

# CSR Report

iliad  
GROUP



Thomas Reynaud,  
Chief Executive Officer of the Iliad Group

# Introduction by Thomas

Investing  
time and money  
in the planet

**T**he ecological transition relies and will continue to rely on digital technology. It follows, therefore, that digital technology must be exemplary from both an environmental and social perspective.

Within the Iliad Group we believe in being bold and innovating. These two principles are central to the way we conduct our business. The same applies to the way we are addressing the massive challenge facing each and every one of us to protect our planet, by mitigating climate change obviously, but also by protecting our water reserves and preventing the depletion of our natural capital.

Over the past few years, the in-house teams we've mobilized to work on this issue have developed and deployed innovative solutions covering our entire value chain, from upstream – our energy supplies – to downstream, such as the recycling of our boxes. We have worked humbly – because we know that nothing is easy, but firmly – because these actions are imperative – on improving not only our scope 1 and 2 emissions but also our scope 3 performance by stepping up dialog with all of our partners. We can't save the planet on our own!

This first edition of our CSR report is an important milestone. It is a synopsis of all the sustainability initiatives launched by the Group in the three countries in which we operate and it takes stock of everything we have done so far to meet our ten climate pledges. We are delighted to be able to share our experience, and reading through you'll find out about the practical measures we've taken (some of which are little known) in terms of energy saving, the promotion of renewable energies and, of course, the circular economy – an area in which we're particularly leading-edge. You'll also discover everything we're doing to contribute positively to society, especially in terms of inclusion, solidarity, employment and cybersecurity.

A milestone, but also an opportunity to reaffirm our commitment. Going forward, we intend to continue to invest time and money to reduce the environmental impact of our business activities, always applying the highest possible standards. Which is why we have adopted the SBTi framework for our emissions reduction pathway.

The ecological transition must not lead to economic exclusion. Our subscribers' purchasing power must not in any way be weighed down by everything we're doing. That wouldn't be fair. We understand that we need to invest without raising the price of our most popular plans. That forms part of our responsibility as a business operating in a rapidly changing world.

I would like to thank all of the Group's teams for their hard work and dedication. I hope you enjoy reading this report and that it will be a source of inspiration.

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CSR Report (based on 2022 data)

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**Mothias**  
R&D mechanical  
engineer  
Free

# 01 Overview of the iliad Group

The iliad Group is a major player in the European telecommunications sector, with over 16,700 employees serving 45.8 million subscribers.

# Key facts and figures\*

## Market-leading brands

**free**

No. 4 favorite brand in France<sup>1</sup>

**iliad**

No. 1 favorite telecoms brand in Italy<sup>2</sup>

**PLAY**

No. 1 favorite telecoms brand in Poland<sup>3</sup>

<sup>1</sup> Source: Brand Finance / <sup>2</sup> Source: BVA Doxa / <sup>3</sup> Source: Forbes

## Our own telecom networks

### France



**23,800**  
base stations

**31.3m**  
marketable Fiber sockets

### Italy



**9,500**  
base stations

**8m** addressable households in the Fixed-line market

### Poland

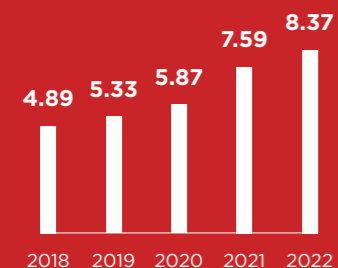


**10,600**  
base stations

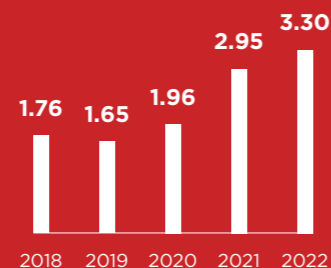
**3.8m** addressable households in the Fixed-line market

## A growing Group

### Revenues (in €bn)



### EBITDAoL (in €bn)



\* At end-2022.

**16,700**  
employees

**45.8m**  
subscribers, o/w:

**36.5m**  
Mobile subscribers

**9.3m**  
Fixed-line subscribers

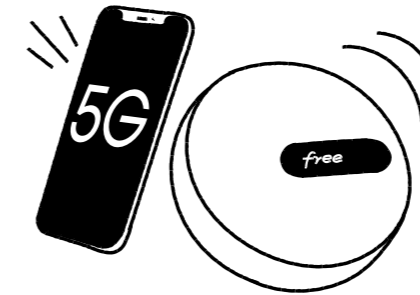
**€8.37bn**  
in consolidated revenues

**6.9%**  
like-for-like growth

**€2.1bn**  
total full-year capex

A Group that's  
**100%**  
independent

# 01 Overview of the iliad Group



## A vision and a mission

Right from the start of the iliad Group's epic story, we intuitively knew that the digital revolution was going to change the world. And for over 20 years now, from our invention of the world's first triple-play box to our entry into the Italian and Polish markets, we have both driven and partnered this revolution, with a clear underlying objective: to bring digital technologies within everyone's reach.

**1999**

the year the iliad Group was created

### ► Free – revolutionizing telecoms

The Internet is an innovation like no other. It has unlocked the doors to universal access to information and has completely changed both how we communicate and our attitudes to knowledge. Right from the outset, the founders of the iliad Group strongly believed that everyone should be able to access the Internet, in the same way as other essential services. Building on this conviction they went on to found Free in France, and revolutionized the telecoms market.

The Free revolution subsequently forged the identity of the iliad Group, based on three fundamentals:

#### ► Straightforward and accessible offerings.

We invent solutions that allow everyone to access digital technologies easily and at affordable prices. We firmly believe that the basic tariffs of these offerings must be as fair as possible for consumers. Our pricing policy was a game-changer for the French telecoms market.

#### ► Our own infrastructure right across the country.

We are committed to the idea that everyone should be able to access our communication technologies wherever they may be. That's why we chose to develop our own Fixed and Mobile infrastructure covering all geographic areas, both urban and rural. And our prices are the same everywhere.

#### ► An organization underpinned by diversity and openness.

We see digital as a universal language and the Internet as a way of bringing people together. This vision is embodied in the incredible diversity of our teams. We also make sure that everyone finds their place at iliad by favoring empowerment and accountability rather than rigid hierarchical structures.

## ► Bringing digital technologies within everyone's reach

The digital revolution that started with the Internet has spread rapidly, shaking up usages, business models and even the structures of society. At Iliad, we firmly believe that these profound changes will help everyone move forward.

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

Our mission is still the same today.

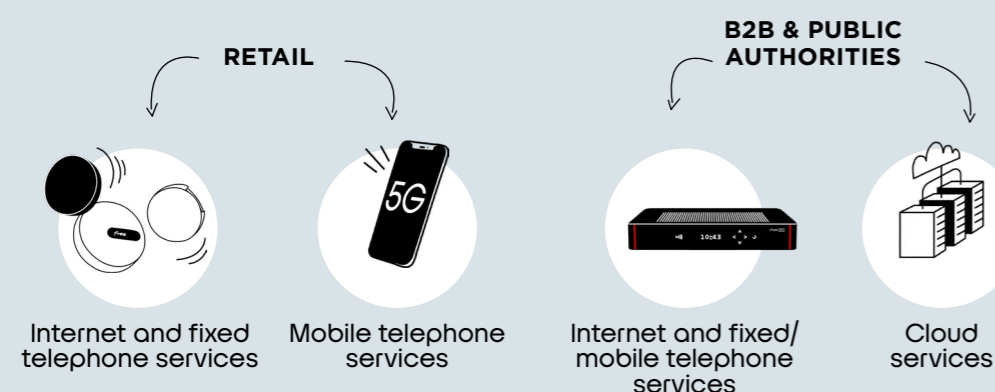
Thanks to the rollout of our Fiber networks, which began in 2006, our subscribers now have easy access to Ultra-Fast Broadband. And the deployment of 5G will usher in new game-changing usages in many fields (such as medicine, industry, urban planning, education and training), in association with other technological advances (AI, robotics, etc).

In 2018, we entered the Italian Mobile market with the same credo: digital revolution for everyone. Then in 2020 we acquired Play, the largest mobile operator in Poland, with a similar DNA to ours and which has enabled us to address the Polish market with the same vision. And in 2022 we purchased the fixed-line operator UPC Polska, in continuation of the same strategy, with the aim of becoming a convergence leader in Poland.

Lastly, our B2B offers are helping to accelerate the digital transformation of small businesses in France and Italy, which themselves are playing an important role in revolutionizing usages nationwide.

In recent years, the environmental crisis, changes in society's needs and expectations and wider inequalities have all transformed the world we live in. We need to rise to these new challenges and be prepared to adjust our course, to ensure that in the coming decade the digital revolution will be inclusive, cohesive and environmentally friendly.

## Our business activities



## Our values

The Iliad Group was created when we invented the world's first triple-play box – technological innovation is in our DNA.

But our innovation is always put to the service of three fundamental values that underpin all of our business activities and organizational processes.

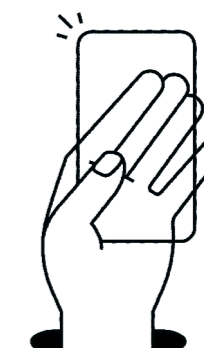


### ► Liberty

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

### ► Honesty

We've always campaigned for fair prices in the telecoms sector, and we were the first operator to bring unlimited calls and text messages within everyone's reach thanks to our Free Mobile Plan costing less than €20 a month. We invest massively in our infrastructure to be able to deliver our services at the best possible price. Honesty also means clearly stating how our business impacts the environment and constantly doing everything we can to minimize those impacts.

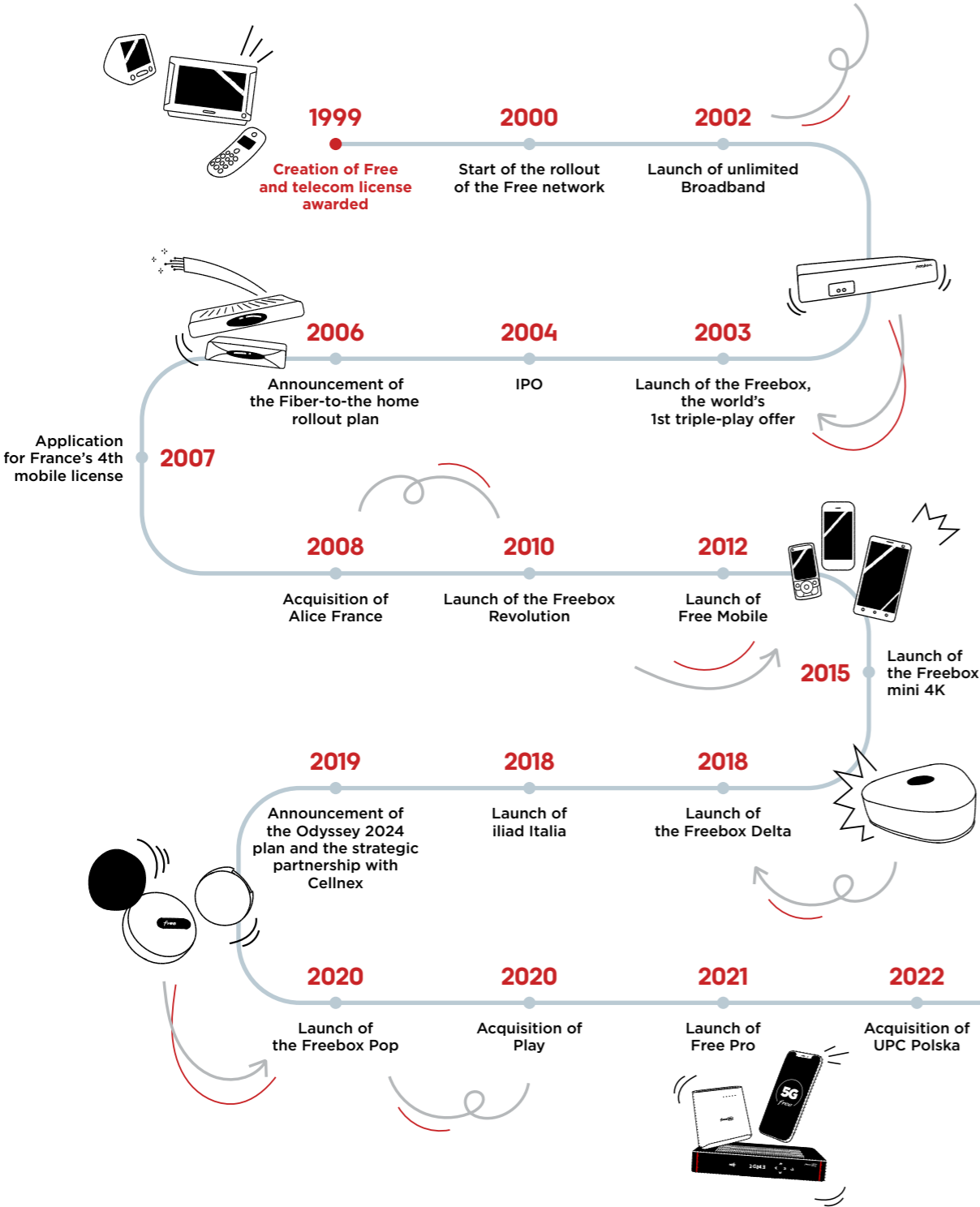


### ► Simplicity

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

# Our history

Since 1999, the Iliad Group has been on an amazing entrepreneurial adventure. We've grown a lot in the last 20 years, but we've never lost our unique Free spirit that has always driven us to do things our own way.



**Xavier Niel at the launch of the Freebox Revolution in 2010**

**January 10, 2012: the mobile revolution begins!**

**The Freebox Delta, a hub of technological innovation launched in 2018**

**2018: Iliad enters the Italian mobile market**

**The latest little gem – the Freebox Pop – was launched in July 2020**

**2020: the Iliad Group acquires the Polish mobile operator Play**

**2022: the Polish fixed-line operator UPC Polska joins the Iliad Group**

**In May 2023, Iliad Italia celebrated its 5th anniversary and passed the milestone of 10 million subscribers**

# A European Group

The Iliad Group is a major player in the European telecoms sector. Present in France, Italy and Poland, we employ over 16,700 people serving 45.8 million subscribers – 36.5 million Mobile subscribers and 9.3 million Fixed-line subscribers. We are Europe's sixth-largest mobile operator by number of subscribers\*.

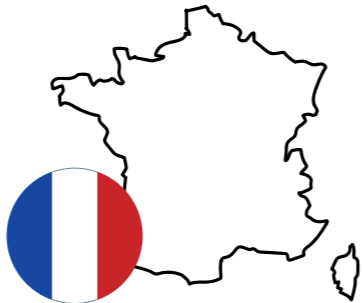
\* Excluding M2M



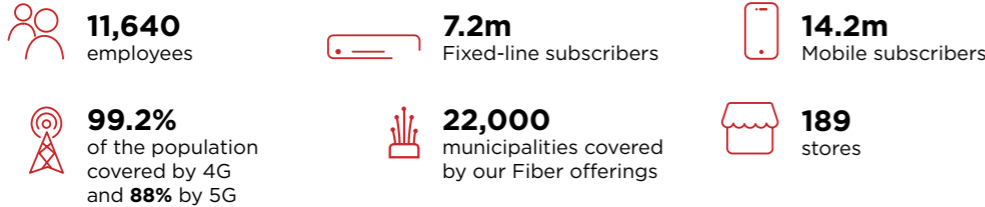
## In France

### BUSINESS ACTIVITIES

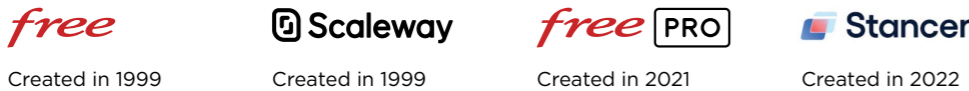
- Fixed-line operator
- Mobile operator
- Cloud and Cybersecurity solutions provider



### KEY FIGURES



### BRANDS



## In Poland

### BUSINESS ACTIVITIES

- Fixed-line operator
- Mobile operator

### BRANDS

**PLAY**

Created in 2004 and acquired in 2021



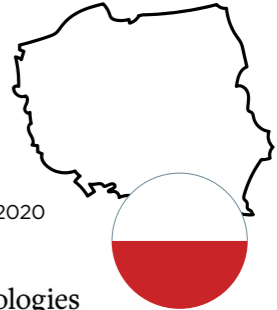
Created in 1989 and acquired in 2022



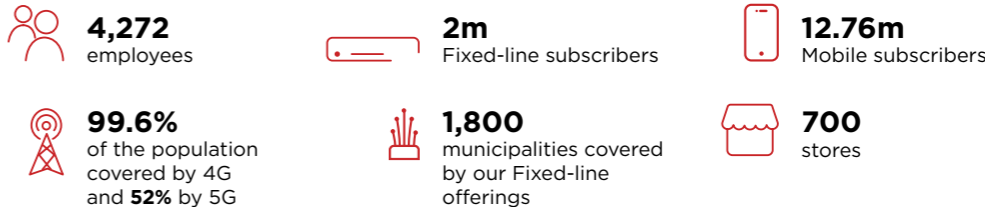
Created in 2012 and acquired in 2020

**RedgeTechnologies**

Created in 2007 and acquired in 2022



### KEY FIGURES



## In Italy

### BUSINESS ACTIVITIES

- Fixed-line operator
- Mobile operator

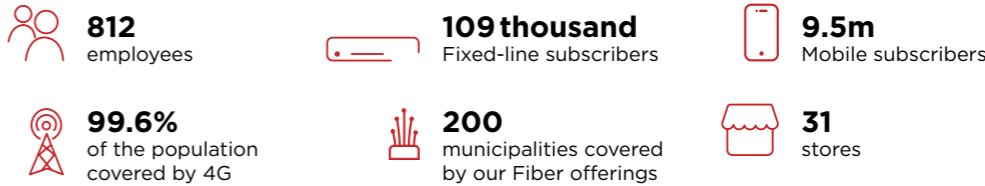
### BRAND

**iliad**

Created in 2018



### KEY FIGURES





Lorenzo  
Software  
Engineering Manager  
iliad Italia

## 02 Doing things right

As our Group grows in Europe, we are fully embracing our corporate social responsibility and are committed to working together to make sure we always do things right, every day.



### A Board of Directors' Committee specifically dedicated to CSR

➤ Towards the end of 2022, the Iliad Group set up a CSR Committee within its Board of Directors. This Committee's role is to oversee the Group's ESG objectives, action plans and performance. It comprises three directors: Bertile Burel, Virginie Calmels and Jacques Veyrat (Chair).

From top to bottom:  
Bertile Burel, Virginie Calmels, Jacques Veyrat.

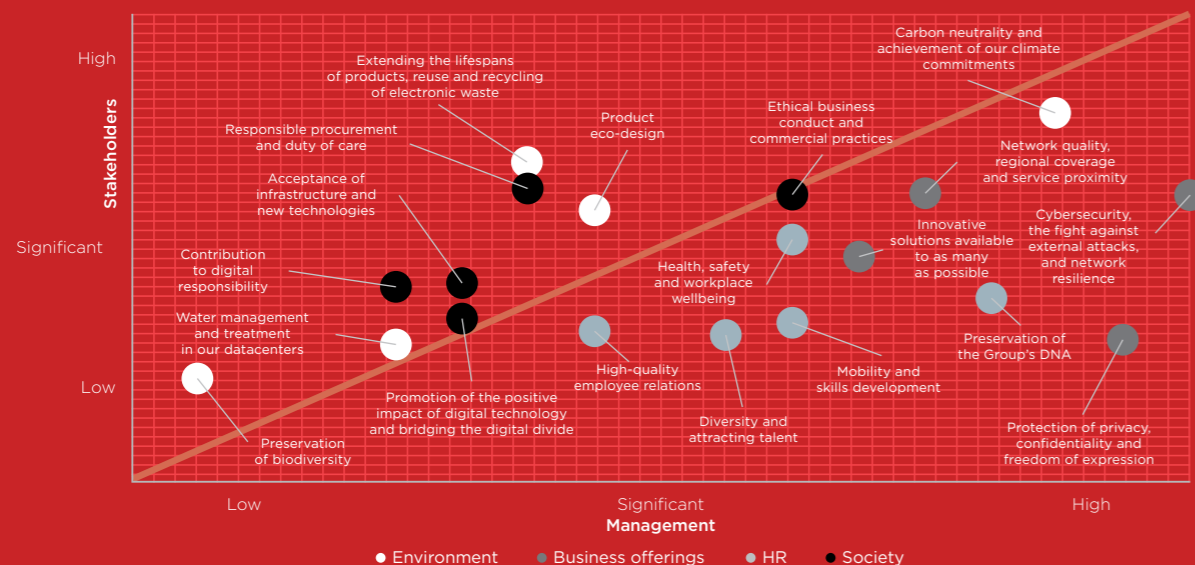
### Materiality analysis: the Iliad Group publishes its results

➤ At the end of 2021 the Group launched its first materiality analysis, the results of which were published in late 2022. A materiality analysis is a process used by a company to identify CSR issues in terms of their importance to its performance and to stakeholder expectations. It is a key tool for businesses to assess their corporate social responsibility and their contribution to the United Nations' Sustainable Development Goals (SDGs).

The five consensus priority issues identified for the Iliad Group are:

- ▶ carbon neutrality and achievement of our climate commitments
- ▶ ethical business conduct and commercial practices
- ▶ cybersecurity, the fight against external attacks, and network resilience
- ▶ network quality, regional coverage, and service proximity
- ▶ health, safety and workplace wellbeing

### Materiality analysis



## 02 Doing things right



### Our CSR policy

For the Iliad Group, being a good corporate citizen basically means doing things right. It's our way of meeting the environmental challenges and legitimate demands of today's society, in the same way as we meet the needs and expectations of our subscribers every day in our business.

8  
priority  
Sustainable  
Development  
Goals (SDGs)

We've built up the Iliad Group in less than 30 years. You can't build a group like ours in such a short space of time if you don't do things right.

From the very outset we've always aimed for technical excellence, best-in-class service quality and ultra-competitive prices. Every day, all of our teams work hard to provide the best possible service to all of our subscribers. It's not always easy, and we're not perfect, but there's no mistaking our commitment to doing things right.

We've never assumed that to do things right, all it takes is to focus on performance and efficiency. It also means acting responsibly towards our employees, the environment, the regions we work in, and society as a whole.

The vision underlying our entrepreneurial venture has never wavered, and today it drives all of our teams in France, Italy and Poland:

- ▶ To give everyone, everywhere, equal access to digital technologies.
- ▶ To limit telecom costs for households by billing them at a fair price.
- ▶ To build a group that is outward-looking, where each and every one of our employees can find their place.

In recent years we've incorporated a new dimension into our socially responsible approach: reducing the environmental footprint of our activities.

This resulted in the announcement in January 2021 of our climate strategy, aimed at drastically reducing our greenhouse gas emissions to contribute to global carbon neutrality.

As our Group grows in Europe, we are fully embracing our corporate social responsibility and are committed to working together to make sure we always do things right, every day.



➤ In 2021, the Iliad Group joined the United Nations' Global Compact, the starting point for any company seeking to align itself with the UN's Sustainable Development Goals (SDGs). Out of the overall 17 SDGs adopted by the United Nations in order to create a better and more sustainable future for everyone, we consider eight to be priorities for us.

## A few words from our executives



Nicolas Thomas,  
CEO of Free



//

**In early 2022, Free once again demonstrated its determination to defend purchasing power in France by undertaking not to touch the prices of its mobile plans for five years, despite the inflationary context.**

Additionally, our employee satisfaction survey and gender equality index for 2022 clearly show the healthy work atmosphere within our company and our ability to provide a happy and fulfilling working environment for all of our people.

We're also continuing our efforts to meet our 10 climate pledges. All of our teams have fully taken on board our action for the environment and we're making transformational changes to our businesses. In 2022, for example, we extended our initiative of switching off radio frequency bands at night to other bands in order to further reduce the energy consumption of our mobile network. We also entered into a partnership with Certideal to encourage the purchase of refurbished phones. And we raised awareness among our subscribers and employees about adopting eco-friendly habits.

In 2023 we intend to go even further, in particular through the work of our CSR ambassadors within our subsidiaries.

//

**Together with its teams and customers, Free Pro is implementing a large-scale CSR action plan, in line with the overall CSR strategy led by the Group. A prime illustration of this is our new head office located in the Smarsteille eco-district of Marseille in a building that sets the standard for sustainability.**

Likewise, when we carry out extension work on our data centers we integrate the cooling systems into the design of the server rooms, and install latest-generation servers so as to minimize greenhouse gas emissions.

CSR is also an integral part of our governance strategy, for which we've drawn up a detailed action plan with precise targets. For example, all of Free Pro's employees will take part in a "Climate Fresk" workshop by the end of 2024.

Lastly, we're partnering our customers in their own transformation processes by providing them with an estimate of their carbon emissions for all of our Fixed and Mobile telecom offerings. And in 2024 we'll also give them an estimate of the energy and water they consume when using our hosting and cloud services.

//

**Responsibility, transparency and eco-innovation are all part of Scaleway's DNA. For several years now, we've put in place tangible measures with a view to optimizing the energy efficiency of our data centers and radically reducing their water consumption, as well as developing ambitious initiatives to promote the circular economy.**

As pioneers in the reuse of servers, in 2022 we reused 80% of our installed servers that were entering their end-of-life phase. And in 2023 we'll be keeping up this level – going even further in fact, by tripling the capacity of our "Nursery" program designed to extend the lifespan of hard drives.

We're now going to be looking at measuring the environmental footprint of our cloud services, so we can provide our customers with objective-based, transparent and actionable data about the impact of their use of Scaleway's digital services and solutions.



Damien Lucas,  
CEO of Scaleway



Jean-Marc Harion,  
CEO of Play and UPC Polska



//

**At Play we defend our customers' freedom of choice. That's why we're constantly developing innovative, value-for-money offerings to meet their needs for unlimited communication and entertainment.**

And the importance we place on social responsibility actually exceeds our customers' expectations. For example we've put in place solutions to optimize and reduce our energy consumption, both for our network and in our stores and offices.

We've also taken steps to completely eliminate plastic in our logistics processes throughout our products' life cycles, such as by introducing fully recyclable packaging.

In 2022, our teams moved into action to help the Ukrainian people. First, by offering free calls and texts to the refugees as from the first day of the conflict. Then by providing Ukrainian telcos with the equipment and people they needed to repair their networks.

And we've already got a lot in the pipeline for 2023. For instance, Play will be setting up a corporate foundation called "Freedom of Choice", which will support and partner the 42 Coding Academy in Warsaw. Because we firmly believe it's through education that we can offer everyone the freedom of choice!



Benedetto Levi,  
CEO of Iliad Italia



//

**At Iliad Italia we've revolutionized the Italian telecoms sector. We're convinced that sustainable relations with our subscribers can only be achieved through quality, transparency and honesty. So we've always offered them affordable plans with no hidden costs.**

For us, the role of telecoms is to connect people and create a better future by bridging divides. As a business, we have a duty to participate in building the society that telecoms can create, and to make it more equal and more inclusive.

We're unwaveringly pursuing this objective by developing a sustainable company and infrastructure built on cutting-edge technology, and by making every effort to earn the trust of our community. That's why we're investing in skills development projects, such as Iliadship and Iliad College. We're also fully aware that telecoms have a significant impact on the environment – particularly in terms of energy consumption, which we're constantly striving to reduce.

We're proud to be part of the Iliad Group, and we're proud of its team spirit and ability to adopt a global vision to achieve a more sustainable future. We've still got a lot to accomplish though, and we're looking forward to rising to all the challenges that lie ahead.



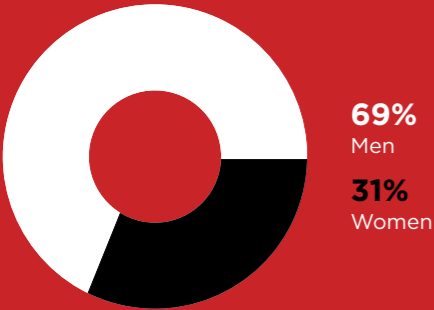
Elodie  
Store Manager  
Free

## 03 For our people

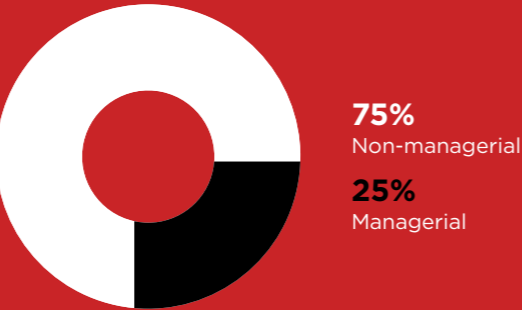
The iliad Group is made up of over 16,700 people working in a wide variety of jobs, ranging from network technicians and subscriber relations advisors in our stores and contact centers, through to R&D and corporate support teams. And we're committed to doing everything we can to make sure each and every one of them is happy in their work.

# Key facts and figures\*

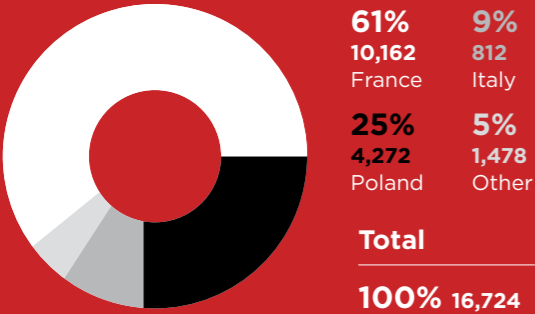
Breakdown by gender



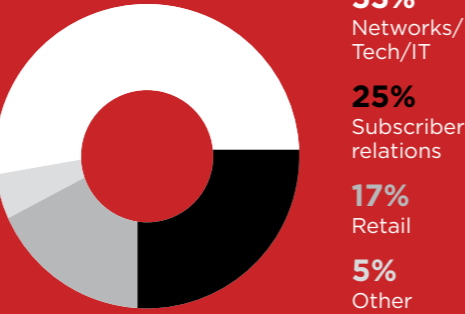
Breakdown by category



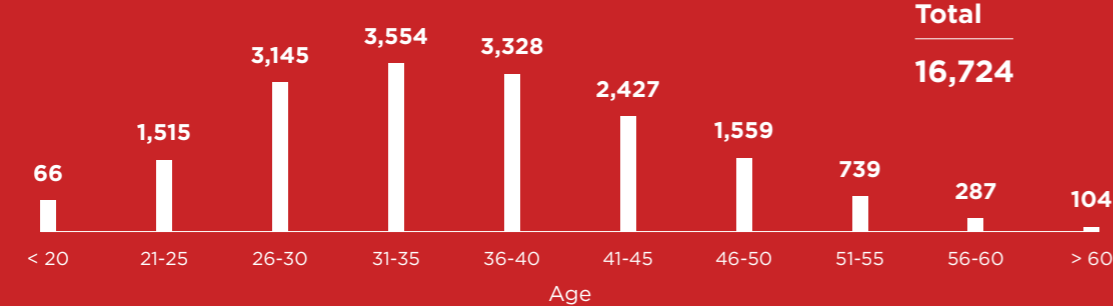
Breakdown by country



Breakdown by job-type



Breakdown by age



Increase in headcount



\* At end-2022.

# 03 For our people



## Enabling our people to take charge of their career

When our people join us at the iliad Group, they embark on an entrepreneurial adventure on a European scale, enjoying unique freedom to learn continuously and map out their own career paths.

400  
different  
job-types within  
the Group

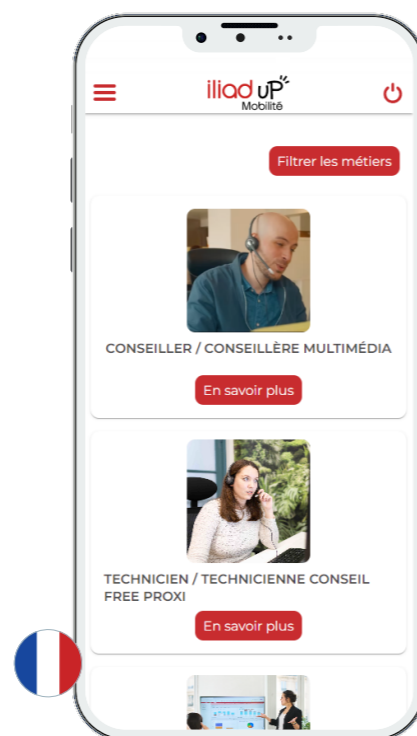
### Freeing up potential through internal mobility

Freedom is the very essence of our corporate culture and guides our overall approach to talent management. The Group is a major employer in its industry, and created 441 net jobs in 2022 in its three geographies (not counting UPC Polska). The vast majority of our staff are on permanent contracts, in line with our stated aim of giving a long-term commitment to our people and providing them with a stable situation. In 2022, 92% of our posts were permanent positions. We also offer a very wide range of professions, with no fewer than 400 different job-types available.

Internal mobility is a key aspect of our vision for career development, embodying our commitment to creating personalized career paths. In 2022, there were more than 500 job moves within the Group, representing some 13% of our overall recruitment for the year. We firmly believe in the idea of a career ladder, and that everyone should be able to reinvent themselves, which is why we create unique pathways. As a result, promotion from within forms an integral part of our corporate identity.

### Promotion from within – a key element of our corporate culture

Many managers within the Group started out lower down in the organization. In France for example, more than half of the directors of our subscriber relations centers began as contact center agents. A total of 404 employees were promoted across the Group in 2022, including 214 to managerial positions. This promotion from within is a clear demonstration of the importance we place on knowledge transfer in our corporate culture.



✚ In 2022, iliad Italia put in place a program of 20 career development workshops for its employees. The aim of these workshops was to help the participants to take charge of their careers by learning how to set objectives, get feedback from their colleagues and put the company's values into practice on a daily basis.



✚ In France, with a view to enhancing access to internal opportunities we've rolled out a skills mapping and mobility platform called iliad UP Mobilité, which lets people play an active role in managing their career development by finding out more about the Group's various businesses and job-types, and then directly applying for in-house posts that match their aspirations.



Camille Perrin

Thomas Vimare

Caroline Alméras

Louison Bruguier

Gwendoline Helary

Clément Courbot

**iliad inside #1 : le market'**

✚ In France, in 2022 we also launched iliad Inside - a program of in-house meet-ups for finding out more about the range of jobs we offer. These events give employees from different teams the opportunity to share information and talk to others within the Group about their daily work, expertise and challenges.



I joined Free in 2007 as a field service technician and I gradually gained more responsibilities and skills until I became a works supervisor. Each time I changed job I was able to acquire new knowledge and further my expertise. All of these new stages in my career were challenges for me but they really made me want to succeed!

**Grégory**  
Supervisor - Transmission Works and Special Projects  
Free

► Continuous learning to unlock the freedom to succeed

At Iliad, we believe in the power of continuous learning for forging successful career paths, and our training policy clearly reflects this. We also view freedom to learn as a fundamental right, and we do everything we can to create an environment in which our people can thrive and build their skills at their own pace.

We don't believe that academic qualifications are the be-all and end-all and we're committed to offering our new talent comprehensive induction training to guide them towards success in their jobs.

Our overall aim is to enhance the employability of our people, and to meet this objective we offer them the keys to success in a constantly-changing world. In 2022, more than 14,500 Group employees were given in-house training and over 8,000 followed at least one external training course, with two main topics on the agenda: health and safety, and the environment.

In 2022 we also expanded the training offer for managerial staff, as we're keenly aware of the major role that our managers play in driving the Group's performance over the long term. In particular, we drew up action plans and created tailored pathways in several of our entities to reinforce managers' leadership skills and their ability to guide our organization towards greater heights of achievement.



32 hours  
of training  
on average  
per employee  
per year

For us, training is clearly a key driver for success and the Group provided over 500,000 hours of training in 2022, the equivalent of 32 hours per employee. It is also an investment in our people and a demonstration of the importance we place on making sure they feel fulfilled both on a professional and personal level. We don't see training just as a way of acquiring skills, but also as a road to freedom, independence and self-fulfillment.

► Our in-house universities

Providing learning opportunities for everyone is a value that Xavier Niel, Chairman of the Iliad Group, holds dear, and it's deeply embedded in our corporate culture. Over the past several years we've created in-house universities in each of our geographies. While each one has its own specific model, they all share the same aim of giving our people the tools they need to shape both their own future and that of our Group.



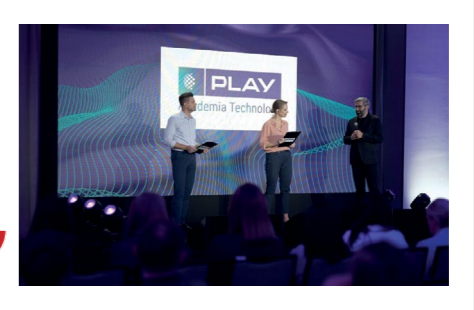
The F233 University

✚ In France, our F233 corporate university is a driver for obtaining qualifications through "validation of acquired experience" (VAE). To date, 90% of our employees who have gone through the F233 University have earned a diploma, compared with a national average of 42% for VAE participants in France. Our aim in offering the VAE program goes beyond just giving academic recognition – it's a way of retaining talent and helping society progress by breaking down barriers based on qualifications. Since 2018, more than 30% of the employees who've followed a VAE program have changed job and moved up within the Group.



Iliad College

✚ Iliad College is an in-house academy in Italy dedicated to training in-store sales advisors. And we've even opened it up to external participants! The training provided by Iliad College focuses on the Group's values and sales approach, 5G technology, the user experience and relational intelligence. When they've finished their classes at the College, participants join dedicated communities and attend in-depth monthly meetings. In all, more than 200 people have followed training at Iliad College, which clearly demonstrates our commitment to continuous learning.



Academy of Technology

✚ Our Academy of Technology in Poland is a blended conference open to all employees working in mobile technology, aimed at exploring convergence between TV, fiber and mobile services while providing detailed information about our offerings. In 2022, some 300 people attended the event in person, with the rest of our employees in Poland following it online.

# Equality and inclusion: putting our commitments into action

At iliad, diversity isn't just a policy – it's part of our DNA. Since its very beginnings, the Group has been built up through a fusion of talent from all backgrounds, driven by a shared passion for technological innovation.

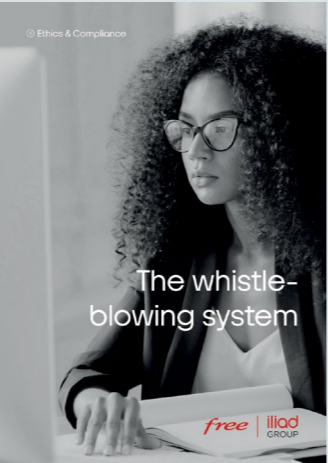
87  
different  
nationalities  
within the Group

## Diversity – our watchword

We promote a culture of inclusion and diversity within the Group, with motivation and personality being the priorities for recruitment. As a result, our workforce is exceptionally diverse, made up of 87 different nationalities. This wide variety of backgrounds, outlooks and experience enriches our working environment by stimulating creativity and innovation.

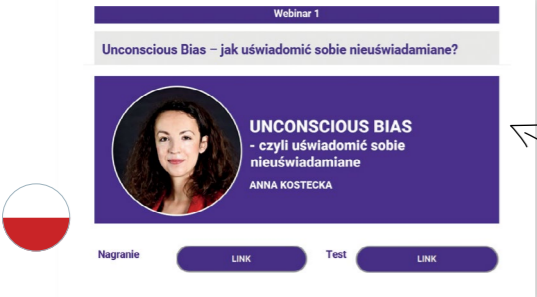
We're determined to keep our working environment free from any prejudice or discrimination, where talent and skills take precedence over any other criteria, in respect of everyone's rights and freedoms. To help us ensure we constantly comply with this principle, we've set up a whistle-blowing system so that employees can confidentially report any cases of harassment or discrimination.

At iliad, diversity is also much more than just an objective. It's a daily reality that shapes our identity and contributes to our success. We view diversity as the cornerstone of our ability to innovate and rise to the challenges of an ever-changing telecoms industry.



### A new whistle-blowing system

➤ In 2021 the Group's whistle-blowing platform (alerteethique.iliad.fr) was updated and a communication campaign was carried out to relay information about it to all of our employees. The platform can be used in particular to report any cases of harassment or discrimination, and it provides an alternative to the traditional route of going through line management.



➤ A standard-setting initiative was launched by our teams in Poland in 2022 – the Fair Play Manager program, comprising a cycle of three webinars for managers, focused on diversity and inclusion. They are designed to raise managers' awareness about issues such as unconscious bias, anti-harassment policies and inclusive communication. Each session ends with a test to assess whether the participants have understood and taken on board these crucially important issues.

## A pro-active disability inclusion policy

The Group is committed to creating employment opportunities for people with disabilities and helping them stay in their jobs. For example, in France we have company agreements, charters and targeted initiatives to help create a welcoming environment for our employees with disabilities. And we've put in place pro-active measures for supporting disabled team members and accompanying them along their career paths.

Within the iliad UES, which groups together several of our French entities, we have a Disability Officer who is in charge of raising employee awareness and assessing any adjustments that need to be made to workstations, which helps foster a culture of inclusion. During the European Disabled Employment Week, a wide range of actions are carried out to raise awareness about disability inclusion among as many people as possible. We also provide special homeworking equipment for our employees with disabilities, such as ergonomic chairs and sit-stand desks.

### DuoDay – our people get involved

➤ As it does every year, in 2022 the Group took part in the DuoDay event held in France during the European Disabled Employment Week, which took place from November 14 to 18.

This nationwide event enables a jobseeker with a disability to spend a day working as part of a duo with a volunteer employee. Several duos were formed within the Group, some lasting more than a day. The five people who took part in the 2022 edition of DuoDay liked the type of work we can offer and really enjoyed sharing time with us and finding out what we do at iliad.



### Protelco: a long-standing commitment

➤ In France, our subsidiary Protelco – dedicated to home technical assistance – has had a highly pro-active disability inclusion policy in place for a number of years now thanks to the signature of a State-approved agreement on the employment of people with disabilities. This inclusion policy covers a wide range of areas, including recruitment, adjustments to workstations, and people's underlying perceptions of disability, and has resulted in disability inclusion now being fully integrated into Protelco's everyday operations.

At end-2022, employees with disabilities represented 6% of Protelco's overall workforce.

## Gender equality: continuous improvement

In all of our geographies, we're determined to provide our employees with a working environment where men and women are valued equally, and where their skills, responsibilities and performance are appraised on an equal basis.

We've translated this commitment to gender equality into tangible actions. For example, at Free Pro in France, we're carrying out specific recruitment campaigns for women in tech and sales roles. And Free Réseau saw a 6% rise in the number of women in its workforce in 2022, clearly demonstrating how we're delivering on our promises.

At Play in Poland, we're working with student communities to identify new opportunities for recruiting talented women. An in-house women's community has also been created to encourage the sharing of ideas and mentoring with a view to helping women further their careers within our organization. At the same time, we've drawn up a back-to-work program for women returning from maternity leave that will be rolled out in 2023 and which is another illustration of how we're actively supporting the career development of our women employees.

At Iliad, we believe that equality lays the foundations for success, and we intend to continue to contribute to shaping a world where everyone is appraised based on merit, irrespective of their gender. Our commitment to equality is an invitation to join us in building a more equal and inclusive future, where everyone can achieve their full potential.



➕ In 2022, Play launched a series of "Women's Breakfasts", initiated by the women members of the subsidiary's Executive Committee. The objective is to promote the creation of an inclusive environment for women at Play, to chat together about the challenges they face, and to find solutions for increasing women's career opportunities.



➕ In France, to celebrate International Women's Day on March 8, our teams had an inspiring meet-up with Clarisse Agbégénou, a double Olympic champion in judo. She came to talk about her vision of gender equality, alongside five women ambassadors from our subsidiaries.



"I work in the Networks & TV department at Play and I'm helping with the Fiber rollout in Poland. I really like the variety of tasks I'm given, the way the operations teams are managed, and the fact that I get to see the tangible results of my work. I find my job really motivating.

**Monika Liedtke**  
Fiber Network  
Construction Manager  
Play

# Ensuring employee wellbeing

Our people's wellbeing is key to employee engagement and the Group's performance, and is an absolute priority at iliad. And in view of our history – an entrepreneurial venture led by a team of people who're passionate about what they do – it's also an integral part of our identity.

## 🔴 Cultivating innovation: a powerful component of our DNA

Within our Group, we firmly believe that the best way of nurturing innovation is to create a culture of empowerment and daring. We have a particular mindset at iliad, geared towards walking the talk and underpinned by a pro-active approach, respect for others, and seeking tangible results.

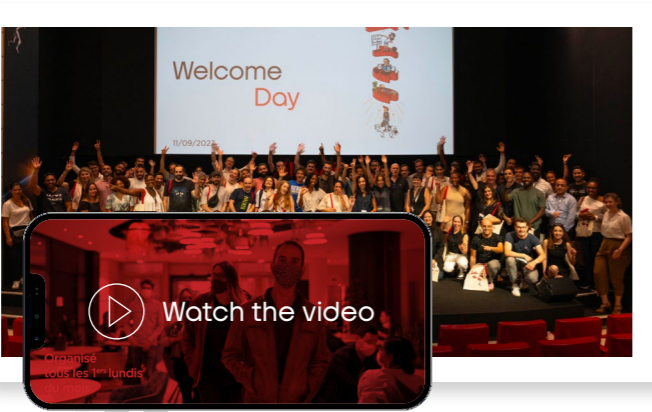
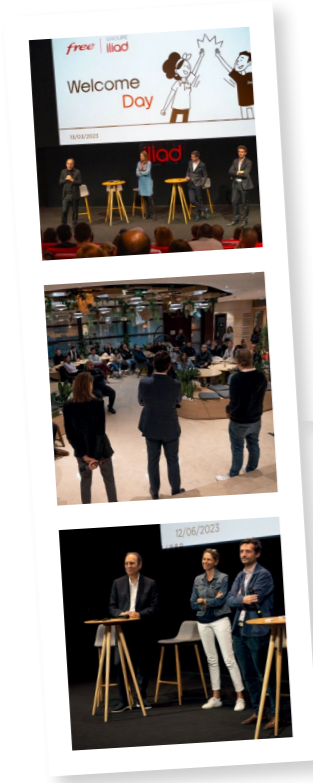
We've deliberately chosen to remain a human-scale organization, where every person is important to us, and we're determined to keep the start-up mindset that allows us to rise to the challenges of today's world.

Our Group also stands out for its competitive spirit. Our teams are always prepared to challenge themselves to be able to go the extra mile. Our recipe for this comes down to our watchwords of agility and reactivity: reporting lines are short, decisions are taken quickly, and simplicity is our guiding principle.

Our managers also have a large degree of freedom in how they lead their teams, rooted in a general culture of continuous learning, feedback and the right to make mistakes. All of this gives us the ingredients to aim for excellence while fostering a caring working environment.

## A dynamic culture

🔴 **Our culture is a dynamic one, and we're constantly seeking to reinvent ourselves. In Italy, for example, we've carried out a major project on redefining the leadership model, in line with our corporate values and company culture. This project helped craft an immersive managerial training program, focused on leadership skills and complexity management.**



## 🔴 Welcome Day – an induction that epitomizes who we are

🔴 **Every first Monday of the month, the new hires from across all of our entities in France are invited to the Group's head office for an induction morning, giving them the opportunity to find out more about the wide range of our businesses and the diversity of our professions. They're welcomed by Xavier Niel and the Group's executives, who answer any questions they may have. This informal meet-up epitomizes who we are – an organization where it's easy to reach out to managers and where reporting relations are kept simple.**



## 🔴 Looking after our employees' health

The health of our employees is an absolute priority for us, and has become even more so with the Covid pandemic. Our commitment to their wellbeing is clearly reflected in the high-quality healthcare coverage we provide and the measures we put in place to promote workplace health and safety.

As part of their salary packages, our staff in France are offered private healthcare benefits at prices that are competitive and fair for everyone, whatever their role in the organization. As well as providing a supplementary healthcare plan, we offer our people the possibility of taking out a top-up plan negotiated by the Group with high coverage levels.

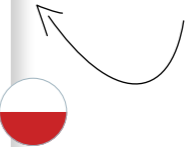
We have also set up a personal protection insurance plan available to all employees covering them in the event of death, disability and incapacity to work.

In addition, actions promoting workplace health and safety are regularly organized. For example, in 2022 our Polish subsidiary Play worked with an external provider to offer online exercise classes, self-massage workshops, and webinars on workplace ergonomics and work-life balance. We've also introduced an extra day's paid leave for our employees in Poland to be able to go to medical examinations and consultations.



## 🔴 Prevention: Play and UPC Polska take action

🔴 **In 2022, our Polish subsidiaries organized several prevention campaigns for their staff. In particular, they proposed a range of medical check-ups, such as breast-screening, skin examinations, and well-man check-ups.**



## Health and safety: constant vigilance

Ensuring the health and safety of our employees is one of the pillars of our corporate culture. We view each member of our team as a precious asset, and their wellbeing is paramount. We're determined to provide a safe working environment, particularly for those on the front line, ensuring that they can give the best of themselves in full confidence.

Our commitment to health and safety is underpinned by risk prevention. In France, our occupational health risk assessment report (Document Unique d'Évaluation des Risques Professionnels), which we update every year, forms the basis of our pro-active approach for preventing and managing employee health and safety risks.

We further strengthened our approach in 2022 by introducing risk exposure sheets at Free Réseau for all positions within the entity and signed by all the employees concerned. These sheets, which are available on our intranet, clearly illustrate our commitment to transparency in terms of health and safety.

Aside from documentation, safety at work is all about people. Our health and safety specialists work closely with occupational physicians and nurses to ensure that each workstation is assessed in the finest detail. They are also there to help our employees on an individual basis, for example by adjusting their working conditions when necessary and supporting them through difficult times.

Our health and safety policy is additionally built on training and raising the awareness of our people from the moment they join us and throughout their career with the Group. Our training plans are developed taking close account of our teams and their working conditions, to ensure that they reflect the reality of the work they do and all the risks inherent to it. In 2022, we organized over 100,000 hours of health and safety training for our employees in France.

Lastly we provide our teams with appropriate high-quality personal and collective protective equipment, such as harnesses and helmets, making sure that they have everything they need to work in total safety. In 2021, we launched an app to help manage and monitor this equipment and further strengthen our commitment to safety in all of our operating processes.

## 2022 employee survey for France

✚ In France, the Group's efforts to ensure optimal health and safety conditions have been recognized by its employees. According to our 2022 employee survey, 92% of the respondents think the health and safety conditions in their work are good - a score that has been steadily increasing for several years now.

92%  
à estimer que les  
conditions de sécurité  
au travail sont bonnes



## Working at height: a dedicated app for monitoring equipment

✚ In 2021, Free Réseau launched a mobile app to make it easier to monitor the safety equipment used for working at height. Not only does it facilitate the checks and follow-ups performed by managers, but it also triggers automatic orders for new equipment and requests for recycling old equipment.



## First-aid: Play named "Company of the year for 2022"

✚ In Poland, Play has a team of volunteer employees trained in first-aid who are called the "Play Heroes". In 2022, the Play Heroes took part in the Safe Tech Forum in Lomnica where they were able to enhance their first-aid skills. Also during the event, Play was named "Company of the year for 2022" in recognition of its work on health and safety, and on teaching and promoting first-aid.



Working environments that reflect who we are

Within the iliad Group we aim to make life easier, both for our subscribers and for our employees. So we seek to create working environments where everyone feels good and where there aren't any needless complications. To do this, we've adopted a pragmatic and people-focused approach designed to meet everyone's needs and foster wellbeing in the workplace.

Since 2018 we've invested each year in renovating our sites - from head office through to regional offices. And for each location, the focus is on comfort and creating warm and friendly relaxation and eating areas.

An app dedicated to employee wellbeing

Our Polish entity, Play, has recently launched the Mindgram app, a platform that gives employees access to psychological and self-development support.

Worklife quality is also extremely important to the Group. In France, Poland and Italy, we organize a range of in-house events involving meet-ups and discussions among our teams. We encourage flexible working arrangements, such as homeworking, and we emphasize the right to "disconnect" after working hours. And we also offer our staff awareness-raising sessions about how to achieve a good work-life balance, especially in today's context when working from home has given rise to new challenges in terms of social relations.



A new standard-setting head office for Free Pro in Marseille

In late 2022, Free Pro, the iliad Group's B2B subsidiary, moved into its new head office in Marseille in the heart of Smartseille, an eco-district that is a standard-setter for sustainable urban development. In addition to its remarkable energy performance, the entire building has been designed to encourage collaborative working, creativity and communication between Free Pro's different departments. And on the seventh story there's a purpose-designed meet-up space where people can get together and chat.



Free Proxi's premises are designed as real living spaces, with a large portion dedicated to break and eating areas to create a friendly and relaxing atmosphere.



Getting together is an integral part of iliad Italia's DNA!



In our Polish entities, Energizing Days are regularly held across our various sites for team members to spend time together.



Our Freebox teams in Paris take a break...



...as do our iliad Italia teams in Milan!



**Jakub**  
Radio Network Planning  
and Optimization Expert  
Play

## 04 For the environment


The Iliad Group has been taking action for 15 years now to limit the environmental impact of its operations. In 2021 we wanted to take this action to another level, by drawing up and launching an ambitious Climate Strategy. And all of our teams are working hard every day to make sure we keep to the environmental pledges we've made.

# Key facts and figures\*


Our three GHG emissions scopes

Scope 1	Scope 2	Scope 3
<ul style="list-style-type: none"><li>▶ Vehicle fleet</li><li>▶ Air conditioning</li><li>▶ Electricity generators and refrigerant gas</li></ul>	<ul style="list-style-type: none"><li>▶ Networks</li><li>▶ Data centers</li><li>▶ Buildings and other</li></ul>	<ul style="list-style-type: none"><li>▶ Our subscribers' Freeboxes</li><li>▶ Fixed and Mobile network equipment</li><li>▶ Our subscribers' mobile devices</li><li>▶ Transportation of Freeboxes</li><li>▶ Employee travel and commuting</li></ul>

Breakdown of our Scope 1 & 2 emissions

	Scope 1	Scope 2
	<b>5.5%</b> Vehicle fleet	<b>85.5%</b> Networks
	<b>1.4%</b> Air conditioning	<b>4.7%</b> Data centers
	<b>0.1%</b> Electricity generators and refrigerant gas	<b>2.8%</b> Buildings and other
	<b>Total</b>	<b>Total</b>
	<b>7%</b> of emissions	<b>93%</b> of emissions

Breakdown of electricity use by our network infrastructures

	Mobile network	FTTH network
	<b>72.3%</b>	<b>5.3%</b>
	<b>7.9%</b> ADSL network	<b>5.1%</b> Core network
	<b>9.4%</b> Data centers	

\* At end-2022.

# 04 For the environment



## An ambitious Climate Strategy

The Iliad Group has been working for many years now on limiting the impact of its business activities on the climate. But because of our strong growth, we realized that if we didn't make an extra effort we would be faced with an increase in our carbon emissions. That is why we drew up and adopted an ambitious Climate Strategy aimed in particular at reducing by as much as possible the carbon intensity of our networks.

▶ January 21, 2021, a key date

Over the past 15 years, the Iliad Group has worked hard to reduce the environmental footprint of its activities in France, including its Fixed and Mobile networks, data centers and the logistics processes used for producing its Freeboxes. But two years ago we decided to go even further as we realized that in view of the ongoing increase in data traffic, along with growth in our subscriber

base, and our geographic diversification, our carbon emissions would double by 2050 if we didn't make an extra effort.

So on January 21, 2021, we announced our Climate Strategy – the outcome of two years' work involving some 80 employees – underpinned by 10 pledges that all of us at Iliad signed up to.

Our aim is to contribute to global carbon neutrality in three main steps:

By 2021	By 2035	By 2050
<b>100%</b> of the Group's energy certified as derived from renewable sources	<b>Net Zero</b> for direct emissions – 15 years earlier than the Paris Agreement target (our Scope 1 & 2 emissions)	<b>Net Zero</b> for our main indirect emissions* (our Scope 3 emissions)

\* Equipment and electricity used by subscribers' Freeboxes and mobile devices, active fixed and mobile network equipment, roaming.

# Our 10 climate pledges



## No.1 Invest €1 billion over 15 years to meet our objectives

- Draw on all necessary financial, technical and human resources



## No.3 Ensure our data centers have advanced environmental performance

- Extend the lifespans of our equipment to up to 10 years
- Include information about energy use and carbon emissions in our customer invoices



## No.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 Centers
- Support non-profit organizations that collect e-waste for reuse and recycling



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

- Have 25% electric vehicles by 2025
- Set up a fleet telematics system
- Target: average of 20g CO<sub>2</sub>/km by 2035



## No.9 Invest in carbon sinks

- Develop projects in France and Italy
- Obtain Low Carbon label for all projects in France by 2035



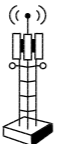
## No.2 Improve the energy efficiency of our Fixed and Mobile networks

- Switch to Fiber and 5G, two energy-efficient technologies
- Optimize our network equipment



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

- Eliminate air freight from our supply chain except where absolutely necessary
- Set up a Life Cycle Assessment process to eco-design our Freeboxes
- By 2025, reduce our subscriber base's energy use by at least 15%



## No.6 Deploy a responsible procurement policy

- Set up a work group with our equipment manufacturers to reduce the energy consumption of our mobile equipment
- Work with electronic component manufacturers to limit the energy consumption of our Freeboxes



## No.8 Help create more renewable energy capacity

- By 2035, 50% of energy supplies in Italy and Poland and 20% in France provided under PPAs with renewable energy producers
- Support the renewable energy sector



## No.10 Set up a climate performance tracking system

- Put in place a system for communicating our climate performance, based on a set of indicators



## A responsible sales strategy

► Camille Perrin, Chief Marketing Officer at Free, takes a look at the choices the Group has made as part of its responsible sales strategy and presents our climate pledges in this domain.



## Improving the energy efficiency of our Fixed networks

► Ombeline Bartin, Chief Public Relations Officer at Free, explains the Group's targets for reducing the energy used by our ADSL and Fiber networks.



## Mobile networks: reducing energy consumption per gigabyte

► Bertrand Fievet, Head of Radio Engineering at Free, describes the current increase in data traffic on our Mobile networks and the solutions used for reducing their energy consumption per gigabyte.



## Containing the environmental impact of Freeboxes

► Hugues Floch, Head of Procurement and Production at Freebox, talks about the measures taken by the Group to limit the environmental impact of its Freeboxes and the commitments we're making to go even further.



## Data centers with advanced environmental performance

► Arnaud de Bermingham, Chairman of Scaleway, explains the Group's CSR strategy regarding the management of data centers and presents DC5, our Paris data center that doesn't need air conditioning.



► A Climate Strategy that covers all of our geographies

Following the announcement of its Climate Strategy in early 2021, the iliad Group completed two strategic acquisitions in Poland – the mobile operator, Play, in 2021, and the fixed-line operator, UPC Polska, in 2022.

Straightaway, we launched a major project to incorporate our newly acquired Polish operations into our Climate Strategy. Consequently, the Group's 2022 reporting scope for carbon emissions also includes Play and UPC.

Our teams are now transferring the emissions reduction expertise we have developed in France and Italy to our newcomer entities, therefore enabling us to contribute to the global climate transition.

3.9kg  
Average amount of CO<sub>2</sub>eq emitted per Group subscriber in 2022



Play and UPC Polska teams at a meet-up in Warsaw on April 4, 2022.

► 1.5°C-aligned science-based target, to be achieved by 2030

The Science-Based Targets initiative (SBTi) has become the number one international standard for companies to set credible objectives for combating climate change.

This global organization encourages corporations to set ambitious targets for reducing their greenhouse gas emissions in line with the goals of the Paris Agreement, i.e., limiting global warming to 1.5°C above pre-industrial levels. In 2021, in accordance with the SBTi's recommendations, we undertook to submit and adopt emissions reduction targets, and our carbon emissions reduction pathway was sent to the SBTi for official validation in the second quarter of 2023. This pathway includes targets for reducing our absolute emissions in the short term (2030) and the long term (2050).

The Group's in-house climate action plans will be updated to incorporate these targets once they have been validated.



The iliad Group joins EpE

► At end-January 2022, the Group joined EpE, a non-profit organization that counts some 60 major French and international corporations who work together to better integrate environmental issues into their strategies and operations. Being a member of EpE means that we can adopt best practices by learning from the experience of other members as well as anticipating new standards and market developments.

Our 2022 carbon emissions report

The Greenhouse Gas (GHG) Protocol contains two methods of accounting for carbon emissions: the market-based method and the location-based method. 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 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.

tCO <sub>2</sub> eq	2021 (incl. UPC Polska over 12 months)	2022 (incl. UPC Polska over 12 months)	Year- on-year change
Scope 1	22,615	24,093	7%
Scope 2 (Location-based)	270,407	320,392	18%
Scope 2 (Market-based)	190,406	149,826	-21%
Total 1+2 (Location-based)	293,023	344,485	18%
Total 1+2 (Market-based)	213,021	173,919	-18%
Main Scope 3 emissions*	877,766	909,634	4%
Other Scope 3 emissions (Location-based)	101,431	116,688	15%
Other Scope 3 emissions (Market-based)	76,040	77,122	1%
Scope 3 (Location-based)	979,197	1,026,323	5%
Scope 3 (Market-based)	953,806	986,756	3%

\* Main Scope 3 emissions (from equipment and electricity used by Freeboxes and mobile devices, active fixed and mobile network equipment, and roaming), which accounted for around 90% of Scope 3 emissions in 2022, increased by just 4% as calculated by the location-based method and by 3% using the market-based method, despite an increase in data use and growth in our subscriber base.

## A responsible sales offering

What is a responsible telecom operator?  
For the Iliad Group, it starts by having a sales offering with a contained environmental impact.

### ► Free Mobile – a committed operator from the outset

Ever since its launch in 2012, Free Mobile has always been against the idea of “subsidized” phones. This sales approach consists of offering customers a smartphone at a reduced price, but then linking the purchase to a mobile plan that’s more expensive and longer than plans that don’t include a phone – usually for 12 or 24 months. We believe that this practice encourages people to change their mobile phone more often than they need to, which therefore has an impact on the environment. Our decision not to use this system means we’ve stood out from France’s other telcos right from the start.

In July 2021 we broke new ground by launching Free Flex, an innovative offering that enables people to purchase a mobile phone without using the “subsidized” model. With Free Flex, our subscribers can purchase a phone by spreading out its price at no extra cost, via leasing with a purchase option, while keeping a no-commitment plan. Their Free mobile plan stays at the same price and their monthly airtime payments are totally separate from the lease payments for the phone. They can purchase their phone at any time. And after 24 months they can choose to either return their phone or buy it at that stage.

The price of the phone is spread over 24 months at no extra cost, and if the subscriber decides to purchase it, they won’t end up paying more than if they’d bought it up front. All phones that are returned are reused or recycled via our circular economy partners.

So with Free Flex, subscribers are not encouraged to get a new phone before they need to, as the price of their plan stays the same with or without a phone.

### ► Fixed-line business: increasingly energy-efficient products that are made to last

The products designed and marketed by the Iliad Group in France and Italy are made to last. All of our boxes are designed in-house by our own R&D teams, which means that we can control and optimize the entire manufacturing process. For example, we choose the best plastics for the boxes’ casings to guarantee their durability. As a result, our Freeboxes have a minimum lifespan of ten years. The boxes returned to us by our customers are checked, repaired and restored to as good as new before being reintroduced into our production and sales circuits. There’s no programmed obsolescence in our Group!

From one version of a box to the next, we work on reducing their energy consumption. Compared to their equivalent models – i.e. the Freebox Revolution and the mini 4K – the Freebox Pop and the Iliadbox use 40% less energy but are five times more powerful.

Our teams also give our subscribers ways to more effectively manage their use of electricity. For example, using the Freebox Connect app in France and the Iliadbox Connect app in Italy, in just a few clicks they can set custom schedules to switch off WiFi at certain times.

Another example in France is the Freebox Revolution TV Player, which has a “deep-sleep” mode enabling electricity consumption to be reduced to less than 0.5 Wh, i.e. 30 times less than when it’s switched on.

### ► A strict policy for packaging

In its three geographies, the Iliad Group has set up a strict policy for product packaging.

Our Freebox teams, in charge of designing and making Freeboxes for France and the Iliadbox for Italy, work hard to radically reduce the amount of single-use plastic packaging deployed in the supply chain. Our manufacturing centers are instructed to systematically reuse plastic packaging and we also actively encourage our suppliers to deliver their components in as little plastic wrapping as possible.

The same responsible policy is applied to the packaging for our boxes. For instance, for the Freebox Pop and the Iliadbox, our teams have worked to reduce the size and quantity of the boxes’ packaging. For their outer cardboard packaging and inner cushioning components, we use recyclable products with only moderate amounts of ink and finishing coats.



The outer cardboard packaging of the Freebox Pop.



The outer cardboard packaging of the Iliadbox.

In Poland, Play’s teams have completely rethought the company’s product packaging. Outer cardboard packaging has been adapted to the size of the products in order to use fewer raw materials and optimize transportation. And plastic has been completely eliminated, including adhesive tape which has been replaced by kraft paper. These initiatives have made it easier for subscribers receiving the products to recycle their waste packaging, by simply putting it in paper and cardboard recycling bins rather than having to separate out different types of materials. Every day, Play’s teams in charge of product logistics take great care not to waste anything, for example by systematically reusing the cardboard boxes received from their suppliers.



### Free Flex, a responsible offer with no hidden costs

⊕ Since July 2021, the Free Flex offer has freed people from having to replace their mobile phone before they need to.



### Packaging revisited in Poland

⊕ Our teams in Poland have completely rethought the company’s product packaging in order to use fewer raw materials and facilitate recycling.

# Improving our energy efficiency

The majority of our Scope 1 & 2 emissions derive from the operation of our telecom networks (85.5%) and our datacenters (4.7%). Increasing the energy efficiency of our infrastructures – which entails reducing their electricity consumption – is therefore a priority for us.

90.2%  
Proportion of our Scope 1 & 2 emissions that derive from our networks and data centers

## Fixed network: focus on fiber

Regarding its Fixed network, the Iliad Group is working hard to accelerate fiber take-up in its three geographies, in view of the fact that an FTTH (Fiber To The Home) line uses four times less energy than an ADSL (Asymmetric Digital Subscriber Line).

In France, the Group systematically encourages all eligible subscribers to switch to fiber, at no extra cost to them, and over 70% of our subscriber base is now fiber-connected. At end-2022, the Group had the highest fiber take-up rate of all of France's telcos. At the same time, we're calling for the copper network to be shut down more quickly than currently planned, and in view of the upcoming shut-down of ADSL networks, we're working to optimize the electricity used by the equipment we have in place, notably by disconnecting and miniaturizing DSLAMs (Digital Subscriber Line Access Multiplexers).

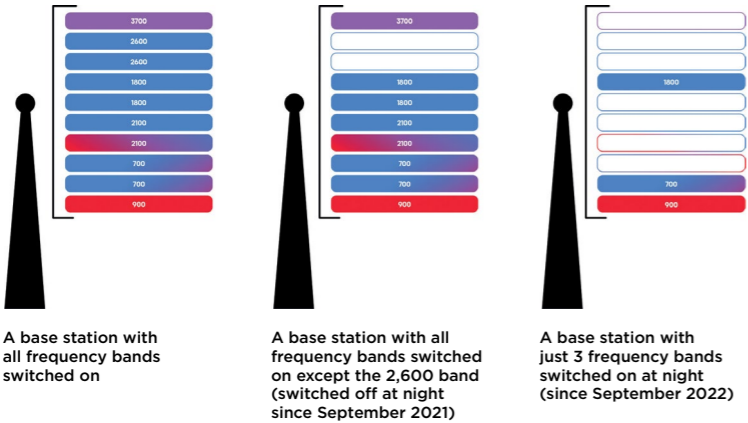
When we launched our Fixed-line business in Italy in January 2022, we chose to only offer fiber technology. And in Poland, following our acquisition of the fixed-line operator UPC Polska, we set up a FiberCo with a view to becoming the country's largest fiber operator.

## Mobile network: an innovative new initiative

For our Mobile network, we are investing massively in rolling out 5G, which will enable electricity consumption to be more effectively managed as network usage increases.

In parallel, our French mobile teams have put in place an innovative solution to significantly reduce the amount of electricity used by the network. In September 2021, they switched off the 2,600 MHz frequency band for 4G at night on Free Mobile's network. And then in 2022 they went further, also switching off the 2,100 MHz band for 4G, the 2,100 MHz band for 3G and the 3.5 GHz band for 5G at night. This reduces the base stations' electricity consumption by more than 10% during the time the cells concerned are switched off, without impacting either network usage or service quality. The cells that are switched off come back on automatically if needed in terms of network traffic. This initiative has been successfully extended to Italy and will be continued in 2023.

For the frequencies that remain switched on at night, our teams in France and Italy are also reducing the number of simultaneous transmitters on the same band (MIMO reduction), which means that the amplifiers can be cut on the bands concerned.



## Mobile networks: energy consumption reduced at night

⊕ The cells that are switched off come back on automatically if needed in order to maintain optimal quality of service.\*



\* Based on data published by the telcos as at July 17, 2023.



For our mobile network in Italy we applied the “night switch off” solution created by our Free radio engineering teams in France so as to significantly reduce energy consumption while maintaining the same service quality. This sharing of best practices between countries is a real strength of our Group!

Emanuele  
Head of Radio Network Engineering  
Iliad Italia

► **Data centers:  
Sustainable management  
of natural resources**

The Iliad Group currently operates 15 data centers: 8 in France via its subsidiaries Scaleway and Free Pro, and 7 in Poland via its subsidiary 3S. Having signed up to the European Code of Conduct for Data Centers back in 2012, in its Climate Strategy the Group pledged to ensure that its data centers have advanced environmental performance (pledge No. 3). We therefore made the teams in our hosting subsidiaries aware of the environmental issues to be addressed, and set them the objective of maximizing the energy efficiency of all of our data centers

In France, the hosting business of our subsidiary, Scaleway – which accounts for most of the electricity used by the Group's data centers – is ISO 50001 certified. This certification, which recognizes the quality of our data centers' energy management system, was renewed in 2021, testifying to the effectiveness of our continuous improvement measures.

In addition, Scaleway has set itself an ambitious PUE<sup>1</sup> target for 2025, namely to have a PUE ratio of less than 1.2 for its data centers with an adiabatic cooling process, and less than 1.35 for those with a traditional cooling system. This represents an incremental efficiency gain of 30% compared with the weighted industry average of 1.55<sup>2</sup>. In order to meet this target, our teams are working on continuously improving cooling systems and upgrading primary infrastructure through the use of highly energy-efficient equipment.

Target:  
**30%**  
reduction in  
our data centers'  
PUE<sup>1</sup> ratio

**Water consumption:  
a crucial indicator**

➤ Energy use is not the only indicator to be taken into account in order to sustainably manage a data center. The centers' cooling systems use large quantities of water – a natural resource that is increasingly becoming a precious commodity in today's context of global warming. That's why Scaleway has set itself the objective of not just using PUE<sup>1</sup> as a sustainability metric but also WUE (Water Usage Effectiveness), which is measured by dividing the amount of water used (in liters) for the cooling system by the amount of electricity used (in kWh) for the services provided by the data center.



**Adiabatic cooling process:  
a unique innovation in Europe**

➤ In Saint-Ouen l'Aumône, located just outside Paris, the Iliad Group has developed a data center model that is particularly efficient in terms of electricity and water usage. Called DC5, this data center has an adiabatic cooling process, which incorporates evaporative and air cooling into a single system using the evaporation of a very small quantity of water to lower the temperature inside the server room when outside air temperatures are high. Combined with the use of outside air to cool the servers, the system avoids the need for air conditioning and means the data center consumes 30%-40% less electricity compared with a traditional data center, and uses 9 to 10 times less water than systems with open cooling towers.

In order to be as transparent as possible, Scaleway publishes the energy indicators for its data centers in open data format on its website. And to raise the awareness of its customers, Scaleway states on their invoices the energy use, water use and estimated carbon emissions for each product invoiced.

In addition, in line with the Kyoto Protocol and EU Directive 2003/87/EC, Scaleway has launched a plan to gradually replace sulfur hexafluoride (SF6). This gas is currently still used in certain traditional electrical switchgear, which will be replaced by vacuum switchgear by 2026.

In Poland, the data centers operated by 3S have undertaken measures to reduce the carbon impact of their activities, mainly by working to make their equipment more energy efficient.

Most of the air conditioning systems installed in the 3S data centers run on free cooling – a method that consists of using external air temperatures as a cooling source when these are lower than inside the building.

The data centers' UPS (uninterruptable power supplies), which protect data and equipment if there is a power outage, were selected for their energy efficiency and based on their environmental performance across their entire life cycle as stated by their suppliers. The 3S data centers have solar panels and the energy produced is used by the centers. This reduces the amount of electricity drawn from Poland's national grid, which is more carbon intensive than the grids in France and Italy.

► **Our energy saving plans**

In Fall 2022, for the first time in decades, Europe experienced an off-the-scale energy supply crisis, and governments asked their citizens to try and save energy to face the winter months.

As a signatory of the EcoWatt charter, and having already put in place extensive measures to improve the energy efficiency of its infrastructure as part of its Climate Strategy, the Group responded to this call by publishing detailed energy saving plans in France and Italy, in which it undertook to implement extra measures in order to go further and faster.

Two additional action areas adopted voluntarily by the Group were incorporated into the plans, with immediate effect.

**Optimizing energy consumption:**

- By turning down heating by two degrees and limiting the use of air conditioning in our offices, stores and other buildings in France.
- By reducing exterior lighting times and the periods of time when advertising and display screens outside our stores are lit up in France and Italy.



- By improving the energy performance of our buildings and putting in place new tracking systems and processes to more effectively monitor energy use in our offices in France and Italy.

**Raising awareness among employees  
and subscribers and providing subscribers  
with tools to control their energy use:**

- The Group has pledged to help its employees and subscribers reduce their energy consumption by sending out targeted communications containing advice on easy eco-friendly habits they can adopt to reduce their energy consumption.
- We already provide our subscribers with several tools for reducing their energy consumption – for example they can schedule times to turn off Wi-Fi via the Freebox Connect app in France and the Iliadbox Connect app in Italy. And we'll be doing even more, thanks to the Energy Saving menu that we're going to activate on certain Freeboxes in France so that subscribers can rapidly access the settings for optimizing the energy consumption of their Freebox TV Player. This will enable them to put their Player into deep sleep mode when it's not being used, which will reduce its electricity usage by 95%.

<sup>1</sup> Power Usage Effectiveness: indicator used to measure data center energy efficiency.  
<sup>2</sup> Source: Uptime Institute's 2022 Global Data Center Survey.

## Promoting the circular economy

The circular economy offers ways of rethinking our production and consumption models in order to optimize the use of natural resources and reduce waste. Repair, refurbish, recyle, refuse and reduce: we're incorporating this approach more and more into our businesses across our three geographies.

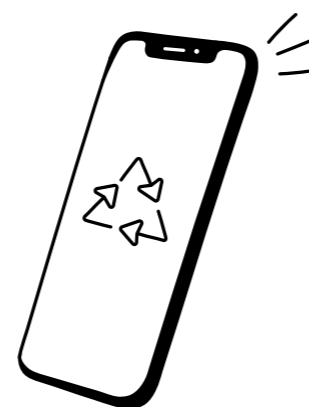
### ► Promoting refurbished mobile phones and encouraging recycling

In Europe, the market for refurbished phones is growing fast. In France, the iliad 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. The Group works closely in France with two specialists in this area, PRS and Recommerce.

The launch of Free Flex in 2021 has enabled us to promote refurbished phones more widely among our subscribers, and in 2022 they made up nearly 10% of our total sales of phones compared with 5.1% in 2020. In 2022, we went further, by signing a partnership agreement in June with CertiDeal, a leader in France's refurbished smartphone market, in order to provide our subscribers with a broad offer of refurbished smartphones at the best prices in the market. Over 1,000 product references refurbished in France are proposed on the CertiDeal platform, all tested and certified and which come with a 24-month warranty, and Free Mobile subscribers get a 5% discount.

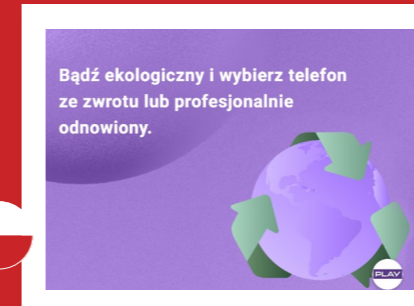
In Poland, our teams have recently launched a trade-in program for smartphones in good working order, with a view to refurbishing them. They've also launched a second hand smartphone offering. The refurbished mobile phone market is still nascent in Poland, but the Group is driving changes in consumer habits and we expect to see the emergence of new demand for these products

In parallel, to raise awareness among our prospects and subscribers, we've installed drop-off boxes for used mobile phones and accessories in all of our stores in France and Poland. The boxes are placed where people can see and access them easily.



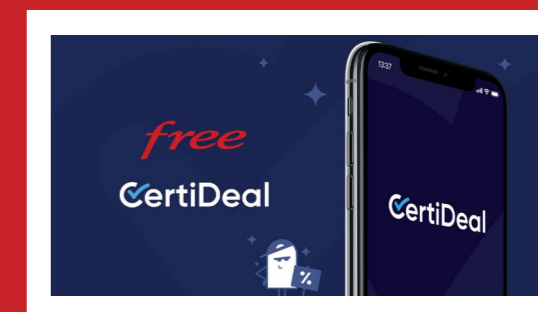
In France, when our sales advisors are given their induction training, they follow a specific module on explaining to our store visitors how they can drop off their used devices.

The Free Foundation – the initiator of the project – has teamed up with Ateliers du Bocage, a non-profit organization which is a member of the Emmaüs charity network, for the phones that are dropped off to be recycled or reused. Phones that are no longer in working condition or which are obsolete are recycled by approved providers, and those that still work are repaired and redistributed free of charge. And the system also contributes to the inclusion programs of Ateliers du Bocage, which employs disadvantaged jobseekers and people with disabilities.



### Play launches its refurbished mobile phone offering

➤ In Poland, Play is following the same course as the Group and is anticipating upcoming consumer trends in the country.



### Signature of a partnership agreement with refurbished phone specialist, CertiDeal

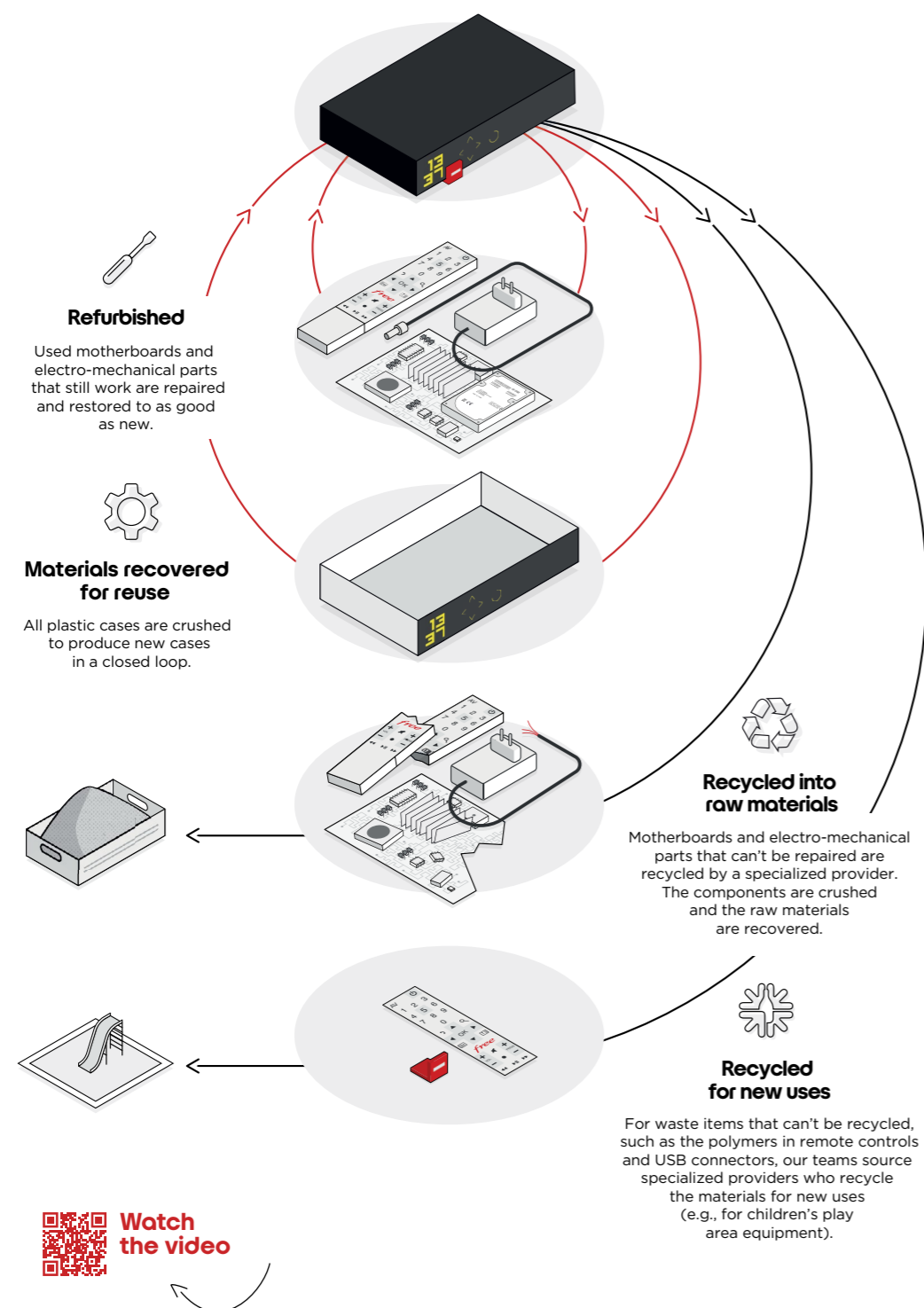
➤ CertiDeal is a French company that has its own network of specialists. By verifying, testing, repairing and reselling mobile phones, it extends their lifespans and helps reduce the environmental impact of their manufacturing process.



### Drop-off boxes in all our stores in France and Poland

➤ In line with our climate pledge No. 5, we have already equipped all of our stores in France and Poland with drop-off boxes for used phones and accessories. At end-2022 this corresponded to some 700 stores in Poland and 190 stores in France.

## The Freebox Revolution, a textbook example



### Products: circular economy principles at the center of all our processes

The manufacture of our Freeboxes in France and our iliadboxes in Italy have always been designed and led in-house by a dedicated entity.

Thanks to this specific operating method, which sets us clearly apart from other operators, we are now in a position to control our products' design and optimize each stage in the production process in order to extend their lifespans while also making it easier to refurbish or recycle substantially all of their components. And in so doing, we're also giving maximum value to components that already have significant added value.

For each new generation of our boxes, we focus on making the products more compact and reducing the quantity of materials used in their manufacture. For example, production of the Freebox Pop box requires just a quarter of the material used for the Freebox Revolution.

Freebox also applies a modular design approach, enabling certain electronic components to be upgraded to the latest market standards without

**2,000**  
tonnes of  
waste recycled  
in 2022

replacing the equipment. For instance, the box can be opened up to remove the WiFi card and our teams can replace it with a new card meeting the latest standards without having to change the whole device. 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 performance standards.

Our boxes are also designed from the very outset in such a way as to make it as easy as possible to repair and restore most of the components to as good as new, by choosing easily repairable materials and suitable assembly techniques. In practice, this means for example avoiding the use of glue to assemble parts, which would make repairing them much more difficult.





At Freebox we've set up specific organizational processes for reaching our environmental objectives. I was put in charge of overseeing these processes in terms of our production activities, in close relation with all of our supply chain operations. It was a role I gladly took on as I firmly believe that in our company we know how to act quickly and effectively!

**Iris**  
Supply Manager

All repairable motherboards and electro-mechanical parts (connection cables, remote controls, power supply units, other accessories, etc.) are repaired and restored to as good as new. 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.

Damaged motherboards and accessories that can't be repaired are sent to approved recycling firms to be recycled into raw materials. All of our specialized industrial recycling partners are based locally, in France or Belgium.

By designing products with their entire life cycle in mind, our teams are able to refurbish 90% of the boxes returned to us by subscribers. The 10% that cannot be restored to as good as new are boxes that have been seriously damaged (for example boxes whose casing has been broken, or that have suffered water damage).

Apart from these exceptional cases, as a general rule our boxes – Freeboxes and iliadboxes – can last for at least ten years, and in fact they can be refurbished as many times as necessary for as long as they continue to feature in our commercial offers.

### A structural principle: zero waste to landfill



⊕ Certain materials such as foam and polymers cannot 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, requires us to find appropriate solutions for recycling each material. Here are a few recent examples:

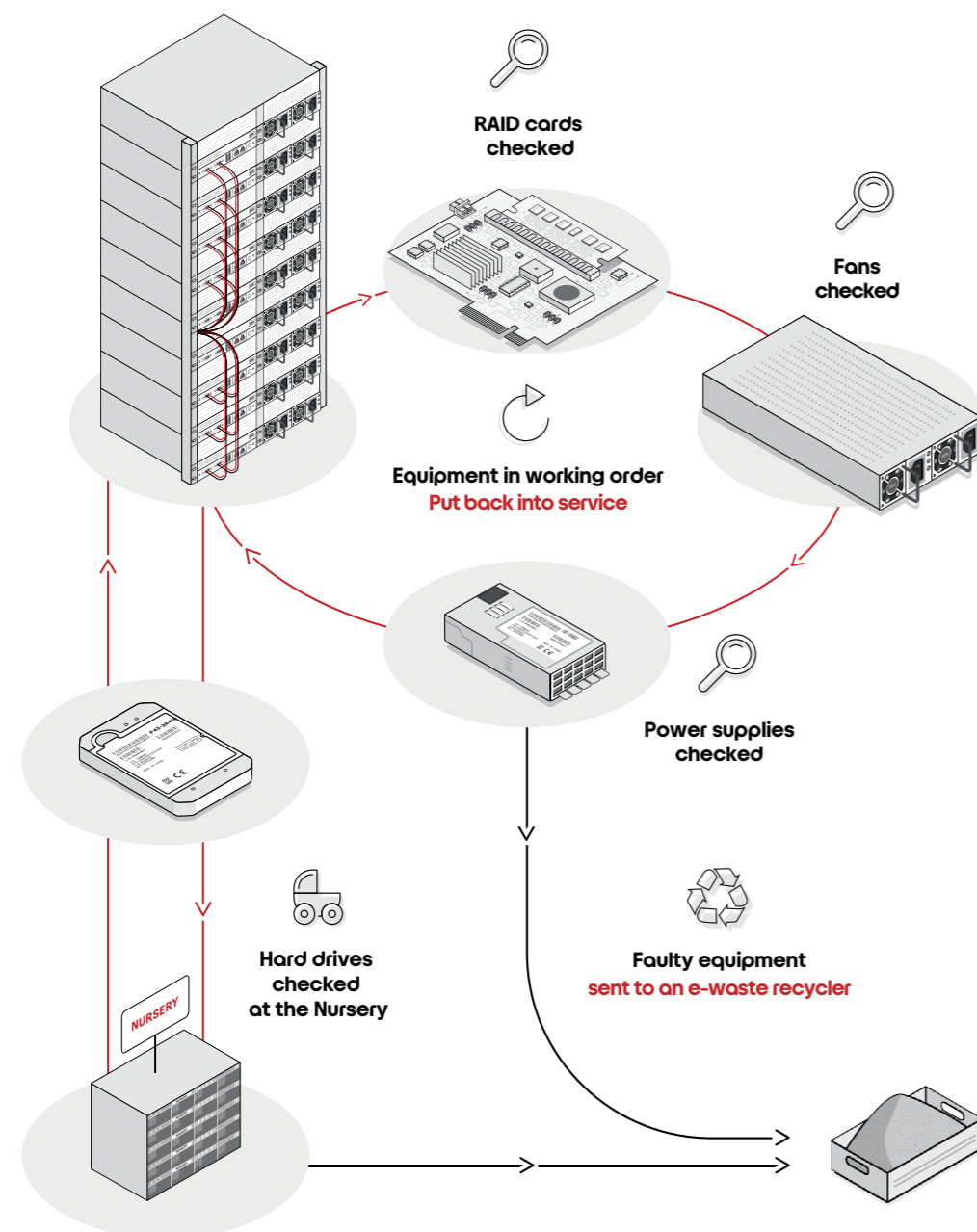


⊕ In 2021, our teams came up with an innovative solution to the problem of recycling eight tonnes of expanded polyethylene foam contained in returned products developed in France over ten years ago. They were recycled into synthetic football pitch underlay by a specialized partner located in the Netherlands.



⊕ 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.

## The Transformers and Nursery programs



### ► Data centers: extending the lifespans of servers and hard drives

Scaleway, our entity dedicated to Cloud offerings, has developed two circular economy programs to extend the lifespans of servers and hard drives. The manufacture and use of servers have a significant impact on the environment<sup>1</sup>.

In 2019, the “Nursery” program was launched in order to maximize the lifespan of hard drives. 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 an approved service provider.

On average, 50% of our hard drives can be reused after their first life cycle. In all, 18,500 drives have been refurbished in the last three years, which represents around 575 tonnes of CO<sub>2</sub> saved<sup>2</sup>.

In 2021, following the release of the Group’s Climate Strategy, we launched the “Transformers” project for Dedibox, Scaleway’s long-standing offer of dedicated servers. The aim is to process at least 10,000 servers every year that have come to the end of their natural lifespan.

The Dedibox servers are taken apart, their hard drives removed, and their different components (power supply, fans and RAID cards) checked.

**8,880**  
tonnes of CO<sub>2</sub>eq  
saved in 2022  
thanks to  
the Transformers  
program

All equipment in good working order is then put back into service and faulty equipment is sent to an approved e-waste recycler.

14,000 servers went through this process in 2022 and 80% of them are now being reused, representing some 8,800 tonnes of CO<sub>2</sub> equivalent saved<sup>3</sup>. With this program, Scaleway is able to extend the lifespan of its servers to up to 10 years, whereas they’re usually thrown away after 3 or 4 years.

The Transformers program has also been launched for other Scaleway Cloud offerings.

While reusing hard drives is already a widespread best practice among Cloud players, refurbishing servers is purely a Scaleway initiative, with no equivalent in its sector.

<sup>1</sup> Based on a joint ADEME-ARCEP study dated January 19, 2022, which estimates that data centers represent between 4 and 20% of the environmental impact of the digital sector. This study highlights the “predominant impact of servers”, both in terms of their manufacture (accounting for an estimated 15 to 30% of their carbon footprint) and their use.

<sup>2</sup> Source: Carbone 4 for Scaleway.

<sup>3</sup> Compared with the manufacture of a new storage device, sorting and reusing existing devices allows savings ranging between 50kg CO<sub>2</sub>eq and 650kg CO<sub>2</sub>eq per reused device. Data calculated using the PAIA model, based on inputs by the manufacturer plus data from the European Commission’s Joint Research Centre as well as data from studies carried out by Facebook, Harvard and the University of Arizona.

## Contributing to global carbon neutrality

The Iliad Group is working hard to contribute as much as it can to global carbon neutrality. Our efforts to achieve this include purchasing renewable electricity with guarantees of origin, reducing the emissions generated by our vehicle fleet and supply chain, and investing in carbon sinks and new renewable energy capacity.

**100%**  
of the electricity  
purchased by  
the Group as  
at end-2022 was  
from renewable  
sources

### ► Target: 100% renewable energy

In line with our stated commitments, by 2021 all of our direct electricity use in France and Italy was covered by purchases of renewable energy with guarantees of origin. But we wanted to go further, so we extended this target to Poland, where electricity is 17 times more carbon intensive than in France. By the end of 2021, 50% of our electricity supply in Poland came from renewable sources and we reached the 100% target in 2022. Going forward, our focus will be on purchasing carbon-free electricity, prioritizing Poland and Italy.

But that's not all. We're going the extra mile by applying exacting and rigorous sustainability criteria, such as:

- Only working 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, and only using solar and wind power, enabling us to contribute to energy transition in France and the rest of Europe.
- Relying on the international not-for-profit energy ecolabel, EKOenergy, so we can minimize our impact on biodiversity and take part in new green energy projects worldwide.

By keeping this 100% green energy pledge, the Group has already significantly reduced its Scope 2 emissions. For example, in 2021, 650 GWh of guaranteed renewable origin electricity was supplied, avoiding the emission of some 138,000 tonnes of CO<sub>2</sub>, or the equivalent of one year of carbon emissions from a town with 11,500 inhabitants (such as Arcachon in France).

### ► Signature of our first PPA

Towards the end of 2022, the Group signed off on its first Power Purchase Agreement (PPA) in France with its partner, ENGIE. Announced in early 2023, this agreement will enable the Group to purchase, over a period of 15 years, the electricity generated by the Labrit solar farm located in the Landes region in south-west France. With 60,000 solar panels, it's estimated that the Labrit solar farm will produce more than 20 GWh of electricity per year, which corresponds to the electricity consumed by more than 1 million of our subscribers in France due to their use of the network.

The Labrit project is a long-term sustainable and environmentally-friendly project on several counts. From its creation through to its decommissioning, the solar farm will meet the criteria of the TED label (Transition Énergétique Durable, meaning Sustainable Energy Transition), designed jointly

**With the Labrit PPA, the Iliad Group is supporting the renewable energy industry**

► By purchasing electricity generated by the Labrit solar farm, the Iliad Group is participating in the creation, development and use over the long-term of more renewable energy production facilities in Europe, in line with its climate pledge No. 8.

by ENGIE and Bureau Veritas. This label is based on a framework of transparent commitments for deploying renewable energy production facilities that are integrated into their regional environments.

The facilities' end of life is already planned. The duration of the PPA is 15 years, but the lifespan of the solar panels is much longer: 95% of a silicon solar panel can be recycled and will be recycled at the end of its life. France is the first country in Europe to have set up a special eco-organization, called Soren, dedicated to collecting and processing used solar panels.

The Labrit solar farm will also form part of an overall program launched by ENGIE in the Landes region to work with local shepherds on ways they can rear sheep on its solar farms, and with local bee-keepers on setting up hives there.

Lastly, throughout the project, measures will be taken to protect biodiversity and the land at the site: for example, an ecological calendar for the works and ecological monitoring of the construction site, setting up a 1.5 hectare ecological reserve on the project site, and pesticide-free soil management.

The Labrit PPA is just the first step for the Iliad Group, as we aim to source at least 20% of our electricity in France via PPAs by 2035 and to accelerate the deployment of this type of project in Poland and Italy.



Watch the video

**The Bois de l'Abbaye low-carbon project in Grand-Pressigny**

► In the southern part of the Touraine region in central France, in the commune of Grand-Pressigny, in 2021 the Iliad Group fully financed the reforestation of 21.8 hectares. 27,600 trees of nine different species were planted, representing 5,850 tCO<sub>2</sub>eq. captured over the next 30 years.



► The Iliad Group discloses the carbon pathways of its three geographies to independent bodies, such as the Carbon Disclosure Project (CDP). These bodies are the guarantors of our climate action.

### ► Launch of our first carbon sinks in France

In line with our climate pledge No. 9 (contribute to global carbon neutrality), in 2021 the Group rolled out its first carbon sink projects in France, using the government's National Low Carbon Strategy as the reference framework.

Four reforestation projects were launched during the year:

- **Bois de l'Abbaye**, covering 21.8 hectares in Grand-Pressigny (Centre-Val de Loire region)
- **Bois de la Croix-Verte**, covering 5 hectares in Corcoué-sur-Logne (Pays de la Loire region)
- **Vergers de Châteauneuf**, covering 8 hectares in Châteauneuf-du-Rhône (Auvergne-Rhône-Alpes region)
- **Bois de Saint-Clair**, covering 4 hectares in Donnay (Normandy)

Selected because they bring combined benefits in terms of local employment, land preservation and biodiversity, taken together, the projects supported by the Group represent a total surface area of 40 hectares, with more than 45,000 trees planted and an estimated 8,000 tonnes of CO<sub>2</sub> captured.

Through this investment, the Group is taking immediate action to contribute to the development of a large number of carbon sinks in France and to land preservation. An annual monitoring system has been put in place for the projects to ensure that they are effective.

► **Vehicle fleet:  
a key lever**

Our vehicle fleet represents the main lever for reducing our Scope 1 emissions. In order to fulfill our climate pledges, we're aiming to reduce the emissions generated by the fleet Group-wide (calculated in grams of CO<sub>2</sub>eq/km).

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 our business growth in Europe, the number of vehicles in our fleet decreased significantly in 2022 and at the year-end we had a total of 5,900 vehicles (combustion engine and electric) for the Group as a whole. We intend to continue this optimization strategy in 2023.

At the same time, we're working on renewing our fleet. For example, we recently replaced a large portion of the fleet in France, selecting vehicles with engines that emit fewer fine particles (NOx). We're also adding more and more electric vehicles, with EVs totaling 220 in France at end-2022 (4.7% versus 2.7% in 2021). And in Poland, Play has begun to switch to a greener vehicle fleet, with some 150 hybrid cars at end-2022.

For emissions generated by non-electric vehicles, we've set a cap of 140g CO<sub>2</sub>eq/km.

**5,900**  
vehicles  
(combustion  
engine  
and electric)

We're standing by our objective of electric vehicles making up 25% of the Group's fleet by 2025, as stated in 2021 in our climate pledge No. 7.

In France, we've put in place an IT system for scheduling the appointments and travel time of our technicians throughout the country in order to optimize and reduce their journeys and therefore cut energy consumption and CO<sub>2</sub>eq. emissions. Following an upgrade in 2021, the system can now track mileage data and fuel/energy consumption.

In parallel, as part of our "green driving" program launched seven years ago, we're continuing to provide eco-driving lessons to all of our employees who use a vehicle for their job.



**150 new  
electric  
vehicles  
in France  
in 2022**

⊕ In France, our teams have use of a fleet of 150 new fully electric Renault Zoe cars that are specially designed for short-distance journeys, which is what the majority of our technical interventions involve.

**A virtuous supply chain**

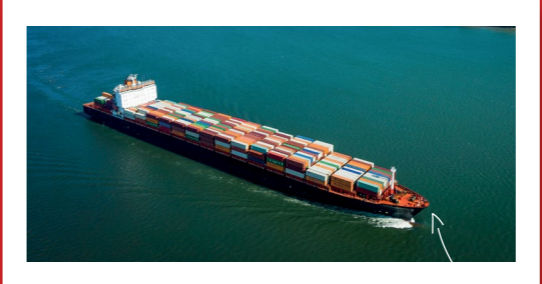
Our teams design in-house all of our Internet boxes for the French and Italian markets and then oversee their production from A to Z. Each step in our supply chain has been thought out to minimize our carbon emissions, and we are pursuing our efforts to make continuous improvements in this area.



Watch  
the video

**A commitment to eliminating air freight**

⊕ Our boxes and electronic components and cards are transported by ship from Asia to France. As a Group we've decided to eliminate air freight from our supply chain, except when absolutely necessary, such as in 2020/2021 when we had to use it to a limited extent because of the Covid-19 pandemic. This decision is a real commitment for us because alternative freight solutions are often more expensive and take longer. But we've built up strong expertise in this area and now have the capability to optimize our loads shipped from Asia.

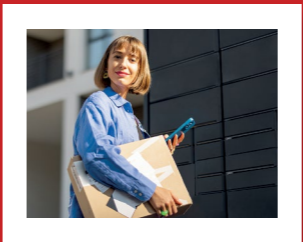


**Priority given to river  
and rail transportation**

⊕ Containers arrive at the port of Le Havre in northern France and are transported to our warehouses either along the river Seine or by goods trains. Once again, this is a deliberate choice we've made, namely to reduce road freight and the carbon emissions it generates. A barge can carry as much freight as 120 trucks and a train as much as 50 trucks.

**Optimized loads for road transportation**

⊕ When we absolutely need to use road transportation, trucks and pallets are loaded to full capacity so as to optimize each journey. We also make sure we use packaging suppliers located as close as possible to Free's warehouses and production sites in order to minimize truck mileage. These measures help us save thousands of miles a year.



**Last mile delivery**

⊕ For the last mile delivery of Freeboxes to subscribers in France, our preferred suppliers are transport companies that use mainly low-carbon vehicles, and we encourage the most carbon-saving delivery solutions, such as pick-up points in urban areas.

# Raising our employees' awareness

With more than 16,700 employees in Europe, the iliad Group has a major role to play in raising awareness among its people. Climate and environment issues are now a key focus of our in-house communication and the events we organize within our subsidiaries and the Group as a whole.

900 employees mobilized for the 2022 European Sustainable Development Week in France

In 2022, our entities in France, Poland and Italy organized a whole host of events to raise awareness about sustainability and encourage their teams to take action for the environment. These included DIY workshops on reuse and recycling, Climate Fresk workshops, communication campaigns, and much more.

In France, we used the European Sustainable Development Week, which takes place in late September, as an opportunity for raising awareness and communicating about the headway we've made under our Climate Strategy.

Since 2021, our employees have been invited to take part in climate awareness sessions with a view to getting everyone involved in the Group's pledges and action. From now on we'll be organizing these sessions every year. A highlight of the Week was an in-house conference where managers and their teams talked about the initiatives taken to reduce carbon emissions within our different businesses.



Flashback to the 2022 European Sustainable Development Week in France

Between September 18 and October 8, all of the Group's employees in France were invited to attend Climate Fresk workshops. Lasting three hours, these fun, collaborative workshops provide more insight into the complexity of global warming, based on established scientific data. Twelve workshops were held in Paris, Marseille and Bordeaux. And on October 6, an in-house conference took place to give an update on progress with our climate pledges. Some 700 Group employees watched the conference either live or on catch up.



In July, iliad Italia reached the milestone of 9 million Mobile subscribers, and to thank all of them for their trust in us a message was displayed on a giant advertising board on Via Melchiorre Gioia in Milan. The PVC used to make the board was then reused to make pouches that were given to iliad Italia's staff at Christmas and then to new hires until there were no more left. We explained what we'd done with the PVC via a QR code in order to raise employee awareness about the importance of recycling and reusing materials.



In France, the Free Proxi subscriber support service is growing. Comprising ten or so advisors, the service's teams are located regionally, close to subscribers, in small, friendly work spaces. These spaces are managed independently by each team. In order to ensure that our climate pledges are effectively deployed throughout Free Proxi, towards the end of 2022 we set up a specific system with a network of CSR ambassadors – one for each Free Proxi team. In 2023 all of these ambassadors will take part in Climate Fresk workshops and they'll be responsible for jointly drawing up the Free Proxi CSR Charter, which will contain a set of measures and actions to be taken by Free Proxi's teams on a daily basis to reduce their energy consumption, manage waste more effectively, and adopt responsible digital practices.



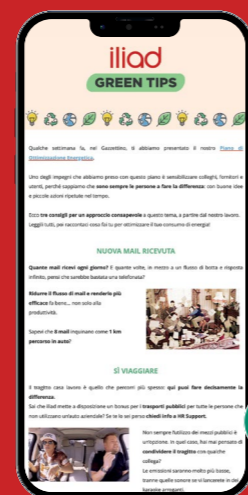
To mark Earth Day on April 22, 2022, around forty employees from Play came together to plant a hectare of woodland – made up of more than 4,000 trees – in partnership with the OEM, MP Tech, and State Forests, the Polish government's forestry management organization.

## 04 For the environment

✚ In 2022, Play's teams launched a second-hand clothes project, with employees invited to bring in the clothes they no longer wear to swap them for other clothing. Three of these events were held during the year, and more will take place in 2023.



✚ Every year, our contact centers in France and Morocco hold a "Freeday", when their staff get together and spend a day of fun and team-building. In 2022, DIY workshops were offered during the event, focused on recycling and making things yourself, with the participants learning how to make ecological and money-saving cosmetics and cleaning products.



✚ Following the publication of the Group's energy saving plan in Italy, our Italian teams launched "iliad Green Tips" – an in-house campaign explaining the importance of making small changes in daily habits to make a big impact on the environment. The campaign was carried out over three stages, with green tips on how to make a difference in the office, at home and at Christmas. And staff were invited to share their own tips.

# free

Our Group is fully mobilized for sustainability and we're already seeing results. We're taking action to reduce waste, especially e-waste, by recovering, repairing, reusing and recycling: we're recovering and repairing everything we can, reusing things where they're useful, and recycling as much as possible by using the right materials in our production. Let's keep up the good work!

**Kalidou**  
Production Method  
Coordinator  
Free

A woman with dark hair and glasses, wearing a black t-shirt with the 'free PRO' logo, is smiling and talking on a headset. She is sitting at a desk with a laptop and some sticky notes. The background is a bright office environment.

Sarah  
Sales advisor  
Free Pro

## 05 For society

From our very beginnings we've always defended consumer rights, whether it's setting fair prices for telecom bills or protecting personal data. This approach naturally led us to take up pro-active social outreach programs, which we've carried out in France since 2006 through the Free Foundation.



Watch the video

#### No price increases: a promise by our Chairman

On January 10, 2022, in a video parody filmed to mark the tenth anniversary of Free Mobile, Xavier Niel renewed the Group's promise not to touch the price of our €2 and €19.99 mobile plans for five years. Our "ça bouge pas" ("it's staying where it is") campaign reminded subscribers in France of Free's commitment to defending their purchasing power against rampant inflation.



#### Full steam ahead with the #Rivoluzioneiliad!

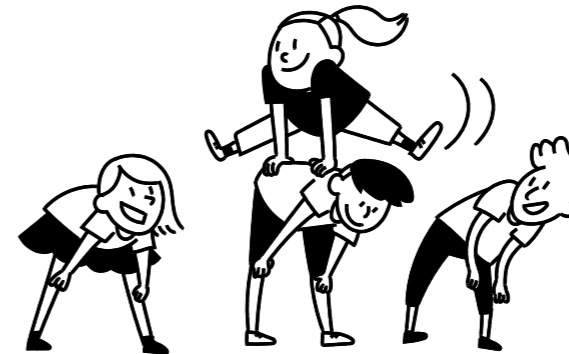
In Italy, since iliad's launch in the Mobile market in 2018, the brand has stood in a class of its own thanks to its straightforward, generous and transparent offers. iliad is the only Italian operator to offer the same deals across all sales channels, with no hidden costs, no nasty surprises and no unilateral changes to contract terms.



#### Play focuses on freedom of choice

With the acquisition of UPC Polska, Play aims to become the leader in Fixed-Mobile convergence in Poland. Following the same route as the iliad Group, with its new Fiber plans offering speeds of up to 5 Gbps and new generation TV, Play is setting a new standard in the Polish market, combining best-in-class service with freedom of choice.

## 05 For society



### Bringing digital technologies within everyone's reach

From its very beginnings, the iliad Group has been driven by the overriding aim 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.

#### Fairly priced, generous and transparent deals

The iliad Group's unique sales policy, based on transparent, generous and fairly priced deals, sets it in a class of its own.

In France, Free has consistently championed the principle of offering phone plans at the fairest possible price. Free Mobile's entry-level plan at €2 per month is an illustration of this policy. By charging subscribers the fairest possible price for its services, Free Mobile has halved the cost of mobile plans. When a price is fair, it doesn't change – and the price of the Free Mobile plans launched in 2012 has stayed the same for ten years (€2 and €19.99). And in early 2022, our teams in France renewed their promise not to touch the price of those deals for another five years, i.e. until 2027.

The launch of Free Mobile led to immediate purchasing power gains for people in France. The French statistics institute, INSEE, estimates that the cost of France's mobile plans fell by around 9.5% over the first nine months of 2012<sup>1</sup>. And over the past ten years, the average monthly mobile bill for users in France has been reduced from €27.3 in 2012 to €14.30 in 2022<sup>2</sup>. All told, Free's fair pricing policy has shaped the market,

as ten years on, France has the lowest mobile telecoms tariffs in Europe<sup>3</sup>.

Free is also constantly enhancing its Fixed and Mobile packages, without raising their prices. And in the Mobile segment, its unlimited call and text deal even set a new standard for the market. Since 2012, the data allowance included in the Free Mobile Plan has also been regularly increased without any change in price and 4G then 5G capabilities included at no extra cost. Reflecting our unwavering commitment to transparency, Free's offers do not contain any hidden costs, and our sales contracts are straightforward and easy to understand for everyone.

In Italy, the iliad brand was launched by the Group in 2018 with the same ambition of bringing transparency, quality, innovation and generosity to the Italian telecoms market through the #Rivoluzioneiliad. iliad Italia stands out for its commitment to transparency – it is the only operator to offer the same deals across all sales channels, with no hidden costs, no nasty surprises and no unilateral changes to contract terms.

In Poland, with the completion in 2022 of its acquisition of the fixed-line operator UPC, the iliad Group is seeking to become the leader in the Polish Fixed-Mobile convergence market. Following the same route as the Group, our Polish subsidiary now offers cutting-edge Fiber plans, with a new generation TV service, combined with a freedom of choice that is unique in the Polish market.

<sup>1</sup> Source: INSEE.

<sup>2</sup> Source: ARCEP, Observatoire des Marchés des Télécommunications Electroniques, May 26, 2021.

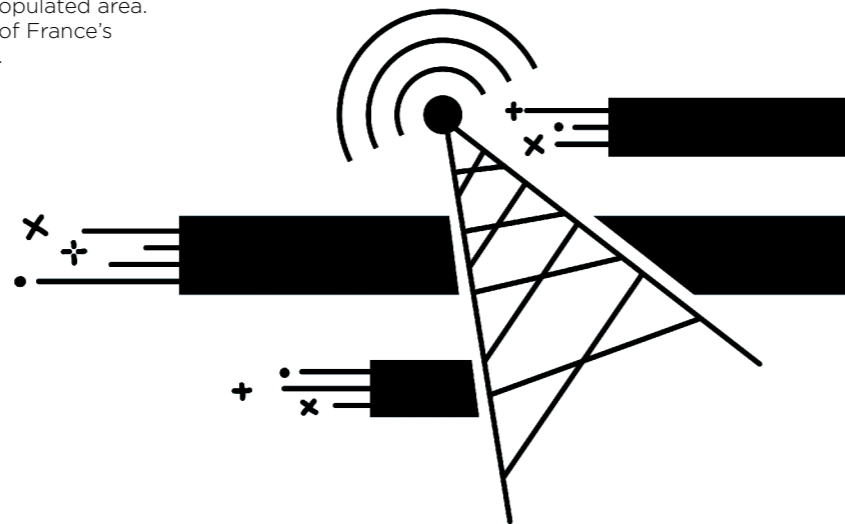
<sup>3</sup> Source: Rewheel Research Pro study, November 2021.

## ► Providing region-wide coverage

In each of the countries in which we operate, we have always sought to give everyone, everywhere, equal access to the same offerings. Whether our subscribers live in a city or a rural village, they will always pay the same price. This vision led us to invest heavily, right from the outset, in rolling out our own equipment and infrastructure. In doing so, we're helping to bridge the digital divide, boost local economies, and build national cohesion in all of our three geographies.

In France, since 2006 we've devoted over €10 billion to rolling out fiber across the country, including in the most sparsely populated areas. Our aim is to be a long-term partner for local authorities and invest alongside them in the fiber rollouts of regional-level networks, known as "public initiative networks". At end-2022, 22,000 municipalities were covered by Free Fiber in France.

Free also took the gamble of building its own mobile network as from 2011, i.e. 15 years after France's other operators. To make up for this lost time, we had to go at an unprecedented pace, and we're currently deploying 2,000 new base stations a year on average. Our mobile rollout drive covers all regions, even the most rural. Over the last few years, almost one in two of our base stations has been deployed in a non-densely populated area. At end-2022, Free covered 99.2% of France's population for 4G and 88% for 5G.



\* Fiber to the Home.

In Italy, our mobile network coverage is growing every day, and at end-2022 iliad Italia covered over 99% of Italy's population for 4G and more than 3,000 Italian towns for 5G. We are partnering the country's digital and technological transition thanks to our investments in rolling out our Mobile network and purchasing 3G, 4G and 5G frequencies. So far, the Group has already invested more than €3.8 billion in Italy, and at end-2022 iliad Italia had over 9,500 base stations.

In Poland, Play is the leader in the Mobile market with 10,600 base stations at end-2022. Following the Group's acquisition of UPC Polska and the creation of the partnership with InfraVia Capital Partners to set up a dedicated FiberCo, the Group is now investing massively to switch the fixed-line network of 3.7 million Polish households to fiber, and therefore ultimately provide FTTH\* coverage to more than 6 million households in Poland.

## Promoting local employment and dialog with regional authorities

Not only is the iliad Group a fast-growing technology player on a European scale, it is also a local player based in close proximity to its subscribers and with strong regional ties in all of the countries in which it operates. Our regional commitment and engagement is reflected in the long-term employment we create throughout France, Italy and Poland, as well as in the daily relations of trust we have with all local players.

**700**  
Free Proxi  
employees  
throughout  
France  
at end-2022.

## ► Long-term regional employment

In France, the iliad Group employed over 11,600 people nationwide at end-2022. Other than Paris, where the Group's head office is located, we have two major catchment areas. First, the conurbation of Marseille, where we have created more than 1,100 jobs during the past ten years, thanks to one of our main subscriber relations centers being based there as well as our Free Pro teams. And second, the Nouvelle-Aquitaine region where we currently have over 1,000 employees, around half of whom work in Subscriber Relations at our Bordeaux center.

Our proximity strategy is also clearly illustrated in our directly-owned store network that covers the country (with some 190 stores at end-2022), and which generates long-term jobs. In addition, towards the end of 2022 we announced a highly innovative initiative – the Free Proxi service, designed to further strengthen our regional presence by setting up small teams dedicated to subscriber support across the whole of France.

In Italy, iliad has two sites in Milan and Rome and 11 sites spread throughout the rest of the country. In 2022, the operator recruited 178 people, 75 of whom under 30 years old. Outside Milan, where its head office is based, iliad Italia's number of hires increased by 64% between 2021 and 2022. A study carried out by Luiss University\* in November 2022 reveals that since 2018 our Italian subsidiary has helped to create, directly and indirectly, almost 83,000 jobs across all sectors.

And lastly, in Poland, at end-2022 Play had over 4,200 employees across 184 sites nationwide. More than 2,500 jobs, i.e. 60% of the workforce, are located outside Warsaw (where Play's head office is), mostly in Katowice, Krakow, Poznan and Gdansk.

\* Il contributo di iliad all'economia italiana. Analisi degli impatti socioeconomici degli investimenti e degli impatti concorrenziali nel mercato della telefonia mobile – Luiss, November 2022.



## Free Proxi: permanent jobs throughout France

► Towards the end of 2022, the Group launched a subscriber support revolution with Free Proxi, a state-of-the-art concept for subscriber support. Throughout France, small local teams made up of 8 to 10 Free advisors are on hand for subscribers in their neighborhoods to answer all their questions. Thanks to their local presence, the Free Proxi teams have detailed knowledge of their region's fixed and mobile network infrastructure. They can easily troubleshoot potential incidents, and even go directly to a subscriber's home to restore service or replace a device. At end-2022, 700 employees already formed part of this system, located across 67 Free Proxis throughout France. Free is currently actively hiring people on permanent contracts to help it continue to roll out the Free Proxi service.

## Ongoing, constructive dialog with local authorities

In France, Free's region-wide commitment and engagement is reflected in the close relations our people have built 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. The 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 2022, Free took part in around a hundred public meetings. Also, throughout the year Free's regional players deal with questions from residents about various issues (such as shutting down the copper network, the health impact of radio waves and after-sales matters), providing prompt answers that take into account 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. All of this enables our teams to forge long-term relations with local decision-makers to support them in the digital transition of their regions and at the same time regularly take part in meetings with local communities.

In Italy, Iliad has been working since 2018 hand in hand with local authorities to plan the rollout of its mobile network, with our Italian teams holding over 90 meetings in 2022 with local and regional

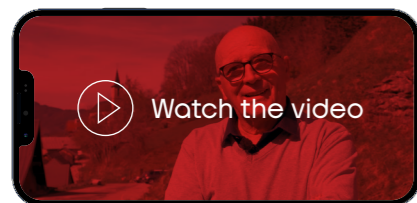
**330**  
meetings with local  
authorities in France, Italy  
and Poland in 2022

government agencies. In particular they worked closely with the municipal agencies of Pisa, Rimini and Civitanova Marche, which helped to positively change local players' perceptions of the mobile network rollout.



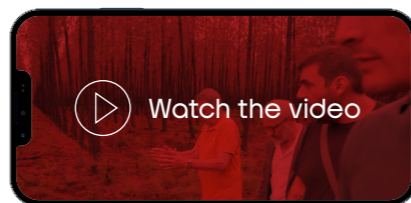
+ In Poland, Play took part in 147 consultation meetings throughout the country during 2022.

## Partnering local councilors to meet the specific needs of their communities



**Helping to bridge the digital divide**

+ Free is involved in France's national program for eradicating the country's mobile signal blackspots as well as in all targeted mobile coverage programs set up in partnership with local and regional authorities. For example, during 2022 our teams brought into service a 3G/4G site in the village of Montsapey in the Savoie region.



**Coping with extreme weather events**

+ Local councilors are increasingly asking for help with making their regions more resilient to extreme weather events. Following the wildfires that ravaged the Gironde area in south-west France during the summer of 2022, a mobile mast was damaged which meant that the residents of Louchats no longer had network coverage. Free's technicians came out very quickly though to fix it.

## Creating a trustworthy digital environment

Whether it's protecting our information systems, the personal data we collect, vulnerable populations who use our services, or the health of the people to whom we provide mobile coverage, within the Iliad Group we strive every day to do things right.

**8,000**  
employees  
in France trained  
in cybersecurity  
issues since 2020

### Cybersecurity: protecting our information systems – an absolute priority

Faced with the mounting number of cyberattacks, the Group has increased its measures for protecting its information systems in its three geographies. Ensuring uninterrupted network coverage and continuity of our services, combined with protecting the security and confidentiality of the personal data of our subscribers and our employees, are two absolute priorities for us. This major concern has resulted in important choices that we have made in our Fixed and Mobile telephony and ISP operations, as well as for our subscriber relations platforms, our data centers and our human resources systems.

Our cybersecurity policy is based, among other things, on selecting trusted technical partners and only permitting in-house access to critical equipment as well as encrypting the various accesses (wireless encryption, remote VPN access).

The Group also regularly analyses the cyber risks to which it is exposed. An assessment of those risks and a description of all the measures put in place to mitigate them are compiled in documentation drawn up as part of our information system security policy (ISSP). To make sure that employees fully understand these issues, the Group has set up specific training plans in France, Italy and Poland and provides them with appropriate support systems. In 2022, 1,700 employees in France completed e-learning on cybersecurity, which means that since 2020 more than 8,000 employees in the Group's French subsidiaries have been given cybersecurity training. In Italy, all Iliad employees followed compulsory training on cybersecurity in 2022. And in Poland, a cybersecurity training module is included in the induction program for all new hires when they join the company.



### The Group's strategic choices

- ▶ Wireless connections are always encrypted using the latest algorithms.
- ▶ Oversight and operation of equipment is carried out in-house with secure, authentication-based access control.
- ▶ Subscriber relations platforms are managed internally at Group level by dedicated structures to ensure that personal data is not relayed to external parties.
- ▶ The Group prefers to develop its information systems in-house.
- ▶ Access to databases containing subscribers' personal data systematically requires authentication, with hierarchical access levels.
- ▶ All actions on information systems and equipment are traced.
- ▶ The policy for creating and storing passwords for accessing subscriber areas is regularly updated in line with security requirements.
- ▶ Website encryption protocols adhere to the best recommendations.
- ▶ Our data center hosting services are ISO 27001 and HDS\* certified.

\* Health data hosting certification in France.

## ► Personal data protection

In an increasingly connected world, our subscribers are entitled to expect their personal data to be kept in safe hands. The confidentiality and security of personal data is of paramount importance to our Group and we work hard to maintain a transparent and secure environment built on trust by:

- implementing the necessary measures to ensure that each item of personal data is processed in compliance with regulatory requirements, in particular Regulation (EU) 2016/679 of the European Parliament and of the Council dated April 27, 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (GDPR\*);
- maintaining a legally compliant base for the collection, processing and/or storage of personal data;
- relaying fully transparent information to our subscribers about the processing of their personal data;
- providing subscribers with a smooth and efficient process for exercising their right to check their personal data.

To ensure that this policy is properly applied across all our entities and geographies, we have set up a specific data protection governance structure coordinated by the Iliad Group Data Protection Officer comprising data protection officers (DPOs) tasked with obtaining assurance that the Group complies with all relevant laws, regulations and internal standards and, where necessary, recommending improvements

to the Group's systems. Networks of GDPR correspondents have also been set up, with responsibility for implementing the Group-wide GDPR compliance program.

So that all our employees fully understand the importance of protecting personal data, we have put in place a specific training plan on this topic and provide appropriate tools to support them. We also include modules on data security and confidentiality in our employee training and awareness-raising plans.

### ⊕ The Group has set up a specific governance structure, with three Data Protection Officers (DPOs).

From top to bottom:  
Serge Ferreira,  
DPO France  
and Group;  
Guido Galletti,  
DPO Italy;  
Jarosław Majczyk,  
DPO Poland.



### Responsible digital technology: protecting vulnerable people

- ⊕ The Iliad Group endeavors to protect all people who use its services, and particularly minors.

In France, the parental control system can be activated at no cost to subscribers for any of Free's Fixed and Mobile offerings. The parental control option enables parents to monitor content that their children watch online on the web or on their phone, by blocking inappropriate content and managing their screen time, even when the parents aren't there.

In Italy, Iliad signed the Pietrarsa Manifesto which coincided with the 25th anniversary events marking the creation of the Italian Data Protection Authority. The signatories particularly undertook to put in place tangible measures to make the processing of the data they collect transparent and understandable, and offer training to minors and the elderly on making them aware about the importance of their personal data.

\* General Data Protection Regulation.

## ► Electromagnetic waves: a policy based on dialog and transparency

In France, Italy and Poland, the Group implements a pro-active policy on radio waves that goes further than simply complying with current regulations, by promoting dialog and transparency.

- ⊕ In France, ever since it entered the mobile telephony market in 2012, Free has rolled out its network in constant compliance with all applicable health and environmental regulations. As well as strictly applying recommendations in this area, our teams provide our various stakeholders with transparent information backed up by scientifically proven facts. Constructive partnerships have been forged with local authorities, and seminars are held on a regular basis to share scientific knowledge and feedback from the field. Free also takes part in local government meetings in France organized prior to the installation of new transmitters, as well as in forums organized by local authorities, government bodies and health agencies to inform the public and respond to their concerns.



- ⊕ In Italy, Iliad ensures that emissions from its base stations remain well within the legal limits by implementing strict controls across its entire network. Before building a new base station, Iliad assists the regulatory authorities in measuring the environmental impact of the site's electromagnetic field and performing all necessary checks. Iliad Italia also cooperates with the regional environmental protection agencies (ARPA) and undertakes to reduce the emission power of its base stations where necessary. Transparency is a fundamental value for Iliad. In addition to raising awareness and educating employees about the potential risks associated with exposure to electromagnetic waves, our radio engineering teams regularly submit detailed reports on mobile network emissions to the relevant authorities, including the Ministry of Enterprise and Made in Italy (MIMIT), the National Environmental Protection System (SNPA) and the Higher Institute for Environmental Protection and Research (ISPRA).



- ⊕ In Poland, regulations concerning electromagnetic fields are governed by the Environmental Protection Act of April 27, 2001. The Environment Ministry Regulation dated October 30, 2003 sets maximum emission levels for base stations and specifies the emission control procedures to be implemented by operators. In addition, since January 1, 2020, electromagnetic radiation limits have been aligned with the recommendations issued by the European Union, the World Health Organization and the International Commission on Non-Ionizing Radiation Protection (ICNIRP). As well as strictly complying with these regulations, Play's radio engineering teams take an active part in meetings organized by the Minister for the Digital Economy with the aim of regularly updating legislation designed to protect people from any adverse effects of electromagnetic waves.



# Ensuring a responsible procurement policy

Respecting the underlying principles of CSR is an essential component of our Group procurement policy and we place as much importance on this as quality and prices. We therefore pay particular attention to our partners' CSR performance across our entire supply chain.

380 suppliers assessed by EcoVadis in France and Italy

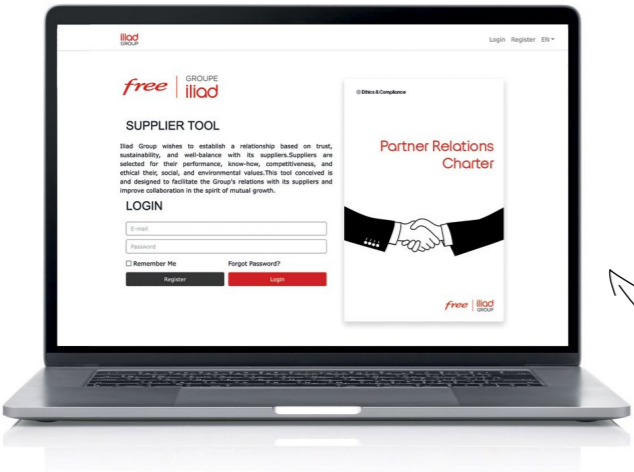
Already back in 2018 the iliad Group put in place a procurement policy based on assessing the CSR performance of all of its partners. We expect them to be standard-setters in three main areas: business ethics, environmental protection, and respect for labor rights and human rights.

To this end the Group has entered into a partnership with EcoVadis, a platform that is used by more than 50,000 companies in 150 countries which we selected on account of its ISO 26000-based assessment methodology and the tangible results it has delivered.

At end-2022, 380 of our suppliers in France and Italy had been assessed by EcoVadis, and in 2023 we plan to extend the assessment process to Poland.

The Group also published a Partner Relations Charter in 2022, the objectives of which are to:

- ▶ strengthen CSR practices with our partners;
- ▶ enhance the Group's social and environmental performance by selecting virtuous and committed partners; and
- ▶ help manage risks by assessing the externalities of products and services offered.



## An internal platform dedicated to managing suppliers

⊕ In 2020, the Group developed an internal tool for managing its suppliers and monitoring their compliance. Through this tool we can optimize our relations with our stakeholders and more easily track their CSR performance.



## Publication of the Group's Partner Relations Charter

⊕ In 2022, the Group published a Partner Relations Charter setting out the principles and commitments it has set for itself, and to which its suppliers must also adhere.

# Setting the standard in our business conduct

Ever since it was founded, the iliad Group has held and upheld the values of transparency, trust and respect. These values translate into strong ethical principles that underpin all of our business activities and allow us to promote a culture of leading by example to encourage behaviors and business ethics that meet the highest standards of integrity.

2,250 employees followed Anti-corruption – Sapin II training in 2022

During 2021, the Group decided to overhaul its anti-corruption compliance system. This entailed updating our Code of Ethics, which sets out the Group's values and business ethics, and drawing up an Anti-Corruption Code of Conduct which provides a clear framework for each of our employees to adopt the right behaviors and attitudes when faced with risks of corruption.

Additionally, to ensure it offers a safe and pleasant place to work for all of its employees and partners, the iliad Group has set up an online whistle-blowing system. This system is straightforward and efficient, and enables the Group's employees, external partners and temporary workers to inform the Group if they identify any behavior or situation

that could potentially be in breach of the Code of Ethics or the Anti-Corruption Code of Conduct. Whistle-blowers can use this system in the strictest confidentiality and in totally secure conditions.

An awareness-raising and training plan has also been developed on preventing risks related to ethics and compliance. Its main objective is to relay a culture of compliance within the Group and to reiterate the principles set out in the Code of Ethics. This training is available in France, Poland and Italy in order to cover all country-based regulatory specificities.

2,250 Group employees followed Anti-corruption – Sapin II training in 2022.



## A new Group system for Anti-Corruption compliance

⊕ In 2021, the iliad Group overhauled its anti-corruption compliance system, by updating its Code of Ethics and drawing up a new Anti-Corruption Code of Conduct applicable in all three of our geographies. We also launched a new totally confidential and secure whistle-blowing platform, through which alerts can be raised about any behaviors or situations that could potentially be in breach of established rules and principles. And each country has drawn up a specific Gifts & Invitations policy, in accordance with the requirements of the Sapin II Act.

## Acting in support and solidarity

Since our very beginnings a sense of support and solidarity has run throughout our Group. We are always there in times of crisis – as we were in 2020 during the outbreak of Covid, and once again in 2022 in support of Ukraine. Every day, in each of our geographies, we support numerous non-profit organizations, either directly or through the intermediary of our Free Foundation in France.

### ► Rallying in strong support for the people of Ukraine

Right from the start of the war in Ukraine, the Iliad Group has been at the sides of the Ukrainian people, providing help and support. Play's solidarity efforts in Poland have been exemplary. The operator moved into action very fast to help its Ukrainian neighbor, providing free-of-charge calls and text messages to all Ukrainian mobile networks as from the very first day of the war, and very quickly making these unlimited. Prepaid SIM cards were provided at no cost to Ukrainian refugees, and many Play and UPC Polska employees volunteered to go and activate them at border points and in stations.

Meanwhile, our Polish network teams worked day and night to augment Play's network capacity and absorb the rapid rise in data traffic, activating twelve additional base stations in record time to cover the increase in needs.

The Group also moved into very quick action in France and Italy. From the very first days of the war, Free and Iliad reworked their commercial offerings to make all communications to Ukraine free of charge.

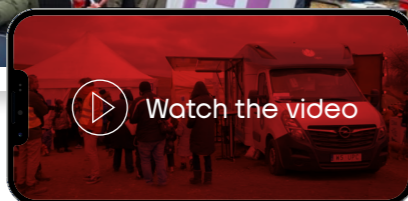
And on March 29, 2022, Free set up a mobile plan free of charge and with no commitment – the Ukraine Solidarity Mobile Plan – including unlimited calls to Ukraine and 10 GB of data. In all, some 50,000 of these plans were distributed.

**1 million**  
prepaid plans  
distributed  
to Ukrainian  
refugees  
in Poland



**Play and UPC Polska work together in solidarity for Ukraine**

➤ Even before the Group's acquisition of UPC Polska was officially completed, the teams from Play and UPC decided to work together to help Ukrainian refugees. Right from the outbreak of the war, Play gave out prepaid SIM cards free of charge to the refugees. 40 kiosks were opened as an emergency measure along border points and in stations in order to activate the cards, with over 200 of our employees volunteering to go there.



➤ In France some 50,000 Ukraine Solidarity Mobile Plans were handed out, i.e. to almost one out of two Ukrainian refugees.



“

Together with volunteers from Play and UPC, we were on the Polish-Ukrainian border, where refugees from Ukraine arrived fleeing from the war. We helped them keep warm, charge their phones and provided them with SIM cards to keep them in touch with their families and loved ones. We supported them with conversation and helped them organize the necessary things for further travel, such as clothes, cleaning products and equipment for children. We wanted to make them feel at home with us.

**Julia Gnyp**  
Real Estate Expert  
and volunteer  
Play



370  
projects  
supported  
since 2006

📌 Bridging the digital divide  
with the Free Foundation

Created in 2006, Free's corporate Foundation takes action to help bridge the digital divide and promote open-source software.

The Foundation regularly launches calls for projects covering current social issues for which digital tools can be used as a vehicle for action. Every year, around twenty non-profits located across France receive funding from the Free Foundation.

Since its creation the Foundation has provided support for more than 370 projects. It also forges lasting partnerships with non-profits working on digital inclusion programs for young people, such as Sport dans la Ville, Les Entreprises pour la Cité, Espace Numérique Sud Charente and EcoMobil.

Right from its outset, and in phase with the Group's DNA, the Foundation has also supported the open-source software community, with 36 open-source non-profits currently able to access the servers made available by the Foundation.

Additionally, the Foundation encourages Free's employees to get involved in charity and volunteer work via various in-house programs, such as a salary-rounding system and a skills volunteering platform, and it supports charities of which employees themselves are members.



➤ In 2022, the Foundation organized coaching sessions for the non-profits it supports as part of its skills volunteering program. Through this program, several Free employees coached students from Ecoles de la 2<sup>e</sup> Chance (second-chance schools), in partnership with Les Entreprises pour la Cité.



Call for projects

"Creating connections and culture  
- let's do it together!"

Cultural outreach initiatives building  
community links in disadvantaged areas

Seven winning projects awarded funding in 2022

In 2022, the Free Foundation launched a nationwide call for projects based on a theme called "Creating connections and culture - let's do it together!" This call was aimed at supporting projects that use digital tools to create spaces where the residents of disadvantaged areas can come together to take part in cultural and artistic initiatives, and resulted in seven winning projects representing total funding of €78,500. Among the winners were Lecture Jeunesse, for its Numook project - an innovative program designed to build up teenagers' reading and writing skills and self-confidence using digital technology - and Horizome, for its "Pépinère" creative space in the Haute-pierre district of Strasbourg, which is dedicated to encouraging artistic creation, social innovation and digital inclusion. Some €10,000 in funding was provided per project.



Find out  
more at  
the Free  
Foundation



Il Cielo Itinerante  
in Italy

➤ In Italy, Iliad is helping to combat inequality in accessing education by supporting project organized by the non-profit "Il Cielo Itinerante", whose mission is to promote STEM subjects (science technology, engineering and mathematics) among young people - both girls and boys- from disadvantaged educational backgrounds. In 2022, Il Cielo Itinerante and Iliad traveled Italy from north to south, with 18 stops in six towns, holding over 100 workshops and raising awareness among 500 children.

The Annual Great  
Orchestra of Christmas  
Charity (WOŚP) in Poland

➤ For many years now, Play has partnered with the Great Orchestra of Christmas Charity [Wielka Orkiestra Świątecznej Pomocy - WOŚP], one of the biggest non-profit organizations in Poland which raises money for the health sector, particularly for pediatric care. Every year, employees from Play volunteer to take part in the Grand Finale when donations are sent in by text message throughout Poland.



Sidaction  
in France

➤ Each year, Free takes part in Sidaction, an Aids fundraising campaign, by hosting the charity's volunteer workers and mobilizing Free's people to help organize the event and make sure everything goes smoothly. For the 2022 Sidaction, from midday until 2 a.m. the next day, some one hundred volunteers took over the workstations of our Subscriber Relations Center in Paris to answer calls from kind donors.

# A look at 2023 so far

A look at 2023 so far

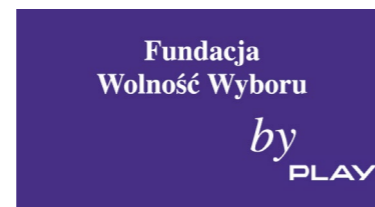
In 2023 the iliad Group reaffirmed its CSR commitments, with more major initiatives taken for employees, the environment and society at large.

## January



### Annual Great Orchestra of Christmas Charity fundraising event

In 2023, Play once again partnered with the Great Orchestra of Christmas Charity [Wielka Orkiestra Świątecznej Pomocy - WOŚP], one of the biggest non-profit organizations in Poland which raises money for the health sector, particularly for pediatric care. More than 200 Play employees volunteered to take part in this year's fundraising event, which received a record amount of donations sent in by text via the Play24 app.



### Creation of the "Freedom of Choice" foundation

In January, Play announced the creation of a corporate foundation called "Freedom of Choice" ("Wolność Wyboru"), whose role is to support digital education projects. It is also the founding partner of 42 Warsaw, the first 42 coding school campus in Poland.



**"ILIAD 'S'ILLUMINA DI MENO':  
SWITCH OFF NOTTURNO  
DELLE FREQUENZE E DELLE VETRINE  
PER PRENDERE PARTE AL CAMBIAMENTO**

## February

### Taking part in the National Energy Saving Day

On February 16, Iliad Italia took part in "M'illumino di meno", Italy's national energy saving day, when everyone is encouraged to make a small change in their daily habits to reduce their energy consumption. In line with the Group's Energy Saving Plan published in 2022, Iliad Italia reaffirmed its commitment to switching off the lighting in its stores when they're closed, and switching off certain frequency bands on its mobile antenna at night.

## March



### Launch of a mobile phone trade-in program

On March 1, Free announced the launch of a program for trading in mobile phones, in partnership with Recommerce, its long-standing partner specialized in high-quality phone refurbishment in Europe. Through this program, in just a few simple steps, anyone can get an estimate for their old phone and then trade it in for up to €600. The used phones that are sent in are collected in a sorting center to be refurbished and then either re-sold or recycled.

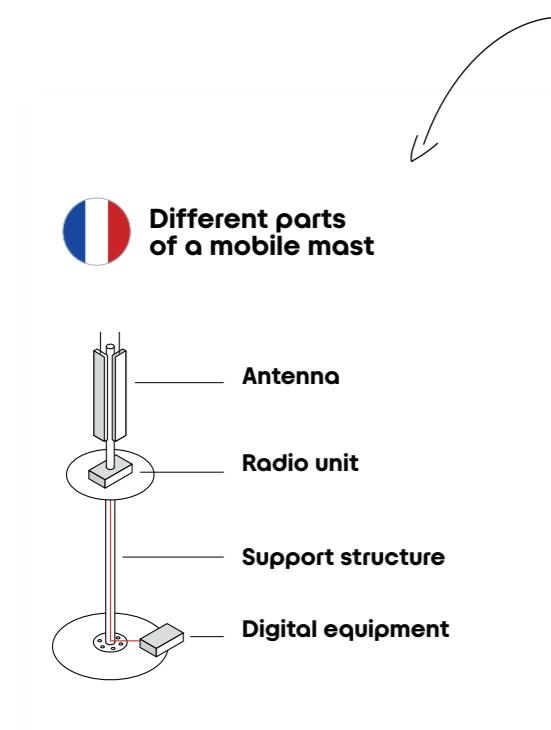
### Launch of the "We're changing for you" project

Play has unveiled an innovative project designed to transform its 11 main stores into spaces dedicated to customer service. The aim is to more effectively meet the needs and expectations of all Play's customers, whatever their age. Workshops have been set up for seniors to explain how to use a smartphone, a laptop and e-health services. The project also includes work on rethinking the design of Play's stores to adapt them more to seniors and enhance their in-store experience. And an educational web site containing resources dedicated to seniors has been put online.



### Launch of the Workplace Equality Month

On March 8, to mark International Women's Day, the Group launched its first "Workplace Equality Month" in France. Throughout the month, the Group organized numerous events and other actions for its teams to promote ever more diversity and inclusion. Also, on March 14, it launched "iliad'elles" - a network for all of the Group's women managers designed to promote the value of women leadership and empowerment within Iliad and inspire their female colleagues to take up similar leadership roles.



### March

#### Launch of a program to recondition mobile antennas

On March 30, Free announced the launch of the Vérification Bon Fonctionnement (VBF) program in France for reconditioning mobile mast antennas. On average, a mobile mast comprises three antennas, some of which are replaced regularly to increase their capacity in phase with upgrades to the related technology. Up until the launch of the VBF program, obsolete antennas were taken down and recycled. However, since the VBF program has been put in place, when a Free Mobile antenna is dismantled it is sent to our partner, Amphenol Antenna Solutions, to be checked, upgraded and, if necessary, repaired, before being reconditioned and mounted on new mobile masts. Thanks to the program's success in delaying obsolescence, the antennas remain in service for two to three times longer.

### June

#### Launch of our in-house network of Climate Ambassadors

On June 5, to mark World Environment Day, the Group organized the first meet-up of its new network of Climate Ambassadors. Within our various entities, our ambassadors have moved into action to make our Climate pledges part of the Group's daily life and roll them out across all of our businesses and operations.



### May



#### Third edition of iliad Colleges

The third edition of iliad College began in May 2023. This training program is fully dedicated to the telecoms sector and is open to everyone wishing to join iliad Italia's store network as a sales advisor. Lasting a total of 30 hours, half of which is spent in store, it provides training in sales and retail, drawing on the strong expertise built up by iliad in this sector.



#### Introduction of a certified e-signature solution

In May, Play rolled out a certified e-signature solution within its sales channels. This system will enable Play's B2B teams to electronically sign sales contracts, and it will also be proposed by sales advisors to B2C subscribers. Play is Poland's first telco to offer such a system, which drastically reduces the use of paper.

#### New call for projects by the Free Foundation

On June 22, the Free Foundation launched a new call for projects based on the theme of digital as an impact accelerator, aimed at supporting regional non-profit organizations. The objective is to provide funding to projects that address societal issues such as economic inclusion and the ecological transition. As a first step, this new call for projects was aimed at non-profits based in Strasbourg and Lille, but going forward will address other municipalities.

#### Digital as an impact accelerator



#### Launch of iliadship

In June, iliad Italia unveiled "iliadship", an innovative program designed to support 10 university students each year in the field of humanities as well as sciences. iliadship is a long-term initiative to which iliad will provide over €1 million in funding over 10 years, and is fairly unique in Italy's educational landscape in that it combines university studies with business experience. The program comprises a €15,000 grant for each student, individual mentoring with an iliad employee and a member of the Advisory Board, and an internship within iliad or one of its partner companies.

June



3S obtains ISO 27001 certification

In June, our Polish subsidiary 3S – dedicated to hosting services – obtained ISO 27001 certification, the world’s best-known standard for information security management systems (ISMS). This certification provides the guarantee that our Polish data centers are managed based on a strict system that preserves the confidentiality, integrity and availability of the data that they host.



Opening of a 42 coding school in Warsaw

In June, the world’s forty-ninth 42 coding school opened in Warsaw. Play is a partner of the project via its corporate foundation, “Freedom of Choice”. Like all of the other 42 school campuses, the Warsaw site will offer an excellence IT training pathway that will be free of charge and open to everyone. The school will welcome its first cohort of students as of this September.

July

2 years of partnership with “Il Cielo Itinerante”

In early July, iliad Italia celebrated two years of partnership with the non-profit organization, “Il Cielo Itinerante”, whose mission is to combat inequality in accessing education in Science, Technology, Engineering, and Mathematics (STEM). 100 students who were helped by the organization’s projects in 2022 and 2023 came together in Naples for an action-packed day attended by Benedetto Levi, CEO of iliad Italia, and the Italian astronaut Roberto Vittori.



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