



The development of the France Telecom Orange Group as an international group is based on the implementation of a consistent worldwide set of values, principles, standards, rules and guidelines in favour of better actions, decisions and behaviour regarding the respect of people (including in particular clients, employees and stakeholders) and the environment.

The corporate responsibility approach is at the core of the France Telecom Orange Group strategy. France Telecom Orange has the firm conviction that information technologies and communication play a key role in sustainable development. For the France Telecom Orange Group, to be a responsible company means even more than economic performance, social progress and preservation of the environment. It is to innovate, to develop sustainable products and services, accessible to the majority, which improve the convenience and daily lives of our customers while helping them face the challenge of sustainable development in their personal and professional lives.

France Telecom Orange is convinced that corporate social responsibility is an element of success for the future of the France Telecom Orange Group. The France Telecom Orange Group approach, which consists in taking into account the requirements related to the sustainable development in our corporate strategy, allows the France Telecom Orange Group to better monitor inherent risks in our activity, while optimizing our processes and its internal modes of organization in order to reduce our environmental footprint.

‘France Telecom Orange Group defines Corporate Social Responsibility as its ability to provide consistent and sustainable answers to the expectations of our stakeholders in the economic, social and environmental domains, and to create social links for everyone’s benefit.’

It is a key point for the improvement of our global performance and value creation, in addition to being a moral commitment.

For nearly 15 years, the France Telecom Orange Group's strategy has integrated corporate responsibility matters. Beyond the signature of the **ETNO** (European Telecommunication Network Operators), environment charter (1996), and of the UN's Global Compact (July 2000), the France Telecom Orange Group also contributes to several initiatives to promote sustainable development ideas in the telecom sector, partnering with :

- **GeSI** (Global eSustainability Initiative), international organization which brings together operators and equipment manufacturers across the globe, with an aim to promote sustainable development within the telecommunications sector;
- **MPPI** (Mobile Phone Partnership Initiative), which includes the principal manufacturers and certain operators to improve the treatment of used mobile phones;
- **EEIOCG** (Energy Efficiency Inter-Operator Collaboration Group), which strives for environmental friendly information and communication technologies;
- the European Framework for **Safer Mobile Use** by Younger Teenagers and Children;
- the **Mobile Alliance Against Child Sexual Abuse Content**.

In 2006, France Telecom signed an agreement with the Worldwide Trade Union Alliance (UNI) according to which it undertakes to conduct a social policy respectful of fundamental social rights and individual freedom.

The purpose of the Code of Conduct Sourcing and Supply Chain is to set out the standards the France Telecom Orange Group wishes to be implemented by its partners or suppliers (hereafter jointly called "suppliers"), and namely by ensuring that working conditions in France Telecom Orange's supply chain are safe, that workers are treated with respect and dignity, and that manufacturing and supply processes are environmentally responsible. Supplier is expected to read, understand and adhere to the Code of Conduct Sourcing and Supply Chain.

Compliance with this Code of Conduct Sourcing and Supply Chain requires not only strictly adhering to current laws and regulations, but also adopting a proactive attention to continuously improve and adapt the current social and environmental conditions to new goals to come in favour for a more responsible and sustainable development. This Code of Conduct Sourcing and Supply Chain goes further, drawing upon internationally recognized standards.

# Code of Conduct

## Sourcing & Supply Chain

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# implementation

## of the Code of Conduct Sourcing and Supply Chain



Within any relationship, and in particular but not exclusively during each purchasing process, the France Telecom Orange Group requires and expects any of its partners, suppliers and through them their own sub-contractors to :

- **respect** all applicable national, European and international rules relating to ethical and responsible standards of behaviour, including, without limitation, those dealing with human rights, environmental protection, sustainable development, fight against bribery, child protection
- **adopt, abide, apply and actively pursue** conformance with ethical standards and commitments that match our own,

for the whole duration of the pre-contractual and contractual relationship across their whole business and within their own supply chain.

In particular the prerequisite to enter into negotiation or signing any supplier contract is to adhere and to actively adopt the commitments described within this Code of Conduct Sourcing and Supply Chain.

# follow up

## of the Code of Conduct Sourcing and Supply Chain

France Telecom Orange Group will work collaboratively with its suppliers during precontractual and contractual relationship on the implementation of this Code of Conduct Sourcing and Supply Chain.



Suppliers will implement the Code of Conduct Sourcing and Supply Chain with an appropriate management system to ensure :

- **compliance** with applicable laws, regulations and customer requirements related to the participant's operations and products; and
- **identification and mitigation** of operational risks related to this Code of Conduct Sourcing and Supply Chain.

Suppliers will communicate clearly and accurately with France Telecom Orange about their practices, policies, expectations, performances and measures when requested to do by France Telecom Orange in transparency, based in particular but not exclusively on SA8000 standards and management system.

France Telecom Orange Group will be entitled, by itself or through a nominated auditor, to audit suppliers and through them supplier's sub-contractors in order to assess their conformity to this Code of Conduct Sourcing and Supply Chain. This may include on site audit process.

According to its reporting practices, France Telecom Orange Group is likely to publicly report on the implementation of the Code of Conduct Sourcing and Supply Chain by its suppliers and their own subcontractors.

# commitments

## Social and Environmental engagements

### 1. Child Labour

Child labour is strictly prohibited. The minimum age for employment or work shall be 15 years of age, the minimum age for employment in the country, or the age for completing compulsory education in that country, whichever is higher. Workers under the age of 18 shall not perform work that is likely to jeopardize their health or safety.

### 2. Forced Labour

Suppliers shall not use any form of forced or compulsory labor. All work must be voluntary and workers should be free to leave work or terminate their employment with reasonable notice. Workers must not be required to lodge deposits or surrender any government-issued identification, passports, or work permits as a condition of employment.

### 3. Health & Safety

Suppliers will provide their employees with a safe and healthy workplace in compliance with all applicable laws and regulations.

Consistent with these obligations, suppliers must have and implement effective programs that encompass life safety, incident investigation, chemical safety, ergonomics, etc. and provide the same standard of health and safety in any housing that is provided for employees.

### 4. Freedom Of Association & Right To Collective Bargaining

Suppliers must respect the right of workers to associate freely, form and join workers organizations of their own choice, seek representation, and to bargain collectively, as permitted by and in accordance with the applicable laws and regulations. Suppliers shall ensure that representatives of such personnel are not the subject of discrimination and that such representatives have access to their members in the workplace.



### 5. Discrimination

Suppliers do not discriminate against any worker based on race, color, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, national origin, or marital status in hiring and employment practices such as applications for employment, promotions, rewards, access to training, job assignments, wages, benefits, discipline, termination, and retirement. Suppliers may not require a pregnancy test or discriminate against pregnant workers except where required by applicable laws or regulations. In addition, suppliers may not require workers or potential workers to undergo medical tests that could be used in a discriminatory way except where required by applicable law or regulation or prudent for workplace safety.

### 6. Disciplinary Practices

Suppliers will treat all employees with respect and will not use corporal punishment, mental or physical coercion, any form of abuse or harassment and threat of such treatment.

### 7. Working Hours

Working hours, including overtime, shall not exceed, the maximum set by the applicable laws and regulations. Employees shall be allowed to have at least one day off per every seven-day week. Suppliers shall grant to their employees the right to paid holidays in accordance with local law.

### 8. Remuneration

Suppliers shall comply with all applicable laws and regulations, including those relating to minimum wages, overtime hours and legally mandated benefits. Suppliers may not use deductions from wages as a disciplinary measure. Workers must be paid in a timely manner, and the basis on which workers are being paid must be clearly conveyed.

### 9. Ethics and anti-corruption

Suppliers shall prevent and fight all forms of corruption, extortion, embezzlement, bribery and improper advantage. Monitoring and enforcement procedures shall be implemented to ensure conformance.



## 10. Environment

Suppliers shall not only comply with all environmental laws and regulations, but also implement measures contributing to the protection of the environment.

Therefore, they should strive to minimize the adverse environmental impact of their products and services during the whole product life cycle: conception, development, production, transport, use and disposal or recycling.

This will include, among other aspects :

- **I. Environmental Permits and Reporting**

All required environmental permits (e.g. waste monitoring, transportation), approvals and registrations are to be obtained, maintained and kept current.

- **II. Pollution Prevention and Resource Reduction**

The Supplier must work to reduce the use of raw materials and resources as well as to eliminate the waste produced by all its activities. This goal will be achieved through the improvement of production, maintenance and cleaning processes, modes of conservation and transportation, as well as the substitution, re-use and recycling of materials.

- **III. Product Content and Hazardous Substances**

Respect of all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances, including labelling for recycling and disposal.

Chemical and other materials posing a hazard if released to the environment are to be identified and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

Ensure the compliance of all its products to the terms of the European Directive 2002/95/CE RoHS on the Reduction of Hazardous Substance whatever the country of delivery even if not listed under this text.

- **IV. Wastewater and Solid Waste**

Wastewater and solid waste generated from operations, industrial processes and sanitation facilities are to be characterized, monitored, controlled and treated as required prior to discharge or disposal.

Supplier will implement :

- a design that facilitates the recycling;
- a reduced and easy to recycle packaging.

- **V. Air Emissions**

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, monitored, controlled and treated as required prior to discharge.

- **VI. Energy consumption /CO<sup>2</sup> emission reductions**

France Telecom Orange Group pays a particular attention to the energy consumption and environmental impact during the whole product life cycle.

Therefore, the Supplier is encouraged to develop products or services that feature:

- A low energy consumption and environmental impact during their manufacturing, delivery and installation;
- A low energy consumption in operation;
- An improved resistance to high temperatures (thus decreasing the need for cooling).

# references

France Telecom Orange Group values, and the principles underlying France Telecom Orange Group actions are in line with fundamental principles such as the Universal Declaration of Human Rights, and those drawn up by the International Labour Organisation (notably as regards the ban on child labour and forced or compulsory labour), by the OECD (and the fight against corruption in particular), and the commitments to which the France Telecom Orange Group has subscribed, especially as regards sustainable development and by being among the first to sign the United Nations Global Compact.

Our references include without limitation, the principles, provisions and commitments contained in the texts herein listed and any national legislation implementing these texts:

- The OECD Convention on Bribery;
- The Convention on the Rights of the Child adopted by the United Nations General Assembly on 11/20/1989 resolution N° 44/25;
- The International Labour Organization (ILO):
  - N° 29 : Forced Labour Convention,
  - N° 105 : Abolition of Forced Labour Convention,
  - N° 111 : Discrimination (Employment and Occupation) Convention,
  - N° 182 : Worst forms of child labour Convention,
  - N° 138 : Minimum Age Convention,
- The Stockholm Convention of 2001 on Persistent Organic Pollutants;
- The Montreal Protocol of September 1987 on Substances Depleting the Ozone Layer;
- The Basel Convention of 1989 on the Control of Transboundary Movements of Hazardous Wastes and their Disposal.

Any supplier is requested to refer and to check on a regular basis the improvement of our set of value that France Telecom Orange makes available from time to time on our web pages: [http://www.orange.com/en\\_EN/responsibility/](http://www.orange.com/en_EN/responsibility/)



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