financial communications

iliad's Sustainability and CSRD Report

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2024

iliad GROUP

4. Non-financial performance

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4.1 Introduction to iliad's Sustainability and CSRD Reporting

Context for iliad's first CSRD reporting exercise

For the first time, the iliad Group is reporting under the Corporate Sustainability Reporting Directive (CSRD) in compliance with directive (EU) 2022/2464 of December 14, 2022, a regulatory framework designed to enhance transparency and support the transition towards a low-carbon economy. This report outlines both our impact on the environment and society, as well as how sustainability-related factors influence our business operations and future resilience. It also reflects the governance mechanisms in place to oversee these matters and ensure accountability at the highest level.

To align with these requirements, we have conducted a Double Materiality Assessment (DMA) to identify material sustainability topics in terms of Impacts, Risks, and Opportunities (IROs). This assessment strengthens our approach by ensuring that we address both financial and impact materiality while also improving the quality of our Environmental, Social and Governance (ESG) data to support informed decision-making.

We have prepared this report in accordance with the European Sustainability Reporting Standards (ESRS), applying those in force at the time of drafting and based on information available to date.

As with any first-time implementation, the preparation of this report has presented several challenges – particularly related to data availability, methodological adaptation, and rapidly evolving regulatory expectations. Certain limitations are therefore outlined in the following sections. We remain committed to strengthening the scope, quality, and reliability of our sustainability disclosures over time, in line with evolving expectations and best practices.

For ease of reading, a glossary and list of acronyms are provided in the annex.

4.2 ESRS 2 - General disclosures

ESRS 2 defines mandatory, cross-cutting sustainability disclosures under CSRD. In the following chapter, we outline how iliad aligns with these requirements through:

- **Basis for Preparation**: Reporting principles and specific circumstances;
- **Governance**: Oversight, due diligence, and internal controls;
- **Strategy**: Integration of sustainability into our business model and risk management;
- **Impact, Risk & Opportunity Management**: Materiality assessment and key policies.

Basis for preparation

BP-1 - General basis for preparation of the sustainability statement

The iliad Group is subject to the application of Directive (EU) 2022/2464 of 14 December 2022, known as the Corporate Sustainability Reporting Directive (CSRD), transposed into French law by Ordinance 2023-1142 of 6 December 2023. In accordance with this regulatory framework, iliad is publishing its first CSRD report in 2025, covering the fiscal year 2024.

This report has been prepared in compliance with the European Sustainability Reporting Standards (ESRS), as applicable at the time of its preparation, ensuring that iliad's sustainability statement aligns with the regulatory requirements. The Company has structured its reporting in line with ESRS guidelines, maintaining the overall organization set forth in the standards.

Legal entities consolidated under Equity Consolidation method are excluded from the CSRD scope but integrated into the value chain (for further scope description please refer to dedicated URD section). Furthermore, the current report covers iliad's own operations as well as, where applicable, key elements of its upstream and downstream value chain.

iliad's value chain was included in the identification and assessment of the Company's impacts, risks and opportunities (IRO) as required by the ESRS. Depending on the topic, some policies and actions aimed at addressing IROs include business relationships such as key suppliers. The carbon footprint of iliad's value chain is also included in the disclosure of its Scope 3 GHG emissions, as required by the GHG Protocol.

BP-2 - Disclosures in relation to specific circumstances

This section lists key characteristics and hypothesis taken for the preparation of this report. The iliad Group primarily relied on the standard regulatory requirements to prepare this report. However, some exceptions were applied, as detailed below.

Time horizons

The iliad Group principally aligns its medium- and long-term time horizons with the ESRS standards. Accordingly, the sustainability statement follows the financial statement for short-term data (current year), defining the mid-term as one to five years, and considers the long-term as beyond five years. However, some misalignments has been identified regarding:

- carbon targets, which follow SBTi time horizon standards. SBTi (Science Based Targets Initiative) requires near-term targets of 5-10 years and long-term targets set for 2050 or earlier;
- climate physical and transition risk analysis, using specific timeframes for short-, medium-, and long-term assessments (please refer to section *Physical risks analysis* and *Transition risks and opportunities analysis* in E1 for more information).

Value chain estimation

Due to limited primary data, especially in the upstream and downstream value chain, and the absence of specific emissions factors for some products, we relied on estimates to assess Scope 3 greenhouse gas (GHG) emissions.

Since it is not feasible to determine precise emissions factors for each individual product, we use an average value for calculations in the upstream value chain. Given that only a few suppliers have provided primary data, we have relied on secondary statistical data, in line with industry practices.

For the Freebox, we primarily rely on our internal Life Cycle Analysis (LCA). Due to the complexity of data collection across value chain stakeholders, LCA are continuously refined over time, leading to ongoing improvements in accuracy and data quality.

Sources of estimation and key limitations

This report includes certain estimates and assumptions based on the best available data at the time of reporting. To ensure transparency and consistency, defined methodological approaches, the use of proxies, and clearly stated limitations have been applied. Moreover, several disclosures are subject to inherent uncertainties due to the evolving nature of scientific understanding, economic modeling, and regulatory interpretation. These limitations affect the following areas in particular:

- **carbon footprint estimate (E1)**: standard emission factor has been used. If not available (e.g. not given by providers), proxy were used. Indirect electricity consumption is assessed based on iliad's own equipment consumption figures;
- **climate transition plan (E1)**: the transition plan is not formalized yet, although key decarbonization levers have been identified and disclosed;
- **EU Taxonomy Eligibility (E1)**: iliad's eligibility rate remains relatively low due to few Taxonomy activities corresponding to iliad's activity sector;
- **climate risk adaptation & resilience analysis (E1)**: an initial analysis has been conducted and is disclosed in this report, but a more thorough assessment is underway;
- **water and marine ressources (E3)**: disclosures related to water usage are limited to iliad's data centers (OPCORE & Scaleway) and do not address marine resources due to non-materiality;
- **resource use and circular economy (E5)**: the current disclosure combines recycled and reused waste, as the breakdown is not yet available;
- **inflow and waste management assessment (E5)**: proxies have been used, particularly for estimating material weight, including optical fiber, antennas, and servers;
- **payment delays (G1)**: assumptions and uncertainties in the calculations are detailed in section G1-6;
- **newly integrated subsidiaries**: our key responsible conduct policies (including the Partner Charter, Anti-Corruption Code of Conduct, Code of Ethics, Gifts & Hospitality Policy, and Personal Data Protection Charter), referenced notably in G1, are defined at Group level. However, they do not yet apply to newly integrated subsidiaries such as ITrust and Madiacom, as these entities have only recently been included in the Group's consolidated reporting scope;
- **joint operation entities**: in the absence of a definitive stance at this stage on the integration of data from Joint Operation entities, we have chosen to proceed with the following treatment: for data that can be divided - particularly environmental data - we applied a pro rata split for instance in the case of Zefiro. For indivisible data, such as Full Time Equivalent (FTEs), we retained full values;
- **consolidation of moroccan operations**: data relating to operations in Morocco are included under France in this report unless stated otherwise.

Governance

GOV-1 - The role of the administrative, management and supervisory bodies

Composition and diversity of Administrative, Management, and Supervisory Bodies

The composition of the Group's administrative and management bodies is further described in URD section 3.1.

The governance structure of the iliad Group is designed to ensure effective oversight, strategic direction, and ethical business conduct. This structure is characterized by a clear separation of roles and responsibilities between the management and the supervisory body, enhancing transparency and accountability within the organization.

The Group's governance is based on a two-tier structure, where the Board of Directors, chaired by Xavier Niel, oversees strategic decision-making and governance, ensuring that the Group's activities align with its strategic goals and governance principles while the Chief Executive Officer, Thomas Reynaud, handles operational and executive responsibilities.

The Group's governance model promotes a balanced structure where discussion and information exchange are prioritized, ensuring rigorous and effective decision-making.

The Board of Directors is composed of eleven members, with four members (44%) being independent directors and four (44%) being female members (excluding employee representative directors). It includes one executive director and ten non-executive directors. Owing to their past or current experience, the members of the Board of Directors bring a wide range of expertise in Telecom & Digital Innovation, Entrepreneurship & Global Expansion, Financial & Strategic Oversight and Sustainability. These skills collectively enable iliad to navigate the evolving telecom industry, drive innovation, and maintain a competitive edge.

The diversity policy governing the Board of Directors is set out in detail in section 3.2.1.3. It is based on four pillars: parity, qualifications and expertise, independence and employee representation.

The Board of Directors is supported by three committees: the CSR Committee, the Audit Committee, and the Compensation Committee, each detailed further in the Roles and Responsibilities in Oversight of Impacts, Risks, and Opportunities section. All three committees have an independence rate of 67%.

As legally required, the Board of Directors also comprises two employees of the Group, one of whom was a member of the Compensation Committee until mid-november 2024, and the other is a member of the CSR Committee.

The Board of Directors benefits from a diverse range of expertise, with members bringing extensive experience from various sectors and industries. Xavier Niel, founder of iliad, plays a central role in shaping the Company's strategic direction. Thomas Reynaud, Maxime Lombardini and Cyril Poidatz, with their deep knowledge of the telecom sector and leadership roles within iliad, offer strategic insights into the Company's operations. Virginie Calmels and Esther Gaide add valuable perspective on financial management, auditing and corporate governance while Céline Lazorthes brings extensive expertise in entrepreneurship, innovation and digital technologies. Jacques Veyrat, with his background in energy and infrastructure, strengthens the Board with his strategic outlook on long-term investments and market dynamics. Finally, Bertile Burel contributes to the Board with her expertise in international business development and entrepreneurship focus. Together, they combine a wealth of expertise across key areas that support iliad's growth and innovation.

The skills and qualifications of the Board members are further described above and in URD sections 3.1.2 and 3.2.1.4, which presents a skills matrix highlighting eight key competencies deemed essential for fulfilling the Board's responsibilities.

The Group also comprises an Executive Committee, responsible for steering the Group's activities and ensuring the implementation of its key policies, which consists of five members, including two women, representing a 40% female representation.

Expertise and skills in sustainability matters

The members of iliad's Board of Directors bring diverse expertise in Corporate Social Responsibility (CSR), enriched by their varied professional backgrounds, their commitment to sustainable initiatives, and their contributions to strategic projects addressing environmental, social, and governance issues. Below is an overview of CSR expertise of the directors identified as 'competent' in this area in the matrix in section 3.2.1.4.

Xavier Niel

Xavier Niel's dedication to social responsibility extends beyond business. He has invested in projects with a positive social impact, such as supporting education and innovation with initiatives like Station F, a start-up incubator in Paris fostering entrepreneurship and job creation, École 42, an innovative and free coding school designed to provide accessible, high-quality tech education to individuals from all backgrounds supporting digital inclusion, HECTAR, an agricultural school which focuses on eco-friendly farming practices in order to address critical challenges such as climate change, biodiversity loss, and food security.

Thomas Reynaud

Over the years, Thomas Reynaud has demonstrated a strong commitment to Sustainability, and social innovation, driving impactful projects. Under his direction, the Group's carbon reduction pathway has been validated by the Science Based Targets initiative (SBTi), iliad transformed its main syndicated loans into Sustainability-Linked Loans (SLLs), incorporating CSR performance indicators related to carbon footprint reduction and gender diversity, and the Group has signed three new Power Purchase Agreements (PPAs) reflecting the continued efforts to achieve iliad's goal of reducing its carbon emissions and decarbonizing its energy supply.

Jacques Veyrat

Jacques Veyrat demonstrates expertise in CSR through his extensive professional experience. He is the founder of Impala, which, from the outset, has focused on renewable energies (solar, wind, energy storage), in particular through the creation of *Neoen*, but also through Direct Energie, and through Eiffel Investment Group. Impala is also committed to diversifying its human and financial investments in other fields, such as innovative cosmetics, eco-responsible fashion, product traceability and organic food. Through these various investments, Jacques Veyrat shows his deep commitment to combating climate change and in-depth knowledge of various CSR issues.

Virginie Calmels

Virginie Calmels has a strong focus on youth employment, education, gender equality, and social impact. As the Founder and President of FUTURA, she addresses youth unemployment by offering hands-on, professional education.

Virginie Calmels is also deeply involved in women's rights as President of Honor of the Oui Care Foundation, which combats violence against women and promotes gender equity. Her work in corporate governance as a board member of companies like Ipsos, Assystem or PullUp Entertainment reflects her commitment to integrating sustainability and social responsibility into business strategies.

Virginie Calmels also held executive positions at companies such as Canal+, Numericable, and Endemol, where she gained substantial experience in addressing strategic challenges related to governance and CSR.

Céline Lazorthes

By founding Leetchi and Mangopay, Céline Lazorthes has championed inclusive and sustainable economic models, facilitating crowdfunding initiatives. Additionally, her commitment to gender equality is reflected in her co-founding of the Sista collective, which aims to promote investment in women-led businesses, underscoring her dedication to fostering diversity in the entrepreneurial landscape.

In 2021, Céline Lazorthes launched Résilience, a platform dedicated to supporting cancer patients, with the goal of enhancing their care and overall experience.

Roles and responsibilities in oversight of impacts, risks, and opportunities

The Board of Directors, led by President Xavier Niel, with the support of the three committees, plays an important role in incorporating sustainability into both decision-making and operations.

The Board is responsible for setting the overall sustainability strategy and ensuring it aligns with the Group's long-term goals. It ensures that sustainability is embedded in the Company's vision and corporate culture.

The Audit Committee monitors the integrity of financial statements, internal controls, and risk management effectiveness related to sustainability. It also oversees internal audits where relevant and ensures the accuracy of sustainability-related disclosures in financial statements and reports.

The CSR Committee oversees, coordinates, and promotes social and environmental responsibility initiatives within the Group. It supports management in addressing these issues and ensures that social and environmental factors are integrated into strategic decision-making.

The Audit Committee and the CSR Committee oversee the identification and management of sustainability-related risks, ensuring that environmental, social, and governance risks are effectively mitigated. They also review progress on sustainability goals and initiatives, ensuring that targets are being met and identify areas for improvement.

The Compensation Committee assists the Board in making decisions about the compensation of the Group's executive officers and key managers. It provides advice and prepares proposals and recommendations on compensation, considering corporate governance guidelines and market practices. Additionally, the Compensation Committee ensures that executive compensation and incentives are aligned with sustainability goals, rewarding performance that supports long-term sustainability objectives.

The General Management and Executive Committee steer the Group's sustainable development by defining strategic directions and key policies in this area. They supervise the implementation of the sustainability program and monitor progress on the Group's roadmap. As the key drivers of the decision-making process, they ensure that sustainability initiatives are fully integrated into business operations, aligning with the Group's CSR commitments.

A dedicated CSR team oversees and supports the implementation of the Group's sustainability roadmap. It develops appropriate tools and methodologies while assisting both business and local teams. The team plays a crucial role in sharing best practices and evaluating sustainability performance, ensuring regular monitoring of outcomes and progress.

CSR Ambassadors are selected among the Group's employees across its various operational units in France and promote the Group's ESG and sustainability initiatives. They also act as key points of contact for providing feedback on these issues to decision-making bodies.

Key supervisory instances of IROs

- **Board of Directors**
- **CSR Committee**
- **Audit Committee**
- **General Management and Executive Committee**
- **Compensation Committee**
- **CSR team**
- **CSR Ambassadors**

GOV-2 - Information provided to, and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies

Informing administrative, management, and supervisory bodies

iliad ensures that its administrative, management, and supervisory bodies are well-informed about sustainability matters through several channels.

As sustainability is a fundamental aspect of iliad's strategy, the Board members are actively engaged in discussions on these matters.

In 2024, the Board specifically discussed:

- the launch of the Freebox ultra which was designed to be as energy efficient as possible;
- the signature of three new renewable energy projects and the validation by the SBTi of iliad's carbon reduction pathway are key milestones in iliad's ambition to reduce its carbon emissions and decarbonize its energy supply;
- the issuance of a €500 million green bond issue to invest in technologies promoting sustainable development. The proceeds from this green bond are issued in line with the Group's Green Financing Framework launched in 2024, which received a positive second-party opinion from Sustainalytics. The framework includes criteria related to e.g. energy efficiency in networks and data centers, as well as renewable energy. For more information, please refer to E1-1.

The CSR topics are also addressed and challenged at the CSR committee level throughout the year with the CEO and the Group Chief Sustainability Officer playing key roles in these discussions. In 2024, the committee focused on the presentation of the Group's environmental, social and societal challenges and progress and in the initial results of the analyses conducted to produce the CSRD report.

Consideration of material impacts, risks, and opportunities in strategic oversight

The governance framework supports the integration of ESG factors into strategic planning and decision-making. In Q4 2024, the internal CSR committee met, involving actively iliad's top management in the Double Materiality Assessment (DMA) process carried out as part of the preparation of the present report. The DMA was an opportunity to systematically review and assess all material impact, risks and opportunities relevant to the Group and to update its sustainability roadmap.

GOV-3 - Integration of sustainability-related performance in incentive schemes

Key characteristics of incentive schemes

Today, iliad's sustainability incentive schemes are linked to some of the share allocation plan who includes both sustainability and financial targets. Specifically, in 2023, the allocation of free shares for selected employees of the group is partially linked to the improvement of a CSR index from one year to another. Extra-financial performance carries equal weight (50%) with financial performance (50%) in determining the final acquisition of free shares. In summary, these shares can only be fully allocated if the Company has performed well both financially and extra-financially. This approach ensures a convergence of interests towards a sustainable and balanced value creation model.

Performance assessment against sustainability-related targets

The last and main free share allocation plan of 2023 is dependent on achieving a CSR Index by June 30, 2025, which must be lower than that of June 30, 2023, on a comparable scope. This CSR Index measures CO_2 emissions per gigabit consumed per subscriber. 50% of the free share allocation is tied to this CSR performance, while the remaining 50% is linked to financial performance, specifically achieving a Group EBITDAaL (excluding CapEx) by June 30, 2025, that exceeds the level at June 30,2023.

GOV-4 - Statement on due diligence

Overview of due diligence steps

The table below outlines key due diligence processes and the corresponding sections in the sustainability statements. For highlights on specific due diligence mechanisms, please refer to the sections below the table.

Due Diligence Step	Description	ESRS Reference
Embedding due diligence in governance, strategy, and business model	iliad integrates due diligence into its governance and risk management framework via the Enterprise Risk Management (ERM) Policy, ensuring ESG risks are assessed at all levels of decision-making. iliad complies with anti-corruption regulations such as the Sapin II law in France, "Modello 231" in Italy, and the Polish Criminal Code. In addition, the Group adheres to duty of vigilance obligations, ensuring that parent companies identify, monitor, and mitigate human rights and environmental risks across their supply chains. The Double Materiality Assessment (DMA) framework further integrates these regulatory requirements by aligning business strategy with sustainability goals, systematically identifying impacts, risks, and opportunities.	ESRS 2: GOV-5 ESRS 2: SBM-3 ESRS 2: IRO-1
Engaging with affected stakeholders in all key steps of the due diligence	iliad maintains open communication with employees, suppliers, customers, and local communities throughout the due diligence process. The Partner Relations Charter sets clear ethical guidelines for third-party engagement, ensuring alignment with ESG commitments.	ESRS 2: SBM-2 ESRS 2: IRO-1 E1.IRO-1 E5: IRO-1 S1: ESRS 2 SBM-2 S2-4 S3-2 & S3-3 S4-2 & S4-3 G1-3
Identifying and assessing adverse impact	Through the Double Materiality Assessment, iliad evaluates environmental and social adverse impacts related to its operations and supply chain, assessing matters such as carbon emissions or labor practices. The whistleblower mechanism ensures continuous monitoring by enabling the reporting of potential issues or misconduct.	
Taking actions to address adverse impacts	iliad enforces sustainability criteria in procurement, implements a Code of Ethics and Anti-Corruption policies, and invests in initiatives to reduce environmental impact and promote diversity, inclusion, and responsible business practices.	

Overview of Enterprise Risk Management (ERM) Policy and integration of ESG considerations

The iliad Group has developed a comprehensive Enterprise Risk Management (ERM) policy to identify, assess, and mitigate risks across its entities. The ERM Policy defines roles, responsibilities, and processes for risk management, emphasizing governance, reporting, and internal controls. Additionally, iliad's ERM Policy integrates ESG risks within its risk assessment and mitigation frameworks.

Due diligence and Double Materiality Assessment

While the ESRS do not explicitly require a due diligence process, iliad's obligations under the French Duty of Vigilance law are incorporated into its Double Materiality Assessment (DMA) in terms of ensuring that ESG risks, including human rights and environmental impacts, are systematically identified, assessed, and integrated into iliad's strategic planning and sustainability goals.

The DMA process, by addressing these obligations, supports iliad in assessing, mitigating, and managing ESG risks, ensuring regulatory compliance and fostering long-term business resilience.

Additionally, it shall be noted that iliad is currently implementing its responsible procurement policy, which integrates ESG considerations and due diligence practices in line with the DMA framework. This policy specifically focuses on mitigating negative risks outlined in IROs related to S2, including hazardous working conditions, fair wages, and workers' rights within the supply chain. Further details on this policy are provided in section S-2.

Ethical policies and third-party assessment

The iliad Group has implemented a comprehensive business ethics framework to promote responsible third-party evaluation and due diligence. This includes a **Code of Ethics** that sets out commitments to non-discrimination, anti-harassment, health and safety, human rights, environmental responsibility, and ethical partner relations. Additionally, the Group has established an **Anti-Corruption Code of Conduct** and, in 2023, introduced a new brochure on **conflict-of-interest management** to provide clear guidelines for employees.

To further reinforce responsible business practices, iliad published a **Partner Relations Charter** in 2022, which defines the principles and commitments expected from both the Group and its suppliers. iliad also reviews the sustainability practices of key providers, leveraging external expertise from firms such as EcoVadis and specialized law firms to ensure comprehensive risk evaluation and responsible decision-making. Additionally, we are in progress of putting in place a responsible purchasing policy to help us meet our CSR objectives while at the same time ensuring full regulatory compliance. Sustainable development is an essential component of our purchasing policy, and we give it as much importance as we do to price and quality. In practice, this means fully integrating CSR into the purchasing process.

Furthermore, the Group is a signatory of the United Nations Global Compact and, as part of this commitment, seeks to develop partnerships—particularly with suppliers—that contribute to achieving the UN Sustainable Development Goals (UN SDGs), specifically'partnerships for the goals.

These frameworks, as indicated in the table above, are described in more detail in sections S2 and G1 of our sustainability statement in the URD.

Whistleblowing mechanism for third-party risks and due diligence

The iliad Group has established an ethical alert mechanism to detect and prevent potential risks while ensuring compliance with its internal policies and regulatory obligations. This mechanism, accessible via alerteethique.iliad.fr, provides a secure and confidential channel for submitting reports in accordance with legal requirements. More information about our whistleblowing mechanism is provided in chapter G1 below.

GOV-5 - Risk management and internal controls over sustainability reporting

Overview of risk management and internal control framework

The iliad Group's Enterprise Risk Management (ERM) Policy provides a unified approach to identifying, assessing, and managing risks across all entities, including ESG-related risks such as cybersecurity, and climate change impacts.

Risk management is overseen by the Audit Committee, ensuring alignment with the Group's risk strategy. The Chief Risk, Audit, and Compliance Officer, supported by Risk Managers at both Group and Entity levels, leads the implementation of the policy in accordance with the Three Lines Model, ensuring comprehensive integration into the Group's operations.

The Group's risk management processes consist of several interconnected stages aimed at maintaining oversight and minimizing risks:

1. **Risk identification and assessment process**

   Risks are identified and assessed annually by Risk Owners, with ongoing monitoring to detect and address significant changes.

2. **Risk mitigation**

   Once risks are assessed, mitigation measures are implemented to reduce exposure, with oversight through internal control and audit processes.

3. **Risk reporting and oversight**

   The results of risk assessments are reported to top management and the Audit Committee. Risk strategies and treatment plans are regularly validated by the Group and Entity Risk Committees.

4. **Risk monitoring and evaluation**

   Continuous monitoring ensures that risks are tracked effectively, with evaluations conducted by Risk Managers or internal audit teams to verify the accuracy of risk assessments.

   This framework is designed to protect the Group's strategic, operational, financial, and compliance objectives. Plus, business continuity plans are in place to ensure proactive oversight and adequate response to any disturbing events, especially within the network.

Aligning ERM with CSRD reporting

The CSR and risk management teams collaborate to implement a specific methodology for the Double Materiality Assessment (DMA) and the selection process for Impacts, Risks and Opportunities (IROs). This methodology is derived from the Group's existing risk management framework, which includes assessing financial impact and likelihood, and adapted to the requirements of the CSRD and the criteria of the double materiality.

Furthermore, after detailed risk analysis, advanced controls have been rolled out to reinforce robustness of data collection (e.g. identification of data owner/data source) for ESG data used in the CSRD reporting.

Finally, usual processes and risk management processes applied to regulatory reporting have been applied for CSRD reporting including review by audit and dedicated committees.

Strategy

SBM-1 - Strategy, business model and value chain

The iliad Group is a major player in the European telecommunications market. With a presence in three of the European Union's five largest countries, our CSR ambition is inextricably linked to our business objectives. The Group uses latest-generation networks, along with significant financial, human, environmental and technical resources, to support its Fixed, Mobile and Cloud services.

iliad products and services

The iliad Group provides essential telecommunications services, including mobile and fixed-line offerings, which are central to its revenue model. These services include:

- mobile telecommunications services in France, Poland and Italy providing access to 2G/3G/4G/5G networks;
- fixed-line telecommunications in France, Poland and Italy using various delivery technologies such as FTTH, ADSL and VDSL.

These services are complemented by supporting activities, including:

- design and manufacturing of in-house modems (Freebox in France and iliadbox in Italy) for fixed-line Internet access;
- retail operations and customer support network in France, Poland and Italy, including online support services, physical stores and self-service SIM card dispensers;
- sale/leasing of phones and other devices as part of the mobile subscriptions offering.

The iliad Group also delivers digital services with a focus on B2B offerings, including:

- cloud and hosting solutions delivered by subsidiaries Scaleway, Free Pro and OpCore. Solutions include dedicated hosting, colocation, Public Cloud and AI solution management;
- cybersecurity solutions delivered by iliad's subsidiary ITrust;
- payment solutions delivered by Stancer;
- video streaming solutions delivered by Redge Technologies.

The Company is involved in the rollout, operation and maintenance of network infrastructure, which is vital for service delivery. Infrastructure operated by iliad includes optical fiber Backbone transmission networks, fixed-line networks and local loops, mobile network infrastructure and digital infrastructure such as data centers.

Scope of our business model

iliad GROUP

Mobile population
164 million
households

Broadband and Ultra-Fast Broadband population
61 million
households

France

99.9%
3G coverage rate of the population

99.5%
4G coverage rate of the population

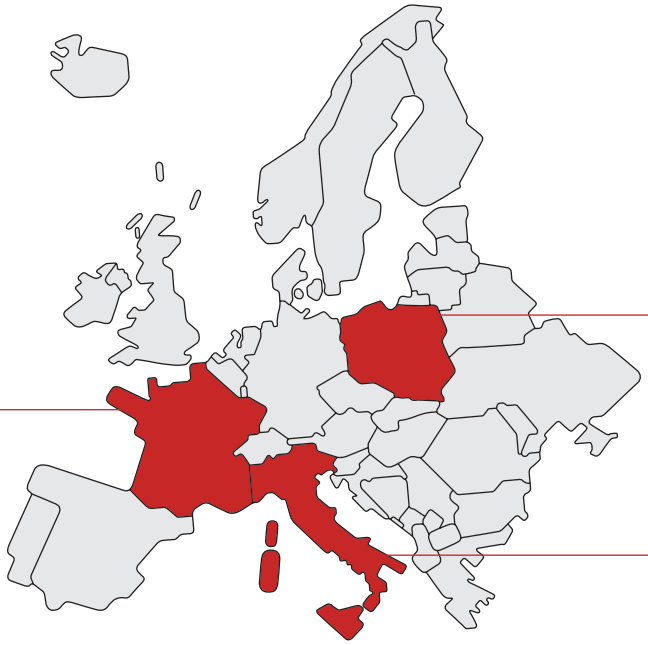
94.2%
5G coverage rate of the population

38.3 million
connectible fiber optic sockets

>31,000
municipalities covered by our Fiber offerings

8 datacenters
operated directly by our teams

Main subsidiaries: Free, Free Mobile, Scaleway, Free Pro, Free Distribution



Poland

99.6%
4G coverage rate of the population

9.6 million
households covered by our Ultra-Fast Broadband offerings

>22,000
municipalities covered by our Fixed offerings

6 datacenters
operated directly by our teams

Main subsidiaries: Play, 3S, Redge, Vortanoria, Phobos

Italy

>99%
4G coverage rate of the population

16.1 million
households covered by our Ultra-Fast Broadband offerings

>7,000
municipalities covered by our Fixed offerings

Main subsidiary: iliad Italia

Our strategy

From the very beginnings of the iliad Group, network rollouts and regional digital development have always been key priorities for us. In order to anchor our market positions for the long term and retain our competitive edge, we have based our strategy on three strategic pillars:

- **straightforward and accessible offerings.** We invent solutions that allow everyone to access digital technologies easily and at affordable prices. We firmly believe that the starting cost of these offerings must be as fair as possible for consumers, and our pricing policy was a game-changer in the French telecoms market;
- **our own networks right across the country**, and in partnership where standalone rollout does not make economic sense. We believe that everyone should have access to our communication technologies regardless of where they are. That's why we chose to develop Fixed and Mobile infrastructure covering all geographic areas, both urban and rural, with the same prices applying everywhere;
- **an organization underpinned by diversity and openness.** We see digital as a universal language and the Internet as a way of bringing individuals together. This vision is embodied in the incredible diversity of our teams. We also take care to make sure everyone finds their place at iliad by favoring autonomy and empowerment rather than a rigid hierarchical structure.

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

Our resources

Financial capital	Industrial capital	Intellectual capital	Human capital
• At end-2024, 96,27% of iliad's shares were indirectly owned by the Niel family group, with the remaining shares held by Group employees and executives. • Equity: **€4.9 billion**.	• Nearly **60,000** active mobile sites in Europe (more than **29,000** in France, **18,400** in Italy including the Zefiro joint venture with WindTre, nearly **12,400** in Poland). • **49.0 million** households covered by our FTTH offers in France and Italy, and **9.6 million** households covered by our HFC/FTTx offers in Poland. • **€2.0 billion** in net investments excluding licenses in 2024, **€2.2 billion** including licenses. • Net value of licenses: **€4.8 billion**. • Net value of network equipment: **€7.9 billion**.	• Free was included in the **50** most valued brands in France, according to Brand Finance. • Owner of the Freebox operating system. • The iliad Group is the most attractive telecom brand in Italy (BVA Doxa, Q4 2024).	• More than **18,400** employees in Europe and Morocco, 92% of whom have permanent work contracts. • More than **4,800** employees in our contact centers. • More than **1,600** employees in our distribution network in France. • Constant growth in the workforce over the past 14 years. • The Free Foundation is working to make digital technology available to as many people as possible.

Our employees, subscribers, suppliers, partners and institutions, as well as our investors all play a role in creating and sharing value.

Impacts of our business model

Strong market positions	Commercial success	High-quality brand identity and service	A contributor to society	Environmental commitments & performance
• Group revenues of **€10.0 billion** (up 7% on a pro forma like-for-like basis). • EBITDAaL of **€3.9 billion** (**up 10%** on a pro forma like-for-like basis). • **50.5 million** subscribers in Europe, of which **40.5 million** mobile and **10.0 million** fixed. • **6.2 million** fiber subscribers in France (no. 1 after the incumbent operator).	• **2.0 million** new subscribers in Europe, of which: – **+1.0 million** in Italy, – **+0.7 million** in France, – **+0.3 million** in Poland.	• Free ranked **no. 2** in 2024 for Fixed-line performance in the nPerf survey. • iliad Italia ranked no. 1 for fiber speed in the nPerf survey. • Play ranked as Poland's leading brand in the Technology and Communications category. • More than **26.4 GB/ month** of data per 4G/5G subscriber in France [(1)]	• More than **700** net new hires in 2024 in France. • **€717 million** in payroll costs in 2024, up 15% year on year. • A leading corporate taxpayer in France, with **€379 million** paid in 2024.	• **SBTi-validated carbon targets** (1.5°C by 2030, Net-Zero by 2050) • **Ecovadis Gold medal** for iliad and Free Pro and **CDP score** B for 2024 • **2,630** tonnes of materials from Freebox recycled in France, including **569** tonnes of plastic (**1,067** tonnes in 2023) • ISO 27001 and HDS certification of our data centers in France + ISO 50001 for the Scaleway data centers

(1) Change of methodology – 2022 baseline year: 22 GB vs. 20 GB.

Sustainability strategy

The Group's sustainability strategy is structured around three key pillars:

1. **Environmental Responsibility –** Reducing resource consumption, improving energy efficiency, and fostering a circular economy.
2. **Social Commitment** – Ensuring workplace safety, fair labor practices, and fostering diversity, equity, and inclusion across our operations and supply chain.
3. **Ethical & Responsible Business –** Strengthening governance, transparency, and responsible procurement.

Aligned with **ESRS requirements**, our strategy ensures comprehensive disclosure on material topics. More details on our strategy and focus areas can be found below.

iliad's three pillars of sustainability strategy

Pillar	**Building an Environmentally Responsible Digital World**	**Supporting the People Who are Building the Digital World of the Future**	**Helping Create a Useful, Responsible, and Trusted Digital World**
Related ESRS	**E1, E3, E5**	**S1, S2**	**S3, S4, G1**
Main activities/ impact	• Reduce energy consumption for all iliad activities • Reduce water consumption for data center activities • Develop circular economy for multiple activities (e.g. eco-design and efforts to extend the lifespans of its devices, such as Freebox and mobile phones)	• Ensure employee health, safety, and wellbeing • Support talent development and skills enhancement, and foster strong employee engagement and social dialogue • Ensure workplace safety and well-being in the supply chain • Promote DEI (Diversity, Equity, and Inclusion) • Guaranteeing fair wages and labor rights in the supply chain	• Reduce digital divide by offering fair and transparent pricing, and promote privacy and data security • Ensure Ethical Business Conduct • Uphold strong ethics and compliance programs and practices • Enhance Transparency and Accountability • Strengthen corporate governance • Support Community Programs and Encourage Employee Engagement • Promote Responsible Procurement • Ensure traceability in the supply chain
Related group of product/geo ...	• All products • All geo • B2C and B2B clients (some impacts to reduce resource consumption such as low electicity consumption Freebox)	• All products • All geo • B2C and B2B client • Supply Chain	• All products, mainly mobile and box for digital divide • All geo • Mainly B2C clients • Supply Chain

Sustainability strategy: building an environmentally responsible digital world

The 2024 Planetary Health Check report, led by the Potsdam Institute for Climate Impact Research, warns that climate change is reaching a critical tipping point. The global average temperature had already reached +1.45°C above pre-industrial levels in 2023. The report emphasizes that limiting global warming to 1.5°C - as targeted in the Paris Agreement - is still technically possible, demanding urgent, coordinated action.

For iliad, it is essential to reduce emissions rapidly and significantly to halve global emissions by 2030 and achieve Net Zero emissions before 2050.

In January 2021, the Group made ten climate pledges to align its objectives with the targets set in the Paris Agreement on climate change. In February 2024, SBTI validated the Group's carbon reduction pathway comprising its emissions reduction targets for the short term (for 2030) and its Net-Zero Standard targets (for 2050). To enable us to more effectively manage our roadmaps, we have also set intermediate milestones along our carbon reduction pathway.

In all our entities, our teams implement measures to reduce our energy and electricity consumption – a primary decarbonization lever in our carbon reduction strategy. For iliad, renewable energy is a key element of decarbonization roadmap as it enables us to take action on our Scopes 1 and 2 emissions. We are dedicated to fostering the development of renewable energy capabilities in our three core regions. The Group pledged that 100% of its direct electricity consumption would come from renewable sources as from 2021 and this objective was reached in France and Italy, with Poland achieving it in 2023.

In addition to climate change, we seek to limit other environmental impacts of digital technology and its usage – such as waste production, water consumption and abiotic resource depletion (minerals and metals).

It shall be noted that according to recent studies from ADEME[1] (The French Agency for Ecological Transition) the digital footprint in France is mainly divided between three areas: devices (50%), data centers (46%) and networks (4%).

These figures show how the Group needs to work towards reducing the environmental impact of its activities, particularly in terms of controlling our materials-related footprint and minimizing the impact of our products through eco-design.

Water consumption is of low materiality for the Group's direct business, but we are seeing rapid changes in the availability of this resource in the geographies where we operate, which in turn is leading to a rapid increase in the related risk especially for data centers activities. In addition, the production of electrical and electronic equipment consumes significant quantities of this scarce resource.

Supporting the people who are building the digital world of the future

As a key player in the European telecommunications market, the Group contributes to job creation by creating jobs, skills development and promoting diversity in tech. Diversity is in the Group's DNA, reflecting our history founded on innovation and inclusion.

Beyond their impact on people, businesses, and nations, our projects for deploying resilient telecom infrastructure and data centers play a key role in job creation and skill development. To meet its deployment targets, the Group relies on a skilled workforce and invests in skills-building and training. The Group is an innovation driver in communication and information technologies. Our investments in new technology R&D stimulate economic growth and create jobs in fields such as tech and engineering.

By connecting underserved populations, particularly in rural areas, we are helping to bridge the digital divide and are creating job opportunities, therefore contributing to inclusive economic growth and promoting digital inclusion.

Despite the current complex economic and geopolitical context, the Group has an ambitious HR policy focused on creating jobs, recognizing and rewarding both individual and collective performance and encouraging career development and in-house skills-building.

In France, we have created more than 4,100 net jobs since 2020 of which more than 700 in 2024 alone. Overall, we employ 18,411 people (the majority in Europe), including over 11,800 in France.

- **Breakdown of workforce by geographic area**

	At Dec. 31, 2017	At Dec. 31, 2018	At Dec. 31, 2019	At Dec. 31, 2020	At Dec. 31, 2021	At Dec. 31, 2022	At Dec. 31, 2023[a]	At Dec. 31, 2024[a]
Number of employees based in France	7,731	7,812	8,603	9,134	9,681	10,162	11,161	11,879
Number of employees based outside France	1,980	2,316	2,496	5,588	5,398	6,562	6,711	6,532
o/w Italy	*76*	*311*	*458*	*624*	*694*	*812*	*1,043*	*1,126*
o/w Morocco	*1,904*	*2,005*	*2,038*	*1,949*	*1,805*	*1,478*	*1,459*	*1,334*
o/w Poland	-	-	-	*3,015*	*2,899*	*4,272*	*4,209*	*4,072*
Total workforce	**9,711**	**10,128**	**11,099**	**14,722**	**15,079**	**16,724**	**17,872**	**18,411**

(a) Including the Group's joint ventures and the subsidiary, ITrust, acquired in 2023.

(1) ADEME (2025) https://infos.ademe.fr/magazine-janvier-2025/numerique-quel-impact-environnemental-en-2022/

- **Breakdown of workforce by job type (including Poland since 2021)**

	At Dec. 31, 2018	At Dec. 31, 2019	At Dec. 31, 2020	At Dec. 31, 2021	At Dec. 31, 2022	At Dec. 31, 2023[(a)]	At Dec. 31, 2024[(a)]
Subscriber relations	43%	40%	35%	25%	25%	30%	29%
Network/Technical/IT	51%	55%	57%	53%	53%	43%	48%
Retail	4%	6%	6%	16%	17%	19%	18%
Other	2%	2%	2%	5%	5%	8%	5%

(a) Including the Group's joint ventures and the subsidiary, ITrust, acquired in 2023.

Helping create a useful, responsible and trusted digital world

Right from the outset, iliad has been driven by an overriding objective of giving everyone access to the best digital technologies. This has led to a unique sales policy, based on core values such as generosity and transparency. But it also means serving entire geographies without any gaps in coverage and offering the same prices everywhere.

With over **50.5 million** subscribers in Europe, served by 18,411 employees, the Group is a leading economic player, and must set the standard in terms of business conduct. Whether in terms of business law, citizens' rights or relationships with our suppliers, we are committed to a process of continuous improvement in our compliance standards.

As a driver of the digital innovation, iliad has always fought for consumer rights, both in terms of ensuring they pay a fair price for telecom services and that their personal data is protected. This has been embodied in our corporate citizenship, backed up since 2006 by the Free Foundation.

Value chain

Regarding **iliad's value chain**, please refer to the **Impact, Risk, and Opportunity management** section below, which includes an illustrative overview.

Country restrictions

The iliad Group's telecommunication and digital services are generally not subject to prohibitions, as they do not pose inherent risks requiring regulatory bans. However, they may face local restrictions – related to all digital services providers. Thus, some of our services might face restrictions in certain countries due to local laws, censorship, or licensing issues: VoIP services, Mobile roaming, streaming services, VPNs, or open Internet access. Freebox TV and replay services might be geo-blocked outside Europe as platforms like Youtube, Netflix, or Prime Video may be inaccessible in some nations.

SBM-2 - Interests and views of stakeholders

Stakeholder engagement and integration into governance

Aligned with CSRD framework, our Double Materiality Assessment actively engages stakeholders to identify key ESG topics, as outlined below. iliad's governance structure is strengthened by a comprehensive stakeholder engagement process, involving interviews and surveys to evaluate material issues.

To sustain strong connections within our ecosystem, we engage through various communication channels tailored to the specific needs of each stakeholder group. Actively consulting with stakeholders enables us to better understand their expectations and concerns, ensuring we can operate effectively and foster mutually beneficial relationships. This includes engaging customers, employees, partners, regulators, and the broader community through structured feedback mechanisms, collaborative forums, and transparent dialogue.

Stakeholder	Key dialog and interaction channels
Human capital • Employees • Employee representative bodies • Job candidates • Interns, work-study students	The Group's people are its greatest asset. We therefore place great importance on nurturing their engagement and ensuring the long-term appeal of our employer brand. To that end, the Group maintains constructive dialog and close relationships with its employees. We conduct annual pulse surveys to gather employee's feedback on key HR topics. We also conduct a continuous and direct dialogue with employees through workshops, managerial discussions and employee performance and career reviews. The Group is also strictly complying with all local labor regulations regarding social dialogue and employee representative bodies' information and consultation. The Group works closely with the educational establishments that teach and train the talent of tomorrow.
Subscribers • B2C subscribers • B2B subscribers	At all levels of the organization, we prioritize building long-term relationships with our subscribers, ensuring continuous and close communication. We maintain regular contact through various channels, including customer service, feedback surveys, and dedicated service teams. We also engage in in-depth discussions with subscribers and communities to fully understand their needs and expectations. For example, through conventions like #conventionFree, subscribers can submit questions for a Q&A session, providing valuable opportunities for direct dialogue and feedback. Our goal is to provide exceptional service quality, resolve issues promptly, and drive ongoing improvements based on customer feedback.
Financial players • Bondholders • Banks • Financial analysts • Rating agencies	The Group keeps up a steady stream of dialog with financial players, providing them with transparent, high-quality information about its strategic choices and its business. These exchanges help us to understand and anticipate their expectations, particularly in terms of environmental, governance and social performance. We also respond to the questionnaires issued by the main financial and non-financial rating agencies.
Suppliers and subcontractors	The Group maintains long-term, sustainable partnerships with key suppliers exchanges through mechanisms such as: • **Supplier Platform (from April 1, 2025):** A centralized tool for onboarding, compliance checks, and ongoing communication; • **Direct Dialog**: Regular meetings with suppliers to drive innovation and CSR improvements; • **Risk-based Supplier Selection**: Suppliers are chosen based on CSR performance, assessed through due diligence and risk mapping. Outcomes from supplier engagement inform procurement decisions, materiality assessments, and operational strategies.
Public authorities	The Group strictly respects all the applicable regulations and ethical rules wherever it conducts business. Thanks to our strong regional presence, we have a steady stream of dialog with regulators, and we are in regular contact with local authorities. We ensure that we provide transparent and reliable regulatory information.
Partners • Industry bodies • Universities and colleges • Start-ups	We operate in a wide ecosystem in which it is vital to anticipate major social trends and bring on board new expertise. The Group is a member of various trade associations such as the GSMA and participates in joint working groups with organizations such as ARCEP, AFEP, ADEME and UNGC.
Civil society • Local communities • Media and journalists • NGOs and non-profits	The Group implements measures to build up relations of trust with society at large. For example, we actively participate in public information meetings to discuss local issues. We encourage our employees to get involved in local projects led by charities and other non-profits thanks to the activities of the Free Foundation. We also participate in think-tanks working towards a low-carbon economy and responsible digital technology, notably the French partner organization of the World Business Council for Sustainable Development (*Entreprises pour l'Environnement* – EPE).

SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model

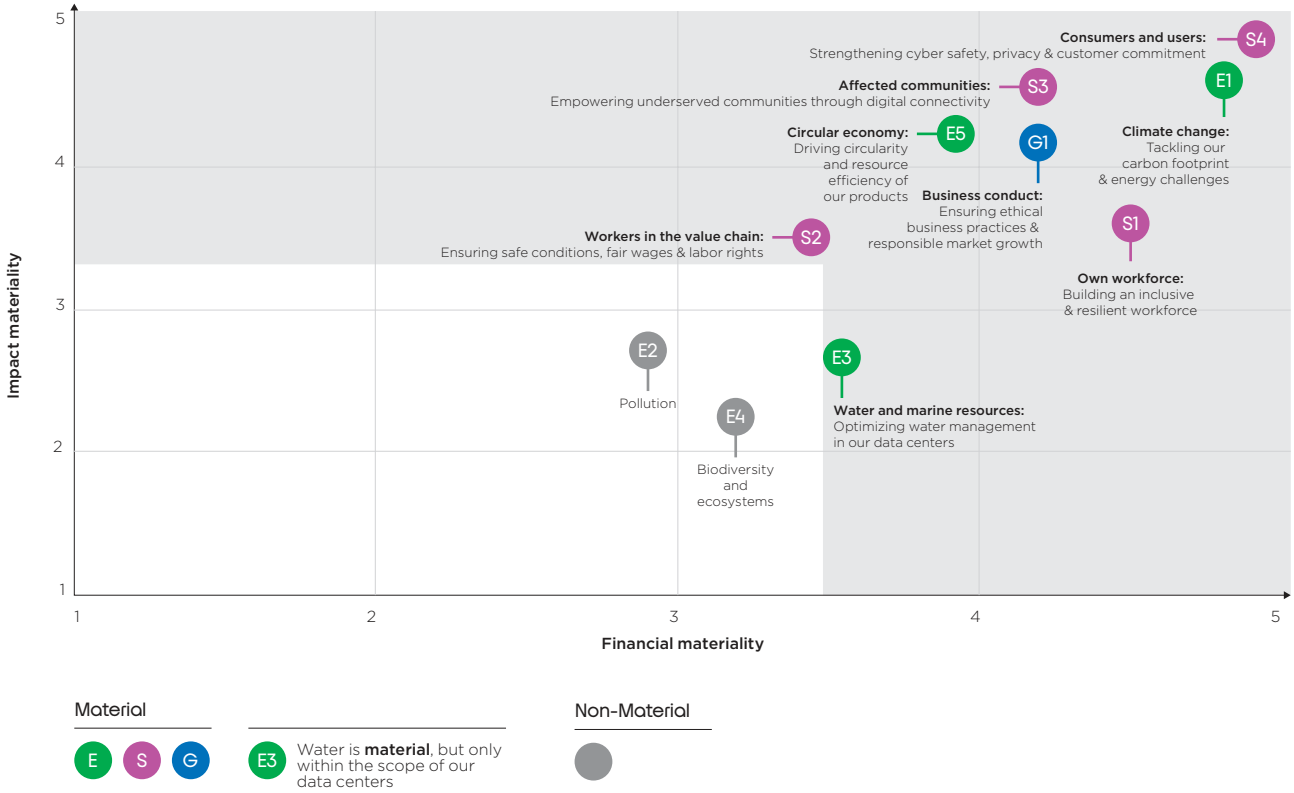
The IROs are presented hereafter:

	ID	IRO type	IROs	Time horizon
ESRS E1	1	Negative Impact	Contribution to climate change through GHG emissions from iliad's own operations and from operations on its value chain	Short term
	2	Negative Impact	Use of energy-intensive processes leading to resource consumption	Short term
	3	Risk	Financial risk due to energy consumption, energy price volatility and expenses necessary for energy-efficient upgrades	Medium term
	4	Risk	Exposure to climate-related physical risks	Short term
	5	Risk	Reputational and regulatory risk linked to iliad's carbon footprint	Medium term
ESRS E3	6	Risk	Operational risk due to high water consumption by data centers	Medium term
	7	Negative impact	Negative image due to high water consumption of data centers	Medium term
ESRS E5	8	Opportunity	Sharing, reusing and recycling hardware to reduce costs and attract clients in search of sustainable products	Short term
	9	Negative Impact	Resource depletion and waste production due to hardware manufacturing and end of life	Short term
ESRS S1	10	Risk	Lack of attractiveness due to underrepresentation of women in technical and leadership roles	Short term
	11	Risk	Increased turnover and loss of productivity due to poor employee wellbeing, wages and benefits	Short term
ESRS S2	12	Negative Impact	Exposure to hazardous working conditions in iliad's supply chain, leading to workplace accidents and health issues.	Short term
	13	Negative Impact	Barriers to fair wages and unionization, restricting workers' rights and reducing fair compensation.	Medium term
ESRS S3	14	Positive Impact	Access to telecommunication and digital services for underserved or vulnerable populations, including access to political information and engagement tools	Short term
ESRS S4	15	Negative Impact	Access to harmful online content causing psychological harm	Short term
	16	Positive Impact	Provision of affordable and innovative services leading to more inclusivity and accessibility	Short term
	17	Risk	Financial risk linked to loss of customers due to poor customer service	Short term
	18	Risk	Financial and reputational risks linked to data collection and data and privacy breaches/cyber security	Short term
ESRS G1	19	Risk	Exposure to corruption and bribery risks	Short term
	20	Opportunity	Infrastructure investment and market expansion through political engagement	Medium term

In this report, we have included our materiality matrix which is the basis of our current sustainability framework, developed through stakeholder engagement in 2024 and the years before. Material issues included in this report determine the priorities in our sustainability strategy, actions, and related targets.

2024 Double Materiality Matrix

The matrix below visualizes material sustainability topics, encompassing IROs and their corresponding ESRS topic.



In the existing assessment, pollution (E2) and biodiversity (E5) are not considered material for the iliad Group. As outlined in IRO-1, the Double Materiality Assessment involved senior and top management to validate the materiality of potential ESRS. It shall also be noted that water resources are considered as material only within the scope of iliad's data centers activities.

Impact, risk and opportunity management

IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities

Robust approach as the Foundation for Double Materiality Assessment

To identify material IROs, iliad initiated a Double Materiality Assessment in 2024 starting with the identification of our value chain enabling us to focus on key areas and stakeholders. An internal pre-analysis of IROs was conducted based on internal and external analysis. Local teams and business units from countries were then consulted to provide additional insights and validate the analysis.

Afterward, more than 150 impacts, risks and opportunities were identified during dedicated workshops. Broader consultations with stakeholders involved gathering feedback from internal and external contributors to refine and validate the findings.

A benchmarking phase was undertaken, comparing the results with market practices and standards. The DMA calculations were carefully validated to ensure their accuracy and reliability. A final validation for IROs, close to the materiality threshold, was performed with top management.

Value chain analysis

The starting point of the approach has been an assessment of iliad's value chain, as illustrated below. The value chain analysis was enriched by geographies and business lines during the analysis. A mapping of material IRO with value chain has been performed too.

ID	IRO type	IROs
1	Negative Impact	Contribution to climate change through GHG emissions from iliad's own operations and from operations on its value chain
2	Negative Impact	Use of energy-intensive processes leading to resource consumption
3	Risk	Financial risk due to energy consumption, energy price volatility and expenses necessary for energy-efficient upgrades
4	Risk	Exposure to climate-related physical risks
5	Risk	Reputational and regulatory risk linked to iliad's carbon footprint
6	Risk	Operational risk due to high water consumption by data centers
7	Negative impact	Negative image due to high water consumption of data centers
8	Opportunity	Sharing, reusing and recycling hardware to reduce costs and attract clients in search of sustainable products
9	Negative Impact	Resource depletion and waste production due to hardware manufacturing and end of life
10	Risk	Lack of attractiveness due to underrepresentation of women in technical and leadership roles
11	Risk	Increased turnover and loss of productivity due to poor employee wellbeing, wages and benefits
12	Negative Impact	Exposure to hazardous working conditions in iliad's supply chain, leading to workplace accidents and health issues.
13	Negative Impact	Barriers to fair wages and unionization, restricting workers' rights and reducing fair compensation.
14	Positive Impact	Access to telecommunication and digital services for underserved or vulnerable populations, including access to political information and engagement tools
15	Negative Impact	Access to harmful online content causing psychological harm
16	Positive Impact	Provision of affordable and innovative services leading to more inclusivity and accessibility
17	Risk	Financial risk linked to loss of customers due to poor customer service
18	Risk	Financial and reputational risks linked to data collection and data and privacy breaches/cyber security
19	Risk	Exposure to corruption and bribery risks
20	Opportunity	Infrastructure investment and market expansion through political engagement

It should be noted that throughout all stages of the **Double Materiality Assessment**, multiple stakeholders were involved across all geographies and throughout the value chain. Over **70 interviews** were conducted, with a total of c. **40 internal and 30 external** interviews **in France, Italy and Poland** (including **suppliers**, **clients**, **NGOs**, **trade unions**, **business partners**, and independent **experts)**. Regarding supplier surveys, more than **50** responses were collected.

Internally, many Top Managers, including the CEO, were interviewed, representing the entire activity of **iliad**. The stakeholders involved in the Double Materiality Assessment have been carefully selected based on their expertise in various fields:

- **Climate**: e.g. providers specializing in energy, representatives from telco associations, and public authorities – on top of SBTi experts/external agency who liaise with iliad on regular basis;
- **Biodiversity**: Specialists in biodiversity from TNFD;
- **Water**: Professionals with expertise in data center operations and water management;
- **Circular Economy**: service providers and representatives from NGOs;
- **Social**: experts from trade unions and NGOs focusing on social issues;
- **Workers in the Value Chain**: Key participants include providers (e.g., hardware suppliers) and customers;
- **Customer/Community**: NGOs advocating for children, women, and client communities have been involved;
- **Investors and bankers**: iliad maintains regular communication with financial stakeholders, providing insights into its strategy and performance, including ESG factors;
- **Governance**: compliance officers and journalists were consulted.

Calculation methodology

The assessment and quantification of IROs were conducted using a consistent methodological framework. This process was supported by extensive documentation, including internal and external sources (e.g. previous analyses, URDs, and surveys – ADEME, ARCEP publications and IPCC studies).

The risk scale used for risk assessment ranged from 1 to 5, in alignment with the internal risk methodology (gross risk, before mitigation). **IRO quotations** were assessed through interviews and surveys. During the interviews, the methodology was explained in advance, and participants were given the option to provide a single score or allocate scores across various factors. The collected data was then consolidated by weighting responses based on stakeholders' expertise (self-assessed) and the method of data collection, with higher weights assigned to interviews and experts. Results were subsequently aggregated at the topic and sub-topic levels aligned with ESRS.

For sub-topics with scores between 3 and the average, which were considered potentially material, a review was conducted with top management to finalize the validation of material IROs and topics near the threshold.

Time horizons were defined according to the standard internal risk management methodology. Default time horizons were mainly applied based on ESRS guidelines. For more details, please refer to BP-2 in ESRS 2.

4.3 E1 - Climate change

According to a joint ADEME-ARCEP report published on November 25, 2024, the carbon footprint of digital technology [(1)] in France could increase by 45% by 2030 without efforts to control it [(2)]. With that in mind, at iliad, we are committed to achieving carbon neutrality. This commitment is reflected in our climate actions and **ESRS E1** disclosures where we address the areas of:

- **Governance**: Integrating sustainability performance into incentive schemes and oversight of climate action;
- **Strategy**: Defining our future transition plan ambition for climate change mitigation and alignment;
- **Impact, Risk and Opportunity Management**: Managing climate-related IRO's (see table below);
- **Metrics and Targets**: Tracking energy consumption, GHG emissions, and financial impacts of climate risks.

(1) Digital technology refers to a combination of infrastructure (telecom networks, data centers), hardware (telephones, computers, Internet boxes) and services (content, applications, software, etc.).
(2) IT4Green: *évaluation environnementale des effets directs et indirects du numérique pour des cas d'usage – La librairie ADEME.*

Following the **DMA** outlined in ESRS 2, this will be done in relation to the following impacts and risks related to climate change:

ID	IRO type	IROs	VC location	Time horizon
1	Negative Impact	Contribution to climate change through GHG emissions from iliad's own operations and from operations on its value chain	Own Operations and Upstream Activities	Short term
2	Negative Impact	Use of energy-intensive processes leading to resource consumption	Own Operations and Upstream Activities	Short term
3	Risk	Financial risk due to energy consumption, energy price volatility and expenses necessary for energy-efficient upgrades	Own Operations and Upstream Activities	Medium term
4	Risk	Exposure to climate-related physical risks	Own Operations, Upstream and Downstream Activities	Short term
5	Risk	Reputational and regulatory risk linked to iliad's carbon footprint	Own Operations, Upstream and Downstream Activities	Medium term

Governance

E1.GOV-3 - Integration of sustainability-related performance in incentive schemes

In line with ESRS requirements, the following governance section focuses on the integration of sustainability-related performance—particularly climate-related metrics—into incentive schemes. It should be read in conjunction with the broader GOV sections of ESRS 2. This framework is supported by key governance bodies, including the **Board of Directors, the Audit Committee, the CSR Committee, and the Compensation Committee**, which ensure oversight and alignment with sustainability objectives.

ESG performance criteria in stock grant plans

iliad uses free share granting plans as a mechanism to incorporate sustainability into the remuneration of a pool of Top Managers and employees, including the Group CEO. A condition for 2023 stock grant plan is tied to a Sustainability KPI, which requires a reduction of CO_2 emissions per gigabit consumed during the observation period compared to the previous period. Extra-financial performance carries equal weight (50%) with financial performance (50%) in determining the final acquisition of free shares. More information is available in ESRS 2.

At this stage, iliad has not yet systematized the integration of ESG performance criteria into the remuneration of employees, including members of administrative, management and supervisory bodies.

Strategy

E1-1 - Transition plan for climate change mitigation

The iliad Group has not yet finalized its transition plan for climate change mitigation, however, the plan is currently being developed and will be disclosed progressively. Several components of the transition plan have already been identified and will be presented throughout this section.

Background: our founding commitments

For many years, the iliad Group has been dedicated to reducing the environmental footprint of its activities and its value chain, including its Fixed and Mobile networks, data centers and the logistics processes used for producing its Freebox.

In 2021 the Group took the decision to press forward the fight against global warming by announcing its 10 climate pledges, the outcome of two years' work involving around 80 employees and the assistance of Carbone 4, consultancy and other experts. These pledges, supported by concrete initiatives, form the foundation of iliad's climate strategy:

1. Invest €1 billion over 15 years;
2. Improve the energy efficiency of our fixed and mobile networks;
3. Ensure our data centers have advanced environmental performance;
4. Further enhance the environmental performance of our Freebox.
5. Deploy an environmentally friendly sale strategy;
6. Deploy a responsible procurement policy;
7. Reduce emissions generated by our vehicle fleet;

8. Help create more renewable energy capacity;
9. Invest in carbon sinks;
10. Set up a climate performance tracking system.

We recognize that achieving these goals require **a coordinated and systemic approach** with focus on mobilizing our resources, transforming our businesses, communicating transparently to ultimately contributing to global carbon neutrality.

Regarding the latter, a crucial step in any greenhouse gas reduction plan is to identify the main sources of emissions across the business. In line with the GHG Protocol and guidelines issued by ADEME (French Agency for Ecological Transition), iliad has structured its strategy around three key principles, addressing GHG emissions across Scope 1, Scope 2, and Scope 3:

1. Minimizing direct emissions (Scope 1 & Scope 2) by enhancing energy efficiency in our operations, prioritizing low-carbon energy sources, and increasing the use of electricity from renewable sources.
2. Reducing indirect emissions and energy consumption across the value chain (Scope 3) by collaborating with strategic partners to lower their operational emissions and implementing more efficient transport methods.
3. Offsetting residual emissions that cannot be avoided, ensuring a long-term approach to carbon neutrality across all scopes.

As detailed in the following sections, this approach directly shapes the Group's GHG emission reduction targets and alignment with Paris Agreement, ensuring its commitments support the global goal of limiting global warming. These efforts are supported by targeted **investments and funding for climate actions** and an analysis of **management of locked-in GHG emissions**.

To reinforce our commitment to climate action and the core pillars of a future climate transition plan, iliad is, in the following sections, disclosing its taxonomy analysis, as required by EU regulations, identifying sustainable activities. Furthermore, we will outline our positioning on the integration of climate actions into business strategy and financial planning, as well as our alignment with EU Paris-aligned benchmarks.

Before detailing these sections, it is important to highlight that beyond efforts to mitigate climate change, iliad is also addressing climate-related physical and transition risks identified within the DMA framework. To support this, the iliad Group initiated a resilience analysis with EcoAct at the end of 2024, with the goal of deepening its understanding of climate risks and enhancing the resilience of its operations. While first results of this initial analysis are disclosed in this report, the assessment remains ongoing and full results, especially regarding assets geographical analysis will be published next year.

GHG emission reduction targets and compatibility with the Paris Agreement

A key priority for iliad has been to set GHG emission reduction targets. As such, establishing science-based climate targets in line with The Science Based Targets initiative (SBTi) is an integral part of iliad's climate roadmap. We can observe that SBTi has become the benchmark for companies to set credible targets to address the climate crisis. The minimum ambition for short-term targets is to limit global warming to well below 2°C, while companies are encouraged to set 1.5°C targets and commit to long-term Net-Zero trajectories.

Building on this commitment of becoming SBTi aligned, in end of June 2023, we submitted our carbon emissions reduction pathway and targets to the SBTi for validation. In this submission, the Group raised its objectives by undertaking to align its Scopes 1 and 2 and relevant Scope 3 emissions with a 1.5°C pathway in the short term (by 2030) and with the SBTi's Net-Zero Standard by 2050.

In February 2024, the SBTi approved iliad's short-term and Net-Zero Standard GHG emissions reduction targets. The commitments were validated by the SBTi based on the following terms:

- the iliad Group commits to reduce absolute Scope 1 and Scope 2 GHG emissions by 60% by 2030 from a 2022 base year. The Group also commits to reduce absolute Scope 3 GHG emissions by 46% by 2030 from a 2022 base year;
- the iliad Group commits to reduce absolute Scope 1 and Scope 2 GHG emissions by 90% by 2050 from a 2022 base year. The Group also commits to reduce absolute Scope 3 GHG emissions by 90% by 2050 from a 2022 base year.

SBTi's validation attests that the greenhouse gas emission **reduction targets set by iliad are compatible with achieving the objectives of the Paris Agreement**, decided at COP21 in December 2015, to limit global warming to +1.5 degrees by 2050.

GHG emission reduction targets and decarbonization levers

To reach its ambitious GHG emission reduction targets, iliad has identified various **decarbonization levers** as presented below. It shall be noted that these levers are further detailed throughout the CSRD chapters with references provided below for clarity.

Increasing the energy efficiency

Telecom networks account for most of the Group's electricity consumption: 88% of the Group's direct GHG emissions in 2024 (Scopes 1 and 2, location-based). In view of the sharp rise in usage and data traffic, all the players in the industry expect to see a future increase in their networks' overall electricity usage. Reducing these emissions is therefore a top priority for iliad which has implemented several actions including lowering the energy consumption of fixed and mobile networks and optimizing energy use in data centers.

For more information, please refer to sections E1-2, E1-3, E1-4 and E1-5.

Growing use of renewable energies

Besides controlling its energy consumption, iliad is also promoting the use and development of renewable energies. Total renewable energy share is projected to increase from 62% in 2024 to 95% in 2030 and 100% in 2050. Opting for low-carbon energies enables the group to optimize its carbon footprint.

For more information, please refer to sections E1-2 E1-3, E1-4, E1-5 and E1-6.

Minimizing the products' impact and the use of resources

Activating this lever involves several types of action, such as developing eco-design approach, multifunctionality, integrating environmental criteria in the supplier selection process and working closely with component manufacturers to reduce the boxes energy consumption. The Freebox, iliad's flagship product, is designed, engineered, and managed entirely in-house by a dedicated team, integrating circular economy principles.

For more information, please refer to section E5 addressing the issue of circular economy.

Managing the environmental impacts of the supply chain

Reducing the products' environmental impact requires closer control of the supply chain, both upstream and downstream. As part of iliad's climate ambition, iliad sets the goal of rethinking its entire supply chain to optimize it. Several actions are currently ongoing with key network infrastructure providers.

For more information, please refer to section E1-3.

Optimizing the modes of transport

iliad's vehicle fleet represents the main lever to reduce Scope 1 emissions as it accounts for 80% of Scope 1 emissions and 4.1% of the Group's Scope 1 and Scope 2 emissions combined. The Group has implemented several actions aimed at reducing the fleet impact, such as optimizing travel, optimizing the management of our vehicle fleet or renewing the fleet and switching from combustion engines to electric vehicles while limiting its size.

Other actions have been undertaken, such as optimizing transport to and from logistics sites, favoring low carbon means of transport through a multimodal transport mix and optimizing delivery logistics.

For more information, please refer to section E1-2, E1-3, E1-4 and E1-5.

Developing carbon sink projects

iliad is committed to contributing to global carbon neutrality by offsetting the emissions that cannot be avoided in France, Italy and Poland. Therefore, the group is investing in the development of carbon sinks to enhance natural reservoirs like forests, focusing on biogenic methods.

For more information, please refer to section E1-7.

Investments and funding for climate actions

Context

iliad's climate strategy from 2021 involves organization-wide commitment, with significant resources dedicated to ensuring its success. As part of this strategy, iliad pledged to invest €1 billion over the next 15 years. This investment commitment remains active and was solidified through the development of a **Green Financing Framework** in 2024. Given that the Taxonomy Regulation (EU) 2020/852 currently excludes core telecom activities, this framework was developed to guide iliad's green investments. The Framework was then concretized through the issuance of a **Green Bond** in late October 2024. Additionally, the funding for climate actions has been enhanced by **integrating CSR criteria into iliad's main syndicated loans**.

Green financing framework

The Green Financing Framework aims to further support transparency and accountability with regards to the group environmental impacts and sustainability strategy vis-à-vis investors, banks and other stakeholders.

This Framework is part of iliad's broader financial and operational approach to climate action. In 2021, the Group announced a €1 billion investment over 15 years to support the transformation of its networks, data centers, logistics and devices in line with its climate pledges. A portion of this long-term investment is expected to be aligned with the eligible project categories defined in the Green Financing Framework.

Furthermore, the Green Financing Framework which has been developed in accordance with the Green Bond Principles 2021, will be used to finance and/or refinance, in whole or in part, projects fulfilling the eligibility criteria for green investments. Eligible Green Projects may include capital expenditures ("CapEx"), research and development ("R&D") expenditures and other operational expenditures ("OpEx") related to the servicing, improvement and extension of Eligible Green Projects. It shall be noted that the Green Financing Framework of iliad was validated by Sustainalytics through a Second Party Opinion assuring its alignment with the ICMA Green Bond Principles 2021.

The use of CapEx, OpEx and R&D, as outlined in the Framework, will more precisely cover the following key areas:

- **Energy Efficiency – Networks**: e.g. projects related to the deployment of 5G;
- **Energy Efficiency – Data Centers**: e.g. projects related to data centers with a view to deploy latest technologies improving energy efficiency through cooling systems;
- **Energy Efficiency – Buildings Renovations**: e.g. projects related to insulation enhancement and replacement of window, external doors;
- **Circular Economy**: e.g. project related to refurbishment of products and components returned including Freebox, antenna and mobile phones;
- **Clean Transportation**: e.g. projects aimed at the development of software and AI solutions to optimize routes and thereby reduce number of km driven;
- **Renewable Energy**: e.g. projects related to on-site or off-site solar and wind renewable energy facilitating Power Purchase Agreements ("PPAs").

Moreover, this Green Financing Framework may be updated from time to time to ensure compliance with applicable regulation and continued alignment with voluntary market practices (including the ICMA's 2021 Green Bond Principles), or updates to iliad's sustainability strategy. For any material revision of the Framework, iliad will seek to obtain a refreshed Second Party Opinion ("SPO").

Green bond

In October 2024, iliad successfully issued its inaugural €500 million green bond. To ensure optimal allocation of its investments, the proceeds from this green bond issue will be used to finance, and in part refinance, eligible expenditure described in the Group's Green Financing Framework described above.

As part of our commitment to network transformation and renewable energy, in 2024, we are allocating approximatively €500 million in expenditure (CapEx + OpEx) following the Green Financing Framework (c. 7% of OpEx). This investment will drive the transformation and modernization of telecommunications networks, including high-speed fixed and mobile networks. It will enhance energy efficiency, support sustainable infrastructure development, and accelerate the transition towards a greener, more resilient digital future.

Integration of CSR criteria into syndicated loans

In 2024, iliad incorporated CSR criteria into its main syndicated loans, demonstrating its commitment to the successful implementation of its climate plan and promoting gender diversity within its workforce. The interest rates on a €2 billion revolving credit facility (RCF) and a €1 billion term loan signed in 2022 are now tied to CSR key performance indicators (KPIs), which include:

- reducing the Group's carbon footprint to meet its 2030 targets (Scopes 1, 2, and 3), as validated by the Science Based Targets initiative (SBTi) in early 2024;
- promoting gender diversity in the Group, with a focus on recruiting women among new employees.

Management of locked-in GHG emissions

As part of the actions taken to reduce its carbon footprint, iliad has identified several locked-in emissions. These are primarily related to network infrastructure, data centers and telecom systems, in particular:

- the use of fossil fuel required to run back-up generators, which are regularly tested to ensure they are in good working order with a marginal impact of 1% of total Scope 1 Emissions in 2024;
- the refrigerant gases of air conditioning systems accounting in 2024 for 18% of total Scope 1 Emissions (compared to 19% in 2023);
- the fleet of large commercial vehicles has also been identified as a locked-in emissions source as they are not easily replaceable yet by electric vehicles.

No stranded assets were identified during the analysis.

Disclosures pursuant the EU Taxonomy Regulation

Under European Regulation EU 2020/852, known as the "Taxonomy Regulation", which establishes a framework to facilitate and define sustainable investment within the European Union (EU), iliad must disclose KPIs for its full financial consolidation scope. These KPIs indicate the proportion of its net revenues (turnover), OpEx, and CapEx that are **Taxonomy-eligible and taxonomy aligned** towards 6 environmental objectives.

As it happens, the EU Taxonomy Regulation requires a two-step assessment of a company's activities.

First, it is necessary to identify which economic activities, based on **description provided in the delegated acts** (including NACE codes), are **taxonomy-eligible**, meaning they fall within the scope of the regulation and have the potential to contribute to six environmental objectives.

Second, to determine **taxonomy alignment**, an activity must satisfy the technical screening criteria for making a substantial contribution to at least one environmental objective, as defined in EU Delegated Regulations. Additionally, it must not cause significant harm to other environmental objectives ("DNSH") and must respect the minimum safeguards established by Taxonomy Regulation (EU), ensuring compliance with human and labor rights standards.

Since 2021, iliad has analyzed its activities against the first two climate objectives of the EU Taxonomy in line with the Climate Delegated Act:

- Climate Change Mitigation (CCM);
- Climate Change Adaptation (CCA).

In 2023, four new environmental objectives were added to the analysis:

- sustainable use and protection of water and marine resources;
- transition to a circular economy (CE);
- pollution prevention and control; and
- protection and restoration of biodiversity and ecosystems.

The iliad Group assessed the eligibility and the alignment of its activities and set its KPIs for 2024 on the basis of the new regulations related to the application of the Taxonomy Regulation:

- Commission Delegated Regulation (EU) 2021/2139 of June 4, 2021 (Climate Delegated Act);
- Commission Delegated Regulation (EU) 2021/2178 of July 6, 2021 (Disclosure Delegated Act);
- Commission Delegated Regulation (EU) 2022/1214 (Complementary Climate Delegated Act);
- Commission Delegated Regulations (EU) 2023/2485 amending the Climate Delegated Act;
- Commission Delegated Regulations (EU) 2023/2486 (Environmental Delegated Act) which establishes technical screening criteria for the four additional environmental objectives.

Assessment of taxonomy eligibility

Scope of Taxonomy-eligible economic activities

The Group's economic activities have been analyzed based on the Taxonomy Regulation and delegated acts.

As the telecoms sector still has very little representation among the eligible activities, the proportion of the Group's activities classified as eligible under the Taxonomy Regulation is low. However, iliad is committed to pursuing its policy of investing in the latest, most energy-efficient networks, as illustrated by its rollout of fiber and 5G and described in its Green Bond Framework available online.

The table below provides an overview of the Group's activities that have been evaluated for eligibility under the EU Taxonomy framework.

Economic activities	Description of the activity	Associated NACE code	Eligible Environ-nemental Objectives	Link to iliad's Business Model
Data processing, hosting and related activities (**Code 8.1** – Annex 1 Climate change mitigation and adaptation)	Storage, manipulation, management, movement, control, display, switching, interchange, transmission or processing of data through data centers, including edge computing.	J63.1.1	CCM	iliad's data centers, including its fiber and 5G infrastructure, enable efficient data storage, processing, and transmission, aligning with the objectives of change mitigation (CCM). Four Group companies (Scaleway S.A.S., OPCORE S.A.S.U., Free Pro S.A.S.U., 3S sp. z o.o.) perform an economic activity considered eligible for the climate change mitigation objective associated to this activity.
Repair, refurbishment and remanufacturing (**Code 5.1** – Annex 2 Transition to a circular economy)	Repair, refurbishment and remanufacturing of goods that have been used for their intended purpose before by a customer (physical person or legal person).	C26	CE	iliad's efforts to refurbish and remanufacture its telecom devices (e.g., Freebox, iliadboxes) and repair network equipment contribute to the circular economy (CE), promoting sustainability by extending product life cycles and reducing waste. Two companies, Freebox S.A.S. and Free Mobile S.A.S., carry out activities associated with this activity.
Sale of second-hand goods (**Code 5.4** – Annex 2 Transition to a circular economy)	Sale of second-hand goods that have been used for their intended purpose before by a customer (physical person or legal person), possibly after repair, refurbishment or remanufacturing.	C26	CE	iliad's offering of refurbished products, such as second-hand devices or equipment, supports the circular economy (CE) by reducing the need for new production and encouraging product reuse. Two companies, Freebox S.A.S. and Free Mobile S.A.S., carry out activities associated with this activity.
Product-as-a-service and other circular use- and result-oriented service models (**Code 5.5** – Annex 2 Transition to a circular economy)	Providing customers (physical person or legal person) with access to products through service models, which are either use-oriented services, pooled; or result-oriented, where the payment is pre-defined and the agreed result (i.e., pay per service unit) is delivered.	C26	CE	iliad offers service models where the product is leased or shared (e.g., mobile phones, routers), promoting a circular economy (CE) by reducing ownership-based consumption and encouraging product reuse and sharing. Two companies, Freebox S.A.S. and Free Mobile S.A.S., carry out activities associated with this activity.

Economic activities	Description of the activity	Associated NACE code	Eligible Environ-nemental Objectives	Link to iliad's Business Model
Cross-cutting activities outside of our core business				
Transportation by motorbikes, passenger cars, and light commercial vehicles (**Code 6,5** – Annex 1 Climate change mitigation)	Transport activities using motorbikes, passenger cars, and light commercial vehicles.	N77	CCM	iliad's logistics activities using vehicles contribute to its overall climate change mitigation (CCM) strategy, especially by incorporating energy-efficient and low-emission vehicle fleets.
Installation, maintenance and repair of charging stations for electrified vehicles in buildings (and parking spaces attached to buildings) (**Code 7.4** – Annex 1 Climate change mitigation)	This activity involves setting up charging stations for electrified vehicles at company premises, covering their installation, operation, and integration into the facility's infrastructure	N77	CCM	iliad's involvement in setting up and maintaining electric vehicle charging stations supports its climate change mitigation efforts and aligns with promoting green energy infrastructure.

It should be reminded that eligibility is based on the description of activities as provided in the Taxonomy Regulation and does not consider the substantial contribution, do no significant harm criteria and minimum social safeguard. OpEx and CapEx include "individually sustainable" eligible expenses relating to the Group's entire scope (e.g., expenses related to the purchase or leasing of electric vehicles) and not only to a scope confined to the three subsidiaries whose activities are eligible.

Assessment of Taxonomy alignment

Overview

The Group analyzed its six eligible activities, and the results showed that they are not Taxonomy-aligned.

To analyze taxonomy alignment, iliad went through the following steps for each economic activity identified as eligible under the Climate Delegated Act and Environmental Delegated act covering all six environmental objectives:

1. Technical Screening Criteria ("TSC"): assessment of whether the activity makes a substantial contribution to an environmental objective.
2. Do Not Significant Harm Criteria ("DNSH"): evaluation of whether the activity does no significant harm to the remaining environmental objectives.
3. Minimum Social Safeguards ("MS"): confirmation that procedures are in place, as described under the "Minimum Safeguards" section. Minimum safeguards assessment has been performed for all activities at once.

An activity is only considered Taxonomy-aligned if it meets all three conditions. Key findings from our assessment include:

- non-compliance with the substantial contribution related to the Circular Economy objective, due to the lack of a formal waste management plan and limited tracking of product lifespan or usage intensity;
- iliad's two crosscutting eligible activities are substantially contributing in terms of (i) Transportation by Motorbikes, Passenger Cars, and Light Commercial Vehicles, and (ii) Installation, Maintenance, and Repair of Charging Stations for Electric Vehicles;
- an overarching non-compliance to DNSH across the six eligible activities regarding the lack of climate change adaptation analysis;
- the minimum social safeguards are respected.

For detailed information, please see sections below.

Substantial contribution

The technical screening is performed on economic activities as described previously:

Data Processing, Hosting, and Related Activities (activity code 8.1): Given iliad's eligibility to substantially contribute to Climate Change Mitigation in relation to this activity, two main technical screening criteria apply:

- implement all relevant practices listed as "expected practices" in the most recent version of the European Code of Conduct on Data Centre Energy Efficiency (377), or in CEN-CENELEC document CLC TR50600-99-1:2021 "Data centre facilities and infrastructures – Part 99- Recommended practices for energy management";
- the implementation of those practices is verified by an independent third-party and audited at least every three years. The global warming potential (GWP) of refrigerants used in the data center cooling system does not exceed 675.

The technical screening criteria mentioned above are currently not fully met by our data centers.

Repair, Refurbishment, and Remanufacturing (activity code 5.1): to substantially contribute to this activity, two main criteria apply:

- the replaced parts, the refurbished products or the remanufactured products are covered by a sales contract where relevant;
- the economic activity implements a waste management plan that follows the waste hierarchy prioritizing reuse of materials. For remanufacturing, the waste management plan is publicly accessible.

As of now, iliad does not fully meet the criteria due to lack of public and formalized waste management plan. However, circular economy issues are in practice a priority for the Company, as outlined in ESRS E5.

Sale of Second-Hand Goods (activity code 5.4): The substantially contribution criteria state that:

- no restricted substances as per Directive 2011/65/EU, with exceptions for certain concentration levels;
- a waste management plan prioritizing reuse and recycling, including contracts with recycling partners;
- proper treatment at end of life, including preparation for reuse, recovery, or recycling in line with Directive 2012/19/EU.

As of now, iliad does not fully meet the criteria principally due to lack of formal waste management plan.

Product-as-a-Service and Other Circular Use- and Result-Oriented Service Models (activity code 5.5). The criteria for substantial contribution primarily include:

- ensuring product access while maintaining provider ownership, requiring customers to return items at the end of the contract. This extends product lifespan and increases usage efficiency;
- using packaging made of at least 65% recycled material (with certified raw materials and no plastic or metal coatings) or designing packaging for reuse within a system.

The iliad Group is not yet aligned with these criteria, as the Group has not conducted a full assessment to determine whether its activities effectively extend product lifespan or increase usage intensity in practice.

Transportation by Motorbikes, Passenger Cars, and Light Commercial Vehicles (activity code 6,5): The substantially contribution criteria are:

- for vehicles of category M1 and N1, specific emissions of CO_2, are lower than 50 gCO_2/km (low- and zero-emission light-duty vehicles) and from 2026 zero;
- for vehicles of category L, the tailpipe CO_2 emissions equal to 0 gCO_2e/km.

iliad is compliant with these criteria. Please see section "Actions for optimizing internal modes of transport" in E1 for more information regarding our initiatives.

Installation, maintenance and repair of charging stations for electric vehicles in buildings (activity code: 7.4): The sole criterion for substantial contribution under this activity is:

- installation, maintenance or repair of charging stations for electric vehicles.

The iliad Group meets this criterion. Please see section "Actions for optimizing internal modes of transport" in E1 for more information regarding our initiatives.

Do Not Significantly Harm

All taxonomy-eligible activities were individually assessed against the DNSH criteria outlined in below table. A common requirement across the six eligible activities is compliance with the **DNSH criteria for climate change adaptation**, requiring an analysis of potential physical risks through a **climate risk and vulnerability assessment**. iliad centrally manages climate risks, and a comprehensive assessment is ongoing in line with DNSH requirements (cf. E1 – Resilience Analysis in relation to climate change).

At this stage, iliad cannot yet confirm full compliance with the DNSH criteria, meaning that no eligible activity can currently be considered **aligned** under the EU Taxonomy.

The table below summarizes the various relevant DSNH criteria.

Minimum Safeguards

The final step in aligning with the Taxonomy involves meeting the requirements of the Minimum Safeguards (MS). These minimum safeguards include all procedures implemented to ensure that economic activities adhere to:

- the OECD Guidelines for Multinational Enterprises (OECD MNE Guidelines);
- the UN Guiding Principles on Business and Human Rights (UNGPs), including ILO conventions;
- the International Bill of Human Rights.

Given the lack of detailed guidance from the European Commission, our assessment follows the **Platform on Sustainable Finance's (PSF) Final Report (October 2022)** and covers four key areas as follows:

1. **Human Rights**: the iliad Group upholds International Labour Organization (ILO) Fundamental Conventions, respecting freedom of association and collective bargaining. The Group operates transparently, ensuring compliance with UNGPs and International Human Rights Law. The iliad Group has had no convictions for human rights violations and is not involved in any OECD National Contact Point or BHRRC cases.
2. **Corruption & Bribery**: the iliad Group enforces strict anti-corruption laws (Sapin II in France, Modello 231 in Italy, Polish Criminal Code) through:
   - an anti-corruption framework based on risk mapping;

- mandatory ethics training for all employees;
- third-party due diligence to assess corruption risks;
- a whistleblowing mechanism for ethical violations.

3. **Taxation**:

   The iliad Group undertakes to respect local tax laws and regulations that apply and pay its fair share of taxes in all countries where it operates, in line with the substance of the economic activity of the business locally. The Group considers that taxation is an integral part of its Corporate Social Responsibility: the dedicated tax team works with the Group's businesses to provide the required tax advice and guidance.

4. **Fair Competition**: The iliad Group adheres to antitrust regulations, reinforcing fair competition through:

   — antitrust & Competition Law Handbook,
   — employee training, including a 2024 session for senior management,
   — no competition law violations recorded in 2024 (see S2 & G1 for details).

This is supported by clear policies, training, and due diligence. Our **Anti-Corruption Code, Code of Ethics**, and **Partner Relations Charter** guide both employees and business partners, with **100% of contractors** committing to these principles. We also maintain a **whistleblowing system** and conduct **due diligence** on suppliers to ensure compliance.

We continuously monitor regulations and sanctions to mitigate risks and uphold ethical standards across our global operations.

For more information on our approach to the minimum social standards, please visit particularly the sections "ESRS S1 – Own workforce," "ESRS S2 – Workers in the value chain," "ESRS S4 – Consumers and end-users," and "ESRS G1 – Business conduct."

Taxonomy Indicators

Turnover

The proportion of the iliad Group's revenues related to eligible activities is determined by dividing the sum of revenues from eligible activities by the consolidated revenues (established pursuant to IFRS 15) presented in Section 5.3.1 Analysis of consolidated results.

The following activities are considered eligible under the taxonomy, with their corresponding eligibility indicators for turnover:

- data Processing, Hosting, and Related Activities (activity code 8.1): accounts for **2.1%** of turnover;
- sale of Second-Hand Goods (activity code 5.4): represents **0.2%** of turnover;
- product-as-a-Service and Other Circular Use- and Result-Oriented Service Models (activity code 5.5): account for an additional **3.4%** of turnover.

In summary:

- **2.1% of turnover** is eligible under the objective of contributing to **Climate Change Mitigation**;
- **3.6% of turnover** is eligible under the objective of contributing to the **Circular Economy**;
- **no eligible activities are taxonomy aligned**.

CapEx

The proportion of the iliad Group's capital expenditure related to eligible activities is determined by dividing the sum of capital expenditure from eligible activities and capital expenditure from individually eligible activities, as described in Section "Assessment of Taxonomy Eligibility", by the change ("Acquisitions") in capital expenditure stated in the Consolidated Financial Statements, section 6 in notes 17 (Intangible assets), 19 (Right-of-use assets) and 20 (Property, plant and equipment).

The capital expenditure (including right of use assets) in the Consolidated Financial Statements at December 31, 2024, totaled €3,397 million (€1,288 million from right-of-use assets, €1,895 million from acquisitions of property, plant and equipment, €214 million from acquisitions of intangible assets). Out of the €3,397 million of capital expenditures for 2024, €459 million amounted to eligible activities.

The following activities are considered eligible under the taxonomy, with their corresponding eligibility indicators for CapEx:

- data Processing, Hosting, and Related Activities (activity code 8.1): 9.6% of CapEx is eligible to this activity;
- repair, Refurbishment, and Remanufacturing (activity code 5.1): 3.0% of CapEx is eligible;
- installation, maintenance and repair of charging stations for electric vehicles in buildings (activity code: 7.4): **0.026%** of CapEx is eligible.

In summary:

- **9.6% of CapEx** is eligible under the objective of contributing to **Climate Change Mitigation;**
- **3.0% of CapEx** is eligible under the objective of contributing to **Circular Economy;**
- **no eligible activities are taxonomy aligned**.

OpEx

According to Delegated Regulation (EU) 2021/2178, the operating expenditure to be taken into account for the calculation of the taxonomy ratio corresponds to direct costs not capitalized, relating to:

(i) Research and development;

(ii) building renovation measures;

(iii) short-term lease;

(iv) maintenance and repair;

(v) any other direct expenditure relating to the day-to-day servicing of assets of property, plant and equipment by the undertaking or third party to whom activities are outsourced that are necessary to ensure the continued and effective functioning of such assets.

In accordance with the definition of OpEx in the EU taxonomy, the Group has not taken into account the energy expenses incurred to operate its Data centers.

The proportion of iliad's operating expenditure related to the Group's eligible activities is determined by dividing the sum of the Group's operating expenditure from eligible activities and operating expenditure from individually eligible activities, as described in Section "Assessment of Taxonomy Eligibility", by the sum of operating expenditure corresponding to the definition given previously.

The Group's total operating expenditure from the purchases used in production, payroll costs, external charges and other income and expenses from operations (net) line items amounted to €4,889 million for the fiscal year 2024. The OpEx expenditure defined according to the Delegated Regulation of July 6, 2021 amounted to €194 million, or 4.0% of the Group's total OpEx from the purchases used in production, payroll costs, external charges and other income and expenses from operations (net). The proportion of OpEx related to eligible activities amounted to 8.6% at December 31, 2024.

The following activities are considered eligible under the taxonomy, with their corresponding eligibility indicators for OpEx:

- transportation by Motorbikes, Passenger Cars, and Light Commercial Vehicles (activity code 6.5): **0.7%** of OpEx is eligible;
- data Processing, Hosting, and Related Activities (activity code 8.1): **7.8%** of OpEx is eligible to this activity.

In summary:

- **8.6% of OpEx** is eligible under the objective of contributing to **Climate Change Mitigation**;
- **no eligible activities are taxonomy aligned**.

- **Table 1 – Turnover**

Model: Proportion of turnover from products or services associated with Taxonomy-aligned economic activities – Information for 2024.

Substantial contribution criteria			Year	Substantial contribution criteria					
Economic activities	Code(s)	Turnover	Proportion of turnover – 2024	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity
		(€ millions)	*%*	*Y; N; N/EL*	*Y; N; N/EL*	*Y; N; N/EL*	*Y; N; N/EL*	*Y; N; N/EL*	*Y; N; N/EL*
A. Taxonomy-eligible activities									
A.1. Environmentally sustainable activities (Taxonomy-aligned)									
Turnover from environmentally sustainable activities (Taxonomy-aligned) (A.1)		**0**	**0%**	**0%**	**"-%"**	**"-%"**	**"-%"**	**"-%"**	**"-%"**
Of which enabling			0%						
Of which transitional			0%						
A.2 Taxonomy-eligible but not environmentally sustainable activities (non-Taxonomy-aligned)									
				EL; N/EL	*EL; N/EL*	*EL; N/EL*	*EL; N/EL*	*EL; N/EL*	*EL; N/EL*
Data processing, hosting and related activities	CCM 8.1	214.23	2.1%	EL	N/EL	N/EL	N/EL	N/EL	N/EL
Sale of second-hand goods	CE 5.4	15.25	0.2%	N/EL	N/EL	N/EL	N/EL	EL	N/EL
Product-as-a-service and other circular use- and result-oriented service models	CE 5.5	345.45	3.4%	N/EL	N/EL	N/EL	N/EL	EL	N/EL
Turnover from Taxonomy-eligible but not environmentally sustainable activities (non-Taxonomy-aligned) (A.2)		**574.93**	**5.7%**	**2.13%**	**"-%"**	**"-%"**	**"-%"**	**62.7%**	**"-%"**
Total turnover of Taxonomy-eligible activities (A.1 + A.2) (A)		**574.93**	**5.7%**	**2.13%**	**"-%"**	**"-%"**	**"-%"**	**62.7%**	**"-%"**
B. Non-Taxonomy-eligible activities									
Turnover from non-Taxonomy-eligible activities (B)		**9,449.07**	**94%**						
Total (A + B)		**10,024**	**100%**						

	Proportion of turnover/Total turnover	
	Taxonomy-aligned per objective	Taxonomy-eligible per objective
CCM	0%	2.1%
CCA	%	%
WTR	%	%
CE	%	3.6%
PPC	%	%
BIO	%	%

	Do No Significant Harm criteria ("DNSH")									
	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodi-versity	Minimum safeguards	Proportion of Taxonomy-aligned (A.1.) or eligible (A.2.) turnover – 2023	Category – enabling activity	Category – transitional activity
	Y/N	*Y/N*	*Y/N*	*Y/N*	*Y/N*	*Y/N*	*Y/N*	*%*	*E*	*T*
	"-%"	**"-%"**	**"-%"**	**"-%"**	**"-%"**	**"-%"**		**"-%"**		
								"-%"	E	
								"-%"		T
								1.4%		
								0.2%		
								1.3%		
								2.9%		
								2.9%		

- Table 2 – CapEx

Model: Proportion of CapEx related to products or services associated with Taxonomy-aligned economic activities – Information for 2024.

Substantial contribution criteria			Year	Substantial contribution criteria					
Economic activities	Code(s)	CapEx	Proportion of CapEx – 2024	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity
		(€ millions)	*%*	*Y; N; N/EL*	*Y; N; N/EL*	*Y; N; N/EL*	*Y; N; N/EL*	*Y; N; N/EL*	*Y; N; N/EL*
A. Taxonomy-eligible activities									
A.1. Environmentally sustainable activities (Taxonomy-aligned)									
CapEx related to environmentally sustainable activities (Taxonomy-aligned) (A.1)		**0**	**0%**	**0%**	**"-%"**	**"-%"**	**"-%"**	**"-%"**	**"-%"**
Of which enabling			0%	%	%	%	%	%	%
Of which transitional			0%						
A.2 Taxonomy-eligible but not environmentally sustainable activities (non-Taxonomy-aligned)									
				EL; N/EL	*EL; N/EL*	*EL; N/EL*	*EL; N/EL*	*EL; N/EL*	*EL; N/EL*
Data processing, hosting and related activities	CCM 8.1	326.318	9.6%	EL	N/EL	N/EL	N/EL	N/EL	N/EL
Repair, refurbishment and remanufacturing	CE 5.1	101	3.0%	N/EL	N/EL	N/EL	N/EL	EL	N/EL
Installation of charging stations for electrified vehicles at the company's premises	CCM 7.4	0.881	0.026%	EL	N/EL	N/EL	N/EL	N/EL	N/EL
CapEx related to Taxonomy-eligible but not environmentally sustainable activities (non-Taxonomy-aligned) (A.2)		**428.199**	**12.6%**	**76.4%**	**"-%"**	**"-%"**	**"-%"**	**23.6%**	**"-%"**
Total CapEx related to Taxonomy-eligible activities (A.1 + A.2) (A)		**428.199**	**12.6%**	**76.4%**	**"-%"**	**"-%"**	**"-%"**	**23.6%**	**"-%"**
B. Non-Taxonomy-eligible activities									
CapEx related to non-Taxonomy-eligible activities (B)		**2,968.801**	**87%**						
Total (A + B)		**3,397**	**100%**						

	Proportion of CapEx/Total CapEx	
	Taxonomy-aligned per objective	Taxonomy-eligible per objective
CCM	0%	9.6%
CCA	%	%
WTR	%	%
CE	%	3.0%
PPC	%	%
BIO	%	%

	Do No Significant Harm criteria ("DNSH")									
	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodi-versity	Minimum safeguards	Proportion of Taxonomy-aligned (A.1.) or eligible (A.2.) CapEx – 2023	Category – enabling activity	Category – transitional activity
	Y/N	*Y/N*	*Y/N*	*Y/N*	*Y/N*	*Y/N*	*Y/N*	*%*	*E*	*T*
	"-%"	**"-%"**	**"-%"**	**"-%"**	**"-%"**	**"-%"**		**"-%"**		
								"-%"	E	
								"-%"		T
								2.0%		
								3.5%		
								N.A		
								5.5%		
								5.5%		

- **Table 3 – OpEx**

Model: Proportion of OpEx related to products or services associated with Taxonomy-aligned economic activities – Information for 2024.

Substantial contribution criteria		Year		Substantial contribution criteria					
Economic activities	**Code(s)**	**OpEx**	**Proportion of OpEx – 2024**	**Climate change mitigation**	**Climate change adaptation**	**Water**	**Pollution**	**Circular economy**	**Biodiversity**
		(€ millions)	*%*	*Y; N; N/EL*	*Y; N; N/EL*	*Y; N; N/EL*	*Y; N; N/EL*	*Y; N; N/EL*	*Y; N; N/EL*
A. Taxonomy-eligible activities									
A.1. Environmentally sustainable activities (Taxonomy-aligned)									
OpEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		**0**	**0%**	**0%**	**"-%"**	**"-%"**	**"-%"**	**"-%"**	**"-%"**
Of which enabling			0%	%	%	%	%	%	%
Of which transitional			0%						
A.2 Taxonomy-eligible but not environmentally sustainable activities (non-Taxonomy-aligned)									
Text				*EL; N/EL*	*EL; N/EL*	*EL; N/EL*	*EL; N/EL*	*EL; N/EL*	*EL; N/EL*
Data processing, hosting and related activities	CCM 8.1	15.2	7.8%	EL	N/EL	N/EL	N/EL	N/EL	N/EL
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 7.4	1.4	0.7%	EL	N/EL	N/EL	N/EL	N/EL	N/EL
OpEx of Taxonomy-eligible but not environmentally sustainable activities (non-Taxonomy-aligned) (A.2)		**16.6**	**8.6%**	**100.0%**	**"-%"**	**"-%"**	**"-%"**	**"-%"**	**"-%"**
Total OpEx related to Taxonomy-eligible activities (A.1 + A.2) (A)		**16.6**	**8.6%**	**100.0%**	**"-%"**	**"-%"**	**"-%"**	**"-%"**	**"-%"**
B. Non-Taxonomy-eligible activities									
OpEx of non-Taxonomy-eligible activities (B)		**178**	**91.4%**						
Total (A + B)		**194**	**100%**						

	Proportion of OpEx/Total OpEx	
	Taxonomy-aligned per objective	**Taxonomy-eligible per objective**
CCM	0%	8.6%
CCA	%	%
WTR	%	%
CE	%	%
PPC	%	%
BIO	%	%

	Do No Significant Harm criteria ("DNSH")									
	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodi-versity	Minimum safeguards	Proportion of Taxonomy-aligned (A.1.) and Taxonomy-eligible (A.2.) OpEx – 2023	Category – enabling activity	Category – transitional activity
	Y/N	*Y/N*	*Y/N*	*Y/N*	*Y/N*	*Y/N*	*Y/N*	*%*	*E*	*T*
	"-%"	**"-%"**	**"-%"**	**"-%"**	**"-%"**	**"-%"**		**"-%"**		
		Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	"-%"	E	
	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	"-%"		T
								9.000%		
								9.000%		
								9.000%		

Template 1 – Nuclear and fossil gas related activities

	Nuclear energy related activities	
1.	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	NO
2.	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	NO
3.	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	NO
	Fossil gas related activities	
4.	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	NO
5.	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	NO
6.	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	NO

Integration of Transition Plan Elements into Business Strategy and Financial Planning

Beyond the EU taxonomy, iliad integrates key transition plan elements into its business strategy and financial planning to drive climate action.

Although the iliad Group has not yet finalized its transition plan for climate change mitigation, its key elements are integrated into its business strategy and financial planning. Materialization has started with the launch of its Climate Plan in December 2021, which includes a €1 billion investment over 15 years to support ambitious targets (please refer to sections "*Investments and Funding for Climate Actions*" and "*Background: our founding commitments*" above).

The alignment of iliad's business strategy with climate change mitigation initiatives is illustrated by the following examples:

- **engineering energy-efficient products and services** is a top priority. Significant efforts are being made, particularly with Freebox products, to ensure transparency and sustainability in their development;
- creating services that incorporate **embedded carbon footprint calculations** is becoming increasingly important for our clients, especially corporate customers. These solutions not only meet sustainability goals but also offer a competitive advantage in a carbon-conscious market;
- launch of **Green Financing Framework** which underscores iliad's commitment to its climate strategy launched in 2021 while also highlighting key projects that support the continuous improvement on environmental aspects.

Finally, the incorporation of climate actions into iliad's business strategy is backed up by a strong governance as outlined in ESRS 2. In particular:

- **Board CSR committee**: Sets sustainability strategy and ensures alignment with long-term goals. The climate strategy is reviewed every year from 2023;
- **Audit Committee**: Monitors financial integrity, internal controls, and sustainability-related disclosures;
- **Group CSR Committee**: Oversees environmental initiatives, integrating them into strategy and decision-making;
- **Compensation Committee**: Aligns executive compensation with sustainability goals;
- **General Management & Executive Committee**: Define sustainability policies, supervise program implementation, and ensure integration into business operations;
- **CSR Team**: Supports the sustainability roadmap, shares best practices, and monitors progress;
- **CSR Ambassadors**: Promote ESG initiatives and provide feedback to decision-making bodies.

As part of its ongoing efforts to reduce carbon emissions and decarbonize its energy supply, iliad, under the leadership of Xavier Niel, Chairman of the Board, has had its carbon reduction pathway validated by the SBTi. Additionally, the Group has signed in 2024 three new Power Purchase Agreements (PPAs) in its 3 geographies to further advance its climate goals.

Alignment with EU Paris-Aligned Benchmarks

The iliad Group is included in EU Paris-aligned Benchmarks. This means iliad's climate actions and strategies, as displayed in this report, are consistent with efforts to limit global warming to 1.5°C, as outlined in the Paris Agreement. Please see E1-3 and E1-4 for more information.

E1.SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model

Climate-related risks, both physical and transitional, affect various aspects of its operations and long-term resilience. This section outlines these risks and the Group's approach to assessing and mitigating their effects.

Environmental Considerations and Risk Assessment

The environment is one of the Group's major preoccupations. Environmental issues represent risks at every level of iliad's business throughout its value chain, from the choice of components in designing Freebox, to installing antennas for providing mobile coverage to subscribers. Although the probability of environmental risks and their potential severity are currently moderate, given the likely future impacts of climate change, their net criticality is considered high.

As displayed below, both physical and transition risks are recognized by the Group. At the end of 2024, the iliad Group launched a resilience analysis of its strategy and business model in relation to climate change, which is currently ongoing and will provide a thorough understanding of these risks and the resilience of the Group's activities. This report includes initial results of this analysis (cf. section "*Resilience Analysis in relation to climate change*"). Final conclusion will be published next year.

Climate-Related Risks: Physical and Transition Risks

A critical environmental risk related to climate change is **physical risk**. Extreme weather events such as storms, heat waves, fires, landslides, and floods can affect the smooth running of the group's networks, its operations and the people and organizations that depend on them.

The second major environmental risk is **transition risk**, particularly in relation to the energy transition. Energy related imperatives have a significant impact on the Group in terms of dependence, adaptation and cost, and the carbon strategy it needs to deploy. The Group has made commitments to reduce its carbon emissions and to transform its carbon pathway to bring it into line with the targets of the Paris Agreement. The Group is undertaking actions to limit the impact of its activities on the environment, especially by increasing energy efficiency and encouraging the creation of more renewable energy production capacity.

Impact, risk and opportunity management

E1.IRO-1 - Description of the processes to identify and assess material climate – related impacts, risks and opportunities

This section outlines iliad's approach to identifying and assessing climate-related IROs.

Identifying climate – related risks and opportunities

To identify and assess the material climate IROs, the group has relied on a DMA conducted in 2024 according to a methodology which is detailed in section ESRS 2. It should be highlighted that throughout all stages of the **DMA process**, multiple stakeholders were involved across all geographies and throughout the value chain, both internally and externally. For example, climate experts from providers specializing in hardware and energy, local authorities, bankers, representatives from telco associations, and public authorities were consulted.

Resilience analysis in relation to climate change

In 2024, the iliad Group initiated a resilience analysis to assess its strategy and business model against climate-related challenges. This analysis is ongoing and initial results below aims to provide a deeper understanding of the Group's resilience.

As part of its climate risk mapping, iliad is carrying out a detailed analysis of physical risks and transition risks and opportunities, in line with the requirements of the European Taxonomy and the CSRD. Based on appropriate climate scenarios and an in-depth study of its value chain, iliad is able to identify the main vulnerabilities of its activities, as well as the associated opportunities, in order to integrate these elements into proactive strategic planning.

Physical risks analysis

The iliad Group is currently conducting a physical risk assessment aiming to cover its own sites in France, Italy and Poland using their GPS coordinates. The exposure of these sites to climate hazards is currently being assessed using EcoAct's Climate Risk Platform specifically designed to assess physical climate risks. For each site, and in accordance with the nomenclature of the European taxonomy, the Platform provides an assessment of exposure to 28 climate hazards classified into 4 categories, with risks linked to: temperature (e.g. heat waves, heat stress), water (e.g. floods, droughts), wind (e.g. cyclones, storms) and solid masses (e.g. soil subsidence, coastal erosion). The EcoAct Climate Risk Platform, ECLR, thus provides exposure scores for each site and for each hazard, in the short (2030), medium (2050) and long (2100) term, and in accordance with the recommendations of ESRS2 IRO-1 20b, the exposure scores correspond to a climate scenario of high emissions (SSP5-8.5).

To assess the vulnerability scores of the sites, a classification of the sites by 'typology' (administrative site, data center, pylon, etc.) is established in order to assign each site a vulnerability score to each of the 28 climate hazards. Interviews were conducted with iliad teams to assess the level of criticality and adaptability of each type of site to the 28 climate hazards, resulting in a matrix giving a vulnerability score for each type of site and for each hazard. The associated impacts are assessed in terms of: physical damage to sites, variations in operating costs, business interruptions and the impact on employees.

The physical risk analysis work is still in progress, however, the initial results identify several material risks for iliad, which will be prioritized and examined in greater depth later on:

- **wildfires**: pose a direct threat to iliad's installations, the surrounding electricity network, or nearby employees via smoke, especially for network installations located outside urban areas, and in particular around the Mediterranean basin;
- **heat waves and heat stress**: increase the cooling needs of certain network installations, and deteriorate the working environment quality for employees or subcontractors;
- **floodings**: pose a direct threat to iliad's facilities and the surrounding electricity network, particularly those located on the banks of rivers or near low-lying coastlines;
- **droughts and water stress** : pose a direct threat to the electricity network near facilities, but also the production of semi-conductors, particularly in Taiwan, which are essential to the manufacture of the electronic equipment on which iliad depends;
- **violent winds**: pose a direct threat to iliad's installations and the surrounding electricity network, particularly those located near the Atlantic coast and in the plains;
- **clay soil subsidence** : pose a direct threat to iliad's facilities and the surrounding electricity network.

Transition risks and opportunities analysis

It is important to note that iliad's transition analysis goes beyond risk identification by incorporating opportunities as a preventive measure to mitigate risks and enhance resilience. While the IRO framework for E1 focuses on risks, iliad has chosen to consider transition opportunities, anticipating regulatory shifts, technological advancements, and market evolutions.

Selection of transition scenario

Starting from above, the analysis of transition risks and opportunities covers the full range of risks in a given scenario across iliad's entire value chain. At the same time, it identifies transition opportunities to provide a comprehensive view of market evolution for iliad.

The scenario chosen for the analysis of transition risks and opportunities was selected to ensure consistency with the long-term carbon neutrality objectives. In line with the recommendations of ESRS2 IRO-1 20c, iliad has opted for a Net Zero scenario in 2050 as the reference framework for assessing the risks and opportunities. This scenario serves as the basis for defining a coherent overall transition narrative, against which the transition risks and opportunities are assessed, taking into account projected developments in the political and legal, economic, social, technological and environmental spheres.

To establish this transition narrative, iliad relied on reference sources, in particular the "Net Zero" scenario of the NGFS (Network for Greening the Financial System), which provides global societal and macroeconomic projections at country level from a Net Zero transition perspective. The scenario S3 "Green Technologies" of the "Transition(s) 2050" study by ADEME (the French Environment and Energy Management Agency), and more specifically the "feuilleton numérique", was used to develop the projections for the digital and telecommunications sectors in France. Risks and opportunities were identified by analyzing operational activities and their dependence on the upstream and downstream value chains.

Assessing transitional risks and oportunities

Interviews were conducted with key iliad functions (risk, finance, network, procurement and CSR) to discuss each business line's perception of the environmental transition and its current and future impact on activities, and to identify the most material risks and opportunities in four main categories: regulatory, technological, market and reputational. Exposure to the risks and opportunities identified is analyzed in the light of the narrative and evolution of the key variables derived from the transition scenario. Vulnerability is defined in terms of the criticality of the risks to the value chain and the capacity to adaptassessed according to the measures in place or planned. The associated impacts are assessed from different angles: financial (CapEx, OpEx, revenues), human capital (skills, talent retention) and reputational. Gross and net risks and opportunities are assessed for the short (2027), medium (2030) and long (2050) term, enabling major risks and opportunities to be identified, as well as priority areas of work to be included in strategic planning.

Key findings from initial transition analysis

The transition risks and opportunities analysis work is still in progress; however, the initial results identify several material risks for iliad, which will be prioritized and examined in greater depth later on:

Regulatory risks: increased costs associated with the growing carbon price for suppliers and the regulatory compliance of iliad's network; difficulties in achieving environmental targets due to differences in environmental constraints with iliad's partners.

Technological risks: loss of market share through lack of technological adaptation; unsuccessful investments in new technologies.

Market risks: failure to meet climate targets due to growth in the telecoms market; difficulties in sourcing essential raw materials (semiconductors) or low-carbon materials needed to reduce the footprint; fluctuating energy prices.

Reputational risks: loss of public confidence in the IT and telecoms sectors; loss of confidence from iliad's investors in the absence of sufficient climate commitments.

Resource opportunities: cost reduction through energy efficiency, eco-design or re-use measures; reduction of carbon footprint thanks to the development of low-carbon materials and products; additional income from the use of batteries at network sites for the storage of renewable electricity.

Product and service opportunities: development of new digital adaptation services and the market for reconditioned and eco-designed terminals (e.g. smartphones).

Reputational opportunities: Strengthening investor confidence through strong climate objectives; strengthening and diversifying supplier partnerships, particularly around shared climate objectives.

The findings of the resilience analysis will inform strategic decision-making and further strengthen iliad's climate risk management approach.

E1-2 - Policies related to climate change mitigation and adaptation

To address the identified IROs and support its climate strategy, iliad has defined several policies and framework presented below. Further details on the implementation of these policies can be found in section E1-3 and E1-4.

Climate Change mitigation and energy efficiency policies

Framework for increasing the energy efficiency of fixed and mobile networks

The Group's activities related to Fixed and Mobile electronic communications require the deployment of energy-consuming infrastructure. To mitigate the associated negative impacts and risks—particularly those IROs related to emissions, energy consumption, and financial risks—the Group has made network energy efficiency a top priority in its Climate Pledge strategy since 2021. As part of this commitment, iliad is focused on supporting subscribers in transitioning to fiber and 5G, both of which are more energy-efficient than ADSL and 4G/3G. In addition, the Group has been investing in the latest generation of energy-efficient equipment for its networks for several years, further driving this transition.

Framework for optimizing energy use for data centers

Acknowledging our IRO related to the use of energy-intensive processes, particularly in our data centers, the Group has been committed, since signing the European Code of Conduct for Data Centers in 2012, to ensuring its data centers operate with high environmental performance (commitment no. 3 of our Climate Pledge). As a result, the teams at our hosting subsidiaries have been made aware of environmental issues and are dedicated to maximizing the energy efficiency of all our data centers.

Framework for minimizing the impact of products

Aware of the impact of its products, iliad knows that achieving its emission reduction targets must include implementing the principles of the circular economy. As such, these principles apply to Freebox to all aspects of its value chain: from design to transportation and recycling. Hence, all Freebox are designed according to the same principles, by exclusively selecting long-lasting technologies and materials for both the hardware and software components. For more information, please visit chapter E5 – circular economy.

In addition to the Group's efforts to explore all possible solutions for reducing the impact of its products on the environment, iliad also pays particular attention to reducing subscribers' electricity consumption by energy efficiency policy as described above.

Framework for optimizing modes of transport

Recognizing that the vehicle fleet contributes to climate change through GHG emissions, iliad's subsidiaries have adapted their vehicle policies since 2021, following the announcement of the Group's Climate Pledge strategy. As such, we are focusing on the following three solutions (1) renewing the vehicle fleet especially with electrical vehicles, (2) building charging stations and (3) optimizing travel for field service technicians.

In parallel, iliad has put in place remote working arrangements using digital solutions, especially video calls. These arrangements help both our employees, and our customers to lower their carbon footprint.

Framework for managing the environmental impacts of delivery logistics and supply chain

To minimize our GHG emissions throughout our value chain, environmental criteria are a key factor in the Group's partner selection process. As outlined in our Partner Relations Charter, we require our partners to comply with applicable environmental regulations and to minimize the environmental impact of their activities. For more information regarding our Partner Relations Charter, please visit G1.

To minimize emissions from delivery logistics, we prioritize the most environmentally friendly transport solutions. Our multimodal approach favors rail and river transport whenever possible, using trucks only for routes where rail is not an option and reserving air freight for exceptional cases, with the ambition to phase it out as outlined in our climate pledges. Our approach to Freebox deliveries focuses also on reducing home deliveries by prioritizing pick-up points. Through partnerships with specialized companies with strong national coverage, we ensure delivery and return points are located near subscribers, minimizing fragmented deliveries.

Climate Change Adaptation Policies

To address the climate-related physical and transitional risks identified in the double materiality analysis, iliad is developing climate change adaptation policies, which will be further enhanced in the coming year. At the end of 2024, the iliad Group began a resilience analysis with help from EcoAct which aims to provide a deeper understanding of risks and strengthen the resilience of the Group's operations. Meanwhile, operational strategies to address both physical and transition climate risks are already in place as outlined below.

Physical risks framework

To mitigate the impact of extreme weather events on people, networks, operations, and organizations, iliad has established a coordinated response framework designed to minimize disruptions and ensure rapid service restoration. This includes mobilizing resources, repairing damaged infrastructure, and continuously assessing network resilience to enhance long-term preparedness.

Transition risks framework

To mitigate transitional risks related to reputational and regulatory impacts due to our carbon footprint, our framework integrates energy efficiency principles into product design, network operations, and infrastructure planning. Governance mechanisms oversee carbon reduction strategies, ensuring continuous adaptation to evolving environmental standards.

To enhance **energy resilience**, the Group's policy of sourcing 100% of its direct electricity from renewable sources, aligns with its Climate Pledge strategy from 2021.

iliad's procurement framework includes long-term renewable energy contracts and Power Purchase Agreements (PPAs) which not only ensure cost stability and mitigate financial exposure but also support the development of renewable energy infrastructure thanks to ambitious criteria:

- engaging with local electricity production units, located as close as possible to the points of consumption in France, Italy and Poland;
- supporting in priority, recent equipment brought into service after 2015;
- using solar and wind power, enabling us to contribute to energy transition;
- relying on the international not-for-profit energy ecolabel, EKOenergy, to minimize impact on biodiversity and take part in new green energy projects worldwide.

The energy generated under our PPAs, both currently and in the future, covers part of our direct electricity use, with the remaining part covered by Guarantees of Origin (GOs). These GOs provide transparency and traceability, ensuring compliance with European standards while strengthening regulatory compliance and minimizing reputational risks linked to the Group's carbon footprint.

E1-3 - Actions and resources in relation to climate change policies

Climate Change mitigation and energy efficiency actions

Actions for reducing the energy consumption of mobile networks

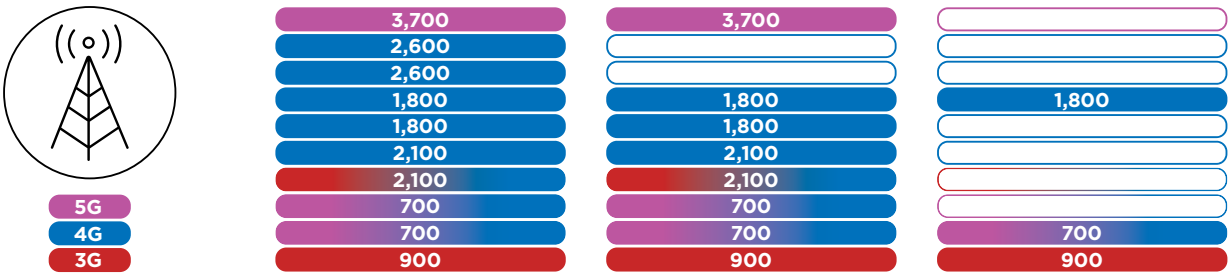
In line with its objective of making its fixed and mobile networks more energy efficient, the Goup is on the lookout for the least power-intensive equipment.

In France, Free Mobile uses **new generation radioelectric equipment** for its network, which is significantly less energy-intensive than the previous generations. This enables the group to keep the increase in our mobile network's energy consumption at contained levels, despite the strong growth in its mobile business. As iliad continues to expand its 5G rollout, this technology will play a key role in optimizing energy efficiency while accommodating rising usage over time.

The Group is aware that, even if it is renewable, the best type of energy is energy that's not used at all. As a result, several frequencies have been put on standby at night in order to reduce the energy consumption of Free's mobile network in France. This helps reduce a site's electricity consumption by more than 10% during the period when the cells are switched off, without impacting usage or quality of service (for sites where all frequencies are available during the day). If the volume of traffic requires it, the cells automatically come back on to maintain optimal quality of service.

Furthermore, two major initiatives are expected in 2025:

1. Extending the automatic shutdown and startup feature during daytime hours for the 2,600 MHz frequency on a portion of the (low-density) network. This extension is expected to generate energy savings of around 7-8% per site and will cover approximately 5,000 to 6,000 sites.
2. Introducing new equipment could consume up to 30% less energy.



A mobile site with all active frequency bands

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

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

The Group is also reducing the number of simultaneous transmitters in the same frequency band (MIMO reduction) for those that remain operational at night, which allows to cut the amplifiers on the bands in question.

It shall be noted that similar initiatives are underway in Italy and Poland. As an example, in Poland:

- the use of algorithms that continuously analyze the amount of data being transmitted and turn off amplifiers when no data is being transmitted,
- from 2023, the use of artificial intelligence to reduce resources and data streams, adapting the amount of data to user demand and reducing it during periods of low network load during all day,
- the usage of advanced devices capable of entering a deep mode state that minimizes energy consumption.

Looking ahead to 2025, Play is committed to further enhancing energy efficiency. Key initiatives include the implementation of intelligent transmit power selection to improve quality and reduce power consumed. Additionally, Play actively participate in the process of testing and creating new energy-saving solutions provided by our suppliers, as well as working on our own solutions, using Machine Learning and Artificial Intelligence mechanisms.

Actions for reducing the energy consumption of fixed networks

For its fixed networks, the Group is **pursuing, and further accelerating, it rollouts of optical fiber**- a particularly energy-efficient technology – and encouraging our subscribers to switch to fiber. In 2024, the group deployed 7.6 million new connectible fiber sockets compared with 5.8 million in 2022 and 4 million in 2023. In France, the Group systematically encourages all eligible subscribers to switch to fiber, at no extra cost, and at end-2024, 82% of our subscriber base was fiber-connected (versus 74% at end-2023).

At the same time, the Group is calling for the copper network to be shut down more quickly than currently planned and are recommending a gradual technical shutdown in the very near term. An FTTH line uses almost four times less power than an ADSL line (0.5 watts vs. 1.8 watts per line), which is why the Group takes a proactive stance on this, and we have the highest fiber take-up rate of all of France's telcos. iliad is also working to optimize the equipment in place as the ADSL networks are decommissioned, notably by disconnecting and miniaturizing DSLAMs. In Poland, the focus is on upgrading the HFC network to FTTH and deploying the FTTH network on greenfield sites In Italy, iliad has chosen to propose only FTTH connections since launching its offering.

Actions for optimizing energy use for data centers

To meet its data centers' ambitious Power Usage Effectiveness (PUE) targets, the Group is taking measures to continuously improving cooling systems (e.g., natural cooling using outside air) and upgrading infrastructure by using highly energy-efficient equipment.

As an example, in Saint-Ouen l'Aumône, located outside Paris, the iliad Group has developed a data center model that is particularly efficient in terms of electricity and water usage. This data center incorporates evaporative and air cooling into a single system using the evaporation of a small quantity of water to lower the temperature inside the server room when outside air temperatures are high (adiabatic cooling system). Combined with the use of outside air to cool the servers, the system avoids the need for air conditioning which means the **data center consumes 30% to 40% less** electricity compared with a traditional data center and uses **9 to 10 times less water** than systems with open cooling towers. For more information regarding our water management approach, please visit E3 – Water and Marine Resources.

The Group has also obtained several certifications for its data centers. Scaleway sites are ISO 50001 certified for energy management representing 36% of all data centers, while two data centers in Amsterdam are ISO 14001 certified for environmental management. The measures adopted to achieve energy efficiency and minimize energy loss have made our data centers highly innovative structures in terms of electricity consumption. The technologies used are detailed in an internal specifications document entitled ECS 2.0.

In addition to these certifications, iliad pledges as part of its Climate Strategy to demonstrate transparency to its stakeholders and therefore publish energy indicators for its data centers in open data format on the Scaleway website.

In 2024, Scaleway launched an environmental calculator enabling customers to track the full impact of their cloud usage, covering energy consumption, water usage, product lifecycle emissions, and all three emission scopes. This tool is aligned with the ADEME's Product Category Rules (PCR) methodology, ensuring transparency and standardization in environmental footprint calculation.

It provides both real-time impact estimations depending on the service's usage and detailed monthly reports, empowering businesses to optimize their infrastructure. By making environmental impact metrics accessible and actionable, Scaleway supports companies to integrate sustainability into their IT decisions.

Name of data center in France operated by the Group	Certifications
DC1 Paris	ISO/IEC 27001 (Information Security Management Systems) HDS (Health Data Hosting) APSAD (Assemblée Plénière de Sociétés d'Assurances Dommages) Code of Conduct
DC2 FR-PAR-1 Paris	ISO/IEC 27001 (Information Security Management Systems) HDS 1 (Health Data Hosting) ISO 50001 (Energy management) APSAD (Assemblée Plénière de Sociétés d'Assurances Dommages) Code of Conduct
DC3 Paris	ISO/IEC 27001 (Information Security Management Systems) HDS (Health Data Hosting) ISO 50001 (Energy management) APSAD (Assemblée Plénière de Sociétés d'Assurances Dommages) Code of Conduct Uptime Institute Tier III
DC4 FR-PAR-3 Paris	ISO/IEC 27001 (Information Security Management Systems) HDS (Health Data Hosting) ISO 50001 (Energy management) APSAD (Assemblée Plénière de Sociétés d'Assurances Dommages) Code of Conduct
DC5 FR-PAR-2 Paris	ISO/IEC 27001 (Information Security Management Systems) HDS (Health Data Hosting) ISO 50001 (Energy management) APSAD (Assemblée Plénière de Sociétés d'Assurances Dommages) Code of Conduct
MRS01 Marseille	ISO/IEC 27001 (Information Security Management Systems) HDS (Health Data Hosting) PCI DSS (Payment Card Industry Data Security Standard)
LYO02 Lyon	ISO/IEC 27001 (Information Security Management Systems) HDS (Health Data Hosting)
LYO03 Lyon	ISO/IEC 27001 (Information Security Management Systems) HDS (Health Data Hosting)

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

Actions for minimizing the impact of products & services

Minimizing the environmental impact of its products is a crucial lever in iliad's decarbonization strategy. Central to this approach is eco-design, where iliad focuses on developing products with a lower environmental footprint throughout their lifecycle—from production and use to end-of-life disposal.

Since the Freebox is designed, engineered and managed entirely in-house, the group has many levers for action to reduce its carbon footprint. Several actions have been undertaken to reduce the GHG emissions related to the Freebox manufacturing:

- making the products more compact and reducing the quantity of raw materials used in their production & in the packaging;
- promoting the use of recycled materials as much as possible;
- applying a modular design approach, enabling certain electronic components to be changed;
- choosing easily repairable materials and suitable assembly techniques, enabling most of the components to be repaired and restored;
- encouraging and optimizing the recycling of Freebox.

A more exhaustive view of how the group is leveraging circular economy to minimize its products' impact is available in section E5.

The Group also pays particular attention to reducing subscribers' electricity consumption from the use of its products to minimize its indirect environmental impact and lower subscribers' energy bills. Indeed, consumption devices at our subscribers' premises is an indirect use of energy and it significantly affects our Scope 3 emission, as well as GHG emissions impact of Freebox's production.

In line with the Group's climate commitments, environmental criteria have become a key factor in the supplier selection process. The iliad Group actively collaborates with electronic component manufacturers to minimize the energy consumption of its Freebox by selecting the most energy-efficient components available. However, due to the industry's high level of concentration, we are significantly reliant on certain providers for specific solutions, which may affect our ability to achieve sustainability goals.

As the Freebox is entirely designed in-house, iliad teams have full control over its software, enabling them to develop optimized features that promote energy savings. These include total sleep mode and tailored applications that encourage subscribers to activate it, with the added flexibility of deactivating it remotely when needed.

Additionally, Life Cycle Analysis (LCA) are systematically conducted according to a protocol based on the main principles of ISO 14040, using the EIME tool developed by Bureau Veritas, which creates an eco-passport by product in line with the approach adopted by the European Commission in 2013. This approach provides a detailed and accurate assessment of the environmental footprint of each Freebox generation, supporting continuous improvements in the eco-design of future models.

Actions for managing the environmental impacts of delivery logistics and supply chain

To optimize loads, iliad packs more items into containers and trucks, and standardizes pallet formats to improve the surface area/energy ratio. The Group also strives to eliminate empty runs, with only full trucks being sent on the roads and doing round-trips between manufacturing and logistics sites. Additionally, for several years now, iliad has been using reusable plastic shipping pallets which increase the truck fill rate by about 30% and at the same time reduces waste by minimizing the use of wooden pallets and cardboard packaging.

Despite longer timeframes and more complex tracking processes, sea freight is the Group's standard mode of transport for its Freebox as it is less GHG-emissive[(1)] than other means of transport. Freebox teams have therefore developed highly efficient systems for anticipating order level. For overland and inter-site transport requirements, Freebox is a pioneer in its industry as it uses rail for part of the freight journey, which is less carbon-intensive than road transport.

The Group is also pursuing its efforts to reduce the number of deliveries to subscribers' homes and to encourage the use of pick-up points. Partnerships have been developed with specialized companies that have very good national coverage to ensure that Freebox delivery and return points are located near subscribers' homes. The Free Centers network also has good nationwide coverage, with 255 stores across France at end-2024 (225 in 2023), offering another effective way of pooling shipments of Freebox and accessories.

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

In Poland the main mode of transport for purchased boxes is by sea, accounting for 93%. Main distribution warehouse in Poland is located just 7,2km from the air cargo terminal and 3,2km from main expressway communication hub. This strategic location helps optimize logistics by reducing distances and improving accessibility. Transportation is streamlined in both directions - outbound and inbound - to stores, dealers, installers, and repair or refurbish partners, using package aggregation, direct routes, and full truck roundtrips.

To reduce carbon emissions, Play has introduced a dedicated waste recycling process directly from points of waste generated across the country. Play uses a flexible delivery method to and from subscribers, emphasizing the use of lockers, with over 25,000 parcel locker machines in Poland (InPost).

Actions for optimizing internal modes of transport

It should be noted that since 2023, company cars are being allocated after analyzing employee's usage to determine type of cars needed. A decision-making matrix, created jointly by the Purchasing, Fleet Management and Environmental Departments helps to attribute Electric Vehicles.

With respect to **optimizing travel for field service technicians** a specific IT system has been put in place for scheduling the appointments and journeys of field service technicians to help reduce energy use and CO_2eq emissions. This system's features include automatic route calculation and arranging the order of technicians' appointments to minimize the distances between them. In 2023, the group entered a new contract for its vehicle fleet, enabling it to begin equipping service vehicles with telematic trackers. Thanks to these trackers, iliad can further optimize vehicle's assignment.

Furthermore, the objective of the Group's new subscriber support arm – Free Proxi – is to provide a local service, which means that employees work closer to their homes and must travel shorter distances when called out to subscribers. This makes it easier to use alternative means of transport other than the car, and we encourage all our teams in cities to use public transportation.

When it comes to the **renewing the vehicle fleet**, the group selects vehicles with engines that emit fewer fine particulates (NO_x) and greenhouse gases in accordance with the applicable regulations, when vehicles in the fleet are replaced. New electric vehicles are also gradually added to the fleet as presented in the Metrics and Target section below.

The development of EV (Electric Vehicle) infrastructure is essential to supporting the transition to sustainable mobility.

To facilitate this shift, the Group is investing in the installation of EV charging stations at key locations and providing charging solutions for employees at their homes which has resulted in:

- 80 charging points in operation across 10 of our sites;
- 66 charging points installed at employees' homes, with 100+ more to be deployed in the coming months.

(1) Source: ADEME's *Base Empreinte*© database, at December 31, 2023.

As for **charging stations**, the Group launched a call for tenders seeking a company to equip its sites with EV charging stations over the following three years, to encourage its employees to choose more ecological and sustainable means of transport. The service provider selected – Qovoltis – specializes in smart charging stations for electric vehicles, enabling charging costs to be optimized and efficiently managed. Qovoltis charging stations are compatible with the V2G (Vehicle-to-grid)[1] and Plug&Charge[2] standards and are technological leaders in their domain. Meanwhile, in Poland, Elocity has become the company responsible for building the infrastructure for charging electric cars. At the end of the year, there were twelve charging points in Poland (including one powered by solar panels).

Climate change adaptation actions

Actions addressing physical risks

Extreme weather events (such as storms, heat waves, fires, landslides, and floods) can affect the smooth running of our networks, our operations and the people as well as organizations that depend on them. Through a coordinated response mechanism, iliad is capable of mobilizing resources to minimize disruptions and quickly restore network service. After each event, the resilience of our infrastructure and operations is assessed, with a view to continuously improving our systems. The robustness of our networks and the responsiveness of our teams were clearly demonstrated following the severe storms that swept across France in 2023 and the widespread flooding in the southern regions of Poland in 2024.

For details on our efforts to adapt data centers to heatwaves, please refer to *Climatic Adaptation in Data Centers* in E3. This section outlines how OPCORE's data centers are designed to withstand heatwaves while managing reasonable water consumption and maintaining energy efficiency, thereby indirectly mitigating future water stress.

Actions addressing transition risks

Energy related imperatives have a significant impact on the Group in terms of dependence, adaptation cost, and in terms of carbon strategy it needs to deploy.

To strengthen energy resilience and reduce exposure to energy price fluctuations due to climate change, we have taken steps to encourage the creation of **renewable energy production capacity**. In February 2023, the Group signed its first Power Purchase Agreement (PPA) in France with Engie, under which iliad commits to purchasing electricity from a solar farm for 15 years. Production is estimated at more than 20 GWh per year. In early 2024, we announced that we are signing PPAs in France, Italy and Poland, for total installed energy capacity of 89.5 MW.

Through these agreements, we secure long-term energy prices—ranging from 10 to 15 years—ensuring stability and sustainability. The energy generated under our PPAs, both now and in the future, is EKOenergy certified under strict sustainability criteria, and covers part of our direct electricity use, with the remaining part covered by guarantees of origin (GO).

Complying with environmental regulations and keeping our environmental pledges are of primordial importance to the Group. Failure to comply with such regulations and/or meet these pledges could not only have an adverse legal impact, but could also affect our ability to attract investors, as banks and financial specialists closely analyze our environmental commitments and compliance with the applicable standards, through the ratings given by ESG rating agencies. Our ability to secure financing and our borrowing costs will depend on our level of sustainability maturity.

Metrics and targets

E1-4 - Targets related to climate change mitigation and adaptation

To track the effectiveness and achievements of policies and actions undertaken linked to the identified impacts and risks, iliad has set targets and is monitoring several key intermediary metrics in addition to GHG emissions.

Intermediary specific Indicators

Tracking energy efficiency of fixed and mobile networks

In line with its policy to encourage its subscribers to switch to fiber, the group is monitoring the deployment of new connectible fiber sockets (7.6 million in 2024, 4.0 million in 2023 and 5.8 million in 2022) as well as the percentage of its fiber-connected subscriber base (in France: 82% at end-2024, versus 74% at end-2023, versus 65% at end-2022).

Tracking the environmental impacts of delivery logistics and supply chain

In 2024, transport levels returned to normal, down 14% compared to the levels of 2023. The volume of the Group's transported products increased by 28%, marking a return to typical levels after a 26% drop in 2022 caused by the external operating challenges related to the semiconductor crisis.

As part of the supply chain mix, the share of air freight has returned to nearly 0%, down from 7% in 2023. This spike was a result of the semiconductor crisis, putting significant pressure on inventory levels for boxes and accessories, requiring rapid replenishment to meet demand. The Group remains committed to minimizing air freight usage and keeping it well below 10% of total freight volumes.

(1) Vehicle-to-Grid: (ISO 15118-20) is smart charging technology that allows EV batteries to give their unused battery capacity back to the grid to provide support to the grid during times of peak demand. This means that parked vehicles become energy storage units and micro-distributors of electricity.
(2) Plug&Charge: (ISO 15118-20) is an encrypted process whereby rather than relying on an external form of authentication, the charging station securely authenticates the vehicle itself as soon as it connects to the charging station.

- **Breakdown of modes of transportation from Asia to France for Freebox SAS**

	2022		2023		2024	
	Tonnes	Mix %	Tonnes	Mix %	Tonnes	Mix %
Air	902	31%	248	7%	9	0.3%
Sea	1,907	66%	3,246	88%	1,720	54%
Rail	73	3%	203	5%	1,433	45%
Road	0	0%	0	0%	0	0%
Total	**2,881**	**100%**	**3,696**	**100%**	**3,162**	**100%**

Tracking energy use for data centers

The Group has set itself **a PUE (Power Usage Effectiveness) target of less than 1.15 for all new data centers built after 2018, and less than 1.3 for data centers built prior to that year**. Our current PUE targets represent an average incremental efficiency gain of up to 30% over the weighted industry average of 1.56 (see below). 2014 performance is slightly above the targets as some of the data centers are not operating at full scale yet.

The Group is also **pledging to cut up to 7.05 MW of its data centers' instantaneous electricity consumption** in winter if France suffers energy shortages. The plan is to do this for consecutive periods of 1 to 24 hours whenever necessary if the national electricity grid comes under stress.

Data center indicators	2022	2023	2024
Average PUE for iliad	1.37	1.35	1.35
Average PUE for Datacenters built after 2018	ND	ND	1.21
Average PUE for Datacenters built before 2018	ND	ND	1.41
Average PUE published by the Uptime Institute	1.55	1.58	1.56

Similarly, for CO_2eq emissions, the Group selected two KPIs to track mobile network emissions. The first indicator used is the amount of CO_2eq emitted by the mobile network per gigabyte of mobile data consumed. The second indicator is the CO_2eq emitted by its subscribers (without distinction between fixed and mobile) by dividing the Scope 1 and Scope 2 Market-Based Emissions excluding Data Center Emissions by the average number of fixed and mobile subscribers in the reporting year.

	2022[(a)]	2023[(a)]	2024[(a)]
Carbon intensity of a GB consumed on the mobile network *(Group, in gCO_2eq/GB)*	36.8	36.3	36.6
Carbon intensity of a GB consumed on the mobile network *(France, in gCO_2eq/GB)*	8.6	6.6	7.4
Carbon intensity of a GB consumed on the mobile network *(Italy, in gCO_2eq/GB)*	44.6	48.1	46.0
Carbon intensity of a GB consumed on the mobile network *(Poland, in gCO_2eq/GB)*	60.4	57.2	57.2
Carbon intensity of a fixed-line or mobile subscriber *(Group, in kCO_2eq)*	4.7	4.8	5.4
Carbon intensity of a fixed-line or mobile subscriber *(France, in kCO_2eq)*	1.6	1.5	1.5
Carbon intensity of a fixed-line or mobile subscriber *(Italy, in kCO_2eq)*	8.8	8.2	10.9
Carbon intensity of a fixed-line or mobile subscriber *(Poland, in kCO_2eq)*	6.5	7.2	6.9

(a) Including UPC since 2021.

Tracking the impact of products

A detailed overview of how the Group monitors circular economy practices to minimize product impact can be found in section E5. For example, we track key performance indicators (KPIs) related to waste recovery and recycling, particularly concerning our Freebox.

Tracking the modes of transport

iliad's vehicle fleet represents the main lever for reducing its Scope 1 emissions. To meet its climate pledges, the Group is aiming to reduce the emissions generated by the fleet Group-wide. In this context, iliad's climate plan includes a commitment to ensure that electric vehicles will represent 25% of the Group's fleet by 2025.

The first step to achieving this objective was to limit increases in the size of the fleet as far as possible in all three of our geographies.

As a result, despite the business growth in Europe, the number of vehicles in the fleet remained stable in 2024, and at the year-end we had a total of 5,786 vehicles including 301 electric cars (vs 220 cars in 2023) across the Group as a whole. iliad intends to continue this optimization strategy in 2025, particularly when renewing its fleet.

In France, iliad recently replaced a portion of the fleet, selecting vehicles with engines that emit fewer fine particles (NO_x). It is also adding more electric vehicles to the fleet totalizing 294 EVs in France at end-2024 (representing 7% of the total fleet for France vs 5% in 2023 and 3% in 2020).

In Poland, Play has begun to switch to a greener vehicle fleet doubling its total number of hybrid vehicles for a total of 651 vehicles representing 64% of the total fleet (vs. 341 at end-2023. Moreover, a pilot program to electrify the fleet has been launched by Play and 20 electric cars have been ordered.

For emissions generated by non-electric vehicles, a cap of 140g CO_2eq/km has been set.

- **Average vehicle emissions**

	2022	2023	2024
Number of vehicles	5,914	5,855	5 786
o/w electric vehicles	*222*	*220*	*301*
France	4,706	4,504	4 441
Poland	884	1,021	1 012
Italy	324	330	333
Average annual emissions of kilograms of CO_2eq per vehicle	3,171	3,277	3,241

Tracking actions to mitigate physical risks

Following an ongoing resilience analysis conducted with EcoAct, actions to address physical risks are expected to be closely monitored and tracked in 2025.

Tracking actions to mitigate transition risks

To strengthen energy resilience and reduce emissions and exposure to energy price fluctuations due to climate change, we have taken steps to encourage the development of new renewable energy production capacity.

The Group's objective is to source at least 50% of our electricity through PPAs by 2035 in Italy and Poland, where the electricity mix is more carbon-intensive than in France. In France, where the energy mix is already low in carbon, iliad is aiming for 20% of its electricity to be covered by PPAs by 2035.

As part of our broader strategy to mitigate transition risks, we have worked to engage our suppliers in reducing their energy consumption and carbon emissions. Through our EcoVadis sustainability assessments, we track and support supplier progress on environmental criteria. The following progress reflects the latest new indicators for supplier action plans related to energy and emissions reductions.

	2022	2023	2024
% of assessed suppliers that have set up action plans to reduce their energy consumption and carbon emissions	ND	87%	87.2%
% of assessed suppliers that have set up action plans related to the Science Based Targets initiative	ND	21.7%	29.7%

Since 2021, 87% of assessed suppliers have established action plans to reduce energy consumption and emissions. Additionally, 29.7% of assessed suppliers have aligned their trajectories with Science-Based Targets, an increase from 21.7% in 2023. These new indicators reflect our ongoing commitment to sustainable practices across both our operations and supply chain.

GHG emission overall reduction targets

The iliad Group is committed to reducing its greenhouse gas (GHG) emissions across Scope 1, 2, and 3 in line with the Science-Based Targets initiative (SBTi) and Net-Zero Standard. With targets set for 2030 and Net-Zero by 2050, iliad aims to achieve significant emissions reductions, ensuring transparency and measurable progress for stakeholders.

Carbon emission calculation and methodology

The entire value chain, upstream and downstream, is included in the calculation of carbon emissions, in accordance with the GHG Protocol methodology required for drafting a carbon transition pathway in line with SBTi principles. In February 2024, the SBTi approved iliad's short-term and Net-Zero Standard carbon emissions reduction targets. As these targets were set in 2023, iliad has chosen 2022 as the baseline year to ensure transparent and verifiable presentation of progress, enhancing comparability for stakeholders and regulatory entities. The figures reported for 2022 have been restated to include the Zefiro joint venture and the targets recalculated accordingly.

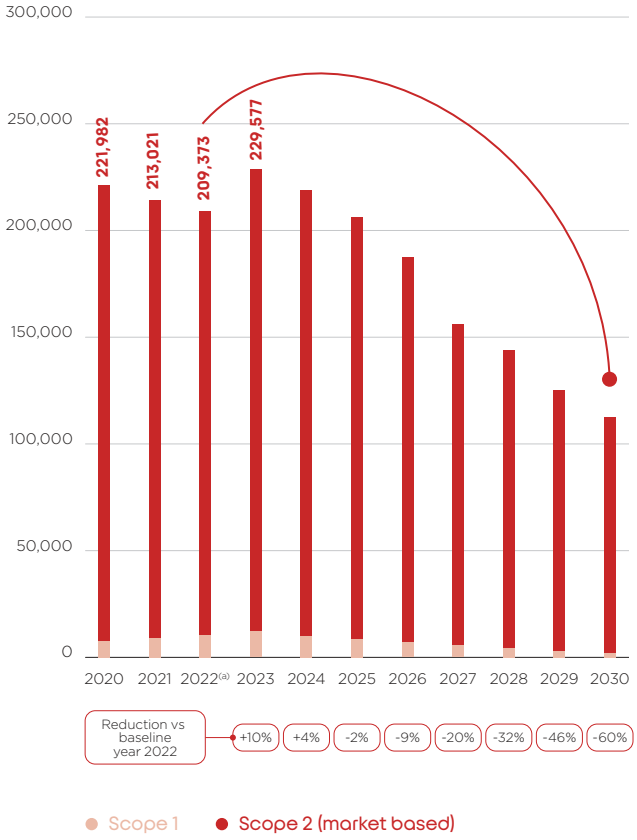
The Greenhouse Gas (GHG) Protocol contains two methods of accounting for carbon emissions:

- the location-based method calculates emissions based on the average emissions intensity of the local grids on which electricity consumption occurs. According to this method, the Group's electricity use is more carbon-emitting in Poland than in France, for example;
- the market-based method measures emissions based on the electricity that organizations have chosen to purchase. For instance, the iliad Group purchases renewable electricity with guarantees of origin for the electricity it uses directly.

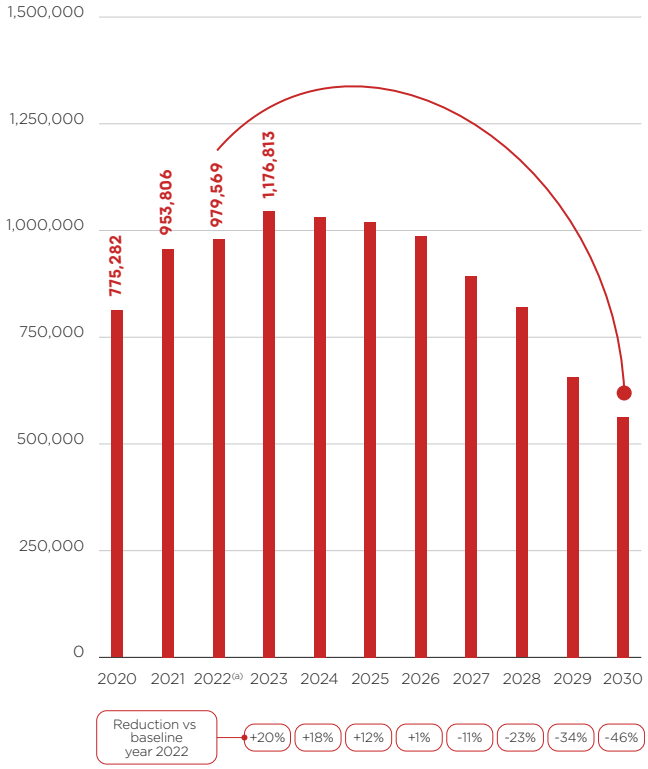
The group has chosen to set "market-based" targets as this is the area in which it is most likely to have an impact.

Carbon emission targets by scope

GHG emissions scope 1 & 2



GHG emissions scope 3



(a) Including 12 months of Zefiro (please see URD 2023 page 103).

Group (in tCO_2eq)	2022[a]	2023	2024	2025	2026	2027	2028	2029	2030	Targets 2050
Scope 1 *(absolute value)*	24,093	24,215	22,163	19,504	16,773	14,954	13,010	11,059	8,770	
Scope 1 *(percentage as of emissions of base year)*		*3%*	*-6%*	*-17%*	*-29%*	*-36%*	*-45%*	*-53%*	*-63%*	
Scope 2 (Market-based) *(absolute value)*	185,280	205,362	195,094	185,339	172,366	151,682	128,929	101,854	74,863	
Scope 2 (Market-based) *(percentage as of emissions of base year)*		*11%*	*5%*	*0%*	*-7%*	*-18%*	*-30%*	*-45%*	*-60%*	
Total Scopes 1 + 2 (Market-based) *(absolute value)*	**209,373**	**229,577**	**217,257**	**204,843**	**189,139**	**166,636**	**141,940**	**112,913**	**83,633**	**20,937**
Total Scopes 1 + 2 (Market-based) *(percentage as of emissions of base year)*		***+10%***	***+4%***	***-2%***	***-9%***	***-20%***	***-32%***	***-46%***	***-60%***	***-90%***
Total Scope 3 (*Market-based*)[a] *(absolute value)*	**979,569**	**1,176,813**	**1,153,278**	**1,095,614**	**986,053**	**867,726**	**754,922**	**641,684**	**526,181**	**97,957**
Total Scope 3 (*Market-based*)[a] *(percentage as of emissions of base year)*		***+20%***	***+18%***	***+12%***	***+1%***	***-11%***	***-23%***	***-34%***	***-46%***	***-90%***
Total Scope 1 + 2 + 3 (*Market-based*)[a] *(absolute value)*	**1,188,942**	**1,406,390**	**1,370,535**	**1,300,457**	**1,175,191**	**1,034,362**	**896,861**	**754,596**	**609,813**	**118,894**
Total Scope 1 + 2 + 3 (*Market-based*)[a] *(percentage as of emissions of base year)*		**+18%**	**+15%**	**+9%**	**-1%**	**-13%**	**-25%**	**-37%**	**-49%**	**-90%**

(a) Including Zefiro.

Projected carbon pathway

The Group is expecting to see a controlled increase in its emissions for a few more years before beginning to reduce its absolute emissions in line with the pathway validated by the SBTi.

Scope 1 emissions

The tracked Scope 1 emissions (direct emissions) are:

- vehicle fuel;
- heating and energy for our generators (fuel oil and natural gas);
- refrigerants used in our cooling systems.

More than 80% of scope 1 emissions are linked to the vehicle fleet. The Group plans to reduce these emissions by including more electric vehicles in its fleet, from 5% in 2024 to 40% in 2030 and 100% in 2050 and by efficiently planning the vehicle journeys and routes of its technicians. As mentioned above, investments are also performed in infrastructures and especially in EV charging points.

Additionally, the Group aims to reduce refrigerant gas leaks by adopting a policy of enhanced maintenance of installations, using refrigerants with a lower global warming potential wherever possible.

Scope 2 emissions

iliad has chosen to set targets on market-based emissions as this allows to integrate the effect of its purchases of guaranteed-origin renewable energy and Power Purchase Agreements (PPAs). Total renewable energy share is projected to increase from 62% in 2024 to 95% in 2030 and 100% in 2050. PPA contracts on the other hand are projected to increase from 0% in 2022 to 27% in 2030 and 70% in 2050.

However, iliad is aware that the priority is to control and reduce its energy use. For location-based Scope 2 emissions, iliad expects these to increase by approximately 20% until 2025 compared with 2022 and then level out in 2026 before coming down. The expected increase is mainly due to the growing subscribers' base and usages. Therefore, the Group needs to provide these new subscribers with the equipment and services required for meeting the commitments it has made (rollout of 5G and fiber nationwide). Its investment in these technologies makes sense from an environmental point of view, as they deliver energy savings over time and are designed to last. Decommissioning of old technologies such as 3G or ADSL will also decrease carbon intensity.

Scope 3 emissions

Regarding emissions related to use of products, iliad forecasts a strong decrease according to projected evolution of national electricity mixes, especially in Poland which account for 77% of this category emissions.

The iliad Group also aims to reduce emissions from Capital Goods and Purchased of goods and services by increasing the share of refurbished products and decreasing the share of new products and overall reducing production emission factors. As such, our teams aim to refurbish at least 90% of the boxes returned to us by subscribers. The 10% that cannot be restored are boxes that have been seriously damaged. To reach our targets, we closely monitor the rate of Freebox returns and the production refurbishment rate for Freebox. For more information, please visit E5.

Lastly, the Group plans to decrease the emissions from business travel by reducing the number of air travel in favour of more train travels or remote meetings.

Emission reporting and baseline year

iliad conducts annual carbon footprint assessments to ensure accuracy and transparency. The company reports emissions by comparing each year's emissions against targets from the 2022 baseline for its operations in France, Poland, and Italy. iliad integrates adjustments due to changes in reporting boundaries, such as joint ventures, into emissions reporting and target setting, relative to the 2022 baseline.

E1-5 - Energy consumption and mix

Telecom networks account for most of the Group's electricity consumption. In view of the sharp rise in data traffic, all the players in the industry expect to see a future increase in their networks' overall electricity usage.

The iliad Group is doing its upmost to optimize the energy efficiency of its networks. The Group has undertaken to step up its energy efficiency measures even more and use load shedding[1] for its data centers if the national grid comes under stress. However, this quest for energy efficiency cannot be to the detriment of our networks providing good coverage across the country. Access to a high-quality communications network is a major factor for social inclusion, which the Group has worked hard to encourage since its creation.

- **Group electricity consumption** *(in GWh)*

	2022 (incl. Zefiro over 12 months)	**2023**	**2024**
Building consumption	23	24	21
Network consumption	1,598	1,741	1,988
Core network	*76*	*93*	*94*
Data centers	*142*	*159*	*198*
ADSL network	*120*	*97*	*93*
FTTH network (HFC/FTTx in Poland)	*79*	*71*	*81*
Mobile network	*1,181*	*1,322*	*1,521*
Vehicle electricity	0	0.19	0.21
Heating/cooling network	9	5	6
Total	**1,630 GWh**	**1,770 GWh**	**2,015 GWh**
Total excluding heating/cooling network	1,622	1,765	2,009
Consumption – France	924	962	1,083
Consumption – Italy	379	427	490
Consumption – Poland	328	381	442

(1) A temporary reduction in a site's use of grid electricity, in response to an external event (such as a cold spell) which leads to peaks in electricity consumption.

- **Group electricity consumption** *(in GWh)*

	2022 (incl. Zefiro over 12 months)	2023	2024
Total consumption from fossil sources	-	-	365
Total consumption from nuclear sources	-	-	406
Total energy consumption from renewable sources	-	-	1,244
Total	**1,630 GWh**	**1,770 GWh**	**2,015 GWh**
Percentage of energy consumption from fossil sources in total energy consumption	-	-	18%
Percentage of energy consumption from nuclear sources in total energy consumption	-	-	20%
Percentage of energy consumption from renewable sources in total energy consumption	-	-	62%
Fuel consumption from renewable sources	-	-	0
Consumption of self-generated non-fuel renewable energy	-	-	0
Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources	-	-	1,250
Non-renewable energy production	-	-	0
Renewable energy production	-	-	0
Total energy consumption from activities in high climate impact sectors	-	-	0

E1-6 - Gross Scopes 1, 2, 3 and Total GHG emissions

Methodologies and Calculation Tools

This section outlines iliad's gross greenhouse gas (GHG) emissions across Scopes 1, 2, and 3, following the GHG Protocol guidelines and uses the control approach methodology. It presents the Group's emissions data using both location-based and market-based accounting methods, in line with international standards. The figures reflect the total emissions from direct operations, energy consumption, and value chain activities, with a focus on transparency and accuracy in reporting. Year-on-year changes are also highlighted to provide insight into the Group's progress towards its emission reduction goals.

The iliad Group's emissions calculations are based on standards emission factors from ADEME, IEA (estimated), AIB 2021 and verified by external bodies, ensuring transparency and data accuracy.

Most of figures used to produce the GHG emissions are based on real consumption, nevertheless some figures are estimated. Indeed, some equipment are shared leading to rebilled energy and "indirect consumption" (e.g. towerco). The volume of indirect electricity consumption is estimated based on factors such as the type of equipment used, the number of subscribers, or other relevant elements for comparison with our equipment. Some other emissions are also estimated based on monetary expenses and estimated emission factors.

GHG Emissions

The following table shows the Group's annual carbon footprint using the market-based and location-based emissions accounting methods defined in the GHG Protocol Scope 2 Guidance.

Group *(in tCO_2eq)*	2022 (published non-financial performance statement)	2022 (incl. Zefiro over 12 months)	2023	2024	Year-on-year change
Scope 1	24,093	24,093	24,215	23,638	-2%
Scope 2 *(Location-based)*	320,392	336,872	369,076	432,525	17%
Scope 2 *(Market-based)*	149,826	185,280	205,362	245,560	20%
Total Scopes 1 + 2 *(Location-based)*	**344,485**	**360,965**	**393,291**	**456,163**	**16%**
Total Scopes 1 + 2 *(Market-based)*	**173,919**	**209,373**	**229,577**	**269,198**	**17%**
Scope 3 C1. Purchased goods and services	ND	ND	273,333	277,628	2%
Scope 3 C2. Capital goods	ND	ND	492,866	425,592	-14%
Scope 3 C3. Fuel- and energy-related activities not included in Scope 1 or Scope 2 *(Location-based)*	ND	ND	109,737	125,724	15%
Scope 3 C3. Fuel- and energy-related activities not included in Scope 1 or Scope 2 *(Market-based)*	ND	ND	75,518	78,082	3%
Scope 3 C4. Upstream transportation and distribution	ND	ND	2,880	1,869	-35%
Scope 3 C5. Waste	ND	ND	5,886	5,156	-12%
Scope 3 C6. Business travel	ND	ND	1,845	958	-48%
Scope 3 C7. Employee commuting	ND	ND	12,586	13,524	7%
Scope 3 C9. Downstream transportation and distribution	ND	ND	3,420	3,966	16%
Scope 3 C11. Use of sold products	ND	ND	307,119	319,640	4%
Scope 3 C12. End-of-life treatment of sold products	ND	ND	1,360	1,369	1%
Total Scope 3 *(Location-based)*	**1,026,323**	**1,009,868**	**1,211,032**	**1,175,426**	**-3%**
Total Scope 3 *(Market-based)*	**986,756**	**979,569**	**1,176,813**	**1,127,784**	**-4%**
Total Scopes 1 + 2 + 3 *(Location-based)*	**1,370,808**	**1,370,833**	**1,604,323**	**1,631,589**	**2%**
Total Scopes 1 + 2 + 3 *(Market-based)*	**1,160,675**	**1,188,942**	**1,406,390**	**1,396,982**	**-1%**
Group carbon intensity *(in tCO_2eq/million EUR)*					
GHG emissions intensity, location-based *(total GHG emissions per net revenue)*	**ND**	**ND**	**ND**	**163**	**-%**
GHG emissions intensity, market-based *(total GHG emissions per net revenue)*	**ND**	**ND**	**ND**	**139**	**-%**
Net revenue *(in million EUR)*	**ND**	**ND**	**ND**	**10,024**	**-%**
Net revenue used to calculate GHG intensity *(in million EUR)*	**ND**	**ND**	**ND**	**10,024**	**-%**
Net revenue other than used to calculate GHG intensity *(in million EUR)*	**ND**	**ND**	**ND**	**0**	**-%**

Observed carbon trajectory

The observed carbon trajectory is closely linked to the iliad Group's strong growth in 2024, as it was the fastest-growing operator in Europe by revenue, with a +7.1% increase. Organic growth was strong, with over 2 million new subscribers and a significant expansion of our network infrastructure. Staying true to our ambition to provide the best connectivity to as many people as possible, the Group is investing heavily in rolling out next-generation networks. This includes the commissioning of more than 1,500 new mobile sites in France, 1,000 in Italy and 900 in Poland. To meet the high regulatory requirements for mobile coverage in rural areas, this sustained deployment is expected to continue over the coming years.

In 2024, Scope 1 and 2 market-based emissions rose by 17% compared to 2023, reaching 269,198 tons of CO_2. This increase was primarily driven by a 13% rise in electricity consumption across Mobile and Fixed activities, which alone accounted for an additional 40,712 tons of CO_2.

Total electricity consumption rose by 14% in 2024, reaching 2,015 GWh. Of this, 62% was sourced from renewables (via Guarantees of Origin and Power Purchase Agreements), 20% from nuclear—reflecting the national energy mix in France and Italy—and 18% from fossil fuels. The iliad Group continues to strengthen its renewable energy strategy through long-term contracts (3 PPAs signed in France, Italy, and Poland in 2024) and by engaging with key providers.

Scope 1 emissions

Despite the Group's strong growth and expanded activities, Scope 1 emissions decreased by 2% globally, primarily driven by reductions in company vehicle emissions. This improvement results from efforts, highlighting the effectiveness of its fleet policy, which includes optimizing travel distances and advancing fleet electrification in France, Poland, and Italy. The combined share of electric and hybrid vehicles rose by 9 percentage points, to reach 22%, representing a total of 1,249 vehicles, including 301 electric cars – or 5% of the total fleet.

Scope 2 location based-emissions

The 16% increase in Scope 2 location-based emissions is mainly driven by a combination of rising grid emission factors in France and increased electricity consumption across mobile and fixed activities – both of which are experiencing strong growth. Within mobile and fixed activities, the increase is primarily due to:

- the expansion of mobile sites network (+3,400 sites in 2024);
- a 4% rise in mobile subscribers and 3% in fixed subscribers;
- a 17% increase in average data usage per user, enabled by the ongoing deployment of 5G, offering faster speeds, lower latency, and greater capacity.

Emissions from data centers also contributed to the increase, though to a lesser extent. In 2024, data centers represented 10% of total electricity consumption, with a 25% rise driven by the deployment of new servers, particularly to support artificial intelligence workloads.

Scope 2 market-based emissions

The Group's market-based Scope 2 emissions variation in 2024 aligns with the location-based variation. There has been an increase in electricity volumes covered by PPAs and the purchase of electricity with renewable guarantees of origin (1,250 GWh in 2024 vs. 1,109 GWh in 2022).

Scope 3 emissions

Market-based Scope 3 emissions decreased by 4% compared to 2023, totaling 1,127,784 tons of CO_2. This decrease is mainly driven by strong investments made in previous years to roll out fiber optics – whose deployment needs have significantly decreased in 2024 – and by a slight decrease in antenna deployments rhythm. It reflects a reduced operational need and a strong decrease in Capital Goods emissions.

Capital Goods (Category 2) and Use of Sold Products (Category 11) are the main contributors to Scope 3 emissions, together accounting for nearly two-thirds of the total and showing the most significant changes:

- **Capital Goods**: Emissions decreased by 14% (-67,274 tons of CO_2), primarily due to fewer installations and a slower pace of infrastructure deployment;
- **Use of Sold Products**: Emissions rose by 4% (+12,521 tons of CO_2), reflecting the growth in fixed subscribers across all three countries. While energy efficiency improvements help mitigate the rise, increased usage and higher emission factors contributed to the overall increase. The Group continues to reduce the environmental impact of Freebox devices by designing more compact, eco-friendly models that improve energy efficiency and lower subscribers' electricity use.

Conclusion

In 2024, iliad's emissions increased, mainly due to higher electricity consumption driven by growing infrastructure, data demand and subscriber numbers. While significant past infrastructure investments helped curb Scope 3 emissions, the rollout of new technologies and expanding network usage contributed to a rise in Scope 2 emissions. Despite this rebound effect, iliad remains committed to balancing technological advancement with energy efficiency by investing in next-generation equipment, expanding 5G deployment, and enhancing infrastructure across both urban and rural areas.

France (in tCO_2eq)	2022	2023	2024	Year- on-year change
Scope 1	18,642	19,460	18,923	-3%
Scope 2 (*Location-based*)	37,529	35,653	47,072	32%
Scope 2 (*Market-based*)	16,189	15,928	19,720	24%
Total Scopes 1 + 2 *(Location-based)*	**56,171**	**55,113**	**65,995**	**20%**
Total Scopes 1 + 2 *(Market-based)*	**34,831**	**35,388**	**38,644**	**9%**
Total Scope 3 *(Location-based)*	**411,618**	**562,233**	**535,615**	**-5%**
Total Scope 3 *(Market-based)*	**407,768**	**568,306**	**539,085**	**-5%**
Total Scopes 1 + 2 + 3 *(Location-based)*	**467,789**	**617,346**	**601,610**	**-3%**
Total Scopes 1 + 2 + 3 *(Market-based)*	**442,599**	**603,695**	**577,728**	**-4%**

Italy (in tCO_2eq)	2022 (published non-financial performance statement)	2022 (incl. Zefiro over 12 months)	2023	2024	Year-on-year change
Scope 1	1,711	1,711	1,208	1,270	5%
Scope 2 (*Location-based*)	76,701	93,181	105,094	120,575	15%
Scope 2 (*Market-based*)	43,381	78,834	83,584	123,077	47%
Total Scopes 1 + 2 *(Location-based)*	**78,412**	**94,293**	**106,302**	**121,845**	**15%**
Total Scopes 1 + 2 *(Market-based)*	**45,092**	**79,946**	**84,791**	**124,347**	**47%**
Total Scope 3 *(Location-based)*	**148,580**	**142,843**	**131,448**	**124,348**	**-5%**
Total Scope 3 *(Market-based)*	**136,605**	**135,521**	**110,611**	**99,853**	**-10%**
Total Scopes 1 + 2 + 3 *(Location-based)*	**226,992**	**237,136**	**237,749**	**246,193**	**4%**
Total Scopes 1 + 2 + 3 *(Market-based)*	**181,697**	**215,467**	**195,403**	**224,200**	**15%**

Poland (in tCO_2eq)	2022	2023	2024	Year-on-year change
Scope 1	3,740	3,547	3,445	-3%
Scope 2 (*Location-based*)	206,162	228,329	264,878	16%
Scope 2 (*Market-based*)	90,257	105,850	102,763	-3%
Total Scopes 1 + 2 *(Location-based)*	**209,902**	**231,876**	**268,323**	**16%**
Total Scopes 1 + 2 *(Market-based)*	**93,997**	**109,397**	**106,207**	**-3%**
Total Scope 3 *(Location-based)*	**466,125**	**517,351**	**515,463**	**0%**
Total Scope 3 *(Market-based)*	**442,383**	**497,896**	**488,846**	**-2%**
Total Scopes 1 + 2 + 3 *(Location-based)*	**676,027**	**749,227**	**783,786**	**5%**
Total Scopes 1 + 2 + 3 *(Market-based)*	**536,380**	**607,293**	**595,054**	**-2%**

- **GHG Intensity**

GHG emissions intensity, location-based (total GHG emissions per net revenue)	163 tCO_2eq/million EUR
GHG emissions intensity, market-based (total GHG emissions per net revenue)	139 tCO_2eq/million EUR

- **Financial reconciliation**

Net revenue	10,024 € million
Net revenue used to calculate GHG intensity	10,024 € million
Net revenue other than used to calculate GHG intensity	0 € million

- **Contractual instruments**

	Value	Unit
Percentage of contractual instruments, Scope 2 GHG emissions	63	%
Percentage of contractual instruments used for sale and purchase of energy bundled with attributes about energy generation in relation to Scope 2 GHG emissions	1	%
Percentage of contractual instruments used for sale and purchase of unbundled energy attribute claims in relation to Scope 2 GHG emissions	62	%

Greenhouse gas emissions calculation method

Scope 1 GHG emissions

iliad's Scope 1 emissions are calculated using suitable activity data and consistent emission factors, excluding any removals or carbon credits. The company ensures that emissions from stationary combustion, mobile combustion, process emissions, and fugitive emissions are accurately measured. For iliad, scope 1 emissions are mainly related to vehicle fuel, heating and energy for the generators and refrigerants used in the cooling systems.

Scope 2 GHG emissions and contractual instruments

iliad's tracked Scope 2 emissions, linked to direct electricity consumption, include electricity for our fixed and mobile networks, for our data centers and our buildings.

While the location-based method enables iliad to establish an initial emissions footprint for its operations, the market-based method provides precise accounting by focusing on emissions from contractually acquired electricity. Central to this strategy are Guarantees of Origin (GOs) and Renewable Energy Certificates (RECs), which certify that the electricity purchased is derived from renewable sources. GOs, in particular, trace each megawatt-hour to ensure renewable origin and prevent double-counting, enhancing transparency in energy sourcing.

iliad's procurement of GOs and engagement in PPAs reflects a strategic integration into its sustainability goals. The reported procurement of 1,250 GWh backed by GOs and PPAs in 2024 highlights tangible commitment to reducing iliad's carbon emissions.

iliad's comprehensive approach to Scope 2 emissions through contractual instruments aligns with international and regulatory sustainability targets. It employs a framework centered on GOs and PPAs, substantiating its renewable claims and underscoring a strategic emphasis on environmental responsibility (more information on this framework is available in E1-1). This illustrates iliad's continual dedication to transparency in energy sourcing and emissions management.

Scope 3 GHG Emissions

Reporting boundaries for estimating scope 3 emissions

The iliad Group computes Scope 3 GHG emissions following Control Approach methodology defined by GHG Protocol. This ensures a thorough accounting of upstream and downstream indirect emissions.

Significant Scope 3 categories for iliad include purchased goods and services, capital goods, transport and distribution (upstream and downstream). Emissions are calculated using a variety of methods, such as supplier-specific, spend-based, and distance-based methods.

Calculation methods and tools for Scope 3 GHG emissions

1. **Purchased Goods and Services**: supplier-specific method (life-cycle assessment GHG data from suppliers) and spend-based method (purchases of services).
2. **Capital Goods**: supplier-specific method (life-cycle assessment GHG data from suppliers) and average-product method (manufacturing of our customer-premises equipment (CPE); civil work for new radio mobile sites).
3. **Fuel-and-energy-related activities**: supplier-specific method (purchase of electricity from renewable sources, using for each renewable technology upstream emission factors from Base Empreinte© ADEME) and average-data method (purchase of fuels and electricity from non-renewable sources, using upstream energy emission factors from Base Empreinte© ADEME and IEA).
4. **Upstream transportation and distribution**: distance-based method (collecting mass, distance and mode of each shipment from the shippers, then applying the appropriate mass-distance well-to-wheel emission factors for the mode of shipment used).
5. **Waste generated in operations**: waste-type-specific method.

6. **Business travel**: supplier-specific method (business travel agency) and spend-based method (expense reports).
7. **Employee commuting**: average-data method (number of employees, average commuting distance per city, modal share for each country).
8. **Downstream transportation and distribution**: supplier-specific method (GHG emissions directly provided by our shippers).
9. **Use of sold products**: Accounts for emissions arising through the operational use of iliad's products. Direct use-phase emissions for sold products (expected lifetime of product x number sold in reporting year x electricity consumption x electricity emission factor) and for leased products (number leased x electricity consumption over the lifespan x electricity emission factor).
10. **End of life treatment of sold products**: supplier-specific method (life-cycle assessment GHG data from suppliers providing the breakdown for the end of life phase).

Categories 8, 10, 13, 14, and 15 are not applicable due to the nature of iliad's operations:

- **Category 8** Upstream Leased Assets: iliad does not operate leased assets.
- **Category 10** Processing Of Sold Products: not applicable, iliad does not produce products for further processing by third parties, as per GHG Protocol.
- **Category 13** Downstream Leased Assets: see Category 8.
- **Category 14** Franchises: iliad does not have any franchises.
- **Category 15** Investments: GHG Protocol states that for the Control Approach methodology, iliad does not account GHG emissions from operations not controlled (see chapter 3 Setting Organizational Boundaries, p.19). As iliad has minority interests without control over them, Category 15 is void.

E1-7 - GHG removals and GHG mitigation projects financed through carbon credits

In addition to its efforts to reduce its GHG emissions, iliad's strategy emphasizes enhancing natural carbon sinks and leveraging nature-based solutions to mitigate emissions. The company is actively developing carbon sink projects to enhance natural reservoirs like forests, focusing on biogenic methods to bolster carbon removal through increased forest coverage and ecosystem diversity. These initiatives are aligned with iliad's commitment to achieving net-zero emissions by 2050, with interim goals for substantial reductions in scopes 1, 2, and 3 emissions by 2030.

Projects and carbon storage

iliad's commitment is exemplified through its key projects certified under the Label Bas-Carbone by the French Ministry of Ecological Transition. Notable projects include:

- **le Bois de l'Abbaye**: spanning 21.8 hectares, this project commits to planting 27,601 trees with an anticipated carbon storage capacity of 5,850 tonnes CO_2eq over 30 years;
- **le Bois de la Croix Verte**: the project focuses on regenerating formerly abandoned agricultural spaces; Covering 5.05 hectares, this site plans to plant 7740 trees, aiming to store 1,141 tonnes CO_2eq in a similar timeframe;
- **le Bois de Saint-Clair**: the project aims to reforest storm-damaged land in Normandy, sequestering around 592 tCO_2eq over 30 years through diverse tree planting;
- **le Verger de la Plaine**: the project is to reduce 396 tCO_2eq over 20 years through almond orchard plantings in Auvergne-Rhône-Alpes.

Carbon sink Projects	Project type	Surface *(hectare)*	Nb of planted trees	Timeline *(nb years)*	Carbon storage *(tCO_2eq)*
Bois de Saint-Clair (Normandy, France)	Reforestation	4.00	7,000	30	592
Bois de la Croix Verte (Pays de Loire, France)	Afforestation	5.05	7,740	30	1,141
Bois de l'Abbaye (Centre, Val de Loire, France)	Afforestation	21.80	27, 601	30	5,850
Verger de la Plaine (AURA, France)	Orchard plantation	9.35	2,580	20	396
Total Emission absorption					**7,979**

Nature-based and technological solutions

Focusing on biogenic methods, iliad's projects bolster carbon removal via increased forest coverage and ecosystem diversity. The introduction of both broadleaf and coniferous tree species facilitates resilience against disease and climate variability, reducing reversal risks.

Methodologies and frameworks applied

The iliad Group implements detailed and certified methodologies for managing GHG removals and storage, focusing on projects under the French Label Bas-Carbone. The methodologies applied by iliad utilize ADEME and GHG Protocol tools approved by the Ministry of the Ecological Transition (MTE) to ensure accuracy in quantifying carbon benefits. The frameworks used account for tree diversity, location, and long-term storage potentials, reinforcing the project's objectives over an estimated thirty-year span.

Risk management and non-permanence

The iliad Group partners with STOCK CO_2 to secure external verification and apply security discounts on projected carbon savings. This dual verification by the Ministry of Ecological Transition and STOCK CO_2 ensures adherence to high standards and reliable carbon storage. Methodologies validated by ADEME and GHG Protocol support transparency and credibility in carbon management outcomes.

Contribution to global carbon neutrality

The iliad Group GHG trajectories are not involving use of carbon credits yet and the Group ensures that its use of carbon credits does not hinder its GHG reduction objectives. However, iliad is committed to contributing to global carbon neutrality by ultimately offsetting the emissions it is unable to avoid.

E1-8 - Internal carbon pricing

At present, there is no internal carbon pricing mechanism at iliad. There is a lack of the necessary infrastructure or expertise within the group to implement this solution. The integration of GHG emission issue into the internal budget process is currently being examined.

E1-9 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities

The anticipated financial impact of significant physical and transitional risks and potential climate-related opportunities is currently being assessed. This should be included in the 2025 Sustainability Report.

4.4 E3 - Water and marine resources

In 2024, iliad identified water-related risks within its data center and cloud services operations under OPCORE and Scaleway. This section focuses on these areas.

In the following section, iliad will address ESRS E3 requirements on:

- **Impact, Risk, and Opportunity Management**: Assessing water risks in data center operations;
- **Metrics and Targets**: Tracking water consumption and related financial impacts.

Following the DMA, the material IROs addressed in the following sections are listed hereafter:

ID	IRO type	IROs	VC location	Time horizon
6	Risk	Operational risk due to high water consumption by data centers	Own operations	Medium term
7	Negative impact	Negative image due to high water consumption of data centers	Own operations	Medium term

Impact, risk and opportunity management

E3.IRO-1 - Description of the processes to identify and assess material water and marine resources-related impacts, risks and opportunities

As part of the process for identifying material topics, iliad conducted a screening of its main activities and assets to identify possible water-related issues, including those linked to water quantity, water quality, and marine resources. This exercise was carried out in 2024 by iliad as part of its Double Materiality Assessment, as outlined in section ESRS 2. The screening revealed that iliad's activities are not significantly linked to water-related issues except for its data center activities and its cloud services related, which fall under iliad's subsidiaries OPCORE (responsible for Data Centers (DC) buildings and infrastructures) and Scaleway (responsible for DC computers and servers). Consequently, this section (ESRS E3) focuses exclusively on OPCORE's and Scaleway's operations.

At Scaleway and OPCORE, water consumption and efficiency are monitored in real-time and at a granular level, enabling the identification of potential risks and opportunities. As part of this monitoring, a review of risks related to water usage in data centers is conducted during the implementation of ISO 50001 policies, which include water management and related risks (e.g., the risk of drought). As of now, the vast majority of data centers used by Scaleway are equipped with closed-loop water cooling systems - a technology that helps limit water consumption while ensuring efficient cooling of equipment.

Additionally, a water stress screening was conducted using the Aqueduct Water Risk Atlas 4.0 tool to assess the water stress levels as of 2024 in areas where OPCORE's and Scaleway's data centers are located. The model used is PCR-GLOBWB2.

OPCORE's data centers are situated in France, in the Greater Paris area, Lyon, Marseille and in Poland. All these locations have been classified as low to low-medium water risk areas.

Scaleway is mainly running its data centers on OPCORE's facilities and in other data centers located in the region of Amsterdam, and in Poland, specifically in Warsaw and Katowice. All these locations have been classified as low to medium water risk areas as calculated with Aqueduct tools. As mentioned in ESRS E1, an additional climate risk assessment (incl. water risk) is on-going, results will be detailed in 2025. Consequently, the following section does not include specific information regarding areas at high water risk or experiencing high water stress.

Regarding water management and the identification of related IRO for the DMA, it shall be noted that:

- experts' reports were reviewed and dedicated subject-matter experts were interviewed to assess potential risks. This analysis revealed that, apart from data centers, iliad's water consumption and usage are very low compared to other industries. This is mainly due to cooling technologies used by OPCORE and Scaleway. Unlike most competing cloud providers or data center operators, iliad does not use water cooling towers in its data centers;
- finally, for new large project such as new data center design and building, iliad conducts surveys and local impact analyses as required by regulation.

Therefore, the decision was confirmed to consider water resources as material only in the context of water consumption for Cloud/data center activities. Please note that all descriptions and comments in E3 apply exclusively to OPCORE and Scaleway.

E3-1 - Policies related to water and marine resources

Overview

The iliad Group demonstrates a commitment to environmental sustainability through its corporate strategies and has aligned this policy with ISO 50001. This encompasses responsible water resource management, and adherence to relevant regulations. Due to the small size of water consumption (except for DC5) and the fact that no water is extracted from river/ocean, dedicated policy covers both energy and water consumption topics. Thus, current policy, aligned with ISO 50001, covers both the use of water resources in own operations (including sustainable use, reduction of water withdrawal) and the use of electricity.

This section details policy related to water and related topics (e.g. use of Water Usage Effectiveness – WUE, international standard, water treatment, product design...).

Policy

The iliad Group has developed a policy to manage impacts and risks related to water resources through a comprehensive approach encompassing reduction of water consumption, promotion of sustainable water use, and reduction of water withdrawals and discharges. This policy covers all aspects of water resource management within OPCORE's operations, integrating considerations of environmental protection across all departments and enabling a holistic management approach.

The policy is overseen by the manager in charge of Sustainability within OPCORE and integrated with the ISO 50001 standards. Coordination is made across departments to achieve policy objectives.

The policy involves internal teams, and external experts (e.g. ISO consultant) in water management. Internal teams monitor and manage water usage and quality, while external experts provide insights for continuous improvement and compliance.

This policy directly addresses the two identified IROs — operational risk related to water consumption and brand image.

Product and service design

The Company designs its data centers to use less water by implementing several strategies:

- **Site Selection**: When choosing locations for new data centers, the Company conducts analyses to avoid areas identified as water risk zones (cf. aqueduct). This ensures that the facilities are built in regions where water scarcity is less of a concern;
- **Cooling Systems**: The design of cooling systems is optimized to minimize water consumption. For instance, if a site is in a water-scarce area – which is not the case as of today – the cooling systems will be designed to use less water or alternative cooling methods that do not rely heavily on water;
- **Monitoring and Management**: OPCORE utilizes monitoring programs to track water usage effectively. The Company has adopted a tracking system of Water Usage Effectiveness (WUE) metric within its data center operations to allow real-time adjustments and optimizations in water consumption;
- **Regulatory Compliance**: OPCORE adheres to local regulations regarding water management, which includes maintaining disconnectors to prevent contamination of the water supply and ensuring that all water management practices are compliant with environmental standards.

By integrating these strategies, the company aims to reduce its overall water footprint while maintaining efficient operations in its data centers, to minimize risk and cost related to water consumption and negative image due to high water consumption of data centers in sensitive areas.

E3-2 - Actions and resources related to water and marine resources

Water consumption monitoring and reduction

OPCORE is focused on managing water resources in its data centers, aiming to improve Water Usage Effectiveness (WUE) through comprehensive monitoring and water reduction practices for all its data center. This includes:

- ongoing measurement of WUE to assess performance and identify areas for improvement;

- regular checks for leaks and ensuring tightness of closed circuits in cooling systems;
- monitoring the quality of water in cooling circuits, including during reverse osmosis and softener regeneration cycles;
- inspection of dry coolers and free chillers to ensure no leaks or excessive encrustation.

Futhermore, Scaleway decided to increase transparency on energy and water consumption by rolling out an Environmental Footprint Calculator that allow end user to monitor multiple indicators of their cloud services, including CO_2 footprint and water consumption. Measurements are publicly available and shared with clients, with most actions carried out daily.

Climatic adaptation in data centers

In response to climate conditions, OPCORE is adapting its data center operations to handle heatwaves without increasing water consumption while ensuring energy efficiency to indirectly reduce future water stress. Main actions encompass:

- control of adiabatic cooling valve settings based on external temperatures to optimize water usage during heatwaves;
- implementation of spray systems for dry coolers and free chillers during peak heat, with automation to adjust usage as needed;
- seasonal measures, such as hibernation of adiabatic cooling systems during cooler months;
- cleaning and maintenance of membranes and cooling components to maintain efficiency under varying climatic conditions.

We also opt for closed circuits when water is used for cooling. These actions are immediate, ongoing, or launched on an ad-hoc basis (on data center by data center basis) depending on maintenance needs, considering climatical changes.

Infrastructure efficiency programs

Enhancing infrastructure efficiency is a key focus for OPCORE, which is modernizing its systems to prevent water waste. Main actions do include:

- balancing and adjusting valve settings to ensure efficient water flow and minimize waste. Introduction of new cooling systems with enhanced water-saving technologies in future data center rooms;
- modernizing equipment, such as upgrading free chillers and softeners, to improve operational efficiency and reduce water consumption.

These actions—mostly granular—are immediate, ongoing, or launched on an ad-hoc basis (on data center by data center basis) depending mainly on maintenance needs.

For details of how iliad implements the adiabatic cooling process to enhance water management at data center DC5, please refer to the section *Actions for optimizing energy use for data centers* in E1-3. This section explains how we integrate evaporative and air cooling into a single system, using a minimal amount of water to reduce temperatures efficiently.

These actions directly address the two identified IROs—operational risk related to water consumption and brand image—highlighted in E3-IRO.1. They all aim to reducing water consumption and improving water efficiency of data center.

Metrics and targets

E3-3 - Targets related to water and marine resources

Overview

Key indicators such as WUE and water consumption are closely monitored at all levels of the organization and through the operational process including daily monitoring, activity performance review, dedicated committees, reporting to investors/other.

Activity performance review (incl. ISO 50001) and other committees allow to ensure strong monitoring of those indicators and take sound choices of them (e.g. use of low consumption technology to ensure reduction of water consumption.

Currently, no data center with significant water consumption were identified in high water risk area – to be fully confirmed after ongoing climate risk analysis. Potential additional actions might be taken using conclusions of those analysis.

The following sections outline our water targets, including actions, descriptions, progress, and processes.

Water Usage Efficiency (WUE)

The Group uses Water Usage Effectiveness (WUE) indicator for its data centers, which is measured by dividing the amount of water used (in liters) for the cooling systems by the amount of electricity used (in kWh) for the services provided by the data center. Scaleway and Opcore are working closely to set up targets even though the current performance is good.

The target will be established through energy management reviews and involve various stakeholders, including the OPCORE team, Head of DC Operations, Compliance Manager, and energy governance team under the ISO 50001 framework.

E3-4 - Water consumption

The table below presents relevant performance indicators for data centers. Due to the water efficient adiabatic technology, water consumption is relatively weak compared to the sector.

As a result, in 2024, the water consumption of the data centers was monitored, recording a low volume of 8,158 m³ for an an average WUE at 0.06 L/kWh. The reported values are based on the receipts water company's receipts.

	2022	2023	2024
Total water consumption *(m³)*	-	-	8,158
Total water consumption in areas at water risk, including areas of high-water stress *(m³)*	-	-	0
Total water recycled and reused *(m³)*	-	-	0
Total water stored *(m³)*	-	-	234
Changes in water storage *(m³)*	-	-	NA
% of the measure obtained from direct measurement *(m³)*	-	-	100
Water intensity ratio *(L/kWh)*	0.04	0.06	0.06

4.5 E5 - Resource use and circular economy

In this section, iliad will address the ESRS E5 requirements on **Resource Use and Circular Economy**, covering:

- **Impact, Risk, and Opportunity Management**: Assessing the impacts, risks, and opportunities related to resource use and circular economy practices;
- **Metrics and Targets**: Defining targets for resource efficiency, circularity, and waste reduction, and evaluating the financial impacts of circular economy.

Following the DMA, the material IROs addressed in the following sections are listed hereafter:

ID	IRO type	IROs	VC location	Time horizon
8	Opportunity	Sharing, reusing and recycling hardware to reduce costs and attract clients in search of sustainable products	Own operations and Downstream	Short term
9	Negative Impact	Resource depletion and waste production due to hardware manufacturing and end of life	Upstream and Own operations	Short term

Impact, risk and opportunity management

Circular economy offers ways of rethinking our production and consumption models to optimize the use of natural resources and reduce waste. Through the circular economy principles of Refuse, Reduce, Repair, Refurbish and Recycle, we are incorporating this approach more and more into our businesses across our three geographies.

Since 2002, the Group has brought eight generations of Freebox to market, each featuring the latest technological innovations. From design to transportation and recycling of the Freebox, our teams work hard to reduce their environmental impact and act across the value chain to fight programmed obsolescence. All our Freebox are designed according to the same principles, by exclusively selecting long-lasting technologies and materials for both the hardware and software components.

E5 IRO-1 - Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities

While performing its double materiality approach (cf. ESRS 2), iliad places a strong emphasis on the circular economy by:

- analyzing best circular economy practices (e.g.: recycling and resource efficiency, device and equipment lifecycle management, supplier and partner collaboration, consumer engagement);
- conducting interviews with key stakeholders on these topics including internal and external stakeholders, such as heads of networks and Freebox, network component providers, IT hardware providers...

E5-1 - Policies related to resource use and circular economy

The following paragraphs describe iliad's principles and objectives in terms of circular economy. Even though not all those policies are formalized as stand-alone documents, the elements described hereafter are nevertheless aligned with iliad operational practices and actions.

Sustainability by design

Optimize the design of our product and services to enhance product lifespan and circular economy

As a European leader in telecommunications and Cloud services, our teams are constantly designing innovative networks, products, data centers and implementing cutting-edge technologies. To meet our environmental commitments, sustainability must be integrated into the design phase. This approach ensures the maximization of product lifespan and usage while minimizing material requirements, energy consumption, electronic waste, and resource depletion.

Those best practices apply to products we design, from network engineering to cloud services design. However, given iliad's unique characteristics, these principles have been primarily developed and applied to the design of the Freebox. With the Freebox, we are seeking to enter a usage economy rather than one of ownership, where the repair of our equipment is anticipated and facilitated from the design phase.

To ensure sustainability is incorporated at the design phase, several key principles guide our approach:

- **repairable products and features**: By making repairs and updates easier, we reduce the need to manufacture new devices, extending the lifecycle of existing products;
- **minimizing the use of virgin resources and ensure proper recycling**: This includes the use of recycled materials when possible and efforts to mitigate the negative impacts of frequent upgrades;
- **minimizing energy consumption**: Energy efficiency is prioritized when possible, across all product and service designs;
- **modularity for disassembly and updates**: Products are designed with modularity in mind, enabling easier disassembly, repairs, and updates – both hardware and software. Our expertise in both areas allows us to implement smart updates;
- **impact evaluation**: Life Cycle Analysis (LCA) is used when possible, to assess and mitigate the environmental impact of our products throughout their lifespan.

Optimize Product Life Cycle

To align with circular economy best practices, we are committed to extending the lifecycle of our equipment and that of our clients' devices by leveraging:

- **refurbishment and reconditioning**: repairing and reusing equipment to extend its usability and reduce the need for new production;
- **upcycling and Recycling**: Transforming used materials into new, higher-value products and ensuring proper recycling to minimize electronic waste and resource depletion;
- **utilization of Secondary and Recycled Resources**: Prioritizing the use of recycled and sustainable materials in the production of new equipment to reduce reliance on virgin resources and decrease environmental impact.

Our Group stands out for its environmentally responsible choices relating to mobile phones. We chose not to make sales of mobile phones a key aspect of our marketing strategy when we entered the mobile services market in 2012 and have kept that approach ever since. We have always refused to encourage our subscribers to replace their mobile phones before necessary and we intend to hold firm to this policy.

Manage product end of life and waste management

This policy outlines our commitment to managing the end-of-life phase of our products and addressing waste management in alignment with circular economy principles. As developed in E5-5, to manage resource outflows efficiently we aim at:

- minimize waste generation;
- promote recycling and upcycling;
- ensure proper waste management by facilitating responsible disposal and collection methods for end-of-life products.

It applies to all product lines, operations, and stakeholders, ensuring sustainable practices including:

- products sold or provided to our customers, manufactured by iliad or not (e.g.: Freebox, Mobile Phones...);
- data Centers (OpCore) & Servers (Scaleway);
- network elements (e.g.: Antennas & Freebox Network Cables (Fiber & ADSL)).

These elements are closely aligned with a structural principle taken by iliad in 2021: zero waste to landfill. Indeed some materials such as foam and polymers can't be recycled to create raw materials. Our teams are committed to ensuring that none of this waste is sent to landfill. This ambitious commitment, which sets us apart in the industrial sector, means that we need to find appropriate solutions for recycling each material.

Furthermore, the Group ensures that it complies with the applicable regulations regarding the recycling of waste generated by its activities.

E5-2 - Actions and resources related to resource use and circular economy,

Freebox

The Freebox, iliad's flagship product, has been the Group's showcase since its beginnings. The Group is an outlier in its industry because the Freebox is designed, engineered and managed entirely in-house by a dedicated entity. Thanks to this specific way of working, we can control the design of our products and optimize each stage of the production process to extend their lifespans and also make it easier to refurbish or recycle the majority of their components.

To reduce the environmental footprint of Freebox, action must be taken across the value chain, from the design stage, through each production phase, and up to shipment to the subscriber. The next paragraphs apply to Freebox sold in France and in Italy, where the commercial name is iliadbox. It also refers to Freebox Pro sold for Business to Business market in France. It excludes modems and routers sold in Poland.

Extending the lifespans of our Freebox from the design and manufacture stage to fight against programmed obsolescence

A specific factor for our design teams to consider is that Freebox are provided rather than sold to our subscribers and therefore remain the Group's property. With this in mind, they are designed to last and to be used for as long as possible. When a subscriber returns their Freebox, we must be able to put it back into circulation. As a result, our boxes are designed from the outset to make them as easy as possible to repair and restore to the highest current-day market standards.

Our own R&D center control all our product design and production processes based on an overall eco-design approach:

- for each new generation of our Freebox, we focus on making the products more compact and reducing the quantity of raw materials used in their production & in the packaging. For example, production of the Freebox Pop needs just a quarter of the materials used for the Freebox Revolution;
- we promote the use of recycled materials as much as possible. Design choices are made to prioritize the well-controlled materials like the Acrylonitrile Butadiene Styrene (ABS) for plastic recycling possibilities;
- we apply a modular design approach, enabling certain electronic components to be changed so that equipment can be upgraded to the latest market standards without having to completely replace it. This is achieved through the in-house development of both hardware and software. For instance, the WiFi cards in our boxes can be taken out separately and our teams can replace them with new cards. Given that WiFi standards are upgraded every two or three years, this design concept ensures that our boxes can last for more than ten years while integrating the latest technologies;
- our Freebox are also designed from the outset to make it as easy as possible for most of the components to be repaired and restored, by choosing easily repairable materials and suitable assembly techniques. For example, we avoid gluing parts together, which would make them difficult to repair and using screws instead.

Monitor lifecycle of Freebox

To monitor the impact of our products, we are continuing our work on Life Cycle Assessments (LCA) for all Freebox so we can get a more precise picture of their environmental footprint and improve the eco-design of future generations of products. These assessments are conducted according to a protocol based on the main principles of ISO 14040, using the EIME tool developed by Bureau Veritas. It creates an eco-passport by product in line with the approach adopted by the European Commission in 2013. Life Cycle Assessments are used to apply a multi-criteria approach to analyzing the environmental impact of a product or system over its entire life cycle.

For additional information regarding the reduction of GHG emissions associated with our products, please consult ESRS E1.

Reducing the amount of packaging and optimizing its use

For several years now, the Group has sought to design robust and reusable packaging. We have significantly reduced our utilization of single-use packaging, and our processes for preparing parcels for delivery to subscribers minimize the use of cardboard boxes. Our research teams have designed packaging made only of biodegradable materials and recycled paper.

It is shaped and sized in line with the boxes it contains, which reduce the amount of paper required and the carbon impact of the transportation chain. Freebox packaging is designed to be resistant throughout the boxes' life cycle and ensure its primary function of maintaining quality standards in transport. Subscribers are encouraged to keep their packaging so it can be used to return Freebox in the event of cancellations or for after-sales service or exchange.

Ensuring the reuse and upcycling of our Freebox

By designing products with their entire life cycle in mind, our teams can refurbish most of the boxes returned to us by subscribers. The Freebox that cannot be restored are boxes that have been seriously damaged (e.g.: water or electrical damages). Apart from these exceptional cases, generally our boxes can last for at least ten years, and they can be refurbished as many times as necessary for as long as they continue to feature in our commercial offers. The Freebox Revolution, for example – which was launched at the end of 2010 and is still marketed – has a lifespan estimated to be more than 10 years.

Key elements linked to Freebox's refurbishment process:

- whenever subscribers change their offer or terminate their subscription, the equipment provided to them must be returned in good working order. Efforts have been made to optimize the user experience, streamline the shipping process, and communicate the importance of Freebox refurbishment to subscribers. If the box is not returned, the subscriber may incur a penalty;
- returned products undergo through cosmetic and functional inspections to ensure quality and performance;
- the plastic casing, key plastic component of the boxes, is either polished, if the plastic is compatible, or melted down to create new top cases if they are too damaged;
- all repairable motherboards and electro-mechanical parts (accessories, connector cables, remote controls, gamepads, power supply units, other accessories, etc.) are repaired and restored to as good as new. Damaged motherboards and accessories that can't be repaired are sent to specialist providers to be recycled into raw materials.

Refurbishment process occurs in dedicated Freebox infrastructures for collection and refurbishment in France or elsewhere in Europe (3 plants, 2 in France and 1 in Czech Republic). This process enables material updates which are carried out as needed to extend the product's lifespan (e.g., Wi-Fi chip replacements).

In 2024, c. 101 M€ of CapEx were dedicated to refurbishment of our Freebox.

Our teams in France have set up partnerships with sheltered workshops which enable several hundreds of thousands of electro-mechanical accessories to be reintroduced into the production circuit each month. All our specialized industrial recycling partners are based locally, in France or Belgium.

Optimizing the recycling of our Freebox

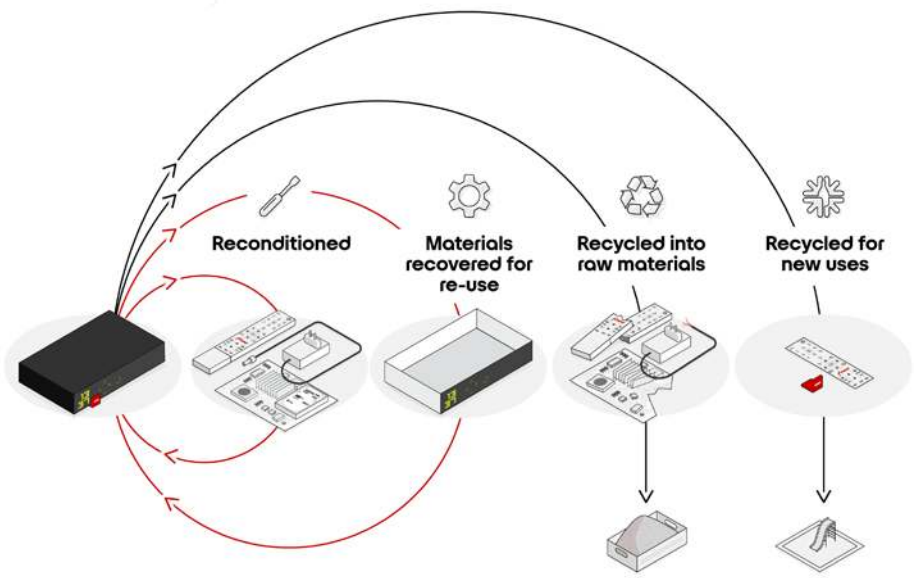
All waste generated by the Group's manufacturing operations, which make up the largest proportion of its total waste by volume, is sent to waste disposal providers, where it is fully recovered and/or recycled in accordance with the applicable European standards and regulations.

Some 80% of the plastic used when the cover on the Freebox Revolution is changed is recycled plastic and the leftover ground plastic is sold to other industries that use the material for their own purposes:

- in 2021, our teams came up with an innovative solution to the problem of recycling expanded polyethylene foam contained in returned products. They were recycled into synthetic football pitch underlay by a specialized partner located in the Netherlands;
- in 2022, our teams picked out a French supplier that recycles elastomers into ground covering for children's play areas. Thanks to our partnership with this company, 45 tonnes of plastic waste from Freebox Revolution remote controls and USB connectors were recycled.

For managing its Waste from Electrical and Electronic Equipment (WEEE), the Group uses registered waste disposal providers & partnerships with recycling facilities (e.g.: Veolia).

The Freebox Revolution, a textbook example



Subscriber equipment management in Poland

In Poland, Play's approach to subscriber equipment management is based on a rental model. This enables reuse and minimizes waste. Instead of selling the equipment to customers, it is made available for the duration of the service, and at the end of the contract the equipment is returned, refurbished and put back into use. This maximizes its lifespan and reduces the use of raw material.

Leased fixed subscriber equipment is available for various services. In designing the devices, particular attention is paid to the materials used in their manufacture. TV boxes and fiber routers are made from recyclable ABS plastic, and the unit packaging is made from FSC-certified cardboard, printed without the use of 100% mineral oils. In addition, the remote-control unit housings consist of 95% PCR plastic and are packaged in paper bags, eliminating plastic and foil from the packaging process.

About 1.1 million devices were installed and lent to customers in 2024, and a significant proportion of devices were refurbished (about 340 thousand), ensuring their reuse. The average lifespan of our ex UPC subscriber devices are 7.6 years, although for some models exceeds 10 years. To maximize the lifespan of CPE units, damaged external components are replaced, such as housings or front panels, with new ones or subject them to a refurbishment process through polishing and painting. In addition, if it is economically justified to repair the equipment, we recondition and treat it for further use.

Equipment returned by customers is tested, repaired and remanufactured to extend its lifecycle, and put back into use when it meets the required standards. In 2024, the efficiency of the Polish refurbishment process, i.e. the number of appliances successfully brought back into service, was between 81-95% depending on the model.

Responsible packaging management is also a priority. Play has been working on a complete overhaul of its packaging since 2022, based on five steps:

- identifying environmentally damaging packaging that can be easily replaced;
- maximizing the use of packaging and cushioning materials intended to be re-used;
- redesigning the packaging used for e-commerce so that the equipment is custom-packed, which optimizes transportation;
- replacing plastic packaging tape by paper tape;
- sorting unused cardboard and putting it in baler machines for it to be turned into recycled paper.

For Play servers refurbishment, half of the packaging used is original packaging from returns. For ex UPC devices, we use 100% purchased packaging for refurbishment. All packaging used for refurbishment is FSC certified. Bulk packaging from the logistics process is reused for B2B shipments, returns from installation sites or selectively collected, sorted and sent for recycling.

Mobile phones: advocating for smartphone longevity since the beginning

In France, 79% of the digital sector's carbon footprint is due to the manufacture and use of devices and hardware, with mobile phones accounting for 20% of that figure. They also use large quantities of critical resources. Extending their lifespans has therefore become essential.

Free

Since its inception in 2012, Free has adhered to responsible sales practices and is now taking it a step further by expanding the promotion of refurbished phones in its offerings and actively encouraging customers to extend the lifespan of their mobile devices.

With Free Flex, our subscribers can get a mobile phone with no hidden strings attached, as the cost of the plan is totally separate from the cost of the phone. Which means that people aren't encouraged to change their old phone for a new one before they need to. Furthermore, our Free Flex phone leasing offer, launched in 2021, includes a selection of refurbished mobiles, and all the phones returned at the end of a Free Flex contract are either refurbished or recycled, depending on their condition.

In France, the Group has included refurbished models in its mobile phone offering for several years now. They are available online as well as in our stores, where they are displayed in working mode and can be handled by customers. Free works closely in France with two specialists in this area, PRS (Phone Recycle Solution) and Recommerce.

A partnership agreement with CertiDeal was announced in June 2022, which gives both existing and new Free Mobile subscribers the best prices and warranties for refurbished phones, with discounts of up to 10%. Over 1,000 product references refurbished in France are proposed on the CertiDeal platform, all tested and certified and offering a 24-month warranty and included protection (a case and screen protector) to ensure their long lifespan.

With Free Flex, our subscribers can get a mobile phone with no hidden strings attached, as the cost of the plan is totally separate from the cost of the phone. Which means that people aren't encouraged to change their old phone for a new one before they need to. Furthermore, our Free Flex phone leasing offer, launched in 2021, includes a selection of refurbished mobiles, and all the phones returned at the end of a Free Flex contract are either refurbished or recycled, depending on their condition.

iliad Italy

In Italy, a similar partnership agreement was launched in June 2024, which gives iliad subscribers the opportunity to purchase refurbished smartphones, with a 12 month warranty and a discount up to 8%. In the first six months, refurbished phones accounted for 4% of total annual mobile phone sales, despite sales of refurbished devices only starting at the end of June. Raising public awareness about the benefits of refurbishing and the circular economy is also essential in Italy to boost sales of refurbished phones.

Play

In 2024, in Poland, Play offered high quality grade A+/AA+ refurbished iPhones with new supplier. Moreover, Play offers used devices as a result of repairing and regenerating processes after 14-days returns and rental offers. Polish refurbished mobile phone market is at the very beginning of its journey, but at the same time, customers have high expectations to price and quality of the chosen devices.

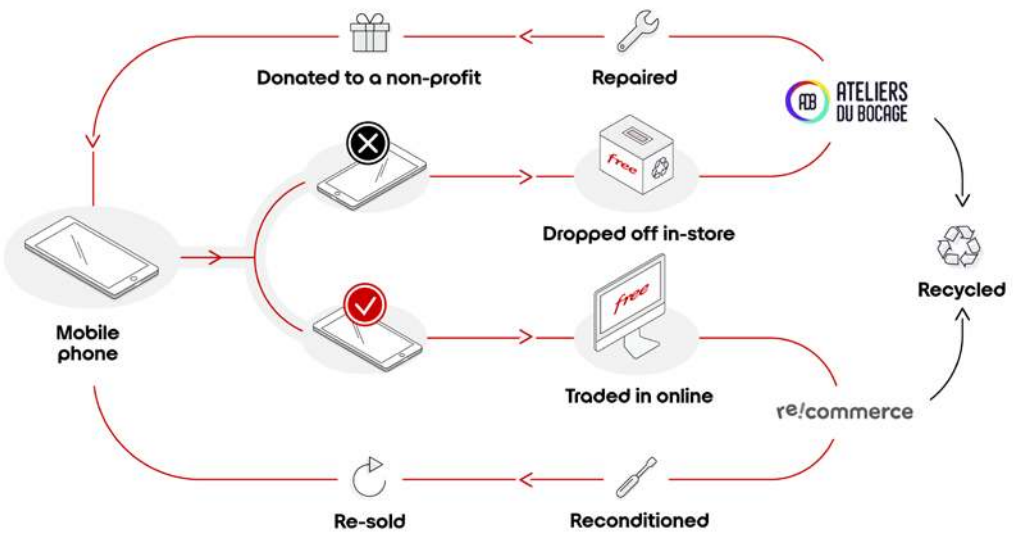
A trade-in offer is also available for subscribers' old phones, which can be used regardless of whether the phone was purchased from us. As an incentive, subscribers get a trade-in bonus in some cases. Old phones are examined and then refurbished to be put back into circulation.

Collecting and recycling used mobile phones

In parallel and in line with our climate pledge #5, to raise awareness among both our existing and prospective subscribers, we have set up programs throughout France for reusing and recycling mobile phones, encouraging people not to leave old phones lying around that could be reused or recycled. We have already equipped all our stores in France and Poland with drop-off boxes for used phones and accessories, so they can be recycled. The boxes are placed where people can see and access them easily. By the end of 2024, this included around 700 stores in Poland and 240 in France. Italy is still exploring how to implement these initiatives.

In France, when our sales advisors are given their induction training, they follow a specific module on refurbishment. The Free Foundation has teamed up with Ateliers du Bocage, a non-profit organization which is a member of the Emmaüs charity network, for the dropped-off phones to be recycled or reused. Phones that are no longer in working condition or are obsolete are recycled, and those that still work are repaired and redistributed free of charge. And the system also contributes to inclusive employment, as Ateliers du Bocage employs disadvantaged jobseekers and people with disabilities.

A virtuous circular process



GSMA is a partner since 2023, providing best practices and new standards for reducing suppliers' carbon emissions and promoting the circular economy.

In February 2023, the iliad Group joined the GSMA (Global System for Mobile Communications Association), which brings together over 1,000 mobile operators and businesses across the ecosystem and related industries to adopt best practices and advance innovation. The Group is an active participant in the working groups organized by the GSMA on issues relating to reducing suppliers' carbon emissions and Scope 3 emissions, and the circular economy.

Data centers & cloud services

Extending the lifespans of servers and hard drives

The manufacture and use of servers, especially in cloud industry have a significant environmental impact. According to a study published by ADEME in the beginning of 2025, 46% of the carbon impact of digital technology in France is linked to data centers. [(1)]

The iliad Group data centers and cloud solutions services are mainly operated by two entities: OpCore for data centers and Scaleway for servers. At end-2024, the iliad Group operated 14 data centers: eight in France via its subsidiaries Scaleway and Free Pro and six in Poland via its subsidiary 3S.

Scaleway, our entity dedicated to cloud offerings, has developed three circular economy programs to extend the lifespans of servers and hard drives:

- in 2019, the "Nursery" program was launched to maximize the lifespan of hard drives. After enabling the refurbishment of 18,500 hard drives in its first few years, the program was industrialized in 2023, allowing the number of refurbished drives to reach around 38,000 in 2024.

  Thanks to a special machine and software designed by our teams, each hard drive's wear and tear is checked, which acts as a sorting process. Hard drives in good condition are wiped in a fully secure way to avoid any data leaks; and the others are destroyed and sent for recycling by a specialized service provider.

  On average, 28% of our hard drives can be reused after their first lifecycle;

- the Transformers program, launched in 2021, concerns our servers, and more specifically those within the scope of our Dedibox offering (dedicated servers) that are reaching the end of their service life. The initial objective was to extend the life of 14,000 servers that were already seven or eight years old, giving them an extra three to four years of life.

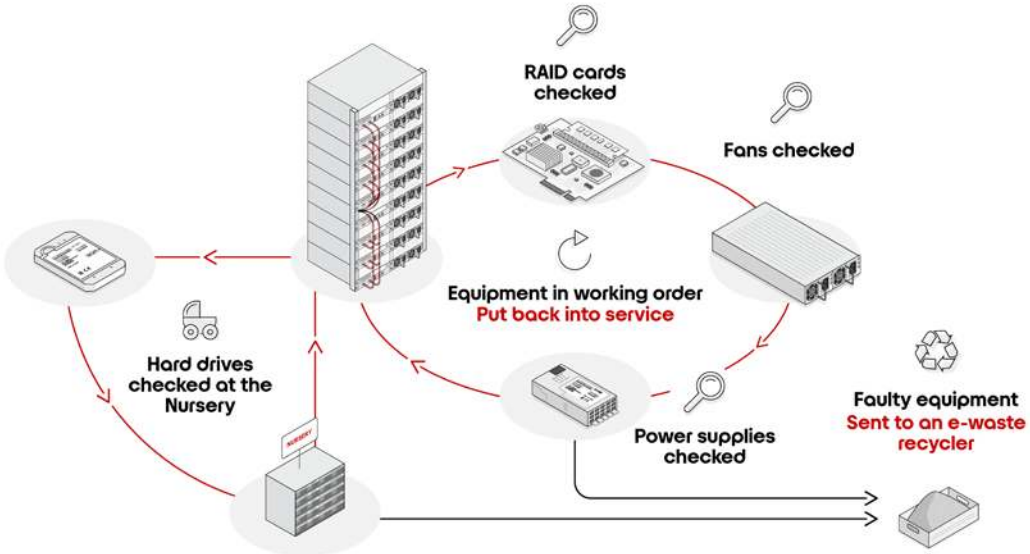
  The Dedibox servers are taken apart, their hard drives removed, and their different components (power supply, fans and RAID cards) checked. All equipment in good working order is then put back into service and faulty equipment is sent to an approved e-waste recycler;

  — some 10,000 servers went through this process in 2023, year of the "industrialization" stage. With this program, Scaleway can extend the lifespan of its servers to up to ten years, whereas they're usually thrown away after three or four years. In 2024, the last 1.010 servers eligible for the Transformers program have been refurbished;

- a new program, Orion, is in development. Following in the footsteps of Transformers, Scaleway is actively working on releasing this program, which focuses on the more complex refurbishment of instance servers, going beyond the bare-metal scope of Transformers.

(1) ADEME (2025), https://infos.ademe.fr/magazine-janvier-2025/numerique-quel-impact-environnemental-en-2022/

The Transformers and Nursery programs



In Poland, Play consistently implements measures to optimize its data center infrastructure, extend equipment life and minimize environmental impact. We have implemented elements of BMS systems in our twenty-one HUBs to monitor environmental conditions. This also allows us to manage temperature distribution maps of the facilities.

Regular technical inspections are carried out and thermal imaging measurements, including of power supply connections, switchgear, generators and battery disconnectors. Through cyclical plant inspections, we gradually decommission equipment that is no longer in use.

Equipment that can still perform its function is given a second life. Old equipment, including servers and used batteries from UPS systems, is resold, allowing it to be reused and reducing e-waste.

Optimize resource usage with colocation services

OpCore's colocation service offers a flexible approach to data center resource optimization, allowing customers to rent spaces as small as a quarter-rack. This model promotes infrastructure sharing among multiple companies, maximizing resource utilization and reducing the need for new physical infrastructure. The service combines flexible pricing, efficient resource allocation, and customizable solutions to meet diverse client needs.

Network elements

The iliad Group is constantly upgrading its network, and its radio engineering teams regularly add capacity to its base stations. Each year, the Group maintains and ramps up the capacity of our fleet of mobile masts – currently comprising around 28,400 in France 18,400 in Italy (including Zefiro) and 12,400 in Poland – and deployed in 2024 close to 4,200 new masts across the 3 geographies. Since 2022, we have reconditioned the radio units and digital equipment still in a good state of repair and re-used them on our proprietary network.

Launch of a mobile antenna refurbishment program in France to optimize network elements resource and battery usage

Amphenol Antenna Solutions, one of our long-standing suppliers, launched a new antenna concept, called Integra. Integra antennas can be dismantled, upgraded and re-used several times, therefore considerably reducing the number of antennas that reach end of life each year. The concept was adopted by our radio engineering teams, who asked that Amphenol Antenna Solutions extend the approach to antennas from other suppliers that had not yet benefited from this technological advancement.

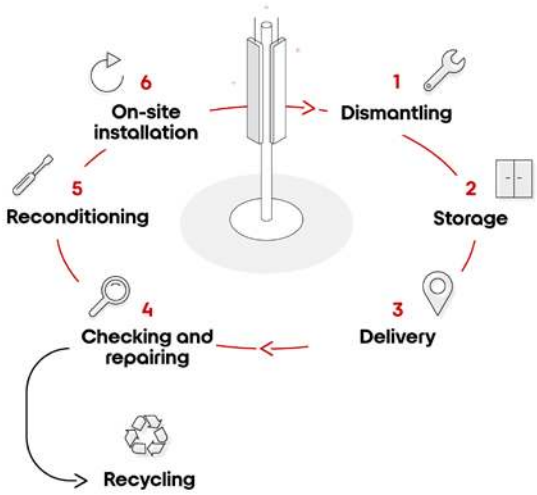
In March 2023, Free launched a program called Vérification Bon Fonctionnement (VBF) – an innovative initiative to check whether used mobile antennas are still in working order and can therefore be refurbished and be used again on other mobile masts, therefore extending their lifespans.

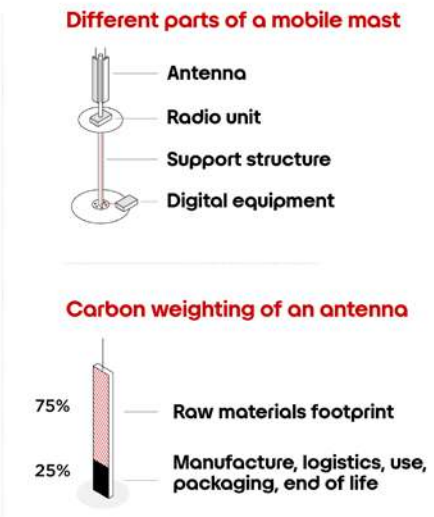
On average, a mobile mast comprises three antennas, some of which are replaced regularly to increase their capacity in phase with technological upgrades. Until now, obsolete antennas were taken down and recycled by approved Waste Electrical and Electronic Equipment (WEEE) recycling firms and replaced by new antennas. With the VBF program, when an antenna is taken down from one of our mobile masts it's sent to our partner Amphenol Antenna Solutions to be checked, upgraded and, if necessary, repaired, before being refurbished and installed on a new mast. This delays the antennas' obsolescence, and they can remain in service for two to three times longer than before.

Thanks to the VBF program's success in delaying obsolescence, the antennas remain in service for two to three times longer. Given that 75% of an antenna's carbon emissions [1] are generated by the extraction of the materials used in its manufacture, the program is also an important lever for reducing the mobile network's carbon footprint. A collection is also performed on batteries for maintenance and potential recycling.

(1) Amphenol Jaybeam Wireless in-house study, 2022.

The VBF program





Extending Equipment Lifespan and Reuse in Poland

In Poland, the life of Hybrid Fiber-Coax active equipment is extended as much as possible –network equipment in the infrastructure is still operational after up to 20 years old, and servers supporting cloud services have had their life extended from five to seven years.

In our mobile operations, dismantled equipment recovered during network modernization is actively reused. In 2024, such equipment was deployed at 2,580 sites, ranging from small components such as combiners to large infrastructure elements such as cabinets, antennas and radio remote units (RRUs). In total, over 15,500 network elements were successfully integrated.

Obsolete equipment that is no longer recommended for use follows a structured disposal process. It is either sold to our partner, who refurbishes and resells it, or responsibly scrapped by an external electronic waste management company. In addition, our partner provides maintenance services for selected equipment, including the refurbishment of 88 RRUs in 2024. Moreover, 191 cabinets were refurbished last year and are scheduled for reuse in 2025.

Metrics and targets

E5-3 - Targets related to resource use and circular economy

To reach our targets, we closely monitor our targets as disclosed below.

Targets related to Freebox

iliad's key commitments for Freebox circular economy were set forth in our 2021 climate strategy and pledge:

- enhancing the environmental performance of our Freebox by implementing a Life Cycle Assessment (LCA) process to guide eco-design. (#4); and
- reducing our subscribers' energy consumption by at least 15% by 2025. (#4).

Our team aims to refurbish at least 90% of the boxes returned to us by subscribers. The 10% that cannot be restored are boxes that have been seriously damaged.

The target is set in collaboration with stakeholders involved in the circular economy strategy, including internal sustainability teams.

Targets related to data centers

As a signatory of the European Code of Conduct for Data Centers, iliad outlined its key commitments to the circular economy in the 2021 climate pledge #3, aiming to ensure advanced environmental performance in its data centers through the following actions:

- roll out the adiabatic cooling process to all our new data centers;
- extend the useful lives of our equipment to up to 10 years;
- include information about energy use and carbon emissions on our customer invoices.

The "Nursery" program was launched in 2019 to prolong the lifespan of hard drives. After refurbishing over 12,000 hard drives in 2024, Scaleway is predicting the program to get back to normal in 2025 and aims to recondition 7,000 hard drives in the same year. The strong performance in 2024 is primarily driven by the Company's focus on the program.

Targets related to mobile phones

iliad's key commitments for mobile phone circular economy were outlined in our 2021 climate pledge # 5: Deploy an environmentally- friendly sales strategy:

- reject strategies that encourage replacing mobile phones before necessary;
- encourage drop-off of used phones in our Free stores;
- support non-profit organizations that collect e-waste for reuse and recycling.

As a member of the GSMA, in May 2023, the Group pledged that by 2030, collections for refurbishment will correspond to 20% of the mobile phones purchased by our subscribers.

E5-4 - Resource inflows

Overview of resource inflows and methodology

As part of our carbon emissions assessment, we conducted a comprehensive analysis of inflows in alignment with the Greenhouse Gas (GHG) Protocol. This analysis included evaluating the resources and inputs essential to our operations, such as energy consumption, raw materials, and supply chain activities, to ensure a thorough understanding of their impact. The results of this exercise were subsequently validated by the Science Based Targets initiative (SBTi), confirming the robustness of our methodology and our commitment to aligning with globally recognized climate standards.

Raw materials and sustainable supply chains

Access to raw materials can significantly impact production, particularly for IT components sourced from Asia. The semiconductor crisis, which emerged in the wake of Covid-19, severely affected the production of devices such as set-top boxes and other electronic equipment. It is only recently that supply chains and production levels are beginning to return to normal. This situation aligns with the transition risks outlined in ESRS E1, which highlight the vulnerabilities and challenges associated with resource availability and supply chain disruptions.

iliad's telecommunications and cloud operations require significant raw materials. Please find below a synthesis of the most important raw materials to run our activities.

Freebox

This production is mainly dependent to the production of plastic casing, the motherboards and various chips included in the modem and packaging to deliver the box to customers. The key raw materials found on the value chain to build Freebox are among others: Plastics, Polymers and Silicon; Glass and ceramics; Chemicals and coatings; Batteries for portable routers; Metals and carbon (e.g., aluminum, rare earth elements); Cardboard packaging...

Telecommunications equipment and infrastructure

This production is mainly dependent to the production of fiber optics, equipment and technology (antennas, routers, storage units, servers, data centers infrastructure...) and cell towers (mainly concrete and metals).

Please note that for technological elements, raw materials are mainly the same as for Freebox production.

Mobile phones

For mobile phones production we resell, the raw materials are mainly the same as the one used for Freebox production with some other components (magnets, synthetic sapphire...).

Data centers

Regarding data centers and cloud services, raw materials are mainly the same as for Freebox production.

Other inflows

To support our activities, iliad relies on several key resources:

- Water usage – Used in cooling systems and certain manufacturing processes (see ESRS E3);
- Energy Inputs – Includes electricity (renewable and non-renewable) and fuels for backup generators (see ESRS E1);
- Refrigerant Gases – Required for cooling and air conditioning systems;
- Property – Facilities supporting our operations;
- Vehicles – Used for logistics, maintenance, and mobility;
- IT equipment: Essential tools and hardware for employees.

Data measurement and reporting accuracy

(in tonnes)	2022	2023	2024
The overall total weight of products and technical and biological materials used	-	-	5,420
Optical Fiber	-	-	1,617
Mobile Communications antennas	-	-	185
Data center	-	-	254
Freebox	-	-	3,365

The total material weight is computed based on assumptions and real data. The data for fiber optic cables, mobile communication antennas and servers is estimated. For Optic Fiber, the total length of purchased cables by type is multiplied by the associated average weight per unit of length. To determine the total weight of antennas, the number of new antennas deployed is multiplied by the average weight per unit. Regarding the servers, the total numbers of new servers is multiplied by the average weight of one server. On the other hand, Freebox weight is based on real data from shared by transporters.

The total material weight is primarily influenced by the production of the Freebox, with a smaller impact from the deployment of fiber optics. No biological materials are used in the manufacturing of the Freebox or other equipment.

Given the efforts to refurbish the Freebox and the various types of repairs carried out, iliad prioritizes tracking the share of refurbished Freebox. The Freebox team is taking measures to gather more detailed data on its components, including the percentage of reused or recycled parts, intermediary products, and materials.

E5-5 - Resource outflows

In accordance with the applicable regulations, the Group encourages the reuse of materials and then the recovery or recycling of its waste. Below are key highlights of metrics related to the outflow of products and materials in line with circular principles. However, it shall be noted that we continue working on enhancing our **quantification capabilities** in this area.

Overview: waste

In line with iliad's engagement to foster circular economy, the Company embraces a holistic approach to waste management across its operations. While efforts have been conducted to collect data waste, the detailed breakdown between reuse and recycle is not yet available. The company is actively working with the waste treatment facilities towards making these figures accessible in the future.

Waste

(in tons)	2022	2023	2024
Total Waste generated	-	-	5,695
Non-recycled waste	-	-	847
Percentage of non-recycled waste	-	-	15%
Total amount of hazardous waste	-	-	2,536
Total amount of radioactive waste	-	-	0

(in tons)	Total	Reuse	Recycle	Other
Hazardous waste diverted	2,526	-	-	-
Non-hazardous waste diverted	2,322	-	-	-

(in tons)	Total	Incineration	Landfill	Other
Hazardous waste directed to disposal	10	-	-	-
Non-hazardous waste directed to disposal	837	-	-	-

The total waste generated in 2024 was limited to 5,695 tons, with only 15% classified as non-recyclable. Most of the internal waste comes from refurbishing the Freebox. When a component can't be reused, it is processed and either reintegrated into our value chain or sold to a third party. If neither option is possible, it is sent for disposal.

Thanks to significant refurbishment efforts - particularly in managing electronic waste - most electrical components are recycled, with only 9 tons of electronic waste and 1 ton of other waste remaining non-recyclable.

Metrics related to Freebox

All waste generated by the Group's manufacturing operations – which make up the largest proportion of its total waste by volume – is sent to waste disposal providers, where it is recovered or disposed in accordance with the applicable European standards and regulations.

For managing its WEEE, the Group uses registered waste disposal providers.

Freebox waste generation

The waste generated by Freebox SAS is mainly plastic and electronic waste, which accounts for the bulk of the overall waste produced by the Group's operations.

This waste, which is treated by specialized providers, has a particularly high material and energy reuse/recycling rate.

- **Breakdown of waste evacuated by Freebox SAS**

(In tonnes)	2022	2023	2024
Plastics (including foams)	1,240	1,067	571
Metals	71	137	18
Other non-hazardous waste (cardboard, wood, etc.)	ND	2,011	280
Waste electrical and electronic equipment (WEEE)	945	1,494	1,760
o/w cables and wires	*177*	*220*	*194*
Other hazardous waste	ND	0	0
Total	**2,256**	**4,710**	**2,630**

After overproduction in 2023 to address the semiconductor shortage, and the resulting additional waste, levels have returned to 2022 figures, with a significant decrease in other non-hazardous waste.

Freebox return and refurbishment rate

As mentioned, Freebox and iliadboxes can last for at least ten years and be refurbished multiple times. To improve this refurbishment process, we closely monitor:

- Return Rate: the share of Freebox return by clients after they upgraded to a new offer or at the end of the contract;
- Production Refurbishment Rate: number of refurbished Freebox out of every 100 Freebox produced (including refurbished boxes);
- Return-to-Refurbish Rate: the number of Freebox refurbished out of every 100 Freebox sent to our reconditioning/recycling facilities.

Results for Freebox	2022	2023	2024
Return Rate	90.2%	89.9%	88.2%
Production Refurbishment Rate	61.1%	52.2%	39.7%
Return-to-Refurbish Rate	ND	ND	60%

In 2024, the Return Rate remains stable around 90%. On the other hand, the Production Refurbishment Rate decreased to 39.7%. This trend is explained by the release of the Freebox Ultra. The launch of a new box temporarily lowers the percentage, as most of Freebox entering in operation are brand new.

Finally, the overall Return-to-Refurbish-Rate stands at 60%. The rate varies significantly depending on the model and the update of the commercial offer. This rate varies significantly depending on the model and changes in the commercial offer. In 2024, the Freebox Crystal was discontinued, and all returned units will be recycled rather than refurbished.

Freebox use of recycled materials

As part of its commitment to sustainability, the Group has successfully integrated 80% recycled plastic into Freebox covers. This was realized in collaboration with material suppliers and sustainability experts to ensure the effective use of recycled materials. In addition to eco-design efforts, the Company has made significant progress in waste management, recycling over 2,000 tonnes of Freebox waste in 2024.

Metrics related to data centers

The Nursery program, launched in 2019, is an important initiative for Scaleway dedicated to refurbishing hard drives, enhancing equipment recyclability and delivering significant environmental and economic benefits. The program entered in industrialization phase in 2023, key metrics include:

- 18,500 hard drives refurbished between 2019-2022;
- ~12,375 hard drives refurbished in 2024;
- **~28%**: average reuse rate after first lifecycle.

Transformers Program, launched in 2021 dedicated to refurbishment of servers includes key metrics such as:

- 13,970 servers were refurbished between 2021-2023;
- 1,010 servers refurbished in 2024;
- lifespan extended from 4 years up to 10 years.

Metrics related to Mobile phones

As of today, reparability, and recyclability rate of this product group are not yet available. However, ongoing efforts are focused on improving assessment capabilities to provide this information in the future.

In 2024, 3% of the mobile devices sold by the Group were refurbished models. Although this proportion remains modest – partly due to the small price gap between financed new devices and refurbished ones – we are actively pursuing our efforts to encourage more responsible consumption. The rollout of refurbished devices through our FreeFlex offer marks a key milestone in making more sustainable alternatives accessible. In France, this consumption habit is more developed, with refurbished devices accounting for 6% of mobile sales. The iliad Group is committed to expanding this approach across all its markets, with a systematic focus on making refurbished options more widely available.

	2022	2023	2024
% of refurbished phones sold out of the total number of phones sold[(a)] (Group)	NA	2%	3%
% of refurbished phones sold out of the total number of phones sold[(a)] (France)	8.8%	6%	6%
% of refurbished phones sold out of the total number of phones sold[(a)] (Poland)	0.4%	0.5%	0.6%
% of refurbished phones sold out of the total number of phones sold[(a)] (Italy)	NA	NA	2%

(a) Excluding flash sales. Refurbished mobile phones were not sold in our Italian stores (phones are sold online and delivered at home).

4.6 S1 - Own workforce

The Group prioritizes inclusive, sustainable employment and local job growth while upholding human rights, labor rights, and diversity. Its policies align with international standards, including the United Nations Global Compact, Organization for Economic Co-operation and Development (OECD) Guidelines, International Labour Organization (ILO) Conventions, and the Sustainable Development Goals (SDGs), particularly in gender equality and reduction of inequalities.

This section outlines how workforce-related considerations are integrated into iliad's business through:

- **Strategy**: Incorporating workforce impacts into iliad's business strategy, considering stakeholder interests and material risks;
- **Impact, Risk, and Opportunity Management**: Policies, engagement processes, and actions to mitigate workforce-related risks while fostering positive impacts;
- **Metrics and Targets**: Key workforce indicators, including diversity, wages, training, health, and safety, ensuring accountability and continuous improvement.

The analysis will consider two identified risks as outlined below.

ID	IRO type	IROs	VC location	Time horizon
10	Risk	Lack of attractiveness due to underrepresentation of women in technical and leadership roles	Own operations	Short term
11	Risk	Increased turnover and loss of productivity due to poor employee wellbeing, wages and benefits	Own operations	Short term

Strategy

S1 SBM-2 - Interests and views of stakeholders

The iliad Group integrates employees' interests into its corporate strategy through various mechanisms. These include employee representation at the Board level and within the Board CSR committee, a strong focus on diversity and inclusion, proactive policies on health, safety, well-being, and fair compensation practices. The iliad Group also promotes career development and mobility, ensures continuous learning opportunities, and provides a whistleblowing system to safeguard employees' rights. By incorporating these elements, iliad strives to align its business strategy with employee interests, demonstrating transparency and responsiveness in workforce management.

S1 SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model

Managing material risks

The iliad Group recognizes the risk that gender imbalance poses to talent attraction, innovation, and overall business performance. As a tech Company that internalizes key technical functions – ranging from product development and IT systems to network deployment – our workforce is predominantly male, reflecting broader industry trends. This underrepresentation of women in technical and leadership roles could hinder our ability to attract and retain top talent, limiting the diversity of perspectives that drive creativity and problem-solving. Additionally, a lack of inclusivity may impact employee engagement, reduce productivity, and weaken long-term growth. Beyond reputational risks, failing to promote gender balance could also expose iliad to regulatory, legal, and financial consequences, reinforcing the strategic importance of addressing this issue proactively.

At iliad, our business model is built on the internalization of key competencies, particularly in technical fields, product development, and customer relations. This approach enables us to maintain a high level of quality, innovation, and cost efficiency while ensuring our market differentiation. In this context, increased turnover is not only a HR concern—it poses a direct strategic risk to our competitiveness and operational execution. The accelerated loss of highly skilled employees, who are difficult to replace due to the specialized nature of our roles and strong internal culture, can slow down innovation, disrupt operational continuity, and ultimately impact financial performance. Additionally, the cost of training and onboarding new talent, combined with the risk of diluting our company culture, reinforces the need to maintain an attractive work environment, competitive compensation policies, and a strong focus on employee well-being to mitigate this risk.

By addressing gender imbalance, employee well-being, and fair compensation, iliad strengthens its ability to attract and retain talent, fosters a more inclusive and innovative work environment, and enhances long-term business resilience and competitiveness.

Non-employees

The Group only occasionally engages non-employees, such as independent contractors or workers supplied by temporary employment agencies, as it prioritizes in-house work and the development of internal expertise. In 2024, the iliad Group recorded an average of nearly 300 non-employee workers, and as such, the exposure to risk is considered non-material. The Group will therefore only report on own workforce.

Environmental transition impacts

As mentioned in ESRS E1, iliad is implementing a transition plan towards environmental sustainability to reach objectives. As part of this process, the development of new skills related to energy efficiency, circular economy and more broadly to environmental technological advancements will play a key role in reaching our targets. This is a key opportunity for iliad workforce to develop new skills and competencies to support transition. However, the iliad Group does not identify major impacts on its own workforce regarding environmental transition plans.

Impacts, risks and opportunities management

S1-1 - Policies related to own workforce

The iliad Group's commitments towards its own workforce are operationalized through a set of policies and governance mechanisms, focusing on health and safety, talent development, fair treatment, diversity and inclusion, and ethical conduct.

Potential concerns on those policies can be raised through whistle-blowing system described in our public Code of Ethics and in the section *S1-3*.

Upholding Human Rights, Forced and child labor

The iliad Group's Code of Ethics lays down formalized commitments to uphold fundamental human and labor rights. This Code emphasizes transparency, trust, equality, and respect, and is mandatory for all employees. The Group adheres to international human rights conventions, including the UN Global Compact, OECD Guidelines, and ILO conventions. iliad's policies are aligned with internationally recognized instruments, ensuring respect for human rights and labor rights within its workforce. The Group maintains a zero-tolerance policy on breaches of its Code of Conduct.

The iliad Group's workforce is not involved in activities nor located in countries at risk in terms of exposure to violations of human and labor rights, such as forced labor or child labor.

Diversity, Equity & Inclusion Policy

For the iliad Group, Diversity, Equity and Inclusion (DE&I) are not just a policy – they are the very essence of our corporate mission. The promotion of DE&I as a way to ensure fair recruitment, evaluation, promotion, and compensation processes, is a key driver to attract and retain talented employees. This also strengthens our relationship with subscribers, who recognize and appreciate these efforts.

Since our inception, we have united talents from all backgrounds around a shared passion for technological innovation. The Group views digital technology as universal and seeks to attract diverse talent by focusing on its staffing acquisition strategy – today, 88 nationalities are represented across the Group. We firmly believe that the digital world, by its universal nature, transcends all boundaries and differences.

By ensuring equal opportunities and creating an inclusive work environment, we are building a company that reflects society—where every employee can thrive and perform at their best.

In 2024, iliad formalized its Group DE&I policy structured around three pillars and nine commitments outlined below, focusing on the promotion of diversity. For instance, gender equality, the integration of people with disabilities and from all ethnic, social, religious and political backgrounds, the inclusion of LGBTQIA+ individuals, along with generational recognition within our organization.

The policy applies to all 18,000 employees across all our activities and countries of operations, and aligns with local regulations, European directives, and international standards such as the CSRD and UN SDGs. Progress in DE&I initiatives is regularly assessed using specific indicators and employee feedback.

Fostering diversity across the organization

- increase the representation of women in technical roles and managerial positions;
- ensure that our recruitment processes focus solely on skills and potential, free from bias or discrimination;
- integrate individuals distant from the job market by offering specific initiatives that enhance their employability and foster their professional growth.

Ensuring equitable career paths

- develop fair processes for evaluation, promotion, and compensation based on objective and transparent criteria;
- guarantee pay equity for equivalent skills, roles, and experiences;
- encourage internal support networks focused on diversity and inclusion topics.

Promoting a safe & inclusive work environment

- adopt a zero-tolerance approach towards discrimination by implementing robust procedures to report and address discriminatory or unacceptable behaviors such as harassment;
- prevent by regularly training and raising awareness among teams on diversity issues, unconscious biases, and inclusive behaviors;
- adapt workspaces to meet the specific needs of individuals and foster personal and professional growth.

We firmly believe that diversity, equity, and inclusion can only become a reality through the active commitment of everyone. As displayed in S1-4, each employee is encouraged to act as an ambassador for these values by integrating these principles into their daily actions - whether through their interactions, decisions, or teamwork. Managers play a crucial role in fostering an inclusive culture within their teams, and local HR teams are in charge of implementing practices in line with the Group's DE&I policy through fair and transparent processes. The leadership team sets the tone by championing and prioritizing these principles.

Our ambition is to manage this policy with rigor and dedication, both locally and at Group level. This means implementing concrete and tailored actions in each country where we operate while ensuring global consistency through shared objectives, monitored by the Chief Sustainability Officer. We are committed to regularly assessing the progress made using specific indicators and feedback from employees, unions, and external stakeholders to ensure that diversity, equity, and inclusion remain a vibrant reality at the core of our Company.

Health, Safety and Well-being Policy

At the iliad Group, priority is given to creating a work environment that protects the physical and mental health of our people, fosters their well-being, and ensures their safety. It recognizes that fostering employee well-being can enhance retention and productivity, reduce recruitment and training costs, preserving knowledge, and strengthening its employer brand.

In 2024, iliad formalized its Group Health, Safety and Wellbeing policy, structured around three pillars and nine commitments outlined below, covering all aspects of our employees' activities and working conditions. This policy applies to all employees across all our activities and countries of operations, reflecting our adherence to global best practices, regulatory requirements, and our corporate values of care, respect, and responsibility. Managers are accountable for implementing safety measures, fostering a culture of prevention, and supporting employee well-being. Local HSE (Health, Safety and Environment) teams oversee the policy's implementation, ensuring compliance and monitoring progress through regular audits and reviews.

Providing a safe and secure work environment

- proactively identify, assess, and mitigate risks to prevent workplace accidents and occupational diseases;
- maintain health and safety management systems aligned with international standards;
- provide employees with adequate personal protective equipment and clear safety protocols tailored to their roles.

Promoting employee health and well-being

- offer comprehensive health coverage and resources that support both physical and mental health;
- foster work-life balance with flexible work arrangements and well-being initiatives;
- continuously enhance workplace environments to improve employee comfort, productivity, and satisfaction.

Building a culture of prevention and accountability

- deliver regular training and awareness programs to empower employees to recognize and address risks;
- engage employees and managers in actively contributing to health, safety, and well-being initiatives;
- monitor, audit, and refine health and safety practices through data analysis, ensuring continuous improvement and alignment with best practices.

Progress is measured through key performance indicators and feedback from employees and stakeholders. By prioritizing health, safety, and well-being, the iliad Group empowers employees to thrive, creating a resilient and successful organization for the future.

Talent Development and Learning Policy

At the iliad Group, we believe that skills development is a key driver for the growth of our employees and the success of our organization. In 2024, iliad formalized its Group Talent Development and Learning Policy to highlight our dedication to fostering a culture of continuous learning and to supporting employees in building their professional journeys. Aligned with the United Nations Sustainable Development Goals (SDGs), the policy applies to all employees of the iliad Group across all our activities and countries of operations, with no exclusions, and is overseen by Local HR Directors, ensuring alignment with strategic objectives and sustainability goals.

Empowering employees through continuous learning:

- offer ambitious onboarding and initial training programs to equip new hires with the skills and knowledge needed to succeed;
- promote lifelong learning by providing tools and resources to ensure employees remain agile in an ever-evolving world;
- provide accessible and innovative learning opportunities tailored to individual needs and career stages.

Supporting internal mobility and career growth:

- facilitate career evolutions and transitions through structured internal and geographical mobility programs, with dedicated platforms and pathways through annual reviews;
- encourage participation in initiatives such as apprenticeships, professional training contracts, and internal certification;
- strengthen employability by creating opportunities for employees to diversify their skills and explore new roles, ultimately;
- develop training programs designed to prepare managers for their critical role in driving team success;
- equip managers with tools and resources to mentor and guide their teams effectively;
- recognize and promote talent internally to foster a pipeline of future leaders.

This policy is overseen with progress tracked through key performance indicators. Regular reviews and employee feedback will ensure the policy remains effective and aligned with business needs.

Employees are encouraged to take ownership of their learning and career development, while managers play a critical role in fostering a culture of growth and identifying departments' needs.

Fair employment and working conditions

The iliad Group is committed to complying with local laws and ensuring fair and responsible working conditions. 92% of our workforce is on permanent contracts, reflecting the Group's commitment to stability and long-term relationships with our employees. The iliad Group aims to maintain a minimum of 90% of workforce on permanent contracts. Recruitment processes are carefully managed, and permanent contracts are favored over fixed-term ones. Working hours, including overtime, are strictly regulated in accordance with local labor laws to help maintain a work-life balance. Wages meet or exceed statutory minimums, with a strong commitment to pay equity across roles and genders, supporting employee retention and long-term engagement.

Social dialogue and collective bargaining play a key role in iliad's operations, through active engagement with employee representatives and unions. The Company respects the right to freedom of association and ensures open and constructive communication.

iliad is subject to the GDPR (General Data Protection Regulation) and therefore strictly ensures the protection of its employees' personal data in compliance with applicable regulations (please refer to URD GDPR section for further details).

S1-2 - Processes for engaging with own workforce and workers' representatives about impacts

The iliad Group places strong emphasis on internal culture of innovation and responsiveness, based on principles like autonomy and agility, with a human-scale organization where every employee matters. This approach helps maintain an environment conducive to innovation, with high-quality relationships and strong employee engagement. Managing the impacts on employees and their engagement in the company's strategy is critical to avoid risks that could harm competitiveness and attractiveness. The iliad Group is committed to adhering to international standards, such as the UN Global Compact and ILO conventions, as embedded in the Group's Code of Ethics.

The iliad Group engages in regular social dialogue to maintain employee motivation, competitiveness, and brand image. Strengthening workforce engagement helps mitigate key HR risks, such as attractiveness, turnover and productivity loss.

The iliad Group uses several methods to engage employees and gather feedback:

- **employee representation on the Board of Directors**: Two employees sit on the Board, representing the interests of the workforce and ensuring that employee rights and working conditions are considered in the Company's strategic decisions. They also contribute to discussions on human resources management, compensation, and social policies;
- **regular Social Dialogue**: In France and Italy, all employees are covered by their respective national Collective Agreement for Telecommunications. In France, monthly meetings with employee representatives, notably through the Social and Economic Committee (CSE), allow for discussions and consultation on working conditions and organizational changes, including on our most material risks linked to the promotion of diversity and well-being.

  In Poland, Play collaborates with the Solidarity Trade Union through an Agreement on Mutual Relations, ensuring regular consultations on employee protection, work regulations, and remuneration policies. While no collective agreement exists, quarterly meetings facilitate dialogue. Trade unions are also kept informed about occupational health and safety plans.

  This robust social dialogue ensures that workers' representatives are actively consulted in decision-making processes and can voice workforce perspectives on key matters;
- **collective agreements**: All employees in France and Italy are covered by formal collective bargaining agreements relating to working conditions, some of which were signed recently. The Group's commitment to robust social dialogue is notably evidenced by the signature in France in 2024 of the annual mandatory collective agreements addressing salaries and working conditions, on all French legal entities. At the end of 2024, the following agreements were still valid on the majority of our French legal entities: Equal Pay and Quality of Life at Work Agreement; Social Dialogue and Trade Union Rights Agreement; Amendment to Savings Agreement; Working Time Agreement; Agreement on Employment and Integration of Workers with Disabilities;
- **Direct Communication Channels**: iliad uses intranet along with internal social networks, newsletters, webinars, and Q&A sessions to maintain continuous dialogue with employees across its entities in France, Italy, Poland, and Morocco;
- **annual surveys**: Anonymous surveys are conducted annually with all employees across all our geographies. They focus on questions related to topics such as job interest, health and safety, work-life balance, pride in belonging to the group, or compensation. iliad records high participation rates on those annual surveys. In 2024, these participation rates were:
  - 65% in France and Morocco which share the same survey *Free Voice* (i.e. more than 8,000 responses),
  - 99% in Italy (i.e. more than 900 responses),
  - 81% in Poland (ie. more than 3,100 responses).

  The group aims for at least a 50% response rate in its annual employee satisfaction survey.

  These surveys help gauge the organizational climate and guide priority follow-up actions at both team and company levels. For example, in France and Morocco, results from the 2022 survey led to a project focused on improving work tools and co-working methods;
- **continuous improvement**: Local HR teams directly engage with groups of workers in the continuous improvement of working conditions and business practices. For example, our gender equality roadmap includes the organization of working groups and team chats on gender equality issues, to engage employees in the continuous improvement of our policies.

Responsibilities are shared among different levels of the organization:

- **Human Resources**: The local HR departments are responsible for implementing employee engagement initiatives and ensuring compliance with local regulations;
- **Employee Representatives**: In France, employee representatives actively contribute through the CSE and other formal structures, voicing employees' concerns and influencing decisions;
- **CSR Committee**: This committee, led by the CEO and the Chief Sustainability Officer (CSO) of the Group, ensures that employee engagement strategies align with the Company's broader sustainability goals;
- **Audits and Compliance**: The Risk, Audit, and Compliance department oversees ethical governance and engagement processes with employees.

Metrics on social dialogue and collective agreements are listed in section "S1-8 – Collective bargaining and social dialogue".

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

The iliad Group aims to ensure that employees have a voice regarding their working conditions through various channels and mechanisms. The Group is committed to fostering a transparent and ethically driven workplace culture, addressing material negative impacts through established policies, grievance mechanisms, and remediation actions.

Whistle-blowing system

The iliad Group has a whistle-blowing system in place for employees to confidentially report any behaviour that violates the company's Code of Ethics, including harassment and discrimination. This system is not only for employees but also for external partners. The whistle-blowing system was updated in 2022, in accordance with France's Waserman Act on the protection of whistle-blowers and includes a dedicated website and a video explaining how it works. The follow-up procedures for reports are designed to ensure that investigations into incidents are conducted promptly, independently, and objectively.

The Company actively communicates on ethics and compliance matters through a dedicated section on its website and intranet, offering constant access to ethics policies and procedures. Furthermore, employees regularly receive training on topics such as personal data protection. This communication and training aim to inform and raise awareness among employees about ethical standards, as well as the avenues available for HR-related issues.

For more information, please visit "G1-1 Business conduct policies and corporate culture".

Raising concerns on working conditions

In France, employees can raise concerns related to health, safety, and working conditions with members of the CSSCT (Health, Safety, and Working Conditions Committees). Safety officers have been appointed within several technical entities to act as relays in the field for health and safety teams and to take quick action in dangerous situations. Similarly, in Italy, Workers' Safety Representatives (RLS) are elected to oversee workplace health and safety, ensuring employee well-being through risk assessment, preventive measures, and collaboration on safety plans. These structures and assessments act as mechanisms for reporting issues related to workplace safety and health.

In France, employees in retail shops who are the most exposed to the risk of conflicts with customers have access to a dedicated online form entitled "Incident sheet", part of the procedure on incident management and placed under the workplace wellbeing team's supervision. For each incident reported through this channel, the workplace wellbeing team handles the report to support the impacted employee, assist its team, and implement actions if necessary.

Remediation plans

In the event of an alert, internal investigations are carried out into HR or ethics-related matters, leading to appropriate actions such as sanctions, training, process and organizational improvements, or tool enhancements. Depending on the issue, actions are managed by the Ethics & Compliance, HR, or HSE (Health, Safety and Environment) teams. Individual support, including psychological assistance, is also available when needed.

S1-4 - Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions

Actions towards Diversity, Equity & Inclusion (DE&I)

Inclusive recruitment and diversity networks

Recruitment practices are the foundation of any strategy aimed at promoting DE&I. Managers receive training and tools to ensure recruitment criteria remain objective, eliminating biases related to age, social background, or other personal factors, and focusing solely on skills and ability. Webinars and training sessions help raise awareness of unconscious bias and equip managers with tools for inclusive communication. Additionally, training on sexual harassment prevention and diversity is integrated into employee onboarding and management development programs across all countries of operation.

In France, a new Employer Branding campaign was launched in 2024 to highlight career opportunities, company values, and the benefits of working at Free. As part of this initiative, a recruiting kit was introduced to support managers with key insights on effective hiring. This guide provides essential guidelines to mitigate bias, such as using neutral job descriptions, clearly defining job requirements, conducting structured interviews, and training interviewers. Other inclusive recruitment practices include video and CV-less interviews tested in Paris region shops and a partnership with the Mozaïk Foundation to source talent from disadvantaged backgrounds. In Poland, Play introduced mandatory training on anti-mobbing, anti-discrimination, and stereotypes for managers in 2024. This program will expand to all employees in 2025, alongside the integration of the anti-mobbing policy into the onboarding process. Furthermore, in Poland representatives across business were involved to work on Play EVP (Employee Value Proposition) which is about inclusive company culture and value. Similarly to France, these messages will be part of the employer branding activities – internal and external. To strengthen efforts, Polish recruiters have completed training on inclusive hiring practice and the teams cares about job descriptions to be inclusive, ensuring that every role description encourages applications from women and is free from bias.

The Group supports employee engagement in diversity and inclusion topics by fostering internal networks. These initiatives strengthen inclusion and create a more equitable workplace. Founded in 2023, *iliad'elles* is the iliad Group's women's network in France, dedicated to gender diversity and inclusion. It aims to increase female representation in technical roles, support career progression, and challenge workplace stereotypes. Led by volunteers, it is open to all women in the Group. A similar network already exists in Poland. Following the same model, an internal network dedicated to LGBTQIA+ inclusion was established under iliad Pride in 2024.

Advancing gender equality in technical and leadership roles

The Group has implemented group-wide and local initiatives actively promoting the feminization of technical and leadership roles in historically male-dominated professions through fair evaluation, promotion, and compensation processes. Over the years, the numerous actions implemented seem to pay off as our Gender Equality Index (a mandatory index in France aiming to assess gender gaps) score of 94/100 in 2024 is both a high and increasing compared to 2023 (90/100).

In France, the Group is focused on integrating women into technical professions, particularly following the insourcing of its fiber and mobile network deployments, which led to the hiring of numerous technicians – a traditionally male-dominated field.

In France and Morocco, the month of March was dedicated to raising awareness on gender equality challenges and actions the Group is conducting, with the following actions:

- a new video series was launched, called "Inspirantes", highlighting the career journeys of female employees at iliad. Their stories showcase that regardless of gender, education, or background, anyone can build a successful career – especially at Free – the iliad Group;
- 20 recruiters from 7 entities joined forces for the first-ever "Women in Tech" Sourcathon, leading to the sourcing of more than 150 female tech profiles;
- french subsidiaries also organized "Equality Cafés"— dedicated discussions between managers and their teams on gender equality topics;
- a conference accessible for all employees aimed at presenting the inspiring path of Sarah Ouramoune, a French Olympic boxer who addressed the challenges of being a woman in a "men's world";
- an e-learning on sexism has been rolled to all employees in France and Morocco to raise awareness on sexism and unconscious bias. It was attended by 4,400 employees. A questionnaire has been sent to some of the employees who passed the e-learning to understand how we can improve these training actions. This will lead in 2025 to the launch of a new e-learning module on sexism, tailored to our organization's needs and challenges;
- during this month, employees could also participate in live workshops on "how to react to sexism", giving them the tools to be advocates of our zero-tolerance policy regarding discrimination.

A dedicated program to recruit women for our technical jobs has also been launched, in a partnership with "France Travail". In Poland, key initiatives were conducted in 2024, including a Gender Equality panel at Mercer/Mash, the Power to Women Conference, partnerships with Strong Women in IT and Women in Tech, and collaboration with Campus 42 where women were invited to develop their technical skills through the "Piscine" program.

Promoting disability inclusion in the workplace

In France, iliad has implemented a disability inclusion strategy, with company agreements, charters, and specific measures managed locally and adapted to different roles and activities to create a welcoming environment for employees with disabilities. All subsidiaries in France have put in place ergonomic workstations, such as ergonomic chairs, sit-stand platforms, and various useful accessories. It includes for example: a replication at home to facilitate remote work, along with awareness-raising or training programmes on disability-related challenges.

In each subsidiary, a disability referent within HR teams is in charge of promoting a culture of inclusion, raise employee awareness on disability issues, participate in meetings with employees with disabilities to ensure their well-being, and assess necessary workplace adjustments.

Every year, iliad organizes a range of events in the frame of the European Week for the Employment of People with Disabilities organized by several stakeholders, including non-profit organizations. In 2024, iliad involved its employees in multiple awareness-raising activities and participated in DuoDay, a nationwide event in France where a jobseeker with a disability pair with a volunteer employee for a day to explore a profession and gain workplace experience.

In Italy, all the new iliad Italia stores have been equipped with an access platform for people with reduced mobility, to make the premises accessible to all employees and subscribers.

Actions towards a safer, healthier, and more engaged workplace

Preventing risks and promoting employee well-being

The iliad Group's HSE (Health, Safety and Environment) teams ensure employee safety and well-being by implementing policies, identifying risks, and providing protective equipment. They enhance working conditions, offer specialized training, and collaborate with healthcare professionals to support physical and mental health. Regular audits, incident management, and awareness initiatives help maintain safety standards, particularly in high-risk areas like retail.

Occupational health doctors work alongside HSE teams to assess risks, prevent accidents, and improve workplace conditions, contributing to overall well-being and continuous workplace improvement. Their expertise helps prevent accidents, adapt workstations, and promote well-being.

The iliad Group strives to provide a comfortable and safe working environment by offering ergonomic accessories to prevent back pain, equipping field employees with protective gear and automatic transmission vehicles, and renovating sites to enhance workplace conditions, including relaxation areas.

To support work-life balance, a collective agreement introduced in early 2025 in France allows employees to save up to 10 days of paid leave per year through a Time Savings Account. Additionally, iliad's French leave policy includes 25 paid leave days annually, with extra days based on seniority and special leave for family or personal events.

The Group is committed to employee well-being through comprehensive health and welfare benefits, including supplementary health insurance, financial support in case of disability or death, and employer-covered health insurance contributions for employees and their children.

Employees are represented in health and safety committees, which work on preventing occupational risks and ensuring compliance through inspections and policy consultations. In France, the "*Document Unique d'Évaluation des Risques Professionnels*" (DUERP), or occupational health risk assessment report, is updated annually to adapt working conditions and prevent hazards through dedicated action plans. Metrics on health & safety training are listed in section "S1-14 – Health and safety metrics".

Risk mitigation through training, monitoring, and employee support

Training & risk awareness

The iliad Group provides mandatory training to ensure a secure workplace, for employees in high-risk positions. A network of safety officers anticipates risks, raises awareness, and takes rapid action in dangerous situations. Employees receive job-specific health and safety training, including fire evacuation drills, managing incivility, conflict resolution, and first aid. In Italy, the subsidiary renewed its ISO 45001 certification for health and safety management in 2022 for the following activities: provision of installation, commissioning (network integration) and maintenance of electronic devices for telecommunication plants for mobile and fixed networks; covering risk assessment, safety training, and internal procedures.

Incident management and safety monitoring

The iliad Group conducts site audits and closely tracks key health and safety performance indicators, such as absenteeism, occupational accidents, and severity rates. In retail locations, incidents involving altercations with visitors or subscribers are monitored weekly, with monthly reports for management and quarterly and annual reviews to develop targeted action plans. A specific procedure for reporting and managing conflicts is in place for retail employees facing customer conflicts. In Poland, Play enforces strict workplace safety regulations, mandatory training, preventive health screenings, and well-being initiatives, to foster a strong safety culture.

Employee support

The iliad Group provides well-being support through various initiatives. In France, employees have 24/7 access to a confidential assistance program via Workplace Options, covering emotional and practical well-being. In Poland, they benefit from the Mindgram platform, expert medical consultations, and health initiatives, while in Italy, psychotherapy programs are available, with a physical well-being partnership set to launch in 2025.

Metrics on health & safety training are listed in section "S1-14 – Health and safety metrics".

Actions towards skills development and learning

Onboarding and training for smooth integration

At iliad, we are committed to enhancing employability by investing heavily in onboarding and training to ensure a smooth transition for new employees. Our recruitment is skills-based rather than degree-driven, allowing us to attract diverse talent and develop expertise internally. Great emphasis is put on hiring and training young people, individuals with few or no qualifications, and those facing difficulties finding employment. Given the tight labor market and increasing skills shortages, we have designed comprehensive, hands-on induction programs tailored to each role, particularly for frontline employees such as those in retail, field operations, and customer service. These programs are led by experienced trainers who bring real-world expertise, equipping new hires with the practical skills they need to be operational quickly.

Integration training is customized for each subsidiary, incorporating mentorship, corporate culture sessions, and best practices to foster a strong sense of belonging. Certain mandatory training programs cover cybersecurity, GDPR, and workplace safety, ensuring all employees meet compliance and security standards. These courses are delivered either by internal trainers or through e-learning platforms, providing a flexible and efficient learning experience.

Additionally, we host a monthly Welcome Day in France, a bi-monthly session in Italy and bi-weekly in Poland, providing new employees with an introduction to the Group's history and business activities, as well as an opportunity to engage with senior management. Through these initiatives, iliad reinforces its long-term commitment to building, upskilling, and empowering its workforce for sustainable growth.

Empowering teams through training and career growth

Training for evolving skills and career growth

The Group emphasizes the need for training in both existing and emerging business areas to meet customer needs and adapt to market shifts, including nationwide fiber expansion.

All employees receive training to develop functional skills relevant to their roles, including new internal processes, job-specific technological advancements, customer service, and cross-selling. Mandatory regulatory training covers areas such as health and safety, cybersecurity, anti-corruption and GDPR (General Data Protection Regulation). To support career progression, additional training modules are offered in areas like change management and communication skills. In France and Morocco, the Voltaire Project helps employees improve their written French. In Poland, Skill&Play, a re-skilling program launched in 2024, helped employees develop analytical skills for future career transitions. Managerial training programs are deployed to harmonize management practices and train new leaders, including on annual appraisals and DE&I.

Strengthening career development through appraisals

In 2024, French and Moroccan entities rolled out a new action plan to conduct individual appraisal meetings and talent reviews, with a new dedicated tool and process. The goal of the appraisal is to assess skills and objectives, review assignments and targets, discuss career aspirations and training needs.

In Italy, efforts initiated in 2023 have been rolled out in 2024 to standardize the skills appraisal process for field service teams, ensuring best practices, clear objectives, and training needs identification. Workshops helped employees develop their own skills plans, set career goals, and improve feedback collection. Additionally, managers received training to better support team members in their career growth.

In Poland, there are dedicated development programs for employees in the sales and customer service network, offering clear career growth paths. Additionally, office employees participate in a well-established annual appraisal process that has been in place for years. In 2024, the Play team introduced a new process & online tool to conduct a company-wide talent review beginning 2025, ensuring comprehensive assessment and development opportunities across the organization.

Corporate universities fostering continuous learning

iliad has established corporate universities in different regions, each with its own model but sharing the goal of equipping employees for their future. In France, Université F233 focuses on continuous training, apprenticeships, and certification programs. In Italy, iliad College is an 8-week blended training program dedicated to our sales professionals. It is focused on advanced sales skills combined to a deep dive into customer experience and telecommunication technologies. The program welcomes participants from outside iliad to share our competencies and user-centric approach with everyone, putting the values of transparency into practice. In Poland, the Technology Academy explores the convergence of TV, fiber, and mobile services, with a focus on AI and future technologies. These universities provide continuous learning, career development, and promote the Company's values while ensuring long-term employability.

Supporting career growth through internal mobility

Internal mobility is seen as vital for retention and career building.

To support mobility, all employees in France and Morocco can connect to the platform "iliad Up Mobility". This internal tool facilitates career development by displaying open positions, giving the keys to employees to candidate to internal mobility opportunities. Specific communication on internal mobility is also conducted on a regular basis, presenting employees' testimonies.

In Poland, employees can take part in the Talent Boost program, designed to promote internal mobility and support internal candidates. If an employee shows strong potential for a particular role but requires specific skills - such as technical expertise - the program provides the necessary support to help them grow and succeed.

Fair and performance-based compensation

The iliad Group's compensation policy focuses on fair and performance-based rewards while ensuring gender neutrality in salaries and career opportunities. Compensation takes account of inflation adjustments. Employees benefit from share ownership plans, variable pay mechanisms, and a profit-sharing agreement, alongside comprehensive health and life insurance coverage. In 2024, the iliad Group launched Up2Bond, an employee investment program available in France, Poland, and Italy. This initiative allowed employees to invest in iliad bonds under preferential conditions, with the Company committing to a 300% matching contribution, capped at €600 gross. By the end of the campaign, 47% of eligible employees had subscribed to the offer. By offering equitable and attractive compensation, iliad strengthens employee retention and long-term engagement, fostering a committed and motivated workforce.

Metrics on Talent & Learning are listed in section "S1-13 – Training and skills development metrics".

Metrics and targets

S1-5 - Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

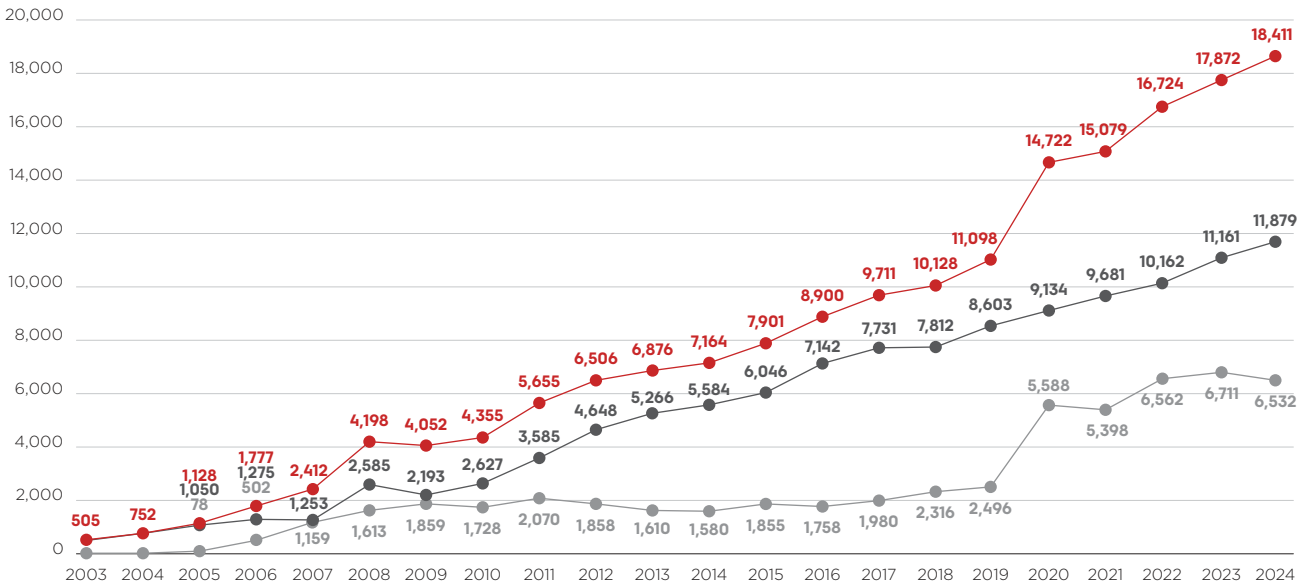
Health, Safety and Wellbeing	The iliad Group aims to maintain zero fatalities as result of work-related injuries or work-related illness. *Metrics on health & safety training are listed in section "S1-14 – Health and safety metrics".*
Diversity, Equity and Inclusion	The iliad Group aims to increase the proportion of women in our recruitments from 34% in 2021 to 40% by 2030. *Metrics on DE&I are listed in sections "S1-9 – Diversity metrics" and "S1-12– Persons with disabilities"*
Talent Development and Learning	The iliad Group aims to reach by 2028 a share of 90% of employees that participated in a regular performance and/or career development review within the year. The iliad Group aims to maintain a minimum average of 24hrs of training per employee. *Metrics on Talent & Learning are listed in section "S1-13 – Training and skills development metrics"*
Working conditions	The iliad Group aims to maintain a minimum of 90% of workforce on permanent contracts. *Metrics on Working conditions are listed in the section "S1-6 – Characteristics of the undertaking's employees", "S1-10 – Adequate wages"*
Employee engagement	The iliad Group aims to maintain a minimum participation rate to annual surveys of 50%. *Metrics on Employee engagement are listed in the section "S1-2 – Processes for engaging with own workforce and workers' representatives about impacts"*

S1-6 - Characteristics of the undertaking's employees

The iliad Group's workforce consisted of 18,411 employees globally at the end of the reporting period. During the reporting period, iliad expanded by creating 539 jobs, mainly through organic growth. The sharp increase of our workforce between 2020 and 2022 was led by the respective acquisitions of our subsidiaries Play and UPC in Poland.

	At Dec. 31, 2022	At Dec. 31, 2023[a]	At Dec. 31, 2024[a]
Number of employees based in France	10,162	11,161	11,879
Number of employees based outside France	6,562	6,711	6,532
o/w Italy	*812*	*1,043*	*1,126*
o/w Morocco	*1,478*	*1,459*	*1,334*
o/w Poland	*4,272*	*4,209*	*4,072*
Total workforce	**16,724**	**17,872**	**18,411**

- **Evolution of workforce by geographical area since 2003**



- **Breakdown of workforce by country and by gender**

iliad's gender breakdown includes 12,768 men (69%) and 5,643 women (31%).

Over 11,800 employees are based in France, with additional workforce presence in Italy, Poland and Morocco.

Headcounts at Dec 31, 2024	Headcount	Percentage
France	**11,879**	**65%**
Female	2,850	24%
Male	9,029	76%
Poland	**4,072**	**22%**
Female	1,788	44%
Male	2,284	56%
Italy	**1,126**	**6%**
Female	364	32%
Male	762	68%
Morocco	**1,334**	**7%**
Female	641	48%
Male	693	52%
Total	**18,411**	**100%**
Female	5,643	31%
Male	12,768	69%

- **Breakdown of workforce by contract type and by gender**

By the end of 2024, 92% of iliad's employees held permanent contracts. Temporary contracts are utilized for project-specific needs or hiring strategies.

The Company employs 98% of full-time staff, with part-time roles negotiable to meet operational needs or personal wishes from employees.

At Dec 31, 2024	Headcount	Percentage
Permanent	**17,002**	**92%**
Female	5,034	30%
Male	11,968	70%
Temporary	**1,409**	**8%**
Female	609	43%
Male	800	57%
Full-time	**18,073**	**98%**
Female	5,460	30%
Male	12,613	70%
Part-Time	**338**	**2%**
Female	183	54%
Male	155	46%
Total	**18,411**	**100%**

At Dec 31, 2024	France	Poland	Italy	Morocco	Total
Permanent	11,440	3,182	1,050	1,330	17,002
Temporary	439	890	76	4	1,409
Full-time	11,684	3,986	1,069	694	18,073
Part-time	195	86	57	640	338

Number of recruitments, departures and turnover

In 2024, a total of 3,118 employees left the Company. The employee turnover rate stood at 14.69% at Group level, considering only employees under permanent contracts.

Within the reporting year, the iliad Group has recruited more than 3,900 new employees. Within those recruitments, 67% were on a permanent contract.

Methodology

The iliad Group uses transparent methodologies for compiling employee data, aligning with established reporting standards. Employee data is measured based on head count, representing the total number of employed individuals. Data is captured at the end of the reporting period.

S1-8 – Collective bargaining coverage and social dialogue

In 2024, 71% of iliad's overall workforce was covered by a collective bargaining agreement.

EEA Countries	Collective baraining coverage Percentage of employees covered by collective bargaining agreements *At Dec 31, 2024*	Social dialogue coverage Percentage of employees covered by workers' representatives *At Dec 31, 2024*
France	100%	100%
Italy	99%	99%
Poland	0%	100%

While Polish employees are not covered by collective bargaining agreements due to the national legislation, 100% of employees are covered by employee representatives as Play collaborates with the Solidarity Trade Union.

Although our employees in Morocco are not formally covered by employee representatives, various systems do exist to engage with them, such as our whistle-blowing system or our annual social barometer "*Free Voice*".

In France, across our legal entities, 266 meetings with the "Comité Social et Économique" were held in 2024 and reached 24 agreements with employee representatives in the same year.

The iliad Group is considering setting up a European Works Council to improve cross-regional dialogue. However, no formal establishment or agreement has been made so far.

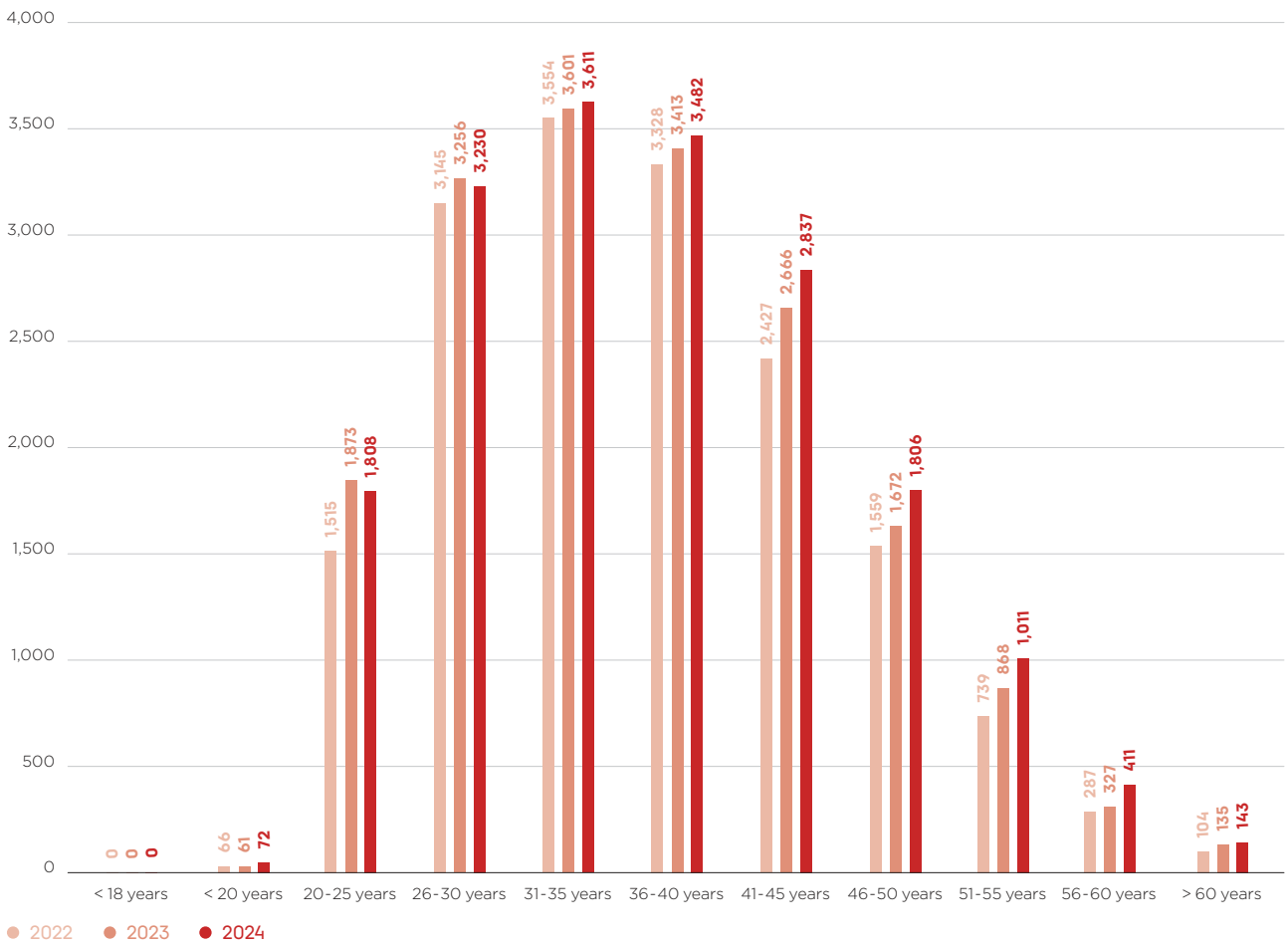
S1-9 – Diversity metrics

Talents from all backgrounds

iliad's Group is promoting a culture of inclusion and diversity, with motivation and personality being the priorities for recruitment. As a result, our workforce is exceptionally diverse, made up of 88 different nationalities. This wide variety of backgrounds, outlooks and experience enriches our working environment by stimulating creativity and innovation.

Age distribution

The Group is vigilant on having a balanced age distribution, to ensure we employ both young and experimented talents. In 2024, 24% of the workforce is aged under 30 years old, 66% is aged between 30 and 50 years old, and 10% is aged over 50 years old.



Gender Distribution

Within the Group, 35% of Top Management positions are held by women.

Top Management is composed of both leadership at Group level (i.e. Group's CEO and its direct reports), and at country level (i.e., countries' CEOs and/or senior leadership and their direct reports).

At Dec 31, 2024	Headcount	Percentage
Female	18	35%
Male	34	65%
Total	**52**	**100%**

The iliad Group aims to increase the proportion of women in our recruitments from 34.4% in 2024 to 40% by 2030.

Focus on the french Gender Equality index

The iliad Group achieved an overall score of 94/100 for its 2024 gender equality index, encompassing all its activities in France. This high score confirms the Group's solid gender equality policy.

	UES iliad		Protelco		F-Distribution		UES MCRA		Scaleway		UES Free Pro		Predictiv Pro		Freebox		OPCORE		TOTAL CONSOLIDÉ	
Nb of employees at Dec. 31, 2024	5,168		2,251		1,619		1,313		551		497		98		64		69		11,743	
Nb of eligible employees	4,964		1,844		1,348		1,296		523		436		81		61		52		10,700	
2024	Actual score	Maximal potential score	Actual score	Maximal potential score	Actual score	Maximal potential score	Actual score	Maximal potential score	Actual score	Maximal potential score	Actual score	Maximal potential score	Actual score	Maximal potential score	Actual score	Maximal potential score	Actual score	Maximal potential score	Actual score	Maximal potential score
Gender pay gap *(%)*	36	40	39	40	39	40	39	40	34	40	39	40	29	40	19	40	NA	0	39	40
Gender gap for individual salary increases *(% points)*	20	20	20	20	20	20	20	20	10	20	10	20	35	35	35	35	25	35	20	20
Gender promotion gap *(% points)*	15	15	15	15	15	15	15	15	15	15	15	15	-	-	-	-	-	-	15	15
% of employees receiving salary increases on return form maternity leave	15	15	15	15	15	15	15	15	15	15	NA	0	NA	0	NA	0	NA	0	15	15
Number of women among the 10 highest earners	5	10	5	10	10	10	5	10	5	10	5	10	0	10	0	10	5	10	5	10
Total for the measurable indicators	91	100	94	100	99	100	94	100	79	100	69	85	64	85	54	85	30	45	-	-
INDEX SCORE (out of 100 points)	**91**	**100**	**94**	**100**	**99**	**100**	**94**	**100**	**79**	**100**	**81**	**100**	**75**	**100**	**64**	**100**	**NA**	**100**	**94**	**100**
Year-on-year change (2023-2024)	5↗		0↗		0↗		0↗		2↘		5↘		5↗		15↘				4↗	

S1-10 – Adequate wages

100% of Free employees receive at least the legal minimum wage. Salaries in France are reviewed annually to ensure compliance with local living wage standards and legal minimum wage (SMIC). Any discrepancies identified are adjusted in the next remuneration cycle.

S1-11 – Social protection

100% of iliad employees are based in countries that guarantee a level of social protection covering health, unemployment, disability, parental leave, and retirement, in accordance with applicable local laws.

S1-12 – Persons with disabilities

The number of employees with disabilities within the Group's workforce has increased from 2.6% in 2022, to 2.9% in 2023 and 3% in 2024.

In France, disability status is recognized through the Recognition of the Status of Disabled Worker (RQTH), issued by the Departmental House for Disabled Persons, granting access to workplace accommodations, financial support, and inclusion programs.

In Italy, employees fall under a protected category system (disabili art.1) and must complete an administrative process involving INPS (Instituto Nazionale della Previdenza Sociale) and provincial employment offices. Employees recognized as persons with disabilities benefit from tailored workplace accommodations, extended access to remote working arrangements, and additional leave entitlements.

In Poland, employees must provide a formal disability certificate, as defined by law, to access benefits, workplace adjustments, and entitlements.

In Morocco, disability is assessed through supplementary insurance coverage. Employees submit a medical file, reviewed by an occupational physician and the insurance company, to receive incapacity benefits and workplace accommodations.

S1-13 – Training and skills development metrics

In 2024, the iliad Group provided 623,146 hours of training. Within the reporting year 18,092 employees attended at least one training session, including employees who have left the Groupe since.

The sharp increase in training hours in 2023, was driven by the expansion of our stores and Free Proxi teams in France requiring extensive onboarding, the renewal of safety authorizations, skill adaptation plans in contact centers, and enhanced training for versatility and cross-selling in customer relations.

	Annual Training hours			Average monthly headcount			Annual Training hours/ average monthly headcount		
	2022	2023	2024	2022	2023	2024	2022	2023	2024
Group	535,776	752,314	623,146	16,488	17,724	18,296	32	42	34
o/w France	362,125	515,944	404,218	9,876	10,727	11,604	37	48	35
o/w outside of France	173,651	236,370	218,927	6,611	6,997	6,692	26	34	33

Breakdown of average training hours per country and per gender

The iliad Group aims to maintain a minimum average of 24 hours of training per employee. The following table provides the breakdown of iliad's employee training hours by gender and country as of December 31, 2024:

At Dec 31, 2024	France	Italy	Poland	Morocco
Female	38	29	26	55
Male	34	30	26	55
Total	**35**	**29**	**26**	**55**

Internal mobility and promotion

The iliad Group considers internal mobility as a vital process for retention and career building. In 2024, 156 employees moved jobs between different Group entities, accounting for 4% of hires. Additionally, 1,100 employees were promoted within the Group in 2024, including 125 to executive positions.

Employees that participated in regular performance and career development reviews

The iliad Group aims to reach by 2028 a share of 90% of employees that participated in a regular performance and/or career development review within the year. The table below shows the distribution of employees who participated in these reviews:

At Dec 31, 2024	Headcount	Percentage
Female	2,605	46%
Male	2,826	22%
Total	**5,431**	**29%**

S1-14 – Health and safety metrics

In 2024, the Group provided 79,377 hours of health and safety training towards 9,353 employees.

100% of Group employees are represented in health and safety committees, which work on preventing occupational risks and ensuring compliance through inspections and policy consultations. In France, 45 Health and Safety commission (CSSCT) meetings were held in 2024 between HR teams and worker's representatives.

99.99% of employees are covered by health and safety management system based on legal requirements and/or recognized standards or guidelines.

In 2024, the iliad Group accounted 0 fatalities as result of work-related injuries and work-related ill health, both regarding own workforce or other workers working on iliad's sites.

During the reporting year, the iliad Group recorded 553 work-related accidents.

The Group monitors the frequency and severity rates of occupational accidents in all of its entities. Overall, the accident frequency rate decreased in France, but slightly increased for the Group.

Frequency & Severity Rates for the Group and France	2022	2023	2024
Frequency rate – Group	5.90	8.02	8.18
Frequency rate – France	12.95	12.41	10.77
Severity rate – France	0.85	0.74	0.87

S1-15 – Work-life balance metrics

100% of iliad employees are based in countries that guarantee a level of social protection ensuring the right to family-related leave, in accordance with applicable local laws. Therefore, all employees are entitled to family-related leave.

- **Percentage of entitled employees that took family-related leave**

	France	Italy	Poland	Morocco
Female	33%	16%	32%	26%
Male	31%	14%	19%	27%
Total	**32%**	**15%**	**25%**	**27%**

S1-16 – Remuneration metrics

In 2024, the unadjusted gender pay gap between male and female employees at Group level stood at 14.8%. This indicator is calculated as the difference in average pay levels between female and male employees, expressed as a percentage of the average male pay. To ensure more accurate internal monitoring, we use an adjusted methodology based on the French gender equality index. According to this methodology, Free achieved a score of -0.1% in France (1.90% with unadjusted methodology), reflecting the Company's ongoing efforts to promote professional equality and high score at Gender Equality Index. We acknowledge that results are slightly less favorable in Italy (5.3%) and in Poland (11.2%, adjusted method), which can be largely attributed to demographic factors and the organizational structure - specifically, the overrepresentation of women in administrative roles, and a lower proportion of women in senior and technical positions. We are committed to reducing the gender pay gap in the coming years by among other things working to improve female representation in technical and leadership roles.

In 2024, the annual total remuneration ratio of the highest paid individual to the median annual total remuneration for all employees (excluding highest-paid individual) is 37.

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

In 2024, 57 incidents or complaints were filed by our workforce through our whistle-blowing channel. Among these reports, 20 were designated as cases of harassment and/or discrimination by the reporting parties, 3 of which were admissible according to the whistleblowing criteria. None led to confirmed cases of discrimination and/or cases of harassment. 4 reports are still under investigation.

No fines, penalties, or compensation for damages have been made in connection with the aforementioned incidents and complaints. Zero severe human rights incidents involving our own workforce were reported in 2024.

4.7 S2 – Workers in the value chain

The iliad Group recognizes the critical role of value chain workers in ensuring the resilience and sustainability of its operations. As part of its responsible business approach, iliad is committed to addressing material impacts on these workers to ensure ethical labor conditions across its supply chain.

This section outlines how the Group integrates value chain workforce considerations into its business strategy, focusing on:

- **Strategy**: Aligning the management of material IROs related to value chain workers with iliad's broader business strategy;
- **Impact, Risk, and Opportunity Management**: Implementing policies and processes to engage with value chain workers, remediate negative impacts, and manage associated risks and opportunities;
- **Metrics and Targets**: Defining key indicators and objectives to track progress.

iliad's approach consists of an analysis which addresses the following identified impacts:

ID	IRO type	IROs	VC location	Time horizon
12	Negative Impact	Exposure to hazardous working conditions in iliad's supply chain, leading to workplace accidents and health issues.	Upstream	Short term
13	Negative Impact	Barriers to fair wages and unionization, restricting workers' rights and reducing fair compensation.	Upstream	Medium term

Strategy

S2.SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

When considering workers in iliad's value chain, it is important to understand our unique operational structure. iliad has strategically chosen to internalize key activities such as product design and operates primarily in a service industry without direct contact with raw material providers. This distinctive positioning was thoroughly documented during our comprehensive double materiality assessment, which incorporated extensive feedback through interviews and surveys with dozens of providers and key industry players.

Nevertheless, iliad recognizes that the well-being of both our internal staff and the personnel of our external providers remains fundamentally important to our Company values and the industry. Despite our in-house approach, we have made the decision to publish relevant data required by ESRS, demonstrating our commitment to transparency and responsible business practices.

The iliad Group is also committed to upholding labor rights across its supply chain and remains attentive to industry-wide risks related to working conditions in the telecom sector. Suppliers are selected for review based on an ethical and non-compliance risk map, combining criteria such as the supplier's industry, regional location and business volumes, as well as indices defined by non-governmental organizations NGOs (e.g. Transparency International's Corruption Perceptions Index). Within this framework, iliad remains vigilant regarding labor risks, ensuring alignment with its Partner Relations Charter, which among other things aims to mitigate risks related to child labor and forced labor.

Finally, it should be noted that the elements of S2 should be read in conjunction with G1, which partly addresses supplier-related issues.

Impact, risk and opportunity management

S2-1 – Policies related to the value chain workers

Partner Relations Charter

At iliad, we take great care to provide our subscribers with high-quality products and services. We also take into careful consideration the CSR performance of our partners and all the links in our supply chain.

In 2022, the Group published a Partner Relations Charter setting out the ethical, social, and environmental commitments that the iliad Group expects from its partners, suppliers, subcontractors, and service providers irrespective of location. This policy ensures compliance with national and international regulations while promoting responsible business practices. Partners are expected to ensure compliance with this charter across their internal and external operations.

Furthermore, the charter is overseen by the Group's Ethics & Compliance and Supplier Relations teams, ensuring adherence through compliance procedures.

In view of the identified IRO's, it shall be highlighted that our Partner Relations Charter states that all of our partners must:

- apply all the provisions relating to the elimination of child labor and the protection of children as defined in the ILO conventions;
- respect, in all circumstances, all nationally and internationally proclaimed human rights;
- uphold the principle of freedom of association and to protect the right to collective bargaining, including the right to form and join a trade union as provided for in the ILO conventions and national law;
- provide their employees with a safe working environment that is not harmful to their health. They must identify and assess any risks related to the work performed by their employees and do everything in their power to manage such risks and take the necessary precautionary measures;
- comply with national minimum wage legislation, regularly pay their employees their salaries, communicate clearly with employees about their remuneration packages and pay overtime at the statutory rates.

Procurement Policy

In 2024, iliad has started to work on a new Procurement Policy aimed at ensuring fair and transparent procurement practices across the Group. This policy relies on three key principles:

- contributing to the Group's performance, notably by ensuring a fair and responsible supplier selection process;
- reinforcing and protecting the Group's purchases through the integration of several stand-alone documents (Code of Conduct, Code of Ethics, Terms and Conditions...) and the screening of supply chain for risks and dependencies;
- driving the Group's CSR commitments by integrating sustainability from the onset of the procurement process. Sustainability criteria are included in the selection process on a case-by-case basis.

The goal is to finalize the validation if this policy with key entities of the Group in 2025.

Supplier policy

As part of our commitment to responsible and efficient supply chain management, iliad has implemented a **Group-wide Supplier Policy**, effective from April 1, 2025. This policy establishes a structured framework for onboarding and managing suppliers and service providers, ensuring compliance with ethical, environmental, and operational standards. It also serves as the foundation for the Supplier Platform (see below).

S2-2 and S2-3 – Processes for engaging with value chain workers about impacts and raise concerns

Through its Partner Relations Charter, iliad actively engages with value chain workers to address and mitigate social and environmental impacts. More specifically, iliad conducts visits to various suppliers, which involve, among other things, the use of compliance questionnaires.

Furthermore, the Group has a whistle-blowing system that all its partners can access allowing them to raise the alert about any potentially unethical situations, including violations of the rules and principles of this Charter. The system can be accessed at alerteethique.iliad.fr. For more information, please visit G1.

S2-4 – Taking action on material impacts on value chain workers

Supplier relationship management

Sharing common values is essential to building and maintaining lasting partnerships and business relations.

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

Procurement is considered to be sustainable when it respects our ethical principles outlined in the Partner Relations Charter aiming to minimize negative impacts on the environment, society or human rights that could result from the relationship with a supplier.

To minimize potential difficulties with its suppliers and strategic partners, the Group implements a range of measures:

- a system is in place to assess suppliers from the beginning of the business relationship and throughout the partnership;
- supplier portfolio is carefully managed to limit dependencies;
- multi-sourcing is developed wherever possible, while strategic partnerships are forged with suppliers for the most critical equipment;
- relevant markets are monitored to anticipate potential problems.

Supplier platform

To strengthen responsible supply chain management, iliad has launched a **Supplier Platform**, effective April 1, 2025. This centralized tool ensures a structured onboarding process and compliance verification before engaging in business relationships. Key features include:

- **mandatory registration** for all new suppliers and service providers;
- **risk-based compliance checks** to align with iliad's procurement policies;
- **pre-contract registration** to reinforce due diligence;
- **document requests** based on risk level.

To support suppliers, the platform provides **user manuals, training sessions, and a dedicated support system**. This initiative enhances transparency and accountability in iliad's supply chain.

Metrics and targets

S2-5 – Targets related to managing material impacts, risks and opportunities

In 2020, the Group developed an internal supplier management tool, enabling iliad to facilitate its relationships with its suppliers, verify that they comply with the Group's ethical principles and monitor their CSR performance. The Group's main results under the ESRS S2 standard are as follows:

- the iliad Group has set a target for **50% of expenses to be covered by EcoVadis assessments in 2025** and successfully exceeded this goal in 2024, reaching **52% coverage;**
- by the end of 2024, 811 suppliers had been assessed by EcoVadis;
- our average supplier score is 61/100 – exceeding the EcoVadis average by 14 points;
- as disclosed in section E1-4, the Group closely monitors the environmental actions implemented by its suppliers and those that have undertaken initiatives under the Science Based Targets initiative.

	France	Italy	Poland[a]	Total
% of 2024 expenses from suppliers assessed via EcoVadis	57%	77%	24%	52%

	2020	2021	2022	2023	2024
% of new suppliers and providers undertaking to respect our ethical principles	ND	100%	100%	100%	100%
% of assessed suppliers to have implemented an anti-corruption policy	ND	ND	77%	78.4%	85.6%

4.8 S3 – Affected communities

The iliad Group's strategic approach is rooted in the belief that digital technology is a powerful tool for empowerment, and that it should be equally accessible. The Group recognizes the importance of engaging with affected communities to understand and address the material impacts of its activities. As part of its commitment to sustainable business practices, iliad works to ensure that its operations create positive outcomes for local communities while addressing any potential negative impacts. This section outlines how iliad integrates community-related considerations into its business, focusing on:

- **Strategy**: Aligning community-related impacts, risks, and opportunities with iliad's business strategy, in line with stakeholder views and material risks;
- **Impact, Risk, and Opportunity Management**: Policies and processes for engaging with affected communities, addressing negative impacts, and managing material risks and opportunities;
- **Metrics and Targets**: Targets and key indicators to measure the management of material impacts on affected communities and the effectiveness of the actions taken.

The analysis will principally consider the steps taken to engage the following positive impact:

ID	IRO type	IROs	VC location	Time horizon
14	Positive impact	Access to telecommunication and digital services for underserved or vulnerable populations, including access to political information and engagement tools	Own Operations and Upstream Activities	Short term

Strategy

S3.SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

Since its inception, iliad has prioritized expanding its network in its geographies, ensuring comprehensive coverage, including for underserved areas.

This belief has taken shape on three strategic pillars:

- designing simple products and providing affordable offers for everyone;
- giving everyone, wherever they live, equal access to digital technologies and products through a policy of sustained investment in the rollout of equipment and infrastructure throughout the country;
- building an open and committed Company that supports digital inclusion and training for its employees and society as a whole.

In 2006, the Group embarked on a long and costly phase of investment in optical fiber-to-the-home (FTTH) in France. Free's fiber rollout and its pricing strategy demonstrate the operator's determination to offer equal access to digital technologies. While most of our competitors charge subscribers a higher price for a fiber connection, Free opted from the very outset to offer the same price regardless of the technology chosen by the subscriber and his address.

To expand fiber access, Free started investing in high-density areas in 2006, following ARCEP's regulatory framework, and has co-financed investments in the vertical network. The IFT "la fibre des territoires" joint venture with InfraVia, created in 2020, supports the strategy of providing equal access across the country, including outside densely populated areas. By 2024, iliad's network covered 99.9% of the population for 3G, 99.6% for 4G, and over 94% for 5G, ensuring broad access to high-quality mobile services, including in rural and remote areas.

Impact on affected communities

iliad's operations affect various communities both directly and indirectly through its value chain, products, services, and business relationships. To contribute to vulnerable and underserved communities by providing access to telecommunication and digital services, the scope of impact covers:

1. **Communities connected through iliad's infrastructure**: iliad's infrastructure (e.g., mobile masts, data centers, and retail locations) plays a key role in expanding digital connectivity, ensuring that underserved areas gain access to high-quality telecommunication services. These sites also create local jobs, fostering regional development and enhancing digital inclusion.
2. **Communities along the value chain**: By promoting ethical sourcing and fair labor practices, iliad helps ensure that the expansion of digital services does not come at the expense of workers' rights or community well-being.
3. **Communities at the endpoints of the value chain**: iliad's commitment to responsible sourcing and conscious waste management ensures that the benefits of digital expansion do not burden affected communities.
4. **Civil Society**: iliad engages with local communities to understand their unique needs and challenges, striving to maximize its positive impact, in particular through the Free Foundation. Recognizing that certain groups—particularly those in high-unemployment areas or with limited access to essential services—are more vulnerable, iliad invests in local job creation, educational initiatives, and strategic partnerships to foster inclusivity and ensure that no community is left behind in the digital transition.

Furthermore, although iliad does not directly operate in indigenous territories, we are committed to understanding potential future impacts if relevant.

Electromagnetic fields emitted by telecommunication equipment

The risks associated with certain stakeholders' apprehensions about the health impact of electromagnetic waves are specific to mobile activities. Wireless telecommunication equipment generates an electromagnetic field that travels through the environment in the form of waves. For 2024, based on current knowledge, the net criticality of these risks is considered to be low and non-material in our IRO analysis.

Since 2022, numerous scientific publications have concluded that, based on current knowledge, there are no health risks associated with 5G installations. Internationally recognized health authorities largely agree that there is no proven health risk for exposures that are below the exposure limits recommended by the International Commission for Non-Ionizing Radiation Protection (ICNIRP). These standards are based on scientific research, particularly research carried out by health authorities such as the World Health Organization (WHO). The Group strictly complies with all regulations adopted in this area by the public authorities.

However, it is a legitimate question to ask what the impact of exposure to these electromagnetic waves has on people's health. While the scientific community agrees that there is no health risk, the Group nonetheless has to deal with the fears expressed by public opinion and sometimes by local authorities, as well as the actions of certain activists opposed to the installation of mobile masts.

Despite this broad scientific consensus and the scrupulous application of the ICNIRP's technical recommendations, misgivings persist and can sometimes turn into hostility. Our teams constantly monitor the situation and engage in continuous and constructive dialog with local authorities. Transparency is our goal and to achieve it, we share uptodate information based on scientific data. iliad also holds internal seminars and participates in discussion forums at the European, national, regional and departmental levels.

Impact, risk and opportunity management

S3-1 – Policies related to affected communities

Overview of policies and regulations subject to material IROs

iliad's policies focus on expanding access to telecommunication and digital services for underserved and vulnerable populations, underpinned by our commitment to **Stable Pricing** and **Fair Pricing**. By keeping our mobile plans affordable, with a first Free Mobile plan, costing just €2 a month, iliad ensures that new technologies are accessible to everyone, regardless of income. These pricing principles are supported by a solid framework of ethical policies that guide our responsible business practices.

The table below outlines the key policies and principles that guide iliad's mission to have a positive impact on affected communities.

- **Major policies supporting access to telecommunication and digital services**

Stable pricing	Free has not increased the price of its mobile plans (€2 and €19.99) for 10 years. In January 2022, for Free Mobile's 10th anniversary, Free has pledged not to do so for the coming 5 years, until 2027.
Fair pricing	We defend the principle of paying a fair price for a phone package, to bring new technologies within everyone's reach. Our first Free Mobile plan, costing just €2 a month, illustrates this aim.
Code of Ethics	Promotes transparency, trust, accountability, and ethical behavior, ensuring compliance and fostering a positive organizational culture.
Anti-Corruption Code of Conduct	Establishes clear guidelines to prevent corruption and bribery, outlining the Anti-Corruption Plan and employee obligations for ethical conduct...
Partner Relations Charter	Guides interactions with partners to uphold ethical standards, supporting equitable service delivery.
Personal Data Security and cyber security	Ensures the protection of personal data, fostering trust among users, including vulnerable groups, in accessing digital services. For more information, please refer to S4.
Managing Conflicts of Interest	Provides guidelines to avoid conflicts of interest, and maintain trust with stakeholders, while ensuring that all communities receive unbiased and fair services.
Gifts & Hospitality Policy	Regulates the acceptance of gifts and hospitality to maintain integrity.

S3-2 and S3-3 – Processes to engage with affected communities and channels for affected communities to raise concerns

The iliad Group is dedicated to building trust with communities by engaging directly and through trusted partners. This includes addressing local concerns around network deployment, service accessibility, and digital inclusion. Through transparent communication, iliad promotes regional development and empowers underserved populations to access vital services. The Group's efforts are demonstrated in its ongoing engagement with communities in France, Poland, Italy and beyond.

Processes to engage with affected communities

The Group works hard to build up relations of trust with society at large. Engagement occurs both directly and through trusted intermediaries like non-profits, ensuring community needs are addressed. For example, we regularly talk to the press and post on social media, and we actively participate in public information meetings to discuss local issues (cf. ESRS 2 – SBM-2 Interests and views of stakeholders).

By fostering transparent and collaborative relationships, iliad strengthens its impact on **digital inclusion** and **regional development**, specifically by enhancing **access to telecommunication and digital services**. These services are vital for underserved or vulnerable populations, empowering them with the tools necessary to engage in **civic participation** and access **political information**.

In France, Free's regional commitment and engagement is reflected in the close relations our people build up with local players. A team specifically dedicated to relations with local authorities works nationwide in partnering the rollout of the Fixed and Mobile Ultra-Fast Broadband network. This team participates in seminars and public meetings to answer any concerns that local subscribers may have and ensure high-quality dialog, both with subscribers and local councilors. In 2024, approximately 1,000 meetings were held with local authorities, including public meetings, bilateral meetings (Free and elected officials), and multilateral meetings (operators and elected officials). Throughout the year Free's regional teams deal with questions from residents about various issues (such as the copper network shut-down, the health impact of electromagnetic fields and after-sales matters), providing prompt answers that consider specific local contexts. In Poland, Play engages in continuous dialog with local authorities and communities and organizes information campaigns among the main stakeholders of the Fixed and Mobile network rollout. For several years, Play has participated in many meetings with local governments and residents. In 2024 the Public Affairs Department at Play participated in about 100 of such meetings.

Beyond connectivity, iliad also engages with communities on environmental matters, including water resource management linked to data centers. As outlined in section E3, through collaboration with internal teams, external experts, and local groups, iliad monitors water use, improves sustainability practices, and addresses local environmental concerns.

Through **Free Foundation initiatives**, iliad creates dialogues with civil society through **local community projects**, reinforcing its social responsibility at the regional level. Partnerships with civil society, universities, and industry bodies (e.g., GSMA, UNGC, ADEME) promote digital inclusion and dialogue as well. In Poland, Play conducts many activities through Chambers and Associations, of which it is a member. Many initiatives in the field of telecommunications network development are conducted in educational activities field for local communities.

Channels for affected communities to raise concerns

The iliad Group's approach to remediation is based on its commitment to providing equitable access to telecommunications and digital services for underserved and vulnerable populations. As such iliad provides:

- **whistleblower mechanism** in line with France's Loi Sapin 2 to allow reporting of any violations of laws, threats to public interest, or breaches of the Group's Ethics Code and policies. An Ethics Committee examines each case and determines the appropriate course of action. For more information, please see G1;
- **customer service channels and community engagement initiatives** that allow individuals to communicate concerns.

S3-4 – Taking action on material impacts on affected communities

Our impact on communities around operating sites as a local player

Through initiatives like Free Proxi and its regional job creation efforts, the Group strengthens digital inclusion. As well as being a fast-growing telecommunication player on a European scale, the Group is also a local player with a strong regional presence in all of its geographies. Our commitment to regional communities is reflected not only in the long-term jobs we create across France, Italy and Poland, but also in the relations of trust we build up on a daily basis with all local players.

In France, the Group had over 11,800 employees at end-2024, based throughout the country. In addition to Paris, where the Group's head office is located, we have two main operating bases: Marseille, where we have created over 1,100 jobs in the last 10 years, including at one of our main subscriber relations centers and in our Free Pro teams; and the Nouvelle-Aquitaine region, where we now employ nearly 1,000 people, around half of whom at our Bordeaux subscriber relations center. Our strategy of keeping operations local is also illustrated in the network of stores that we now have, covering the length and breadth of France (totaling 230 at end-2023).

Our expanded impact on communities along the value chain

The iliad Group integrates responsible procurement into its value chain to enhance digital access for underserved and vulnerable populations. Through our EcoVadis partnership, we assess supplier CSR performance, ensuring ethical, environmental, and social standards that support inclusive connectivity. Our Partner Relations Charter reinforces these commitments, promoting responsible business practices.

For more information regarding our approach, please visit S2.

Our impact on communities at the endpoints of the value chain through circular economy

Circular economy provides opportunities to enhance digital inclusion, particularly by integrating the principles of Repair, Refurbish, and Recycle across our operations in France, Italy, and Poland. Building on our experiences, the Group is working to apply circular economy principles not only to Freebox but across our entire value chain, including network components, data centers, and mobile phones.

The collected phones are then refurbished, reintroduced into circulation at a lower price, helping to extend their lifecycle, reduce electronic waste, and increase access to telecommunication and digital services for underserved populations.

For more information regarding our approach to circular economy, please visit E5.

Our impact on civil society

Founded in 2006, the Free Foundation has been combating the digital divide for 17 years, providing a powerful illustration of the Group's commitment to its people and society as a whole. Acting in complete independence, the Foundation works to promote digital inclusion projects throughout the country, a more responsible digital environment and open-source software. It now holds internal and external influence benefiting a very great number of people. The Foundation's goal is to provide support to at least 10 projects each year.

At the Free Foundation, we have two calls for projects per year:

- an internal call for projects: the Cohesion program, which rewards associations in which employees are volunteers and with a digital impact;
- an external call for projects, which focuses each year on a specific theme, always with the digital aspect. In 2024, we focused our support on online child protection, in 2023 on digital impact in connection with communities, and in 2022 on culture.

In 2023, the Free Foundation signed a partnership agreement with Konexio, a non-profit that seeks to help marginalized unemployed people or people undergoing retraining programs to find employment via digital inclusion. Through this partnership, Konexio and the Free Foundation will draw on their respective resources and expertise to help these people find jobs. The aim is to teach digital skills and provide training in tech professions – a sector that offers a wide range of career opportunities. In line with the programs and actions carried out by the Group to help young people find work, the Free Foundation has pledged that iliad will take on work-study students trained by Konexio in tech jobs such as web and mobile web developers and senior systems and networks technicians.

Furthermore, to promote digital inclusion, at the 42 Campus in Warsaw, Play's specialists share their knowledge with students. They regularly have meet-ups and discussions with students, not only to share their tech knowledge, but also to talk about how the students' solutions can be put into practice in real-life projects. The first student talks were held in the fall of 2023 and this partnership with the Warsaw 42 Campus will be continued going forward.

In 2023, iliad Italia launched iliadship, a two-year program designed to support young talent through scholarships, workshops, and academic mentoring. Over the next ten years, it will award ten scholarships of €15,000 each to university students under 24 who choose to pursue a Master's degree in STEM, Social Sciences, Arts, or Literature. Alongside personalized tutoring, participants benefit from mentorship by iliad team members and the Advisory Board, gaining valuable guidance to enhance their personal, academic, and professional growth. The program also aims to build a strong community of students, fostering collaboration, knowledge-sharing, and long-term connections.

Metrics and targets

S3-5 – Targets and metrics advancing positive impacts

In 2024, iliad invested €2.0 billion Groupwide, demonstrating efforts of infrastructure investments to enhance high-speed Internet and mobile coverage in rural and low-connectivity regions.

Infrastructure deployment

The iliad Group has made significant progress in expanding its infrastructure across Europe. In France, the Company has achieved 94% 5G coverage while also connecting 38.3 million households to Free Fiber. While the percentage of revenue allocated to investments varies by country, with 22.1% in France, 23.6% in Italy, and 13.0% in Poland, iliad remains committed to driving growth through ongoing infrastructure development.

	2022	2023	2024
% coverage of the population with 5G in France	88%	95%	94%
% coverage of the population with 4G in France	>99%	>99%	>99%
Number of households covered by Free Fiber in France	31.3 million	35.3 million	38.3 million
Number of active new 4G mobile sites rolled out in France	2,206	2,445	2,282
Number of active new 4G mobile sites rolled out in Italy (before impact of network sharing with WindTre)	1,593	1,049	980
% of French revenues devoted to investments	26.6%	25.7%	22.1%
% of Italian revenues devoted to investments	42.7%	22.9%	23.6%
% of Polish revenues devoted to investments	14.0%	12.6%	13.0%

Digital Literacy and Inclusion Initiatives

iliad actively contributes to digital inclusion initiatives. For instance in 2024, over 2,900 phones (vs. 2,350 in 2023) were collected via dropoff boxes that are in place in all Free stores. The phones are refurbished and then sold on to people in need and nonprofits at very affordable prices through the Solidatech program.

4.9 S4 – Consumers and end-users

As a leading European telecommunications provider, this section outlines how iliad integrates consumer-related considerations into its business through:

- **Strategy**: Aligning consumer impacts and risks with business objectives;
- **Impact, Risk, and Opportunity Management**: Policies, actions, and processes to manage consumer-related impacts and risks;
- **Metrics and Targets**: Key performance indicators to measure material impacts on consumers and end-users.

The analysis will focus on four identified IROs, as presented below:

ID	IRO type	IROs	VC location	Time horizon
15	Negative impact	Access to harmful online content causing psychological harm	Downstream	Short term
16	Positive impact	Provision of affordable and innovative services leading to more inclusivity and accessibility	Downstream	Short term
17	Risk	Financial risk linked to loss of customers due to poor customer service	Downstream	Short term
18	Risk	Financial and reputational risks linked to data collection and data and privacy breaches/cyber security	Own Operations, Downstream, Upstream	Short term

Strategy

S4.SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

Interaction of strategy and business model with consumers and end-users

The iliad Group is a leading European telecommunications provider, serving **50.5 million** subscribers in Europe. iliad's strategy and business model are based on high-speed Internet offer and mobile services that foster connectivity through advanced telecommunication infrastructure and innovative solutions. Since our inception, our core ambition has been to provide equal access to the same offerings for everyone, everywhere. Industrial and enterprise users benefit from iliad's private 5G networks, offering superior digital infrastructures.

As a major provider of telecommunications and cloud services, iliad is exposed to significant risks due to the growing sophistication of cyberattacks. These threats can compromise data security and cause service disruptions or outages. Beyond potential reputational and financial impacts, such interruptions could severely affect essential services for the population, including medical and emergency alerts, as well as telecommunications.

Specification of types of consumers and end-users subject to material IROs

The iliad Group engages through various communication channels tailored to the specific needs of different stakeholder groups. This includes engaging subscribers, partners, regulators, and the broader community through feedback mechanisms, collaborative forums, and transparent dialogue. It enables us to develop an understanding of how consumers and/or end-users with particular characteristics or those using particular products or services, may be at greater risk of harm.

The iliad Group recognizes the relevance of various consumer groups to its operations:

1. **Consumers Impacted by Privacy and Rights Issues:** Security of personal data and ensure privacy rights, particularly protecting users from unauthorized data breaches or cyberattacks.
2. **Consumers Requiring Accurate Information:** Accurate and accessible product information, such as manuals, to help consumers use services safely and effectively.
3. **Vulnerable Consumers:** Protection of vulnerable users including children and financially at-risk individuals. Our services, such as parental controls in Free's TV and Internet interfaces, ensure a safer experience for these groups.

The iliad Group does not offer products that are inherently harmful or pose risks for chronic diseases, prioritizing safe services and technology. The only identified material negative impact related to ESRS S4, **access to harmful online content causing psychological harm**, is not specific to iliad's products or services. Instead, it is a broader, systemic issue affecting all telecommunications and cloud companies.

Impact, risk and opportunity management

S4-1 and S4-4 – Policies and actions related to consumers and end-users

The Group has been contributing to the digital revolution for over 20 years now. New digital usages are impacting our lives, and an almost infinite number of sectors of the economy are affected – automotive, housing, entertainment, healthcare, financial services, energy, distribution of goods and services, and many more. Consequently, the subscribers are entrusting t data – which is sometimes sensitive – to a growing number of players, and this data circulates thanks to infrastructure built by operators including the iliad Group.

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

Whether it's protecting our information systems, the personal data we collect, vulnerable populations who use our services, or the health of the people we provide mobile coverage to, all of us within the iliad Group work to secure the data that's entrusted to us. To take digital responsibility, data protection and cybersecurity are fundamental pillars of iliad's business model, and a key element in addressing material impacts, risks, and opportunities (IROs).

Personal data & cybersecurity: fundamental pillars

Processing of personal data and protection of individuals

Regarding applicable data protection regulations, with respect to data relating to the use of its services, the Group is required to store in particular the following data:

- information on the user's identity;
- the information provided by the user when they sign up to a contract;
- information collected for and during the provision of services;
- payment related information;
- the technical data enabling the user's connection source to be identified or relating to the end equipment used, and other traffic- and location related data necessary for pursuing serious criminal charges, preventing terrorism, and/or for the regulatory authorities to carry out investigations. Apart from the information specified in decree no. 2021-1361 of October 20, 2021 – issued in implementation of Article L.34-1 of the Postal and Electronic Communications Code – concerning the categories of data that must be stored by electronic communications operators, the principle is that operators must delete the abovementioned data after one year.

The Group may be required to pass on data it has in its possession on the identification, location and connection of a user of its services but such data may only be provided to duly authorized national, legal and administrative authorities. The information passed on does not include any data concerning the content of any communications or information consulted.

In accordance with Article 100 of the French Criminal Procedure Code (Code de procédure pénale) and Chapter IV of the French National Security Code (Code de la sécurité intérieure), the Group may also be required to carry out legal interceptions of the electronic communications transmitted over its fixed and mobile networks where required by the duly authorized legal and administrative authorities. This type of interception is carried out in accordance with a strict supervisory framework by qualified professionals using equipment that is duly authorized and controlled by the relevant authorities.

Furthermore, it shall be noted that the French Digital Republic Act (Act no. 2016-1321 dated October 7, 2016):

(i) created new rights for individuals (confirmation of the right to control the use of personal data, confidentiality of electronic correspondence, the "right to be forgotten" for minors, the possibility for data users to determine what will happen to their personal data after their death, and the possibility for individuals to exercise their rights electronically);

(ii) increased the information that electronic communications service providers have to disclose in relation to their service contracts (neutrality, information on protecting individuals' private lives and personal data and the consequences on the quality of Internet access of any limitations in terms of volume, speeds or other factors); and

(iii) strengthened the responsibilities and enforcement powers of the CNIL (the French data protection authority).

Certain provisions of the Digital Republic Act were an early adoption of the requirements of EU Regulation 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (the General Data Protection Regulation, or "GDPR", which came into force on May 25, 2018). The GDPR, which repeals Directive 95/46/EC, extends the scope of the regulatory framework for personal data protection, strengthens privacy rights and increases the maximum amount of the fine that may be imposed for non-compliance to 4% of global revenue.

Subsequent to the GDPR coming into force, French Act no. 2018-493 on personal data protection and decree 2018-687 were introduced to amend France's previous Data Protection Act (Act no. 7817). It brings France's legislation into compliance with the GDPR and EU Directive 2016/680 on the protection of natural persons with regard to the processing of personal data by competent authorities for the purposes of the prevention, investigation, detection or prosecution of criminal offenses or the execution of criminal penalties, and on the free movement of such data. This Personal Data Protection Act also gave additional powers to the CNIL and removed the existing system of prior declaration and authorization from the CNIL for personal data processing.

Following the introduction of the new French Personal Data Protection Act, on December 12, 2018 (law no. 2018-493), a government order (order no. 2018-1125) was issued to clarify the provisions of the previous Data Protection Act (Act no. 7817) related to information technology, computer files and civil liberties. On June 1, 2019, a decree dated May 29, 2019 came into force implementing the new French Personal Data Protection Act. This decree was the final stage of the process to bring French national law into line with the GDPR.

Its main objectives were to clarify France's legal framework in this area and ensure that national regulatory provisions are consistent with EU law and the French legislation introduced in application of EU law. In order to take into account the specific characteristics of the electronic communications sector, another EU Regulation concerning privacy and personal data protection in electronic communications is currently being drafted, which will repeal Directive 2002/58/EC (the "e-Privacy Regulation").

A proposal for a regulation to establish additional procedural rules relating to the application of the GDPR was presented by the European Commission on July 4, 2023 and is currently being drafted. This regulation was expected and should facilitate the handling of files involving the cross border processing of personal data, as well as organizing cooperation between national data protection authorities.

Building on the Data Governance Act adopted on May 30, 2022, the EU is now extending data protection from personal data to include non-personal industrial data. A provisional agreement was reached between the European Council and Parliament on June 27, 2023 on a new regulation on harmonized rules on fair access to and use of data (the "Data Act"). The Data Act aims to ensure fairness in the allocation of value from data among players in the digital environment, and in particular concerning Internet of Things (IoT) technology, which generates vast volumes of data with high economic potential. As such, it will be a key regulation for the Group's projects.

Example of data protection initiative in Poland

The Polish Telecommunications Act provides for the protection of "telecommunications secrets" (users' data, content of individual messages, transmission data, location data and data related to attempted calls).

In 2009, the Telecommunications Act was amended in order to implement the obligation to retain connection related data introduced in the EU Data Retention Directive. This obligation applies to several categories of data necessary for establishing a connection to or from a mobile network:

(i) the source of the connection;

(ii) the outgoing call number;

(iii) the date and time;

(iv) the duration of the call;

(v) the telecommunications equipment used; and

(vi) the place where the connection was made. The length of time that the data must be retained varies between the EU States from six months to two years. The applicable period under Polish law is 12 months. The GDPR entered into force in Poland in May 2018.

Ensuring cybersecurity for sustainable business operations

Cybersecurity for telecom sector is strategic because of the immediate and systemic consequences that an incident could cause if it occurred among the various players in the sector, including operators, equipment manufacturers, web hosts and Internet interconnection points. Service availability is a top priority, but it must not come at the expense of data confidentiality or the integrity of information systems, which ensure the continuous operation of essential state services, such as emergency call routing and Internet access.

Governance

The iliad Group implements a cyber governance and strategy based on the **ISO 27001 standard** pillars, supported by cybersecurity departments, to meet current challenges but also to plan for tomorrow's challenges, particularly with regard to the transposition of NIS2 (Network and Information Systems) at the national level. As part of the development of the Information Security Management Systems (ISMS), the cybersecurity governance is based on a clear structure and defined responsibilities.

Group cybersecurity governance is under the sponsorship of the deputy CEO, which sets strategic directions and supports their implementation through appropriate resources, especially by the Chief Information Security Officer (CISO) of each country and business lines.

A monthly Cybersecurity Committee chaired by the Management or another authorized person brings together representatives from different entities. It oversees actions and is responsible for monitoring security indicators, validating action priorities and ensuring the consistency of security efforts with the Company's strategic objectives.

Security alerts with information bulletins are regularly shared to raise awareness of cyber threats that could lead to data breaches or cyberattacks. Public Affairs and Regulatory departments are involved to anticipate and analyze the requirements of regulators and our counterparties.

Policies

Ensuring the information security, reliability, availability, continuity and quality of telecommunications services is a priority objective for all iliad entities. The Group undertakes to:

- meet legal, regulatory, contractual, industry and organizational information security and business continuity requirements;
- supervise compliance with the rules and requirements concerning the security of systems, data and services provided;
- apply technical and organizational measures to protect systems, data, network integrity and services based on risk assessments and available guidelines and standards;
- continuous improvement in cybersecurity.

Our objectives include:

- identifying, planning and implementing strategies and solutions to minimize the likelihood, reduce the impact or shorten the time of potential disruptions to key processes and services provided by the iliad Group;
- preparing and consistently improving the business continuity plans and procedures for restoration activities as a response to possible disruptions, enabling the recovery of key processes and services and the return to normal operations as soon as possible;

- maintaining the highest possible level of information security and operation of key processes and services in the event of security incident or crisis situations;
- conducting effective communication with all interested parties in the event of security incidents or crisis situations;
- developing the awareness and competences of employees to enable operations are also possible in the event of disruptions or crisis situations;
- monitoring processes conducted in cooperation with partners, suppliers and contractors – in terms of ensuring both information security and business continuity;
- consistent testing and auditing of the Management System, to continuously improve the effectiveness of the system;
- avoiding solutions specific to a given project and/or process;
- diversifying ICT service providers while ensuring service continuity and supply chain security;
- setting goals, including their measurement (KPIs) and ensuring adequate resources to achieve them.

To maximize resilience to widely understood disruptions and crisis situations, taking into account local regulatory requirements and the scope and scale of the operations conducted by the Group entities, individual entities have implemented the Management System (a set of policies, procedures, processes, rules and security measures) in line with the requirements of ISO 27001, ISO 27017, ISO 27018 (Information Security Management System) and ISO 22301 (Business Continuity Management System) as well as guidelines of European Union Agency for Cybersecurity (ENISA) and National Institute of Standards and Technology (NIST).

The implemented Management Systems include the following activities:

- asset management and monitoring the continuity of systems, networks and services;
- critical assets necessary for the delivery and continuity of network and service operations are subject to a risk assessment process in the context of identified threats;
- application of adopted security principles for the production, development and maintenance of systems, network integrity and services provided;
- assigning a set of data (e.g. login, password, certificate) to each user, which constitutes its digital identity;
- collecting information on potential and current threats and vulnerabilities related to systems, networks and services, including components/modules based on available sources and their analysis. It is in order to plan and implement technical and organizational security measures to counteract or minimize the possibility of a security incident;
- developing and strengthening competencies in cybersecurity and operational cyber resilience based on defined security requirements, including for ICT service providers and market best practices;
- each employee must complete introductory information security training and familiarize themselves with the applicable policies, procedures and instructions for their job position;
- training in specific procedures or technologies and improving competencies is provided as part of the annual training plan or as part of dedicated events. The SOC team maintains a register of security incidents including their classification, priorities and areas of impact and oversees the preparation of periodic reports and recommendations as part of the incident response lifecycle.

Threats

The most characteristic and significant cybersecurity risks to which the sector is exposed are those related to:

- **espionage operations**: mainly target the exfiltration of massive data processed by players in the sector by targeting critical equipment, including routers at the heart of the network via sophisticated attacks carried out over a long period of time;
- **credential & Data Theft and Phishing Attacks**: Cybercriminals are increasingly using sophisticated techniques to deceive employees and gain unauthorized access to sensitive systems and data;
- **destabilization**: denial of service, theft of published data;
- **ransomware & sabotage operations**: actors close to certain states, may include intentional cable cutting or destruction of physical infrastructure (networks, cables, radio equipment);
- **disinformation**: could impact its brand image as a network operator.

The occurrence of any of these risks could have a negative impact on the availability of service and on the Group's reputation.

Cybersecurity Risk identification

The risk identification and management plan are regularly updated to adapt preventing and mitigating measures. In particular, operating procedures are updated and implemented for:

- network security management (e.g., firewall and system intrusion detection/prevention);
- data and systems management (e.g., back-up, data encryption, patching, retirement and reuse of technologies, information exchange);
- physical security management (e.g., secure premises, access management, system damage and tampering);
- device management (e.g., computers, mobile phones).

Incident prevention and response

Incident response is carried out in accordance with the implemented Incident Management Procedure, following applicable principles, roles, and business requirements (including legal requirements). The goal is to limit damage and restore the integrity of networks, services, processes, or Information Systems within the agreed timeframe. The incident response lifecycle defines the following phases: (i) Detection and analysis; (ii) Containment; (iii) Eradication; (iv) Recovery; (v) Post-incident activity. The SOC and Cybersecurity Analysis Team Leader is responsible for managing incidents at iliad.

An escalation procedure has been put in place to report any security incident, irrespective of the origin of the detection. In the event of a security incident, the authorities that oversee GDPR compliance (such as the, Commission Nationale de l'Informatique et des Libertés, (CNIL) in France) and/or cybersecurity (the ANSSI in France) are informed in accordance with regulatory requirements. A crisis unit (chaired by the CEO of the entity affected by the incident) decides whether and how to communicate externally about the incident, in liaison with iliad's Board of Directors.

Operational mode

The Management Systems ensure cybersecurity resilience by continuously monitoring dynamic cyber threats and adapting policies and procedures accordingly. It encompasses formalized management of critical areas, compliance with regulations, and standardized security practices across all processes. Key principles include incident identification, continuous improvement, and lifecycle management of services and systems. It also prioritizes cybersecurity training, risk mitigation, supplier diversification, and robust access control.

Regular updates, testing of recovery plans, and adherence to best practices strengthen the system's ability to support business continuity and safeguard information assets.

Our European entities are equipped with Security Operations Centers (SOC). In Poland and Italy, these are internal SOCs operated by dedicated iliad teams, including analysts and other cybersecurity professionals. In France, the SOC is outsourced but remains within the group, as it is operated by Itrust. These SOCs provide continuous monitoring of applications, servers, and workstations, ensuring proactive threat detection, forensic and incident response to strengthen our overall cybersecurity posture.

Our equipment is hosted within our own premises and all these measures are carried out by our technical teams, with the support of our subsidiary, ITrust – French pure player in cybersecurity leader in this domain since 2007. Its robust AI-driven technologies enable threats to be effectively identified and addressed.

All these strategic choices mean that we can control our products and services, as well as our entire value chain and enables us to react quickly to events or crises.

Culture, training and awareness

Cybersecurity is closely tied to employee awareness, making continuous training essential for strengthening defense against digital threats. To make sure that employees fully understand these issues, the Group has set up a specific training plan and provides them with appropriate support on cybersecurity and personal data protection. Awareness and training programs are organized to:

- promote a culture of digital security accessible to all;
- train diverse profiles in cybersecurity issues, by encouraging diversity and inclusion in the teams responsible for security;
- strengthen awareness of the social and environmental impacts of the use of technologies.

All employees receive specific training adapted to their individual exposures to cyber risk. For example, telecom engineers and field service technicians are given highly targeted training, and awareness campaigns are regularly organized so that adopting best practices becomes second nature.

In 2024, 6,879 of iliad's employees received a training on cybersecurity (44.1% of the workforce). In Italy, all iliad employees were given mandatory cybersecurity training in 2024. In France, Italy and Poland, a cybersecurity training module is included in the onboarding process, and all new hires are given this training when they join the Company. Our goal is for 90% of our employees to complete cybersecurity training within the last two years by 2027.

Cybersecurity for our clients

Because protection against cybercrime depends on everyone being vigilant, including our customers, we have put in place a range of support solutions. We also offer specific cybersecurity solutions for our B2B customers, particularly using ITrust products. Lately, Itrust cybersecurity solutions were onboarded in our Freebox Pro offer to provide cybersecurity solutions to our B2B clients.

2024 notable events (Customer Relationship Management incident) and iliad's response

Faced with the increasing number of cyberattacks, the Group has developed its measures for protecting its information systems in its three geographies. Nevertheless, in 2024, iliad experienced a cyberattack in France on retail activities targeting a Customer Relationship Management (CRM) system. It resulted in unauthorized access to certain personal subscriber data such as names, contact details, and contractual information. Actions were immediately taken to contain and resolve the security breach, including ensuring system security. The incident was reported to regulatory authorities and affected customers were notified. A criminal complaint was also filed.

The attack that the company and subscribers suffered allowed us to test our ability to react very quickly and in an organized manner:

- subscribers were notified only two days after the attack, the time it took us to identify them, in accordance with the CNIL (*Commission nationale de l'informatique et des libertés*) recommendations and aligned with GDPR requirements (please refer to section 1.6.2);

- the crisis unit, mobilized several times a day, quickly deployed the necessary security measures to prevent new attacks;
- the effectiveness of these security measures was tested at the end of the crisis.

The growing customer demand for the availability of electronic communication services, the scale of operations of sector entities, ongoing M&A processes, new regulations and increasingly sophisticated cyberattacks force the Group to constantly update its approach to cybersecurity.

Following the Q4 2024 cyber-attack, a remediation plan had been built on the principles of **Identify, Protect, Detect, and Respond**, with key priorities:

- **foundation**: With strong governance and clear objectives, we are adjusting and fine-tuning the key building blocks of our Information Security Management Systems (ISMS) and related security policies. Our goal is to apply them consistently across all systems, ensuring a unified approach to security throughout the organization;
- **development of Risk management**: Building on this foundation, we are making significant progress in our approach to security. We identify threats, manage security across all projects, and protect critical assets with strong authentication in access processes. These actions strengthen our security, help us anticipate threats, and ensure compliance with regulations. Additionally, we cultivate a proactive security culture, where security is integrated from the business idea stage to the finished product or service.

Overview of policies and regulations subject to material IROs

At the iliad Group, we recognize the importance of aligning our policies and regulatory compliance efforts with the material impacts, risks, and opportunities (IROs) that shape our business. With core values as liberty, honesty, and simplicity, our approach aligns with international human rights standards.

The table below outlines how our **policies and regulations address key IROs related to S4**. These should be understood **in conjunction with the policies and regulations mentioned in S3**.

Major Policies and Regulations	Negative Impact: Access to Harmful Online Content	Positive Impact: Affordable & Innovative Services	Financial Risk: Loss of Customers Due to Poor Service
Personal data protection Charter (group-level)	Helps prevent unauthorized access to harmful content by securing user data and communication channels.	Supports innovation by providing a secure digital environment, encouraging adoption of new services.	Enhances customer confidence and reduces churn by ensuring data protection and service reliability.
Personal data protection policy (Free SAS, Free Mobile)			
Digital Services Act – DSA	The DSA imposes stricter content moderation rules on digital platforms, requiring removal of illegal content and implement risk assessments to prevent the spread of harmful material.	N/A	The DSA enhances transparency and accountability for digital platforms, ensuring users can make informed choices.
LCEN (Law for Confidence in the Digital Economy) Act	The LCEN mandates platforms to remove illegal content and ensure proper reporting mechanisms, creating a safer digital space for users.	N/A	The LCEN enhances consumer protection through transparency and clear communication, helping iliad maintain high service standards and reduce customer churn.

Major Policies and Regulations	Negative Impact: Access to Harmful Online Content	Positive Impact: Affordable & Innovative Services	Financial Risk: Loss of Customers Due to Poor Service
GSMA (Global System for Mobile Communications)	Provides guidelines for mobile providers, including the protection of users from harmful content consumers with a way to report issues.	Ensures mobile technology is developed with a focus on consumer safety and accessibility.	Promotes customer satisfaction and trust through adherence to best practices.
French Consumer Code	Ensures that consumers are not harmed by unethical content or practices related to product design or marketing.	Protects consumers by ensuring access to fair, transparent, and affordable services.	Helps prevent complaints and disputes related to service quality or unfair practices.
GDPR (General Data Protection Regulation)	Directly addresses concerns around harmful data misuse, ensuring protection against content exploitation.	Ensures consumer privacy, which is crucial for creating trust and promoting user access to services.	Reduces the risk of data breaches and potential customer dissatisfaction.
French Digital Republic Bill (Loi pour une République Numérique)	Directly impacts the regulation of online content, ensuring protection from harmful or illegal content.	Enhances digital rights, ensuring consumers can safely access services with appropriate protections.	Prevents loss of customers due to concerns over privacy and data safety.
Cyber security policy	Regular cyber risk analysis, ISSP (Information Systems Security Policy) updates, encryption of access, and trusted technical partners help mitigate exposure.	N/A	Cybersecurity training, risk assessments, and robust security measures enhance service continuity and customer confidence.
Policy for Equal rollout of equipment and infrastructure	N/A	We have a policy to give everyone, wherever they live, equal access to digital technologies.	N/A
R&D Policy	Policy of keeping R&D inhouse wherever possible. We have put in place incident detection surveillance systems and our networks are isolated, with end-to-end encrypted data transport.	N/A	Incident detection and network isolation ensure service stability.

The Iiad Group dedicates significant resources to manage both negative and positive impacts:

- *content Monitoring:* Investments in content monitoring systems and legal compliance measures;
- *infrastructure and Accessibility:* Continuous investment in user-friendly technology, multi-channel support, and infrastructure to promote digital inclusivity;
- *service Improvements:* Ongoing service enhancements to ensure responsible and inclusive connectivity. The iliad Group invests for instance in VDSL2 (Very-high-bit-rate Digital Subscriber Line 2) and 10G fiber services, to improve customer satisfaction and service innovation.

Policies and actions to address harmful online content

As the table shows above, digital responsibility is a key priority, especially in terms of protecting vulnerable groups from harmful online content. We've implemented robust policies to ensure user safety while adhering to legal and regulatory frameworks. For instance, Free takes action by:

- a parental PIN system for television content control;
- remote parental controls and WiFi scheduling via FreeboxOS and Freebox Connect to manage screen time and content access.

In compliance with French law, the iliad Group stores necessary user and connection data to support security and regulatory efforts, particularly in preventing terrorism and prosecuting serious criminal activity. We collaborate with authorities like ANSSI and ARCOM to comply with regulations requiring us to block access to illegal content, such as child pornography and unlawful gambling sites.

Personal Data Protection Charter ensures subscriber privacy and security through encryption, anti-phishing protections, and proprietary infrastructure, reinforcing trust and compliance. Furthermore, the iliad Group employs designated Data Protection Officers in France, Italy and Poland and a network of GDPR correspondents to uphold privacy and individual rights, ensuring transparency in data handling practices.

As developed in S4-2 & S4-3, the iliad Group takes immediate action when a material negative impact is identified through several channels, including Complaints Procedures accessible via terms and conditions and customer support.

Policies and Actions to enhance affordable and innovative services

At iliad, our mission is to make digital technology accessible to everyone by offering innovative and affordable services. Our commitment includes:

- **Bridging the Digital Divide**

  As a key player in regional development, the iliad Group invests significantly in expanding its Fixed and Mobile networks to bridge the digital divide. By continually enhancing our infrastructure, we ensure that high-quality digital services reach underserved and remote areas. This commitment is reinforced by our adherence to fair pricing policies that make telecommunications services more accessible to a broader population. Free has not increased the price of its more popular mobile plans (€2 and €19.99) for 10 years. In January 2022, Free has pledged not to do so for the coming five years, until 2027.

- **Supporting Disadvantaged Communities**

  We actively support programs that provide digital access to those in need. The Free Foundation supports the Ateliers du Bocage, a member of the Emmaüs movement, by donating phones collected within iliad. This initiative has provided essential digital tools to people experiencing long-term unemployment or disability.

- **Ensuring Inclusive Digital Services**

  The iliad Group is committed to making telecommunications accessible to everyone, including individuals with disabilities. In compliance with the French Digital Republic Act, we provide written and visual simultaneous translation for support services to ensure accessibility for people who are deaf, hard of hearing, blind, or aphasic.

- **Promoting Open Innovation**

  Innovation is at the core of our strategy. Through the Free Foundation, we support open-source software communities by providing servers to non-profit organizations such as "Open Food Facts", a Free, online and crowdsourced database of food products from around the world licensed under the Open Database License.

Policies and Actions to address financial risk linked to loss of customers due to poor customer service

At the iliad Group, we recognize that poor customer service can lead to dissatisfaction, churn, and financial loss. To mitigate this risk, we focus on accessibility, service quality, and continuous improvement:

- **Multi-Channel Support**

  Our 7/7 customer hotline, email, app, mail, and social media support ensure prompt responses and first-contact resolution. The Group's mobile subscribers in Italy are provided with a Customer Care Department tackling customer service issues.

- **Localized Free Proxi Teams**

  Our Free Proxi teams offer local support across regions, ensuring customers receive personalized help that fits their needs. They operate from 8:00 a.m. to 9:00 p.m with a commitment to resolve cases typically within 15 minutes.

- **Training & Service Excellence**

  Continuous training, including the Skill & Play program, enhances staff responsiveness and service quality.

- **Technology-Driven Improvements**

  We leverage tools to track, classify, and resolve queries efficiently, incorporating real-time feedback from post-contact surveys.

- **Physical Presence & Personalized Support**

  For instance with 700+ Play stores in Poland, our network ensures in-person assistance and tailored solutions for all customer segments.

S4-2 and S4-3 – Processes for engaging with Consumers and End-Users and remediating their concerns

Overview of processes for engaging with consumers and end-users

At iliad, we are committed to engage with consumers and end-users through a structured approach across its operations in various countries. Our partnerships with civil society, industry bodies, universities, and NGOs help us anticipate social trends and support inclusivity.

We build long-term relationships with subscribers (B2C, B2B, and public authorities) through regular, in-depth contact. This helps us better understand the needs of all consumers, including vulnerable groups like people with disabilities and children. Through our involvement with industry initiatives, we ensure that our services meet high standards of accessibility. Initiatives like the Free Foundation and collaborations with think tanks on responsible digital technology also support marginalized groups.

Key engagement mechanisms

The iliad Group ensures consumer and end-user perspectives are central to decision-making by engaging regularly through multiple channels at every stage of the customer journey:

- **Free Proxi**: subscribers can easily report issues and receive quick assistance from the Free Proxi teams, with 90% satisfaction, thus improving service and customer satisfaction;
- **customer satisfaction surveys**: helps identify problems, improve services, and strengthen customer loyalty;
- **whistle-blowing system**: allows reporting of harmful content and unethical practices, ensuring transparency and protecting iliad's reputation;
- **regulatory bodies (ARCEP, CNIL)**: users can report illegal content or poor service if unresolved;
- **industry bodies & Non-Governmental Organizations**: collaborate with for instance GSMA and ADEME to standardize sector-specific practices to improve services, and prevent issues;

This structured engagement strategy ensures high service quality, responsiveness, and accessibility for all users—including vulnerable groups.

Addressing consumer concerns and implementing remedial actions

In line with regulatory requirements, the iliad Group outlines its processes for addressing negative impacts on consumers and end-users, providing accessible channels for concerns, and ensuring effective resolution.

The Group adheres to legal frameworks, implements robust policies for online safety, and ensures compliance with consumer protection regulations. iliad has established a whistleblower mechanism (cf. G1) and accessible complaints procedures are outlined in the terms and conditions provided to subscribers. The Legal Department reviews all communications to mitigate legal and reputational risks, ensuring effective remediation. Consumers can raise concerns by contacting French regulatory authorities, such as:

- the French Data Protection Authority (CNIL), if the issue relates to privacy or data protection;
- the French Telecommunications Regulatory Authority (ARCEP), if the concern is related to telecommunications services;
- the French Audiovisual and Digital Communication Regulatory (ARCOM) regarding a content, program, advertisement or replay.

Regarding online illegal content, via the provisions set out by the LCEN (Loi pour la Confiance dans l'Économie Numérique), consumers can directly contact the Group companies concerned and/or refer the matter to the competent authorities.

The iliad Group ensures the availability of complaints channels in business relationships through the Partner Relations Charter which outlines our approach to complaint mechanisms and the availability of a whistleblower system. It stipulates that any violation of the rules and principles set forth in the Charter, requiring corrective action, will be considered a breach of contractual obligations.

The Group's mobile subscribers in Italy are provided with technical support and aftersales services through a telephone helpdesk platform run by Group service providers.

Metrics and targets

S4-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities,

The iliad Group is committed to minimizing negative impacts on consumers and end-users while maximizing positive contributions. Currently, the Group has not set formal, time-bound, outcome-oriented targets specifically related to the material IROs. However, iliad acknowledges the importance of structured objectives and is working to define measurable targets to strengthen its consumer-focused initiatives. While not all aspects can be quantified, the indicators in the table below are disclosed in terms of data protection and cybersecurity.

	2022	2023	2024
Number of iliad's employees receiving cybersecurity training	NA	NA	6,879
% of the average annual iliad's workforce receiving cybersecurity training	NA	NA	44.1%
% of countries where the iliad Group operates with a DPO	100%	100%	100%

4.10 G1 – Business conduct

This section outlines the iliad Group's approach to governance, risk management, business conduct, and related policies, in line with ESRS 2 disclosure requirements. It covers:

- **Governance**: The role of administrative, management, and supervisory bodies in ensuring ethical business practices and aligning governance with business objectives;
- **Impact, Risk, and Opportunity Management**: Processes for identifying, assessing, and managing material issues such as corruption, bribery, and political influence;
- **Metrics and Targets**: Key performance indicators to track the effectiveness of governance practices.

Starting from the above, the analysis will focus on the following risks and opportunities identified through our DMA (Double Materiality Assessment), as presented below:

ID	IRO type	IROs	VC location	Time horizon
19	Risk	Exposure to corruption and bribery risks	Upstream	Short term
20	Opportunity	Infrastructure investment and market expansion through political engagement	Downstream	Medium term

In line with our identified IROs, delayed supplier payments may be influenced by factors such as corruption, financial mismanagement, and political or market conditions. These disruptions can affect both iliad's financial stability and that of its suppliers, and will therefore be addressed in the sections below. By managing these risks, iliad aims to ensure timely payments, promoting stronger relationships and business continuity.

Governance

G1.GOV-1 – The role of the administrative, management and supervisory bodies

The iliad Group's governance framework ensures effective oversight, ethical business conduct, and strategic decision-making. The **administrative, management, and supervisory bodies** play a vital role in guiding leadership, managing risks, and driving sustainability efforts across the organization particularly in light of the identified IROs.

For more detailed information, please refer to ESRS 2, which defines the composition of the administrative, management, and supervisory bodies and their access to expertise and skills with regard to sustainability matters.

Additionally, see section 3.1 of the URD for details on the membership structure of the Company's administrative and management bodies, section 3.2 for the organization and operating procedures of the board of directors, and section 3.3 for the organization and operating procedures of executive management and management bodies.

G1-1 – Business conduct policies and corporate culture

The iliad Group is committed to ethical business conduct, embedding transparency and integrity throughout its operations. To ensure ethical business conduct, iliad has established comprehensive compliance measures, including an anti-corruption program, a whistleblower system, and continuous training. These initiatives ensure that ethical standards are upheld, reinforcing the Group's commitment to responsible business practices and sustainability.

Corporate culture

Corporate culture is a strategic focus for the iliad Group's Board and Top Management, regularly assessed through engagement surveys and leadership discussions, ensuring it remains aligned with business objectives and employee expectations.

While each country has distinct corporate culture pillars, iliad fosters a culture that balances local identities with shared Group values: Liberty, Honesty, and Simplicity. These values define the Group's approach to business, shaping its relationships with consumers, employees, and stakeholders.

Corporate culture by region

In France and Morocco, Free's corporate culture is structured around five pillars that shape its employer brand and workplace environment:

- impact reflects the Company's longstanding commitment to challenging industry norms and defending consumer rights;
- agility fosters an entrepreneurial culture where teams take ownership and move fast;
- Freedom creates trust and autonomy where employees are encouraged to take initiatives;
- fullfillness ensures that the workplace is open and inclusive, allowing employees to thrive;
- learning and growth promote extensive efforts in training, development, and internal mobility, enabling employees to build long-term careers within the company.

In Italy, iliad's corporate culture is guided by the values of Transparency, Simplicity, Teamwork, Commitment, and User-Centricity. Transparency ensures that communication remains clear and open, both internally and externally, reinforcing trust. Simplicity drives the Company's approach to operations and customer service, to create an efficient and seamless experience. The collaboration is the basis for the management of every project and activity. A strong spirit of teamwork is cultivated across the organization, and the value of commitment underscores iliad's dedication to excellence, pushing teams to improve and innovate. Lastly, the Company places the user at the center of every decision to deliver the best possible experience.

Through direct employee involvement, iliad Italia has developed leadership model, which focuses on the importance of corporate culture in terms of values, vision and ability to connect; the aim of empowering talent through listening, engagement and autonomy; the ability to hack the future with an entrepreneurial mindset, agility and the courage to change.

In Poland, Play's culture is structured around the values of Clarity, Care, Can-Do Attitude, Passion for Progress, and Joy. Clarity is fundamental to Play's operations, ensuring transparency both within the Company and with customers. Care represents a strong commitment to employee well-being and customer satisfaction. The Can-Do Attitude drives a culture of problem-solving and perseverance. A Passion for Progress fuels the Company's ambition to continuously improve and push boundaries, maintaining its leadership in the Polish telecom market. Lastly, Joy is an essential part of Play's workplace culture with a focus on celebrating successes.

Driving cultural alignment and employee engagement across the group

The Group's leadership actively drives cultural alignment by ensuring that executives and managers lead by example, integrating corporate values into their decision-making and daily interactions. Decision-making is structured to encourage autonomy and agility, reinforcing a flat hierarchical structure that allows teams to operate with speed and flexibility. Cultural fit is a key consideration in talent management, which assesses candidates' ability to thrive in a fast-moving environment that demands adaptability and a hands-on mindset.

The iliad Group reinforces its corporate culture through regular internal communication channels, such as company-wide newsletters, internal events and Q&A sessions, ensuring that employees are connected to iliad's strategic direction and values. The annual social barometer survey provides insights into employee satisfaction, workplace well-being, and alignment with corporate culture.

Responsible business conduct

The iliad Group is dedicated to upholding the highest standards of business conduct, ensuring transparency, accountability, and respect for all stakeholders. We maintain ethical practices through systems that address concerns and protect whistleblowers, promoting integrity across our operations.

This section highlights key initiatives, including our ethical alert mechanism, employee training, incentives, and identification of high-risk functions, all supporting our core values of liberty, honesty, and simplicity. For more information on the policies supporting ethical business conduct, please refer to "iliad's Key Policies for Responsible Conduct" below.

Ethical alert mechanism and whistleblower protection

The iliad Group has implemented an ethical alert mechanism to identify, report, and investigate concerns related to unlawful behavior or actions that contradict its code of conduct or internal rules. The system is accessible to internal employees and external collaborators, including occasional partners, and allows for anonymous submissions. It ensures the confidentiality of all reports, protecting the identity of whistleblowers and maintaining the integrity of the investigation process, in compliance with data protection regulations. The system serves as an alternative to traditional hierarchical reporting channels, ensuring individuals can report concerns without fear of reprisal.

The ethical alert mechanism is implemented across all international subsidiaries, adhering to local regulations and reinforcing the protection of whistleblowers as per the Waserman law and its application decree. The iliad Group protects whistleblowers from retaliation, including discrimination or sanctions, and extends this protection to individuals assisting whistleblowers and those connected to them professionally.

In France, an ethical alert system has been designed to be compliant with Directive (EU) 2019/1937, and compliant with French, European, and international regulations applicable to our subsidiaries, including the Sapin 2 and the Waserman law. This system is accessible to all internal, external, and occasional collaborators, providing a secure and supportive environment for whistleblowers. Reports can be submitted via a secure, user-friendly platform at alerteethique.iliad.fr. In other countries, especially Italy and Poland, a similar platform can be used (e.g. https://iliad.parrotwb.app/in Italy, and https://play.vco.ey.com/ in Poland). All platforms ensure confidentiality and allow for anonymous reporting. The Group employs rigorous technical and organizational measures to ensure the highest level of data security. Regular updates and monitoring of the system are conducted to maintain its effectiveness and compliance with legal standards.

The ethical alert system covers a wide range of issues, including crimes, violations of international commitments, EU law, national laws, and regulations. It addresses threats to the public interest and breaches of the Company's Code of Conduct, such as accounting irregularities, harassment, discrimination, corruption, competition issues, environmental protection, and human rights violations.

Whenever the need for an investigation arises, the Ethics and Compliance Service conducts a preliminary assessment to determine its validity. If deemed valid, an internal investigation is initiated. The Ethics Committee oversees this process, with the authority to investigate both internal and external fraud.

Training Programs

To embed our ethical business principles, new hires at the iliad Group undergo comprehensive onboarding processes, including a 'Welcome Day' and subsidiary-specific integration programs.

Furthermore, the Group provides mandatory training on cybersecurity, GDPR, and workplace safety. Training is delivered through permanent awareness initiatives, e-learning modules, and in-person sessions, with content regularly updated to reflect changes in regulations and Company policies.

The iliad Group implements training programs that highlight anti-corruption measures and the ethical alert system. Organized by the Human Resources and Ethics and Compliance departments, these sessions ensure that all employees, particularly those in high-risk positions, are well-informed about procedures and corruption-related risks.

For more information regarding our anti-corruption training, please visit G1-3.

Employee incentives and career advancement

Employee incentives at iliad include equitable pay, opportunities for internal movement, professional growth, and recognition of achievements. Managers are equipped to support career advancement and are expected to exemplify ideal conduct.

High-Risk functions and risk management

The iliad Group has conducted a risk mapping exercise to identify high-risk functions for corruption and bribery. Key roles with elevated risk include Procurement and Purchasing roles due to their involvement in supplier selection and contract negotiations. Human Resources faces risks of favoritism and undue influence, especially in recruitment and promotions. Finance and Accounting personnel are at risk of engaging in corrupt financial transactions. Public Relations and Lobbying roles are exposed to risks due to interactions with public officials. Any other roles involving frequent exchange of gifts or invitations, positions requiring regular contact with public officials, and decision-making roles with authority over supplier selection or contract awards are identified as high-risk. Employees with access to confidential information and roles involving interactions with external collaborators are also considered high-risk.

iliad's key policies for responsible conduct

To support responsible business conduct and integrity practices, the iliad Group has designed a series of key policies presented below (for information regarding our Procurement Policy, please see G1-2). These policies, managed by the Group Head of Ethics & Compliance, with oversight from the Chief Risk Audit and Compliance Officer, cover a wide range of areas, from managing gifts and invitations to addressing conflicts of interest and anti-corruption measures. These policies are adapted to local regulations, norms, and the size and activities of each entity. Currently, these policies do not apply to ITrust and Madiacom, as they were recently integrated into the Group's consolidated scope. However, measures will be introduced soon to ensure that these companies have equivalent procedures.

Gifts And Invitations Policy

A Gifts & Invitations Policy is designed to provide clear guidelines for the acceptance, provision, and management of gifts, hospitality, and invitations within an organization. This policy applies to all employees of the iliad Group and covers the declaration and monitoring of gifts, invitations, and hospitality.

Code of Ethics

Our Code of Ethics is binding to everyone who works with us. We expect all employees to act responsibly with respect to their colleagues as well as towards our clients, suppliers and any other party outside the Group with whom they have a working relationship. Anyone who breaches the Code of Ethics may be subject to disciplinary sanctions.

Anti-Corruption Code Of Conduct

The objective of the Anti-Corruption Code of Conduct is to set clear standards for preventing corruption and bribery within an organization, to describe the Anti-Corruption Plan, and to provide employees with details about their obligations and best practices. This includes outlining concrete examples of acceptable and unacceptable behavior, with the goals of promoting ethical behavior and ensuring compliance with laws.

G1-2 – Management of relationships with suppliers

The iliad Group is committed to building strong, ethical partnerships with suppliers through continuous assessment and alignment with our core values, including business ethics, environmental protection, and human rights. This section outlines our procurement policy, CSR performance monitoring, and fair payment practices across the Group. Key results and indicators of our supplier engagement and sustainable procurement efforts are also highlighted.

Please **read this in conjunction with ESRS S2** for further details.

Procurement policy and processes

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

We assess CSR performance of strategic suppliers. Selection for review is based on an ethical and non-compliance risk map, combining criteria such as the supplier's industry, regional location, and business volumes.

The Group also published a Partner Relations Charter setting out the principles and commitments it imposes on itself and its suppliers. These principles are aimed at strengthening CSR practices, improving the Group's social and environmental performance, and contributing to risk management.

In 2020, we developed a proprietary supplier management system designed to facilitate our relationship with these stakeholders and track their CSR performance. In line with our S2 disclosures, our key achievements in 2024 include:

- the iliad Group set a target of **covering 50% of its expenditures with EcoVadis assessments by 2025**. This target was exceeded in 2024, with a **coverage rate of 52%**;
- in 2024, 811 suppliers were assessed by EcoVadis;
- our average supplier score is 61/100 – exceeding the EcoVadis average by 14 points.

For more details on how we translate commitments into action, see the tables below.

	France	Italy	Poland	Total
% of 2024 expenses from suppliers assessed via EcoVadis	57%	77%	24%	52%

	2022	2023	2024
% of new suppliers and providers undertaking to respect our ethical principles	100%	100%	100%
% of assessed suppliers to have implemented an anti-corruption policy	77%	78.4%	85.6%

Payment practices

Fair payment practices are formalized in iliad's General Terms and Conditions (GTC). Due to different local regulations, payment practices vary in each of the Group's countries of operation:

- in France, suppliers are paid no later than 45 days after the end of the month of the invoice, regardless of the type or size of the supplier. Specific purchase conditions can be applied to smaller companies on a case-by-case basis to allow for faster payment of invoices;
- in Poland, payment practices are characterized by a standard 30-day payment term for most contracts. For new entities, payment terms are 60-90 calendar days from the date of receipt of the invoice if the creditor is a large enterprise applying comparable payment terms in transactions with other business partners, and 45-60 calendar days from the date of receipt of the invoice if the creditor is a micro, small, or medium-sized enterprise;
- in Italy suppliers are paid no later than 60 days after the end of the month of the invoice, regardless of the type or size of the supplier.

G1-3 – Prevention and detection of corruption and bribery

Supported by the Anti-Corruption Code of Conduct outlined in G1-1, iliad has implemented a comprehensive compliance program to prevent, detect, and address corruption and bribery within the Group (cf. corruption and bribery risks, IRO 19). This program, which includes a risk assessment process, and continuous training, aligns with our zero-tolerance stance on corruption. Additionally, a robust whistleblowing system ensures that ethical business conduct remains a top priority, enabling the prompt reporting and resolution of potential violations.

Overview of procedures to prevent, detect, and address corruption and bribery

Iilad has established a compliance program designed to prevent, detect, and sanction any corrupt activities within the Group. It is built on a comprehensive risk assessment process and supported by a dedicated compliance function.

Initially introduced in 2018 by the Group General Counsel, the program was strengthened with the appointment of an "Ethics & Compliance" officer. In 2022, iliad further reinforced its commitment by creating the position of Chief Risk, Audit, and Compliance Officer, reporting to both the Finance Department and the Group General Counsel. Since then, tailored compliance programs for specific activities, such as network rollout, and certain Group entities were implemented.

Aligned with a zero-tolerance policy on corruption and bribery, iliad has developed a comprehensive framework to mitigate these risks. This includes detailed anti-corruption risk mapping, targeted mitigation measures (as outlined in iliad's key policies), and continuous training. Monitoring mechanisms ensure policy adherence, while a dedicated whistleblowing system allows employees and external collaborators to report misconduct (see Whistleblowing Protection in Section G1-1). Additionally, rigorous third-party evaluations help assess corruption risks, reinforcing iliad's commitment to ethical business practices.

The table summarizes our key procedures addressing breaches in anti-corruption and anti-bribery procedures.

Key Actions	Objective	Scope	Horizon	Progress	Resource
Corruption Risk Mapping	To identify, evaluate, prioritize, and manage corruption risks	Conducted at all levels within the Group	Continuous process	Develop a structured tool for risk management and corrective actions	Collaboration with activity representatives for risk assessment
Anti-Corruption Measures including Training Program	To prevent non-compliance with anti-corruption regulations and train employees	Group-wide and all employees	Ongoing, with regular updates	Implemented anti-corruption training programs, continuous monitoring	Training programs in face-to-face and online, availability of documentation in physical and digital formats
Ethical Alert Mechanism	To enable reporting and addressing of unethical behavior	Available to all employees and external collaborators	Ongoing	Enhanced protection for whistleblowers, compliance with local regulations	Online platform for reporting, aligned with Waserman law and international subsidiaries
Third-Party Evaluation Procedure	To assess and manage corruption risks associated with third-party relationships	All third-party engagements	Ongoing	Regular updates and assessments conducted	Risk, audit, and Compliance Department

Anti-corruption and bribery training

In line with G1-1 "Training Programs", the iliad Group provides continuous training and awareness programs on the Code of Ethics, the Anti-Corruption Code, and related compliance policies. Indeed, a key pillar of iliad's approach is anti-corruption and bribery training, ensuring employees uphold the highest integrity standards. This program includes mandatory e-learning, in-person sessions, and specialized training for employees in roles with higher exposure to corruption risks. Training content is regularly updated to reflect the Group's risk mapping and operational challenges, incorporating real-world case studies and practical scenarios. The program is applied consistently across all iliad entities, with local adaptations in France, Italy, and Poland.

Communication and accessibility of anti-corruption policies

Anti-corruption and bribery policies are communicated through a comprehensive strategy accessible to all stakeholders. Key documents, such as the Code of Ethics, the Anti-Corruption Code, and all related documentation and policies, are distributed to all employees and accessible online. This documentation is initially given to them on the day they start working with the Group, either in physical format, by email, or via their employment contract which explicitly states that the Code of Ethics is included in their Company's internal rules. It can also be viewed and downloaded at any time on the Group's corporate website and intranet. An Ethics & Compliance section is available in French and English on the Group's corporate website and its intranet portal. It always gives all employees access to ethics policies and procedures. The strategy is implemented uniformly across all entities, including subsidiaries like iliad Italia and Play. Internal procedures and communications are regularly updated and shared with employees to maintain continuous awareness.

Monitoring, evaluation, and reporting mechanisms

The Group's corruption risk mapping process consists of identifying, assessing, prioritizing and managing the corruption risks inherent in its activities. It involves analyzing business processes at all levels of the Group. This means that corruption risks are identified and assessed in consultation with representatives of the activities concerned. This map is a guide for the Group's Executive Management when drawing up the compliance program. It also helps to guarantee that the Compliance Program is suited, proportionate and effective. Taking the form of structured documentation, the corruption risk map provides an overview of internal and external corruption risks for everyone involved in implementing the related corrective measures, including members of the Ethics Committee and the CEOs of the Group's subsidiaries.

Oversight and compliance with regulatory frameworks

The compliance program is overseen by the Ethics and Compliance Service. The program aligns with regulatory frameworks in France and Italy, including the 'Sapin 2' law and the Italian Legislative Decree No. 231. The training content is regularly updated to reflect changes in regulatory environments and the iliad Group's internal policies. The Ethics and Compliance Service supports transparency and ethical behavior, ensuring that the program reflects the Group's commitment to integrity and ethical business conduct.

Metrics and targets

G1-4 – Incidents of corruption or bribery

The iliad Group maintains a strong commitment to anti-corruption and anti-bribery compliance, with no reported violations, fines, or confirmed incidents in the past five years. There have been no cases of corruption or bribery leading to employee dismissals, disciplinary actions, or contract terminations with business partners.

It shall be noted that following each investigation into potential breaches of anti-corruption and anti-bribery procedures, the Ethics & Compliance team issues detailed recommendations to mitigate identified risks and strengthen internal controls. Depending on the severity of the breach, corrective actions may include updates to compliance policies, additional training for relevant employees, or enhancements to monitoring mechanisms. In cases where violations are confirmed, appropriate disciplinary measures are enforced in accordance with the Group's internal regulations. These measures ensure that the iliad Group maintains a strong culture of integrity and accountability while continuously improving its compliance framework.

For further details on the actions taken by the iliad Group to address breaches of anti-corruption and anti-bribery procedures, refer to G1-1 and G1-3.

A key pillar to the Group is to ensure that employees acknowledge and adhere to the Codes of Conduct. From 2020 to 2022, the acknowledgment rate remained at 100%, with a slight dip to 91.7% in 2023 before recovering to 99.8% in 2024, reflecting ongoing efforts to reinforce ethical business practices.

	2020	2021	2022	2023	2024
% employees' acknowledgement of the codes of conduct	100%	100%	100%	91.7%	99.8%

	2024
Percentage of functions-at-risk covered by training programmes	100%

In 2024, 100% of employees in high-risk functions (cf. G1-3) completed dedicated anti-corruption and bribery training, ensuring full compliance and risk mitigation.

G1-5 – Political influence and lobbying activities

The Group's lobbying activities are conducted with full transparency and align with its strategic objectives while ensuring compliance with applicable regulations. This section outlines the governance framework overseeing political engagement, the Group's lobbying priorities and key indicators.

The Double Materiality Assessment (DMA) identified "Infrastructure investment and market expansion through political engagement" as a material IRO, highlighting the importance of political engagement for navigating regulatory landscapes and securing necessary approvals.

Oversight of political influence and lobbying activities

The iliad Group's administrative, management, and supervisory bodies have designated specific representatives responsible for overseeing political influence and lobbying activities. This oversight is essential for ensuring transparency, compliance with regulatory requirements, and alignment with the Company's strategic objectives.

The following individuals are responsible for managing these efforts across our regions:

France

- **Ombeline Bartin**, the Director of Public Affairs, is tasked with managing the Company's interactions and engagements with public entities and stakeholders. Her role involves coordinating public affairs strategies and ensuring alignment with regulatory and legislative developments;
- **Maxime Lombardini**, the Vice-President, provides guidance and influences the direction of the Company's lobbying efforts, ensuring they align with the Group's overall objectives;
- **Laurent Laganier**, the Director of Regulation, plays a crucial role in navigating the regulatory landscape. He ensures that the Company's lobbying activities comply with relevant laws and standards;
- **Ingrid Malfait-Guilbaud**, the Director of European Affairs, focuses on managing the Company's lobbying activities at the European level, ensuring that iliad's interests are represented in EU policy discussions;
- **Alexandre Durand**, responsible for Public Affairs, supports the coordination and execution of lobbying strategies across various levels of government.

Poland

- **Małgorzata Zakrzewska**, the Chief Corporate Affairs Officer of Play, Executive Committee Member. She is responsible for the whole Corporate Affairs area including Public Affairs and ESG, and is the highest company representative in the industry chambers and business organizations and towards multiple governmental, political and regulatory stakeholders;
- **Jan Pilewski**, the Director of Public Affairs, is tasked with managing Play's interactions and engagements with public entities, stakeholders, NGOs. His role involves coordinating public affairs strategies and ensuring alignment with regulatory and legislative developments at country level;
- **Przemysław Frasunek**, founder and CEO of Redge Technologies, is a leading voice in cybersecurity debates in Poland, contributing to discussions that shape industry standards and influence legislation.

Italy

- **Tiziana Talevi**, as Director of Regulation & Competition, interacts with her team, with regulatory bodies to ensure a favourable regulatory environment to support iliad Italia growth in line with relevant laws and standards;
- **Michele Rillo**, is the Chief of Staff and External Affairs Director. He oversees Public Affairs and Corporate Communication strategy at iliad Italia. Together with his team, he is responsible for strengthening the institutional and brand perception of the Company to support iliad's strategic positioning;
- **Emmanuel Olivieri**, Public Affairs Manager, defines and supports the implementation of the public affairs strategy. He's responsible of Public Affairs Team and for the relationship with institutional stakeholders at central and local level.

Lobbying priorities in telecommunications and digital policy

The iliad Group's lobbying activities focus on several key areas within the telecommunications and digital sectors. These include:

- **Telecommunications infrastructure**: iliad advocates for the development and the evolution of the regulatory framework of telecommunications infrastructure, including the deployment of 4G/5G networks and the allocation of new frequency bands. Another focus is also put on ensuring operational continuity during crises, such as the Covid-19 pandemic, and balance the taxation related to relay antennas;
- **Digital and internet access**: The Group is involved in legislative efforts to improve access to Internet services and telecommunications networks. This includes advocating for regulatory changes that facilitate access to digital content while protecting cultural works;
- **Audiovisual and media regulation**: iliad is engaged in shaping laws related to audiovisual regulation, aiming to ensure balanced content distribution and address media concentration in France. They seek to adapt regulations to the digital distribution landscape;
- **Public finances**: iliad promotes a competitive cloud market and advocates for fiscal measures such as capping fixed network taxes;
- **Environmental impact of digital activities**: The Group is involved in discussions about the environmental footprint of digital activities, seeking to influence policies that address the impact of telecommunications;
- **Data retention and privacy**: iliad is working on establishing a new regime for the retention of connection data, aligning with broader European directives on electronic communications;
- **IP rights protection**: iliad advocates for protecting intellectual property rights in the audiovisual sector, ensuring creators are fairly compensated. The Group takes action to combat unauthorized distribution and digital infringement;

- **Cybersecurity**: iliad is dedicated to protecting telecommunications infrastructure from cyberattacks and unauthorized access by promoting industry standards and adopting advanced technologies.

Alignment with public statements

The iliad Group's public statements consistently reflect their lobbying activities, emphasizing the importance of infrastructure development, digital access, and balanced media regulation. This alignment ensures transparency and coherence between the Group's declared objectives and their lobbying efforts.

The iliad Group and its subsidiaries are registered in the following transparency register:

- EU Transparency register – Reg. number: 173343238166-37;
- HATPV (Haute Autorité Pour La Vie Publique)- Org. number: 342376332;
- Poland: Lobbying is regulated but Play is not on the parliament lobbying register;
- Italy: iliad Italia S.p.A. voluntarily registerd in:
  - transparency Register of the Ministry of Enterprises and Made in Italy (MIMIT) – Reg. number: 2024-1720795518883-27 (since July 12, 2024),
  - register of Interest Representatives of the Chamber of Deputies – No reg. number is assigned (since 2 February, 2024).

Disclosure on appointment of members with public administration experience

Free, Play, and iliad Italy have not appointed any members to their administrative, management, or supervisory bodies who previously held a comparable position in public administration, within the two years preceding their appointment during the current reporting period.

Key indicator

The table highlights the iliad Group's commitment to transparency in political engagement, showing that while the Company invests in lobbying efforts, it does not make financial or in-kind political contributions.

All data *(in euros)*	**2024**
Financial political contributions made	0
Amount of internal and external lobbying expenses	908,141
Amount paid for membership to lobbying associations	272,055
In-kind political contributions made	0
Total spending on influence: total spending of the Company on lobbying, political campaigns, political organizations and trade associations.	**1,180,197**

G1-6 – Payment practices

Regarding payment practices and payment delays, key indicators have been assessed (details of payment practices are highlighted in the G1-2 section). This data reflects the Group's commitment to maintaining transparent and timely payment practices.

	2024
Average number of days to pay invoice from date when contractual or statutory term of payment starts to be calculated	43
Percentage of payments aligned with standard payment terms	70%
Number of outstanding legal proceedings for late payments	0

Furthermore, to perform those calculations, key hypothesis have been taken. For payment delay estimates:

- average for payment delay is computed based on number of invoices;
- an invoice is considered overdue after the first day following the due date. Invoices issued in 2024 and paid the same year have been considered;
- entities with less than 2% of overall turnover have not been considered;
- figures are currently available at overall level – not by counterparty sub-types – due to ongoing roll out of new suppliers' systems. However, iliad's Finance Team aims to obtain this level of detail in the coming years;
- for internal reasons, a significant proportion of invoices in Poland has not been taken into consideration (65% of all invoices).

4.11 Appendices

Appendix A – IRO 2: Disclosure of list of data points that derive for other EU legislation

The table below contains all disclosure requirements and related data points originating from other EU legislation as set out in Annex B of ESRS 2, indicating where the data points can be found in the annual report and which data points are assessed as non-material.

Disclosure Requirement	Related datapoint	SFDR	Pillar 3	Benchmark Regulation	Climate Law	Material/ Non-material	Section
ESRS 2 GOV-1	Board's gender diversity paragraph 21(d)	X		X		Material	GOV-1 The role of the administrative, management and supervisory bodies
ESRS 2 GOV-1	Percentage of board members who are independent paragraph 21(e)			X		Material	GOV-1 The role of the administrative, management and supervisory bodies
ESRS 2 GOV-4	Statement on due diligence paragraph 30	X				Material	GOV-4 Statement on due diligence
ESRS 2 SBM-1	Involvement in activities related to fossil fuel activities paragraph 40(d) i	X	X	X		Non-material	
ESRS 2 SBM-1	Involvement in activities related to chemical production paragraph 40(d) ii	X		X		Non-material	
ESRS 2 SBM-1	Involvement in activities related to controversial weapons paragraph 40(d) iii	X		X		Non-material	
ESRS 2 SBM-1	Involvement in activities related to cultivation and production of tobacco paragraph 40(d) iv			X		Non-material	
ESRS E1-1	Transition plan to reach climate neutrality by 2050 paragraph 14				X	Material	E1-1 Transition plan for climate change mitigation
ESRS E1-1	Undertakings excluded from Paris-aligned Benchmarks paragraph 16(g)		X	X		Non-material	E1-1 Transition plan for climate change mitigation
ESRS E1-4	GHG emission reduction targets paragraph 34	X	X	X		Material	E1-4 Targets related to climate change mitigation and adaptation

Disclosure Requirement	Related datapoint	SFDR	Pillar 3	Benchmark Regulation	Climate Law	Material/ Non-material	Section
ESRS E1-5	Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) paragraph 38	X				Non-material	
ESRS E1-5	Energy consumption and mix paragraph 37	X				Material	E1-5 Energy consumption and mix
ESRS E1-5	Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43	X				Non-material	
ESRS E1-6	Gross Scope 1, 2, 3 and Total GHG emissions paragraph 44	X	X	X		Material	E1-6 Gross Scopes 1, 2, 3 and Total GHG emissions
ESRS E1-6	Gross GHG emissions intensity paragraphs 53 to 55	X	X	X		Material	E1-6 Gross Scopes 1, 2, 3 and Total GHG emissions
ESRS E1-7	GHG removals and carbon credits paragraph 56				X	Material	E1-7 GHG removals and GHG mitigation projects financed through carbon credits
ESRS E1-9	Exposure of the benchmark portfolio to climate-related physical risks paragraph 66			X		Material	E1-9 Anticipated financial effects from material physical and transition risks and potential climate-related opportunities
ESRS E1-9	Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66(a)		X			Material	E1-9 Anticipated financial effects from material physical and transition risks and potential climate-related opportunities
ESRS E1-9	Location of significant assets at material physical risk paragraph 66(c)		X			Material	E1-9 Anticipated financial effects from material physical and transition risks and potential climate-related opportunities

Disclosure Requirement	Related datapoint	SFDR	Pillar 3	Benchmark Regulation	Climate Law	Material/ Non-material	Section
ESRS E1-9	Breakdown of the carrying value of its real estate assets by energy-efficiency classes paragraph 67(c)		X			Material	E1-9 Anticipated financial effects from material physical and transition risks and potential climate-related opportunities
ESRS E1-9	Degree of exposure of the portfolio to climate- related opportunities paragraph 69			X		Material	E1-9 Anticipated financial effects from material physical and transition risks and potential climate-related opportunities
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				Non-material	
ESRS E3-1	Water and marine resources paragraph 9	X				Material	E3-1 Policies related to water and marine resources
ESRS E3-1	Dedicated policy paragraph 13	X				Material	E3-1 Policies related to water and marine resources
ESRS E3-1	Sustainable oceans and seas paragraph 14	X				Material	E3-1 Policies related to water and marine resources
ESRS E3-4	Total water recycled and reused paragraph 28(c)	X				Material	E3-4 Water consumption
ESRS E3-4	Total water consumption in m^3 per net revenue on own operations paragraph 29	X				Material	E3-4 Water consumption
ESRS 2-SBM 3 – E4	paragraph 16(a) i	X				Non-material	
ESRS 2-SBM 3 – E4	paragraph 16(b)	X				Non-material	
ESRS 2-SBM 3 – E4	paragraph 16(c)	X				Non-material	
ESRS E4-2	Sustainable land/agriculture practices or policies paragraph 24(b)	X				Non-material	

Disclosure Requirement	Related datapoint	SFDR	Pillar 3	Benchmark Regulation	Climate Law	Material/ Non-material	Section
ESRS E4-2	Sustainable oceans/ seas practices or policies paragraph 24(c)	X				Non-material	
ESRS E4-2	Policies to address deforestation paragraph 24(d)	X				Non-material	
ESRS E5-5	Non-recycled waste paragraph 37(d)	X				Material	E5-5 Resource outflows
ESRS E5-5	Hazardous waste and radioactive waste paragraph 39	X				Material	E5-5 Resource outflows
ESRS 2-SBM3 – S1	Risk of incidents of forced labour paragraph 14(f)	X				Material	S1 SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model
ESRS 2-SBM3 – S1	Risk of incidents of child labour paragraph 14(g)	X				Material	S1 SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model
ESRS S1-1	Human rights policy commitments paragraph 20	X				Material	S1-1 Policies related to own workforce
ESRS S1-1	Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 21			X		Material	S1-1 Policies related to own workforce
ESRS S1-1	Processes and measures for preventing trafficking in human beings paragraph 22	X				Material	S1-1 Policies related to own workforce
ESRS S1-1	Workplace accident prevention policy or management system paragraph 23	X				Material	S1-1 Processes to remediate negative impacts and channels for own workforce to raise concerns

Disclosure Requirement	Related datapoint	SFDR	Pillar 3	Benchmark Regulation	Climate Law	Material/ Non-material	Section
ESRS S1-3	Grievance/complaints handling mechanisms paragraph 32(c)	X				Material	S1-3 Processes to remediate negative impacts and channels for own workforce to raise concerns
ESRS S1-14	Number of fatalities and number and rate of work-related accidents paragraph 88(b) and (c)	X		X		Material	S1-14 Health and safety metrics
ESRS S1-14	Number of days lost to injuries, accidents, fatalities or illness paragraph 88(e)	X				Material	S1-14 Health and safety metrics
ESRS S1-16	Unadjusted gender pay gap paragraph 97(a)	X		X		Material	S1-16 Remuneration metrics
ESRS S1-16	Excessive CEO pay ratio paragraph 97(b)	X				Material	S-16 Remuneration metrics
ESRS S1-17	Incidents of discrimination paragraph 103(a)	X				Material	S1-17 Incidents, complaints and severe human rights impacts
ESRS S1-17	Non-respect of UNGPs on Business and Human Rights and OECD Guidelines paragraph 104(a)	X		X		Material	S1-17 Incidents, complaints and severe human rights impacts
ESRS 2-SBM3 – S2	Significant risk of child labour or forced labour in the value chain paragraph 11(b)	X				Material	S2.SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model
ESRS S2-1	Human rights policy commitments paragraph 17	X				Material	S2-1 Policies related to the value chain workers
ESRS S2-1	Policies related to value chain workers paragraph 18	X				Material	S2-1 Policies related to the value chain workers
ESRS S2-1	Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19	X		X		Material	S2-1 Policies related to the value chain workers

ESRS S2	European Sustainability Reporting Standard S2 Workers in the value chain
ESRS S3	European Sustainability Reporting Standard S3 Affected communities
ESRS S4	European Sustainability Reporting Standard S4 Consumers & end-users
EFRAG	European Financial Reporting Advisory Group
ERM	Enterprise Risk Management
ESRS	European Sustainability Reporting Standards
Greenhouse Gases (GHG)	The gases listed in Part 2 of Annex V of Regulation (EU) 2018/1999 of the European Parliament and of the Council
GHG protocol	Globally recognized framework for measuring, managing, and reporting greenhouse gas emissions across organizations, value chains, and products.
HECTAR	Agricultural campus in the Chevreuse valley near Paris founded by Xavier Niel. The campus cover over 600 hectares, and has the purpose to enhance and develop the land and those who work it by cultivating knowledge and recognition
HR	Human Resources
ILO	International Labour Organisation
ISO	International Organization for Standardization
Materiality	A sustainability matter is material if it meets the definition of impact materiality, financial materiality, or both.
NACE	Statistical Classification of Economic Activities in the European Community
Net zero	Describe the state where emissions of greenhouse gases due to human activities and removals of these gases are in balance over a given period. It is often called simply net zero
OpEX	Operating Expenditure
PPAs	Power Purchase Agreements
Policy	A set or framework of general objectives and management principles that the undertaking uses for decision-making.
SBTi	Science Based Targets Initiative
SBTN	Science Based Targets Network
Scope 1 GHG emissions	Direct GHG emissions from sources that are owned or controlled by the undertaking
Scope 2 GHG emissions	Indirect emissions from the generation of purchased or acquired electricity, steam, heat or cooling consumed by the undertaking
Scope 3 GHG emissions	All indirect GHG emissions (not included in scope 2 GHG emissions) that occur in the value chain of the reporting undertaking, including both upstream and downstream emissions. 15 types of Scope 3 GHG emissions identified by the GHG Protocol Corporate Standard
Sustainability-related opportunities	Uncertain environmental, social or governance events or conditions that, if they occur, could cause a potential material positive effect on the undertaking's business model, or strategy on its capability to achieve its goals and targets and to create value
Sustainability-related risks	Uncertain environmental, social or governance events or conditions that, if they occur, could cause a potential material negative effect on the undertaking's business model or strategy and on its capability to achieve its goals and targets and to create value
Sustainability-related impacts	The effect the undertaking has or could have on the environment and people, including effects on their human rights, as a result of the undertaking's activities or business relationships
VC	Value chain
Water consumption	The amount of water drawn into the boundaries of the undertaking (or facility) and not discharged back to the water environment or a third party over the course of the reporting period
WUE	Water Usage Effectiveness

Appendix C – IRO-2: Disclosure Requirements in ESRS covered by the undertaking's sustainability statement

The table below outlines the scope of iliad's CSRD disclosure. Following the Double Materiality Assessment, E2 (pollution) and E4 (biodiversity) have been omitted due to non-materiality. iliad remains committed to disclosing all mandatory and material datapoints relevant to its activities, in alignment with EFRAG's'IG 3: List of ESRS Datapoints' document. As this is the first year of publication, disclosures are expected to improve through ongoing learning and refinement.

For information on all disclosure requirements and related data points originating from other EU legislation, as set out in Annex B of ESRS 2, please refer to Appendix A of this document.

ESRS	Disclosure requirements	Corresponding section in the sustainability statement
ESRS 2 General disclosures	BP-1	BP-1 General basis for preparation of the sustainability statement
	BP-2	BP-2 Disclosures in relation to specific circumstances
	GOV-1	GOV-1 The role of the administrative, management and supervisory bodies
	GOV-2	GOV-2 Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies
	GOV-3	GOV-3 Integration of sustainability-related performance in incentive schemes
	GOV-4	GOV-4 Statement on due diligence
	GOV-5	GOV-5 Risk management and internal controls over sustainability reporting
	SBM-1	SBM-1 Strategy, business model and value chain
	SBM-2	SBM-2 Interests and views of stakeholders
	SBM-3	SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model
	IRO-1	IRO-1 Description of the process to identify and assess material impacts, risks and opportunities
	IRO-2	Appendices IRO-2 Disclosure Requirements in ESRS covered by the undertaking's sustainability statement
ESRS E1 Climate change	ESRS 2 GOV-3	E1 GOV-3 Integration of sustainability-related performance in incentive schemes
	E1-1	E1-1 Transition plan for climate change mitigation
	ESRS 2 SBM-3	E1.SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model
	ESRS 2 IRO-1	E1.IRO-1 Description of the processes to identify and assess material climate- related impacts, risks and opportunities
	E1-2	E1-2 Policies related to climate change mitigation and adaptation
	E1-3	E1-3 Actions and resources in relation to climate change policies
	E1-4	E1-4 Targets related to climate change mitigation and adaptation
	E1-5	E1-5 Energy consumption and mix
	E1-6	E1-6 Gross Scopes 1, 2, 3 and Total GHG emissions
	E1-7	E1-7 GHG removals and GHG mitigation projects financed through carbon credits
	E1-8	E1-8 Internal carbon pricing
	E1-9	E1-9 Anticipated financial effects from material physical and transition risks and potential climate-related opportunities
ESRS E2 Pollution		Not Material
ESRS E3 Water and marine resources	ESRS 2 IRO-1	E3.IRO-1 Description of the processes to identify and assess material water and marine resources-related impacts, risks and opportunities
	E3-1	E3-1 Policies related to water and marine resources
	E3-2	E3-2 Actions and resources related to water and marine resources
	E3-3	E3-3 Targets related to water and marine resources
	E3-4	E3-4 Water consumption

ESRS	Disclosure requirements	Corresponding section in the sustainability statement
ESRS E4 Biodiversity and Ecosystems		Not Material
ESRS E5 Resource use and circular economy	ESRS 2 IRO-1	E5.IRO-1 Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities
	E5-1	E5-1 Policies related to resource use and circular economy
	E5-2	E5-2 Actions and resources related to resource use and circular economy
	E5-3	E5-3 Targets related to resource use and circular economy
	E5-4	E5-4 Resource inflows
	E5-5	E5-5 Resource outflows
ESRS S1 Own workforce	ESRS 2 SBM-2	S1.SBM-2 Interests and views of stakeholders
	ESRS 2 SBM-3	S1.SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model
	S1-1	S1-1 Policies related to own workforce
	S1-2	S1-2 Processes for engaging with own workforce and workers' representatives about impacts
	S1-3	S1-3 Processes to remediate negative impacts and channels for own workforce to raise concerns
	S1-4	S1-4 Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions
	S1-5	S1-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities
	S1-6	S1-6 Characteristics of the undertaking's employees
	S1-8	S1-8 Collective bargaining coverage and social dialogue
	S1-9	S1-9 Diversity metrics
	S1-10	S1-10 Adequate wages
	S1-11	S1-11 Social protection
	S1-12	S1-12 Persons with disabilities
	S1-13	S1-13 Training and skills development metrics
	S1-14	S1-14 Health and safety metrics
	S1-15	S1-15 Work-life balance metrics
	S1-16	S1-16 Remuneration metrics
	S1-17	S1-17 Incidents, complaints and severe human rights impacts
ESRS S2 Workers in the value chain	ESRS 2 SBM-3	S2.SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model
	S2-1	S2-1 Policies related to value chain workers
	S2-2	S2-2 and S2-3 Processes for engaging with value chain workers about impacts and raise concerns
	S2-3	S2-2 and S2-3 Processes for engaging with value chain workers about impacts and raise concerns
	S2-4	S2-4 Taking action on material impacts on value chain worker
	S2-5	S2-5 Targets related to managing material impacts, risks and opportunities

ESRS	Disclosure requirements	Corresponding section in the sustainability statement
ESRS S3 Affected communities	ESRS 2 SBM-3	S3.SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model
	S3-1	S3-1 Policies related to affected communities
	S3-2	S3-2 and S3-3 Processes to engage with affected communities and channels for affected communities to raise concerns
	S3-3	S3-2 and S3-3 Processes to engage with affected communities and channels for affected communities to raise concerns
	S3-4	S3-4 Taking action on material impacts on affected communities
	S3-5	S3-5 Targets and metrics advancing positive impact
ESRS S4 Consumers and end-users	ESRS 2 SBM-3	S4.SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model
	S4-1	S4-1 and S4-4 Policies and actions related to consumers and end-users
	S4-2	S4-2 and S4-3 Processes for engaging with Consumers and End-Users and remediating their concerns
	S4-3	S4-2 and S4-3 Processes for engaging with Consumers and End-Users and remediating their concerns
	S4-4	S4-1 and S4-4 Policies and actions related to consumers and end-users
	S4-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities
ESRS G1 Business conduct	ESRS 2 GOV-1	G1. GOV-1 The role of the administrative, management and supervisory bodies
	G1-1	G1-1 Business conduct policies and corporate culture
	G1-2	G1-2 Management of relationships with suppliers
	G1-3	G1-3 Prevention and detection of corruption and bribery
	G1-4	G1-4 Incidents of corruption or bribery
	G1-5	G1-5 Political influence and lobbying activities
	G1-6	G1-6 Payment practices

4.12 Report on the certification of sustainability information provided by iliad and verification of the disclosure requirements under Article 8 of Regulation (EU) 2020/852

(For the year ended December 31, 2024)

This is a translation into English of the Statutory Auditor's 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".

To the Shareholders of iliad,

This report is issued in our capacity as Statutory Auditor of iliad. It covers the sustainability information and the information required by Article 8 of Regulation (EU) 2020/852, relating to the financial year ended December 31, 2024 and included in Chapter 4 of the Group's management report (hereinafter the "Sustainability Statement").

Pursuant to Article L.233-28-4 of the French Commercial Code (*Code de commerce*), iliad is required to include the abovementioned information in a separate section of the Group's management report. This information has been prepared in the context of the first-time application of the aforementioned articles, a context characterized by uncertainties regarding the interpretation of the legal texts, the use of significant estimates, the absence of established practices and frameworks, in particular for the double materiality assessment, and an evolving internal control system. It provides an understanding of the impact of iliad's activity on sustainability matters, as well as the way in which these matters influence the development of its business, performance and position. Sustainability matters include environmental, social and corporate governance matters.

Pursuant to II of Article L.821-54 of the aforementioned Code, our responsibility is to carry out the procedures necessary to issue a conclusion, expressing limited assurance, on:

- compliance with the sustainability reporting standards adopted pursuant to Article 29 *ter* of Directive (EU) 2013/34 of the European Parliament and of the Council of December 14, 2022 (hereinafter ESRS for European Sustainability Reporting Standards) of the process implemented by iliad to determine the information reported, and compliance with the requirement to consult the social and economic committee provided for in the sixth paragraph of Article L.2312-17 of the French Labour Code (*Code du travail*);
- compliance of the sustainability information included in the Sustainability Statement with the requirements of Article L.233-28-4 of the French Commercial Code, including with the ESRS; and
- compliance with the requirements set out in Article 8 of Regulation (EU) 2020/852.

This engagement is carried out in compliance with the ethical rules, including those on independence, and quality control, prescribed by the French Commercial Code.

It is also governed by the H2A guidelines on limited assurance engagements on the certification of sustainability information and verification of disclosure requirements set out in Article 8 of Regulation (EU) 2020/852.

In the three separate parts of the report that follow, we present, for each of the parts covered by our engagement, the nature of the procedures we carried out, the conclusions we drew from these procedures and, in support of these conclusions, the elements to which we paid particular attention and the procedures we carried out with regard to these elements. We draw your attention to the fact that we do not express a conclusion on any of these elements taken in isolation and that the procedures described should be considered in the overall context of the formation of the conclusions issued in respect of each of the three parts of our engagement.

Finally, where it was deemed necessary to draw your attention to one or more items of sustainability information provided by iliad in the Group's management report, we have included an emphasis of matter paragraph hereafter.

The limits of our engagement

As the purpose of our engagement is to provide limited assurance, the nature (choice of techniques), extent (scope) and timing of the procedures are less than those required to obtain reasonable assurance.

Furthermore, this engagement does not provide a guarantee regarding the viability or the quality of the management of iliad; in particular, it does not provide an assessment of the relevance of the choices made by iliad in terms of action plans, targets, policies, scenario analyses and transition plans, that extends beyond compliance with the ESRS reporting requirements.

It does, however, allow us to express conclusions regarding the process for determining the sustainability information to be reported, the sustainability information itself, and the information reported pursuant to Article 8 of Regulation (EU) 2020/852, as to the absence of identification or, on the contrary, the identification of errors, omissions or inconsistencies of such importance that they would be likely to influence the decisions that readers of the information subject to this engagement might make.

Our engagement does not cover any comparative data.

Compliance with the ESRS of the process implemented by iliad to determine the information reported, and compliance with the requirement to consult the social and economic committee provided for in the sixth paragraph of Article L.2312-17 of the French Labor Code,

Nature of the procedures carried out

Our procedures consisted in verifying that:

- the process defined and implemented by iliad 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 are disclosed in the Sustainability Statement; and
- the information provided on this process also complies with the ESRS.

We also checked compliance with the requirement to consult the social and economic committee.

Conclusion of the procedures carried out

On the basis of the procedures we have carried out, we have not identified any material errors, omissions or inconsistencies regarding the compliance of the process implemented by iliad with the ESRS.

Concerning the consultation of the social and economic committee provided for in the sixth paragraph of Article L.2312-17 of the French Labor Code, we inform you that at the date of this report this consultation has not yet taken place.

Elements that received particular attention

The elements to which we paid particular attention concerning the compliance with the ESRS of the process implemented by iliad to determine the information reported are presented below.

Information relating to the identification of stakeholders and impacts, risks and opportunities as well as to the assessment of impact materiality and financial materiality is given in the section "IRO-1 – Description of processes to identify and assess material impacts, risks and opportunities" of the Sustainability Statement.

- **Concerning the identification of stakeholders**

We reviewed the analysis carried out by iliad to identify the stakeholders who may affect the entities included in the scope of information, or may be affected by them, through their activities and direct or indirect business relationships in the value chain.

We spoke to management and other persons we deemed appropriate and inspected the documentation available. Our audit procedures mainly consisted in:

- assessing the consistency of the main stakeholders identified by iliad with the nature of its activities and its geographical location, taking into account its business relationships and value chain;
- assessing the appropriateness of the description given in the section "SBM-2 – Interests and views of stakeholders" of the Sustainability Statement.

- **Concerning the identification of impacts, risks and opportunities**

We reviewed the entity's process implemented for identifying actual or potential impacts (negative or positive), risks and opportunities ("IROs") in relation to the sustainability matters set out in paragraph AR 16 of the "Application Requirements" of ESRS 1, as presented in paragraph "SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model" of the Sustainability Statement.

In particular, we assessed the approach taken by iliad to determine its impacts and dependencies, which may be a source of risks or opportunities, including any stakeholder engagement undertaken.

We reviewed iliad's analysis of the IROs identified, including a description of their distribution within the Group's own operations and value chain, as well as their time horizon (short, medium or long term), and assessed the consistency of this analysis with our knowledge of the entity and, where applicable, with the risk analyses carried out by Group entities.

We assessed:

- the approach used by iliad to gather information on subsidiaries;
- the way in which iliad considered the list of sustainability topics listed in ESRS 1 (AR 16) in its assessment;
- the consistency of actual and potential impacts, risks and opportunities identified by iliad with available sectoral analyses;
- whether iliad 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.

- **Concerning the assessment of impact materiality and financial materiality**

Through interviews with management and the Corporate Social Responsibility Department and inspection of the available documentation, we obtained an understanding of the impact materiality and financial materiality assessment process implemented by iliad, and assessed its compliance with the criteria defined by ESRS 1.

In particular, we assessed:

- the consistency of the thresholds thus determined with our knowledge of the entity;
- that all actual or potential impacts, risks and opportunities identified by iliad have been assessed;
- the appropriateness of the level of aggregation of subsidiaries' impacts, risks and opportunities at Group level;
- whether the entity has evaluated IROs independently of any mitigation measures;
- the appropriateness of the information given in the section "IRO-1 – Description of processes to identify and assess material impacts, risks and opportunities" of the Sustainability Statement.

Compliance of sustainability information included in the Sustainability Statement with the requirements of Article L.233-28-4 of the French Commercial Code, including with the ESRS.

Nature of the procedures carried out

Our procedures consisted in verifying that, in accordance with legal and regulatory requirements, including the ESRS:

- the disclosures provided provide an understanding of the general basis for the preparation and governance of the sustainability information included in the Sustainability Statement, including the general 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 iliad for providing this information is appropriate; and
- on the basis of a selection, based on our analysis of the risks of non-compliance of the information provided and the expectations of users, this information does not contain any material errors, omissions or inconsistencies, i.e., that are likely to influence the judgment or decisions of the 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 requirements of Article L.233-28-4 of the French Commercial Code, including the ESRS.

Emphasis of matter

Without qualifying the conclusion expressed above, we draw your attention to the information given in the sections "BP-1 – General basis for preparation of the sustainability statement" and "BP-2 – Disclosures in relation to specific circumstances" of the Sustainability Statement describing the methodological limitations (including scope limitations), estimates and uncertainties in the context of the first-time application of Article L.233-28-4 of the French Commercial Code.

Elements that received particular attention

- **Information provided in application of the ESRS E1 environmental standard**

Information on climate change (ESRS E1) in disclosed in the section "E1 – Climate change" of the Sustainability Statement.

The elements to which we paid particular attention concerning the compliance of this information with the ESRS are presented below.

- Our audit procedures mainly consisted in:
  - assessing, based on interviews with management or the persons concerned, whether the description of the policies, actions and targets implemented by iliad covers the following areas: climate change mitigation, climate change adaptation;
  - assessing the appropriateness of the information presented in section "E1 – Climate change" of the Sustainability Statement, and its overall consistency with our knowledge of the entity.
- with regard to the information reported on greenhouse gas emissions:
  - we assessed the consistency of the scope used to assess greenhouse gas emissions with the scope of the consolidated financial statements, entities under operational control and the upstream and downstream value chain;
  - we reviewed the greenhouse gas emissions inventory protocol used by the entity to draw up its greenhouse gas emissions statement, and we assessed how it was applied to a selection of emissions categories and sites, for Scopes 1 and 2;
  - we assessed the appropriateness of the emission factors used and the calculation of the relevant conversions, as well as the calculation and extrapolation assumptions, taking into account the inherent uncertainty related to the state of scientific or economic knowledge and the quality of the external data used;
  - for physical data (such as energy consumption), we reconciled the underlying data used to draw up the greenhouse gas emissions statement, together with the supporting documents, using sampling techniques;
  - with regard to the estimates we considered to be structural that were used by the entity to determine its greenhouse gas emissions inventory:

- on the basis of interviews with management, we reviewed the method used to calculate the estimated data and the sources of information on which these estimates are based,
- we assessed whether the methods have been applied consistently or whether there have been any changes since the previous period, and whether these changes are appropriate.

- **Information provided in application of the ESRS S1 social standard**

The information reported for iliad's own workforce (ESRS S1) is presented in section "S1 – Policies related to own workforce" of the Sustainability Statement.

The elements to which we paid particular attention concerning the compliance of this information with the ESRS are presented below.

Our audit procedures mainly consisted in:

- on the basis of interviews with the human resources departments of the main countries (France, Poland and Italy) or with the persons concerned, assessing whether the description of the policies and actions implemented by iliad covers the areas of health and safety;
- for metrics characteristic of the Company's employees, such as the breakdown of the workforce by type of contract and gender, and diversity:
  - reviewing the methodology used to draw up these metrics,
  - assessing the coherence of the scope under consideration;
- checking the mathematical accuracy of the calculations used to determine this information.

Compliance with the reporting requirements set out in Article 8 of Regulation (EU) 2020/852

Nature of the procedures carried out

Our procedures consisted in verifying the process implemented by iliad to determine the eligible and aligned nature of the activities of the entities included in the scope of consolidation.

They also involved verifying the information reported pursuant to Article 8 of Regulation (EU) 2020/852, which involves checking:

- compliance with the rules governing 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 judgment or decisions of users of this information.

Conclusion of the procedures carried out

Based on the procedures we have carried out, we have not identified any material errors, omissions or inconsistencies in relation to compliance with the requirements of Article 8 of Regulation (EU) 2020/852.

Elements that received particular attention

We established that there were no such elements to address in our report.

Paris-La Défense, April 22, 2025

The Statutory Auditor

Deloitte & Associés
Ariane BUCAILLE

iliad.fr