

4.8 Report by one of the Statutory Auditors

Report by one of the Statutory Auditors, appointed as independent third party, on the verification of the consolidated non-financial statement

This is a free English translation of the Statutory Auditor's report issued in French and is provided solely for the convenience of English-speaking readers. This report should be read in conjunction with, and construed in accordance with, French law and professional standards applicable in France.

For the year ended 31 December 2022

To the Annual General Meeting,

In our capacity as Statutory Auditor of your company (hereinafter the "entity") appointed as independent third party, and accredited by the French Accreditation Committee (COFRAC) under number 3-1884⁽¹⁾, we have undertaken a limited assurance engagement on the historical financial information (observed or extrapolated) in the consolidated non-financial statement, prepared in accordance with the entity's procedures (hereinafter the "Guidelines"), for the year ended December 31, 2022 (hereinafter, the "Information" and the "Statement" respectively), presented in the Group's Management Report pursuant to the legal and regulatory provisions of Articles L. 225-102-1, R. 225-105 and R. 225-105-1 of the French Commercial Code (*Code de commerce*).

At the request of the entity, we conducted works designed to express a reasonable assurance conclusion on the information selected by the entity and identified by the sign ✓✓.

Limited assurance conclusion

Based on the procedures we have performed, as described under the "Nature and scope of procedures" and the evidence we have obtained, nothing has come to our attention that cause us to believe that the consolidated non-financial statement is not prepared in accordance with the applicable regulatory provisions and that the Information, taken as a whole, is not presented fairly in accordance with the Guidelines, in all material respects.

Comments

Without modifying our conclusion and in accordance with article A. 225-3 of the French Commercial Code, we have the following comments:

- for the calculation of health and safety indicators, despite the strengthening of the Group's data collection system and tool, the annual reporting by local entities can still be improved in terms of process and tool robustness. A consolidated Group reporting at a higher frequency could be put in place;
- for the calculation of waste-related indicators, apart from "Mobiles collected from customers", we identify for the MEA zone, as well as for Belgium, an improvement in the reporting of information. However, efforts still need to be made in terms of completeness, collection monitoring and waste treatment. The MEA and Belgium scope corresponds to less than 18% of the Group's consolidated turnover and contributes to 7% of the reported waste;
- as part of the development of the performance indicators used by the Group, the process of standardizing the definitions of the indicators in the procedure's manual is underway in order to take into account future regulatory changes;
- for the calculation of indicators relating to digital inclusion, the reporting process is strengthening for the next years, with a more precise qualification of the programs eligible for support for beneficiaries and the formalization of the controls carried out on the data.

Reasonable assurance conclusion on a selection of non-financial information

Based on the procedures performed, as set out in the "Nature and scope of our work" and "Nature and scope of additional work on the information selected by the entity and identified by the sign ✓✓" sections of this report, and the evidences collected, the information selected by the entity and identified with the symbol ✓✓ in the Statement has been prepared, in all material respects, in accordance with the Guidelines.

Preparation of the non-financial performance Statement

The absence of a commonly used generally accepted reporting framework or a significant body of established practices on which to draw to evaluate and measure the Information allows for different, but acceptable, measurement techniques that can affect comparability between entities and over time.

Consequently, the Information needs to be read and understood together with the Guidelines, summarized in the Statement and available on the Entity's website or on request from its headquarters.

Inherent limitations in preparing the Information

As stated in the Statement, the Information may be subject to uncertainty inherent to the state of scientific and economic knowledge and the quality of external data used. Some information is sensitive to the choice of methodology and the assumptions or estimates used for its preparation and presented in the Statement.

Responsibility of the entity

Management of the Entity is responsible for:

- selecting or establishing suitable criteria for preparing the Information;
- preparing a Statement pursuant to legal and regulatory provisions, including a presentation of the business model, a description of the main non-financial risks, a presentation of the policies implemented considering those risks and the outcomes of said policies, including key performance indicators, and the information set out in Article 8 of Regulation (EU) 2020/852 (Green Taxonomy);
- preparing the Statement by applying the Entity's "Guidelines" as referred above; and
- designing, implementing and maintaining internal control over information relevant to the preparation of the Information that is free from material misstatement, whether due to fraud or error.

The Statement has been prepared by the Management Board.

(1) Accreditation Cofrac Inspection, number 3-1884, scope available at www.cofrac.fr

Responsibility of the Statutory Auditor, appointed as independent third party

Based on our work, our responsibility is to provide a report expressing a limited assurance conclusion on:

- the compliance of the Statement with the requirements of Article R. 225-105 of the French Commercial Code;
- the fairness of the information provided pursuant to part 3 of sections I and II of Article R. 225-105 of the French Commercial Code, i.e., the outcomes of policies, including key performance indicators, and measures relating to the main risks, hereinafter the “Information”.

As we are engaged to form an independent conclusion on the Information as prepared by management, we are not permitted to be involved in the preparation of the Information as doing so may compromise our independence.

At the request of the entity and outside of the scope of certification, we may express reasonable assurance that the information selected by the entity, presented in the appendices, and identified by the symbol ✓✓ has been prepared, in all material respects, in accordance with the Guidelines.

It is not our responsibility to report on:

- the entity’s compliance with other applicable legal and regulatory provisions (particularly with regard to the information set-out in Article 8 of Regulation (EU) 2020/852 (Green taxonomy), the French Duty of care law, and provisions against corruption and tax evasion);
- the fairness of information set-out in Article 8 of Regulation (EU) 2020/852 (GreenTaxonomy);
- the compliance of products and services with the applicable regulations.

Applicable regulatory provisions and professional guidance

We performed the work described below in accordance with Articles A. 225-1 et seq. of the French Commercial Code, the professional guidance issued by the French Institute of Statutory Auditors (*Compagnie nationale des commissaires aux comptes*) applicable to such engagement, in particular the professional guidance issued by the *Compagnie nationale des commissaires aux comptes*, “Intervention du commissaire aux comptes – Intervention de l’OTI – Déclaration de performance extra-financière”, acting as the verification program, and with the International Standard on Assurance Engagements 3000 (revised)⁽¹⁾.

Our independence and quality control

Our independence is defined by the provisions of Article L. 822-11 of the French Commercial Code and the French Code of Ethics for Statutory Auditors (*Code de déontologie*) of our profession. In addition, we have implemented a system of quality control including documented policies and procedures aimed at ensuring compliance with applicable legal and regulatory requirements, ethical requirements and the professional guidance issued by the French Institute of Statutory Auditors (*Compagnie nationale des commissaires aux comptes*) relating to this engagement.

Means and resources

Our work engaged the skills of ten people between September 2022 and March 2023 and took a total of 30 weeks.

We were assisted in our work by our specialists in sustainable development and Corporate Social Responsibility. We conducted around fifty interviews with the people responsible for preparing the Statement.

Nature and scope of procedures

We are required to plan and perform our work to address the areas where we have identified that a material misstatement of the Information is likely to arise.

The procedures we performed were based on our professional judgment. In carrying out our limited assurance engagement on the Information:

- we obtained an understanding of all the consolidated entities’ activities, and the description of the principal risks associated;
- we assessed the suitability of the criteria of the Guidelines with respect to their relevance, completeness, reliability, neutrality and understandability, taking into account, where appropriate, best practices within the sector;
- we verified that the Statement includes each category of social and environmental information set out in article L. 225-102-1 III as well as information regarding compliance with human rights and anti-corruption and tax avoidance legislation];
- we verified that the Statement provides the information required under article R. 225-105 II of the French Commercial Code, where relevant with respect to the main risks, and includes, where applicable, an explanation for the absence of the information required under article L. 225-102-1 III, paragraph 2 of the French Commercial Code;
- we verified that the Statement presents the business model and a description of principal risks associated with all the consolidated entities’ activities, including where relevant and proportionate, the risks associated with their business relationships, their products or services, as well as their policies, measures and the outcomes thereof, including key performance indicators associated to the principal risks;
- we referred to documentary sources and conducted interviews to:
 - assess the process used to identify and confirm the main risks as well as the consistency of the outcomes, including the key performance indicators used, with respect to the main risks and the policies presented,
 - corroborate the qualitative information (measures and outcomes) that we considered to be the most important presented in Appendix. Concerning certain risk⁽²⁾, our work was carried out on the consolidating entity, for the other risks, our work was carried out on the consolidating entity and on a selection of entities⁽³⁾
- we verified that the Statement covers the scope of consolidation, i.e. all the consolidated entities in accordance with article L. 233-16 of the French Commercial Code, within the limitations set out in the Statement;

(1) ISAE 3000 (Revised) – Assurance Engagements Other Than Audits or Reviews of Historical Financial Information

(2) Biodiversity and other environmental impacts; Equality in the workplace; Inclusive offers; Access to basic needs through digital technology; Inclusive digital technologies; Data protection and privacy; Democracy and freedom of expression; Electromagnetic waves; Young people exposure (inappropriate content, screen time); Responsible use; Transparency of offerings/Customer Relations; Interference with freedom of association; Business ethics and compliance; New ways of working.

(3) Orange S.A. (France); Orange Marine (France); Orange Belgique; Orange Cameroun; Orange Cyberdéfense (France); Orange Egypte; Orange Spain; Orange Mali; Orange Maroc; Orange Moldavie; Orange Roumanie.

- we obtained an understanding of internal control and risk management procedures the Entity has implemented and assessed the data collection process aimed at ensuring the completeness and fairness of the Information;
- for the key performance indicators and other quantitative outcomes that we considered to be the most important presented in Appendix, we implemented:
 - analytical procedures to verify the proper consolidation of the data collected and the consistency of any changes in those data,
 - tests of details, using sampling techniques, in order to verify the proper application of definitions and procedures and reconcile the data with supporting documents. This work was carried out on a selection of contributing entities⁴ and covers between 53% and 92% of the consolidated data relating to the key performance indicators and outcomes selected for these tests;
- for the key performance indicators calculated in a previous year or adjusted from a previous year, we have performed:
 - procedures to assess the appropriateness of the methodology used,
 - analytical procedures to verify the correct consolidation of the data collected and the consistency of the scope of the entities considered,
 - tests of details using sampling techniques, in order to verify the proper application of definitions and procedures and reconcile the data with supporting documents;

- we assessed the overall consistency of the Statement based on our knowledge of all the consolidated entities.

The procedures performed in a limited assurance review are less in extent than for a reasonable assurance opinion in accordance with the professional guidance of the French Institute of Statutory Auditors (*Compagnie Nationale des Commissaires aux Comptes*); a higher level of assurance would have required us to carry out more extensive procedures.

Nature and extent of additional work on the information selected by the entity and identified by the sign ✓✓

With regard to the information selected by the entity, presented in the appendix and identified by the symbol ✓✓ in the Statement, we conducted the same work as described in the paragraph “Nature and scope of our work” above for the Information considered to be the most important, but in a more in-depth manner, in particular with regard to the number of tests.

The selected sample accounts for between 54% and 100% of the information identified by the symbol ✓✓.

We believe that our work is sufficient to provide a basis for our reasonable assurance opinion on the information selected by the entity and identified by the symbol ✓✓.

Paris-La Défense, on March 2, 2023

KPMG S.A.

Jacques Pierre
Partner

Brice Javaux
ESG Expert
KPMG France ESG Center of Excellence

Appendix

Qualitative information (actions and results) considered most important

Digital access to essential needs policy
 Actions to support young people for digital solidarity
 Personal data protection policy
 Policy on democracy and freedom of expression
 Communication regarding electromagnetic waves
 Policies and systems for ethical and responsible digital management
 Customer Satisfaction Policy
 Collective agreements relating to social dialogue practices
 Equal opportunities policy
 Commitments to associations enabling the restoration and sustainable management of mangroves (carbon sinks)
 Product Environmental Rating Policy
 Inclusive offer Policy
 Business code of conduct and whistleblowing system

Key performance indicators and other quantitative results considered most important

Level of assurance

Number of employees – Active employees at the end of the period, by contract type, gender, age and geographical region	Reasonable
Number of permanent external recruitments (including under 30)	Reasonable
Percentage of women in management network	Reasonable
Training access rate	Limited
Frequency rate of occupational accidents	Limited
Severity rate of occupational accidents	Limited
Proportion of the ISO 14001 certified scope	Reasonable
Energy consumption (scope 1)	Reasonable
Electricity consumption (scope 2)	Reasonable
Scope 1 & 2 CO ₂ eq emissions	Reasonable
Scope 3 CO ₂ eq emissions in the digital segment (for the 2018, 2019, 2020 and 2021 financial years)	Limited
Share of renewable energies	Reasonable
Mobile phone recovery rate (in Europe)	Reasonable
Total waste	Limited
Rate of recovered internal waste	Limited
Number of visits (sessions) on the Group's main websites dedicated to digital skills and uses	Limited
Number of beneficiaries of digital support and training	Limited
Percentage of contracts signed including the CSR clause	Limited
Percentage of buyers having completed dedicated CSR training during the last two years	Limited

