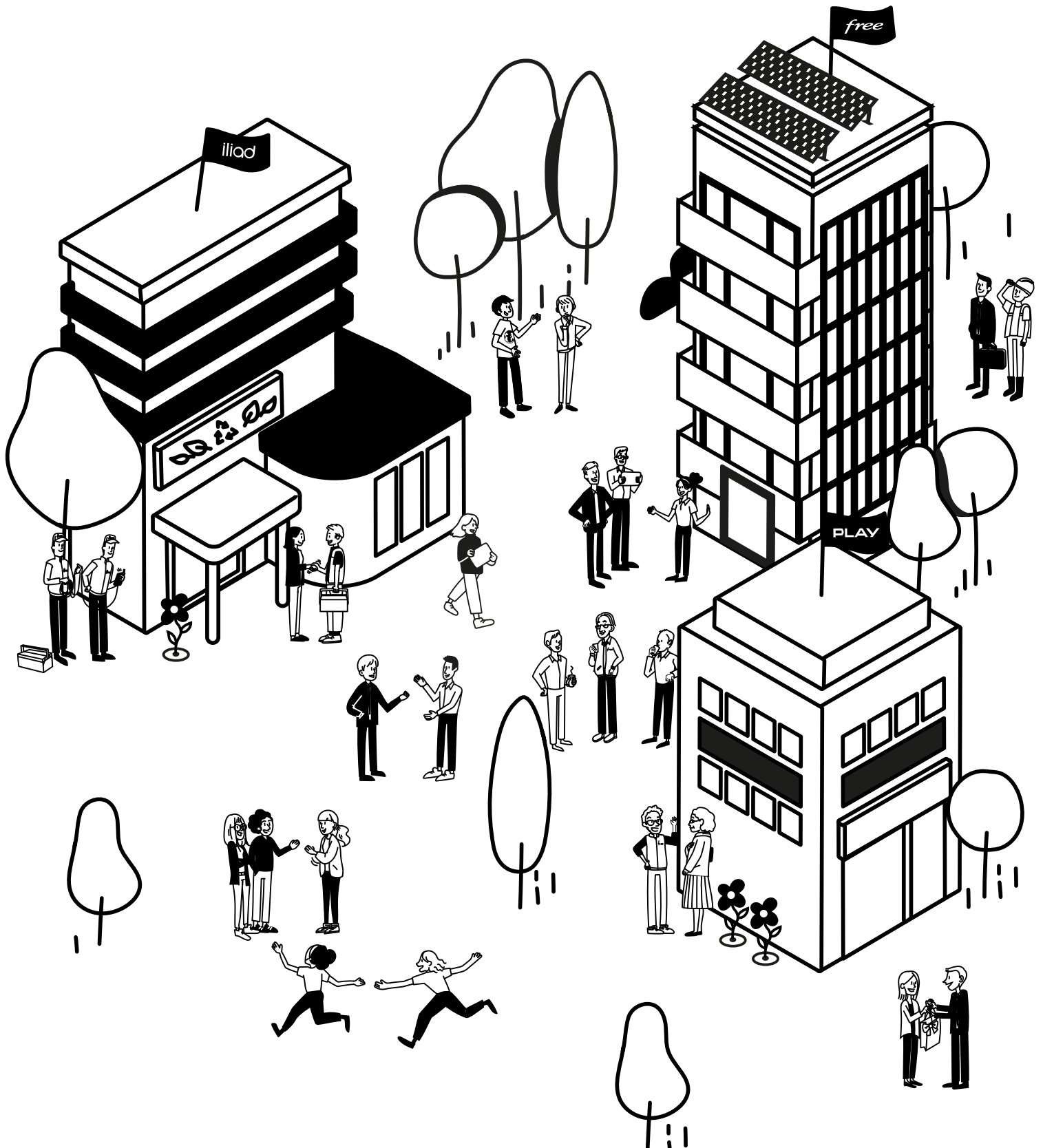# 2022 Non-Financial Performance Report

4. Non-financial performance

4.1 INTRODUCTION – OUR CORPORATE SOCIAL RESPONSIBILITY POLICY

4.1.1 Our mission

"At iliad, we firmly believe that the digital revolution is a means of progress for everyone, by shaking up usages, business models and even the structures of society.

Over the past 20 years, we have both driven and partnered this revolution throughout France. By inventing the Freebox – the world's first triple-play box – we were the ones who brought Internet to many households. And with our generous, no-commitment Mobile plans, we have also helped bring mobile usage within everyone's reach.

Today, we are taking this mission ever further by providing access to Ultra-Fast Broadband via the rollout of our Fiber and 5G networks everywhere we operate.

In 2018, we entered the Italian Mobile market with the same credo: digital revolution for everyone. And in 2020, we acquired Play – the leading mobile operator in Poland – because its DNA is similar to ours and it will enable us to address the Polish market with the same vision. 2022 was the year of convergence: the January 2022 launch of our Fiber offer in Italy and the April 2022
acquisition of UPC Polska have made the iliad Group a convergent operator in each of these host countries. B2C and B2B convergence is another priority for the Group. In France, the early 2021 launch of our B2B offers is helping intensify the digital transformation of French SMEs, the merger between Play and UPC Polska will enable us to address the Business market optimally in Poland, and we aim to launch our B2B offers in Italy in 2023.*

In recent years, the environmental crisis, changes in society's expectations, combined with increasing inequalities, have transformed the world we live in. The war in Ukraine has brought to light structural weaknesses in the European electricity market, sparked an inflationary shock and disrupted countless industries. Our entrepreneurial spirit, our culture of insourcing and our thirst for innovation will all be assets in meeting these new challenges and bringing about an inclusive, supportive and environmentally friendly digital revolution for the coming decade."

Thomas Reynaud – Chief Executive Officer of the iliad Group

This chapter is an integral part of the management report, in accordance with Articles L. 225-102-1, R. 225-105 and R. 225-105-1 of the French Commercial Code on transparency requirements for 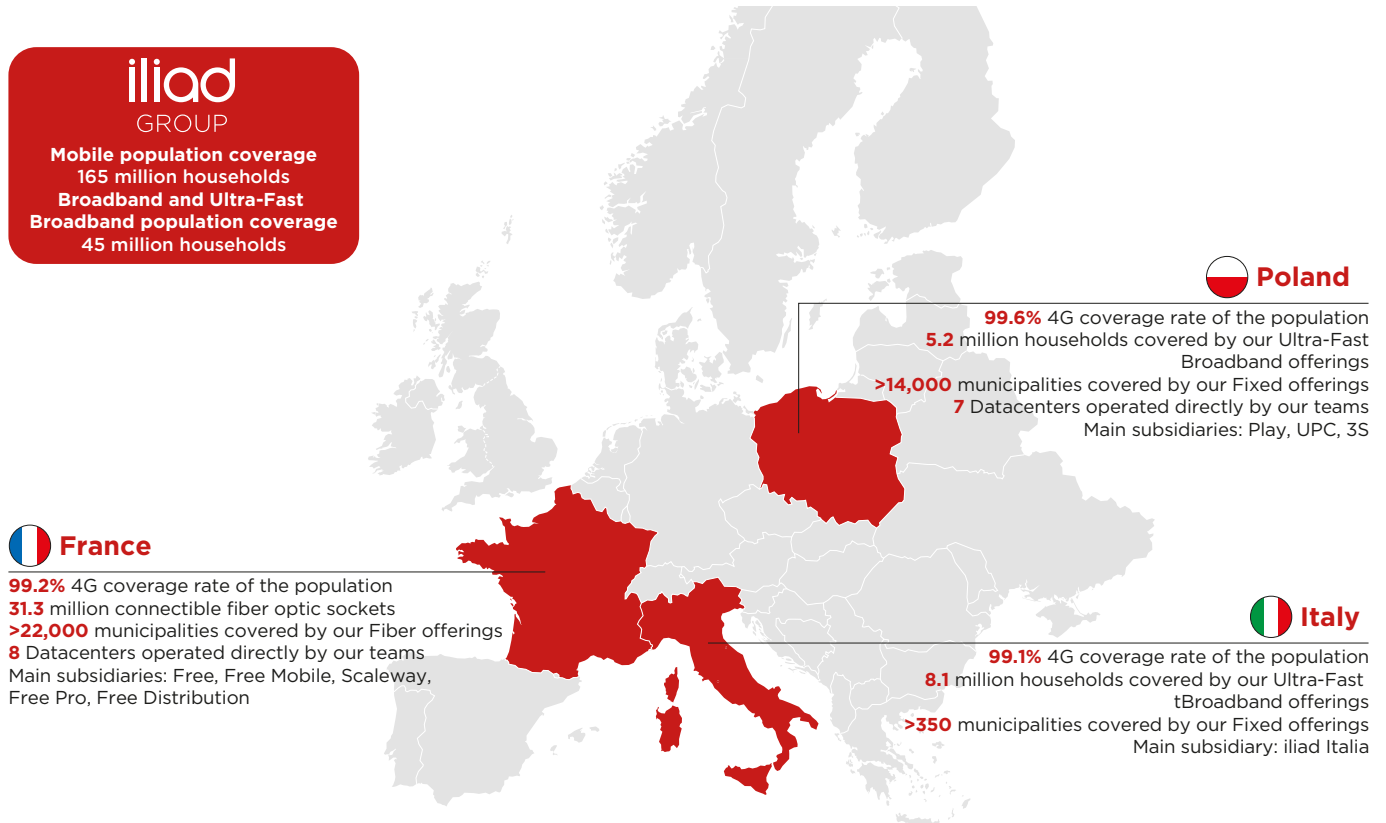companies. The Group takes a continuous improvement approach to disclosing its CSR data and information related to human rights, based on a map of its specific risks and opportunities and an internal reporting process.

4.1.2 Presentation of the Group's business model

The iliad Group is a major player in the European telecommunications market. Our operating presence in three of the European Union's five largest countries means that our corporate social responsibility (CSR) is inextricably linked to our business objectives. The Group uses latest-generation networks, along with significant financial, human, environmental and technical resources, to support its Fixed, Mobile and Cloud services. With their vast expertise, the Group's employees bring their added value to each step in the process as do all the stakeholders we have contact with.

Scope of our business model

iliad
GROUP
**Mobile population coverage
165 million households
Broadband and Ultra-Fast
Broadband population coverage
45 million households**

Poland
99.6% 4G coverage rate of the population
5.2 million households covered by our Ultra-Fast Broadband offerings
>14,000 municipalities covered by our Fixed offerings
7 Datacenters operated directly by our teams
Main subsidiaries: Play, UPC, 3S

France
99.2% 4G coverage rate of the population
31.3 million connectible fiber optic sockets
>22,000 municipalities covered by our Fiber offerings
8 Datacenters operated directly by our teams
Main subsidiaries: Free, Free Mobile, Scaleway, Free Pro, Free Distribution

Italy
99.1% 4G coverage rate of the population
8.1 million households covered by our Ultra-Fast tBroadband offerings
>350 municipalities covered by our Fixed offerings
Main subsidiary: iliad Italia

Our strategy

Ever since its formation, the iliad Group has always placed network rollouts – and regional digital development – at the heart of its strategy. In order to sustain its market positions and maintain its competitiveness, the Group's strategy is based on three pillars:

- **simple and affordable offers.** We invent solutions to allow everyone to access digital technologies simply and affordably. We believe that the starting cost for consumers should be as fair as possible. Our rates were game-changers in the telecoms market;

- **rollout of directly owned infrastructure throughout the country,** and in partnership where standalone rollout does not make economic sense. We believe that everyone should have access to our communication technologies regardless of where they are. That is why we have chosen to develop our own fixed and mobile infrastructure throughout the country, in urban and rural areas alike. And our rates are the same everywhere;

- **organization built on diversity and openness.** The digital language is a universal one and the Internet an aspiration to connect all individuals. This vision is embodied in the formidable diversity of our teams. We also seek to ensure that everyone can find their place in our company, by fostering autonomy and accountability rather than inflexible hierarchies.

The Group needs a variety of resources to create the right conditions for the execution of its strategy:

OUR RESOURCES

Financial capital	Industrial capital	Intellectual capital	Human capital	Environmental capital
• At end-2022, **100%** of outstanding shares were owned by Xavier Niel and the Group's management • Net value of licenses: **€3.8 billion** • Net value of network equipment: **€7.2 billion** • Equity: €5.2 billion	• More than **50,000** active mobile sites in Europe (nearly **24,000** in France, nearly **17,000** in Italy including the Zefiro joint venture with Wind Tre, nearly **10,600 in Poland)** • **39.4** million households covered by our FTTH offers in France and Italy, and **5.2** million households covered by our HFC/FTTx offers in Poland • **€2.1** billion in net investments excluding licenses in 2022, **€3.3** billion including licenses	• Free was ranked **50th** among the most valued brands in France, according to Brand Finance • Owner of the Freebox operating system • iliad is the favorite telecom brand in Italy (BVA Doxa, Q4 2022)	• More than **16,700** employees in Europe and Morocco, 92% of whom have permanent work contracts • Nearly **3,100** employees in our contact centers • Nearly **1,200** employees in our distribution network in France • Constant growth in the workforce over the past 13 years • The Free Foundation working to make digital technology available to as many people as possible	• **Ambitious environmental objectives** including reductions in Scope 1 & 2 emissions by 2035 of **95%** in France (compared with 2019) and **98%** in Italy (compared with 2020) • Energy consumption representing **174k** tonnes of CO_2 equivalent (market-based, Scopes 1 & 2) in 2022 • ISO 27001 and HDS certification of our data centers in France + ISO 50001 for the Scaleway data centers; data centers in Europe representing over **34 MW** of IT power • Freebox delivery/return system to make recycling easier

Stakeholders, both internal and external, are central to our business model. Our employees, subscribers, suppliers, partners and institutions, as well as our investors all play a role in creating and sharing value.

IMPACTS OF OUR BUSINESS MODEL

Strong market positions	Commercial success	High-quality brand identity and service	An outstanding contributor to society	Contribution to environmental protection and reducing global warming
• Group revenues of **€8.4** billion (**+7%** organic pro forma) • EBITDAaL €**3.3** billion (**+8%** organic pro forma) • **45.9** million subscribers in Europe, of which **36.5** million mobile and **9.3** million fixed • **4.7 million** fiber subscribers in France (1st after the incumbent operator)	• **2.7** million new subscribers in Europe, of which • **1.2** million in Italy • **0.8** million in France • **0.7** million in Poland	• In 2022, Free was ranked **no. 1** (as in 2021) in fixed-line performance in the nPerf study • iliad Italia was ranked by GfK among the 10 fastest-growing brands in Italy in 2022 • Play was ranked no. 1 mobile brand in terms of first choice purchasing and spontaneous awareness • Free was ranked **no. 2** in 2022 for the performance of its Mobile network in France • More than **20 GB/month** of data per 4G subscriber in France	• Nearly **500** net new hires in 2022 in France • €**525** million in payroll costs in 2022, up 19% year on year (up 14% excluding UPC Polska) • A leading corporate taxpayer in France, with **194 million** paid in 2022	• Scope 1 & 2 energy consumption (market-based) down **18%** (pro forma) • **2,256** tonnes of Freebox materials recycled in France, including **1,240** tonnes of plastic

Our commitments

The Internet is not an ordinary innovation. It allows universal access to information and in doing so disrupts not only the way we communicate with each other, but also our relationship to knowledge. From the outset, the iliad Group's founders realized that the Internet was an essential service and that everyone should have access to it in the same way as for other such services. On the strength of this belief, they founded Free and revolutionized the telecoms market in France. Since 2018, the Group has been exporting its values across Europe for the good of consumers, individuals and businesses.

The Free revolution has forged the iliad Group's identity and commits the Group to embodying its motto: Liberty, Honesty, Simplicity:

We are committed to defending the value of Liberty

Driven by a resolute belief in consumer freedom, we shook up the French telecoms market right from the outset with our no-commitment plans. For us, liberty involves defending consumer rights, and we've always fought against monopolies and dominant positions which restrict consumer choices. And liberty is also about having high-quality connectivity, which frees up usages. Thanks to fiber, 4G and 5G, we're shaping a world where everyone can be globally connected, anywhere, at any time, and with no barriers.

We are committed to defending the value of Honesty

We've always campaigned for fair prices in the telecoms sector, and were the first operator to bring unlimited calls and text messages within everyone's reach thanks to our Free Mobile Plan costing less than €20 a month. We invest heavily in our infrastructure to deliver the most cost-effective service. Honesty also means being transparent about the impacts of our activity on the environment and reducing it wherever possible. And we are pursuing our efforts relentlessly on that score.

We are committed to defending the value of Simplicity

Our products are at the cutting edge of technological innovation, but we've always sought to make them easy to use. Our plans and packages are ultra-clear and straightforward, such as our 2 hours-for-€2 plan. This simplicity doesn't come out of the blue – it's a direct reflection of how our Group is organized. We don't like heavy hierarchical structures that complicate decision-making and much prefer flexibility, agility and autonomy.

4.1.3 Our stakeholders

We need to be closely attuned to our stakeholders to run our business effectively.

To ensure that we constantly maintain the links with our ecosystem, we use several channels of dialog depending on the stakeholder concerned.

For the purposes of the materiality analysis currently in process, the CSR Committee has drawn up the following table of the Group's main stakeholders:

Stakeholder	Dialog and interaction channels
Human capital Employees Employee representative bodies Job candidates Interns, work-study students	The Group's people are its greatest asset. We therefore place great importance on nurturing their engagement and ensuring the long-term appeal of our employer brand. To that end, the Group maintains constructive dialog and close relationships with its employees. The Group also works closely with the educational establishments that teach and train the talent of tomorrow.
Subscribers B2C subscribers B2B subscribers (Local authorities)	At all levels of the organization we build up long-term relationships with our subscribers, underpinned by close and regular contact. We frequently hold in-depth discussions with our communities in order to fully understand their needs and expectations.
Financial players Bondholders Banks Financial analysts Rating agencies	The Group keeps up a steady stream of dialog with financial players, providing them with transparent, high-quality information about its strategic choices and its business. Through these exchanges, we are able to understand and anticipate their expectations, particularly in terms of governance and environmental and social performance. We also respond to the questionnaires issued by the main financial and non-financial rating agencies.
Suppliers and subcontractors	The quality of our supplier relations is a powerful competitive asset. The Group builds up long-term trusted partnerships with its major suppliers. This trust includes holding strategic meetings with them that lead to mutual improvements in terms of innovation and CSR.
Public authorities	The Group strictly respects all of the applicable regulations and ethical rules wherever it conducts business. Thanks to our strong regional presence, we have been able to forge close dialog with local public authorities. We ensure that we provide transparent and reliable regulatory information.
Partners Industry bodies Universities and colleges Start-ups	We operate in a wide ecosystem in which it is vital to anticipate major social trends and bring on board new expertise. The Group is therefore a member of various professional associations and participates in joint working groups with organizations such as ARCEP, AFEP and Ademe.
Civil society Local communities Media and journalists NGOs and non-profits	The Group is committed to building up a relationship of trust with civil society. We regularly talk to the press, post on social media and take part in local forums to give information to local communities and get their feedback. The Free Foundation's activities also enable our employees to get involved in projects with local charities and other non-profits, with the Group's backing. We also participate in think-tanks working towards a low-carbon economy and responsible digital technology, notably Entreprises pour l'Environnement (the French partner organization of the World Business Council for Sustainable Development).

4.1.4 A Group focused on the digital revolution

### 4.1.4.1 A strategic approach based on dedicated governance

Human resources, social and environmental challenges are central to the iliad Group's strategy and are managed at the highest level of governance:

- within the Board of Directors, the iliad Group established a CSR Committee with three members at the end of 2022. Its role is to oversee the iliad Group's ESG (Environment, Social and Governance) objectives, action plans and outcomes. It is chaired by Jacques Veyrat (independent director);

- the CSR Steering Committee, which meets several times a year, brings together the heads of key functions of the Company to discuss action plans, initiatives announced by our peers and in adjacent sectors, and progress made on these cross-cutting challenges. It is chaired by Group CEO Thomas Reynaud. The recruitment of a new Group CSR Director is underway, and the person chosen will eventually chair the CSR Steering Committee;

- operationally, each department manager is tasked with overseeing the proper functioning of the environmental and human resources data collection process and its passage through the reporting network;

- in 2022, the Finance Department established a steering committee to address sustainable finance challenges. It is tasked with ensuring the reliability of the reporting process and non-financial information, the calculation of indicators relating to the European Taxonomy, and the selection and evaluation of climate scenarios, including the targets to be submitted to the SBTi.

4.1.4.2 Identifying risks and opportunities

The Group embarked on its first materiality analysis at the end of 2021 (preliminary results were used in our 2021 non-financial performance information statement). The full findings were delivered in December 2022. As part of this exercise, interviews were conducted with internal and external stakeholders in order to update the Group's imperatives and identify new emerging risks.
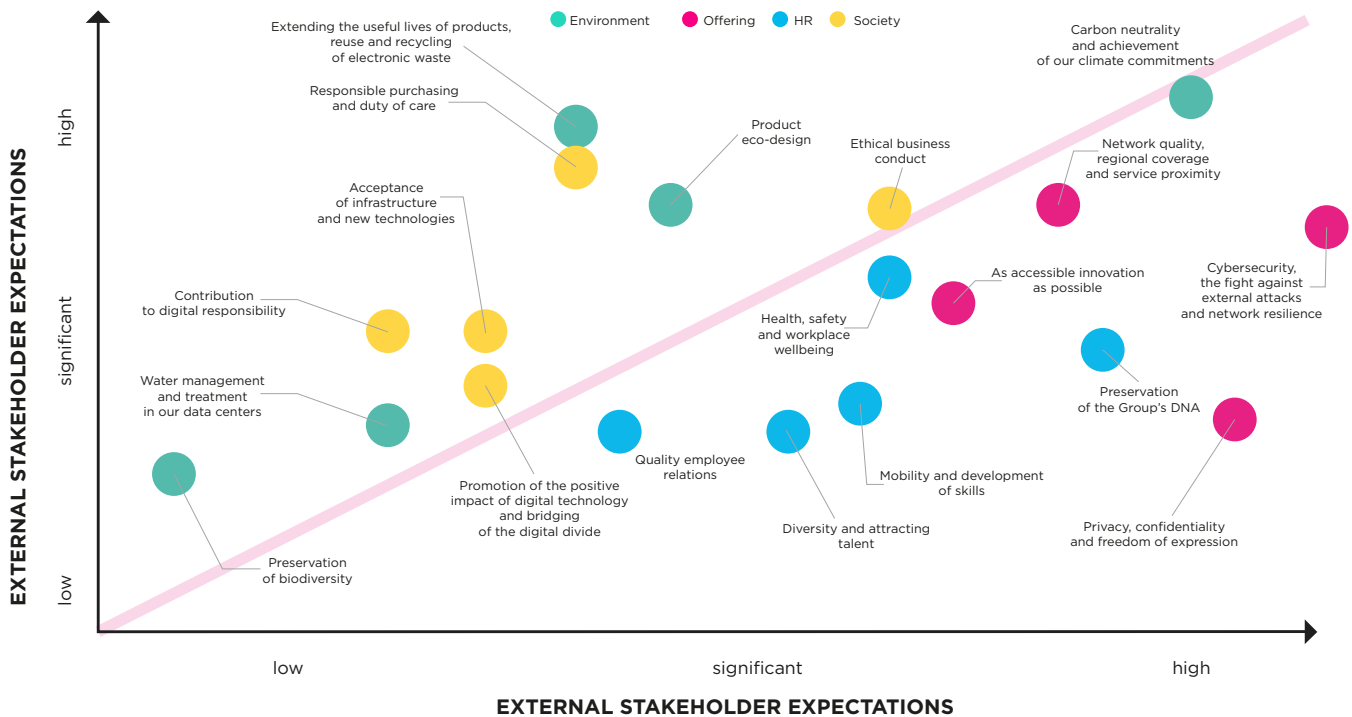
The materiality analysis is based on the following classification:

Consensus priority challenges	Limited priority challenges
• Carbon neutrality and achievement of our climate commitments • Ethics in business conduct and commercial practices • Cybersecurity, the fight against external attacks and network resilience • Network quality, regional coverage and service proximity • Health, safety and workplace wellbeing	• Acceptability of infrastructure and new technologies • Contribution to responsible digital technology • Quality social dialog • Water management and treatment in our data centers • Promotion of the positive impact of digital technology and bridging of the digital divide • Biodiversity preservation

Priority challenges for external stakeholders	Priority challenges in terms of their impact on the Group's activities
• Product eco-design • Product life extension, reuse and recycling of electronic waste • Responsible purchasing and duty of care	• Innovation accessible to as many people as possible • Privacy, confidentiality and freedom of expression • Preservation of the Group's DNA • Mobility and skills development • Diversity and attraction of talent

The risks and opportunities presented in our risk map below, as well as risk mitigation, are drawn from this materiality analysis. The findings of the materiality analysis are based on articles, position papers and reports such as the Global Risks Report (published by the World Economic Forum at the start of each year). They have been supplemented by an industry ESG benchmark study based on the rating agencies most widely used by investors (S&P CSA, MSCI, Sustainalytics, Moody's) and the Carbon Disclosure Project (CDP) for climate change issues. Given the nature of the Group's activities, our CSR commitments do not include (as they are not material) measures related to the promotion of physical and sporting activities, the prevention of food waste or food insecurity, animal welfare, and responsible, fair and sustainable food.

4.1.4.2.1 Environmental priorities

The materiality analysis highlights three environmental priorities:

○ carbon neutrality and achievement of our climate commitments;

○ product eco-design;

○ product life extension, reuse and recycling of electronic waste.

Based on these three priorities, we have identified three risks to our business model. The issues of biodiversity preservation and water management and treatment in our data centers will be the subject of more in-depth analysis in 2023 and have not yet been associated with a risk to our business model.

Priorities identified	Risks	Policies and actions implemented
Carbon neutrality and achievement of our climate commitments	**Failure to meet our environmental objectives** The risk of not meeting our environmental objectives could impact the brand's reputation and the Group's financing conditions. Without the rollout of adaptation solutions, unchecked climate change could also impact the course of our business.	Sections 4.2.1, 4.2.2, 4.2.3 and 4.2.4 concern the need to increase the share of renewables in our energy mix, our strategy for optimizing the consumption of our fixed and mobile networks, for optimizing our mobility solutions for our employees and for controlling the environmental impacts of our supply chain.
Product eco-design		Section 4.2.5 concerns the measures taken to limit the carbon footprint resulting from the manufacture of Freeboxes (and any other Internet and/or IPTV boxes); and which the Group influences directly and indirectly through the purchase and use of smartphones.
Product life extension, reuse and recycling of electronic waste		

4.1.4.2.2 Human resources priorities

The materiality analysis highlights four human resources priorities:

- health, safety and workplace wellbeing;
- preservation of the Group's DNA;
- mobility and skills development;
- diversity and attraction of talent.

Although the materiality analysis does not consider this to be a priority, we believe that maintaining quality social dialog is essential and have accordingly integrated it into the risk map. Based on these five social priorities, we have identified five risks.

Priorities identified	Risks	Policies and actions implemented
Diversity and attraction of talent	Risks related to discrimination, failure to ensure equal opportunities and difficulties in continuing to recruit	Section 4.3.1 concerns the risk for iliad of failure to take action to promote and foster employee diversity, equal treatment and inclusion, potentially compromising the maintenance of a robust employer brand and the capacity to continue attracting talent.
Mobility and skills development	Risks related to the loss of key skills	Section 4.3.2 concerns the means implemented by the Group to provide adequate training for its teams in current and future business areas in order to continue to be able to meet the needs of iliad's customers and adapt to market developments (notably nationwide fiber coverage).
Health, safety and workplace wellbeing	Risks related to our employees' working conditions	Section 4.3.3 concerns the need for the Group to put in place policies and monitoring mechanisms to guarantee the health and safety of all employees and facilitate their working lives, particularly in terms of equipment for technicians. It also concerns the Group's ability to provide a pleasant working environment that promotes the wellbeing of its people (e.g., work/life balance).
Quality social dialog Preservation of the Group's DNA	Risks related to the loss of key skills and the deterioration of the brand image	Section 4.3.4 concerns the risk of not creating the conditions required for effective dialog with all stakeholders, as a deterioration in such dialog could impact the quality of network maintenance, customer service and therefore customer satisfaction.

4.1.4.2.3 Social priorities

The materiality analysis highlights two social priorities:

- ethics in business conduct and commercial practices;
- responsible purchasing and duty of care.

The materiality analysis deprioritizes three social issues:

- acceptability of infrastructure and new technologies;
- contribution to responsible digital technology;
- promotion of the positive impact of digital technology and bridging of the digital divide.

Although the materiality analysis does not consider this to be a priority, we believe that our contribution to responsible digital technology is essential and have accordingly integrated it into the risk map. Promoting the positive impact of digital technology and bridging the digital divide appears to us to be very similar to the challenges of making innovation accessible to as many people as possible and ensuring network quality, regional coverage and service proximity, which are priorities relating to our offer and are addressed together in the next section.

Priorities identified	Risks	Policies and actions implemented
Responsible purchasing and duty of care	Risks of non-compliance with respect to business ethics	Section 4.4.1 concerns the implementation by the iliad Group of an organizational structure enabling traceability of the Group's products and business activities, including the origin of a product and its components and production, storage and distribution conditions, in order to know and control all upstream suppliers, mainly raw materials suppliers. This section also concerns taking into consideration the Group's duty of care obligations and the requirement for fair value distribution in the supply chain (such as social progress, respect for human rights and economic development).
Ethics in business conduct and commercial practices	Risks of non-compliance with respect to business ethics	Section 4.4.2 concerns the internal framework of standards and specific operating procedures implemented to avoid ethical and corruption risks within the Group's subsidiaries in France, Italy and Poland.
Contribution to responsible digital technology	Risks related to the psychological impact of certain content on children and the hosting of illegal content	Section 4.4.3.2 concerns the measures implemented to minimize the risks of younger users being exposed to the dangers of the digital world and to regulate content hosting. See also the section 1.6.2 which concerns the legal framework governing the obligations of hosting providers.
Promotion of the positive impact of digital technology and bridging of the digital divide	Risks associated with the absence of access to essential digital services	See sections 4.4.3.3 and 4.4.3.4.

4.1.4.2.4 Priorities regarding the offering

The materiality analysis highlights four priorities with respect to the Group's offering:

- cybersecurity, the fight against external attacks and network resilience.

- innovation accessible to as many people as possible;
- privacy, confidentiality and freedom of expression;
- network quality, regional coverage and service proximity.

Based on these four priorities, we have identified four main risks to our business model.

Priorities identified	Risks	Policies and actions implemented
Innovation accessible to as many people as possible Network quality, regional coverage and service proximity	Risks related to the digital divide	Section 4.4.3.3 concerns the Group's strategy of offering its services to as many people as possible through a proactive policy of investment in infrastructure, and by offering the same prices throughout the country in the interests of equality. It also concerns the initiatives carried out by the Free Foundation to contribute to the fight against the digital divide.
Cybersecurity, the fight against external attacks and network resilience Privacy, confidentiality and freedom of expression	Risks related to protecting users' personal data	Sections 4.4.3.1 and 4.4.3.2 concern the measures implemented by the iliad Group to ensure the proper management and protection of its subscribers' personal data as well as the iliad Group's determination to ensure the protection, confidentiality and security of the personal data of the users of its services.
Cybersecurity, the fight against external attacks and network resilience	Risks related to the cybersecurity of information systems and service disruptions	Section 4.4.3.1 concerns the initiatives taken by the Group to reduce the potential for cybercriminal attacks, with the risk of fraud, business interruption, intrusion, loss or disclosure of confidential information, etc.

4.2 BUILDING AN ENVIRONMENTALLY RESPONSIBLE DIGITAL WORLD

This chapter is an integral part of the management report, in accordance with Articles L. 225-102-1, R. 225-105 and R. 225-105-1 of the French Commercial Code on transparency requirements for companies. The Group takes a continuous improvement approach to disclosing its CSR data and information related to human rights, based on a map of its specific risks and opportunities and an internal reporting process.

The digital revolution[1] – in which iliad is playing a key role – is expected to lead to a sharp increase in digital usages in all sectors of the economy and society in the mid-term. iliad operates in France, Poland and Italy. In 2020, these three countries accounted for 35%[2] of the European Union's greenhouse gas emissions and 37%[3] of its population. iliad's operations are therefore extensive in Europe and their development cannot disregard the climate emergency. In 2019, digital technology accounted for 4% of global greenhouse gas (GHG) emissions and 2% of national emissions[4] in France. While the use of telecom networks currently represents only a small part of the digital carbon footprint, its rapid growth means that the Group must play its part in achieving carbon neutrality as quickly as possible. According to a joint Ademe-ARCEP report published on March 6, 2023 on the environmental impact of digital technology in 2030 and 2050, the carbon footprint of digital technology in France could increase by 45% (tripling between 2020 and 2050) in the absence of efforts to control it between 2020 and 2030.

In addition to climate change, other environmental impacts of digital technology are emerging today, such as ionizing radiation, waste production and abiotic resource depletion (minerals and metals), mainly caused by devices (65%-92%), data centers (4%-20%) and networks (4%-13%)[5]. These figures show how the Group needs to work towards reducing the environmental impact of its activities.

Our three focuses for reducing our environmental footprint are:

- meeting our 10 climate pledges as quickly as possible;
- improving our energy efficiency; and
- minimizing the impact of our products based on an eco-design approach.

— **INTERNAL FRAMEWORK/TCFD**

At the end of 2022, the CSR Steering Committee embarked on analysis to assess the level of alignment of the measures implemented for climate with the TCFD (Task Force on Climate-related Financial Disclosures). Within this process, and with a view to ultimately joining the initiative, the iliad Group has prepared an alignment matrix listing the Group's current responses to the TCFD recommendations (see below).

Governance	Reference in the URD	Strategy	Reference in the URD	Risk management	Reference in the URD	Metrics and targets	Reference in the URD
Board of Directors oversight of climate risks and opportunities	Sections 3.2 and 4.1.4.1	Analysis of risks and opportunities over the short, medium, and long term	Analysis process under development	Process for identifying and assessing risks and opportunities	Section 4.1.4.2	Metrics and targets used to assess risks and opportunities	Assessment process under development
Assessment and management of these risks and opportunities by the Executive Committee	Sections 3.3 and 4.1.4.1	Analysis of impacts on the strategy, business model and financial planning	Analysis process under development	Risk management process	Section 4.1.4.2	Emissions in Scopes 1, 2 and 3 if appropriate	Section 4.2.1.3
		Analysis of the company's financial resilience under different climate scenarios	Analysis process under development	Integration of these processes into overall risk management	Section 4.1.4.2	Progress against targets	Section 4.2.1.3

(1) Digital technology refers to a combination of infrastructure (telecom networks, Datacenters), hardware (telephones, computers, Internet boxes) and services (content, applications, software, etc.).

(2) EEA Dashboard.

(3) Eurostat.

(4) Report by the French Senate aimed at encouraging an ecological digital transition, 2019-2020.
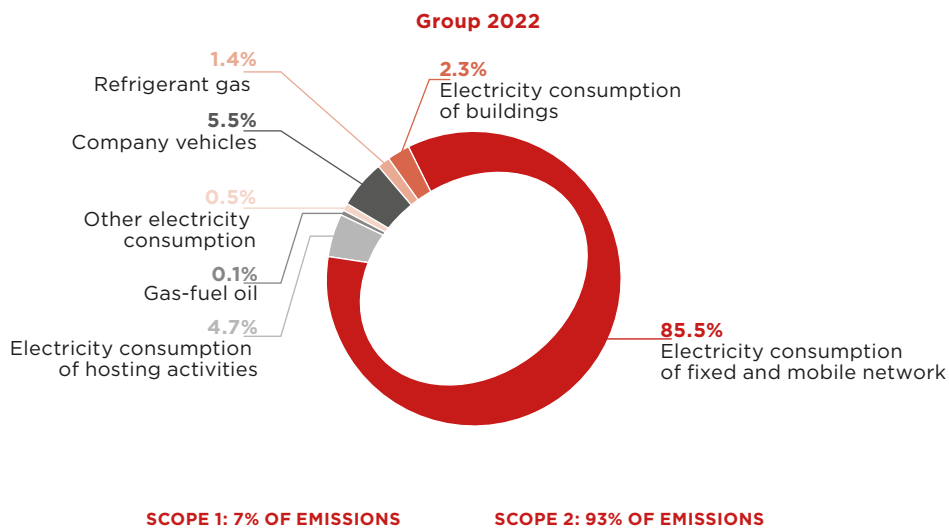
(5) Report by Ademe and ARCEP on the environmental footprint of digital technology in France, January 19, 2022.

4.2.1 Carbon neutrality and achievement of our climate commitments: improving our sourcing

Doing the right thing for future generations and achieving carbon neutrality as quickly as possible means making serious choices. We want to reduce our impact on the environment as much as possible and help others to do the same thing, so that together we can create a better future. In view of the environmental challenges the world is currently facing, we are determined to take our commitment to the next level in order to rapidly contribute to worldwide carbon neutrality.

Telecom networks account for the bulk of the iliad Group's electricity consumption. Players across the entire sector see overall electricity consumption for this item increasing, on the back of mounting traffic growth. Since the launch of our climate strategy, we have nevertheless been making every effort to optimize the energy efficiency of our networks, taking whatever actions we can. In our energy saving plan published on October 6, 2022, the Group makes commitments in two areas: further intensify our energy efficiency measures, and practice load shedding in our data centers in the event of major spikes in consumption.

— **GROUP CO$_2$EQ EMISSIONS (INCLUDING UPC POLSKA OVER 12 MONTHS IN 2022)**

— **% OF SCOPE 1 & 2 EMISSIONS**

Group 2022

1.4% Refrigerant gas

5.5% Company vehicles

0.5% Other electricity consumption

0.1% Gas-fuel oil

4.7% Electricity consumption of hosting activities

2.3% Electricity consumption of buildings

85.5% Electricity consumption of fixed and mobile network

SCOPE 1: 7% OF EMISSIONS   **SCOPE 2: 93% OF EMISSIONS**

4.2.1.1 Policies and objectives

Setting science-based targets is an integral part of iliad's climate roadmap. The Science Based Targets Initiative* (SBTi) has become the standard for companies to set credible targets to address the climate crisis. iliad has pledged to submit its targets by the end of June 2023. By undertaking to set these targets aimed at limiting global warming to 1.5°C, iliad has committed to (i) stepping up its current climate pledges and to aligning its Scope 1 and 2 emissions, and the Scope 3 emissions that apply to it, with a 1.5°C and net zero pathway, and (ii) reinforcing its short- and mid-term objectives.

We want to get it right and we want to do it quickly. Our targets are ambitious and break down into three stages to achieve carbon neutrality in France and Italy. In 2021, 100% of our direct electricity supply in both countries was from renewable sources;

this target was achieved in Poland in 2022. Our aim is to achieve zero net carbon emissions in France and Italy for energy consumption associated with the assets we own or operate by 2035, 15 years ahead of the Paris Agreement objective. This target was set in 2021 and as such excludes Poland, which was not in the initial scope of our targets and which has a high proportion of fossil fuels in the national energy mix. However, we are now looking into the feasibility of including Poland with the same timeframe. By 2050, we are aiming for net zero for the Group's main indirect emissions.

iliad is growing at a rapid pace and thanks to its acquisitions, it is positioning itself as a catalyst for the climate transition by transferring its low-carbon know-how to the companies it acquires. This means that our climate pledges are not hampering our growth strategy – quite the opposite in fact.

In Poland, the activities of Play and the recently consolidated UPC Polska were integrated in just two years and the reporting scope for carbon footprint data now covers the whole Group. The SBTi trajectory, which will be submitted for validation in the first half of 2023, will therefore cover the entire end-2022 climate scope, with SBTi trajectories adapted country by country.

The ten climate pledges we made in 2021 are as follows:

No. 1 – Invest €1 billion over 15 years

No. 2 – Improve the energy efficiency of our Fixed and Mobile networks

No. 3 – Ensure our Datacenters have advanced environmental performance

No. 4 – Further enhance the environmental performance of our Freeboxes

No. 5 – Deploy an environmentally friendly sales strategy

No. 6 – Deploy a responsible procurement policy

No. 7 – Reduce emissions generated by our fleet of 4,200 vehicles

No. 8 – Help create more renewable energy capacity

No. 9 – Invest in carbon sinks

No. 10 – Set up a climate performance tracking system

4.2.1.2 Actions implemented

4.2.1.2.1 Increasing our clean energy purchases

It is our duty to make a decisive contribution to achieving global carbon neutrality, as defined by the Paris Agreement. Since 2017, the Group has chosen to optimize the carbon footprint of its data centers by powering them entirely with renewable energy. To focus investment on the projects with the greatest impact, iliad can enter into contracts directly with project developers to physically deliver the power to the areas and electricity grids where the Group operates via direct energy purchase agreements and PPAs going forward.

Since 2021, 100% of the electricity used by the Group in France and Italy comes from renewable sources[1], covered by guarantee of origin certificates. For Play, in Poland, this proportion was 50% in 2021 and 100% in 2022[1].

Regarding our direct supply, our objective is to source at least 50% of our energy through PPAs by 2035 in Italy, where the electricity mix is eight times more carbon-intensive than in France. In France, where the energy mix is already low-carbon, we are aiming for 20% sourcing from PPAs by 2035. Given the high carbon intensity of electricity in Poland, we are also exploring the feasibility of using PPAs in that country, with a minimum coverage objective of 50%.

The Group's first PPA was announced in February 2023. In France, the iliad Group and Engie have signed a 15-year contract covering a solar farm that will produce more than 20 GWh of electricity per year, i.e., roughly 5% of the Group's direct consumption in France in 2022. The Group is endeavoring to conclude further PPAs with trusted partners such as Engie, particularly in Italy and Poland, where the energy mix is more carbon-intensive.

4.2.1.2.2 Participating in the low-carbon transition thanks to the positive impacts of digital technology – focus on passenger transport

Assessing the direct environmental impacts of digital technology, and notably the sector's greenhouse gas emissions, also provides an opportunity to look at the positive effects of digitalization on the ecological transition process, and in particular the emissions avoided thanks to the low-carbon transition. One example of the emissions reductions made possible by iliad's services is the way that remote working is made easier by the use of digital solutions – especially video calls – which help both our customers and our employees lower their CO_2eq emissions by avoiding the need to commute to get to work. Where it is necessary, travel is facilitated by the use of GPS services such as Waze or Google Maps, which allow our private and professional subscribers to optimize travel times and avoid busy roads where vehicle engines are often left idling. The frequent use of these geolocation services has even prompted French lawmakers to require digital players to promote less carbon-intensive alternatives to cars: decree No. 2022-1119 of August 3, 2022 on digital travel assistance services published in the *Official Journal of the French Republic* No. 1080 of August 5, 2022 "aims both to support the transition of uses towards low-carbon mobility, notably by leveraging digital travel assistance services, and to regulate the negative externalities of the use of such digital services". In addition to awareness-raising messages, the result of a journey planning request – whatever the mode of transport – must give rise to a display of the pollution generated (CO_2eq emissions, PM10 particles, nitrogen oxide, etc.). The challenge is to keep things as simple as possible for users by delivering optimally timed information, with the quality and availability of the Free Mobile network contributing to reducing the carbon intensity of everyday mobility.

Carpooling is an illustration of the positive impacts of digital technology and mobile telephony on the reduction of GHG emissions. By optimizing the load factors of private vehicles via the connection made possible by a smartphone and a mobile subscription, carpooling allows a genuine saving in terms of CO_2eq. Analysis of 2021 and 2022 statistics for France points to a substantial increase in carpooling thanks to digital platforms and a definite saving in tonnes of CO_2eq.

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(1) On consumption billed directly.

	2021	2022	Change
Average number of passengers transported per month	128,443	422,870	+229%
Average number of vehicles pooled per month	95,440	322,466	+238%
Total tonnes of CO_2 saved	7,009	24,341	+247%

Source: National Daily Carpooling Observatory (France).

Another example of potential savings offered by the digital economy is the optimization of public transport: the transmission of meteorological information to public transport companies (the iliad Group being a B2B connectivity and cloud services operator and responding to public tenders) will ultimately make it possible to optimize the volume of buses and trams operating by establishing correlations between the weather and the number of tickets validated.

4.2.1.2.3 Actively participating in the development of carbon sinks

Increasing the quantity of carbon sinks

We are committed to contributing to global carbon neutrality by increasing the quantity of carbon sinks in France, Italy and Poland in proportion to our total emissions. We have set ourselves the target of obtaining environmental certification or labels for most of our projects by 2035. Our reference framework in France is the government's National Low Carbon Strategy and its specific Low Carbon label for projects developed in France.

Four initial projects were launched in 2021 in France. These certified projects will enable the capture of 22,500 tonnes of CO_2 in France with more than 80,000 trees planted covering a total area of 76 hectares. The projects were selected because they bring combined benefits in terms of local employment and preserving land and biodiversity. New projects are under consideration in France. Obviously, investments of this nature must be seen in a long-term perspective, as carbon storage by trees is only fully mature 50 to 100 years after their planting, depending on the species, which is why it is important to act quickly.

Internal carbon price (ICP)

In line with our Climate Plan, we created an internal carbon pricing mechanism in 2021, with the price set at €50 per tonne of CO_2, which corresponds to the minimum price to be used to guide our decision-making. It was also the average price in 2021 in France's voluntary carbon offset market (Low Carbon label), so it will help us monitor the costs that we avoid by reducing carbon emissions instead of offsetting them. The role of this theoretical carbon price is to help us move our investments towards low-emission products and processes.

Given the surge in energy prices in 2022 following the outbreak of the war in Ukraine, the volatility of prices and the risks weighing on supply, particularly the question of load shedding, there are plans to overhaul the mechanism in 2023 so as to take the new energy environment into account.

4.2.1.3 Emissions results and indicators in 2022

Since 2018, iliad has gone from being an exclusively French consumer telecom group to being a European-scale telecom group covering both the residential and business markets via connectivity offers and cloud services. This has led to:

- Continuous growth in our subscriber base, which now totals 46 million subscribers in our three host countries.

- An acceleration in our network rollouts, particularly with regard to our regulatory obligations.

- The ramp-up of new businesses such as Cloud solutions and B2B telecoms services.

The Group intends to pursue its growth strategy while controlling its direct and indirect CO_2 emissions in the short term (with a slower increase than the Group's pace of growth) and subsequently to reduce these emissions in the mid and long term, with the target of becoming carbon neutral by 2035.

In 2022, Poland joined France and Italy in achieving our target of only using renewable electricity (for direct consumption). These actions are an extension of the efforts we have been making for many years now. For example, we eliminated air freight from our transport mix a while ago (only using it in exceptional circumstances as a result of the pandemic or geostrategic events such as the war in Ukraine, which has disrupted rail traffic between Asia and Europe since the outbreak of the conflict), and we now use sea, river and rail transport instead. Furthermore, we have always paid particular attention to the environmental performance of the boxes made available to our subscribers, in terms of both their components and their electricity consumption.

The following table shows the Group's annual carbon footprint using the market-based and location-based emissions accounting methods defined in the GHG Protocol Scope 2 Guidance. Location-based data is calculated by reference to the emissions intensity of grids in the locations where energy consumption occurs The market-based method reflects emissions from electricity that the Group has purposefully chosen in all of its geographies via contractual instruments such as renewable energy certificates (RECs).

— FRANCE + ITALY + POLAND GROUP – ANNUAL CARBON FOOTPRINT

Group

tCO_2eq	2020 (with Play over 12 months)	2021	2021 restated (with UPC Polska over 12 months)	2022 (with UPC Polska over 12 months)	% change year-on-year
Scope 1	19,038	20,610	22,615	24,093	7%
Scope 2 (Location based)	193,119	221,967	270,407	320,392	18%
Scope 2 (Market based)	202,945	123,928	190,406	149,826	-21%
Total 1 + 2 (Location based)	**212,157**	**242,577**	**293,023**	**344,485**	**18%**
Total 1 + 2 (Market based)	**221,982**	**144,538**	**213,021**	**173,919**	**-18%**
Significant Scope 3 emissions[1]	630,785	651,091	877,766	909,634	4%
Other Scope 3 emissions (Location based)	145,752	162,312	101,431	116,688	15%
Other Scope 3 emissions (Market based)	144,497	150,699	76,040	77,122	1%
Scope 3 (Location based)	**776,537**	**813,404**	**979,197**	**1,026,323**	**5%**
Scope 3 (Market based)	**775,282**	**801,790**	**953,806**	**986,756**	**3%**

France

tCO_2eq	2020	2021	2021 restated	2022	% change year-on-year
Scope 1	15,851	17,441	19,047	18,642	-2%
Scope 2 (Location based)	35,389	38,786	37,124	37,529	1%
Scope 2 (Market based)	25,767	20,480	18,094	16,189	-11%
Total 1 + 2 (Location based)	**51,240**	**56,228**	**56,171**	**56,171**	**0%**
Total 1 + 2 (Market based)	**41,618**	**37,922**	**37,141**	**34,831**	**-6%**
Significant Scope 3 emissions	303,518	350,070	368,921	368,105	0%
Other Scope 3 emissions (Location based)	22,799	62,053	39,762	43,513	9%
Other Scope 3 emissions (Market based)	21,544	65,556	43,695	39,663	-9%
Scope 3 (Location based)	**326,317**	**412,123**	**408,683**	**411,618**	**1%**
Scope 3 (Market based)	**325,062**	**415,626**	**412,616**	**407,768**	**-1%**

Italy

tCO_2eq	2020	2021	2021 restated	2022	% change year-on-year
Scope 1	618	961	961	1,711	78%
Scope 2 (Location based)	29,180	33,423	58,677	76,701	31%
Scope 2 (Market based)[2]	22,470	0	38,950	43,381	11%
Total 1 + 2 (Location based)	**29,798**	**34,384**	**59,638**	**78,412**	**31%**
Total 1 + 2 (Market based)	**23,088**	**961**	**39,911**	**45,092**	**13%**
Significant Scope 3 emissions	96,524	73,804	113,195	123,884	9%
Other Scope 3 emissions (Location based)	78,406	50,423	19,175	24,697	29%
Other Scope 3 emissions (Market based)	78,406	45,934	14,591	12,722	-13%
Scope 3 (Location based)	**174,930**	**124,227**	**132,370**	**148,580**	**12%**
Scope 3 (Market based)	**174,930**	**119,738**	**127,786**	**136,605**	**7%**

(1) *Subscriber box and mobile equipment and consumption, new active fixed and mobile network equipment and their maintenance, roaming, purchases of services.*

(2) *The market-based Scope 2 figures for Italy for 2021 do not include indirect consumption (mainly mobile sites owned by third parties).*

Poland

tCO$_2$eq	2020	2021	2021 restated and pro forma UPC Polska	2022	% change year-on-year
Scope 1	2,569	2,208	2,607	3,740	43%
Scope 2 (Location based)	128,550	149,757	174,606	206,162	18%
Scope 2 (Market based)	154,708	103,447	133,362	90,257	-32%
Total 1 + 2 (Location based)	**131,119**	**151,965**	**177,213**	**209,902**	**18%**
Total 1 + 2 (Market based)	**157,277**	**105,655**	**135,970**	**93,997**	**-31%**
Significant Scope 3 emissions	230,743	227,218	395,649	417,646	6%
Other Scope 3 emissions (Location based)	44,547	49,836	42,494	48,479	14%
Other Scope 3 emissions (Market based)	44,547	39,208	17,755	24,737	39%
Scope 3 (Location based)	**275,290**	**277,054**	**438,143**	**466,125**	**6%**
Scope 3 (Market based)	**275,290**	**266,427**	**413,404**	**442,383**	**7%**

In this table, the restated 2021 data differ from the reported figures, primarily for the following reasons:

- consolidation of UPC Polska over 12 months in 2021 (12 months also in 2022) so as to present full-year pro forma figures;
- on Scope 1: some adjustments in France, particularly relating to refrigerant gases;
- on Scope 2: we have applied new, more precise calculation methodology for indirect[1] electricity consumption;
- on Scope 3: we have applied new, more precise calculation methodology for purchases of goods and services, in particular international roaming, fiber maintenance, optical fiber production, construction of new mobile sites, new servers, purchases of IT equipment and transport services (reliability and update of emission factors for upstream freight data and employee travel), and updated the calculation of the consumption of equipment depending on whether it belongs to the Group or was sold to subscribers and companies.

On a restated pro forma basis for UPC Polska over 12 months, the Group's Scope 1 and 2 (market-based) emissions are down 18%. Significant Scope 3 emission sources (subscriber box and mobile equipment and consumption, active fixed and mobile network equipment, roaming), which accounted for 90% of Scope 3 emissions in 2022, increased by just 4% despite an increase in data consumption and the growth of the subscriber base, and by 3% overall (location-based). This increase notably reflects the principle of "capitalizing" GHG emissions, attributed in a given year when network infrastructure and data centers (servers) are deployed.

4.2.2 Carbon neutrality and achievement of our climate commitments: sustainably improving our energy efficiency

4.2.2.1 Improving the energy efficiency of our networks and use of natural resources

At a time of strong growth in usage and rollouts, energy consumption related to the Group's activities increased in 2022 (at constant scope), notably with the continued rollout of networks in our three geographies (4G and 5G for mobile, FTTH in France and Italy and HFC and FTTx in Poland) and the development of our data center activity (Public Cloud offer by Scaleway Elements and Business offers by Free Pro), which use cooling systems to ensure optimal quality of service.

4.2.2.2 Policies and objectives

Networks account for 85% of the Group's direct CO$_2$ emissions (Scopes 1 and 2, location-based) and are therefore a top priority for iliad.

These emissions relate to:

- electricity consumption, which accounts for almost all of the networks' CO$_2$ emissions;
- the use of refrigerant gas to cool infrastructure for the core network and data hosting servers;
- consumption of fuel oil (in very small quantities) to power electricity generators in the event of electricity outages in the above-mentioned infrastructure (periodic tests of correct operation).

In addition to its energy footprint, the digital industry's environmental responsibility involves the energy supply and intrinsic energy efficiency of data centers, as well as water management. Making the right ethical, regulatory and

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(1) *Direct electricity is electricity consumption billed directly, for which iliad is bound by a contract with a supplier. Indirect electricity is electricity consumption billed to iliad by a third party, itself bound by a contract to a supplier for that electricity consumption.*

technological choices is the only way to stop the benefits of the world's digitalization from being wiped out by damaging ecological impacts.

Network electricity consumption was 1,508 GWh in 2022, an increase of 176 GWh year on year (on an adjusted pro forma 2021 basis). The increase is split fairly evenly between the three geographies (increases of 68 GWh for Italy, 62 GWh for France and 51 GWh for Poland).

— GROUP ELECTRICITY CONSUMPTION

GWh	2019	2020	2021[1]	2021 restated (with UPC Polska over 12 months)	2022 (with UPC Polska over 12 months)
Building consumption	11 GWh	18 GWh	20 GWh	20 GWh	23 GWh
Network consumption	808 GWh	1,139 GWh	1,240 GWh	1,333 GWh	1,508 GWh
Core network	*30 GWh*	*31 GWh*	*29 GWh*	*87 GWh*	*76 GWh*
Datacenters	*121 GWh*	*157 GWh*	*163 GWh*	*148 GWh*	*142 GWh*
ADSL network	*270 GWh*	*241 GWh*	*190 GWh*	*143 GWh*	*120 GWh*
FTTH network (HFC/FTTx in Poland)	*27 GWh*	*28 GWh*	*69 GWh*	*70 GWh*	*79 GWh*
Mobile network	*360 GWh*	*682 GWh*	*790 GWh*	*885 GWh*	*1,091 GWh*
Vehicle electricity	0 GWh	0 GWh	0 GWh	0 GWh	0 GWh
Heating/cooling network	5 GWh	6 GWh	6 GWh	6 GWh	9 GWh
TOTAL	**824 GWH**	**1,163 GWH**	**1,266 GWH**	**1,359 GWH**	**1,540 GWH**
Total excluding heating/cooling network	0	1,157 GWh	1,260 GWh	1,353 GWh	1,532 GWh
Consumption France	799 GWh	863 GWh	903 GWh	861 GWh	924 GWh
Consumption Italy	26 GWh	97 GWh	126 GWh	221 GWh	289 GWh
Consumption Poland		204 GWh	237 GWh	277 GWh	328 GWh

(1)   Reported figures for 2021 do not include indirect consumption in Italy (mainly mobile sites owned by third parties).

The Group's activities (Fixed and Mobile electronic communications) require the deployment of infrastructure that is relatively energy hungry. However, the rollout of 5G technology should lead to significant energy savings by 2028 for mobile networks. Following a temporary transition period from a 4G network to a 4G/5G network, we should see savings of up to ten times the energy consumption in 2020[1]. For several years now, the Group has been participating in this transition by

purchasing the latest generation energy-efficient equipment for its networks. Two eco-efficient technologies are being deployed, with subscribers gradually being migrated to fiber and 5G.

As part of its Climate Strategy, in 2021 the Group pledged to make network energy efficiency a priority. This pledge is reflected in our work to help subscribers gradually move to fiber and 5G, as well as in our stated objective of having data centers with advanced environmental performance, which we will achieve notably thanks to the widespread use of a new cooling process based on the adiabatic principle.

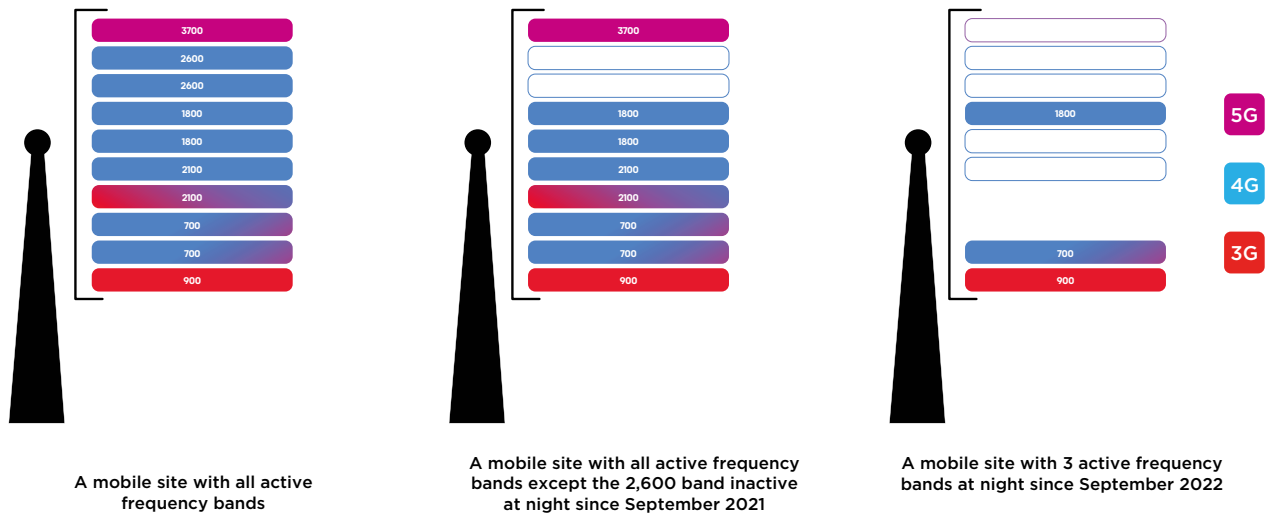### 4.2.2.2.1 Actions implemented

Reducing the energy consumption of our fixed and mobile networks

In line with our objective of making our fixed and mobile networks more energy efficient, we are constantly on the lookout for the least energy-hungry equipment. We have also launched a program with our electricity and equipment suppliers to optimize the management of electricity consumption.

In France, the radioelectric equipment installed by Free Mobile is new generation, which is up to five times smaller and lighter than previous generations and consumes 30% less energy. This has enabled us to keep the increase in our mobile network's energy consumption at contained levels, despite the strong growth in our mobile business and the growing use of 4G, and more recently 5G. This is just one of the ways we are taking steps to optimize our equipment, because even if it's renewable, the best type of energy is energy that's not used at all. In September 2021, we accordingly rolled out a standby mode for 2,600 MHz frequency at night in order to reduce the energy consumption of Free's mobile network in France. We have now gone even

further: since the end of 2022, we have also been switching off 2,100 MHz 3G/4G frequency and 3.5 GHz 5G frequency at night. This helps reduce the site's electricity consumption by more than 10% during the period when the cells are switched off, without impacting usage or quality of service (for sites where all frequencies are available during the day). If the volume of traffic requires it, the cells automatically come back on to maintain optimal quality of service.

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(1)   ARCEP, Energy consumption of mobile networks, Comparative study on the evaluation of energy consumption of a 4G vs 5G rollout, January 14, 2022.

A mobile site with all active
frequency bands

A mobile site with all active frequency
bands except the 2,600 band inactive
at night since September 2021

A mobile site with 3 active frequency
bands at night since September 2022

We are also reducing the number of simultaneous transmitters in the same frequency band (MIMO reduction) for those that remain operational at night, which allows us to cut the amplifiers on the bands in question. We are obviously continuing to roll out 5G, which will make it possible to achieve better control of energy consumption despite the increase in usage over time.

Lastly, in line with our climate pledges, environmental criteria are now a decisive factor in our partner selection process. We are already in discussions with several of our suppliers to find ways of reducing the electricity consumption of our network equipment. A work group on this topic has been set up with Nokia, our leading supplier of Mobile network equipment.

For fixed networks, the Group is committed to continuing and further accelerating our policy of rolling out optical fiber and migrating to it. An FTTH line consumes just over a quarter of the power required by an ADSL line (0.5 watts vs. 1.8 watts per line). Over the last 12 months, we have rolled out 5.8 million new fiber connections. The Group systematically encourages every eligible subscriber to migrate to a fiber connection at no extra cost; 65% of our subscriber base had taken up this technology at the end of 2022. The iliad Group is the most active operator on this issue in France, and boasts the highest Fiber take-up rate of all operators. We are also working to optimize the equipment in place as we decommission ADSL networks, notably by disconnecting and miniaturizing DSLAMs. We plan to step up the pace of this process in the coming months so as to increase energy savings. The Group also advocates the accelerated decommissioning of the copper network and recommends a gradual technical shutdown in the very near term.

Optimizing data center energy consumption and improving efficiency and use of natural resources

In line with the third pledge of our Climate Plan, we constantly strive to improve the energy consumption of our data centers, in accordance with the EU Code of Conduct on Data Centre Energy Efficiency, which the Group signed up to in 2012. In addition, staff at our hosting subsidiaries are educated about environmental issues and take measures to optimize and reduce energy consumption.

Scaleway, which accounts for the bulk of the Group's data center power consumption, has set an ambitious PUE (Power Usage Effectiveness) target of <1.15 for all new data centers built after 2018, and <1.3 for all previously built data centers. This entails the continuous improvement of cooling systems (e.g., natural cooling using outside air) and the modernization of primary infrastructure through the use of energy efficient equipment. Scaleway aims to go beyond this indicator and to adopt WUE (Water Usage Effectiveness), which measures the services' ratio of cooling system water consumption (in liters) to electricity consumption (in kWh). Our current PUE targets represent an average incremental efficiency gain of up to 30% over the weighted industry average of 1.55[1].

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(1)   Uptime Institute's 2022 Global Data Center Survey (https://uptimeinstitute.com/about-ui/press-releases/2022-global-data-center-survey-reveals-strong-industry-growth).

We believe firmly in the relevance of the WUE indicator. Fresh water is abundant in France, "however, most water withdrawals take place in summer, when the availability of the resource is at its lowest, which can result in significant local strain on this resource, as well as temporary shortages"[1]. This analysis is backed up by the European Environment Agency: "Similar to many regions in the rest of the world, worries over water stress and scarcity are increasing in Europe too, amid an increased risk of droughts due to climate change. (…) Water demand across Europe has steadily increased over the past 50 years, partly due to population growth. This has led to an overall decrease in renewable water resources per capita by 24% across Europe. (…) energy production also uses a lot of water, accounting for around 28% of annual water use." [2]

Ensuring transparent energy management for our data centers through certification

In parallel with implementing the innovative environmental measures described above, we have also obtained various certifications for our data centers. For instance, Online-Scaleway's data center operations are ISO 50001 certified, attesting to the quality of their energy management system. Certification was successfully renewed in 2021, attesting to the effectiveness of the continuous improvement initiatives implemented. The measures adopted to achieve energy efficiency and minimize energy loss have made our data centers highly innovative structures in terms of electricity consumption. The technologies used are detailed in an internal specifications document entitled ECS 2.0.
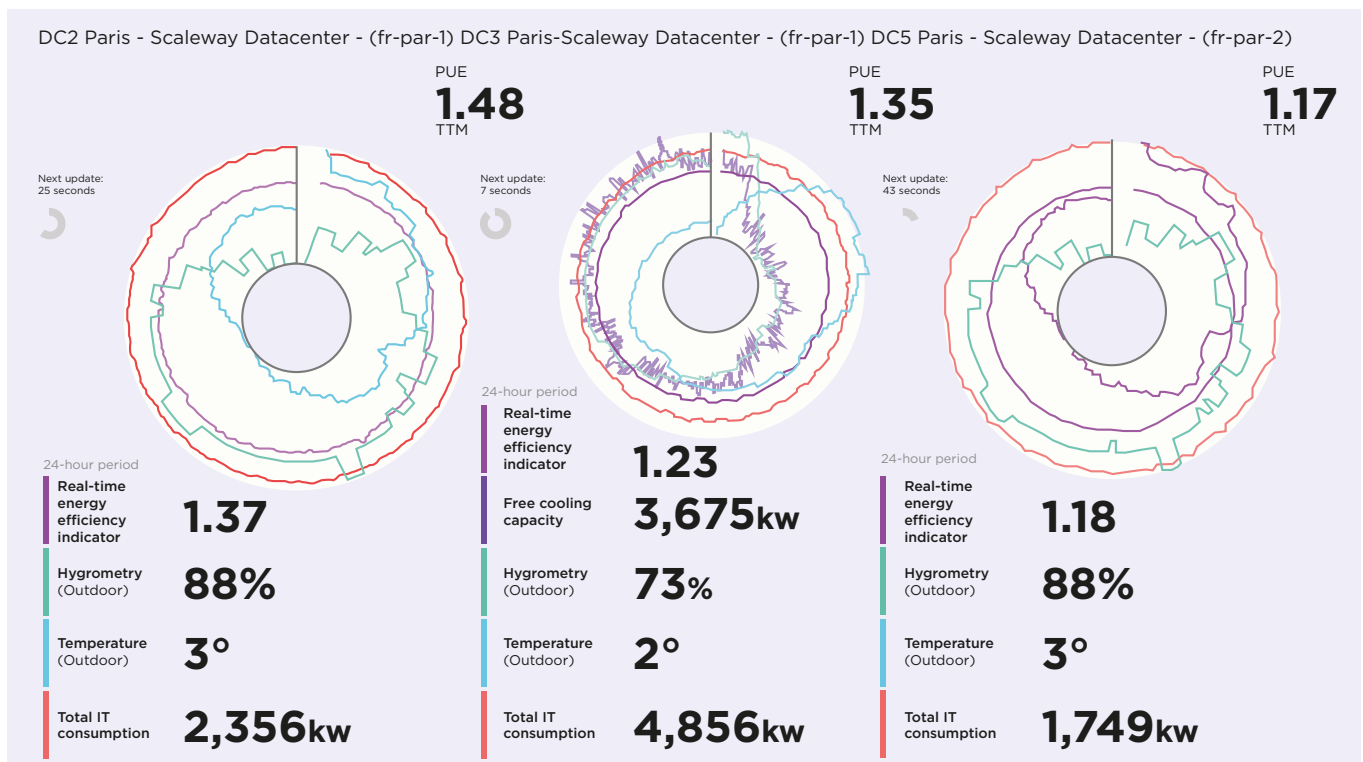
Name of data center operated by the Group	Subsidiary	Certifications
DC2 fr-par-1 Paris	*Scaleway*	ISO 27001 ISO 50001 HDS1 APSAD Code of Conduct
DC3 fr-par-1 Paris	Scaleway	ISO 27001 ISO 50001 HDS1 *APSAD* Code of Conduct Uptime Institute Tier III
DC4 fr-par-2 Paris	*Scaleway*	ISO 27001 ISO 50001 HDS1 APSAD Code of Conduct
DC5 fr-par-2 Paris	*Scaleway*	ISO 27001 ISO 50001 HDS1 *APSAD* Code of Conduct
MRS01 Marseille	*Jaguar Network/Free Pro*	ISO 27001 HDS PCI DSS
LYO02 Lyon	*Jaguar Network/Free Pro*	ISO 27001 HDS
LYO03 Lyon	*Jaguar Network/Free Pro*	ISO 27001 HDS

In addition, in line with the Kyoto Protocol and EU Directive 2003/87/EC, Scaleway has launched a plan to gradually replace sulfur hexafluoride (SF_6). This gas is currently used in traditional electrical switchgear, which will be replaced by vacuum switchgear by 2026.

In a bid to be as transparent as possible, the Group has decided to publish the energy indicators for its data centers in open data format. The energy performance of each of our data centers is therefore available on the website of Scaleway, our dedicated data center subsidiary.

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(1) *Water in France: resources and use – Summary of knowledge in 2021.*

(2) *Water use in Europe – Quantity and quality face big challenges, May 11, 2021.*

DC2 Paris - Scaleway Datacenter - (fr-par-1) DC3 Paris-Scaleway Datacenter - (fr-par-1) DC5 Paris - Scaleway Datacenter - (fr-par-2)

PUE
1.48
TTM

PUE
1.35
TTM

PUE
1.17
TTM

Next update:
25 seconds

Next update:
7 seconds

Next update:
43 seconds

24-hour period

24-hour period				
Real-time energy efficiency indicator	**1.37**	Real-time energy efficiency indicator	**1.23**	Real-time energy efficiency indicator	**1.18**

Real-time energy efficiency indicator | **1.37**
Free cooling capacity | **3,675**kw
Real-time energy efficiency indicator | **1.18**

Hygrometry (Outdoor) | **88%**
Hygrometry (Outdoor) | **73%**
Hygrometry (Outdoor) | **88%**

Temperature (Outdoor) | **3°**
Temperature (Outdoor) | **2°**
Temperature (Outdoor) | **3°**

Total IT consumption | **2,356**kw
Total IT consumption | **4,856**kw
Total IT consumption | **1,749**kw

Lastly, since 2021, customer invoices issued by Scaleway have shown energy use, water use and estimated carbon emissions for each product invoiced, with the initial aim of making customers more aware about their energy consumption.

4.2.2.2.2 Results and indicators

On energy efficiency and use of natural resources

The Group's Fixed and Mobile networks, together with its data centers, account for the vast majority of its CO_2 emissions.

Data center indicators	2020	2021	2022
Average PUE for iliad[a]	1.42	1.39	1.37
Average PUE published by the Uptime Institute	1.59	1.57	1.55
WUE (L/kWh)[b]	0.02	0.02	0.04

(a) Datacenters in France whose capacity is marketed (DC2, DC3, DC4 and DC5 at Scaleway and Marseille, Lyon Rockefeller and Limonest for Jaguar Network) i.e., approximately 17 MW net IT. Poland represents only about 3 MW net IT marketed and no historical data prior to 2022 are available.

(b) Weighted average of use by data centers operated by Scaleway in France (DC2, DC3, DC4, DC5).

Similarly, for CO_2 equivalent emissions, the Group considers it important to select relevant KPIs for mobile network emissions. The indicator used is therefore the amount of CO_2 emitted by the mobile network per gigabyte of mobile data consumed, as that is the indicator that the Group seeks to control, along with the kilos of CO_2 equivalent emitted by our subscribers (without distinction between fixed and mobile).

Network Indicators	2018	2019	2020	2021[1]	2022[1]
Grams of CO_2eq per Gb consumed (Group) – New indicator	NC	NC	37.9	41	38.9
Grams of CO_2 per Gb consumed (France)	11.6	10	8.6	9.5	8.6
Kilos of CO_2eq per subscriber (Group) – New indicator	NC	NC	6.9	5.1	3.9
Kilos of CO_2eq per subscriber (France) – New indicator	NC	NC	2.1	1.8	1.6

(1) *The 2021 figures for the new Group indicators and the 2022 figures include UPC over 12 months for both years.*

4.2.3 Carbon neutrality and achievement of our climate commitments: optimizing our mobility solutions

The vehicle fleet represents the main source of reductions for our Scope 1 emissions because it accounts for 6% of the Group's direct CO_2eq emissions[1] and 78% of Scope 1 emissions. The Group has a two-pronged objective concerning its vehicle fleet: minimize the increase in the fleet's size, while reinforcing the goal of significantly increasing the proportion of electric vehicles vs. gasoline/diesel powered vehicles in its three geographies.

In 2022, the fleet was stable despite further growth in our European operations: adding UPC Polska to the 2021 pro forma total, the fleet actually declined by 44 units in 2022. At end-2022, the fleet numbered 5,914 vehicles. The main factors underlying this performance in 2022 are as follows:

- 327 additional vehicles linked to the consolidation of UPC Polska in Poland, nine additional vehicles at constant scope;
- 71 fewer vehicles in France;
- 18 additional vehicles in Italy.

4.2.3.1 Policies and objectives

Our subsidiaries' vehicle policies changed since 2021 following the implementation of our Climate Plan announced in January 2021, in which we pledged that 25% of our vehicles will be electric by 2025.

The main areas in which we can take action for decarbonizing our vehicle fleet are setting CO_2eq emission ceilings in each vehicle category, reducing engine sizes, adding electric (or hybrid) vehicles, and financing charging points, both at employees' homes and at the Group's premises.

We are also focusing on the following three areas:

- Low-carbon mobility – renewing the vehicle fleet: Group policy for short distances is to use more environmentally friendly vehicles to reduce the fleet's carbon intensity and fine particulate emissions (nitrogen oxides) per kilometer traveled.

- Optimizing travel for roaming technicians: the Group seeks to reduce energy consumption and CO_2eq emissions by minimizing the distances between each appointment.
- Alternative transport solutions: the Group encourages employees to avoid using their cars and to choose less polluting means of transport. They are also recommended to use videoconferencing and conference calls whenever possible in order to reduce non-priority travel. The iliad Group has chosen not to provide its employees with "prestige" company cars. A company car is only provided after a realistic appraisal of its utility, and this will be reassessed periodically from 2023.

At Group level, our objective remains to reach an average performance of 20 grams of CO_2eq/km by 2035. To achieve this, we intend to significantly increase our proportion of electric vehicles so that they make up 25% of the fleet by 2025 (versus 3.8% in 2022).

4.2.3.2 Actions implemented

4.2.3.2.1 Optimizing the management of our vehicle fleet

Renewing the fleet to limit our environmental impact

When we recently renewed our vehicle fleet, the process took into account CO_2eq emissions, which led to the selection of vehicles with engines that emit less fine particles (NO_x). In addition, the Group is gradually adding new electric vehicles to the fleet, and had 220 of them in France (222 for the Group) at end-2022, representing 4.7% of the total fleet for France (2.7% in 2020).

These vehicles are made available for employee use, mainly for short journeys.

(1) *Scopes 1 and 2.*

Optimizing travel

Again in line with our aim of reducing the carbon footprint of our vehicle fleet, the IT system we use for scheduling the appointments and journeys of our roaming technicians helps to reduce energy consumption and CO_2eq emissions. This system's features include automatic route calculation and arranging the order of technicians' appointments to minimize the distances between them. As part of our green driving program, we provide eco-driving lessons to employees who use a car as part of their job.

Thanks to the optimizations introduced in 2021, it is now possible to track mileage data, driving behavior and vehicle energy consumption. As mentioned above, as part of our green driving program launched six years ago, eco-driving lessons are available for employees who use a car for their job.

— ROAMING TECHNICIAN MANAGEMENT

Feature	Aim
Technician's first appointment of the day is located as close as possible to the vehicle storage point	Optimize journey between home and first call-out location
Server automatically calculates distances between each appointment	Optimize the day's routes
Slot any new appointments into the previously calculated route	Optimize the distance between each appointment

— SCHEDULING MANAGEMENT

Feature	Aim
Creation of a scheduling procedure that proposes the best routes when appointments are changed	Optimize the day's routes
Creation of a graphic presentation of routes, with sectors differentiated by color	Optimize routes with the aid of a visual tool

4.2.3.3 Results and indicators

Average vehicle emissions

Our average emissions were down on a like-for-like basis in 2022 (including UPC Polska over 12 months) thanks to a greater proportion of electric vehicles in the mix in France (average emissions in France were down 3.7% in 2022) and thanks to Poland, where average emissions are 6% lower than in France.

	2019	2020	2021	2021 with UPC Polska	2022
NUMBER OF VEHICLES	**4,439**	**4,632**	**5,632**	**5,958**	**5,914**
France	4,240	4,402	4,777	4,777	4,706
Rest of the Group (Play consolidated from 2021 and UPC Polska from 2022)	199	230	855	1,181	1,208
Electric vehicles	17	25	128	129	222
Average annual emissions of kilograms of CO_2eq per vehicle	3,533	3,579	3,306	3,281	3,171

4.2.4 Carbon neutrality and achievement of our climate commitments: controlling the environmental impact of the supply chain

Reducing the environmental impact of our products requires closer control of the supply chain, both upstream and downstream. As part of our Climate Strategy, we set ourselves the goal of rethinking our entire supply chain in order to optimize it.

4.2.4.1 Policies and objectives

In order to control our emissions, we use the most environmentally friendly means of transport for our logistics operations.

Consequently, air freight is only used in exceptional circumstances and we are working on massively reducing our use of road transport.

Our aim is for trucks to be used only for the few legs of the journey where rail transport is impossible, and for air freight to account for less than 10% of our transport mix in the medium term. For deliveries of Freeboxes to subscribers, we use pick-up points as close as possible to subscribers' homes in order to avoid small, fragmented deliveries.

4.2.4.2 Actions implemented

Optimizing transport to and from logistics sites

Loads are optimized by packing more into containers and trucks. The format of the loading pallets used has been standardized in order to enhance the surface area/energy ratio. The Group also strives to eliminate empty running, with only full trucks going out on the roads. We now use reusable plastic shipping pallets which has increased the truck fill rate by about 30% and at the same time reduces waste by minimizing the use of wooden pallets and cardboard packaging.

To reduce inventories, costs and CO_2eq emissions, multiservice platforms have been set up from which products are distributed in an optimal way to end-customers (via local stores, pick-up points or home deliveries).

Favoring low-carbon means of transport through a multimodal transport mix

Multimodal transport – which combines road, rail, sea and, in exceptional situations, air freight – helps the Group to contain its energy consumption and greenhouse gas emissions.

Despite longer timeframes and more complex tracking processes, sea freight is the Group's standard form of transport for its Freeboxes as it is less polluting than other means of transport. Our teams at Freebox have therefore developed highly efficient systems for anticipating order levels.

For overland and inter-site transport requirements, Freebox is a pioneer in its industry as it uses rail for part of the freight journey, which is less polluting than road transport.

The war in Ukraine is one of the geopolitical events that could impact our transport strategy. The impossibility of transiting our orders by train from Asia to Europe without going through Russia could force us to use more carbon-intensive alternatives temporarily.

Optimizing our delivery logistics

We are also pursuing our efforts to reduce the number of deliveries to subscribers' homes and encourage the use of pick-up points. We have developed partnerships with specialized companies that have very good national coverage so that Freebox delivery and return points are located near subscribers' homes. Our network of Free Centers also has good nationwide coverage, with 189 stores across France at end-2022, offering another effective way of pooling shipments of Freeboxes and accessories.

The Group has also continued its partnership with a specialized transport company that can deliver to subscribers' homes at a pre-agreed time.

In a constant bid to reduce distances traveled, our logistics sites are located as near as possible to unloading and distribution points, i.e., as near as possible to subscribers and road freight providers.

Another way transport distances have been optimized is by reducing the number of links in the supply chain, with certain products delivered directly from the logistics platform to the Free Centers.

4.2.4.3 Results and indicators

In 2022, the Group saw the quantity of its products transported fall by 26% due to production issues experienced by our service providers (for deliveries of Freeboxes from Asia to France). In the mix, the use of air freight increased in 2022 due to the major semiconductor crisis dating from the end of 2020, causing very substantial tension on inventories of boxes and accessories, and requiring them to be replenished very quickly to meet demand. Our goal remains to use air freight as little as possible.

— **BREAKDOWN OF MODES OF TRANSPORTATION FROM ASIA TO FRANCE FOR FREEBOX**

	2020 adjusted[1]		2021 adjusted[1]		2022	
	Tonnes	Mix %	Tonnes	Mix %	Tonnes	Mix %
Air	417	11%	226	6%	902	31%
Sea	2,990	80%	3,543	91%	1,907	66%
Rail	0	0%	123	3%	73	3%
Road	339	9%	0	0%	0	0%
TOTAL	**3,746**	**100%**	**3,893**	**100%**	**2,881**	**100%**

(1) 2020 and 2021 have been corrected to correct calculation errors on the Rail portion.

4.2.5 Minimizing the impact of our products and promoting the circular economy

Freebox

In 2002, Free invented the world's first triple-play box, providing Internet access, telephone and television services for a single monthly fee. Since then, the Group has brought eight generations of Freeboxes to market, each featuring the latest technological innovations. From design to transportation and recycling of the Freeboxes, our teams work hard to reduce their environmental impact and take action across the value chain to fight programmed obsolescence. Freeboxes are designed to last. The Freebox Revolution, for example, has a useful life in excess of 10 years. The more recent Freebox Delta and Freebox Pop were designed according to the same principles, by exclusively selecting long-lasting technologies and materials for both the hardware and software components.

4.2.5.1 Policies and objectives

To reduce the environmental footprint of Freeboxes, action has to be taken across the value chain, from the design stage, through each production phase, and up to shipment to the subscriber.

The direct environmental impacts of Freeboxes relate to (i) their manufacture and reconditioning, (ii) their upstream and downstream logistics, and (iii) management of their waste electrical and electronic equipment (WEEE). The indirect impacts correspond to the energy consumed by subscribers when using their Freeboxes.

As part of its Climate Strategy, the Group has set itself the target of reducing the energy use of its subscriber base by at least 15% by 2025. We are totally opposed to programmed obsolescence and are therefore committed to extending the useful lives of our equipment to up to ten years. Our goal is to have a recycling rate of at least 80% for Freeboxes each year.

4.2.5.2 Actions implemented

Extending the useful lives of our boxes from the design and manufacture stage and fighting against programmed obsolescence

The products designed and brought to market by the Group are made to last.

We have our own R&D center so that we can control all of our product design and production processes based on an overall eco-design approach. Production specifications stipulate the use of recycled materials and the reduction in the amount of raw materials used in packaging.

Current generation Freeboxes are designed to be more multifunctional than earlier models, replacing a host of other devices (Blu-Ray™ DVD player, speaker, hard drive, etc.). Thanks to our continuous innovation strategy and the numerous capabilities integrated into our products, we are helping to scale back the number of devices in consumer homes.

The Group also pays particular attention to reducing subscribers' electricity consumption from the use of its products so as to minimize its indirect environmental impact and also lower subscribers' energy bills.

For example, the set-top box for the Freebox Revolution has a deep-sleep mode enabling electricity consumption to be reduced to less than 0.5 Wh, which is 30 times less than the previous generation. We regularly work with our suppliers to cut down the time it takes for the Freebox to re-start from the deep-sleep mode (enabling it to automatically go into deep-sleep mode as soon as it is switched off) or to program when the Freebox switches into deep-sleep mode depending on the subscriber's usage patterns.

In line with our climate pledges, environmental criteria are now a decisive factor in our supplier selection process. We are working with electronic component manufacturers to limit the energy consumption of our Freeboxes. And we are continuing our work on end-to-end life cycle assessments for all of our Freeboxes in order to give us a detailed, accurate picture of the current generation's environmental footprint and help to improve the eco-design of future generations. These assessments are conducted according to a protocol based on the main principles of ISO 14040, using the EIME tool developed by Bureau Veritas, which defines an ecopassport by product in line with the approach adopted by the European Commission in 2013.

Reducing the amount of packaging and optimizing its use

We have significantly reduced our utilization of single-use packaging, and our processes for preparing parcels for delivery to subscribers minimize the use of cardboard boxes. Our research teams have designed packaging made only of biodegradable materials and recycled paper. It is shaped and sized in line with the boxes it contains, which reduces both empty space and the amount of paper required. Freebox packaging is also optimized in terms of weight and volume and is designed to be resistant throughout the boxes' life cycle and ensure its primary function of maintaining quality standards in transport.

From a logistics perspective, the reduced volume of packaging means that more boxes can be transported in one delivery journey. This reduces the packaging used by the service providers responsible for transporting Freeboxes, as well as the carbon footprint related to such transport.

For several years now, the Group has also sought to design attractive packaging and encourage users to keep and return it. The new packaging can be used to return Freeboxes in the event of cancellations or for after-sales service or exchange.

Ensuring the reuse and recycling of our Freeboxes

In order to extend the useful lives of our Freeboxes, all of their materials are designed to be reused or recycled. The plastic casing, accessories and connector cables are reconditioned and re-used, while used materials such as plastic and motherboards are recycled, with material recovery. All used plastic is ground down to make new plastic components.

To ensure that our boxes can be reused, whenever subscribers terminate their subscription, the equipment provided to them has to be returned in good working order, failing which the subscriber is required to pay a penalty. This means that the parts of old Freeboxes can be reconditioned and used to make new ones.

The Group ensures that it complies with the applicable regulations concerning the recycling of waste generated by its activities. All waste generated by the Group's manufacturing operations – which make up the largest proportion of its total waste by volume – is sent to waste disposal providers, where it is fully recovered and/or recycled in accordance with the applicable European standards and regulations.

For managing its WEEE, the Group uses registered waste disposal providers. Freeboxes and related accessories (cables, remote controls, gamepads and plastic covers) are reconditioned in the Group's Freebox manufacturing plants in France or elsewhere in Europe before being redispatched for use by other subscribers. Any defective equipment is repaired at the same plants and any components that cannot be reused are recycled through specifically approved channels. The Group's Freebox teams have introduced a polishing process so that the plastic cover on the Freebox Crystal no longer systematically has to be changed when it is reconditioned. In addition, around 80% recycled plastic is used when the cover on the Freebox Revolution is changed. Leftover ground plastic is then sold to other industries that can use the material for their own purposes, such as garden or street furniture.

Mobile phones

Collecting used mobile phones and promoting reconditioning

Our Group stands out for its environmentally responsible choices relating to mobile phones. We chose not to make sales of mobile phones a key aspect of our marketing strategy when we entered the Mobile services market in 2012 and have kept that approach ever since. We have always refused to encourage our subscribers to replace their mobile phones before necessary and we intend to hold firm to this policy. The Group once again confirmed its responsible sales policy by launching Free Flex in 2021, ushering in a new way to get a mobile phone. In the long term, we are seeking to enter an economy of use rather than one of ownership, where the repair of our equipment is anticipated and facilitated from the design phase. With Free Flex, subscribers are not encouraged to get a new smartphone before they need to, as they are offered the same plan tariff either with or without a phone, at Free's fair prices. In addition, all of the handsets returned under the Free Flex offer are reconditioned or recycled, depending on their condition.

Similarly, on June 14, 2022 the Group announced a commercial partnership with Certideal, allowing existing or new Free Mobile subscribers to benefit from the best prices for refurbished phones, with discounts of up to 10%.

We have also set up programs throughout France for reusing/recycling mobile phones, encouraging people to drop off old phones that can be recycled. In addition, in line with the fifth pledge we made in January 2021 in our Climate Plan, we have installed collection boxes in all of our stores where people can drop off their mobile phones and accessories so they can be recycled.

A specific module has been included in the training program for all of our sales advisors to show them how to make subscribers and prospects aware of the importance of recycling and encourage them to drop off their used phones in store.

4.2.5.3 Results and indicators

Freebox

The waste generated and recycled in 2022 on behalf of the Freebox company – which accounts for most of the waste related to the Group's operations – mainly corresponded to plastic and electronic waste.

— BREAKDOWN OF WASTE RECYCLED ON BEHALF OF FREEBOX

In tonnes	2018	2019	2020	2021	2022
Plastic	746	1,022	1,636	1,411	1,240
Electronic waste	984	1,075	888	1,023	599
Scrap metal	47	38	58	93	71
Cables and wires	158	222	213	202	177
Other (hard drives, cardboard, plugs, foam, wood, etc.)	46	0	0	446	169
TOTAL	**1,982**	**2,357**	**2,795**	**3,175**	**2,256**
Change		*+18.9%*	*+18.6%*	*+13.6%*	*-28.9%*

It is important to put the Freebox recycling strategy into perspective with the rate of Freebox returns and the rate of reconditioned Freebox production (i.e., number of Freeboxes reconditioned out of every 100 put into circulation for new subscribers or migrations).

Results for Freebox	2020	2021	2022
Return rate	86.7%	94.3%	90.2%
Reconditioned production rate	62.1%	55.7%	61.1%

Mobile phones

The launch of Free Flex in 2021 has enabled us to promote reconditioned products even more widely among our prospects and subscribers.

	2019	2020	2021	2022
% of reconditioned phones sold out of the total volume of phones sold[1] (France)	3.0%	5.1%	9.4%	8.8%

(1) *Excluding private sales.*

The slight decline in 2022 is attributable to an unfavorable comparison base: in 2021, the post-pandemic shortage of electronic components weighed on production volumes of new smartphones and prompted many buyers either to postpone their purchase of a new phone or to opt instead for a reconditioned high-end model.

In Poland, the share of reconditioned phones is very low at this stage (0.4% in 2022, vs. 0.5% in 2021); our view is that this essentially reflects the iPhone's relatively small market share in Poland (less than 7% according to our estimates, although iPhones represent the bulk of the reconditioned phone market), and an average price for a smartphone almost 50% lower in Poland than in France.

4.2.6 Application of the European taxonomy to iliad's activities

Under European Regulation 2020/852 (known as the "Taxonomy Regulation") on establishing a framework to facilitate sustainable investment within the European Union (EU), iliad is required to publish KPIs for its full financial scope of consolidation, showing the proportion of its net revenues OpEx and CapEx that are classified as "eligible". Eligible revenues, OpEx and CapEx are derived from/associated with economic activities that are considered sustainable within the meaning of the Taxonomy Regulation because they contribute to two climate-related objectives: climate change mitigation and climate change adaptation. iliad assessed the eligibility of its activities and set its KPIs for 2022 on the basis of the implementing legislation for the Taxonomy Regulation, i.e., the Climate Delegated Act of June 4, 2021 and the Disclosures Delegated Act of July 6, 2021. The Group will progressively publish the "green" proportion of its revenues, OpEx and CapEx, and since 2021 has disclosed the KPIs relating to activities that contribute to the two above-mentioned climate objectives.

4.2.6.1 Presentation of iliad's Taxonomy KPIs

The Group's economic activities have been analyzed on the basis of the Taxonomy Regulation (and delegated acts). The regulation's "Information and communication" sector covers four economic activities falling under NACE codes J60, J61, J62 and J63.11.

Economic activities	Description of the activity	Associated NACE code
Data processing, hosting and related activities (section 8.1 – Annex 1 Climate change mitigation)	Storage, manipulation, management, movement, control, display, switching, interchange, transmission or processing of data through data centers, including edge computing.	J63.11
Computer programming, consultancy and related activities Data-driven solutions (section 8.2 – Annex 2 Climate change adaptation)	Providing expertise in the field of information technologies: writing, modifying, testing and supporting software; planning and designing computer systems that integrate computer hardware, software and communication technologies; on-site management and operation of clients' computer systems and/or data processing facilities; and other professional and technical computer-related activities.	J62
Data-driven solutions for GHG emissions reductions (section 8.2 – Annex 1 Climate change mitigation)	Development or use of ICT solutions that are aimed at collecting, transmitting and storing data, as well as its modeling and use where those activities are predominantly aimed at the provision of data and analytics enabling GHG emission reductions. Such ICT solutions may include, inter alia, the use of decentralized technologies (i.e. distributed ledger technologies), Internet of Things (IoT), 5G and Artificial Intelligence.	J61 J62 J63.11
Programming and broadcasting activities (section 8.3 – Annex 2 Climate change adaptation)	Programming and broadcasting activities include creating content or acquiring the right to distribute content and subsequently broadcasting that content, such as radio and television programs for entertainment, news, debate, and the like. Also included is data broadcasting, typically integrated with radio or TV broadcasting. The broadcasting can be performed using different technologies, over-the-air, via satellite, via a cable network or via Internet. This division also includes the production of programs that are typically narrowcast in nature (limited format, such as news, sports, education, and youth-oriented programming) on a subscription or fee basis, to a third party, for subsequent broadcasting to the public.	J60

An analysis of the NACE codes has been carried out for the Group's various subsidiaries, and these activities were checked against the definitions of economic activities in the European Taxonomy Regulation. This analysis shows that only three Group companies (Scaleway S.A.S., Jaguar Network S.A.S.U., 3S sp. z o.o.) perform an economic activity considered eligible (data processing, hosting and related activities, associated with NACE code J63.11). This activity is considered eligible for the climate change mitigation objective.

The application of the NACE code J63.11. to the figures of these subsidiaries, in proportion to the Group figures, gives the following figures:

2022	Group (€m)	% eligible for the Taxonomy	% aligned
Revenues	8,372	2%	0%
Operating expenses (OpEx)	2,665	2%	0%
Capital expenditure (CapEx)	2,139	2%	0%

Eligibility is based on the description of activities as provided in the Taxonomy Regulation and does not take into account the substantial contribution or do no significant harm criteria. OpEx and CapEx include "individually sustainable" eligible expenses relating to the Group's entire scope (e.g., expenses relating to the purchase or leasing of electric vehicles or the additional cost of purchasing guarantees of origin) and not only to a scope confined to the three subsidiaries whose activities are eligible.

As the Taxonomy's actual scope of application is very restricted and excludes the base activities of the telecoms sector, eligible data were not material for the Group in 2022. Based on a preliminary assessment of the technical review criteria required by the Taxonomy Regulation (substantial contribution, no significant harm criterion for the other objectives and compliance with minimum safeguards), it appears that these eligible activities are non-Taxonomy-aligned.

— TABLE 1 – REVENUES

Share of revenues from products or services associated with Taxonomy-aligned economic activities – Information for the year under review

Economic activities	Code(s)	Total revenues	Share of revenues	Substantial contribution criteria — Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems	Do No Significant Harm criterion — Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems	Minimum safeguards	Share of Taxonomy-aligned revenues in the year under review	Share of Taxonomy-aligned revenues in the prior year	Category – (enabling activity)	Category – (transitional activity)
		Functional and presentation currency	%	%	%	%	%	%	%	YES/NO	YES/NO	YES/NO	YES/NO	YES/NO	YES/NO	YES/NO	%	%	E	T
A. Taxonomy-eligible activities																				
A.1. Environmentally sustainable activities (Taxonomy-aligned)																				
Revenue from environmentally sustainable activities (Taxonomy-aligned) (A.1)																				
A.2. Taxonomy-eligible but not environmentally sustainable activities (non-Taxonomy-aligned)																				
Data processing, hosting and related activities	J63.11	130	2%														0%	0%		
Revenue from Taxonomy-eligible but not environmentally sustainable activities (non-Taxonomy-aligned)		130	2%														0%	0%		
Total revenue of Taxonomy-eligible activities (A.1 + A.2) (A)		130	2%														0%	0%		
B. Non-Taxonomy-eligible activities																				
Revenue from non-Taxonomy-eligible activities (B)		8,243	98%																	
TOTAL (A + B)		8,372	100%																	

— TABLE 1 – CAPEX

Share of CapEx related to products or services associated with Taxonomy-aligned economic activities – Information for the year under review

Economic activities	Code(s)	Absolute CapEx	Share of CapEx	Substantial contribution criteria						Do No Significant Harm criterion						Minimum safeguards	Share of Taxonomy-aligned CapEx, year under review	Share of Taxonomy-aligned CapEx, prior year	Category – (enabling activity)	Category – (transitional activity)
				Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems	Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems					
		Functional and presentation currency	%	%	%	%	%	%	%	YES/NO	YES/NO	YES/NO	YES/NO	YES/NO	YES/NO	YES/NO	%	%	E	T
A. Taxonomy-eligible activities																				
A.1. Environmentally sustainable activities (Taxonomy-aligned)																				
CapEx related to environmentally sustainable activities (Taxonomy-aligned) (A.1)																				
A.2. Taxonomy-eligible but not environmentally sustainable activities (non-Taxonomy-aligned)																				
Data processing, hosting and related activities	J63.11	62	2%														0%	0%		
CapEx related to Taxonomy-eligible but not environmentally sustainable activities (non-Taxonomy-aligned)		62	2%														0%	0%		
Total CapEx related to Taxonomy-eligible activities (A.1 + A.2) (A)		62	2%														0%	0%		
B. Non-Taxonomy-eligible activities																				
CapEx related to non-Taxonomy-eligible activities (B)		3,265	98%																	
TOTAL (A + B)		3,327	100%																	

— TABLE 1 – OPEX

Share of OpEx concerning products or services associated with Taxonomy-aligned economic activities – Information for the year under review

Economic activities	Code(s)	Absolute OpEx	Share of OpEx	Substantial contribution criteria						Do No Significant Harm criterion						Minimum safeguards	Share of Taxonomy-aligned OpEx, year under review	Share of Taxonomy-aligned OpEx, prior year	Category – (enabling activity)	Category – (transitional activity)
				Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems	Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems					
		Functional and presentation currency	%	%	%	%	%	%	%	YES/ NO	YES/ NO	YES/ NO	YES/ NO	YES/ NO	YES/ NO	YES/ NO	%	%	E	T
A. Taxonomy-eligible activities																				
A.1. Environmentally sustainable activities (Taxonomy-aligned)																				
OpEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)																				
A.2. Taxonomy-eligible but not environmentally sustainable activities (non-Taxonomy-aligned)																				
Data processing, hosting and related activities	J63.11	60	2%														0%	0%		
OpEx of Taxonomy-eligible but not environmentally sustainable activities (non-Taxonomy-aligned)		60	2%														0%	0%		
Total OpEx of Taxonomy eligible activities (A.1 + A.2) (A)		60	2%														0%	0%		
B. Non-Taxonomy-eligible activities																				
OpEx of non-Taxonomy-eligible activities (B)		2,605	98%																	
TOTAL (A + B)		2,665	100%																	

4.3 SUPPORT THOSE WHO ARE BUILDING THE DIGITAL WORLD OF TOMORROW

For three years, we have been living in a complex macroeconomic environment characterized by a health crisis, an energy crisis and the resurgence of inflation. However, while remaining cautious, our Group is facing up to the challenge thanks to its sound fundamentals, a responsible investment strategy and an ongoing recruitment policy.

We are maintaining our HR policy by creating jobs and involving our employees in the Group's success with a compensation policy blending collective and individual measures.

We estimate that the iliad Group now ranks as the sector's second-biggest employer in France, with growth in its French workforce amounting to more than 2,400 net jobs over the last five years (and nearly 500 in 2022 alone). iliad currently has nearly 10,200 employees in France (excluding joint venture staff) and over 16,700 Group-wide (mostly in Europe).

— BREAKDOWN OF WORKFORCE BY GEOGRAPHIC AREA

	at December 31, 2022	at December 31, 2021	at December 31, 2020	at December 31, 2019	at December 31, 2018	at December 31, 2017
Number of employees based in France	10,162	9,681	9,134	8,603	7,812	7,731
Number of employees based outside France	6,562	5,398	5,588	2,496	2,316	1,980
o/w Italy	*812*	*694*	*624*	*458*	*311*	*76*
o/w Morocco	*1,478*	*1,805*	*1,949*	*2,038*	*2,005*	*1,904*
o/w Poland	*4,272*	2,899	3,015	-	-	-
TOTAL WORKFORCE	**16,724**	**15,079**	**14,722**	**11,099**	**10,128**	**9,711**

— BREAKDOWN OF WORKFORCE BY BUSINESS LINE (POLAND CONSOLIDATED FROM 2021)

	at December 31, 2022	at December 31, 2021	at December 31, 2020	at December 31, 2019	at December 31, 2018
Subscriber relations	25%	25%	35%	40%	43%
Network/Technical/IT	53%	53%	57%	55%	51%
Retail	17%	16%	6%	6%	4%
Other	5%	5%	2%	2%	2%

4.3.1 Diversity and attracting talent

4.3.1.1 Policies and objectives

Diversity is much more than just the outcome of a policy. It is an integral part of our purpose. We ascribe a great deal of our success to the combination of the very diverse profiles of our iliad Group employees, with nationals from 87 countries. It is a cornerstone of the Group's robust corporate culture, built on a shared passion for technological innovation. Promoting equal opportunity in a group with technical and technological potential is not easy. First and foremost, the Group values talent without

distinction. More than graduates, we are looking for passionate and committed applicants. We recruit our employees and promote them on the basis of their soft skills, their expertise and their backgrounds. To combat job insecurity and create a corporate culture that is a source of satisfaction for its employees, while at the same time providing the Group with the stability it needs to pursue its strategy over the long term, iliad aims for at least 90% of its employees to be on permanent contracts.

4.3.1.2 Actions implemented

An exciting employer brand to attract talents in all areas

Work on our employer brand

In 2022, we looked at the fundamentals that unite us all within the iliad Group in France. This resulted in audits of our three images:

○ our desired image: what is our vision as an employer?

○ our actual image: what is the reality experienced by our employees?

○ our projected image: how are we seen by applicants?

This work was carried out in collaboration with Tambour Battant, a firm that met and interviewed various stakeholders throughout the project, from Group management to directors of key entities, "transformed" applicants (those who have joined us), "drop-out" applicants, headhunters and employees who have been with the Group for less than one year and more than five years. It also involved visits to several locations to get a fuller grasp of our identity.

Among the key findings:

○ total internal alignment around an organization in "commando" mode championed on all links of the chain;

○ a singular, widely supported and uninhibited internal culture: one of "critical benevolence" blending human values and performance;

○ employees who serve naturally as ambassadors;

○ respect for individuals throughout the Group;

○ individualized approach to employees.

2023 will be an opportunity to transform this audit and its findings into practical initiatives to highlight the components of our employer brand for applicants, giving them the means to better project themselves in our Group.

○ Our HR vision.

○ Our HR pillars.

○ Our HR promise.

Similar work was carried out on the Free Pro scope, whose activity is very much B2B. The initial idea of revisiting the brand image was broken down into a series of messages and visual identities to bring out both the commercial brand and the employer brand. At the end of December 2022, Free Pro seized the communication opportunity offered by the relocation of its two sites in Marseille to present its employer brand to employees.

2022 was also marked by the takeover of Polish operator UPC, which was merged into our Polish subsidiary, Play. The merger process was followed by work to align the two subsidiaries' employer brands on their various platforms and networks.

Welcoming and onboarding policy

The Group places great importance on the welcome it gives new employees.

For several years, it has been holding monthly inter-entity and inter-business Welcome Days in France. Enjoyable morning-long events, they break down into three parts: presentation of the Group, Q&A with the Group's Directors, then brunch and souvenir photos.

Monthly lunch meetings also bring together the CEO and the HR Officer, and small groups of a dozen employees.

Within the entities, onboarding and immersion days/weeks are organized at various frequencies depending on the entity and the position held.

Examples

In contact centers, each newly hired employee is assigned a sponsor. Sponsors all boast a wealth of experience in their job, and their role is to provide support to new employees just starting out. Sessions for sharing best practices and informal conversations on the way the company operates are also organized.

At Scaleway, each newcomer is invited to a session dedicated to the company culture, good communication practices, and the notion of feedback, which are the founding principles of collaboration within the entity.

Presence on forums and social media

To reach out directly to applicants, the iliad Group:

○ takes part in recruitment forums. Other than "classic" forums, such as the APEC forum, our teams participate in a number of more specialized events including the digital inclusion summit (organized by the Mozaïk Foundation), whose second edition was held on November 29, 2022;

○ seeks to keep a high profile in various recruitment channels: social media (LinkedIn, Twitter, etc.), job boards, media dedicated to work and employment (Welcome to the Jungle).

Promotion of new activities

Our major projects often create jobs, and we are always keen to talk about them as soon as they take on a significant dimension, as a means of promoting the Group's innovation and dynamics and attracting new applicants. With this in mind, on November 22, 2022, we issued a press pack highlighting the new Free Proxi support service and its strong recruitment dynamic geared towards fielding local teams throughout France. A hundred agent positions are available throughout France. They are full-time permanent contracts. A dozen work-study positions are also open in the Paris region; others will soon be opened elsewhere in France. The contracts are permanent work-study contracts and the training is provided through F233, our corporate university. The recruitment process is simple: applications are submitted via our Careers site; preselected applicants are required to sit a written test followed by an interview with the Free Proxi teams.

Recruiting together in an innovative and inclusive way

Showcasing of our jobs by our employees

Our employees are our best ambassadors. They are the ones who really know how to talk about their jobs and promote them among future applicants. That is why we give them the chance to reach out to others in short videos posted on the "Careers" page of our **iliad.fr** website.

To increase the number of women within the Group, a special focus is being put on talented female employees working in jobs that previously mainly attracted men. On the iliad website, a Free Mobile employee talks about her job as a radio engineer.

Co-opting is one of the other vital recruitment channels that we seek to encourage. We all share the firm belief that employees who are "happy in their job and in the Group" will be the perfect intermediaries, putting the Group into contact with potential talents in their entourage.

Examples

Free Distribution promotes this recruitment channel through "Boost cooptation", doubling the bonuses granted to co-opting employees over given periods.

And the policy is paying off, as shown by the example of Free Mobile. In 2022, co-opting resulted in 29 hires (approximately 15% of new hires), and 37 co-opting bonuses were paid. To date, all co-opted individuals who completed their trial periods in 2022 are still in our workforce.

At Free Pro, 27% of 2022 hires were co-opted, reflecting employees' active involvement in the company's growth.

Challenging our methods and innovating

The world of work is constantly shifting, and we have to keep up at all times with the changing expectations of applicants of different generations. Thinking out of the box when it comes to recruitment is a never-ending challenge. For example, an experiment is underway in our "store" scope on recruitment via video rather than CV. With the Ile-de-France stores as the pilot, the aim is to address a population that is not familiar with traditional job boards. A social media campaign gives people the chance to apply for a job by posting a video on YouTube, or to record it directly on our recruitment tool, Softy.

Free Pro is particularly enthusiastic about this approach, and has put together a disruptive recruitment scheme in partnership with sales training school Iconoclass. Their partnership has taken shape in the form of talks by Free Pro teams to Iconoclass learners: a full day based on the transmission of information, tips, and practical cases on specific "Sales" themes. The day is a chance for us to pre-qualify the profiles that really stand out, to give the Iconoclass trainees visibility on the jobs they could have at Free Pro, and to pass on the company's culture.

To speak with one voice on our shared values, we regularly hold workshops to harmonize our offers, although we always seek to keep the specific identity of each of our entities.

Our Polish subsidiaries have worked hard to automate the recruitment process for sales staff, through automated skills tests using the BRIGHT and Staffly tools, and by adopting deferred video interviews. These actions have come with an alignment of recruitment policies, teams, processes and practices between UPC and Play, with a view to improving the applicant experience. Managers have also been trained in good recruitment practices.

Inclusive recruitment

Our recruitment policy is embodied in and aligned with our commitments, which are set out notably on our **iliad.fr** website:

- "Diversity – Our identity"… For us, digital has no boundaries, no skin color, no religion. It is universal by its very nature. And we make every effort to welcome employees with disabilities. In recent years, two scopes – Protelco and the iliad UES – have had an agreement involving an active commitment to maintaining and developing support for colleagues and future colleagues with disabilities. Our goal is for disability to cease being a subject and to become an integral part of our corporate culture. This is especially so for Certicall, Centrapel and Protelco, entities where people who have officially declared their disability make up 8%, 7% and 6% of the headcount respectively.

- "Employability – Our responsibility"… the Group is a major job creator. We recruit many young people and a lot of people with no qualifications. And some of our job offers even say as much in black and white: "no qualifications required" (namely Protelco offers). In several of our subsidiaries, resolute action has been taken to promote "non-discriminatory" recruitment. A "Recruit without discriminating" training course has been rolled out at Equaline for all HR populations, but also for the operational staff who provide support for the recruitment teams selecting applicants. By giving recruitment criteria an objective basis through the "STAR guidelines", Scaleway is seeking to eliminate selection bias and turn the focus back on to the essential ingredient – competence.

- "Gender balance – Our pride"… The Group values talent, without distinction. During the mandatory annual negotiations, Free Pro reaffirmed its determination to promote a recruitment policy that combats discrimination, particularly discrimination based on the applicant's gender. Free Pro is now committed to increasing the proportion of women in its workforce to at least 23% by December 31, 2023, notably by stepping up its efforts to recruit women for technical and sales positions. The same issues have found the same response at Free Réseau, which achieved 6% growth in its female workforce in 2022 and continues to promote its jobs. In our Polish subsidiaries, discussion and networking circles allow female managers to share their difficulties and give each other advice. At the same time, webinars are available for managers to raise awareness of unconscious bias and provide the keys to inclusive communication.

Sharing value with everyone

Overall compensation policy

In 2022, investment in overall compensation in France averaged 8%, including a cost-of-living bonus (paid to 90% of our employees, 82% of whom received a net amount of €1,000), additional profit-sharing, a sum earmarked for career development and promotion within the Group, and a sum negotiated with our union partners. Our various collective bargaining agreements now all feature measures going beyond legal minimums.

One particularly telling example of our HR policies is the "health expenses" agreement concluded at the end of 2020, which is more advantageous for the vast majority of our employees via a single rate for the employee and his or her dependent children, and an employer's share of 55%.

In addition, several employee shareholding schemes are in place within the Group, including two "Uptoshare" plans implemented in 2019 and 2021. The second was a great success, with nearly 5,000 employees subscribing.

To keep key employees (talents, scarce skills) within the Group, special shareholding or bonus plans are also in place.

Equal pay

The Group takes care to ensure equal pay for men and women who carry out equivalent jobs and have the same levels of skills, responsibility and performance. In particular, we are careful to eliminate any pay gaps between women and men with equivalent skills and seniority.

The 2022 Gender Equality Index, published on March 1, 2023, saw the Group record a consolidated score of 91/100 across all entities, an increase of 3 points on the previous year. The MCRA UES (up 19 points), Protelco (up 10 points), and Free Pro (up 4 points) all made good progress. Also noteworthy were the readings for two entities reporting their index for the first time: Predictiv Pro earned a total of 82 points and Freebox a total of 75 points.

4.3.1.3 Results and indicators

In 2022, the Group created 279 net jobs (481 in France), excluding the integration of UPC. At December 31, 2022, 92% of the Group's total employment contracts were permanent (94% in France). We take great care over our recruitments for all employee categories and we favor permanent rather than fixed-term contracts. This demonstrates our commitment to forging long-term relations with our employees and providing them with a stable employment situation. In 2022, 1,762 external recruitments were made across the Group, compared with 974 resignations and 673 dismissals.

The Group is a responsible employer, and as such offers employment opportunities for young people by giving them their first job, the possibility of developing their skill sets, and real prospects for in-house promotion and internal mobility. For example, in 2022, nearly 10% of the workforce (over 1,581 people) was aged 25 or under, and around 50% was aged 19 to 35.

— **BREAKDOWN OF WORKFORCE BY GEOGRAPHIC AREA**
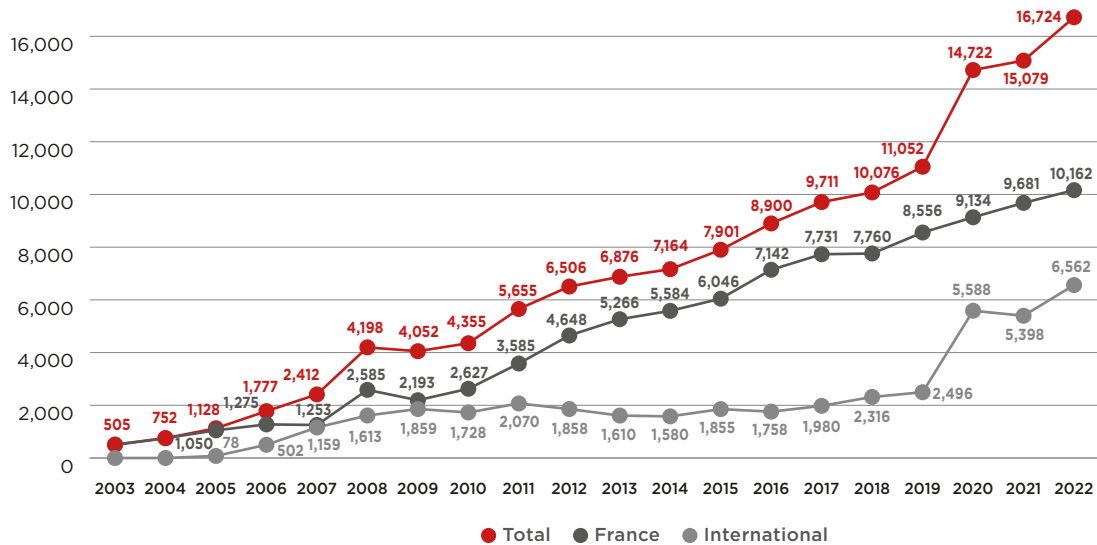
— BREAKDOWN OF WORKFORCE BY AGE
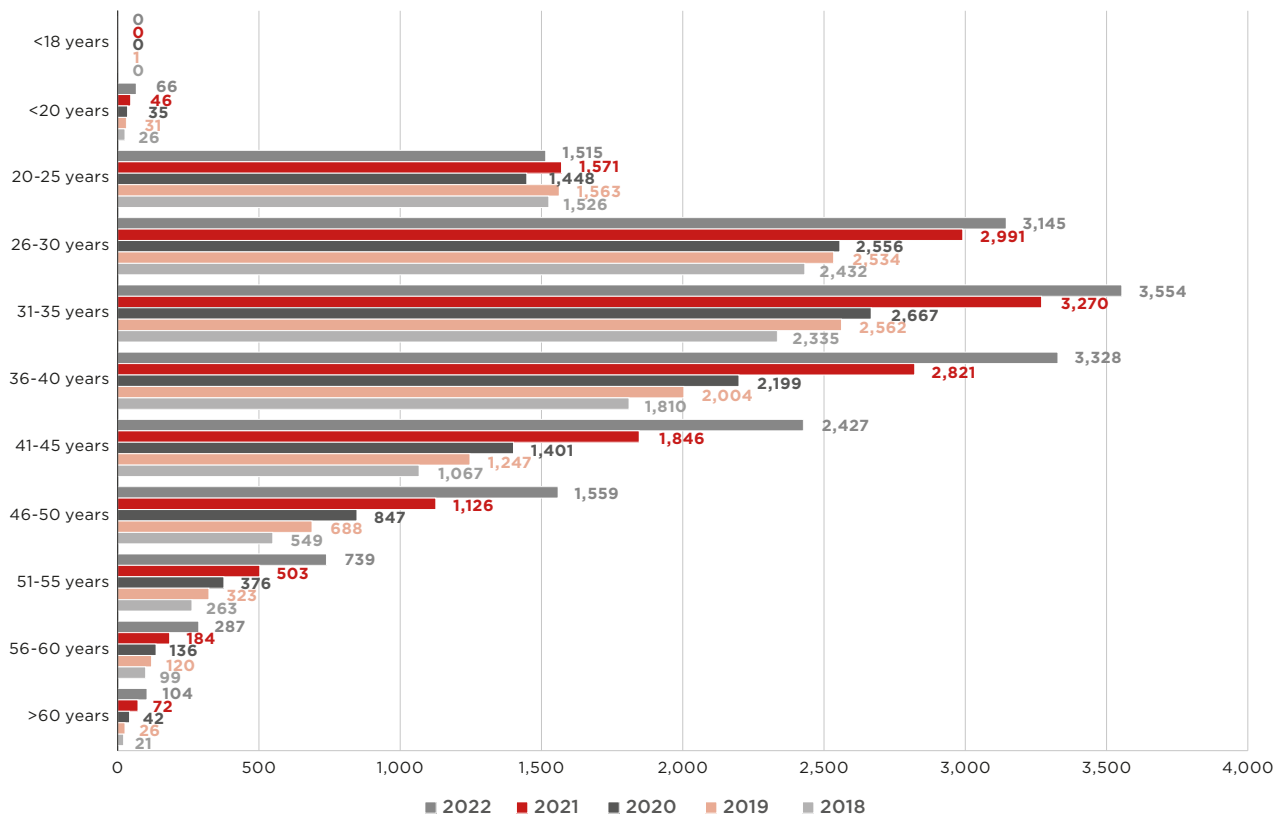
2022	Pay gap (%)		Difference in individual pay increases (in % points)		Promotion gap (in % points)		Percentage of employees receiving a raise after returning from maternity leave (%)		Number of women among the 10 highest paid employees		Sum of the countable indicators		Index (out of 100 points)			
	Points obtained	Maximum points	Points obtained	Maximum points	Points obtained	Maximum points	Points obtained	Maximum points	Points obtained	Maximum points	Points obtained	Maximum points	Points obtained in 2022	Maximum points	2021	2020
ILIAD UES	36	40	20	20	15	15	15	15	5	10	91	100	91	100	92	95
MCRA UES	38	40	20	20	15	15	15	15	10	10	98	100	98	100	79	94
Protelco	40	40	20	20	15	15	15	15	5	10	95	100	95	100	85	80
Jaguar Network	35	40	20	20	15	15	15	15	0	10	85	100	85	100	81	61
Scaleway	36	40	5	20	15	15	15	15	5	10	76	100	76	100	91	64
F-Distribution	40	40	10	20	15	15	15	15	10	10	90	100	90	100	94	89
FREEBOX (new)	25	40	35	35	-	-	15	15	0	10	75	100	75	100	N/D	N/D
Predictiv Pro (new)	35	40	35	35	-	-	-	-	0	10	70	85	82	100	N/D	N/D

4.3.2 Mobility and skills development

4.3.2.1 Policies and objectives

Our commitment to fair access to employment comes hand in hand with a determination to inspire vocations. Offering vocational contracts and career paths is a way for us to give all our employees the keys to their employability.

This commitment is also reflected in the significant investment made in continuous skills updating through a training policy aligned as closely as possible with the day-to-day work of our teams. New technologies are constantly emerging and taking root in companies. This means that employees need to adapt and be given appropriate training. In the digital age, ensuring that our people can build their skill sets, and that their capabilities are adapted to market needs, is vital – not only for their individual motivation but also for the future of the Group as a whole.

Lastly, our employees can project themselves out of their initial job and into a range of career paths opened by the great breadth of our activities. That turns our innovations and business development into opportunities to build up internal mobility and career momentum. To get the most out of internal mobility and ensure that employees have the chance to adapt and boost their careers, the Group aims to provide at least 30 hours of training per employee per year.

4.3.2.2 Actions implemented

Vocational training for the future

Vocational and apprenticeship contracts

We are developing new contractual tools in response to the fierce competition for skills in the market. For networks, subscriber relations and support services, the Group has a proactive training policy for new hires which goes hand in hand with its recruitment policy. The consistency between these two policies lays the foundations for motivating employees and building their loyalty right from when they first join the Group.

Vocational contracts, subsidized contracts and "free jobs" earmarked for residents of priority urban areas are all ways of getting our future talents on board. As we transform, we implement them in order to recruit and develop the skills of the employees destined to bring our new ambitions to life tomorrow. We are therefore committed to a day-to-day process of employment assistance while offering our future talents the chance to develop the skills necessary for their new job.

Examples

In 2022, the Group managed more than 250 work-study contracts and interns. For many, a work-study contract within the Group is synonymous with a permanent contract. This is particularly so at Free Pro, where more than 20% of work-study students were hired in 2022.

At December 31, 2022, the number of apprenticeship contracts in progress in our main entities was as follows:

- Free Réseau: 57;
- Free Mobile: 19;
- Scaleway: 9;
- Free Pro + Predictiv Pro: 23;
- FD: 27;
- iliad Italia: 15.

The number of vocational contracts in progress within the contact centers:

- in progress within the contact centers: 102 contracts.

At Certicall, multimedia advisors are recruited in "free job" zones wherever possible, in partnership with Pôle Emploi. This was the case for four employees this year. In addition, all multimedia advisors joining Certicall first complete a one-year vocational contract allowing them to obtain a professional qualification certificate. This was the case for 29 employees at Certicall and 50 at Equaline this year.

In 2022, Protelco set up a dedicated course for its work-study students, in partnership with CFA Ducretet. The program's objective is to provide comprehensive training for our work-study trainees, allowing them to acquire the key skills for the position of Free Proxi operator-technician so that they can provide quality assistance to our subscribers.

This training is intended for future advisors working in the Free Proxi service, which consists of advising, informing and troubleshooting our fixed and mobile subscribers remotely and in their homes. In total, work-study trainees receive 315 hours of training spread over a period of 12 months, including 140 hours provided by the Ducretet network and 175 hours provided by Protelco trainers. They also have a dedicated tutor between training periods, to help them put the theory into practice within their team. Training is aimed at developing five key skills:

- have the right attitude: interpersonal and writing skills;
- know the copper and fiber networks;
- be comfortable with processing software (production tools, logging);
- provide assistance to our subscribers (remote and home assistance);
- sell our fixed and mobile offers.

At Scaleway, the Launchpad initiative is designed to offer training for the position of DevOps Engineer, giving young Scaleway recruits the keys to build and maintain the company's cloud APIs. This is broken down into three major skills to be mastered:

- build and use APIs in the Scaleway environment;
- restructure old Scaleway code;
- work as a team in the Scaleway environment.

The program consists of four months of intensive training followed by six months in a work-study team.

The 399 hours of intensive training over the year are broken down into two parts:

- Agency: during these periods, the intern team produces code as a subcontractor for Scaleway's internal teams. The primary objective is to learn by doing; the code produced is destroyed and redone until the required quality is achieved;
- Training: these periods are devoted to learning and theoretical exercises.

Initial training

Induction training remains a key element of the Group's human resources policy. The onboarding process includes intensive initial training before the job actually starts. The Group's "technical" entities also offer long and progressive training courses with one-on-one mentoring so that new hires all receive the personalized support they need.

Outside the F233 University, the induction courses are led by Group employees who have on-the-job knowledge and have followed "train the trainer" programs. These trainers are assisted by training managers who are responsible for monitoring the courses given and their overall quality,

Examples

- New Free Proxi employees receive three weeks of initial training, i.e., 105 hours dedicated to mastering the fundamentals of the job of operator-technician. New Free Proxi team leaders receive initial training on how to lead and oversee a team, public speaking, leading meetings, psychosocial risk management and combating harassment.
- In the contact centers, new hires receive five to seven weeks of initial training, split between theoretical and practical phases, thereby easing them into the position. This allows them to acquire all the internal knowledge bases enabling them to carry out all the tasks required by their position. Participants complete specific training modules on the use of shared and business-specific internal tools.
- New Free Center advisors start with 13 days of initial training (91 hours in total). Their first steps within Free Distribution are based on a blend of e-learning, in-store observation sessions, and face-to-face sessions. The aim here is for them to acquire the basics of the job of advisor, to discover the store universe, and to develop the commercial and technical skills necessary to take up the position through the use of internal tools and role playing. Peppered with a series of quizzes to validate knowledge, the course culminates with a week of immersion in the field.

Validation of acquired experience and diploma courses

Our entities, in partnership with the F233 corporate university, are also driving forces in the construction of validation of acquired experience pathways. Validation of acquired experience (VAE) is a means of allowing people to have their professional experience recognized in the form of a professional qualification diploma, title or certificate. It allows people to obtain qualifications through experience (and not only through initial training), rather than by sitting exams.

The result is that over 30% of all employees who have started a VAE process since 2018 have changed jobs and been promoted within the company.

Our ambition with the VAE program is to recruit talented individuals without any qualifications, and to let them earn academic recognition after a few years on their internal path. This commitment promotes loyalty among our employees, but it is also in the Company's interests.

Examples

In 2022, 29 employees from various entities began a process of validating acquired experience in three courses:

- Project Manager course (Master's level) consisting of 14 days of training plus 30 hours of VAE support;
- Operational Business Management course (Master's level) consisting of 12 days of training plus 30 hours of VAE support;
- Retail and Distribution course (Bachelor's level) consisting of 24 hours of VAE support.

Nationwide, 42% of certificates obtained through the VAE system are diplomas. Today, 90% of our employees have earned a diploma.

Developing skills throughout people's careers

Assessments and talent reviews

Recruiting and training our employees is just the first step. In 2022, entities wishing to strengthen talent support and retention structures implemented an ambitious skills assessment and development policy. From the definition of job objectives to the employee's continuous assessment and the collective talent review, the entire support chain is currently undergoing major change.

Examples

Scaleway has implemented an ambitious plan aimed at setting clear objectives for each employee in line with strategic ambitions. Once these objectives have been set, an individual assessment process is used to monitor the employee's development through rituals throughout the year (annual appraisal, career interview, managerial feedback, etc.):

- monitor the achievement of individual objectives;
- assess the acquisition of key skills;
- discuss employee feedback on managerial practices;
- discuss the workload;
- share career and development requests (training, pay, mobility, etc.).

The growing importance of close support for talent through these regular rituals is reflected at Free Pro in the introduction of two annual interviews in 2022.

At Freebox, 360-degree interviews have been introduced, using the Elevo tool allowing employees to collect feedback from all their peers, thereby reinforcing the objectivity and exhaustiveness of these assessments.

At Certicall, high-potential employees are identified for internal mobility during interviews. Employees identified as having potential for the targeted position are coached to sharpen their skills. At Protelco, employees can request career updates, which are geared towards helping employees develop their career path, especially in view of the skills development plan defined in the company, to clarify their career objectives and to identify success factors. Another aim is to identify their areas of improvement in view of their acquired skills, recorded in the management tool (iliad UP).

In Poland, UPC and Play have introduced an annual feedback process with managers to unify the skills expected of the managerial line, assess managers' performance and identify the Top Managers.

Lastly, for iliad Italia, priority has gone to the implementation of 20 workshops bringing together 250 employees, aimed at strengthening the ability of all employees to invest personally in their professional development by learning to set objectives and to collect feedback from peers.

At the same time, managers are playing an increasingly important role in employees' career development. Training managers to support their teams' careers has become vital as a means of guaranteeing the success of these policies. Free Distribution has accordingly ushered in training to prepare managers for conducting annual appraisals and skills assessments. Scaleway has also trained its entire management team in the definition and evaluation of SMART objectives, to help foster team development.

Following individual assessments, Scaleway regularly organizes collective reviews allowing managers to make shared decisions regarding assessments, career plans and salary decisions for the employees in their teams.

Protelco has also established career committees that can meet two to four times a year, in addition to career updates. They are led by the relevant segment or department manager, the business manager and a member of the human resources department.

They serve to:

- assess the pool of skills within the company;
- adapt the skills development plan by offering consistent training;
- identify people with potential and offer them vacant positions matching their skills;
- provide a better view of employees' aspirations;
- promote connections between jobs.

The career committee is also a forward-looking management tool for the development of both the company and the employee.

Mandatory training

The Group took numerous measures in 2022 to reduce the number of accidents, particularly among Free Distribution, Protelco, Free Réseau and Free Mobile staff. Its policy is built on training and awareness-raising for teams from the moment they arrive and throughout their careers. Training plans are also developed in close sight of teams and field workers to ensure that they reflect the reality of their work and that they take into account the various risks inherent to it.

Examples

To raise their awareness of risk prevention in their jobs, new hires in one of our network installation subsidiaries (Free Réseau, Free Infrastructure, Free S.A.S. and Free Mobile) attend a two-hour safety induction training session the first day they start work.

Technicians take an additional three-hour module during their first induction week. Similarly, all of Protelco's new roaming technicians are given a safety training session lasting around one hour as part of their induction training, during which all of the risks inherent to their post and the related preventive measures are carefully explained. They are also regularly informed about proper driving postures and how to correctly wear a backpack to balance the load. For office-based workers, information is regularly provided about working on screen.

Examples of training provided regularly within the Group:

- training on gestures and postures;
- electrician accreditations (B2V, BR, BC and H0, B0, BC and BE measurement);
- working at height accreditation;
- the CACES® license to operate aerial work platforms;
- PPE inspections for aerial work platforms;
- training on psychosocial risks;
- training to prevent musculoskeletal disorders;
- occupational first-aid training (widely offered in all Group entities);
- CATEC training for working in confined spaces;
- training in electromagnetic fields;
- online training in Covid-19 precautionary measures;
- fire extinguisher training and fire drills;
- training for armed robbery situations (provided in our stores);
- positive communication training, managing emotions, etc.

Various awareness-raising initiatives were also carried out within the Group, mainly via emails or webinars, including:

- a sleep webinar;
- information about working on screen;
- tobacco-free month;
- road risk awareness;
- an addictions webinar.

Optional training

Although safety training remains central to our system, new subjects have been added to iliad's training offer. The bi-monthly meetings of the training committee resulted in a Group-wide catalog of training providers, a selection of training solutions shared among several units, joint negotiations on trainer fees, and training data reporting systems used by all the Group units.

Giving our employees access to 17,000 LinkedIn Learning courses has enabled them to activate more than 12,184 licenses since 2020, and to complete 10,931 hours of training.

The Group endeavors to leverage the knowledge of its most experienced people and to share their insight and expertise. Consequently, the training committee continued to offer training curricula dedicated to developing skill-sets, such as sales, technical abilities and management. It also conducted courses leading to certification based on the French validation of acquired experience (VAE) program. These curricula are generally led by specialized outside trainers, an approach that helps enhance the quality of the service provided.

2022 was also focused on strengthening support for managers. Targeted initiatives and courses have been designed in several entities to help managers play their key role.

Examples

In addition to the safety training already mentioned, examples of the topics covered by the specific training courses deployed in 2022 include:

- cyber-security and GDPR;
- databases and SQL language for non-IT staff;
- the basics of labor law for managers;
- how to be a good tutor;
- expert-level Excel;
- Freebox and configurations for subscribers;
- subscriber behavior and communications (video calls);
- what to do when an employee is unfit for work (management training);
- reflectometry (*Backbone*);
- network architecture and equipment;
- non-violent communication;
- personal data protection for EU citizens;
- communication between two people;
- improving editorial impact;
- public speaking;
- time management;
- good practices in change management;
- one-on-one coaching.

Numerous training courses have also been rolled out in our Italian subsidiary:

- three-day digital transformation, agile approach and new working methods training;
- written and interpersonal communication training, and time management when working from home;
- "The Art of Effective Negotiation" provided by the Palo Alto school;
- technical training for the Radio Network engineering department (144 hours of training on network topics, TLC, etc.).

In addition, an internal academy – iliad College – is now also up and running in Italy. Its purpose is to train in-store employees on subjects such as iliad's values, the commercial approach, 5G

technologies, user experience and relational intelligence. On completing their courses, participants become part of a community with the chance to attend monthly meetings on a range of topics.

In Poland, the X-Sell campaign (the first joint offer between UPC and PLAY) came with training on the offer, systems and sales practices for 1,700 sales agents. More broadly, the Technology Academy format offers talks for all employees on questions relating to technologies, offers, products and mobile devices, given by internal and external experts.

Moreover, Group employees all have unlimited access to three self-training offers available at any time:

- LinkedIn Learning: a comprehensive on-demand training offering containing over 17,000 online video courses designed by professional trainers to acquire new skills;
- Projet Voltaire: to help employees become more comfortable with written French, the Group has subscribed to Projet Voltaire. People joining the Group each receive a free license;
- Neo Forma: this specialist in corporate health and safety training offers a range of awareness-raising courses to help people take care of their own health and that of others, to learn to prevent everyday risks and as such to become an actor in the workplace wellbeing approach within the Group.

  Via our external LMS tool, in 2022, 3,109 people in the Group also took a module on the GDPR, and a further 2,661 on cybersecurity.

At Free Pro, the dedicated Manager modules allow the acquisition of the managerial skills necessary to oversee and lead a team:

- conducting meetings and conflict resolution;
- team management through steering and organization;
- motivating and leading your team;
- successful public speaking;
- recruiting and onboarding new employees.

Free Distribution has a three-stage pathway:

- engagement and self-awareness;
- face-to-face communication;
- collective dynamic within a team.

At iliad Italia, managerial training involves an approach based on the definition of a corporate culture, in several stages:

- assessment of the internal culture (focus groups, surveys);
- immersive training for managers on leadership skills and managing complexity;
- co-design activities to define the leadership model and the associated practical exercises.

Projecting yourself within the Group

Giving visibility to our jobs and career paths

The Group aims to encourage employees to develop their expertise and strengthen their involvement with subscribers. With the diversity of our jobs, we see internal mobility as an opportunity to create individual career paths, to develop new

skills and to gain in turn from a holistic vision of our business. In 2022, just over 500 people transferred to other positions in the Group, representing nearly 13% of hires.

This goal is a major asset in building subscriber and employee loyalty alike.

Examples

To promote mobility, the iliad Group also launched "iliad Inside" internal meetings to provide information on vacant jobs in 2022. They are moments of exchange where employees from different teams can present their day-to-day lives, their expertise and their challenges. This year, we had the chance to hear about:

- Lab42, presented by Free SAS developers;

- the Radio team, presented by Free Mobile employees;

- the marketing team, presented by iliad SA employees.

Our Italian subsidiary also organizes communication in a "Curiosity box" newsletter format, highlighting a different team each month so as to build up knowledge about the organization as a whole and foster collaboration.

The iliad Inside initiative is rounded out by a monthly iliad UP Mobility newsletter. Sent regularly to all Group employees, it features the latest job offers open to internal mobility and accessible on the iliad Up Mobility tool. At any given time, an average of 600 internal offers are available to Group employees in a wide variety of jobs.

Promoting mobility also means promoting examples of career paths. So employees who have changed jobs within the Group are regularly called on to recount their experiences in the "Stories of Mobility" format posted on our intranet, daili. In December, Martial told us how he went from being a Freebox salesman at Certicall to a mobile platform manager at Qualipel and then to his current position as regional coach for Free Distribution, a job that involves coordinating some 10 store managers in a region. These major projects are led by the Group HR Development team with the help of the corporate HR managers and the HR teams of the Group's different entities.

Implementing mobility for all

To facilitate access to job opportunities within the Group and identify employee career development and/or mobility aspirations, in December 2020, a skills mapping and mobility management platform – iliad UP skills and iliad UP mobility – was rolled out to all employees, with a new version launched in early 2022.

The initial work was designed to map our core skills and job families, improve data reliability and consistency in the databases, and then get employees, managers, HR teams and other stakeholders involved in the reporting process to build buy-in as we co-constructed the Group's jobs and skills repository.

It is being deployed in stages so that it gradually becomes one of the entry points for employee reviews, co-constructed career paths and skills development programs. We also offer employees skills assessments to help them with their mobility objectives.

The new iliad UP platform enables employees to play an active role in managing their careers by directly applying for job openings posted by the Group. Moreover, the employee skills and career development and/or mobility aspirations posted on the platform provide invaluable information for managers and HR teams seeking to support and retain talented people.

A total of 404 employees were promoted across the Group in 2022, including 214 to managers. As well as being the hallmark of our culture, these promotions are a powerful symbol of how effectively knowledge is transferred within the Group.

Similarly, the vast majority of our managers started out lower down in the organization before stepping up to management positions, and some now to strategic executive positions. At Equaline, for example, 100% of employees in management, helpdesk, training, support and HR positions were appointed internally.

In addition to promotions, the ESP agreement signed in July 2019 ensures that the mobility process is properly respected by defining the rules applicable Group-wide.

Our mobility projects – Focus on Free Proxi

In addition to internal mobility initiatives, which are now an integral part of the daily lives of our teams, transformation and innovation within the Group's entities are synonymous with chances for employees to take their careers in a new direction. Choosing internal mobility when creating teams means choosing to trust in the skills and adaptability of our employees.

Examples

Free Proxi is the new local assistance service created by Free for its subscribers, delivered by small, locally based teams of eight to ten Free advisors, who are readily available online to answer any questions about Freebox and Free Mobile plans. Thanks to their local presence, the Free Proxi teams have detailed knowledge of their region's fixed and mobile network infrastructure. They can easily troubleshoot possible incidents, and even go directly to the subscriber's home to restore service or exchange a device. In this way, subscriber issues can be handled from start to finish by the same team, and sometimes by the same advisor.

Thanks to our resolute internal mobility policy, two-thirds of Free Proxi's staff hail from other iliad Group entities.

We continue to communicate with Group employees wishing to take part in this exciting project, through news on our intranet. An interactive map of vacant Free Proxi positions is also available to everyone on our iliad Up Mobility website.

This dynamic will be bolstered in the coming months and years to support the rollout of Free Proxi throughout France, notably through the implementation of an employment and career path management system.

In 2022, new positions were created in Free Mobile's Radio Supervision Team, and internal mobility was called on to help find the skills needed for the 16 vacant jobs. Following dedicated communication in Scroll, the Group newsletter, five employees received internal transfers to the team.

4.3.2.3 Results and indicators

Training represents a significant investment for iliad. In 2022, 14,583 employees received internal training at Group level and 8,095 completed at least one external training course. The two main topics were safety and the environment.

The Group provided 535,776 hours of training in 2022, the equivalent of 32 hours per employee.

	Training hours				Average monthly headcount				Training hours/average annual headcount			
	2022	2021	2020	2019	**2022**	2021	2020	2019	**2022**	2021	2020	2019
Total – France	362,125	361,085	252,240	356,200	9,876	9,484	8,836	8,273	37	38	29	46
Total – Outside France	173,651	160,936	116,325	175,491	6,611	5,502	2,537	2,241	26	29	46	69
TOTAL	**535,776**	**522,021**	**368,565**	**531,691**	**16,488**	**14,997**	**11,372**	**10,514**	**32**	**35**	**32**	**51**

4.3.3 Health, safety and workplace wellbeing

4.3.3.1 Policies and objectives

Providing a safe, inclusive and positive working environment is a priority for the iliad Group. Each year, we make significant headway in these vital HR areas. In terms of safety, we put in place many awareness-raising and training initiatives[1], and introduced practical tools for reducing risks, both for our employees and service providers. The importance placed on workplace safety in the employee satisfaction survey continues to increase, rising from 88% in 2021 to 92% in 2022[2].

The implementation of new technologies results in the network regularly undergoing changes, requiring the installation of new equipment and the replacement or maintenance of existing equipment. Our people travel frequently to different sites, carrying out a wide range of technical interventions, including working underground or at height. The Group is therefore exposed to the risk of occupational accidents, whose number and severity it constantly strives to reduce.

The Group has a well-established health and safety policy to protect the physical and mental wellbeing of all its people.

The aim of this policy is not just to reduce occupational accidents or illnesses, as no company can reasonably aim for zero accidents or illnesses, but it's all about identifying and preventing risks. This risk identification and prevention work is carried out annually (or whenever necessary if significant changes take place during the year), via the update to the DUERP occupational health risk assessment report (*Document Unique d'Evaluation des Risques Professionnels*) that all entities in France are required to file, along with the related action plans.

At iliad we apply a continuous improvement approach to our health and safety performance and implement a wide range of prevention measures. These include awareness-raising and training sessions and constantly improving personal protective equipment, particularly for technicians, who are the most at risk of an occupational accident due to the diversity of the locations where they carry out their work.

4.3.3.2 Actions implemented

Guaranteeing a safe working environment

The DUERP occupational risk assessment report

Preparing and filing the DUERP occupational risk assessment report and related action plan enables each unit to manage the preventive measures taken to safeguard the health and safety of its employees.

A review is performed at least once a year to update the DUERP as needed, track the initiatives underway and define new actions to be taken in the following year. The DUERP may also be updated during the year if there is a major change in the Group's organizational structure or if a particular risk emerges. This was the case in 2020, for example, with the health crisis.

To ensure the traceability of information/exposure to occupational risks identified in the DUERP, Free Réseau now uses risk exposure sheets, signed by employees, for all positions within the entity. All such sheets are available on our intranet, daili.

Stakeholders in workplace health and safety

These policies and procedures are defined and implemented by a dedicated team of employees specialized in workplace health and safety issues.

In addition, the Group works closely with occupational physicians and nurses to (i) identify the health and safety characteristics of each workstation and obtain practical recommendations; and (ii) support employees on a case-by-case basis, for example by improving working conditions for employees experiencing physical or psychological stress, or by adjusting workstations following an accident or proactively when a person with disabilities is hired.

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(1) *See details of training courses in section 4.3.2.*

(2) *https://iliad-strapi.s3.fr-par.scw.cloud/Barometre_social_2021_Synthese_Groupe_4c4db0d153.pdf.*

Sedentary and mobile safety officers have been appointed at Free Réseau to act as relays for the safety prevention unit in the field to take action in dangerous situations. Before taking up their position, they are trained on what is expected of them and the rules that apply in their work.

Individual and collective protective equipment

Among other preventive measures, employees are provided with equipment appropriate to any work situation that poses a particular risk. We regularly review change in work situations and the related equipment to ensure that we are always on top of the challenges of prevention. Examples of personal protective equipment include harnesses, lanyards, helmets, safety shoes, gloves, helmets and earplugs. Collective protective equipment includes guardrails and marking. Purchases of accessories to prevent back pain or poor posture include trolleys, backpacks and tool belts. On the recommendation of our occupational physician, certain sedentary employees are provided with lumbar cushions and ergonomic seats for specific physical problems. Field employees are also provided with all the protective equipment they need. Field technicians, for example, are assigned vehicles with automatic transmissions, accessories to ease driver seating and other features. All of this equipment is supported by regular information concerning the correct postures for its safe use.

The condition and use-by dates of protective equipment are regularly reviewed so that it is appropriately replaced as needed. In late 2021, Free Réseau rolled out an IT application that simplifies checks and makes it easier to monitor equipment used for working at height, both for reviews carried out by managers and for safety audits. Where required, the monitoring process can trigger automatic orders for new equipment and requests for scrapping old equipment. As such, in 2022, an aerial work platform verification sheet was adopted for Free Réseau. Users must validate several control points before using the equipment. In addition, operating procedures have been adopted to list the equipment to be placed in an aerial work platform to respect the tool load.

Effective healthcare coverage

Finally, in line with our overall aim of helping and supporting our people, we take care to provide all of them with the same high-quality coverage for healthcare costs, at competitive prices.

The components of the employee healthcare and personal protection coverage set up in 2018 and renewed in 2021 are as follows:

- employees in France have a supplementary health insurance plan that provides top-up benefits in addition to the amounts received under the French statutory health regime. This mandatory plan offers employees (and their children, if any) more favorable benefits than the minimum coverage stipulated in the applicable collective bargaining agreements;

- employees may also opt to purchase additional cover by paying into an individual plan that has been especially negotiated by the Group to offer participating employees very good, yet affordable, supplemental coverage.

- The Group has also set up a personal protection insurance plan that provides all employees with death and disability coverage. Under this plan, employees receive a replacement income if they become incapacitated or disabled. In the event of an employee's death, a life annuity is paid to their spouse as well as an education benefit for each dependent child until their 26th birthday.

- In addition, the Group has negotiated a competitive rate with several options available for the spouses of its employees.

Examples

The health crisis has put the spotlight on the risk linked to biological agents during a pandemic and exacerbated that related to psychosocial risks. Numerous action plans have therefore been set up in the Group's entities to implement appropriate processes, instructions and training.

At F-Distribution (Free stores), the Workplace Health & Safety and Wellbeing teams were strengthened to give the central teams an even greater role in assisting teams in the field and to create a network of safety ambassadors throughout our store network. These ambassadors operate directly in the field, working to identify areas for improvement and to help store managers implement sustainable solutions. Incident reporting procedures have been reinforced, as have specific protocols for managing certain situations, particularly those relating to the heightened risk of aggressive behavior. The incident reporting tool has been redesigned to facilitate the reporting of minor incidents that are all too often overlooked as some of them have become so commonplace.

At Protelco/Free Proxi, our field support and local subscriber support entity, the "occupational accidents/employee" ratio remained stable, with an improvement at the end of the year against the backdrop of strong growth in the headcount.

At Free Réseau, our optical fiber rollout and maintenance entity for fixed and mobile services, the focus was placed on psychosocial risks (PSR) in 2022. A specialized external consulting firm led a collaborative effort combining our Human Resources, and Health and Safety Prevention teams, and our unions. Voluntary workshops to identify PSRs were conducted throughout the country, based on geographical proximity. The PSRs identified will be included in the single document to be presented and distributed in 2023. Awareness-raising initiatives for employees on risk exposure are also ongoing. As is the case each year, protective equipment was reviewed and reinforced where necessary.

Our actions on health and safety are not restricted to our employees. For example, Free Réseau and Free Infrastructure now track the health and safety performance of their contractors by:

- preparing a prevention plan jointly with each contractor;

- performing safety audits;

- conducting safety briefings with contractors.

Ensuring the health and wellbeing of all

In line with our corporate values, ensuring the wellbeing of our people is an absolute priority. Working conditions are a key factor in employee engagement and therefore the Group's overall performance.

A working environment where people feel good

We seek to provide all of our employees with optimal working conditions. To that end, the Group embarked in 2018 on a plan to carry out remodeling work at its various sites each year (head office, regional offices, etc.). The aim is to enhance working environments and adapt them to the needs of employees and their wellbeing.

The head office and many sites now all feature "home feel" relaxation areas.

For many years, employees working at the head office have had permanent and free access to hot drinks from quality vending machines. A cold soft drink is also offered free of charge.

Examples

At Protelco, within the Free Proxi cells, our local teams are kept deliberately small – between 8 and 10 people – in the aim of promoting cooperation between their members. This also fosters a family spirit within our teams, which in turn promotes genuine loyalty among our employees. Because happy advisors make for happy subscribers, we pay particular attention to the working environment of our local teams. The Free Proxi spaces are designed as real living spaces, with a large part dedicated to break and eating areas to make them more enjoyable. Located in the heart of our subscribers' residential areas, these spaces are more akin to small, comfortable apartments than offices. And as they are located close to our employees' homes, they are also synonymous with a better work-life balance.

In another register, but with similar objectives of reducing travel time and protecting the environment, Free Réseau has opened regional logistics centers (RLC) in Île-de-France. The project aims to increase proximity and reduce business travel by opening sites as close to the field as possible, outside Paris. This involves providing technicians with sites located closer to their work area for them to pick up equipment and meet, thereby removing the need to have to go into Paris. A study has also been conducted to allow most of the relevant people in sedentary jobs, formerly assigned to our Paris headquarters, to work closer to their homes and their team in the field. It is reckoned that this will allow 61% of the employees concerned to reduce their current commuting time, thereby achieving the twofold aim of improving work-life balance and optimizing office space in the Paris headquarters.

Lastly, more recently, at the end of 2022, our Free Pro teams moved to SMARTSEA, their new headquarters in Marseille, offering them a new and very pleasant working environment, with common areas to foster exchanges between teams working on the same or different subjects. The move was an opportunity to combine two sites and to bring all employees to one place. This relocation project provided Free Pro with the means to meet three objectives:

- CSR: an environmental and sustainable development policy with goals of zero paper, zero bottled water in vending machines and zero coffee capsules;

- clean desk policy: SMARTSEA was imagined as a showcase for our customers, visitable at any time and reflecting our quality of service and professionalism. A clean and tidy office makes our business much more presentable to anyone wishing to visit. So we have opted for lockers rather than boxes and a policy of a common living area (ground floor and seventh floor) where employees can take their coffee breaks and eat lunch;

- a focus on workplace wellbeing: eating better, communicating better and staying on the move. From March, employees will have access to the gym and a coach, with optional group classes for €19.90 per month. A better eating policy has also been launched with unlimited free organic fruit, compatible connected fridges offering a gourmet selection, without compromising on the quality of service and above all committed to its social and environmental impact.

A working environment designed to accommodate our employees with disabilities

Facilitating measures are implemented for employees with disabilities as part of company agreements and charters, or through targeted initiatives.

Examples

With a company-level agreement on disability, first signed in 2015 and renewed for three years on December 16, 2020, Protelco continues its commitment to implementing a long-term policy in favor of the employment of people with disabilities and their retention in their jobs. By fully integrating this issue into everyday operations, from hiring to workstation adjustments, and changing perceptions of disability, the policies have driven an increase in the number of disabled employees, to 6% of the workforce at year-end 2022.

In 2020, the entities making up the iliad UES signed a three-year agreement on disability issues. This agreement was renegotiated at the end of 2022 for signing on January 13, 2023 to strengthen our commitment to welcoming and/or supporting employees with disabilities. Within the iliad UES, our Disability Manager takes part in integration meetings and visits the various sites to raise awareness on the subject and to study workstation adaptation needs.

In our contact centers, some of our disabled employees' workstations have been replicated at home, to facilitate work-from-home arrangements (ergonomic seats, sit-stand platforms, various accessories). Moreover, Centrapel regularly renews its partnership with DEAFI to have a cell entirely composed of deaf and hearing-impaired workers in charge of the treatment of our subscribers with the same type of disability.

At F-Distribution, an in-house ergonomist assists with workstation design at the head office and in our stores. This came after a disability diagnostic-initiative aimed at identifying relevant actions with regard to the obligation to employ disabled workers and the way the company operates, and to suggest ways of implementing them. This diagnosis resulted in a plan of 20 actions ranging from the management of the disability policy to raising employee awareness, recruitment, integration and career management for employees with disabilities.

At Free Pro, a disability charter has been adopted, and awareness-raising sessions are held regularly, including a day of collective action on the theme "Handi'Cap at work, what is it?" On-demand consultations are also available to answer employees' questions and help them put together a file to have their disability officially recognized. These actions have enabled three employees to come forward and have their disability recognized.

One of the key moments for highlighting the subject within the Group comes with the organization of events during the European Disability Employment Week. This year, our disability manager, equipped with the Handicube, came to meet employees from different entities, directly at their workstations. By a roll of the dice, participants were given an accessory reproducing a physical disability. Their challenge was to continue performing their everyday tasks with a splint, cataract glasses or helmets replicating deafness.

Preserving work-life balance and Workplace Wellbeing

We have set up a Workplace Wellbeing group, which meets several times a year to discuss workplace wellbeing initiatives and decide which ones should be implemented within the Group, as well as to ensure that best practices are shared between entities.

This group's work helps achieve our overall aim of continuously improving our work organization methods and encouraging flexible working arrangements. We have made it a policy to let employees organize their working time with, whenever possible, a degree of flexibility and independence.

Since 2021, the Group has signed individual agreements giving employees the chance to work from home one or two days per week depending on the entity. Managers are tasked with organizing this option in their teams and determining the eligible positions, in a spirit of fairness. Individual agreements define the framework, obligations and reversibility conditions of working from home.

In addition, with this same aim of giving employees the best work/life balance, each Group entity has adopted measures concerning the right for workers to "disconnect" – i.e., not to engage in work-related electronic communications – outside working hours. These measures, implemented following talks with employee representatives, take the form of collective agreements that not only set out best practices but also encourage rest and recuperation, vigilance over workloads, and reasonable and proper use of communication tools (professional messaging and chat systems and/or company telephones).

Examples

Activities are organized within the Group during Workplace Wellbeing Week.

At Free Mobile, awareness of a good work-life balance is provided to radio supervision teams, subject to specific schedules and an on-call system. A single document and a dedicated action plan are currently being drawn up. They are expected to be adopted in 2023.

At F-Distribution, regular communication is provided on health, and employees can contact the Workplace Wellbeing team via a hotline. In addition, the HR teams speak at each meeting of regional managers on a topic related to workplace wellbeing.

Scaleway organizes regular "wellness weeks". The program includes webinars on subjects such as managing emotions, mental health, meditation and nutrition. Yoga classes and massages are also available to employees on request.

PLAY, our Polish entity, recently adopted the Mindgram tool, offering employees personal development content, but also psychological support as needed. In the first month, 17% of employees signed up for this content.

In our 2022 survey, 84% of our employees said that their work allows them to strike a balance between their personal and professional lives (80% in 2021).

Strengthening cooperation and the direct link between teams

The new forms of work associated with the Group's growth require us to find ways to maintain our uniqueness, to promote cooperation within and between teams, and to preserve special moments bringing people physically together.

Tools, communication media and projects for collaboration

A study was conducted in 2022 to harmonize communication tools – messaging, chat, workspace, document sharing and videoconferencing – within the Group. The aim is to roll out an effective package of shared work material and communication tools in France in 2023. This work is also a response to an area of improvement identified following the analysis of our 2022 employee satisfaction survey on work tools, where our employees estimated the effectiveness of our working methods at 64% (72% in 2021).

Examples

At the European level, a "Fra-Pol-Ita" working group has been launched to promote the sharing of good practices between the Group's three main European countries, France, Poland and Italy. Working groups have been launched on each of the Group's key themes and services. The first feedback was provided in mid-January 2023.

At Scaleway, the Worktango project combines within a single tool all the functionalities that allow us to survey the state of mind of our teams and their level of engagement and satisfaction, and also to allow employees to acknowledge the work of their peers, in line with Scaleway's values.

In addition to an annual employee satisfaction survey conducted by the Group, a monthly "Pixo" survey is conducted within the MCRA UES. The participation rate averages 75%, and employees are questioned on a variety of topics related to engagement and workplace wellbeing. The aim is to identify action plans to be implemented to achieve progress on these themes throughout the year.

Also in our Polish entities, a "Pulse Survey" is used to measure the mood of the teams through frequent quick surveys, allowing managers to collect feedback from their teams.

Transparent and direct communication

Since 2018, we have regularly relayed information about the Group – in text, image and video format – in our in-house newsletter, Scroll. The aim of this newsletter is to share information with all employees in France about the Group's news or specific activities or people.

We also regularly provide information via email and webinars about the Group's results, key news or specific actions and events, as well as holding transparent discussions with employees through video question and answer sessions. This type of communication is a regular feature both in France and in our Italian and Polish subsidiaries.

A new intranet known as "daili" has been rolled out to centralize Group news in one place, provide a common directory and distribute information to employees in a targeted manner via pages dedicated to the "entities".

At Free Distribution, the monthly newspaper, OneTeam Mag, is regularly enriched with short video formats putting the spotlight on different teams. OneTeam Mag also provides news from the entity, sales results and articles recounting slices of life and collective events. In line with our goal of direct communication, Xavier Niel regularly answers questions from Free Distribution employees through webinars where the floor is open to everyone.

For contact centers, all employees receive the monthly Free For You newsletter containing all the most important news.

Collective events

The health crisis highlighted the importance of face-to-face meetings and the need to maintain these essential moments of exchange. The various events that had to be put on hold or temporarily switched to remote arrangements all resumed in face-to-face format in 2022 – to the great satisfaction of our employees.

Examples

At F-Distribution, the two highlights of the year are "Top Ones Day" and the "Manager Day" seminar. The Top Ones 2022 day was an opportunity to celebrate the 31 sales consultants who stood out by virtue of their exemplary sales performance and quality of service in Free stores. On June 8 and 9, all Free Distribution managers and support functions came together for Manager Day, two days of reunions and encounters on the "Feel Free" theme.

At Free Mobile, eight seminars were held in 2022 (six in the regions and two in Greater Paris). They allowed employees from the same region to meet with the main managers from head office in order to discuss business figures, review objectives, and raise awareness about HR topics (disability, co-opting, etc.). The event was topped off by a moment of relaxation over a good dinner in a nice venue.

Employees of Freebox, Trax, and iliad's head office entities enjoyed a family event this summer, with the Free Kids Summer Party. The event featured creative workshops and outdoor games to the delight of parents and kids alike.

Participation in sports challenges within the Group and between entities is a way for our employees to share a common passion or simply to get involved in a day for solidarity. Events included the Maif Ekide relay race, the Adidas 10 km race and soccer with Sport dans la Ville.

4.3.3.3 Results and indicators

Absenteeism in 2022

Data on absenteeism has been broken down into two sections for 2022: "including accidents" and "excluding accidents". The absenteeism rate is based on unplanned leaves of absence, which cannot be foreseen or planned by the Group.

Group data (including Poland since 2021)	2022	2021	2020	2019	2018
Total Group absenteeism rate, excluding accidents	4.49%	5.91%	5.10%	4.97%	5.28%
Total Group absenteeism rate, including accidents	4.80%	6.72%	5.72%	5.61%	6.04%

Workplace injuries in 2022

A total of 225 lost-time occupational accidents were identified across the Group in 2022, compared with 316 in 2021 and 268 in 2020. The 2022 figure represented 1.3% of the consolidated workforce. The accidents mainly occurred in France, where 60% of the workforce is based. The accident rate was down in some subsidiaries (Centrapel, Free Mobile, Free Réseau and iliad SA),

but up slightly at Protelco, Certicall, Scaleway and iliad Italia. Overall, the figure edged up in France, but was down for the Group as a whole. In the Free Centers, 33% of accidents are related to altercations with visitors/subscribers. This was 12 points lower than in 2021. A specific procedure for preventing and managing these incidents has been put in place, and each incident is individually monitored by the Quality of Worklife Officer.

The Group carefully monitors the frequency and severity rates of occupational accidents in all of its units. In 2022, rates were as follows:

	Frequency rate – Group	Frequency rate – France	Severity rate – France
2022	5.90	12.95	0.85
2021	12.14	19.38	1.00
2020	13.93	18.24	1.04
2019	17.15	18.24	0.96
2018	31.40	41.03	1.31

In order to reduce the number of accidents in the coming years and to train our new employees, 103,611 hours of safety training were provided within the Group in 2022 (including 87,325 in France).

In line with its corporate culture, and to maintain the technical skills of its staff, iliad has always favored in-house expertise. As a result, it decided to employ its own roaming technicians and FTTH rollout/connection personnel, who are grouped within Protelco, Free Infrastructure and Free Réseau. These three entities therefore make up a large proportion of iliad's overall headcount. The specific nature of these employees' work leads to a high number of non-severe accidents, which are nevertheless carefully monitored and for which the Group provides support.

4.3.4 Quality social dialog and preservation of the Group's DNA

4.3.4.1 Policies and objectives

The iliad Group strives to "do the right thing" for future generations. This is reflected in the shift in our activities to low-carbon models, our investments and actions for environmental and social causes through the Free Foundation, and the various initiatives we take as a company. And while the iliad Group is committed in the singular, our employees are also committed in the plural. This commitment to corporate citizenship is essential to the Group's brand image, for both its commercial competitiveness and its attractiveness as an employer. To maintain this regular dialog with its employees and obtain usable quantitative feedback, the Group aims to achieve a response rate of at least 50% for its annual employee satisfaction survey.

4.3.4.2 Actions implemented

Commitment to the environment

The climate crisis going back several years is intrinsically linked with complex economic and social challenges. iliad Group employees all nevertheless share the firm belief that change can begin at the individual level. From the sum of these individual convictions, collective actions for the preservation of the planet and the protection of biodiversity are born daily.

Examples

Throughout the Group, European Sustainable Development Week from September 18 to October 8, 2022 was a chance to put a focus on environmental and biodiversity issues. An internal talk was held on October 6 to review progress on our climate commitments.

Climate Fresco collaborative workshops were also held in Paris and regional cities to help provide employees with a better understanding of the challenges of global warming.

The workshops are in small groups of five to fourteen people. Supervised by an expert facilitator, they give rise to the creation of an educational mural setting out the various factors and interactions at play. The workshops leave participants well-armed to find practical initiatives.

The energy efficiency plan implemented by the iliad Group in 2022 is ambitious and requires full commitment from our employees. Some measures, like the optimization of the tools used to control our air treatment facilities or the installation of new energy management systems to better control consumption on our sites, require our employees to be fully on board, especially in stores. Free Distribution helped win employees over to the cause with dedicated coaches and training for electrical modifications and on air conditioning. Another measure was the provision of down jackets to Free Center advisors to make up for the reduction in temperatures in stores.

An energy saving awareness plan has also been rolled out for all of employees. It features on-site displays at the Group's Paris headquarters and "GreenTips" newsletters in Italy.

Lastly, the iliad Group is committed to the switch to soft mobility. Free Proxi responds to this challenge by making its regional footprint central to its organization. Our goal is to reduce distances so as to offer our employees alternative means of transportation to cars – whether to get to their workplace or to our subscribers' homes – and as such to avoid their related emissions. We therefore encourage our teams in cities to use public transportation.

To further reduce our emissions within the Free Proxi scope, we have begun equipping our teams with electric vehicles and electric bicycles for work in our subscribers' homes. The project is ongoing, and our goal is for all local teams to be equipped as quickly as possible.

Equaline employees have access to a repairperson who comes to the call center twice a year to diagnose and repair bicycles for all employees. Recharging points are also available for electric scooters.

Commitments for people

By eschewing the dogma of diplomas, by creating local employment, by committing to recruiting and training marginalized people, by helping to ease cost-of-living constraints for French people, we have made corporate citizenship a common thread of our work. This is naturally reflected in the recurring initiatives in which our employees take part to support general interest causes.

Examples

International Women's Day falls every year on March 8. To mark it, the iliad Group hosted an inspiring talk by Clarisse Agbégnénou, double Olympic judo champion, who shared her vision of gender equality through her experience not only as an athlete, but also as a committed woman. Accompanied by five women ambassadors from our subsidiaries, she answered questions from employees and talked with them.

As it does every year during the European Disabled Employment Week, from November 14 to 18, the Group took part in the DuoDay event. This nationwide event allows a jobseeker with a disability to spend a day working as part of a duo with a volunteer employee. Several duos were formed within the Group, some lasting more than a day.

The following initiatives were particularly popular among our contact center employees:

- for Sidaction, an Aids fundraising campaign, Centrapel provided equipment and premises to collect pledges;
- charity drives are also part of daily life for Equaline, with work alongside local non-profits such as Cravate Solidaire, the SPA and Emmaüs.

With non-profit Les Entreprises de la Cité, Equaline allowed a class of students from a middle school near Bordeaux to participate in a work experience course.

Its receipt of the Empl'itude label demonstrates Free Pro's commitment to employment in the Marseille Provence area. This regional label recognizes the actions and good practices of organizations in the areas of employment, human resources and corporate citizenship.

In addition, the Free Foundation this year chose to lend its support to non-profits working to strengthen social and cultural ties in underprivileged urban areas. We rewarded initiatives calling on digital tools to create places for exchanges between the residents of underprivileged areas around cultural and artistic projects, such as the making of films or the creation of local media.

Guaranteeing respect for human rights

The Group upholds the principles of the Fundamental Conventions of the International Labour Organization (ILO) and the human rights principles set out in the United Nations' Universal Declaration of Human Rights.

Consequently, it has undertaken to (i) respect the right to freedom of association and protect the right of collective bargaining (the Freedom of Association and Protection of the Right to Organise Convention (no. 87) dated July 9, 1948, and the Right to Organise and Collective Bargaining Convention (no. 98) dated June 8, 1949); and (ii) combat all forms of forced labor and child labor (the Abolition of Forced Labour Convention (no. 105) dated June 25, 1957, and the Worst Forms of Child Labour Convention (no. 182), dated June 17, 1999).

These commitments are implemented in compliance with local regulations in the different countries where iliad operates.

We are also vigilant about respecting the principles of equality, diversity and non-discrimination, both within our Group and in our wider stakeholder ecosystem.

The Code of Ethics distributed to all employees and available on the Group intranet lists our commitments to human rights.

4.3.4.3 Results and indicators

The participation rate in the 2022 employee satisfaction survey was 59% (11,400 employees surveyed on the "France activity" scope covering employees in France and Morocco).

Employee dialog indicators	2022	2021	2020
Response rate to the annual employee satisfaction survey (France)	59%	57%	68%
Overall satisfaction rate in the annual employee satisfaction survey (France)	83%	74%	70%

4.4 CONTRIBUTING TO A USEFUL, RESPONSIBLE AND TRUSTED DIGITAL WORLD

With more than 16,000 employees serving nearly 46 million subscribers in Europe, the iliad Group has a major responsibility towards society.

As a leading economic player, the Group must first and foremost guarantee exemplary business conduct. Whether in terms of business law, citizens' rights or relationships with our suppliers, we are committed to a process of continuous improvement in our compliance standards.

As an actor in the digital revolution, iliad has always been committed to defending consumer rights, whether that means allowing them to pay a fair price for telecom service or having their personal data protected. From the outset, this approach has been embodied in militant corporate citizenship backed up since 2006 by the Free Foundation.

4.4.1 Responsible purchasing and duty of care

4.4.1.1 Policies and objectives

While we take great care to provide our subscribers with high-quality products and services, we also take into careful consideration the CSR performance of our partners and all the links in our supply chain. We have therefore put in place a responsible purchasing policy to help us meet our CSR aims while at the same time ensuring full regulatory compliance.

Sustainable development is an essential component of our purchasing policy and we give it as much importance as we do to price and quality. In practice, this means fully integrating CSR into the purchasing process. In 2022, the Group published a Partner Relations Charter setting out the principles and commitments it imposes on itself, and to which its suppliers must also adhere. The objectives are to:

- strengthen CSR practices in dealings with our partners;
- improve the Group's social and environmental performance by selecting virtuous and committed partners;
- contribute to risk management by assessing the external effects of the products or services offered.

4.4.1.2 Actions implemented

Guaranteeing a responsible purchasing policy

The iliad Groups is a signatory of the United Nations Global Compact with the objective to develop partnerships that contribute to the UN Sustainable Development Goals (UN SDGs) - SDG 17. In addition, we constantly strive to protect the health and safety of our customers. Lastly, we are gradually shifting our vehicle fleet toward electric vehicles.

Certifying our suppliers and service providers (EcoVadis ISO 26000 standard)

Sharing common values is essential to building and maintaining lasting partnerships and business relations. This is why our policy is to involve stakeholders in a continuous assessment and improvement approach that aims to deliver outstanding performance in key issues, including business ethics, environmental protection and respect for labor and human rights.

We assess the CSR performance of a group of strategic suppliers that work in the most sensitive fields, selected based on our risk map. The selection covers the Group's various purchasing units and concerns activities such as supply chain management, network rollouts and device procurement.

In 2018, the Group selected an initial group of strategic suppliers. It also laid down assessment criteria and created a dedicated platform. The assessments are conducted by a specialized firm, EcoVadis, whose review methodology is based on ISO 26000. Suppliers are selected for review based on an ethical and non-compliance risk map, combining criteria such as the supplier's industry, regional location and business volumes, as well as indices defined by leading NGOs (e.g., Transparency International's Corruption Perceptions Index). In 2020, we developed a proprietary supplier management system designed to facilitate our relationship with these stakeholders and to track their CSR performance, in particular.

4.4.1.3 Results and indicators

At the end of 2022, 382 suppliers in France and Italy had been assessed by EcoVadis, our service provider. The Group plans to extend this analysis to Poland from 2023.

	2022	2021	2020
% of new suppliers and providers undertaking to respect our ethical principles	100%	100%	ND
% of expenditure in France and Italy assessed by EcoVadis	40%	50%	ND
% of assessed suppliers to have implemented an anti-corruption policy	77% (new indicator)	ND	ND

4.4.2 Ethics in business and commercial practices

4.4.2.1 Policies and objectives

The business environment is constantly changing, and becoming increasingly demanding in terms of ethics and compliance. In that spirit, ethical conduct and compliance are absolute prerequisites at iliad, throughout our organization and at all levels.

Our ethical principles inform all of the Group's activities, including relationships with external partners and stakeholders (subscribers, service providers, employees, etc.), which are themselves becoming increasingly focused on these issues.

We have adopted a strict ethics and compliance policy, not only to meet the requirements of increasingly stringent regulations, but also to prevent any non-compliance and reputational risk, especially in terms of corruption. To that end, our main goal is to maintain a rate of 100% of employment contracts signed with the Code of Ethics.

Code of Ethics

The Group's Code of Ethics, whose latest version was published in 2021, sets out the Group's values and business ethics principles. The Ethics & Compliance department has also issued a new Anti-Corruption Code of Conduct. Designed for the Group's employees, this Code provides a clear framework for them to make the right choices and take the right steps when faced with risks of corruption. It includes a number of illustrative examples of situations that employees could encounter in their job and how they should behave in those situations. It is a succinct, go-to-guide that can also be given to any business partner. These documents are adapted to local regulations for the Group's international subsidiaries.

An Ethics & Compliance section is available in French and English on the Group's corporate website and its intranet portal. It gives all employees access to ethics policies and procedures at all times.

Gifts and invitations

Although giving and accepting gifts, invitations and signs of hospitality may be commonplace in the world of business, the practice may carry risks that all of our staff members know how to identify and avoid. In order to prevent these risks and ensure that everyone makes the right choices, the Group has set up a system for disclosing and monitoring gifts and invitations, and communicates widely about the best practices to adopt. In 2021, the Group published a Gifts and Invitations brochure and updated the related electronic disclosure system. After being compiled and analyzed, the gift and invitation disclosures are used in the annual review of iliad's risk map to update operational factors.

Whistle-blowing system

This system is a procedure put in place by the Group to enable its employees, as well as external and occasional partners, to bring to the attention of the Compliance department any behavior or situation that may be contrary to the iliad Code of Ethics (relating to topics such as respecting human rights and fundamental freedoms, combating corruption and influence peddling, or financial, accounting or tax irregularities). Such disclosures allow the Group to put a stop to any inappropriate behavior and impose sanctions where necessary. Its scope of application is described in the whistle-blowing procedure available at **https://alerteethique.iliad.fr**./

In 2022, the iliad Group updated its ethics whistle-blowing system and website in accordance with the Waserman law and its implementing decree, thereby improving the protection of whistle-blowers. A whistle-blowing system has also been set up in the Group's international subsidiaries, in accordance with local regulations.

4.4.2.2 Actions implemented

Governing and managing ethical risks

With a view to making the Group and its subsidiaries standard-setters in ethics and compliance, iliad's management plays a driving role in defining and implementing a zero-tolerance ethics and compliance policy, based on the "tone at the top" principle in France, Italy and Poland.

The commitment of iliad's management team is further demonstrated by:

1) the active promotion of business ethics principles;

2) the creation of a function dedicated to compliance issues. In 2018, the General Counsel's department set up an ethics and compliance program and appointed a Chief Ethics & Compliance Officer in charge of developing and implementing the program and monitoring the effectiveness of the measures taken. In 2022, a position of Compliance Director was created, reporting both to the Finance Department and the Group's General Counsel. Since the creation of this function, the number of people dedicated to compliance tasks has increased. This trend is backed up by the implementation of compliance programs dedicated to certain activities (network rollout) and certain Group entities (notably Stancer, a banking institution whose activity is regulated by the ACPR);

3) the participation of some of its members in the ethics committee, an Executive Management committee tasked with defining the main tenets of the Group's ethics policy and reviewing its compliance program.

Code of Ethics

All iliad Group employees are kept regularly informed of the content of ethics documentation through internal communications. This documentation is also given to them in person when they take up their position and is available at all times on the corporate website and on the Group's intranet. All new employment contracts refer to the Code of Ethics, which is appended to the Company's Internal Rules. Ethics news is also published on the Group's corporate website. The Code of Ethics and the Anti-Corruption Code of Conduct are both freely accessible there.

Training our teams

An awareness-raising and training plan has been developed on preventing ethics and compliance risks. Its main objective is to spread a culture of compliance within the Group and to reiterate the principles enshrined in the Code of Ethics.

To best cover the diversity of profiles exposed to these risks within the Group, the plan provides for several training modules in face-to-face, videoconference and e-learning formats.

The scenarios proposed are adapted to the various participants' activities. They are based on situations reflecting the Group's risk mapping and operational challenges.

This training is available in France, Italy and Poland so as to cover all country-based regulatory specificities. As well as being annually updated, the modules are revised whenever there is a substantial change in Group policy or the legal and regulatory context.

Controlling ethics risks

The risks and uncertainties of which the Group is currently aware and which it considers to be material are described in Chapter 4, Section 4.1.5.3 of this Universal Registration Document – Risk factors.

The Group's corruption risk mapping process consists of identifying, assessing, prioritizing and managing the corruption risks inherent in its activities.

It involves analyzing business processes at all levels of the Group, within each subsidiary and activity. This means that corruption risks are identified and assessed in consultation with representatives of the activities concerned.

This map is a guide for the Group's Executive Management when drawing up the compliance program. It also helps to guarantee that the Compliance Program is suited, proportionate and effective.

Taking the form of structured documentation, the corruption risk map provides an overview of internal and external corruption risks for everyone involved in implementing the related corrective measures, including members of the Ethics Committee and the CEOs of the Group's subsidiaries. Actions tailored to the desired outcomes are being deployed with the goal of preventing, mitigating and eliminating any risk of non-compliance.

Whistle-blowing system

For employees, the whistle-blowing system represents an alternative to the traditional route of informing line management. It is not compulsory but employees are recommended to use it so that they can be covered by the legal protection provisions applicable to whistle-blowers. The way the system works and how whistle-blowing alerts are handled are described in a plain-language video on the home page of the dedicated whistle-blowing site.

Statistical monitoring is also carried out on the processing of whistle-blowing alerts as part of a continuous improvement process and in the interests of transparency.

4.4.2.3 Results and indicators

In 2022, more than 570 employees took the Anticorruption – Sapin II training in France, 976 in Poland and 720 in Italy.

	2022	2021	2020	2019
Employment contracts signed with Code of Ethics (appended to the internal regulations)	100%	100%	100%	100%

4.4.3 Contribution to responsible and secure digital technology

Digital technology is playing an increasingly important role in all aspects of our everyday lives, impacting our lifestyles on so many levels – at home, in our families, at school, at work, in our wellbeing and in our entertainment choices. It is also transforming an ever-growing array of industries, from automobiles and energy to home automation, healthcare, financial services and retailing.

The business model of major Internet companies is based on monetizing data that they collect and cross-reference using innovative solutions leveraging Big Data and, increasingly, artificial intelligence. Against this backdrop, users, i.e., citizens, have very high expectations in terms of the quality and reliability of telecom networks and the protection of their personal data, which means they need to have a relationship of trust with their operator.

4.4.3.1 Cybersecurity, the fight against external attacks and network resilience

4.4.3.1.1 Policies and objectives

Faced with the mounting number of cyberattacks, the Group has intensified its focus on the protection of its information systems. The Group attaches the utmost importance to the security and confidentiality of its subscribers' and employees' personal data. This major concern has resulted in defining choices for:

- fixed and mobile telephony and Internet access activities;
- subscriber management platforms;
- human resources tools.

The Group's cybersecurity policy is based above all on the choice of trusted technical partners, in-house oversight of critical equipment and the encryption of the various accesses (wireless encryption, remote VPN access). The Group has also implemented an information systems security policy (ISSP),

which is regularly updated. The Group aims to train at least 15% of the workforce of its French subsidiaries on cybersecurity each year.

4.4.3.1.2 Actions implemented

Our exacting standards are clearly illustrated in the fact that:

- the Group's strategic equipment manufacturers are all based in Europe or form part of the Group (Freebox);
- wireless connections are always encrypted using the latest algorithms;
- oversight and operation of equipment is carried out in-house with secure, authentication-based access control;
- subscriber relations platforms are managed internally at Group level by dedicated structures to ensure that personal data is not relayed to external parties;

4.4.3.1.3 Results and indicators

In 2022, 1,700 employees in France completed e-learning on cybersecurity. Since 2020, over 8,000 employees of French subsidiaries have received training on these issues.

- the Group prefers to develop its information systems in-house;
- access to databases containing subscribers' personal information systematically requires authentication, with hierarchical access levels;
- all actions on information systems and equipment are traced;
- the policy for creating and storing passwords for accessing subscriber areas is regularly updated in line with security requirements;
- website encryption protocols adhere to the best recommendations.

To make sure that its employees fully understand these issues, the Group has set up a specific training plan and provides them with appropriate support systems.

	2022	2021	2020
Number of employees of French subsidiaries receiving cybersecurity training	1,700	4,809	1,808
% of the average workforce of French subsidiaries over the year	17%	51%	20%

4.4.3.2 Privacy, confidentiality and freedom of expression and contribution to digital responsibility

4.4.3.2.1 Policies and objectives

Protecting personal data is a priority for iliad. Personal data management is an intrinsic part of the Group's activities, which are governed by European regulations and the national laws of the countries where the Group operates. The collection of personal data, their use and their storage imply compliance with the applicable regulations, including European regulation 2016/679 of April 27, 2016 on the protection of personal data, which came into force on May 25, 2018 (the "GDPR"). Certain breaches of the law can result in administrative fines of up to €20 million or 4% of annual worldwide revenues, whichever is higher.

The security of personal data is another important issue. Personal data, especially those of customers, are exposed to the risk of loss of confidentiality, unauthorized modification or involuntary deletion, particularly in the event of a cyberattack.

The content hosting activity also entails compliance with applicable regulations regarding the removal of illegal content. On the subject of content, another of our priorities is to guarantee the protection of vulnerable populations. Free has designed and put in place a number of different solutions aimed at protecting vulnerable populations from inappropriate content.

Lastly, the laws applicable in the countries where the Group operates may impose the obligation to comply with injunctions and/or requisitions from local authorities. iliad must ensure

compliance with the requisite legal and regulatory formalities in order to preserve the rights and freedoms of individuals, in particular the freedom of expression.

iliad strives constantly to improve its compliance in all areas so as to make the protection of personal data a major asset in its market. The Group has set itself the objective of training at least 20% of the average workforce of its French subsidiaries on the subject of personal data protection each year.

4.4.3.2.2 Actions implemented

In 2022, iliad continued its work to ensure compliance with personal data protection regulations. Our exacting standards are clearly illustrated in the fact that:

- we have created a team to back up the DPO;
- a GDPR Committee has been established for the French subsidiaries in order to spread best practices and report questions;
- an international working group is working to harmonize our best practices at Group level;
- online personal data training is mandatory;
- the tool for managing the processing register has been modernized;
- the procedure for managing requests for removal of any illegal content hosted has been improved;
- a parental PIN for protecting vulnerable populations is in place;
- processes related to information systems have been improved;
- the DPO team provides ongoing support for all Group projects involving personal data.

In the field of protection of vulnerable populations, Free has added a parental PIN system to its television interface for their protection. The PIN is set in the subscriber's online personal space, which only the adult holder of the subscription can access using his or her user name and password. Concerning Internet access, the FreeboxOS (for computers) and the Freebox Compagnon application (for mobile phones) contain a parental control service that can be set up and configured remotely and in real time. Additionally, Freebox subscribers can use a WiFi planning function to enable or disable their WiFi service at specified times.

4.4.3.2.3 Results and indicators

In 2022, 1,950 employees in France completed e-learning training on personal data protection. Since 2020, over 10,000 employees of French subsidiaries have received training on these issues.

	2022	2021	2020
Number of employees of French subsidiaries receiving cybersecurity training	1,950	3,163	5,155
% of the average annual workforce of French subsidiaries receiving training on personal data protection	20%	34%	58%
% of countries where the iliad Group operates with a DPO	100%	100%	100%
% of Freebox subscribers to have activated the parental control system	6%	6%	6%

4.4.3.3 Network quality, regional coverage and service proximity

4.4.3.3.1 Policies and objectives

The iliad Group grew out of the conviction that digital technology is a formidable vector of personal and professional opportunities and must be accessible to as many people as possible.

This belief has taken shape on three strategic pillars:

- designing simple products and providing affordable offers for everyone;
- giving everyone, wherever they live, equal access to digital technologies and products through a policy of sustained investment in the rollout of equipment and infrastructure throughout the country;
- building an open and committed company that supports digital inclusion and training for its employees and society as a whole. This strategic pillar is set out in section 4.4.3.4 (Innovation accessible to as many people as possible).

4.4.3.3.2 Actions implemented

Unbundling as a matter of course in our committed policy

Very quickly, iliad came to see local loop unbundling in France as a tremendous source of growth and a tool for increasing access to the Internet. Since 2003, Free's fixed-line Internet offer in France has been simple and affordable: the operator has never imposed a minimum commitment on its subscribers (September 2002), it was the first to offer unlimited voice calls both to fixed lines in France (July 2003 for unbundled subscribers, then March 2004 including non-unbundled subscribers) and to mobiles (December 2010), and offers the same price to its subscribers, whether or not they are in unbundled areas (Free's costs being significantly higher outside unbundled areas), while constantly enriching its offer without raising the price (€29.99 since 2002 with greater speed, more free TV channels, more telephony and more value-added services). **This strategy of not distinguishing between its subscribers depending on where they live has required considerable investment, which has had an impact on the Group's margins over time given the inherent imbalance in profitability of selling its offers at a fixed price regardless of where subscribers are located.**

The rollout of fiber (FTTH) is replicating the philosophy underpinning our copper strategy

In 2006, the Group embarked on a long and costly phase of investment in optical fiber to the home (FTTH) in France. Free's fiber rollout and its pricing strategy demonstrate the operator's determination to offer equal access to digital technologies throughout France. While most of our competitors charge subscribers a higher price for an FTTH connection or for Orange's copper pair, Free opted from the very outset to offer the same price regardless of the technology chosen by the subscriber. To provide its fiber offers to as many customers as possible, and in accordance with the regulatory framework set out by ARCEP, Free began investing in FTTH in high-density areas on its horizontal network in 2006, and has almost systematically co-financed investments in the vertical network. Investissement dans la fibre des territoires (IFT), a joint venture set up in 2020 with InfraVia, was created to pursue its strategy of providing equal access across the country, outside very densely populated areas.

The launch of Free Mobile, a lesson in reducing the cost of living

As soon as it obtained a 3G telephony license in 2010, Free Mobile turned the market codes upside down by launching unbeatably priced offers in January 2012. We estimated at the time that the €2 package offering 60 minutes of calls and 60 texts per month was priced at less than a quarter of the cheapest rival offer on the market. And while the price is still the same, the service has been enriched: it now includes 120 minutes of calls per month, unlimited SMS/MMS and 50 MB of 4G/4G+ mobile Internet. The €19.99 per month offer launched with unlimited calls, SMS, MMS and Internet was considered 60% cheaper than the cheapest rival offer on the market. The price has not changed here either, but the offer has again been enriched to include 5G (unlike some of our competitors, which impose a premium for

new technologies, as they have for fiber). In Italy, the Group has adopted the same approach. After obtaining the remedies linked to the merger between Wind and Tre, iliad launched iliad Italia and unveiled transparent, simple offers accessible to everyone.

Free Proxi and our networks, the perfect combination for a local service

Free Proxi is the new local assistance service created by Free for its subscribers, delivered by small, locally based teams of 8 to 10 Free advisors, who are readily available online to answer any questions about Freebox and Free Mobile plans. Thanks to their local presence, the Free Proxi teams have detailed knowledge of their region's fixed and mobile network infrastructure. They can easily troubleshoot possible incidents,

and even go directly to the subscriber's home to restore service or replace a device. In this way, subscriber issues can be handled from start to finish by the same team, and sometimes by the same advisor. Free Proxi is included in all the Free plans. As soon as they are eligible, subscribers contacting support are put in touch directly with their Free Proxi team. They can directly access their advisors in their subscriber area via the mobile app or online, or else by phone at 3244. Available seven days a week from 8am to 9pm, Free Proxi teams are committed to offering subscribers a solution within 15 minutes. Launched in late 2019, Free Proxi is already staffed with 67 local teams based throughout France, covering 25% of its 21 million fixed-line and mobile subscribers. The goal is to have 150 local teams in place by the end of 2023, covering 50% of the subscriber base.

4.4.3.3.3 Results and indicators

The iliad Group has long considered the rollout of its own infrastructure as a virtue. It is synonymous with independence, differentiation and innovation. It is a guarantee of network quality and reflects our determination to cover the entire country. In 2022, iliad invested €2.1 billion Group-wide.

	2022	2021	2020
% coverage of the population with 5G in France	88%	79%	-
% coverage of the population with 4G in France	> 99%	99%	98%
Number of households covered by Free Fiber in France	31.3 million	25.5 million	19.9 million
% of total premises in France that can be connected to Free Fiber	92%	85%	89%
Number of active new 4G mobile sites rolled out in France	2,206	2,603	3,890
Number of active new 4G mobile sites rolled out in Italy (before impact of network sharing with Wind Tre)	1,593	2,612	4,053
% of French revenues devoted to investments	26.6%	32.2%	26.2%
% of Italian revenues devoted to investments	42.7%	51.4%	76.0%
% of Polish revenues devoted to investments	14.0%	12.4%	17.0%

Launched in late 2019, Free Proxi is already staffed with 67 local teams based throughout France, covering 25% of its 21 million fixed-line and mobile subscribers. The goal is to have 150 local teams in place by the end of 2023, covering 50% of the subscriber base.

4.4.3.4 Innovation accessible to as many people as possible

4.4.3.4.1 Policies and objectives

Founded in 2006, the Free Foundation has been combating the digital divide for 16 years, providing a powerful illustration of the Group's commitment to its people and society as a whole. Acting in complete independence, the Foundation works to promote digital inclusion projects throughout the country, a more responsible digital environment and open-source software. It now wields internal and external influence benefiting a very great number of people. The Foundation's goal is to provide support to at least 10 projects each year.

4.4.3.4.2 Actions implemented

Financial support for non-profits specializing in digital technology through calls for projects and partnerships

Since its creation, the Foundation has provided support for more than 370 projects. To respond to emerging issues in the fight against the digital divide or the promotion of a more responsible

digital environment, the Foundation provides financial support to non-profits selected on the basis of calls for projects issued regularly. Each call focuses on a social issue for which digital tools offer leverage.

Once a call for proposals closes, the Foundation's team reviews each project before pre-selecting the best applications. The projects are then pitched before a selection committee of iliad Group employees, which meets to make the final decision.

The Foundation also forges lasting partnerships with non-profits working on digital inclusion programs for young people. The Innov'Avenir program is a prime example. Supported by Les Entreprises pour la Cité, this nationwide digital inclusion program seeks to combat the new forms of inequality that have emerged in the wake of the digital revolution. The project works primarily with young people in underprivileged urban areas. Inspired by the notion of equal opportunity, it aims to give each young person the means to their find place in society and in the professional environment.

Support for the open-source world

Since its inception, and in keeping with iliad's DNA, the Foundation has also supported the open-source software community. It provides servers for 14 open-source non-profits such as "My Human Kit", which invents, makes and shares technical assistance solutions for, and with, people with disabilities.

Encouraging the reuse and recycling of mobile phones

The Foundation supports the fight against digital pollution and global warming by taking practical measures to extend product lives and to encourage the recycling of mobile phones. Its actions in this area target both Group employees and Free subscribers.

Employee engagement

The Foundation also aims to encourage and support the involvement of iliad Group employees in non-profits or charitable initiatives. Various dedicated programs are now in place.

4.4.3.4.3 Results and indicators

Financial support for non-profits specializing in digital technology through calls for projects and partnerships

The 2022 call for projects, "Connect, cultivate… bring together!", rewarded the initiatives of non-profits calling on digital tools to create places for exchanges between the residents of underprivileged areas around cultural and artistic projects, such as the making of films or the creation of local media.

The field of culture, and more particularly entertainment, was hit hard by the health crisis. While individual practices (video, video games, etc.) enjoyed a real boom, collective projects – those that create social ties, like the performing arts, concerts and audiovisual production – fell by the wayside. That is why the Free Foundation has chosen to lend its support to non-profits working to strengthen social and cultural ties in underprivileged urban areas. The 2022 call for projects rewarded initiatives calling on digital tools to create places for exchanges between the residents of underprivileged areas around cultural and artistic projects, such as the making of films or the creation of local media.

Support for the open-source world

The Foundation provides servers for 14 representatives of the open-source software community.

Encouraging the reuse and recycling of mobile phones

Drop-off boxes have now been put in place in all Free stores, where people can leave their used phones or accessories. Their discarded equipment is then reconditioned or recycled in French channels, in partnership with Les Ateliers du Bocage, members of the Emmaus movement, which employs people marginalized in the job market or people with disabilities. More than 80% of the phones collected have been reconditioned and will be resold to people in need or to non-profits at very affordable prices thanks to the Solidatech program.

Rounding wages

Rounding their pay is a way for employees to donate a few cents to a non-profit. Their company doubles the cents donated, and those wanting to can add between €1 and €10 extra every month. The Foundation has implemented this system in five Group entities with the help of Human Resources departments.

Skills volunteering

The iliad Group and the Free Foundation encourage solidarity among their employees and since 2021 have been running a skills-volunteering platform allowing willing employees to donate their time. The program allows all Group employees to get involved with non-profits throughout France, either online or in person, for anywhere from a few hours to several months.

The Cohesion program

The Cohesion program is an internal call for projects that encourages the goodwill and personal investment of iliad Group employees by providing support for their non-profit projects in the digital field.

Free Foundation projects

The charities and other non-profit organizations we support have very diverse needs and the amounts of funding we provide vary widely. Since its creation in 2006, the Free Foundation has provided support for over 300 projects. In mid-2022, the Free Foundation's organization underwent changes resulting in a reduction in the number of projects that received financial support this year to 11, from 21 in 2021 and 19 in 2020.

4.5 REPORT BY ONE OF THE STATUTORY AUDITORS, APPOINTED AS AN INDEPENDENT THIRD PARTY, ON THE CONSOLIDATED NON-FINANCIAL INFORMATION STATEMENT

(For the year ended December 31, 2022)

To the Shareholders,

In our capacity as Statutory Auditor of iliad SA (hereinafter the "entity"), appointed as an independent third party ("third party") and certified by COFRAC (Cofrac Inspection Accreditation n°3-1862, whose scope is available at www.cofrac.fr), we conducted our work in order to provide a report expressing a limited assurance conclusion on the historical information (observed and extrapolated) in the consolidated non-financial information statement, prepared in accordance with the entity's procedures (hereinafter the "Guidelines"), for the year ended December 31, 2022 (**hereinafter respectively the "Information" and the "Statement"**), included in the Group management report pursuant to the legal and regulatory provisions of Articles L. 225-102-1, R. 225-105 and R. 225-105-1 of the French Commercial Code *(Code de commerce)*.

Conclusion

Based on the procedures performed, as described in the "Nature and scope of our work" section, and the elements that we have collected, nothing has come to our attention that causes us to believe that the consolidated non-financial information statement is not compliant with the applicable regulatory provisions and that the Information, taken as a whole, is not presented fairly in accordance with the Guidelines.

Preparation of the non-financial information statement

The absence of a generally accepted and commonly used framework or established practices on which to evaluate and measure the Information permits the use of different, but acceptable, measurement techniques that may affect comparability between entities and through time.

Consequently, the Information needs to be read and understood with reference to the Guidelines, which are available upon request from the entity's headquarters.

Inherent limitations in preparing the Information

As indicated in the Statement, the Information may be subject to inherent uncertainty because of incomplete scientific and economic knowledge and due to the quality of the external data used. Certain Information is sensitive to the methodological choices, assumptions and/or estimates used to prepare the Information presented in the Statement.

The entity's responsibility

Management is responsible for:

- selecting or establishing suitable criteria for preparing the Information;
- preparing the Statement in accordance with the legal and regulatory provisions, including a presentation of the business model, a description of the principal non-financial risks, a presentation of the policies implemented considering those risks and the outcomes of those policies, including key performance indicators and the information required by Article 8 of Regulation (EU) 2020/852 (green taxonomy); and
- preparing the Statement in accordance with the entity's Guidelines as mentioned above; and
- implementing internal control over information relevant to the preparation of the Information that is free from material misstatement, whether due to fraud or error.

The Statement was prepared by the Board of Directors.

Responsibility of the Statutory Auditor, appointed as an independent third party

On the basis of our work, our responsibility is to provide a reasoned opinion expressing a limited assurance conclusion on:

- the compliance of the Statement with the provisions of Article R. 225-105 of the French Commercial Code;
- the fairness of the historical information (observed and extrapolated) provided in accordance with 3° of Article R. 225-105 I and II of the French Commercial Code, i.e., the outcomes, including key performance indicators, and the measures implemented considering the principal risks.

As we have been engaged to form an independent conclusion on the Information as prepared by management, we are not permitted to be involved in the preparation of the Information as doing so may compromise our independence.

It is not our responsibility to comment on:

- the entity's compliance with other applicable legal and regulatory provisions (in particular the information required by Article 8 of Regulation (EU) 2020/852 (green taxonomy), the French duty of care law and anti-corruption and tax evasion legislation);
- the fairness of the information required by Article 8 of Regulation (EU) 2020/852 (green taxonomy);
- the consistency of products and services with the applicable regulations.

Applicable regulatory provisions and professional standards

The work described below was performed in accordance with the provisions of Articles A. 225-1 *et seq.* of the French Commercial Code and with the professional guidance of the French Institute of Statutory Auditors (*Compagnie nationale des commissaires aux comptes*, "CNCC") applicable to such engagements, in particular the *Compagnie nationale des commissaires aux comptes* technical opinion, *Auditor engagements – Third Party engagements – non-financial information statement*, and with ISAE 3000 (Revised) – *Assurance engagements other than audits or reviews of historical Financial Information*.

Independence and quality control

Our independence is defined by the provisions of Article L. 822-11 of the French Commercial Code and the French Code of Ethics (*Code de déontologie*) of Statutory Auditors. In addition, we have implemented a system of quality control including documented policies and procedures to ensure compliance with the ethical requirements, French professional guidance and applicable legal and regulatory requirements.

Means and resources

Our work was carried out by a team of five people between October 2022 and March 2023 and took a total of six weeks.

We were assisted in our work by our specialists in sustainable development and corporate social responsibility. We conducted 26 interviews with people responsible for preparing the Statement, including from the CSR, Compliance, Human Resources, Health and Safety, Environmental and Purchasing Departments.

Nature and scope of our work

We planned and performed our work considering the risk of material misstatement of the Information.

We consider that the procedures we performed based on our professional judgment allowed us to express a limited assurance conclusion:

- we obtained an understanding of all the consolidated entities' activities, and the description of the principal risks;
- we assessed the appropriateness of the Guidelines with respect to their relevance, completeness, reliability, objectivity and understandability, with due consideration of industry best practices, where appropriate;
- we verified that the Statement includes each category of social and environmental information set out in Article L. 225-102-1 III, as well as information regarding compliance with human rights and anti-corruption and tax evasion legislation;
- we verified that the Statement presents the information set out in Article R. 225-105 II where relevant to the principal risks and, where necessary, includes an explanation for the absence of the information required under Article L. 225-102-1 III, 2;

- we verified that the Statement presents the business model and the principal risks associated with the entity's activities, including where relevant and proportionate, the risks associated with their business relationships and products or services, as well as their policies, measures and the outcomes, including key performance indicators related to the principal risks;

- we referred to documentary sources and conducted interviews to:

  - assess the process used to identify and confirm the principal risks and the consistency of the outcomes and the key performance indicators used with respect to the principal risks and the policies presented, and

  - corroborate the qualitative information (measures and outcomes) that we considered to be the most important presented in the appendix. For certain social risks (e.g. relaying ethical commitments, ensuring responsible management of the supply chain, guaranteeing data protection, promoting digital access for all), our work was carried out at parent entity level; for other risks, work was carried out at parent entity level and in a selection of entities: Free Mobile, Free Réseaux, Play Group, iliad Italy, Resolution Call, Equaline and Scaleway;

- we verified that the Statement covers the scope of consolidation, i.e., all the companies included in the scope of consolidation in accordance with Article L. 233-16 within the limitations set out in the Statement;

- we gained an understanding of the internal control and risk management procedures the entity has put in place and assessed the data collection process implemented by the entity to ensure the completeness and fairness of the Information;

- for the key performance indicators and other quantitative outcomes that we considered to be the most important presented in the appendix, we implemented:

  - analytical procedures to verify the proper consolidation of the data collected and the consistency of any changes in those data,

  - tests of detail, using sampling techniques, in order to verify the proper application of the definitions and procedures and reconcile the data with the supporting documents. This work was carried out at parent entity level and in a selection of contributing entities: Free Mobile, Free Network, Play Group, iliad Italy, Resolution Call, Equaline, Scaleway, and cover between 68% (for social data), 76% (for environmental data) and 100% (for data prepared directly at the group level) of the consolidated data selected for these tests;

- we assessed the overall consistency of the Statement based on our knowledge of all the consolidated entities included in the scope of consolidation.

The procedures performed in a limited assurance engagement are less extensive than those required for a reasonable assurance engagement performed in accordance with the professional guidance of the CNCC; a higher level of assurance would have required us to carry out more extensive procedures.

Signed in Neuilly-sur-Seine, March 31, 2023

One of the Statutory Auditors
PricewaterhouseCoopers Audit

Thierry Leroux   Aurélie Castellino-Cornetto
Partner   Sustainable Development Director