

Thus, in 2025, the subsidiary in Morocco entered into a contract with a new service provider and other subsidiaries that already had contracts in force launched a request for proposal to meet all the requirements.

4.2.3.2.3.3 Improving waste recovery and treatment processes

The recovery process improvement plan aims to strengthen and improve the reliability of the recovery of electronic equipment and batteries, while ensuring the compliance and consistency of the data collected. It includes the following processes:

- operational needs assessment: Orange has to identify obsolete materials and plan marketing and sales launches of new equipment. Managing customer equipment recovery and replacement requests, tracking contract terminations and optimizing storage space in warehouses are also critical;
- network maintenance and renewal: Orange has to monitor innovations in the telecom sector and comply with regulatory obligations. For example, the national plan to decommission copper in France by 2030 requires planning for the decommissioning of copper cables, which will lead to a significant increase in the tonnage of cables to be upgraded;
- ecosystem management: it is crucial to identify recovery and treatment providers, and to adapt actions according to the local regulatory framework. Orange ensures the conformity and homogeneity of the data collected by adopting an internal data repository shared by all Group entities. In Europe, this reference system has been aligned with the classification under European Union list 2000/532/EC1;
- improved recovery processes: Orange has to work with all the Group's stakeholders (*supply chain*, logistics teams, external recovery service providers, including manufacturers, refurbishers and recyclers) to improve the processes of refurbishment and reuse of customer and network equipment, and to enhance equipment testing to ensure that it is no longer reusable before it is categorized as waste.

4.2.3.2.3.4 Cooperating with service providers, our peers and European organizations to improve waste management processes

In 2024, Orange added a clause in contracts with service providers to ensure that they comply with the CSRD requirements for waste reporting.

Orange is actively contributing to the revision of the WEEE Directive and to the definition of future European texts, in particular to harmonize waste recovery and treatment practices within the European Union, in alignment with its peers.

A working group is being created within the JAC on waste management processes in the Africa & Middle East region.

4.2.3.3 E5: Targets and metrics

4.2.3.3.1 E5-3 – Targets related to resource use and circular economy (linked to resource inflows)

Orange carried out a qualitative and quantitative analysis of resource use for the first time in 2025. It is therefore too soon to set targets linked to resource inflows as part of its 2025 sustainability statement.

Regarding the circular economy, Orange does not provide targets associated with entity-specific metrics as disclosed in Section 4.2.3.3.5 *E5 – Entity specific – Circular economy*.

4.2.3.3.2 E5-3 – Targets related to resource use and circular economy (linked to waste)

Orange complies with European regulations which, particularly through the WEEE Directive, set recovery and treatment targets.

Orange is implementing a new monitoring metric to ensure that its WEEE and batteries receive the appropriate treatment in accordance with European and local regulations. Orange's goal is to have 100% of recovered WEEE and batteries transferred to licensed treatment providers by 2030 for the Group scope. The reporting corresponding to this target will be carried out from 2026.

4.2.3.3.3 E5-4 – Resource inflows and outflows

In the absence of sector-specific standards, information focused on resource inflows is new and requires analysis based in part on the industry ecosystem to identify which products and components are material for Orange. In 2025, Orange conducted a first assessment of its impact on resources based on 2024 data.

Given the nature of the Group's business and following the double materiality analysis, biological materials and packaging are not considered material. Only flows of electronic equipment containing critical metals are modeled.

Disclosure Requirement E5-4 – Resources inflows

Resources inflows	Units	2025 Group
Total weight of equipments	Tons	12,975
Total weight of CPE	Tons	8,765
Total weight of smartphones	Tons	1,441
Total weight of Network & IT	Tons	2,769
Total weight of critical metals	Tons	3,502
Total weight of majority metals	Tons	3,495
Total weight of secondary metals	Tons	7
Total weight of metals trace	Tons	0

In 2025, the mass inflows of equipment in the modeling scope (see *MDR-M Inflows and outflows* below) amounted to approximately 13,000 metric tons, of which 68% CPE, 11% smartphones and 21% network and IT equipment.

The critical metals, including aluminum, present in this equipment are estimated at 3,500 metric tons, mainly composed of majority metals (99.8%, of which 74% for aluminum alone), with a very small proportion of secondary metals (0.20%) and trace metals (0.01%).

Initial findings from this modeling suggest a low economic risk associated with fluctuations in critical metal prices through 2030 for Orange. The main challenge lies in securing the supply of equipment, due to geopolitical issues and restrictions on exports of critical metals, especially from China. Moreover, the recovery of waste containing these metals through recycling is an opportunity to be explored in more detail.

MDR-M – Inflows and outflows

This approach, initiated for the first time in 2025, is based on updated data for physical and financial flows for 2024, as all data from the last quarter of 2025 were not yet available on the date this first version of the modeling was finalized. The continuous improvement in the data collection processes (including the automation of their processing) will make it possible to disclose inflow figures for the reporting year in 2026 or 2027.

The results of the modeling involve significant uncertainty, mainly due to the lack of data or the lack of reliable data on the metal composition of electronic equipment. To date, manufacturers are not able to provide the metal compositions of their equipment. The manufacturers themselves do not know the composition of the sub-components of their equipment sourced from their suppliers in tier n-1, n-2, etc. Orange therefore relies, in a best-case scenario, on laboratory analyses (for example, for the Customer Premises Equipment that Orange provides to the laboratory), on databases such as ADEME's, or on information gathered in the literature.

Similarly, Orange is unable to determine the share of recycled metals in inflows. However, as the cost of recycled materials is currently still higher than that of virgin materials, the proportion of recycled materials in equipment, excluding those of plastics, is negligible if not zero.

Manufacturers will be able to provide these data when regulations so require, in particular with the introduction in Europe of the Digital Product Passport (not before 2030). The assessment model will evolve over time to extend the reporting scope and reduce uncertainty with the update to metal composition assumptions when they become available.

Scope

To date, the modeling of inflows of large amounts of equipment and its metal composition covers the following scope:

- Customer Premises Equipment (CPE) = *Liveboxes*, TVs set-top boxes, Wi-Fi repeaters;
- customer devices = smartphones;
- network and IT equipment = BBUs (Baseband Units), RRUs (Remote Radio Units).

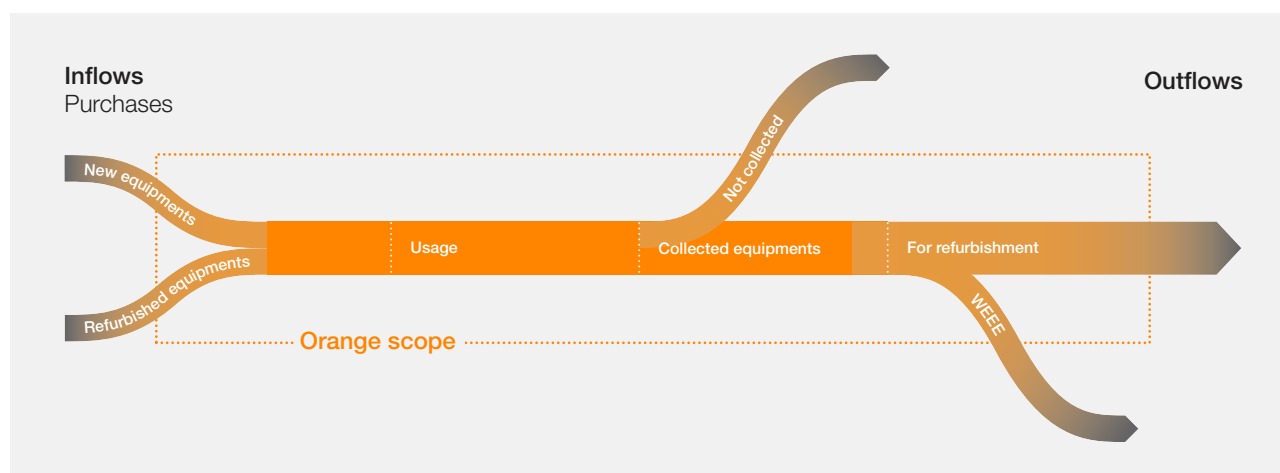
The following equipment is not covered in the scope due to the lack of data on metal composition:

- customer devices = smart TVs, Flyboxes, Airboxes, gateway satellites;
- network and IT equipment = Optical Line Terminations (OLTs), fiber optic cables, servers, switches, routers.

It should be noted that the impact of these exclusions is difficult to measure in the absence of data on metal composition from manufacturers.

Inflow modeling covers the following geographic and organizational scope: Orange France, the Europe region (outside of France), the Africa & Middle East region and Orange Business.

Modeling of inflows and outflows of critical metals



The modeling takes into account all the inflows and outflows of equipment and its metal composition as indicated in the diagram above. Only inflows classified as potentially critical for Orange are disclosed in this report.

Since the volumes of BBU and RRU inflows are not precisely known, Orange assumes that these flows are equivalent to the number of new site roll-outs in 2024 or of site redevelopments (for example, addition of 5G technology), multiplied by the average number of RRUs and BBUs per site, and depending on the supplier (Nokia, Ericsson).

The 14 metals identified as critical for Orange, plus aluminum (recognized as critical by the European Union and with high recycling potential), are classified into three categories: majority, secondary and trace.

Majority metals are aluminum, copper, silicon, lithium, cobalt and tin. Secondary metals are silver, tantalum, yttrium and gold. Trace metals are dysprosium, praseodymium, gallium, germanium and indium.

Each weight is calculated by type of equipment and by type of metal using the following formulas:

- equipment weight: units of equipment purchased × unit weight of equipment. Volumes in metric tons correspond to physical quantities recovered from Group entities. Weights are average weights for each major type of equipment;
- metal weight: units of equipment × metal composition (build of materials – BOM) of the type of equipment (in g or kg per unit of equipment). BOMs are provided by the Group's Innovation Department and are based on analyses carried out in external laboratories or on data from ADEME, the life cycle analysis database, manufacturers or any existing public source.

4.2.3.3.4 E5-5 – Waste

Waste	Units	2025							2024 com- parable basis	% N/ N-1
		France (OFR)	Rest of Europe	MEA	OB	OW	TOTEM	Group	Group	Group
Total amount by weight diverted from disposal	Tons	45,812	17,742	1,980	144	1,731	1,276	68,684	62,849	9%
Total amount of hazardous waste diverted from disposal	Tons	17,358	2,183	898	40	275	62	20,815	21,704	-4%
of which preparation for reuse	Tons	123	29	17	1	0	0	171	84	105%
of which recycled	Tons	4,350	2,028	877	11	179	61	7,506	6,448	16%
of which other recovery operations	Tons	12,884	125	4	28	96	1	13,138	15,172	-13%
Total amount of non-hazardous waste diverted from disposal	Tons	28,455	15,559	1,081	104	1,456	1,214	47,869	41,145	16%
of which preparation for reuse	Tons	-	69	111	0	-	0	179	114	58%
of which recycled	Tons	26,834	14,581	923	74	1,041	1,080	44,533	34,202	30%
of which other recovery operations	Tons	1,621	910	48	30	415	134	3,157	6,830	-54%
Non recycled waste	Tons	18,890	1,487	309	75	641	384	21,786	28,097	-22%
Non recycled waste	%	38%	8%	15%	47%	34%	25%	30%	41%	-28%
Total amount by weight directed to disposal	Tons	4,262	355	129	16	130	248	5,140	5,897	-13%
Total amount of hazardous waste directed to disposal	Tons	524	51	27	5	6	14	628	423	48%
of which incineration	Tons	32	6	27	1	0	-	66	66	1%
of which landfill	Tons	267	0	-	1	0	-	268	292	-8%
of which other disposal operations	Tons	225	45	-	3	6	14	294	65	352%
Total amount of non-hazardous waste directed to disposal	Tons	3,737	303	102	12	124	234	4,512	5,474	-18%
of which incineration	Tons	-	59	8	2	-	-	69	55	25%
of which landfill	Tons	3,737	173	95	4	124	174	4,307	5,111	-16%
of which other disposal operations	Tons	-	71	-	5	-	60	137	308	-56%
Total Waste generated	Tons	50,074	18,096	2,109	160	1,861	1,525	73,824	68,746	7%
Total amount of hazardous waste	Tons	17,882	2,234	925	45	280	76	21,443	22,128	-3%
Total amount of radioactive waste	Tons	-	-	-	-	-	-	-	-	-

The coverage rate for the reporting on waste is 82% of 2025 revenues from Orange's consolidated entities.

The year 2025 saw continuously improving waste management, characterized by an increase in tonnage evacuated, a high recovery rate, and constant efforts to optimize traceability. The actions implemented also aim to strengthen the circularity of waste and to ensure regulatory compliance, particularly in geographical areas where maturity is still under development, underlining Orange's commitment to sustainability and environmental responsibility. In addition to the scope and the actions implemented, the volume of waste generated directly correlates to the activity, and figures from previous years are difficult to compare. Some categories have nevertheless undergone significant changes related to major events.

In 2025, the Group evacuated 73,824 metric tons of waste, an increase of 7% compared to 2024. This increase reflects better traceability of waste within a broader scope. The growth of non-hazardous waste, which constitutes 71% of the Group's total waste, is the main driver of this increase (+12% compared to 2024).

Non-hazardous waste

Among this non-hazardous waste, cables, representing a significant proportion (54%) of the Group's waste, recorded a significant increase of 34% between 2025 and 2024, particularly in France (+18%) and Romania (+92%), countries in which copper decommissioning work is underway, as well as for Orange Marine following major submarine cable retirement operations.

Hazardous waste

Conversely, the decrease in waste from wooden poles and network batteries led to a decrease in hazardous waste of 3% compared to 2024, this category accounting for 29% of the Group's waste. However, this decrease is less significant than that observed in 2024, as other categories of hazardous waste, including professional and network Waste Electrical and Electronic Equipment (WEEE), in particular linked to the compliance of service providers through the ongoing digitization of their process, are on the rise. Wooden poles remain the main contributor to hazardous waste, representing 59% of this category, 92% of which are generated in France.

The tonnages remain closely linked to the regulatory framework and the organization of industrial players, with a lower maturity in the Africa & Middle East region and Orange Business internationally, which represent 3% and 0.1% of the Group's waste, respectively. To enhance the quality and comprehensiveness of its waste reporting, Orange has used its policy and operating procedures to improve the recovery of WEEE and batteries and make it more reliable.

Of the waste produced by the Group, 93% is recovered (including 97% for hazardous waste) and 70% recycled (+11 points compared to 2024). This is mainly because cables are considered 100% recycled in Romania. These rates, which are relatively high, reflect Orange's strategy to collaborate with competent and reliable partners, while maintaining constant work on the identification and traceability of the main evacuation channels, particularly in Europe.

Some types of waste require specific treatment. This is the case for wooden poles and some hazardous waste, which, because of their composition, cannot always be recycled. This directly impacts the overall recycling percentage, although this remains a priority for the Group. For the scope excluding wooden poles, the recycling rate for hazardous waste is 75%.

The performance of providers plays a key role in these results, including their ability to provide a sufficient level of detail to ensure the traceability of waste from collection to end-of-life. This challenge is all the more important in the context of the CSRD, which requires more precise reporting on the final treatment of products. The in-depth work carried out in 2024 with providers to refine the reporting of the treatment of the waste recovered has begun to bear fruit for most European countries but remains a challenge for Romania, Belgium and eco-organizations overall, where significant differences remain between the expected level of reporting and current market practices.

Overview of waste-generating divisions

- France is the main waste producer within the Group, generating nearly 70% of total volumes. Cables (82% of non-hazardous waste) and wooden poles (65% of hazardous waste) constitute the largest volumes. The 19% decrease in wooden pole waste can be explained by a slowdown in fiber roll-outs that directly reduces the number of poles to be replaced. Conversely, other hazardous waste is increasing, mainly in connection with network maintenance operations and the replacement of old batteries, ahead of the shutdown of 2G in 2026. In addition to these effects related to network activity, the digitization of processes and changes in the practices of collection and processing providers contributed to the rise in volumes identified. The use of the Trackdéchets platform for battery traceability as well as for hazardous waste from technical sites in 2025 led to a significant gap in the identification and transparency of data reported by providers. Finally, the reliability of the reporting of professional WEEE, enabled by the use of a new interface set up by eco-organizations, also contributed to the increase in volumes identified. At the same time, customer equipment collection campaigns led to an increase in WEEE, but with a high refurbishing performance;
- in the Europe region (outside of France) countries, which account for 25% of the Group's waste, the increase in cable waste (+69%) due to the decommissioning of copper in Romania and Poland drove the increase in waste in the region. Decommissioning also has an impact on the maintenance of the overhead network and the dismantling of wooden poles (+17%) with the emergence of a new metal pole waste stream. Conversely, the main site closures related to mergers of entities in Belgium and Romania, respectively, which were finalized in 2024, led to a 37% decrease in non-hazardous waste related to commercial sites;
- in the Africa & Middle East region, which accounts for 3% of the Group's waste and where waste treatment facilities are less mature, Orange acts through its internal WEEE Clean program to offer appropriate collection and treatment solutions (see Section 4.2.3.2.3.2 *Selecting service providers and promoting waste treatment channels*);
- the other divisions account for less than 5%: Orange Business, Orange Wholesale and TOTEM respectively account for 0.2%, 2.5% and 2.1% of the Group's waste.

MDR-M Waste

Orange complies with the definitions of the ESRS for all terms associated with waste and their treatment methods.

The tonnages reported correspond to the waste recovered that is no longer stored in Orange warehouses, and therefore has been evacuated. This allows reporting data to be linked directly to the evidence provided by waste management providers.

Orange considers waste to be processed when it is entrusted to a service provider or a licensed external organization, with or without a financial transaction, that is able to provide all the documents needed to ensure its traceability, from recovery to processing, and prove the waste has been processed.

In some countries, the responsibility for waste treatment is managed by public authorities, which select a list of providers and guarantee their recycling practices. This is the case for Orange's waste in Egypt and Jordan.

It remains difficult to obtain, in a timely manner, the information expected from service providers concerning the traceability and final treatment of Orange's waste (lack of clarity on the types of waste treated, the associated treatment codes, certificates of treatment, etc.).

Scope

At end-2025, Orange had advanced mapping of the waste identified by subsidiary. The coverage rate for "waste" reporting is expressed as a percentage of the Group's 2025 revenue.

For the 2025 reporting, based on the 2000/532/EC list, several changes in scope were implemented:

- Orange Business: the scope covered therefore represents nearly 40% of the division's revenue. New entities have been integrated into the reporting scope, including Basefarm (Norway and Sweden), Enovacom, Expertime and Orange Cyberdefense, which explains the increase in volumes observed. This first consolidated reporting exercise is a major step forward, although the consolidation work continues in order to ensure comprehensive coverage of waste streams. However, no *pro forma* information for 2024 was prepared. As certain processing rates could not be obtained, the practices of other entities as well as historical data were used for estimation purposes. The data for Orange Business in France were collected. However, in order to clarify the exact scope, a study is still underway on WEEE and batteries;
- TOTEM: for TOTEM France, 2024 was the first year the reporting was structured with the developers. At that time, some of the data had been integrated, although they did not relate directly to TOTEM's activities, but to those of third parties involved in the same projects. An in-depth analysis conducted in 2025 made it possible to clarify hazardous waste reporting for TOTEM France. Work on reliability is still underway, especially for the waste generated as part of the indoor activity. It should also be noted that TOTEM France's activity is cyclical, as it is highly dependent on critically important but one-time projects. In 2025, a major project to dismantle mobile sites explains the spike in non-hazardous waste. Conversely, the absence of an asbestos removal program over the fiscal year accounts for the decrease in hazardous waste. TOTEM Spain has also undertaken significant work to consolidate its reporting, which is still heavily reliant on subcontractors whose level of maturity on reporting issues remains limited in the construction sector. The year 2024 was the first year of reporting for TOTEM Spain. While significant progress has been made in the reporting of tonnages by developers, transparency on the treatments applied remains a priority issue for 2026;
- Wholesale (Orange Marine): new data have been obtained from service providers working on the ships, helping to strengthen the reliability of the reporting. In addition, the reporting scope has been expanded due to the roll-out of a new reporting system, which also reports waste from ships that do not stop at the marine bases;
- Orange Belgium: the work done to consolidate network data has now made it possible to cover the entire scope. The tonnages reported are thus based on data from the service providers and replace the estimates previously used, which had tended to overestimate the volumes actually generated;

- Africa & Middle East (MEA) region: as in previous years, the priority is on the countries generating the highest share of revenue. The scope covered therefore represents nearly 70% of the MEA division's revenue. The majority of waste reporting relates to outgoing equipment from fixed assets (wooden poles, cables, WEEE, mobile-access network equipment, etc.). The volumes sent to service providers may include waste from previous years. In the Africa & Middle East region, the regulatory framework and the low level of maturity of the local treatment channels continue to impact the quality of the monitoring of waste and its treatment after removal. In Côte d'Ivoire, all "waste" contributors now report data; however, the timeline for the reporting still needs to be improved, particularly in the fourth quarter, which remains incomplete due to the lack of data related to administrative activity. In Cameroon, in-depth work has been carried out across the entire technical waste management chain (identification, classification and methods of transfer to providers), ensuring more comprehensive reporting.

Estimates

For the tonnages, data for the fourth quarter were estimated when the information could not be provided by the service providers in a timely manner: this is the case for France, Belgium, Slovakia, Luxembourg and TOTEM France.

For the waste treatment rates, in the absence of measurements, Orange used estimates, giving preference to detailed information from providers or otherwise information from more globalized providers (the most recent possible treatment ratios or codes). If the latter is not available, Orange uses reliable sources and the most recent possible sources for the market (Ministry of the Environment, Eurostat, main treatment providers in the country, etc.).

For example:

- in France: consolidation of a cross-reference table between waste types and treatment codes generally applied with the main service provider managing "other non-hazardous waste" (paper, cardboard, plastic, metal, glass, wood, concrete, etc.);
- in the Africa & Middle East region: Orange relied on information supplied by two of its local providers, that have processing facilities in France and contacts in Europe, and that apply techniques similar to those of European partners. These rates were used for Orange Cameroon (removal process not finalized on time);
- in the Europe region: update of the document aimed at providing key information on the treatment applied to different types of waste in the countries concerned. The data come from Eurostat, the European Statistical Institute, which compiles market data from various sources. The data are from 2022 and are updated every two years for most waste; however, new 2023 rates have been obtained for WEEE and batteries. Most European countries have managed to obtain data from their providers. This document has been used for Romania and TOTEM Spain, as well as for the Orange Business entities in Norway and Sweden that have different practices (additional costs).

4.2.3.3.5 E5 – Entity specific – Circular economy

Circular economy	Units	2025					2024 com- parable basis	% N/N-1 Group
		France (OFR)	Rest of Europe	MEA	OB	Group	Group	
Mobile phone collection	%	38.7%	15.1%	14.8%		25.3%	29.0%	-12.6%
Sales of refurbished mobile phones	%	7.2%	1.7%			4.6%	4.4%	4.6%
Fixed customer equipment collection (CPE)	%	72.7%	88.6%	50.6%	70.5%	74.2%	65.5%	13.3%

The coverage rate for the reporting on the circular economy is:

- 87% of 2025 retail revenues from mobile equipment sales for Orange's consolidated entities for the mobile phone collection rate;
- 100% of 2025 retail revenues from mobile equipment sales for Orange's consolidated entities (France and other European countries scope) for the rate of sales of refurbished mobile phones;
- 69% of 2025 retail revenues from in-plan and out-of-plan access for Orange's consolidated entities for the fixed equipment (CPE) collection rate.

Mobile phone collection

The mobile phone collection rate reached 25% at the Group level in 2025 and decreased 4 points compared to 2024.

However, the dynamics in the Europe region and the Africa & Middle East region are different.

In Europe (France and rest of Europe), this rate reached 27% in 2025 and rose by 4 points, with an increase of 6 points in France, thanks

to the Buyback program, and of 3 points in Europe. In total, more than 1.350 million mobile phones were collected in the region in 2025, i.e. 12% more than in 2024. There has been a steady decline in mobile phone sales, down 7% in 2025 compared to 2024. Since 2008, more than 24 million mobile phones have been collected.

In the Africa & Middle East region, the mobile phone collection rate is 15%, but has decreased 14 points due to the closure of two of the five workshops.

At the European level, mobile phone collection through buybacks represents about 73% of all mobile phones collected.

Sales of refurbished mobile phones

The rate of sales of refurbished mobile phones reached 4.6% at the Group level (Europe scope only) in 2025, a very slight increase of 0.2 points compared to 2024. This improvement is due to a decline in new handset sales and the increased resilience of refurbished handset sales.

Collection of fixed equipment

The fixed equipment collection rate reached 74.2% at the Group level in 2025 and rose sharply, by nearly 9 points, compared to 2024. However, the expansion of the scope in 2025, with better traceability of flows and the factoring in of four business processes (see note on methodology), makes it difficult to compare with 2024. In 2024, only the flows associated with the process for contract termination by the customer or by Orange for non-payment were taken into account.

Nearly 6 million pieces of fixed equipment were collected in 2025 and 19 million in five years.

MDR-M – Entity specific – Circular economy

Circular Economy (CE) KPI Committee

Metrics relating to the circular economy are reported quarterly with entity data that are consolidated in the SENSIO tool. The results are analyzed and approved by the Circular Economy KPI Committee. The Committee publishes a quarterly report and a metric monitoring dashboard that is transmitted to the Executive Committee. This Committee is made up of representatives from the Group entities responsible for implementing and monitoring the circular economy projects for which these metrics have been defined.

Mobile phone collection

Europe including France scope

The collection rate is defined as the ratio of the total number of used mobile phones collected during the year to the total number of new mobile phones sold during the same year on the BtoC and BtoB markets (smartphones and feature phones).

Mobile phones collected concern both mobile phones with value (mobile phones that can be reused after secure deletion of personal data and a refurbishing process) and obsolete mobile phones (mobile phones with no commercial value, considered to be waste, and which are therefore intended to be sent to licensed recycling channels).

Used mobile phones are collected through various initiatives:

- buybacks of used mobile phones from customers;
- eco-citizen collection, with no commercial transaction, in stores and as part of one-off actions (at events, in schools, etc.);
- collection of mobile phones at the end of a lease;
- collection of mobile phones through after-sales service (faults, returns from online sales, etc.).

Data relating to mobile phone sales and collection are collected quarterly by each entity in the SENSIO tool, then analyzed and approved by the Circular Economy KPI Committee.

Africa & Middle East scope

In the Africa & Middle East region, mobile phone collection is carried out either by the entities through the various initiatives described above, or by the collection and sorting workshops set up with Emmaüs International in Burkina Faso, Cameroon and Côte d'Ivoire.

The collection rate of these three workshops is defined as the ratio of the total number of mobile phone equivalents in recovered waste during the year to the total number of sales of new mobile phones

during the same year. For the purpose of calculating this collection rate, 150 g of waste is equivalent to one mobile phone.

Mobile phone waste is collected from small repairers and is representative of the composition of a mobile phone in terms of valuable materials (electronic cards) and non-valuable materials (non-recoverable: plastic, batteries, etc.).

The data are provided by the Emmaüs International manager to the Orange representative of the Africa & Middle East region.

To calculate the collection rate, the sales of new mobile phone data come from data centralized by Orange Innovation (smartphones and feature phones). These data are estimated when entities are unable to provide them.

The mobile phone waste collection rate for these three workshops converted into mobile phone equivalents is in addition to that of the collection carried out by the entities as indicated above.

It should be noted that entity-specific initiatives (Buyback of mobile phones, eco-citizen collection) are still marginal and *ad hoc*, but are important levers to strengthen the responsible operator approach in the Africa & Middle East region.

All data are entered quarterly in a file in the SENSIO internal tool by the representative of the Africa & Middle East region, then analyzed and approved by the Circular Economy KPI Committee.

Sales of refurbished mobile phones

The rate of sales of refurbished mobile phones is defined as the ratio of the total number of mobile phones refurbished during the year to the total number of new and refurbished mobile phones sold during the same year on the BtoC and BtoB markets (smartphones and feature phones).

This indicator applies only to the Europe region including France.

Data are collected quarterly by each entity in the SENSIO internal tool, then analyzed and approved by the Circular Economy KPI Committee.

Collection of Customer Premises Equipment

Customer Premises Equipment (CPE) refers to equipment installed at customer premises under leases. This includes routers (*Liveboxes*), set-top boxes, Optical Line Terminations (OLTs), Wi-Fi repeaters and Mobile Broadband (MBB) equipment. This equipment is collected with the aim of reuse or recycling once it becomes obsolete.

The CPE collection rate is defined as the ratio of the volume of CPE collected to the total volume of CPE to be collected.

This indicator applies to the Europe region including France, certain Africa & Middle East region countries (Jordan, Senegal) and Orange Business.

The volumes to be collected come from the following four business processes:

- termination of the contract by the customer or by Orange for non-payment;
- after-sales exchange;
- migration (changes to customer contracts, mass replacement of obsolete equipment);
- customer's withdrawal after an online purchase.

The collection rate is calculated with a one-quarter lag between the reporting period (quarter n) and the actual collection period (quarter n-1). This lag makes it possible to take into account the time required for the data to be reported by logistics and by the refurbishing partners.

Every quarter, the data are collected by the Group *supply chain* in the SENSIO tool and in the Reverse Home Dashboard. The data are analyzed and approved by the Circular Economy KPI Committee.

4.2.4 EU taxonomy

Since the fiscal year ended December 31, 2021, Orange has disclosed certain performance indicators pertaining to the entire financial consolidation scope. These indicators show the proportion of its eligible then aligned revenues, capital expenditure (CAPEX) and operating expenditure (OPEX) related to products and/or services associated with economic activities qualifying as sustainable within the meaning of Article 8 of European Regulation (EU) 2020/852 of June 18, 2020 on the establishment of a framework to facilitate sustainable investment within the European Union, as well as European Commission Delegated Regulations 2021/2139, 2021/2178, 2023/2485 and 2023/2486 (hereinafter the "EU taxonomy").

Since the fiscal year ended December 31, 2025, Orange has chosen to apply Delegated Regulation 2026/73 of July 4, 2025. Orange has therefore conducted an analysis of its activities, starting with the Group's business model, which showed that the core businesses are not included in the scope covered by the EU taxonomy to date and that the rest of the activities that may be eligible are not material. The analysis was carried out and materiality was assessed individually for each of the taxonomy key performance indicators.

The Group's various economic activities that cumulatively represent less than 10% of revenue, CAPEX or OPEX were not subject to a detailed eligibility and alignment analysis, in accordance with the materiality threshold provided for in Delegated Regulation 2026/73.

Revenue

The analysis of segment revenue (Note 1.2 *Segment revenue in the Consolidated Financial Statements*) shows that the provision of connectivity services (convergent services, mobile-only services and fixed-only services) to BtoC and BtoB customers and other telecommunication operators is the Group's core business. These connectivity services are not included in the EU taxonomy in accordance with the provisions of the Delegated Regulations in force.

Within revenue excluding the Group's connectivity services, the total revenue that can be linked to eligible activities is considered not material (less than 10%) and mainly concerns data processing, hosting and related activities (CCM 8.1), data-driven solutions for GHG emissions reductions (CCM 8.2) and programming and broadcasting activities (CCM 8.3) within Orange Business, and sales of second-hand goods (refurbished mobile phones) in France (CE 5.4), as well as product-as-a-service and other circular use- and result-oriented service models (leasing of routers and set-top boxes) for the France and Orange Business segments (CE 5.5). Since these activities are not material, Orange no longer discloses the breakdown of the revenue relating to activities that may be eligible and aligned within the meaning of the EU taxonomy.

The proportion of the Orange group's revenues related to not assessed activities considered non-material, presented in the "Performance indicators" table below, is determined by dividing the sum of revenues from eligible activities by the consolidated revenues (established pursuant to IFRS 15) presented in Section 3.1.2.1 *Group revenue*.

Capital expenditure (CAPEX)

The analysis of segment investments (Note 1.5 *Segment investments in the Consolidated Financial Statements*) makes it possible to conclude that the majority of the Group's investments are focused on the roll-out of infrastructure that allows fixed and mobile telecommunication networks to operate, supporting the Group's revenue generation, and that, therefore, most of Orange's investments are not covered by the EU taxonomy to date.

Similarly, the analysis of segment investments shows that the nature of the Group's CAPEX not related to the roll-out of fixed and mobile telecommunication network infrastructure is comparable to the nature of the CAPEX in France and makes it possible to conclude that the total CAPEX that can be linked to eligible activities cumulatively represents less than 10% of the Group's CAPEX and is therefore considered not material. These activities mainly concern right-of-use assets, with the acquisition and ownership of buildings (CCM 7.7) and transport by motorbikes, passenger cars and light commercial vehicles (CCM 6.5), and investments related to the circular economy, with product-as-a-service and other circular use- and result-oriented service models (EC 5.5) and repair, refurbishment and remanufacturing (EC 5.1). Since these activities are not material, Orange no longer discloses a breakdown of CAPEX relating to activities that may be eligible and aligned within the meaning of the EU taxonomy.

Capital expenditure as defined by the EU taxonomy is to be distinguished from the operational indicator of economic CAPEX ("eCAPEX") as disclosed in the Group's financial statements, which relates to the acquisition of property, plant and equipment and intangible assets excluding telecommunication licenses and financed assets, minus the price of disposal of fixed assets (see Section 3.1.5 *Financial indicators not defined by IFRS* and Section 7.2.1 *Financial glossary*). A breakdown of the Group's CAPEX is provided in Note 1.5 *Segment investments in the Consolidated Financial Statements*.

Operating expenditure (OPEX)

The quantitative analysis of OPEX within the meaning of the EU taxonomy shows that it is not representative of the Group's business model, as it relates to consolidated revenue, which is mainly composed of activities that are currently ineligible. In addition, the majority of the Group's OPEX is used to maintain assets (fixed and mobile telecommunication networks) not included in the scope of eligibility of the EU taxonomy.

The OPEX indicator within the meaning of the EU taxonomy is not material in the Orange business model, which is consistent with the non-materiality of the revenue and CAPEX performance indicators. As a result, Orange no longer discloses a breakdown of OPEX relating to activities that may be eligible and aligned within the meaning of the EU taxonomy.

Analysis of the eligibility of the various economic sectors for each revenue, CAPEX and OPEX indicator could evolve in line with the maturity of the European Commission's work.

Key Performance Indicators

KPI	Total	Proportion of Taxonomy eligible activities	Taxonomy aligned activities	Proportion of Taxonomy aligned activities	Breakdown by environmental objectives of Taxonomy aligned activities						Proportion of Taxonomy enabling activities	Proportion of Taxonomy transitional activities	Not assessed activities considered non-material	Taxonomy aligned activities in previous financial year (N-1)	Proportion of Taxonomy aligned activities in previous financial year (N-1)
					Climate Change Mitigation	Climate Change Adaptation	Water	Circular economy	Pollution	Biodiversity					
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
	M EUR	%	M EUR	%	%	%	%	%	%	%	%	%	%	M EUR	%
Turnover	40,396	-	-	-	-	-	-	-	-	-	-	-	3.2%	755	1.9%
CAPEX	8,431	-	-	-	-	-	-	-	-	-	-	-	4.1%	99	1.3%
OpEx	2,371	-	-	-	-	-	-	-	-	-	-	-		35	1.5%

4.3 Social

4.3.1 Human rights

4.3.1.1 Human rights group policy

The human rights group policy provides the global framework for Orange's human rights commitments.

It is focused on five priorities and takes a topic-based rather than target-based approach due to the cross-functional nature of the issues addressed. The priorities are as follows:

- promoting digital citizenship: provide equal access to telecommunication services, make digital inclusion one of the pillars of Orange's social commitment and work toward ethical, inclusive and responsible innovation;
- campaigning for privacy and freedom of expression: protect customers' data and their digital identity, raise awareness of the risks associated with the use of digital data, and not restrict the right to privacy and freedom of expression;
- acting for non-discrimination and equal opportunities: encourage recognition of individual differences and develop initiatives that promote equal opportunities internally and externally;
- ensuring decent working conditions and do business with complete confidence: provide a safe and healthy working environment for all employees, in all countries where the Group is present, ensure respect for human rights in all its activities, including those of its suppliers, subcontractors, affected communities, consumers and end-users, and act with honesty, integrity, and fairness in the conduct of its business;
- mitigating the environmental impacts associated with Orange's activities in order to advocate for a holistic approach to human rights and the environment, and ensure that its activities do not affect the health of local communities.

Ensuring and promoting respect for human rights is the responsibility of the Group's CSR Department. Operational implementation is carried out cross-functionally by various entities (Group Human Resources Department, Group Procurement Department, General Secretariat, business divisions, etc.) through related operational policies and documents (diversity, equity and inclusion policy; health and safety policy; personal data protection policy; supplier code of conduct, etc.). It may be strengthened by local provisions.

The human rights group policy applies to all Orange entities and subsidiaries, regardless of where they are located, and to all relevant stakeholders: own workforce, employees in the value chain, affected communities, and consumers and end-users.

Prefaced and signed by the Group's Chief Executive Officer, the policy and its implementation, along with associated priority monitoring indicators, was presented to the Executive Committee in September 2024, on and then presented to the Governance and Corporate Social and Environmental Responsibility Committee (GCSERC) in November 2024. The commitments under this policy are supported at the highest level of the undertaking and the chief executive officers of the subsidiaries are responsible for applying the principles of the policy in their entities.

The Group's human rights policy complies with international standards:

- the Universal Declaration of Human Rights;
- the International Covenant on Economic, Social and Cultural Rights;
- the International Covenant on Civil and Political Rights;
- the UN Conventions on the Elimination of All Forms of Discrimination against Women, on the Rights of the Child, on the Rights of Persons with Disabilities, as well as on the Elimination of All Forms of Racial Discrimination.

All of the Group's policies with respect to its employees, workers in the value chain, customers and end-users are based on the recommendations and respect texts' principles developed for businesses, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the Guiding Principles of the United Nations Global Compact, and the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work.

The human rights policy respects the principles of the international and national organizations to which the Group adheres and those in force within the sector (GSMA, ITU, JAC, Global Network Initiative – GNI, etc.).

The human rights group policy also complies with laws on modern slavery (the Modern Slavery Act), the law on the duty of vigilance, and the international agreements on social rights signed with UNI global union. The policies with respect to its employees and workers in the value chain explicitly address the non-use of human trafficking, forced or compulsory labor and child labor.

The human rights policy was developed in consultation with internal stakeholders (entities responsible for the subjects mentioned in the policy) and discussed with external stakeholders with expertise in human rights and their impacts for organizations. Their contributions, in this context or in conversations with general or

specialized think tanks and forward-looking labs, were integral to the action plans that represent the operational implementation of the policy's five priorities. The human rights policy is available on Orange's website at www.orange.com. A number of presentation sessions were held at various Group entities in conjunction with the policy's March 2024 publication.

Orange actively participates in the multi-stakeholder working groups of international and national associations that promote respect for human rights in business (United Nations Global Compact, ILO, etc.) and within the sector (GSMA, ITU, JAC, Global Network Initiative – GNI, etc.). These ongoing dialogues supplement the identification and materiality of human rights issues, and also help promote the Group's positions.

4.3.1.2 Human rights of own workforce

In addition to the human rights group policy, Orange signed a global agreement on fundamental social rights with UNI global union in December 2006.

4.3.1.2.1 Content of the global agreement on fundamental social rights

This agreement defines Orange's commitments in terms of respect for fundamental human rights and applies to all employees of Orange entities. It includes the following elements:

- as part of the application of the ILO fundamental conventions, Orange undertakes to take particular care to prevent the use of forced labor, modern slavery and human trafficking; prohibit child labor and exploitation; combat discrimination; ensure occupational health and safety; and respect freedom of association and the principle of collective bargaining;
- with regard to the fight against all forms of compulsory and forced labor and the prohibition of child labor, Orange condemns and prohibits the use of all forms of forced or compulsory labor⁽³⁵⁾ and prohibits the employment of children under the age at which mandatory schooling ceases in the country concerned or, in any event, under 15 years of age, or 18 years of age for heavy or dangerous work⁽³⁶⁾;
- in terms of non-discrimination and as a matter of principle, the Orange group does not discriminate in any way in matters of employment relations. In particular, it hires men and women according to their skills and treats everyone with dignity, in a non-discriminatory manner and with respect for their age, social origin, family situation, gender, sexual orientation, disability, political, trade union and religious opinions, and their belonging or not belonging, whether real or assumed, to an ethnic group or nation⁽³⁷⁾. This non-discrimination theme was subsequently developed in the global agreement signed in 2019 on equality in the workplace within Orange and which reaffirms its commitment to the fight against discrimination and specifies its means of action in this regard (awareness-raising, training, reporting systems and processing);

- in terms of health, safety and working conditions, Orange constantly strives to ensure the health and working conditions of its employees, and ensures the medical care of its employees in compliance with local legislation. The commitment made under this agreement to implement a managed health care policy in all Orange entities was supplemented by the negotiation and signature of a separate global agreement in 2014 on the health and safety of Orange employees;
- in matters of social dialogue and relations with union organizations, Orange recognizes its employees' right to freedom of association, representation and membership in the trade union of their choice⁽³⁸⁾.

4.3.1.2.2 Implementation of the agreement

The effective respect of fundamental social rights is driven by the following actions implemented by Orange and/or UNI global union:

- trade union education provided jointly by management and the UNI global union in the event of the integration of a new country into the Group's scope based on Orange's signed agreements;
- direct dialogue during scheduled meetings on this subject or during questioning (conflict resolution clause provided for in the agreement) concerning, in particular, escalations of collective bargaining matters in Group companies;
- implementation of the *Hello Ethics* whistleblowing system, available to employees of Group entities, allowing them to report violations of human rights and freedom of association, or of personal health and safety (see Section 4.4.2.4 *Group whistleblowing system*).

This first agreement served as the basis for the negotiation of the two subsequent agreements on health and safety and equality in the workplace. Together, the three of them form a common foundation for Orange's entities, particularly in the event of the Group's expansion.

4.3.1.2.3 Remediation procedures

If an investigation confirms that a violation of the human rights of own workforce has occurred, remediation falls to the local HR departments. In France, for example, an email address specifically for harassment, sexism or violence in the workplace (HSVW) reports is available to all employees, and a document defining the "Framework for action for handling reports of harassment, sexism or violence in the workplace," intended for HSVW experts, provides the latter with a very comprehensive description of the procedure to be followed throughout the handling of the incident, with managers specifically designated for each stage. This framework for action is regularly revised based on legal, regulatory and case-law developments and on feedback from the local players in charge of the situations to be handled.

(35) ILO Conventions 29 and 105 on forced labor.

(36) ILO Conventions 138 and 182 on the minimum age for entry into work.

(37) ILO Convention 111 on discrimination.

(38) ILO Convention 87 (1948) on Freedom of Association and Protection of the Right to Organize.

4.3.1.3 Human rights of workers in the value chain

As part of its human rights policy discussed in Section 4.3.1.1 *Group human rights policy*, Orange describes its human rights commitments for all its stakeholders, including workers in its value chain.

In addition, the global agreement on fundamental social rights (see Section 4.3.1.2.1 *Content of the global agreement on fundamental social rights* above) also includes provisions for employees working in the value chain. In order to apply it, Orange implements:

- direct dialogue during scheduled meetings on this subject or during questioning (conflict resolution clause provided for in the agreement) concerning, in particular, escalations of subcontractors' respect of social rights (for example during the Covid pandemic, concerning the way in which subcontractors ensured the protection of their employees);
- in terms of purchasing, the supplier code of conduct and the CSR clause incorporated into the contract remind suppliers of their obligations in terms of freedom of association, non-use of child labor, non-discrimination, diversity, inclusion, and non-use of slavery and forced labor (see Section 4.3.3.2.4.1 *Ensuring that Orange's expectations in terms of respect for human rights in the value chain are taken into account*: supplier code of conduct and CSR clause). Prior assessments or audits ensure that suppliers comply with these principles;
- the *Hello Ethics* system allows workers in the value chain to report violations of human rights and freedom of association or of personal health and safety (see Section 4.4.2.4 *Group whistleblowing system*).

The mechanism for stakeholder dialogue involving workers in the value chain is based on direct dialogue through representatives of the UNI global union provided for in the agreement and the Mobile Worker Survey organized by Orange as part of the JAC audits. Any negative impacts identified in the JAC audits are monitored and remedied through corrective action plans (see Section 4.3.3.2.3 *S2-3 – Processes to remediate negative impacts and channels for value chain workers to raise concerns*). The CSR clause requires the Group's suppliers to notify Orange if they become aware of any breach of the supplier code of conduct or of the international human rights frameworks, to use all appropriate means to remedy this breach, and to inform Orange of the cessation of such breach.

4.3.1.4 Human rights of consumers and end-users

As part of its human rights policy discussed in Section 4.3.1.1 *Group human rights policy*, Orange describes its human rights commitments for all its customers and civil society as a whole.

In addition, the Group bases its approach on a recurring and structured dialogue with all its stakeholders, including rights holders. It also relies on coalitions (Global Network Initiative, United Nations Global Compact, JAC, ILO, GSMA, and the French association *Entreprises pour les Droits de l'Homme* – Businesses for Human Rights).

4.3.1.5 Severe human rights incidents at the Group

Orange adheres to and complies with the United Nations Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises at Group level, but does not have a process to monitor end-to-end compliance with these principles for all its stakeholders.

However, through its vigilance approach, Orange identifies the risks involved in respecting human rights for all its employees and the workers in its *supply chain* and in particular the risks related to health and safety and to working conditions, such as forced labor and child labor. This assessment is conducted in the countries where the Group operates and is based on the analyses of the consulting firm Verisk Maplecroft (see Section 4.3.2.1 *ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model*). Based on UN and OECD standards, these analyses are used to gauge the level of country risk linked to the human rights context and to heighten its vigilance.

In addition, incidents of human rights violations are reported in several ways: knowledge of incidents is mainly based on the *Hello Ethics* tool (see Section 4.4.2.4 *Group whistleblowing system*) and are also recorded through on-site JAC audits conducted by Orange regarding human rights violations in the *supply chain* and are subject to a review with corrective measures (see Section 4.3.3.2.3 *S2-3 – Processes to remediate negative impacts and channels for value chain workers to raise concerns*). For 2025, five severe incidents of human rights violations were reported through these channels in three areas: child labor (one incident), health and safety (three incidents) and excessive working hours (one incident). In addition, public incidents, when they are classified as severe, are handled by the governing bodies, and the details remain confidential.

4.3.2 ESRS S1 – Own workforce

Matters for Orange	Impacts, Risks, Opportunities	Policies	Main action plans
Skills and career development	Positive impact of developing and strengthening skills to improve employee employability and career development for new roles Risk of not having the skills to ensure business continuity and the Group's strategy roll-out Opportunity to attract and retain talent (through attractive career paths)	Skills development policy Talent management policy Diversity, equity and inclusion policy	– Manage employment and skills – Roll out the My Skills digital platform – Develop employees' skills – Promote the employer promise – Roll out talent management programs – Implement actions and programs for women
Employee engagement	Positive impact on employees of policies and practices that promote an inclusive and equitable work environment Risk of a decrease in productivity due to a lack of engagement and of a decrease in employer attractiveness	Compensation & benefits policy Diversity, equity and inclusion policy Talent management policy	– Develop culture and listening programs – Ensure pay equity – Promote equality and inclusion for all employees – Promote the Group's commitments externally
Occupational health, safety and security	Negative impact of harm to employees' physical and mental health (occupational accidents, conflict areas, climate-related hazards, etc.) Risk of reduced productivity because of occupational accidents or absences due to illness and reputational risk and risk of penalties in the event of a breach of personal safety	Occupational health and safety policy Group security policy	– Implement an occupational health and safety management system – Raise awareness among employees in all Group regions – Anticipate the impacts of climate change on employees – Learn from the results of the three-year working conditions and stress survey (Orange SA) – Support the Group's transformations
Personal data protection	Financial risk in the event of a breach of the security of employees' personal data	Personal data protection policy Orange charter: five commitments to protect employees' personal data	– Distribute the Orange charter – Provide training on personal data protection – Provide training on the responsible use of AI

Metrics	2025 progress	2025 targets	2030 targets	2040 targets
% of women in management networks	36%	35%		
Strive for equal pay for women and men in comparable roles by 2025	N/A ⁽¹⁾	Strive for equality		

(1) This metric is not disclosed in this report due to the time required for its consolidation.

4.3.2.1 ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

In its double materiality analysis, Orange identified three impacts, four risks and one opportunity related to its own workforce. The impacts identified are systemic and concern all Orange employees. The risk of reduced productivity because of occupational accidents or absences due to illness and reputational risk and risk of penalties in the event of a breach of personal safety arises from the negative impact of harm to employees' physical and mental health.

In order to identify these material impacts and risks linked to the human rights of its employees, the Group identifies, through its vigilance approach, the risks involved in respecting human rights by geographic area, for all its employees and in particular the risks related to working conditions, such as forced labor and child labor (see Section 4.3.1.5 *Severe human rights incidents at the Group*).

In 2025, the countries with significant risks of forced labor and child labor were: Central African Republic, Democratic Republic of the Congo, Guinea, Cameroon, Mali, Guinea-Bissau, Burkina Faso, Madagascar, Sierra Leone, Liberia, Côte d'Ivoire, Senegal, Jordan, Morocco, Egypt and Botswana, and countries with significant risks of forced labor only were Moldova and Romania.

4.3.2.2 Management of IROs related to training and skills development

In its double materiality analysis, Orange identified a “risk of not having the skills to ensure business continuity and the Group’s strategy roll-out” and an “opportunity to attract and retain talent by offering attractive career paths, particularly in technical fields and abroad.” Orange has also identified a “positive impact of developing and strengthening skills to improve employee employability and career development for new roles.”

4.3.2.2.1 S1-1 – Policies related to own workforce linked to training and skills development

4.3.2.2.1.1 Skills development policy

Orange’s skills development policy is designed to strengthen employee expertise and align development programs with the Group’s strategic objectives. It focuses on anticipating skills needs, as well as on the necessary training plans (upskilling), so employees can acquire skills that complement the ones they are already using in their jobs, and so they can acquire all the skills they need to perform a new job (reskilling). The aim of the policy is to ensure that the skills acquired meet the company’s needs, while also securing employees’ skills and employability to give them opportunities for career advancement. This policy, like all Group policies, is made available to everyone on the Group’s Intranet network. This proactive approach gives Orange the ability to continuously adapt to future challenges.

Skills development is the responsibility of the manager, and also of the employees themselves. The HR function offers support, mainly by providing access to the processes and tools that empower them.

The common digital “Orange Learning” platform gives most Group employees access to training resources; it can be supplemented with local tools. Targeted communications support and direct employees to training programs that meet the company’s needs.

Implementation of the skills development policy relies on governance at the Group level that brings together the directors of the Group schools and each division’s learning & development directors on a monthly basis. It is monitored through performance indicators, such as the number of hours of strategic skills training and employee satisfaction.

4.3.2.2.1.2 Talent management policy

The Group’s talent management policy has the dual goal of excellence and inclusion. It proposes common benchmarks and incorporates tools, standards and a consolidated Group calendar for all employees. It includes an assessment of performance and potential and the creation of an individual development plan. It facilitates preparations for filling key positions by developing talent pools and structured succession plans. The Group works to ensure that the same assessment and support principles apply to all Group employees, regardless of the division or country in which they work.

The Group Talent Management Department is responsible for rolling out its policy across the entire Group, which uses performance indicators to report to the Executive Committee on an annual basis. It relies on governance bodies at the division level, and on the Group’s talent management professionals. Meetings of the community of talent managers representing all the organizations and regions in charge of the local roll-out of the policy are held on a weekly basis.

In addition, it has talent management tools that compile all the useful key data, in compliance with the Group’s personal data protection policy.

Through its previous agreements, Orange is committed to complying with legal obligations on gender equality. In France, Orange acts in accordance with Law 2021-1774 of December 24, 2021, the “Rixain Law,” which aims to accelerate economic and professional equality and which creates an obligation of gender-balanced representation within senior management and members of the governing bodies of large companies.

4.3.2.2.1.3 Diversity, equity and inclusion policy

In the countries where Orange is present, the Group benefits from the diverse talent and skills of its employees, who represent more than 130 different nationalities.

The aim of the Group’s diversity, equity and inclusion policy is to help improve the company’s collective performance by promoting an inclusive environment of trust, in which employees can turn their individuality into a strength.

This policy was formalized in 2009 and promotes diversity to ensure the inclusion of all employees, regardless of gender, social or ethnocultural origin, age, health or disability, sexual orientation or family situation.

In October 2023, the policy, which is applicable to the Group as a whole, was amended and approved by the Executive Committee, and signed and supported by the Group’s Executive Vice President in charge of Human Resources.

The policy sets guidelines in three areas:

- gender equality in the workplace, which covers an increased proportion of women, particularly those in technical and digital roles; equal access by women to positions of responsibility; equal pay for comparable positions; the fight against discrimination and violence; and work-life balance;
- equal opportunities, which promotes a position of equity in terms of ethnocultural and social origins, age, disability and neurodiversity, sexual orientation and gender identity, or religious or trade union opinions;
- digital equality, which covers the development of responsible and inclusive artificial intelligence; diverse backgrounds in digital professions, particularly in the innovation fields; and employees’ access to digital tools.

This policy ensures that the internal processes, tools, environments and working conditions promote diversity, equity and inclusion, while maintaining a work-life balance. It also promotes these values internally and externally and encourages employees to become socially engaged (by serving as role models or mentors, etc.), reinforcing employees’ engagement and well-being. It is made available to employees on the Group’s Intranet.

Its implementation is organized at the Group level by the Diversity, Equity and Inclusion Department, which coordinates a network of local liaison officers responsible for applying the policy; they coordinate implementation at the entities in their scope, adapting it to each country’s local characteristics.

In developing its diversity, equity and inclusion policy, Orange took into account the needs of its internal stakeholders: employees and trade unions. Orange also surveyed its external stakeholders: candidates (measurement of expectations), regulators (the “Rixain Law” in France, etc.), NGOs and associations (assessment of social challenges).

Global agreement on gender equality in the workplace within Orange

In keeping with the main principles of the diversity, equity and inclusion policy, in 2019 the Group signed a global agreement on gender equality in the workplace, the fight against discrimination and violence (including harassment), and work-life balance with UNI global union, stating that “Orange develops its Corporate Social Responsibility as an international group in line with its adherence to the United Nations Global Compact, the principles set out in the Universal Declaration of Human Rights, and the standards of the International Labor Organization prevailing in the countries where the Group operates.”

The goal of the agreement is to operationally implement the key principles of the policy applicable to the entities and to establish a monitoring framework by relying on a structured local social dialogue that allows local assessments to be carried out and appropriate action plans to be defined.

The agreement specifies a number of resources to be deployed, such as a uniform measurement of pay gaps in all countries, training of managers and HR on discrimination issues, partnerships with local associations, awareness-raising actions and communications on these topics.

It is monitored through indicators, which are reported annually to UNI global union. In each country, local committees manage these metrics, thereby contributing to a proactive and participatory approach that adapts to the national context (see Section 4.3.2.8.3.1 *Gender diversity*).

4.3.2.2.2 S1-4 – Taking action on the material impact, risk and opportunity related to own workforce, and effectiveness of those actions linked to training and skills development

The policies for addressing the material risk of not having certain skills, on the one hand, and for seizing the opportunity to recruit, develop and retain talent, on the other, and also for developing the positive impact of developing skills to improve employees’ employability, are based on several action plans carried out within the Group in 2025.

Orange does not have a systematic process for identifying the resources associated with each action and discloses this information in part.

4.3.2.2.2.1 Managing employment and skills

To ensure business continuity and the Group’s strategy roll-out in all its regions, Orange relies on a comprehensive approach to managing professions, jobs and skills.

Thus, in the light of its *Lead the future* strategic plan, Orange is conducting a Strategic Workforce Planning (SWP) exercise to forecast, prioritize and define HR policies and action plans relating to jobs, professions and skills for the Group’s internal and external workforce.

The exercise aims to deflect the qualitative and quantitative impacts of major technological, business and market disruptions, such as the impact of virtualization and network automation, the continued digitalization of customer relations, business models trends in the BtoC and BtoB markets and the decommissioning of the copper network. The growing and increasingly cross-cutting impact of AI, including generative AI, and the transformation of the business model by tilting more toward CSR and security are also

analyzed in the various business lines and activities according to different timescales and granularities. Strategic workforce planning also provides a better understanding of the future skills that will be required of the Group’s employees and that will ensure their employability.

Orange can therefore identify the appropriate action plans, whether for recruitment, internal mobility, skills development, retention, career progression, or retraining.

The 2025–2030 SWP exercise is set in a constrained economic context. It demonstrates the need to continue the reduction in the workforce in France for legacy activities, to acquire the skills needed for activities in the strategic areas identified in *Lead the future*. At the same time, teams are being developed in other countries to support the development of growth regions and activities and move forward with the Group’s expansion in Africa & Middle East. For example:

- in the BtoC market, customer interactions increasingly take place via autonomous digital channels, facilitated by the acceleration in the use of AI; the end result is fewer jobs in telephone-based sales and customer service, coupled with a need to strengthen digital skills to improve customer excellence;
- in the BtoB market, the positioning of Orange Business as a leader in new connectivity and digital services, particularly in cybersecurity with Orange Cyberdefense, simplifying its operating model and adapting its cost structure, have resulted in fewer jobs and a radical change in the skills needed for specialist technical roles, such as cybersecurity experts;
- as part of the new company model (NCM), the support functions are committed to streamlining and sharing services to foster synergies, thereby reducing the number of jobs, particularly in France;
- in addition, in France, Orange is coordinating its copper network closure plan, which will take place over the course of several years until 2030;
- at the same time, Orange is strengthening skills in all its businesses to virtualize its networks and make CSR ambitions operational in all business lines and activities. As a result, trends such as the virtualization of telecom networks, the widespread adoption of the platform model and the growing share of APIs to connect IT and network infrastructure are shaping not only network architecture, roll-out, and operation but also the marketing models. The professions of architect and network engineer are key in this ecosystem.

The strategic workforce planning work is carried out in an agile way in conjunction with the divisions and business lines. It is used to map key skill areas and their breakdown by business line, geographic region and business entity throughout the Group. This mapping is broken down into three timeframes and scopes:

- for the next four years, at the Group level, it will be used to assess the impact of key business or technology guidelines on jobs, professions and skills;
- for the next two years, for the Orange in France scope and following the signature of the Employment and Career Path Planning agreement (GEPP) on February 10, 2025, the mapping will make it possible to share changes in the workforce in France and the related support in the context of the social dialogue, by clearly distinguishing between shortage, balanced and declining occupations. The HR liaison officers for Employment and Career Path Planning are responsible for sharing this information;

- for the next few months, at the business unit level, departures and recruitment needs will be identified through workforce budget oversight.

In particular, this analysis has enabled Orange's various trade schools to reprioritize their training courses.

As part of the new company model, SWP is one of the five prioritized HR processes included in the Business Process Management program, aimed at simplifying and optimizing the Group's cross-functional processes. A global process leader has been appointed for the Group. The process was documented and shared with all stakeholders, and a continuous improvement plan was initiated to make it more robust.

In this context, a tool development project has also been launched to secure and improve the granularity of quantitative projections, and to strengthen the Group's ability to launch action plans as early as possible to develop employees' employability. It aims to facilitate and secure the consolidation of results, refine cross-functional analyses by profession and region, and create different scenarios for changes in needs and resources. A minimum viable product (test product for a limited scope) was rolled out in the fourth quarter of 2025 with the objective of widespread adoption in early 2026.

The tool will be connected to the Group's HR information system and will utilize the Group's employment data, as well as data from the My Skills app for data on employee skills.

4.3.2.2.2.2 Roll out the My Skills digital platform

My Skills is an essential initiative to strengthen the sustainability of skills within the Group and also a strategic investment for the Group. By placing skills at the heart of the career path, this digital platform addresses the risk of a shortage of the skills that are critical to the implementation of the Group's strategy.

My Skills empowers each employee to take ownership of their career development by reporting their skills and receiving AI-driven, customized recommendations for positions, assignments and training opportunities. The integration with Orange's information systems offers a seamless and customized way for them to showcase their skills. It also provides an opportunity for everyone to be able to search for a colleague for peer support, seek out expertise or collaborate on a project.

After a successful pilot roll-out to 8,000 employees, since October 2025 Orange has been gradually expanding this solution to all the Group's regions, making it possible to expand the Group's talents and build a more agile and efficient organization that is also more participatory for employees.

4.3.2.2.2.3 Develop employees' skills

To provide employees with attractive career paths and address the risk of not having the skills it needs for its activities, in 2025 Orange continued to refocus on its fundamentals, prioritizing training in key skills (Cloud and virtualization, cyber and security, data and AI, management, CSR and culture), and stepping up the programs for reskilling based on the needs identified through strategic workforce planning.

In 2025, the focus was on two training programs, cybersecurity and business ethics. These were approved by the Executive Committee and are both a priority and mandatory for all Group employees. They were produced in seven languages and publicized through major communication campaigns by members of the Executive Committee, the Group Human Resources Department and divisions.

Upskilling on strategic skills has been stepped up, particularly on AI and data. Since 2021, more than 78,000 employees have been trained and Orange has launched a specific plan dedicated to

generative AI, structured around practical training for professions, specific support for top management and the creation of a "Gen AI transformers" community to support each profession in its transformation.

In France, in order to facilitate employee development and mobility (particularly for emerging and shortage professions), reskilling actions were strengthened with the creation of the Orange Perspectives program. In the context of the three-year agreement on Employment and Career Path Planning (GEPP), this pooled program aims to merge the programs that already exist at the entities, under simplified governance around a cross-functional steering committee.

Lastly, the programs proposed by the internal schools specifically target professions in cybersecurity, data and generative AI, and integration/automation, as well as the professions of architect (networks, software, Cloud platform), consultant (generative AI, IT and networks, data) and pre-sales engineer for digital technologies.

This action plan is a continuous improvement process and therefore does not have a defined time horizon.

4.3.2.2.2.4 Promote the employer promise

To support its *Lead the future* strategic plan and meet the challenges of its new company model, Orange, through its employer promise, wishes to attract the necessary skills at the right time and in the right place, while strengthening its reputation as an employer.

The Group is focused on recruiting and retaining employees in three key areas: innovation and technology, to ensure a global presence in artificial intelligence, data, the Cloud and cybersecurity; network & infrastructure, to develop key technical expertise; and customers & operations, to meet its quality-of-service goal and promote customer relations skills.

In a context of increased recruitment competition, the Group's vision is to engage qualified candidates and encourage them to choose Orange. This takes several forms:

- attracting the most qualified candidates based on their experience, expertise, profile and location;
- strengthening Orange's image as an employer of choice by highlighting its employer promise, culture and values;
- being candidate-centric and helpful at every step through personalization.

To meet this challenge, Orange has redesigned its recruitment portal, orange.jobs, with a centralized and uniform approach for all Group regions that is characterized by a customized and more efficient job search and AI-optimized interactions with the chatbot.

This recruitment portal will be shared across all countries and activities, with the same usability and editorial policy. English and French versions will be available in early 2026, and a Polish version is being developed with a launch expected in 2026.

4.3.2.2.2.5 Roll out talent management programs

Talent Review program

In line with the goal of the talent management policy, the Talent Review procedure (to identify and review talent at all levels of the organization) is intended for all employees. Its objective is to identify and develop talent, and to build individual development plans.

In 2025, Orange improved its annual Talent Review exercise to identify and mobilize the best skills in the right place at the right time, offer employees development and advancement prospects and prepare succession plans for key positions. These exercises are then submitted to the governance bodies on an annual basis (Executive Committee, management committees).

In 2025, the Talent Review exercise covered 78% of the Group's employees (compared to 55% in 2024).

Orange Graduate and Orange Graduate MEA programs

The Group's Orange Graduate Program (OGP) meets the need to attract the most talented individuals for the skills of the future and step up their performance by recruiting high-potential young graduates when they finish their studies. The profiles currently sought are mainly young people with technical skills and international experience who have completed different high-quality training courses or followed an atypical career path. This action plan is annual.

In 2025, the campaign recruited 43 people, of whom 56% were women and 65% had technical backgrounds.

To support the strategy of the Africa & Middle East region, Orange launched an Orange Graduate program for this region in the summer of 2025. It targets students graduating from elite universities who are mainly from the Africa & Middle East region and who will make an exclusive commitment to that region for the desired period of six to eight years. The recruitment process is based on that of the OGP program. Thirty-five positions, mainly in the technical field, have been proposed in different countries in the region.

Rising Talents: a new program

In 2025, Orange launched a new program called "Rising" to identify and nurture high-potential young talent with around ten years of experience. This talent is selected for their ability to learn, recognition from peers, outstanding performance, strategic vision and adaptability. The first Rising Camp kicked off in July 2025 with 20 talented young people. Over a nine-month period, this program aims to strengthen their embodiment of the Group's values and their leadership, communication and decision-making, as well as their ability to propose concrete solutions to address the Group's issues. Participants also work on their personal development and strategic vision. They are regularly challenged to increase their impact and influence within the organization. This program thus makes it possible to prepare future leaders capable of contributing effectively to Orange's strategy and performance.

4.3.2.2.6 Implement actions and programs for women

Orange has developed several programs to boost competitiveness by diversifying its profiles, thereby fostering innovation and creativity within the Group, and enabling employees to improve their employability, especially in emerging fields.

Hello Women program

As women have not been well represented in technical roles, in 2020 Orange launched the *Hello Women* program dedicated to women at the Group level to improve gender balance on its technical and digital teams. Orange firmly believes that gender balance is the key to the company's financial performance, to innovation and to employee well-being. *Hello Women* provides an oversight structure, increases awareness of the program through initiatives in the countries and divisions, and communicates best practices within HR. Over time, it addresses the strategic skills topic by incorporating the diverse background dimension, in particular that of women in technical and digital roles, with a focus on four priorities:

- raising awareness of technical and digital roles among young girls and female students;
- identifying and attracting women who could be recruited;
- retraining women for these roles;
- retaining women in these roles.

Since the program's launch, more than 140 initiatives have been identified worldwide to meet this objective.

In order to promote these business lines from the time girls are in school, the *Hello Women* employees and role models are involved

internally and externally in fostering gender balance in these technical and digital fields. Leading by example and with their actions, they enable women to come forward, encourage girls to consider these jobs of the future, and inspire women who would like to follow this path or retrain. These external actions are rolled out in partnership with associations such as *Capital Filles*, *Sistech* and *Bcom Tech* in France, and *AjTY v IT* in Slovakia.

Between 2020 and 2025, *Hello Women* made it possible, across all the Group's regions, to recruit approximately 6,200 women, all contracts combined (including internships and work-study); reskill more than 990 women to prepare them for technical and digital roles, either through training, awareness-raising or recruitment; and support more than 2,600 women with the aim of retaining them in these roles. In the same year, Orange launched the *Hello Women* role model community in France. To date, this program has brought more than 380 women together (see Section 4.3.5.1.4.2 *Informing, training, empowering*, for the Group's additional civil society actions).

Women Up

Three development programs were launched in 2025 under the "Women Up" banner and are included in a new catalog of Group Talent programs. Designed to serve as a common foundation, Women Up provides a comprehensive, cohesive and inclusive offer that is accessible to all the women in the company, regardless of their roles or levels of responsibility.

Women Up comprises three separate programs that can be complementary, with each one targeting a specific development issue:

- increasing the representation of women in technical roles: "Women Up in Tech" – this program helps women unlock their potential, build their professional networks and work on their career plans. The program takes place over a period of up to 12 months;
- helping women gain confidence and plan for the future: "Women Up in Dev" – the goal is to help women gain confidence and be bold. They receive support for six to nine months;
- increasing the representation of women in the governing bodies and supporting female talent: "Women Up in Lead" – the goal is to accelerate the advancement of high-potential women, so that they can rise to key positions within the Group more quickly. The program takes place over six months with an international cohort.

In addition to these programs, a list of 100 women with potential has been established and shared with the Executive Committee; some of them receive mentoring from Executive Committee members. This action is part of a strategic approach aimed at accelerating the representation of women in management positions within the Group.

4.3.2.2.3 S1-5 – Targets related to managing the material risk, opportunity and impact concerning training and skills development

To assess the proper implementation of the policies and the impact of its action plans, Orange has set a target of 35% women in management networks by 2025.

Orange looked to the company's overall proportion of women, which was 35% in 2020, the year in which this objective was set. Stakeholders were consulted on this target, which is being monitored as part of the global agreement on gender equality in the workplace. It is also a component of the annual variable compensation of some of its employees (see Section 4.1.2.3 *GOV-3 Integration of sustainability-related performance in incentive schemes*).

4.3.2.3 Management of IROs related to employee engagement

In its double materiality analysis, Orange identified a risk of a decrease in productivity due to a lack of employee engagement and of a decrease in employer attractiveness due to working conditions, as well as a positive impact on employees of policies and practices that promote an inclusive and equitable work environment.

4.3.2.3.1 S1-1 – Policies related to own workforce linked to employee engagement

4.3.2.3.1.1 Compensation & benefits policy

The Group's compensation & benefits (C&B) policy aims to establish a set of principles and rules about how Orange pays its employees. The policy is aimed at employees, chief executive officers, their HR departments and compensation & benefits directors. It structures employee compensation to meet the challenges of attractiveness, retention and motivation while ensuring that the aspects of internal equity, transparency, regulatory compliance and budget control are taken into account.

The Group's Executive Vice President in charge of Human Resources, a member of the Executive Committee, is a signatory to the policy and is responsible for its implementation by General Management.

Orange's compensation and benefits principles are based on values of equity and non-discrimination and are designed to be implemented in all divisions, subsidiaries and entities of the Group through local compensation and benefits policies, taking into account specific market practices and regulatory requirements. Its application may be subject to approval by local governance (compensation committee, Board of Directors, shareholders' meeting), as needed. In cases where governance bodies (independent directors, minority shareholders) and/or national legislation so require, the policy may be adjusted accordingly.

The procedures for rolling out the policy in the Group's countries and entities are the subject of an annual follow-up, a summary of which is presented to the Executive Committee.

The compensation and benefits policy establishes the following five principles that define how Orange rewards its workers: place value on collective performance, recognize individual contribution, attract and retain key skills, strengthen the sense of belonging and respect equity.

At the local level (country or entity), these principles are set out in specific compensation terms and conditions for each employee (fixed compensation, variable compensation, short or long term where applicable, benefits, benefits in kind).

The five principles involve monetary and/or non-monetary programs. They cover all Orange employees, regardless of their status, gender, length of service or title. They provide guidance to ensure competitive, attractive and fair compensation and benefits policies in all Group entities and regions.

The principles are implemented on the basis of a structured framework and tools to ensure their harmonized roll-out in all Orange entities. These include salary scales for each position to allow fair differentiation, annual salary and variable compensation increases, harmonization committees composed of HR managers and operational managers, and compensation benchmarks.

Compensation and benefits principles and rules were co-developed with the network of compensation and benefits operating divisions and their director of human resources. However, each local compensation and benefits policy is specific to the challenges of Orange's activity in the territory concerned and is designed accordingly by local top management and their Human Resources Department.

The Group compensation and benefits policy is also based on a commitment to clarity and transparency toward employees. To that end, Orange ensures that each employee has access to clear, comprehensive information through various communication channels and documentary resources.

4.3.2.3.1.2 Diversity, equity and inclusion policy and talent management policy

The diversity, equity and inclusion policy and the talent management policy – which are a response to the material risk of a decrease in productivity due to a lack of employee engagement and of a decrease in employer attractiveness due to working conditions, as well as to the positive impact on employees of policies and practices that promote an inclusive and equitable work environment – are described in Section 4.3.2.2.1.3 *Diversity, equity and inclusion policy* and Section 4.3.2.2.1.3 *Talent management policy*.

4.3.2.3.2 S1-4 – Taking action on the material impact and risk related to own workforce, and effectiveness of those actions linked to employee engagement

In application of the compensation & benefits, diversity, equity and inclusion and talent management policies, and with the aim of protecting itself from the material risk of reduced employer attractiveness and disengagement on the part of its employees and of continuing to develop the positive impact on employees of practices that promote an inclusive work environment, Orange rolled out several action plans in 2025.

Orange does not have a systematic process for identifying the resources associated with each action and discloses this information in part.

4.3.2.3.2.1 Develop culture and listening programs

Cultural transformation program bringing together all Group employees

In order to strengthen employee engagement, Orange worked in 2024 on the elements of its culture, the "how," i.e. how to do things and how to interact with colleagues or with customers, suppliers or partners.

Orange's culture is based on three values that guide collective practices and individual behaviors:

- caring: taking action to deliver the best to customers, co-workers and stakeholders;
- responsible: delivering on commitments, acting responsibly and speaking truthfully;
- bold: showing ambition and determination and taking initiatives to seize opportunities for the undertaking.

These values capitalize on Orange's current strengths and provide a foundation for upholding the Group's purpose and rolling out its strategy. They are inseparable, and it is their combination that makes them so strong.

To roll out the cultural transformation project, Orange makes use of five levers, each comprising specific actions, which allow employees to understand and embody this culture and these values on a daily basis:

- understanding meaning: this communication plan supported by the members of the Executive Committee reached all employees through articles on the Intranet, podcasts and the massive roll-out of culture workshops, to explain the purpose, strategy, brand, company model and culture to employees. At December 31, 2025, 72,299 employees, i.e. 59% of the Group's workforce, had attended a workshop;
- seeing people change around you: the update to the leadership and management training offer, to instill the desired behaviors but also support managers in their leadership development;
- seeing the system change: the launch of symbolic actions that are more in step with local realities, such as the My Customer My Boss initiative in the Africa & Middle East region;
- knowing how to act in your entity: implementation of roadmaps at the entity or country level, tailored to their business challenges;
- being part of an overall dynamic: changes in governance, with the establishment of culture project managers (one per Group entity) who are responsible for roll-out and appropriation within their respective divisions. They are also responsible for reporting on best practices and creating a competitive spirit within the Group. The results of the 2025 Voice Up employee listening survey provided the first impact measurement with 86% of respondents stating that they were familiar with the three values and 81% adhering to them.

Voice Up employee listening

Employee listening is central to the work of HR and management. This is a quality of life and working conditions approach, giving Orange an insight into how the progress already made within the Group and its various business lines is perceived, and enabling it to identify areas for improvement to meet employee expectations.

This annual listening system also makes it possible to assess employees' engagement and trust in all the Group's regions.

During the Voice Up campaign that ran in January 2025, 72% of the Group's 122,000 employees gave their opinions, an increase of seven points compared to the previous campaign.

The 2025 results also highlight the commitment of the Group's employees:

- 79% are proud to work at Orange, with an engagement level of 71%;
- 76% say they are able to maintain a reasonable work-life balance;
- 79% believe that diversity, equity and inclusion are respected in the workplace.

The results of this campaign made it possible to identify the topics that need attention, such as explaining the Group's strategy to employees, engaging them in it and improving certain processes that support the business.

The results of the 2025 campaign were widely communicated, first to the members of the Executive Committee, then during a seminar with the Group's top management and lastly to each division. The Group's major trends were shared with all employees on the Intranet.

In 2025, this listening system became a real managerial monitoring tool, notably thanks to synergies with the HR teams: managers (having had more than ten respondents within their team to ensure their anonymity) now have access to their detailed results. After helping them become familiar with the tool and with the use of the results, they can now share their results with their team for on-the-ground feedback.

Giving everyone ownership of the results makes it possible to implement action plans wherever necessary. In addition, these actions further reinforce the work initiated through the culture project to enhance the understanding of the levers of engagement.

The 2026 campaign took place from January 6 to 27, 2026 and the results of this campaign will be shared in the first half of 2026.

Plan for the coordination of social dialogue

Employer attractiveness and employee engagement are also nurtured by constant social dialogue.

To support its international development and respond to changes in working and social conditions, Orange has developed tools for international social dialogue, in addition to the social dialogue that takes place in the Group's companies, according to the rules and practices applicable locally.

These consist of forums for international social dialogue, i.e. the European Works Council, the Worldwide Works Council and the Orange-UNI global union federation. They have made it possible to establish a common basis of rights (see Section 4.3.2.6 *S1-2 – Processes for engaging with own workforce and workers' representatives*). The Executive Vice President in charge of Europe Human Resources, who also serves as Director of International Social Relations, is responsible for coordinating these committees.

4.3.2.3.2.2 Ensuring pay equity

Adequate wage

Orange implemented an adequate wage action plan with the aim of obtaining the certification of the Fair Wage Network, a non-governmental organization recognized by the UN, for the year 2024. After obtaining this certification, Orange continued its work in 2025 to ensure that an adequate wage is guaranteed in all Group entities.

To this end, precise rules on the adequate wage, also known as the living wage, have been incorporated into the Group's compensation & benefits policy since 2024. The adequate wage is determined using The Fair Wage Network methodology. Each entity is required to meet the minimum adequate wage level for its region. If employees are being paid below the adequate wage, the entity must undertake to adjust their wages during the annual wage review. When recruiting, the entity must ensure that this minimum is taken into account. It is the responsibility of the entities to implement, on a permanent basis, all the actions necessary to meet the adequate wage level, as defined Group-wide. If other standards more favorable than the adequate wage are required by law, those standards apply.

The purpose of the Global Living Wage Employer certification is to ensure that all of these rules are respected.

In 2025, the Fair Wage Network awarded Orange the Global Living Wage Employer certification for the second year in a row.

Promotion of employee shareholding

The sense of belonging to the Group is also fueled by employee shareholding programs. In France, this is reflected in annual collective compensation plans (incentive agreements covering around 20 Group companies in France and a Group profit-sharing agreement), and the possibility of investing in Orange shares in the employee shareholding fund, supported by the company through an employer contribution to employee savings schemes. In addition, for certain categories of employees who perform key functions within the Group, a long-term incentive plan (LTIP) is done through share awards (see Section 5.4.1.3 *Compensation structure for executive and non-executive Corporate Officers for 2026* and 3.3 *Consolidated Financial Statements – Note 6.3 Share-based compensation*). These three programs contribute to strengthening the share of employees in the Group's capital (see Section 6.2.1 *Distribution of capital and voting rights*).

In particular, a profit-sharing agreement was signed with trade unions in June 2013. This agreement applies to employees of Orange SA and its majority-owned French subsidiaries that are parties to the agreement. Using a dispensatory calculation formula, each company's special profit-sharing reserve is equal to 4% of its operating income (French standard), and the Group's profit sharing amounts the sum of the positive special profit-sharing reserves of the companies that are parties to the agreement. The Group's special profit-sharing reserve is distributed among all beneficiaries, 20% based on their length of service and 80% in proportion to their gross annual compensation. The sums allocated individually are, at the employees' choice, received directly or allocated to the Group's savings plans.

In addition, still in France, incentive agreements are signed in each Social and Economic Unit concerned. They collectively associate employees with the company's results. Most of these agreements are based on a financial indicator and operational priorities. The profit-sharing envelope, if objectives are achieved, is between 2% and 4% of salaries. Under the Orange SA agreement covering the years 2024 to 2026, the incentive bonus is primarily based on the achievement of an operational performance indicator (growth of revenue, control of operating expenses and optimization of investments in all markets) for a weight of 50%. This indicator is complemented by an indicator relating to the quality of service offered to customers with a weight of 35% (a measure of customer satisfaction across all universes and markets) and a social responsibility indicator relating to the reduction of GHG emissions generated by the activity, for a weight of 15%.

Equal pay

Orange places gender equality in the workplace at the center of its business project. This approach is based on the conviction that diversity, in all functions and at all levels of the undertaking, is a guarantee of attractiveness and success due to its drive, creativity and financial performance.

Orange is therefore committed to ensuring equal pay for women and men by means of a dedicated action plan, including annual reviews under the guidance of the teams in charge of the compensation & benefits policy; these give rise to a critical review of the gap situation by entity and recommendations for corrective action. These reviews are continuous improvement processes and do not have a defined time horizon.

This action plan is implemented through a process common to all Group subsidiaries that gives rise to an annual inventory, with equal pay being one of the criteria audited and certified as part of Gender Equality & Diversity for European & International Standard (GEEIS) certification.

All Group entities have a common statistical tool that allows wage gaps to be measured consistently in each country. This method is rolled out in subsidiaries with more than 400 employees to identify, each year, gender pay gaps as unadjusted differences in compensation (i.e. the gross average gender pay gap expressed as a percentage of men's average pay) and as adjusted differences in compensation (i.e. the residual differences, corrected for non-discriminatory factors in comparable positions for the observable common categories (level of responsibility, field of work)). This second calculation step makes it possible to determine the proportion of the wage gap that can be justified by non-discriminatory factors.

4.3.2.3.2.3 Promoting equality and inclusion for all employees

Gender Equality European & International Standard (GEEIS) label

The promotion of diversity and the fight against discrimination increase employee engagement and maintain a work environment that favors their well-being.

In order to certify its approach to equality in the workplace and diversity, Orange seeks to comply with the Gender Equality European & International Standard (GEEIS). This is an international standard that aims to participate in the creation of a common international culture about gender equality and diversity in the workplace. It allows Orange to benefit from international recognition, to promote the implementation of tools for managing a global egalitarian and diversity strategy, and to promote exchange between the Group's various countries guided by a common reference framework.

The label is issued by Bureau Veritas and Tüv Rheinland, which base their assessments on 10 criteria and 6 levels of maturity per criterion and how robust and voluntary Orange's professional equality and/or diversity policies are. The certification is renewed for a period of four years, with an intermediate follow-up stage every two years. The implementation of this common standard makes it possible to assess actions relating in particular to compensation, promotion, skills development and gender diversity in the professions, as well as the quality of the Group's social dialogue and its overall impact on its internal and external stakeholders, in line with the UN's 17 Sustainable Development Goals (SDGs).

This proactive approach is led and coordinated by the Group Diversity, Equity and Inclusion (DEI) department, which provides committed subsidiaries with methodological tools and support throughout the preparation phase. Each audit results in a presentation in the presence of the auditor, the team in charge in the subsidiary and the Group DEI department, in order to identify good practices and areas for improvement.

Between 2011 and 2025, 26 entities were certified in 20 countries. In 2025, seven renewal audits and two follow-up audits were conducted, and one new entity received GEEIS certification (Orange Business North America) for a total of ten audits.

In the context of the accelerated use of AI, in 2020 Orange also launched, with the Arborus endowment fund, the International Charter for Inclusive AI (156 signatories), which creates a framework of trust for everyone on how AI systems are designed and used. As a continuation of this approach, in 2020 the Group was the first company to obtain GEEIS-AI certification, which assesses its ability to raise awareness throughout the AI development chain, from its design to its operation. For this audit, Orange mobilized numerous professions and expertise in the service of its entire ecosystem. This applies in particular to human resources management processes in order to ensure that they are non-discriminatory, while promoting diversity in AI professions, a major challenge for the future. This certification was renewed in 2025.

Roll-out of the global agreement on equality in the workplace

Orange is following through on its commitments with the roll-out of the global agreement on gender equality in the workplace, the fight against discrimination and violence and work-life balance signed on July 17, 2019 with the UNI global union (see Section 4.3.2.2.1.3 *Diversity, equity and inclusion policy*). This agreement is in force with no limited time horizon.

This agreement has made it possible to set up workplace diversity/equality committees in the subsidiaries (with over 400 employees as a priority) and its roll-out is based on the establishment and coordination of a network of diversity/equality managers and liaison officers at three levels: Group, division, country.

The Group's Diversity, Equity and Inclusion department presented a summary of this information at the annual meeting between Orange and UNI global union, as well as the monitoring of the 15 quantitative and qualitative metrics listed in the agreement.

To date, the agreement has been rolled out in 33 entities based in 29 countries, representing more than 85% of Group employees, and Orange continues to disseminate it more widely each year, for example with the subsidiary Orange Business Madagascar, which rolled out the agreement in 2025.

In France, as part of the renegotiation, in August 2024, of Orange Business SA's three-year agreement on gender equality in the workplace and the fight against discrimination, new commitments have been made on the "work-life balance" aspect: mainly an extension of paternity and childcare leave to the "co-parent," i.e. the person who shares the life of the biological parent of a child regardless of their gender, and maintenance by Orange at 100% of the gross basic wage for employees who do not receive social security compensation.

Commitment to the inclusion of people with disabilities

Regarding the inclusion of people with disabilities in particular, Orange has been producing a biannual international report on "disability, neurodiversity and accessibility" within the Group since 2023. The aim of the report is to assess the initiatives put in place by the Group concerning the employment of and support for employees with disabilities (recruitment, integration and support, employee awareness, workstation adaptation and adjustments to the work environment), as well as those concerning inclusive customer experience and innovation, responsible purchasing practices, sponsorship actions and support for entrepreneurship. An updated version of this report was published in September 2025, based on 2024 baseline data, on the Orange website⁽³⁹⁾.

It was produced with contributions from 49 entities present in 36 countries representing 92% of the Group's workforce. The report showed a 7.90% increase in the number of people recognized as having a disability compared to the end of 2022, the date of the first report.

Orange SA also reaffirmed its commitment to the inclusion of people with disabilities by signing a new agreement with the representative trade unions on March 24, 2025. This agreement, applicable from 2025 to 2027, demonstrates the desire to foster an increasingly inclusive work environment, where everyone enjoys the same opportunities for professional success. The aim is to provide heightened support at each key moment of the employee's career, also including the manager and the work group, while respecting everyone's confidentiality and wishes. This agreement includes proactive and appropriate measures to encourage the recruitment and retention of employees with disabilities by:

- adopting an inclusive employment policy that incorporates targets for recruiting employees with disabilities on permanent contracts, fixed-term contracts and work-study contracts;
- strengthening the digital accessibility requirements and supporting teams that specialize in this field;
- maintaining a dedicated provisional budget and strengthening the role of actors focused on disability;
- creating a framework and appointing dedicated actors who make sure that accessibility is fully taken into account in real estate projects;
- supporting innovation, to encourage fresh ideas in the field of disability.

In addition, a specific commitment has been made to neurodiversity in order to take cognitive diversity into account in the company. Orange launched the "Neuroteam" program in April 2021 with the objective of recruiting, supporting and retaining neurodivergent people and putting their expertise to use. The Group made its manifesto public and, in December 2022, on International Disability Day and World Equal Opportunities Day, promoted the initial outcomes of the program: an inspirational conference, an e-learning course, a guide and employee testimonials.

In 2024, Orange was one of the founding members of the "Objectif Neuroinclusion" (Objective: Neuroinclusion) collective, which aims to foster the development of a neuroinclusive culture and practices within companies. This collective was officially launched on October 15, 2025 at an inter-company event dedicated to neurodiversity.

4.3.2.3.2.4 Promote the Group's commitments externally

Commitment and partnerships for inclusion

Orange is committed to promoting diversity, inclusion and equal opportunities through the many partnerships it has forged and charters it has signed. These commitments help communicate the values that drive Orange internally and externally.

Since 2015, the Group has signed the Women's Empowerment Principles of UN Women and teamed up with the OnelnThreeWomen international initiative and the *StOpE Sexisme* initiative in France. The aim is to combat all forms of violence against women both in and outside the workplace.

Orange has been a signatory to the International Labor Organization (ILO) "Enterprise and Disability" charter since 2015 and is a member of the International Labor Organization – Global Business and Disability Network (ILO GBDN) business collective. At the end of 2024, the Group's Chief Executive Officer signed, on the Group's behalf, the Business Leaders' Pledge on Disability-Inclusive Sustainability Practices, launched by the ILO GBDN. In 2019, the Group joined the global movement, The Valuable 500, which brings together the 500 largest companies committed to promoting the inclusion of people with disabilities.

The Group is also a signatory to commitment charters, such as the charter of L'Autre Cercle – the Group's Chief Executive Officer renewed Orange's commitment to this charter in 2025 – and the UN Corporate Standards of Conduct on Tackling Discrimination against LGBTI people. Since 2024, Orange has been a member of the European Pride Business Network (EPBN), which in 2025 celebrated the first 25 LGBTIQ+ Leaders Europe role models, one of whom was the Chief Executive Officer of Orange Business. Since 2008, Orange has also been a supporter of the *Mobilisnoo* internal network of LGBT+ employees and friends.

In 2025, Orange joined the Engage & Care Corporate Coalition with 11 other international companies to make concrete progress on social protection issues. In this context, Orange is working on key topics such as adequate wage and mental health.

Employees' social engagement

Within Orange SA, each employee can, with their manager's approval, spend up to two full days of their working time per year on actions initiated and organized by the Group or with associations recognized by the company. These days also help develop the sense of belonging, maintain engagement and retain new hires. Since 2024, employees in the Africa & Middle East region have been able to take three days to participate in environmental or inclusion initiatives through the Orange Engage for Change platform.

(39) 2025 Disability, Neurodiversity, and Accessibility Report : <https://gallery.orange.com/element?id=476631#iss=https%3A%2F%2Fauth.keepeek.com%2Fauth%2Frealms%2Fmastermedia>

This engagement can also take place within the framework of the *Hello Women* program or with a view to helping people with professional integration and career development through mentoring. Between 2020 and 2024, over 480 Orange employees participated in these initiatives since the program was launched.

Orange also promotes the link between the nation and its armed forces in France, with dedicated programs to support this commitment to the reserves, such as tailored HR processes to manage occasional leave, or support for the solidarity initiatives of its reservists, such as a reference to the recruitment of wounded servicemen and servicewomen in the disability agreement, or assistance in retraining servicemen and servicewomen or their spouses through an agreement with Défense Mobilité signed in 2022. Orange supports the Orange Association of Veterans and Reservists of Orange (*Association des Anciens Combattants et Réservistes d'Orange* – ACRO) created in 2024, whose purpose is to group together the various forms of military commitment in France and to fulfill a memorial duty. There are also specific mechanisms for Orange employees who are volunteer firefighters.

Arrangements can be made for employees who want to get involved in local government. In order to promote local democracy, additional days of leave are given to employees for the period when they are running for political office, and working time adjustments and special leave authorizations are provided for locally elected employees.

4.3.2.3.3 S1-5 – Targets related to managing the material impact and risk concerning employee engagement

As part of the equal pay action plan, Orange has set a target of striving for equal pay for women and men in comparable roles by 2025 in each of the Group's regions, while taking local characteristics into account.

This metric measures the correct application of the compensation & benefits policy, the aim of which is to determine how Orange pays its employees based on values of equity and non-discrimination.

This target has been the subject of a consultation with stakeholders and is being monitored within the framework of the global agreement on equality in the workplace within the Group.

4.3.2.4 Management of health and safety-related IROs

In its double materiality analysis, Orange identified a negative impact of harm to employees' physical and mental health (occupational accidents, conflict areas, climate-related hazards, etc.), as well as a risk of a decrease in productivity due to occupational accidents or absences due to illness, and a reputational risk and risk of penalties in the event of a breach of personal safety. In response to these impacts and risks, increasing prevention is a virtuous approach that also provides an opportunity to improve employee engagement, well-being at work and thus retention, as well as the company's performance. This approach is reflected in various action plans carried out in 2025 that meet the objectives defined in Orange's health, safety, quality of life and working conditions policy (OHS policy).

4.3.2.4.1 S1-1 – Policies related to own workforce linked to health and safety

Orange's commitment to occupational health and safety is addressed by General Management given its responsibility and the associated financial and legal risks. Orange's policy aims to limit the impact that Orange's activities or the transformations carried out by the company to support its development may have on the physical or mental health of individuals, whether they are employees or partners.

At a time of increasing requirements related to the environmental transition, technological changes, longer working lives, changes in professions, the development of new forms of work organization and new individual aspirations, Orange is convinced of the need to strengthen its occupational risk protection culture.

4.3.2.4.1.1 Occupational health and safety policy

In a policy memo signed in 2023 by the Group's Executive Vice President in charge of Human Resources, which is based on the recommendations of the World Health Organization (WHO) and the conventions of the International Labor Organization (ILO), Orange confirmed that topics relating to occupational health and safety (OHS) for all Group employees are an absolute priority to ensure the Group's success and sustainability. The three policy guidelines are aligned with the company's 2025–2030 strategy and the Group's CSR approach:

- strengthen trust through safe, peaceful working conditions;
- enhance the performance of initiatives to improve employees' working conditions and well-being by standardizing and sharing best practices;
- aim for excellence by strengthening the primary prevention culture (by reducing causes and risk factors).

This commitment is consistent with and based on a global health and safety agreement signed with the trade unions in November 2014 for all employees. The agreement lays down a common foundation for action for the Group in terms of occupational health, safety, quality of life at work and health protection in general. Based on a participatory approach involving all stakeholders, including social dialogue in the field of occupational health and safety, it also includes the particular vigilance needed with regard to the occupational health and safety policy specific to Orange's partners and subcontractors that preceded the law on the duty of vigilance and the ISO 45001 international standard dated 2018.

The policy aims to ensure employees' safety, protect their health and improve their quality of life at work. It covers all employees in the Group's divisions and subsidiaries, across all Group regions, as well as all stakeholders, partners, subcontractors and people who may be affected by the Group's activities, and in their interactions with Orange.

To that end, the policy is broken down into four main objectives set out in a three-year health, safety, quality of life and working conditions (QLWC) roadmap, which is reviewed regularly so it can be adjusted and enhanced:

- implement an occupational health and safety management system (OHSMS);
- apply common principles to all;
- monitor and provide disclosure on performance indicators;
- implement regular employee listening.

Implementation of the policy is coordinated at the Group level by the Health and Safety Prevention Department. Its operational implementation by all the divisions, subsidiaries and their component entities takes their own laws and local contexts into account, and gives priority to soliciting regular feedback from managers, employees and their representatives and to analyzing their needs and expectations.

The Group's entities can, as needed, set up employee support programs to help them achieve a better work-life balance (parenthood, employees who are caregivers, etc.) and support public health programs. In addition, remediation measures are carried out by the divisions, which mobilize the HR and legal departments and, if necessary, dedicated units, as is the case in France (see Section 4.3.1.2.3 *Remediation procedures* and Section 4.3.2.7 *S1-3 – Processes to remediate negative impacts and channels for own workforce to raise concerns*).

A dedicated Intranet site has been developed for the policy and the various communication materials useful for its roll-out. It is available to occupational health and safety and QLWC stakeholders, such as prevention specialists, human resources Directors and Officers, and managers. In particular, the policy is presented in a video that is gradually being incorporated into the employee health, safety and QLWC onboarding modules.

These principles, which relate to the Group's obligations of means and of result with respect to occupational health and safety or enhanced prevention within the meaning of French regulations, are also included in the global health and safety agreement negotiated with staff representatives at the Group level.

4.3.2.4.1.2 Group security policy

The Group security policy includes a personal safety component (see Section 2.1.3.3 *Group security policy* and Section 4.3.5.2.3.1 *Group security policy*).

4.3.2.4.2 S1-4 – Taking action on the material impact and risk related to own workforce, and effectiveness of those actions linked to health and safety

Various action plans were carried out in 2025 and met the objectives defined in Orange's health, safety, quality of life and working conditions policy (OHS policy).

Orange does not have a systematic process for identifying the resources associated with each action and discloses this information in part.

4.3.2.4.2.1 Implement an occupational health and safety management system

The objective of implementing an occupational health and safety management system (OHSMS) complies with the Group's duty of vigilance as well as its enhanced prevention obligation in accordance with French Law 2021-1018 of August 2, 2021 on strengthening occupational health. This system must be implemented in close coordination with the teams, and its effectiveness must be assessed regularly as part of a continuous improvement approach, based on international standard ISO 45001, which the Group selected as a reference (see Section 4.3.2.8.6 *S1-14 Health and safety metrics*).

In 2025, the actions carried out focused on the ongoing roll-out, with diagnostics performed in the main entities of the Group that were not yet covered; this work will continue in 2026. In addition, educational and information-sharing workshops, called "Rendez-vous Prevention" (prevention meet-ups) have been developed to strengthen the skills of the community of Health, Safety and QLWC stakeholders.

Progress has also been made on the project to harmonize and automate occupational health and safety (OHS) management processes, with the first roll-out completed in the Orange France scope, and preparations for a future pilot for Orange Business internationally.

4.3.2.4.2.2 Raising awareness among employees in all Group regions

The objective of raising employee awareness meets the regulatory obligations. At the Group level, this translates into organizing a World Day for Safety and Health at Work (April 28) and a World Mental Health Day (October 10), focusing on common themes that reflect a commitment to applying common principles to all.

A Group action program dedicated to mental health was rolled out in 2025. This specific program aims both to train HR and prevention stakeholders and to raise awareness of mental health among employees by guaranteeing them access to support, regardless of their place of work.

Supported by a multidisciplinary working group, bringing together QLWC representatives and occupational physicians, it includes French and international perspectives on a topic that is increasingly crucial for the health, safety and QLWC expert community. In 2025, following a survey of this community of experts, 89% of respondents considered that mental health is an issue for their entity, compared with 84% in 2024. In addition, 68% believe that this topic is becoming more and more important, compared with 45% the previous year.

The first step of this program, developed in 2025, was an awareness-raising cycle, consisting of webinars addressing the fundamentals (vocabulary, identification of weak signals, prevention), as well as topical themes, such as artificial intelligence, ecology and prevention of eco-anxiety. These webinars were released to all employees on October 10, World Mental Health Day.

The Group also collaborates with external partners to develop benchmarks, share best practices with large groups and help draft publications on mental health.

This action plan is a process of continuous improvement and has no defined time horizon.

4.3.2.4.2.3 Anticipate the impacts of climate change on employees

The objective is to define strategic guidelines, mobilize resources and take concrete actions to anticipate and limit the impact of climate-related hazards, both on infrastructure and on the Group's human resources and their working conditions.

In 2024, Orange launched a strategic approach aimed at anticipating and managing climate change risks by strengthening the resilience of its infrastructure and teams. This initiative was approved by the Executive Committee and aims to ensure continuity of services while preserving the health and safety of employees and subcontractors (see Section 4.2.2.1.2.4 *Exposure, vulnerabilities and financial quantification of physical risks*).

In 2025, the divisions, which had been made aware of these issues, approved the integration of Occupational Health and Safety (OHS) experts into the working groups of the divisions and entities. Governance has therefore been established, bringing together climate officers, risk managers, business continuity managers and OHS representatives to coordinate actions, share best practices and better anticipate extreme situations, including climate disasters.

4.3.2.4.2.4 Learning from the results of the three-year working conditions and stress survey

The three-year collective working conditions and stress survey at Orange SA was conducted from December 2 to 21, 2024, with a participation rate of 48.7%, an increase of 5.4 points compared to the previous survey in 2021. An analysis showed that the level of work-life balance, the adjustment of targets, the meaning of work and managerial support remained strengths and support points. There was also a notable improvement in the level of stress felt during customer-facing activities.

Key areas of focus, and thus the subject of action plans, mainly include regulating the workload, supporting transformation projects and addressing concerns about the future, particularly secure employment. Those concerns were included in the discussions that led in particular in 2025 to the signature of the Employment and Career Path Planning agreement.

4.3.2.4.2.5 Supporting the Group's transformations in France

With regard to changes in working conditions, particular attention is also paid to supporting employees in transformation projects seeking to improve the Group's operational efficiency, including an appropriate system for feedback.

In France, as part of these transformation projects, Orange SA employees are supported using a robust and adaptable methodology to prevent psychosocial risks. In compliance with regulatory and contractual provisions, the responsible approach to transformation projects takes the form of human work impact studies, which are presented to various social dialogue bodies and commissions. The analysis is based on the Gollac grid from the French Directorate of Research, Studies and Statistics Coordination (*Direction de l'Animation de la Recherche, des études et des Statistiques* – DARES, the statistics unit that supports France's Ministry of Labor). It may be supplemented, for example, by conducting surveys among employees.

Support is provided over the long term and helps to familiarize project management teams and managers with the psychosocial risks, improve risk prevention for Orange employees, and ensure that action plans address the risks assessed. It is based on an approach of co-constructing organizations locally and serves to strengthen managerial support, according to needs, through a phase of collective or individual interviews by business line and by region, which may be supplemented by work site observations carried out by those involved in prevention work. An HR assessment takes the form of a survey offered to employees between six and nine months after the roll-out of the new organization, in order to assess the effectiveness of the action plans implemented by the company, and to propose any adjustments required as part of the continuous improvement process.

4.3.2.4.3 S1-5 – Targets related to managing the material impact and risk concerning health and safety

Orange does not disclose a target in its 2025 sustainability statement for completion of the action plans to manage the material risk concerning health and safety. Orange nevertheless uses indicators such as the frequency rate of occupational accidents (number of occupational accidents with lost time per million theoretical hours worked) to measure the effectiveness of its policy and action plans.

4.3.2.5 Management of IROs related to privacy

As part of its double materiality analysis, Orange has identified one financial risk in the event of a breach of the security of employees' personal data.

4.3.2.5.1 S1-1 – Policies related to own workforce linked to privacy

The framework for managing the material financial risk incurred in the event of any failure to protect employees' personal data is based on the personal data protection policy described in Section 4.3.5.2.3.2 *Personal data protection policy*.

In addition, in 2024 Orange formalized five commitments in a charter applicable to the entire Group, allowing employees to exercise their rights over the processing of data concerning them. These commitments are confidentiality, accountability, respect, proportionality and transparency.

4.3.2.5.2 S1-4 – Taking action on the material risk related to own workforce, and effectiveness of those actions linked to privacy

Orange's action plan aims to disseminate widely its charter, available in nine languages on the Group's Intranet and underpinned by a support and training program on the Orange Learning platform.

Orange produces a regularly updated information notice on personal data protection, accessible from the Intranet, to inform employees about the processing of their data and the procedures for exercising their rights.

Training courses are offered on various subjects, such as personal data protection and "privacy by design" for project actors and more specifically for HR professions.

More specifically, in 2025, under the AI Act, Orange makes online training modules available to employees on the Orange Learning platform. Topics include ethical and responsible AI and generative AI for team managers.

Regarding the use of generative AI, Orange has also drafted a charter that provides information on the internal generative AI solution for Orange employees and service providers who have access to the platform.

In addition, in 2025, Orange published new guidelines on AI specifically for HR departments on the topic of personal data.

4.3.2.5.3 S1-5 – Targets related to managing material risk concerning privacy

Considering the nature of the issue and Orange's current procedures for protecting employees' personal data, Orange does not disclose a target related to the material financial risk in the event of a failure to protect employees' personal data, and does not disclose metrics related to this risk in its 2025 sustainability statement.

4.3.2.6 S1-2 – Processes for engaging with own workforce and workers' representatives

Orange maintains a constant social dialogue and has developed tools for international social dialogue, in addition to the social dialogue that takes place in the Group's companies, according to the rules and practices applicable locally.

4.3.2.6.1 Orange-UNI global union Alliance

Within Orange, the national unions that are members of the UNI global union international trade union federation are organized into an alliance: the UNI Orange Global Trade Union Alliance. In 2025, around 20 European and African unions present at Orange joined the Alliance. Indeed, Orange has long engaged in a high-quality dialogue with the UNI global union, which represents more than 20 million workers in 150 countries working in the services sector, including the telecommunication sector.

The joint declaration (known as the "Douala Declaration") signed in 2018 governs the functioning of the UNI Orange Global Union Alliance and reaffirms the importance of a global social dialogue. This declaration provides for two formal annual meetings between Orange Management and the Orange UNI global union Alliance, which was the case in 2025.

The meetings are an opportunity to take stock of progress concerning the roll-out of the global agreements. They also allow for an open debate on matters of global interest such as artificial intelligence and its possible impacts.

Orange has signed three global agreements with UNI global union. These agreements define principles that apply to all employees of Orange companies:

- the global agreement on fundamental social rights (see Section 4.3.1.2.1 *Content of the global agreement on fundamental social rights*);
- the global health and safety agreement (see Section 4.3.2.4.1.1 *Occupational health and safety policy*);
- the global agreement on gender equality in the workplace within Orange (see Section 4.3.2.2.1.3 *Diversity, equity and inclusion policy*).

4.3.2.6.2 European Works Council

The Orange European Works Council was created by an agreement dated April 14, 2004. It represents the Group's employees in the European Union and the European Free Trade Association (EFTA, including Norway and Switzerland). Currently, it is composed of 23 employee representatives from 18 countries.

The council is a forum for discussions and social dialogue on economic, financial and social issues. It deals with matters that concern all Group companies, or at least two companies in two member countries. Management informs and consults European employee representatives on any major decisions at European level that could impact working or employment conditions.

The agreement provides that the council will meet at least three times a year. In reality, it meets more often due to the internationalization of the transformation projects. In 2025, the council met seven times.

4.3.2.6.3 Worldwide Works Council

The Orange Worldwide Works Council was created by an agreement dated June 23, 2010. It represents the Group's employees in all the regions where Orange is present and has more than 400 employees. Currently, it is composed of 34 employee representatives from 27 countries.

This council is a forum for social dialogue allowing information to be exchanged on economic, financial and employee-related issues with a transnational impact. It enables the sharing of the Group's strategy and challenges. This body is part of Orange's Corporate Social Responsibility development strategy. A representative of the Worldwide Works Council participates, without a vote in resolutions, in some of the meetings of Orange's Board of Directors.

The Worldwide Works Council meets at least once a year. *Ad hoc* meetings may be organized if necessary. Meetings are chaired by the Group's Executive Vice President in charge of Human Resources. In 2025, the Council met in June, with a presentation of the strategy by the Chief Executive Officer.

4.3.2.6.4 Local social dialogue

Neither the European Works Council nor the Worldwide Works Council are replacements for the national representation bodies in place and governed by local regulations.

As regards social dialogue in France, in 2025, the Corporate Social and Economic Committee of UES Orange (CSEC) met 22 times, mainly for recurring information-consultation meetings (strategy, the company's economic and financial position, social policy, employment and working conditions), for discussions on health and safety, and for *ad hoc* information-consultation meetings, mainly concerning changes in the organization and structure of the Group.

The French Works Council, which brings together the Group's subsidiaries in France with employees, met four times during fiscal year 2025, dealing with information relating to the Group's financial position, business and employment trends.

4.3.2.7 S1-3 – Processes to remediate negative impacts and channels for own workforce to raise concerns

Orange has set up a whistleblowing system, *Hello Ethics*, which is open to all employees of the Group to enable them to file reports on conduct or situations that seriously violate human rights and fundamental freedoms and the health and safety of persons (see details in Section 4.4.2.4 *Group whistleblowing system*).

Employees are regularly provided information on *Hello Ethics* and on local systems through training courses and communication campaigns (emails, Intranet, site posters, etc.). In France, Orange has provided its employees with an additional system. This is an external feedback and advice service for all employees and for applicants to Orange job offers. Employees or candidates who consider themselves victims of discrimination can contact this service to explain the situation, obtain legal advice on their rights and, where appropriate, assistance with their approach.

Orange has also put in place in France a comprehensive system to prevent, detect and handle all situations of harassment, sexism and violence in the workplace (HSVT) (see Section 4.3.1.2.3 *Remediation procedures*).

Orange relies on a preventive approach to the negative impact on employees' health and safety. In the case of a confirmed situation, the incident is handled in accordance with local legislation.

4.3.2.8 S1-6 to S1-17: Metrics

4.3.2.8.1 S1-6 – Characteristics of the undertaking's employees

4.3.2.8.1.1 The Group's workforce

Active workforce broken down by geographical area at the end of the period	2025		2024		2023	
	Headcount	As a % of the consolidated workforce	Headcount	As a % of the consolidated workforce	Headcount	As a % of the consolidated workforce
France	67,648	54.8%	70,771	55.8%	73,263	53.4%
Other European countries	25,260	20.4%	26,255	20.7%	32,852	24.0%
Africa	23,035	18.7%	22,157	17.5%	21,828	15.9%
America	1,083	0.9%	1,117	0.9%	2,383	1.7%
Asia Pacific	6,477	5.2%	6,609	5.2%	6,768	4.9%
Group Total	123,503	100%	126,909	100%	137,094	100%

The Orange group data communicated for the 2025, 2024 and 2023 fiscal years cover 100% of the Group's consolidated workforce. No *pro forma* information has been prepared for previous years under the sustainability statement.

Present in 78 countries, Orange had 123,503 active employees at end-December 2025, 55% of whom were in France.

Active workforce broken down by gender at the end of the period	2025		2024		2023	
	Headcount	As a % of the consolidated workforce	Headcount	As a % of the consolidated workforce	Headcount	As a % of the consolidated workforce
Women	43,578	35.3%	44,998	35.5%	49,684	36.2%
Men	79,925	64.7%	81,911	64.5%	87,410	63.8%
Group total	123,503	100%	126,909	100%	137,094	100%

Active workforce broken down by gender and type of contract at the end of the period	2025		2024		2023	
	Headcount	As a % of the consolidated workforce	Headcount	As a % of the consolidated workforce	Headcount	As a % of the consolidated workforce
Permanent contract (permanent workers)	121,242	98.2%	124,876	98.4%	134,654	98.2%
Of which women	42,773	35.3%	44,197	35.4%	48,666	36.1%
Of which men	78,469	64.7%	80,679	64.6%	85,988	63.9%
Fixed-term contract (temporary workers)	2,261	1.8%	2,033	1.6%	2,440	1.8%
Of which women	806	35.6%	801	39.4%	1,017	41.7%
Of which men	1,455	64.4%	1,232	60.6%	1,423	58.3%

The Orange group data communicated for the 2025, 2024 and 2023 fiscal years cover 100% of the Group's consolidated workforce.

At end-December 2025, 121,242 people had a permanent contract, i.e. 98.2% of the total workforce.

The number of employees on fixed-term contracts stood at 2,261 people, up 11.2% at Group level. This additional workforce, which represented 1.8% of the workforce at the end of 2025 (0.2 points up compared to 2024), is marginal.

In addition, 3,631 young people on work-study contracts completed the workforce, mainly in France, with Orange continuing to maintain its commitment to the integration of young people.

This information is consistent with the information presented in the financial statements in Section 3.3. *Consolidated Financial Statements* – Note 6 – *Employee benefits*.

MDR-M – Note on methodology

The workforce data correspond to employees considered “consolidated assets” on the last day of the month, which also represents the employees of joint operations.

Active employees are employees who are currently employed and not on temporary leave (inactive: on long-term sick leave, leave of absence, unpaid leave, etc.), whether they are on a fixed-term contract or a permanent contract, regardless of their working hours schedule (part-time or full-time). The active employees taken into account are up to the level of the undertaking’s financial consolidation rate. Work-study contracts (apprenticeship and professionalization contracts) are excluded.

These employees may be divided according to different lines of analysis (gender, type of contract, geographical area, etc.).

The France workforce is presented separately, as it represents a significant proportion of the Group’s total workforce (more than 50,000 employees and more than 10% of total workforce).

The data are communicated as numbers of employees and as percentages, when relevant, for ease of comprehension. No *pro forma* information has been prepared for previous years under the sustainability statement.

The data primarily come from the HR information system and are supplemented by and compared with data from the Group’s financial information system. This information is collected and updated on a monthly basis.

4.3.2.8.1.2 Number of departures and turnover rates

	2025	2024	2023
Number of employees who left the company	10,309	10,916	11,553
Turnover rate (including retiring employees)	8.3%	8.1%	8.6%

The Orange group data communicated for the 2025, 2024 and 2023 fiscal years cover 100% of the Group’s consolidated workforce.

Permanent departures from the Group of employees on permanent contracts in 2025 were 10,309, down 5.6% (i.e. -607) compared to 2024; the turnover rate was 8.3%.

It takes into account only departures of active employees on permanent contracts. Departures of inactive employees are not included in these metrics.

MDR-M – Note on methodology

The “number of employees who left the undertaking” metric corresponds to the number of resignations, retirements, lay-offs, contractual terminations, deaths and temporary entries/exits.

The “turnover rate” is the total number of definitive departures (resignations, retirements, lay-offs, contractual terminations, deaths and temporary entries/exits) divided by the number of permanent contracts in the previous year. This metric takes into account retirements.

4.3.2.8.2 S1-8 – Collective bargaining coverage and social dialogue

	2025	2024
Collective bargaining coverage rate (as a % of total consolidated active workforce at the end of the period)	97.5%	97.4%

Collective bargaining coverage rate Geographic areas	Percentage of total consolidated active workforce at the end of the period	Percentage of employees covered by workers’ representatives at the end of the period
France	100%	100%
Other European countries	89.4%	-
Africa	98.5%	-
America	99.9%	-
Asia-Pacific	98.7%	-

The Orange group data communicated for the 2025, 2024 and 2023 fiscal years cover 100% of the Group’s consolidated workforce.

In France, 100% of active employees are covered by a collective bargaining agreement.

Similarly, 100% of employees are covered by employee representatives in France (local representatives or CSEC representatives). This metric is based solely on the Orange SA scope, which constitutes 81% of the workforce in France. Information is not available for the rest of the France scope.

In addition, an agreement is in place with Orange employees for representation by a European Works Council (European Group Works Council) as described in Section 4.3.2.6.2 European Works Council, as well as a Group body for all employees (see Section 4.3.2.6.3 *Worldwide Works Council*).

MDR-M – Note on methodology

Collective bargaining agreements include any company-wide and intercompany agreements, including collective agreements. The coverage rate is the ratio of the workforce concerned covered by a collective bargaining agreement to the total active workforce, and is reported as a percentage of total workforce. Note that all employees of the Group are concerned by the framework agreements signed with UNI global union, regardless of the type of contract (permanent contract or fixed-term contract) or their working hours schedule.

The trade union representation metric is shown for France. It represents the rate of employees covered by employee representatives (union representatives or local representatives). The number of local representatives is negotiated every four years in the agreements on social dialogue.

4.3.2.8.3 S1-9 – Diversity metrics

4.3.2.8.3.1 Gender diversity

Breakdown by gender in the management networks	2025		2024		2023
	Headcount	As a % of the active workforce part of the management network	Headcount	As a % of the active workforce part of the management network	As a % of the active workforce part of the management network
Women	420	36.0%	423	35.6%	34.1%
Men	746	64.0%	764	64.4%	65.9%
Total	1,166	100%	1,187	100%	100%

The Orange group data communicated for the 2025, 2024 and 2023 fiscal years cover 100% of the Group's workforce in management networks.

The proportion of women in the management networks was 36% in 2025, confirming the achievement of the target set in 2020 for the end of 2025. This was accomplished thanks to the special attention paid to women among emerging talents to enable them to feed into the talent pools for positions of responsibility, mainly through specific programs such as Women Up (see Section 4.3.2.2.2.6 *Implementing actions and programs for women*).

MDR-M – Note on methodology

The gender diversity data are based on the Group's workforce as defined in Section 4.3.2.8.1.1 The Group's workforce.

In accordance with the requirements of the CSRD, Orange chooses to apply its historical definition of "top management." This is defined within the Group as part of the "Executive and Leaders" management network and includes managers who hold positions of great responsibility within the Group. The data are reported as numbers and percentages.

4.3.2.8.3.2 Age diversity

Active workforce broken down by age groups	2025		2024		2023	
	Headcount	As a % of the consolidated workforce	Headcount	As a % of the consolidated workforce	Headcount	As a % of the consolidated workforce
Younger than 30 years old	13,848	11.2%	14,853	11.7%	17,246	12.6%
Between 30 and 49 years old	62,696	50.8%	64,578	50.9%	74,864	54.6%
50 years old or older	46,959	38.0%	47,478	37.4%	44,984	32.8%
Group total	123,503	100%	126,909	100%	137,094	100%

The Orange group data communicated for the 2025, 2024 and 2023 fiscal years cover 100% of the Group's consolidated workforce.

The Group's active workforce is multigenerational, with one in two employees between 30 and 49 years old. The average age is stable, at 44.4 years for all Group employees (44.2 years in 2024) and reveals a difference between France (47.6 years) and abroad (40.5 years).

4.3.2.8.4 S1-10 – Adequate wages

All Orange employees are paid an adequate wage, in line with applicable benchmarks.

MDR-M – Note on methodology

The adequate wage is defined at the Group level. Each entity is required to meet the minimum adequate wage level for its region. The "adequate" wage is determined using the methodology of the Fair Wage Network, which awarded Orange certification in November 2025 (see Section 4.3.2.3.2.2 *Ensuring pay equity*).

4.3.2.8.5 S1-13 – Training and skills development metrics

	2025	2024	2023
Average number of training hours per employee	20.4	22.5	21.1

The Group data disclosed for the 2025 fiscal year cover 99% of the Group's consolidated workforce.

The Group data disclosed for the 2023 and 2024 fiscal years cover 98% of the Group's consolidated workforce.

The 2025 training rate is in line with the average of past years. The change compared to 2024 is due to the different nature and duration of the training courses received by employees in 2025.

MDR-M – Note on methodology

The data are reported by average headcount over the year and relate to active permanent contracts and fixed-term contracts regardless of their working hours schedule (full-time or part-time). French part-time for senior plans (TPS) that are on time off work, work-study contracts (apprenticeship and professionalization contracts) and trainees are excluded.

The Group data disclosed on training comes from two types of reports: one via the Group's Orange Learning tool, currently being rolled out in all subsidiaries worldwide, and the other via monthly reporting from subsidiaries using their own information systems in addition to Orange Learning.

The number of training hours per employee is an average calculated on the basis of the number of training hours divided by the average monthly number of active employees over the year.

4.3.2.8.6 S1-14 – Health and safety metrics

	2025	2024	2023
Percentage of employees covered by an audited Health and Safety Management System (as a % of the registered workforce at the end of the period)	67%	59%	N/A
Number of fatal occupational accidents or deaths due to occupational diseases	3	1	5
Number of fatal occupational accidents or deaths due to occupational diseases among subcontractors in our workplace	1	2	5
Number of occupational accidents with lost time	516	569	492
Frequency rate of occupational accidents (including occupational accidents with lost time and fatal occupational accidents) (Number of occupational accidents with lost time and fatal occupational accidents per million theoretical hours worked)	2.46	2.67	2.46

The Orange group data communicated for the 2025 fiscal year cover 96% of the Group's consolidated workforce.

The Orange group data communicated for the 2024 fiscal year cover 95% of the Group's consolidated workforce.

The Orange group data communicated for the 2023 fiscal year cover 84% of the Group's consolidated workforce.

The Group Health and Safety and QLWC policy signed in 2023 is leading Group entities to gradually adapt their occupational health and safety management systems (OHSMS) to comply with international standard ISO 45001. At end-2025, 19 entities were ISO 45001-certified, based in 12 countries. The number of employees covered by an OHSMS is increasing. This metric considers the number of employees at entities reporting that they have an OHSMS audited by an external organization or certified according to ISO 45001 or its equivalent, as a proportion of the Group's total number of employees. To help improve this metric, a gap analysis program was launched at the end of 2024, which covers 2025 and 2026.

Three fatal accidents were disclosed in 2025, which occurred at home on teleworking days, for Orange SA.

After a sharp increase in 2024, the number of occupational accidents in the Orange SA scope fell significantly (-16% compared to 2024 and -9% compared to 2023). Of the accidents occurring in this scope, 30% of the accidents concerned falls (slips and trips, falls from a height, or on stairs), 21% handling and transport of goods, and 20% suddenly taking ill. It remained stable compared to 2024 in the subsidiaries.

MDR-M – Note on methodology

The data relate to permanent contracts and fixed-term contracts recorded, regardless of their working hours schedule. Accident data also include apprenticeship contracts and internship agreements.

They are based on the information systems in place at Group and entity level and are consolidated automatically in the case of Orange SA or reported by the subsidiaries on a quarterly basis.

Accidents reported by the entities comply with local regulations.

The number of occupational accidents corresponds to the number of victims regardless of their working hours (part-time or full-time) and regardless of the working conditions in which the accidents occurred (teleworking, business trip or work assignment). This number does not include commuting accidents while traveling between a person's place of residence and their place of work.

The frequency rate of occupational accidents corresponds to the number of occupational accidents with lost time (including fatal accidents) as a proportion of the volume of hours worked, expressed in millions of hours [(number of occupational accidents with lost time/number of hours worked) × 1,000,000].

At this stage, consolidated monitoring of accidents without lost time is not yet feasible. An action plan is being rolled out to enable Orange to eventually implement frequency rate monitoring that includes accidents with and without lost time. Health and safety data, particularly those relating to occupational accidents, may change from year to year after incidents are reassessed. The data transmitted by the entities, in particular accident data and the status of the OHSMS, are mainly declarative.

4.3.2.8.7 S1-16 – Compensation metrics

As a percentage of men's pay	2025	2024
Unadjusted gender pay gap	4.1%	4.4%

Scope covered: Orange SA.

The ratio of the annual total remuneration of the highest paid person to the median annual total remuneration of all employees is equal to the internal pay ratio presented in Section 5.4.1.2. Amount of compensation paid or allocated to Corporate Officers for 2025.

MDR-M – Note on methodology

The concept of payroll used is that of the electronic payroll reporting system in France (*Déclaration Sociale Nominative – DSN*).

It is composed of all the elements of gross compensation paid during the year to employees on active permanent contracts, calculated on the basis of full-time employment: gross index-linked salary or base salary, additional salary, monetary benefits, variable

compensation (commercial, management, sales), job-related bonuses and allowances (working hours, arduous work, mobility), assignment-related bonuses and allowances, and family situation-related bonuses and allowances.

The metric is expressed as a percentage of men's average pay.

4.3.2.8.8 S1-17 – Incidents, complaints and severe human rights impacts

	2025
Number of complaints filed through channels for people to raise concerns related to our own workforce	59
Of which complaints related to discrimination incidents	51
Of which complaints related to severe human rights issues	0
Of which other complaints (health and safety)	8
Of which cases of non-respect of the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work or OECD Guidelines for Multinational Enterprises	0

To Orange's knowledge, no complaints have been lodged by its employees with the national contact points for the OECD Guidelines for Multinational Enterprises.

For 2025, Orange is unable to provide the total amounts of fines or penalties related to discrimination and human rights incidents, as the information from the current tools is not sufficiently granular. This topic is being analyzed so that this information can be published in future years.

MDR-M: Note on methodology

Hello Ethics is used to report violations of laws, regulations, policies and procedures, including severe human rights violations and incidents of discrimination, harassment, sexism and violence in the workplace. This system is accessible externally and internally on the Internet.

Orange discloses the total number of reports received and the breakdown of whistleblowing reports collected on *Hello Ethics* by domain covered in Section 4.4.2.4 *Group whistleblowing system*.

The incidents regarded as coming under company's employees are situations considered to have merit (therefore excluding complaints that come under customer services, duplicates or empty or irrelevant reports) before investigation and that involve an Orange employee as the alleged perpetrator.

The data provided here relate only to reports collected on *Hello Ethics* and to systems specific to France. They do not take into account other systems rolled out in the Group.

4.3.3 ESRS S2 – Workers in the value chain

Matters for Orange	Impacts, Risks, Opportunities	Policies	Main action plans
Working conditions and human rights within the value chain	Negative impact related to a lack of respect for the human rights of workers in the value chain	Group human rights policy Group sourcing policy Orange's commitments to responsible procurement	– Ensure that Orange's expectations in terms of respect for human rights in the value chain are taken into account: supplier code of conduct and CSR clause – Assess and audit suppliers on topics relating to respect for the human rights of workers – Improve knowledge and supporting suppliers on human rights – Promote inclusive and responsible purchasing

4.3.3.1 ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

As part of its double-materiality analysis, Orange has identified one material impact concerning workers in the value chain. This negative impact is related to a lack of respect for the human rights of workers in the value chain (forced labor and child labor, lack of respect for health and safety, working time, adequate wages and freedom of association).

The impact identified appears to be systemic for some suppliers, due to their geographic location and their business sector. Orange's activities are directly connected to long and complex international production chains, within which human rights violations may occur.

As part of its vigilance approach, Orange uses the Verisk Maplecroft tool to assess the risks of the countries in which the Group acts as direct or indirect buyer (see Section 4.3.2.1 *ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model*). This analysis highlights certain particularly sensitive geographic areas where a significant proportion of Orange's suppliers are concentrated and where there is a wide range of human rights protection systems.

Orange also identifies the business sectors of suppliers for whom the categories of workers in the value chain are likely to be negatively impacted, including with regard to the forced labor and child labor aspects. This concerns, for example, employees of suppliers and subcontractors and those who work at Orange sites but are not part of the Group's own workforce in the following sectors:

- mining, network activities, security and maintenance upstream of the value chain;
- distribution, end-of-life equipment processing and call center activities downstream of the value chain.

The types of employees working for joint ventures are not specifically identified in relation to the material impact identified.

4.3.3.2 Management of the IRO related to workers in the value chain

The Group Procurement & Supply Chain (GPS) Department, which reports to the Group Finance, Performance and Development Department, is responsible for procurement and *supply chain* management for Orange. To this end, it defines procurement and *supply chain* strategies and policies for the Group, ensures that they are implemented across all entities and subsidiaries, and manages performance. It is responsible for encouraging the appropriation of CSR commitments by various procurement stakeholders and the application of such commitments in their processes. The Group Procurement and Supply Chain Director reports on the Group's purchasing aims and strategy and their implementation to the Executive Committee at least once a year.

4.3.3.2.1 S2-1 – Policies related to value chain workers

The management framework for the material negative impact is based on the Group human rights policy and the Group sourcing policy, as well as Orange's Commitments to responsible procurement.

4.3.3.2.1.1 Group human rights policy

As part of its human rights policy, Orange describes its human rights commitments for all its stakeholders, including employees in its value chain. This covers all human rights (see Section 4.3.1.1 *Group human rights policy*).

The Group has several thousand suppliers and subcontractors worldwide, mainly in Europe, Asia and Africa. Orange reaffirms its commitment to respecting human rights, both internally and in its relations with its suppliers and subcontractors. One focus of the Group's human rights policy is on business practices, indicating the existence of operational policies for ethics, HR, purchasing and human rights and of agreements such as the one signed with UNI global union. They govern respect for the principles of protection of human rights in the value chain and of remediation in the event of a violation.

Finally, every year, Orange produces its statement on the fight against modern slavery and human trafficking, and indicates the measures that are being taken to combat these risks. The use of responsible and solidarity-based purchasing is one of Orange's responses to support the development of actors that have a positive social impact and respect human rights.

4.3.3.2.1.2 Group sourcing policy

In 2024, Orange adopted a new Group sourcing policy signed by the Executive Director Finance, Performance and Development and the Group Procurement and Supply Chain Director. This policy was updated in 2025. Its main objectives are to continuously improve the Group's operational performance, the protection against supplier-related risks and the fulfilment of the Group's social and environmental commitments. As part of this policy, Orange mainly describes the commitments and respect for human rights that it expects from all its suppliers, subcontractors and partners.

Orange therefore requires its suppliers to comply with its CSR standards and to apply them to their own purchasing processes. It does this in particular by making it a contractual requirement that Group suppliers adhere to a supplier code of conduct and comply with laws and regulations, including CSR clauses in Group framework agreements and in exclusively local contracts.

The Group sourcing policy applies to all Group entities. The country and entity purchasing teams are responsible for its implementation within their scope.

The main points of the Group sourcing policy are made available to all Orange stakeholders on the purchasing portal for suppliers⁽⁴⁰⁾. The new Group sourcing policy has been communicated to all workers affected by its application.

The implementation of the responsible purchasing component of the sourcing policy is overseen by the Responsible Procurement Committee for all Group entities and subsidiaries. This committee ensures the integration of CSR requirements into purchasing processes and contracts, in particular through the CSR clause, the supplier code of conduct and Orange's Commitments to responsible procurement.

As such, the objectives of the Responsible Procurement Committee are to:

- validate the mandatory CSR commitments to be applied to Orange purchasing, as well as the minimum requirements Orange imposes on its suppliers, particularly in terms of respect for human rights;
- support the implementation of these commitments through joint actions by the Group CSR and GPS Departments;
- monitor the proper implementation of these commitments by tracking key performance indicators and the effectiveness of the measures put in place;
- ensure that changes in CSR regulations are anticipated and integrated into purchasing processes.

The role of this committee is also to support the dissemination of CSR culture to buyers through responsible purchasing training and to support CSR risk management through supplier assessments and audits.

4.3.3.2.1.3 Orange's Commitments to responsible procurement

The Group sourcing policy is clarified through the Commitments to responsible procurement updated in 2025, based on the principles of the ISO 20400 standard. These commitments are also based on international standards, including the Universal Declaration of Human Rights, ILO standards, OECD Conventions, as well as the commitments made by Orange, such as the United Nations Global Compact, and the agreements signed in 2006 and 2014 with the international trade union federation UNI global union.

(40) <https://fournisseurs.orange.com/en/our-group-sourcing-policy/>

In accordance with the Group sourcing policy, Orange's Commitments to responsible procurement focus on the following major objectives:

To develop balanced relationships with its suppliers, based on the concepts of trust, respect and the sustainability of the business relationship

To continuously improve the Group's financial performance by creating sustainable value

To manage risks and understand the CSR opportunities related to the Group's purchasing and supply chain

To ensure that the Group and its customers benefit from the know-how of its innovative and efficient suppliers

Orange's Commitments to responsible procurement are formalized in a contract through the CSR clause, which refers to the supplier code of conduct (Group and local suppliers). These commitments are therefore applicable to all its subsidiaries and entities, to the purchasing and *supply chain* activities and to the purchasing delegated to BuyIn, the joint venture between Orange and Deutsche Telekom, in the context of relations with all their suppliers and subcontractors. Like the Group sourcing policy, the main points of Orange's Commitments to responsible procurement are made available to all Orange stakeholders on the purchasing portal for suppliers and on the Orange Intranet.

4.3.3.2.2 S2-2 – Processes for engaging with value chain workers about impacts

Orange has not defined a specific process for engaging with workers in the value chain. However, in 2025, Orange launched an "Orange value chain: is sustainable value creation possible?" dialogue at the Group level to begin discussions on this topic in 2026.

4.3.3.2.3 S2-3 – Processes to remediate negative impacts and channels for value chain workers to raise concerns

The *Hello Ethics* system described in Section 4.4.2.4 *Group whistleblowing system* is for all its stakeholders, including workers in the value chain. They thus have the opportunity to express their concerns and to trace the shortcomings of which they are victims or witnesses.

The visibility of *Hello Ethics* is ensured by its promotion on the Orange Supplier website, and by a mention in the supplier code of conduct. Despite this, Orange is currently unable to confirm that all workers in the value chain have knowledge of *Hello Ethics* and trust it to raise their concerns.

In addition to *Hello Ethics*, Orange and other members of the JAC are organizing surveys (Mobile Worker Survey) to gather the views of workers at sites that are particularly exposed to CSR risks in order to determine the need to conduct an audit if the site has never been audited before or to verify the implementation of corrective measures if the site has already been audited.

A QR code distributed through a poster displayed on the premises of the sites in question allows the supplier's employees to be informed of this whistleblowing system and to anonymously answer a survey related to working conditions, health and safety.

In 2025, as part of the JAC, Orange conducted five surveys of workers at mobile phone production sites. The surveys generally provide an overall picture of the situation, especially when the response rate reaches at least 30%.

Over the past two years, the problems most frequently raised by workers have been excessive working hours, young worker labor, health and safety, wages and pay. Reports on the surveys are provided to plant managers, so they can take this information into account to improve the workers' conditions.

In addition, Orange is setting up a dialogue with the UNI global union international trade union federation (see Section 4.3.1.3 *Human rights for workers in the value chain*), making it possible to learn about and participate in a remediation process with the representatives of the participating workers in the value chain.

Orange assesses the effectiveness and efficacy of its action plans to prevent or mitigate the negative impacts identified through its Vigilance Plan (Section 2.3 *Vigilance Plan*). However, Orange has not yet defined a Group process to assess the effectiveness of remediation measures in the event of a contribution to an actual negative impact.

4.3.3.2.4 S2-4 – Taking action on material impacts on value chain workers, and effectiveness of those actions

In line with the objectives of the Group's sourcing and human rights policies and Orange's commitments to responsible procurement Orange is taking action to address the negative impact identified for workers in the value chain. The action plans to improve the working conditions of workers in the value chain are organized around three main ambitions:

- explaining what Orange expects of suppliers in terms of respect for their workers and workers in their value chain; ascertaining that these expectations are incorporated by both Orange suppliers and Orange buyers;
- monitoring and enforcing these expectations in terms of worker protection at Orange suppliers and in their value chain, through assessments and audits;
- improving knowledge of the issues and impacts associated with workers in the value chain through continuous dialogue with specialized organizations and supporting suppliers in their own consideration of these issues.

A large proportion of the actions associated with these goals also allow for action on environmental issues, and are described in Section 4.2.2.2.2.2 *Supplier engagement: decarbonizing the value chain by selecting and working in partnership with suppliers*.

Orange has not formalized a Group process allowing it to identify actions in this area, does not have a systematic process for identifying the resources associated with each action and discloses this information in part.

4.3.3.2.4.1 Ensuring that Orange's expectations in terms of respect for human rights in the value chain are taken into account: supplier code of conduct and CSR clause

With the automatic inclusion of the CSR clause referring to the Supplier code of conduct and to Orange's commitments to responsible procurement in all its purchasing contracts, Orange requires its partner stakeholders, suppliers and their own subcontractors in all regions as soon as the contract is signed and throughout its period of validity:

- to comply with all national, European and international regulations governing ethical and responsible behavior. This includes, but is not limited to, standards dealing with human rights, occupational health and safety, environmental protection, sustainable development, the fight against corruption and child protection;

- to adopt and apply the Group's ethical standards and commitments, and make progress in these areas.

The inclusion of this CSR clause in contracts is the subject of a specific metric (see Section 4.3.3.2.5 *S2-5 – Targets related to managing the material negative impact*).

The Orange supplier code of conduct⁽⁴¹⁾ describes the ethical, social and environmental commitments expected by the Group. A new version of the document took effect in 2025 to strengthen conflict of interest obligations with regard to suppliers and subcontractors.

Orange specific environmental requirements are described in Section 4.2.2.2.2.2 *Supplier engagement: decarbonizing the value chain by selecting and working in partnership with suppliers*.

Those that are specific to human rights and working conditions are as follows.

Child labor	The supplier is prohibited from employing persons under the age of 15 or the age of completion of mandatory education, or under the legal working age in the country, whichever is higher. It must take all measures to enforce this ban in its <i>supply chain</i> . If it is discovered that a child is working on the supplier's premises or that of one of its subcontractors, the supplier must immediately take steps to remedy the situation in order to serve the best interests of the child.
Non-discrimination and diversity	The supplier must treat all employees with respect and must not inflict corporal punishment, use physical or moral coercion or engage in any form of abuse, harassment or threats. The supplier must combat all forms of discrimination in relation to ethnic origin, skin color, gender, sexual orientation, language, disability, religion, political or other opinion, national or social origin, or age. It must ensure compliance with gender equality in the workplace, and promote diversity, equal opportunities and equal treatment in employment and the workplace.
Non-use of slavery and forced labor	The supplier must comply with the United Nations Universal Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work and all applicable regulations prohibiting slavery, including modern slavery, human trafficking and all forms of forced or compulsory labor within the meaning of the ILO Forced Labor Convention. All work must be voluntary and workers must be free to leave or terminate their employment with reasonable notice. Suppliers must not retain, destroy, conceal, or confiscate access to their employees' identification and immigration documents, such as work permits, unless required by law. In addition, suppliers must work to eliminate the risk of modern slavery in their own supply chains.
Pay	Suppliers must provide compensation in line with national regulations on minimum wages. In the absence of national regulations, pay must be sufficient to cover basic needs such as housing, food and health, and meet the standards of ILO convention C131 on minimum wage fixing. The basis on which workers are paid must be clearly communicated to them. Suppliers must not resort to salary deductions as a disciplinary measure.
Working time	Working time, including overtime, must comply with applicable local laws. In the absence of national legislation, ILO standards must apply. Suppliers must ensure that all workers are entitled to paid leave.
Health and safety	Suppliers must provide their workers with a working environment that protects their health and safety, particularly in terms of fire protection and the cleanliness of the premises. The supplier must take the necessary measures to prevent occupational accidents and illnesses. They must regularly hold appropriate training sessions to ensure that workers have sufficient occupational health and safety knowledge. This includes the provision of appropriate personal and collective protective equipment and instructions on their use. When providing accommodation, suppliers must ensure that it is clean and safe, and that it meets the basic needs of workers and, where applicable, their families. Suppliers are encouraged to implement an occupational health and safety management system (OHSMS), based on international standards such as ISO 45001 or equivalent.

(41) https://fournisseurs.orange.com/wp-content/uploads/coc_en.pdf

4.3.3.2.4.2 Assessing and auditing suppliers on topics relating to respect for the human rights of workers

Implementing CSR criteria in Orange's supplier selection

In order to improve the consideration of CSR performance in its supplier selection process, Orange incorporates CSR criteria in up to 20% of the score given to suppliers in purchasing decisions for purchasing projects in certain areas (IT and networks, fixed customer equipment, etc.) for amounts exceeding 1 million euros. This action plan is a process of continuous improvement and has no defined time horizon.

Half of the CSR score is an assessment of the supplier's overall CSR maturity and the other half is composed of environmental criteria specific to the product purchased by Orange, depending on the above-mentioned areas.

The weighting of CSR in the decision criteria for all purchasing projects in France led by the Group Procurement Department was increased in 2023 and now follows the following rules:

- 20% for projects with a high/very high CSR risk and/or a significant carbon impact;
- for purchasing projects with a CSR risk that is not high, the recommendation is to devote 10% of the score awarded to suppliers to CSR, to be decided in consultation with the advising departments.

In addition, depending on the human rights issues and risks, specific requirements may be included in the specifications attached to requests for proposals.

Assessing the CSR maturity of Orange suppliers

An assessment of suppliers' CSR maturity must be carried out before entering into a contractual relationship for purchasing projects involving high and very high CSR risk categories (subject to the application of an estimated expenditure threshold). The "list of CSR risk purchasing categories" is defined by the Group duty of vigilance manager and GPS, taking into account the impact on health-safety, human rights and the environment, the probability of occurrence of risks, and the specific characteristics of the geographical regions of the Orange entities making the purchase.

This list has been shared with all players involved in assessing suppliers' CSR maturity. In order to guarantee the independence and quality of the analysis, supplier assessments were entrusted to a partner undertaking, whose methodology is based on international CSR standards and guidelines such as the United Nations Global Compact, ISO 26000, ILO or the Global Reporting Initiative (GRI).

Supplier CSR maturity assessments include questions in relation to respect for the health, safety and working conditions of their employees and those of their suppliers. When analyzing the results, Orange's teams pay particular attention to these two dimensions.

Orange's activities are global in scope. In order to adapt to the specific local characteristics of the Group's entities, the CSR analysis may be based on an internal assessment by Orange in the form of a questionnaire.

This assessment process and the objectives pursued are mandatory.

Managing using the Vigilance Plan

The duty of vigilance liaison officer in the Group Procurement Department is tasked with implementing the Vigilance Plan, with a local version of the risk mapping of the duty of vigilance, focusing their impact analysis on the assessment of the existence and relevance of mitigation policies to address these risks, as well as raising awareness of the Vigilance Plan among buyers (see Section 2.3 *Vigilance Plan*).

This officer also makes proposals to improve the management, assessment and monitoring of the Vigilance Plan within GPS. This action plan is a process of continuous improvement and has no defined time horizon.

Auditing and ensuring supplier compliance

The action plan for auditing working conditions and respect for workers implemented by Orange in its *supply chain* is based on several systems. These systems are continuous improvement processes and do not have a defined time horizon.

Audits by the Joint Alliance for CSR (JAC)

Orange helps verify compliance with CSR standards through the JAC, an association of telecommunication operators (31 members as of the end of 2025, representing more than half of industry revenues worldwide). The JAC is a research platform for ecosystem solutions that responds to sustainability challenges affecting the entire *supply chain*, such as climate change, the implementation of circular economy principles and the fight against new forms of human rights violations and labor exploitation. In this respect, the JAC has established dedicated working groups in order to adopt common positions and a shared methodological approach aiming to anticipate, monitor and measure the implementation of these principles in order to respond more effectively to the new duty of vigilance regulations.

One of the JAC's missions is to audit, assess and develop the implementation of CSR standards in the production chain by the ICT industry's global suppliers. It has pooled the results of production site audits carried out by its various members since 2010. These production sites, including those of Orange's suppliers, considered to be a high CSR risk, are located in several regions of the world and at different levels of the *supply chain* (tiers 1, 2 and 3).

Worker protection issues are particularly important in the context of JAC audits. The 146 questions from the JAC's audit program are grouped around ten CSR topics, including those related to workers in the value chain with child and young worker labor, forced labor, health and safety, freedom of association, discrimination, disciplinary practices, working hours, wages and allowances, the environment and business ethics. Compliance with the CSR standard (SA 8000 and ISO 14001) is verified by an external audit firm specializing in CSR. Within the JAC's on-site audit campaign, some audits are conducted under the Responsible Business Alliance (RBA) initiative: the Validated Assessment Program (VAP) audits. JAC recognizes the equivalence of these audits to JAC audits.

The results of these audits are taken into account in managing the suppliers with which Orange has entered into contracts. This information is retained and included in the file by the requisitioners and buyers who requested these audits for any renewal or new contract with these same suppliers, if applicable.

Following an audit, and in the event of non-compliance, a corrective action plan is proposed by the auditor with a specific resolution time. These corrective action plans are monitored and managed by the JAC to ensure that suppliers take corrective actions into account.

Nature of the audits carried out over the entire 2025 JAC campaign	2025
On-site JAC audits	127
On-site VAP audits	24
Mobile Worker Survey	15 ⁽¹⁾
Total audits recognized by the JAC (on-site JAC audits, on-site VAP audits, Mobile Worker Survey)	166 ⁽²⁾
Nature of the audits carried out on supplier sites shared by Orange	
On-site JAC audits	81
On-site VAP audits	23
Mobile Worker Survey	13 ⁽³⁾
Total audits recognized by the JAC (on-site JAC audits, on-site VAP audits, Mobile Worker Survey)	117
Nature of the audits conducted by Orange directly	
On-site JAC audits	10
On-site VAP audits	0
Mobile Worker Survey	5
Total audits recognized by the JAC (on-site JAC audits, on-site VAP audits, Mobile Worker Survey)	15

(1) Corresponding to 12,552 employees surveyed.

(2) 60% of Tier 2, 3 and 4 suppliers covered by these on-site audits and the Mobile Worker Survey in total.

(3) Corresponding to 12,205 employees surveyed.

The JAC's actions in 2025 led to the creation of a total of 794 corrective action plans, detailed in the following tables:

	2025	
	All 127 JAC on-site audits	o/w 81 supplier sites shared by Orange
Indicators in the field of human rights		
Modern slavery or human trafficking	25	13
Non-decent working conditions (adequate wage + excessive working time)	173	110
Child labor	22	14
Infringement of the freedom of association and right to collective bargaining	6	3
Occupational health and safety	392	228
Discrimination	3	3
Indicators in the field of the environment	92	39
Other indicators		
Business ethics	80	21
Disciplinary measures	1	1

The results of the 127 JAC audits performed on-site in 2025 are detailed in the following table:

Score category	2025	
	All 127 JAC on-site audits	o/w 81 supplier sites shared by Orange
Excellent	27%	32%
Good (with room for improvement)	47%	44%
Conditionally accepted	3%	3%
Poor	23%	21%

Customer service provider audits

Services related to Orange's customer services are subject to special monitoring. Customer services are mainly concerned with providing support to Orange customers when they express a need, by telephone, chat or messaging. They are mostly outsourced and, to manage its partners and ascertain the working conditions at its service providers, Orange organizes annual reviews with the management teams of the five main customer relations partners, with the participation of its customer services directors. These reviews provide an opportunity to analyze partner performance (performance indicators, country satisfaction surveys, etc.), share strategic visions, take stock of actions, and share best practices.

These partners have been selected as part of calls for tender, in part on the basis of quality of life and working conditions for their employees. The framework agreements entered into Orange's CSR clause, which sets out the Group's respect for human rights requirements. Business reviews are followed up on throughout the year by the operating departments, whose project managers regularly visit sites to carry out operational monitoring of quality, processes, etc., and have many opportunities to interact with the teams. The Group entity responsible for the customer experience (CXO) also conducts on-site audits of partners, focusing on the management of all their processes and operating methods (recruitment, training, skills development, quality monitoring, etc.). Deviations from Orange's requirements are the subject of corrective improvement plans and monitoring. In addition to the *Hello Ethics* whistleblowing system (see Section 4.4.2.4 *Group whistleblowing system*), these major partners have also implemented anonymous reporting procedures.

Enhanced safety audits for Orange suppliers in France

In France, Orange has a specific action plan for two types of subcontracting activities, identified as being particularly risky for workers of Orange subcontractors and their own subcontractors; these are subject to systematic and organized monitoring.

Network installations

The work required to set up telecom infrastructure, particularly with regard to fiber and its roll-out throughout the territory, is mainly carried out by service providers external to Orange. This work is particularly sensitive and risky for the safety of the workers performing it. A dedicated team within Orange's technical department is responsible for monitoring this activity, which includes a second party audit process (audit of external service providers). The purpose of these audits is to ensure the ability of all suppliers to meet Orange's commitments to its customers:

- by verifying that their quality, safety and environment (QSE) management system makes it possible to meet the contractually agreed requirements;
- by identifying support points, and for deviations identified in the audits, a request for systematic implementation of curative and corrective actions in order to comply with Orange's guiding principles.

This supplier auditing process was co-built with suppliers. The assessment of their processes and their QSE management system takes the form of a labeled maturity score. The OHSMS and Environmental Management System (EMS) standards are included in the assessment grids of these audits. Building on the results of the approach undertaken in 2023, during 2024 the supplier audit program continued to include suppliers' major subcontractors, in order to have an end-to-end view of the implementation of Orange's requirements and, in particular, in 2025, it incorporated

the IT security requirements (cybersecurity, GDPR) relating to the information security management system (ISMS).

Supplier audits are carried out by Orange internal resources, authorized auditors who have completed the Orange training curriculum. This audit process (method and professionalization of auditors) was validated by a reputable certification body (Afnor Compétences) and audited in 2023 by Orange's Group Audit, Control and Risk Management Department (DACRG), which consolidates this audit framework.

In addition to supplier audits, a strategy of unannounced checks has reinforced this monitoring system. The aim is that they will make up a minimum of 10% of the QHSE controls on the ground carried out by Orange. These checks are used to ensure on the ground that technicians comply with the on-site work safety rules defined by the labor code and in the contractually established safety plan. These checks apply equally to the supplier's technicians and those of their subcontractors (rank 2). Action plans are requested in the event of recurrent non-compliance and are monitored periodically during QSE reviews with these suppliers.

Real estate work

Orange's real estate in France has a special team that carries out safety audits on sites where work is carried out by subcontractors. This team ensures the regulatory compliance of Group service providers, in order to ensure secure business conditions and safe and healthy working environments. For each of its service providers, the department establishes safety plans or a health and safety organization, in accordance with the regulations. This enables it to address the risks of co-activity and the risks intrinsic to the building. Safe and healthy working environments entail:

- controlling asbestos-related risks and monitoring materials that contain asbestos, through periodic assessment campaigns and the treatment of degraded materials, affected by works or by a hazard;
- controlling risks related to lead in buildings by treating materials affected by works or by a hazard;
- controlling radon risks through a radon zone declaration or a measurement and corrective action campaign on potentially affected occupied areas;
- ensuring the safety of roofs and terraces larger than 200 m² by means of audits, precautionary measures and refurbishment work in case of non-compliance.

It provides training and awareness programs to its employees in charge of managing subcontracting on the safety topics of service providers, in order to ensure their skill level.

Lastly, Orange's real estate team in France ensures that regulatory compliance is respected at all of its sites where its subcontractors operate. To do this, it relies on a compliance monitoring tool, and action plans specific to each entity that bears responsibility for regulatory compliance on three topics: operation, safety and construction.

4.3.3.2.4.3 Improving knowledge and supporting suppliers on human rights

In 2024, Orange's Responsible Procurement Committee commissioned a working group composed of members of the Group's CSR and Procurement departments, in order to develop substantive actions to improve knowledge of the challenges and impacts associated with *supply chain* workers and to better support suppliers in their own consideration of these issues.

Specific actions for telecom equipment suppliers

Telecom equipment suppliers are characterized by the depth of their *supply chain*, which makes it complex all the risks to which workers are exposed. Orange is working on the following areas:

- the partnership with the JAC makes it possible for telecom operators facing the same CSR issues to pool their resources. In 2025, Orange's participation in JAC's due diligence working groups will make it easier to identify and assess CSR risks in the *supply chain* by mapping suppliers based on their compliance commitment and production sites. It will also help increase supplier engagement, through targeted development programs (training sessions, working groups, and webinars);
- Orange is one of the eight JAC operators that support a program by the NGO Save the Children aimed at creating a lasting impact for children in mining communities and addressing child labor in artisanal cobalt mines in the Kolwezi region in the Democratic Republic of the Congo;
- since 2017, Orange has been a member of the ILO Child Labor Platform, an initiative bringing together companies and public actors working to eradicate child labor in supply chains. One of the coalition's working groups focuses in particular on the development of a census platform for children present in artisanal mines in the Democratic Republic of the Congo and aims to ensure the monitoring of these children and their possible return to schooling or access to training.

Studying the assessment of the social impact of products and social life cycle analysis (LCA)

As with environmental topics, understanding Orange's impacts on workers in its value chain, and stakeholders more broadly, requires a cross-cutting and targeted view by sourced product and service. The social life cycle analysis, like the environmental LCA, is used to measure the social and societal footprint of the products necessary for the development of the Group's business. The trial launched in 2024 continued in 2025 with discussions on the boxes.

Supplier Forum

The Supplier Forum brings together many Orange partners every year. One of its objectives is to raise awareness among the latter of various topics and in particular of CSR. The 10th edition of the Supplier Forum took place in June 2025 and gave the Group's Executive Director of Social and Environmental Responsibility an opportunity to speak and to present, to more than 500 strategic and critical suppliers, her vision of the objectives to be achieved and the concrete CSR actions to be taken. Notable cooperation projects undertaken by Orange were shared, including Orange's cooperation with its peers through the JAC, which is actively engaged in work related to respect for human rights.

Supporting supplier upskilling

The issues relating to purchases linked to Orange's activities within the Africa and Middle East zone are the subject of particular attention because these purchases are mainly indirect purchases, among which categories of purchases are at significant risk in terms of health, safety and working conditions, as well as in terms of adequate wages: network and construction work, security and maintenance. In 2024, Orange organized several training and awareness sessions for its employees, particularly buyers, as well as for its high-risk suppliers. A human rights awareness session was organized with the United Nations Global Compact involving local Orange suppliers considered to be high risk. In addition, a module dedicated to human rights issues in the *supply chain* has been integrated into the "Leader of Sustainable Change in Africa &

the Middle East" training program aimed at CSR managers from 17 countries in the Africa & Middle East region. In 2026, Orange plans to continue to take greater account of social dimensions in its specific CSR training for buyers in the Africa & Middle East region and also to continue to raise suppliers' awareness, mainly at local supplier forums.

In addition, Orange expects its service providers to ensure the safety and training of their own employees, for example, when working at antenna sites. Orange does not conduct systematic audits of these systems, but does ensure, through the contractual framework and supplier dialogue, that its partners apply practices that comply with the Group's health and safety policy and with local regulations.

CSR training for buyers

Orange ensures that buyers are acculturated to CSR through various training programs. In France, the "CSR and Responsible Purchasing" training was updated in 2025 and was the subject of two sessions in 2025. These components supplemented existing training courses: "Finance & performance, a committed CSR player" and "Learning the essentials of responsible purchasing at Orange."

4.3.3.2.4.4 Promoting inclusive and responsible purchasing

Responsible Purchasing label

The "Supplier Relations and Responsible Purchasing" label was renewed in 2025 for Orange France. This label is issued by the French Ministry of Economy and Finance, Business Mediation and the National Purchasing Council. The label is awarded for three years, subject to successful completion of the annual interim assessments. In 2025, the Group Procurement Department also underwent an ISO 20400 maturity assessment and was awarded the "significant" level (third level out of four). That label is a vehicle for progress and performance, aimed at developing lasting, trust-based, balanced relationships between customers and suppliers. It is fully aligned with the Group's major responsible purchasing challenges.

More specifically, through the 15 criteria under the Plan, Do, Check, Act (PDCA) method, it covers:

- responsible purchasing commitments and their alignment with Group policy and strategy;
- responsible sourcing in these processes and practices;
- the vocational training of buyers;
- supplier relations (compliance with contractual law and balance, mediation, supplier reviews, etc.).

Responsible sourcing encompasses several dimensions, including: fairness of the purchasing process; CSR specifications and performance in all aspects of respect for human rights and the environment; the circular economy; and inclusive purchasing. It aims to control financial and compliance risks, as well as CSR issues, including economic dependence and respect for financial equity. This entails:

- compliance with payment deadlines in accordance with French law 2008-776 of August 4, 2008 on the modernization of the economy;
- advance supplier payment for SMEs/VSEs – formerly known as collaborative reverse factoring – which consists of a responsible short-term financing program set up by the ordering party (buyer) to support its suppliers' cash flow, making it possible to pay their invoices in advance through a factoring company in exchange for favorable financing costs;

- specific payment periods reduced to 30 days for companies labelled as innovative start-ups or SMEs;
- taking the region into account when it comes to local suppliers;
- the use of mediation to resolve any disputes.

Inclusive purchasing in France

In 2025, Orange purchased 20.8 million euros of services from just under 300 suppliers in the protected and adapted labor sector (PALS)⁽⁴²⁾. This brings the cumulative total of purchases made with these players since 2021 to 98 million euros. The “inclusive potential” of tenders is analyzed as soon as the Group Procurement Department’s annual roadmap is drawn up. A selection of suppliers regularly makes presentations to targeted buyers and requisitioners. In 2025, Orange carried out an assessment process on purchases made with suppliers from the social and solidarity economy (SSE) in France, in order to understand the volumes and expand the process to the Group’s countries. These purchases consist of inclusive purchases (entities identified as working in the field of integration through economic activity (IEA) and in PALS) as well as all SSE players, such as associations, cooperatives, mutual societies, foundations and business enterprises in the SSE. This approach has made it possible to value all the services ordered by Orange in France from players whose main purpose is a proven social and environmental impact. In 2025, an initial estimate of Orange’s purchases in France from the SSE sector, according to the INSEE classification, put them at around 84 million euros (see Section 4.3.5.1.5.2 *Supporting entrepreneurship*).

Implementation of a due diligence plan for non-use of minerals from conflict areas

Orange recognizes the legitimacy of concerns about sourcing materials from regions plagued by political and social conflicts, and is striving to use a socially responsible *supply chain*. However, the *supply chain* for these minerals is long and complex and involves many stakeholders. Orange does not purchase minerals directly, and requires its main suppliers to perform due diligence to avoid using minerals that may directly or indirectly finance armed groups.

Orange does not regard mineral supplies as part of its value chain; however, the Group encourages its suppliers to ensure that they themselves do not use minerals from conflict areas through three different levers, namely: the supplier code of conduct, which is appended to all purchasing contracts; the equipment-specific CSR annex, which is more restrictive and is appended to all equipment purchasing contracts; and lastly, the CSR clause appearing in purchasing contracts, which involves suppliers signing “Orange’s Commitments to responsible procurement.”

Supplier assessments by a partner company consider the issue of non-use of minerals from conflict areas. The same applies to the on-site audits carried out by the JAC, which have a checkpoint on the procedures implemented to prevent the use of minerals from conflict areas. Non-compliance on this point triggers corrective actions and their follow-up.

4.3.3.2.5 S2-5 – Targets related to managing the material negative impact

Orange has not set a target associated with the negative impact for workers in the value chain. Orange measures the effectiveness of its action plans using the metric monitoring the introduction of the CSR clause in new contracts (or contract renewals). This metric corresponds to the percentage of new contracts including a CSR clause signed during the year, compared to the total number of contracts signed during the same period.

This metric is calculated from the data reported by the Group entities in an annual report.

	2025	2024	2023
% of contracts signed including the CSR clause	87% ⁽¹⁾	90% ⁽²⁾	95% ⁽³⁾

(1) Data collected for a scope representing 96% of 2025 consolidated revenues of Orange and BuyIn.

(2) Data collected for a scope representing more than 82% of 2024 revenues of the Group and BuyIn.

(3) Data collected for a scope representing more than 94% of 2023 revenues of the Group, BuyIn and Orange Bank.

4.3.4 ESRS S3 – Affected communities

Matter for Orange	Impacts, Risks, Opportunities	Policies	Main action plans
Digital inclusion and equality	Operational risk relating to the roll-out or integrity of networks due to lack of acceptability for local residents	Radio waves and health policy Human rights policy	– Simulate wave exposure – Consult with local authorities – Inform the public – Promote research and responsible innovation

4.3.4.1 ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

In its double-materiality analysis, Orange identified an operational risk relating to the roll-out or integrity of the networks due to failure to gain acceptance from local residents, defined as the people

living near antenna sites and constituting a community affected by Orange’s activities.

Although scientific studies have not established a link between exposure to electromagnetic radio waves at regulatory levels and health effects, people living near antenna sites may have questions about the impact of radio waves on their health or consider that antenna installations may contribute to causing a visual nuisance.

(42) PALS (protected and adapted labor sector) refers to a group of institutions and services dedicated to the employment of people with disabilities. This sector mainly includes adapted companies (where at least 55% of employees are people with disabilities) and French organizations that help people with disabilities enter the workforce (*établissements et services d’aide par le travail* – ESATs).

4.3.4.2 Management of the IRO related to affected communities

4.3.4.2.1 S3-1 – Policies related to affected communities

The management framework for the operational risk relating to the roll-out or integrity of the networks due to failure to gain acceptance from local residents is based on two policies: the radio waves and health policy and the Group human rights policy.

4.3.4.2.1.1 Radio waves and health policy

Mobile telephony network technologies and roll-outs are evolving to meet the ever-increasing use of mobile devices, which could potentially increase exposure to radio electromagnetic waves, whether for the general population (via new fixed transmitters) or for users (through the use of new mobile equipment or by adopting new behaviors). This increased exposure to electromagnetic radio waves may stoke health fears among people living near antenna sites.

In this context, and when installing and operating its electronic communication networks, Orange acts in accordance with a strict legal and regulatory framework. In line with its radio waves and health policy, the company follows recognized best practices for its sector in order to guarantee a safe, responsible and effective roll-out of new technologies.

In 2025, in the face of changing digital uses, the massive roll-out of 5G and the preparations for future generations of very high-speed broadband networks, as well as society's rising expectations in terms of health, environment and stakeholder dialogue, Orange updated the Group's five principles for radio waves and health from 2007. This new version retains the founding commitments of 2007 while expanding on them and adapting them to contemporary challenges.

The principles of the new 2025 policy are as follows:

- Orange rolls out and operates its mobile infrastructure in a responsible manner: strict compliance with local regulations on exposure to radio waves, regular monitoring of exposure levels generated by its networks and special attention paid to the installation of antennas near sensitive institutions;
- Orange provides clear and transparent information on radio waves: specific absorption rate (SAR) posted for mobile phones sold in stores and online; access to information, expert opinions and advice on reducing exposure to radio waves on [orange.com](https://www.orange.com)⁽⁴³⁾; and scientific mediation and workshops via the permanent exhibits at the Cité des Télécoms⁽⁴⁴⁾ in France;
- Orange engages in dialogue with its stakeholders: it organizes discussions with local authorities and/or residents before installing antennas, addresses concerns raised by communities and participates in dialogue committees and consultations organized by European and national authorities;
- Orange protects its employees and service providers: it applies safety rules for employees working on antenna sites and integrates safety requirements into clauses in purchase agreements requiring that suppliers guarantee the health and safety of their own workers;
- Orange implements a responsible research and innovation approach: it provides financial support and technical expertise

to academic research projects on radio frequencies; contributes to international (IEC), European and national standardization work on exposure measurement methods; and provides technical or anonymized data on the use of mobile networks to support independent research on health and biodiversity;

- Orange takes a responsible marketing and communication approach: it does not market mobile devices specifically designed for very young children and does not target very young children in its mobile offer promotions.

This policy is aligned with internationally recognized standards applicable to communities, including the UN Guiding Principles on Business and Human Rights.

It applies to all subsidiaries and regions of the Group, as well as to all stakeholders, including subcontractors and entities that collaborate on infrastructure roll-out and maintenance.

Its implementation is overseen at the Group level by the Radio Waves and Health Committee. This committee, headed by the Group CSR Department, oversees the implementation of the policy at the Group level. It defines the guidelines, tracks application of the policy, ensures continuous scientific and regulatory monitoring and prepares vigilance notes. This committee brings together an attorney, a public affairs expert, a technical expert, two CSR experts (Group and France) and representatives from the Africa & Middle East and Europe regions.

The radio waves and health policy is available on the Orange website⁽⁴⁵⁾.

4.3.4.2.1.2 Group human rights policy

As part of its human rights policy discussed in Section 4.3.1.1 *Human rights group policy*, Orange describes its human rights commitments for all its stakeholders. The policy confirms Orange's focus on the health of local communities, such as local residents and the populations affected by the installation of antennas.

4.3.4.2.2 S3-3 – Processes to remediate negative impacts and channels for affected communities to raise concerns

To ensure respect for the rights of people living near antenna sites, respond to questions, anticipate concerns and build a climate of trust around its projects, Orange is working with its stakeholders to promote a better understanding of the impact of the antennas and ensure a smooth roll-out of its infrastructure.

Orange relies on local communication to make residents aware of the channels they can use to raise concerns and it believes, based on their active participation, that awareness is high.

However, Orange has not adopted a formal policy governing the protection and confidentiality of the feedback from local residents who use these dialogue channels.

In France, the various channels for people living near antenna sites to express their concerns and allow Orange to follow up and take their concerns into account, are:

- discussions with elected officials: rolling out antennas involves interacting with elected officials and local residents, often through the mayor. The latter plays a key role in gathering feedback from residents on antenna installations. A new tool rolled out in 2025 in France facilitates the monitoring of this feedback by project managers;

(43) The Orange group's radio waves website <https://www.orange.com/en/whats-up/impact-radio-waves-lowdown>

(44) The Cité des Télécoms in Pleumeur-Bodou <https://www.cite-telecoms.com/en/>

(45) <https://gallery.orange.com/element?id=510198>

- participation in focus groups: Orange participates in focus groups with local authorities to answer any questions or requests (see Section 4.3.4.2.3.2 *Consulting with local authorities*);
- face-to-face discussions with local residents: Orange engages directly with residents mainly through meetings organized by the local authorities at their request. Residents can also approach Orange directly;
- participation in national dialogue committees, supported by the French Government Agency that manages the country's radio spectrum (*Agence nationale des fréquences – ANFr*) and the French agency for health and safety (*Agence Nationale de Sécurité Sanitaire*), which bring together operators, associations and citizens to discuss radio wave exposure and promote a constructive dialogue. The portals of these organizations also provide educational resources and regular updates on health issues related to wireless technologies.

4.3.4.2.3 S3-4 – Taking action to manage material risks concerning affected communities, and effectiveness of those actions

In line with its radio waves and health policy, Orange has implemented the following actions to mitigate the operational risk relating to the roll-out or integrity of the networks due to failure to gain acceptance from local residents. These actions constitute processes of continuous improvement and have no defined time horizons.

Orange does not have a systematic process for identifying the resources associated with each action and discloses this information in part.

4.3.4.2.3.1 Simulate wave exposure

Orange acts transparently with local residents by conducting simulations of exposure to radio waves, particularly when requested by mayors' offices in France. These simulations are used to verify that the antennas' emission levels comply with the thresholds established by law and by the ICNIRP recommendations, while also defining appropriate security perimeters. In both 2024 and 2025, more than 300 simulations were carried out in France, each confirming compliance with standards and reassuring the local authorities. When asked, the ANFr will also take action to check these exposure levels.

Orange contributes to the transparency of its activities by sharing its data and participating in the approval of educational maps of radio wave exposure levels published by the ANFr as part of the 4th National Health and Environment Plan (PNSE4). Since 2025, these maps have covered mainland France and the five overseas departments and regions. Accessible via Cartoradio and the ANFr's OpenBarres app, they enable citizens and local authorities to visualize the simulation of external exposure to radio waves emitted by mobile phone base stations.

In all countries where Orange is present, the ICNIRP recommendations have been taken into account as the population exposure thresholds that must be respected. In 2025, the GSMA confirmed that all countries where Orange is present take these exposure thresholds into account.

4.3.4.2.3.2 Consult with local authorities

Orange maintains a regular dialogue with local authorities to facilitate the roll-out of telecommunication antennas and meet local social expectations. Thus, while the principles of precaution, transparency and dialogue are common to the Group, the methods of implementation may differ depending on the national regulatory context.

In France, this dialogue can be illustrated by consultation agreements signed with certain cities, in order to supplement the legal framework and optimize network planning.

The discussions focus in particular on antenna installation and may also integrate esthetics into the urban environment. Orange is particularly vigilant when installing antennas near sensitive institutions (schools, hospitals).

To ensure transparency, comprehensive informational materials are sent to mayors' offices, including regulatory data and, where appropriate, exposure simulations.

This process of listening and adapting helps strengthen trust between Orange, local authorities and citizens, while ensuring compliance with safety standards.

4.3.4.2.3.3 Inform the public

Orange informs the general public about radio waves and health through its corporate websites (including orange.com), where health advisories, standards, regulations and the Group's commitments can all be found. The Group also provides practical advice on how to reduce exposure (hands-free kit, moderate use).

In France, Orange is setting up channels that local residents can use to express their concerns (see Section 4.3.4.2.2 *Processes to remediate negative impacts and channels for affected communities to raise concerns*).

Orange also contributes to sectoral initiatives led by operator organizations, to transparently share best practices for mobile network roll-outs, regulatory compliance and scientific monitoring of the effects of radio waves.

In France, the Cité des Télécoms supplements this system by offering educational content on radio waves and health for families and children.

4.3.4.2.3.4 Promote research and responsible innovation

Orange actively supports scientific research and international standardization on radio waves, notably through the following actions:

- participation in academic projects (e.g. Télécom Paris dosimetry chair, European Hexa X II project, sustain6G) aimed at combining technological performance, environmental impact and social acceptability;
- contributions to standardization groups (Specific Absorption Rate (SAR), power density, 5G/6G, IEC/IEEE, CE marking) to ensure a rigorous and harmonized scientific assessment;
- provision of anonymized data, which are useful for independent research on health and biodiversity;
- projects with peers in the International Electrotechnical Commission (IEC), International Telecommunication Union (ITU), the GSMA and the *Fédération Française des Télécoms* (France's Telecoms Federation – FFT), to define common practices and standards for wave exposure;
- support for research on biodiversity, in particular through its participation in and support for scientific conferences such as BioEM2025, focused on examining the potential effects of waves on living organisms.

These actions reflect Orange's commitment to developing its networks with an approach based on scientific rigor, transparency and social responsibility.

4.3.4.2.4 S3-5 – Targets related to managing material risk

Orange has not set a target associated with the operational risk relating to the roll-out or integrity of the networks due to failure to gain acceptance from local residents and does not disclose metrics on the effectiveness and efficacy of its action plans in its 2025 sustainability statement.

4.3.5 ESRS S4 – Consumers and end-users

Matters for Orange	Impacts, Risks, Opportunities	Policies	Main action plans
Digital inclusion and equality			
Digital inclusion and equality	Positive impact related to access to telecommunication services, promoting the socio-economic development of people and regions Opportunity as a locally based operator	Human rights policy	– Connect and equip – Inform, train and empower – Develop the socio-economic fabric – Offer inclusive services that complement connectivity – Support entrepreneurship
Digital trust			
Personal data protection and cybersecurity	Negative impact on end-users' privacy in the event of a breach of the security of personal data Reputational and financial risk in the event of a breach of the security of end-users' personal data	Group security policy Personal data protection policy Human rights policy	– Roll out the personal data protection program: continuous improvement plan for practices, AI/data projects and network APIs, expression of opinions to the public authorities – Roll out the cybersecurity program: manage data security, programs for the Group's critical and vital assets and for internal cyber rating, compliance with the NIS2 directive, audits and certifications – Raising awareness and training on personal data protection and cybersecurity
Health and well-being of users, including children	Negative impact on the health and well-being of children and young people of excessive screen use and exposure to inappropriate content	Policy on the rights and protection of children in the digital age Human rights policy	– Offer protection and control tools for parents and children – Raise awareness, inform and train children, parents, educators and employees – Contribute to the fight against online child abuse – Participate in sectoral initiatives and research bodies – Express opinions to public decision-makers
Continuity of service	Negative impact on users of a degradation of services or network disruptions due to a crisis, in the event of a conflict or at the request of a national authority Reputational risk or risk of loss of business related to degradations of service or network disruptions	Business continuity and crisis management policy Human rights policy	– Roll out the business continuity and crisis management policies – Better anticipate crises – Adapt to climate change – Respond to government injunctions
Responsible marketing and information practices	Reputational risk or risk of loss of customers in the event of a lack of transparency of offers and services	Responsible communication code Group principles regarding environmental claims Data and AI ethics charter Group customer experience strategy	– Design new offers – Increase the transparency of offers and information in the Africa & Middle East region – Increase the transparency of mobile offers abroad – Achieve a standard of operational excellence
Personal data protection and cybersecurity Health and well-being of users, including children	Opportunity as a trusted operator		– Develop new offers and services to meet the growing security and trust needs of digital life for BtoC customers – Develop new offers and services to meet the growing security and trust needs of digital life for BtoB customers

	Metrics	2025 progress	2025 targets	2030 targets
Digital inclusion and equality	Number of beneficiaries supported in the acquisition of digital skills since 2021 (cumulative, in million)	3.3	2.5	6
Digital trust	% of countries with a BtoB cybersecurity offer (countries where Orange is present as an operator)			100%
	% of countries with a BtoC cybersecurity offer (countries where Orange is present as an operator)			100%
	% of countries with a digital protection offer for children (countries where Orange is present as an operator)			100%

Orange's social strategy focuses on the three pillars of its sustainability strategy: mitigating its negative externalities, supporting customers and users and adapting its organization.

- Orange works to bridge the digital divide by providing access to digital services. The Group makes a positive contribution to the development and attractiveness of the regions by rolling out its broadband network and satellite offers to cover the most underserved areas. Orange also rolls out offers designed to promote energy inclusion and financial inclusion for those who are excluded. This is one factor in closing the social inequality gap. In addition, Orange offers social and solidarity solutions as well as affordable smartphones to accelerate the digital inclusion of as many people as possible. Finally, Orange is working to reduce disability-related inequalities in access;
- Orange works to support customers and users by strengthening autonomy and trust in uses. Orange is thus developing secure offers and protection offers for its BtoB and BtoC customers and offers tailored, resilient and sovereign solutions whether preemptively or to provide support when there is an acknowledged problem. In addition, Orange is committed to raising awareness and training the general public on the fully autonomous use of digital technology in the 26 countries where it operates. Orange advocates for the rights and protection of children in the digital age by supporting safer digital uses for

families with children. Finally, Orange supports the development of the local digital ecosystem and essential services through the entrepreneurs supported, its partnerships and its responsible purchasing strategy, as well as the development of employability, especially for women in tech and young people seeking to rejoin the workforce;

- Orange works to adapt its activity in response to human rights issues, both internally and externally. The Group complies with laws on modern slavery (the Modern Slavery Act⁽⁴⁶⁾), the law on the duty of vigilance and the international agreements on social rights signed with the global union (UNI). The Group's human rights policy takes the form of five key commitments described in Section 4.3.1.1 *Group human rights policy*. Orange believes digital technology can contribute to human rights and promotes the benefits of its activities due to the positive impact on its stakeholders. The Group communicates transparently and responsibly, and adapts its offers and practices to meet the needs of vulnerable people, communities in the regions and impact actors, particularly those from the social and solidarity economy.

To illustrate this strategic vision and make it easier to understand, the impacts, risks and opportunities related to consumers and end-users are organized in this chapter according to the two themes of digital inclusion and equality and digital trust.

Digital inclusion and equality

4.3.5.1 Management of IROs related to digital inclusion and equality

4.3.5.1.1 ESRS 2 SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model

In its double materiality analysis, Orange identified a positive impact related to access to telecommunication services, promoting local socio-economic development, support for local actors, social ties and professional integration, as well as an opportunity as a locally based operator that arises from its positive impact.

Orange has material impacts on all consumers and end-users of its products and services, but some of these benefit from specific programs:

- women: the gap in Internet use between men and women persists, especially in middle- and low-income countries where, at the end of 2024, there were 14% more women than men who did not use the mobile Internet⁽⁴⁷⁾. By using digital technology to

take targeted action to empower and integrate women into the workforce, they are positively impacted;

- children and young people: As such, Orange is helping young people from all backgrounds to find employment through digital technology. Digital technology is helping to promote equal opportunities in education by offering content and ways of learning by doing. It also offers access to training and specialization courses in high-demand sectors (Cloud, data, AI, cybersecurity). By 2030, sub-Saharan Africa could generate 230 million jobs requiring digital skills⁽⁴⁸⁾;
- people with disabilities, i.e. nearly one in five people worldwide according to the World Health Organization, use digital technology less than other people and benefit less from the opportunities it presents. According to a recent GSMA study, conducted in 14 countries, between 6% and 49% of people with disabilities used mobile Internet, compared with 35% to 85% of people without disabilities. People with disabilities also had less access to smartphones⁽⁴⁹⁾. Orange is continuing its efforts to adapt or create products and services that meet everyone's needs;

(46) Mainly the UK and Australian laws on modern slavery.

(47) <https://www.gsma.com/r/wp-content/uploads/2025/06/The-Mobile-Gender-Gap-Report-2025.pdf>

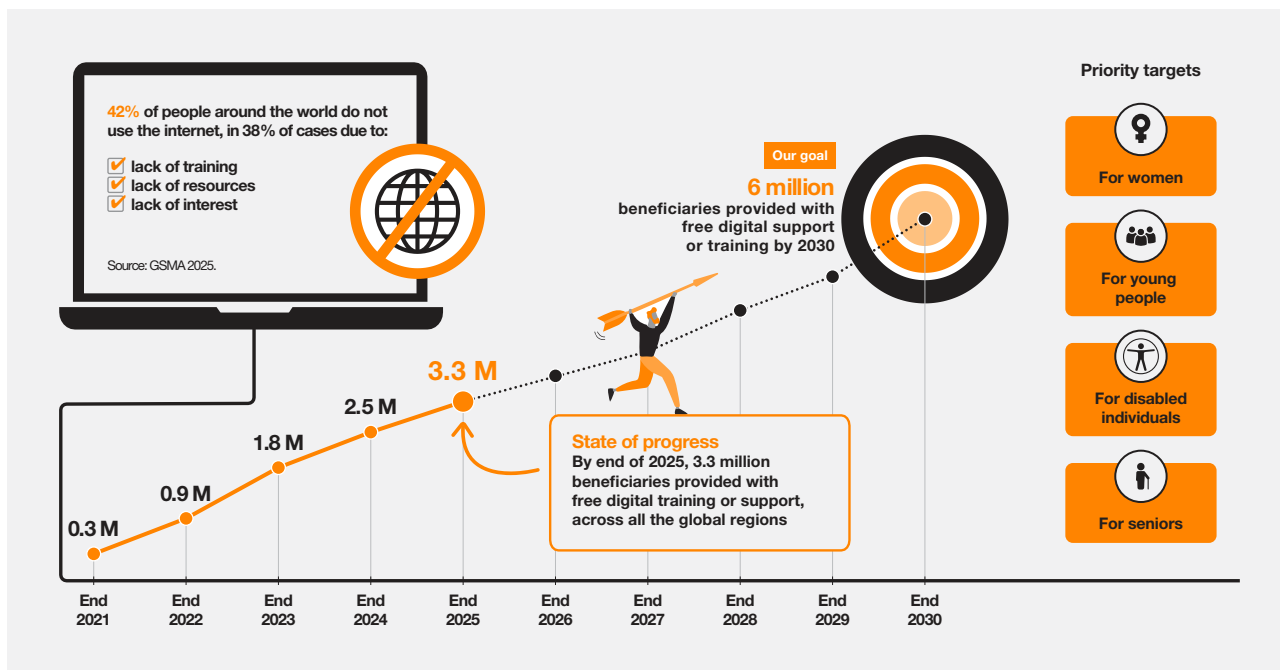
(48) Ousmane Diagana and Romuald Wadagni: Accelerating Africa's digital revolution to boost jobs and growth, World Bank, Blogs, November 17, 2025, <https://blogs.worldbank.org/en/voices/accelerating-africa-s-digital-revolution-to-boost-jobs-and-growth>.

(49) GSMA, The Mobile Disability Gap Report 2025: https://www.gsma.com/solutions-and-impact/connectivity-for-good/mobile-for-development/wp-content/uploads/2025/07/GSMA-The-Mobile-Disability_Gap_Report-2025.pdf.

- seniors: access to digital services increasingly affects the full exercise of their rights and well-being, in a context of increasing digitization of public services – administrative procedures, access to care, banking services. It is critical that they have the essential skills to access these services and to do so safely. For this reason, Orange is working to empower and raise awareness of online security and privacy for seniors, particularly in its European subsidiaries.

More generally, Orange's products, services and programs contribute to local socio-economic development by supporting local actors and local initiatives. Through its actions to roll out telecommunication infrastructure and its offer of products and services, Orange facilitates employment and skills development, entrepreneurship and the participation of all in economic and cultural life. Its status as a leading employer in many regions and its position as a client economic operator generate growth for local economies while also creating development opportunities for the Group.

Orange's commitment: provide free training to 6 million beneficiaries



4.3.5.1.2 S4-1 – Policies related to consumers and end-users linked to digital inclusion and equality

The Group's human rights policy includes a component on digital citizenship (see Section 4.3.1.1 *Group human rights policy*), which specifically addresses the positive impacts linked to inclusion, empowerment and equal opportunities.

Orange defends the idea of a digital technology that can be used for the social and economic development of all. In order for people to be responsible digital citizens, exercise their fundamental rights and develop in an increasingly digitized world where technologies are developing at an exponential pace, they must be given the means to act with awareness and confidence. This approach aims to develop the positive impact of people's access to telecommunication services.

4.3.5.1.3 S4-2 – Processes for engaging with consumers and end-users about impacts linked to digital inclusion and equality

Orange takes into account the views of its stakeholders, particularly consumers and end-users, on the matter of access by vulnerable populations to connectivity and the essential services of daily life, in particular through its stakeholder dialogue process (see Section 4.1.3.2.2.2 *Stakeholder dialogues*).

In France, in 2018 Orange carried out a stakeholder dialogue entitled "Precariousness and digital technology," which defined the need to provide social offers. In 2022, the stakeholder dialogue "Responsible together in a post-Covid digital world⁽⁵⁰⁾," launched in 11 countries, highlighted the importance of digital technology that is secure, environmentally responsible and able to play a major role in education, access to health, employment and local economic development. In 2024, the "ESG by Design" stakeholder dialogue played a critical role in informing the digital inclusion strategy. Finally, the "ESG by Design" dialogue conducted in eight countries in the Africa & Middle East division in 2025 highlighted digital inclusion and the local economy as major challenges in this region.

(50) Orange's CSR Media Library/Stakeholders: <https://gallery.orange.com/home>

4.3.5.1.4 S4-4 – Taking action on the material impact on consumers and end-users, and effectiveness of those actions linked to digital inclusion and equality

To structure its action plans on digital inclusion as a factor in equal opportunities, Orange relies on the Meaningful Connectivity⁽⁵¹⁾ framework created by the GSMA, which draws on United Nations initiatives, in particular those of the International Telecommunication Union (ITU) on universal and meaningful connectivity⁽⁵²⁾. This framework defines five connectivity enablers: infrastructure, affordability, access to devices, skills and, lastly, security and data protection.

Orange's actions in favor of infrastructure, affordability and access to devices are presented in Section 4.3.5.1.4.1 *Connecting and equipping* below. Skills, information and awareness programs are described in Section 4.3.5.1.4.2 *Informing, training and empowering*. Security and data protection are discussed in Section 4.3.5.2 *Management of IROs related to personal data protection and cybersecurity*.

Section 4.3.5.1.4.3 *Developing the socio-economic fabric* shows Orange's impact on local development, notably thanks to public-private partnerships, through its social impact assessment and research support actions.

Finally, actions allowing access to essential services through the use of mobile phones (financial inclusion, energy, healthcare), support for entrepreneurship and the social and solidarity economy are discussed in Section 4.3.5.1.5 *S4-4 – Taking action to pursue the opportunity related to digital inclusion and equality*.

Orange does not have a systematic process for identifying the resources associated with each action and discloses this information in part. The Orange Foundation discloses its annual sponsorship budget, a portion of which contributes to the objectives and actions described in the sections below. The annual sponsorship budget supported by the 24 Orange foundations totals 23 million euros, including 7 million euros for the Group Orange Foundation⁽⁵³⁾.

4.3.5.1.4.1 Connecting and equipping

Combating the digital divide by rolling out infrastructure

In its core business, Orange is investing in telecommunication infrastructure in order to expand its geographical digital coverage. The choice of investments is linked to the terms and conditions of the telecommunication licenses attributed to it and is intended to promote customer-friendly connectivity in terms of throughput and speed of roll-out. Improved connectivity boosts local economies and has a direct impact on the creation of national wealth, particularly visible in Global South countries.

Orange is the leader in the roll-out of fiber optics in Europe (see Section 1.2.3 *The Orange group strategy*). Its two European fiberco's in France and Poland are supporting the development of fiber in rural areas in Europe and the Group has adopted a targeted and responsible approach to rolling out 5G in Europe and in Africa & Middle East, focusing on busy areas with high connectivity needs and 4G networks nearing saturation. With its subsidiary TOTEM, Orange is strengthening its position as a manager and operator of passive mobile infrastructure.

In addition, in France and Belgium, customers living in remote areas can also now access very high-speed broadband using satellite technology. In 2025, Orange also partnered with Eutelsat in Africa & Middle East to accelerate the roll-out of satellite Internet, particularly in the most underserved regions. As part of this multi-year partnership, Orange is using the Eutelsat Konnect satellite, which offers state-of-the-art broadband technology, to provide reliable and accessible Internet access. Initially, deployment will involve Jordan, Côte d'Ivoire, Senegal and the Democratic Republic of the Congo, with the aim of gradually extending to all countries in the region⁽⁵⁴⁾.

Orange continues to connect the unconnected in the Africa & Middle East region by investing more than 1 billion euros a year to develop and modernize the mobile and fixed networks in order to roll out next-generation networks and expand coverage⁽⁵⁵⁾. Investments in the 2Africa submarine cable and the Djoliba network, which connects eight West African countries via 10,000 km of terrestrial fiber optic network and 10,000 km of submarine cable, aim to securely meet increased bandwidth needs and the needs of businesses and residents.

In areas and regions that are not connected to the electricity grid, Orange is innovating by rolling out solar-powered mobile network antennas. The Group is gradually establishing itself as a leader in the roll-out of solar panels in several Africa & Middle East countries, with over 14,000 mobile sites equipped, including in Liberia, Guinea, Sierra Leone and Madagascar.

Finally, Orange collaborates with public development banks to cost-effectively co-invest in the roll-out of fixed or mobile networks in areas with low population density. In November 2025, IFC and the West African Development Bank granted an 80-million-euro loan to Orange Mali to install 300 new 4G antennas and expand its fiber optic network to cover approximately 300,000 households and small businesses in the country. The investment also calls for Orange Mali to increase the proportion of women benefiting from its digital training programs to 70% by 2032.

Providing affordable offers and devices

Orange provides affordable offers and services to people in situations of financial vulnerability (precarious households or seniors, young people, refugees, etc.), with two separate programs: social offers and affordable mobile devices.

Since 2023, Orange has been offering a connectivity service suited to populations with little to no access to digital technology due to economic reasons, in each of the seven European countries where it operates. The social offers proposed allow, subject to eligibility but with more favorable pricing conditions than those of the market, access to the Internet with a stable and sufficiently dimensioned connection. This is the case for the "*coup de pouce Internet*" (Internet assist) offer in France, reserved for people with a family quotient less than or equal to 700 euros and for recipients of the solidarity benefit for the elderly (*Allocation de Solidarité aux Personnes Agées*)⁽⁵⁶⁾. This quality of connection facilitates online approaches and useful usage of digital technology: education, health, culture, online shopping, etc.

(51) <https://www.gsma.com/newsroom/>

(52) Universal and meaningful connectivity. <https://www.itu.int/itu-d/sites/projectumc/home/aboutumc/#/fr>

(53) The Orange Foundation strengthens its commitments to education, culture and autism: <https://newsroom.orange.com/la-fondation-Orange-renforce-ses-engagements-en-faveur-de-leducation-la-culture-et-lautisme/?lang=fra>

(54) Orange Africa and Middle East and Eutelsat announce a strategic partnership to accelerate the deployment of satellite Internet in Africa and the Middle East : <https://newsroom.orange.com/orange-africa-and-middle-east-and-eutelsat-announce-a-strategic-partnership-to-accelerate-the-deployment-of-satellite-internet-in-africa-and-the-middle-east/?lang=eng>

(55) <https://www.orange.com/en/our-group/our-international-presence/africa-and-middle-east>

(56) <https://boutique.orange.fr/informations/offre-sociale/>

In Africa, Orange has been offering affordable mobile devices for all since 2019 with the range of Sanza phones developed in cooperation with KaiOS Technologies and Google⁽⁵⁷⁾. The mobile devices in the Sanza range, available in 12 countries, allow access to the Internet and are sold at an average price of 30 dollars (which may vary depending on the model and the country). They allow users to use the Internet and take advantage of the related services thanks to voice recognition, which makes them accessible to people with little or low literacy.

These two programs are monitored at the level of the CSR departments for the relevant region.

Adapting to the needs of people with disabilities

Orange is committed to meeting the usage requirements of people who have disabilities or are elderly or fragile. To do so, it draws on the expertise of its dedicated marketing and accessibility department, as well as on its research. The department selects and references adapted products and services on behalf of the Group, designs innovative solutions, coordinates a distribution channel made up of “Autonomy” branded stores and customer relationship centers, and maintains stakeholder dialogue to better identify their needs and develop partnerships. Orange is therefore implementing a follow-up in its subsidiaries of the business practices recommended by the “commitment of business leaders on sustainability practices including disability,” launched by the ILO Global Business and Disability Network and signed by Orange at the end of 2024 (see Section 4.3.2.3.2.4 *Promoting the Group’s commitments externally*).

By the end of 2025, ten Orange subsidiaries⁽⁵⁸⁾ had committed to this adapted customer experience approach, and they are gradually rolling out the components of this system. On the BtoB market in France, Orange Business also offers its customers Digital Accessibility.

In addition, a skill center dedicated to digital accessibility checks all the websites in the French scope to establish declarations of compliance. Since 2024, there have been 100 accessibility declarations for Orange websites, mobile apps and digital documents by this internal skill center.

This work is continuing for customer and business apps and web apps. The web portals of many other Group countries were also analyzed in order to estimate their accessibility level (Belgium, Botswana, Burkina Faso, Cameroon, Côte d’Ivoire, Egypt, Jordan, Luxembourg, Morocco, Moldova, Poland, Romania, Senegal, Slovakia and Tunisia).

Finally, Orange published the second edition of its Disability, Neurodiversity and Accessibility report in 2025. Based on the 2024 baseline data, it highlights the progress made in the Group’s countries and entities toward the inclusion of people with disabilities and neurodiversity (see Section 4.3.2.3.2.3 *Promoting equality and inclusion for all employees*).

4.3.5.1.4.2 Informing, training, empowering

Informing a large audience on new technologies and responsible uses

Orange is rolling out a global strategy for promoting and providing advice on safer use of the Internet and new technologies such as AI. Orange’s initiatives in this area take the form of the publication and promotion of online content (articles, tutorials, videos, digital library, etc.) on dedicated websites⁽⁵⁹⁾, social networks or customer relations portals. Through the [bienvivreledigital.fr](https://www.bienvivreledigital.fr) website in particular, Orange informs the general public about technological developments and the major issues inherent in the digital transformation of societies. In 2025, it had 366,000 unique visitors.

These actions are continuous improvement processes and do not have a defined time horizon.

Supporting and training individuals in digital technology

Given the importance of digital technology in society, Orange believes that solely providing the means of connection or services may not be enough for people who have little or no access to digital technology. Orange has implemented support programs in each country where the Group operates. Each program has a specific objective and targets and uses the most appropriate teaching methods for the situation: acquisition of basic, intermediate or advanced digital skills⁽⁶⁰⁾, implementation, awareness-raising, mobilization around a project enabling the acquisition of soft or hard skills. The main targets of these programs are women and young people, with a priority focus on young people who are not in school, not employed and not in a training program.

Orange operated around 140 support programs in total in 2025 through its 25 subsidiaries, its 22 foundations and its partners. Some programs are specific to one region, while others are offered in several.

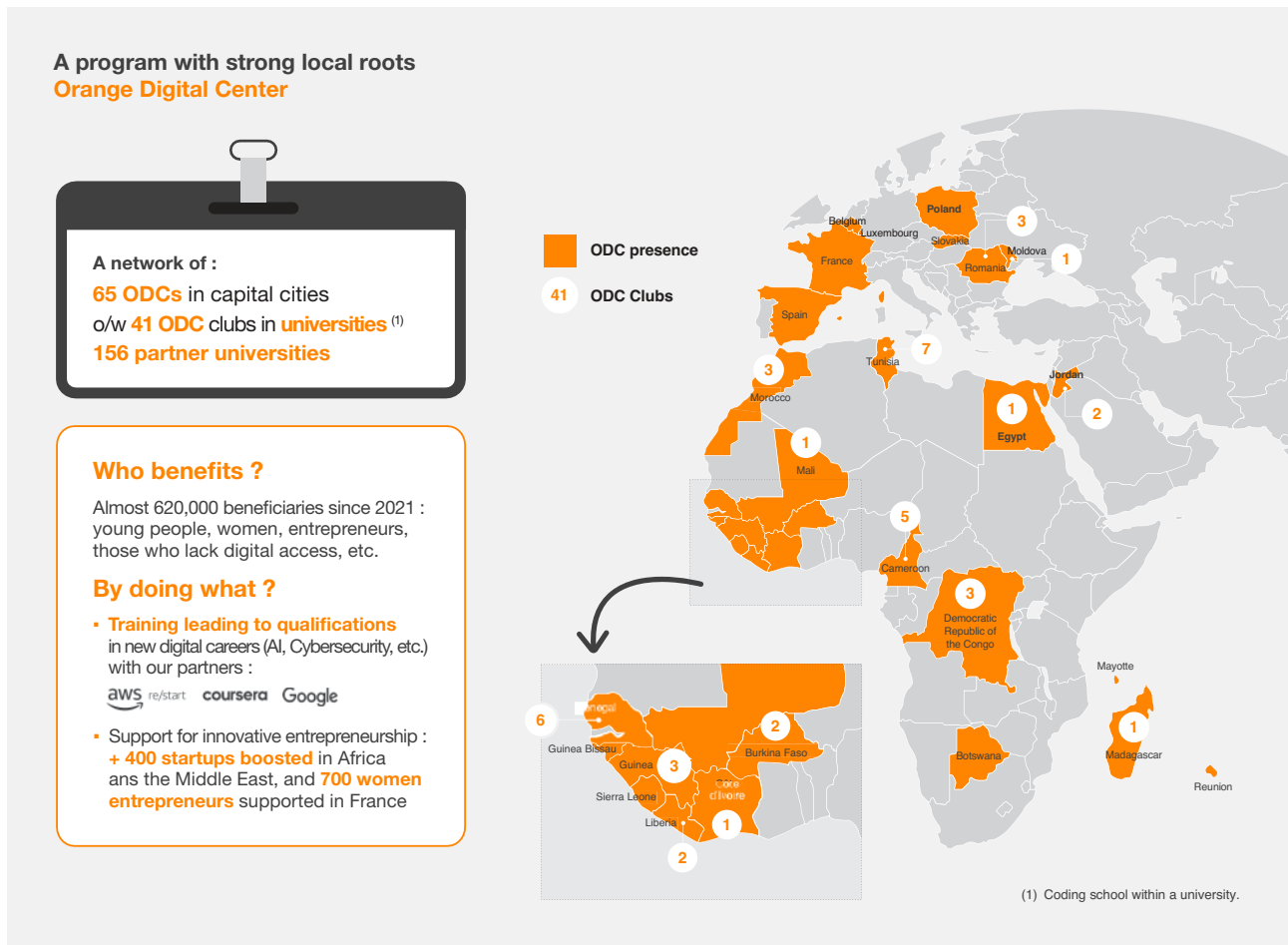
The following paragraphs describe the most representative programs and actions, with their objectives and targets.

(57) <https://orange.africa-newsroom.com/press/orange-launches-sanza-the-phone-which-democratizes-access-to-internet-in-africa?lang=en>; <https://newsroom.orange.com/orange-improves-access-to-mobile-internet-in-africa-supported-by-google/?lang=eng>

(58) Burkina Faso, Côte d’Ivoire, Egypt, France, Jordan, Liberia, Madagascar, Poland, Romania, Slovakia

(59) Some examples of content offered by Orange (not exhaustive): by subsidiaries: in Poland Razem w sieci | Orange Polska, in France Bien vivre le digital ([orange.fr](https://www.orange.fr)), in Africa & Middle East [orangedigitalcenters.com](https://www.orangedigitalcenters.com), digitaliada in Romania, through its foundations: the Orange Corporate Foundation <https://www.fondationorange.com/> and <https://www.youtube.com/@fondationorange>, the Orange Foundation in Moldova <https://fundatia.orange.md/> in Romania <https://www.fundatiaorange.ro/> and in Poland <https://fundacja.orange.pl/>

(60) Orange uses the ITU reference system on digital skills to characterize the desired level of skills. See https://www.itu.int/en/ITU-D/Digital-Inclusion/Documents/Digital-Skills-Toolkit_English.pdf p.6.

Pivotal role of the Orange Digital Centers program⁽⁶¹⁾

In 2019, Orange launched the Orange Digital Centers (ODC) program. Several significant programs have been brought together in the same space: a coding school which offers training and events; a dedicated Fab Lab which offers training in digital fabrication and prototyping projects; *Orange Fab*, an accelerator that supports start-ups in their development, and a privileged connection with Orange Ventures, the Group's investment fund which finances start-ups in Orange's areas of experience. Numerous partnerships with public and private actors allow the ODCs to join and strengthen the local digital innovation and training ecosystems in the capitals of each country where the Group is present.

In order to increase the impact of the ODCs, especially outside capitals, some subsidiaries have opened "ODC Clubs." These are the ODC's coding schools, established at universities within secondary employment areas with the intention of strengthening the professional integration of their beneficiaries. This regional coverage relies on a total of 65 ODCs, including 41 ODC Clubs, and makes the ODC networks more inclusive by reaching more people. In Europe, in addition to vocational training, the ODCs offer workshops to empower the general public to confidently use digital tools.

At the end of 2025, the cumulative total number of beneficiaries of the ODC program since 2021 was 620,000.

The ODCs' program has received specific support from the Group and its subsidiaries in order to make it Orange's flagship program for professional integration and equal opportunities at Orange.

Professional integration

The acquisition of digital skills and know-how strengthens employability. In 2025, Orange maintained its support for the building of career paths in this area, particularly for young people, women, and people undergoing integration. The programs offered for the purpose of professional integration may have various methods of action, but are all offered free of charge.

Most of them are aimed at acquiring professional skills and know-how in IT development. In 2025, in Africa & Middle East, many trainings were held at the ODCs and ODC Clubs, supplemented by hybrid trainings with online courses on Coursera.

Two programs in Africa & Middle East even offer professional training to directly exercise a profession at the end of the course. One example is the Restart program. Offered in seven African countries, it is conducted in partnership with Amazon Web Services and trains young people to become Amazon Web Services technologies Cloud technicians. In rural areas of Tunisia, Morocco and Senegal, Orange, in partnership with the Deutsche Gesellschaft für Internationale Zusammenarbeit (German Agency for International Cooperation – GIZ)⁽⁶²⁾, has launched the Master Repair project to train future technicians in the repair of electronic equipment, the installation and maintenance of solar panels and fiber optics.

(61) See concept note: <https://gallery.orange.com/element?id=474813>

(62) <https://www.giz.de/en/html/index.html>

Orange's professional integration actions have been recognized with two major awards: the Orange Digital Center Maximizing Impact Award, which rewards the Group's ability to provide training on a very large scale through its Orange Digital Centers and to transform the course of people's lives through digital technology, and the 2024 International Development Observatory award, which recognizes a lasting partnership that promotes inclusion, employment and entrepreneurship in the Group's regions.

Hello Women program

Established in 2020 in response to the lack of gender balance and the failure to promote careers for women in technical and digital roles (see Section 4.3.2.2.2.6 *Implementing actions and programs for women*), the *Hello Women* program continues to bear fruit. In Africa & Middle East, new concrete actions were carried out in 2024 and 2025, particularly in Madagascar, where nearly 1,000 female high school and University students benefited from awareness-raising sessions, training courses or mentorships. In Liberia, 250 young girls were trained for technical and digital roles. In Morocco, in partnership with Wagon Casablanca, the program was strengthened through women-only tech bootcamps for data science. This program will continue to be rolled out in the coming years.

Strengthening the autonomy, protection and responsible use of the Internet

In an increasingly digitized world, everyone should be able to access digital services independently, knowing how to protect themselves from the risks inherent in these uses, and with awareness of their responsibility toward other users.

In 2025, Orange continued its programs, which aim to improve the autonomy of digital usages on a daily basis. They cover basic digital skills and are open to anyone, but some are specifically for seniors. This is the case for the ABC seniors program in Poland and digital workshops in France. In both cases, these are short workshops on various topics: getting to know your smartphone, protecting your personal data, learning about social networks, etc.

For people in situations of social exclusion, the Orange Solidarité association in France is rolling out Inclusive Digital Workshops that focus on the basic digital skills essential for inclusion in society: using a digital device, creating an email address, using a word processor, creating a resume, etc. Since its creation in 2007 by the Group and the Orange Foundation, the association, which is mainly supported by Orange employees and offers skills-based sponsorship, has worked with 450 associations.

Orange also works with children and young people by holding workshops and promoting the #ForGoodConnections initiative. The actions taken for these populations are detailed in Section 4.3.5.3.5 *S4-4 Taking action on the material impact on consumers and end-users, and effectiveness of those actions linked to the health and well-being of users, including children*.

Orange encourages the systematic measurement of how well the lessons learned in these digital workshops have been absorbed and, to that end, sends a questionnaire to participants. The Group thus calculates a Net Promoter Score (NPS) to determine participants' interest and how likely they are to recommend these actions to others. At the beginning of 2025, the NPS for participants in online workshops was 52.1, and reached 70 for in-person workshops, based on a survey of 3,372 respondents in France. For children, when asked "do you feel better equipped to handle the risks of digital technology?," 75% of the children interviewed said yes, out of a sample of 4,300 children in 11 Group countries in first half 2025.

Education assistance

Digital technology in schools promotes access to education for those without it, especially children who are not in a positive environment for learning. The objective is to reduce the number of children who drop out of school by offering them the opportunity to develop their potential and find their way. By relying on associations, and in partnership with the local education departments, Orange develops the digital skills of students and teachers, in a secure and ethical framework and by offering innovative educational content and tools that are accessible without an Internet connection because they are integrated into digital media (tablets or smartphones). Many programs have been developed to this end by Orange subsidiaries and foundations, such as the Digital Schools program, rolled out in 16 Africa & Middle East countries, which enables 600,000 students in 1,700 beneficiary schools to access a substantial amount of free educational content by right, with the material provided in the kits. A partnership with the UN Refugee Agency (UNHCR) has made it possible to extend this program to populations of young refugees, including in Moldova in 2024 and 2025. In addition to training students, Orange subsidiaries and foundations also help train teachers on the use of digital resources. In 2024, the Orange Polska Foundation secured regional and European funding to train teachers on the use of digital educational resources over the next few years in ten regions of Poland.

Finally, the new Orange Foundation program entitled "Apprendre Autrement" (another way to learn) is aimed at young people experiencing exclusion. It seeks to mobilize them through a concrete project that combines digital technology and self-confidence and is intended to help bring back the joy of learning.

4.3.5.1.4.3 Developing the socio-economic fabric

Mobilizing public-private partnerships with stakeholders in the regions to achieve the Sustainable Development Goals related to digital inclusion

Orange works with local economic actors (public and private) and with international development actors such as UN agencies, the European Union, the African Development Bank and the main development and cooperation agencies. The aim of this collaboration is to bring Orange's economic interests (network and service roll-outs, coverage expansion, acquisition of new customers) into line with local socio-economic development. The collaborations also aim to share expertise on the socio-economic development of the regions through digital technology. Several of these cooperations are cited in this report in the relevant themed sections.

In particular, Orange entered into a strategic partnership with the French Development Agency (*Agence Française de Développement* – AFD) group in June 2025 for a three-year period. Through this partnership, Orange has become the AFD group's strategic partner for digital technology: this groundbreaking new agreement with a telecom operator seeks to enhance cooperation between the two groups to promote access to digital services, support innovation and accelerate the environmental transition in their shared areas of operation.

In November 2025, Orange also signed an 80 million euro loan to Orange Mali with IFC and the West African Development Bank to expand its fiber optic network in rural areas to cover around 300,000 households and small businesses in the country (see Section 4.3.5.1.4.1). This type of financing ties the cost of borrowing to the achievement of measurable objectives. It is based on a direct contribution to SDG 5 Gender Equality and SDG 10 Reduced Inequalities, since it also calls for Orange Mali to increase the proportion of women benefiting from its digital training programs to 70% by 2032.

Finally, Orange uses subsidies from the European Union to maximize the impacts of connectivity on the development of the regions. For example, Orange and its public and non-profit partners obtained a 2.5 million euro subsidy in Romania from the European

Union (through the Connecting Europe Facility⁽⁶³⁾) to strengthen 5G connectivity in the Danube Delta, as well as the related benefits: training local populations on digital tools (e-government, e-health), discovering the potential of digital technology in schools through the expansion of the Digitaliada program and equipping them with tablets, improving professional integration through the creation of an Orange Digital Center branch, and developing start-ups for essential services, particularly in the field of environmental protection and telemedicine.

Conducting research projects on the link between connectivity, uses and socio-economic development

Since 2017, Orange has been conducting studies on its socio-economic footprint. The research work carried out by the Group makes it possible to better understand the impact of telecommunication and digital services on the populations that have little or no access to them or whose uses are underestimated. Orange Innovation regularly conducts studies in this field.

For example, a study was conducted on the uses of international money transfer apps by the Malian and Senegalese diasporas as part of the Inclusive Digital Financial Services research program.

It has also implemented social impact assessments to measure the effects of its activities. The Impact Track tool, in use since 2022, facilitates the measurement and management of social impact, enabling reporting on various programs. In 2025, new impact studies were launched with Impact Track on the program to support women's empowerment in Guinea. The Orange Foundation has supported the creation of women's economic interest groups (EIGs) in Mamou and Conakry. The EIGs are then provided with digital equipment and management training to increase the number of local market gardening actions: production, marketing and savings. Thus, the average monthly income of women participating in the program increased, in 12 months, from less than 30 euros for 80% of them to between 30 euros and 55 euros for 74% of them.

In 2023 and 2024, Orange participated in the production of a report on the impact measurement of digital inclusion actions titled "Faire numérique ensemble" (Doing digital together)⁽⁶⁴⁾ with NGOs, academic experts and companies. This report is aimed at public and private actors in digital inclusion. It establishes recommendations and proposes solutions to combat digital divides. The approach is based on the creation of a benchmark of sectoral impact metrics. In 2025, Orange worked to operationalize this benchmark with its partners, including MedNum. Orange has been a partner of the Impact Measurement Summit⁽⁶⁵⁾ since its first edition.

These actions constitute a process of continuous improvement and do not have a defined time horizon.

4.3.5.1.5 S4-4 – Taking action to pursue the opportunity related to digital inclusion and equality

4.3.5.1.5.1 Offering inclusive services that complement connectivity

Expanding coverage generates new business opportunities for Orange through the essential services that can then be marketed, with a particularly notable impact on women. According to the

GSMA, the digital inclusion of women in middle- and low-income countries could, over an eight-year period, generate 230 billion dollars in additional revenues for the mobile industry⁽⁶⁶⁾.

As part of its overall development approach, Orange offers services to cover the basic needs of populations, based on its connectivity offer. Orange has identified several areas: access to financial services, to energy, to health and education and – in the Africa & Middle East region – to agriculture (*mAgri*, a range of decision making-support services for the agricultural world that also allows virtual marketplaces to be created).

These actions are part of continuous improvement processes and do not have a defined time horizon.

Accelerating the development of AI in local languages while respecting right holders

Orange is involved in the roll-out of more inclusive artificial intelligence solutions, which will enable the development of many products or services in local languages, including customer service in local languages. For example, in Europe, Orange Polska and Orange France are participating in the innovative collaborative project "LLMs4EU" aimed at developing large language models (LLMs) for European languages. This effort was launched in 2025 thanks to co-financing from the European Union⁽⁶⁷⁾. Orange is also collaborating with OpenAI and Meta to incorporate African regional languages into their generative AI models on an open-source basis, enabling the development of commercial and non-commercial services⁽⁶⁸⁾.

Achieving emancipation through financial inclusion

The roll-out and number of active Orange Money customers is described in Section 1.4.3. Africa & Middle East. By making money transfers, account creation, savings and credit possible, Mobile Financial Services promote greater financial autonomy for individuals, access to financing for those wishing to create income-generating activities and investment by small businesses in their development. These achievements support economic development and allow governments to levy taxes and provide support to vulnerable households. Orange has created electronic money institutions to ensure the security and compliance of financial transactions. In addition, Orange Bank Africa offers loan and savings services (see Section 1.2.3.8 *Mobile Financial Services*).

Furthermore, diasporas are one of the pillars of economic development in Africa. As the most established European telecom operator in the Middle East and Africa, Orange serves a substantial number of both permanent and temporary African residents across Europe (special mobile rates, Orange Money). To facilitate their contributions, Orange provides diasporas with financial inclusion solutions such as Orange Money, which allows them to send money to more than 30 countries and refill prepaid accounts remotely. To increase the positive participation of diasporas in both their countries of residence and their countries of origin and to expand the opportunities for new related services, Orange conducted a study with CREDOC in three countries (1,500 people from the first and second generations of North African and sub-Saharan diasporas in France, Belgium and Spain). The results were reported in November 2025 and a summary was posted online⁽⁶⁹⁾.

(63) <https://5glab.orange.ro/en/5g-connect-danube-delta-en/>; <https://ec.europa.eu/info/funding-tenders/opportunities/portal/screen/opportunities/projects-details/43251567/101181137>

(64) Groupe de travail Inclusion numérique | Impact Tank (impact-tank.org).

(65) Sommet de la Mesure d'Impact – 2^e édition – L'Agenda 2030 en France (<https://www.agenda-2030.fr/en/>).

(66) <https://www.gsma.com/r/wp-content/uploads/2024/10/The-State-of-Mobile-Internet-Connectivity-Report-2024.pdf>

(67) <https://ec.europa.eu/info/funding-tenders/opportunities/portal/screen/opportunities/projects-details/43152860/101198470>

(68) <https://newsroom.orange.com/orange-to-expand-open-source-ai-models-to-african-regional-languages-for-digital-inclusion/?lang=eng>

(69) CRÉDOC – Research Center for the Study and Observation of Living Conditions (Centre de Recherche pour l'Étude et l'Observation des Conditions de vie); <https://www.credoc.fr/>

Developing activities through the energy inclusion of as many people as possible

In Africa & Middle East, Orange works with Orange Energies (see Section 4.2.2.2.4.3 *Offering energy services in Africa & Middle East*) to offer individual solar kits, accessible via payment in installments, enabling households that are not connected to the electricity grid to produce their own electricity. These kits include a solar panel, LED lights, various accessories and can be used to charge mobile devices. For connected customers, Orange offers an “electricity wallet” that allows consumption to be managed via a smart meter, thus improving the relationship with electricity operators. This service also enables the development of a new BtoB customer base through business kits sold as add-ons: “barber” kits to launch hairdressing salons, “freezer” kits for food-related activities, and “irrigation” kits for market gardening activities, etc.

Providing digital access to healthcare services

Digital technology is a powerful driver of the transformation of the healthcare system. Orange has launched a subsidiary dedicated to e-health under the leadership of Enovacom in Europe (see Section 1.4.4 *Orange Business*). Orange is also a partner in Future4Care, which brings together a community of industrial groups, experts and start-ups to accelerate the adoption of e-health in Europe. By the end of 2025, more than 120 start-ups had been involved in an acceleration program since the creation of Future4Care.

In the area of digital accessibility, the Group has partnered, since December 2024, with Handilab, the first innovation, disability and autonomy cluster in France, the aim of which is to work toward the creation of new inclusive services and business models, allowing for a better consideration of disability in society. By providing its partner start-ups with Handilab spaces, Orange accelerates research and development around future marketable services.

In Africa & Middle East, Orange is working with the health authorities to offer information and advisory services via mobile, facilitating access to care in disadvantaged areas. Initiatives such as M-Vaccin and SenVitale allow remote monitoring of vaccinations and maternal health. Orange also offers insurance and geolocation services to improve access to healthcare. In partnership with The Global Fund⁽⁷⁰⁾, a digital platform has been set up to monitor HIV and TB patients in Morocco and other African countries. These efforts are aimed at improving access and quality of care for populations.

4.3.5.1.5.2 Supporting entrepreneurship

In the Africa & Middle East region, Orange supports and develops innovative entrepreneurship with tailored support throughout the life cycle of start-ups, up to financing, in every country where it operates. Local entrepreneurship allows for the creation of services that are more relevant and better suited to the needs of the communities. This local relevance is a key driver of mobile Internet adoption, according to the GSMA. In addition, in most cases these start-ups become Orange customers or technological and commercial partners, which helps enhance the Group's offers.

Innovative entrepreneurship

The international network of *Orange Fab* accelerators supports start-ups in many Group regions through intensive programs of three to six months. In 2025, *Orange Fab* accelerated 102 start-ups, including 62 in Africa & Middle East, 25 in France and 15 in the rest of Europe. As such, 18 women CEOs have been supported through the program. The biggest *Orange Fab* contributors in the Africa & Middle East region are Morocco, Guinea and Cameroon. Most of these start-ups integrate technologies provided by Orange

(Cloud, payment bricks, connectivity solutions, etc.) and enhance the Group's offer of BtoC and BtoB services. In Poland, the Liki mobile start-up and its spin-off MBBOak are thus completing their third year of collaboration within *Orange Fab*, having successfully marketed several joint solutions in the fields of energy, artificial intelligence and critical infrastructure management.

In France, Femmes Entrepreneuses is a program to accelerate start-ups founded by women in the technology sector. More than 700 women entrepreneurs have benefited from the program since 2018. In 2025, nearly 100 women benefited from training and mentoring, with a geographical distribution in all French regions. They also forge business development ties with Orange whenever possible.

With Orange Ventures and Orange Digital Investment, Orange supports technology start-ups and innovative projects in various fields. With 350 million euros, Orange Ventures acts as a catalyst between the ecosystems, the Group's innovation capabilities and the most promising start-ups. Since its creation at the end of 2020, Orange Ventures has made more than 30 investments. Through its Impact fund of 30 million euros, Orange Ventures also targets the areas of the environment, the circular economy and inclusion. In Europe, Orange Ventures finances mature start-ups as well as younger companies supported by the Impact fund. In Africa & Middle East, the fund supports the development of future continental champions and start-ups in the 18 countries where Orange operates. Orange Ventures has partnered with Digital Africa (Proparco) and the Flat6Labs venture capital platform to create synergies in evaluating applications, and in co-investing in start-ups from the Orange Digital Center network⁽⁷¹⁾.

Local entrepreneurship

Orange supports ideation by organizing competitions for young people in 14 countries (Orange Summer Challenge program). Orange supports social entrepreneurship with the Orange Social Venture Prize in Africa & Middle East (POESAM) in all countries in Africa & Middle East. Since its creation in 2011, POESAM has received nearly 17,600 applications, and more than 60 entrepreneurs have shared 0.8 million euros of financial support. In 2025, POESAM received nearly 3,000 applications, a record increase of 85% compared to the number of applicants in 2024, proof of its undeniable success. In addition, this year Orange Middle East & Africa signed a strategic partnership with RisingSud, the economic development agency in the Provence-Alpes-Cote d'Azur region, to support the establishment and growth of African start-ups from the Orange Digital Center network in the South of France⁽⁷²⁾.

Through its purchasing policy, Orange also supports innovative local ecosystems. Orange is thus a partner of the “Je choisis la French Tech” (I choose French Tech) program and contributes to French Tech's start-up/key account relationship observatory (*Observatoire des relations startups/grands comptes*). Orange is one of the ten leading French groups that have collectively pledged to invest 1 billion euros in French Tech start-ups and scale-ups⁽⁷³⁾. In 2024, Orange sourced supplies from 595 start-ups in the French Tech ecosystem.

To create sustainable jobs in the regions where the Group operates, Orange develops partnerships to support very small enterprises. For example, in 2025, in partnership with the European Union and German federal enterprise GlZ, Orange and Agrinova started a program to support an inclusive agri-tech ecosystem in Burkina Faso. In 2024 and 2025, Orange also supported UN Women's “Buy from Women” project in Liberia, aiming to strengthen the digital and financial inclusion of women farmers.

(70) <https://www.theglobalfund.org/en/>

(71) <https://newsroom.orange.com/orange-ventures-and-digital-africa-commit-to-jointly-invest-in-startups-from-the-orange-digital-centers-network-in-africa-and-the-middle-east/?lang=eng>

(72) <https://newsroom.orange.com/orange-middle-east-and-africa-and-risingsud-join-forces-to-facilitate-the-establishment-and-development-of-startups-in-the-south-of-france?lang=eng>

(73) <https://lafrenchtech.gouv.fr/fr/je-choisis-la-french-tech-1-milliard-deuros-mobilises-par-10-grands-groupes-a-destination-des-startups-francaises/>

Social and solidarity economy (SSE)

The cooperative sector and the social and solidarity economy (SSE) sector more broadly are undergoing normative globalization and are considered an alternative development path from an economic, social and environmental standpoint. The SSE is recognized by public actors and international organizations as a key solution to achieving the 2030 Sustainable Development Goals. Cooperatives have more sustainable and resilient activities in times of crisis, and are an appropriate model for advancing gender equality and women's empowerment.

Around the world, cooperatives and the wider social and solidarity economy account for 7% of global GDP, with 280 million people working for a cooperative, and there are 10 million social enterprises, or 3% of all companies worldwide.

Inclusive and solidarity-based purchasing is a way of encouraging actors to play their role in the value chain of the so-called traditional economy by supporting the development of the SSE sector.

In 2025, an initial estimate of Orange's purchases in France from the SSE sector, according to the INSEE classification, put them at around 84 million euros (see Section 4.3.3.2.4.4 *Promoting inclusive and responsible purchasing*). Orange also partnered with ESS Forum International, the France-Africa Partnership for Co-development (PFAC), and the Africa Cooperative Alliance to host the first Coopday⁽⁷⁴⁾ on December 11, 2025, marking the close of the International Year of Cooperatives. The objective was to better identify the levers offered by digital technology to support the development of this segment of customers.

In Africa, a significant portion of activity relates to SSE but it has not yet been properly measured, as 86% of jobs are in the informal sector. This sector is expanding, as evidenced by the African Union's ten-year strategy for the SSE, which highlights the development of cooperatives as one of the goals of the 2030 Africa Plan.

Based on all these findings, the Group's CSR departments and Orange Innovation have launched a preliminary study to assess Orange's contribution and to organize and even propose innovative responses in terms of digital and financing solutions. The first phase of identifying and analyzing Orange's contribution concluded in September 2025. The second phase of the project involves working with beneficiaries to co-develop responses to their needs. The third phase in 2026 will be to assess the financial, physical and social impact of an innovative value proposition for Orange and its stakeholders.

However, many services provided or marketed by Orange are already aimed at this sector, particularly in the field of financial services. With this in mind, Orange Bank Africa partnered in

2023 with the International Finance Corporation (IFC) to increase digital lending to small businesses in West Africa, including in rural areas. A guarantee facility will cover 50% of a portfolio of eligible short-term loans, up to a maximum of 30 million dollars. This should allow Orange Bank Africa to distribute 300,000 additional loans in the future⁽⁷⁵⁾.

4.3.5.1.6 S4-5 – Targets related to advancing positive impact concerning digital inclusion and equality

In connection with the material positive impact related to digital inclusion, Orange has set a target of providing free digital training and workshops to 2.5 million people by the end of 2025 (cumulative figure for 2021–2025) and 6 million people between 2021 and 2030. The number of people benefiting from these programs contributes to this objective, and the trajectory of reaching the target is monitored by the Group's CSR Department.

This target has been defined at Group level using a multi-dimensional approach: studies and benchmarks⁽⁷⁶⁾, the creation of an inventory of the initiatives of Orange subsidiaries and foundations carried out in 2021 and, lastly, a centralized proactive approach to merge these initiatives and ensure that they contribute to the Group's objectives.

A beneficiary is defined as follows:

- a person or organization that Orange has helped to acquire digital skills, in person or online, regardless of length or form. This can mean workshops, training courses or MOOCs, webinars, hackathons, master classes, etc. Beneficiaries include people who benefit from programs specific to Orange and those offered by Orange's partners and the Orange Foundation, as well as organizations, such as the start-ups that have received support;
- a beneficiary is equivalent to a participant in one of the programs, and the same person can represent several beneficiaries;
- Orange has drawn up a list of programs eligible to contribute to the number of beneficiaries; the selection criterion for programs is that the learner is supported by Orange or its partners;
- an estimated percentage of all the people currently counted as beneficiaries of training via the Digitaliada platform in Romania reportedly actually benefited from training, with the others having only taken one or more one-off actions on the platform. Work is underway to better understand how beneficiaries use the platform.

There was no change in the definition for the counting of beneficiaries in 2025.

Number of beneficiaries supported in the acquisition of digital skills since 2021	2023	2024	2025	Target 2030
Group total	850,000	668,000	890,680	
Cumulative Group total	1,799,000	2,467,000	3,358,000	6,000,000

In total in 2025, 890,680 beneficiaries received the support of facilitators and trainers from Orange, its foundations or their partners.

The trajectories are in line with the Group's expectations, with a cumulative total of 3.358 million people reached in 2025.

Furthermore, Orange has not identified a target associated with the opportunity linked to inclusion and equal opportunities and does not disclose metrics on the effectiveness and efficacy of its action plans in its 2025 sustainability statement.

(74) A look back at the Coopday in Dakar on December 11, 2025: <https://www.essforuminternational.com/retour-sur-le-coopday-de-dakar-du-11-decembre-2025>

(75) <https://www.ifc.org/fr/pressroom/2023/27646>

(76) See, for example, the GSMA studies or the World Benchmark Digital Alliance digital inclusion reports: Digital Inclusion Benchmark.

Digital trust

4.3.5.2 Management of IROs related to personal data protection and cybersecurity

4.3.5.2.1 ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

In its double materiality analysis, Orange identified:

- a negative impact on the privacy of end-users in the event of a breach of the security of personal data: each of its customers may be affected by this negative impact, as their right to privacy and to protection of their personal data may be compromised. However, Orange has not determined how its customers with specific characteristics or using specific products and services may be more exposed to a risk of harm. This is an impact related to isolated and non-systemic incidents;
- a material reputational and financial risk in the event of a breach of the security of end-users' personal data: this risk arises from the negative impact resulting from a breach of the security of personal data.

Users of digital technologies are increasingly sharing information, especially personal data. They expect full transparency from Orange on the possible use of their data and their security, at a time of rapidly evolving cyber threats. To address these expectations, the risk and the negative impact identified, Orange is making every effort to promote the protection of the personal data of the users of its services and to respect their privacy. This is taking concrete form in three ways: the security of their personal data; transparency on the use of these data; and respect for their rights to these data, in accordance with local and international regulations, and in particular control over the data when they interact with Orange. The objective is, first, to give users confidence in the use of the personal data they entrust to it and, second, to minimize the risks of data breaches. Protecting its customers' data and securing its networks are an integral part of Orange's role as a trusted operator.

4.3.5.2.2 Governance

The Board of Directors is responsible for overseeing risk management, including monitoring risks related to cyber threats and personal data protection.

A risk report is presented every year to the Audit Committee, which regularly assesses the Group's risks, including the effectiveness of risk monitoring tools, the major risks facing the Group and the preventive measures taken. The Audit Committee submits its analysis to the Board of Directors, which may suggest improvements and oversees the implementation of the proposed measures.

In 2020, the Orange Board of Directors and Executive Committee validated the data security components, in particular personal data, their status and the Group's objectives (see Section 2.1.3.3 *Group security policy*). As a result of a decision made in 2024, the monitoring of the security policy's implementation must be presented each year to the Executive Committee and to the Board of Directors.

The Group Security Department has responsibility for monitoring cybersecurity risks. It also periodically presents to the Executive Committee its cybersecurity risk analysis, the risk mitigation plan, the security objectives, the results of self-assessments of the various Orange entities, the key performance indicators for security and the findings from the cybersecurity audits. In addition, it chairs

the Group Security Committee (GSC), made up of all the security directors from the entities; this Committee meets regularly to review Orange's overall cybersecurity strategy and resilience, and in particular to monitor the implementation of the security policy, compliance with the requirements set out in the security standard, and the publication of new security policies.

At the Group level, the Executive Committee has also named a Group Data Protection Officer (DPO) to coordinate actions on personal data protection. With support from a specialized department within the Group's Legal Department, which reports to the General Secretariat, the Group DPO ensures the implementation of the various legal frameworks.

4.3.5.2.3 S4-1 – Policies related to consumers and end-users linked to personal data protection and cybersecurity

The management framework related to the negative impact on privacy and the reputational and financial risk in the event of a breach of the security of personal data is based on three policies: the security policy, the personal data protection policy and the Group human rights policy. These policies apply to the personal data of all Orange customers, users of its services, and its employees.

They meet the data protection and security needs of Orange's users, employees and customers, as well as the requirements of the regulators and the authorities, in particular those responsible for personal data protection or network resilience. They apply to all Group regions and activities and address all Group employees, suppliers and partners.

4.3.5.2.3.1 Group security policy

The Group security policy addresses the protection of individuals, in particular employees, the Group's information and customer data, its offers, products and services (telecom services, financial products and services, etc.), its business processes, and all intangible assets and property, plant and equipment, including IT&Networks infrastructure.

Using a risk-based approach, it defines the main security principles aligned with the Group's strategic goals, calls for compliance with supranational and national laws and regulations where the Group operates and adopts practices consistent with international standards and guidelines. Security is monitored over time and is part of a continuous improvement process, based on the "anticipate, prevent, protect, assess" loop.

To guide its actions, the Group applies international standards such as ISO 27001 for information security and ISO 27005 for risk assessments. These standards help to enhance security management at the entity level by providing a common Group-wide framework; this framework addresses the requirements of Directive (EU) 2022/2555 of December 14, 2022 on measures for a high common level of cybersecurity (known as the Network and Information Security 2 Directive, or NIS2).

The Group security policy also sets out the organization of security within the Group, the role of the Security Department and the responsibilities of each entity and individual regarding security.

It has to be enforced by Executive Committee members and by the Directors of the various entities, who implement it by allocating the necessary resources. Any departure from the policy's principles is formalized through an exemption process.

Each entity director is responsible for security within his/her scope. These directors ensure that the goals are met by committing the necessary means and resources. To that end, they coordinate security by relying on their Chief Security Officer and Head of IT and Network Security, who work closely to implement the objectives set by Group Governance. A security assessment is presented to the entity's management and then transmitted to the Group Security Department at least once a year. It includes the risk mapping, the status of the action plans underway, any security incidents that occurred, the audits, the training conducted, and the resources allocated. The director of the entity, who guarantees ownership of the essential (vital and critical) assets for the Group, ensures that the risks are identified, mapped, and addressed.

In 2025, several topics in the security policy were updated, in particular business continuity management (see Section 4.3.5.4.2.1 *Business continuity and crisis management policy*).

The policy is made available to all stakeholders on Orange's website at www.orange.com⁽⁷⁷⁾. Orange promotes this policy among its employees and conducts awareness-raising and training actions, in particular through the Cyber Ready program. The policy is also promoted among partners and service providers. In accordance with the risk-based approach, supplier contracts include a security clause.

4.3.5.2.3.2 Personal data protection policy

The personal data protection policy sets out the personal data protection principles of lawfulness and legitimacy, transparency and fairness, data minimization, data accuracy, storage limitation, security, respect of personal rights (right to access, rectification, erasure, restriction, objection, portability) and privacy by design. It outlines the governance, documentation, and service provider assessments and promotes a personal data protection culture. It also specifies how Orange manages international transfers of personal data and access to data by the competent authorities. It covers all the personal data processing carried out by Orange, whether directly by its entities or when contracted to partners or service providers, and regardless of the data subject category, such as employees, customers and users of the services.

This policy was updated in December 2024⁽⁷⁸⁾.

The personal data protection policy is implemented under the responsibility of Orange's Chief Executive Officer and, by delegation, in each entity under the responsibility of its director, who ensures that risks are mapped and addressed in an appropriate management framework.

The Group DPO participates in internal data governance committees and coordinates a network of DPOs and liaison officers.

Operational monitoring of the personal data protection program is carried out by the Group Security Department and by the Personal Data and Security Department of the Group Legal Department, which also ensures the implementation of the various legal frameworks.

Application of the policy is audited under the security policy and, through its assignments, the dedicated internal audit team helps the Group maintain an appropriate control system by assessing its compliance, effectiveness and efficiency and issuing observations and recommendations for its continuous improvement.

Orange is committed to having all Group entities and all its employees worldwide apply the principles set out above and to complying with the various local regulations applicable in the

countries where Orange operates, such as the General Data Protection Regulation (GDPR) in Europe. Regulatory frameworks may exist or be under development, and sometimes may cover only some of the geographic regions. Orange therefore takes a global approach applicable in all countries, in compliance with local regulations. This approach integrates anticipatory measures and change monitoring, similar to its approach to the ethical and responsible use of AI.

In 2024, Orange sought to make its policy more transparent by giving all stakeholders access to its personal data protection policy on www.orange.com; this policy supplements the Group's internal personal data protection policy, which has existed since 2021.

In addition, specific versions of the policy have been developed for stakeholders that may be affected. Accordingly, Orange has created a version for Enterprise customers, published on the orangebusiness.com website; versions for customers and users of its services on the countries' commercial sites; and a version for employees.

Orange promotes a culture of personal data protection among its employees through awareness-raising and training actions, as well as with partners and service providers who are also subject to specific obligations under applicable laws. In addition, Orange has included a "data security and protection" clause in its supplier code of conduct, which applies to all Group contracts.

4.3.5.2.3.3 Group human rights policy

In its human rights policy, Orange reiterates its commitment to protecting the data and digital identity of its customers and users and not restricting their right to privacy and freedom of expression. This policy is detailed in Section 4.3.1.1 *Group human rights policy*.

Orange is thus implementing the principles enshrined in Article 12 of the Universal Declaration of Human Rights, in the Charter of Fundamental Rights of the European Union, in Conventions 108 and 108+ of the Council of Europe, and in the Economic Community of West African States' Supplementary Act, which guide the personal data protection procedures.

In addition, Orange is a member of the Global Network Initiative (GNI) multistakeholder platform, which provides the ICT industry with principles and guidelines to promote a responsible framework for freedom of expression and privacy. Through this membership, and in the same way as other members, the Group pledges to respect and implement these principles in order to protect personal security, protect identity and promote users' freedom of expression (see Section 4.3.5.4.5.4 *Responding to government injunctions*).

4.3.5.2.4 S4-2 – Processes for engaging with consumers and end-users about impacts linked to personal data protection and cybersecurity

The development of Group personal data protection and security policies was based on the expectations of internal and external stakeholders (see Section 4.1.3.2 *SBM-2 – Interests and views of stakeholders*). Internally, the communities of stakeholders involved in both personal data protection and security helped develop these policies. Externally, studies and customer feedback, and regular discussions with the authorities, rating agencies and ecosystem players informed this policy. Orange assesses the effectiveness of its engagement with its stakeholders, through sharing the analysis of their results.

(77) Orange group security policy: https://gallery.orange.com/en/element?id=411907%23state=146c6b4c-2071-472f-829b-a1044ca116ea&session_state=92dc0b42-79f1-4192-9f2f-09ae30d6b1e7&iss=https%3A%2F%2Fauth.keepeek.com%2Fauth%2Frealms%2Fmastermedia&code=9a30525f-21ce-419f-ae9-44f7c8bd945e.92dc0b42-79f1-4192-9f2f-09ae30d6b1e7.e434ff80-c33f-43d3-b862-7d4e8f9b47ca#iss=https%3A%2F%2Fauth.keepeek.com%2Fauth%2Frealms%2Fmastermedia

(78) Orange's policy on the protection of personal data: <https://gallery.orange.com/en/element?id=410212%23iss=https%3A%2F%2Fauth.keepeek.com%2Fauth%2Frealms%2Fmastermedia#iss=https%3A%2F%2Fauth.keepeek.com%2Fauth%2Frealms%2Fmastermedia>

Orange has informed its customers that a contact person is made available for each instance of processing, which allows them to exercise their rights relating to their personal data. A Data Protection Officer (DPO) in the relevant country is also available and information on how to contact them (mailing address, email address) can be found on the Orange website for that country. In addition, the contact information for the Group DPO can also be found on Orange's website at www.orange.com.

4.3.5.2.5 S4-3 – Processes to remediate the negative impact and channels for consumers and end-users to raise concerns linked to personal data protection and cybersecurity

4.3.5.2.5.1 Remediation process

Orange has developed a process for managing breaches of the security of personal data; this covers relations with data subjects and the authorities, as well as correction and improvement methods. This process is defined for each entity or country.

If the security of its users' data is breached, Orange informs the authorities and the users in accordance with the regulations. Orange supports its customers based on the type of data breach and its level of impact, on a case-by-case basis, and, as needed, implements the necessary corrective or improvement measures.

A user account may be suspended if a complaint is made to the Abuse unit (see below).

4.3.5.2.5.2 Whistleblowing channels

A reporting channel has been set up for email abuse related to the orange.com domain and anyone can contact the Abuse unit, an entity established by Orange in France to handle complaints about unlawful actions by subscribers relating to emails, such as spam, phishing and illegal comments on forums.

A reporting channel has been set up for security incidents and anyone can contact Orange's Computer Emergency Response Team (CERT). Orange's CERT is the operational entity responsible for managing information system security incidents at Orange, including all Group entities and subsidiaries. Its role is to collect and analyze information on the threats and vulnerabilities that leave the Group exposed, to inform the stakeholders affected and to help them if an incident occurs. It coordinates all the relationships with external entities (other CERTs, other operators, web hosts, social networks, suppliers, researchers, whistleblowers, etc.) and with the security teams in all Group entities, countries and subsidiaries. It undertakes to respond to any vulnerability or information brought to its attention and to find a solution within a reasonable time frame, while keeping the reporting party regularly informed.

The contact information for CERT and the Abuse unit can be found on Orange's website at www.orange.com⁽⁷⁹⁾. However, Orange has not formalized a Group process by which it encourages the provision of these channels with its business relationships and by which it guarantees their effectiveness. Similarly, the Group has not put in place a process to assess whether its customers are aware of and trust this alert channel.

In addition, a Group whistleblowing system exists, called *Hello Ethics*. It is detailed in Section 4.4.2.4 *Group whistleblowing system*.

Finally, customers can also contact Orange via the customer relationship channels as described in Section 4.3.5.5.3 *S4-3 – Processes to remediate negative impacts and channels for consumers and end-users to raise concerns linked to responsible marketing and information practices*.

4.3.5.2.6 S4-4 – Taking action on the material impact and risk related to consumers and end-users, and effectiveness of those actions linked to personal data protection and cybersecurity

To avoid causing or contributing to the material negative impact resulting from a personal data breach and to manage the reputational and financial risks in the event of a breach of the security of personal data, Orange has implemented the action plans described below.

Orange assesses the effectiveness and efficacy of its action plans to prevent or mitigate the negative impact identified through its Vigilance Plan (risk concerned: breach of privacy). However, Orange has not yet defined a Group process to assess the effectiveness of remediation measures in the event of a contribution to an actual negative impact, or a Group process aimed at identifying the actions necessary to address or remedy the material negative impact of privacy failures.

Furthermore, Orange does not have a systematic process for identifying the resources associated with each action and discloses this information in part.

4.3.5.2.6.1 Rolling out the personal data protection program

Plan for continuous improvement in personal data protection practices

Regulatory activity has been intense for data protection, particularly in Europe. Many topics are addressed by the authorities in the form of guidelines, opinions and recommendations. This activity is monitored continuously. These regulations are therefore highlighted when coordinating personal data expert networks, at monthly committee meetings and at various internal events. This is done through specific presentations and can result in action plans to ensure Orange's compliance.

For example, in 2024 and 2025 the "PrivacyForApps" program in France focused on a systematic review of mobile apps, in order to ensure their compliance with the regulations issued by the *Commission nationale de l'informatique et des libertés* (French data protection authority – CNIL). They specify that it is important to:

- clarify and frame the role of each stakeholder;
- improve user information on the use of their data at the right time in the app, to ensure that users understand whether the permissions requested are really necessary for the app to work;
- ensure that consent is informed and not forced.

In Africa & Middle East, due to the recent amplification of the topic of data protection, the organization is gradually being strengthened.

This is a process of continuous improvement and has no defined time horizon.

(79) <https://www.orange.com/fr/cert-Orange>

AI and data project

Given, on the one hand, the acceleration in the use of AI on the market – and of generative AI in particular – and the questions that it raises, and, on the other hand, the entry into force of the new European regulation on artificial intelligence (Regulation (EU) 2024/1689 of June 13, 2024), Orange mobilized its teams in 2025 to ensure its compliance. Data Protection Officers and their liaison officers at the entities contribute when personal data processing is involved.

For example, Dinootoo, the generative AI tool for Group employees, integrates caution points regarding the use of personal data. In addition, personal data protection is systematically addressed in the AI and Data Ethics Committee in reviews of use cases that integrate AI.

This is a process of continuous improvement and has no defined time horizon.

Network API roll-out project

Orange participates in the GSMA “Open Gateway” initiative, which targets open application programming interfaces (APIs) for developers to provide universal access to operators’ networks and thus offer customers new services and functionalities. These APIs could be particularly useful in combating fraud and online digital identity theft.

Orange also takes part in multi-operator work in Europe, under the aegis of the GSMA, whether by studying and discussing the legal framework for processing personal data from APIs, or by helping to develop explanatory documents for the different APIs.

The Orange Live Net business unit was established at the beginning of 2025 within Orange Innovation to market APIs while respecting personal data protection.

Expressing opinions to the public authorities

In terms of consumer protection, Orange engaged with French public decision-makers in 2025 to promote an end to unsolicited phone calls by supporting the implementation of the opt-in system, which in principle prohibits such calls without the prior express consent of the consumer.

4.3.5.2.6.2 Rolling out the cybersecurity program

Managing data security

Data security management relies on security stakeholders at all Group entities as well as on several Security Operations Centers (SOCs):

- the Group Security Operations Center (GSOC) detects security incidents across all shared property such as workstations, the messaging service and the Cloud;
- the CERT coordinates all the relationships with external entities (other CERTs, other operators, web hosts, social networks, suppliers, researchers, whistleblowers, etc.);
- incident detection also relies on close collaboration between the Group Security Department and Orange Cyberdefense.

The Group’s security stakeholders have access to a set of provisions that allow them to more effectively decide which measures to take to prevent threats, and even detect them more quickly, contain them and eradicate any that do occur: the Group’s policies and the Group Security Standard.

The Group security standard focuses on essential security requirements to be applied throughout the Group and includes a minimum of 144 rules to be implemented in three areas: information security, physical security and personal security in the face of country risks. In 2024, Orange revised its Group security standard and incorporated issues relating to vital and critical asset programs, incident reporting, awareness-raising and supervision of the company’s essential assets. This standard plays a role in monitoring the Group’s entities’ compliance with the NIS2 Directive. It includes an assessment model based on a year-round campaign, allowing entities to self-correct over time in order to more quickly ameliorate the identified weaknesses. Orange’s operational entities are asked to conduct an annual self-assessment based on the new standard. This new standard, which applied as of 2025, includes a process and governance component and an operational component.

In addition, through specific requirements in the Group’s security standard and its supplier cybersecurity management policy, Orange ensures that its suppliers are committed to data security: information security requirements, controls and preparations for managing supplier security incidents.

The SOCs regularly monitor deviations from security policies and alerts that may be triggered in the event of suspicious activity. Any such alerts are analyzed, and remediation procedures are monitored depending on the level of criticality.

Group’s critical and vital assets program

The program for monitoring vital and critical assets was launched in 2022 and has identified 194 components that have a Group impact in the event of business interruption. It is based on 41 checkpoints for each asset (e.g. SOC supervision, intrusion tests, risk analysis, etc.) and identifies a breach indicator for each scope, which is monitored continuously during the year. The program also makes it possible to implement specific action plans for certain assets, in order to reduce the risk. In 2025, the program was expanded to the vital and critical assets of the entities.

Internal cyber rating program

In addition, the internal cyber rating program was launched in 2022 for the Group as a whole. A cyber rating enables companies to quantify their exposure to cyber risk. The internal cyber rating takes the telecom operator’s specific characteristics into account, and the basis for its calculation is the scope of its own infrastructure.

The goal is to give each Group entity visibility on its attack surface, identify areas of improvement to reduce it and provide the resources to address these vulnerabilities.

Metrics have been put in place and targets are set each year.

Network and Information Security 2 Directive (NIS2) compliance program

As with any new regulation, Orange has anticipated the implementation of the European Network and Information Security 2 (NIS2) Directive. Starting in early 2024, a team reporting to the Group’s Head of IT and Network Security was set up to map the various components of the directive and take into account its transposition and the impacts for the Group.

In 2025, this team was responsible for the cross-functional coordination of the Group’s security community and, in particular, the heads of security, namely the Chief Information Security Officers (CISOs) and Chief Security Officers (CSOs). The aim of this coordination effort was to work with them to identify the impacts on their activities and anticipate the residual compliance work.

The Group Security Department supported the operationalization of NIS2 within the Orange entities that are outside of the EU and provide a service to entities located in the EU, and presented the progress made on the directive compliance program to the Executive Committee in September 2025.

Audits and certifications

To make sure that the information created, processed or stored by the Group is properly protected, Orange has put in place an intensive and ongoing audit program.

Orange regularly carries out technical, organizational, code-related and regulatory compliance audits as well as vulnerability scans on its infrastructure, prioritizing its critical and vital assets. Orange relies in particular on Orange Cyberdefense's recognized expertise in the market.

Orange has begun the process of obtaining certification for international standards, such as ISO 27001 and ISO 27005, for the scopes where this is necessary. In 2025, the Group held 52 security certifications: 24 ISO 27001 certifications for the security management system; 25 PCI DSS (Payment Card Industry Data Security Standard), HDS (Health Data Host) or SOC (Service Organization Controls) 1 or 2 security certifications; and 3 ISO 22301 certifications for business continuity. The 27001 certification scope may cover the information system; network management; customer data protection; or Data centers and the information system as is the case for Orange Polska; or network management and shared services in the case of Orange Slovensko.

In addition, the Group Security Department launched a quality certification process for a group of oversight activities and services to its internal clients. This culminated in obtaining ISO 9001 certification in 2025, which ensures the control over and reliability of certain Group security processes.

4.3.5.2.6.3 Raising awareness and training on personal data protection and cybersecurity

Personal data protection and cybersecurity affect everyone, which is why Orange makes awareness-raising and training on these subjects a priority.

The Cyber Ready program was launched in 2022 with the goal of developing a culture of security within the Group. It is based on a cybersecurity awareness visa, available in the Group's seven languages. This training, which has been a priority and mandatory for all Group employees every year since 2024, includes compliance with personal data protection. This target is taken into account in the annual variable compensation of Corporate Officers (see Section 4.1.2.3 *GOV-3 – Integration of sustainability-related performance in incentive schemes*).

In addition to this awareness program, Orange offers its employees a catalog of internal and external training courses so they can develop their security skills and practices.

For its service providers, Orange requires that their employees be aware of cybersecurity and trained based on their job.

4.3.5.2.7 S4-5 – Targets related to managing the material impact and risk concerning personal data protection and cybersecurity

Orange has not identified a target associated with impact and risk linked to personal data and cybersecurity and does not disclose metrics on the effectiveness and efficacy of its action plans in its 2025 sustainability statement.

4.3.5.3 Management of the IRO related to the health and well-being of users, including children

4.3.5.3.1 ESRS 2 SBM-3: IROs and their interaction with strategy and business model

In its double materiality analysis, Orange identified a negative material impact on the health and well-being of children and young people of excessive screen use and exposure to inappropriate content.

Orange has defined several user profiles that may be impacted more particularly, based on socio-demographic characteristics, environments and levels of familiarity with digital technology. However, according to UN definitions, children (up to 18 years old) and young people (between 15 and 24 years old) are particularly vulnerable to screen-related risks, such as the impact of social networks, information overload, lack of sleep and exposure to inappropriate content. The Convention on the Rights of the Child (1989), ratified by 197 countries, emphasizes fundamental principles such as non-discrimination and the right to development.

In 2012, UNICEF established ten principles to help businesses protect children, particularly in the digital environment. Orange is part of this initiative to establish the rights and well-being of children in the face of digital challenges. The Group believes that the use of its products and services generates a need for accurate and accessible information on their use, as children and young people are particularly exposed to impacts on their health, privacy or the impacts of marketing and sales strategies. These are systemic impacts related to the nature of the products and services that Orange markets.

4.3.5.3.2 S4-1 – Policies related to consumers and end-users linked to the health and well-being of users, including children

The management framework for the material negative impact related to excessive screen use and exposure to inappropriate content is based on two policies: the Group human rights policy and the policy on the rights and protection of children in the digital age.

4.3.5.3.2.1 Group human rights policy

The promotion of informed digital citizenship is a strong focus of Orange's human rights policy. It aims to bring out the digital rights and duties of each user, by educating about and raising awareness of good digital practices. It stresses that technology usage must respect the fundamental rights of people and contribute to their overall well-being, whether in terms of their physical or mental health.

Through its human rights policy (see Section 4.3.1.1 *Group human rights policy*), Orange encourages balanced use patterns and an understanding of the impacts of digital technology in order to limit potential health impacts, particularly those related to prolonged screen exposure, cognitive overload and the effects of dependence on digital services. The policy emphasizes the need to protect vulnerable people, including children, seniors and people with physical, mental or cognitive disabilities.

4.3.5.3.2.2 Policy on the rights and protection of children in the digital age

Orange's policy on the rights and protection of children in the digital age is a continuation of its human rights policy. By recognizing the specific rights of children and their vulnerability to the risks of digital technology, Orange recognizes that children, who are still developing, are more sensitive to the effects of prolonged screen exposure and age-inappropriate content, which justifies adapted protection measures.

Orange's policy on the rights and protection of children was revised in 2025 in order to strengthen its ambition and meet the new challenges identified. This update included:

- the strengthening of the fight against cyber harassment;
- awareness-raising among employees so that they themselves become involved in prevention and awareness-raising;
- the explicit integration of the fight against online child abuse.

These changes supplement and enhance the policy's five founding principles:

- Orange proposes and promotes the use of online activity protection tools. Orange thus provides systems, such as parental controls and screen time management based on the child's age. Since 2025, the Group has been strengthening the development of tools and partnerships to combat cyber harassment, mainly by providing support systems, creating safe spaces in digital environments and promoting and/or co-financing free victim support services, such as the free 3018 hotline in France;
- Orange gives parents, children, educational actors and its employees keys to understanding the digital world. Orange offers usage advice, workshops and educational resources. Since 2025, this approach has been expanded to include training for employees in all the Group's regions. In addition, Orange actively supports the fight against online child abuse by developing awareness-raising and prevention actions in conjunction with the competent authorities and specialized associations;
- Orange ensures that its commercial, marketing and communication strategy respects child protection rights. The Group refrains from targeting young children in its offers and communications, provides family-friendly services and applies strict guidelines for responsible communication;
- Orange is working to make digital technology a lever for equal opportunities. Orange introduces children to technologies with programs such as #SuperCoders, the workshops of the Cité des Télécoms foundation and the Orange Digital Center coding schools. The Group also works to increase the proportion of women in technical and digital professions and supports the education of disadvantaged young people, as well as the development of educational tools for children with autistic disorders;
- Orange ensures respect for the principles of the International Labor Organization and UNICEF's Children's Rights and Business Principles regarding child labor. Orange prohibits the use of child labor throughout its value chain and works to monitor its suppliers and partners in this regard.

The policy on the rights and protection of children in the digital age applies to the entire Orange scope, encompassing all its subsidiaries, in all geographical regions, and all its stakeholders.

It is supported and signed by the executive director in charge of CSR, who is responsible for its implementation.

Its management and roll-out in the Group's various entities are based on the Committee on the Rights and Protection of Children: it brings together Orange's managers responsible for the protection of children and CSR from all Group regions, as well as experts in public affairs, regulations, marketing and communication.

The policy on the rights and protection of children in the digital age complies with several frameworks, standards and reference initiatives: the International Convention on the Rights of the Child, UNICEF's "Children's Rights and Business Principles" guide to

helping businesses improve the well-being of children around the world, and the UN Global Compact supporting the fundamental rights of children.

It is available on the Orange website at www.orange.com⁽⁸⁰⁾.

4.3.5.3.3 S4-2 – Processes for engaging with consumers and end-users about impacts linked to the health and well-being of users, including children

In order to better understand the expectations and perceptions around digital technology and the protection of children, Orange has been engaging in stakeholder dialogues for several years.

In 2023, the Group organized a "Children and Digital" stakeholder dialogue in France, bringing together parents, children, experts, Orange employees and business representatives. In 2025, Orange internationalized and strengthened its engagement with children by participating in the "Listen Up!" project, a joint initiative with ESSEC Business School and the Global Child Forum. Eight focus groups were organized, four of which were arranged directly by Orange in France, Egypt, Romania and the Democratic Republic of the Congo, with ESSEC ensuring proper methodology. Each group brought together 8 to 15 children aged 13 to 15, using the theory of change methodology, which compares their daily needs with their digital uses.

The analysis of the qualitative results, carried out at the end of 2025, will serve as the basis for rolling out a questionnaire on a larger scale in 2026 and for deepening the lessons learned. Orange will also, starting in 2026, assess the effectiveness of these dialogues in order to concretely measure the influence children's participation has on its policies and practices – an essential condition for relevance, credibility and impact.

4.3.5.3.4 S4-3 – Processes to remediate the negative impact and channels for consumers and end-users to raise concerns linked to the health and well-being of users, including children

Hello Ethics is the Group's whistleblowing system for reporting ethical violations, including those related to the rights and protection of children. This system is detailed in Section 4.4.2.4 *Group whistleblowing system*.

4.3.5.3.5 S4-4 – Taking action on the material impact on consumers and end-users, and effectiveness of those actions linked to the health and well-being of users, including children

In order to ensure the monitoring and remediation of potentially negative impacts on the health and well-being of children and young people related to the excessive use of screens and exposure to inappropriate content, Orange has put in place five action plans described below.

Orange assesses the effectiveness and efficacy of its action plans to prevent or mitigate the negative impact identified through its Vigilance Plan (risk concerned: harm to the mental and physical health of young people due to negative uses of digital technology). However, Orange has not yet defined a Group process to assess the effectiveness of remediation measures in the event of a contribution to an actual negative impact, or a Group process to identify the actions necessary to address or remedy the material negative impact related to the health and well-being of users, including children.

(80) <https://gallery.orange.com/rse?lang=fr&od=57262536-6f8a-4461-8f19-dfd5df4d3c2f&om=caab836b-2f71-41f6-9736-ee14a77de852&v=24b1cc9d-f8ad-43e2-bbd0-bd1f75878d85>

Furthermore, Orange does not have a systematic process for identifying the resources associated with each action and discloses this information in part.

4.3.5.3.5.1 Offering protection and control tools for parents and children

Orange offers parental controls in several countries covering television, mobiles and computers, to protect children from inappropriate content and use. This refers to any online content that is not appropriate for the age, development or feelings of children and young people, and that may have a negative impact on their physical or mental health, safety or well-being.

On a television, the features include a PIN lock to block access to certain channels and programs (depending on age), restrictions on on-demand and replay TV and blocking purchases.

On mobile devices and computers, Orange offers in several countries inappropriate content filtering tools, limiting screen time, controlling apps, tracking online activity, geolocation of children and blocking unwanted communications. These options are generally accessible through a dedicated parental control app or online portal, providing parents with centralized and customized management of their children's digital uses.

Since 2024, several offers specific to the protection of children have been launched in Orange countries, as described in Section 4.3.5.6 *Management of the opportunity related to the role of trusted operator*.

4.3.5.3.5.2 Raising awareness, informing and training children, parents, educators and employees

Orange is rolling out a series of actions to raise awareness and support children, parents, educators and employees on the responsible and secure use of digital technology. These actions include setting up online resources with practical advice and tools for parents, available, for example, on subsidiaries' websites, such as the "Bien Vivre le Digital" website in France.

Orange also delivers educational programs in several countries to strengthen the digital maturity of young people and their understanding of risks such as cyberdependence and fake news online. In Poland, for example, the MegaMission program provides children with courses on digital citizenship and responsible screen use, while in Romania, the SuperCoders program raises awareness among young people about the basics of online safety and digital literacy. In France, a workshop program is offered in middle schools to promote positive and responsible digital practices and teach young people to critically evaluate online content. The "Déclic" (Click!) card game was designed by Orange with the help of the CEGOS training institute to teach children aged 10 to 15 the right digital habits: screen time, fake news, protection against cyber harassment, inappropriate content, privacy and frugal uses for the planet. The game is available in four languages and was rolled out in 19 Group countries in 2025.

In some regions, Orange also organizes face-to-face or online workshops for parents, in order to train them on the right behaviors to adopt to keep their children safe online. Orange Belgium and Orange Communications Luxembourg are also working with local associations to offer awareness-raising workshops, including on e-sports and cybersecurity, specifically tailored to young people who are vulnerable or who practice sports.

Orange also continued to pursue the #ForGoodConnections initiative⁽⁸¹⁾ in 2025 to promote a safer digital world. It is mainly aimed at parents, children and young people in countries where Orange operates. Presented on Orange's website at www.orange.com, it highlights Orange's actions to promote digital well-being and the protection of young people in the digital world. In all the Group's regions, Orange offers workshops to strengthen confidence and adopt good practices, in particular for cyber harassment, misuse and even data protection breaches.

In 2025, Orange's teams mobilized in 24 countries for the #ForGoodConnectionsDay initiative. Children and young people came together for sports days and fun-filled workshops to learn and adopt the right online and social media habits, and to understand the mechanisms of cyber harassment and screen overexposure and their consequences. More than 10,000 children attended.

An advertising campaign was launched in France during the summer of 2025 to confirm Orange's new brand positioning: *"Hold on as long as you can and, when you're ready, we'll be here to protect your children."* This promise is supported by concrete evidence: the Safer Phone, which provides access to parental controls, makes it possible to block unwanted calls and gives access to an anti-harassment solution (see Section 4.3.5.6 *Management of the opportunity related to the role of trusted operator*). The campaign was also made available on the Group's Intranet, in order to raise awareness among employees.

Orange partnered to produce the film *TKT (T'inquiète - "don't worry")* on bullying in school and cyber harassment. It was released in France in September 2025 in movie theaters after its initial release in Belgium last year. Orange and e-Enfance worked in partnership to organize discussions around the film and raised awareness of harassment and cyber harassment among more than 10,000 students across France. A digital support campaign was rolled out on orange.fr, through a mass email to customers, and on Orange's accounts on Instagram, TikTok and X. Thanks to a partnership with L'Étudiant, a dedicated email was sent to young parents and teachers. Several private screenings were held for Orange employees. The film *TKT* has also been shown in Slovakia since October 2025, with Orange Slovensko as partner.

These actions constitute a permanent process of continuous improvement and do not have a defined time horizon.

4.3.5.3.5.3 Contributing to the fight against online child abuse

The Group relies on partnerships with NGOs and professional organizations to establish effective mechanisms for reporting, detecting and moderating online child sexual abuse content.

Lastly, Orange asks its subsidiaries to provide means of reporting that can be accessed via their platforms, in accordance with local laws and European directives on the protection of minors online. These actions ensure that content distributed via Orange networks complies with the ethical and legal standards in force.

In France, a partnership was formed with Canopé, the training network for education professionals, and Office Mineurs, the police department that combats the most serious crimes, to raise awareness among teachers. Regular collaborations with the Fondation pour l'Enfance (Children's Foundation) also help support increased recognition of this problem. Finally, the "Bien Vivre le Digital" site constantly communicates awareness-raising messages to parents, in partnership with associations such as e-Enfance and Cameleon.

(81) <https://www.orange.com/en/our-impact/on-society/forgoodconnections>

This is a process of continuous improvement that has no defined time horizon.

4.3.5.3.5.4 Participate in sectoral initiatives and research bodies

Orange is a stakeholder in sectoral initiatives (member of the GSMA Mobile Alliance against the online sexual exploitation of children and a partner of the European Commission Alliance for the Protection of Minors Online since 2017) and thus contributes to the safer and rewarding use of digital technologies for young people worldwide. The aim of Orange's commitment to these sectoral alliances is to join forces with other players to develop common solutions and share tools and knowledge, thus increasing the impact of its actions to combat the sexual exploitation of minors.

In 2025, Orange joined other operators in the Africa Taskforce on Child Online Protection led by the GSMA and UNICEF. This initiative, launched as part of the Mobile World Congress in Kigali, aims to strengthen cooperation between governments, the private sector and civil society to protect children from digital risks.

Also in 2025, Orange joined the International Research-driven Alliance for AI Serving Every Child (IRAISE) coalition, co-founded by the Paris Peace Forum and everyone.ai, which was launched at the Paris AI Action Summit in February 2025. This multi-stakeholder collaboration platform brings together researchers and public and private organizations from around the world in order to integrate child protection functions from the design phase for services using AI.

In addition, Orange Innovation's forecasters and sociologists are conducting studies on mental health that are aligned with the #ForGoodConnections program. In 2025, the work on the effectiveness of virtual reality in treating addictions was completed and promoted (report, conference, one-day seminar, publications). Research on digital uses has also been undertaken, shedding light on the challenges of cyberdependence, screen overexposure and digital parenting, and has already been promoted in an initial article. Finally, the team is also developing related research on understanding the mechanisms of cyber harassment as well as fraud and personal protection, including the family environment. This work is expected to produce new findings in 2026.

This is a process of continuous improvement that has no defined time horizon.

4.3.5.3.5.5 Expressing opinions to public decision-makers

Orange's commitment to the rights and protection of children is strongly embodied by the Group's Chief Executive Officer, who took to social media in 2025 to defend children's rights with respect to pornography, school bullying and cyber harassment. She promoted the #ForGoodConnections initiative, which targets children, parents and young people.

In 2025, the Group Public Affairs Department engaged with the public authorities in France on the topic of protecting minors from the dangers of the Internet. Discussions focused in particular on the role of operators in providing parental control solutions, as well as on the age verification systems provided for by the law on securing and regulating the digital space (*loi visant à sécuriser et à réguler l'espace numérique* – SREN). The objective was to note that responsibility for implementing these systems and the associated framework should effectively lie with the most relevant stakeholders – publishers, websites, and services platforms offering this content. The meetings held as part of the roundtables organized by the ministries and Parliament helped highlight all the Group's actions in this area.

In 2025, Orange also participated in the European Commission's public consultation and call for contributions to develop a European action plan against cyberbullying.

4.3.5.3.6 S4-5 – Targets related to managing the material impact concerning the health and well-being of users, including children

In connection with the negative impact of excessive screen use and exposure to inappropriate content, Orange seeks to support its customers and users by offering at least one digital protection offer for children in each of the countries where it is an operator (see Section 4.3.5.6.3 *S4-5 – Targets related to managing the opportunity as a trusted operator*). This target is monitored to ensure that progress is made on the offers available to customers in the countries. The reporting corresponding to this target will be carried out from 2026.

4.3.5.4 Management of IROs related to continuity of service

4.3.5.4.1 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

The increase in the number of climate disasters and malicious acts, in addition to an uncertain global geopolitical context, means that network degradation and disruptions could potentially become more frequent for users. These may be planned, for example for scheduled work, but are most often unplanned and result from climate disasters, technical malfunctions, malicious acts (hacking, equipment theft) or government requests.

In its double materiality analysis, Orange therefore identified:

- a negative impact resulting from network degradations and disruptions: all of its customers are likely to be affected by this negative impact, as their access to the network may be impaired. In the event of localized network degradations or disruptions, some customers may be directly impacted and, in the event of widespread disruptions or climate disasters, the whole of society (customers, citizens, emergency services, businesses, institutions) may be temporarily denied access to the network. In the event of a major crisis involving other actors, including electricity suppliers, emergency and healthcare services may not operate properly, with consequences for vulnerable individuals or those in emergency situations. This is an impact related to isolated and non-systemic incidents;
- a reputational and financial risk related to network degradations or disruptions: this risk arises from the negative impact resulting from network degradations or disruptions. Recovery times, the availability of temporary solutions and the quality of communication help limit this risk.

Orange is aware that the network is essential to everyone's life and makes every effort to act as quickly as possible to restore users' access to the network, provide solutions for temporary network access if necessary and communicate clearly and transparently about the situation and recovery times.

Government requests are subject to a specific process. Internal security and state protection (cyber defense) reasons or tax transparency reasons may, at the request of the authorities, resulting in the interruption of activities, in the interception of communications, or in permission to access customer data. These events can be amplified due to a country's electoral context. In the absence of documented requests, such requests pose a risk of impeding freedom of expression and a risk to personal safety.

Orange, through its vigilance approach, identifies the risks involved in respecting human rights, particularly the risks related to freedom of expression. This assessment is conducted in the countries where the Group operates and is based on the analyses of the consulting firm Verisk Maplecroft (see Section 4.3.1.5 *Severe human rights incidents at the Group*).

4.3.5.4.2 S4-1 – Policies related to consumers and end-users linked to continuity of service

The framework for managing the material impact and the material reputational risk or risk of loss of business related to network degradations or disruptions is based on the business continuity policy, the crisis management policy and the human rights policy.

4.3.5.4.2.1 Business continuity and crisis management policies

Within the Group security policy, a particular focus is placed on business continuity management and crisis management, the goals of which are to prepare Orange for the impacts of realized risks and to document continuity and crisis management plans. The Group Security Department is responsible for rolling out the security policy (see Section 4.3.5.2.3.1 *Group security policy*).

With the proliferation of climate crises and malicious acts, Orange has strengthened its business continuity management and crisis management systems in recent years in order to improve responsiveness and effectiveness.

Orange makes these policies available internally for employees within the Group.

Business continuity policy

The business continuity policy sets out the following principles:

- identify essential activities, with confirmation from General Management;
- identify essential assets (sites, network components, IT applications, employees, in particular);
- conduct a business impact analysis (BIA) to determine business continuity and disaster recovery requirements after a disruption;
- develop continuity solutions, including business continuity plans (BCPs), disaster recovery plans (DRPs) and other back-up site activation plans and crisis management plans;
- test the drills and plans related to the recovery plans.

All of each entity's business areas are eligible for business continuity. However, an entity can prioritize a group of essential activities, namely activities related to Orange's core business (provision of telecommunication services and products and Mobile Financial Services, network and IT management, sales and after-sales customer relations), as well as essential support activities (including finance, human resource management, physical and data security, supplier management, and legal support).

Business continuity management is based on the risk mapping and the decisions on how to address these risks made by the business line managers, with support from the Risk Manager. A business continuity management expert provides methodological support to help the business divisions with operational implementation.

ISO 22301 applies to business continuity management. Neither the telecom regulator nor the authorities require certification. However, Orange Belgium and Orange Polska are ISO 22301-certified. The European Critical Entities Resilience and Network and Information

Security 2 directives are applicable to telecommunication operators. Thus, the business continuity management policy was updated in 2025 to take these directives into account, and the associated requirements are set out in the security standard applicable to all Group entities.

Crisis management policy

The crisis management policy sets out the following principles:

- define the crisis levels and the various phases of a crisis (from warning to classification, mobilization and management until the crisis is over);
- organize the crises for the entire phase of a crisis;
- organize crisis management between the Group and the entities;
- test the crisis drills and plans.

All Orange entities must comply with the policy by implementing crisis management plans and procedures.

The crisis management policy was reworked in 2025 ahead of an update in early 2026 to capitalize on the experience gained during the 2024 Paris Olympic and Paralympic Games and to strengthen the Group's overall system.

4.3.5.4.2.2 Human rights policy

In the human rights group policy, Orange reiterates its commitment to protecting the data and digital identity of its customers and users and not restricting their right to privacy and freedom of expression. This policy is described in Section 4.3.1.1 *Human rights group policy*.

Moreover, it is one of Orange's principles to prioritize staff safety in all circumstances. To this end, the Group relies on the principles of the Global Network Initiative (GNI) to which it adheres, as well as the Group security policy, one of whose objectives is to protect people, in particular employees. This policy is described in Section 4.3.5.2.3.1 *Group security policy*.

4.3.5.4.3 S4-2 – Processes for engaging with consumers and end-users about impacts linked to continuity of service

The development of the business continuity and crisis management policies, based on continuous improvement, relies on the feedback and expectations of internal and external stakeholders.

Consumer and end-user perspectives inform the systems put in place to address network degradations and disruptions. The "Responsible together in a post-covid digital world" stakeholder dialogue conducted in 2022 (see Section 4.1.3.2 *SBM-2 – Interests and views of stakeholders*) highlighted how important it is for people to be able to access essential services in the event of a crisis (healthcare, education, public services, etc.), especially in rural areas, and therefore how important it is to ensure continuity of service. The dialogue conducted in 2025 on "the role of digital technology and networks in tomorrow's society" emphasized the need for resilience and the importance of anticipating and managing crises.

The "Let's talk about the duty of vigilance" stakeholder dialogue had highlighted the effects on freedom of expression of disruptions at the request of government.

Customer feedback through the various reporting channels during major incidents (see Section 4.3.5.4.4 *S4-3 – Processes to remediate the negative impact and channels to inform consumers and end-users linked to continuity of service*) informs the business continuity and crisis management policies and actions.

4.3.5.4.4 S4-3 – Processes to remediate the negative impact and channels to inform consumers and end-users linked to continuity of service

4.3.5.4.4.1 Remediation process

Orange has developed a process for managing network degradations or disruptions; this covers relations with the affected users and customers and, depending on the situation, the relevant authorities, as well as correction and improvement methods. This process is defined for each entity or country.

Orange communicates with its customers and the affected users through its customer relations channels, as detailed in Section 4.3.5.5.3 *S4-3 Processes to remediate negative impacts and channels for consumers and end-users to raise concerns linked to responsible marketing and information practices*. Orange has chosen a proactive and customized information policy for its affected users. In the event of network degradation or disruption, Orange informs the affected users as soon as possible through its customer relations channels and keeps them informed of how the situation is developing. For example, Orange France personally informs its BtoC customers, when relevant, either through a direct channel (text or email), or through public channels: messages posted on Orange's social media accounts, Orange TV, the orange.com portal, the Orange & Moi mobile app or through a press release. In France, customer service at 3900 is also informed of the messaging. Users are thus made aware of the causes of the incident, and are informed in real time of the recovery date.

Customers and users can also make reports and interact with Orange through the various customer relations channels.

As well as providing information, Orange supports its customers based on the type and level of impact. Depending on its customer's situation and needs, Orange endeavors to offer temporary alternative solutions. Also, Orange France automatically offers continuity of service solutions to minimize the inconvenience, whether or not the disruption is caused by Orange: loaner phone provided for 30 days at a store upon request, 200 GB of data offered for free on a mobile phone with a plan from Orange or another service provider, or loaner 4G airbox.

4.3.5.4.4.2 Whistleblowing channels

To report a network degradation or disruption to Orange, end-users have access to the customer relations channels that they usually use with Orange, as described in Section 4.3.5.5.3 *S4-3 Processes to remediate negative impacts and channels for consumers and end-users to raise concerns linked to responsible marketing and information practices*. These resources vary by market – BtoC, BtoB, operators – or even by market segment; a small business does not have the same channels as an international key account. For BtoC, the reporting channels include customer service and digital channels. BtoB customers can make reports using their segment-specific channels.

4.3.5.4.5 S4-4 – Taking action on the material impact and risk related to consumers and end-users, and effectiveness of those actions linked to continuity of service

To make sure its users have access to the network, Orange takes steps to avoid or minimize the impact of network degradations and disruptions, whatever the cause.

In the event of such an incident, Orange takes action to ensure continuity of service for users and to make repairs in order to restore service as quickly as possible. It also rolls out temporary connectivity solutions so that, from the first hours of a major crisis, relief operations can be carried out and the services that are essential to communities can be restored.

At the same time, anticipation and prevention programs are rolled out to improve awareness and organization should an incident occur.

Government requests are considered on a case-by-case basis.

Orange assesses the effectiveness and efficacy of its action plans to prevent and mitigate the negative impact identified through its Vigilance Plan (risks concerned: restrictions on freedom of expression, dangers to health and safety due to a failure of sensitive services, crisis resulting from a sudden exogenous event).

Furthermore, Orange does not have a systematic process for identifying the resources associated with each action and discloses this information in part.

4.3.5.4.5.1 Rolling out business continuity management and crisis management policies

To address the negative impact of network degradations and disruptions, Orange is rolling out its business continuity plans in each of its entities in accordance with its Group policy specified above and, for certified entities, in accordance with ISO/IEC 22301.

Action plans have been defined and implemented in the entities based on the types of incidents. The incidents can take many forms: bad weather or climate disaster, fire, theft of cables or equipment, malicious acts or cyber attacks, government requests, geopolitical conflicts, etc. Also, the severity of the incident depends on the number of people or services affected and/or the geographic scale.

Some network disruptions can be avoided by using an activated redundancy or an early emergency system. When network access is affected, the rapid restoration of networks and services takes priority during the initial hours, days, or weeks, in order to enable the public authorities, as well as other essential operators, NGOs and associations, to coordinate relief efforts and restore essential services.

In the event of a major crisis involving third-party and other infrastructure, Orange rolls out so-called temporary connectivity solutions in the very first hours. These solutions, such as the SafetyCase, were rolled out during the crisis in Mayotte (Cyclone Chido in December 2024) to provide emergency telecommunications (see Section 4.2.2.4.4 *Offering services to face extreme weather events*).

In addition, Orange has discussions with the authorities and the operator in charge of electricity distribution, in France for example, as part of the prevention of climate-related hazards or potential load shedding in the electrical system and during remediation as a result of climate-related hazards that affect both telecommunication and energy infrastructure.

The Group measures its performance trends by the coverage rate of these plans. They may relate to the restoration of the fixed access network as a result of bad weather, the restoration of mobile sites or infrastructure affecting a larger number of customers.

In 2025, in an effort to continuously improve its efficiency and as a response to hybrid crises (cyber, geopolitical, climate-related, etc.), the Group strengthened its system with the creation of a Group crisis management coordination office.

All these actions constitute a process of continuous improvement and have no defined time horizon.

4.3.5.4.5.2 Better anticipating crises

In 2025, Orange launched the Orange Sentinelle program, which aims to strengthen the ability to anticipate cross-cutting crises at the Group level by:

- collectively analyzing a security issue in advance (all types combined);
- identifying the impacts on the Group: Group reputation/image, people and assets, including networks;
- identifying the associated remediation actions.

Through this program, Orange increases its ability to anticipate successive disruptions by focusing on a global and cross-cutting analysis of risks or threats and on a proactive approach to strengthen the Group's resilience.

4.3.5.4.5.3 Adapting to climate change

In parallel with these actions, Orange is working on a plan to adapt its infrastructure to climate change, in order to make its networks more robust and resilient. This plan is detailed in Section 4.2.2.2.3 *E1-3 – Actions and resources related to policies associated with the impacts and risks related to climate change adaptation.*

4.3.5.4.5.4 Responding to government injunctions

Compliance with the Global Network Initiative principles

The Global Network Initiative (GNI) is a multi-stakeholder platform that works to ensure the respect of freedom of expression and of the right to privacy in the technology sector, taking into account a constantly evolving geopolitical, technological, political and regulatory context. The implementation of Orange's commitment to promote freedom of expression and to respect privacy in the performance of its activities as a telecommunication operator has been guided by its membership of the GNI since 2017 and by being on its Board of Directors.

The GNI is fully transparent in its activities and is registered on the transparency register with the European Commission, the Council of Europe and its Commissioner for Human Rights, the United Nations through special mandates, the Counter-Terrorism Committee, the Office of the United Nations High Commissioner for Human Rights (OHCHR), UNESCO and the GSMA. In response to government requests for access to user data, restriction of communications or deletion of content, it provides principles and guidelines to promote a responsible framework for freedom of expression and privacy. Orange promotes these principles in all the Group's regions:

- respect and work to protect users' freedom of expression by seeking to avoid or minimize the impact of government restrictions on freedom of expression;
- respect and work to protect the privacy rights of users subject to government requirements, laws and regulations that may compromise privacy in a manner inconsistent with internationally recognized laws and standards;
- identify circumstances where freedom of expression and privacy may be either compromised or promoted and, in such circumstances, integrate these Guiding Principles into decision-making;
- give precedence to employee safety over the previous principles.

The GNI participates, alongside government bodies, protection authorities and economic actors, in events and discussions promoting the protection of digital rights in an increasingly digital world.

Working groups, the organization of an Annual Learning Forum, the sharing of use cases and the GNI's position statements on defending and promoting human rights, as well as the monitoring that it makes available to its members, allow Orange to ensure continuous understanding by internal actors of developments in this field.

Every two years, the GNI assesses the degree of implementation of the principles by its members. The aim of the assessment is to enable the GNI's Board of Directors to determine whether each member company is making good faith efforts to implement its principles as part of a continuous improvement approach. The independent assessment includes both an examination of the company's processes (systems, policies and procedures) and a review of specific case studies. The findings of the assessment are published in the GNI Public Assessment Report. The next assessment for Orange was initiated at the end of 2025 and will be published in 2026. It will be the third such assessment.

Qualification of requests from governments

Orange may receive several requests from the authorities, which may differ depending on the issuing authority and the country, and which may be made simultaneously: throttling, limiting access to certain social networks and interrupting various categories of telecommunication services, access to user data.

In each country where it operates, the Group has put in place a mechanism applicable to each event resulting from a government request in order to ensure that the request is justified in compliance with local and international laws. In addition, Orange expresses a judgment on the proportionality of the request and ensures that it is documented.

In order for such requests to be implemented by Orange, they must fulfill a formal requirement based on three elements: the competence of the authority to which the request is made, the formalization of the request, and the legal basis, the regulations in force in the country. After verification of these elements, the request is either carried out, rejected or returned, in order to obtain missing information for its analysis.

In order to fully exercise its power to oppose any unjustified request to interrupt service or requisition data, Orange also verifies the latest legal provisions allowing the authorities to request network cuts, service reductions or communication interceptions, particularly before elections are held.

Orange also complies with administrative and judicial requests for the removal of illegal content. Orange complies with the legislation in force in the countries in which the Group operates and acts in response to requests from governments concerning specific cases covered by the local legal framework and in accordance with the Group's various human rights commitments. In most cases, these requests relate to content restriction, and Orange blocks a website or an IP address. As a telecommunication operator, Orange does not examine online content and cannot block specific content, only an entire domain.

Orange refers to the GNI and escalates requests that are processed collectively, anonymizing the information source.

This action plan is a process of continuous improvement and has no defined time horizon.

Pre-crisis units during elections

In the Africa & Middle East region, the Group has set up pre-crisis units, activated and coordinated jointly by the Security and Business Continuity Departments for the region, before elections and until the results are announced. With the involvement of the subsidiaries concerned and the support of the Group Security Department, the pre-crisis units verify the implementation of procedures enabling Orange employees or persons acting on behalf of Orange to continue their essential activities in complete safety.

Awareness-raising

In April 2025, the department responsible for human rights and the Legal, Regulatory and Compliance Department for the Africa & Middle East region spoke on the Africa learning call organized by the GNI on Internet disruptions and surveillance in Africa, highlighting the actions of the GNI in these cases and the need to opt for multi-stakeholder grouped responses.

In May 2025, the Legal, Regulatory and Compliance Department for the Africa & Middle East region organized an awareness-raising session for its teams given by the GSMA on the topic of requests for Internet suspension by national authorities. In November 2025, presentations were given to the Executive Committee and the GCSERC to report on the department's annual human rights review and focus on issues of freedom of expression and privacy.

These actions constitute a permanent process of continuous improvement and do not have a defined time horizon.

4.3.5.4.6 S4-5 – Targets related to managing the material impact and risk concerning continuity of service

Orange has not defined a target related to the negative impact and the reputational risk or risk of loss of business due to network access and does not disclose metrics on the effectiveness and efficacy of its action plans in its 2025 sustainability statement.

4.3.5.5 Management of the IRO related to responsible marketing and information practices

4.3.5.5.1 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

Orange identified, during its double-materiality analysis, a material reputational risk and risk of loss of customers in the event of a lack of transparency of offers and services.

Orange serves consumers (BtoC) and businesses (BtoB). For the BtoC market, the Customer eXperience and Operations (CXO) Department is responsible for the strategy for and oversight of the customer experience for all Group regions, in collaboration with the local entities and other divisions. For the BtoB market, the customer experience is managed by Orange Business, in coordination with the CXO. Orange organizes annual reviews to assess the customer experience in each country. These reviews involve discussions between the CXO Department and local management to share the Group's vision and identify improvement solutions. They rely on data and benchmarks to make recommendations for action. Recommendations are followed up on at quarterly meetings to manage the action plans. The CXO Department analyzes the entities' positioning on the different dimensions of the customer experience and shares best practices among Customer Experience Directors.

4.3.5.5.2 S4-1 – Policies related to consumers and end-users linked to responsible marketing and information practices

The management framework for the material risk to reputation and of loss of customers in the event of a lack of transparency of offers is based on four policies: the Responsible Communication Code, the Group's principles regarding environmental claims, the Data and Artificial Intelligence Ethics Charter and the customer experience policy.

4.3.5.5.2.1 Responsible Communication Code

Orange has created a Responsible Communication Code that applies to all Group subsidiaries and in particular to the communication, marketing and customer relations teams in the broad sense.

The Responsible Communication Code aims to prevent acts of communication that do not reflect the values of respect and transparency. The information disseminated must be respectful, avoiding stereotypes and discrimination, representative of the diversity of the public, accessible through multiple channels and for people with disabilities, and adapted to the cultures of the countries where Orange operates. The information must also be transparent and simple, and the offers and rates must be presented in a clear and legible manner. Misleading or ambiguous terms and willful omissions must be excluded. In a world that is constantly changing, these rules of communication form a basis for supporting Orange's social, societal and environmental commitments. The Responsible Communication Code is available in the CSR media library on Orange's website at www.orange.com.

4.3.5.5.2.2 Group principles regarding environmental claims

In order to ensure the transparency and reliability of the environmental information communicated on products, the marketing teams can refer to rules defined by the Group's CSR Department: the seven principles of environmental claims (see Section 4.2.2.2.1.1 *Environment and energy policy and guidelines*).

4.3.5.5.2.3 Data and Artificial Intelligence Ethics Charter

Orange has placed the use of data and artificial intelligence (AI) at the center of its innovation strategy, in order to reinvent the customer experience, improve the quality of its decision-making and increase operational efficiency. To create sustainable value and strengthen confidence in AI, the Group ensures that the ethical, social and environmental issues specific to AI are integrated throughout the life cycle.

In March 2021, Orange created a Data and AI Ethics Council made up of 11 external individuals, selected for their independence, neutrality, expertise and diverse profiles. This Council has developed an ethics charter that embodies Orange's values and aims to ensure that the development of AI within the Group and its value chain respects an ethical and trusted framework, in line with Orange's purpose (see Section 2.1.3.5 *Ethics and compliance*). This framework, which is based on European and international recommendations relating to ethics and goes beyond regulatory obligations, is also mentioned in the Group's human rights policy (see Section 4.3.1.1 *Group human rights policy*). The charter was approved by the Executive Committee in 2022 and is available at www.orange.com.

As an example, one of the principles of this charter requires that Orange communicate in a transparent and intelligible way on the functioning of the AI solutions used and that it establish a clear chain of responsibility for its customers. The company fulfills its commitments and has, for example, verified that its Live Intelligence solution for businesses, which leverages generative AI systems to optimize customers' operational efficiency, complies with this charter.

The implementation of the principles of the Data and Artificial Intelligence Ethics Charter is monitored by the data and AI ethics committees in the main business units, as well as by the Data and AI Ethics Council, which also analyzes the use cases and ethical issues that are submitted to it, and issues advisory opinions to the Executive Committee.

To roll out the charter, a specific governance structure was established, overseen by the secretariat of the Ethics Council. It relies on tools, an AI ethics training program, dedicated processes and a community of ethics experts in the divisions and countries.

This governance structure aims to ensure that the charter is taken into account across all activities, to monitor the effectiveness of actions, and to capitalize on and share best practices, including through internal and external task forces such as Impact AI.

Among the recent initiatives, Orange has launched a questionnaire to assess the environmental and social risks associated with AI projects, in order to make concrete improvements to its practices. The ethical and sustainable approach also extends to the management of AI suppliers, with an ethics assessment and specific contractual clauses in place since 2025.

Finally, this governance structure allowed Orange to anticipate application of the European AI regulation. In September 2024, the company signed the AI Pact, which encourages companies to define a governance strategy, map AI systems and risks and raise employee awareness for responsible technology development. The monitoring of this governance structure and of implementation of the charter is presented to the Data and AI Ethics Council every six months.

4.3.5.5.2.4 The Group's customer experience strategy

Orange strives to offer the best service to its customers by being attentive to them, anticipating their expectations and acting quickly. This strategy is based on clear, transparent and adapted offers, with a quality of service that meets the needs of users and high-quality customer relations. This is a key differentiator for Orange, combining digital and physical channels to ensure smooth interaction in all the Group's geographical regions.

Orange's customer experience (CX) strategy aims to improve customer perception of value for money, while increasing the quality of the customer experience.

The overall objectives of the strategy are based on three strategic pillars: embodying the brand value proposition; improving the quality of the customer experience; and improving the digital user experience. In particular, it addresses two themes that aim to minimize the risk to reputation and of loss of customers in the event of a lack of transparency of offers:

- simplifying offers: this is a key lever in Orange's CX strategy. The objective is to provide offers that are natively designed to be offered digitally (online, in apps, etc.) and that are therefore necessarily few and easy to choose, subscribe to and manage. The "simple and easy to deal with" and customer journey satisfaction metrics can be used to pursue this goal;
- transparency is another fundamental aspect of the CX strategy. Orange is committed to ensuring transparency of invoices and avoiding hidden charges. This includes clear policies regarding fees and services, so that customers have an accurate view of what they have subscribed to and what they are paying for. Orange also relies on communicating clearly and regularly on prices, the terms and conditions of offers and any changes.

Customer satisfaction related to transparency and trust in offers is monitored at the level of the Europe region and the Africa & Middle East region by sampling. Customer feedback on the clarity of the information provided helps to adjust practices.

The scope of the strategy includes all Orange BtoC activities in all geographical areas. It applies to all aspects of the customer experience, including experience with offers and networks, customer contacts (online, in apps, in stores, in call centers, etc.), the smoothness of the experience (simplicity, speed) and social and environmental responsibility.

It was co-written and approved with all the Group's customer experience directors and regional directors (Europe, Africa & Middle East), based on customer expectations collected in numerous surveys, on the competition and the context of the markets of the Group's regions and subsidiaries. Its operational implementation is under the responsibility of the Customer Experience Director of each subsidiary. This strategy is also very widely shared within the Group (regions, Strategy Department, etc.).

The Customer Experience & Operations (CXO) Department implements programs aimed at supporting subsidiaries in its operational roll-out, for example the digital acceleration program, customer experience reviews and signature moments (identification of the moments that matter most to customers and where Orange can offer a differentiating experience).

4.3.5.5.3 S4-3 – Processes to remediate negative impacts and channels for consumers and end-users to raise concerns linked to responsible marketing and information practices

4.3.5.5.3.1 Customer Relations management

Customer relations are a major pillar of the Orange customer experience. The Group is aware of the impact of its interactions on customer satisfaction and trust and has implemented procedures to identify, prevent and remedy the negative impacts that may arise in customer relations. In the event of an incident or a concern expressed by a customer, tracking and resolution mechanisms are activated to ensure timely and appropriate support.

The strategy is based on an omnichannel approach integrating advanced digital tools, enhanced by artificial intelligence (AI). AI plays a key role in transforming customer relations, with the roll-out of priority use cases such as text and voice bots. Available 24/7 in all countries, they provide continuous and efficient handling of customer inquiries. They represent a third of chats with Orange. Their level of maturity varies based on how long they have been in use: they are able to support up to 60% of all reasons for contact, depending on the country, and they achieve up to 70% customer satisfaction and up to 75% of requests processed, depending on the country. Any interaction initiated with a bot systematically includes the ability to contact a customer advisor. Complex or sensitive cases are transferred by default to advisors with the right skills.

AI is rolled out within a strict framework to make it possible to assess the risks, train the technology on relevant and compliant data, continuously monitor quality, limit sensitive uses and ensure human supervision. Orange monitors technical robustness and security, data privacy and governance, and ethical and environmental aspects. Potential performances and biases are monitored and corrective measures are taken continuously.

Another use case is that AI tools are also used to help customer advisors with information searches and data analysis and synthesis, as well as with analyses of interactions in order to continuously improve the contact centers. These tools allow for a more seamless, faster and more customized customer experience, while also reducing operating costs.

4.3.5.5.3.2 Interaction channels

For BtoC customers, interaction channels include customer services that can be reached by phone, chat or messaging, digital channels (Orange website, *My Orange* app, Orange bots, social media), stores and home installation. Orange aims to increase the use of digital channels for simple and fully autonomous approaches, while offering human support for more complex cases. Customer services are mostly outsourced, with annual reviews to assess partner performance (see Section 4.3.3.2.4.2 *Assessing and auditing suppliers on topics relating to respect for the human rights of workers*).

BtoB customers are managed differently. They benefit from specific channels adapted to their segment (sole proprietorships and SMEs, key accounts). The smallest of them are managed via the platforms, but with customized treatment. SMEs, and especially key accounts, have at their disposal a customized digital customer area from which they can manage their contracts, invoices and portfolio (mobile phone and fixed line fleets, IT and network solutions). Key accounts customers are supported on a daily basis by a team whose role is to provide a permanent presence and listen to their customers, in order to understand their needs and to ensure that Orange is able to meet them. In some cases, the contract provides for an adaptation of after-sales processes, and Orange Business offers paid services that strengthen Customer Relations and customize the monitoring and implementation of its contracts through dedicated resources.

4.3.5.5.3.3 Complaint management

Orange offers customers the option to make a complaint via a variety of channels (customer service, stores, *My Orange* app, website). For over 10 years, Orange has been working to steadily reduce the root causes of customer service complaints.

The reasons for customer contact and complaints are tracked and monitored on a quarterly basis for each subsidiary. Work is then carried out with each country to identify the causes of complaints and prevent their recurrence. For example, if a complaint regards a misunderstanding on a bill, Orange works to improve its readability and communication. Capitalizing on and sharing country's best practices help to nurture and facilitate the necessary changes.

In France, in addition to the complaint procedures that are subject to internal follow-up, customers can refer the matter to the electronic communications mediator (independent third party), whose mission is to help the parties to reach an agreement.

4.3.5.5.4 S4-4 – Taking action to manage the material risk related to consumers and end-users, and effectiveness of those actions linked to responsible marketing and information practices

To develop its offers and market them responsibly, in order to prevent risk to its reputation and to increase customer loyalty, Orange has implemented the following action plans. These action plans constitute a process of continuous improvement and have no defined time horizon.

Orange does not have a systematic process for identifying the resources associated with each action and discloses this information in part.

4.3.5.5.4.1 Designing new offers

Throughout the Group, the design of offers is subject to a "Time To Market" (TTM) process, which includes approval milestones with various committees. The aim is to ensure that the future offer meets the criteria of relevance for customers, consistency with the rest of the product line and portfolio, and economic viability, from the first business plan of the product manager to placement on the market. The alignment of the offer with the entity's CSR strategy and conformance with the lines of conduct it has set itself are also verified.

In France, an enhanced process has been set up for the launch of new so-called complex products. From design to marketing, the product or service is tested with customers and improved based on their feedback. This system makes it possible to test whether the product and customer experience are properly understood, correct any malfunctions and achieve a satisfactory level of excellence for a commercial launch. In 2025, the launch of the *Livebox 7* benefited from this method.

When marketing new offers, the French marketing teams create information for the sales media, commercial websites and communication actions. When producing this content, they take into account the guidelines set out in the Responsible Communication Code or in the seven principles of environmental claims. In all cases, these sales and communication media are subject to managerial and legal approval to ensure that the information communicated is clear and transparent.

For BtoB customers, when Orange is unable to respond to the calls for tender of its key accounts customers with standard solutions, Orange Business launches a pre-sales project to build a tailor-made solution that will meet the customer's needs as closely as possible. These tailor-made offers are based on standard offers that are adapted and customized, or even on dedicated offers, to meet the customer's specifications, and are formalized. For several years, Orange has also been implementing a contract management guide for the marketing teams. The aim is to ensure that customers have clear contracts that are consistent from one offer to another and up to date.

4.3.5.5.4.2 Increasing the transparency of offers and information in the Africa & Middle East region

To address one of the region's strategic priorities, which is to ensure excellence in customer relations and protect the brand's reputation, in 2024 the Data, AI and Customer Experience Marketing department for the Africa & Middle East region launched a transparency program applicable to all countries.

This program, based on a set of golden rules for the universe of content offers and services, aims to harmonize and strengthen practices, with an emphasis on simplicity, the clarity of the customer experience and communication, while also ensuring ethical business practices and a better understanding for customers. Simplified customer experiences have been rolled out to improve content management, purchasing, consumption tracking and invoicing. On the content side, some collaborations with suppliers that offered complex and non-transparent experiences have been terminated, to ensure customer trust and the credibility of the offers.

Changes are measured with an annual questionnaire sent to country management. In 2024 and 2025, Senegal, Guinea Conakry, Guinea-Bissau and Tunisia in particular made significant progress, thanks to the review of the Pay As You Go Data service, which makes it possible to offer a reasonable and competitive rate for data overages while reducing the number of complaints to customer services.

In addition to regular monitoring with the countries to ensure the roll-out and continuity of the golden rules, best practices are shared between countries in a continuous improvement process, to promote collective upskilling and the efficient dissemination of successful initiatives.

This program was extended in 2025 to fixed telephony and home Internet offers, in order to ensure overall consistency and offer a more transparent and uniform customer experience for all services.

4.3.5.5.4.3 Increasing the transparency of mobile offers abroad

The marketing of mobile roaming offers aims to ensure that customers have fair and transparent access to mobile services abroad. In all the countries where the Group operates, Orange is committed to meeting the real needs of customers while encouraging them to manage their use of their plan.

Outside the European Union, Orange has launched a plan to eliminate excessive fees in key destinations. The offers are designed to be flexible, accessible and adapted to different user profiles. This program helps to combat the high costs often associated with the use of the Internet abroad and thus eases travelers' stress.

This responsible approach is reflected in a large number of mobile Internet offers, which can be activated automatically upon first use, are offered at affordable rates for short uses and may be supplemented by passes suitable for longer stays. In addition, the provision of simple digital tools and text alerts allows customers to track and manage their consumption in real time, thereby increasing transparency and cost control.

The offers launched by Orange Polska in 2024 illustrate this positioning, with an offer valid for 24 hours that is billed only when used, and a generous 15-day offer at an affordable rate. Similarly, Orange Maroc launched 7- or 15-day offers in 2025 for travelers to France or Spain, which are the two most popular destinations for customers.

These initiatives illustrate Orange's commitment to promoting responsible roaming that combines accessibility, transparency and consideration of customers' expectations.

4.3.5.5.4.4 Achieving a standard of operational excellence

Orange has chosen to establish operational excellence in customer relations and improve the customer experience by using the international COPC CX standard in all channels (customer service, digital channels and chatbots, stores). The COPC CX standard is a worldwide benchmark standard for managing and steering customer relations, focused on operational excellence. It helps improve customer satisfaction and monitor service quality. This standard addresses all aspects of a customer-centric operation, – from metrics and solid processes to the right people and the right skills and knowledge to get the job done – while actively listening to the customer at every stage.

This approach also ensures common language for Orange subsidiaries. Also used by other major brands around the world, it gives Orange access to the best practices and high-performance benchmarks.

Orange began its performance management program using the COPC standard in 2011, with the first country certifications taking place in 2013. Since then and through 2024, 12 countries have been certified. Côte d'Ivoire and Mali were certified in 2025, while several countries underwent audits and received support to make improvements, and some were recertified: Poland, Senegal and Jordan.

4.3.5.5.5 S4-5 – Targets related to managing the material risk concerning responsible marketing and information practices

Orange does not disclose a target related to the reputational risk and risk of loss of business due to a lack of offer transparency, and does not disclose metrics on the effectiveness and efficacy of its action plans in its 2025 sustainability statement.

4.3.5.6 Management of the opportunity related to the role of trusted operator

In its double materiality analysis, Orange identified a market opportunity to meet the growing security and trust needs of digital life for its customers. This opportunity concerns all its markets: BtoB, BtoC and operators.

4.3.5.6.1 S4-1 Policies related to consumers and end-users linked to the opportunity as a trusted operator

The action plan detailed below on the role of trusted operator does not rely on any particular Group policy.

4.3.5.6.2 S4-4 – Taking action to pursue the material opportunity related to consumers and end-users, and effectiveness of those actions linked to the trusted operator

4.3.5.6.2.1 Developing new offers and services to meet the growing security and trust needs of digital life for BtoC customers

Offers and services to help parents better protect children on the Internet

Digital technology is a tool for progress, education and entertainment, but it also has its dangers. To encourage its responsible use, reduce children's screen time and combat the scourge of cyber harassment, Orange accelerated the roll-out of the #ForGoodConnections initiative in 2025 (see Section 4.3.5.3.5.2 *Raising awareness, informing and training children, parents, educators and employees*). Orange also expanded its portfolio of offers and services in 2025 so that parents have more solutions to protect their children online.

In France, Orange has launched dedicated offers for families including more comprehensive protection solutions for children: the SaferPhone offer consists of a child protection pack that includes a parental control solution, a detection and warning service to combat cyber harassment in partnership with the French start-up "SafeBear," a mobile spam call blocker to block unwanted calls and support for the installation and use of the child protection pack.

In Poland, the Safe Child Online app, which offers parental control services, was enhanced in 2025 with an anti-hate module to effectively help children cope with cyber harassment. This service also offers psychological support. If there are concerns about notifications received via the app or about a child's behavior, parents can consult an expert to help them find the best solution.

This year, Slovakia launched a plan for children (Pausalik) which offers parental control, a contract between parents and children on mobile phone usage and advice from the "Online Without Traps" digital education program for parents and teachers (www.beznastrah.online).

These offers and services supplement existing measures, particularly parental control services, whether for mobile phones, PCs or TVs, which are available in all European countries.

The challenge with these offers and services is to meet the needs of parents and children for better online protection.

Offers and services to help customers better protect themselves against scams and cyberattacks

With the growth in digital uses, users are continually sharing information, content and files. Cyber malice is on the rise and becoming more professional, the number of attacks (viruses, phishing, ransomware, fraudulent text messages, etc.) is increasing and fraud is becoming more difficult to detect. BtoC customers have high expectations when it comes to protecting their digital lives. Orange is taking action to help them better protect themselves against cyber-attacks and/or frauds, by offering digital risk awareness training as well as support and protection services. Orange is thus strengthening its role as a responsible actor and pursuing the opportunity for revenue growth.

Orange aims to have in its catalog at least one cybersecurity offer, in all the countries where it operates and where relevant, by 2030.

Accordingly, in 2024, Orange launched the Orange Cybersecure offer in France, drawing on the expertise of Orange Cyberdefense. This is a comprehensive new cybersecurity solution, intended for all customers. It offers unprecedented protection against telephone and Internet fraud. It consists of an Orange Cybersecure verification portal open to everyone, whether or not they are customers, and a protection pack for its customers. In 2025, Orange focused on improving its offer, the customer experience and the quality and speed of fraud detection analysis on the verification portal, relying on both AI capabilities and Orange Cyberdefense's expertise. This Orange Cybersecure offer will gradually be expanded in Europe.

Orange also continues to roll out malicious site filtering services, which are already available in many European countries, with the launch of Cyberfilter in the Caribbean, Reunion and Moldova in 2025. Orange also offers security suites that typically include antivirus, anti-spam email and identity protection services in most European countries.

Orange is also active in combating texting fraud: in France, Orange analyzes more than 6,000 spam text reports sent by customers daily to 33,700, the multi-operator platform for combating unwanted texts and calls. All texting fraud attempts from French or foreign mobile phone numbers are analyzed and the lines are blocked. A minority of reports concern fraud sent by companies, sometimes by spoofing the sender's name in the message header. Every report is analyzed, fraudulent messages are blocked and the sender is subject to penalties. Orange also works with other French mobile operators within the French Association for the Development of Multi-operator Multimedia Services and Uses (*Association Française pour le développement des services et usages Multimédias Multi-opérateurs – AF2M*) to monitor the use of the names of sensitive senders, such as those from the banking or financial sector.

4.3.5.6.2.2 Developing new offers and services to meet the growing security and trust needs of digital life for BtoB customers

Cybersecurity offers and services for BtoB customers

Against the backdrop of growing cyber threats (+17% according to the 2026 Security Navigator, a report published every year by Orange Cyberdefense), Orange provides cybersecurity offers and services to meet the needs of BtoB customers. These offers are strengthened by local capabilities in some countries, including Security Operations Center (SOC) services for large BtoB customers.

Orange has set the goal of offering its BtoB customers at least one cybersecurity solution in 2030 in all countries and in each customer segment. To that end, since February 2024 Orange has defined and implemented a cyber strategy for BtoB customers, in particular in Europe, by customer segment (small businesses, medium-sized companies, key accounts). The idea is to work toward the gradual harmonization of existing solutions within the Group (Cybersecure, cyberfilter, cyberprotection, MicroSOC, etc.).

In 2025, Cyberfilter for professionals was launched in the Caribbean, Reunion, Moldova, Slovakia, Poland, Spain and Belgium for the Small Office Home Office customer segment. Cyberfilter is a mobile or fixed network protection solution that performs URL domain name system (DNS) filtering to block access to malicious sites.

In 2025, Orange Cyberdefense continued to grow based on a comprehensive range of 360° cyber solutions for its BtoB customers, from SMEs to very large companies, thanks to four main levers:

- participating in events to support its customers and promote its offers and expertise, for example, with the annual publication, in December, of its Security Navigator, which allows information sharing on cyber threats;
- supporting partners in difficulty during cybersecurity crises, with both technical analysis and crisis cell coordination: in 2025, Orange Cyberdefense conducted more than 320 digital investigations and managed more than 20 crises for its customers;
- continuing to develop consulting offers around AI security and implementation of the European Network and Information Security 2 Directive;
- developing the MicroSOC offer, which is now five years old, for customers in the Pro-SME market, allowing each customer to choose the depth and nature of its protection, while benefiting from Orange Cyberdefense's expertise. The MicroSOC solution is now available in four complementary modules: Micro-SOC EndPoint protects endpoints (laptops, servers), Micro-SOC Shield protects networks, Micro-SOC Email & Cloud secures messaging services and Cloud environments, and Micro-SOC Mobile protects mobile devices. In 2025, Micro-SOC EndPoint was rolled out in Spain, Belgium, Romania and Morocco.

Orange Cyberdefense also supports the public sector and is strengthening its commitment to healthcare facilities through its active participation in the CARE program, led by the French State. This system has enabled many healthcare institutions to initiate a structured approach to cybersecurity, based on Orange Cyberdefense's support and solutions.

Orange Cyberdefense also continues to develop its expertise in the market to establish its leadership position in cybersecurity services in Europe. This know-how is reflected in its certifications and ratings. Orange is now positioned as a major player in the cybersecurity sector in Europe. Since 2024, it has been rated:

- leader in France in the Exaegis Markess classification for ecosystems – Cybersecurity;
- leader in France, England, Switzerland and Germany in Information Services Group's ISG Provider Lens reports for next-gen SOC activities et leader in France for SOC, next-gen SOC, Technical Security Services, Digital Forensics and Incident Response, Strategic Security Services and Risk-based Vulnerability Management activities;
- leader in France in the PAC RADAR report for Cybersecurity Services IT/IOT;
- worldwide leader in the IDC reports for Managed SASE Services and Managed SD-WAN Services.

In France, Orange Cyberdefense is a cybersecurity service provider whose expertise and know-how are recognized by the French information systems security agency (Agence Nationale de Sécurité des Systèmes d'Information – ANSSI) and the cybermalveillance.gouv.fr platform launched by the French government and ecosystem players to assist victims of cybermalicious acts. ANSSI has awarded Orange Cyberdefense security visas for four of the most demanding qualifications: general security baseline (*référentiel général de sécurité* – RGS)/military planning law (*loi de programmation militaire* – LPM) information systems audit (Prestataire d'audit de la sécurité des systèmes d'information – PASSI) since 2019, LPM security incident detection (*prestataire de détection des incidents de sécurité* – PDIS) since 2019 and security incident response (*prestataire de réponse aux incidents de sécurité* – PRIS). In July 2024, Orange also became one of the first companies to receive a security visa from ANSSI for the security support and consulting (*prestataire d'Accompagnement et Conseil en Sécurité* – PACS) qualification for its information systems security risk management consulting activities and its information systems security certification consulting activities.

In addition, the renewal of its Qualiopi certification as a training organization attests to the quality of its services based on a framework developed by the government.

Finally, Orange Cyberdefense has been ISO 9001 certified in France for several years, across all of its activities, guaranteeing its customers the quality of all its services and the continuous improvement of its processes.

All of these qualifications enable Orange Cyberdefense to offer comprehensive support for threat life cycle management (from anticipation to remediation) to all companies that would like to rely on a trusted partner that complies with ANSSI's standards, whether or not they are Operators of Vital Importance (*Opérateurs d'Importance Vitale*, OIVs) or Operators of Essential Services (*Opérateurs de Services Essentiels*, OSEs). These qualifications demonstrate long-term compliance with regulatory, technical and organizational security requirements. They also reflect its skills and its commitment to maintaining a number of competent, ANSSI-certified experts.

Trust and digital sovereignty solutions

In the face of rising cyberattacks, strengthened regulations such as the NIS2 Directive and the Digital Operational Resilience Act (DORA) and growing European digital dependence, Orange customers need secure and sovereign alternative solutions to protect their digital future.

Orange Business's mission is to provide robust, transparent and certified solutions that modernize its customers' information systems while managing risks, costs and performance.

Orange Business meets these challenges with a unique and differentiated offer, covering the entire digital value chain by offering alternative trust solutions for every customer need:

- resilient connectivity: thanks to its full control over the network, Orange Business ensures optimal availability;
- trust Cloud: ANSSI-certified SecNumCloud, guaranteeing data security and sovereignty;
- sovereign collaboration and communication solutions: with 100% French partners such as Bluemind, Jalios and Exoplatform;

- comprehensive support for the implementation, management and monitoring of infrastructure, specific connectivity and security of customers' critical data, with fully dedicated operational models for the most sensitive sectors such as defense and banking ("Secure Cockpit" service); and
- finally, robust cybersecurity with Orange Cyberdefense, for enhanced protection against all threats (see previous *Cybersecurity offers and services for BtoB customers* section).

Orange Business's objective is to provide concrete elements to strengthen digital trust by ensuring resilience, security, regulatory compliance, data localization and immunity to extraterritorial laws for all these solutions.

4.3.5.6.3 S4-5 – Targets related to managing the material opportunity as a trusted operator

In connection with the opportunity as a trusted operator, Orange seeks to support its customers and users in addressing the threats and risks of digital technology. By providing at least one cybersecurity offer for its BtoC customers and one cybersecurity offer for its BtoB customers in each of its countries, Orange gives them the keys to address the primary risks, namely cyber attacks and scams. Since the risks for children are specific, Orange also seeks to offer families at least one digital protection offer for children in each of its countries.

Orange has therefore set three digital trust targets for end-2030:

- BtoB cybersecurity offers: 100% of countries where Orange, as an operator, provides at least one cybersecurity offer in its catalog on the BtoB market;
- BtoC cybersecurity offers: 100% of countries where Orange, as an operator, provides at least one cybersecurity offer in its catalog on the BtoC market;
- digital protection offers for children: 100% of countries where Orange, as an operator, provides at least one digital protection offer for children in its catalog.

The scope of these targets covers commercial offers proposed by Orange, as an operator, on its BtoC and BtoB markets. Cybersecurity offers sold directly by the Orange Cyberdefense teams are not included.

The offers are defined as follows:

- cybersecurity offers aim to protect customers and their personal data from leaks, breaches or uses resulting from cyber attacks and scams. They include a cybersecurity solution;
- digital protection offers for children give parents the means to ensure that their children can grow up safely in this fast-changing digital environment and be protected, in particular from excessive screen time, inappropriate content and the risks of cyber harassment.

These targets are monitored to ensure that progress is made on the offers available to customers in the countries. The reporting corresponding to these targets will be carried out from 2026.

They are supplemented by the analysis of customer satisfaction with these offers and the monitoring of Orange's brand image on the subject of digital protection through surveys.

No stakeholders were involved in setting the targets.

4.4 Governance

Orange has identified a financial and reputational risk in the event of corruption and regulatory non-compliance with business ethics.

In order to limit this risk, Orange promotes ethical business conduct within its organization and ecosystem, and implements systems to prevent and manage, in particular, the risk of corruption and influence peddling.

Matters for Orange	Impacts, Risks, Opportunities	Policies	Main action plans
Governance, ESG culture, ethical business conduct	Financial and reputational risk in the event of corruption and regulatory non-compliance with business ethics	Group Code of Ethics Group anti-corruption policy Group policy for compliance with economic sanction programs and trade control rules Code of Ethics for Tax Professionals	– Promote an ethics and compliance approach – Roll out the corruption and influence peddling risk prevention program – Roll out the <i>Hello Ethics</i> Group whistleblowing system – Organize training and awareness-raising actions for the teams – Implement the guidelines on conflicts of interest – Ensure compliance with economic sanction programs and trade control rules – Ensure competition law compliance – Implement the tax policy – Implement the interest representation system

4.4.1 ESRS 2 GOV–1 The role of the administrative, management and supervisory bodies

Governance established at several levels of the company helps control risks of ethical misconduct:

- at the Board of Directors level, through the direct involvement of the Governance and Corporate Social and Environmental Responsibility Committee (GCSERC). It monitors the progress of the roll-out of the corruption prevention program within the Group, in particular in the context of implementation of the measures resulting from French Law 2016-1691 of December 9, 2016 on transparency, the fight against corruption and the modernization of economic life, known as “Sapin 2,” and Government Order 2017-1180 of July 19, 2017 on the publication of non-financial information. In 2025, the review by the GCSERC took place on November 19 (see Section 4.1.2.1.2 *Approval and oversight of actions*);
- at the level of the Executive Committee, in particular with the Group Investment Committee, of which the Group’s Chief Compliance Officer is a member so he can provide his analysis of investment projects.

The operational organization of risk management has several levels:

- the Group’s Compliance Department, created in 2012, was confirmed by a decision of Orange’s Chief Executive Officer on March 12, 2025. This department acts under the responsibility of the Group Chief Compliance Officer, who reports to the Orange Secretary General. This team is in charge of designing, rolling out, coordinating and controlling Group-wide compliance programs (see Section 2.1.3.5 *Ethics and compliance*);

- the “Ethics and Compliance” network, composed of the Ethics Advisors and Chief Compliance Officers (CCOs) of the divisions (appointed by the members of the Executive Committee) and countries (appointed by the country CEOs). The CCOs have a network of Compliance Officers (COs) available on an as-needed basis;
- to perform their work, these networks rely on the expertise and resources of the Group Audit, Control and Risk Management Department and the Group Legal Department.

In accordance with the recommendations of the Afep-Medef code, the members of the Board of Directors and Executive Committee complete an annual declaration of interest.

Under its new business model, the Executive Committee has direct visibility on the ethics and compliance programs: the Orange Compliance Director presents, at least once a year, the compliance program review, the action plan and the *Hello Ethics* Group whistleblowing system review. In addition, every year the Orange Compliance Director gives the Chief Executive Officer a presentation on all allegations or suspicions of corruption, influence peddling or internal fraud detected throughout the Group and handled as part of the case management process overseen with the Audit, Control and Risk Management Department (DACRG). In 2025, this presentation took place on July 17, 2025. The Chief Executive Officer of Orange presents a summary of this report to the Audit Committee.

4.4.2 G1-1 – Business conduct policies and corporate culture and G1-3 – Prevention and detection of corruption and bribery

4.4.2.1 Ethics and compliance approach

The financial and reputational risk management framework in the event of corruption is based on an ethical approach, supported by the Orange Code of Ethics. This is based on the following four commitments: respect, integrity, quality, and team spirit. The Code of Ethics describes the principles of action with respect to stakeholders and the principles of individual behavior that must guide the conduct of employees in their professional activities. These reflect the same fundamental principles as those set out in the Universal Declaration of Human Rights, as well as by the International Labor Organization (ILO) and the Organization for Economic Co-operation and Development (OECD) and the commitments undertaken by Orange in terms of social responsibility. In particular, the charter affirms the principle of zero

tolerance toward corruption and influence peddling and applies to all Group entities.

The prevention and detection of the corruption risk are part of this ethical business conduct approach implemented in the early 2000s. The program is regularly enhanced in order to comply with the various regulations, in particular the US Foreign Corrupt Practices Act (FCPA), the UK *Bribery Act* and the French “Sapin 2” law.

The comprehensive approach to managing risks of unethical behavior and risks of non-compliance (fraud, corruption and influence peddling and all violations of business ethics) is incorporated into all Orange activities and, in particular, into its relations with stakeholders. It is aimed at continuous improvement and is built around six steps: setting the tone, governance, risk analysis, policies and procedures, awareness-raising and training, and audits.



Orange's compliance program is based on:

- strong commitments in terms of Group policies, supported by Orange's Chief Executive Officer, with, in particular, adaptations of the Group's Code of Ethics, the first version of which was adopted in 2003, like the Supplier Code of Conduct (see Section 4.3.3.2.4.1 *Ensuring that Orange's expectations in terms of respect for human rights in the value chain are taken into account*) and the Data and AI Ethics Charter (see Section 4.3.5.5.2.3 *Data and Artificial Intelligence Ethics Charter*). The “tone at the top,” driven by executives and managers, is unambiguous: present in the Group's Code of Ethics and its anti-corruption policy, this commitment to responsibility and integrity is regularly and publicly reaffirmed;
- governance established at several levels of the undertaking helps control risks (see Section 4.4.1 *ESRS 2 GOV–1 The role of the administrative, management and supervisory bodies*);
- an analysis of the risks of corruption and influence peddling carried out at the level of the Group, subsidiaries and relevant entities in order to identify major risks and to define and roll out management actions. The analysis of corruption risks (risk mapping and associated action plans) is the essential step in Orange's approach. Risk mapping is consolidated at the division level and then at the Group level: it is then approved by the Executive Committee;
- Group policies and procedures adapted to local situations, including:
 - an anti-corruption policy (see Section 4.4.2.2 *Anti-corruption policy*),
 - a third-party fraud and compliance due diligence procedure (see Section 4.4.2.3 *Due diligence procedure*),
 - rules on gifts and invitations that govern any benefits received or offered; dedicated apps are rolled out to track declarations and manager approvals of any overruns of the established thresholds,
 - guiding principles on the prevention and management of conflicts of interest,
 - a system of accounting controls that can play a part in the prevention and detection of fraud, of the override of internal procedures, of corruption and of the laundering of these practices,
- a Group whistleblowing system and local whistleblowing systems that are monitored annually (see Section 4.4.2.4 *Group whistleblowing system*);

- training and awareness programs on ethics and the prevention of corruption (see Section 4.4.2.5 *Awareness-raising and training systems*);
- regular control measures (internal audits, project reviews, etc.) to assess the efficiency of the measures implemented and to identify areas for improvement;
- a case management process that identifies allegations or suspicions of corruption, influence peddling or internal fraud resulting from different sources (internal audits, complaints, fraud detection, whistleblowing system, etc.).

This compliance program is monitored as part of the Group internal control system and by audits carried out by Group Internal Audit. It is also presented to the Statutory Auditors as part of their audits of the control environment and the certification of the financial statements.

It is reviewed every year in the Board of Directors through presentations of the work of the GCERC.

4.4.2.2 Anti-corruption policy

In order to better control the risk of financial sanctions and the risk of seeing the liability of its executives engaged in the event of a breach of business ethics, and more particularly in the event of corruption or by its employees, Orange has implemented an anti-corruption policy. The objective of this policy is to provide all Group workers with a framework of principles to be respected in the context of its activities and behaviors to be proscribed as they could be indicative of corruption or influence peddling.

This anti-corruption policy is defined in accordance with the 1997 OECD Anti-Bribery Convention and the 2003 United Nations Convention Against Corruption. It meets the requirements of the so-called “Sapin 2” law. As such, this anti-corruption policy is the equivalent of a “code of conduct” within the meaning of Article 17 of that law. It also meets the requirements of the US Foreign Corrupt Practices Act (FCPA), as well as the UK *Bribery Act*.

It is rolled out or adapted throughout the Group and its subsidiaries. This policy applies to all Orange workers and must be respected by all stakeholders with which the Group is engaged (undertakings, subcontractors, partners, consultants or intermediaries working for the Group or on behalf of Orange). In the event of a violation of the anti-corruption policy, any Group employee is exposed to the disciplinary sanctions provided for in the Internal Guidelines.

Orange’s anti-corruption policy includes a definition of corruption and influence peddling offenses and affirms the principle of zero tolerance for corruption and influence peddling. It sets out the measures to prevent and combat corruption and influence peddling as well as how the policy is managed.

The Management Committee of the subsidiary or entity is responsible for ensuring that the anti-corruption policy complies with the legal and ethical obligations of the country or countries in which it operates and that all those under its control comply with it. The Boards of Directors of Orange and the subsidiaries assess the effectiveness of the corruption prevention program at least once a year. The Chief Compliance Officers (CCOs) and Compliance Officers (COs) are responsible, within their respective scopes, for overseeing the policy roll-out program and for monitoring its effectiveness.

This policy is supplemented by “the Orange group’s guidelines on the prevention of corruption.” In addition, each entity or subsidiary may supplement it, in particular with regard to any adaptations imposed by local laws and regulations.

Orange disseminates its anti-corruption policy based on internal information tools, such as Intranets (Group Intranet and those of subsidiaries), which have sections dedicated to the prevention of corruption, the whistleblowing system and the prevention of conflicts of interest.

The anti-corruption policy can also be accessed on Orange’s website (www.orange.com) and on the website for Orange suppliers.

4.4.2.3 Due diligence procedure

Orange has defined a specific risk-based process to assess the situation of third parties with regard to the risks of fraud and non-compliance and applies it to partners, intermediaries and BtoB customers. It focuses efforts on the analysis of “at-risk” partners and takes place in two stages:

- a pre-assessment of the partner’s overall risk level is first carried out using the “country” and “partner” criteria. Based on the assessment one of four levels of risk rating (low, moderate, high and very high) can be assigned;
- then, a set of controls adapted to each level of risk constitutes proper due diligence, which make it possible to identify potential red flags and to issue recommendations in order to inform management’s decision-making on whether or not to sign a contract with that partner.

It is regularly updated and refined, and rolled out throughout the Group and its subsidiaries. This is subject to “project reviews,” which allow for its implementation to be precisely monitored and areas for improvement to be identified in each division or country, notably through targeted training.

4.4.2.4 Group whistleblowing system

In the early 2000s, Orange set up a whistleblowing system open to all Group employees. This system has been strengthened year after year and is now open to partners, suppliers, workers in the value chain or any external stakeholder. It was presented to the employee representative bodies before implementation and is regularly adapted to comply with the “Sapin 2,” “duty of vigilance” and “Waserman” (the latter transposing into French law the European directive on protection for whistleblowers) laws.

The system, called *Hello Ethics*, can be used to report conduct or situations that go against the Group’s anti-corruption policy, Code of Ethics, or policies and procedures relating to accounting, internal control and auditing, that represent a clear and serious violation of laws or regulations, or that seriously infringe human rights and fundamental freedoms, the health and safety of individuals or the environment.

Hello Ethics can be accessed on Orange’s website (www.orange.com), the Group’s Intranets and via public search engines⁽⁸²⁾; it may be supplemented by local systems of the country subsidiaries in the form of dedicated email addresses.

Employees are regularly provided information on *Hello Ethics* and on local systems through training courses and communication campaigns (emails, Intranet, site posters, etc.).

Reports are processed according to the Group or subsidiary procedure: acknowledgment of receipt, review of the admissibility of the report and processing by authorized teams while respecting the confidentiality of the whistleblower’s identity and the people concerned throughout the process. This procedure is available on the Group Intranet and on the *Hello Ethics* platform.

(82) <https://helloethics-orange.integrityline.com/>

Persons authorized to collect and process reports are required to act impartially and confidentially. Orange has a specialized team independent of the management line of the persons concerned, which carries out, at the request of management or compliance, internal investigations in the event of a justified report, suspected fraud or corruption: the investigation team, including people from the Group's General Control as needed, is small, duly authorized and subject to an enhanced obligation of confidentiality. The team conducts investigations in accordance with laws and regulations (see Section 2.1 *Activity and risk management framework*).

Orange's anti-corruption policy specifically provides for the protection of employee whistleblowers. The whistleblowing procedure provides protection for individuals who meet the legal

definition of whistleblowers, in accordance with legal and regulatory provisions:

- Orange undertakes to ensure that no employee will be punished, dismissed or subjected to any discriminatory measure, whether direct or indirect, for having, in a disinterested manner and in good faith, reported facts of which they have personal knowledge;
- Orange also undertakes to ensure that the procedures implemented to collect reports ensure that the identity of the author of the report and the information collected through the Group's whistleblowing system remain strictly confidential, in accordance with the applicable laws and regulations.

Breakdown of whistleblowing alerts by domain collected on *Hello Ethics*:

Alert type (all origins, excluding questions)	2025
Ethics violations, fraud, corruption, other violations of laws and regulations	19%
Harassment, sexism, discrimination, violence in the workplace (HSVW)	11.9%
Environment	0.6%
Human rights and fundamental freedoms	1.5%
Health and safety	1.7%
Personal data	0.2%
Customer complaints	23.3%
Human Resources	7.3%
Other	12%
Not relevant	22.5%

The year 2025 saw growth of 26% in the total number of messages received on *Hello Ethics* compared with 2024, i.e. 478 reports and 86 questions.

In particular, it should be noted that the proportion of alerts related to the *Hello Ethics* scope rose to 35% (versus 31% in 2024), although the weight of messages related to customer complaints, human resources, other or irrelevant remained significant at 65%.

4.4.2.5 Awareness-raising and training system

4.4.2.5.1 Training tools and materials

Since 2015, Orange has developed training modules on ethics and corruption risk prevention topics for all employees.

Since 2018, Orange has developed several online training modules to cover the entire Group and to ensure the enrichment and renewal of training content. This may be content designed in-house or market content adapted to Orange's context and rules. The 30–60-minute training modules are generally available in several languages. They contain a final assessment questionnaire at the end.

The modules, designed primarily to train the most exposed employees, have also been used for a wider audience by the entities.

In 2025, the "Business ethics: making the right decision" e-learning course was widely rolled out at the request of the Executive Committee as a mandatory priority training for all Group employees. In particular, it presents Orange's Code of Ethics, ethical dilemma situations and the conduct expected of employees (see Section 4.3.2.2.2.3 *Develop employees' skills*).

In addition to general modules, specific modules have been developed on:

- customer relations ethics, with the sales teams and maintenance technicians as the primary targets;
- trade control rules and compliance with international economic sanction programs for people exposed to economic sanctions and trade control (*supply chain*, for example);
- conflict of interest prevention.

Some members of the Board of Directors, in particular the directors representing employees, receive the same training as that offered to Group employees; the other members of the Board, due to the functions they otherwise perform, either as business leaders or executives, or as representatives of the public sector, benefit from all the expected training in business conduct and the fight against corruption (see Section 5.2.1.3 *Application of the principle of diversity and balanced gender representation – Diversity of expertise on the Board*).

4.4.2.5.2 Orange Ethics & Compliance Day

The aim of this annual internal event is to develop awareness of ethics and compliance topics. It gives rise to numerous actions organized locally by CCOs, COs and ethics specialists in divisions and countries, such as video messages or emails from CEOs or CCOs, training sessions, posters, games, competitions, discussions and debates with internal or external experts. The conferences organized at the Orange headquarters are broadcast live throughout the Group and dubbed in three languages (English, Arabic and Polish); the recording is available and accessible online to all employees for educational purposes on the Group's internal websites. The Ethics & Compliance Day review is formalized.

The 13th Orange Ethics & Compliance Day was held on October 1 and 2, 2025.

4.4.2.5.3 Identification of sensitive functions and areas

Recommendations regarding sensitive functions or areas are also made available to Compliance Officers to guide them in identifying the individuals most exposed to corruption risks, in order to train them as a priority. These recommendations include a list of sensitive functions, areas or activities.

For example: employees working with public authorities and administration, employees working with lessors and owners (for example for the installation of antennas), employees working with local authorities and elected officials, employees working with charitable organizations, NGOs and associations, employees working with business intermediaries, commercial and non-commercial agents, employees in charge of mergers/acquisitions and joint ventures, and employees working with distribution partners and indirect distributors.

	2025	2024
G1-3 21 b Percentage of functions-at-risk covered by training programs	96.4%	95%

4.4.2.6 Compliance with economic sanction programs

In 2013, the Group adopted an economic sanctions program, which was updated and reinforced in 2022, in order to secure its business and international development. The Group remains vigilant in the face of a changing environment and the existence of numerous, evolving economic sanctions programs and embargoes, and in particular carries out compliance due diligence on its relations with partners, suppliers and customers.

An Economic Sanctions and Trade Control Committee analyzes changes in the international regulations to which the Group is subject, adjusts the internal system in place accordingly, and oversees reviews aimed at assessing the Group's exposure to this risk.

The year 2025 was marked in particular by the strengthening of economic sanctions and export controls enacted by the European Union, the United States and the United Kingdom against Russia and Belarus, and by the simultaneous reinforcement of the associated compliance action plans.

Compliance with economic sanction programs has been subject to internal audits by the Group Audit, Control and Risk Management Department.

4.4.2.7 Competition law compliance

Orange establishes its commercial practices in compliance with the legal and regulatory obligations in force in the countries where the various Group entities operate.

Orange is implementing a policy of compliance with competition law, which aims to meet the relevant expectations and guiding principles defined by the competition authorities. As such, compliance with the principle of fair competition in the conduct of all of Orange's business is included in the Group's Code of Ethics.

The policy of compliance with competition rules is built around the actions of the Group Legal Department. Its permanent mission is to raise awareness of competition rules among all Group entities, in order to ensure that all stakeholders understand and comply with the legal requirements; at the same time, the Group Legal Department also offers consulting services specific to entities particularly exposed to competitive risks, with a view to supporting them in managing these risks and implementing appropriate preventive measures.

The Group has thus developed a program to raise awareness of competition rules which incorporates various training and support tools specific to the issues Orange faces on its markets. This program capitalizes on the high degree of integration and close involvement of the General Secretariat's legal and regulatory teams with all of the operational entities. The Group Legal Department is present or represented at all levels of the company's decision-making across all of its geographic markets.

Among the various training and awareness-raising tools, all Group employees have access to a minimum knowledge base in competition law, particularly through the "Antitrust for All" training course, which is available on the Group's training portal (Orange Learning).

This general training course aims to raise awareness among all Group employees of:

- the existence, purpose and content of Orange's program for compliance with competition rules;
- the meaning of competition rules and their practical scope;
- the importance and benefits of complying with these rules in the conduct of their business;
- the internal mechanisms that can be used to obtain advice or raise any questions or uncertainties about compliance with these rules.

The Group Legal Department is also implementing an annual training course for all of the Group's attorneys ("Antitrust Academy for Legal" program) to ensure first-level support for all the operational entities they assist. This broad approach is supplemented by the direct involvement of the Group Legal Department, which makes sure the program is consistent and stays up to date with competition rules.

Not all categories of employees will necessarily receive the same levels of information, and each level is adjusted to the entities in question. Some training courses are thus intended specifically for certain operational entities that are particularly exposed (wholesale, technical & networks, sales teams, etc.). Accordingly, a catalog that compiles the specific training courses, guidelines and documentation, categorized by business line or business scope, is made available by the Legal Department team on the Group's Intranet, and is updated regularly.

The Group Legal Department is the primary and central channel for receiving alerts on any anti-competitive practices that may be detected by the operational entities or by the local legal departments that support them.

In addition to this direct channel, all Orange employees have access to a Group whistleblowing system (see Section 4.4.2.4 *Group whistleblowing system*). If competition law alerts are reported through this channel, the Group Compliance Department takes the matter directly to the Legal Department to ensure full and necessary compliance.

In all the Group's regions, Group teams regularly communicate on the rules and processes to be implemented, and support local teams to ensure the same level of compliance.

4.4.2.8 Tax policy

Owing to its business, Orange has assets and employees in a number of countries. Orange pays taxes and duties in the countries in which it operates in accordance with the laws of each of those countries. Orange publishes information relating to operating taxes and levies payables in the Notes to the Consolidated Financial Statements, including information on the breakdown of taxes payable by geographical region or by tax consolidation group over three fiscal years (see Section 3.3 *Consolidated Financial Statements* – Note 10 *Taxes*), and in its annual Tax Transparency Report⁽⁸³⁾.

(83) Orange Gallery Governance: <https://gallery.orange.com/en/home>

The Group's approach to tax matters is based on three fundamental principles:

- comply with the laws of each country;
- comply with the OECD principles: Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations;
- regularly assess practices and compare them with existing solutions in the market to ensure their relevance.

Orange in no way seeks to avoid paying taxes and duties, including through complex and opaque structures. Orange publishes a list of countries in which the Group has interests (see Section 3.3 *Consolidated Financial Statements* – Note 20 *List of major consolidated companies*).

The Group Tax Director, who reports directly to the Chief Executive Officer Finance, Performance and Development, has a dedicated team. Orange has implemented, under the oversight of the Group Tax Director, a Code of Ethics for Tax Professionals, communicated to tax professionals as soon as they join the Group; the Code applies to all Group tax specialists and concerns all tax transactions. The Code states that "the Orange group's tax specialists may propose the tax options most favorable to the Orange group, knowing that their proposals must be made based on an analysis that is professional, honest, objective and lawful."

Each year, the tax process is reviewed (see Section 2.1.2.2 *Work relating to Financial Internal Control*). This control process covers Orange SA and its main subsidiaries. The work conducted by Orange resulted in satisfactory conclusions for fiscal year 2025.

4.4.3 G1-4 – Incidents of corruption or bribery

To the best of Orange's knowledge, in 2025 Orange did not face any convictions or fines for violations of anti-corruption laws (G1-4 24 a).

4.4.4 G1-5 – Political influence and lobbying activities

Orange has organized its interest representation activities at both Group level – its representatives responsible for conducting interest representation activities being the Chief Executive Officer, the Secretary-General of the Group, the Director of Public Affairs and the Director of Regulation – and, where applicable, at the level of the country subsidiaries, under the responsibility of their Chief Executive Officer in close coordination with the Group's General Secretariat.

The foundations of this activity are set out in Orange's guidelines on the prevention of corruption, which stipulate that "the Orange group lobbying representative, who is in charge of following up and anticipating public policies that are likely to affect the Group's activities and of raising the awareness of public authorities on the challenges and issues faced by the company, embodies the principles defined in the Orange group Code of Ethics."

Those who perform interest representation activities for the Group are clearly identified by Group governance and by their titles; in particular, they guarantee:

- transparency, by disclosing their identity and the interests defended;
- compliance with business ethics, by refraining from taking any steps to obtain information or decisions by fraudulent means;
- guaranteed quality and reliability of the information provided to public authorities, without political exclusivity;
- and responses to any request for information.

In addition, Orange does not make donations to political parties and prohibits any direct or indirect company contribution (cash, valuables, goods or services, loans, loan guarantees) to political parties.

Similarly, the Group's representation activities forbid any political statements on behalf of the company.

The Group accordingly acts in compliance with the Code of Conduct for Interest Representatives before European bodies, and in particular:

- in France, Orange acts transparently in its interest representation activities and has been registered since its founding with the High Authority for Transparency in Public Life (HATVP), in compliance with the provisions of Article 25 of the "Sapin 2" law governing its relationships with national public decision-makers. Since 2023, when the register was expanded to include local decision-makers in particular, Orange has also been reporting representation activities concerning them;
- Orange is also listed in the European Union Transparency Register and complies with all its obligations.

No other country where Orange operates has a framework comparable to that of France, with HATVP, or the European register.

The Group's positions are well known, both due to their public nature at parliamentary hearings and press appearances, and through its publication of position papers for the European Union since 2014 or posts on social networks.

In 2025, the Group expressed its opinions to European authorities, national authorities and international and multilateral organizations on climate change mitigation (see Section 4.2.2.2.7 *Other initiatives related to climate change mitigation and energy*), waste recycling (see Section 4.2.3.2.3.4 *Cooperating with service providers, peers and European organizations to improve waste management processes*), protection of minors (see Section 4.3.5.3.5.5 *Expressing opinions to public decision-makers*) and consumer protection (see Section 4.3.5.2.6.1 *Rolling out the personal data protection program*).

Orange has not appointed, during the 2025 reporting period, any new members to the Board of Directors having had a comparable role in a public administration in the two years preceding the appointment.

Appendix 1: GOV-4 – Statement on sustainability due diligence

Core elements of due diligence

URD section

Embedding due diligence in governance, strategy and business model

4.1.2.2	GOV-2 – Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies
4.1.2.3	GOV-3 Integration of sustainability-related performance in incentive schemes
4.1.3.3	SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model
2.3	Vigilance Plan

Engaging with affected stakeholders in all key steps of the due diligence

4.1.2.2	GOV-2 – Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies
4.1.3.2	SBM-2 – Interests and views of stakeholders
4.1.4.1	IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities
4.2.2.2.1	E1-2 – Policies related to climate change
4.2.3.2.1	E5-1 – Policies related to resource use and circular economy
4.3.1.1	Group human rights policy
4.3.2.4.1	S1-1 – Policies related to own workforce linked to health and safety
4.3.3.2.1	S2-1 – Policies related to value chain workers
4.3.3.2.2	S2-2 – Processes for engaging with value chain workers about impacts
4.3.3.2.3	S3-3 – Processes to remediate negative impacts and channels for affected communities to raise concerns

Identifying and assessing adverse impacts

4.1.4.1	IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities
4.2.2.1.2	ESRS 2 IRO-1 – Climate risks and scenario analysis
4.2.3.1	ESRS 2 IRO-1 – Description of the processes for identifying and assessing the material impacts, risks, and opportunities related to resource use and the circular economy
4.3.2.1	ESRS 2 SBM-3 – IROs and their interaction with strategy and business model
4.3.3.1	ESRS 2 SBM-3 – IROs and their interaction with strategy and business model
4.3.5.2.1	ESRS 2 SBM-3 – IROs and their interaction with strategy and business model
4.3.5.3.1	ESRS 2 SBM-3: IROs and their interaction with strategy and business model
4.3.5.4.1	ESRS 2 SBM-3: IROs and their interaction with strategy and business model

Taking action to address those adverse impacts

4.2.2.1.1	E1-1 – Environmental and energy transition plan: mitigating and adapting
4.2.2.2.2	E1-3 – Actions and resources related to policies associated with the impacts and risks related to climate change mitigation and energy
4.2.2.2.3	E1-3 – Actions and resources related to policies associated with impacts and risks related to climate change adaptation
4.2.3.2.2	E5-2 – Actions and resources related to resource use and circular economy (linked to resource inflows)
4.2.3.2.3	E5-2 – Actions and resources related to resource use and circular economy (linked to waste)
4.3.2.4.2	S1-4 – Taking action on the material impact and risk related to own workforce, and effectiveness of those actions linked to health and safety
4.3.3.2.4	S2-4 – Taking action on material impacts on value chain workers, and effectiveness of those actions
4.3.5.2.6	S4-4 – Taking action on the material impact and risk related to consumers and end-users, and effectiveness of those actions linked to personal data protection and cybersecurity
4.3.5.3.5	S4-4 – Taking action on the material impact on consumers and end-users, and effectiveness of those actions linked to the health and well-being of users, including children
4.3.5.4.5	S4-4 – Taking action on the material impact and risk related to consumers and end-users, and effectiveness of those actions linked to continuity of service

Tracking the effectiveness of actions and communicating

4.2.2.3	E1-4 to E1-8 – Targets and metrics related to climate change
4.2.3.3	E5 – Targets and metrics related to resource use and circular economy
4.3.1.5	Severe human rights incidents at the Group
4.3.2.4.3	S1-5 – Targets related to managing the material impact and risk concerning health and safety
4.3.3.2.5	S2-5 – Targets related to managing the material negative impact
4.3.5.2.7	S4-5 – Targets related to managing the material impact and risk linked to personal data protection and cybersecurity
4.3.5.3.6	S4-5 – Targets related to managing the material impact concerning the health and well-being of users, including children
4.3.5.4.6	S4-5 – Targets related to managing the material impact and risk linked to continuity of service

Appendix 2: IRO-2 – Disclosure Requirements in ESRS covered by the undertaking's sustainability statement

Disclosure Requirements	Sections of the sustainability statement
ESRS E1	
ESRS 2 GOV-3	4.2.1.2.2 ESRS 2 GOV-3 – Integration of sustainability-related performance in incentive schemes
E1-1	4.2.2.1.1 E1-1: Environmental and energy transition plan: mitigating and adapting
ESRS 2 IRO-1	4.2.2.1.2 ESRS 2 IRO-1 – Climate risks and scenario analysis
ESRS 2 SBM-3	4.2.2.1.3 ESRS 2 SBM-3 – Analysis of resilience in relation to climate change
E1-2	4.2.2.2.1 E1-2 – Policies related to climate change
E1-3	4.2.2.2.2 E1-3 – Actions and resources related to policies associated with the impacts and risks related to climate change mitigation and energy 4.2.2.2.3 E1-3 – Actions and resources related to policies associated with impacts and risks related to climate change adaptation 4.2.2.2.4 E1-3 – Actions and resources in relation to policies associated with the opportunity related to climate change mitigation and adaptation
E1-4	4.2.2.3.1 E1-4 – Targets related to climate change mitigation 4.2.2.3.2 E1-4 – Targets related to climate change adaptation
E1-5	4.2.2.3.4 E1-5 – Energy consumption and mix, and E1-6 – gross GHG emissions of Scopes 1, 2 and 3 and total GHG emissions
E1-6	4.2.2.3.4 E1-5 – Energy consumption and mix, and E1-6 – gross GHG emissions of Scopes 1, 2 and 3 and total GHG emissions
E1-7	4.2.2.3.5 E1-7 – GHG removals and GHG mitigation projects financed through carbon credits
E1-8	4.2.2.3.6 E1-8 – Internal carbon pricing
ESRS E2	
ESRS 2 IRO-1	4.1.4.1.2.1 ESRS E2 Pollution
ESRS E3	
ESRS 2 IRO-1	4.1.4.1.2.2 ESRS E3 Water and marine resources
ESRS E4	
ESRS 2 IRO-1	4.1.4.1.2.3 ESRS E4 Biodiversity and ecosystems
ESRS E5	
ESRS 2 IRO-1	4.2.3.1 ESRS 2 IRO-1 – Description of the processes for identifying and assessing the material impacts, risks, and opportunities related to resource use and the circular economy
E5-1	4.2.3.2.1 E5-1 – Policies related to resource use and circular economy
E5-2	4.2.3.2.2 E5-2 – Actions and resources related to resource use and circular economy (linked to resource inflows) 4.2.3.2.3 E5-2 – Actions and resources related to resource use and circular economy (linked to waste)
E5-3	4.2.3.3.1 E5-3 – Targets related to resource use and circular economy (linked to resource inflows) 4.2.3.3.2 E5-3 – Targets related to resource use and circular economy (linked to waste)
E5-4	4.2.3.3.3 E5-4 – Resource inflows and outflows
E5-5	4.2.3.3.4 E5-5 – Waste
ESRS S1	
ESRS 2 SBM-2	4.1.3.2 SBM-2 – Interests and views of stakeholders
ESRS 2 SBM-3	4.3.2.1 ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model
S1-1	4.3.1.1 Group human rights policy 4.3.1.2 Human rights for own workforce 4.3.1.5 Severe human rights incidents at the Group 4.3.2.2.1 S1-1 – Policies related to own workforce linked to training and skills development 4.3.2.3.1 S1-1 – Policies related to own workforce linked to employee engagement 4.3.2.4.1 S1-1 – Policies related to own workforce linked to health and safety 4.3.2.5.1 S1-1 – Policies related to own workforce linked to privacy
S1-2	4.3.2.6 S1-2 – Processes for engaging with own workforce and workers' representatives

Disclosure Requirements	Sections of the sustainability statement
S1-3	4.3.2.7 S1-3 – Processes to remediate negative impacts and channels for own workforce to raise concerns
S1-4	4.3.2.2.2 S1-4 – Taking action on the material impact, risk and opportunity related to own workforce, and effectiveness of those actions linked to training and skills development 4.3.2.3.2 S1-4 – Taking action on the material impact and risk related to own workforce, and effectiveness of those actions linked to employee engagement 4.3.2.4.2 S1-4 – Taking action on the material impact and risk related to own workforce, and effectiveness of those actions linked to health and safety 4.3.2.5.2 S1-4 – Taking action on the material risk related to own workforce, and effectiveness of those actions linked to privacy
S1-5	4.3.2.2.3 S1-5 – Targets related to managing the material risk, opportunity and impact concerning training and skills development 4.3.2.3.3 S1-5 – Targets related to managing the material impact and risk concerning employee engagement 4.3.2.4.3 S1-5 – Targets related to managing the material impact and risk concerning health and safety 4.3.2.5.3 S1-5 – Targets related to managing material risk concerning privacy
S1-6	4.3.2.8.1 S1-6 – Characteristics of the undertaking's employees
S1-8	4.3.2.8.2 S1-8 – Collective bargaining coverage and social dialogue
S1-9	4.3.2.8.3 S1-9 – Diversity metrics
S1-10	4.3.2.8.4 S1-10 – Adequate wages
S1-13	4.3.2.8.5 S1-13 – Training and skills development metrics
S1-14	4.3.2.8.6 S1-14 – Health and safety metrics
S1-16	4.3.2.8.7 S1-16 – Compensation metrics
S1-17	4.3.2.8.8 S1-17 – Incidents, complaints and severe human rights impacts
ESRS S2	
ESRS 2 SBM-2	4.1.3.2 SBM-2 – Interests and views of stakeholders
ESRS 2 SBM-3	4.3.3.1 ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model
S2-1	4.3.1.1 Group human rights policy 4.3.1.3 Human rights for workers in the value chain 4.3.1.5 Severe human rights incidents at the Group 4.3.3.2.1 S2-1 – Policies related to value chain workers
S2-2	4.3.3.2.2 S2-2 – Processes for engaging with value chain workers about impacts
S2-3	4.3.3.2.3 S2-3 – Processes to remediate negative impacts and channels for value chain workers to raise concerns
S2-4	4.3.3.2.4 S2-4 – Taking action on material impacts on value chain workers, and effectiveness of those actions
S2-5	4.3.3.2.5 S2-5 – Targets related to managing the material negative impact
ESRS S3	
ESRS 2 SBM-2	4.1.3.2 SBM-2 – Interests and views of stakeholders
ESRS 2 SBM-3	4.3.4.1 ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model
S3-1	4.3.1.1 Group human rights policy 4.3.1.5 Severe human rights incidents at the Group 4.3.4.2.1 S3-1 – Policies related to affected communities
S3-3	4.3.4.2.2 S3-3 – Processes to remediate negative impacts and channels for affected communities to raise concerns
S3-4	4.3.4.2.3 S3-4 – Taking action to manage material risks concerning affected communities, and effectiveness of those actions
S3-5	4.3.4.2.4 S3-5 – Targets related to managing material risk
ESRS S4	
ESRS 2 SBM-2	4.1.3.2 SBM-2 – Interests and views of stakeholders
ESRS 2 SBM-3	4.3.5.1.1 ESRS 2 SBM-3 – IROs and their interaction with strategy and business model 4.3.5.2.1 ESRS 2 SBM-3: IROs and their interaction with strategy and business model 4.3.5.3.1 ESRS 2 SBM-3: IROs and their interaction with strategy and business model 4.3.5.4.1 ESRS 2 SBM-3: IROs and their interaction with strategy and business model 4.3.5.5.1 ESRS 2 SBM-3: IROs and their interaction with strategy and business model

Disclosure Requirements	Sections of the sustainability statement
S4-1	4.3.1.1 Group human rights policy 4.3.1.4 Human rights for consumers and end-users 4.3.1.5 Severe human rights incidents at the Group 4.3.5.1.2 S4-1 – Policies related to consumers and end-users linked to digital inclusion and equality 4.3.5.2.3 S4-1 – Policies related to consumers and end-users linked to personal data protection and cybersecurity 4.3.5.2.1 S4-1 – Policies related to consumers and end-users linked to freedom of expression 4.3.5.3.2 S4-1 – Policies related to consumers and end-users linked to the health and well-being of users, including children 4.3.5.4.2 S4-1 – Policies related to consumers and end-users linked to continuity of service 4.3.5.5.2 S4-1 – Policies related to consumers and end-users linked to responsible marketing and information practices 4.3.5.6.1 S4-1 – Policies related to consumers and end-users linked to the opportunity as a trusted operator
S4-2	4.3.5.1.3 S4-2 – Processes for engaging with consumers and end-users about impacts linked to digital inclusion and equality 4.3.5.2.4 S4-2 – Processes for engaging with consumers and end-users about impacts linked to personal data protection and cybersecurity 4.3.5.3.3 S4-2 – Processes for engaging with consumers and end-users about impacts linked to the health and well-being of users, including children 4.3.5.4.3 S4-2 – Processes for engaging with consumers and end-users about impacts linked to continuity of service
S4-3	4.3.5.2.5 S4-3 – Processes to remediate the negative impact and channels for consumers and end-users to raise concerns linked to personal data protection and cybersecurity 4.3.5.3.4 S4-3 – Processes to remediate the negative impact and channels for consumers and end-users to raise concerns linked to the health and well-being of users, including children 4.3.5.4.4 S4-3 – Processes to remediate the negative impact and channels for consumers and end-users to raise concerns about continuity of service 4.3.5.5.3 S4-3 – Processes to remediate the negative impact and channels for consumers and end-users to raise concerns linked to responsible marketing and information practices
S4-4	4.3.5.1.4 S4-4 – Taking action on the material impact on consumers and end-users, and effectiveness of those actions linked to digital inclusion and equality 4.3.5.1.5 S4-4 – Taking action to pursue the opportunity related to digital inclusion and equality 4.3.5.2.6 S4-4 – Taking action on the material impact and risk related to consumers and end-users, and effectiveness of those actions linked to personal data protection and cybersecurity 4.3.5.3.5 S4-4 – Taking action on the material impact on consumers and end-users, and effectiveness of those actions linked to the health and well-being of users, including children 4.3.5.4.5 S4-4 – Taking action on the material impact and risk related to consumers and end-users, and effectiveness of those actions linked to continuity of service 4.3.5.5.4 S4-4 – Taking action to manage the material risk related to consumers and end-users, and effectiveness of those actions linked to responsible marketing and information practices 4.3.5.6.2 S4-4 – Taking action to pursue the material opportunity related to consumers and end-users, and effectiveness of those actions linked to the trusted operator
S4-5	4.3.5.1.6 S4-5 – Targets related to advancing positive impacts concerning digital inclusion and equality 4.3.5.2.7 S4-5 – Targets related to managing the material impact and risk concerning personal data protection and cybersecurity 4.3.5.3.6 S4-5 – Targets related to managing the material impact concerning the health and well-being of users, including children 4.3.5.4.6 S4-5 – Targets related to managing the material impact and risk concerning continuity of service 4.3.5.5.5 S4-5 – Targets related to managing the material risk concerning responsible marketing and information practices 4.3.5.6.3 S4-5 Targets related to managing the material opportunity as a trusted operator
ESRS G1	
ESRS 2 GOV-1	4.4.1 ESRS 2 GOV-1 – The role of the administrative, management and supervisory bodies
G1-1	4.4.2 G1-1 – Business conduct policies and corporate culture and G1-3 – Prevention and detection of corruption and bribery
G1-3	4.4.2 G1-1 – Business conduct policies and corporate culture and G1-3 – Prevention and detection of corruption and bribery
G1-4	4.4.3 G1-4 – Incidents of corruption or bribery
G1-5	4.4.4 G1-5 – Political influence and lobbying activities

Appendix 3: List of datapoints in cross-cutting and topical standards deriving from other legislation

Datapoints	SFDR	Pillar 3	Benchmarks Regulation	European Climate Law	Section of the sustainability statement
ESRS 2 GOV-1 Board's gender diversity paragraph 21 (d)	X		X		5.2.1.3
ESRS 2 GOV-1 Percentage of board members who are independent paragraph 21 (e)			X		5.2.1.2
ESRS 2 GOV-4 Statement on due diligence paragraph 30	X				4.1.2.4
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities paragraph 40 (d) i	X	X	X		not applicable
ESRS 2 SBM-1 Involvement in activities related to chemical production paragraph 40 (d) ii	X		X		not applicable
ESRS 2 SBM-1 Involvement in activities related to controversial weapons paragraph 40 (d) iii	X		X		not applicable
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco paragraph 40 (d) iv			X		not applicable
ESRS E1-1 Transition plan to reach climate neutrality by 2050 paragraph 14				X	4.2.2.1.1
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g)		X	X		4.2.2.1.1
ESRS E1-4 34 GHG emission reduction targets	X	X	X		4.2.2.3.1
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) paragraph 38	X				not applicable
ESRS E1-5 Energy consumption and mix paragraph 37	X				4.2.2.3.4
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43	X				not applicable
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions paragraph 44	X	X	X		4.2.2.3.4
ESRS E1-6 Gross GHG emissions intensity paragraphs 53 to 55	X	X	X		4.2.2.3.4
ESRS E1-7 GHG removals and carbon credits paragraph 56				X	4.2.2.3.5
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks paragraph 66			X		not disclosed
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a) ESRS E1-9 Location of significant assets at material physical risk paragraph 66 (c)		X			not disclosed
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes paragraph 67 (c)		X			not disclosed
ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities paragraph 69			X		not disclosed
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	X				not material
ESRS E3-1 Water and marine resources, paragraph 9	X				not material
ESRS E3-1 Dedicated policy paragraph 13	X				not material
ESRS E3-1 Sustainable oceans and seas paragraph 14	X				not material
ESRS E3-4 Total water recycled and reused paragraph 28 (c)	X				not material

Datapoints	SFDR	Pillar 3	Benchmarks Regulation	European Climate Law	Section of the sustainability statement
ESRS E3-4 Total water consumption in m³ per net revenue on own operations paragraph 29	X				not material
ESRS 2- IRO 1 – E4 paragraph 16, item a) i	X				not material
ESRS 2- IRO 1 – E4 paragraph 16 item b)	X				not material
ESRS 2- IRO 1 – E4 paragraph 16, item c)	X				not material
ESRS E4-2 Sustainable land/agriculture practices or policies paragraph 24 (b)	X				not material
ESRS E4-2 Sustainable oceans/seas practices or policies paragraph 24 (c)	X				not material
ESRS E4-2 Policies to address deforestation paragraph 24 (d)	X				not material
ESRS E5-5 Non-recycled waste paragraph 37 (d)	X				4.2.3.3.4
ESRS E5-5 Hazardous waste and radioactive waste paragraph 39	X				4.2.3.3.4
ESRS 2- SBM3 – S1 Risk of incidents of forced labor paragraph 14 (f)	X				4.3.2.1
ESRS 2- SBM3 – S1 Risk of incidents of child labor paragraph 14 (g)	X				4.3.2.1
ESRS S1-1 Human rights policy commitments paragraph 20	X				4.3.1.1
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organization Conventions 1 to 8, paragraph 21				X	4.3.1.1
ESRS S1-1 Processes and measures for preventing trafficking in human beings paragraph 22	X				4.3.1.2
ESRS S1-1 Workplace accident prevention policy or management system paragraph 23	X				4.3.2.4.1
ESRS S1-3 Grievance/complaints handling mechanisms paragraph 32 (c)	X				4.3.2.7
ESRS S1-14 Number of fatalities and number and rate of work-related accidents paragraph 88 (b) and (c)	X			X	4.3.2.8.6
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e)	X				4.3.2.8.6
ESRS S1-16 Unadjusted gender pay gap paragraph 97 (a)	X			X	4.3.2.8.7
ESRS S1-16 Excessive CEO pay ratio paragraph 97 (b)	X				4.3.2.8.7
ESRS S1-17 Incidents of discrimination paragraph 103 (a)	X				4.3.2.8.8
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD Guidelines paragraph 104 (a)	X			X	4.3.2.8.8
ESRS 2- SBM3 – S2 Significant risk of child labor or forced labor in the value chain paragraph 11 (b)	X				4.3.3.1
ESRS S2-1 Human rights policy commitments paragraph 17	X				4.3.1.3 4.3.3.2.1.1
ESRS S2-1 Policies related to value chain workers paragraph 18	X				4.3.3.2.1
ESRS S2-1 Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19	X			X	4.3.1.5
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organization Conventions 1 to 8, paragraph 19				X	4.3.1.5

Datapoints	SFDR	Pillar 3	Benchmarks Regulation	European Climate Law	Section of the sustainability statement
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36			X		4.3.1.5
ESRS S3-1 Human rights policy commitments paragraph 16			X		4.3.4.2.1.2
ESRS S3-1 Non-respect of UNGPs on Business and Human Rights, ILO principles and/or OECD guidelines paragraph 17	X		X		4.3.1.5
ESRS S3-4 Human rights issues and incidents paragraph 36	X				4.3.1.5
ESRS S4-1 Policies related to consumers and end-users paragraph 16	X				4.3.1.4
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 17	X		X		4.3.1.5
ESRS S4-4 Human rights issues and incidents paragraph 35	X				4.3.1.5
ESRS G1-1 United Nations Convention against Corruption paragraph 10 (b)	X				4.4.2.2
ESRS G1-1 Protection of whistleblowers paragraph 10 (d)	X				4.4.2.4
ESRS G1-4 Fines for violation of anti-corruption and anti-bribery laws paragraph 24 (a)	X		X		4.4.3
ESRS G1-4 Standards of anti-corruption and anti-bribery paragraph 24 (b)	X				4.4.3

Appendix 4: List of information incorporated in the sustainability statement by reference

Datapoint	Section of the Universal Registration Document
4.1.1.1 BP-1 – General basis for preparation of sustainability statements	3.3 <i>Consolidated Financial Statements</i> – Note 20 <i>List of main consolidated entities</i>
4.1.2 Governance	5.2 <i>Operation of the management and supervisory bodies</i>
4.1.2.1.2 Approval and oversight of actions	5.2.1.6. <i>Committees of the Board of Directors</i>
4.1.2.1.3 Impact, risks and opportunity management	2.1.1 <i>Group Audit, Control and Risk Management</i>
4.1.2.2 GOV-2 – Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	5.2.1.8 <i>Board and committee activities during the fiscal year</i>
4.1.2.3 GOV-3 – Integration of sustainability-related performance in incentive schemes	5.4 <i>Compensation and benefits paid to Directors, Officers and Senior Management</i>
4.1.2.5.1 General principles	2.1.1 <i>Group Audit, Control and Risk Management</i>
4.1.2.5.2 Risk-based approach	2.1.3.2 <i>Specific procedures for internal control of non-financial issues</i>
4.1.2.5.3 Strategy to hedge risks related to the process of producing sustainability information	2.1.3. <i>Control framework for non-financial risks</i>
4.1.3.1.1.1 Description of major product and/or service groups	3.1.2.1.1 <i>Revenues</i>
4.1.3.1.1.2 Description of major markets and geographical locations	1.1.1 <i>Group's main footprint and key figures</i>
4.1.3.1.1.3 Elements of the general strategy that relate to sustainability matters	1.2.3 <i>The Orange group strategy</i> 1.2.1 <i>Business model</i>
4.1.3.1.2 Value-creating business model	1.2.1 <i>Business model</i>
4.1.3.3 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model	1.2.1.1 <i>Integrated business model</i> 1.2.3 <i>The Orange group strategy</i>
4.2.2.1.1 E1-1 – Environmental and energy transition plan: mitigating and adapting	2.3 <i>Vigilance Plan</i> 5.2.2.3 <i>Executive Committee and Group governance committees</i>
4.2.2.2.1.3 Policies related to climate change adaptation	2.1.3.3 <i>Group security policy</i>
4.2.2.2.2.7 <i>Other initiatives related to climate change mitigation and energy</i>	2.1.3.1 <i>Corporate Social Responsibility governance – Appropriation of the Group's CSR challenges and commitments by all employees</i>
4.2.2.2.3.2 Analyzing costs	2.1.2.3 <i>Insurance</i>
4.2.2.2.4.1 Developing and proposing a catalog of offers and services related to climate change	1.4.4 <i>Orange Business</i>
4.2.2.3.4.6 MDR-M – Note on methodology for the assessment of Scope 3	3.3 <i>Consolidated Financial Statements</i> – <i>Consolidated income statement</i>
4.2.4 EU taxonomy	3.3 <i>Consolidated Financial Statements</i> – Note 1.2 <i>Group segment revenue</i> 3.1.2.1 <i>Group revenue</i> 3.3 <i>Consolidated Financial Statements</i> – Note 1.5 <i>Segment investments in the Consolidated Financial Statements</i> 3.1.5 <i>Financial indicators not defined by IFRS</i> 7.2.1 <i>Financial glossary</i>
4.3.2.3.2.2 Ensuring pay equity	5.4.1.3 <i>Compensation structure for the Chief Executive Officer and Chairman of the Board of Directors for 2025</i> 3.3 <i>Consolidated Financial Statements</i> – Note 6.3 <i>Share-based compensation</i> 6.2.1 <i>Distribution of capital and voting rights</i>
4.3.2.4.1.2 Group security policy	2.1.3.3 <i>Group security policy</i>
4.3.2.8.1.1 The Group's workforce	3.3. <i>Consolidated Financial Statements</i> – Note 6 <i>Employee benefits</i>
4.3.2.8.7 S1-16 – Compensation metrics	5.4.1.2. <i>Amount of compensation paid or allocated to Corporate Officers for 2025</i>
4.3.3.2.3 S2-3 – Processes to remediate negative impacts and channels for value chain workers to raise concerns	2.3 <i>Vigilance Plan</i>
4.3.3.2.4.2 Assessing and auditing suppliers on topics relating to respect for the human rights of workers	2.3 <i>Vigilance Plan</i>
4.3.5.1.4.1 Connecting and equipping	1.2.3 <i>The Orange group strategy</i>

Datapoint	Section of the Universal Registration Document
4.3.5.1.5.1 Offering inclusive services that complement connectivity	1.4.3 <i>Africa & Middle East</i> 1.2.3.8 <i>Mobile Financial Services</i> 1.4.4 <i>Orange Business</i>
4.3.5.2.1 ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model	2.1.3.3 <i>Group security policy</i>
4.4.1 ESRS 2 GOV-1 – The role of the administrative, management and supervisory bodies	2.1.3.6 <i>Ethics and compliance</i>
4.4.2.4 Group whistleblowing system	2.1 <i>Activity and Risk management framework</i>
4.4.2.5.1 Training tools and materials	5.2.1.3 <i>Application of the principle of diversity and balanced gender representation – Diversity of expertise on the Board</i>
4.4.2.8 Tax policy	3.3 <i>Consolidated Financial Statements – Note 10 Taxes</i> 3.3 <i>Consolidated Financial Statements – Note 20 List of main consolidated entities</i> 2.1.2.2 <i>Work relating to Financial Internal Control</i>

4.5 Report on the certification of sustainability information

Report on the certification of sustainability information and verification of the disclosure requirements under Article 8 of Regulation (EU) 2020/852

This is a translation into English of the statutory auditors' report on the certification of sustainability information and verification of the disclosure requirements under Article 8 of Regulation (EU) 2020/852 of the Company issued in French and it is provided solely for the convenience of English speaking users.

This report should be read in conjunction with, and construed in accordance with, French law and the H2A guidelines on Limited assurance engagement – Certification of sustainability reporting and verification of disclosure requirements set out in Article 8 of Regulation (EU) 2020/852.

Year ended December 31, 2025

To the Annual General Meeting of ORANGE,

This report is issued in our capacity as statutory auditors of ORANGE (hereinafter the "Entity"). It covers the sustainability information and the information required by Article 8 of Regulation (EU) 2020/852, relating to the year ended 31 December 2025 and included in Chapter 4 in the Group Management Report, entitled "Sustainability statement" (hereinafter the "Sustainability statement").

Our procedures, which relate to this information, have been performed in an evolving context characterized by uncertainties regarding the interpretation of the laws and regulations, and the development of established practices.

Pursuant to Article L. 233-28-4 of the French Commercial Code, the Entity is required to include the above-mentioned information in a separate section of the Group Management Report.

This information enables an understanding of the impact of the activity of the Group on sustainability matters, as well as the way in which these matters influence the development of the business of the Group, its performance and position. Sustainability matters include environmental, social and Corporate Governance matters.

Pursuant to Article L. 821-54 paragraph II of the aforementioned Code our responsibility is to carry out the procedures necessary to issue a conclusion, expressing limited assurance, on:

- compliance with the requirements set out in the sustainability reporting standards adopted by the European Commission pursuant to Article 29 b of Directive (EU) 2013/34 of the European Parliament and of the Council of 26 June 2013, as amended by Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 (hereinafter "ESRS" for *European Sustainability Reporting Standards*) of the process implemented by the Entity to determine the information reported, including, where applicable, the obligation to consult the social and economic committee provided for in the sixth paragraph of Article L. 2312-17 of the Labor Code;
- compliance of the sustainability information included in the Sustainability statement with the provisions of Article L. 233-28-4 of the French Commercial Code, including ESRS; and
- compliance with the reporting requirements set out in Article 8 of Regulation (EU) 2020/852.

This engagement is carried out in compliance with the ethical rules, including independence, and quality control rules prescribed by the French Commercial Code.

It is also governed by the H2A guidelines on *Limited assurance engagement – Certification of sustainability reporting and verification of disclosure requirements set out in Article 8 of Regulation (EU) 2020/852*.

In the three separate sections of the report that follow, we present, for each of the sections of our engagement, the nature of the

procedures that we carried out, the conclusions that we drew from these procedures and, in support of these conclusions, the elements to which we paid particular attention and the procedures that we carried out with regard to these elements. We draw your attention to the fact that we do not express a conclusion on any of these elements taken individually and that the procedures described should be considered in the overall context of the formation of the conclusions issued in respect of each of the three sections of our engagement.

Finally, where deemed necessary to draw your attention to one or more disclosures of sustainability information provided by the Entity in the Group Management Report, we have included an emphasis of matter paragraph hereafter.

Limits of our engagement

As the purpose of our engagement is to express limited assurance, the nature (choice of techniques), extent (scope) and timing of the procedures are less than those required to obtain reasonable assurance.

This engagement does not provide guarantee regarding the viability or the quality of the management of the Entity, in particular it does not provide an assessment, of the relevance of the choices made by the entity in terms of action plans, targets, policies, scenario analyses and transition plans, which would go beyond compliance with the ESRS reporting requirements.

Furthermore, as forward-looking information is inherently uncertain, actual future outcomes may differ, sometimes significantly, from the forward-looking information presented in the Group Management Report.

Our engagement does, however, allow us to express conclusions regarding the entity's process for determining the sustainability information to be reported, the sustainability information itself, and the information reported pursuant to Article 8 of Regulation (EU) 2020/852, as to the absence of identification or, on the contrary, the identification of errors, omissions or inconsistencies of such importance that they would be likely to influence the decisions that readers of the information subject to this engagement might make.

In addition, the comparative information relating to the year 2023 has not been the subject of a sustainability information certification report within the meaning of Article L821-54 of the French Commercial Code.

It does not cover the entity's compliance with the legal and regulatory provisions relating to the vigilance plan published pursuant to Article L. 225-102-1 of the French Commercial Code.

Sustainability information and the information required under Article 8 of Regulation (EU) No 2020/852 may be subject to inherent uncertainty arising from the state of scientific knowledge and from the quality of the external data used. Certain information is sensitive to the methodological choices, assumptions and/or estimates applied in preparing it and presented in the Group Management Report.

Compliance with the requirements set out in the ESRS of the process implemented by the Entity to determine the information reported, including the obligation to consult the social and economic committee provided for in the sixth paragraph of Article L. 2312-17 of the French Labor Code

Nature of procedures carried out

Our procedures consisted in verifying that:

- the process defined and implemented by the Entity, including the obligation to consult the social and economic committee provided for in the sixth paragraph of Article L. 2312-17 of the French Labor Code, has enabled it, in accordance with the ESRS, to identify and assess its impacts, risks and opportunities related to sustainability matters, and to identify the material impacts, risks and opportunities that lead to the publication of information disclosed in the Sustainability statement, and
- the information provided on this process is also in line with the ESRS.

Conclusion of the procedures carried out

On the basis of the procedures we have carried out, we have not identified any material errors, omissions or inconsistencies regarding the compliance of the process implemented by the Entity with the ESRS.

Elements that received particular attention

We set out below the elements that have been the subject of particular attention in relation to our assessment of compliance with the ESRS of the process implemented by the Entity to determine the information reported.

Information on the identification of stakeholders and impacts, risks and opportunities as well as the assessment of impact materiality and financial materiality is provided in section “4.1.4.1 IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities” of the Sustainability statement.

→ Concerning the identification of stakeholders

We obtained an understanding of the analysis conducted by the Entity to identify:

- stakeholders, who may affect or be affected by entities within the scope of information, by their direct or indirect business activities and relationships in the value chain;
- primary users of sustainability statements (including primary users of financial statements).

We interviewed management and other within the Entity as appropriate and inspected available documentation. Our work consisted primarily of:

- assessing the consistency of the primary stakeholders identified by the Entity in view of the nature of its activities and its geographical location, taking into account its business relationships and its value chain;
- assessing the appropriateness of the description given in the section “4.1.3.2.2 Stakeholder consultation mechanisms” of the Sustainability statement, in particular, with regard to the methods used by the Entity to collect information on the interests and views of stakeholders;
- exercising our critical thinking skills to assess the representative nature of the stakeholders identified by the Entity.

→ Concerning the identification of impacts, risks and opportunities

We obtained an understanding of the process implemented by the Entity to identify actual or potential impacts – both negative

and positive – risks and opportunities (IROs), in relation to the sustainability matters mentioned in paragraph AR 16 of ESRS 1, “Application requirements”, and where applicable, those specific to the Entity, as presented in section “4.1.4.1 IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities” of the Sustainability statement.

In particular, we assessed the approach taken by the Entity to determine its impacts and dependencies, which may be a source of risks or opportunities, including the dialogue undertaken, where appropriate, with stakeholders.

We obtained an understanding of the presentation made by the Entity regarding the mapping of identified IROs, including a description of their distribution within the Entity’s own operations and its value chain, as well as their time horizon (short, medium or long term), and assessed the consistency of this mapping with our knowledge of the Entity and, where applicable, with the risk analyses conducted by the Group’s entities.

We have:

- assessed the approach used by the Entity to collect information in respect of subsidiaries;
- assessed how the Entity has taken into account the list of sustainability matters set out in ESRS 1 (AR 16) in its analysis;
- assessed the consistency of actual and potential impacts, risks and opportunities identified by the Entity with available sector analyses;
- assessed the consistency of the actual and potential impacts, risks and opportunities identified by the Entity with our knowledge of the Entity;
- assessed how the Entity has taken into account the different time horizons, particularly with regard to climate issues;
- assessed whether the Entity has taken into account the risks and opportunities that may arise from both past and future events as a result of its own operations or business relationships, including the actions taken to manage certain impacts or risks.

→ Concerning the assessment of impact materiality and financial materiality

Through interviews with Corporate Social Responsibility and Environmental departments and the Finance & Performance department and by inspecting the available documentation, we obtained an understanding of the process implemented by the Entity to assess impact materiality and financial materiality and assessed its compliance with the criteria defined in ESRS 1.

In particular, we assessed the way in which the Entity has established and applied the materiality criteria of the ESRS 1 standard, including the setting of thresholds, in order to determine the material information reported:

- under the indicators relating to the material IROs identified in accordance with the relevant thematic ESRS standards;
- as entity-specific information.

In performing our procedures, we primarily:

- assessed the consistency of the thresholds thus determined with our knowledge of the Entity;
- verified that all impacts (positive or negative), actual or potential risks and opportunities identified by the Entity have been assessed;
- assessed whether the Entity has assessed the IROs independently of any mitigation measures;
- assessed the appropriateness of the information provided in the section “4.1.4.1 IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities” of the Sustainability statement.

Compliance of the sustainability information included in the Sustainability statement with the provisions of Article L. 233-28-4 of the French Commercial Code, including the ESRS

Nature of procedures carried out

Our procedures consisted in verifying that, in accordance with legal and regulatory requirements, including the ESRS:

- the disclosures provided enable an understanding of the general basis for the preparation and governance of the sustainability information included in the Sustainability statement, including the basis for determining the information relating to the value chain and the exemptions from disclosures used;
- the presentation of this information ensures its readability and understandability;
- the scope chosen by the Entity for providing this information is appropriate; and
- on the basis of a selection, based on our analysis of the risks of non-compliance of the information provided and the expectations of users, that this information does not contain any material errors, omissions or inconsistencies, i.e. that are likely to influence the judgement or decisions of users of this information.

Conclusion of the procedures carried out

Based on the procedures we have carried out, we have not identified material errors, omissions or inconsistencies regarding the compliance of the sustainability information included in the Sustainability statement with the provisions of Article L. 233-28-4 of the French Commercial Code, including the ESRS.

Elements that received particular attention

Below we present the elements that have been the subject of particular attention on our part regarding the compliance of the sustainability information included in sections 4.1 to 4.4 of the Sustainability statement with the provisions of Article L. 233-28-4 of the French Commercial Code, including the ESRS.

→ Information provided in application of environmental standard ESRS E1

Information reported in relation to climate change (ESRS E1) is mentioned in section 4.2.2 of the Sustainability statement.

We set out below the elements that have been the subject of particular attention in relation to our assessment of the compliance of this information with the ESRS.

Assessing, through interviews conducted with the Group's Corporate Social Responsibility (CSR) Department and in particular the Environmental and Energy Transition Department, whether the description of the policies, actions and targets implemented by the Entity addresses the following areas: climate change mitigation, climate change adaptation, energy consumption and energy mix.

With regard to the information published by the Entity on the **greenhouse gas (GHG) emissions**:

- we obtained an understanding of the greenhouse gas emissions inventory protocol used by the Entity, and checked its application, for a selection of emissions categories and sites, for Scope 1 and Scope 2;
- with regard to Scope 3 emissions, we assessed:
 - the justification for the inclusion and exclusion of the various categories and the transparency of the disclosures provided in this respect,
 - the process of gathering information on which disclosures were based;

- we assessed the appropriateness of the emission factors used, the consistency of their updating where appropriate, as well as the calculation and extrapolation assumptions, taking into account the uncertainty inherent in the state of scientific or economic knowledge and the quality of the external data;
- through inquiries with management we obtained an understanding of the main changes in the Entity's activities during the financial year that could have an impact on the greenhouse gas emissions assessment;
- we reconciled physical data (such as energy consumption), on a sample basis, to the underlying data used to draw up the greenhouse gas emissions assessment and traced to supporting documents;
- with regard to the estimates that we considered to be critical, used by the Entity to prepare its greenhouse gas emissions assessment:
 - through interviews with management, we obtained an understanding of the method used to calculate the estimate and the information sources on which the estimates were based,
 - we assessed whether the methods were applied consistently or whether there were any changes since the previous period, and whether these changes were appropriate;
- we have implemented analytical procedures;
- we verified the accuracy of the calculations used to prepare this information.

With regard to our procedures regarding the **Transition Plan** for climate change mitigation, our work mainly consisted of:

- assessing whether the information published in the transition plan meets ESRS E1 requirements with an appropriate description of the plan's underlying key assumptions, it being understood that we are not required to express a conclusion on the appropriateness or the level of ambition of the transition plan's objectives;
- reviewing the process for collecting and compiling the information published in the sustainability statement;
- assessing the consistency between them of the main information provided under the transition plan, in particular with regard to decarbonization levers and associated actions;
- assessing the consistency of the analyses relating to the quantification of the financial resources associated with the transition plan with the current expenditure from the accounting and budgetary information systems and the projected expenditure for each decarbonization lever, in particular for the most mature ones;
- inspecting the available underlying documentation;
- assessing whether this transition plan reflects the commitments made by the Entity as declared in the context of its climate strategy.

→ Information provided in application of environmental standard ESRS E5

Circular economy disclosures (ESRS E5) are reported in section 4.2.3 of the Sustainability Statement.

We set out below the elements that have been the subject of particular attention in relation to our assessment of the compliance of this information with the ESRS.

Assessing, through interviews conducted with persons we considered appropriate, whether the description of the policies and actions implemented by the Entity addresses the areas of Resources inflows.

With regard to the information reported by the Entity in respect of the **weights of critical metals** :

- we have become aware of the collection and compilation process for the processing of qualitative and quantitative information aimed at the compliance of the information published;
- we assessed the appropriateness of the data sources used on metallic compositions and equipment volumes, as well as the calculation and extrapolation assumptions given the uncertainty inherent in the state of scientific or economic knowledge and the quality of the data used;
- we reconciled the underlying data used to develop critical metal weights and equipment volumes with supporting documents on a sampling basis.

→ **Information provided in application of social standard ESRS S1**

The information published in respect of the health and safety of the Entity's personnel (ESRS S1) is mentioned in sections 4.3.2.4 and 4.3.2.8 of the Sustainability State.

We set out below the elements that have been the subject of particular attention in relation to our assessment of the compliance of this information with the ESRS.

On the basis of the interviews conducted with the people concerned, in particular the Human Resources Department, we assessed whether the description of the policies and actions put in place by the Entity covers the areas of health and safety.

With regard to the information presented by the Entity in respect of the health and safety indicators:

- we have become aware of the methodology for establishing and reporting accident data;
- we reconciled, on a sampling basis, the underlying data used to develop the health and safety indicators with the supporting documents;
- we checked the arithmetic accuracy of the calculations used to establish this information.

Paris-La Défense, March 4th, 2026

The Statutory Auditors

Deloitte & Associés

Christophe PATRIER
Partner

Julien RIVALS
Partner

KPMG S.A.

Jacques PIERRE
Partner

Mathilde FIMAYER
Partner

Compliance with the reporting requirements set out in Article 8 of Regulation (EU) 2020/852

Nature of procedures carried out

Our procedures consisted in verifying the process implemented by the Entity to determine the eligible and aligned nature of the activities of the entities included in the consolidation.

They also involved verifying the information reported pursuant to Article 8 of Regulation (EU) 2020/852, which involves checking:

- the compliance with the rules applicable to the presentation of this information to ensure that it is readable and understandable;
- on the basis of a selection, the absence of material errors, omissions or inconsistencies in the information provided, i.e. information likely to influence the judgement or decisions of users of this information.

Conclusion of the procedures carried out

Based on the procedures we have carried out, we have not identified any material errors, omissions or inconsistencies relating to compliance with the requirements of Article 8 of Regulation (EU) 2020/852.

Elements that received particular attention

Based on our assessment, we determined that there were no such elements to communicate in our report.

5 Corporate Governance

5.1	Composition of management and supervisory bodies	486
5.1.1	Board of Directors	486
5.1.2	Corporate Officers	491
5.1.3	Executive Committee	492
5.1.4	Information on Directors, Officers and Senior Management	494
5.2	Operation of the management and supervisory bodies	499
5.2.1	Operation of the Board of Directors	499
5.2.2	Operation of General Management	512
5.3	Reference to a Code of Corporate Governance	513
5.4	Compensation and benefits paid to Directors, Officers and Senior Management	513
5.4.1	Report of the Board of Directors on compensation and benefits paid to Corporate Officers	513
5.4.2	Board of Directors' report on Directors' compensation	524
5.4.3	Compensation of members of the Executive Committee	526

The term of office as Independent Director of Jacques Aschenbroich, also Chairman of the Board of Directors of Orange, will expire at the close of the Shareholders' Meeting called to approve the financial statements for the fiscal year ended December 31, 2025, i.e. on May 19, 2026.

As of July 2025, in view of the expiration of this term of office and within the framework of the succession plan for the Chairman of the Board of Directors, and in accordance with Article 5 of the Board's Internal Guidelines, the Governance and Corporate Social and Environmental Responsibility Committee (GCSERC) asked the Board of Directors to create a special committee, focused on this succession process.

It suggested that the special committee enlist the services of an external consultant.

The special committee focused mainly on defining the ideal candidate profile, reviewing the panel of individuals identified by or with the external consultant who may fit the ideal candidate profile, specifically handling unsolicited applications or those submitted by members of the Board of the Directors, and, lastly, interviewing some of these individuals who might be able to meet the challenges and criteria of the position of Chairman of the Board of Directors of Orange. Among these criteria were primarily experience in corporate leadership and governance within an international context, while possessing an in-depth knowledge of the French ecosystem, and, above all, the ability to maintain the current positive momentum with both the Board of Directors and its stakeholders, as well as with the Chief Executive Officer, in order to uphold the high level of governance at Orange as reflected in the Board's assessment (see Section 5.2.1.9, Periodic Review of the Operation of the Board of Directors and its Committees).

This special committee, which convened on 8 occasions, including two sessions specifically devoted to interviewing candidates, has also interacted on numerous occasions with the Board of Directors and the Chief Executive Officer and reported on its work to the

Board on march 20th 2026. This work followed on from the work done on the succession plan in place for when the Chairman is unavailable, which is distinct from that of the Chief Executive Officer but remains closely linked to it since the separation of the roles of Chairman and Chief Executive Officer in April 2022.

The process of finding and identifying an Independent Director finally led the Board of Directors, which discussed the matter and then decided, on March 20th, 2026:

- (i) To appoint Frédéric Sanchez, independent director of Orange since 2020 and current Chair of its CST, as Chairman of the Board of Directors, in light of his profile as an executive leader with international experience and his in-depth knowledge of Orange's affairs and the telecommunications sector. This recommendation also takes into account his strong availability and active participation in Board discussions and in shaping the Group's strategy through the CST, as demonstrated consistently by Frédéric Sanchez in his capacity as an Orange director. His term would begin at the conclusion of Orange's Annual Shareholders' Meeting on May 19, 2026, and
- (ii) to ask the same Shareholders' Meeting the renewal of Jacques Aschenbroich's term as director for a period of four years, in order to continue benefiting from his recognized experience in governance of large companies, particularly in the context of Orange's transformation, as well as his expertise in managing major strategic projects for the Group.

In parallel with this process, the Board decided, on the proposal of the GCSERC, to ask the same Shareholders' Meeting to reappoint Valérie Beaulieu as Independent Director for another four-year term.

Orange's current management structure, separating the roles of Chairman and the Chief Executive Officer, has been confirmed by the Board of Directors and is in line with the wishes of various shareholding stakeholders of the company.

5.1 Composition of management and supervisory bodies

5.1.1 Board of Directors

On February 18, 2026, the date on which the Board of Directors approved the Report on Corporate Governance, the Board comprised 14 individually appointed members: seven Independent Directors elected by Orange's Shareholders' Meeting, including the

Chairman of the Board of Directors, the non-independent Chief Executive Officer and the only executive member of the Board, three Directors representing the public sector, one of whom is appointed by ministerial decree, and three Directors elected by employees.

Chairman of the Board of Directors

	Date first appointed	Term ending
Jacques Aschenbroich	May 19, 2022	At the close of the 2026 Shareholders' Meeting

Jacques Aschenbroich, born in 1954, has been Chairman of the Orange Board of Directors since May 19, 2022. He was Director and Chief Executive Officer of the Valeo group from March 20, 2009 until February 18, 2016, Chairman and Chief Executive Officer until January 26, 2022, then Chairman of the Valeo Board of Directors from January 27, 2022 until December 31, 2022. He is now Honorary Chairman of Valeo. Before joining Valeo, he held several positions in the French government and served in the Prime Minister's office in 1987 and 1988. He then pursued a business career at the Saint-Gobain group from 1988 to 2008. Having managed subsidiaries in Brazil and Germany, he became Managing Director of the flat glass division of Compagnie de Saint-Gobain and went on to become Chairman of Saint-Gobain Vitrage

in 1996. As Deputy Chief Executive Officer of Compagnie de Saint-Gobain from October 2001 to December 2008, he managed flat glass and high-performance materials from January 2007 and, as the Director of Saint-Gobain Corporation and General *Delegate* to the United States and Canada, he directed the Group's operations in the United States from September 1, 2007. He is also a Director and Chairman of the Governance Committee of BNP Paribas, Lead Director of TotalEnergies and President of the French-American Foundation France. Jacques Aschenbroich is an Ingénieur diplômé du Corps des Mines. Jacques Aschenbroich is a Commander of the French Legion of Honor and an Officer of the French Order of Merit. He is a French national.

Chief Executive Officer and Non-Independent Director

	Date first appointed	Term ending
Christel Heydemann	July 26, 2017 ⁽¹⁾	At the close of the 2028 Shareholders' Meeting

(1) Co-opted as Director by the Board of Directors on July 26, 2017 to replace José-Luis Durán. Term of office ratified by the Shareholders' Meeting of May 4, 2018 and renewed by the Shareholders' Meetings of May 19, 2020 and May 22, 2024. Based on the recommendation of the GCSERC, and over and above the criteria set out in Article 10.5 of the Afepe-Medef Code, the Board of Directors' Meeting of February 16, 2022 deemed that Christel Heydemann, appointed Chief Executive Officer with effect from April 4, 2022, could no longer be considered an Independent Director.

Christel Heydemann, born in 1974, was appointed Chief Executive Officer of the Orange group on April 4, 2022. She began her career in 1999 at Alcatel, where she held various management positions. In 2011, she was promoted to Director of Human Resources and Transformation and member of the Executive Committee. She joined Schneider Electric in 2014. In 2017, she became Executive Director France Operations of Schneider Electric and member of Schneider Electric's Executive Committee. In 2021, she was named

Director Europe Operations, a position she held until the beginning of 2022 when she became Chief Executive Officer of the Orange group, having served as a member of its Board of Directors since 2017. She is a graduate of École Polytechnique and École Nationale des Ponts et Chaussées. Christel Heydemann is a Knight of the French Legion of Honor and an Officer of the French Order of Merit. She is a French national.

Independent Directors

		Date first appointed	Term ending
Jacques Aschenbroich	Chairman of the Board of Directors	May 19, 2022 ⁽¹⁾	At the close of the 2026 Shareholders' Meeting
Valérie Beaulieu	Member of the Audit Committee	May 19, 2022	At the close of the 2026 Shareholders' Meeting
Alexandre Bompard	Member of the Strategy and Technology Committee	December 7, 2016 ⁽²⁾	At the close of the 2027 Shareholders' Meeting
Gilles Grapinet	Chairman of the Audit Committee	May 23, 2023	At the close of the 2027 Shareholders' Meeting
Anne-Gabrielle Heilbronner	Chairwoman of the GCSERC	May 21, 2019 ⁽³⁾	At the close of the 2027 Shareholders' Meeting
Momar Nguer	Member of the GCSERC	May 23, 2023	At the close of the 2027 Shareholders' Meeting
Frédéric Sanchez	Chairman of the Strategy and Technology Committee	May 19, 2020	At the close of the 2028 Shareholders' Meeting

(1) Appointed Director by the Shareholders' Meeting of May 19, 2022 and appointed Chairman of the Board of Directors by the Board of Directors' Meeting held at the close of the Shareholders' Meeting of May 19, 2022.

(2) Co-opted by the Board of Directors on December 7, 2016 to replace Bernard Dufau. Term of office ratified by the Shareholders' Meeting of June 1, 2017 and renewed by the Shareholders' Meetings of May 21, 2019 and May 23, 2023.

(3) Term of office renewed by the Shareholders' Meeting of May 23, 2023.

Valérie Beaulieu, born in 1967, has been Chief Growth & Innovation Officer of ManpowerGroup since August 1, 2025. Valerie Beaulieu, built her career in Tech where she spent more than 30 years, in the United States, Europe and Asia. She began her career in 1991 at ECS, a Société Générale subsidiary specializing in the leasing of large information systems, where she stayed until 1996. As a member of the Executive Committee, she played a strategic role in the merger between ECS and Akena, which became the European leader in business computing in 1995. She then spent more than 20 years at Microsoft, where she led the marketing department

in Europe, then managed sales for small and medium business and all partners before becoming Chief Operating Officer of the Advertising division in the United States in 2012. In that role, she was responsible for operations and was the main architect of the partnerships with Yahoo and AOL. After seven years in the Consumer Division, she became General Manager of Small and Midmarket Solutions and Partners in Asia-Pacific before serving, from 2018 to 2020, as Chief Marketing Officer for Microsoft's US subsidiary, representing 50% of the Group's worldwide revenue. At the end of 2020, Valérie joined the Executive Committee of the

Adecco group, the global leader in HR solutions, as Chief Sales and Marketing Officer. She is also President of Pontoon Solutions, a subsidiary of the Group based in the United States. She will be a key architect of the revitalization of key accounts and of the Group's first GenAI partnership. In the summer of 2025, she joined ManpowerGroup as Chief Growth & Innovation Officer, based in Paris, where she leads global commercial development and transformation, including the integration of generative AI into the Group's strategy and the development of operational models. Valérie Beaulieu has been a French Foreign Trade Advisor and a member of the Board since 2015, in charge of innovation in Switzerland, and in Seattle and Singapore. She is also a member of the French Tech Advisory Board. Until 2022, she was a Director and member of the Audit and Risk Committee of ISS A/S, one of the world leaders in facility management. She holds a master's degree in English from the University of Haute-Bretagne, a diploma in International Trade, a certificate in Business Leadership from the London Business School, and a certificate in Private Equity/VC from Harvard Business School. She is a French national.

Alexandre Bompard, born in 1972, is a graduate of the Institut d'Études Politiques de Paris. He holds a master's degree in Public Law and a postgraduate degree in Economics from the École Nationale d'Administration (ENA), where he was a member of the "Cyrano de Bergerac" class. After graduating from the ENA, Alexandre Bompard was posted to the Inspectorate General of Finance (1999–2002). Thereafter, he became Technical Advisor to François Fillon, then Minister of Social Affairs, Labor and Solidarity (April–December 2003). From 2004 to 2008, Alexandre Bompard held several roles within the Canal+ group: Chief of Staff to Chairman Bertrand Meheut (2004–2005), then Director for Sports and Public Affairs (June 2005 to June 2008). In June 2008, he was appointed Chairman and Chief Executive Officer of Europe 1 and Europe 1 Sport. In January 2011, he joined the Fnac group as Chairman and Chief Executive Officer. On June 20, 2013, Alexandre Bompard led Fnac's initial public offering. In fall 2015, Fnac launched a takeover bid on the Darty group and, on July 20, 2016, Alexandre Bompard became Chairman and Chief Executive Officer of the new entity made up of Fnac and Darty. Alexandre Bompard has been the Chairman and Chief Executive Officer of Carrefour since July 18, 2017. In addition, since September 8, 2017, he has served as Chairman of the Carrefour corporate foundation. Alexandre Bompard has been a Director of the French Political Sciences Foundation (Fondation des Sciences Politiques) since 2021 and of the French Association of Private Enterprises (Association Française des Entreprises Privées – AFEP) since 2022. He has been Chairman of the French Trade and Retail Federation (Fédération Française du Commerce et de la Distribution – FCD) since August 2023. Alexandre Bompard is also a Knight of the French Legion of Honor, the French Order of Merit and the French Order of Arts and Letters. He is a French national.

Gilles Grapinet, born in 1963, joined the Inspectorate General of Finance in 1992 after graduating from École nationale d'administration (ENA). In 1996 he joined the General Tax Directorate (DGI) where, after heading the management control and transformation department, he was appointed Director of Information Systems and Strategy, responsible in particular for France's Copernic program (digital transformation of tax administration and overhaul of the DGI's information and payment systems). From 2003 to the end of 2004, he was economic and financial advisor to the Prime Minister, before going on to serve as Chief of Staff to the Minister of the Economy, Finance and Industry from 2005 to May 2007. In September 2007 he joined the Executive Committee of the international banking group Crédit Agricole SA, first as director of strategy and then as head of payment systems and services. In 2008 he joined the international IT services group Atos where he was appointed Senior Executive Vice President in charge of global functions, global sales and consulting. He served as Chief Executive Officer of Worldline from 2013 to 2024 and oversaw the successful partial listing of this Atos group subsidiary in June 2014 when it had a market capitalization of approximately 2 billion euros. Since then, Worldline has undergone an ambitious

expansion, acquiring Equens in 2016, SIX Payment Services in 2018 and Ingenico in 2020. Worldline, which became completely independent of Atos on May 3, 2019, has established itself as one of the leading electronic payment services companies in Europe and was part of the CAC 40 index until 2024. Until June 2022, Gilles Grapinet was also the first Chairman and founding member of the European Digital Payments Industry Alliance (EDPIA), the body that represents the main payment services companies in Europe. He chaired the Supervisory Board of Younited, an ACPR-approved "fintech" banking institution specializing in digital consumer credit, until its sale to Iris Financials in December 2024. He currently serves on it as an independent director. Gilles Grapinet is France's Chevalier de la Légion d'Honneur. He is a French national.

Anne-Gabrielle Heilbronner, born in 1969, is Secretary General of Publicis Groupe. She is in charge of human resources, procurement, legal affairs, compliance and governance, insurance and the internal audit and control functions and risk management. She has input into all strategic decisions regarding the Group's transformation. She began her career as a Financial Inspector before joining the Treasury Department as Deputy Manager of Social Housing Financing. She worked at Euris from 2000 to 2004 as Head of Corporate Finance in charge of all financial operations for Euris and Casino. Having contributed to EDF's initial public offering strategy, she then held the positions of Chief of Staff (2004–2005) and Special Adviser (2005–2007) respectively with the French Secretary of State for the Reform of State and then with the Ministry for Foreign Affairs. Director of Internal Audit and Risk Management at SNCF (2007–2010), where she developed and strengthened the role of the audit and compliance functions (ethics, fraud prevention, etc.), she then became Senior Banker and Managing Director at Société Générale Corporate and Investment Banking, in charge of a portfolio of listed companies. She joined Publicis Groupe in 2012. Anne-Gabrielle Heilbronner is a Financial Inspector, an alumna of the École Nationale d'Administration (ENA), and a graduate of ESCP-Europe and of the Institut d'Études Politiques in Paris. She also holds a master's degree in Public Law and a postgraduate diploma in Tax Law and Public Finance. Since November 2024, Anne-Gabrielle Heilbronner has been President of the Aspen Institute in France. Anne-Gabrielle Heilbronner is a Knight of the French Legion of Honor. She is a French national.

Momar Nguer, born in 1956, former member of TotalEnergies' Executive Committee, is Chief Executive Officer of Mnguer Advisory SAS. After starting his career in the Finance Department of Hewlett Packard France, he joined the Total group in 1984 where he held several positions. He was Sales Director of Total Raffinage Marketing Senegal from 1985 to 1990, then became Network and Consumer Director of Total Raffinage Marketing Africa between 1991 and 1995, after which he became Managing Director of Total Raffinage Marketing in Cameroon and Kenya until 2000. On his return to France, he was appointed Director of East Africa and the Indian Ocean and then Managing Director Aviation of Total Refining Marketing. In 2012, he became Director for Africa & Middle East, member of the Management Committee and then of the Performance Committee of the Total Group before joining the Executive Committee as Managing Director of the Marketing & Services branch. Momar Nguer has been a member of the Board of Directors and Chairman of the Audit Committee of Lafarge Holcim Morocco and Chairman of the Africa Committee of Medef International. He was also founding President of the French Business Club of Kenya. A graduate of Essec and holder of a Master's degree in international law, Momar Nguer is a Knight of the French Legion of Honor. He has dual Senegalese and French nationality.

Frédéric Sanchez, born in 1960, is Chairman of the Fives group. He began his career at Renault in 1985 in Mexico and the US, before joining Ernst & Young as Senior Manager in late 1987. In 1990, he joined the Fives-Lille group, where he held various positions before becoming Chief Financial Officer in 1994, then Chief Executive Officer in 1997, and finally Chairman of the Management Board in 2002. Fives – the new name of Compagnie de Fives-Lille since 2007 – became a simplified joint stock company (société par actions simplifiée – SAS) in 2018, headed by Frédéric Sanchez as Chairman.

Under his leadership, Fives has accelerated its development by strengthening its international presence and portfolio of activities through major acquisitions and the opening of regional offices in Asia, Latin America and the Middle East. In addition, Frédéric Sanchez is Chairman of MEDEF International, and Chairman of the France-United Arab Emirates and France-Japan business councils of MEDEF International. He is also a member of the Supervisory Boards of STMicroelectronics NV and Théa Holding SAS, and a Director of Bureau Veritas SA. Finally, he is Honorary Chairman

of the Alliance Industrie du Futur (Industry of the Future Alliance) of the Conseil national de l'industrie (National Industry Council – CNI) and Chairman of the network of French chambers of commerce and industry abroad (CCI France International – CCI FI). Frédéric Sánchez is a graduate of the École des Hautes Études Commerciales (HEC 1983) and Institut d'Études Politiques in Paris (1985), and holds a post-graduate diploma in Economics from the University of Paris-Dauphine (1984). He is a French national.

Directors representing the public sector

		Date first appointed	Term ending
Bpifrance Participations ⁽¹⁾ represented by Thierry Sommelet ⁽²⁾	Member of the Strategy and Technology Committee	May 28, 2013	At the close of the 2029 Shareholders' Meeting
Anne Lange ⁽³⁾	Member of the GCSERC	May 27, 2015	At the close of the 2027 Shareholders' Meeting
Céline Fornaro ⁽⁴⁾	Member of the Audit Committee	March 24, 2023	March 24, 2027

(1) A public financing and investment group for companies, resulting from the merger of OSEO, CDC Entreprises, FSI and FSI Régions, appointed by the Shareholders' Meeting.

(2) Appointed as permanent representative from January 10, 2021 to replace Nicolas Dufourcq.

(3) Appointed by the Shareholders' Meeting on the basis of a proposal by the French government and the Board of Directors. Term of office renewed by the Shareholders' Meeting of May 23, 2023.

(4) By ministerial order dated March 24, 2023, Céline Fornaro was appointed member of the Board of Directors of Orange as representative of the French State, in replacement of Stéphanie Besnier.

Thierry Sommelet, born in 1969, is a Director, member of the Management Committee and Head of Technology, Media and Telecoms of the growth capital department of Bpifrance. Thierry Sommelet has nearly 20 years' experience in private and public investment in the technology, media and telecommunication sectors. He began his career in 1992 in the capital markets at Crédit Commercial de France in Paris, then in New York. After leading the team of financial engineers at Renaissance Software (SunGard group) in Los Altos in the United States and serving as Deputy Chief Executive Officer of InfosCE in 2001, he joined the Digital Investments and Equity Department at Caisse des Dépôts et Consignations in 2002, and subsequently took charge of that unit in 2007. After joining the Fonds Stratégique d'Investissement in 2009, Thierry Sommelet joined the teams of Bpifrance Investissement when it was created in 2013. He represents Bpifrance on the Boards of Directors or Supervisory Boards of Worldline Group SA and Vantiva SA, both listed on Euronext Paris, as well as on the Supervisory Board of Idemia SAS. Thierry Sommelet is a graduate of the École Nationale des Ponts et Chaussées in Paris and holds an MBA from INSEAD. He is a French national.

Anne Lange is an entrepreneur and investor in the new technology sector and a director of large companies. Anne Lange began her career in 1994 working in the Prime Minister's office where she headed the government department for State control of public broadcasting. In 1998, she joined Thomson as Head of Strategic Planning, before becoming Head of the Europe ebusiness Department in 2000. In April 2003, Anne Lange was appointed General Secretary for the Internet rights forum, an agency of the Prime Minister's office. From 2004 to 2014, she successively worked as Vice-President of Europe Public Sector, Senior Executive

Director of Global Public Sector & Media Operations (based in the US) and Senior Executive Director of Innovation for the Internet Business Solutions group at Cisco. She decided to quit Cisco to create her own start-up, the software company, Mentis, of which she was Chief Executive Officer until 2018, innovating in the field of the Internet of Things, the Cloud and Big Data. Since then, Anne Lange has divided her professional activities between directorships with major groups (Pernod-Ricard, Peugeot-Invest, Orange), technology investment activities (several unicorns and one decacorn to her credit) and consultancy services to senior managers in the field of business transformation. Anne Lange is an alumna of the École Nationale d'Administration (ENA) and a graduate of the Institut d'Études Politiques de Paris. She is a French national.

Céline Fornaro, born in 1976, has been Deputy Chief Executive Officer of the French State Investment Agency (Agence des participations de l'État) since October 1, 2023. She began her career in 2000 as Marketing and Product Manager in aircraft sales at Embraer. In 2004, she began working for Merrill Lynch, before being promoted to Managing Director and head of the research team in Aerospace, Defense and Satellites in 2009. In 2016, Céline Fornaro joined UBS as Managing Director of equity research for the industrial sector, covering aerospace, equipment and new energy sources. In June 2022, she joined the Agence des participations de l'État as head of Finance. This professional experience enabled her to acquire thorough knowledge of investment banking and the finance, equipment, aerospace, and transport sectors, with a global, medium- and long-term vision of these sectors. Graduated from France's National School of Civil Aviation (ENAC) in 1997, Céline Fornaro is also graduated from Cranfield University College of Aeronautics (United Kingdom). She is a French national.

Directors elected by employees

		Election date	Term ending
Sébastien Crozier	Member of the Audit Committee	December 3, 2017	December 2, 2029
Vincent Gimeno	Member of the Strategy and Technology Committee	December 3, 2021	December 2, 2029
Pierre Chaussoneaux	Member of the GCSERC	December 3, 2025	December 2, 2029

Pierre Chaussoneaux, born in 1987, has more than 10 years of experience in Telecoms. He worked for Orange for several years as an in-store Sales Consultant and currently still works at the Orange Kleber store in Strasbourg. He began his career on a permanent contract in 2015 at Orange as a Sales Consultant within the distribution channels. His sense of human values, of mutual support and solidarity, and his commitment to the environmental cause led to him becoming involved in a union in 2019. In this context, in 2019 he was the CGT (Confédération générale du travail – General Labor Confederation) elected representative to the Corporate Social and Economic Committee of Orange Grand Nord Est, where he was also appointed union representative, and served as a member on the Health, Safety and Working Conditions Committee of Agence Distribution. He is also a member of the French Group Works Council. His various roles confirmed his decision and the nature of his commitment. He was an elected representative to the Orange Corporate Social and Economic Committee and was a member of the Economic Commission of the Corporate Social and Economic Committee until his election to the Orange Board of Directors on December 3, 2025. He is a French national.

Sébastien Crozier, born in 1968, is Senior Vice-President and Director of Public Sponsorship within the Orange group and overseeing Orange's involvement in international events such as the G7. He began his career in 1990 in telematic activities for the Alten group. He took over its General Management and became its major shareholder. He joined France Telecom Multimédia in 1994 to prepare the launch of online services and as such participated in the launch of Wanadoo. From 1998, he founded several start-ups in the area of online advertising and Internet service provision as a telecommunication operator, with more than 1.3 million customers under the Fnac, M6 and Société Générale brands. Following their acquisition in 2001 by France Telecom (which became Orange), he returned to the Group, becoming Head of Strategy and Innovation Management of part the Enterprise Division in 2003. He managed several subsidiaries in France and abroad on behalf of the Orange group, in Africa and Latin America, as Director of International Development. He is also Chairman of CFE-CGC Orange. He is

also Honorary Chairman of ADEAS (Association pour la défense de l'épargne et de l'actionnariat salariés – Association for the defense of employee saving and shareholding). During the 2001–2002 presidential campaign, he acted as Jean-Pierre Chevènement's permanent advisor on logistics and new technologies. He is Vice President of the recognized public utility foundation Le Refuge. Sébastien Crozier studied engineering at the École Supérieure d'Ingénieurs en Électrotechnique et Électronique (ESIEE) and the Karlsruher Institut für Technologie (KIT) in the field of artificial intelligence. He is a French national.

Vincent Gimeno, born in 1966, is a specialist in innovation and management of technical projects with a strong strategic aspect. He graduated with a specialized master's degree in underwater engineering, with a specialization in robotics and telecommunications, and started his career in the R&D department of France Telecom, at CNET (Centre National d'Etudes des Télécommunications – the national center for telecommunication research), where he managed the millennium transition. He then took over IT and technical responsibility for the Orange R&D sites in Caen, Rennes and Grenoble. In 2006, he reinforced his experience in *Open Innovation* and launched several collaborative projects in the areas of Machine-to-Machine communication and Internet of Things at the Orange Labs, where he headed a Research and Development Unit. His human approach and his commitment led him to continue his career as Director of the User Satisfaction and Ergonomics Project in the Information System Technical Department. In 2015, he was appointed Deputy Central Trade Union *Delegate*, in charge of Employment and Skills Planning (ESP), digital transformation and international matters. In this capacity, he was Deputy Secretary of the Worldwide Works Council (from 2015 to 2019) and a full member of the European Works Council until his election to the Board of Directors of Orange on December 3, 2021. He obtained his Board of Directors certification from IFA/SciencesPo in 2023. He is a French national.

In addition, one member of Orange's Corporate Social and Economic Committee (CSEC) and one representative of the Worldwide Works Council are invited to participate in Board of Directors' meetings.

Changes in the composition of the Board of Directors

Christel Heydemann was reappointed as Director and Frédéric Sanchez as Independent Director by the Shareholders' Meeting of May 22, 2024, each for a four-year term, i.e. until the close of the Shareholders' Meeting called to approve the financial statements for the fiscal year ending December 31, 2027.

The term of office of Thierry Chatelier, Director representing the members of employee shareholders, ended at the close of the Orange Shareholders' Meeting held on May 22, 2024. A new appointment process has been initiated and is the subject of judicial proceedings that are still pending at the date of this document (see Section 5.2.1.8 *Board and committee activities during the fiscal year*).

	Age	Gen- der	Nationality	Number of shares	Number of positions held in other listed companies	Date first appointed	Term ending	Seniority on the Board	Board committee membership
Non-Independent Director									
Christel Heydemann ⁽¹⁾	51		French	71,000	1	07/26/2017	2028 SM	8 years	X
Independent Directors									
Jacques Aschenbroich ⁽²⁾	71		French	8,000	3	05/19/2022	2026 SM	3 years	X
Valérie Beaulieu	58		French	1,000	0	05/19/2022	2026 SM	3 years	Audit Comm.
Alexandre Bompard	53		French	1,000	1	12/07/2016	2027 SM	9 years	STC
Gilles Grapinet	62		French	2,000	1	05/23/2023	2027 SM	2 years	Audit Comm. (Chairman)
Anne-Gabrielle Heilbronner	57		French	1,000	1	05/21/2019	2027 SM	7 years	GCSERC (Chairwoman)
Momar Nguer	69		French and Senegalese	1,000	0	05/23/2023	2027 SM	2 years	GCSERC
Frédéric Sanchez	65		French	1,000	2	05/19/2020	2028 SM	6 years	STC (Chairman)
Directors representing the public sector									
Bpifrance Participations (represented by Thierry Sommelet ⁽³⁾)	56		French	254,219,602	2	05/28/2013	2029 SM	12 years	STC
Céline Fornaro	49		French	0	3	03/24/2023	03/23/2027	3 years	Audit Comm.
Anne Lange	57		French	0	2	05/27/2015	2027 SM	10 years	GCSERC
Director representing employees									
Pierre Chaussonneaux	38		French	294	0	12/03/2025	12/02/2029	< 1 year	GCSERC
Sébastien Crozier	58		French	725	0	12/03/2017	12/02/2029	8 years	Audit Comm.
Vincent Gimeno	59		French	635	0	12/03/2021	12/02/2029	4 years	STC

(1) The Board of Directors' Meeting of January 28, 2022 appointed Christel Heydemann as Chief Executive Officer of Orange, effective from April 4, 2022. On February 16, 2022, on the recommendation of the GCSERC and over and above the criteria set out in Article 10.5 of the Afep-Medef Code, the Board of Directors stated that, in the case in point, she could no longer be considered as an Independent Director.

(2) At its meeting following the close of the Shareholders' Meeting of May 19, 2022, the Board of Directors appointed Jacques Aschenbroich as its Chairman.

(3) Appointed as permanent representative from January 10, 2021. Thierry Sommelet personally holds 400 Orange shares.

5.1.2 Corporate Officers

Chairman of the Board of Directors

Jacques Aschenbroich was appointed Chairman of the Board of Directors at the board meeting held at the close of the Shareholders' Meeting of May 19, 2022 and will serve as such for the duration of his directorship, i.e. until the close of the 2026 Shareholders' Meeting called to approve the financial statements for the fiscal year ending December 31, 2025.

Jacques Aschenbroich's biography can be found in Section 5.1.1 *Board of Directors*.

Chief Executive Officer

The Board of Directors' Meeting of January 28, 2022 appointed Christel Heydemann as Chief Executive Officer from April 4, 2022 and confirmed her appointment to this position on May 19, 2022 for a duration equal to that of the term of office of the Chairman of the Board of Directors; Christel Heydemann is also a Non-Independent Director (see Section 5.2.2.1 *Management structure*).

5.1.3 Executive Committee

In order to encourage gender diversity, Orange pays close attention to the representation of women on its Executive Committee.

As at the date of this document, five of the 13 Executive Committee members were women (including Christel Heydemann), i.e. a 38.5% proportion of women.

Christel Heydemann	Chief Executive Officer
Hugues Foulon	Executive Vice President of the Orange group, Chief Executive Officer of Orange Cyberdefense
Nicolas Guérin	Group Secretary General and Secretary of the Board of Directors
Caroline Guillaumin	Executive Vice President of Communication
Jérôme Hénique	Executive Vice President, Chief Executive Officer of Orange France
Mari-Noëlle Jégo-Laveissière	Executive Vice President, Chief Executive Officer of the Europe region (outside of France) for Orange
Vincent Lecerf	Executive Vice President of Human Resources for the Group
Laurent Martinez	Executive Vice President, Finance, Performance and Development
Aliette Mousnier-Lompré	Executive Vice President of Orange Business
Yasser Shaker	Executive Vice President, Chief Executive Officer of Orange Middle East and Africa
Elizabeth Tchoungui	Executive Vice President of CSR for Orange
Michaël Trabbia	Executive Vice President, Chief Executive Officer of Orange Wholesale
Bruno Zerbib	Executive Vice President of Orange Innovation

Christel Heydemann's biography can be found in Section 5.1.1 *Board of Directors*.

Hugues Foulon has been Executive Vice President of the Orange group and Chief Executive Officer of Orange Cyberdefense since 2018. He began his career in 1994 at Générale des Eaux (Veolia group), where he was appointed Director of a drinking water plant, then Director of Monégasque de Télédistribution and Monégasque des Eaux. In 2000, he made his first foray into the world of telecommunication, joining Vivendi group's Monaco Telecom as Deputy Chief Executive Officer, in charge of functional departments. In 2005, he joined the Group as Director of B2C Commercial Finance for Mobile. He remained there for two years, before moving to Northern Africa and becoming Maroc Telecom's Financial Control Director. In 2007, he returned to Orange, where he took on roles as Financial Control Director for the Marketing and Innovation Division, Director to the Group's *Delegate* Chief Executive Officer, Head of Finance, then Chief Financial Officer of the Africa & Middle East Division. He was then appointed Head of the office of the Chairman and Chief Executive Officer of Orange and Secretary to the Group's Executive Committee. He is a graduate of École Polytechnique and the École Nationale Supérieure de Techniques Avancées (ENSTA). He is also an auditor of the 66th "defense policy" session of the Institut des Hautes Études de Défense Nationale (IHEDN).

Nicolas Guérin has been Group Secretary General since March 1, 2018, and is Secretary to the Board of Directors. He is also Chairman of the Digital Infrastructure Sector Strategic Committee, Vice-Chairman of Fédération Française des Télécoms, after holding the position of Chairman from July 2023 to December 2024, Honorary Chairman of Cercle Montesquieu, and Chairman of the Evaluation and Orientation Committee of the International Chair in Space and Telecommunication Law at the University of Paris XI. Joining the Group's Competition and Regulation Legal Affairs Department in 1998 after his time at SFR, Nicolas Guérin arrived just as the sector was undergoing deregulation. He became head of the department in 2003, before becoming General Counsel and Secretary to the Board of Directors in 2009. In this position, he has been a leading contributor to many ground-breaking legal cases for the Group, including the roaming agreement with Free, M&A transactions to expand the Group's footprint in Africa and Europe, and diversification. He was also involved in establishing the Evaluation and Compensation Committee in the wake of the France Télécom social crisis, and he participated in its work. He has lent essential support to the implementation of regulatory requirements in the B2B market, to the mobile agreement signed between mobile

operators and the French State and its consequences, and to Arcep's fixed market analysis. He is a graduate of the Institut de Droit des Affaires (IDA) and holds a specialized master's degree in Business Law and Taxation from the University of Paris II Panthéon-Assas. Nicolas Guérin is a Knight of the French Legion of Honor.

Caroline Guillaumin has been Executive Vice President of Communication since January 2, 2023. She is also the Associate Chairwoman of the Orange and Cité des Télécoms Foundations, Chairwoman of the Philharmonie de Paris Foundation and Director of the CANAL+ Foundation. Caroline Guillaumin began her career in 1989 in the high-tech sector, working for startups in France and the United States. In 1997, she joined Verity, the then leader in Internet search engines, as Marketing and Communication Director for Europe. Between 1999 and 2009 she worked as Director of Communication and Sustainable Development at Alcatel, SFR and then Alcatel-Lucent. In January 2010, she took up the role of Head of Communications at Société Générale and also became Head of Human Resources for the Group in June 2017. Caroline Guillaumin is a graduate of the Institut d'Études Politiques de Bordeaux and has a Master of Arts in International Relations from Boston University.

Jérôme Hénique has been Executive Vice President, CEO of Orange France since June 1, 2025 and Chairman of the Board of Directors of the Orange Africa & Middle East subsidiary (Orange MEA) since October 30, 2025. He began his career as a consultant. From 2000 to 2009 he served as Marketing Director in Spain, Residential Market Director in France and then Group Chief Marketing Officer at the Orange group. In 2010, he began his career in Africa & Middle East as Deputy Chief Executive Officer of the Sonatel group and then in 2015 became Chief Executive Officer of Orange Jordan. In 2022, Jérôme Hénique was appointed Chief Executive Officer of Orange Africa & Middle East, where he had been Deputy CEO and COO since 2018 and which represents 18 countries and more than 161 million customers. At the head of OMEA, Jérôme Hénique developed a profitable growth model based on connectivity and mobile money services, and a model for the continent-wide pooling of operations. He graduated from the École Nationale Supérieure des Postes et Télécommunications (ENSPTT) in Paris and the Paris Institute of Political Studies.

Mari-Noëlle Jégo-Laveissière has been Executive Vice President of the Europe region (outside of France) for Orange since September 1, 2020. She joined the Group's Executive Committee in 2014 as Senior Executive Director in charge of the Technology and Global Innovation Division, and became Deputy Chief Executive Officer in charge of the same division in May 2018. Since joining

the Orange group in 1996, Mari-Noëlle Jégo-Laveissière has held several management positions: Director of International & Backbone Network Factory, Head of Group Research & Development, Home Marketing Director of Orange France and Regional Manager, Head of Strategy at Wanadoo. Mari-Noëlle Jégo-Laveissière is a graduate of École Normale Supérieure and École des Mines de Paris. She also holds a doctorate in Quantum Chemistry from the University of Paris XI – Waterloo.

Vincent Lecerf has been Executive Vice President of Human Resources for the Group since October 17, 2022. In January 2017, before joining the Group, Vincent Lecerf was appointed Group Chief Human Resources Officer for Imerys, a major French group specializing in industrial minerals. Previously, he was Human Resources Director and a member of the management board for nine years at Tarkett. He has also held various HR management positions for the Valeo, Poclain Hydraulics, Rhodia and Norbert Dentressangle groups. He is a graduate of EDHEC Business School and holds an M. Phil in organizational sociology from Paris IX Dauphine.

Laurent Martinez has been Executive Vice President, Finance, Performance and Development since September 1, 2023. He began his career in 1996 at Astrium, Airbus's defense and space subsidiary, where he held several senior positions in the controlling department. In 2004, he was promoted to Finance Director before being appointed Director of Controlling, Performance and Accounting for the Airbus Group in 2009. He took over as Managing Director of the Airbus Services Business Unit in 2015. In July 2018, Laurent Martinez was appointed Chief Financial Officer of Alstom and member of its Executive Committee. During this period, he played a key role in Alstom's transformation, including the February 2021 acquisition of Bombardier Transportation, which helped create the world leader in rail transport. Laurent Martinez trained as an engineer in Electronics & Telecommunications and holds a Master's degree in finance and accounting.

Aliette Mousnier-Lompré has been Executive Vice President, CEO of Orange Business since May 24, 2022. Since joining Orange in 2006, she has held various management positions in the Group's B2B, Wholesale and Innovation divisions: Head of Mobile Data and Head of Pricing in International Carriers, Business Development Director for the Enterprise Global Voice and Conferencing business, Chief of Staff to the Executive Vice President for Innovation & Research, and Vice President Global Enterprise Networks. From July 2019, she was Executive Vice President of Customer Service and Operations at Orange Business Services, responsible for leading a multicultural team of 8,600 people designing, building, and operating a wide variety of business solutions through a 24/7 model covering all geographic regions. She was appointed interim Chief Executive Officer of Orange Business Services in January 2022 before being confirmed in her current position in May 2022. As a former semi-professional soccer player with the Paris Saint Germain soccer club, Aliette Mousnier-Lompré has turned her experience in team sports into a major strength when it comes to leading her teams today. She holds a Master's degree in international business from the Paris Institute of Political Studies and also studied at the University of California, Berkeley.

Yasser Shaker has been Executive Vice President, Chief Executive Officer of Orange Middle East and Africa since July 1, 2025. He became CEO of Orange Egypt (OEG) in 2018 during a particularly challenging period and successfully led a major turnaround, reviving growth, restoring profitability, and strengthening OEG's market position, now serving more than 33 million customers. With 28 years of telecom experience, Yasser has expertise in multinational corporate and country-level management. He also served as CTIO at Orange Africa & Middle East, where he played a key role in implementing the Group's digital strategy. Passionate about

young people's development, he currently serves as Chairman and board member of several universities and organizations. A telecom engineer with an MBA, he speaks four languages.

Elizabeth Tchoungui is Executive Vice President of CSR for Orange. She oversees the Group's social and environmental responsibility policy in line with the objectives of the *Lead the Future* strategic plan. Born in the United States to French and Cameroonian parents, she grew up in Cameroon, Belgium and Italy. Trained as a journalist, she has held senior positions at major national and international media (France Télévisions, France 24, TV5 Monde). She is the author of several books, including: "Le jour où tu es né une deuxième fois" (Flammarion), which tells the story of her son with autism; "Je vous souhaite la pluie" (Plon), which has been translated into Italian and is taught in high schools and universities in Cameroon; and "Bamako Climax" (Plon), a novel set against the backdrop of terrorism in the Sahel belt. She has been Chairwoman of *Capital Filles* since 2021. This association was established by Orange in 2012 to support girls from working-class neighborhoods and rural areas in their career choices and their encounters with the business world. She is also Co-Chair of the international financial institutions division of Medef International and Director of the Orange and Cité des Télécoms foundations and of Théâtre du Châtelet. Elizabeth Tchoungui is a graduate of the École Supérieure de Journalisme in Lille, a Knight of the French Order of Merit and a Knight of the French Order of Arts and Letters.

Michaël Trabbia has been Executive Vice President and Chief Executive Officer of Orange Wholesale since April 3, 2023. He began his career at Arcep in 2001, taking charge notably of the allocation and control of mobile licenses. In 2004, he was appointed technical advisor to the office of the Minister for European Affairs, before joining the office of the Minister for Regional Planning in 2005 as technical advisor for ICT and Europe. In 2007, he joined TDF (a network and infrastructure operator in France), where he served as Director of Strategy and Development. In July 2009, he was appointed Deputy Chief of Staff to the Minister for Industry and Head of the Industrial Sectors Division. He joined the Orange group in January 2011. He first held the position of Group Director of Public Affairs, before being appointed Director reporting to the Chairman and Chief Executive Officer of Orange, Secretary to the Group's Executive Committee, in July 2014. In September 2016, he was appointed Chief Executive Officer of Orange Belgium and helped the company to achieve a growth dynamic thanks to customer-centric Bold Challenger positioning. On September 1, 2020, he joined the Group's Executive Committee, serving until April 2, 2023 as Group's Chief Technology & Innovation Officer and overseeing the Orange Innovation division. He is a graduate of the École Polytechnique and Télécom ParisTech, and holds a post-graduate diploma in Industrial Economics.

Bruno Zerbib has been Executive Vice President of the Orange Innovation entity since June 1, 2023. He began his career in 1998 in Silicon Valley, where he held several positions at Hewlett Packard and then at Cisco. He moved to Yahoo in 2012, where he led the company's transformation into a Cloud-native platform capable of handling over one billion monthly users. In 2017, Bruno Zerbib joined Altice as Director of Technology and IT. He worked within the Altice Global Engineering Innovation division on key topics such as the augmented TV experience, technology partnerships, and network transformation for all Altice subsidiaries. In 2018, he joined Schneider Electric as Chief Technology and Digital Officer to provide more efficient and sustainable technological solutions to Schneider Electric's customers. In particular, he developed the use of the Cloud, artificial intelligence, and industrial IoT. Bruno Zerbib is a graduate of TélécomSud Paris and the University of Paris Cité, where he majored in computer science.

5.1.4 Information on Directors, Officers and Senior Management

5.1.4.1 Positions held by Directors and Officers

As of the date of this document and to the best of the Company's knowledge, all members of the Board of Directors meet the criteria set out in Article 20 of the Afep-Medef Code regarding the number of positions held.

Jacques Aschenbroich

Positions currently held

- Director and Chairman of the Orange Board of Directors⁽²⁾
- Director of BNP Paribas, Chairman of its Governance, Appointments and CSR Committee, and member of its Accounts Committee⁽²⁾
- Lead Director of TotalEnergies, Chairman of its Governance and Ethics Committee, and member of its Compensation Committee and Strategy Committee⁽²⁾
- Chairman of the Orange Foundation⁽¹⁾
- Honorary Chairman of Valeo⁽²⁾
- Chairman of the French-American Foundation

Other positions and offices held over the past five years

- Director, Chairman and Chief Executive Officer of Valeo⁽²⁾
- Director of Veolia Environnement⁽²⁾, Chairman of its Research, Innovation and Sustainable Development Committee, and member of its Accounts and Audit Committee
- Chairman of the Board of Directors of the École Nationale Supérieure Mines ParisTech
- Co-Chairman of the Franco-Japanese Business Club
- Vice-Chairman of the French Institute of Sustainable Finance (Institut de la Finance Durable)

Christel Heydemann

Positions currently held

- Director and Chief Executive Officer of Orange⁽²⁾
- Member of the Supervisory Board of Canal+ SA⁽²⁾

International

- Permanent representative of the Orange subsidiary (Atlas Countries Support) on the Medi Telecom Board of Directors⁽¹⁾ (Morocco)

Other positions and offices held over the past five years

- Member of the Orange Audit Committee
- Chairwoman and Director of Schneider Electric France SAS
- Director of Schneider Electric Industries SAS
- CEO of Europe and France Operations of Schneider Electric and member of its Executive Committee⁽²⁾
- Director of France Industries
- Chairwoman of GIMELEC
- Director of Rexecode

Valérie Beaulieu

Positions currently held

- Director of Orange and member of its Audit Committee⁽²⁾

International

- French Foreign Trade Advisor (member of the Board in charge of innovation in Switzerland, Seattle and Singapore)
- Member of the French Tech Advisory Board (Switzerland)
- Director of Etraveli Group (Sweden)

Other positions and offices held over the past five years

- Director of ISS A/C and member of its Audit and Risk Committee⁽²⁾
- Chief Sales and Marketing Officer at the Adecco Group⁽²⁾ (Switzerland)
- President of Pontoon (subsidiary of the Adecco Group) (United States)

(1) Company in which Orange holds an interest.

(2) Office in a listed company.

Alexandre Bompard

Positions currently held

- Director of Orange and member of its Strategy and Technology Committee⁽²⁾
- Chairman and Chief Executive Officer of Carrefour⁽²⁾
- Chairman of Fondation Carrefour
- Director of the Fondation Nationale des Sciences Politiques
- Chairman of the French Trade and Retail Federation (Fédération Française du Commerce et de la Distribution)
- Director of the French Association of Private Enterprises (Association Française des Entreprises Privées)

Other positions and offices held over the past five years

None

Pierre Chaussoneaux

Positions currently held

- Director of Orange and member of its GCERC⁽²⁾

Other positions and offices held over the past five years

None

Sébastien Crozier

Positions currently held

- Director of Orange and member of its Audit Committee⁽²⁾
- Member of the Rodeo Supervisory Board
- Honorary Chairman and member of the Board of Directors of ADEAS – a non-profit association as provided for in France's Loi de 1901
- Chairman of CFE-CGC Orange union confederation – a trade union as provided for in France's Loi Waldeck-Rousseau
- Chairman of Ciné-club de l'Hôtel du Nord et du Canal Sain-Martin – a non-profit association as provided for in France's Loi de 1901
- Vice President of Le Refuge (recognized public utility foundation)
- Member of the Board of Directors of the Institut Aspen France
- Member of the Board of Directors of la Communauté des Agrumes – a trade union as provided for in France's Loi Waldeck-Rousseau

Other positions and offices held over the past five years

None

Céline Fornaro

Positions currently held

- Director representing the French State on the Board of Directors and member of the Orange Audit Committee⁽²⁾
- Director representing the French State, member of the Audit Committee, Strategy, Investment and Technology Committee, and Appointments, Compensation and Governance Committee of ENGIE⁽²⁾
- Director representing the French State, member of the Audit Committee, Appointments and Governance Committee and Remuneration Committee of Air France–KLM⁽²⁾
- Director representing the French State, member of the Audit and Risk Committee and Appointments and Compensation Committee of SAFRAN⁽²⁾

International

- Member of the Chatham House, The Royal Institute of International Affairs (UK)
- Member of the Royal Aeronautical Society (UK)
- Member of the Women on Boards (UK)
- Member of the Aviation Club (UK)

Other positions and offices held over the past five years

- Director of RATP representing the French State
- Director of EDF representing the French State⁽²⁾

Vincent Gimeno

Positions currently held

- Director of Orange and member of its Strategy and Technology Committee⁽²⁾

Other positions and offices held over the past five years

None

(2) Office in a listed company.

Gilles Grapinet

Positions currently held

- Director of Orange and Chairman of its Audit Committee⁽²⁾
- Director and Chairman of the Audit Committee of Younited SA
- Member of the Board of Directors of Énergie Jeunes (a non-profit association)
- Member of the AlphaOmega Foundation Board of Directors

International

- Independent Director and Chairman of the Audit Committee of Younited Financials (Luxembourg)⁽²⁾

Other positions and offices held over the past five years

- Chairman of the Board of Directors, Chief Executive Officer, member of the Strategy and Investment Committee and Social and Environmental Responsibility Committee of Worldline⁽²⁾
- Chairman of the Supervisory Board of EquensWorldline SE (Netherlands)
- Director of Saint Louis Ré SA (Luxembourg)
- Chairman of the Worldline IGSA Board of Directors
- Chairman of the Supervisory Board of Younited SA
- Chairman of the Board of Directors of Worldline Bidco 1
- Supervisor of Worldline Co Ltd (China)
- Chairman of the Shareholders' Committee of Worldline Payone Holding GmbH (Germany)
- Chairman of Worldline Corporate Foundation
- Vice-Chairman of EDPIA (European Digital Payment Industry Alliance)
- Director representing Worldline on the EPI Company Board of Directors

Anne-Gabrielle Heilbronner

Positions currently held

- Director of Orange and Chairwoman of its GCSERC⁽²⁾
- Secretary General of Publicis group⁽²⁾
- Chairwoman of Publicis Groupe Services
- Director and Chief Executive Officer and head of the key shareholding function of Publicis Ré
- Director of Sanef and Chairwoman of its Audit Committee
- Director of Somupi
- Representative of Multi Market Services France Holdings on the Board of Directors of Régie Publicitaire des Transports Parisiens Metrobus Publicité (METROBUS)
- Member of the Executive Committee of Multi Market Services France Holdings
- Director of the Musée d'Art et d'Histoire du Judaïsme
- President of The Aspen Institute

International

- Director and Chairwoman of the Publicis Foundation (United States)
- Director of Sapient Corporation (United States)
- Director of Publicis Groupe Holdings B.V. (Netherlands)
- Director of Publicis Limited (UK)
- Director and Chairwoman of Publicis Live SA (Switzerland)

Other positions and offices held over the past five years

- Director of JG Capital Management
- Representative of Multi Market Services France Holdings on the Board of Directors of WEFCOS
- Director of US International Holding Company, Inc. (United States)
- Director of Publicis Groupe Investments B.V. (Netherlands)
- Director of Publicis Holdings B.V. (Netherlands)
- Member of the Management Board of Publicis Groupe⁽²⁾
- Chairwoman of WEFCOS (Women's Forum for the Economy and Society)
- Director of Chargeurs⁽²⁾
- Director of BBH Holdings Limited (UK)

Anne Lange

Positions currently held

- Director of Orange and member of its GCSERC⁽²⁾
- Director of Pernod Ricard, member of its Audit Committee and Nominations and Governance Committee⁽²⁾
- Director of Peugeot Invest, member of its Investment Committee and Governance, Appointments and Compensation Committee⁽²⁾

International

- Managing partner of ADARA (Belgium)

Other positions and offices held over the past five years

- Director, member of the Audit Committee, Nomination Committee and CSR Committee of Inditex (Spain)⁽²⁾

⁽²⁾ Office in a listed company.

Momar Nguer

Positions currently held

- Director of Orange and member of its GCSERC⁽²⁾
- Director of Emerging Capital Partners (ECP)
- Member of the Meridiam Advisory Board
- Chairman of Mnguer Advisory SAS
- Chairman of Holding Nguer
- Director of ERANOVE

International

- Director of Sea Invest (Belgium)
- Director of Terminal Pétrolier Dakar (Senegal)
- Director of Arise P&L Limited (UK)
- Member of the A.P. Moller Capital Advisory Board (Denmark)
- Independent Director of Managem (Morocco)

Other positions and offices held over the past five years

- Advisor to the Chairman and CEO of TotalEnergies⁽²⁾
- Director and Chairman of the Audit Committee of Lafarge Holcim Maroc (Morocco)
- Director of NMA (Senegal)

Frédéric Sanchez

Positions currently held

- Director of Orange and Chairman of its Strategy and Technology Committee⁽²⁾
- Chairman of Fives⁽³⁾
- Director and member of the Audit and Risk Committee of Bureau Veritas⁽²⁾
- Member of the Théa Holding SAS Supervisory Board
- Chairman of MEDEF International
- Honorary Chairman of the Alliance Industrie du Futur (Industry of the Future Alliance) of the Conseil national de l'industrie (National Industry Council – CNI)
- Chairman of the French chambers of commerce and industry abroad (CCI France International – CCI FI)

International

- Member of the STMicroelectronics Supervisory Board⁽²⁾ (Netherlands)

Other positions and offices held over the past five years

- Director of Compagnie des Gaz de Pétrole Primagaz SAS
- Honorary Chairman of the Solutions for the Industry of the future sector (SIF)

Thierry Sommelet

Positions currently held

- Permanent representative of Bpifrance Participations on the Orange Board of Directors and member of the Orange Strategy and Technology Committee⁽²⁾
- Director of Worldline, member of its Compensation Committee, Appointments Committee and Strategy and Investment Committee⁽²⁾
- Permanent representative of Bpifrance Participations on the Vantiva SA Board of Directors, member of the Vantiva SA Governance and Social Responsibility Committee and of its Audit Committee⁽²⁾
- Representative of Bpifrance Investissement on the IDEMIA Group SAS Supervisory Board
- Permanent representative of Bpifrance Investissement on the IDEMIA France SAS Board of Directors
- Director of the Worldline Corporate Foundation

Other positions and offices held over the past five years

- Permanent representative of Bpifrance Participations on the Technicolor Creative Studios Board of Directors and member of its Remuneration Committee⁽²⁾
- Director of Soitec⁽²⁾
- Director of Talend⁽²⁾

(2) Office in a listed company.

(3) Several positions held in unlisted French and foreign subsidiaries of the FIVES group.

The business address of all Directors and Officers, in relation to their positions, is that of Orange SA's headquarters (see Section 7.1 *Company identification*).

Positions and offices held in 2025 by Directors whose terms of office have ended since January 1, 2025

Magali Vallée

Positions currently held

- Director of Orange and member of its GCSERC⁽²⁾

Other positions and offices held over the past five years

None

(2) Office in a listed company.

5.1.4.2 Information on Company shares held by Directors and Officers

Number of shares held by Directors and Officers

According to the terms of Article 13 of the Bylaws, each Director appointed by the Shareholders' Meeting must hold a minimum of 1,000 Company shares, with the exception of Directors elected by employees, the Director representing employee shareholders and the Directors representing the public sector, who are exempt in accordance with the law.

In addition, the Board of Directors has decided that each of the Corporate Officers must also hold at least 1,000 registered shares.

The following information is provided as at the date of this document and to the Company's knowledge:

		Number of shares
Chairman of the Board of Directors, Independent Director	Jacques Aschenbroich	8,000
Chief Executive Officer, Non-Independent Director	Christel Heydemann	71,000
Independent Directors	Valérie Beaulieu	1,000
	Alexandre Bompard	1,000
	Gilles Grapinet	2,000
	Anne-Gabrielle Heilbronner	1,000
	Momar Nguer	1,000
	Frédéric Sanchez	1,000
Directors representing the public sector	Bpifrance Participations (Thierry Sommelet, permanent representative of Bpifrance Participations, personally holds 400 Orange shares)	254,219,602
	Céline Fornaro	0
	Anne Lange	0
Directors elected by employees	Pierre Chaussoneaux	294
	Sébastien Crozier	725
	Vincent Gimeno	635

Transactions by Directors and Officers on Company securities

The following table details the transactions, reported to the AMF (*Autorité des marchés financiers* – French Financial Markets Authority), performed on Orange securities during the 2025 fiscal year and between January 1, 2026 and the date of this document by the persons referred to in Article L. 621-18-2 of the French Monetary and Financial Code.

Name	Financial instrument	Type of transaction	Transaction date	Number of securities	Average unit price (in euros)
None					

To the Company's knowledge, no other transactions having to be reported to the AMF have taken place. Note that, as the Shareholders' Meeting of May 21, 2025 approved, pursuant to its eighth resolution, the components of compensation paid during the fiscal year ended December 31, 2024 or allocated for the same fiscal year to the Chief Executive Officer, Christel Heydemann has benefited from the final vesting of 70,000 Orange shares under the 2022–2024 performance share plan (LTIP) (see Section 5.4.1.2 *Amount of compensation paid or allocated to Corporate Officers for 2025*).

Restrictions regarding the disposal of shares by Directors and Officers

Directors and Officers holding shares under the Orange group's savings plan through company mutual funds that are invested in shares of the Company are subject to the lock-up rules under the legal provisions applicable to investments in this type of employee savings plan.

Moreover, within the framework of the EU "market abuse" regulation, Article 16 of the Board of Directors' Internal Guidelines prevents Directors from engaging in any transactions on the securities of the listed companies of the Group during the periods preceding the publication of results (black-out periods), and more generally, if they have knowledge of inside information, and from directly or indirectly engaging in short sales of such securities. Each new Director is informed of these rules.

When the Shareholders' Meeting authorizes the award of performance shares (LTIP), Executive Corporate Officers must keep at least 50% of the shares they receive as registered shares until the end of their terms of office. In addition, it is expressly provided that Corporate Officers must not enter into hedging instruments on these shares until the end of their terms of office.

To the Company's knowledge, none of the Company's Directors or Officers has agreed to any other restriction on the disposal, within a certain period of time, of the Company shares that they own.