

Supplier Code of Conduct

Introduction

Orange SA and its subsidiaries (“Orange”), acts in accordance with the Orange group’s Code of Ethics and Anti-Corruption Policy, available on Orange’s website at

<https://gallery.orange.com/rse#om=84c5ab25-8814-467f-9d73-dde3b6088b41&v=d20662f2-c8b6-43ba-ae0b-54fe33bcbd0c>

and with its “Commitments to Responsible Procurement,” available at

<https://fournisseurs.orange.com/en/welcome-to-the-website/>

Based on Orange’s core values pertaining to business ethics and social and environmental commitments, Orange requires the Supplier to comply with the principles set out below (hereinafter the “Principles”).

The Supplier shall make every effort to implement said Principles across its entire supply chain.

This **Supplier Code of Conduct** is not intended to replace the applicable laws and regulations in force in the countries in which Orange’s supply chain operates.

PRINCIPLES

1- Relationship with national and international law

In addition to complying with the provisions described in articles 1 to 6 below, the Supplier must always comply with applicable laws and regulations, and with the contractual obligations as agreed between the Parties. This includes the US Foreign Corrupt Practices Act and the UK Bribery Act where applicable. The Supplier must also comply with any international economic sanctions (including embargoes and trade and financial restrictions), which include any sanctions that might be in force as a result of a resolution adopted by the United Nations Security Council

under Chapter VII of the United Nations Charter, as well as any sanctions that may, in particular, have been imposed by the European Union.

The Supplier shall instruct its agents, suppliers, partners, subcontractors and each of their representatives (hereinafter collectively referred to as the “Third Parties”) to adhere to the Principles of the Supplier Code of Conduct insofar as they are directly or indirectly involved in the provision of products or services under the Agreement.

2- Underlying principles

The Supplier must respect internationally defined human rights and must avoid complicity in any human rights violations. The Supplier must respect the dignity, privacy and rights of each individual. Slavery, in all its forms, is prohibited. The Supplier will also do its utmost to comply with all the standards developed by the International Labour Organization (ILO).

3- Social responsibility best practices

3.1 Freedom of association and right to collective bargaining

The Supplier must make every effort to implement internationally recognized standards, such as the ILO conventions, without violating applicable national law. It must ensure that its employees and representatives, including temporary workers, can openly express themselves within their company on any matters relating to their working conditions.

3.2 Child labor

The Supplier is prohibited from employing any person under the age of 15, under the age for completing compulsory education, or under

the legal age for employment in the country, whichever is higher.

It must take all measures to enforce this prohibition in its supply chain. If a child is found to be working at the premises of the Supplier or one of its subcontractors, the Supplier must immediately take all measures to remedy the situation so as to best serve the interests of the child.

3.3 Non-discrimination and diversity

The Supplier must treat all employees with respect and must not use corporal punishment, physical or psychological coercion, any form of abuse, harassment or threats.

The Supplier must fight against all forms of discrimination based on criteria related in particular to ethnic origin, skin color, gender, sexual orientation, language, disability, religion, political or other opinion, national or social origin, age. It must ensure respect for professional equality between women and men and promote diversity, equal opportunities and equal treatment in matters of employment and occupation.

3.4 Inclusion

The Supplier must facilitate the implementation of inclusive practices, and favor the use of the integration sector, the sector adapted for people with disabilities and other collaborations with social and solidarity economy actors.

3.5 Prohibition on the use of slavery and forced labor

The Supplier must comply with the United Nations Universal Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and all applicable regulations prohibiting slavery, including modern slavery, human trafficking, and all forms of forced or compulsory labor under the ILO's Forced Labour Convention.

In particular, all work must be voluntary and workers must be free to leave their work or

terminate their employment with reasonable notice.

The Supplier must not hold, destroy, hide or confiscate identity or immigration documents such as work permits, nor withhold employee access to these documents, except as required by law.

Furthermore, the Supplier must work to eliminate the risk of modern slavery in its supply chain.

3.6 Remuneration

The Supplier must provide remuneration in accordance with national minimum wage regulations. In the absence of national regulations, remuneration must be sufficient to cover basic needs such as housing, food and healthcare, and meet the standards of ILO C131 - Minimum Wage Fixing Convention. The basis on which workers are paid must be clearly communicated to them. The Supplier must not use wage deductions as disciplinary measures.

3.7 Working hours

Working hours, including overtime, must comply with applicable national laws. In the absence of national law, ILO standards must apply. In particular, the normal workweek must not exceed 48 hours, excluding overtime which may not exceed 12 hours. Workers must be entitled to at least one day of rest for every seven-day period. The Supplier must ensure that all workers receive paid leave.

3.8 Health and safety

The Supplier must provide its workers with a safe and healthy work environment, particularly with respect to fire protection and sanitation of the premises.

The Supplier must take the necessary measures to prevent accidents and occupational illnesses.

The Supplier must regularly provide suitable training to ensure that workers have sufficient knowledge of health and safety issues. This shall include the provision of appropriate

personal and collective protective equipment and instructions on how to use it.

If the Supplier provides housing, it must ensure that such housing is clean and safe and meets the basic needs of workers and, as applicable, their families.

The Supplier is encouraged to implement an Occupational Health and Safety Management System based on international standards such as ISO 45001 or an equivalent standard.

4- Fight against climate change and environmental protection

The Supplier shall comply with environmental laws and regulations and shall also implement measures that help protect the environment: fight against climate change and conservation of natural resources and biodiversity.

The Supplier must minimize the negative environmental impacts of its products and services throughout their life cycle.

The Supplier is encouraged to implement an Environmental Management System based on international standards such as ISO 14001 or a similar standard.

4.1 Reduction in greenhouse gas emissions

Orange is committed to aligning with an emissions trajectory compatible with the 1.5°C goal of the Paris Agreement and recommends that its suppliers align with a similar trajectory. The Supplier must monitor and document greenhouse gas emissions for scopes 1 and 2, as well as scope 3 if Orange so requests, in accordance with the GHG Protocol or other equivalent standards. It must also work toward setting an emissions reduction target. These elements, as well as other data relating to the greenhouse gas emissions of the Supplier's products/services, will be provided to Orange upon request. Under no circumstances must the use of carbon offsetting be a substitute for actions to reduce greenhouse gas emissions.

4.2 Energy consumption

The Supplier must undertake to keep its own energy consumption at the lowest possible level. It must also offer products and services that generate the lowest possible energy consumption and greenhouse gas emissions throughout their life cycle.

4.3 Circular economy

The Supplier must develop its use of eco-design and implement circular economy principles throughout the life cycle of the product or service: extraction of raw materials, manufacturing, transport, distribution, use, repair, reuse, recycling and treatment of final waste.

The Supplier must make every effort to offer refurbished equipment and spare parts from the circular economy.

4.4 Raw materials

The Supplier must reduce the use of raw materials in its supplies and in the manufacture of products and packaging. It must encourage the use of recycled raw materials.

The Supplier shall make every effort to ensure mineral traceability and must promote transparency in its supply chain. If minerals from conflict-affected areas are identified, the Supplier must take all necessary measures to limit the negative social and environmental impacts and to help develop responsible trade within the mineral extraction industry.

The use of critical raw materials – as defined in particular by the European Union – must be avoided or limited as much as possible. The Supplier must encourage alternatives or the use of recycled resources.

Information on raw materials must be provided if Orange so requests.

4.5 Product composition

The Supplier shall comply with all applicable laws and regulations regarding information on product composition, including those relating to hazardous substances and chemicals, such as the REACH regulation, and those relating to

electrical and electronic equipment, such as the RoHS regulation. The Supplier understands that it shall apply the RoHS regulation regardless of the delivery country, including in countries outside the European Union.

4.6 Waste management

The Supplier must identify, monitor and treat the waste from all its activities in accordance with applicable regulations.

It must minimize the amount of waste in order to reduce the environmental impact.

It must, in addition, comply with the Orange rules communicated by Orange regarding the collection and treatment of Orange waste, in particular the rules on waste electrical and electronic equipment (WEEE).

4.7 Pollution prevention

The Supplier must, as far as possible, avoid all hazardous discharges. The Supplier shall characterize, monitor, manage and treat air, water and soil pollutants before they are discharged.

4.8 Environmental permits and reporting

All environmental permits (for discharge monitoring, for example), authorizations and registrations must be obtained, maintained and kept current by the Supplier, and the Supplier must comply with their operational and reporting requirements.

4.9 Conservation of biodiversity

The Supplier must make every effort to identify and reduce the negative impacts on biodiversity of its activities and of the products and services that it provides to Orange. Biodiversity means the diversity of all living beings, of their genes, of the ecosystems in which they live, and of species' interactions with each other and with their environments.

5- Prohibited business practices (section on compliance)

5.1 Corruption and influence peddling

The Supplier must refrain from all forms of corruption and influence peddling and even

from actions that could potentially be interpreted as such.

The Supplier may not, directly or indirectly, offer, promise or provide unlawful benefits to national or international public officials or agents, or to national or international decision-makers operating in the private sector, in order to receive preferential treatment or obtain a favorable decision in the public or private sector. The same applies to donations, gifts or invitations to business meals or events.

The Supplier may not allow benefits to be promised or offered to it and may not accept any benefits if this gives or is likely to give the party providing the benefits the impression that this might influence the Supplier's business decisions. Similarly, the Supplier may not request any benefits.

The Supplier must avoid conflicts of interest that could lead to risks of corruption.

If the Supplier is also an Orange customer, it may not take unfair advantage of this situation and must keep purchases and sales strictly separate.

The Supplier undertakes to comply with all applicable laws as well as with the Compliance Rules and the commitments defined in the "Compliance" article of the Agreement, and requires the same of its directors, officers, employees, subsidiaries, controlled companies and Third Parties.

The Supplier also undertakes to ensure that the necessary means used by the Supplier, its subsidiaries and Third Parties to perform the Contract comply with applicable laws and the above-referenced Compliance Rules.

To ensure compliance with these laws, Compliance Rules, and Principles for the entire term of the Contract, the Supplier shall provide to Orange, upon request and at any time, all the information needed to demonstrate such compliance and shall immediately inform Orange if it becomes aware, or has reason to believe, that the Supplier itself or a Third Party

has failed to comply with these laws, Principles, or Compliance Rules. It shall also immediately inform Orange of the corrective measures taken to restore compliance with these laws and Compliance Rules.

A material failure to comply with these laws, Principles, or Compliance Rules may result in the suspension and/or termination of the Agreement in accordance with its provisions.

5.2 Competition

The Supplier must comply with the rules of free and fair competition in all business relationships and must, in particular, not act contrary to any competition and/or antitrust law.

5.3 Partnerships

All measures related to partnerships must comply with applicable legislation.

5.4 Political contributions

The Supplier may not donate money or provide financial benefits to political parties beyond what is allowed under the law.

5.5 Money laundering

The Supplier must take all necessary measures to prevent money laundering within its sphere of influence.

5.6 Data security and protection

The Supplier must comply with all applicable data protection laws, as well as with all the specific data protection and security requirements set out in the Agreement.

6- Social/environmental/compliance audits and monitoring

To ensure compliance with the Principles for the entire term of the Agreement, the Supplier shall provide to Orange, upon request and at any time, all the information needed to demonstrate such compliance. It shall immediately notify Orange if it becomes aware, or has reason to believe, that the Supplier itself or one of its subcontractors has failed to comply with the Principles. It shall take the appropriate corrective measures and shall

implement and monitor an improvement plan within the specified time so as to restore compliance with the Principles.

If not covered by the Agreement, the following will apply for social, environmental and compliance audits: Orange and/or its authorized representative will have the right to conduct monitoring activities on the Supplier and its subcontractors to assess the Supplier’s and its subcontractors’ compliance with the Principles.

This includes Orange’s and/or its authorized representative’s right to conduct audits, including on-site inspections, and to conduct questionnaires and interviews with workers selected without restriction at the Supplier’s premises, manufacturing sites and/or other locations where work is performed on the Supplier’s behalf. The Supplier acknowledges that Orange has the right to request and receive additional information (for example, external or internal CSR maturity assessments), if deemed necessary. At Orange’s request, the Supplier will inform Orange of the measures adopted to ensure compliance with the Principles.

7- Reporting mechanism

The Orange group has implemented a reporting mechanism that covers corruption, influence peddling, violations or fraud in accounting, internal control and audit, as well as serious environmental violations, serious violations of human rights and fundamental freedoms, and serious violations of the health and safety of persons.

It can be found on the Internet at the following URL: <https://orange.integrityline.org>