



## Orange S.A. : Position on scarce resources and valorization of critical materials – October 2013 (draft)

**Paris - October 2013 : Orange S.A. commits to follow the strategic impact of scarce resources and critical materials used in equipment and products linked to its activities.**

Orange S.A. commits, in a voluntary approach and as part of its Corporate Social Responsibility policy, to monitor the traceability and transparency of scarce resources and materials considered to be critical.

The Group has no manufacturing activity. For some equipment and products, it develops specifications towards some of its suppliers and then installs equipment in its infrastructures and brings products on the market for consumers and businesses. Given these parameters, the Group is committed to seeking potential reputational risks, economic risks and corporate social responsibility risks associated with scarce and critical resources.

Orange SA conducted a study of risks and impacts related to its key strategic purchases. This study has identified several categories of materials to follow:

- a list of 12 priority materials: Gold, Silver, Tin, Lithium, Copper, Cobalt, Antimony, Silicon, Germanium, Bismuth, Graphite, Nickel,
- Rare Earths as identified by the European Commission and Platinoids,
- Minerals from conflict zones : Tin, Tungsten, Tantalum, Gold and their derivatives.

A steering committee has been set up with the relevant business teams :

- It is responsible for collecting , analyzing and defining appropriate actions for key strategic purchases
- An escalation process and a process of due diligence has been defined to better manage crisis situations ,
- A strategic committee comprising Executive Directors of the Group arbitrates decisions.

Orange SA encourages its suppliers to better understand and limit the use of scarce resources and to make available information on the composition of equipment they provide. The following means are used:

- publication of an Orange supplier code of conduct
- incentive in the specifications to follow and limit the use of scarce resources , encourage the substitution of these materials or the use of recycled resources
- inclusion in contracts of elements related to conflict minerals, rare & critical resources,

- provision of a tool for analysis of critical materials, and incentive to use the tools and documents from organizations such as the International Telecommunication Union and the Global e-Sustainability Initiative ,
- conduct of audits , under the Joint Audit Cooperation, including questions dedicated to conflict minerals.

Section 1502 of the Dodd Frank Act on " Conflict Minerals " encourages suppliers to ensure traceability of certain minerals which enter into the composition of their equipment and to promote transparency within their own supply chain. Minerals concerned are: Tin , Tantalum , Tungsten, Gold or their derivatives.

The Supplier is encouraged to track minerals sourcing and promote transparency among its own supply chain. As far as Conflict Minerals are concerned, the Supplier shall put in place measures to limit negative social and environmental impacts, help to create a responsible mineral trade, and provide on demand the measures put in place for this purpose.

About :

- Joint Audit Cooperation :

[http://www.orange.com/en/commitments/responsibility/vision/Folder/old\\_arbo/responsible-sourcing-supply-chain/Joint-Audit-Cooperation/Joint-Audit-Cooperation](http://www.orange.com/en/commitments/responsibility/vision/Folder/old_arbo/responsible-sourcing-supply-chain/Joint-Audit-Cooperation/Joint-Audit-Cooperation)

- Orange supplier code of conduct:

<http://www.orange.com/en/commitments/responsibility/vision/responsible-purchasing>