variable compensation (see chapter 4 – Corporate governance, paragraph 2.1. – Presentation of the compensation policy for corporate officers).

## 2.2.3. CLIMATE CHANGE ADAPTATION PLAN (IRO-1)

The Group has been analyzing its transition and physical risks since 2021 with a view to defining a climate strategy. The Bolloré Group has identified the challenges associated with climate change as priorities for all of its activities. The challenges raised by climate change concern the entire Group: the increase and intensification of extreme weather events are likely to significantly disrupt all the Group's operations. For this reason, the Bolloré Group has continued and refined its transition risk analysis in order to strengthen its resilience approach in its business strategy, as well as an analysis of physical risks, necessary for the formalization of adaptation plans.

The climate scenarios applied by the Bolloré Group are compatible with the climate assumptions applied in its financial statements (see in this universal registration document, chapter 5 – Analysis of operations and financial statements, section 5 – Consolidated financial statements).

The Bolloré Group's transition risks are shown in the table below:

	Type of risk	Description of the risk	Relevant divisions
<b>Transition risk and opportunity</b>	Impact of rising temperatures	The rise in temperatures by 2050 could lead to gradual market loss, and more specifically a decline in demand for heating, which would directly impact Bolloré Energy's fuel oil distribution operations.	Bolloré Energy
	Impact of carbon pricing on operations	The transition to renewable energy sources will lead to a decline in demand for oil products, which could affect the Oil logistics market over the long term. Like other logistics and oil distribution companies, Bolloré Energy sees this transition as an opportunity through the development of low-carbon liquid energy products such as biofuels and synthetic fuels. The gradual ramp-up of these alternative fuels is the result of the low-carbon strategies of Bolloré Energy's large corporate customers.	
	Regulatory impact	Regulatory impact laws are being strengthened, first to regulate and then to reduce high emission activities. Bolloré Energy's Oil logistics and fuel oil distribution activities are concerned by the strengthening of these specific regulations. – In France, since July 1, 2022, any heating or hot water production equipment to be installed in a building, including to replace existing equipment, must have a greenhouse gas emission level of less than 300 g CO <sub>2</sub> eq/kWh PCI. As such, it is no longer possible to install new boilers using traditional fuel oil, which represents a loss of market for Bolloré Energy. This is why Bolloré Energy is incorporating the challenge of diversifying its activities into its business strategy. However, it is still possible to maintain and repair existing devices for individuals who wish to keep their equipment. – The European Union has imposed a reduction in the sulfur content of domestic fuel oil from 2,000 ppm to 1,000 ppm (parts per million). Further cuts are to come to align this energy with road diesel, at 10 ppm by 2024. Domestic fuel oil can now include biomass fuel in its composition. These regulatory changes have led Bolloré Energy to diversify its product range and it has become a pioneer in biofuel oil distribution in France.	
<b>Transition opportunity</b>	Electrification of transport	The transportation sector, both individual and collective, is currently undergoing major transformation, particularly due to electrification trends. Blue Solutions, with its battery offering specifically for electric bus manufacturers, and Bluebus, an electric bus manufacturer, are positioned to benefit from the growth of this market.	Industry
	Development of a new mobility service line (see diversification from traditional companies)	Global mobility demand is growing rapidly and is expected to double by 2050. As transport already accounts for 25% of global energy-related emissions (AIE Global EV Outlook 2030), it is strategic to ensure sustainable mobility to achieve the Paris Agreement target. The solutions offered by Blue Systems (data aggregation and mobility management platform, passenger transport by electric shuttle, etc.) should enable the Group to benefit from the development of this fast-growing market for new mobility solutions.	

This transition risk analysis was carried out in 2018 with the assistance of a firm of experts and will be updated in 2025 in order to meet new regulatory requirements and to provide details on the different scenarios used, in accordance with current standards.

**Further information on physical risks is set out in the following sub-sections**

In 2021, the Bolloré Group began work on analyzing its exposure to 12 chronic and acute climate-related hazards, as classified by the European taxonomy. Covering all its activities, the study was based on the IPCC's RCP8.5 and RCP2.6 scenarios (both updated in the sixth report in 2021 and now entitled SSP5-8.5 and SSP1-2.6, respectively), for the 2030 and 2050 time horizons (the analysis for the medium-term time horizon of 2040 was not consolidated), and used a prediction tool developed by a consultancy firm (based on the work of climate science laboratories, research organizations and the IPCC). The scenarios defined by the IPCC are used to assess the potential physical risks associated with climate change. The two scenarios selected present diametrically opposed assumptions in respect of temperature increase: SSP1-2.6 envisages a temperature increase of no more than 1.4 °C

over the long term, i.e. by 2100. SSP5-8.5 is the most alarmist scenario, as it provides for an average temperature rise of up to 4.4 °C. In order to be as ambitious as possible, the Group therefore decided to adopt the SSP5-8.5 scenario. These climate-related hazards were modeled for all the Group's sites (offices and branches, warehouses, industrial sites and logistics sites) – a total of 350 sites divided into three categories (tertiary sites, industrial sites and logistics sites).

For all climate-related hazards, each site's exposure was determined by combining two components:

1. absolute exposure: comparison of the site's exposure at different time horizons compared to physical risk thresholds, and;
2. relative exposure: change in the site's exposure at different time horizons compared to the historical period.

For example, the "heat wave" hazard corresponds to the number of days a year with a "wet bulb temperature" greater than 30 °C, i.e. a temperature that makes working outside unbearable. It was considered that the level of risk exposure would be "very high" where this temperature was exceeded on more than ninety days a year.

This work analyzing the exposure of the sites was the first step in taking these issues into consideration. However, following the successive disposals of the transport and logistics activities in 2023 and 2024, whose sites accounted for 91% of the analysis and the vast majority of the most exposed sites, in 2024, the Bolloré Group reassessed the risks to its updated scope (Bolloré Energy, Bolloré Innovative Thin Films and Blue, and Systems) factoring in its new regulatory obligations under the CSRD. These three assessments

cover the entire value chain, broken down into three zones: upstream, own operations and downstream, as well as all stakeholders who may be directly or indirectly affected by the activities of the various entities.

The 2024 work described below therefore covers all climate-related risks and opportunities, i.e. physical risks and transition risks, as well as opportunities linked to climate change, in line with the European Sustainability Reporting Standards (ESRS).

### 2.2.3.1. COMPLETION OF THE 2024 PHYSICAL AND TRANSITION RISK ANALYSIS

The entire process was supervised, at workshops organized for the three divisions, by the divisions' heads of CSR and HSE and the Bolloré Holding Company's CSR team.

As an initial step, a set of risks and opportunities, covering physical and transitional risks, was developed for each of the three divisions. The guidelines on constructing the set of climate-related ROs are based on the Task Force on Climate-Related Financial Disclosures (TCFD)'s international reference framework. The second stage involved researching relevant climate ROs for the Bolloré Group based on a variety of sources (previous analysis, responses to rating agency questionnaires, benchmarks, sector-specific expertise of the consultancy firm, etc.).

After validating the set of risks and opportunities with the divisions, work was carried out on pre-rating those risks and opportunities. The pre-ratings were used to assess each risk on a scale of both severity and probability of occurrence. The severity scale used to rate risks and opportunities is aligned with the double materiality assessment carried out by each division.

In line with the requirements under the European Sustainability Reporting Standards (ESRS), the probability of occurrence rating was carried out based on two climate scenarios and three time horizons. Both climate scenarios are based on the Shared Socio-economic Pathways (SSPs) used by the IPCC, and constitute narratives on how socio-economic factors might change over the next century.

The two chosen SSPs were SSP1 and SSP5, corresponding respectively to the most optimistic scenario and the most pessimistic scenario. These narratives are associated with climate scenarios called Representative Concentration

Pathways (RCPs), which correspond to different levels of radiative forcing resulting in different levels of global warming. The two chosen RCPs were:

- RCP 2.6: global warming of around 2 °C. In our work, this RCP was associated with SSP1;
- RCP 8.5: global warming of around 4 °C. In our work, this RCP was associated with SSP5.

The two time horizons used for the medium and long term – 2030, and 2050 – are consistent with the Group's business activities. Also, the severity rating scale used refers only to the financial impact, making it possible to quantify the financial effects of the risks. The severity of the risks was rated independently of the scenarios and time horizons, the variability of which was taken into account in the rating of the occurrence. The occurrence was rated for each scenario and time horizon..

The results of this pre-rating exercise were shared with representatives from each division, including the IER Group, at specific workshops. The initial versions of the materiality matrices were presented to the participants. Their in-depth knowledge of the businesses and operations was used to identify any necessary adjustments, ensure that the results and associated justifications were reliable, and determine the most material ROs for the divisions, in order to select them for the list of consolidated ROs at Group level. These workshops were used to prioritize the most material climate risks and opportunities, with the aim of obtaining a set of consolidated risks and opportunities at Bolloré Group level, based on a weighting principle that factors in each division's revenue as a proportion of the Group's total revenue. The Group CSR team is responsible for organizing, updating and communicating this analysis, working closely with the divisions' heads of CSR and HSE.

### 2.2.3.2. DESCRIPTION OF IDENTIFIED PHYSICAL AND TRANSITION CLIMATE RISKS

Ultimately, as a result of the analysis, the Group identified 10 major risks, four of which relate to physical risks and six to transitional risks.

	Type of risk	Description of the risk	Divisions affected
<b>Physical risks</b>	Drought	Supply constraints on raw materials resulting in lower revenue	Bolloré Energy
	Water stress	Production standstills due to the unavailability of water resources, resulting in lower revenue	Systems
	Heat waves	Business disruption/standstills due to heat waves and extreme heat, resulting in lower revenue	Bolloré Energy, Systems and Blue
	Flooding	Business disruption and damage to facilities due to flooding, resulting in lower revenue and higher direct costs	Bolloré Energy, Systems and Blue
<b>Transition risks</b>	Market	Increase in prices and supply constraints of metallic raw materials	Systems and Blue
		Loss of value of petroleum product storage assets	Bolloré Energy
	Regulation	Strengthening of energy efficiency regulations	Systems and Blue
		Lower demand for fossil fuels due to taxation mechanisms on end consumers	Bolloré Energy
		Limitation of the product portfolio and decrease in demand due to regulatory constraints	Bolloré Energy, Systems and Blue
	Technology	Higher R&D expenditure to keep up with technological standards in the market	Systems and Blue

### 2.2.3.3. VULNERABILITY ANALYSIS AND ACTION PLANS

After identifying the physical risks associated with climate disruption using a prediction tool, which provides detailed analysis of physical and transitional climate-related risks and allows organizations to better understand and manage these issues, the Group decided to go a step further and determine the level of vulnerability of its sites. Although it provides detailed analysis, this tool can be viewed as macro in nature. To obtain more precise results

based on specific needs, data that is as detailed as possible needs to be used, and the analysis should be supplemented with sector-specific or local expertise. To that end, the team from the Group's CSR Department held meetings with the CSR and HSE officers in each of the divisions, which led to the following points being identified.

#### BOLLORÉ ENERGY

According to the analysis of its exposure to physical risks, it would appear that, by 2050, the Bolloré Energy division could be subject to the risks of flooding and heat and water stress, to a greater or lesser degree. These extreme weather events could damage or destroy the company's oil product storage infrastructure, resulting in potential oil spills with serious consequences for the environment.

The Strasbourg site has been identified as being exposed to this climate-related hazard of flooding. In order to gauge the site's vulnerability, the teams looked into whether such events had occurred in the past. In twenty-five years, the Strasbourg depot has never experienced this type of event. The natural flood risk prevention plan (PPRI or PPRNI) issued by the public authority does not include this site on the list of locations at risk, and does not offer any technical, legal or human remedies for dealing with such risk. However, Bolloré Energy is working closely with government departments so that it can adapt to any changes in prevention plans for areas close to its sites. As a result of this ongoing work, Bolloré Energy identified the Gerzat site as subject to the risk of flooding, even though it was not considered to be particularly at risk in the analysis carried out by the consultancy firm. Bolloré Energy reacted immediately by implementing a number of measures, such as reinforcing the anchoring of tanks to the ground, protecting fire protection systems and securing generators. Validated by France's regional environmental, planning and housing agency (DREAL), all these mechanisms both protect the facilities, equipment and safety systems and ensure that the site is autonomous in terms of electricity supplies.

The division is also seeking to diversify its storage capacities. In the event that the impact of the flooding is too severe and the above measures prove to be inadequate, Bolloré Energy has the capacity to supply its customers from nearby storage facilities.

Bolloré Energy is also subject to risks of heat stress, particularly at its Chasseneuil du Poitou and Gerzat sites. One of the recommended measures for dealing with this type of risk is carrying out a study on the resistance of buildings and products. However, since the buildings are made of masonry, i.e. built to a standard design without cladding, the subsidiary did not consider that it was necessary to carry out this type of study. It should be noted that the oil products stored by Bolloré Energy do not pose any danger as they have an auto-ignition temperature of above 250 °C. Bolloré Energy also adapts its employees' working hours to ensure that health and safety conditions continue to apply during periods of hot weather. While working days at the Bolloré Energy division's depots start at 7 a.m. and end at 5 p.m., the depot readjusts its activities at the hottest times year by adjusting its opening hours in favor of the least burdensome times.

The oil division also needs to remain vigilant to the risks of water stress, which could have an impact on river transport. Minimum flow analysis was carried out on the level of the Rhine, which concluded that, in the event of severe water stress, there was an average 15% reduction in the minimum flow. In this respect, Bolloré Energy is working on developing alternatives: a slower flowing Rhine would not prevent supplies being made to the depots in question (Mulhouse and Strasbourg), but it could reduce the rate of the volumes delivered. In this scenario, there are two possible solutions for supplies: the Strasbourg depot can be supplied directly by pipeline from Dunkirk, while the Mulhouse depot can be supplied by road. In addition, if these two depots become inoperable, Bolloré Energy could supply its customers from other depots nearby (Dijon, Hauconcourt and Saint Baussant) where the company has sufficient storage capacity.

#### BLUE AND BOLLORÉ INNOVATIVE THIN FILMS

For the Bolloré Group's industrial sites in Brittany, extreme weather events could damage plants by 2050, causing serious injury or even death. Neither the local books nor inquiries with local authorities have identified any past events of this type. Therefore, no alerts have yet been issued and no specific measures have yet been imposed to increase vigilance in this area. The "Bat Adapt" comparative analysis indicates a low level of risk, and the area is characterized as "cellars potentially prone to flooding". It should be noted that, although the site is located on a slope, the buildings are on the upper part of the slope beside the road. The areas to be protected, i.e. the relevant parts of the manufacturing process, are located on the upper floor of the building and are therefore removed from any potential risk of flooding. The main measures in place involve the management of rainwater through the annual maintenance of drains, since these measures are also important to the management of fire-related events in which the water used to extinguish the fire needs to be rapidly and effectively drained. These tasks are entrusted to a specific department that manages all utilities on the relevant site. An improvement was made in 2023: the drainage grates were modified (their design was altered) to maximize the absorption capacity of the gutters (again, for water used to extinguish fires). The fact that our business requires employees to be present 24 hours a day, 7 days a week, means that we can be alerted in real time and react quickly if such an incident occurs.

Research into flooding incidents was carried out for both storage sites, with no events being recorded for either site. These sites were recently constructed, with the first being built in 2008 and the second in 2020. They are very much not located in basins. It should be noted that these sites, which are the subject of regular internal audits, are well maintained. The water drainage systems have not revealed any issues with the drainage of rainwater. External maintenance is carried out by a person who comes twice a year to carry out a number of tasks, including cleaning gutters, if necessary. It should be noted that these two sites are storage platforms for unloading and loading vehicles, and are therefore above ground height (due to the truck loading docks, which are between 1.10 meters and 1.20 meters off the ground). The products are therefore stored well above the 0.4 meters of water line stated in the risk analysis. As a result of all these factors, the sites have not put in place any additional initiatives for this type of event, which is considered to be very rare, and no alerts have been issued to date.

The real estate and HSE departments have been made aware by the Group's CSR Department, and through the various workshops held over the past few months, that the sites need to adapt in order to be resilient to climate change in their management of general works linked to the energy performance of buildings, fire and flood protection, etc.



## SYSTEMS

The Systems division was identified as being potentially exposed to three different types of risk: flooding, heat stress and water stress.

It should first be reiterated that the Automatic Systems (AS) and IER divisions carry out assembly and storage activities, which do not therefore involve significant production lines or significant requirements for materials or components, such as water.

With regard to the risk of flooding, two sites appear to be exposed to risk: AS France, in particular its Persan site, and AS Canada.

AS France's premises were the subject of special attention following the flooding that occurred in 1993. Although AS France was not yet the tenant of the premises at the time, once the Group became aware of the facts, the risk was taken into account, notably through a study carried out to assess potential solutions. Cofferdams currently appear to be the most effective possible mechanism. However, this risk has not yet been deemed sufficiently high to warrant investment in such solutions.

Although the prediction tool identified that AS Canada might be exposed to the risk of flooding, on closer inspection the entity was not found to be located in a flood zone. As such, AS Canada is not required to carry out a study or implement any preventive measures.

AS Spain is in fact located in a flood zone, given it is situated in a river delta. But once again, given the particularly low risk of heavy rainfall in this region, no measures currently need to be put in place, apart from clearing leaves from the streets to avoid clogging the sewers, which is carried out by Barcelona city council.

In general terms, the Systems division has organized its sites as follows to protect itself against this risk:

- in Canada, the premises have been arranged in such a way as to prevent damage to furniture and materials. The workshop, which is located on the first floor, comprises a storage area and an assembly area, with most parts stored in high racks. The machines are also mounted on pedestals. This ensures that the equipment remains in good condition and does not come into contact with water in the event of flooding;

- the Barcelona site has also been adapted in the same manner. The warehouse has shelving and a mezzanine floor on which products are stored. The equipment on the first floor is ready to be assembled and shipped. The offices are on the second floor.

The division has also been working on improving its water drainage system to make it more efficient. To that end, regular checks are carried out at our Spanish and Canadian sites.

Systems is also exposed to the risk of heat stress, particularly at its IER Impresoras site in Madrid, its AS Spain site in Barcelona and its AS Canada site. The risk of heat stress is fully integrated into the corporate culture at our Spanish sites since heat waves have been commonplace for decades on the Iberian peninsula. Spain is regularly affected by severe heatwaves, such as in 2024, when temperatures ranged from 39 °C to 42 °C. This risk has long been taken into account in regional and national measures, such as the adaptation of working hours for employees during the summer months. Working days are shortened to between 9 am and 2:30 pm between the end of June and the end of August. Buildings have also long been built and designed with high temperatures in mind, and are therefore equipped with high-performance air-conditioning systems and industrial fans.

The Canadian site is regularly inspected and maintained by the owner. The workshop and offices in the building are heated and air-conditioned, and all employees benefit from flexible working hours throughout the year.

Based on the risk analysis, certain sites such as IER Impresoras, AS Spain and AS Belgium have also been identified as being potentially exposed to the risk of water stress. For example, in 2024, Barcelona was affected by drought. However, given that this entity's activities comprise the provision of services, the momentary or continuous absence of water does not pose a threat to its business continuity. For that reason, there is no need for an action plan to be implemented in the short or medium term.

As regards the Madrid and Belgian sites, there are no records of extreme drought events impacting the Bolloré Group's business activities. For that reason, no action plan has yet been implemented.

### 2.2.4. GROUP CLIMATE CHANGE TRANSITION PLAN (E1-1, E1-2, E1-3 AND E1-4)

In order to anticipate major societal changes and support the adaptations necessary for sustainable development, such as a reduction in the footprint of human activities on the environment or the promotion of the energy transition, the Bolloré Group is deploying mitigation measures for its adverse impacts, strengthening its climate strategy for all its entities, businesses and countries in which it operates, and across its upstream and downstream value chain, and investing for the long term in order to offer innovative low-carbon products and services. This approach is described in detail in the Group's decarbonization plan, which also includes its greenhouse gas emission reduction targets, the decarbonization levers defined to achieve these targets, and the actions implemented over the course of 2024. In the

interests of transparency, the Bolloré Group does not use the term "transition plan" due to the non-alignment of its scope 3 target with the Paris Agreement goals, linked to item 3.1 – Purchases of goods, essentially concerning the purchase of fuels by Bolloré Energy, and item 3.11 – Use of products sold, concerning the sale of petroleum products sold by Bolloré Energy. As such, the Group is excluded from the Paris-aligned Benchmark. Regarding the Bolloré Group's investments in oil, see, in this universal registration document, chapter 5 – Analysis of operations and financial statements, section 1 – Analysis of consolidated results for the fiscal year, part – 1.1.1. Main activities, "Oil logistics".

#### 2.2.4.1. CLIMATE CHANGE MITIGATION TARGETS (E1-4)

In 2023, the Group committed to communicating its greenhouse gas (GHG) emissions reduction targets and specifying the trajectory to meet the expectations of its stakeholders. Its carbon footprint was analyzed and its decarbonization levers were identified with the assistance of a firm of experts, involving the Group's CSR Department and the divisions' heads of CSR/HSE, as well as their chief financial officers, so that these objectives could be integrated into the business strategies and financial planning carried out for each business. This strategy and its objectives were subject to the validation process described in the chapter on CSR governance: first, the strategy was validated by the subsidiaries' Executive management teams, then by the Group's Ethics, CSR and Anticorruption Committee, before being submitted to the Group's Audit Committee, and was finally approved by the Board of Directors.

All the Group's targets are expressed as percentages and can be compared to the 2022 reference year. There are two reasons for this choice of year: firstly, a reference year was chosen from the three years preceding the first year of CSRD reporting, in order to comply with the requirements of this new directive, and 2022 was the year in which the Group's economic activity

actually stabilized following the Covid-19 pandemic. Secondly, scope 2 emissions targets are accounted for using the market-based method, in order to best reflect both the Group's decisions in respect of purchases of renewable energy, using the various contractual instruments available, and its climate strategy. This approach also reflects the fact that renewable energies represent one of the Group's main decarbonization levers.

Scopes 1, 2 and 3 targets have been calculated based on the IPCC scenarios (described above). They are expressed as follows and cover the scope of the Group's GHG emissions assessment:

- 42% reduction in scopes 1 and 2 (market-based), in line with the trajectory of the Paris Agreement on limiting global warming to 1.5 °C by 2030 above 2022 levels;
- 30% reduction in the "combustion of petroleum products sold" post thanks in particular to Bolloré Energy's investments in biofuels (objectives included in this subsidiary's business strategy). This objective will contribute to a 28% reduction in scope 3 emissions for the entire Group in 2030 compared to 2022 levels. However, this realistic target is not in line with the Paris Agreement's target of limiting global warming to 1.5 °C.

### 2.2.4.2. THE BOLLORÉ GROUP'S DECARBONIZATION LEVERS (E1-3)

The decarbonization objectives are consistent with the Group's activities and greenhouse gas emissions. Prior to setting these targets, the CSR Department had carefully identified the decarbonization levers for each of its business activities, with the help of an expert consultancy firm. This allowed it to prioritize actions, define objectives to ensure that its reduction efforts were appropriate to the Group's organization and maximize their environmental impact.

- For scopes 1 and 2, the priority decarbonization levers identified concern the wholly-owned sites in Europe and North America:
  - reducing the carbon impact of electricity use through the consumption of green electricity;
  - replacing refrigerant gases at our plants;
  - renewing our transport fleet;
  - reducing energy consumption in our buildings, excluding electricity consumption (natural gas, domestic fuel oil and urban heating).
- With regard to scope 3, an inventory of all scope 3 items was carried out at Bolloré Group level to identify the most representative items, particularly those relating to the Oil logistics Division. The GHG emissions reduction targets for scope 3 therefore target the most representative emissions concerning our value chain (upstream and downstream), namely:
  - purchases of goods, mainly fuel (item 3.1);
  - use of sold products (item 3.11).

It should be noted that these levers have been identified for application for the period between now and 2030, with an additional effort required for the period 2030-2050. Furthermore, the quantification of the levers depends on the assumptions made by the Group concerning the growth of its business. On scopes 1 and 2, the progress made is being published for the first time this year, as the climate strategy was endorsed at the Board meeting held in March 2024.

#### Assessment of levers for scopes 1 and 2:

In 2024, the Industry Division and more specifically its plants in Brittany, purchased 20% renewable energy (representing 10% at Group level), enabling

green electricity to be integrated into the Group's electricity supply. This electricity has been certified as being from a renewable source by the keeper of the register of guarantees of origin, mandated by the State. However, in the same year, the Bolloré Group increased its market-based scope 2 GHG emissions by 30% compared with its reference year 2022. For the coming years, the Group is committed to increasing its share of green electricity to achieve its GHG emission reduction targets by 2030.

With regard to the decarbonization lever linked to the replacement of refrigerant gases, the Group is working to promote alternative products with a lower environmental impact and to prevent potential leaks that could occur at its sites, and it is striving to analyze accidental releases in order to subsequently optimize its facilities. This approach enabled the Group to reduce its GHG emissions related to this item by 75% between 2022 and 2024. This reduction can be explained in particular by the decrease in SF6 gas consumption for the Breton plants.

Despite the Group's efforts to optimize its vehicle fleet by replacing its diesel vehicles with gasoline, hybrid or electric vehicles, GHG emissions related to passenger transportation increased by 11% between 2022 and 2024, an increase in the activity for goods transport and technicians transport during the year 2024..

Finally, with regard to the reduction of energy in our buildings, the Group has seen an 8% drop in its GHG emissions compared to 2022. This reduction is mainly due to the efforts made by Bolloré Energy Division's sites, with a 29% drop in emissions related to domestic fuel oil and a 15% drop in emissions related to natural gas from the Blue Solutions Canada entity.

#### Assessment of levers for scope 3:

For the 3.11 (Combustion of petroleum products) post, the Group has observed a 16% reduction compared to its 2022 baseline. Furthermore, note that for the 3.1 (Purchase of petroleum products) post the Group has seen a decrease of 35% compared to its 2022 baseline. These decreases are due to the decline in the purchase and sale of fuel oils and the increase in the purchase and sale of HV0100 and HV0NR fuels.

### 2.2.4.3. ACTION PLANS AND RESOURCES TO COMBAT CLIMATE CHANGE (E1-3)

For scopes 1 and 2, the priority decarbonization actions identified were:

- the consumption of green electricity: increase the share of electricity consumption from renewable sources via energy attribute certificates (EAC), such as origin guarantees and renewable energy certificates (RECs) or power purchase agreements. In 2022, electricity consumption from renewable energies accounted for 14% of the Group's total electricity consumption. In 2024, the consumption of electricity from renewable energy was 14.6%, generated by the plants in Brittany and Compagnie de l'Odet.
- replacing refrigerant gases at our plants: this lever is currently subject to technological restrictions, as an alternative to SF6 has not yet been identified, so concrete action is on hold in the short term;
- renewing our transport fleet: the Bolloré Group is committed to optimizing its vehicle fleet by replacing its diesel vehicles with gasoline, hybrid or electric vehicles

- reducing energy consumption in our buildings, excluding electricity consumption:
  - energy efficiency: investments in energy optimization (LED, presence detectors, renovation of heating/air conditioning systems, etc.), renewal of fleets of vehicles, electrification, etc.,
  - sobriety: optimization of consumption, tackling energy waste, ecofriendly actions, etc.

Significant efforts are made every day by all divisions to reduce consumption, optimize operating costs and reduce the impact of their activities on climate change. While industrial sites are the biggest consumers and as such are the subject of special attention, the Bolloré Group is also careful to optimize the consumption of its tertiary sites.

For scope 3, the increasing diversification of the petroleum products sold by Bolloré Energy, with in particular an increase in the sale of biofuels, will automatically cause the two items referred to above (3.1 and 3.11) to fall.

The trajectory below represents the theoretical maximum level of decarbonization, applying the most ambitious scenarios with assumptions concerning the amounts of Opex and Capex defined by a firm of experts and validated by the IER Group's Finance Department. Work on an action plan with investment targets will then begin, as a second phase, in 2025.

	Decarbonization levers	Reference year	Decarbonization potential (tCO <sub>2</sub> eq)	2030 objective (%)	Capex investment assumptions (in euros)	Opex investment assumptions (in euros)
Scopes 1 and 2 (Market Based)	Consumption of green electricity	2022	4.804	-42	-	182,000
	Renewing our transport fleet		4.701		9,353,000	1,300,000
	Reducing energy consumption in buildings		451		255,000	-
	Replacing refrigerant gases		2.784		125,000	-
Scope 3	Diversifying products sold (category 1)	2022	337.881	-30 <sup>(1)</sup>	600,000	-
	Diversification of products sold (category 11)		2,050.252			-

(1) This target only concerns items 3.1 and 3.11.

## 2.2.4.4. THE BOLLORÉ GROUP'S CARBON FOOTPRINT (E1-5 AND E1-6)

### 2.2.4.4.1. ENERGY CONSUMPTION AND MIX (E1-5)

#### **The Bolloré Group's energy consumption and energy mix**

The Bolloré Group's energy consumption is published in MWh (as required by the CSRD) and by type of energy.

	Unit of measurement	2024 data
<b>Energy linked to the Group's own operations</b>		
Consumption of energy linked to the Group's own operations	MWh	158,878
<b>Nuclear</b>		
<b>TOTAL CONSUMPTION OF NUCLEAR ENERGY</b>	MWh	<b>57,002</b>
Consumption of nuclear energy as a percentage of total energy consumption	%	36%
<b>Renewable energy</b>		
Fuel consumption from renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.)	MWh	1,391
Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources	MWh	14,006
Consumption of self-generated non-fuel renewable energy	MWh	0
<b>TOTAL RENEWABLE ENERGY CONSUMPTION</b>	MWh	<b>15,397</b>
Share of renewable sources in total energy consumption	%	10%
<b>Fossil energies</b>		
Fuel consumption from coal and coal products	MWh	0
Fuel consumption from crude oil and petroleum products	MWh	51,346
Fuel consumption from natural gas	MWh	9,840
Fuel consumption from other fossil sources	MWh	0
Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources	MWh	82,295
<b>TOTAL FOSSIL ENERGY CONSUMPTION</b>	MWh	<b>143,481</b>
Share of fossil sources in total energy consumption	%	90%
Energy intensity (in millions of euros of net profit from activities with a strong climate impact)	Intensity	50.75
Net revenue to calculate the GHG intensity	Millions of euros	3,130

The Bolloré Group's activities are all considered as being activities with a strong climate impact.

**Bolloré Group's primary energy data**

	Unit of measurement	2024 data	2023 data <sup>(1)</sup>
<b>Electricity</b>			
Electricity consumption in buildings (offices, warehouses, factories, etc.)	MWh	95 861	87 361
Electricity consumption from renewable sources	MWh	14 006	10 522
<b>Energy in buildings (heating and air conditioning)</b>			
Total urban heating or heating network consumption	MWh	439	423
Total heating oil consumed	m <sup>3</sup>	137	125
Total natural gas consumed	m <sup>3</sup>	1 015 480	976 852
<b>Power generators</b>			
Total diesel (generators, etc.) consumed	m <sup>3</sup>	49	20
<b>Transportation of goods</b>			
Total diesel consumed by the goods transportation fleet	m <sup>3</sup>	2 360	1 966
Total biodiesel consumed by the goods transportation fleet	m <sup>3</sup>	157	123
<b>Passenger transport</b>			
Total diesel consumed by the passenger transportation fleet	m <sup>3</sup>	653	654
Total gasoline consumed by the passenger transportation fleet	m <sup>3</sup>	402	289
Total liquefied petroleum gas (LPG) consumed by the passenger transportation fleet	m <sup>3</sup>	1 196	0
<b>Handling equipment</b>			
Total diesel or non-road diesel consumed by handling equipment	m <sup>3</sup>	373	358
Total liquefied petroleum gas (LPG) consumed by handling equipment	m <sup>3</sup>	3	4

(1) 2023 data recalculated excluding Bolloré Logistics.

**GHG EMISSIONS (E1-6)**

To calculate its carbon footprint, the Bolloré Group follows the methodology of the Greenhouse Gas Protocol, an international protocol aimed at providing a regulatory framework for accounting and reporting GHG emissions. The Group publishes figures for its direct and indirect emissions related to the energy consumed by the Group (scopes 1 and 2, market-based and location-based), as well as a portion of its indirect emissions under scope 3 deemed significant in relation to its activities. Scope 3 data is mainly

calculated using the Group's information systems. Fuel sales data from Bolloré Energy is used to calculate more than 70% of scope 3 GHG emissions. Data relating to post 3.15 (Investments), which represents more than 25% of the Group's GHG emissions, comes directly from the companies in the portfolio of holdings that are considered partners in the value chain. Thus, approximately 26% of GHG emissions are calculated based on primary data obtained from suppliers and partners in the value chain.

**Gross scopes 1, 2 and 3 GHG emissions and total GHG emissions**

The table below shows the 2024 results as well as the historical data for the reference year 2022, these are calculated taking into account the scope of consolidation for the year 2024. Note that the data is reported in tons CO<sub>2</sub>eq, in % or in intensity depending on the category to be filled in.

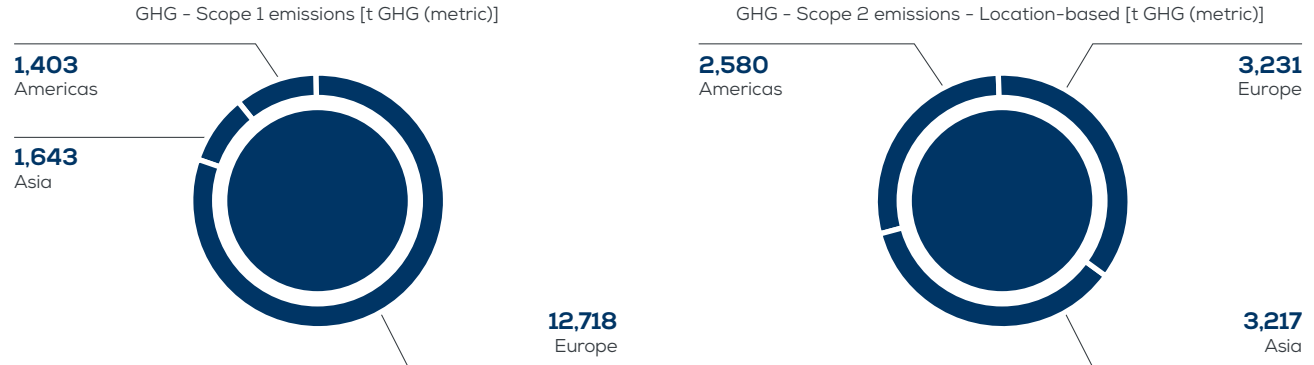
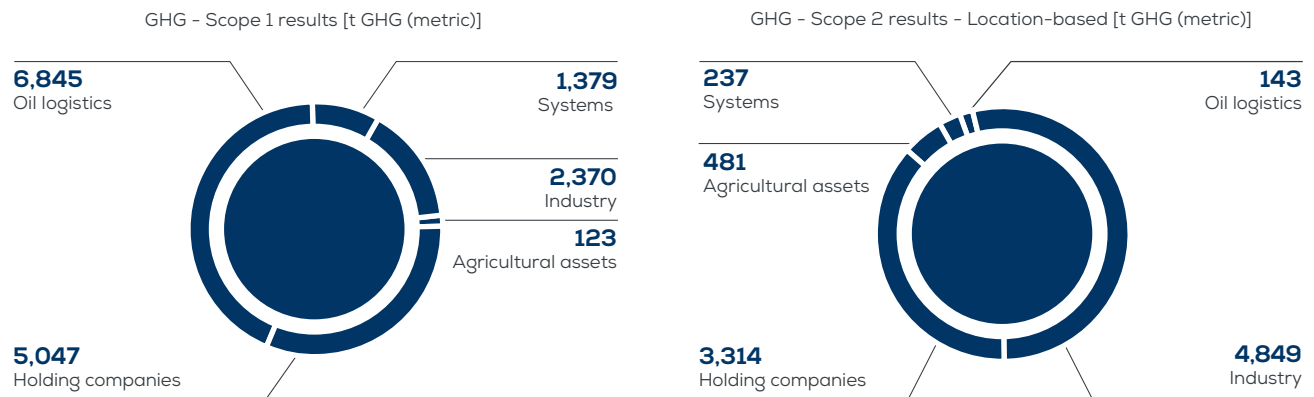
	2024 data (tons CO <sub>2</sub> eq)	2022 data (reference year, tons CO <sub>2</sub> eq)	Change 2024/2022 (in %) (total N-1 – total N-2)	Intensity of reductions in GHG emissions (in %) (total N/total Revenue N)	Forecast 2030
<b>Scope 1 GHG emissions</b>					
Gross scope 1 GHG emissions	15,571	14,990	4	0.00	–42%
Percentage of scope 1 GHG emissions from regulated emission trading schemes (%)	0%	0%	–	–	–
<b>Scope 2 GHG emissions</b>					
Gross scope 2 GHG emissions (location-based)	9,028	10,103	–11	0.003	–42%
Gross scope 2 GHG emissions (market-based)	9,521	7,326	30	0.003	–42%
<b>Scope 3 GHG emissions</b>					
Gross scope 3 GHG emissions	9,366,176	10,610,145		2.99	–28%
Scope 3 posts					
1. Goods and services purchased	1,447,359	2,233,484	–35	0.46	–
2. Fixed assets	29,098	22,958	27	0.01	–
3. Activities in the fuel and energy sectors (not included in scopes 1 and 2)	6,695	4,206	59	0.00	–
4. Upstream transport and distribution	10,380	24,434	–58	0.00	–
5. Waste generated by activities	7,103	6,334	12	0.00	–
6. Business travel	1,350	685	97	0.00	–
7. Employee commuting	4,626	4,953	–7	0.00	–
8. Upstream leased assets	2,533	2,451	3	0.00	–
9. Downstream transport	8,979	7,327	23	0.00	–
10. Transformation of products sold	NA	NA	NA	NA	NA
11. Use of products sold	5,373,666	6,372,792	–16	1.72	–30% <sup>(1)</sup>
12. End-of-life products sold	43,910	51,529	–15	0.0	
13. Downstream leased assets	NA	NA	NA	NA	NA
14. Franchises	NA	NA	NA	NA	NA
15. Investments	2,430,476	1,878,992	29	0.78	–
<b>Total GHG emissions</b>					
<b>TOTAL GHG EMISSIONS – SCOPES 1, 2 AND 3 (LOCATION-BASED) (TONS CO<sub>2</sub>EQ)</b>	<b>9,390,775</b>	10,635,238	–12	3.00	–
<b>TOTAL GHG EMISSIONS – SCOPES 1, 2 AND 3 (MARKET-BASED) (TONS CO<sub>2</sub>EQ)</b>	<b>9,391,268</b>	10,632,461	–12	3.00	–

(1) Or –34% of item 11 "Combustion of oil products" for the Bolloré Energy Division.

(2) NA: not applicable.

**Scopes 1 and 2 results:**

For scope 1, the Bolloré Group saw a 5% increase in its emissions due to the integration of the Fleet Management Services entity, which offers private civil aviation services. For scope 2 location-based emissions, the Group saw an 11% decrease, mainly due to optimization of the Group's energy consumption. The more the Group incorporates a significant proportion of biofuels into its offering, the more the associated emissions will decrease.

**Breakdown of scopes 1 and 2 emissions by region****Breakdown of scopes 1 and 2 emissions by business activity****Scope 3 results:**

The Group notes the following for these three main posts

- A 12% decrease in its total scope 3, mainly due to post 3.11 (Use of products sold), which represents approximately 57% of the Group's total scope 3. For the majority of its emissions, this corresponds to the combustion of petroleum products sold to the Group's customers. This trend is mainly due to the decrease in sales of fuel oils and the increase in sales of HVO100 fuels.
- A 35% decrease for post 3.1 (Goods and services purchased), which represents approximately 15% of the Group's total scope 3, also due to the decrease in purchases of fuel oils and the increase in purchases of HVO100 fuels.
- A 29% increase for post 3.15 (Investments), which represents more than 25% of the Group's scope 3 and which is explained by the good performance of Havas, Canal+ and Louis Hachette Group in the investment portfolio.

**Bolloré Group's 2024 biogenic emissions**

All greenhouse gas emissions relating to scopes 1, 2 and 3 are published in the table above, however there are other specific categories of GHG emissions, notably biogenic emissions. Although these are supposed to have a net zero impact on scopes 1, 2 and 3 emissions since, in theory, the amount of carbon absorbed by the biomass during its growth is equal to that emitted during the combustion of the carbon, the Bolloré Group, reports this category of emissions separately, in accordance with the recommendations of the GHG Protocol.

Biogenic emissions	2024
Scope 1 (tCO <sub>2</sub> )	193.11
Scope 2 (tCO <sub>2</sub> )	0
Scope 3 (tCO <sub>2</sub> )	71,359

**GHG intensity**

GHG intensity by net revenues	2024
Total GHG emissions (location-based) by net revenues (in tCO <sub>2</sub> eq/thousand euros)	0.003
Total GHG emissions (market-based) by net revenues (in tCO <sub>2</sub> eq/thousand euros)	0.003
Net revenue used to calculate the GHG intensity (in millions of euros) (January 1 - December 31)	3,130

### 2.2.4.5. GLOBAL CARBON OFFSETTING (E1-7)

The Bolloré Group has not yet defined a policy or global carbon offsetting projects in order to meet its carbon emissions reduction targets. The Group has initially concentrated on defining a climate strategy that contains

quantified objectives, and has chosen to initially focus all its efforts on the decarbonization levers referred to above, in order to achieve rapid and effective results before embarking on work to offset its residual emissions.

### 2.2.4.6. INTERNAL CARBON PRICING (E1-8)

Carbon pricing has not yet been integrated into the Group's overall strategy. Just like carbon offsetting, this is not a current strategic priority for the Bolloré Group, for two principal reasons: firstly, the Group has chosen to focus its efforts on other critical initiatives, such as its numerous

decarbonization levers. Secondly, in view of the many studies and workstreams involved in producing a comprehensive climate strategy, the Bolloré Group was unable to feasibly implement an internal carbon pricing system, given the significant mobilization of resources this would require.

## 2.3. Industrial and operating accidents (ESRS E2 – Entity specific)

The rating workshops carried out in connection with the preparation of the double materiality assessment served to clarify the issues related to industrial and operating accidents (E2). These IROs are not covered with a sufficient level of granularity by a specific ESRS, but are nevertheless material

due to facts and circumstances specific to Bolloré Energy and Blue's activities. The Bolloré Group therefore provides the additional entity-specific disclosures below to enable users to understand its sustainability-related IROs.

Specific material issue	Impact/risk/opportunity	Description	Scope concerned
<b>Entity-specific (Industrial accidents)</b>	Negative impact	Industrial accident (fire, explosion) associated with Blue's industrial activities, resulting in pollution of water, air, soil and/or biodiversity in areas close to the relevant industrial site. Exothermic reaction that can cause fires or explosions in factories or on production sites	Blue
	Negative impact	Health risks for people living near Blue's battery storage sites, caused by an industrial accident at one of the sites: <ul style="list-style-type: none"> <li>serious and potentially irreparable damage to the health of local residents or communities, which could result in death (e.g. respiratory or cardiovascular problems, cancer, etc.) due to pollution of water, air or soil caused by an industrial accident linked to its industrial activities;</li> <li>exothermic reaction that can cause fires or explosions in factories or on production sites</li> </ul>	Blue
	Negative impact	As part of the mineral extraction process (lithium needed in battery production), degradation of water resources and/or degradation of soil linked to the use and/or uncontrolled discharge of chemicals	Blue
	Legal risk	Convictions (fines and penalties) of managers or legal entities due to breaches of new or existing regulations on the use of substances of (very) high concern (REACH regulation) at sites	Blue
	Reputational risk	Credibility, image and confidence in partners/customers affected by controversies linked to industrial accidents with a material negative impact on water/air/soil/biodiversity	Blue
<b>Entity-specific (Operating accidents)</b>	Negative impact	Pollution of air, water, soil and biodiversity due to operating accidents at a fuel storage site (fire, explosion, accidental release of hydrocarbons) or on the road	Bolloré Energy
	Negative impact	Serious and potentially irreparable damage to health and/or access to food caused by pollution of the soil, reducing agricultural yields (e.g.: reduction in soil fertility and/or soil acidification) near sites	Bolloré Energy
	Reputational risk	Credibility, image and confidence in partners/customers affected by controversies linked to operating accidents with a material negative impact on water/air/soil/biodiversity	Bolloré Energy

### 2.3.1. POLICIES APPLIED (MDR-P)

#### 2.3.1.1. OPERATING ACCIDENTS (BOLLORÉ ENERGY)

The issues associated with operating accidents have been identified as being material for Oil logistics activities. Indeed, as part of its hydrocarbon transport activity, a breach or an accident may have negative, and sometimes irreparable, consequences on the environment and ecosystems. In addition to transportation, the risks of environmental damage and the risks to health and safety are also material in relation to the storage of petroleum products

on a fuel storage site (Bolloré Energy owns 5 Seveso sites (three of which are classified as upper tier) out of more than a hundred industrial sites, all of which are classified as ICPE (facilities classified for environmental protection) sites. As petroleum products are highly flammable, a fire at the depots could have serious impacts in terms of air, water and soil pollution, and cause long-term damage to ecosystems and nearby populations.



Controlling these risks at the sites in question involves the application of a number of policies: compliance with recognized standards such as ISO 14001 on environmental management, or strict regulations such as Seveso or ICPE. These documents list all the practices that need to be put in place, the rules to be followed, and the resources available to prevent, mitigate or, where necessary, address the risks associated with operating accidents. They form part of the management system applied by Bolloré Energy and cover the risks of hydrocarbon spills during loading or unloading operations, as well as the risks of fire at the premises and the storage of hazardous products. These policies take account of the health and safety interests of nearby communities, since they are designed to comply with French regulations, and are verified by the public authorities.

### 2.3.1.2. INDUSTRIAL ACCIDENTS (BLUE)

The issues associated with industrial accidents have been identified as being material for Blue's activities. A number of negative impacts associated with the manufacture of batteries have been identified:

- due to the flammability issues associated with the manufacture and storage of batteries and lithium, industrial accidents at Blue's sites could result in fires and consequently pollute the air, water, soil and ecosystems and impact the health and safety of local residents;
- upstream of production, in relation to the supply of ores, since mining activities are associated with the degradation of water resources and soil. These issues arise well beyond tier 1, as Blue does not directly purchase the minerals used in its manufacturing processes.

The management of the environmental footprint of Blue's sites is formalized through environmental management systems (EMSs) or specific measures and controls consistent with recognized standards such as ISO 14001. The ISO 14001 standard and the management system include the prevention and management of industrial accident risks. In 2024, 100% of Blue's entities were covered by a management system addressing both environmental and health and safety issues. Blue Solutions' battery production sites are also certified to the IATF 16949: 2016, reinforcing aspects linked to safety, traceability and the technical specifications required for automotive production. Various policies and documents formalize how the risks associated with industrial accidents are taken into account:

- the Environment program, signed by Blue's Chairman and CEO, includes a pillar entitled "Reducing the environmental risks and impacts of our activities", with a commitment to "Risk management: ensuring the control of risks linked to the storage of batteries and hazardous materials";

In view of the risk of major accidents posed to local residents, Bolloré Energy's Seveso sites are appropriately monitored and are covered by a major accident prevention policy that documents the company's commitment to protecting people and the environment through a safety management system on the prevention and control of major accidents. Like all Bolloré Energy sites, they are fully covered by a specific environmental policy signed by the Chief Executive Officer in 2022, entitled "The Management team's environmental commitments", which documents Bolloré Energy's commitment to placing environmental protection and pollution prevention issues at the heart of its concerns. Information on sensitive sites such as Seveso sites is available to all stakeholders, as it is referenced and available on government websites. Inspection reports are also available.

- the Blue Solutions emergency plan, which complies with IATF requirements and has been approved by the Managing Director, lists various types of risk, including fire, the frequency and severity of which are rated. The document specifies the actions taken to control risks;
- Blue process risk analysis, formalized via SWOT analyses applied to each QHSE process on battery activities, as well as the application of instructions for the first intervention team member and the second intervention team member. The instructions include a fire department alert sheet setting out the procedure to follow in the event of a fire. Employees are specifically trained to provide an initial reaction force in the event of an accident and to react in the event of an alarm. If necessary, they are able to control the risks associated with a potential fire outbreak. The most recent SWOT analysis was carried out in May 2024;
- Blue also has an intervention plan, formalized in several documents for each building, which is currently being restructured in collaboration with the fire department.

Specific operating methods are derived from these procedures. As Blue Solutions' French sites are classified as ICPEs (facilities classified for environmental protection), they are subject to a classification regime adapted to the scale of the risks and negative impacts that may affect local residents and the environment. Accordingly, these policies take account of the health and safety interests of nearby communities, since they are designed to comply with French regulations, and are verified by the public authorities. Stakeholders can consult information about the business and associated risks online on the government's websites.

## 2.3.2. ACTION TAKEN TO PREVENT THE RISK OF INDUSTRIAL AND OPERATIONAL ACCIDENTS (MDR-A/MDR-M)

### 2.3.2.1. OPERATING ACCIDENTS (BOLLORÉ ENERGY – FROM OWN ACTIVITIES)

Emergency response plans are based on the results of risk mapping exercises carried out by the sites, including analyses of industrial and environmental risks that constitute a decision-making tool in the identification of the necessary preventive or corrective actions. Accident prevention actions are included in the budget that is produced for the HSE Department, which reports directly to Executive management, and approved by the Executive Committee. The activities are also subject to regular internal and external audits carried out pursuant to regulations and as part of certification processes. The defined processes make it possible to report, analyze, record and correct incidents, accidents and compliance failures that can lead to pollution.

In addition, Bolloré Energy has put preventive technical controls in place at all of its facilities to allow more in-depth monitoring of depots and correct any anomalies. Crisis management exercises are carried out every year, complementing the exercises linked to the Seveso internal operation plan, enabling employees to gain practical experience in best practices. These exercises mobilize operational staff on site as well as external personnel (fire fighters, DREAL, etc.). "Crisis cell" exercises are also organized, notably involving head office personnel. Ten internal operation plan exercises were

carried out in 2024. It should also be noted that all Bolloré Energy sites are self-sufficient in mitigating fire risks, with appropriate equipment and processes.

In 2024, 24 internal health and safety audits were carried out on Bolloré Energy's activities, up 58% from 2023.

It should be noted that Seveso sites are subject to specific and particularly strict health and safety rules and are subject to inspections by France's regional environmental, planning and housing agency (DREAL). High thresholds are inspected annually and low thresholds every three years. Every five years, regulatory inspections are carried out on sites classified as ICPE (facilities classified for environmental protection), with four inspections carried out at Bolloré Energy's sites in 2023. Special intervention plans (PPIs) are also drawn up by the departmental prefect, in collaboration with Bolloré Energy, as part of the company's major risk prevention policy. These PPIs set out the appropriate measures to deal with the consequences for the local community if an accident occurs at a site posing a technological risk. No PPIs were implemented in 2024. Bolloré Energy's oil depots are not, however, located in areas with high population density.

Local residents in the area are still informed of the risks associated with oil depots through a number of information and awareness-raising initiatives, including site monitoring committees organized as part of the PPIs, which may be triggered by a decision of the prefecture (one PPI was organized in 2024). As part of the PPIs process, information leaflets summarizing the risks

are produced and sent out to local residents. In 2017, Bolloré Energy began working on voluntary certification under ISO 14001:2015 for all its Seveso oil depots, going beyond the minimum regulatory requirements. As part of the certification, four ISO 14001 audits were carried out in 2024.

### 2.3.2.2. INDUSTRIAL ACCIDENTS (BLUE – FROM OWN ACTIVITIES)

The main risks in terms of industrial accidents identified for Blue's activities are covered by specific mitigation measures:

- in respect of fire risks: deployment of extinguishing and detection systems, training and fire exercises including accidental spill scenarios. In 2024, 10 exercises were carried out for Blue Solutions and 2 for Bluebus;
- in respect of water pollution risks: storm basins to contain polluted water in the event of a fire or accidental spill. Any liquids stored are placed in retention tanks;
- in respect of air pollution risks: managed by systems that treat emissions of volatile organic compounds (VOCs) by thermal oxidation at battery manufacturing sites (France and Canada).

Our LMP® battery production plants in France and Canada, and our electric bus production plants (Bluebus) are also ISO 14001-certified.

It should also be noted that "solid-state" LMP® battery manufacturing technology has the advantage of eliminating the environmental risks associated with the release of hazardous liquids. LMP® batteries are exempt from SVHC (Substance of Very High Concern) rules under the European REACH regulation and CMR (carcinogenic, mutagenic or toxic for reproduction) rules under the CLP regulation.

Periodic inspections (at least once a year) of facilities are carried out in accordance with the regulations in force, and the work carried out by service providers and carriers on the sites is subject to prevention plans and safety protocols. In addition, a safety advisor manages the transport of hazardous goods for all activities.

His or her role includes advising management and ensuring compliance with the requirements for the transport of hazardous goods, including the shipment of products and waste covered by those regulations, via an annual report. In 2024, 22 people were trained in the transport of hazardous materials in relation to Blue's activities. Training sessions on environmental issues are held on an ongoing basis at the various sites (distribution of dashboards updated on a daily basis, training at least once a year, news flashes, etc.).

Every year, training and awareness-raising programs are provided on the prevention of industrial accidents, aimed at all employees who work on site or in jobs subject to specific risks: reminder of emergency instructions, chemical risks, obligations imposed on drivers of hazardous materials.

The instructions for first intervention team members and second intervention team members, deployed as part of our efforts to control the risks associated with operating accidents, are supplemented by training courses run by an external provider, including full-scale exercises that require first intervention team members to wear equipment.

Accident prevention actions are included in the budget that is produced for the HSE Department, which reports directly to Executive management, and approved by the Executive Committee

In 2024:

- only one fire outbreak was reported in respect of Blue's operations, and it was brought under control in the manufacturing areas without the need for firefighters, and no complaints were received from nearby communities;
- 548 people received training on health, safety and environmental issues.

### 2.3.3. TRACKING EFFECTIVENESS OF POLICIES AND ACTIONS THROUGH TARGETS (MDR-T)

To ensure environmental performance monitoring, the divisions' Executive management teams set objectives and targets that are measurable and consistent with the HSE policy for the relevant functions and levels in the

organization. The achievement of targets is monitored at Executive Committee meetings and the annual HSE Department review.

#### BOLLORÉ ENERGY

Bolloré Energy sets itself a number of objectives, which are reviewed annually during departmental reviews. The objectives related to the prevention of operating accidents are as follows:

- produce at least one POI (internal operation plan) for each relevant site every year;

- each year, train all internal and external drivers that load petroleum products at Seveso sites;
- meet 100% of the compliance requirements under prefectural decrees.

#### BLUE

The main objective with regard to industrial or operating accidents is to protect the health and safety of people, and Blue's entities seek to prevent all on-site incidents that could endanger human life. In 2024, only one fire outbreak was reported in respect of Blue's operations. It was brought under

control in the manufacturing areas without the need for firefighters and there were no injuries. No complaints from neighboring communities were reported in 2024.

## 2.4. Optimizing waste management and boosting the circular economy (ESRS E5)

Specific material issue	Impact/risk/opportunity	Description	Relevant scope
<b>Use of natural resources</b>	Negative impact	Contribution to the depletion of natural resources/non-renewable raw materials (upstream and own operations)	Entire scope
	Financial risk	Lower revenues due to issues with the supply of raw materials	Entire scope
	Financial opportunity	Higher revenues due to the development of new product lines (biodiesel from rapeseed, synthetic biofuel)	Bolloré Energy
	Reputational risk	Media exposure/controversies: optics of a group depleting natural resources	Systems
<b>Waste</b>	Negative impact	Poor waste management: <ul style="list-style-type: none"> <li>• following the cleaning of tanks containing hydrocarbon-contaminated sludge and water;</li> <li>• resulting from end-of-life batteries and buses;</li> <li>• or resulting from the manufacture of Automatic Systems' products;</li> <li>• electronic waste from IER's activities (WEEE) (own operations)</li> </ul>	Entire scope
	Financial risk	Increased costs due to insurance, cleaning and waste treatment costs (e.g. WEEE)	Blue and Bolloré Innovative Thin Films Systems

### 2.4.1. MANAGING THE IMPACTS, RISKS AND OPPORTUNITIES ASSOCIATED WITH OPTIMIZING NATURAL RESOURCES

#### 2.4.1.1. DESCRIPTION OF THE PROCESS TO IDENTIFY AND ASSESS IROS (METHODOLOGY, ASSUMPTIONS AND TOOLS USED) (IRO-1)

Two specific issues have been identified in relation to the circular economy:

- 1. The use of natural resources.** As a result of their production activities or their activities closely associated with the extraction of raw materials, the issue of the use of natural resources has been applied to the Group as a whole. The supply of fossil fuels is at the heart of Bolloré Energy's business, as it is a distributor of petroleum products. In terms of industrial activities, the manufacturing and assembly activities of Blue and Systems rely on supplies of metals (steel and aluminum). Blue Solutions depends on its ability to procure a number of processed minerals such as lithium, but these volumes were minimal in 2024, and were mainly linked to the development of prototypes of Gen4 batteries. A financial risk has been identified since issues associated with the procurement of raw materials can slow down or significantly reduce production activities, resulting in lower revenues.
- 2. Waste.** The Group's activities are also associated with negative impacts in the form of waste production. Blue's subsidiaries' battery production activities incorporate recyclability issues associated with the end-of-life of batteries and buses into their strategy. In addition to the waste produced during product assembly processes, Systems' subsidiaries also generate electronic waste. For Bolloré Energy, the most significant waste item, in terms of negative impacts, is the hydrocarbon-contaminated sludge and water generated by tank cleaning operations.

These issues were selected as part of the Group's CSR double materiality assessment, which seeks to identify current or potential impacts, risks and opportunities related to ESG issues, including issues related to the circular economy within its activities and value chain. This work was carried out using a methodology for rating financial materiality and impact materiality, based on consultation with the Group's in-house circular economy experts. The results were then validated at a meeting of the Steering Committee in Spring 2024 dedicated to the double materiality assessment exercise, bringing together members of each subsidiary's Management Committee and the directors of the Group's support functions. The results of the double materiality assessment were also validated by the Ethics, CSR and Anticorruption Committee and presented to the members of the Audit Committee, which submitted them to the Board of Directors for approval in March 2025.

In addition, the expectations of stakeholders on these issues are taken into account and fully factored into subsidiaries' business strategies. An increasing number of customers are including environmental criteria and, more specifically, criteria on the use of natural resources in their invitations to tender. Stakeholders' environmental expectations are also identified as part of the application of the entities' quality management systems. In relation to battery waste, consultations are regularly carried out with public authorities on establishing a framework for the storage of batteries that have reached the end of their life.

#### 2.4.1.2. CIRCULAR ECONOMY POLICIES (E5-1)

The circular economy refers to the production of sustainable goods and services by limiting consumption, reducing the use of resources and reducing waste. Although it does not have a formal policy, the Group's approach to the circular economy is based on properly managing the waste generated by its business activities, thereby reducing its environmental impact while optimizing natural resources. In addition, actions to promote recyclability and waste recovery help to create value. That's why the Bolloré Group's divisions pay particular attention to waste management at their various sites in France and abroad.

The monitoring centers on waste categorized as hazardous waste, and covers waste which, because of its reactivity, flammability, toxicity or other hazardous properties cannot be disposed of in the same way as other waste without endangering people or the environment. Non-hazardous waste covers categories of waste that present no risk to people or the environment. The results of the reporting are used to monitor the production of hazardous and non-hazardous waste at the industrial sites of the Group's entities which, depending on the specific nature of their activities, may be required to implement more specific policies.

**BLUE**

Blue Solutions takes a circularity-oriented approach to design to ensure that its products are developed with recycling and end-of-life in mind.

Within Blue's activities, Blue Solutions has defined a 2024 Environment program that focuses on the challenges of the circular economy in two areas, each with its own commitments:

**"Design to circularity":**

- continuing to develop the industrial lithium recovery pilot project and seeking recycling solutions for other electrochemical processes;
- evaluating the design of the new Gen4 (generation 4) product in terms of the definition of end-of-life battery processes, with the aim of integrating constraints as early as the design phase.

**"Consumption and manufacturing waste":**

- continuing to reduce production waste (improving cathode, electrolyte and lithium yields).

In addition, the division's "Promoting sustainable development" Health, Safety and Environment policy, which covers all its activities, includes a section on "Reducing the environmental impact of our business activities", and states that eco-design, the circular economy and operational safety are at the heart of Blue's development strategy for the next generation of solid-state batteries, via *Bilan Carbone* assessments and Life-cycle analyses, and a commitment to reducing its consumption of natural resources and increasing its recycling of waste.

The environmental program and the Health, Safety and Environment policy are signed by the Chairman and Chairman and Chief Executive Officer of Blue Solutions, and these subjects are managed by the QHSE and R&D Departments and supervised by the Policy Officer and the Sustainability Officer.

**BOLLORÉ INNOVATIVE THIN FILMS**

The commitments of the dielectric film and packaging businesses are formally documented in the "Being an agent of change" Health, Safety and Environment policy, signed by the business' Chief Executive Officer. In the policy, Bolloré Innovative Thin Films states its commitment to continuing to improve the performance of its products with a view to increasing their environmental added value, including through the involvement of suppliers.

In addition, the range of products made from recycled materials and waste sold by Bolloré Innovative Thin Films is ISCC Plus (International Sustainability & Carbon Certification)-certified, demonstrating its traceability and the compliance of its collection and transformation processes with international sustainability standards.

**BOLLORÉ ENERGY**

Although it does not have a formal policy in place, Bolloré Energy contributes to the optimized use of resources, reduces waste and promotes sustainability through the diversification of its activities based on the marketing and distribution of biofuels and alternative petroleum products. These products may be made from food waste, agricultural residues or sewage sludge, and transformed into fuel, thereby reducing the pressure on natural resources.

The circular economy is based on reusing materials: biofuels are part of this approach, as their environmental impact is lower than that of fossil fuels. The use of biofuels in preference to traditional products helps to reduce greenhouse gas emissions, thereby helping to limit the business' carbon footprint and promote a more environmentally friendly production cycle.

**SYSTEMS**

In terms of the policies applied by the entities, all IER's and AS's industrial entities apply an environmental management system, and are implement Quality, Safety, Environment and continuous improvement policies signed by Chief Executive Officers of IER and AS, formally documenting their commitment to sustainable development and to seeking to reduce the overall impact of their business activities on the environment.

The subsidiary conducts in-depth monitoring of the overall quantity of waste and reports it annually during the QHSE Department review. Systems also

takes account of circular economy and resource optimization challenges as early as the design phase of its products. More than 80% of the products manufactured by the Systems businesses, often with lifespans of more than fifteen years, are recyclable in the waste market. For example, the new "FirstLane" security corridor designed by Automatic Systems (AS) meets this objective by having a recyclability rate of 90.7%, calculated according to IEC 62635/2012 and a revaluation rate of 93%.

**2.4.2. REASONABLE USE OF RESOURCE INFLOWS****2.4.2.1. TARGETS RELATED TO RESOURCE USE AND CIRCULAR ECONOMY (E5-3/MDR-T)****BLUE**

The formal objectives for Blue's businesses are set out in the business' environmental program, signed by the Chairman and Chief Executive Officer. These issues are managed by the QHSE and R&D Departments and supervised by the Policy Officer and the Sustainability Officer, and meet the requirements of European regulations on batteries.

Although the Gen4 products have not yet been developed on an industrial scale or marketed for sale, objectives have already been identified and formally set, and will come into effect as soon as production begins.

Accordingly, by 2030, every Gen4 model of industrial battery with a capacity of more than 2 kWh must:

- include 16% cobalt recovery from battery manufacturing waste or post-consumer waste;
- include 6% nickel recovery from battery manufacturing waste or post-consumer waste;
- include 6% lithium recovery from battery manufacturing waste or post-consumer waste.

**BOLLORÉ INNOVATIVE THIN FILMS**

Bolloré Innovative Thin Films pursues objectives related to increasing circularity in product design and reducing the use of raw materials to the extent possible. By the end of 2025, the business is aiming to:

- introduce monitoring of circular and biosourced resins for its dielectric films business;
- grow the sales of its packaging films that incorporate post-industrial recycled materials (BFFRi, BRi, BZNRi and BTTXRI), by increasing unit sales of these ranges from 2024 levels, with volumes exceeding 1,140 tonnes;

- grow the sales of its packaging films containing circular and biosourced resins through the use of cooking oil (MP UCO – Used Cooking Oil) in the BNAT-T, BCF-LC, and BSF-LC ranges, with volumes exceeding 95 tonnes;
- include 88% recyclable films in the sold volume of packaging films in the polypropylene and polyethylene sector.

## BOLLORÉ ENERGY

In 2024, 98% of fuel deliveries to Bolloré Energy's retail depots were made by vehicles running on biofuel. As part of its contribution to the optimized use of resources and the promotion of sustainability through the diversification

of its business activities based on the development of biofuels, Bolloré Energy has set itself the target in 2025 of making all these deliveries using vehicles powered by biofuels (Izipure and Koolza100).

### 2.4.2.2. RESOURCE USE OPTIMISATION (E5-2/E5-4)

#### BLUE

Improving the recyclability of its products is a priority for Blue Solutions, which is committed to creating a sustainable value chain by adopting a circularity approach and ensuring that products are developed with their end of life in mind.

The battery manufacturing process is designed to be as environmentally friendly as possible, for example through the use of a dry, solvent-free cathode extrusion process, the use of ultra-thin anodes and cathodes, and the re-injection of recycled materials into the production line. These processes, applied for generations 2 and 3, are currently being developed for Gen4.

To address the individual electric vehicle market, since 2021, Blue Solutions has been focusing its R&D efforts on the development of a new fourth-generation (Gen4) solid-state battery technology. An ambitious R&D plan has been undertaken to take to market a battery adapted to the needs of car manufacturers in terms of performance and environmental quality in 2029. This Gen4 technology will implement the best design and manufacturing practices, anticipating the recycling and end-of-life stages, and will meet increasingly ambitious European regulations. NMC (Nickel Manganese Cobalt)

technology, chosen for the Gen4 batteries, will employ resources with a higher added value in terms of recycling than previous generations. To further the development of the next generation of its Gen4 batteries, the innovation team is reinforced each year and now has more than 100 employees who advance the work at the company's various sites (Blue Solutions and the lead laboratories CNRS, Grenoble INP-UGA, Nantes Université).

In addition, Blue Solutions sources its raw materials and other materials and components through its Purchasing Department, and uses a specific nomenclature for classifying its strategic resource inflows, which are categorized as "Items of nomenclature with an impact on sold products".

It should be noted that supplies in 2024 were limited to small, marginal quantities. Indeed, 2024 was a transition year between two generations of battery. The company's strategy was to sell off its Gen3 stocks and to start developing future suppliers for the next generation. The Gen4 battery is not yet on the market: nothing is being produced on an industrial scale and the buyers are therefore participating in R&D efforts and are not committing to large industrial purchasing volumes.

## BOLLORÉ INNOVATIVE THIN FILMS

The main raw materials used in the dielectric and packaging films are polypropylene, polyethylene and EVOH (ethylene vinyl alcohol – a gas barrier material). Bolloré Innovative Thin Films ecodesign work is at the heart of its product development strategy and focuses on the following areas:

- saving resources: by reducing the thickness of films and using renewable materials;
- strengthening the circular economy: through the development of recyclable products and the use of recycled materials.

The Films Packaging division seeks to save resources and increase recyclability, while guaranteeing the optimization and protection of packaged products, through a 3R approach: Renew, Reduce and Recycle.

#### Use of postindustrial regenerated material

Since 2019, Bolphane R3 films have been used by manufacturers and end consumers to minimize their consumption of materials and their carbon footprint. All the films in the range are recyclable, and Bolphane R3 films also incorporate materials derived from renewable and recycled raw materials. The BRi range, marketed for the packaging of industrial goods and consumer products, contains 30% post-industrial regenerated material.

#### Use of repolymerized plastic waste

In 2024, Bolloré Innovative Thin Films chose to start using high-quality recycled materials obtained through an advanced recycling process for post-consumer plastic waste. This technology breaks plastic waste down into its

basic chemical components before repolymerizing it into raw materials of a quality equivalent to ISCC Plus-certified food-grade virgin materials. This technology is an important step in improving the recycling of hard-to-recycle plastics, which avoids them being incinerated or sent to landfill, while enabling them to be reused safely and efficiently in food packaging.

#### Use of biosourced materials

- Launch of a first generation of biosourced products.
- Made of polyethylene from sugar cane residues, with the B-Nat®-O range comprising more than 40% polyethylene from ethanol derived from sugar cane (more than 4.8 tonnes of sugar cane agricultural waste incorporated), and the B-Nat®-F range made from used cooking oil and certified using a mass balance approach, available since 2017. Biosourced products have the advantage of generating lower carbon emissions than virgin raw materials, and are based on the use of renewable resources.

In 2024, 88% of films in the packaging activity for Bolphane R3 (industrial application) and Bolfresh (food application) ranges were recyclable (based on the volume sold) in the polypropylene and polyethylene sector. In 2024, 363 tonnes of reggranulated material (technically called: BZNRi, BTTXRi, BRi) were incorporated into the Bolphane range of products and 391 tonnes of reggranulated material (technically called BFFRi) were incorporated into the Bolfresh range of products. The data presented are calculated taking into account inventory withdrawals.

## BOLLORÉ ENERGY

The latest technological advances make it possible to guarantee a liquid and storable fuel that is more environmentally friendly. Since 2018, Bolloré Energy has offered its customers cleaner alternatives by reducing the portion

of fossil fuel products it distributes in order to align its strategy with the energy transition:

- biofuel oil products;
- biofuels;
- alternative oil products.

## Bio fueloil

As a pioneer in the distribution of biofuel oil in France with the launch of Biofioul Évolution (F5) in 2019, Bolloré Energy has been offering its customers an F30 bio fuel oil containing 30% biofuel, Calorza, since January 2022. Biofuel oil is a bioliquid for heating consisting of rapeseed oil, produced in France, and mineral fuel oil, as well as an additive that alone reduces energy consumption by 7%. Based on national data from the carbon calculator published by Ademe (French environment agency), increasing the proportion of rapeseed oil in the product made it possible to meet the government's demands by remaining below the threshold of 250 grams of CO<sub>2</sub> per kilowatt hour announced at the Citizen's Climate Convention. Composed of plant matter, this bio fueloil represents an alternative to domestic fuel oil and is compatible with all heating systems for individuals and professionals. Bolloré Energy is working to spread this innovative product throughout France, in particular through a number of awareness-raising initiatives.

## Biofuels

Bolloré Energy is also a pioneer in the development and promotion of low-carbon liquid alternative fuels, in particular through the following solutions:

- 1) Bolloré Energy has sold its Koolza100, a B100 biodiesel produced solely from rapeseed and processed in France, since 2021. As an ecological alternative to fossil diesel with equivalent autonomy, Koolza100 offers professionals, such as carriers or the rail industry, an immediate environmental solution as it reduces CO<sub>2</sub> emissions by 60% and fine particle emissions by up to 80% compared to conventional diesel. On July 15, 2024, SNCF engaged Bolloré Energy to supply the hybrid Régiolis train, which is being tested in the Grand Est region, with biofuel.
- 2) Bolloré Energy also distributes Izipure, its 100% renewable synthetic biofuel throughout the country. Made from organic waste, this biodegradable, odorless biofuel reduces CO<sub>2</sub> emissions by up to 90% compared to conventional diesel and is compatible with almost all new or older diesel engines. In July 2024, Daimler Truck France, a subsidiary of Mercedes-Benz Trucks, organized the Arocs Xtrem Bivouac event. For two weeks, customers, prospects and journalists drove around the Gortias estate, testing the trucks and various machines running on HVO100 supplied by Bolloré Energy.

- 3) Bolloré Energy is developing its energy transition strategy by obtaining ISCC EU (International Sustainability & Carbon Certification) certification from Control Union Global. Offering proof of the sustainability of low-carbon products, ISCC certification provides customers with reassurance that the B100 (Koolza100) and HVO100 (Izipure/NesteMy) purchased from Bolloré Energy are traceable.

Bolloré Energy uses certified biofuel suppliers. Its Koolza100 comes from a supplier with 2BSvs certification, a voluntary protocol aimed at the energy market and recognized by the European Commission. The 2BS certification system, which is applicable worldwide, demonstrates sustainability criteria from the production of biomass to the collection of inputs, all the way through to the processing and production of biofuels, bioliquids or combustibles. Izipure comes from a producer certified under ISCC (International Sustainability & Carbon Certification). ISCC is a certification system that can be applied to all biomass to verify the responsible nature of supply chains for agricultural biomass or biogenic waste and residues. It addresses the issues of reduced greenhouse gas emissions, sustainable land use, protection of natural biospheres and improved social sustainability. In 2024, Bolloré Energy does not have the information necessary to publish the totals and weights of bio-based materials or recycled or reused components in the products sold by the Division.

## Distribution of alternative oil products

Bolloré Energy is also committed to promoting the use of biofuels with carriers that the company calls on to distribute its petroleum products. In 2024, 98% of fuel deliveries to Bolloré Energy's retail branches were made by vehicles running on biofuel (Izipure and Koolza100), whereas they accounted for around 88% of such deliveries in 2023. Bolloré Energy is also seeking to extend this initiative to the deliveries made of its trading agencies, as part of the key account distribution network.

## The development of low-carbon services

Since 2020, a specific sales organization has also been dedicated to the promotion of these new solutions including biofuel oil, biodiesel (Koolza100), Izipure, B10 diesel and a range of products with additives such as AdBlue®. As a result, Bolloré Energy has identified the need to invest in the training of all of its sales teams and to raise awareness among its customers. All Bolloré Energy managers were educated on the environmental stakes associated with low-carbon products, and every new employee receives a specific presentation on the topic.

Lastly, Bolloré Energy has launched a website dedicated to the energy transition for professionals: [jedecarbonatevebe.fr](http://jedecarbonatevebe.fr)

## SYSTEMS

The Systems entities are rolling out a number of different initiatives to optimize resources. Systems products are developed without any end-of-life planning, and do not incorporate programmed obsolescence. As such, Systems encourages its customers to take steps to improve the equipment they use if its functionality no longer meets their expectations. Most new products are sold with multi-year maintenance contracts, and the availability

of spare parts is guaranteed for periods ranging from seven to ten years. Customers are notified of any future obsolescence.

In 2024, a project to calculate the carbon footprint of IER's products, based on Life-cycle assessment, was launched using the "CO<sub>2</sub> equivalent weight" criterion.

## 2.4.3. OPTIMIZED WASTE MANAGEMENT

### 2.4.3.1. TARGETS FOR RESOURCE OUTFLOWS (E5-3)

#### GROUP

As part of the formalization of its CSR strategy, and in particular its "Environment" focus, Group objectives are set annually:

- by 2027, 80% of Bolloré Group's entities with an industrial site must have produced an environmental risk map. In 2024, the rate was 40%;
- by 2030, 100% of Bolloré Group entities with an industrial site must have introduced annual HSE performance reviews by their Management Committee, Executive Committee or Board of Directors. In 2024, the rate was 90%;

- by 2026, 85% of entities with an industrial site must have formally documented an environmental policy, and 100% of these entities must have done so by 2030. In 2024, the rate was 60%.

These objectives are drawn up jointly by the CSR Department and its network, at meetings of Steering Committees organized to ensure that the Group's strategy is properly implemented by its businesses.



**BLUE**

The formal objectives for Blue's businesses are set out in the business' environmental program, signed by the Chairman and Chief Executive Officer. These issues are managed by the QHSE and R&D Departments and supervised by the Policy Officer and the Sustainability Officer, and meet the requirements of European regulations on batteries.

In particular, Blue Solutions has set itself the following targets in terms of the recyclability of its batteries:

- a recycling capacity of 65% of the average weight of its batteries<sup>(1)</sup> in 2025;
- a recycling capacity of 70% of the average weight of its batteries<sup>(1)</sup> in 2030.

In 2024, Blue Solutions was able to recycle 70% of the average weight of its Gen3 batteries.

- Achieve a copper recovery rate of 90% by 2027 for Gen2 and Gen3 industrial battery models.

In 2024, Blue Solutions achieved an average overall copper recovery rate of over 50%.

- Achieve a lithium recovery rate of 50% by 2027 for its battery models with a capacity of more than 2 kWh.

This target was achieved in 2024 for Gen3 models. No results have yet been obtained for the Gen4, as this model is not currently produced on an industrial scale. However, the prototype model is currently being tested and could achieve a recovery capacity of between 80% and 90%.

**BOLLORÉ INNOVATIVE THIN FILMS**

Bolloré Innovative Thin Films environmental program formally documents the objectives identified for the end of 2025 concerning the optimization of waste management:

- objective to maintain a recovery rate for reuse (granulation) of production losses in dielectric films of over 95%;
- objective to limit the quantity of waste from unsorted dielectric film activities to 45 tonnes;
- objective to maintain a recovery rate for reuse (granulation) of production losses in packaging films of over 90%;

- objective to limit the quantity of waste from unsorted packaging film activities to 140 tonnes.

Plastic packaging is also subject to various restrictions and bans at both European and national levels. At European level, the PPWR (Packaging and Packaging Waste Regulation) aims to achieve 100% recyclable packaging by 2030. On a national level, with the enactment of law no. 2020-105 on reducing waste for a circular economy ("Agec law"), which aims to end the sale of single-use plastic packaging by 2040. Under this law, reduce, reuse and recycling targets will be set by decree every five years.

**SYSTEMS**

As regards Systems activities, the effectiveness of the actions implemented in the areas of the circular economy and waste optimization is monitored as part of ISO 14001 certification. In this respect, IER has set itself the target of recycling 80% of its waste.

**2.4.3.2. ACTIONS AND RESOURCES RELATED TO THE OPTIMIZATION OF WASTE MANAGEMENT (E5-2)**

Each year, the Bolloré Group strengthens its waste reporting process by refining its analysis mesh by sub-categories (more than 30 categories of waste identified such as paper, wood, metals, used oils, etc.) thereby ensuring a more detailed traceability of reported waste and improving the indicator's coverage rate. These categories are classified as hazardous and non-hazardous waste.

**BLUE**

In respect of Blue's activities, waste from the industrial sites is managed as follows:

- the waste generated is sorted and primarily sent to recycling channels;
- the various blended waste from the plants in Brittany are directed to energy recovery facilities.

No waste is sent to landfill: Blue Solutions calls on recovery and recycling service providers for wood, cardboard and metals.

In terms of product recycling, it should be noted that there is currently no solution on the European market for recycling lithium-metal batteries that use lithium-ion technologies. This is why Blue Solutions has been working since 2020 to develop a unique, innovative and patented solution to extract, recycle and reuse lithium metal from end-of-life LMP® batteries. The results obtained from the prototype are very promising with more than 80% extraction of lithium-metal and a very high degree of purity. Once recovered, the lithium is

processed so that it can be reused, thus reducing the need to extract new materials. The purity of the lithium is not yet sufficient to be reused in new batteries, and the product is currently being resold to another manufacturer.

Nearly two million euros have been invested to date, and Blue Solutions is continuing to improve and develop this process to achieve 90% extraction. It plans to deploy it on an industrial scale by 2027 for returned Gen2 and Gen3 batteries, which have a minimum operating life of ten years. Deployment of the second stage of the current pre-pilot line for the recycling process will begin in early 2025. The rest of the battery cell is processed via the standard black mass recovery network (a term that refers to the polymer mixture involved in creating the battery). A project is currently looking at ways of recycling and recovering the rest of the cell and, in 2021, Blue Solutions established innovative partnerships to work on recycling the black mass and recover materials.

**BOLLORÉ INNOVATIVE THIN FILMS**

In terms of Bolloré Innovative Thin Films packaging and dielectric film production businesses, scraps from the production of dielectric film and certain ranges of packaging films are crushed and re-extruded to transform them into a secondary raw material. These by-products are sold to customers or, in the case of packaging film, may be reused in the manufacturing process (BRI reference using 30% of postindustrial recycled material, a process that was extended to two other references in the Bolphane and Bolfresh ranges in 2022). Manufacturing scraps that cannot be transformed into by-products in-house all have recycling solutions.

All films produced by Packaging Films, the packaging business, can be recovered at the end of their life, either by recycling or by energy recovery in accordance with EN 13431. Bolloré Innovative Thin Films is committed to

complying with current and future regulations, adapting its products accordingly, and pressing ahead with its ecodesign strategy:

- of the Bolphane R3 range: with 100% recyclable products to date, one BRI product incorporating postindustrial regenerated material, and B-Nat® 0 and B-Nat® F products incorporating biosourced material, recyclable RCB products containing a proportion of recycled polymers from post-consumer plastic waste;
  - of the Bolfresh range: with currently one OXBTEC\_RCB® reference, suitable for food contact, and BFFRi incorporating postindustrial regenerated material.
- Furthermore, the development of advanced recycling of plastic waste on an industrial scale represents an additional opportunity to recover postindustrial and post-consumer film waste, particularly for food-grade films. Bolloré Innovative Thin Films is closely following this development and is contributing to its implementation by already using materials recycled via this technology in some of its products. This approach is applied across its entire range.

(1) For industrial battery models with a capacity of more than 2 kWh.



## BOLLORÉ ENERGY

Specifically for Bolloré Energy, the oil depots treat residual hydrocarbons by thermal recovery or by placing them in landfill.

Service contracts covering the whole of France with companies that specialize in the recycling and recovery of hazardous waste, in particular hydrocarbon waste and used oils, have been in place for around ten years and continued to apply in 2024.

## SYSTEMS

Systems' subsidiaries are working on the recyclability and waste management of both their own products and those of their suppliers. For example, Automatic Systems strives to reduce its share of total waste by working with its component suppliers to ensure that their packaging is recyclable and reusable. The subsidiary conducts in-depth monitoring of the overall quantity of waste and reports it annually during the QHSE Department review.

In addition, as part of the deployment of their environmental management system, Systems' entities carry out an environmental risk mapping exercise, which is updated at least once a year and more frequently where necessary:

- production of hazardous waste (soiled rags, WEEE (Waste from Electrical and Electronic Equipment), soiled empty packaging, empty aerosols, etc.);
- the use and storage of cleaning products that may present environmental risks.

It should be noted that 67% of Systems entities with an industrial site were ISO 14001-certified in 2024.

In response to regulations (European directive 2002/96/EC), IER is implementing a comprehensive solution for the recovery and reprocessing of its end-of-life

products. In 2009, it signed a contract for a treatment solution with a certified and approved company. In France, it also joined a government-approved eco-organization on July 1, 2013. IER also offers its customers the opportunity to benefit from the recycling solutions it has set up with its certified service providers for earlier products not covered by the regulations and for facilities outside Europe. This is the case in North America, where the recycling of end-of-life electronic products is not yet regulated: IER, at the customer's request, offers dismantling, packaging and return of equipment to the factory. The recovered metal is then recycled and electronic waste passed on to specialist organizations. In 2023, under the Agec law on reducing waste for a circular economy, the subsidiaries IER, EASIER and Automatic Systems submitted a prevention and ecodesign plan. This plan fulfills the obligation arising from article 72 and article L. 541-10-12 of the French environmental code (*Code de l'environnement*), which state that manufacturers must draw up a five-year plan containing data on reduction and reuse, the origin of raw materials and the consumption of recycled materials and recyclability.

### 2.4.3.3. RESOURCE OUTFLOWS (E5-5)

The Group pays particular attention to monitoring its waste at the various sites in France and abroad, the management of which is one of the measures implemented to reduce the risk of local pollution (storage of hazardous materials in particular). Monitoring concerns "hazardous" waste (waste which, due to its reactivity, flammability, toxicity or other hazardous properties, cannot be disposed of by the same means as other waste without creating risks for people or the environment) and "non-hazardous" waste (which does not present any risk to people or the environment). The results of the reporting make it possible to monitor the production of hazardous

and non-hazardous waste from the industrial sites of the entities included in the CSR reporting.

Hazardous waste comes from the activities carried out by Bolloré Energy (oil depots where residual hydrocarbons are either treated by thermal recovery or buried) and the Industry division (battery production plants, and WEEE at IER). Since 2017, the Bolloré Group has strengthened its waste reporting process by refining its analytical grid by waste subcategories (more than 30 categories of waste identified such as paper, wood, metals, used oils, etc.), thus ensuring more precise traceability of the reported waste and improving the coverage rate of the indicator.

#### Bolloré Group's 2024 consolidated waste

The Bolloré Group does not yet have details of the type of recovery and the type of disposal of its waste. The Group will work on setting up a monitoring system that will enable this classification to be presented for future years.

(in metric tons)	Oil logistics	Industry	Other activities	2024 Total
<b>Total amount of disposed hazardous waste</b>	561	555	4	<b>1,120</b>
Amount of recycled or recovered hazardous waste	449	232	4	685
Amount of disposed hazardous waste	112	323	0	435
<b>Total amount of disposed hazardous waste</b>	73	4,258	57	<b>4,388</b>
Amount of recycled or recovered non-hazardous waste	31	4,019	51	4,101
Amount of disposed non-hazardous waste	42	239	7	287
<b>TOTAL HAZARDOUS AND NON-HAZARDOUS WASTE (RECYCLED, RECOVERED AND DISPOSED OF)</b>	634	4,812	62	<b>5,508</b>
Percentage of recycled or recovered hazardous and non-hazardous waste	76%	88%	89%	87%
Percentage of disposed hazardous and non-hazardous waste	24%	12%	11%	13%

**Bolloré Group's 2024 primary consolidated waste**

(in metric tons)	Total weight 2024
<b>Hazardous waste</b>	
Treated or contaminated wood	4
Empty contaminated packaging	35
Other contaminated waste (rags, sawdust, filters)	37
Contaminated water	554
Spent hydrocarbons and oils	10
Paints and solvents	3
Chemical residues	4
Batteries	133
Waste from Electrical and Electronic Equipment (WEEE)	23
Aerosols	1
Office supplies (printer/toner cartridges)	0.2
Sludge and soiled earth	67
Other hazardous waste	249
<b>Non-hazardous waste</b>	
Untreated wood/pallets	289
Cardboard	383
Paper	22
Plastics (bottles, packaging, bags, film, etc.)	2,706
Green waste	1
Ferrous scrap metal	301
Other metals	99
Glasses	15
Rubble and ballast	0.4
NHIW (unsorted waste)	571
Other non-hazardous waste	2
<b>Total waste by category</b>	
<b>TOTAL HAZARDOUS WASTE</b>	<b>1,120</b>
<b>TOTAL NON-HAZARDOUS WASTE</b>	<b>4,388</b>
<b>TOTAL HAZARDOUS AND NON-HAZARDOUS WASTE</b>	<b>5,508</b>

## 3. Social information – Promoting quality working conditions

In its Code of Conduct, the Bolloré Group specifies that it is aligned with international standards relating to corporate social responsibility (CSR) challenges, such as the Guiding Principles of the United Nations, those of the Organization for Economic Cooperation and Development (OECD), and the United Nations Global Compact, of which the Bolloré Group has been a signatory since 2003.

The Bolloré Group supports the ten principles of the United Nations Global Compact, including those relating to human rights and international labor standards, and it is committed to integrating them into its strategy, culture and day-to-day operations.

- The Bolloré Group's Ethics and CSR Charter sets out its major commitments to sustainable and inclusive development. In addition to complying with regulatory requirements, the normative framework of the Bolloré Group's ethics and CSR approach incorporates the principles set out in the International Bill of Human Rights, the Guiding Principles of the United Nations relating to companies and human rights, the principles of the OECD intended for multinational corporations, the ISO 26000 guidelines, the United Nations Global Compact principles, and the United Nations Sustainable Development Goals.

The Code of Conduct and the Ethics and CSR Charter form the basis of the Bolloré Group's approach and are signed by the Chairman of the Bolloré Group and approved by the Ethics – CSR and Anticorruption Committee.

The provisions of the Code of Conduct and the Ethics and CSR Charter apply to the Bolloré Group and to all the subsidiaries over which it exercises a majority control within the meaning of French law, as well as to the employees and non-employees of these subsidiaries.

Compliance with the commitments set out in the Code of Conduct and the Group's charters is the principal guarantee of the Group's compliance with its obligations and its environmental and social commitments.

The Code of Conduct is available on the Group's website and distributed to its partners as an integral part of the Bolloré Group's requirements. In addition, in accordance with the law, the Code of Conduct is incorporated into the internal regulations of all Group subsidiaries that have such regulations and is distributed to all their employees.

The Code of Conduct clearly stipulates that anyone contravening its principles is liable to disciplinary action or legal prosecution, in accordance with applicable law.

To that end, a whistleblowing system has been put in place to report on any behavior contrary to the Code of Conduct. The Group guarantees whistleblowers protection against any form of retaliation through this whistleblowing system. Whistleblowing reports can be made using a dedicated platform,

accessible from the Group's website or at [alert.bollore.com](mailto:alert.bollore.com). The whistleblowing system is accessible to all Group stakeholders, in particular its employees, suppliers and subcontractors, and members of their staff, as well as to the non-salaried staff of the Bolloré Group and its subsidiaries. This professional whistleblowing system does not replace the external reporting procedures provided for by law.

An awareness-raising program described in detail in the following paragraphs has been designed to ensure optimum understanding of the Code of Conduct, its policies and the whistleblowing mechanism it incorporates.

In addition, the Group affirms its commitment to human rights by supporting the ten principles of the United Nations Global Compact covering human rights, labor standards, the environment, and the fight against corruption. The Group is committed to integrating these fundamental principles into its strategy, culture and day-to-day operations consistent with the commitments set out in its Code of Conduct. To ensure compliance with these commitments, correspondents have been appointed to receive any reports of non-compliance and ensure a rapid and appropriate response in the event of non-compliance.

The Group has put in place processes and mechanisms to monitor compliance with the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work and the OECD guidelines for multinational enterprises. These whistleblowing mechanisms involving various experts (compliance, HR, DPO, CSR) are specified in the Code of Conduct and communicated to all Group employees. The Bolloré Group's commitments on human rights are set out in its Code of Conduct, the provisions of which apply to the Bolloré Group and to all subsidiaries over which it exercises a majority control within the meaning of French law, as well as to the staff of these subsidiaries, whose employees are also trained in this matter, notably through e-learning programs.

In the event of a breach of the rules associated with the Code of Conduct, the facts can be reported by accessing the ethics line via the "[alert.bollore.com](mailto:alert.bollore.com)" website or by scanning a QR code.

The Bolloré Group's labor policies are aligned with relevant internationally recognized instruments, including the United Nations Guiding Principles on Business and Human Rights. These points are explicitly included in the Group's commitments and formalized in the Code of Conduct.

The policies of the Group and its subsidiaries explicitly prohibit human trafficking, forced labor, compulsory labor and child labor, in accordance with the principles set out in its Code of Conduct.

### 3.1. Uniting and protecting people, the company's greatest strength (ESRS S1)

#### 3.1.1. SUMMARY TABLE OF MATERIAL IROS FOLLOWING THE DOUBLE-MATERIALITY ASSESSMENT

Specific material issue	Impact/risk/opportunity	Description	Scope concerned
<b>Working conditions and social dialogue (in operations)</b>	Negative impact	Negative impact on the well-being of employees or their representatives due to: – the absence of or failure to respect labor rights and freedoms (freedom of association, trade union rights, collective bargaining, protection of workers' representatives, discrimination against workers' representatives); – excessive working hours/poor work-life balance (overwork, depression, risk of burn-out)	Entire scope
	Reputational risk	Media controversies linked to poor working conditions liable to damage the company's image	Entire scope

Specific material issue	Impact/risk/opportunity	Description	Scope concerned
<b>Diversity, equity and inclusion (in operations)</b>	Negative impact	Impairment of psychological well-being linked to psychosocial disorders: feelings of fatigue, sadness, depression, deterioration in health, social isolation, etc.	Entire scope
	Negative impact	Negative repercussions linked to incidents of harassment/discrimination on career or employment (gender equality, disciplinary measures, forced transfer, refusal of promotion, fear of applying for new jobs, etc.)	Entire scope
	Positive impact	Improved team well-being, commitment and performance resulting from a good diversity, equity and inclusion policy	Entire scope
	Financial risk	Increase in costs resulting from: – increased turnover and absenteeism due to resignations of employees affected by injustices linked to diversity and inclusion issues; – increased penalties for non-compliance with disability quotas	Entire scope
<b>Training and skills development (in operations)</b>	Positive impact	Organization of training sessions to improve employee satisfaction, engagement and employability: increased employee fulfillment, improved performance and greater internal occupational mobility	Entire scope
	Financial opportunity	Lower costs resulting from the retention of key skills within the company and reduced turnover (lower recruitment, training and integration costs).	IER Automatic Systems Polyconseil Blue Solutions, Bluebus, Bolloré SE Odet
	Financial risk	Increased costs resulting from turnover in technical skills, the risk being the loss of employees with leading-edge skills (Polyconseil)	IER Automatic Systems

### 3.1.2. MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL (SBM-3)

As part of the Group's double-materiality assessment, the material impacts, risks and opportunities (IROs) identified for the issues of "working conditions and social dialogue", "diversity and inclusion" and "training and skills development" were assessed.

The Group's activities are mainly carried out in geographical regions in which employment rights are highly regulated. 77% of the workforce is based in

France, and the vast majority of its other employees are located in the European Union or North America, which apply rigorous legal frameworks for working conditions, social dialogue and diversity and inclusion. The commitments made and policies applied by the Group in the areas covered by this chapter comprehensively and appropriately cover the material impacts, risks and opportunities identified in the double-materiality assessment.

#### 3.1.2.1. THE GROUP'S COMMITMENT IN FAVOR OF WORKING CONDITIONS AND SOCIAL DIALOGUE

The Group is committed to complying with all the legal obligations on working conditions and social dialogue and to integrating these requirements into its business model and HR strategy. This commitment, embedded in the Group's values and formalized in its Code of Conduct, aims to ensure the well-being and quality of life at work of our employees. It also contributes to the prevention of social and reputational risks likely to affect the company's overall performance.

#### 3.1.2.2. DIVERSITY AND INCLUSION POLICY TO BOOST PERFORMANCE AND RETAIN TALENT

The Group's diversity and inclusion (D&I) policy guarantees equal treatment and equal opportunities for all employees. This policy is underpinned by the Group's fundamental commitments to working conditions and social dialogue, which create the basis for an inclusive working environment respectful of differences. The Group integrates this policy into its HR and

organizational strategy to strengthen team commitment, improve collective performance and encourage talent retention. Career management, retention programs, disciplinary measures, recruitment and compensation policies are rigorously aligned with this principle of fairness, to prevent any risk of discrimination.

#### 3.1.2.3. TRAINING AND SKILLS DEVELOPMENT POLICY TO IMPROVE COMPETITIVENESS AND EMPLOYABILITY

The training and skills development policy is part of an integrated approach combining the Group's commitments on working conditions and social dialogue, the objectives of its D&I strategy, and the imperatives of its HR policy. It is a key driver for fostering employee well-being, their personal fulfillment, engagement and job satisfaction. By strengthening employability and internal occupational mobility, this policy helps to maintain and develop the strategic skills essential to the Group's competitiveness while actively contributing to attracting and retaining talent.

These policies form part of the day-to-day management of the entire workforce, ensuring implementation and constant monitoring without the need to mobilize exceptional resources. They ensure that issues related to working conditions, social dialogue, diversity and inclusion, as well as training and skills development, are fully integrated into day-to-day management practices. The Management team of each of the Group's entities ensures the

proper implementation of these policies, either directly or by delegation to the Head of Human Resources, who is responsible for the coordination, deployment and monitoring of these policies within the entities.

In view of the specific nature of their activities, the Group's industrial and technological entities (Blue and Bolloré Innovative Thin Films (ITF) and Systems) have paid particular attention to managing their strategic technical expertise. This heightened vigilance is due to the need to retain the critical expertise that is essential to industrial continuity and performance. Accordingly, the management of internal expertise and the monitoring of employee turnover are considered to be specific material issues for this division.

The fact that 96% of the Group's employees are on permanent contracts reflects the significant stability of employment at the Group (see 3.1.9. S1 metrics – section Characteristics of the company's employees [S1-6]).

### 3.1.2.4. EMPLOYEES' HEALTH AND SAFETY

The industrial and oil logistics businesses carry out their activities in environments with a potentially high risk of accidents. The stakes are particularly high when it comes to industrial activities, with factory workers exposed to health and safety risks in occupations directly linked to production (handling, assembly, passenger transport, handling and transportation of hazardous products).

Concerning the business activities of the Blue subsidiaries, the occupational risks identified at industrial sites include chemical risks, moving machine risks, cutting risks (cutting machinery, blades), electrical risks, and the risks involved with heavy parts (lifting means). Blue has also identified the materiality of risks relating to industrial accidents that could constitute a threat to the health and safety of workers. Fires or explosions can occur on battery storage sites as a result of thermal runaway if a battery overheats due to incorrect handling. This phenomenon can spread from one cell to another, amplifying the accident. The category of employees exposed to these risks refers to plant workers.

It should be noted that the main accident risks in Oil logistics activities pertain to transportation linked to the distribution of oil products. Collisions or leaving the road can lead to leaks or fires, endangering people's safety. In this respect, road carriers and drivers are the workforce category most exposed to this risk. Bolloré Energy also implements accident-prevention processes focusing on the prevention of fire hazards, particularly at oil depot sites, since the flammable nature of fuel oil and diesel fuel is triggered at very high temperatures (over 65 °C). As such, this risk concerns all depot workers.

The main risks identified with regard to the Systems division's business activities are those caused by industrial activities linked to access equipment manufacturing processes and to the risk of occupational illness (gestures and postures, training in the risks associated with the use of chemical products).

Integrating worker health and safety risks into the business model of the Group and its subsidiaries is essential to ensure sustainability, regulatory compliance and operational performance. This means treating these risks as a strategic priority and integrating them into all aspects of the organization, from decision-making to operational execution. Businesses include these issues in their health and safety commitments, and occupational risk mapping may be carried out at subsidiaries, so as to identify the risks associated with different worker categories. In 2024, 85% of entities with an industrial site had drawn up an occupational risk map. Each of the Group's businesses has its own QHSE departments and teams who implement prevention processes tailored to the risks identified through policies applying to all the members of staff who may be affected by the issues identified. Based on the appraisals of these businesses, a double CSR materiality assessment has been carried out to identify the impacts, risks and opportunities associated with the Group's health and safety challenges. The impacts identified in ESR5 S1 are considered to be systemic.

### 3.1.3. WORKING CONDITIONS AND SOCIAL DIALOGUE IN OPERATIONS

#### 3.1.3.1. POLICIES RELATED TO "WORKING CONDITIONS AND SOCIAL DIALOGUE IN OPERATIONS" (S1-1)

The "working conditions" topic covers several key sub-topics, including working time, adequate wages, social dialogue, freedom of association, collective bargaining and work-life balance.

The Group is committed to complying with all the legal obligations relating to each of these sub-topics by integrating these principles into its HR strategy. The Group has made this commitment to guarantee:

- a balanced working environment, respecting legal and contractual working hours, while maintaining a work-life balance;
- a fair and equitable compensation policy guaranteeing minimum wages consistent with current standards;

- structured and constructive social dialogue, encouraging discussions with employee representatives and the implementation of appropriate collective agreements;
- respect for freedom of association and the right to collective bargaining, to ensure responsible and transparent social governance.

By integrating these commitments into its strategy and business model, the Group contributes to preventing social risks, improving the social climate and retaining talent while strengthening its competitiveness and attractiveness.

#### POLICIES RELATED TO THE SUB-TOPIC "WORK-LIFE BALANCE"

In an increasingly connected and demanding business environment, work-life balance is a major strategic matter for employers and employees alike. The Group is committed to providing its employees with a working environment that respects this balance, considering it essential to their well-being and engagement and the company's overall performance. This commitment is reflected in a policy with three (3) key focuses:

##### Compliance with legal and regulatory obligations

The Group ensures compliance with all the legal obligations serving to guarantee a balance between professional and private life, and notably compliance with rules on working hours and rest periods, the protection of employees' right to privacy, the implementation of the right to disconnect, and the application of legal provisions on the organization of working hours and specific leave (e.g. part-time work, parental leave, leave for family events, etc.).

##### Implementing measures and best practices to promote work-life balance

The Group implements numerous measures and best practices designed to foster the work-life balance of its employees, including the negotiation of collective agreements on working hours, which guarantee sufficient rest time adapted to employees' professional constraints, and the possibility for eligible employees to work from home.

##### Developing initiatives tailored to employee needs

In addition to these global commitments, the Group encourages and implements complementary initiatives at division and entity level adapted to local conditions and employee expectations. The aim of these schemes is to enhance the quality of working life and improve the balance between professional responsibilities and personal life.

Almost all Group employees benefit from a structured scheme designed to ensure an effective work-life balance. This system is based on a collective foundation of collective agreements and internal charters adapted to the Group's various subsidiaries. These regulatory and organizational frameworks cover several essential dimensions, such as:

- working hours, with clear rules on work time and organization;
- working from home, providing greater flexibility for eligible employees;
- the right to disconnect, ensuring effective rest periods and the sensible use of digital tools;
- quality of life at work, including specific measures to improve employee well-being and prevent psychosocial risks.

The main systems implemented at the Group concern:

- Bolloré Energy: a company-wide agreement on gender equality and quality of life at work and an agreement on remote working;
- Bolloré SE: an agreement on quality of life at work and professional equality, an agreement on the introduction and conditions of remote

working for each site, a time savings account (TSA) agreement including a bonus for days off, and an agreement on the right to disconnect;

- Blue Solutions: an agreement on quality of life at work and professional equality, an agreement on remote working, a TSA agreement including a bonus for vacation days, and an agreement on the right to disconnect;
- Bluebus: an agreement on quality of life at work and professional equality, an agreement on remote working, a TSA agreement including a bonus for vacation days, and an agreement on the right to disconnect;
- IER SAS: an agreement on quality of life at work and professional equality, a remote working agreement, a flexible working hours regulation, and continued compensation during sick leave;
- Polyconseil: an agreement on quality of life at work and a remote working policy;
- Automatic Systems: family leave, flexible working hours, measures to limit the impact of commuting through a remote working policy.

#### POLICIES RELATED TO THE SUB-TOPIC "WORKING HOURS"

In addition to the commitments and policies described in the section on work-life balance, of which working hours are a key item, the Group rigorously applies legal and regulatory provisions on working hours and encourages the implementation of specific agreements and measures adapted to the realities of each subsidiary and designed to guarantee a working environment in line with best practices and local regulations:

- Bolloré Energy: an agreement on working hours, a company-wide agreement on gender equality and quality of life at work, including a rider on end-of-career part-time working, and an agreement on the introduction of remote working and the terms and conditions governing its use;
- Bolloré SE: a remote working agreement, an agreement on quality of life at work and gender equality, a TSA agreement, and an agreement on the right to disconnect;
- Bolloré SE Odet: an agreement on quality of life at work and gender equality, a TSA agreement, an agreement on the right to disconnect, specific procedures for long business trips, procedures for managing maintenance on-call duty, overtime on a voluntary basis and in compliance with annual quotas, a remote working agreement;
- Blue Solutions: a remote working agreement, specific procedures for long business trips, procedures for managing maintenance on-call duty, overtime on a voluntary basis and within annual quotas, an agreement on quality of life at work and gender equality, a TSA agreement, an agreement on the right to disconnect;

- Bluebus: a remote working agreement, specific procedures for long business trips, overtime on a voluntary basis and in compliance with annual quotas, an agreement on quality of life at work and gender equality, a TSA agreement, an agreement on the right to disconnect;
- IER, Automatic Systems: recourse to overtime or work outside normal working hours (e.g. weekend call-outs and on-call duty) on a largely voluntary basis, a period of notice to be given in the event of compulsory overtime, flexible working hours to facilitate the organization of work, the prioritization of flexitime for employees subject to timetable control, no exceeding of authorized legal limits, no exceeding of authorized legal limits in the event of compulsory overtime;
- IER: a remote working agreement, flexitime regulations, overtime or work outside normal working hours (e.g. weekend work and on-call duty) mainly on a voluntary basis, advance notice of any compulsory overtime, no exceeding of authorized legal limits, mandatory managerial approval of any overtime worked;
- Polyconseil: an agreement on quality of life at work and gender equality, a working time agreement recalling the right to disconnect.

All these agreements and internal measures illustrate the Group's determination to ensure a balanced working environment consistent with international standards and adapted to local realities. By integrating these measures into its HR strategy, the Group is fostering employee well-being and commitment, as well as the company's sustainable performance.

#### POLICIES RELATED TO THE SUB-TOPIC "PAY AND COMPENSATION POLICY"

As part of its commitment to fair compensation, the Group is aligned with the ILO Guiding Principles and the ten principles of the United Nations Global Compact, ensuring fair, equitable and non-discriminatory compensation for all employees.

In line with its Ethics and CSR Charter, the Group implements a fair and attractive wage policy adapted to local economic realities. Through this commitment, it is contributing to targets 1.1 and 1.2 of the UN Global

Compact Sustainable Development Goal 1, aimed at eradicating poverty and ensuring adequate pay for all.

The Group's compensation policy reflects the realities and pay practices of the job markets in the countries where it operates and offers the Group's employees competitive benefits, enabling them to benefit from attractive working conditions.

#### POLICIES RELATED TO THE SUB-TOPIC "SOCIAL DIALOGUE"

The Group is committed to ensuring open and constructive social dialogue in all circumstances, in line with the principles set out in its Code of Conduct. This commitment is reaffirmed in our Ethics Charter, which stresses the importance of ongoing, high-quality social dialogue with our employees.

Social dialogue is an essential pillar of the Group's HR policy. It ensures a balanced working relationship and fosters a culture of listening, consultation and negotiation between the company and its employees.

Social dialogue plays a fundamental role in the implementation of the 2030 Agenda of the Sustainable Development Goals (SDGs), as a major instrument of transformation for the company.

Social dialogue is at the heart of SDG 8: "Promote sustainable, inclusive and sustainable economic growth, full and productive employment and decent work for all". It promotes consultation and coordination between employers and employees, the creation of favorable working environments, the development of appropriate social and economic policies, and more inclusive, participative and representative decision-making processes at all levels.

Social dialogue is also a key driver of SDG 5, which aims to achieve gender equality and empower all women and girls. Social dialogue guarantees a working environment in which rights and opportunities are equitably distributed, facilitating the implementation of collective agreements and inclusive policies.

By integrating social dialogue into the heart of its governance model, the Group ensures that it meets the expectations of its employees.

## **POLICIES RELATED TO THE SUB-TOPIC “FREEDOM OF ASSOCIATION, THE EXISTENCE OF WORKS COUNCILS AND WORKERS’ RIGHTS TO INFORMATION, CONSULTATION AND PARTICIPATION”**

In line with the principles set out in its Code of Conduct, the Group actively promotes its employees’ right to freedom of expression. Freedom of association is also a fundamental principle which the Group is committed to respecting. This commitment is part of the Group’s policy on human rights and fundamental freedoms and is based on a structured framework that includes its Code of Conduct, internal regulations, employee agreements and all the Group’s fundamental texts. Where required by law, the Group sets up employee representative bodies, thus ensuring the effective exercise of the rights of employees and their representatives.

These bodies are run so as to ensure that employees are kept regularly informed, that employee representatives are consulted on strategic issues, and that social dialogue is open and constructive, which promote the active participation of employees in the decisions that concern them. By integrating these principles into its governance and internal policies, the Group is affirming its commitment to a working environment that respects fundamental rights and freedoms, thus contributing to effective and inclusive social dialogue.

## **POLICIES RELATED TO THE SUB-TOPIC “COLLECTIVE BARGAINING, INCLUDING THE PROPORTION OF THE COMPANY’S WORKFORCE COVERED BY COLLECTIVE BARGAINING AGREEMENTS”**

In accordance with its Code of Conduct, the Group guarantees regular collective bargaining procedures with qualified employee representatives. These negotiations cover key issues on working conditions, employee rights and social policy developments. The right to collective bargaining is a fundamental principle which the Group is committed to respecting. This commitment is part of a structured approach aligned with the Group’s policy on human rights and fundamental freedoms and its fundamental texts on its labor relations, notably its Code of Conduct, internal regulations, labor agreements and collective bargaining agreements in force.

The Group ensures that as many of its employees as possible are covered by collective agreements guaranteeing fair working conditions adapted to local realities.

In particular, these agreements set out the rules applicable to compensation and working conditions, career development and social protection schemes, working time arrangements and flexibility, and guarantees in terms of social dialogue and employee representation.

By integrating these principles into its governance model and HR strategy, the Group ensures a working environment that respects workers’ rights and complies with international best practices.

### **3.1.3.2. POLICIES FOR MANAGING MATERIAL IROS LINKED TO “WORKING CONDITIONS AND SOCIAL DIALOGUE (IN OPERATIONS)” (S1-1)**

A double-materiality assessment (DMA) was conducted to identify the material impacts, risks and opportunities (IROs) associated with working conditions and social dialogue (in operations). This analysis highlighted the need for the Group to guarantee the protection of workers’ rights, ensure a better work-life balance, lead a fair wage policy adapted to local economic realities, and anticipate and manage reputational risks by maintaining high-quality social dialogue and ensuring greater transparency in HR practices.

The Group’s policy on working conditions and social dialogue, as described above, takes full account of the material IROs identified in the DMA.

This approach enables the Group to anticipate and manage any significant impacts related to working conditions and social dialogue across its workforce, mitigate risks identified in the DMA by implementing prevention and continuous improvement measures, and seize every opportunity to strengthen employee commitment and improve the social climate.

## **POLICIES TO MANAGE MATERIAL IROS RELATED TO THE SUB-TOPIC “WORK-LIFE BALANCE”**

The Group believes that an imbalance between professional and private life must not under any circumstances be detrimental to the well-being of employees and their representatives.

As such, the Group and its subsidiaries implement all the legal and organizational provisions and best practices described above. These measures ensure that all employees achieve over the long term an ideal balance between their professional responsibilities and their personal lives, which is essential to their occupational well-being and engagement.

The implemented measures are monitored and assessed notably through performance reviews and professional interviews enabling direct dialogue between each employee and their manager. The Group has integrated this theme into the performance review, with a specific section (Organization of

working hours – point 1.2) dedicated to the organization and distribution of working hours, the work-life balance, the implementation of remote working (where applicable), and the effectiveness of the right to disconnect.

Employees can also request a meeting with Human Resources as part of the professional interview campaigns or, whenever they feel it is desirable, to discuss their professional situation in greater detail and explore possible solutions for adapting their working time.

In addition, collective agreements put in place to improve work-life balance are regularly monitored with employee representative bodies, through performance indicators, thus guaranteeing their effective implementation and ongoing assessment.

## **POLICIES FOR MANAGING MATERIAL IROS RELATED TO THE SUB-TOPIC “WORKING TIME”**

To protect its employees from the material negative impacts associated with working hours, the Group has implemented a comprehensive set of measures at its subsidiaries, combining a rigorous collective framework with individualized monitoring.

The Group relies on collective agreements and charters applicable within its divisions and subsidiaries, covering essential aspects such as working hours, remote working, the right to disconnect, and quality of life at work. These commitments guarantee a structured, harmonized framework to ensure compliance with legal obligations and prevent the negative impacts associated with excessive working times.

In addition to these collective measures, the Group has set up systems enabling each employee to discuss the organization of their working hours, either during the performance review or professional appraisal interview, or during any meeting they may request with the HR Department, or by alerting their manager to any overloads via the monthly activity statements (in France). Generally speaking, employees enjoy flexibility in their working hours, either because they are subject to a fixed working-day agreement or owing to the implementation of flexitime where this is possible for other employees. In addition, any overtime worked by an employee must be approved by their manager, who has been made aware of the individual risks associated with working hours, notably through performance reviews. When overtime is imposed, a reasonable period of notice is given.



#### **POLICIES FOR MANAGING MATERIAL IROS RELATED TO THE SUB-TOPIC “SOCIAL DIALOGUE”**

Social dialogue is a cornerstone of the Group's workforce policy.

The Group ensures that employee representatives are regularly informed and consulted, in particular before any final decision is taken on matters relating to working and employment conditions, as well as on those that could have an impact on employee health and safety.

In regions where the presence of independent trade unions is limited or discouraged, the Group authorizes its employees to gather independently to discuss their professional concerns. For example, during their regular working hours, employees can take part in meetings with management to discuss any legitimate subject relating to their working conditions.

In accordance with its Code of Conduct, the Group prohibits any form of pressure, exaction or conduct aimed at hindering employee expression on its behalf.

The Group often exceeds its legal obligations in terms of representing employees' interests by implementing within its divisions and according to the context enhanced practices such as paying the full cost of expert appraisals requested by its central bodies (Bolloré Central Works Council, Group Committee, European Company Joint Committee) or organizing informal courtesy meetings with employee representatives ahead of the meetings of employee representative bodies in order to facilitate understanding of the subjects discussed and optimize the quality of exchanges at such meetings. Regarding mandatory annual negotiations, for example, the Group prefers wage increases to be approved via collective agreements rather than unilaterally, via minutes of disagreement.

In addition to its legal obligations in terms of working conditions and social dialogue, the Group pursues a proactive policy of social dialogue.

For example, Bolloré Odet, Blue Solutions and Bluebus allow for a broader presence of elected representatives on the Central Works Council (CWC) and greater participation in Occupational Health and Safety Committees, with health and safety contributors appointed from among the employees. In addition, Bluebus has set up an Occupational Health and Safety Committee with no headcount requirements.

IER SAS has set up dedicated Occupational Health and Safety Committees for each site, attached to the CWC, for all issues relating to employee health and safety.

Social dialogue is also expressed through the collective agreements, and in particular the agreements on quality of life at work in force at the Group. Generally speaking, the Group promotes collective agreements and social dialogue, even over and above legal obligations. This commitment is reflected in the encouragement of collective bargaining, even when the latter is not required by law, and in the establishment of regular and transparent discussions with employee representatives, or the voluntary dissemination of information that helps to strengthen trust and cooperation within the company. At Automatic Systems, for example, this approach takes the form of open, informal discussions with employee representatives on a variety of subjects, and the proactive communication of non-mandatory information.

#### **POLICIES FOR MANAGING MATERIAL IROS LINKED TO THE SUB-TOPIC “FREEDOM OF ASSOCIATION, THE EXISTENCE OF WORKS COUNCILS AND THE INFORMATION, CONSULTATION AND PARTICIPATION RIGHTS OF WORKERS”**

The Group is committed to guaranteeing and respecting employees' fundamental rights, in particular freedom of association and the right to information, consultation and participation.

In accordance with its Code of Conduct, the Group proscribes any form of pressure, exaction or conduct, when exercised in its name, aimed at distorting or hindering employee expression. The Group's strict respect of this policy is illustrated in the fact that it has not been convicted of any illegal interference.

In regions where the presence of independent trade unions is limited or discouraged, the Group allows its employees to gather independently to discuss their professional concerns. For example, during their regular working hours, employees can take part in meetings with management to discuss any legitimate subject relating to their working conditions.

Employee representatives are never discriminated against in the exercise of their mandates, and the management of entities is committed to fair and honest dealings with them. They are informed, and even consulted, whenever a project has a concrete impact on the working or employment conditions of employees.

The Group Code of Conduct distributed to all Group entities emphasizes that the Group guarantees freedom of association, the rights of employees and their representatives, and the application of the principles of social dialogue in all Group subsidiaries and that an ethics line reporting to the Group Human Resources Department can be used to report any breaches of these principles.

#### **POLICIES FOR MANAGING MATERIAL IROS LINKED TO THE SUB-TOPIC “COLLECTIVE BARGAINING, INCLUDING THE RATE OF WORKERS COVERED BY COLLECTIVE AGREEMENTS”**

The Group is committed to maintaining a structured and constructive social dialogue with its social partners, ensuring that compulsory collective bargaining is systematically practiced and that it forms part of a continuous improvement process for the working conditions and the situation of employees.

In France, all companies with more than 50 employees and union representation are covered by employee savings agreements. Almost all employees are covered by a collective bargaining agreement (see DR S1-8, chapter 3.1.9. S1 Metrics).

For entities that owing to their size do not legally have an employee representative body, the Group enables partial compliance with the provisions of the collective bargaining agreement and respect for certain professional branch rules, as is the case at Automatic Systems and Iris Immobilier, in line with the Group's commitments in this area, and at Bolloré Energy, which extends mandatory annual negotiations measures to employees of subsidiaries lacking these negotiations owing to their size.

#### **3.1.3.3. TARGETS – TARGETS FOR POLICIES FOR MANAGING MATERIAL IROS RELATED TO THE TOPIC “WORKING CONDITIONS AND SOCIAL DIALOGUE (IN OPERATIONS)” (S1-5)**

To ensure compliance with its commitments on working conditions and social dialogue, the Group has defined targets for 2025 as part of its policies linked to the material IROs identified by the double-materiality assessment. The targets selected for the “working conditions and social dialogue” topic as a whole apply to the entire scope of the Group's activities, thus guaranteeing a global and harmonized approach.

The targets set for the “work-life balance” and “collective bargaining” sub topics apply in France, the sole scope concerned by the measures to which they refer.

As the policies implemented are closely interconnected, achieving these targets will ensure the coherent and cross-cutting management of the material IROs identified in this area.

The targets were determined jointly by the Group Human Resources Department and the Human Resources Departments of the various Group divisions. By setting these targets, the Group is monitoring its commitments and ensuring compliance with best practices in working conditions and social dialogue.

## TARGETS RELATING TO THE ENTIRE “WORKING CONDITIONS AND SOCIAL DIALOGUE” TOPIC

### 1. 80% of employees aware of the Code of Conduct

This target ensures that the workforce is fully aware of the existence of the Code of Conduct and its content. Employees are informed of the existence of the Code of Conduct as soon as they join the Group and are reminded of its existence throughout their professional careers, notably as part of performance reviews and awareness-raising campaigns or when reference is made to the Code of Conduct in internal and external documents, including posters displaying information on subjects covered by the Code of Conduct.

This target applies to the entire scope of the Group's activities and to all its employees, guaranteeing a global and harmonized approach.

The achievement of targets is monitored by comparing the formalization of the handover of the Code of Conduct to employees taking up their duties with performance reviews, during which employees are asked about their awareness of the Code of Conduct.

### 2. ≥ 80% of employees from sensitive populations trained in the Code of Conduct

Training for populations defined as sensitive by the Compliance Department strengthens the respect of ethical commitments, the application of best practices, and the effective implementation of commitments and policies. The Group will use a tool to monitor the achievement of this target.

### 3. Zero convictions for non-compliance with legal obligations regarding social dialogue

This objective helps to ensure that the social dialogue policy is effectively implemented and that teams are committed to this goal. Compliance with legal obligations avoids convictions and guarantees social dialogue. This objective will be monitored by the Group's Industrial Relations Department as part of its mission to support and monitor the various divisions. Reporting has been set up for this purpose.

### 4. 100% of alerts sent to the Human Resources Department via the “alert.bolloré.com” alert system concerning the commitments of the Code of Conduct or charters are processed within three months.

This target ensures that alerts are processed rapidly via the whistleblowing system. This short processing time ensures swift action. The achievement of this target is monitored via the whistleblowing system.

## TARGET FOR THE “WORK-LIFE BALANCE” SUB-TOPIC

### 100% of negotiations initiated in 2025 for the renewal of agreements on quality of life at work expiring in 2025.

The target set by the Group strengthens the implementation of agreements on quality of life at work and demonstrates the Group's commitment to

implementing this type of agreement. This objective will be monitored by the Group's Industrial Relations Department as part of its mission to support and monitor the various divisions. Reporting has been set up for this purpose.

## TARGET FOR THE “COLLECTIVE BARGAINING” SUB-TOPIC

### 100% of written requests to open mandatory collective bargaining initiated within legal deadlines (France).

Respecting collective bargaining deadlines ensures a stable labor framework and helps to structure social dialogue. This objective will be monitored by the

Group's Industrial Relations Department as part of its mission to support and monitor the various divisions. Reporting has been set up for this purpose.

## 3.1.3.4. MEASURES TO RESPOND TO MATERIAL IROS RELATED TO THE TOPIC “WORKING CONDITIONS AND SOCIAL DIALOGUE (IN OPERATIONS)” (S1-4)

The Group is implementing a series of concrete actions to achieve its strategic targets and respond to the material IROs identified in terms of working conditions and social dialogue.

As the policies implemented are closely interconnected, the actions implemented specifically under one sub-topic may also contribute to other related areas.

The Group ensures that its commitments in terms of working conditions and social dialogue are respected in order to guarantee a business environment that is compliant, inclusive and in line with best practices. To that end, it leads a strategy combining awareness-raising, support, and rigorous monitoring.

The Group's fundamental principles on working conditions and social dialogue are enshrined in its Code of Conduct and internal charters. These documents are more than just directives; they structure the daily work of our teams and guide their conduct.

Every employee is made aware of the Group's values and commitments, and regular communication ensures that the whistleblowing and whistleblower protection systems are disseminated and understood, guaranteeing an ethical and secure working environment.

The Code of Conduct clearly stipulates that anyone contravening its principles is liable to disciplinary action or legal prosecution, in accordance with applicable law.

The Group's ongoing training program ensures that all employees have a solid understanding of the fundamental principles with which they are expected to comply (see 3.1.5.2. Training and skills development). From the moment they join the company, and throughout their professional career in the Group, they benefit from bespoke training sessions to deepen their understanding of the Group's workforce commitments. This approach encourages compliance with the principles of the Code of Conduct and charters while firmly embedding them in daily practices.

The Group has set up a whistleblowing system (see 3.1.7. Whistleblowing system and remediation process) to ensure that its commitments on working conditions and social dialogue are fully effective and make sure that any anomalies are dealt with quickly and effectively. The secure reporting system is accessible to all employees, enabling them to report any problematic situation, and the Group undertakes to process each alert promptly, ensuring rigorous follow-up and implementing appropriate corrective measures. The Group undertakes to ensure that alerts sent to the HR Department via the “alert.bolloré.com” system concerning the commitments of the Code of Conduct or internal charters are processed within a maximum of three months.

The Group supports its subsidiaries in implementing their commitments, particularly in the areas of working conditions and social dialogue, by introducing tools and best practices to respond to local realities and facilitate the application of regulations and international standards, thus guaranteeing consistency and optimum compliance at all levels of the organization.

Measures are also taken to address matters such as working hours, compensation, work-life balance and social dialogue. The effectiveness of these actions is regularly measured as part of social dialogue and strategic adjustments are made where necessary to ensure that targets are met.

Individual monitoring of the proper implementation of Group policies is also ensured via the annual performance reviews and professional interviews, during which employees can express their views on working conditions as well as their expectations and concerns. These interviews also enable the company to analyze the quality of social dialogue, identify any areas for improvement, and enhance well-being in the workplace.

All the measures implemented, described in the following paragraphs relating to the various ESRS sub-topics, also help to prevent social risks, improve the social climate and retain talent at the Group's various divisions, while boosting the Group's competitiveness and attractiveness.

#### MEASURES IN RESPONSE TO MATERIAL IROS RELATED TO THE “WORK-LIFE BALANCE” SUB-TOPIC

The Group places work-life balance at the heart of its commitments, convinced that employee well-being is a key driver of performance and commitment. Over and above strict compliance with legal requirements, the Group implements a proactive policy of listening, adapting and continuously improving working conditions, and responding to the specific needs of its employees.

In all its subsidiaries, the Group makes sure that annual performance reviews and professional interviews are a privileged moment of dialogue for employees and their managers. These interviews help to identify any imbalances and implement appropriate solutions. When an employee expresses difficulties with their workload or work organization, adjustments can be made to ensure a better work-life balance. During the performance review, the employee and manager discuss the organization of working time, taking stock of the employee's workload, the organization of the employee's working time at the company, their work-life balance, and the exercise of the right to disconnect.

As part of its approach to individual support, the Group has set up an enhanced individual support program in the divisions providing access to appropriate healthcare services. At some entities, including at the Puteaux and Suresnes sites, these services are directly accessible on site, with the presence of an occupational physician, nurse, psychologist and social worker intervening on a regular basis. At other establishments, the Group guarantees equivalent access through partner external healthcare services. The Group also organizes employee coaching programs with internal or external consultants.

At entities benefiting from agreements on quality of life at work, a series of measures is deployed within the framework of the agreement itself to ensure that these commitments are translated into concrete action. At the other entities, the systems put in place are part of the social dialogue policy. Specific measures have been taken to create a working environment where all employees can achieve their full potential in the divisions.

At Bolloré Energy, the creation of a Gender Equality and Quality of Life at Work Commission is helping to structure dialogue between employees and management on these crucial issues. Loyalty-building initiatives, such as executive seminars held every two or three years, strengthen the sense of belonging. The integration of new employees is also a key concern, with a structured induction program that includes a meeting with the manager, an introduction to the company's businesses, the presentation of corporate goodies, and targeted training.

At IER SAS, the quality of life at work initiative takes various forms. HR coffee sessions inform employees and answer their questions, special quality of life at work weeks are organized to raise team awareness, and a structured integration package is offered to new recruits. In addition, post-departure interviews are conducted systematically to understand the motivations of departing employees and identify possible areas for improvement.

At Bolloré Puteaux, an induction program has also been set up for new employees, including a presentation of the Group, the services available at the tower, and an introduction to certain Departments (notably Patronage, CSR and Compliance). New arrivals are supported by the HR Department through interviews. This approach has been extended to other subsidiaries, including Iris Immobilier. A leaving interview is systematically organized with departing employees to analyze the reasons and plan any corrective measures, particularly with regard to working conditions and work-life balance.

At Bolloré SE Odet, Blue Solutions and Bluebus, each new employee benefits from an individual integration program co-developed by the HR Department and the manager. An HR interview is systematically offered to executives and managers in their first few months of work, along with a “fresh eyes” report. Customized support can be provided to future employees that have to relocate their family. In addition, post-departure interviews are systematically conducted to understand the motivations of departing employees and identify possible areas for improvement.

#### MEASURES IN RESPONSE TO MATERIAL IROS RELATED TO THE “WORKING TIME” SUB-TOPIC

In addition to global initiatives on working conditions and social dialogue, the Group has developed specific measures to address working-time issues, prevent risks, and adjust practices where necessary.

The Group pays particular attention to collective agreements on working time and ensures that they remain in line with employee needs. When the application of these agreements no longer guarantees a healthy and balanced working environment, a revision is envisaged in consultation with the social partners.

To ensure effective monitoring, working time control indicators are implemented to monitor changes in working time and adjust practices accordingly. Individualized monitoring to detect and correct imbalances has also been introduced, notably via the annual performance reviews and professional interviews, which include a discussion of work organization with each employee. They enable managers to detect any signs of work overload and suggest customized adjustments.

In addition, our agreements implemented on quality of life at work include specific measures on the management of working hours, strengthening the Group's commitment to a more flexible working environment tailored to individual needs.

Each Group entity has its own monitoring system, with regular reminders of the legal limits and best practices to be observed, both for managers and employees. This monitoring ensures the balanced management of working time, avoiding any drift that could affect employees' health. Strict control over the use of overtime is exercised in particular by HR teams, who closely monitor the number of hours worked.

The Group encourages its various entities to take targeted initiatives to ensure that working hours are properly organized and monitored. Bolloré Energy has rolled out several initiatives in this spirit, including an internal memo setting out the rules and exceptions applicable to working hours, an overtime monitoring tool for analyzing workload distribution in real time, awareness-raising campaigns on the impact of overtime on employee health to encourage a more balanced management of working hours, and the possibility for certain employees to benefit from a part-time scheme towards the end of their career, enabling them to gradually reduce their workload.

At IER SAS, managers and employees are regularly informed of the need to respect work schedules and workloads, while employees nearing the end of their careers can benefit from a part-time scheme enabling them to gradually reduce their workload.

The time savings account (TSA) agreements of Bolloré SE Odet, Blue Solutions and Bluebus include a bonus for vacation days for employees on alternating shifts.

## MEASURES IN RESPONSE TO MATERIAL IROS RELATED TO THE “SOCIAL DIALOGUE” SUB-TOPIC

In addition to its global initiatives on working conditions and social dialogue, the Group implements specific measures to ensure dynamic and constructive social dialogue in line with the best practices.

The Group is supported by an Industrial Relations Department tasked with ensuring the quality of social dialogue and harnessing it to boost social performance. This department plays a key role in supporting mandatory annual negotiations and discussions on gender equality in the workplace, in line with Sustainable Development Goals 5 and 8. Where an IRO is identified, the Industrial Relations Department, working together with other Group functions, intervenes to redirect social dialogue and ensure that it remains a vehicle for the continuous improvement of working conditions.

Through HR and operational correspondents in all subsidiaries, the Group is able to provide local support for social dialogue, enabling it to anticipate and support employees' needs on the ground. At the same time, any alerts or observations issued by labor authorities are dealt with rigorously and responsively to ensure compliance with the applicable legal and regulatory provisions.

The Human Resources teams remain available for any requests from employees or their representatives, thus fostering a climate of open and constructive dialogue. Follow-up measures are implemented to assess the fluidity of social dialogue. The Group's various divisions implement best practices adapted to their specific realities, helping to strengthen social dialogue at each entity. At Bolloré Bretagne, for example, a weekly HR hotline is organized at industrial sites, enabling direct contact with employees; local information meetings are organized by field managers, fostering daily dialogue; employee representatives are systematically invited to ceremonial events (inaugurations, celebrations, etc.) and discussions are organized with management to review the company's strategy, boosting transparency and team involvement.

Bolloré Energy, for example, fully covers the expenses of experts appointed by the Central Works Council, facilitates and reimburses some of the costs of travel by employee representatives; accepts the presence of elected representatives at meetings on quality of life at work held annually in each department or branch; and provides elected representatives with information that is not legally required, thereby enhancing their understanding of strategic issues.

## MEASURES IN RESPONSE TO MATERIAL IROS LINKED TO THE “FREEDOM OF ASSOCIATION” SUB-TOPIC

In addition to the global measures taken as part of the “working conditions and social dialogue” topic, the Group and its divisions are committed to guaranteeing freedom of association by promoting structured social dialogue that respects employees' rights.

To that end, the Group endeavors to maintain regular mandatory negotiations. This approach also ensures that the collective status of employees is constantly adapted to keep pace with changing social and regulatory issues.

## MEASURES IN RESPONSE TO MATERIAL IROS RELATED TO THE “COLLECTIVE BARGAINING” SUB-TOPIC

To ensure effective and structured social dialogue, the Group is committed to respecting and strengthening collective bargaining practices, taking into account the needs and interests of employees.

The Group is committed to respecting legal deadlines for collective bargaining, thus ensuring regular consultation in line with regulatory obligations, and the adaptability of collective agreements, enabling them to be revised where necessary.

Through HR and operational correspondents in all subsidiaries, the Group is able to adjust and adapt the collective framework according to the specificities and expectations of employees, including as part of a collective approach.

A permanent regulatory watch is organized to ensure compliance with employee rights, particularly with regard to regulations on compensation and benefits, with the support of specialized bodies (law firms, payroll service providers, etc.), and to guarantee the optimum compliance of pay practices with changes in legislation and collective bargaining agreements.

## 3.1.4. DIVERSITY, EQUITY AND INCLUSION IN OPERATIONS

### 3.1.4.1. POLICIES RELATED TO THE TOPIC “DIVERSITY, EQUITY AND INCLUSION IN OPERATIONS” (S1-1)

The “equal treatment and equal opportunities for all” topic, has been renamed “diversity, equity and inclusion in operations” during the double-materiality assessment.

As part of our sustainability report, this topic encompasses several key sub-topics, namely “gender equality and equal pay for work of equal value”, “employment and inclusion of persons with disabilities”, “measures against violence and harassment in the workplace” and “diversity”.

In addition, the “training and skills development” sub-topic is dealt with independently in a specific section, owing to its strategic importance and cross-cutting impact on all employees.

In its Code of Conduct, the Bolloré Group reaffirms its commitment to ensuring equal opportunities for recruitment, employment, personal and professional development and promotion. The Group is committed to promoting diversity in the workplace, professional gender equality, the professional integration of young people, and the employability of seniors.

The Code of Conduct prohibits all discriminatory comments and practices based on origin, gender, marital status, pregnancy, physical appearance, surname, state of health, disability, sexual orientation, age, political opinions, union activities, membership of a particular ethnic group or religion for any person acting on behalf of the Bolloré Group.

In its Ethics and CSR Charter, the Group undertakes to guarantee recruitment and development processes that promote equal opportunities, to combat all forms of harassment and discrimination, and to act in favor of inclusion and diversity, to deploy measures in favor of gender equality, and to promote the employment and integration of people with disabilities.

The Group sets out its commitments in the context of the UN SDGs, and in particular SDG 5.5 (“Ensure women's full and effective participation and equal opportunities for leadership at all levels of decision-making in political, economic and public life”), SDG 8.5 (“Achieve full and productive employment and decent work for all women and men, including for young people and persons with disabilities, and equal pay for work of equal value”) and SDG 10.2 (“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”).

In its Diversity and Inclusion Charter, the Bolloré Group has formalized the ambitions, approaches and resources it intends to implement in terms of fighting against discrimination, promoting gender equality, welcoming and integrating people with disabilities, and integrating young people into the workforce.

The Charter complies with ILO conventions and is in line with the UN SDGs.

The Group's anti-discrimination policies are aimed at eliminating all forms of discrimination in employment and occupation, particularly with regard to recruitment, remuneration, working hours and rest periods, paid leave, maternity protection, job security, assignments, performance appraisals and promotions, training opportunities, promotion prospects, occupational health and safety, and termination of employment.

The Bolloré Group implements its policy of equal treatment and equal opportunities for all employees through the application of its Diversity and Inclusion Charter.

The implementation of the Diversity and Inclusion Charter covers all stages of the employee life cycle, including recruitment, promotion, occupational mobility and training.

To combat discrimination while promoting skills and equal opportunities, and to guarantee a fair and inclusive working environment that respects differences, the Group is working to optimize recruitment so as to encourage a diversity of applicants. The “non-discrimination” theme into multi-entity management training courses will be integrated from 2025 onwards and will also contribute to achieving the objective on equitable promotion.

To foster gender equality in the workplace, the Group aims to increase the number of women in under-represented professions by promoting female candidates with equal skills and enable women to access positions of responsibility, notably by selecting more women for management training programs. The commitments expressed at Group level are implemented across each division, the latter being responsible for implementing this policy while taking into account the specific features of its business lines, the aim being to ensure consistent and sustainable development.

For each theme, each division implements systems and tools to assess the situation, draw up action plans and monitor indicators.

The Group’s policy on equity and inclusion is a global approach that brings into play all the policies related to the sub-topics of “gender equality and equal pay for work of equal value”, “employment and inclusion of persons with disabilities”, “measures against violence and harassment in the workplace” and “diversity”. The policies implemented for each sub-topic thus form part of a global and coherent approach in which each initiative contributes to reinforcing the others. This interconnection serves to effectively promote diversity and build an inclusive working environment, guaranteeing equal opportunities to all employees and respect for differences. The policies implemented for each of the sub-topics interact and reinforce each other to promote diversity and inclusion.

The Group’s diversity and inclusion policy is based in part on its fundamental commitments to working conditions and social dialogue, which create the foundation for an inclusive working environment respectful of differences.

#### **POLICIES RELATED TO THE SUB-TOPIC “DIVERSITY”**

Diversity is central to the Group’s HR policy, which is committed to creating an inclusive and equitable working environment in which each individual can develop freely and contribute fully to collective success.

The Group ensures that every employee, benefits from the same opportunities throughout their career.

The Group does everything in its power to guarantee fair access to employment, offer all employees the same opportunities for professional development and advancement, ensure fair and transparent promotion, and apply a fair compensation policy.

Particular attention is paid to certain groups at greater risk of inequality, including women, young people, older employees, and people with disabilities, whether visible or invisible.

The Group’s divisions implement specific schemes through collective agreements or dedicated measures, contributing directly or indirectly to the promotion of diversity and equal opportunity.

For example, at Bolloré Energy, a company-wide agreement on gender equality and quality of life at work has been put in place, incorporating measures to ensure a more inclusive and equitable working environment. Among the commitments of this agreement are the recognition of periods of unavailability as actual working time (in particular for the determination of

rights linked to seniority, the distribution of profit-sharing and incentive schemes, the calculation of paid leave and a thirteenth month wage, the application of collective measures resulting from mandatory annual negotiations), specific arrangements for employees concerned by parenthood (the arrangement of working hours for pregnant women (one [1] hour of reduction per day), leave of absence for compulsory medical examinations, guaranteed salary progression in the event of maternity or adoption leave, time dedicated to breast-feeding in the workplace, departure and return interviews for employees on parental leave, sick-child days allocated to parents, back-to-school measures for parents), the organization of meetings between 8 a.m. and 6 p.m. to help reconcile professional and personal life, and a system for donating rest days. In addition, as part of the 2025 agreement on mandatory annual negotiations, a dedicated budget has been earmarked to further boost measures in favor of gender equality.

At Bolloré SE Puteaux and Odet, Blue Solutions and Bluebus, these measures are illustrated, in particular, through the quality of life at work and gender equality agreement, which includes measures on fair treatment between women and men, parenthood (flexible working hours for pregnant women, sick leave for children), and the remote working agreement, which provides a more flexible framework for pregnant women and young parents.

#### **POLICIES RELATED TO THE SUB-TOPIC “GENDER EQUALITY AND EQUAL PAY FOR WORK OF EQUAL VALUE”**

The Group implements processes to promote equal opportunities and measures to foster gender equality. The Group is reaffirming its commitment to gender equality in the workplace through its Diversity and Inclusion Charter, guaranteeing practices in line with the best international standards. The Group promotes professional gender equality and equal pay for work of equal value to ensure fair compensation for equal levels of skills, seniority and position (in accordance with ILO convention 100 on equal pay). To that end, the Group applies the principle of “equal pay for work of equal value” consistent with ILO convention 100 on equal pay, through appropriate salary transparency mechanisms.

In addition to compensation, the Group implements an equitable career development and promotion policy to ensure that each employee’s career development is commensurate with their aptitudes and aspirations. The

Group has introduced specific company agreements on gender equality and equal pay for work of equal value at the subsidiaries of its various divisions (Bolloré Energy, Blue Solutions, Bluebus, Bolloré SE, IER, Automatic Systems). These agreements guarantee employees a structured and formalized framework and ensure real equity in terms of opportunities and remuneration.

For subsidiaries that have not formalized specific agreements on these subjects, the Group’s commitments to diversity, inclusion and labor rights ensure that the fundamental principles of equal opportunity and equal pay are applied to all employees.

Through this approach, the Group ensures that every employee, regardless of their entity or location, benefits from the same guarantees on fairness, career development and salary recognition.



## **POLICIES RELATED TO THE SUB-TOPIC “MEASURES AGAINST VIOLENCE AND HARASSMENT IN THE WORKPLACE”**

The Group has a zero-tolerance policy towards any form of violence, harassment or discrimination in the workplace and ensures that its principles are applied at all levels of the organization.

This commitment is in line with our core values, Code of Conduct and internal charters. It guarantees a safe and inclusive working environment respectful of differences for all our employees.

The Code of Conduct recalling appropriate behavior in the workplace, distributed to all Group employees, explicitly rejects any form of moral or sexual harassment, as well as any form of violence at the company. This strong position is in line with current laws and regulations and reflects our corporate culture based on respect and equal treatment.

The Group has set up a structured system for preventing, reporting and processing any situation of harassment or violence, thus guaranteeing rapid and effective action. At Bolloré Energy, regular training and awareness-raising activities are organized for employees and managers to help them identify and prevent inappropriate conduct. A culture of dialogue and prevention encourages employees to speak out and report any abnormal situation in their working environment without fear. A secure reporting system, accessible to all employees, makes it possible to report any situation of concern in complete confidentiality, and procedures are in place to deal with any reports and punish any conduct contrary to the Group's values.

At IER SAS, a charter for good relations in the workplace has been drawn up by employees and shared with all staff.

## **POLICY RELATED TO THE SUB-TOPIC “EMPLOYMENT AND INCLUSION OF PERSONS WITH DISABILITIES”**

In its Charter for Diversity and Inclusion, the Group affirms its commitment to promoting access to employment and the long-term integration of people with disabilities. This commitment goes beyond legal obligations by considering the inclusion of people with disabilities as a powerful driver of social cohesion and collective enrichment at the company.

In its Ethics and CSR Charter, the Group guarantees fair recruitment and development processes that give every candidate, regardless of their situation, the same opportunities for access to employment and professional advancement. This commitment fully applies to people with disabilities, ensuring that no discrimination hinders their career development.

In addition, the whistleblowing mechanisms in place enable any employee to quickly report any situation of discrimination, including those related to disability, to ensure a rapid and effective response. Where possible, the Group endeavors to adapt job profiles to optimize the recruitment of people with disabilities and to create an accessible and inclusive working environment by implementing specific arrangements to facilitate their integration and career development.

At IER SAS, a disability correspondent has been appointed to raise awareness among all employees of visible and invisible disabilities and to support employees in their efforts to obtain recognition as disabled workers.

### **3.1.4.2. POLICIES FOR MANAGING MATERIAL IROS RELATED TO “DIVERSITY, EQUITY AND INCLUSION IN OPERATIONS” (S1-1)**

A double-materiality assessment (DMA) was carried out to identify the material IROs related to the topic of “diversity, equity and inclusion in operations”. This analysis highlights the benefits of an effective policy on inclusion, as well as the social and financial risks of failing to take sufficient account of these issues.

The Group leads an active diversity and inclusion policy that guarantees equal treatment and equal opportunities for all employees. This policy is based in part on the Group's policies on working conditions and social dialogue, which lay the foundations for a respectful and inclusive working environment. The Group integrates this policy into its HR and organizational strategy to strengthen team commitment, improve collective performance and encourage talent retention. Career management, retention programs, disciplinary measures, recruitment and compensation policies are rigorously aligned with this principle of fairness, to prevent any risk of discrimination.

The Group's diversity and inclusion policy aims to protect employees against any risk of discrimination. All the measures deployed to promote diversity, equity and inclusion contribute to well-being in the workplace, employee commitment and team performance, and, hence, to talent retention.

The Group's diversity and inclusion commitments are set out in its Code of Conduct, Ethics and CSR Charter and Diversity and Inclusion Charter. These documents form the basis of the Group's approach. They are approved and signed by General Management and the Group's Ethic – CSR and Anticorruption Committee, representing a strong commitment at the highest level of the organization.

The provisions of the Code of Conduct and the charters apply to the Group as a whole, to subsidiaries over which the Group exercises majority control, in accordance with French legislation, and to all the employees of these subsidiaries, guaranteeing the uniform application of diversity and inclusion commitments.

The Group's diversity and inclusion policy takes into account the material IROs identified as material during the double-materiality assessment (DMA), and the implementation of the policy makes it possible to manage any IROs identified by the DMA.

Respecting the principles and commitments set out in these documents is the Group's principal guarantee of compliance with its obligations in terms of diversity, inclusion and equal opportunities.

The Code of Conduct clearly states that any breach of its principles may result in disciplinary action or legal proceedings, in accordance with the applicable legal framework. This rigorous approach guarantees zero tolerance of any conduct running counter to the Group's values, particularly in terms of diversity, inclusion and equal opportunities.

The Group's policies on working conditions and social dialogue, and more specifically the policies implemented to manage IROs relating to diversity, equity and inclusion, ensure the dissemination of the Group's commitments, compliance with legal obligations in terms of labor law and social dialogue, awareness of and familiarity with the whistleblowing system, and the implementation of measures that strengthen policies for managing material IROs related to diversity and inclusion.

The Group considers training and skills development as a vital component of the measures taken to combat all forms of discrimination and ensure diversity, equal opportunities and inclusion.

As part of its overall commitment to diversity and inclusion, the Group also implements specific policies to prevent risks and promote equal opportunities for all employees. Though they target sub-topics, these policies are part of a global and coherent approach in which each initiative serves to strengthen the others and thus ensure a more inclusive working environment.

#### SPECIFIC POLICIES FOR MANAGING MATERIAL IROS RELATED TO THE “DIVERSITY” SUB-TOPIC

Agreements on professional gender equality are regularly negotiated at French subsidiaries with at least 50 employees and a union.

These agreements guarantee a structured framework for real equality in terms of access to professional, compensation and career development opportunities and foster gender diversity and inclusion by reinforcing the balance of professional representation.

Bolloré SE, Bolloré Energy, IER SAS, Blue Solutions, Polyconseil and Bluebus have implemented specific agreements on professional gender equality.

In France, the Group closely monitors the indicators used to calculate professional equality indicators, with a majority scoring 85 points or more and all scoring at least 75 points.

#### SPECIFIC POLICIES FOR MANAGING MATERIAL IROS RELATED TO THE “GENDER EQUALITY AND EQUAL PAY FOR WORK OF EQUAL VALUE” SUB-TOPIC

Agreements on professional gender equality are regularly negotiated at French subsidiaries with at least 50 employees and a union in order to ensure real gender equality.

These agreements guarantee a structured framework for equality in terms of access to professional, compensation and career development opportunities. Bolloré SE, Bolloré Energy, IER SAS, Blue Solutions, Polyconseil and Bluebus have implemented specific agreements on professional gender equality.

Regarding compensation, some subsidiaries (Bolloré SE, Iris Immobilier, Mac Mahon, Domaine de la Croix) provide managers with decision-making

aids (in the form of statistics when determining the compensation of their employees) to help them make gender-equitable choices.

In France, the Group closely monitors the indicators used to calculate professional equality indicators, with a majority scoring 85 points or more and all scoring at least 75 points. In environments not requiring the implementation of a measurement indicator, the divisions ask their subsidiaries to establish an indicator in line with the standards of the country's local authorities so that they can identify any situations calling for adjustments.

#### SPECIFIC POLICIES FOR MANAGING MATERIAL IROS RELATED TO THE “EMPLOYMENT AND INCLUSION OF PERSONS WITH DISABILITIES” SUB-TOPIC

The Group encourages its divisions in all the steps they take to promote the employment of people with disabilities.

The policies to promote the employment of people with disabilities involve raising employees' awareness (distribution of booklets, poster campaigns,

workshops for employees in certain entities, intranet communication, etc.) of disabilities, training HR teams in charge of recruitment and managers in the integration of people with disabilities, and adapting premises to ensure accessibility for employees with disabilities.

#### 3.1.4.3. TARGETS – TARGETS FOR POLICIES FOR MANAGING MATERIAL IROS RELATED TO THE TOPIC “DIVERSITY, EQUITY AND INCLUSION IN OPERATIONS” (S1-5)

To ensure compliance with its commitments on diversity, equality and inclusion, the Group has defined targets for 2025 as part of its policies linked to the material IROs identified by the double-materiality assessment.

The targets were determined jointly by the Group Human Resources Department and the Human Resources Departments of the various Group divisions. The targets set for diversity, equity and inclusion as a whole and for the “employment and inclusion of persons with disabilities” sub-topic apply to the entire scope of the Group's business activities, thus guaranteeing a global and harmonized approach.

The target set for the “gender equality and equal pay for work of equal value” sub-topic applies in France, the sole scope concerned by the measures to which they refer, covering more than 75% of the workforce.

As the policies implemented are closely interconnected, achieving these targets will ensure the consistent and cross-functional management of the material IROs identified for this topic in the DMA.

By setting these targets, the Group is monitoring its commitments to diversity, equity and inclusion.

#### TARGETS RELATED TO THE “DIVERSITY, EQUITY AND INCLUSION IN OPERATIONS” TOPIC AS A WHOLE

##### ≥ 80% of employees informed of the existence of the Code of Conduct

This target ensures that the workforce is fully aware of the existence of the Code of Conduct and its content. Employees are informed of the existence of the Code of Conduct as soon as they join the Group and are reminded of its existence throughout their professional careers, notably as part of performance reviews and awareness-raising campaigns or when reference is made to the Code of Conduct in internal and external documents, including posters displaying information on subjects covered by the Code of Conduct.

This target applies to the entire scope of the Group's activities and to all its employees, guaranteeing a global and harmonized approach.

The achievement of targets is monitored by comparing the formalization of the handover of the Code of Conduct to employees taking up their duties with performance reviews, during which employees are asked about their awareness of the Code of Conduct.

##### ≥ 80% of employees from sensitive populations trained in the Code of Conduct

Training for populations defined as sensitive by the Compliance Department strengthens the respect of ethical commitments, the application of best practices, and the effective implementation of commitments and policies. The Group will use a tool to monitor the achievement of this target.

**100% of alerts sent to the Human Resources Department via the “alert.bolloré.com” alert system concerning the commitments of the Code of Conduct or internal charters are processed within three months.**

This target ensures that alerts are processed rapidly via the whistleblowing system. This short processing time ensures swift action. The achievement of this target is monitored via the whistleblowing system.



#### TARGET RELATED TO THE “GENDER EQUALITY AND EQUAL PAY FOR WORK OF EQUAL VALUE” SUB-TOPIC

##### **Gender equality indicator ≥75 points for all subsidiaries covered by this indicator (France)**

This target relates to the Group's policy on gender equality and equal pay for work of equal value.

By setting a minimum level for the professional gender equality indicator of 75 points, the Group ensures that its subsidiaries are engaged in implementing

its policy in favor of gender equality in the workplace and equal pay for work of equal value. This target is also linked to the Group's policy of promoting women to positions of responsibility.

The achievement of the target is monitored annually on the publication of the indicator, which is calculated in accordance with French law.

#### TARGET RELATED TO THE “EMPLOYMENT AND INCLUSION OF PERSONS WITH DISABILITIES” SUB-TOPIC

##### **≥ 80% of HR staff aware of the issue of employment and inclusion of persons with disabilities**

Raising awareness among HR staff promotes an inclusive policy accessible to all, as staff are at the forefront of issues relating to the inclusion of people with disabilities (recruitment, implementation of HR policies, etc.).

The achievement of this target will be monitored by a Group-wide monitoring tool, which will consolidate information on the measures taken by the various divisions.

#### **3.1.4.4. MEASURES TO RESPOND TO MATERIAL IROS RELATED TO THE TOPIC “DIVERSITY, EQUITY AND INCLUSION IN OPERATIONS” (S1-4)**

The measures implemented as part of the management of material IROS related to working conditions and social dialogue (described in the paragraph relating to this topic) play a fundamental role in the management of material IROS related to diversity, equity and inclusion because they guarantee an inclusive professional environment that complies with all legal obligations relating to employees' working conditions after inclusion.

The Group is also implementing a series of actions to achieve its strategic targets in response to the material IROS identified in the areas of diversity, equity and inclusion during the double-materiality assessment.

As the policies implemented are closely interconnected, the actions implemented under one sub-topic may also contribute to other related areas.

The Group's strategy combines awareness raising, support and rigorous monitoring to guarantee an inclusive business environment that is in compliance with its commitments and aligned with best practices.

The Group's fundamental principles of diversity, equity and inclusion are enshrined in its Code of Conduct and internal charters. These documents are more than just directives; they structure the daily work of our teams and guide their conduct. Every employee is made aware of the Group's values and commitments, and regular communication ensures that the whistleblowing and whistleblower protection systems are disseminated and understood, guaranteeing an ethical and secure working environment.

The Code of Conduct clearly stipulates that anyone contravening its principles is liable to disciplinary action or legal prosecution, in accordance with applicable law.

The Group implements an ongoing training program on its commitments, as set out in the Code of Conduct and the various internal charters, dedicated to employees, to ensure that all staff have a good understanding of the fundamental principles that they are asked to respect. From the moment they join the Group, and throughout their professional career within the Group, employees benefit from bespoke training sessions to deepen their understanding of the Group's workforce commitments. This approach encourages compliance with the principles of the Code of Conduct and internal charters while firmly embedding them in daily practices.

The Group has set up a whistleblowing system to ensure that its diversity and inclusion commitments are fully effective and guarantee that any anomalies are processed quickly and effectively. The secure reporting system is accessible to all employees, enabling them to report any problematic situation, and the Group undertakes to process each alert promptly, ensuring rigorous follow-up and implementing appropriate corrective measures. Any such reports can be made via a dedicated platform, accessible from the Group's website and at [alert.bolloré.com](mailto:alert.bolloré.com). The Group undertakes to ensure that alerts sent to the HR Department via the whistleblowing system concerning Code of Conduct commitments or internal charters are processed within three months.

The Group supports its subsidiaries in implementing their commitments, particularly in the areas of diversity and inclusion, and in introducing tools and best practices to respond to local realities and facilitate the application

of regulations and international standards, thus guaranteeing consistency and optimum compliance at all levels of the organization.

The thorough implementation of the policy is monitored to assess the effectiveness of actions and make any strategic adjustments needed to ensure targets are met. The Group ensures that employees can freely express any concerns or suggestions they may have on diversity and inclusion issues as part of individual dialogue (directly during performance reviews and professional interviews or during HR interviews that they can request at the end of performance reviews and professional interviews or directly via their HR contacts); and/or a personalized follow-up (for example, during an HR interview when returning from a long absence to identify any situations that may not have been expressed during the performance review or professional interview, or by giving employees access to appropriate health services); or by the smooth functioning of social dialogue, which enables diversity-related subjects to be included in collective bargaining, which enables representative bodies to take account of employees' particular concerns.

The frequency of discussions with social partners on gender equality or other diversity and inclusion topics also serves to monitor initiatives and identify any areas for improvement.

HR processes are aligned with Group commitments. Transparent, non-discriminatory HR tools and processes guarantee regular, structured performance reviews or professional interviews enabling scheduled and comprehensive dialogue with employees; a talent management system serving to assess performance, set objectives and align skills, thus facilitating the monitoring of employees' career paths; access to job offers open to all employees providing all staff (a new recruitment tool common to all Group entities is currently being rolled out for mid-2025); and a transparent and accessible recruitment and internal occupational mobility process.

Compliance with legal obligations in terms of professional equality is ensured through: the strengthening of the capacities of HR teams through specific training courses on non-discrimination in the workplace planned from 2025 onwards; actions taken to ensure compliance with legal obligations in terms of professional equality; best practices to guarantee fairness in terms of pay and career development; actions within the framework of gender equality agreements; monitoring of professional equality indicators and their evolution.

The Group encourages its divisions to take initiatives on the employment of people with disabilities. For example, internal communication campaigns on the importance of including people with disabilities are conducted at Bolloré SE Puteaux, IER, Iris and Polyconseil and some subsidiaries have appointed a disability adviser to support employees and enhance their integration into their teams, or organize awareness-raising events (DuoDay, conferences, workshops), or carry out studies to adapt working environments to ensure maximum accessibility (premises, IT tools, ergonomic workstations, etc.). The development of partnerships with associations and Esat labor assistance establishments helps to promote the professional integration of people with disabilities.

To promote the professional integration of workers with disabilities, Blue Solutions, Bluebus, Bolloré SE and Bolloré Energy have committed as part of their agreement on quality of life at work to use Esats and carry out awareness-raising initiatives throughout the year, in particular DuoDay. IER SAS calls on Esats on a regular basis (cleaning of premises, testing with qualification teams of products manufactured by the company) and organizes an annual awareness-raising week on visible and invisible disabilities. In 2024, a concierge service was set up at the Bolloré tower headquarters, staffed exclusively by employees from companies in the adapted sector. Bolloré Odet, Blue and Bluebus work with Esats and maintain partnerships with certain CAT labor assistance centers (Bretagne Ateliers – Le Caillou blanc) to integrate interns and employees with disabilities into their teams. In collaboration with the occupational physicians at Bolloré Odet, Blue Solutions and Bluebus, work is being carried out to find the best solutions within the company for employees recognized as unfit for their job following a health problem. In 2024, for example, the Group worked with the occupational physician and Sameth (a service that assists people with disabilities in

finding and maintaining employment) to study the possibility of modifying workstations and funding options; two interns with disabilities were invited to learn about a profession in 2024 at the DuoDay awareness-raising event. Bolloré Energy has set up a disability committee and a disability advisor in its teams and integrates the theme of non-discrimination into all training programs (induction, adaptation to the job, professional gender equality). The company organizes awareness-raising events on disabilities, including DuoDay.

IER SAS has appointed a disability adviser and Polyconseil has set up a disability committee made up of an HR officer and volunteer employees, the role of which is to inform, guide and support people with disabilities, whether or not they have been recognized as disabled.

In 2024, the Human Resources Department, in conjunction with the occupational health department, organized an awareness campaign for all Puteaux employees during the European Week for the Employment of People with Disabilities, with the organization of a conference and various awareness-raising workshops on the inclusion of people with disabilities.

### 3.1.5. TRAINING AND SKILLS DEVELOPMENT

#### 3.1.5.1. POLICIES RELATED TO THE TOPIC “TRAINING AND SKILLS DEVELOPMENT” (S1-1)

The Group considers training as essential to improving working conditions, developing skills and boosting the company's overall performance. Training plays a key role in implementing the Group's commitments to working conditions, social dialogue, diversity, equal opportunities and inclusion. In its Ethics and CSR Charter, the Group states that it considers training and skills development to be essential to achieving employee fulfillment, engagement and performance.

The Group's training policy is part of a global and integrated approach based on respect for the Group's commitments to sustainability (by contributing to alignment with the commitments made in the Code of Conduct, internal charters and international agreements, particularly concerning the UN SDGs); respect for the Group's commitments to comply with legal obligations (by monitoring regulations and complying with local and international legislation on professional training and skills development); improving working conditions and employee well-being (by helping employees to adapt to market trends and new skills requirements, and by creating a stimulating and motivating working environment that helps to retain talented staff); and business continuity and collective performance (developing teams' skills and adaptability, promoting

innovation and creativity, supporting employees in their internal occupational mobility and career development).

Training and skills development is both a fundamental commitment of the Group and a pillar of HR policy in terms of working conditions, social dialogue, diversity and inclusion.

The training programs mentioned above under the policies relating to “working conditions and social dialogue” and “diversity, equity and inclusion”, such as the training program implemented to make all employees aware of the fundamental principles of the Group's Code of Conduct, the induction program for newly-hired employees and mandatory training on safety and legal obligations, are a major component of the Group's overall training policy.

Our training and skills development policy is a key driver for fostering employee well-being, personal fulfillment, engagement and job satisfaction. It enhances employees' employability and internal occupational mobility and helps to maintain and develop strategic skills at the Group.

The Group's training and skills development commitments are deployed within each division, each one being responsible for implementing the policy by integrating its own specific features into its business lines.

#### 3.1.5.2. POLICIES FOR MANAGING MATERIAL IROS RELATED TO THE TOPIC “TRAINING AND SKILLS DEVELOPMENT” (S1-1)

The double-materiality assessment (DMA) has made it possible to identify the material impacts, risks and opportunities (IROS) related to the specific topic “training and skills development”. This analysis highlights the benefit of training on employees' personal fulfillment, engagement and employability for the entire scope of activities.

For IER, Automatic Systems, Blue Solutions, Bluebus and Bolloré SE Odet, the analysis also highlights the importance of training in promoting talent retention and the preservation of technical skills in the company, as well as the positive impact of the training and talent development policy on the competitiveness and sustainability of activities.

The Group's training and skills development policy is a component of its policy on working conditions, social dialogue, diversity and inclusion (D&I) and its HR strategy. This approach ensures compliance with legal obligations, the development of employee skills, and adaptation to changes in the job market. To manage the material IROS identified in the DMA, the Group implements its training policy and organizes mandatory training and voluntary training linked to issues identified as material (working conditions, social dialogue, diversity, inclusion, work-life balance).

Mandatory training is an essential foundation for ensuring employee safety, regulatory compliance and performance, alongside the specific training implemented to strengthen social dialogue. The Group's divisions enrich this approach by developing approaches adapted to their specific context, environment and activities. The Group encourages initiatives aimed at strengthening training and skills development at its subsidiaries.

As part of its sustainability report, the Group incorporates these training courses into its policies for managing the material IROS identified by the DMA. A number of key training courses have been mentioned in previous chapters to illustrate the actions implemented, notably training in social dialogue and workers' rights (raising awareness among managers and HR teams of legal obligations in terms of social dialogue, assisting HR teams and managers to ensure a better understanding of labor relations and consultation with employee representative bodies); training on diversity, inclusion and professional equality (training on work-life balance); coaching programs for employees to help them get to know each other better and interact in their environment; tools to raise awareness of the impact of working hours on health and personal balance; support for managers to optimize schedule management and prevent overwork.

By regularly assessing training programs through performance reviews, monitoring indicators and employee feedback, the Group is able to adjust actions and improve the measures in place. The professional assessment review (including performance reviews and training initiative reviews) is a key

component of the Group's training and skills development policy, serving to assess the training courses attended by our employees and identify their training needs.

### 3.1.5.3. TARGETS – TARGETS FOR POLICIES FOR MANAGING MATERIAL IROS RELATED TO THE SPECIFIC TOPIC “TRAINING AND SKILLS DEVELOPMENT” (S1-5)

To ensure compliance with its commitments on training and skills development, the Group has set targets for 2025 as part of its policies linked to the material IROs identified by the double-materiality assessment. The targets were established jointly by the Group's Human Resources Department and the Human Resources Departments of the various Group divisions. They apply to the entire scope of the Group's activities and salaried workforce.

**A minimum average of seven hours of training per year for employees, all types of training included.**

This target is in line with the Group's training policy, which aims to guarantee the employability and professional development of its employees while strengthening their engagement. A training monitoring tool is used to monitor achievement of the target.

**80% of employees attend at least one (1) performance review or professional interview at least every two years.**

This target applies to the Group's entire scope and workforce. It is part of the Group's training and skills development policy, as well as the various policies relating to working conditions and social dialogue, and diversity, equity and inclusion.

The performance review and the professional interview are key components of the Group's HR policy. They contribute to employee loyalty and skills development and enhance direct dialogue with each employee.

A tool for monitoring completed reviews and interviews serves to monitor the achievement of this target.

By setting this target for 2025, the Group is ensuring that its subsidiaries are committed to achieving the objective, which will be measured over a rolling two-year period from 2025.

### 3.1.5.4. MEASURES IN RESPONSE TO IROS RELATED TO “TRAINING AND SKILLS DEVELOPMENT” (S1-4)

The Group's HR Department organizes introductory and advanced sessions based on the “Process Communication Model” (PCM), which enables employees to develop their self-awareness and their individual and collective operating methods, in particular stress management.

The training reviews organized as part of performance reviews assess the training received with the employee and identify future needs. The Group encourages all positive initiatives by its subsidiaries in terms of employee training and skills development. The Group's divisions are free to implement schemes adapted to their environment.

Bolloré Energy has set up an integration program for new recruits (welcome by the manager, introduction to the company's businesses, goodies, training on the company's business activities). A detailed employee training plan is drawn up each year. Training needs are identified at the end of annual performance reviews and the training plan is drawn up following business-specific meetings.

Though not obliged to do so given its headcount, Automatic Systems signed a GEPP agreement in 2025; IER rolls out a training plan each year accompanied by a “hot and cold” assessment with indicator monitoring.

Bolloré Odet and Blue Solutions and Bluebus draw up a skills development plan, which they implement within the year. All the Group's compulsory training courses (e-learning modules) are completed by the employee populations concerned and a training review is carried out. A training program has been set up for new employees taking up their new duties. In the event of a change of assignment, each employee benefits from a three-month training/adaptation period (renewable where necessary). At the

end of this period, a review is carried out with the employee to assess any need for further training to remain in the new position. Internal and external job vacancies are regularly advertised via the internal job exchange. Priority is given to internal recruitment. Each applicant is interviewed by HR and the head of the recruiting department. The HR Department encourages and supports internal occupational mobility whenever possible.

The Human Resources Department of Bolloré Odet, Blue Solutions and Bluebus implements a “skills approach” to develop the employability and professionalism of its employees. In close collaboration with managers, organization charts and business lines are regularly updated and analyzed. These business lines are genuine tools for monitoring careers and anticipating human capital needs. They transcribe the professional development possible within a given scope and the steps required to achieve that development. Similarly, job descriptions and function definitions are regularly updated. Individual professional interviews are held every two years in France to support career development, internal occupational mobility and the development of versatility. Shared human resources management is carried out in close collaboration with local managers to establish a thorough understanding of employees holding job positions and ensure that skills are properly matched. This decentralization also makes it possible to empower and optimize decision-making with a view to improving efficiency and guaranteeing equality and equity. The individual performance review is considered as a progress interview providing an opportunity to discuss set and achieved objectives as well as conduct, career development goals, support and training initiatives, and future objectives.

### 3.1.6. PROCESSES FOR ENGAGING WITH OWN WORKFORCE AND WORKERS' REPRESENTATIVES ABOUT IMPACTS (S1-2)

The Group has set up several mechanisms to ensure ongoing dialogue with its employees and their representatives. This dialogue serves to address the subjects having an impact on the workforce and, in particular, those relating to material IROs identified as part of the double-materiality assessment.

Interaction with employees takes different forms, namely information, consultation or participation, depending on the subject addressed.

The Group regularly shares economic, social and environmental data with employee representatives. Where there are no employee representatives in an entity, this information is addressed directly to the employees concerned.

Any decision likely to have an impact on employment is subject to information or consultation with employee representative bodies, notably in France and Belgium.

Interactions take place at several key moments. Each year, the social policy and economic data are presented to employee representatives and collective bargaining is organized. Other ad hoc discussions are organized on current economic and social information. The management also regularly reviews the company's financial situation with all employees.

The company allocates specific resources to this dialogue. In France, an operating budget is made available to the Central Works Council to enable it to carry out their duties, generally corresponding to 0.2% of gross payroll.

Employees and their representatives are also consulted on the impact of environmental measures, particularly in the event of restructuring, job creation or elimination, training, retraining, health and safety, as well as on issues of professional equality and social equity. When a project has an environmental impact, its analysis is included in ongoing consultations.

Employees' views are taken into account in company decisions. Before implementing any project with an environmental impact, employee representatives are called on to contribute their opinion. Employee involvement is also fostered through working groups composed of managers and employees organized to discuss the company's priorities.

Employees are informed of the action taken relative to their feedback via several channels: union communications, distribution of meeting minutes via posters, email or intranet, and the publication of signed collective agreements on these same media.

Dialogue with employees can be direct or go through their representatives.

Where employee representative bodies exist, a schedule of meetings is drawn up and communicated to all elected representatives. Meeting agendas are drawn up jointly by the employer and the secretary of the employee representative body.

Interactions take place regularly. Depending on the size of the company, employee representative bodies meet every month or every two months. Extraordinary meetings are also organized for projects having an impact on employment. In addition, team meetings are scheduled on various subjects at all the subsidiaries.

The company's General Management, either directly or by delegation, most often to the HR Department, has operational responsibility for ensuring that these interactions take place.

The Group assesses the effectiveness of social dialogue by regularly collecting the opinions of each representative body, as well as by monitoring indicators such as the number of ordinary and extraordinary CWC meetings,

the number of suggestions put forward by employees, the inventory of agreements reached, and the results of negotiations held.

The Group ensures that its employees can freely express any concerns or suggestions as part of individual dialogue (directly during performance reviews and professional interviews or during HR interviews that they can request at the end of performance reviews and professional interviews or directly via their HR contacts); and/or a personalized follow-up (for example, during an HR interview when returning from a long absence to identify any situations that may not have been expressed during the performance review or professional interview, or by giving employees access to appropriate health services); or by the smooth functioning of social dialogue, which enables diversity-related subjects to be included in collective bargaining and employee representative bodies to take account of employees' concerns.

The Group ensures that the fundamental rights of its employees are respected in their working environment. The Group's Code of Conduct, which sets out its commitments in terms of respect for human rights, is incorporated into the internal rules of procedure of all Group subsidiaries. All employee representative bodies have been consulted on this subject in accordance with the law.

Proper implementation is also monitored individually via performance reviews and professional interviews, allowing each employee to express their views on working conditions, expectations and concerns, and enabling the company to analyze the quality of social dialogue and identify any areas for improvement and strengthen well-being at work.

The effectiveness of these actions is measured regularly as part of social dialogue, and strategic adjustments are made if necessary to ensure that targets are met.

Particular attention is paid to the most vulnerable or marginalized employees, such as women and workers with disabilities. At subsidiaries with more than 50 employees, the presence of HR teams is reinforced. All employees have the opportunity to meet an HR adviser at any time. Where the situation so requires, specific support is offered, in particular by work psychologists or specialized organizations.

### 3.1.7. PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND CHANNELS FOR OWN WORKFORCE TO RAISE CONCERNS (WHISTLEBLOWING SYSTEMS AND REMEDIATION PROCESSES) (S1-3)

#### Whistleblowing system

The whistleblowing system, which can be accessed on the Group's website and at [alert.bolloré.com](http://alert.bolloré.com), includes in a single system all the issues relating to the fight against corruption and influence peddling, as well as to the duty of vigilance, which have been defined and detailed.

Since the Sapin II law requires a whistleblowing 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 has been the subject of consultations with the employee representative bodies to adapt to the Cnil reference standard relating to the processing of personal data intended for the implementation of a professional whistleblowing alerts system.

Its deployment and the processes for collecting and handling alerts are explained in the alert procedure, available on the Group's website.

Whistleblowers' alerts are processed at the head office level and overseen by the Chair of the Ethics – CSR and Anticorruption Committee, which carries out its mission independently.

The whistleblowing system is open to everyone: the mechanism allows any employee of Bolloré Group or its commercial partner or any person 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.

As such, the Group's alert and reporting platform can be used for alerts relating to violations or risks of violations of human rights, fundamental freedoms, personal health and safety or the environment.

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 timeframe, 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 Group protects whistleblowers who act in good faith from any form of reprisal. This protection is enshrined in the internal rules of procedure of all Group subsidiaries, such that anyone contravening it is liable to disciplinary action.

#### Remediation process

Employees have several ways of expressing their concerns. The Group ensures that employees can freely express any concerns or suggestions as part of individual dialogue (directly during performance reviews and professional interviews or during HR interviews that they can request at the end of performance reviews and professional interviews or directly via their HR contacts); and/or a personalized follow-up (for example, during an HR interview when returning from a long absence to identify any situations that may not have been expressed during the performance review or professional interview, or by giving employees access to appropriate health services); or by the smooth functioning of social dialogue, which enables diversity- and inclusion-related subjects to be included in collective bargaining and employee representative bodies to take account of employees' concerns. The Group has also set up a whistleblowing system and a system to protect whistleblowers. The secure reporting system is accessible to all employees, enabling them to report any problematic situation, and the Group undertakes to process each alert promptly, ensuring rigorous follow-up and implementing appropriate corrective measures. The Group undertakes to ensure that alerts sent to the HR Department concerning the commitments of the Code of Conduct or internal charters are processed within a maximum of three months.

All these measures were implemented internally, without recourse to external mechanisms. The Group has a structured system for managing complaints and claims.

To guarantee the accessibility and effectiveness of these channels, the Group maintains dedicated HR staff and ensures the smooth operation of the reporting platform. The regular renewal of employee representative bodies also helps to ensure continuity in social dialogue and the representation of employee interests. The regular renewal of employee representative bodies ensures that employees are always represented and that their concerns are taken into account.

Any complaints submitted via the whistleblowing system or reported by employee representatives are then handled by the Human Resources Department. An investigation is carried out on the basis of the reports received, to analyze the situation and take appropriate action.

The effectiveness of these systems hinges on maintaining dedicated resources and rigorously monitoring the reports.

Stakeholders concerned by any complaints or claims are heard during investigations, ensuring that their concerns are taken into account in the resolution of reported problems.

Complaint escalation channels are recognized as legitimate and are trusted by employees. They are widely communicated internally and accessible to all staff.

Each situation is studied individually in order to propose an appropriate response. Our solutions comply with international human rights standards. The company also learns from complaints in order to continuously improve its processes and prevent future risks.

We encourage dialogue with complainants to find appropriate solutions rather than imposing unilateral decisions. The HR function, which is independent of operational management, ensures that reports are handled impartially and objectively.

Employees are protected against any form of retaliation when using these systems. This protection is guaranteed by the Group's Code of Conduct, which also makes it possible to report an alert anonymously via the dedicated platform.

Employee representatives also benefit from the legal protections in force, guaranteeing their freedom of action and their ability to effectively defend employee rights.

### 3.1.8. PROTECTING HEALTH AND ENSURING THE SAFETY OF THE WOMEN AND MEN EXPOSED AS PART OF OUR ACTIVITIES

#### 3.1.8.1. HEALTH AND SAFETY POLICIES (S1-1)

##### GROUP

Through their QHSE departments, all the subsidiaries of the Blue, Bolloré Innovative Thin Films, Bolloré Energy and Systems divisions apply health and safety policies specific to their industrial activities. These are set out in improvement programs presented and approved each year by employee representatives. These health and safety policies are implemented to prevent accident risks.

In addition, the Bolloré Group has formalized its commitment to international standards on the protection of human rights and individual health and safety in its ethical framework (Code of Conduct, Ethics and CSR Charter) and is a member of the Global Compact.

Each business activity implements prevention policies, notably through the preparation and annual updating of the DUERP single document on the

assessment of occupational risks (*document unique d'évaluation des risques professionnels*), and regular meetings of the CSSCT Occupational Health, Safety and Working Conditions Committee (*Comité santé-sécurité et conditions de travail*).

The CSSCT must include members of the Central Works Council, a representative of the employer, the occupational physician, the QHSE manager, the human resources manager, and the Chairman and CEO or a representative. It meets once a quarter, i.e. at least four times a year.

Health and safety performance is also monitored by HR teams, who are responsible for consolidating frequency and severity rates and for reporting any accidents, and by employee representative bodies.

##### BLUE

The Blue division has a health, safety and environment (HSE) policy entitled "Being at the service of sustainable development", signed and addressed by its Chairman and CEO to all Blue Solutions and Bluebus employees.

It can be broken down into six points:

1. ensure that every member of staff leaves work in good health;
2. improve safety;

3. comply with regulations;

4. reduce the impact of our activities on the environment;

5. focus on prevention;

6. provide everyone with the means to do their job well.

It applies to all workers on the production lines of Blue subsidiaries.

##### BOLLORÉ INNOVATIVE THIN FILMS

Regarding Bolloré Innovative Thin Films's business activities, the HSE policy "Being an agent of change" is communicated to all employees. This policy places health and safety performance at the heart of continuous improvement and prevention at the heart of employee involvement. This policy applies to all workers on the production lines of Bolloré Innovative Thin Films subsidiaries.

##### SYSTEMS

IER and Automatic Systems entities lead QHSE policies covering the occupational health and safety issues of employees and third parties and implement a HSE management system subject to evaluation audits. The HSE management system includes:

- the publication of documentation (risk analysis, single document including psychosocial risks, program on risk prevention and the improvement of working conditions (annual Papripact program), job descriptions, instructions and safety sheets);
- information and training on the prevention of risks to which employees are exposed: electricity certification, manual handling, chemical risk, etc.;
- systematic analysis of the causes of workplace accidents that may occur at sites;

- a psychosocial risk assessment and action plan for IER and Automatic Systems France entities;

- the implementation of action plans and proposals for corrective action, and publication for stakeholders formalized in the Papripact program, giving rise to an annual assessment approved by the employee representative bodies (Central Works Council).

Through their HSE management system, IER and Automatic Systems are committed to a process of occupational risk prevention in close collaboration with their internal stakeholders (social partners, CSSCT members, occupational physician).



## BOLLORÉ ENERGY

Bolloré Energy has a health, safety and environment policy, updated in 2019. The policy provides a framework for health and safety risks in the workplace. Harnessing this policy, the Oil logistics division does its utmost to meet its customers' high standards and has developed a set of best practices to control these risks (particularly transport-related risks) when delivering its products and services to private customers. In France, Seveso-classified sites are subject to specific and particularly strict health and safety regulations.

In terms of accident prevention, the main measures are focused on preventing fire risk. The flammability of fuel oil and diesel fuel is triggered at very high temperatures (over 65 °C). For this reason, a major accident prevention policy, updated in 2022, is in place at the Bolloré Energy sites identified as most at risk. In this respect, Bolloré Energy's health and safety policies place the priority on the workers most at risk, i.e. delivery drivers and operators working at oil depots.

### 3.1.8.2. PROCESSES FOR ENGAGING WITH OWN WORKFORCE AND WORKERS' REPRESENTATIVES ABOUT HEALTH AND SAFETY (S1-2/SBM-2)

The Group's divisions roll out various processes within their respective subsidiaries to rally employees and their representatives around health and safety issues. Health and safety issues are monitored by the QHSE departments and teams that report directly to General Management, as well as through regular meetings of the Health, Safety and Working Conditions Committee (CSSCT) of each entity.

The CSSCT must include members of the Central Works Council, a representative of the employer, the occupational physician, the QHSE manager, the Head of Human Resources, and the Chairman and CEO or a representative of the latter. It meets once a quarter, i.e. at least four times a year. Several functions are responsible for this topic: the Human Resources Department, site managers and QHSE managers.

## BLUE

Health and safety impacts and risks are regularly communicated to employees, in particular by operators, so that any issues identified can be brought to the attention of performance management.

Among the processes implemented to rally employees and their representatives around health and safety issues, Blue's subsidiaries rely on a network of health

and safety correspondents appointed at their sites and on the consolidation of reported data by the HR Department, which is also responsible for communication on this matter. The HR teams work with the QHSE teams to organize visits by the occupational physician for training purposes.

## BOLLORÉ INNOVATIVE THIN FILMS

For Bolloré Innovative Thin Films's activities, an annual target for the completion of safety inspections has been determined for the entire operating scope. These visits are an opportunity to discuss safety issues with employees and address the best practices and conduct to be implemented, which are then reviewed in the departments concerned. Where appropriate, these best practices can feed into the safety action plan.

## SYSTEMS

The subsidiaries of the Systems division rely mainly on the consultation mechanisms of internal stakeholders (CWC, CSSCT, CPPT). In addition to monthly consultations, special consultations can be scheduled as required.

## BOLLORÉ ENERGY

Each year, a working group is organized with employee representatives to administer a survey of occupational risks and assess the different types of risk as well as their frequency, severity and control level. The CSSCT meets four times a year. These meetings serve to monitor the progress of our actions, as well as feedback from the field. In addition, an HSE Management Committee meets monthly.

### 3.1.8.3. CHANNELS ENABLING PERSONNEL TO REPORT HEALTH AND SAFETY CONCERNS (S1-3)

Health and safety concerns are addressed by quarterly meetings of the CSSCT with employee representatives and HR teams from each subsidiary. In addition, all the Group's subsidiaries have set up a mechanism for reporting incidents and accidents in their industrial activities, from the field to their General Management.

Industrial entities also use a suggestion system to consult staff and their representatives, encouraging operators to take an active role in safety. Employees can suggest health and safety improvements. In this way, each operator can pass on a suggestion to the manager at any time. These suggestions are discussed on a monthly basis by a Steering Committee, which also monitors performance indicators on the related processing times and service quality. These matters are followed up by a person in charge of performance improvement. For the Blue division, subsidiaries also rely on a crisis management procedure detailing the organizational principles to be implemented at the division in a crisis situation in order to anticipate and minimize the impact. This procedure is the responsibility of Blue's General Management and is based on the identification of risk categories that could lead to a major crisis.

Shop stewards regularly conduct a questionnaire campaign among employees, incorporating these issues.

Work-related accidents occurring in the Bolloré Group's industrial activities are systematically analyzed by QHSE teams using a cause-tree analysis and are accompanied by action plans (purchase of equipment, deployment of additional awareness-raising actions, training, etc.) included in the single document (DUERP).

In addition, all employees can contact their entity's employee representative body to raise any concerns.

The whistleblowing system enables employees of the Bolloré Group companies and its external and occasional partners to alert it of a crime or an offense, a breach of the law or regulations, a threat to the general interest, or a failure to follow the Bolloré Group's Code of Conduct resulting from the activities of Group companies or of their subcontractors or suppliers. In return, the whistleblower benefits from the guarantees associated with whistleblower status:

- confidentiality: information identifying the whistleblower is treated as confidential and may not be disclosed outside the circle of persons authorized to process the alert without the consent of the individual concerned, except to the judicial authorities;

- protection: this system is optional; it supplements rather than replaces the traditional methods used to report incidents in this scope (in particular, for employees, the hierarchical channel). No disciplinary sanction or penalty of any kind will be imposed for either the non-use or use of the system in good faith, even if the facts reported subsequently turn out to be inaccurate or do not give rise to any further action.

This system, accessible via the Group's website and alert.bolloré.com, can also be used to report health and safety issues.

Alerts are received by whistleblowing officers within the scope of their functions, specially designated by mutual agreement by all Group companies using the whistleblowing system by virtue of their position, competence, authority and resources to review the admissibility of alerts and initiate or coordinate the ensuing investigation. These officers are bound by a strict obligation of confidentiality. Each one is supported by a small team of

Bolloré SE employees specially authorized to carry out the corresponding tasks and subject to the same obligations as the officer, notably in terms of enhanced confidentiality and training. The members of this team are chosen for their expertise in the matters covered by the officer. In particular, they are part of the Human Resources Department in cases of discrimination, moral or sexual harassment, violations of personal health and safety, human rights and fundamental freedoms involving an employee of a Bolloré Group company.

All Group employees are informed of the existence of the system and made aware of the issues involved through mandatory online training on the Code of Conduct. The Compliance Department can monitor the effectiveness of the system by analyzing the number of views and monthly visits to the alert platform or dedicated pages on the Group's official website.

### 3.1.8.4. "PLANS D'ACTION" FOR MANAGING IROS RELATED TO HEALTH AND SAFETY (S1-4)

#### INDUSTRIAL ACCIDENT RISKS

The risks to employee health and safety that could arise from an industrial accident have been identified as material for Blue because of the issues involved in battery and bus manufacturing operations (fire, storage site explosion). The issues of exposure to and handling of hazardous products are identified in the context of lithium battery production. While lithium is not toxic, it can be dangerous due to its corrosive and flammable nature. The design of the facilities (e.g. dry air conditioning in the workshops), fire risk prevention measures, operating instructions, staff training and personal protective equipment are all adapted to the specific risks of lithium metal. Blue Solutions specializes in "solid-state" battery technology. If these batteries are punctured, there is no release of hazardous liquids or formation of explosive atmospheres in confined environments.

Blue Solutions battery production sites have obtained IATF 16949:2016 certification, reinforcing aspects linked to safety, traceability and the technical specifications required for automotive production.

Risk management at Blue sites is formalized through environmental management systems (EMSs) or specific measures and controls consistent with recognized standards such as ISO 14001. The ISO 14001 standard and the management system include the prevention and management of industrial accident risks. In 2024, 100% of Blue and Bolloré Innovative Thin Films entities were covered by a management system addressing both environmental and health and safety issues.

Various policies and documents formalize how the risks associated with industrial accidents are taken into account:

- the environment program, signed by Blue's Chairman and CEO, includes a pillar entitled "Reducing the environmental risks and impacts of our activities", with a commitment to "Risk management: ensuring the control of risks linked to the storage of batteries and hazardous materials";
- the Blue Solutions emergency plan, which complies with IATF requirements and has been approved by the Managing Director, lists various types of risk, including fire, the frequency and severity of which are rated. The document specifies the actions taken to control risks;
- process risk analysis, formalized via SWOT analyses applied to each QHSE process, as well as the application of instructions for the first intervention team member and the second intervention team member. The instructions include a fire department alert sheet setting out the procedure to follow in the event of a fire. Employees are specifically trained to provide an initial reaction force in the event of an accident and to react in the event of an alarm. If necessary, they are able to control the risks associated with a potential fire outbreak;
- Blue also has an intervention plan, formalized in several documents for each building, which is currently being restructured in collaboration with the fire department.

Specific operating methods are derived from these procedures. As Blue Solutions sites are classified as ICPEs (facilities classified for environmental protection), they are subject to a classification regime adapted to the scale of the risks and negative impacts and to regulatory controls.

#### RISK OF WORKPLACE ACCIDENTS

##### GROUP

Work-related accidents occurring in the Bolloré Group's industrial activities are systematically analyzed by QHSE teams using a cause-tree analysis and are accompanied by action plans (purchase of equipment, deployment of additional awareness-raising actions, training, etc.) included in the single

document (DUEP). The annual Papripact program on risk prevention and the improvement of working conditions formalizes health and safety action plans, giving rise to an annual review approved by employee representative bodies within the framework of the CWC. It is formalized by all activities.

##### BLUE

The health and safety risks of the employees of Blue subsidiaries relate to chemical risks, cuts, electrical hazards, and issues involved in moving machinery or handling heavy parts (lifting equipment).

To reduce the number of accidents, Blue's subsidiaries use the 5S method, a five-step system for optimizing workplace organization, and are focused on improving machine protection at all workstations through regular risk analysis. In addition, the roll-out of a mandatory dedicated training course serves to strengthen the safety culture among managers, who regularly visit the sites. In 2024, Blue Solutions deployed 60 such courses. Preventive measures are identified as part of the annual assessment of the DUEP single document and through the quarterly meeting of the CSSCT, which reviews the measures taken and any corrective actions implemented.

Among the processes and action plans rolled out to prevent health and safety risks, the industrial sites have also put in place systems allowing staff to make suggestions to involve teams more in the policy and suggest and initiate measures to improve safety at workstations. The French sites have adopted a policy for the prevention of arduous working conditions through commitments and actions incorporated in the occupational risk prevention process, in collaboration with the occupational physician. All arduous factors have been analyzed since July 2016, above and beyond legal obligations. Shift work, which is inherent to the activity, is the only issue that cannot be addressed by prevention. That is why, since 2016, people who have worked shifts for most of their careers have benefited from an early retirement plan to compensate for the fact that the personal hardship account (additional time deposited in the time savings account) does not apply retroactively.



In 2024, Blue Solutions made a number of investments to reduce employee health and safety risks, including:

- new purchases of personal protective equipment (PPE) adapted to the chemicals used in the new-generation batteries (Gen4);
- purchases of filtration hoods for the R&D teams.

The Bluebus subsidiary updated its organization of internal fire teams and initiated a study to improve load bearing, with the conclusive trial of a neck

support system. It also implemented various measures, including a fall arrest system for operators (protective barrier, secure ladder).

On request, an occupational health ergonomist can be called on in the event of any issues for operational staff and an ergonomics display is permanently accessible.

### BOLLORÉ INNOVATIVE THIN FILMS

Bolloré Innovative Thin Films's subsidiaries identify the actions to be taken by organizing daily health and safety meetings and monitoring a global safety action plan drawn up by the QSE department. Each year, a review is made of the risks/threats/strengths/weaknesses of Bolloré Innovative Thin Films's business activities, taking into account health and safety issues and leading to the development of a corresponding action plan.

Bolloré Innovative Thin Films's operating committee also monitors the activity's results, events and KPIs on quality, health, safety and the environment on a monthly basis. The conclusions are shared with all managers and action plans or corrective measures are taken according to the issues identified.

### SYSTEMS

Systems division subsidiaries identify health and safety measures based on feedback from sites and a regulatory watch (Amadeo). Health, safety and working condition improvement plans (Papripact) are monitored with year-end completion rates of more than 80%, which was the case in 2024. Systems division entities organize specific initiatives on improving working conditions and employee well-being.

In addition, the after-sales/worksites department of Automatic Systems Belgium has been VCA certified (Belgian health, safety and environmental certification) since 2008, giving it the means to control the safety risks it

encounters at each new facility or intervention site (maintenance, repair). In 2023, IER completed an assessment of psychosocial risks with the aim of improving quality of life and working conditions. Following this assessment, actions were taken to limit the risks identified.

To prevent risks, the locations of the production and storage lines of IER and Automatic Systems plants are optimized in terms of processes, which has served to reduce the probability of occurrence of occupational diseases such as musculoskeletal disorders (MSDs).

### BOLLORÉ ENERGY

As is the case with all the Group's industrial activities, Bolloré Energy's health and safety risks are identified and addressed during the annual review of the occupational risk assessment document. These issues are discussed with employee representatives to determine the measures to be taken and to review the effectiveness of the measures taken in the previous year.

The main risks identified are fire risks, road traffic risks and risks associated with gestures and postures, various corrective and mitigation measures are implemented such as:

- regular fire prevention exercises carried out to avoid possible emergency situations (for example, a fire at the loading station). Five exercises were carried out in 2024;
- creation of a fire defense plan at distribution network depots;
- improved safety for the delivery and unloading of additives, hazardous oil products: Bolloré Energy installs new dedicated tanks every year;
- appointment of a heating services controller and a heating services technical trainer to support our technicians in this activity, which involves a range of specific risks (use of cutting tools, chemicals, etc.);
- annual employee training (e-learning, seminars, etc.) on various topics: occupational health and safety, chemical risks, prevention of risks related

to the transportation of dangerous goods by road (ADR, FCO, road safety training), etc.;

- an online ordering platform for protective equipment specially designed to be adapted to the business lines was set up in 2020 and updated in 2024 to include new equipment;
- since 2021, an online workplace accident reporting tool has been used to centralize the process of recording workplace accidents, strengthening the reliability of data;
- the deployment of prevention plans (information on site risks in view of the work to be carried out) and, potentially, the issuing of a fire permit to prevent risks for external companies.

Bolloré Energy owns six Seveso sites, three of which are classified as high threshold. Seveso sites are also subject to inspections by France's regional environmental, planning and housing agency, DREAL. High thresholds are inspected annually and low thresholds every three years. Every five years, regulatory inspections are carried out on sites classified as ICPE (facilities classified for environmental protection). These accounted for four inspections at Bolloré Energy sites in 2023.

### FINANCIAL RISKS

The negative health and safety impacts identified in the double-materiality assessment are also associated with financial risks.

A decline in production, and therefore income, can be caused by workplace accidents. This may also lead to higher costs, owing to increased staff turnover resulting from poor health and safety conditions. Insofar as these

financial risks stem from the negative impacts identified, they are addressed through the same policies and action plans. Preventing workplace accidents and implementing health and safety policies reduce the financial risks associated with interrupted production or increased staff turnover.

### 3.1.8.5. DESCRIPTION OF TARGETS LINKED TO THE MANAGEMENT OF HEALTH AND SAFETY-RELATED IROS (S1-5/MDR-T)

To ensure compliance with its commitments on health and safety, the Group has defined targets for 2025 as part of its policies linked to the impacts, risks and opportunities (IROS) identified by the double-materiality assessment.

The targets were determined jointly by the Group Human Resources Department and the Human Resources Departments of the various Group divisions.

#### GROUP

As part of the formalization of its CSR strategy, and in particular its "Social" focus on protecting the health and safety of its employees, Group health and safety objectives are set annually:

- by 2027, 85% of Bolloré Group's entities with an industrial site must have produced a health and safety risk map. This target was achieved in 2024 and will therefore be updated in 2025;

- by 2030, 100% of Bolloré Group entities with an industrial site must have introduced annual health and safety performance reviews by their Management Committee, Executive Committee or Board of Directors. In 2024, the rate was 90%.

These objectives are drawn up jointly by the CSR Department and its network, at meetings of steering committees organized to ensure that the Group's strategy is properly implemented by its businesses.

#### BLUE

Blue's main target is to aim for zero accident or incident, for all its employees. In support of this principal objective, Blue is targeting ISO 45001 certification for its management system in 2026.

#### BOLLORÉ INNOVATIVE THIN FILMS

Bolloré Innovative Thin Films formally documents its employee health and safety objectives and action plan in the safety programs for its Dielectric and Packaging Films Activities.

It has set itself a target of 50 behavioral safety visits in 2025 for its Dielectric activities, and 70 for its Packaging Films Activities.

### 3.1.9. S1 METRICS

The definitions or methodologies are specified for indicators applicable in section 1.5.2 - Information on employment indicators and the publication of information on specific circumstances (BP-2).

#### 3.1.9.1. CHARACTERISTICS OF THE COMPANY'S EMPLOYEES (S1-6)

The indicators relating to the workforce are communicated in terms of the number of employees as at December 31, 2024.

##### Workforce as at December 31, 2024

Gender	Number of employees	%
Male	2,394	75
Female	810	25
Other <sup>(1)</sup>	0	0
Not declared	0	0
<b>TOTAL EMPLOYEES</b>	<b>3,204</b>	<b>100</b>

(1) Employees who identify as third gender or gender neutral.

##### Breakdown between countries in which the Group has at least 50 employees representing at least 10% of the workforce

Country	Number of employees	%
France <sup>(1)</sup>	2,479	77
Other countries	725	23
<b>TOTAL</b>	<b>3,204</b>	<b>100</b>

(1) France is the only country with at least 50 employees and representing at least 10% of total employees.

##### Breakdown by gender and type of employment contract as at December 31, 2024

	Women	Men	Other	Not declared	<b>TOTAL</b>
Number of employees	810	2,394	–	–	<b>3,204</b>
Number of employees on permanent contracts	775	2,311	–	–	<b>3,086</b>
Number of employees on fixed-term contracts	35	83	–	–	<b>118</b>
Number of employees on zero-hour contracts <sup>(1)</sup>	–	–	–	–	<b>–</b>

(1) Employees on zero-hour contracts are mainly seasonal workers and freelancers. For information, there were 4.5 FTE<sup>(a)</sup> workers on this type of contract in 2024.

(a) FTE: Full-time equivalent (calculated based on attendance and working hours over the year).

**Breakdown by region and by type of employment contract as at December 31, 2024**

	Americas	Asia	Europe	France and overseas departments	TOTAL
Number of employees	298	102	325	2,479	3,204
Number of permanent contracts	293	89	305	2,399	3,086
Number of fixed-term contracts	5	13	20	80	118
Number of employees on zero-hour contracts	–	–	–	–	–

**Number of permanent-contract departures in 2024**

Reasons for departure	Number
Resignations	201
Terminations by mutual agreement	59
Number of individual dismissals	75
Number of redundancies	42
Number of retirements	56
Number of departures for other reasons	22
Turnover rate <sup>(1)</sup>	14.4%

(1) For the method used for calculating this indicator, please refer to the methodology note (see section 1.5.2 – Information on employment indicators and the publication of information on specific circumstances (BP-2)).

**3.1.9.2. CHARACTERISTICS OF NON-SALARIED WORKERS ON THE COMPANY'S WORKFORCE (S1-7)**

The Group is not currently able to report the number of non-salaried workers<sup>(1)</sup> as at December 31, 2024. The Group is working on solutions to incorporate information about these non-salaried workers in 2025.

**3.1.9.3. COLLECTIVE BARGAINING COVERAGE AND SOCIAL DIALOGUE (S1-8)**

**Type of coverage**

	Coverage rate <sup>(1)</sup>	
	France <sup>(2)</sup>	Group
Percentage of employees covered by collective bargaining agreements	99.7%	85.9%
Percentage of employees represented by employee representatives	97.5%	83.1%

(1) Excluding entities that joined in 2024.

(2) France is the only country with at least 50 employees and representing at least 10% of total employees.

**3.1.9.4. DIVERSITY METRICS (S1-9)**

**Breakdown of employees by age group as at December 31, 2024**

	Number of employees	%
Under 30 years old	480	15.0
30-50 years old	1,671	52.2
Over 50 years old	1,053	32.9
<b>TOTAL</b>	<b>3,204</b>	<b>100</b>

**Breakdown by gender at senior management level as at December 31, 2024**

	Number	%
Women	19	26
Men	54	74
<b>TOTAL</b>	<b>73</b>	<b>100</b>

The notion of “senior management” corresponds to the two lower levels of the Board of Directors of the listed company, i.e. the Group's Executive Committee and the Executive Committees of the Group's main activities: Bolloré Energy, Blue Solutions, Bolloré Films, IER, Automatic Systems and Polyconseil.

(1) External self-employed workers and employees of a company whose main activity is the provision of staff (in Europe, these are companies with Nace code 78).

### 3.1.9.5. DESCRIPTION OF HEALTH AND SAFETY PARAMETERS (S1-14)

	2024
Percentage of employees covered by the company's health and safety management system based on legal requirements and/or guidelines under recognized standards	92.9%
Number of workplace accidents with lost time	66
Workplace accident rate (frequency rate) <sup>(1)</sup>	12.97
Number of fatalities <sup>(2)</sup> resulting from workplace accidents or occupational illnesses	0

- (1) For the method used for calculating this indicator, please refer to the methodology note (see section 1.5.2 – Information on employment indicators and the publication of information on specific circumstances (BP-2)).  
(2) Includes other on-site workers.

### 3.1.9.6. COMPENSATION METRICS (COMPENSATION GAP AND TOTAL COMPENSATION) (S1-16)

The ratio between the highest annual total compensation and the median annual total compensation for all employees (excluding the person in receipt of the highest compensation). The compensation taken into account for the calculation is the full-time equivalent total compensation of employees (permanent and fixed-term contracts, excluding work-study students) continuously present for at least two calendar years as at August 31 of the fiscal year for which the ratio is calculated. In order to neutralize the impact of different working hours, the annual salary used to calculate the median was calculated based on 1,820 working hours per year.

The compensation calculated for fiscal year N comprises the fixed components in respect of fiscal year N and the components of variable compensation in respect of fiscal year N-1 paid during fiscal year N, the free shares allocated during fiscal year N, the profit-sharing and incentive bonuses, the employer's contribution and the benefits in kind paid during year N.

The free shares allocated during a fiscal year are valued at their grant date in accordance with IFRS.

Since the Group operates in countries with very different currencies and purchasing powers, the calculation of this compensation was adjusted using a cost-of-living index and an exchange rate.

	2024
The ratio between the highest annual total compensation and the median annual total compensation for all employees	86.75

The gender pay gap analysis is based on gross hourly pay levels for all employees on permanent and fixed-term contracts, excluding work-study students. The following formula has been applied to calculate the gender pay gap:

$$[(\text{Average gross hourly wage for men} - \text{average gross hourly wage for women}) / \text{Average gross hourly wage for male employees}] \times 100$$

This hourly wage was calculated based on the collective working hours. In France, the fact that Executives who work a fixed number of hours a year do not all have the same working hours, the number of hours worked per month applied is the same as the collective working hours per month, and for senior executives not subject to statutory working hours, the legal working week excluding RTT days (time off in lieu of the thirty-five hour working week) has been used. Since the Group operates in countries with very different currencies and purchasing powers, the calculation of these effects was adjusted using a cost-of-living index and an exchange rate. The compensation taken into account for the calculation is the full-time equivalent total compensation of employees continuously present for at least two calendar years as at August 31 of the fiscal year for which the gap is calculated. The compensation calculated for fiscal year N comprises the fixed components in respect of fiscal year N and the components of variable compensation in respect of fiscal year N-1 paid during fiscal year N, the free shares allocated during fiscal year N, the profit-sharing and incentive bonuses, the employer's contribution and the benefits in kind paid during year N.

The free shares allocated during a fiscal year are valued at their grant date in accordance with IFRS.

	2024
Gender pay gap	-1.96%

### 3.1.9.7. SERIOUS HUMAN RIGHTS SCENARIOS, COMPLAINTS AND INCIDENTS (S1-17)

Total number of incidents of discrimination, including harassment, reported during the period in question	2
Number of complaints submitted through channels that allow employees to express their concerns (including complaint mechanisms)	0
Total fines, penalties and compensation imposed by judgments to pay damages resulting from the incidents and complaints referred to above	0
Number of serious human rights incidents affecting employees during the period in question, including details of the number of breaches of the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, or the OECD guidelines for multinational enterprises	0
Total fines, penalties and compensation paid in respect of the incidents described above	0

In 2024, two cases of harassment were reported through hierarchical channels at Bolloré Energy and were investigated and acted upon by the departments in question:

- the first case resulted in disciplinary sanctions;
- the second case resulted in dismissal.

In 2024, Bolloré Energy continued its efforts to tackle harassment by rolling out a new training campaign to all employees.

These measures illustrate our commitment to maintaining a respectful working environment and strictly enforcing our zero-tolerance policy towards harassment.

## 3.2. Promoting human rights in our value chain (ESRS S2)

Specific material issue	Impact/risk/opportunity	Description	Scope concerned
<b>Working conditions (in the value chain)</b>	Negative impact	Social dialogue and freedom of association: • negative impact on the well-being of employees in the value chain linked to the absence or breaches of labor rights and freedoms (freedom of association, trade union rights, collective bargaining, protection of workers' representatives, discrimination against workers' representatives)	Blue Systems
	Negative impact	Working hours/work-life balance: • negative impact on the psychological/physical well-being of employees in the value chain linked to excessive working hours/poor work-life balance, overwork, depression, risk of burnout	Blue Systems
	Negative impact	Lack of a living wage: • inability to afford suitable food/housing as a result of a salary that is inadequate/below a living wage	Entire scope
	Financial risk	Fall in revenue as a result of disruption to production caused by the termination of a contract with a supplier that fails to provide the required working conditions	Blue
<b>Health and safety (in the value chain)</b>	Negative impact	Risk of industrial accidents: • fires/explosions at storage sites for petroleum products with potentially serious consequences for the health of employees in the value chain/fatalities	Bolloré Energy
		Risk of serious accidents related to the extraction of raw materials: • risk of accidents linked to the manufacturing processes for battery and bus subcomponents (e.g. lithium) and the extraction of their constituent materials	Blue
		Risk of serious accidents related to the extraction of raw materials: • extraction of metals	Systems
	Reputational risk	Major media controversy over a serious accident involving an employee in Bolloré's value chain	Blue
<b>Forced labor and child labor (in the value chain)</b>	Negative impact	Damage to the physical or psychological well-being of workers linked to forced labor (illness, stress, exhaustion, etc.): • Breaches of any of the fundamental conventions of the ILO (International Labour Organization), resulting in restrictions on the individual's freedom of movement and self-determination	Blue Systems
	Negative impact	Damage to the psychological well-being of children: depriving them of the right to education or freedom of movement, which can have a material impact on their future development (psychosocial disorders, depression, etc.)	Blue Systems
	Reputational risk	Major media controversies that may severely damage the company's image in the event that forced labor/child labor is used in the value chain	Blue Systems

### 3.2.1. MATERIAL IROS CONCERNING WORKERS IN THE VALUE CHAIN AND INTERACTION WITH STRATEGY AND BUSINESS MODEL (SBM-3)

The materiality assessment identified three main issues that could have a material negative impact on the supply chain: working conditions, health and safety, and forced labor and child labor. The impacts identified in ESRS S2 are considered to be systemic.

#### 3.2.1.1. WORKING CONDITIONS IN THE SUPPLY CHAIN

Issues relating to the working conditions of employees of subcontractors and suppliers who may be involved in the Bolloré Energy, Bolloré Innovative Thin Films, Blue and Systems supply chain concern the organization of working hours, compensation and social dialogue.

- **The organization of working hours** refers in particular to the monitoring of working hours and the work-life balance of employees. The inadequate organization of working hours may have a negative impact on the well-being of subcontractors' and suppliers' employees (overwork, depression, or increased accident rates).
- A lack of high-quality **social dialogue** and **freedom of association** may have a negative impact on the well-being of subcontractors' and suppliers' employees. A lack of, or deterioration in, social dialogue increases the risk of discrimination and the risk that human rights and worker protection rules will be breached.

- **Compensation and the question of decent wages** are also a major issue in terms of working conditions, as they are directly correlated with quality of life and the satisfaction of basic needs (ability to feed oneself, find housing, etc.).

Working hours and respect for social dialogue have been identified as potential issues in the supply chains of Bolloré Innovative Thin Films, Blue and Systems due to the nature of their activities, which are based on complex, international supply chains across a variety of regions in which these issues may not be dealt with, or may be inadequately dealt with, under local laws. These issues may affect all workers in the supply chain, and are more likely to impact workers at companies based in territories in which laws on working hours are non-existent, not complied with or are not in line with the International Labour Organization's conventions. The issue of decent wages has also been identified as a potential issue in the supply chains of all the Group's businesses, below Tier 1.

### 3.2.1.2. HEALTH AND SAFETY IN THE SUPPLY CHAIN

Issues linked to the health and safety of workers in the value chain cover the risk of industrial accidents, identified as material for Bolloré Energy, and the risk of accidents associated with the extraction of raw materials for the Blue and Systems divisions:

- petroleum products are stored at Bolloré Energy's industrial sites, but these sites do not pose high accident risks. However, as the flammability of heating oil and diesel is triggered at very high temperatures (over 65 °C), an accidental fire could have potentially serious consequences, exposing both direct employees and subcontracted workers to a high level of risk. It should be noted, however, that like all the Group's divisions, Bolloré Energy engages very few subcontracted workers at its sites. The third parties who may potentially be affected by health and safety issues arising from industrial activities are mainly temporary workers;

- as part of their production activities involving the use of ores, the issues associated with the extraction of raw materials (lithium, metals, etc.) have been identified for the Blue and Systems divisions. These activities manufacture products that contain metals and a variety of ores present in components or subcomponents, and the extraction sector is potentially exposed to serious accident risks due to a number of factors. Working conditions in underground mines can be dangerous, and sometimes require workers to handle chemical and toxic substances and products, as well as explosives. These issues affect subcontractors and suppliers well beyond Tier 1. It should be noted, however, that Systems' subsidiaries activities involve assembling components. No ores are purchased directly, the volumes present in the products are insignificant, and their suppliers are mainly French or European.

### 3.2.1.3. FORCED LABOR AND CHILD LABOR IN THE SUPPLY CHAIN

Forced labor and child labor issues have been identified as potentially affecting subcontractors in Bolloré Innovative Thin Films, Systems and Blue's raw material supply chains. In connection with their manufacturing activities, these issues, which give rise to risks of violations of fundamental rights (degrading working conditions, deprivation of freedom, or denial of the right to education), may impact subcontractors and suppliers below Tier 1. The supply chains for the Group's industrial activities are complex and involve a variety of regions in which these issues may not be dealt with, or may be inadequately dealt with, under local laws, with products and services that may sometimes be limited by a restricted competitive environment. The supply of ores required for battery production activities, as well as certain mining-derived components incorporated into the products manufactured by the Systems business, is associated with risks of human rights abuses. This issue is particularly significant for strategic raw materials mined in remote regions. This is why the Group does not currently have access to all the information it needs to provide complete transparency on these links in the value chain, and cannot therefore provide any guarantee that all the

principles on preventing forced labor and child labor drawn up by the reference organizations (ILO and OECD) are implemented at these levels.

The Bolloré Group's approach to ESG matters and its business strategy have always taken these issues into account. There could, however, be a risk that revenue would fall in the event of a failure in the value chain or a disruption to production activity with a supplier. Health, safety and human rights issues and, more specifically, forced labor and child labor issues, are also an absolute priority for the Group in terms of prevention and action. The Group's ethics policy includes the option of terminating a business relationship in the event of serious breaches or violations of the Group's ESG commitments.

In addition, the issues associated with the supply of ores are discussed by the Ethics – CSR and Anticorruption Committee and at meetings with operational teams. Certain materials are identified as strategic because they are directly linked to the product manufacturing process. They are therefore integrated into the company's business model, and suppliers that are identified as strategic undergo a rigorous selection process that may include site visits.

### 3.2.1.4. REPUTATIONAL AND FINANCIAL RISKS

Negative impacts related to working conditions and human rights issues for workers in the value chain are also associated with reputational risks insofar as a serious violation affecting a worker in the supply chain, linked to forced labor, child labor or a serious accident, could result in a media controversy, which could severely damage the company's image.

A financial risk has also been identified. The Group reserves the right to terminate a contractual relationship in the event of a serious breach by a supplier or subcontractor, potentially causing disruption to business activity and leading to a fall in revenue.

## 3.2.2. POLICIES RELATED TO WORKERS IN THE VALUE CHAIN (S2-1)

The Group strives to implement a governance system that is based on international standards and that reflects its values in the countries in which it operates in full compliance with local and international regulations. The Group is focusing its efforts on the implementation and deployment of measures to enable it to exercise reasonable duty of care with regard to suppliers and subcontractors, in line with the measures in place for its own employees.

As a signatory to the United Nations Global Compact since 2003 and having made this issue a fundamental pillar of its CSR strategy, the Bolloré Group has formally included commitments on the promotion of decent and safe working conditions and strongly condemns the direct or indirect use of forced and child labor in its Group ethics system, consisting of the Code of Conduct, the Group Ethics and CSR Charter, the Responsible Purchasing Charter, the Diversity and Inclusion Charter and the Human Rights Charter. These constituent documents of the Bolloré Group's ethics system, which are sent to business partners, suppliers and subcontractors, cover ESG issues relevant to workers in the value chain, and deal specifically with the issues of human trafficking, forced labor and child labor.

- The Code of Conduct sets out the expected behaviors of all persons acting on behalf of the Bolloré Group and formalizes recommendations to prevent, identify and report contrary actions. It is sent to all suppliers and subcontractors before the contractual relationship is entered into.

- The Ethics and CSR Charter, signed by Cyrille Bolloré, the Group's Chairman and Chief Executive Officer, lists the major commitments associated with the Group's strategic priorities. It forms the basis of the Group's fundamental commitments from which the more in-depth policies or procedures are derived according to the issues identified as priorities. It also formally documents the Group's commitment to ensuring that workers' rights are respected throughout its value chain, and to deploying a duty of care-based approach to human rights issues.
- The Group's Charter of Human Rights and the Group's Responsible Purchasing Charter integrate and strengthen these ethical measures by structuring a specific approach around these issues. The Responsible Purchasing Charter also details the commitments expected of the Group's suppliers and subcontractors. These documents are backed by international standards, including:
  - the International Charter on Human Rights;
  - the UN Guiding Principles on Business and Human Rights;
  - the OECD guidelines for multinational companies;
  - the International Labour Organization's fundamental conventions; and
  - the recommendations of the French Anticorruption Agency.



These documents state that the Group's contractors and business partners must subscribe to these principles.

It should be noted that the Group also applies a Diversity and Inclusion Charter, signed by the Head of Human Resources, which documents the Group's commitments to promoting non-discrimination and diversity. This document states that any discrimination against workers on grounds such as ethnicity, sex, religion, public opinion, sexual orientation and national or social origin is damaging to collective cohesion. This Charter sets out the roles of the Group's various divisions in implementing its principles both internally and with their respective service providers, recruitment agencies and partners.

The health and safety policies and industrial accident prevention measures deployed by the Group's operating entities must also be applied by third parties. Employees of subcontracting companies are bound by the requirements included in the standards that apply to the Group's employees. They are subject to the same health and safety analysis and performance indicators, whether these arise from regulations or contractual clauses. Risks linked to concurrent activities with external companies are also analyzed and specific prevention and protection measures are identified.

In addition to these documents, which also underpin its approach to sustainability, the Bolloré Group's Purchasing Department also applies various policies and procedures to its different purchasing categories.

- Each division has dedicated in-house teams for purchases linked to the Group's production activities. Purchasing teams for production activities ensure that all new suppliers sign the Responsible Purchasing Charter and apply selection processes that incorporate CSR aspects. The purchasing system applied by the Systems division is based on only selecting suppliers that comply with the European RoHS (Restriction of Hazardous Substances) directive, which restricts the use of hazardous substances in electrical and electronic equipment.

A purchasing policy approved by the Chief Executive Officer is applied by the Blue division's businesses, together with a purchasing procedure common to the various businesses. The division also applies a supplier classification system for all its business activities. Purchases are identified using a defined nomenclature and classified by impact, based on their importance to the final product. Raw materials are classified as Class 1,

and Blue's purchasing teams use systems and procedures to increase their traceability. As a result, the main ores used in the products manufactured by Blue's subsidiaries come from the world's major deposits, such as Indonesian, Australian and Brazilian mines. It should be noted that Blue's business lines do not buy ores directly. In manufacturing batteries and, more specifically, the anode and cathode, Blue Solutions uses ten or so different suppliers of materials to source lithium metal, i.e. lithium that has already undergone at least two conversion processes. For the anode, over 95% of the lithium is sourced from a single wholesaler, producer and the market leader in Australia, whose processing sites are ISO 14001, ISO 45001 and ISO 9001 certified. For the cathode, lithium is purchased in carbonate or hydroxide form, as part of a mixture of materials containing other substances.

Since 2023, however, purchases of lithium or components that may contain ores, have been minimal and have only been made in small quantities. Indeed, 2024 was a transition year between two generations of battery. The company's strategy was to sell off its Gen3 stocks and to start developing future suppliers for the next generation. Blue Solutions is working on developing its Gen4 battery, which is not yet on the market. Nothing is being produced on an industrial scale and the buyers are therefore participating in R&D efforts and are not committing to large industrial purchasing volumes. For this reason, the purchasing policy processes for the Gen4 batteries are currently in the process of being developed.

- Non-production or general purchases are covered by a responsible purchasing policy that describes the CSR and duty of care monitoring processes to be deployed according to the risks identified. Criteria taking CSR and human rights into account are included in an 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 20 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.).

More specifically, any subcontracted workers at the Group's sites are subject to the same QHSE rules as direct employees and are governed by the same processes. In the event of a workplace accident, analysis is carried out using a causal tree, just as for salaried workers.

### 3.2.3. INTERACTION PROCESSES WITH VALUE CHAIN WORKERS (S2-2/SBM-2)

While there is no formalized dialogue process for all Bolloré Group's workers in the supply chain, different functions may have responsibility for engaging in dialogue with them:

- 1) commitments related to workers' rights are formally documented in the Group Responsible Purchasing Charter, signed by the Group Chief Officer Purchasing;
- 2) the consideration of workers' rights is incorporated into discussions with suppliers at a number of stages:
  - for non-production purchases, the systematic inclusion of CSR clauses in contracts and the transmission for signature of our ethical guidelines (CSR Charters and Code of Conduct) may result in exchanges and discussions in which the Group's buyers and legal experts may have to train the supplier on, or raise its awareness of, the Group's ethical commitments. Accordingly, these exchanges take place in advance of the contractual relationship – during the selection phase or before the signature of a contract, or as part of an annual business review,
  - for production purchasing, the processes used to select strategic suppliers include environmental, human rights and health and safety criteria, which require advance discussions. In addition, issues related to workers' rights may be incorporated during site visits or audits. Accordingly, these exchanges take place in advance of the contractual relationship – during the selection phase or before the signature of a contract, or as part of an annual business review;

- 3) workers from subcontracting companies or suppliers who are involved in operations are also subject to the same health and safety rules and processes as direct employees, and may therefore interact with the QHSE managers at the relevant sites. Strict monitoring is carried out by industrial entities, particularly those for which significant health and safety challenges have been identified. In the case of Bolloré Energy, for example, subcontractors and service providers working at massive depots are required to follow a specific induction program. A prevention plan is systematically signed by the entity and the contracting company, which serves to provide information and raise awareness about the risks associated with the facilities. A safety protocol setting out the main instructions and operating procedures that need to be followed must be signed in advance by carriers carrying out loading or unloading operations at the massive depots. Service providers are also invited to discuss the safety and intervention rules every year applicable at Seveso upper tier sites, as part of an expanded Occupational Health and Safety Committee.

### 3.2.4. DESCRIPTION OF CHANNELS THROUGH WHICH VALUE CHAIN WORKERS CAN EXPRESS THEIR CONCERNS (S2-3)

The whistleblowing system enables employees of the Bolloré Group companies and its external and occasional partners to alert it of a crime or an offense, a breach of the law or regulations, a threat to the general interest, or a failure to follow the Bolloré Group's Code of Conduct (aligned with the UN Guiding Principles, the ILO Declaration on Fundamental Principles and Rights at Work and the OECD guidelines) resulting from the activities of Group companies or of their subcontractors or suppliers.

This system, which can be accessed from the Bolloré Group's website and at [alert.bolloré.com](mailto:alert.bolloré.com), enables individuals to report actions that go against its anticorruption policy or that violate human rights. It is also incorporated into the Responsible Purchasing Charter, which is provided in advance of all contractual relationships being entered into and details the Group's commitments to the stakeholders in its supply chain.

The use of the system requires the whistleblower to be identified, unless the report provides sufficient details to establish the severity of the facts. Reports are processed by specially authorized persons covered by an obligation of confidentiality.

Alerts are received by whistleblowing officers within the scope of their functions, specially designated by mutual agreement by all Group companies using the whistleblowing system by virtue of their position, competence, authority and resources to review the admissibility of alerts and initiate or coordinate the ensuing investigation. Each one is supported by a small team of Bolloré SE employees specially authorized to carry out the corresponding tasks and subject to the same obligations as the officer, notably in terms of enhanced confidentiality and training. The officer and their team may be assisted in their duties by any authorized third party appointed by the officer based on their expertise and/or impartiality, including a lawyer, expert or

auditor, provided that they provide appropriate guarantees on the protection of personal data and are personally subject to an enhanced obligation of confidentiality, either contractually or by law.

The Group protects whistleblowers who act in good faith from any form of reprisal. This whistleblowing system supplements but does not replace other internal reporting methods (such as the managerial reporting line).

The perpetrators of any prohibited behavior established following a process in which both parties are heard, may be subject to disciplinary sanctions or legal proceedings in accordance with the applicable law.

If a whistleblowing alert is accepted, it is investigated with a view to establishing whether the facts are material and what action, if any, needs to be taken. The officer and their team launch or coordinate the investigation into the materiality of the breaches and the liability of the persons involved. This investigation may be carried out with the support of one or more authorized third parties, or if, due to the circumstances, the matter needs to be dealt with on a fully outsourced basis to ensure the impartiality of the investigators, by such third parties. If the materiality of the facts and the liability of the persons involved are established:

- disciplinary and/or legal proceedings may be brought against the person(s) involved;
- appropriate remediation (reorganizations, introduction of new procedures), prevention or mitigation measures (field audits, dialogue with stakeholders, corrective action plans) are deployed.

In 2024, no serious issues or incidents concerning human rights or the working conditions of indirect workers were reported via the Group's alert system.

Details of the procedure for collecting and processing alerts are available on the Bolloré Group's website.

### 3.2.5. DESCRIPTION OF ACTION PLANS IMPLEMENTED IN FAVOR OF WORKERS IN THE VALUE CHAIN (S2-4)

The implementation of the responsible purchasing approach is reflected in particular in:

- 1) **a due diligence approach** in the selection of suppliers and subcontractors, which systematically receive information on the Group's ethical measures before entering into the contractual relationship so that they can comply with them. Although the supplier selection and evaluation process is not consolidated in a single management tool, the Group Purchasing Department and the subsidiaries take account of ethical and compliance criteria in their purchasing process, above and beyond the standard financial, administrative and technical criteria required to fulfill the Group's commitments; a policy for assessing the integrity of suppliers and subcontractors has been formalized by the Compliance Department. This due diligence approach addresses the negative impacts identified;
- 2) **a Responsible Purchasing Department** working to strengthen human rights aspects in ethics procedures and centralize data collection;
- 3) the drafting and inclusion of a **CSR clause and an anticorruption and compliance clause** in contracts, illustrating the implementation of the Group's responsible purchasing approach. Guidelines have been established and specific information meetings have been organized to support company lawyers and purchasing teams in negotiations with business partners regarding the inclusion of this clause.

The CSR clause contractually documents the supplier's or the subcontractor's commitment to complying with all national and international standards on social and human rights, ethics and compliance issues, as well as the environmental issues relevant to its business activities, and to promoting and ensuring compliance with the rules and principles derived from:

- the United Nations Global Compact and the International Charter on Human Rights, which includes the Universal Declaration of Human Rights adopted by the UN on December 10, 1948, as well as the International Covenant on Economic, Social and Cultural Rights and the International Covenant on Civil and Political Rights adopted in 1966,
- the ILO Tripartite Declaration on Fundamental Principles and Rights at Work, as revised in March 2017, and the ten related fundamental conventions (no. 29, 87, 98, 100, 102, 105, 111, 138, 156 and 182),
- the UN Guiding Principles on Business and Human Rights,
- the OECD guidelines for multinational companies.

By signing the CSR clause, the supplier or subcontractor also undertakes to comply with the principles set out in the Responsible Purchasing Charter, which enshrines the Group's commitment not to tolerate any use of child or forced labor, and the supplier's or subcontractor's undertaking to guarantee decent working conditions, clear working hours, freedom of association, and decent wages;

4) **action plans** are deployed by the purchasing teams:

- with regard to non-production or general purchases, the dedicated responsible purchasing policy describes the procedures for issuing due diligence questionnaires that incorporate sustainability criteria. The analysis of the answers includes the use of an external screening tool that identifies any CSR-type controversies that may arise with each company. The questionnaire is sent as a priority to suppliers identified as posing the greatest risk under the chosen mapping, and calls for corrective action based on the information provided. Non-production purchases use the mapping of ethical and anticorruption risks, as well as a country criticality index to identify the territories that pose the greatest risk in terms of human rights. In 2024, this criticality index was incorporated into the Group's new purchasing management platform, which will be completed in 2025. Purchases identified as being at risk are then referenced on the EcoVadis platform. The responsible purchasing approach for non-production purchases also includes the automatic referencing of all strategic suppliers on EcoVadis, regardless of the level of risk identified. The EcoVadis assessment results in a rating for the supplier's ESG performance, with any score below 40 leading to the issue of a corrective action plan. These processes are currently being redesigned and will be updated in 2025. The sale of our transport and logistics businesses in 2024 required us to replace certain systems and renegotiate certain contracts with service providers such as EcoVadis,
- with regard to production purchases, out of the actions and tools deployed, Blue's purchasing teams use a specific questionnaire sent to all major suppliers in advance of the contractual relationship. The questionnaire includes questions on environmental management, health and safety, product life cycles, sustainability and human rights issues. Blue and Bolloré Innovative Thin Films carry out annual risk assessments on their suppliers, involving various departments (purchasing teams, QHSE teams,

design office, etc.). As a result of their strategic nature, suppliers of raw materials are subject to in-depth monitoring, which is currently being formally documented. Blue Solutions is currently working on developing its Gen4 battery, which is not yet on the market, as part of an industrial process. In this respect, the teams are working on improving a purchasing system that ensures that due diligence is carried out on human rights and traceability issues, in line with European regulations on batteries. By way of example, a procedure for classifying supplier risks and a questionnaire specifically on sustainability issues associated with ores are currently being drafted.

Depending on the issues identified in advance, CSR criteria can also be integrated into any QHSE visits or audits that may be carried out at a supplier or subcontractor's sites. Accordingly, the Systems businesses organize various supplier audits each year, based on the criticality of delivered products that are subject to severe supply constraints (limited availability, technical complexity or dependence on supplier with a monopoly), forcing purchasing teams to intensify their sourcing work and identify alternative suppliers.

A supplier audit may also be justified if non-conformities are identified in the purchased product. The quality teams at IER and Automatic Systems each use a specific audit questionnaire.

The Group's CSR Department has also drawn up audit grids to be used by the entities. Corrective action must be taken if a non-conformity is identified.

In addition, human rights issues in the value chain fall within the Social aspects of the Group's CSR strategy (Developing safe working conditions for all, including in our value chain) and, as such, are discussed at least annually by the CSR Department and the Group Human Resources Department. If an issue is identified, a Group action plan or dedicated project may be deployed.

### 3.2.6. DESCRIPTION OF OBJECTIVES ASSOCIATED WITH THE MANAGEMENT OF IROS LINKED TO VALUE CHAIN WORKERS (S2-5/MDR-T)

Targets have been set internally in respect of the management of IROs relating to the supply chain. They were identified and proposed by the Group CSR Department to senior management at a meeting of the Ethics – CSR and Anticorruption Committee, as well as to operational teams at meetings of the steering committee, at which they were validated.

#### 3.2.6.1. NON-PRODUCTION PURCHASES

The objectives are annual and renewed from one year to the next:

- distribution of the Responsible Purchasing Charter sent to 100% of centrally managed non-production suppliers:  
– target achieved in 2024. The Responsible Purchasing Charter has also been signed by 98% of centrally managed non-production suppliers;

- CSR clauses are included in 100% of contracts with new suppliers:  
– target achieved in 2024.

#### 3.2.6.2. PRODUCTION PURCHASES

Production purchases cover the categories of purchases directly involved in the manufacture or development of products and services provided by the Bolloré Group's subsidiaries. The Group is working on strengthening its responsible purchasing strategy and processes and its objectives include:

- providing the Responsible Purchasing Charter to 100% of new strategic suppliers<sup>(1)</sup> by 2026;
- include the CSR clause in 100% of contracts with new strategic suppliers<sup>(1)</sup> by 2026.

In 2024, Bolloré Energy was the only entity to formally document a monitoring system to ensure that the indicators on the distribution of the Charter and the integration of the CSR clause were reliable. All Bolloré Energy's suppliers have been sent the Responsible Purchasing Charter and were offered the incorporation of a CSR clause in their contract.

Through these objectives, the Bolloré Group ensures that the commitments it has made on safeguarding human rights are shared by its suppliers and subcontractors, and contractually agreed to as part of the business relationship. The Responsible Purchasing Charter formalizes the Group's commitments concerning the negative impacts relating to working conditions, health and safety, as well as the issues of forced labor and child labor within its value chain.

(1) Tier 1 suppliers for purchases of raw materials used in the manufacturing of products.

### 3.3. Facilitating commitments by customers by taking account of issues affecting consumers and users of our products (ESRS S4)

Specific material issue	Impact/risk/opportunity	Description	Scope concerned
<b>Protection of the personal data of consumers and end users</b>	Negative impact	Breaches of privacy: leaks of personal data of consumers/end users (e.g. management of data using Smart Mobility Platform/data concerning personal mobility)	Systems
	Legal risk	Sanctions such as fines and legal costs for breaches of privacy and compliance with personal data laws (RGPD)	Systems
<b>Safety of consumers and end users</b>	Negative impact	Physical well-being: • bus: road safety risk for users; • batteries: defective products (e.g. internal battery safety features/safety performance of batteries during intensive use, safety of recharging terminals)	Blue
		Physical harm due to non-compliance or product safety failings (e.g. toll gates)	Systems
	Financial risk	Loss of customers and adverse impact on Blue Solutions' development in the event that defective products are put on the market (e.g. internal battery safety features/safety performance of batteries during intensive use)	Blue
	Reputational risk	Media controversies related to user safety that could adversely impact the company's image	Blue

#### 3.3.1. DESCRIPTION OF MATERIAL IMPACTS AND INTERACTIONS WITH BUSINESS STRATEGY (SBM-2 AND 3)

The material issues affect Blue Solutions and the Systems division.

##### 3.3.1.1. DESCRIPTION OF CONSUMERS AND END USERS

###### BLUE

Blue groups together the Bolloré Group's e-mobility businesses, including the production of LMP® electric batteries, the production of clean transport solutions and the marketing of energy storage solutions. In the LMP® battery production business, Blue Solutions' direct BtoB customers are principally manufacturers of electric urban buses. The battery technology offered by Blue Solutions is particularly well suited to this type of intensive daily use. The vehicles are then sold to public transport operators, whose passengers constitute the end users of the batteries. Our customers also include our subsidiary Bluebus, which supplies clean and silent mass transit solutions to customers including major cities such as Paris and Brussels, as well as public transport operators such as the RATP. In this

respect, the most vulnerable end users are the diverse users of these battery-powered vehicles (drivers, daily users, tourists, workers, people with reduced mobility, etc.) with specific transport needs. In terms of health and safety impacts, physical well-being is an identified risk for users of these vehicles in the event of faulty batteries. Assembly defects or non-compliance with battery recharging and storage procedures may give rise to fire risks. Media controversies resulting from the marketing of defective products pose a reputational risk that would damage the company's image, and the loss of customers resulting from such controversies represents a financial risk.

###### SYSTEMS

Systems brings together a number of the Bolloré Group's industrial activities, and focuses on the development and production of a range of solutions and equipment to optimize flows of people, materials and data. The customers of the Systems' businesses range from companies to public bodies. IER's main customers are operators of public sites associated with transport (airports, train stations, etc.), as well as public authorities. Automatic Systems (AS)'s main customers are integrators and operators of comprehensive solutions (for whom AS acts as an equipment supplier), as well as builders and installers. As such, their consumers and end users may include any individual who needs to access a restricted area (business premises, parking lots, freeways, train station platforms or airport departure lounges).

The management of the risks associated with the protection of personal data does not fall within the scope of Systems' direct operations. The risks identified relate to the management of personal data in employees' HR files and to the processing of the contact details of Systems' suppliers and are not therefore of a systemic nature. However, IER and AS meet the cybersecurity standards imposed by their customers, as well as the regulatory obligations on the protection of the personal data of their internal and external workers and their customers. In terms of health and safety issues, certain individuals, such as children hiding behind their parents when passing through facilities and elderly people, who are less able to react quickly, may be at risk of injury when using certain automated access products (e.g. closing doors). That is why IER and AS pay particular attention to the safety of vulnerable people when designing their products.

### 3.3.1.2. LINKS WITH BUSINESS STRATEGY

#### BLUE

Blue Solutions' business strategy fully covers the management of health and safety risks that could potentially impact the consumers and end users of its products, as early as the design phase. As a "solid-state" solution, the products are able to withstand extreme outside temperatures and have the added advantage of eliminating the risks associated with the release of hazardous products. LMP® batteries are exempt from SVHC (Substance of

Very High Concern) rules under the European REACH regulation and CMR (carcinogenic, mutagenic or toxic for reproduction) rules under the European CLP (classification, labeling and packaging) regulation. These batteries are therefore ideally suited to the operating requirements of urban and suburban transport vehicles, and their design, which offers a high level of security, constitutes a further competitive advantage.

#### SYSTEMS

A defective product, or one that does not comply with user safety standards, could give to controversies and the risk of losing customers. That is why Systems' business strategy fully covers that management of health and safety risks that could potentially impact the consumers and end users of its products, as early as the design phase. Mastering these user safety issues is a real competitive advantage for Systems, and its businesses are renowned

for the robustness of their products and the sharpness of their detection technology, which helps to prevent accidents. The Group's entities also apply a quality policy, which ensures that they comply with certain standards and safety processes in developing their products, ensuring that their design complies with regulations and that tests are carried out before products are put on the market.

### 3.3.2. PROTECTION OF THE PERSONAL DATA OF CONSUMERS AND END USERS

#### 3.3.2.1. POLICIES ON THE DATA OF CONSUMERS AND END USERS (S4-1)

The risk associated with failing to protect personal data affects all the Group's companies and has been identified as a material risk for Systems. The Systems entities are covered by the personal data protection compliance program deployed by the Bolloré Group as soon as the GDPR was adopted in 2016. This program was built around the following stages:

- coordination of the subject by top management (the Group DPO is in direct contact with the Deputy CFO, who supports and validates the GDPR strategic directions and attends meetings of the Management Committees);
- continued appointment of officers known as "correspondants informatique et libertés" and then, from May 2018, DPOs;
- establishment of a dedicated Steering Committee;
- establishment of an ad hoc DPO support unit for each division (comprising the Chief Information Officer, a legal expert and a member of the division's human resources team);
- generalized roll-out of training courses (training for Executive management, the Legal Department, members of the GDPR steering committee, the Group's management, an e-learning program for all employees, particularly those in the Systems division, etc.);
- drafting of the first governance-related documents to be applied by the divisions, including:
  - mapping of data processing activities,
  - data incident management procedure,
  - procedure for handling requests from data subjects to exercise their rights,
  - processing register.

The Bolloré Group is also aware of the issues relating to the processing of personal data and the supervision of their use, and has incorporated into its Code of Conduct, which is followed by the Systems division, the personal data protection principles that govern the protection of data provided by third parties (e.g. service providers and customers, etc.) and, more broadly, by any data subject (e.g. employees and site users, etc.). They are set out in internal rules and procedures, to ensure that they are universally complied with over the long term.

Lastly, the Group Personal Data Governance Charter introduced in December 2022 sets out the main principles and behaviors to be adopted and defines the rules and their implementing procedures. In line with the commitments set out in the Group's Code of Conduct, the rules form the basis of the personal data protection compliance system applicable to the Group, including therefore Systems' businesses, and apply to all forms of data processing carried out by the divisions, either in their capacity as data controller or data processor, and regardless of their country of establishment insofar as the GDPR applies.

In accordance with the Group's Personal Data Governance Charter, made available to employees by the Data Protection Officer on the dedicated intranet site, Systems applies a procedure within its organization that enables end users/consumers (hereinafter referred to as "data subjects") to exercise their rights under the applicable regulations, save in the event that the system is clearly being misused.

This procedure must enable data subjects to:

- obtain confirmation on whether their personal data is or is not being processed;
- access and obtain a copy of their personal data;
- obtain, in accordance with applicable laws, information on the data processing;
- rectify their personal data, provided that they can provide evidence that such data is inaccurate or incomplete;
- have certain personal data deleted in the cases provided for by applicable laws;
- restricting the processing of certain data, in the cases provided for by applicable laws;
- have the personal data they have provided returned to them, in the cases provided for by applicable laws, so that they can be transferred to a third party;
- object, in accordance with applicable laws, to the processing of their personal data, for reasons relating to their particular circumstances.

#### 3.3.2.2. CONSUMER AND END USER ENGAGEMENT PROCESS ON DATA PROTECTION ISSUES (S4-2)

The Systems business, which specializes in the automation of secure entry controls, designs and manufactures pedestrian and vehicle access equipment. Control over the processing of personal data is a matter of great importance for the entity, which has decided not to collect any personal data from the users of its products, transferring the responsibility for controlling personal data processing onto its customers. Nevertheless, the Systems business forms part of the Bolloré Group's DPO network and has its own Data Protection Officer. The Data Protection Officer is the first point of contact in the division for all personal data protection issues. They are responsible

for implementing the principles set out in the Group's Code of Conduct and Governance Charter on the protection of personal data for their division. The Data Protection Officer also attends meetings of the Steering Committee, which meets two or three times a year and is attended by Data Protection Officers (DPOs), other specialists, legal experts, and representatives from information systems, human resources, purchasing, etc. The aim is to review the actions currently being implemented and determine the next stages of deployment.

Systems uses internal and external communications to publicize the appointment of its Data Protection Officer, publishing their work contact details on the Group intranet and including their generic address in all information notices.

Data subjects are reminded of their rights in all information notices (information, access, rectification, erasure, right to be forgotten, restriction of processing, data portability and objection).

In accordance with the procedure for managing requests to exercise rights, data subjects (employees, service providers, customers, suppliers, etc.) can write to a generic e-mail address managed directly by the Data Protection Officer. In accordance with applicable regulations, Systems undertakes to

respond to standard requests within one month of receipt, and to exceptionally complex requests within two months of receipt.

An initial assessment was carried out by the Bolloré Group's Internal Audit Department in May 2024, which identified strengths and areas for improvement for each of the Group's divisions, including the Systems businesses. These areas for improvement have been identified by the divisions and converted into action plans that are monitored at monthly meetings organized by the Group DPO Department.

An annual report managed by the Group DPO Department monitors changes in the number of requests submitted by data subjects and the internal and external risks to which the Systems businesses may be exposed.

### 3.3.2.3. DESCRIPTION OF CHANNELS THAT MAY BE USED BY CONSUMERS AND END USERS TO RAISE ANY CONCERNS THEY MAY HAVE (S4-3)

There are two channels through which employees and third parties are able to report data breaches:

- all data subjects (employees, customers, suppliers, service providers, etc.) can write to a generic e-mail address directly linked to Systems' Data Protection Officer so that they remain aware of requests and can take the necessary actions. Information notices are included in all internal and external communications, reminding them of the DPO's details, the rights of data subjects and the option of contacting the relevant supervisory authority;
- a Group whistleblowing system that enables employees of the Bolloré Group companies and its external and occasional partners, including those in the Systems division, to alert it of a crime or an offense, a breach of the

law or regulations, including the GDPR, a threat to the general interest, or a failure to follow the Bolloré Group's Code of Conduct resulting from the activities of Group companies or of their subcontractors or suppliers. This system is available on the Group's website and at [alert.bolloré.com](mailto:alert.bolloré.com). The use of this system requires the identification of the whistleblower, unless the report provides sufficient details to establish the severity of the facts. Reports are processed by specially authorized persons covered by an obligation of confidentiality. The Group protects whistleblowers who act in good faith from any form of reprisal. This whistleblowing system supplements but does not replace other internal reporting methods (such as the managerial reporting line).

### 3.3.2.4. DESCRIPTION OF INITIATIVES IMPLEMENTED FOR CONSUMERS AND END USERS (S4-4)

The strengthening of legal provisions on personal data protection in Europe and the increasing digitalization of Systems' activities require systems able to reassure individuals (employees, suppliers, service providers and customers, etc.) that their personal data remain secure and are processed securely.

In response to these new data governance requirements, the Systems businesses, driven by the Bolloré Group, attend meetings of the dedicated Group Steering Committee, whose main duties are to:

- provide tools and procedures governing the protection of personal data (e.g. register of data processing activities, impact analysis procedure, security incident management procedure, etc.);
- define actions/action plans to reduce the risks incurred by the physical persons identified within the scope of personal data processing mapping;
- harmonize the practices put in place in the various companies.

Since 2019, all Systems employees have taken a mandatory online training (e-learning) module on personal data protection. This module is supplemented by face-to-face sessions with employees, hosted by the Data Protection Officer and the Group DPO. In 2023, the e-learning course was revamped to raise awareness among Group employees of the main principles governing personal data protection and the procedures to be applied in the event of a possible data breach. For the 2024 e-learning campaign<sup>(1)</sup>, 67.92% of Bolloré Group's employees, including those in the Systems division, successfully completed their training.

The supplier selection procedures applied by the Group DPO Department also help to protect the personal data of data subjects. Evaluation questionnaires are used to determine the degree of risk to which the company is exposed as early as the invitation to tender stage and form the basis of the supplier evaluation carried out by the Data Protection Officer. A positive opinion from the Data Protection Officer is required before any contractual relationship can be entered into.

In order to mitigate the external risks to which Systems may be exposed, technical and organizational security measures appropriate to the sensitivity of the data and processing operations have been put in place and documented in registers in order to prevent the unauthorized or illegal processing, accidental disclosure or loss, destruction or deterioration of the personal data, and to prevent it being accessed by unauthorized persons.

In accordance with the Group's Personal Data Governance Charter, these actions and procedures are evaluated each year as part of the annual reporting process managed by the Bolloré Group's DPO Department. A questionnaire containing 30 or so questions and divided into 5 themes is sent to each entity's Data Protection Officer in order to measure their awareness and the dissemination of the procedures introduced by the Group.

The results of this annual report are presented to the Steering Committee of the Group DPO Department.

(1) Campaign from December 6, 2023 to February 28, 2024.



### 3.3.3. SAFETY OF CONSUMERS AND END USERS

#### 3.3.3.1. POLICIES ON THE SAFETY OF CONSUMERS AND END USERS (S4-1)

The double-materiality assessment highlighted the risk to the health and safety of consumers and end users associated with Blue's activities in the event of battery failure, the risk associated with Systems' activities in the event of a product malfunction. The health and safety of persons is a fundamental commitment for the Bolloré Group and its subsidiaries, both for the people directly or indirectly involved in its activities and for the consumers and end users of its products and services. Through its Ethics and CSR Charter and its Human Rights Charter, the Bolloré Group has formalized its human rights commitments, including issues related to the health and safety of individuals. These charters are also aligned with international standards such as the UN Guiding Principles, the ILO's international conventions and

the OECD's guidelines. The issues of quality and customer satisfaction, to which the safety of consumers and end users is linked, are a priority for the Group's subsidiaries. This is reflected in their guarantee that products will be manufactured in line with the highest safety standards, and that these issues will be monitored from the design phase right through to their launch on the market. In the event that a consumer or user suffers a physical injury, an investigation must be carried out to determine whether the accident was in fact caused by a product defect. If the Group is held liable, remedial measures will be based on the applicable legal provisions. In 2024, the Bolloré Group was not aware of any reports of incidents, accidents or matters that breached the principles set out in its ethics system.

#### BLUE

The issues of quality and customer satisfaction are a priority for the Group's subsidiaries. This is reflected in their guarantee that products will be manufactured in line with the highest safety standards, and that these issues will be monitored from the design phase right through to their launch on the market.

Blue's policy is to factor these issues into the product design stage. As end consumers are impacted by mobility challenges, the production of batteries and buses forms part of the automotive industry's methodology. Blue carries out a FMECA (Failure mode, effects, and criticality analysis), a traditional tool that is key to the production of safe products, and performs these analyses both upstream and downstream, at every stage of battery design. Blue has also made commitments on the lifespan and quantity of energy delivered linked to use by customers, and on compliance with regulatory approvals, including R100 (sealing tests, electrical criteria, etc.) specific to the automotive

sector, which lists a number of requirements, such as the minimum number of minutes in which a bus must be evacuated. The division's "Promoting sustainable development" health, safety and environment policy, signed by the Chief Executive Officer, covers all its activities and includes a section on "Reducing the environmental impact of our business activities". It formally documents our commitment to placing the operational safety of product at the heart of Blue's development strategy.

Since Blue is not responsible for operating the vehicles, it is the operator's policy on preventing and managing health, safety and human rights risks that may impact end users. The Group's whistleblowing system may, however, be used by third parties, enabling any interested party to submit a report or complaint concerning risks of serious human rights or health and safety violations.

#### SYSTEMS

Systems' policy is to factor these issues into the product design stage. Its subsidiaries, IER and AS, are required to apply certain safety standards, and follow the ISO 9001 guidelines. The application of the health, safety and quality policies ensures that legal rules and standards are complied with, which reduces the risk of disputes or sanctions, as well as the risk of product defects. The policy implemented by, and for, IER and AS must enable strategic objectives to be achieved, a number of which relate to consumers and end users:

- being recognized as a key provider of solutions to customers;
- increasing the company's focus on customer satisfaction by meeting deadlines and quality commitments;
- meeting compliance obligations on an ongoing basis;

In addition, in line with the ISO 9001 and 14001 standards, stakeholders' needs are taken into account in the regularly updated quality and environment management system, which formally documents various aspects concerning customers and users, and which is implemented by the QHSE departments.

##### In relation to customers:

- compliance with applicable standards and regulations;
- compliance of the proposed solution with requirements under tender processes (technical, physical and IT security, regulatory compliance, accessibility for persons with reduced mobility, customer pathway, etc.);
- the certification and approval of solutions (verifying compliance with specifications, verifying compliance with applicable standards and guidelines – electromagnetic compatibility, electrical safety, radio frequencies, shock, waterproofing, RoHS, REACH, etc.);

- contractual deliverables and milestones (including CE declaration, checks on the compliance of factory-manufactured products, etc.);
- compliance with safety plans, prevention plans and authorizations for on-site installation and maintenance operations (site opening procedures with customers);
- supply of installation manuals setting out requirements, and maintenance manuals;
- level 1 and level 2 technical support, which may result in patches or upgrades to the solution;
- integration of any improvements made and adaptation of the manufacturing process.

##### In relation to users:

- compliance with the user pathway (document formally setting out the customer's requirements for the development of its solution);
- operational safety (in-house electrical and mechanical safety testing);
- signage integrated into products (use and prevention labels for end users and maintenance workers, nameplate with CE marking, UL certification for electronic products, etc.);
- ensuring that maintenance areas are safe (signs and markings, etc.);
- flexibility of the solutions and backwards compatibility of components.

The Group's whistleblowing system may also be used by third parties, enabling any interested party to submit a report or complaint concerning risks of serious human rights or health and safety violations.

### 3.3.3.2. CONSUMER AND END USER ENGAGEMENT PROCESS ON SAFETY ISSUES (S4-2)

Discussions with customers and end users on health and safety issues take place at various levels.

#### BLUE

At Blue, a comprehensive validation plan covering all aspects of health and safety management is deployed with customers. A customer service department and BtoB platforms (a Blue Solutions platform and a Bluebus platform) may also be used to report safety alerts concerning faulty or destroyed batteries or batteries that have reached the end of their life. A team is also responsible for end-of-life battery management: collecting batteries for repair or recycling, in compliance with safety criteria. Customer-

related and production quality defects are monitored in-house as part of a dedicated QRQC (quick response quality control) feedback system, which allows information to be more comprehensively traced (sharing and back-up). Daily meetings are held to analyze customer feedback and any quality issues encountered by the factories.

#### SYSTEMS

The IER and AS's solutions meet customers' specifications to the extent that they are clearly specified, particularly as part of invitations to tender, and in all cases comply with the standards and regulations applicable to our markets and their environments. There is no formal engagement process between Société Industrielle Financière de l'Artois and its consumers and end users beyond the

maintenance services provided to all customers. As Société Industrielle Financière de l'Artois sells its products on a BtoB basis, the engagement processes are carried out with the customer. Within this framework, alerts concerning the safety of consumers and end users may still be raised.

### 3.3.3.3. DESCRIPTION OF CHANNELS THAT MAY BE USED BY CONSUMERS AND END USERS TO RAISE CONCERNS (S4-3)

#### BLUE

The customer service system and the BtoB platform can be used to report product safety alerts. A specific security and handling protocol (quarantine of vehicles and batteries) is then implemented by the customer quality team. Bluebus also has an after-sales service team, which compiles statistics based on customer feedback and categorizes the nature of the problems reported. This after-sales service disseminates satisfaction surveys to the entire network of customers and authorized repairers, covering order conformity, the quality of parts, the sales service, the responsiveness of the teams, etc., and processes the surveys. Two types of survey were carried out in 2024. Questionnaires for customers and repairers, and 22 annual control audits for repairers, including on health and safety aspects. 38 repairers were assessed on various criteria (responsiveness, quality, cost, etc.).

Using the BtoB platform, the after-sales service department compiles statistics based on customer feedback, categorizing the nature of problems reported following incidents – an average of 67 per month, categorized into 13 categories (chargers, batteries, heating, equipment, steering, braking, cooling, etc.).

#### Indicators

The number of broken-down vehicles is compared to the number of vehicles in operation, and this rate is monitored and assessed in order to achieve an availability rate of above 90%. In 2024, the average availability rate was 92.1% for 6-meters buses and 94.3% for 12-meters buses. The respective figures for 2023 were 91.5% and 94.2%, demonstrating an upward trend.

#### SYSTEMS

When selling its solutions, the IER group offers its customers support services (on-site or remote interventions by its teams) and maintenance services. When they deliver equipment, IER and AS provide deployment services from installation to commissioning, configuration and the setting of parameters in the customer's specific environment (including acceptance testing). During the life cycle of the equipment, the IER group provides support and maintenance services on a 24/7 basis:

- level 1 support: answering calls, diagnosis, remote resolution or escalation to higher levels of expertise;
- level 2 support: complex analysis, administration of installed databases and customer sites, training, technical documentation;
- on-site maintenance: remedial or preventive;
- repairs in workshops and spare parts management.

The services are coordinated by a Deployment, Service and Customer Service Project Manager during all phases of the installation or maintenance services. The whistleblowing system can also be used by anyone to report to the Bolloré Group a crime or an offense, a breach of the law or regulations, a threat to the general interest, or a failure to follow the Bolloré Group's Code of Conduct resulting from the activities of Group companies or of their subcontractors or suppliers. This system, which can be accessed from the Bolloré Group's website and at [alert.bolloré.com](mailto:alert.bolloré.com), enables individuals to report actions that go against its anticorruption policy or that violate human rights. The use of the whistleblowing system requires the identification of the whistleblower, unless the report provides sufficient details to establish the severity of the facts. Reports are processed by specially authorized persons covered by an obligation of confidentiality. The Group protects whistleblowers who act in good faith from any form of reprisal.

### 3.3.3.4. DESCRIPTION OF HEALTH AND SAFETY INITIATIVES IMPLEMENTED FOR CONSUMERS AND END USERS (S4-4)

In addition to the existing customer alert systems used by the Blue and Systems businesses (BtoB platform, maintenance service and after-sales service), the whistleblowing procedure describes the steps that will be taken by the Group in the event of a verified whistleblowing alert. If a whistleblowing alert is accepted, it is investigated with a view to establishing whether the facts are material and what action, if any, needs to be taken (disciplinary proceedings, or appropriate remediation, preventive or mitigation measures).

#### BLUE

Blue's subsidiaries implement health and safety policies specific to their industrial activities. They are implemented through improvement programs presented and validated by the employee representative bodies each year. These policies constitute risk prevention measures and are implemented as early as the battery design phase. Upstream FMECA (Failure mode, effects, and criticality analysis) is carried out as part of the safety management process and serves to identify any tests that need to be carried out during the design phase. Verification tests are carried out on battery components, and electrical and thermomechanical simulation tools are used to check for and correct any vulnerabilities. The safety of battery modules and packs is verified through environmental tests (thermal variation, vibrations and shocks, falls, and electromagnetic compatibility). Battery packs are finally validated on integration tables, which reproduce the complete system of application in a laboratory setting (calculator, accessories, chargers, electrical connection boxes, etc.).

Blue Solutions' battery production sites are also certified to the IATF 16949:2016, reinforcing aspects linked to safety, traceability and the technical specifications required for automotive production. Finally, Blue activities are certified as meeting 9001:2015 quality standards and comply with around thirty regulations involving user safety. Blue Solutions is also ECE R100 certified (regulation on the approval of vehicle batteries) and ECE R10 certified (regulation on the approval of vehicles and their electrical and electronic sub-assemblies with regard to electromagnetic compatibility) and also requires its strategic suppliers to have obtained quality-related certifications. Blue's battery modules and packs also comply with the transportation requirements of section 38.3 of the United Nations "Manual of Tests and Criteria" on the transport of dangerous goods.

- Downstream, at the production level, a monitoring plan is drawn up for each stage: checks on the electrical voltage at the cell and assembly levels, cameras on the films and assembly, and checks on the sealing of modules. 100% of our spare parts are inspected before being shipped. Additional safety tests are also carried out on health and safety risks in the event of fire.
- Bluebus has incorporated a protective measure around the battery packs integrated into the buses (which triggers an evacuation alarm in the event that the battery packs become excessively hot).
- Further studies were carried out following the two fires that broke out on RATP buses in Spring 2022. Investigations were carried out in order to determine the source of the fault and to limit the consequences of any future events. Modifications were made to the buses (addition of a fuse, a protective measure and Stamax™ – a material that slows the spread of flames around battery packs). Full-scale tests were carried out in late December 2024 and in mid-January 2025. Blue's teams include a specialist in functional and dysfunctional battery testing.

The human resources allocated to the implementation of these measures come from subsidiaries' technical teams and QHSE teams, who ensure that these measures are properly implemented and comply with the requirements set out in quality and IATF standards, which constitute the most stringent applicable standards.

Blue Solutions also works closely with relevant identified stakeholders to manage any health and safety risks that could impact third parties. Every year, discussions, meetings and crisis exercises are organized in conjunction with the public authorities and fire departments, with a view to providing training and raising awareness of the specific dangers and risks associated with lithium batteries.

#### SYSTEMS

IER and AS closely monitor regulatory standards on product safety (radiofrequency/EMC – electromagnetic compatibility, electrical safety, RoHS, REACH, etc.) to ensure that products certified at any given time comply with applicable standards. The IER group's products must comply with the numerous directives listed below. Compliance with each directive is achieved by meeting the corresponding standards.

- **Machinery safety directive 2006/42/EC:**
  - compliance with EN 12100: safety of machinery – general principles for design;
  - compliance with EN 60950: risk assessment and risk reduction;
  - compliance with minimum safety clearances;
  - compliance with impact forces;
  - compliance with EN 60204-1: safety of machinery, electrical equipment of machines – part 1: general requirements.
- **Low voltage directive 2014/35/EU:**
  - compliance with EN 62368-1: audio/video, information and communication technology equipment – part 1: safety requirements;
  - dielectric testing, brief power cuts, etc.

- **Electromagnetic compatibility directive 2014/30/EU:**
    - compliance with EN 61000-6-4 (2007 + A1/2011): electromagnetic compatibility (EMC) – part 6-4: generic standards – emission standard for industrial environments.
  - **RED directive 2014/53/EU (connectivity):**
    - compliance with EN 300 330 v2.1.1 (limited program): short-range devices (SRD) – radio equipment in the frequency range 9 kHz to 25 MHz.
  - **RoHS directive 2011/65/EU:**
    - restriction of the use of hazardous substances commonly used in electrical and electronic equipment (EEE);
    - verification of suppliers' RoHS certificates.
- AS products also undergo endurance and safety testing prior to CE marking (European conformity) of the products.
- It should also be noted that a FMECA (Failure mode, effects, and criticality analysis) is carried out for IER's products.

#### 3.3.3.5. REPUTATIONAL AND FINANCIAL RISKS

Negative impacts on the safety of consumers and end users also give rise to reputational risks, since a serious safety issue for a user of Blue and Systems' products could result in media controversy that could severely damage the company's image.

A financial risk has also been identified for Blue Solutions. The marketing of a defective product that may be unsafe for consumers and end users may result in a loss of customers and hinder business development.

As these risks are derived from the identified negative impacts, they are addressed through the same policies and action plans.

#### 3.3.3.6. DESCRIPTION OF TARGETS ASSOCIATED WITH CONSUMER AND END USER SAFETY (S4-5/MDR-T)

As manufacturers, Blue and Systems are fully committed to complying with applicable regulations that impose strict standards on the health and safety of users, and rigorously comply with these requirements to ensure that their products are safe.

Nevertheless, in view of their limited potential level of liability, Blue and Systems do not have, and have not planned to introduce, specific targets concerning the safety of consumers and end users.

## 4. Governance information – Sharing the same business ethics and ensuring compliance with the strictest standards

### 4.1. Implementing business ethics and compliance (ESRS G1)

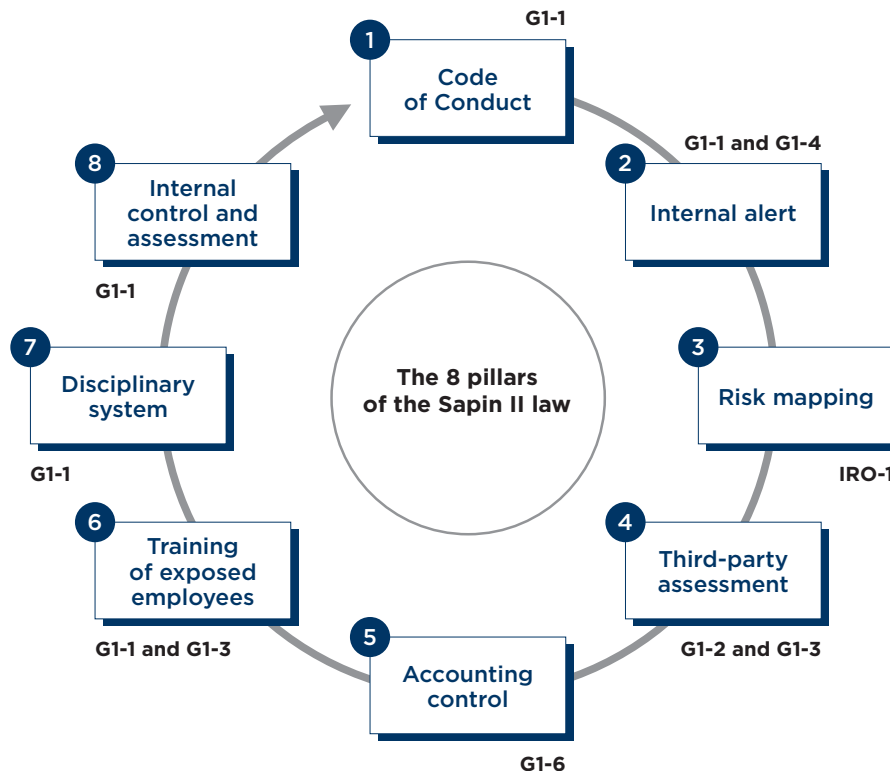
Specific material issue	Impact/risk/opportunity	Description	Scope concerned
<b>Ethics and compliance</b>	Negative impact	Risk of suppliers/business partners being insolvent as a result of corruption, risk that employees hired by suppliers/business partners lose their jobs	Entire scope
	Legal risk	Fines for bribing public officials (Sapin II) of up to 30% of the company's revenue	Entire scope
	Reputational risk	Major media controversies that may damage the company's image. The investigations carried out by the AFA (French Anticorruption Agency) are made public, as are any sanctions imposed in the event that the Group's employees breach anticorruption rules	Entire scope

The Bolloré Group has been committed since its creation to an ethical approach based on commitments shared across all its subsidiaries. A signatory of the United Nations Global Compact since 2003, the Group has undertaken to support the fundamental principles of the Global Compact relating to human rights, working standards, the environment and the fight against corruption by including the ten principles of the Global Compact into its strategy, culture and day-to-day operations, and also clearly informing its employees, partners, customers and the public of its commitment. The Bolloré Group condemns corruption, influence peddling and anticompetitive practices. It ensures financial transparency, compliance with economic sanctions programs and the protection of personal data. It avoids attacks on the environment, human rights and the fundamental freedoms, health

and safety of people. Lastly, it fights against all forms of discrimination and harassment.

The Bolloré Group's Code of Conduct reiterates these commitments and details the behavior expected of any person acting on its behalf. Because individual actions must not compromise the collective commitment, it is the responsibility of each of the employees, agents and business partners of all Group companies to join it. The Bolloré Group does not tolerate any breach of its Code and encourages its stakeholders to report any action that would be contrary to it. The perpetrators of prohibited behavior are subject to disciplinary sanctions or legal proceedings in accordance with applicable law. In addition, the Bolloré Group states that it does not have specific targets in 2025 concerning its internal governance issues.

#### The links between the Sapin II law and ESRS G1



## 4.2. The role of the administrative, management and supervisory bodies in business ethics (GOV-1)

The following information supplements the description of the Bolloré Group's corporate governance structure in chapter 1, which sets out the General Principles relating to the ESRS 1 and ESRS 2 cross-functional standards, and the information in chapter 4 of the Group's universal registration document, entitled "Corporate governance", on page 163.

The Bolloré Group's Compliance Department and the compliance officers at the Group's legal entities ensure that a program based on the best standards in this area, including the recommendations of the AFA (French Anticorruption Agency) and the main regulatory authorities in these sectors, is effectively implemented, covering three areas of compliance: prevention of corruption and influence peddling, prevention of anticompetitive practices, and compliance with export controls and economic sanctions programs.

Compliance with the Bolloré Group's commitments is based on an effective and consistent system, common to all activities, implemented in particular by an organization responsible for ensuring its application:

- **the Board of Directors' Audit Committee and the Risk Committee** monitor the effectiveness of internal control and risk management systems, including the compliance program;
- **Executive management** sets the Group's targets and overall strategies, ensuring that all staff are informed of them;
- **the Ethics – CSR and Anticorruption Committee** defines and coordinates the implementation of the CSR approach in the Group and, as such, closely monitors the implementation and effectiveness of the Group's compliance system;
- **the Group Chief Compliance Officer** is responsible for implementing the compliance program, reports on the effectiveness of program to the Group's Audit Committee and the Ethics – CSR and Anticorruption Committee, and to the Group and division Chairmen and Chief Executive Officers. The Compliance Department, created in 2008, oversees the effective implementation of the compliance program in all Group subsidiaries. Its staff of 10 includes managers, analysts, assistants and work-study students. To carry out its mission, it works in close collaboration with all operational and support functions (human resources and purchasing in particular) and relies on a network of compliance officers at all levels of the organization.

**The Bolloré Group's compliance program** is committed to satisfying all its stakeholders' expectations concerning business ethics, especially the prevention of corruption and influence peddling, the prevention of anticompetitive practices, and compliance with international sanctions.

To prevent, detect and deter breaches of its commitments, the Bolloré Group has deployed a compliance program inspired by the highest international standards, such as the guidelines of the AFA, the US FCPA, the US OFAC and the UK Serious Fraud Office. This program is founded on the following pillars:

- **tackling corruption and influence peddling:** the Bolloré Group condemns all forms of corruption and influence peddling. As set out in the Code of Conduct, persons acting on behalf of the Bolloré Group must refrain from offering any benefit whatsoever to any person (in particular public officials) to persuade them to perform or refrain from performing an official function, or to persuade them to exercise their influence with a view to obtaining an undue decision for the benefit of a Group company. The French Sapin II law of December 9, 2016 requires French companies with at least 500 employees and with revenue or consolidated revenue in excess of 100 million euros to take measures to prevent and detect corruption and influence-peddling. As such, the Group has implemented a compliance program inspired by the highest international standards in business ethics, and ensures that it is integrated into the operational and organizational processes of all Group subsidiaries, supported by a network of compliance officers at all levels of the organization. This risk has not been identified as one of the priority risks of the Communications sector, given the nature of its activities;

- **international export controls and sanctions:** the Bolloré Group complies with all sanctions, including those issued by the United Nations Security Council, the European Union and the United States of America, whether they be restrictive measures against a State, an individual or an organization. As set out in the Code of Conduct, all persons acting on behalf of the Group must refrain from participating in transactions that could violate an embargo, sector-specific sanctions or asset freezes. The Bolloré Group must observe the international, community and national regulations on export controls and economic sanctions that apply to the Group's business lines. Such regulations are enacted and updated actively by political entities at different levels: international organizations such as the UN, political and economic unions such as the European Union for their Member States, the countries themselves such as France and the United States of America. The objective of export controls is to prevent goods from being diverted from peaceful civilian use, to control war materials and, for some States, to control strategic exports. Economic and financial sanctions are an instrument of foreign policy of States and groups of States. They are intended to prohibit, restrict, or impose trade in targeted goods, technologies and services and may include measures for persons or entities related to States or groups of States. This includes territories, and natural or legal persons likely to represent a danger, and goods, equipment, or products classified as "at risk";
- **compliance with competition provisions:** a healthy competitive environment conducive to innovation allows the Bolloré Group to offer the best products and services to its customers. The Bolloré Group does not engage in any practice aimed at unfairly distorting, hindering, suppressing or restricting free competition. Such practices include price fixing and dividing up market share and invitations to tender. Companies in the Bolloré Group must comply, wherever they operate, with the rules of competition law laid down by States, the European Union and all international organizations. The rules prohibit, among other things, understandings, agreements, projects, formal and informal arrangements, or coordinated behavior between competitors whose purpose is to set their prices, the distribution of their territories, market shares or their customers;
- **senior management's commitment:** at the highest level, the Group's senior management promotes a culture of integrity, transparency and compliance. This commitment is reflected in the Group's Code of Conduct. It relies on a zero-tolerance policy for the risk of corruption, the inclusion of anticorruption requirements in procedures and policies, validation of the risk mapping, governance of the anticorruption prevention, detection and remediation program, and the implementation of a specific communications policy. The same applies to the fight against anticompetitive practices, compliance with international sanctions and export controls in terms of approval of arrangements, codes of conduct, integration in procedures and policies, program governance and the implementation of a specific communication policy. The managing body's commitment to the fight against corruption has also been expressed, every year since 2018, on International Anticorruption Day (December 9). On that day, the managers of the Group and its subsidiaries reiterate the Bolloré Group's determination to root out this scourge. In 2024, the governing body was represented by Fabricio Protti, Deputy Chief Executive Officer of the Bolloré Group. This awareness-raising campaign, aimed at reminding employees of the challenges associated with tackling corruption and of the Group's anticorruption program, also involved internal and external stakeholders, and brought together over 350 employees from business lines identified as being at risk.



### 4.3. Description of the process used in mapping risks to business ethics (IRO-1)

The mapping of corruption and influence peddling risks aims to identify, assess, prioritize and manage the inherent risks of corruption and influence peddling, taking into account the specific characteristics and diversity of our organizations in terms of business sectors, business lines or the geographical areas in which the activities of the Bolloré Group's different divisions operate.

In response to the Bolloré Group's diverse range of business activities and the organizational changes made to the Group, the mapping of corruption and influence peddling risks was updated in 2024, based on a new methodology, also published in 2024.

The major change made to the methodology was the creation of a corruption and influence peddling risk map for each division, and then for each local entity within the division. A central corruption risk map is then produced by aggregating the various divisional maps and the Group-level maps, in accordance with current regulatory requirements.

To date, four divisional mapping exercises have been carried out (Bolloré Energy, Blue, Innovative Thin Films, Blue Systems), 15 local mapping exercises have been carried out (including two Group-level exercises, including Bolloré SE), and three exemptions have been exercised (as a result of there being no risk). By the end of 2024, 9 additional maps will have been produced, including those for Automatic Systems.

### 4.4. Corporate culture and business conduct policies (G1-1)

The management's commitment set out in the introductory chapter to the Code of Conduct and demonstrated through the events held on December 9 each year serve to promote the company's corporate culture.

At the highest level, the Group's senior management promotes a culture of integrity, transparency and compliance. This commitment is reflected in the Group's Code of Conduct. It relies on a zero-tolerance policy for the risk of corruption, the inclusion of anticorruption requirements in procedures and policies, validation of the risk mapping, governance of the anticorruption prevention, detection and remediation program, and the implementation of a specific communications policy. The same applies to the fight against

anticompetitive practices, compliance with international sanctions and export controls in terms of approval of arrangements, codes of conduct, integration in procedures and policies, program governance and the implementation of a specific communication policy. The governing body's commitment to tackling corruption. In 2024, the governing body was represented by Fabricio Protti, Deputy Chief Executive Officer of the Bolloré Group. This awareness-raising campaign, aimed at reminding employees of the challenges associated with tackling corruption and of the Group's anticorruption program, also involved internal and external stakeholders, and brought together over 350 employees from business lines identified as being at risk.

#### 4.4.1. PREVENTION

**Code of Conduct (G1-1):** the Bolloré Group's ethical approach is based on values and principles embodied each day by all its executives and employees worldwide. The Group's Code of Conduct was revised at the end of 2024 based on the AFA's recommendations and findings following the Group's deferred prosecution agreement (convention judiciaire d'intérêt public or CJIP) (2021/2023).

It describes, for all employees and partners (suppliers, service providers and external workers), the behavior expected when dealing with high-risk situations, and reiterates the Group's zero-tolerance policy towards corruption, as well as its rejection of anticompetitive practices and its commitment to comply with all international sanctions programs. The Bolloré Group's Code of Conduct applies to all persons acting on its behalf. It is incorporated into the internal regulations of all Group subsidiaries. It can also be found on the Group's website and, as an integral part of the Bolloré Group's requirements, is provided to all its partners. The Bolloré Group does not tolerate any breach of its Code of Conduct and any person who breaches it may be subject to disciplinary sanctions and legal proceedings in accordance with applicable laws.

The Bolloré Group applies a number of Charters that are signed and recognized by its governing bodies, including the Ethics and CSR Charter and the Responsible Purchasing Charter. This documentary corpus forms the basis of its governance system and is approved by the Ethics – CSR and Anticorruption Committee, and signed by the Group's Chairman.

The provisions of the Code of Conduct and the Ethics and CSR Charter apply to the Bolloré Group, to all its subsidiaries that are majority-owned within the meaning of French law, and to their employees. The Code of Conduct and the Ethics and CSR Charter are given to each employee when they join the Group. A compulsory e-learning course is provided to employees every two years to remind them of the principles and the associated documentation.

In addition, the Group Purchasing Department is responsible for distributing this information to suppliers. In 2024, 98% of suppliers had signed the Group's Code of Conduct. In the event that they refuse to sign it, a Mutual Recognition Agreement (MRA) is signed by the Group and the supplier in which they jointly commit to the fundamental principles.

**Awareness-raising and training (G1-1 & G1-3):** the Bolloré Group deploys a training system to ensure that all its employees have a good understanding of its Code of Conduct, in particular its zero-tolerance policy on corruption, its rejection of anticompetitive practices and its commitment to comply with all international sanctions programs.

In addition, employees in business lines identified as being at risk are subject to additional training through e-learning sessions on specific risks (gifts, bribery) and procedures aimed at preventing them.

This mandatory training path must be completed by all new employees and repeated every two years. The completion of these training courses is reviewed during annual appraisals.

To ensure that our training courses are appropriate and relevant, the modules are tailored to the various categories of employee based on their level of exposure to risk. This classification has been defined in conjunction with the Human Resources Department, which identified "target groups" based on the *B'People* HR directory, which lists all staff. Depending on their role and responsibilities, employees may be required to take one or more specific training modules. By way of example, a salesperson will be assessed on training courses covering gifts and invitations, facilitation payments or sponsorship, while a Chief Executive Officer will be required to complete all the available modules.

**Third-party assessment (G1-2 & G1-3):** the Bolloré Group ensures that its intermediaries, suppliers, subcontractors and customers adhere to the same business ethics.

Specific procedures for each activity, developed using a risk-based approach and a mapping of the types of third parties involved, are designed to ensure their integrity, and to verify and secure all business relationships upstream, within the normative framework of the AFA's recommendations. The teams who carry out this work ensure all third parties strictly comply with the values set out in the Bolloré Group's Code of Conduct and adhere to the regulations in force. The Group's objective is to instill in the DNA of its exposed managerial and operational teams the absolute necessity of adopting and adhering to the anticorruption due diligence rules, an essential protective shield for the reputation and respectability of the Bolloré Group. To this end, the dedicated procedures established for intermediaries and suppliers include a questionnaire and the collection of documents that will enable the required due diligence work to be carried out.

This consists of assessing a company's legal, social, shareholder and professional standing – in short, its reputation – and its strict compliance with national and international laws and regulations on anticorruption. Business relationships may not be entered into without the Compliance Department's approval (see chapter 2 – Bolloré Group duty of care plan).

#### 4.4.2. DETECTION

In 2018, the Compliance Department, the Human Resources Department and the CSR Department collaborated on revising the existing whistleblowing system to address, 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 French Anticorruption Agency (AFA) and the Commission nationale de l'informatique et des libertés ("Cnil", the French data protection authority). This alert system has been the subject of consultations with the employee representative bodies to adapt to the Cnil reference standard relating to the processing of personal data intended for the implementation of a professional whistleblowing alerts system. Its deployment and the processes for collecting and handling alerts are explained in the alert procedure, described below:

**The whistleblowing system (G1-1 & G1-4):** a mechanism that enables the Group's stakeholders employees (including its partners, suppliers, subcontractors and employees) to alert it of a crime or an offense, a breach of the law or regulations, a threat to the general interest, or a failure to follow the Bolloré Group's Code of Conduct resulting from the activities of Group companies or of their subcontractors or suppliers.

As such, the Group's alert and reporting platform can be used for alerts relating to violations or risks of violations of human rights, fundamental freedoms, personal health and safety or the environment.

This notification can be made via a dedicated platform, accessible from the Group's website, and at alert.bolloré.com.

In order to process alerts, the whistleblower needs to be identified, unless the report provides sufficient details to establish the severity of the facts.

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. Whistleblowers' alerts are processed at the head office level and supervised by the Chairman of the Ethics – CSR and Anticorruption Committee, who carries out their duties in a fully independent manner. Reports are processed by specially authorized persons subject to a duty of confidentiality, who have the necessary expertise, authority and resources, and are specially trained on carrying out this role. These employees are selected jointly by the local Executive management team, the Group Human Resources Department and the Compliance Department. Depending on the nature of the alert, other stakeholders, such as the Finance Department, may become involved.

The team in charge of investigating the alert is therefore established based on the nature of the alert and the people involved, thereby ensuring that alerts are handled in an appropriate and impartial manner. Depending on the sensitivity of the facts reported, and in order to ensure that the whistleblower's identity remains confidential, investigations may be carried out either internally by qualified staff, or externally by specialized agencies such as Forensic. Specific training on carrying out internal investigations by compliance officers was provided on September 24 and 25, 2024, with the involvement of the French Anticorruption Agency's department that provides

support to economic operators. Further details on the training courses are provided below.

The Bolloré Group does not tolerate any breach of its Code of Conduct and any person who breaches it may be subject to disciplinary sanctions and legal proceedings in accordance with applicable laws.

By way of reminder, this whistleblowing system does not replace the external reporting procedures provided for by law (in particular those provided for in II of article 8 of the law of December 9, 2016<sup>(1)</sup>).

**Protection of whistleblowers (G1-1 & G1-4):** the Group protects whistleblowers who act in good faith from any form of reprisal. This protection is in line with the provisions of law no. 2022-401 of March 21, 2022 on the protection of whistleblowers, which are incorporated into the internal regulations of Group companies in accordance with the timetable for consulting employee representative bodies, with the effect that employees who breach these regulations are subject to disciplinary sanctions.

Anyone who feels they have been the victim of reprisals can submit their case to external whistleblowing organizations, and are legally exempt from civil and criminal liability, notwithstanding the civil and criminal fines imposed on those persons guilty of violating the rights of whistleblowers. In 2024, neither the Bolloré Group nor the persons authorized to handle alerts were contacted by persons who considered themselves to be victims of reprisals or by organizations and/or jurisdictions acting on their behalf.

**Anticorruption accounting controls and financial controls (G1-6):** identified using the corruption risk map, specific anticorruption controls are in place at different levels of the organization. With respect to sanctions, financial controls are carried out on our transactions to ensure compliance with sanctions.

**The system's internal control and evaluation mechanism (G1-1):** a three-level control system is applied to ensure the effectiveness of the anticorruption compliance program, which is subject to specific controls by the Group's Internal Audit Department.

For its Level 1 Controls (CN1) and level 2 controls (CN2), the Compliance Department is working on introducing the following tools: a sampling methodology, a monitoring matrix and a RACI matrix. This entire program is being rolled out in 2025, in line with the AFA's recommendations (recommendations 64, 65 and 66).

By way of example, controls on the dissemination and implementation of the Code of Conduct will be carried out at two levels:

- CN1: the first level of controls will check that the employee representative bodies are consulted before the Code of Conduct is updated and that it is appended to the internal regulations (or any other document establishing the disciplinary system);
- CN2: implementation of a "detective" control system overseen by central management. This system provides for quarterly checks, based on a sample of seven Group companies, to ensure that the employee representative bodies have been consulted, that the minutes of these consultations have been published, and that the updated Code of Conduct has been disseminated.

Finally, a level 3 control known as an "internal audit" will be carried out, covering the implementation of the level 1 controls at a local level and the level 2 controls at a central management level. The Internal Audit Department will also check that the most recent minutes of the consultations of the employee representative bodies concerning the Code of Conduct (social and economic committee and trade unions) have been obtained.

#### 4.4.3. REMEDIATION

**Definition of corrective measures and disciplinary regime (G1-1):** the updating of the mapping and the detection system through program controls and internal system assessments give rise to specific action plans ensuring the necessary remediation. In disciplinary terms, the perpetrators of prohibited behavior are subject to disciplinary sanctions or legal proceedings in accordance with applicable law.

(1) List appended to Decree no. 2022-1284 of October 3, 2022 on procedures for collecting and processing alerts.

## 4.5. Prevention and detection of corruption and bribery (G1-3)

The Bolloré Group deploys a training system to ensure that all its employees have a good understanding of its Code of Conduct, in particular its zero-tolerance policy on corruption, its rejection of anticompetitive practices and its commitment to comply with all international sanctions programs. All members of the Governance bodies, including corporate officers, follow the same generic training on the Code of Conduct as all other employees. In addition, employees in business lines identified as being at risk are subject to additional training through e-learning sessions on specific risks (gifts and invitations, international sanctions and export controls) and procedures aimed at preventing them.

By way of example, as a result of their roles, all members of the Governance network are required to take all the e-learning modules, regardless of which business, sector or department (industrial, agricultural, distribution, etc.) they work in. Their hierarchical position means that they are required to complete all Compliance training modules. This mandatory training path must be completed by all new employees and repeated every two years by all employees. The completion of these training courses is reviewed during annual appraisal meetings, and failure to carry out the training may result in disciplinary action.

### Example of a KPI table

Name of the training course	Length (minutes)	Format	Target population	Registrations	Total completions	Total training hours
Bolloré Group Code of Conduct	25	e-learning	All employees	200	164	68
Anti-corruption: gifts and invitations	20	e-learning	Exposed population	74	74	24
International sanctions and export controls	20	e-learning	Exposed population	26	26	8
<b>TOTAL</b>				<b>300</b>	<b>264</b>	<b>100</b>

The report is presented to the Group's governing bodies twice a year at the Ethics – CSR and Anticorruption Committee, attended by the Group's Chairman, the Chairman of the Ethics – CSR and Anticorruption Committee, Executive management and the members of the Executive Committee. The anticorruption program is freely available to all third parties and employees, as it is included in the Bolloré Group's universal registration document.

There are also quarterly meetings of the Compliance Committee attended by the main Divisions (Blue Solution, Systems and Bolloré Energy) to review the results of the various applicable KPIs. The Compliance Department also attends meetings of the Group Audit Committee, the Risk Committee, monthly meetings of the Results Committees and meetings of the various Bolloré SE Comex.

### 4.5.1. OUTCOMES OF CORRUPTION INCIDENTS IN 2024 (G1-4)

The Bolloré Group recorded no corruption incidents in 2024.

## 5. Appendices

### 5.1. List of datapoints in cross-cutting and topical standards required under other European Union legislations

Disclosure requirement and related datapoint	SFDR reference <sup>(1)</sup>	Pillar 3 reference <sup>(2)</sup>	Benchmark Regulation reference <sup>(3)</sup>	European Climate Law <sup>(4)</sup>	Location in URD
ESRS 2 GOV-1 Board's gender diversity, paragraph 21(d)	Indicator number 13, table #1 of annex I		Commission Delegated Regulation (EU) 2020/1816 <sup>(5)</sup> , annex II		Chapter 4, section entitled "Administrative and management bodies"
ESRS 2 GOV-1 Percentage of board members who are independent, paragraph 21(e)			Commission Delegated Regulation (EU) 2020/1816, annex II		Chapter 4, section entitled "Administrative and management bodies"
ESRS 2 GOV-4 Statement on due diligence, paragraph 30	Indicator number 10, table #3 of annex I				Chapter 2, part entitled "General principles", section 1.2.3. – Due diligence statement
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities, paragraph 40(d) i	Indicator number 4, table #1 of annex I	Article 449a of Regulation (EU) 575/2013; Commission Implementing Regulation (EU) 2022/2453 <sup>(6)</sup> , table 1: Qualitative information on environmental risk and table 2: Qualitative information on social risk	Commission Delegated Regulation (EU) 2020/1816, annex II		Chapter 2, part entitled "General principles", section 1.3.11. – Presentation of material IROs and their interaction with strategy and business model
ESRS 2 SBM-1 Involvement in activities related to chemical production, paragraph 40(d) ii	Indicator number 9, table #2 of annex I		Commission Delegated Regulation (EU) 2020/1816, annex II		Not applicable
ESRS 2 SBM-1 Involvement in activities related to controversial weapons, paragraph 40(d) iii	Indicator number 14, table #1 of annex I		Delegated Regulation (EU) 2020/1818 <sup>(7)</sup> , article 12.1, annex II		Not applicable

Disclosure requirement and related datapoint	SFDR reference <sup>(1)</sup>	Pillar 3 reference <sup>(2)</sup>	Benchmark Regulation reference <sup>(3)</sup>	European Climate Law <sup>(4)</sup>	Location in URD
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco, paragraph 40(d) iv			Delegated Regulation (EU) 2020/1818, Article 12(1), annex II		Not applicable
ESRS E1-1 Transition plan to reach climate neutrality by 2050, paragraph 14				Regulation (EU) 2021/119, Article 2(1)	Chapter 2, Environment part entitled "Innovating in response to major environmental challenges", section 2.2.3.1. – 2024 analysis of physical and transitional climate-related risk
ESRS E1-1 Undertakings excluded from Paris-aligned benchmarks, paragraph 16(g)		Article 449a Regulation (EU) 575/2013; Commission Implementing Regulation (EU) 2022/2453, template 1: Banking book – Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, article 12.1(d) to (g), and article 12.2		Chapter 2, Environment part entitled "Innovating in response to major environmental challenges", section 2.2.4. – Group climate change decarbonization plan
ESRS E1-4 GHG emission reduction targets, paragraph 34	Indicator number 4, table #2 of annex I	Article 449a Regulation (EU) 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, article 6		Chapter 2, Environment part entitled "Innovating in response to major environmental challenges", section 2.2.4.1. – Climate change mitigation targets
ESRS E1-5 Energy consumption from fossil sources disaggregated by energy sources (only high climate impact sectors), paragraph 38	Indicator number 5, table #1, and indicator number 5, table #2 of annex I				Chapter 2, Environment part entitled "Innovating in response to major environmental challenges", section 2.2.4.4 – The Bolloré Group's carbon footprint
ESRS E1-5 Energy consumption and mix paragraph 37	Indicator number 5, table #1 of annex I				Chapter 2, Environment part entitled "Innovating in response to major environmental challenges", section 2.2.4.4. – The Bolloré Group's carbon footprint
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors, paragraphs 40 to 43	Indicator number 6, table #1 of annex I				Chapter 2, Environment part entitled "Innovating in response to major environmental challenges", section 2.2.4.4. – The Bolloré Group's carbon footprint
ESRS E1-6 Gross Scopes 1, 2, 3 and Total GHG emissions, paragraph 44	Indicators number 1 and number 2, table #1 of annex I	Article 449a Regulation (EU) 575/2013; Commission Implementing Regulation (EU) 2022/2453, template 1: Banking book – Climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, article 5.1, 6 and 8.1)		Chapter 2, Environment part entitled "Innovating in response to major environmental challenges", section 2.2.4.4.2. – GHG emissions
ESRS E1-6 Gross GHG emissions intensity, paragraphs 53 to 55	Indicator number 3, table #1 of annex I	Article 449a Regulation (EU) 575/2013; Commission Implementing Regulation (EU) 2022/2453, template 3: Banking book – Climate change transition risk: alignment indicators	Delegated Regulation (EU) 2020/1818, article 8.1		Chapter 2, Environment part entitled "Innovating in response to major environmental challenges", section 2.2.4.4.2. – GHG emissions

Disclosure requirement and related datapoint	SFDR reference <sup>(1)</sup>	Pillar 3 reference <sup>(2)</sup>	Benchmark Regulation reference <sup>(3)</sup>	European Climate Law <sup>(4)</sup>	Location in URD
ESRS E1-7 GHG removals and carbon credits, paragraph 56				Regulation (EU) 2021/1119, Article 2(1)	Chapter 2, Environment part entitled "Innovating in response to major environmental challenges", section 2.2.4.4.2. – GHG emissions
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks, paragraph 66			Delegated Regulation (EU) 2020/1818, annex II Delegated Regulation (EU) 2020/1816, annex II		Not published in 2024
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk, paragraph 66(a)		Article 449a Regulation (EU) 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraphs 46 and 47, template 5: Banking book – Climate change physical risk: Exposures subject to physical risk.			Not published in 2024
ESRS E1-9 Location of significant assets at material physical risk, paragraph 66(c)					
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes, paragraph 67(c)		Article 449a Regulation (EU) 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraph 34, template 2: Banking book – Climate change transition risk: Loans collateralized by immovable property – Energy efficiency of the collateral			Not published in 2024
ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities, paragraph 69			Commission Delegated Regulation (EU) 2020/1818, annex II		Not published in 2024
ESRS E2-4 Commission Delegated Regulation (EU) 2020/1818, annex II	Indicator number 8, table #1 of annex I; indicator number 2, table #2 of annex I; indicator number 1, table #2 of annex I; indicator number 3, table #2 of annex I				Not applicable
ESRS E3-1 Water and marine resources, paragraph 9	Indicator number 7, table #2 of annex I				Not applicable
ESRS E3-1 Dedicated policy, paragraph 13	Indicator number 8, table #2 of annex I				Not applicable
ESRS E3-1 Sustainable oceans and seas, paragraph 14	Indicator number 12, table #2 of annex I				Not applicable
ESRS E3-4 Total water recycled and reused, paragraph 28(c)	Indicator number 6.2, table #2 of annex I				Not applicable
ESRS E3-4 Total water consumption in m <sup>3</sup> per net revenue on own operations, paragraph 29	Indicator number 6.1, table #2 of annex I				Not applicable

Disclosure requirement and related datapoint	SFDR reference <sup>(1)</sup>	Pillar 3 reference <sup>(2)</sup>	Benchmark Regulation reference <sup>(3)</sup>	European Climate Law <sup>(4)</sup>	Location in URD
ESRS 2 – SBM 3 – E4 paragraph 16(a) i	Indicator number 7, table #1 of annex I				Not applicable
ESRS 2 – SBM 3 – E4 paragraph 16(b)	Indicator number 10, table #2 of annex I				Not applicable
ESRS 2 – SBM 3 – E4 paragraph 16(c)	Indicator number 14, table #2 of annex I				Not applicable
ESRS E4-2 Sustainable land/agriculture practices or policies, paragraph 24(b)	Indicator number 11, table #2 of annex I				Not applicable
ESRS E4-2 Sustainable oceans/seas practices or policies, paragraph 24(c)	Indicator number 12, table #2 of annex I				Not applicable
ESRS E4-2 Policies to address deforestation, paragraph 24(d)	Indicator number 15, table #2 of annex I				Not applicable
ESRS E5-5 Non-recycled waste, paragraph 37(d)	Indicator number 13, table #2 of annex I				Chapter 2, Environment part entitled "Innovating in response to major environmental challenges", section 2.4.3.3. – Resource outflows
ESRS E5-5 Hazardous waste and radioactive waste, paragraph 39	Indicator number 9, table #1 of annex I				Not applicable
ESRS 2 – SBM 3 – S1 Risk of incidents of forced labor, paragraph 14(f)	Indicator number 13, table #3 of annex I				Not applicable
ESRS 2 – SBM3 – S1 Risk of incidents of child labor, paragraph 14(g)	Indicator number 12, table #3 of annex I				Not applicable
ESRS S1-1 Human rights policy commitments, paragraph 20	Indicator number 9, table #3, and indicator number 11, table #1 of annex I				Not applicable
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labour Organization Conventions 1 to 8, paragraph 21			Commission Delegated Regulation (EU) 2020/1816, annex II		Not applicable
ESRS S1-1 Processes and measures for preventing trafficking in human beings, paragraph 22	Indicator number 11, table #3 of annex I				Not applicable
ESRS S1-1 Workplace accident prevention policy or management system, paragraph 23	Indicator number 1, table #3 of annex I				Chapter 2, Social part entitled "Promoting quality working conditions", section 3.1.8.1. – Health and safety policies



Disclosure requirement and related datapoint	SFDR reference <sup>(1)</sup>	Pillar 3 reference <sup>(2)</sup>	Benchmark Regulation reference <sup>(3)</sup>	European Climate Law <sup>(4)</sup>	Location in URD
ESRS S1-3 Grievance/complaints handling mechanisms, paragraph 32(c)	Indicator number 5, table #3 of annex I				Chapter 2, Social part entitled "Promoting quality working conditions", section 3.1.7. – Processes to remediate negative impacts and channels for own workforce to raise concerns (whistleblowing systems and remediation processes)
ESRS S1-14 Number of fatalities and number and rate of work-related accidents, paragraph 88(b) and (c)	Indicator number 2, table #3 of annex I		Commission Delegated Regulation (EU) 2020/1816, annex II		Chapter 2, Social part entitled "Promoting quality working conditions", section 3.1.9. – Metrics
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness, paragraph 88(e)	Indicator number 3, table #3 of annex I				Chapter 2, Social part entitled "Promoting quality working conditions", section 3.1.9. – Metrics
ESRS S1-16 Unadjusted gender pay gap, paragraph 97(a)	Indicator number 12, table #1 of annex I		Delegated Regulation (EU) 2020/1816, annex II		Chapter 2, Social part entitled "Promoting quality working conditions", section 3.1.9. – Metrics
ESRS S1-16 Excessive CEO pay ratio, paragraph 97(b)	Indicator number 8, table #3 of annex I				Chapter 2, Social part entitled "Promoting quality working conditions", section 3.1.9. – Metrics
ESRS S1-17 Incidents of discrimination, paragraph 103(a)	Indicator number 7, table #3 of annex I				Chapter 2, Social part entitled "Promoting quality working conditions", section 3.1.9. – Metrics
ESRS S1-17 Non-respect of UNGPs on business and human rights principles and OECD guidelines, paragraph 104(a)	Indicator number 10, table #1, and indicator number 14, table #3 of annex I		Delegated Regulation (EU) 2020/1816, annex II Delegated Regulation (EU) 2020/1818, article 12.1		Chapter 2, Social part entitled "Promoting quality working conditions", section 3.1.9. – Metrics
ESRS 2 – SBM3 – S2 Significant risk of child labor or forced labor in the value chain, paragraph 11(b)	Indicators number 12 and number 13, table #3 of annex I				Chapter 2, Social part entitled "Promoting quality working conditions", section 3.2.1. – Material IROs concerning workers in the value chain and interaction with strategy and business model
ESRS S2-1 Human rights policy commitments, paragraph 17	Indicator number 9, table #3, and indicator number 11, table #1 of annex I				Chapter 2, Social part entitled "Promoting quality working conditions", section 3.2.2. – Policies related to value chain workers
ESRS S2-1 Policies related to value chain workers, paragraph 18	Indicators number 11 and number 4, table #3 of annex I				Chapter 2, Social part entitled "Promoting quality working conditions", section 3.2.2. – Policies related to value chain workers
ESRS S2-1 Non-respect of UNGPs on business and human rights principles and OECD guidelines, paragraph 19	Indicator number 10, table #1 of annex I		Delegated Regulation (EU) 2020/1816, annex II Delegated Regulation (EU) 2020/1818, article 12.1		Chapter 2, Social part entitled "Promoting quality working conditions", section 3.2.2. – Policies related to value chain workers
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labour Organization Conventions 1 to 8, paragraph 19			Delegated Regulation (EU) 2020/1816, annex II		Chapter 2, Social part entitled "Promoting quality working conditions", section 3.2.2. – Policies related to value chain workers

Disclosure requirement and related datapoint	SFDR reference <sup>(1)</sup>	Pillar 3 reference <sup>(2)</sup>	Benchmark Regulation reference <sup>(3)</sup>	European Climate Law <sup>(4)</sup>	Location in URD
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain, paragraph 36	Indicator number 14, table #3 of annex I				Chapter 2, Social part entitled "Promoting quality working conditions", section 3.2.5. – Description of action plans implemented in favor of workers in the value chain
ESRS S3-1 Human rights policy commitments, paragraph 16	Indicator number 9, table #3 of annex I, and indicator number 11, table #1 of annex I				Not applicable
ESRS S3-1 Non-respect of UNGPs on business and human rights, ILO principles or and OECD guidelines, paragraph 17	Indicator number 10, table #1 of annex I		Delegated Regulation (EU) 2020/1816, annex II Delegated Regulation (EU) 2020/1818, article 12.1		Not applicable
ESRS S3-4 Human rights issues and incidents, paragraph 36	Indicator number 14, table #3 of annex I				Not applicable
ESRS S4-1 Policies related to consumers and end users, paragraph 16	Indicator number 9, table #3, and indicator number 11, table #1 of annex I				Chapter 2, Social part entitled "Promoting quality working conditions", section 3.3.2.1. – Policies on the data of consumers and end users and section 3.3.3.1. – Policies on the safety of consumers and end users
ESRS S4-1 Non-respect of UNGPs on business and human rights and OECD guidelines, paragraph 17	Indicator number 10, table #1 of annex I		Delegated Regulation (EU) 2020/1816, annex II Delegated Regulation (EU) 2020/1818, article 12.1		Chapter 2, Social part entitled "Promoting quality working conditions", section 3.3.2.1. – Policies on the data of consumers and end users and section 3.3.3.1. – Policies on the safety of consumers and end users
ESRS S4-4 Human rights issues and incidents, paragraph 35	Indicator number 14, table #3 of annex I				Chapter 2, Social part entitled "Promoting quality working conditions", section 3.3.2.4. – Description of initiatives implemented for consumers and end users and section 3.3.3.4. – Description of health and safety initiatives implemented for consumers and end users

Disclosure requirement and related datapoint	SFDR reference <sup>(1)</sup>	Pillar 3 reference <sup>(2)</sup>	Benchmark Regulation reference <sup>(3)</sup>	European Climate Law <sup>(4)</sup>	Location in URD
ESRS G1-1 United Nations Convention against corruption, paragraph 10(b)	Indicator number 15, table #3 of annex I				Chapter 2, Governance part entitled "Sharing the same business ethics and ensuring compliance with the strictest standards", section 4.4. – Corporate culture and business conduct policies
ESRS G1-1 Protection of whistle-blowers, paragraph 10(d)	Indicator number 6, table #3 of annex I				Chapter 2, Governance part entitled "Sharing the same business ethics and ensuring compliance with the strictest standards", section 4.4. – Corporate culture and business conduct policies
ESRS G1-4 Fines for violation of anticorruption and antibribery laws, paragraph 24(a)	Indicator number 17, table #3 of annex I		Delegated Regulation (EU) 2020/1816, annex II		Chapter 2, Governance part entitled "Sharing the same business ethics and ensuring compliance with the strictest standards", section 4.5.1. – Outcomes of corruption incidents in 2024
ESRS G1-4 Standards of anticorruption and antibribery, paragraph 24(b)	Indicator number 16, table #3 of annex I				Chapter 2, Governance part entitled "Sharing the same business ethics and ensuring compliance with the strictest standards", section 4.4.2. – Detection

(1) Regulation (EU) 2019/2088 of the European Parliament and of the Council of November 27, 2019 on sustainability-related disclosures in the financial services sector (OJ L 317, December 9, 2019, p. 1).

(2) Regulation (EU) 575/2013 of the European Parliament and of the Council of June 26, 2013 on prudential requirements for credit institutions and investment firms and amending Regulation (EU) 648/2012 (capital requirements regulation or "CRR") (OJ L 176, June 27, 2013, p. 1).

(3) Regulation (EU) 2016/1011 of the European Parliament and of the Council of June 8, 2016 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds and amending Directives 2008/48/EC and 2014/17/EU and Regulation (EU) 596/2014 (OJ L 171, June 29, 2016, p. 1).

(4) Regulation (EU) 2021/1119 of the European Parliament and of the Council of June 30, 2021 establishing the framework for achieving climate neutrality and amending Regulations (EC) 401/2009 and (EU) 2018/1999 (European Climate Law) (OJ L 243, July 9, 2021, p. 1).

(5) Commission Delegated Regulation (EU) 2020/1816 of July 17, 2020 supplementing Regulation (EU) 2016/1011 of the European Parliament and of the Council as regards the explanation in the benchmark statement of how environmental, social and governance factors are reflected in each benchmark provided and published (OJ L 406, December 3, 2020, p. 1).

(6) Commission Implementing Regulation (EU) 2022/2453 of November 30, 2022 amending the implementing technical standards laid down in Implementing Regulation (EU) 2021/637 as regards the disclosure of environmental, social and governance risks (OJ L 324, December 19, 2022, p. 1).

(7) Commission Delegated Regulation (EU) 2020/1818 of July 17, 2020 supplementing Regulation (EU) 2016/1011 of the European Parliament and of the Council as regards minimum standards for EU Climate Transition benchmarks and EU Paris-aligned benchmarks (OJ L 406, December 3, 2020, p. 17).

## 5.2. Disclosure requirements in ESRS covered by the undertaking's sustainability statement (IRO-2)

ESRS	Disclosure requirements	Reference in Bolloré's sustainability statement	DP status <sup>(1)</sup>
ESRS 2 General disclosures	BP-1: General basis for preparation of sustainability statements	1.4. Methodological note on ESG reporting (basis for preparing the sustainability report)	Covered
	BP-2: Disclosure of information on specific circumstances	1.4. Methodological note on ESG reporting (basis for preparing the sustainability report)	Covered
	BP-2: Disclosures in relation to medium- or long-term time horizons		Omitted in 2024
	GOV-1: Role of administrative, management and supervisory bodies	1.2.2. Governance and control bodies	Covered
	GOV-2: Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	1.2.2. Governance and control bodies	Covered
	GOV-3: Integration of sustainability- related performance in incentive schemes	1.2.2. Governance and control bodies	Covered
	GOV-4: Statement on due diligence	1.2.3. Statement on due diligence	Covered
	GOV-5: Risk management and internal controls over sustainability reporting	1.2.4. Risk management and internal controls over ESG reporting	Covered
	SBM-1: Strategy, business model and value chain	1.3.11. Presentation of material IROs and their interaction with strategy and business model	The following DPs are partially covered in 2024: SBM1-21; SBM1-22; SBM1-23; SBM1-26; SBM1-27 and SBM1-28
	SBM-2: Interests and views of stakeholders	1.2.5; Dialogue with our stakeholders	Covered
	SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model	1.3. Management of impacts, risks and opportunities 1.3.10. Presentation of material IROs, consultation of stakeholders and interaction with strategy and business model 1.3.11. Presentation of material IROs and interaction with strategy and business model	The following DPs are partially covered in 2024: SBM3-03; SBM3-04 and SBM3-05 The following DPs are omitted in 2024: SBM3-06 and SBM3-08
	IRO-1: Description of the processes to identify and assess material impacts, risks and opportunities	1.3. 1. Identification of IROs and methodology of double materiality assessment	Partially covered in 2024
	IRO-2: Disclosure requirements in ESRS covered by the undertaking's sustainability statement	5. Appendices	Covered
ESRS E1 Climate change	ESRS 2 GOV-3: Integration of sustainability-related performance in incentive schemes	2.2.2. Factoring climate issues into Group strategy and climate governance	Covered
	ESRS 2 IRO-1: Description of the procedures for identifying and assessing material IROs	2.2.3. Climate change adaptation plan	Covered
	ESRS 2 SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model	2.2.2. Factoring climate issues into Group strategy and climate governance	Covered
	E1-1: Transition plan for climate change mitigation	2.2.4. Group's climate change-related decarbonization plan	Covered
	E1-2: Policies related to climate change mitigation and adaptation	2.2.4. Group's climate change-related decarbonization plan	Covered
	E1-3: Actions and resources in relation to climate change policies	2.2.4. Group's climate change-related decarbonization plan	Covered
	E1-4: Targets related to climate change mitigation and adaptation	2.2.4. Group's climate change-related decarbonization plan	Covered
	E1-5: Energy consumption and mix	2.2.4.4.1. Energy consumption and mix	Covered
	E1-6: Gross scopes 1, 2, 3 and Total GHG emissions	2.2.4.4.2. GHG emissions	Covered
	E1-7: GHG removals and GHG mitigation projects financed through carbon credits	2.2.4.5. Global offsetting of carbon emissions	Covered
	E1-8: Internal carbon pricing	2.2.4.6. Internal carbon pricing	Covered
	E1-9: Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	NA	Omitted in 2024 due to provisions being applied gradually

(1) The numbers correspond to the numbers in the Efrag's detailed ESRS datapoints implementation guidance dated December 22, 2023.

ESRS	Disclosure requirements	Reference in Bolloré's sustainability statement	DP status <sup>(1)</sup>
Entity-specific – Industrial and operating accidents	MDR-P: Policies adopted to manage material sustainability matters	2.3.1. Policies implemented	Covered
	MDR-A: Actions and resources in relation to material sustainability matters	2.3.2. Action taken to prevent the risk of industrial and operating accidents	Covered
	MDR-M: Indicators related to material sustainability indicators	2.3.2. Action taken to prevent the risk of industrial and operating accidents	Covered
	MDR-T: Tracking effectiveness of policies and actions through targets	2.3.3. Tracking effectiveness of policies and actions through targets	Covered
ESRS E5 Resource use and circular economy	ESRS 2 IRO-1: Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities	2.4.1.1. Description of the procedures for identifying and assessing IROs	Covered
	E5-1: Policies related to resource use and circular economy	2.4.1.2. Circular economy policies	Covered
	E5-2: Actions and resources related to resource use and circular economy	2.4.2.2. Resource use actions 2.4.3.2. Actions and resources related to the optimization of waste management	Covered
	E5-3: Targets related to resource use and circular economy	2.4.2.1. Targets related to resource use and circular economy 2.4.3.1. Targets for resource outflows	Covered
	E5-4: Resource inflows	2.4.2.2. Actions related to the optimization of resources	The E5-4 R31 DP is partially covered in 2024
	E5-5: Resource outflows	2.4.3.3. Resource outflows	DR E5-5. R37.b and c: details of the type of recovery and the type of waste disposal
	E5-6: Anticipated financial effects of impacts, risks and opportunities associated with resource use and the circular economy	NA	Omitted in 2024 due to provisions being applied gradually
ESRS S1 Own workforce	ESRS 2 SBM-2: Interests and views of stakeholders	3.1.8.2. Processes for engaging with own workforce and workers' representatives	Covered
	ESRS 2 SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model	3.1.2. Material impacts, risks and opportunities and their interaction with strategy and business model	Covered
	S1-1: Policies related to own workforce	3.1.3.1. Policies related to "working conditions and social dialogue in operations" 3.1.4.1. Policies related to: "diversity, equity and inclusion in operations" 3.1.5.1. Policies related to "training and skills development" 3.1.8.1. Health and safety policies	Covered
	S1-2: Processes for engaging with own workforce and workers' representatives about impacts	3.1.6. Processes for engaging with own workforce about impacts	Covered
	S1-3: Processes to remediate negative impacts and channels for own workforce to raise concerns	3.1.7. Processes to remediate negative impacts and channels for own workforce to raise concerns (whistleblowing systems and remediation processes)	Covered
	S1-4: Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	3.1.3.4. Measures to respond to IROs related to "working conditions and social dialogue in operations" 3.1.4.4. Measures to respond to IROs related to "diversity, equity and inclusion in operations" 3.1.5.4. Actions associated with IROs to respond to "training and skills development" 3.1.8.4. Description of action plans to manage impacts, risks and opportunities (IROs) related to health and safety	Partially covered, S1-4-02 was not covered in 2024

(1) The numbers correspond to the numbers in the Efrag's detailed ESRS datapoints implementation guidance dated December 22, 2023.

ESRS	Disclosure requirements	Reference in Bolloré's sustainability statement	DP status <sup>(1)</sup>
ESRS S1 Own workforce	S1-5: Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	3.1.3.3. Material IROs policy targets related to "working conditions and social dialogue (in operations)". 3.1.4.3. Material IROs policy targets related to "diversity, equity and inclusion in operations". 3.1.5.3. Material IROs policy targets related to "training and skills development" 3.1.8.5 Description of targets linked to the description of health and safety-related IROs	Covered
	S1-6: Characteristics of the Company's employees	NA	Omitted in 2024 due to provisions being applied gradually
	S1-7: Characteristics of non-employee workers in the undertaking's own workforce	3.1.9.2. Characteristics of non-employee workers in the undertaking's own workforce	Covered
	S1-8: Collective bargaining coverage and social dialogue	3.1.9.3 Collective bargaining coverage and social dialogue	Partially covered, S1-8-07 was not covered in 2024
	S1-9: Diversity metrics	3.1.9.4. Diversity metrics	Covered
	S1-10: Adequate wages	Irrelevant to the Bolloré Group	Covered
	S1-11: Social protection	NA	Omitted in 2024 due to provisions being applied gradually
	S1-12: Disabled persons	NA	Omitted in 2024 due to provisions being applied gradually
	S1-13: Training and skills development metrics	NA	Omitted in 2024 due to provisions being applied gradually
	S1-14: Health and safety metrics	3.1.9.5. Description of health and safety parameters	Covered
	S1-15: Work-life balance metrics	NA	Omitted in 2024 due to provisions being applied gradually
	S1-16: Compensation metrics (compensation gap and total compensation)	3.1.9.6. Compensation metrics (compensation gap and total compensation)	Covered
	S1-17: Serious human rights scenarios, complaints and incidents	3.1.9.7. Serious human rights scenarios, complaints and incidents	Covered
ESRS S2 Workers in the value chain	ESRS 2 SBM-2: Interests and views of stakeholders	3.2.3. Processes for engaging with value chain workers	Covered
	ESRS 2 SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model	3.2.1. Material IROs concerning workers in the value chain and interaction with strategy and business model	Covered
	S2-1: Policies related to value chain workers	3.2.2. Policies related to value chain workers	Covered
	S2-2: Processes for engaging with value chain workers about impacts	3.2.3. Processes for engaging with value chain workers	Covered
	S2-3: Processes to remediate negative impacts and channels for value chain workers to raise concerns	3.2.4. Description of channels that may be used by value chain workers to raise concerns	Covered
	S2-4: Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions	3.2.5. Description of action plans implemented in favor of workers in the value chain	Covered
	S2-5: Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	3.2.6. Description of objectives associated with the management of IROs linked to value chain workers	Covered

(1) The numbers correspond to the numbers in the Efrag's detailed ESRS datapoints implementation guidance dated December 22, 2023.



ESRS	Disclosure requirements	Reference in Bolloré's sustainability statement	DP status <sup>(1)</sup>
ESRS S4 Consumers and end users	ESRS 2 SBM-2: Interests and views of stakeholders	3.3.1. Description of material impacts and interactions with business strategy	Covered
	ESRS 2 SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model	3.3.1. Description of material impacts and interactions with business strategy	Covered
	S4-1: Policies related to consumers and end users	3.3.2.1. Policies on the data of consumers and end users 3.3.3.1. Policies on the safety of consumers and end users	Covered
	S4-2: Processes for engaging with consumers and end users about impacts	3.3.2.2. Processes for engaging with consumers and end users about the protection of their personal data 3.3.3.2. Processes for engaging with consumers and end users about their safety	Covered
	S4-3: Processes to remediate negative impacts and channels for consumers and end users to raise concerns	3.3.2.3. Description of channels for consumers and end users to raise concerns 3.3.3.3. Description of channels for consumers and end users to raise concerns	Covered
	S4-5: Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	3.3.3.5. Description of targets associated with consumer and end user safety	Covered
ESRS G1 Business conduct	ESRS 2 GOV-1: The role of the administrative, management and supervisory bodies	4.2. The role of the administrative, management and supervisory bodies in business ethics	Covered
	ESRS 2 IRO-1: Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities	4.3. Description of the process used in mapping risks to business ethics	Covered
	G1-1: Corporate culture and business conduct policies	4.4. Corporate culture and business conduct policies	Partially covered, G1-1-11 was not covered in 2024
	G1-2: Management of relationships with suppliers	4.4.1. Prevention	Covered
	G1-3: Prevention and detection of corruption and bribery	4.4.1. Prevention 4.4.2. Detection 4.5 Anticorruption system	Partially covered, G1-3-07 was not covered in 2024
	G1-4: Proven incidences of corruption of bribery	4.4.2. Detection 4.5.1. Results of corruption incidents in 2024	Covered
	G1-5: Political influence and lobbying activities	NA	NA
	G1-6: Payment practices	4.4.2. Detection	Covered

NA: not applicable.

(1) The numbers correspond to the numbers in the Efrag's detailed ESRS datapoints implementation guidance dated December 22, 2023.

## 6. Report on the certification of sustainability information and verification of the disclosure requirements under article 8 of regulation (EU) 2020/852

Year ended December 31, 2024

*This is a translation into English of the Statutory Auditors' report on the certification of sustainability information and verification of the disclosure requirements under article 8 of regulation (EU) 2020/852 of the company issued in French and it is provided solely for the convenience of English-speaking users. This report should be read in conjunction with, and construed in accordance with, French law and the H2A guidelines on "Limited assurance engagement on the certification of sustainability information and verification of disclosures requirements under article 8 of regulation (EU) 2020/852".*

To the General Shareholders' Meeting,

This report is issued in our capacity as Statutory Auditors of Bolloré SE. It covers the sustainability information and the information required by article 8 of regulation (EU) 2020/852, relating to the year ended December 31, 2024 and included in chapter 2 (the sustainability report) of the Group management report (this universal registration document).

Pursuant to article L. 233-28-4 of the French commercial code (*Code de commerce*), Bolloré SE is required to include the above-mentioned information in a separate section of the Group's management report. This information has been prepared in the context of the first-time application of the aforementioned articles, a context characterized by uncertainties regarding the interpretation of the legal texts, the use of significant estimates, the absence of established practices and frameworks, in particular for the double-materiality assessment, and an evolving internal control system. It enables to understand the impact of the activity of Bolloré SE on sustainability matters, as well as the way in which these matters influence the development of the business of the Group, its performance and position. Sustainability matters include environmental, social and governance matters.

Pursuant to article L. 821-54, II of the aforementioned Code, our responsibility is to carry out the procedures necessary to issue a conclusion, expressing limited assurance, on:

- compliance with the sustainability reporting standards adopted pursuant to article 29 ter of directive (EU) 2013/34 of the European Parliament and of the Council of December 14, 2022 (hereinafter ESRS for European Sustainability Reporting Standards) of the process implemented by Bolloré SE to determine the information reported, and compliance with the requirement to consult the social and economic committee provided for in the sixth paragraph of article L. 2312-17 of the French labor code (*Code du travail*);

- compliance of the sustainability information included in the sustainability report with the requirements of article L. 233-28-4 of the French commercial code (*Code de commerce*), including the ESRS, and;
- compliance with the reporting requirements set out in article 8 of regulation (EU) 2020/852.

This engagement is carried out in compliance with the ethical rules, including independence, and quality control rules prescribed by the French commercial code (*Code de commerce*).

It is also governed by the French High Audit Authority (H2A) guidelines on "Limited assurance engagement on the certification of sustainability information and verification of disclosure requirements set out in article 8 of regulation (EU) 2020/852".

In the three separate parts of the report that follow, we present, for each of the parts of our engagement, the nature of the procedures that we carried out, the conclusions that we drew from these procedures and, in support of these conclusions, the elements that to which we paid particular attention and the procedures that we carried out with regard to these elements. We draw your attention to the fact that we do not express a conclusion on any of these elements taken in isolation and that the procedures described should be considered in the overall context of the formation of the conclusions issued in respect of each of the three parts of our engagement.

Finally, where deemed necessary to draw your attention to one or more disclosures of sustainability information provided by Bolloré SE in the Group management report, we have included an emphasis of matter paragraph hereafter.

### LIMITS OF OUR ENGAGEMENT

As the purpose of our engagement is to provide limited assurance, the nature (choice of techniques), extent (scope) and timing of the procedures are less than those required to obtain reasonable assurance.

Furthermore, this engagement does not provide guarantee regarding the viability or the quality of the management of Bolloré SE, in particular it does not provide an assessment, of the relevance of the choices made by Bolloré SE in terms of action plans, targets, policies, scenario analyses and transition plans, which would go beyond compliance with the ESRS reporting requirements.

It does, however, allow us to express conclusions regarding the entity's process for determining the sustainability information to be reported, the sustainability information itself, and the information reported pursuant to article 8 of regulation (EU) 2020/852, as to the absence of identification or, on the contrary, the identification of errors, omissions or inconsistencies of such importance that they would be likely to influence the decisions that readers of the information subject to this engagement might make.

Our engagement does not cover any comparative information.

## Compliance with the ESRS of the process implemented by Bolloré SE to determine the information reported, and compliance with the requirement to consult the social and economic committee provided for in the sixth paragraph of article L. 2312-17 of the French labor code (*Code du travail*)

### NATURE OF PROCEDURES CARRIED OUT

Our procedures consisted in verifying that:

- the process defined and implemented by Bolloré SE has enabled, in accordance with the ESRS, to identify and assess its impacts, risks and opportunities related to sustainability matters, and to identify the material impacts, risks and opportunities that are disclosed in the sustainability report, and;

- the information provided on this process also complies with the ESRS. We also checked the compliance with the requirement to consult the social and economic committee.

## CONCLUSION OF THE PROCEDURES CARRIED OUT

On the basis of the procedures we have carried out, we have not identified any material errors, omissions or inconsistencies regarding the compliance of the process implemented by Bolloré SE with the ESRS.

Concerning the consultation of the social and economic committee provided for in the sixth paragraph of article L. 2312-17 of the French labor code (*Code du travail*), we inform you that as at the date of this report, this consultation has not yet taken place.

## EMPHASIS OF MATTER

Without qualifying the conclusion expressed above, we draw your attention to the information provided in sections 1. – General principles (transversal standards ESRS 1 and ESRS 2), 1.5.1. – The ESG reporting boundary and 1.4.3. – Scope of the double-materiality analysis of the sustainability report, which specify the scope used for the double-materiality analysis, particularly with regard to activities that have been disposed of or are in the process of being disposed of as at the reporting date.

## ELEMENTS THAT RECEIVED PARTICULAR ATTENTION

Below we present the elements that received particular attention from us with regard to the ESRS compliance of the process implemented by Bolloré SE to determine the information disclosed.

### CONCERNING THE IDENTIFICATION OF STAKEHOLDERS

The information regarding stakeholder identification is mentioned in sections 1.3.5. – Dialogue with our stakeholders (DR: SBM-2) and 1.4.10. – Presentation of significant IROs, stakeholder consultation, and interactions with strategy and business model (SBM-3) of the sustainability report. We have

reviewed the analysis carried out by Bolloré SE to identify stakeholders who can affect or be affected by the entities within the information scope, through their activities and direct or indirect business relations in the value chain.

### CONCERNING THE IDENTIFICATION OF IMPACTS, RISKS AND OPPORTUNITIES

The information regarding the identification of impacts, risks, and opportunities is presented in section 1.4.10. – Presentation of significant IROs, stakeholder consultation, and interactions with strategy and business model (SBM-3) of the sustainability report.

We have reviewed the process implemented by Bolloré SE for identifying impacts (negative or positive), risks, and opportunities ("IROs"), real or potential, in connection with the sustainability issues mentioned in paragraph AR 16 of the "Application requirements" of the ESRS 1 standard. We also exercised our professional judgment to assess the acceptability of exclusions related to affected communities (ESRS S3), pollution issues

(ESRS E2), water resource management issues (ESRS E3), and biodiversity (ESRS E4), as mentioned in section 1.4. of the sustainability report.

We have assessed:

- the activities included within the scope selected for the identification of IROs;
- the coherence of real and potential impacts, risks, and opportunities identified by Bolloré SE with available sector analyses and the Group's sustainability strategy.

### CONCERNING THE ASSESSMENT OF IMPACT MATERIALITY AND FINANCIAL MATERIALITY

The information regarding the assessment of impact materiality and financial materiality is presented in section 1.4. – Management of impacts, risks, and opportunities (SBM-3) of the sustainability report.

We have reviewed, through interviews with Management and inspection of available documentation, the process of assessing impact materiality and financial materiality implemented by Bolloré SE, and evaluated its compliance with the criteria defined by ESRS 1.

We specifically assessed:

- the manner in which Bolloré SE established and applied the materiality criteria defined by the ESRS 1 standard, including those related to threshold setting, to determine the material information disclosed in relation to the indicators of significant IROs identified in accordance with the relevant ESRS thematic standards;
- the appropriateness of the information provided in section 1.4. of the sustainability report.

## Compliance of the sustainability information included in the sustainability report with the requirements of article L. 233-28-4 of the French commercial code (*Code de commerce*), including the ESRS

### NATURE OF PROCEDURES CARRIED OUT

Our procedures consisted in verifying that, in accordance with legal and regulatory requirements, including the ESRS:

- the disclosures provided enable to understand the general basis for the preparation and governance of the sustainability information included in the sustainability report, including the basis for determining the information relating to the value chain and the exemptions from disclosures used;
- the presentation of this information ensures its readability and understandability;

- the scope chosen by Bolloré SE for providing this information is appropriate, and;
- on the basis of a selection, based on our analysis of the risks of non-compliance of the information provided and the expectations of users, this information does not contain any material errors, omissions or inconsistencies, i.e. that are likely to influence the judgment or decisions of users of this information.

## CONCLUSION OF THE PROCEDURES CARRIED OUT

Based on the procedures we have carried out, we have not identified material errors, omissions or inconsistencies regarding the compliance of the sustainability information included in the sustainability report, with the requirements of article L. 233-28-4 of the French commercial code (*Code de commerce*), including the ESRS.

## EMPHASIS OF MATTERS

Without qualifying the conclusion expressed above, we draw your attention to the information provided:

- paragraph 5.2 - Disclosure requirements in ESRS covered by the undertaking's sustainability statement (IRO-2) of the sustainability report, which presents incomplete or missing data points in the context of the first year of implementation of article L. 233-28-4 of the French commercial code (*Code de commerce*);
- paragraph 1.5 – Methodological note on ESG reporting (preparation bases of the sustainability report [BP-1; BP-2]) of the sustainability report, which describes the scope selected for presenting information, particularly concerning activities sold or in the process of being sold at the closing date;
- paragraph 3.1.9.6 – Remuneration metrics (pay gap and total remuneration) (S1-16) of the sustainability report, which specifies the methodology used to determine remuneration-related indicators.

## ELEMENTS THAT RECEIVED PARTICULAR ATTENTION

### INFORMATION PROVIDED IN APPLICATION OF ENVIRONMENTAL STANDARD ESRS E1

The information disclosed on climate change (ESRS E1) is mentioned in the Group's management report, presented in section 2.2. – Reducing the Group's carbon footprint and adapting to climate change (ESRS E1) of the sustainability report.

We present below the information to which we paid particular attention concerning the compliance of this information with the ESRS.

Our procedures consisted in particular of:

- assessing, based on interviews conducted with management or individuals responsible for sustainability, whether the description of policies, actions, and targets implemented by the Group covers the following areas: climate change mitigation and climate change adaptation;
- assessing, notably based on inspection procedures, the appropriateness of the information presented in section 2.2. – Reducing the Group's carbon footprint and adapting to climate change (ESRS E1) within the environmental section of the sustainability information included in the Group's management report and its overall coherence with our knowledge of the Group.

Concerning the information published in respect of greenhouse gas emissions:

- we reviewed the reporting and control procedures implemented by the Group aimed at ensuring the compliance of published information, particularly concerning direct emissions (scope 1), indirect emissions related to electricity (scope 2), and some other indirect emissions in the value chain (scope 3);

- we assessed the consistency of the scope considered for the assessment of the greenhouse gas emissions balance sheet with the scope of the consolidated financial statements, activities under operational control, and the upstream and downstream value chain;
- we reviewed the greenhouse gas emissions inventory protocol used by the Group to draw up the greenhouse gas emissions balance sheet and assessed its application to a selection of emission categories and sites, for scope 1 and scope 2;
- with regard to scope 3 emissions, we assessed:
  - the justification for the inclusion and exclusion of various categories and the transparency of the information provided in this respect,
  - the information gathering process;
- we assessed the appropriateness of the emission factors used and the calculation of related conversions as well as the calculation and extrapolation assumptions, taking into account the inherent uncertainty in the state of scientific or economic knowledge and the quality of external data used;
- we interviewed management to understand the main changes in business activities during the period that are likely to have an impact on the greenhouse gas emissions balance sheet;
- for physical data (such as energy consumption), we reconciled the underlying data used to draw up the greenhouse gas emissions balance sheet with the supporting documents;
- we performed analytical procedures;
- we verified the arithmetic accuracy of the calculations used to establish these consolidated information.

### INFORMATION PROVIDED IN APPLICATION OF SOCIAL STANDARD ESRS S1

The information disclosed on own workforce (ESRS S1) is mentioned in the Group's management report, presented in section 3.1. – Engage and protect women and men, the company's greatest strength (ESRS S1) of the sustainability report.

We present below the information to which we paid particular attention concerning the compliance of this information with the ESRS.

Our main procedures consisted of:

- based on interviews conducted with Management or individuals we deemed appropriate, particularly the Human Resources Department:
  - understanding the process of collecting and compiling qualitative and quantitative information for the publication of material information in the sustainability statement,
  - reviewing the underlying available documentation,
  - performing procedures to verify the correct consolidation of these data,
  - assessing whether the description of policies, actions, and targets established by the entity covers the following areas: working conditions and particularly social dialogue, talent retention, training and skills development, diversity and inclusion, health and safety, and remuneration;

- assessing the appropriateness of the information presented in section 3.1. – Engage and protect women and men, the company's greatest strength (ESRS S1) within the social section of the sustainability information included in the Group management report, and its overall coherence with our knowledge of the Group.

We also:

- reviewed the reporting and control procedures implemented by the Group aimed at ensuring the compliance of disclosed information;
- examined the legal scope on which the information was drawn up;
- defined and implemented analytical procedures appropriate to the information reviewed in light of changes in business activities;
- sampled and reviewed supporting documents along with the corresponding information;
- verified the arithmetic accuracy of the calculations used to establish this information where applicable.

## Compliance with the reporting requirements set out in article 8 of regulation (EU) 2020/852

### NATURE OF PROCEDURES CARRIED OUT

Our procedures consisted in verifying the process implemented by Bolloré SE to determine the eligible and aligned nature of the activities of the entities included in the consolidation.

They also involved verifying the information reported pursuant to article 8 of regulation (EU) 2020/852, which involves checking:

- the compliance with the rules applicable to the presentation of this information to ensure that it is readable and understandable;

- on the basis of a selection, of the absence of material errors, omissions or inconsistencies in the information provided, i.e. information likely to influence the judgment or decisions of users of this information.

### CONCLUSION OF THE PROCEDURES CARRIED OUT

Based on the procedures we have carried out, we have not identified any material errors, omissions or inconsistencies relating to compliance with the requirements of article 8 of regulation (EU) 2020/852.

### EMPHASIS OF MATTER

We have determined that there are no such matters to report in our report.

Paris-la Défense and Neuilly-sur-Seine, April 30, 2025

The Statutory Auditors

Deloitte & Associés  
Tour Majunga – 6, place de la Pyramide – 92908 Paris-la Défense Cedex

Thierry Quéron  
Julien Rivals

Grant Thornton  
French member of Grant Thornton International  
29, rue du Pont – CS 20070 – 92578 Neuilly-sur-Seine Cedex  
Jean-François Baloteaud