

VIGILANCE PLAN 2022



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INTRODUCTION

This document describes Veolia's vigilance plan (the Plan) in application of French law no. 2017-399 relating to the duty of vigilance of parent companies and subcontracting companies. This plan is based on "reasonable due diligence measures to identify risks and prevent severe impacts on human rights and fundamental freedoms, on people's health and safety and on the environment".

Under this law, the Plan must include the following items:

- a risk map;
- an assessment of subsidiaries, suppliers and subcontractors;
- a whistleblowing system;
- action plans;
- a monitoring and assessment system.

Note that the structure of this plan does not necessarily follow the same order as the list of items above. This is a deliberate choice which reflects Veolia's appropriation of the requirements of the duty of vigilance law.

The Plan applies to the entire Group.



2022 ACTIVITY REPORT

Throughout 2022, Veolia ensured that the system implemented in the context of the duty of vigilance act met its requirements. In this respect, the following actions can be noted:

- **integration of Suez activities:** in the context of the merger between Suez and Veolia, the Group's duty of vigilance system was gradually extended to the Suez entities as they were absorbed;
- **further development of the Group's Environmental and Industrial Management System (EIMS):** the 2022 EIMS campaign has resulted in a simplification of the list of environmental and industrial risks, in order to make it more operational for the business units (BUs);
- **development of an online training course on human rights:** this e-learning aims to raise awareness among the Group's employees on human rights issues. This module thus enhances the communication aspect of the vigilance system implemented by Veolia.

The improvements made to the Group's duty of vigilance system as described above are in line with the improvement process promoted by the law.

GOVERNANCE

This section details the governance architecture implemented by Veolia in order to respond to the requirements of the law: the resources allocated for drawing up the Plan, the arrangements for monitoring it and, finally, the essential characteristics of the warning mechanism.

2.1 RESOURCES COMMITTED TO THE VIGILANCE PLAN

The following individuals and functions help manage and implement the Plan:

- Group Secretary General
- Functional departments:
 - Purchasing
 - Public Affairs
 - Compliance
 - Sustainable Development
 - Legal
 - Human Resources
 - Risks
 - Business and Performance Support

- Human Rights Manager reporting to the Compliance Department
- Network of compliance directors and officers
- Network of sustainable development directors and officers
- Network of human resources managers
- Representatives of operational areas

The Human Rights Manager is in charge of managing and coordinating the duty of vigilance process for the entire Veolia Group.

2.2 PLAN MANAGEMENT

The Human Rights and Vigilance Committee (the Committee) is the essential steering body for the Plan. In particular, made up of the individuals and functions listed above, it forms the cornerstone of the monitoring and assessment system as required by the duty of vigilance law. The Committee notably rules on:

- the selection of key performance indicators, their performance and their relevance;
- the nature and completeness of publications relating to the duty of vigilance;

- the validity of the conclusions of the risk mapping;
- the results of the action plans: progress, relevance, effectiveness, etc.;
- the follow-up given to alerts falling within the scope of the duty of vigilance law reported via the dedicated system;
- any ad hoc measure/question relating to the duty of vigilance.

2.3 WHISTLEBLOWING LINE

In accordance with the law's requirements, Veolia has implemented an whistleblowing system, available both to Group employees and third parties, to ensure that situations relating to the duty of vigilance are reported. Through this system, authors of reports are able to remain anonymous if they wish, even if this method is not recommended as it does not guarantee optimum processing of the reports received.

The Group Ethics Committee is in charge of this procedure. Upon receipt of a report under the duty of vigilance law, the Ethics Committee transfers it to the Compliance Department for

processing. At the end of its investigations, the Compliance Department submits its conclusions to the Ethics Committee which then closes the alert and archives it after having informed its author.

The link to be used by third parties to refer to the Ethics Committee is as follows:

<https://veolia.whispli.com/fr/tiers-ethique>

METHODOLOGY

In order to develop the Plan, the methodological approach applied needed to be specified as it determines the content of Veolia's response to the law's requirements.

3.1 SCOPE

As stated in the introduction, the Plan applies to all Group activities (Water, Waste, and Energy).

Veolia is organised into seven geographic zones (France and Special Waste Europe, Central and Eastern Europe, Northern Europe, Asia-Pacific, Iberia and Latin America, North America, Italy – Africa – Near and Middle East) plus a complementary global zone for global speciality businesses (Water Technologies). The organisation within the geographic zones is structured per country (operational unit or business unit) and the country directors are also responsible for the various business lines in their scope.

The merger between Suez and Veolia has resulted in substantial changes for the Group between 2021 and 2022:

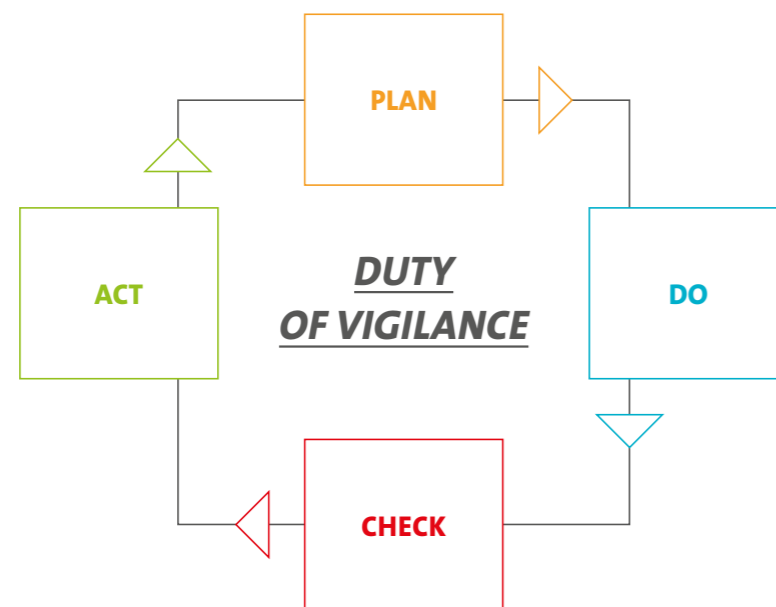
- wider geographical presence: from 52 to 58 countries⁽¹⁾;
- strong increase in turnover: from 28.5 to 42.9 billion euros;
- significant increase in the number of employees: from 176,488 to 213,684.

It should be noted that, in accordance with the requirements of the UK competition authorities, the Group did not exercise any control over Suez Recycling and Recovery UK throughout the period from the start of the merger between Suez and Veolia until the sale by Veolia to the new Suez of this waste business at the end of 2022.

3.2 APPROACH

The concern for monitoring and assessment promoted by the duty of vigilance law is part of a continuous improvement process. The latter is based on the Plan-Do-Check-Act (PDCA) approach which can be mapped out as follows:

This method appears relevant due to the cyclic operation on which it is based. If the method is implemented satisfactorily, it leads to a positive dynamic combining reflection, achievement and adaptation, which is meant to help organisations improve their performance.



⁽¹⁾ Countries in which Veolia has permanent operations with personnel and employed capital of more than €5 million.

3.3 RISK MAPPING

Risk assessment is an essential step in developing the Plan. Its results have a decisive influence on the policy and actions taken to meet the duty of vigilance law's requirements.

It should be emphasised that, unlike standard mapping, which is generally focused on the organisations sponsoring them, the duty of vigilance risk assessment is focused outwards on the direct impacts that the business activities may have on third parties⁽¹⁾.

Veolia's risk mapping is based on its own methodology developed by the Group's Risk Management Department. This approach is adapted, if necessary, to take into account the specificities of each of the themes falling within the scope of the law: human rights and fundamental freedoms, health and safety, environment, and supply chain.

The main risk mapping methods used are:

- working groups involving functional departments;
- questionnaires to encourage feedback to nurture analysis and reflections during the risk assessment;
- discussions between the head office and operations to ensure consistency and enrichment of the mapping process results.

For the sake of clarity, a separate presentation of the conclusions of the mapping for each of the duty of vigilance law's themes seemed the most relevant (see part 4 – Risk mapping results).

3.4 INDICATORS

Key performance indicators contribute to the duty of vigilance law's effectiveness because they help guide:

- deployment of actions taken and the assessment of their effectiveness;
- reflection on the application of the law by Veolia.

Their performance is presented in part 8 – Key performance indicators.

⁽¹⁾ Including employees of companies involved in the application of the duty of vigilance.

RISK MAPPING RESULTS

In line with the methodology developed in section 3.3, mapping conclusions are grouped into four separate sections corresponding to the duty of vigilance law's themes.

A presentation in the form of tables was favoured, the use of a materiality matrix not necessarily seeming the most relevant approach to best understand the issues related to the risks identified during the mapping stage. Similarly, a breakdown by theme seemed more judicious for a clearer understanding by the Group's stakeholders of the duty of vigilance risks induced by Veolia's activities.

The summary tables are structured as follows:

- Risk category: generic title of the identified risk;

- Example(s): illustration(s) of the materialisation of the risk;
- Possible cause(s): factor(s) that may be causing the risk;
- Possible consequence(s): potential impact(s) in the event of an incident.

It should be noted that the tables below present the main risks related to duty of vigilance themes. However, they are not exhaustive. The risk mapping will need to be regularly updated to ensure continuity of their relevance over time.

4.1 HUMAN RIGHTS

Following on from the analyses conducted in 2014 and 2016, and as acted in 2019 by the Human Rights and Vigilance Committee, the human rights risk map was updated in 2020 through a survey. It relied on a methodology developed by the Risk Management Department, combining the results of studies conducted at group level with contributions from the operational entities. Contrary to previous financial years, the 2020 survey was completed on a group-wide basis. A little over 520 employees took part in it. The latter were selected so as to ensure that the panel was representative of the human rights issue: purchasing, human resources, health and safety, business development, risk management, sustainable development, compliance, and executive managers.

The study found that the three most significant "human rights" risks for Veolia are:

- environmental and natural resources incidents;
- discriminations;
- health and safety.

This observation illustrates the interdependence of the topics covered by the duty of vigilance law.

On this basis, it was decided to present the risks such as the survey revealed them in the summary table below. However, in order to preserve the overall legibility of this chapter, issues linked to the environment and employees' protection at work are treated in the two dedicated sections on pages 10 and 11.

RISK CATEGORY	EXAMPLE(S)	POSSIBLE CAUSE(S)	POSSIBLE CONSEQUENCE(S)
Environmental and natural resources incidents		Refer to section 4.3	
Discriminations	<ul style="list-style-type: none"> • Discrimination against lesbian, gay, bisexual, transgender, and intersex people • Disability • Origins, religions, nationalities • Workplace gender equality: percentage of employment of women, percentage of women in management, percentage of female executives, percentage of women sitting on the boards of directors of the Group's companies, including Veolia 	<ul style="list-style-type: none"> • Lack of manager involvement • Lack of a human resources framework and procedures to deal with these subjects 	<ul style="list-style-type: none"> • Career hindered or blocked • Ostracism
Health and safety		Refer to section 4.2	
Freedom of association and right to collective bargaining	Workers unable to organise their representation	<ul style="list-style-type: none"> • Local legislation prohibiting unions • Management's refusal to dialogue with workers 	Deterioration of the company's social climate
Lifestyles of local communities	Native community affected by the presence of Veolia's activities	Lack of inclusion of local communities in projects	<ul style="list-style-type: none"> • Relocation of communities • Impact on communities' productive activities
Forced labour	Immigrant workers who may be taken advantage of due to their migrant status	Unfavourable cultural and legislative environment	Rights of vulnerable workers regarding issues such as pay, paid leave and freedom to terminate their employment contracts
Child labour	Children illegally sorting waste in landfills managed by Veolia	<ul style="list-style-type: none"> • Unsecured site • Existence of a sizeable informal sector • Poverty of local populations 	<ul style="list-style-type: none"> • Negative impact on the level of education • Injury • Death

Note: risks relating to suppliers and subcontractors are covered in section 4.4.

The risk of a cultural gap must be kept in mind to ensure the effectiveness of Veolia's human rights policy. The Group's initiatives to promote these issues internally could effectively be frowned upon and even backfire in certain countries in which Veolia operates.

4.2 HEALTH AND SAFETY

RISK CATEGORY	EXAMPLE(S)	POSSIBLE CAUSE(S)	POSSIBLE CONSEQUENCE(S)
Traffic at work	<ul style="list-style-type: none"> Traffic on public roads Co-activity between machines at a site 	<ul style="list-style-type: none"> Vehicle traffic standard insufficiently known and implemented Accidents caused by third parties 	<ul style="list-style-type: none"> Injury Death
Work in confined spaces	<ul style="list-style-type: none"> Work in sewers Work in a tank 		
Handling hazardous goods and chemicals	<ul style="list-style-type: none"> Handling chemicals in laboratories Unloading chemicals 		
Hot work	<ul style="list-style-type: none"> Use of an oxyacetylene torch Use of hand-held tools (grinder, etc.) 	Non-compliance with safety standards	<ul style="list-style-type: none"> Injury Death
Excavation and trenching works	<ul style="list-style-type: none"> Landslide (earth instability) Landslide of an excavation open on one side 		
High pressure – Hydroblasting	<ul style="list-style-type: none"> Cutting and/or perforation by water jet “Whiplash” physical trauma, blows received from an out-of-control flexible nozzle head 		
Use of electricity	<ul style="list-style-type: none"> Electric shock Electric arc burns 	<ul style="list-style-type: none"> Non-compliance with regulations and industry standards Non-compliance with safety standards 	<ul style="list-style-type: none"> Injury Death
Lifting operations	<ul style="list-style-type: none"> Hazards linked to loads (slinging problems, etc.) Contact or collision of a crane or its load with people or facilities 		
Work at a height	<ul style="list-style-type: none"> Work on a building’s flat roof Use of ladders 	Non-compliance with safety standards	<ul style="list-style-type: none"> Injury Death
Securing facilities	<ul style="list-style-type: none"> Incomplete lockout of energies (electrical, mechanical, hydraulic, pneumatic, etc.) Equipment that can move by force feedback 		

4.3 SERIOUS ENVIRONMENTAL INCIDENTS

The elements set out in the table below are based on the results of the 2022 annual campaign of Veolia’s Environmental and Industrial Management System (EIMS) (see section 6.3). The EIMS makes it possible to identify risks related to degraded operating

conditions or accident situations that could lead to serious environmental damage at the facilities operated by the Group, damage that could have repercussions on the water supply of local populations due to our activities.

RISK CATEGORY	EXAMPLE(S)	POSSIBLE CAUSE(S)	POSSIBLE CONSEQUENCE(S)
Discharges and emissions into the environment	<ul style="list-style-type: none"> Exceeding regulatory thresholds for discharges of wastewater treated by an effluent treatment plant Drinking water quality not compliant with the thresholds set by the legislation 	<ul style="list-style-type: none"> Technical failure of the system monitoring the quality of the wastewater to be treated Incorrect dosage of water treatment compounds 	<ul style="list-style-type: none"> River pollution Potential impact on human activities in the area concerned, including disruption of drinking water supplies
Quality and compliance			
Fire/explosion on a Veolia site	Fire in a sorting centre	Presence of lithium-ion batteries among the materials to be recycled	<ul style="list-style-type: none"> Stoppage of operation Air pollution by smoke from the fire and potential discharge of fire extinction water into the environment
Health and environment	<ul style="list-style-type: none"> Exceeding legionella bacteria thresholds in domestic hot water networks and/or air-conditioning facilities and/or in air cooling towers Presence of water unfit for consumption in the supply network 	<ul style="list-style-type: none"> Detection and monitoring system failure Polluting substance accidentally spilled in the area of a water treatment plant 	<ul style="list-style-type: none"> Disruption of operation Potential impact on the health of exposed persons

Note: this vigilance plan does not cover the fight against climate change as this does not fall within the scope of the duty of vigilance law, the primary aim of which is to protect workers and populations in the context of global supply chains. Beyond compliance with legal texts, the climate change issue is nonetheless a major subject which falls within our collective

responsibility. In this respect, Veolia’s commitment and actions to fight climate change are described in detail in our 2022 universal registration document⁽¹⁾, and in particular in the extra-financial performance report (see section 4.2.3 – Combat climate change).

(1) <https://www.veolia.com/fr/newsroom/publications>.

4.4 TIER 1 SUPPLIERS AND SUBCONTRACTORS

RISK CATEGORY	EXAMPLES(S)	POSSIBLE CAUSE(S)	POSSIBLE CONSEQUENCE(S)
Poor working conditions	<ul style="list-style-type: none"> Inadequate employee training in health and safety No provision of personal protective equipment to employees Production equipment that may affect employee health and safety (noise, odour, vibrations, processes using toxic substances) 	<ul style="list-style-type: none"> Non-compliance with health and safety standards in force Non-compliance with the jointly approved provisions and systems provided for in the prevention plan 	Endangering the physical safety of supplier and subcontractor workers
Failure to respect freedom of association and the possibility of collective bargaining	Lack of dialogue between management and employee representatives	<ul style="list-style-type: none"> Unions not recognised by law Oppressive social environment with regard to workers' rights 	<ul style="list-style-type: none"> Deterioration of the social climate among Veolia's suppliers and subcontractors Potential abuses of the rights of workers in Veolia's supply chain
Environmental incidents within the supply chain	Harmful discharges from supplier manufacturing sites	Weak environmental legislation in force	<ul style="list-style-type: none"> Impact on the environment Deterioration of the health of supplier and subcontractor workers Health of neighbouring populations affected
Forced labour	Immigrant workers who may be taken advantage of due to their migrant status	Unfavourable cultural and legislative environment	Rights of vulnerable workers: pay, paid leave and freedom to terminate their employment contracts
Child labour	Children employed by a supplier or subcontractor	<ul style="list-style-type: none"> Failure to implement local legislation on the prevention of child labour Sizeable informal economy 	<ul style="list-style-type: none"> Negative impact on the level of education Injury Death

ASSESSMENT

This section describes how Veolia meets the assessment requirement as laid down by the duty of vigilance law. This review is based, in particular, on the activities of the functional departments and the Internal Audit Department. The results of these analyses are detailed in section 6 – Actions.

5.1 MOBILISATION OF CONTROL LINES

The monitoring system deployed by the Group is based on the implementation of the "three lines of control⁽¹⁾" model. The level 2 role of functional departments aims to ensure that control procedures are properly implemented by the operational level (level 1). Internal audits⁽²⁾ for their part act as level 3 and are a function the purpose of which is precisely to evaluate organisational performance. It therefore has the appropriate methodological tools and approaches to make a broader assessment of the effectiveness and efficiency of the systems in place in view of the law's requirements.

The Group's "duty of vigilance" system is subject to an annual assessment led by the compliance function, which acts as a second-level control. The business units are questioned about the governance and the monitoring of risks and the dedicated action plans they are implementing. The elements provided by the operational entities are then reviewed by the Group's Compliance Department.

5.2 DIALOGUE WITH SUBSIDIARIES

The Committee is the main forum for discussions between the management and operational entities on matters relating to the implementation of the duty of vigilance. Representatives of the latter have the opportunity to share their experiences in this field (local initiatives, difficulties experienced, etc.).

These discussions are supplemented, where necessary, by ad hoc interactions between the Group's Human Rights Officer and the operational entities.

5.3 TIER 1 SUPPLIERS AND SUBCONTRACTORS

Veolia is committed to establishing long-term relationships with its tier 1⁽³⁾ suppliers and subcontractors. This commitment is necessary and essential given the complexity of the production processes implemented by the Group. The Purchasing Department applies a risk-based approach targeting purchasing categories. During the call-for-tenders phase, suppliers considered to be most at risk are required to submit a compliance/corporate social responsibility (CSR) questionnaire. This contains questions about its social, environmental and societal commitments and performance. In case of non-compliant answers to certain targeted questions, the buyer, with the help of the Compliance Department, can decide to remove the supplier from the panel. During the annual evaluation campaigns and strategic tenders, policies, actions and results of suppliers are subject to an additional assessment. This process also includes a "360°" review of whether the supplier is on any list of government sanctions, any convictions, and any links to politically exposed persons.

This assessment provides information on the supplier's CSR performance in the following four areas: environment, human rights, ethics, and purchasing. At the end of this process, these companies are given a score reflecting their CSR maturity. This result determines the possible implementation of actions by Veolia and the supplier based on the following categories:

- A: overall score in line with Veolia's expectations;
- B: overall score not in line with Veolia's expectations.

The associated action plans are detailed in section 6.5. During calls for tender, the supplier's CSR performance is thus systematically taken into account when evaluating their proposal, with a weighting of 5% to 20%. Eventually, in 2022, Veolia has generalised the use of its integrity assessment system for suppliers at risk, which is based on a software solution.

(1) The three lines of defence model can be described as follows: in terms of risk management, management control is the first line of defence, the various risk control and compliance functions, the second line, and the independent assurance function, the third line. Each of these three "lines" plays a separate role in the larger framework of the organisation's governance. (The Institute of Internal Auditors, Position Paper, January 2013).

(2) Internal audits are independent and objective, and provide an organisation with reasonable assurance on the level of control of its operations and guidance for improvement. They help the organisation achieve its objectives by systematically and methodologically assessing its risk management, control, and corporate governance processes, and provide recommendations to reinforce their effectiveness (source: Ifaci).

(3) Suppliers and subcontractors with which the Group has a direct relationship.

ACTIONS

6.1 WORK OF THE HUMAN RIGHTS AND VIGILANCE COMMITTEE

The Committee, the Group's central governance body in the duty of vigilance, plays an active role in implementing the law. The three meetings held in 2022 focused on:

- ensuring the implementation of action plans designed to improve the performance of Veolia's "vigilance" system, in accordance with the requirements of the duty of vigilance law;
- operating a monitoring activity: although the French duty of vigilance law is a reference in this area, it is in line with a more

global legislative movement. As such, other countries in which the Group operates have adopted similar laws (see section 6.2.2). Moreover, Veolia carefully follows the work currently being carried out by the institutions of the European Union aiming to establish a duty of vigilance applicable to all twenty-seven member states;

- oversee the development of an online training course to raise awareness of human rights issues among Veolia employees.

6.2 HUMAN RIGHTS IN THE WORKPLACE

6.2.1 Priority issues

Veolia has been a member of the United Nations Global Compact since June 2003. Under this Global Compact, it is committed to supporting and promoting the ten principles relating to human rights, labour law, the environment, and combating corruption. Veolia's principles of action also fall within the framework of international reference documents, including the Universal Declaration of Human Rights and additional pacts and the Organisation for Economic Cooperation and Development (OECD) guidelines for multinational companies.

Respect for these fundamental rights is naturally included in the human rights policy defined by the Group. The formalisation of the latter in 2016 led to the creation of the Committee in charge of managing Veolia's human rights system. The Group has also been committed for years to respecting the human rights of its employees, its subcontractors and suppliers as well as communities located in the regions in which it operates. This attachment to human rights is reflected in its sustainable development commitments as well as in the fundamental values and principles laid down in its Ethics Guide.

Veolia's human rights policy addresses eight priority issues:

- three issues related to the rights of the populations affected by its activities:
 - right to a healthy environment and protection of resources,
 - access to water and sanitation,
 - rights and respect of the lifestyles of local communities;
- five issues related to fundamental rights at work:
 - elimination of forced labour,
 - abolition of child labour,
 - elimination of discrimination,
 - promotion of freedom of association and collective bargaining,
 - right to a healthy and safe working environment.

The Human Resources Department and the Compliance Department are committed, with the Group's other functional departments and all the operational entities, to enforce these rights.

6.2.2 Implementation

FUNDAMENTAL HUMAN RIGHTS

In June 2019, Veolia organised, with the World Business Council for Sustainable Development (WBCSD) and the "Entreprises pour les droits de l'homme" (EDH) association, a morning of discussions on "Human rights and sustainable development objectives: involvement of CEOs, responsibility of companies and opportunities".

As Veolia is resolutely committed to these issues, the Chairman and Chief Executive Officer at the time, Antoine Frérot, co-signatory of the WBCSD's "CEO Guide to Human Rights", took advantage of this meeting to invite his peers to take action on these issues.

Veolia is also a member of the EDH, which brings together 26 major French companies. This organisation focuses its efforts on the operational implementation of human rights and, by extension, the duty of vigilance. EDH's vocation is to serve as a forum in which members can discuss the issues they face and best practices to overcome them.

In the context of its EDH membership, Veolia contributed to a study pertaining to the application of the duty of vigilance law⁽¹⁾ published in the French *Journal officiel* in 2020. On this occasion, the Group shed its light on the governance issue, a crucial subject for the effective implementation of this law.

Because of its business model, Veolia's operations are extensively decentralised. This gives the BUs considerable organisational freedom. In this respect, as part of the implementation of the duty of vigilance, the Asia zone has set up seven local human rights committees to monitor issues related to French law as closely as possible.

(1) https://e-dh.org/fr/actualite_accueil.php?IDactu=146.

FIGHT AGAINST MODERN SLAVERY

The United Kingdom and Australia passed Modern Slavery Acts (MSA) in 2015 and 2018 respectively. Modern slavery consists of labour exploitation practices which violate human dignity and fundamental rights: human trafficking, servitude, servitude for debts, child labour, forced labour, etc.

Considering their size, Veolia's entities in both these countries are concerned by these regulations. It was also decided to apply the Australian MSA rules to the activities based in New Zealand. The Group sees these two laws as an opportunity to strengthen its internal organisation in order to be able to fight modern slavery more effectively. In this respect, Veolia's local subsidiaries have deployed specific measures including:

- a steering committee involving internal stakeholders such as human resources, compliance, health and safety, legal, audit, sustainable development, purchasing, etc. This committee is responsible for defining the company's strategy on modern slavery and agreeing on action plans;
- a policy stating Veolia's commitment to combat modern slavery, explaining the general principles the Group intends to follow in this regard;
- an assessment to better understand the risks to which the operational entities are exposed;
- dedicated procedures explaining how to manage the modern slavery issue from an operational point of view;
- training programmes existing both in the United Kingdom and the Australia/New Zealand zone in order to raise awareness among personnel regarding modern slavery issues, including the identification of known situations and the principles of safe reporting;
- a public statement available on the external websites of the subsidiaries involved, in compliance with local legal requirements.

COHESION AND SOCIAL DIALOGUE

To promote social dialogue quality and development, Veolia ensures that it is properly implemented at all levels of the organisation:

- at company or establishment level, where many subjects having an impact on the daily lives of employees are negotiated, social agreements signed supplement the Group's directives and agreements;
- at country level, which brings together joint information and dialogue bodies dealing with all national cross-cutting themes;
- at group level, within the France and Europe Group committees.

Role of Group committees

Veolia has set up, by agreement, a France Group Committee and a Europe Group Committee. The Europe Group Committee represents more than two thirds of Veolia employees. It is composed of 17 countries: Belgium, Bulgaria, Czech Republic, Denmark, France, Germany, Hungary, Italy, Lithuania, Luxembourg, Netherlands, Poland, Portugal, Romania, Slovakia, Spain, and the United Kingdom. Following the merger between Suez and Veolia, in accordance with the agreement establishing the Europe Group Committee, three new full member positions were allocated to representatives from ex-Suez subsidiaries (two for Spain and one for Belgium), bringing the number of full members to 41. The censor, a former director representing the employees of Suez, is also invited to the meetings of Europe Group's Bureau and Committee.

France Group agreements and commitments made within the Europe Group Committee

SIGNATURE DATE	PURPOSE OF THE AGREEMENTS
2017-2018	New France Group agreement for the forward planning of jobs and skills. Agreement in the form of a letter of undertaking with the Europe Group Committee on developments in business lines and skills, particularly with regard to the company's strategic directions, thus supplementing the Group management's joint commitments with the Europe Group's Prevention, Health and Safety Committee.
2020	Amendment modifying the Group pension plan (PERCO) into a collective pensions saving plan (PERCOL), thus enabling Group employees to benefit from the advantages offered by the Pacte law. Agreement on social dialogue quality and development within Veolia France. This France Group agreement replaces the 2010 agreement on the same subject and provides, in particular, for the establishment of a global support, promotion, and recognition system in terms of the trade union career path.
2021	Amendment to the 2018 letter of undertaking on "supporting changes in jobs and skills, particularly in relation to the Group's strategic directions" and integrating the "diversity and inclusion policy within the Group". This amendment follows the priorities for action relating to diversity and the fight against the various types of discrimination identified by the dedicated working group of the Europe Group Committee. France Group agreement on telework during normal periods. This framework agreement defines a general system for the use of telework that is fair and applicable according to the same guiding principles throughout the Group in France.
2022	Three-year agreement of 2015 on the Group's strategic orientations renewed in 2022. It provides for an annual exchange of views with the offices of the French and Europe Group committees (known as the joint bureau) on the Group's strategic orientations and their impact on the workforce, employment and skills. On this occasion, the topics of ethics, the Sapin II law and the duty of vigilance are also the subject of exchanges of views and presentations.

Group committees are Veolia's key transformation players. They receive information on activity, the financial situation, and employment. They must be informed in the event of a restructuring plan, acquisition or disposal, as was done throughout the merger between Suez and Veolia. They are also informed and consulted each year through discussions on the Group's strategy and its social consequences.

The agreements signed with trade unions at Group level in France as well as the agreements in the form of joint commitments made within the Europe Group Committee bear witness to management's desire to structure quality social dialogue with employee representatives and thus contribute to the Group's action in favour of all its employees.

Review of collective bargaining agreements

In 2022, almost 1,533 new collective bargaining agreements were signed by establishments, companies, or Group bodies in each country. All of these collective bargaining agreements have an impact on the company's social and therefore economic performance.

44 countries were signatories to these agreements. The top five were France, Japan, Germany, Poland, and Spain. At the end of 2022, the number of employee representatives worldwide stood at 8,910. 141 strikes were recorded in 2022, representing 0.01% of the total number of days worked.

Global Deal membership

Veolia actively participates in Global Deal France working groups, in particular, on the future of work and skills development. Veolia's experience of international social dialogue focused on skills was presented in 2019 in the publication "Global Deal members commit to the social G7" and more recently in 2021 on the creation of a social dialogue quality index, currently being validated within the Global Deal bodies and its partners at the ILO and OECD. In 2022, Veolia participated in the working group on the challenges of the duty of care.

DIVERSITY AND INCLUSION

Diversity and inclusion are intrinsically linked, their promotion being a means of combating all forms of discrimination.

Diversity policy

The Veolia Group is committed to ensuring respect for diversity and fundamental human and social rights within the company. Diversity is a fairness, performance, appeal and credibility issue for the Group. To encourage this, Veolia has implemented a policy based on the values of respect and solidarity between all employees for several years. In the Diversity & Inclusion 2020-2023 letter of undertaking, Veolia reaffirmed its ambition to be an ever more diverse and inclusive company, guaranteeing respect, fairness and individual social advancement.

This letter restates the three priorities of the Group:

- ensuring fair and non-discriminatory HR processes for all categories of staff, from the moment they join the company right through to the end of their careers;
- guaranteeing non-discriminatory access to employment at Veolia (in terms of age, origin, disability, gender, sexual orientation or religion);
- guaranteeing the development of social dialogue and employees' freedom of speech.

In accordance with applicable local laws and regulations, Veolia does not permit or support any type of discrimination on the basis of age, health status, gender, gender identity, sexual orientation, pregnancy, disability, origin, religion, political opinions, philosophical opinions, family status, morals, patronymic, trade union activities, place of residence, vulnerability resulting from economic situation, migrant status, real or supposed membership or non-membership of an ethnic group, nation or so-called race⁽¹⁾.

⁽¹⁾ This list of examples of discrimination has been drawn up for the sake of clarity and is by no means exhaustive. As such, any other type of discrimination not mentioned in this list is strictly prohibited by Veolia.

The diversity approach

The diversity policy is supported by a global network of officers who have the following key tasks:

- implementing commitments in relation to local issues;
- establishing diagnoses and action plans adapted to the context;
- measuring the results;
- promoting innovative actions in line with Veolia's values.

In order to measure the impact of actions linked to diversity, Veolia monitors several indicators:

- **gender equality at work:** employment rate of women, percentage of women in management, rate of departure of women, percentage of women in top management, percentage of women on the boards of directors of Group companies;
- **disability:** employment rate of individuals with disability;
- **seniors:** employment rate of the over 55s;
- **young people:** employment rate of the under 30s.

In 2022, a review of the subject of diversity and inclusion at Veolia was launched at the time of the merger of Veolia with Suez. The representatives of the WEDO and ex-Suez D&I networks took part in an internal survey (questionnaire and interviews) which made it possible to better understand their expectations and to draw up an inventory.

As a result, a new Diversity & Inclusion action plan was finalised, with the aim of fostering a culture of inclusion which ensures that each employee is treated without discrimination, is recognised in his or her uniqueness and is treated as a full member of the company's team. It is structured around four priority targets:

- diversity;
- gender identity;
- disability;
- social and ethnic origins.

This action plan was presented to the HR managers of the Group's entities and to the key contacts of the local Diversity & Inclusion networks. A sequence dedicated to Diversity & Inclusion issues was included in the Group's VIP integration programme (presentation of the action plan and awareness of unconscious bias).

More than 400 Group managers attended this new sequence in 2022.

Gender diversity within the Group

Percentage of women in the Group

	2019	2020	2021	2022
Percentage of women	21.1%	21.4%	21.7%	22.3%
Percentage of women among managers	27.3%	28.3%	29%	30%
Percentage of women in external recruitment of managers on permanent contracts	32.8%	30.9%	33%	35%
Percentage of women among executive managers (Executive Resourcers)	18.2%	21%	22.2%	25.2%
Percentage of women on Veolia Environnement's Board of Directors	45%	45%	50% ⁽¹⁾	60% ⁽²⁾

Since 2020, 30.3% of women have been appointed as senior executives (Executive Resourcers). The percentage of women among the Group's executives (Executive Resourcers) has increased from 15% in 2016 to 25% in 2022.

Workplace gender equality

To attract talent and give roles to women, at all levels and across all of its business lines, the Group has provided an action plan dedicated to workplace gender equality, in order to:

- develop gender balance in operations;
- increase the number of women sitting on the Group's management bodies and working in management;
- promote gender diversity in the Group's representative bodies.

To promote gender diversity and workplace gender equality, Veolia has set itself quantified objectives:

- more than 40% women on the Board of Directors of Veolia Environnement;
- 30% female managers in 2023;
- 35% of managers recruited on permanent contracts each year to be women;
- 50% of women appointed are among the senior executives (Executive Resourcers) between 2020 and 2023;
- 25% women among the Group's executives in 2023 (Executive Resourcers); 30% in 2027 and 40% in 2030.

The Group's actions to develop gender diversity in management are structured as follows:

- **recruitment:** inclusive recruitment process and young talent policy, creation of a pool of women leaders;
- **identification:** executive succession plan including at least one woman for each executive, 50% women in staff reviews of high potential by 2023; additional staff reviews for women below the rank of Executive Resourcers;
- **development:** include 40% of women in the Veolia Excellence programme and 30% in the director seminar, develop mentoring by senior managers for high-potential women managers.

■ Various initiatives in favour of workplace gender balance have been deployed in the various countries in which the Group has operations with the support of the WEDO network. The WEDO network is Veolia's internal network, dedicated to gender diversity, bringing together men and women working for Veolia who want to promote gender diversity within the Group. At the end of 2022, this network had more than 3,200 employees from around 50 countries.

- The actions carried out by the network included the renewal of the "Yes WEDO Week" which followed the theme chosen by the UN for 8 March 2022: "Gender equality today for a sustainable tomorrow". This week, dedicated to internal and external awareness-raising activities, was another success:
 - 48 entities (+10 vs 2021) on five continents organised more than 150 actions: interventions with young girls in schools, hosting middle and high school girls at Veolia sites to discover Veolia's businesses, conferences and webinars for employees on gender equality issues, etc.
 - Two new local networks were launched on this occasion (South Korea and Germany).
 - 220 new members joined the WEDO network on this occasion.

At Group level, a series of webinars, workshops and conferences were organised digitally. Two webinars brought together the Group HR Department, the BUs' HR departments and the WEDO network points of contact to review the situation of women within the Group (including the ex-Suez perimeters) and the six action levers to be strengthened in order to progress: attracting / retaining / reducing pay gaps / promoting / developing / transforming the culture.

An external communication campaign on social networks was carried out in cooperation with the management of stakeholders and the Communication Department via a series of 15 podcasts, "#WomenVoices", which allowed women leaders of the Group and representatives of our stakeholders committed to ecological transformation to share their testimonies.

■ A development program called "Women in Leadership" (WIL): initiated by Veolia in North America, WIL has gradually been deployed in other geographical areas: Africa (Morocco), Latin America (Colombia, Mexico) and the Asia-Pacific region; WIL also has a Group programme open to female participants from all geographic areas. This seven-month coaching programme, which aims to create career development opportunities for women managers within the organisation, was taken by 62 women from 16 French-speaking countries in 2022. This programme alternates between group and individual sessions, face-to-face and remote sessions. Digital coaching and remote workshops ensure flexibility and impact, and maximise interaction by organising regular meetings between participants and their managers, who also benefit from the programme. WIL's success is measured by its high satisfaction rate. In 2022, the programme achieved a recommendation rate (NPS) of 91% from participants.

■ The online awareness-raising module to combat ordinary sexism at work, launched in September 2020 with a pilot group of 1,000 people in France, was deployed more widely in 2022 at Veolia in France, Belgium and Luxembourg, Italy and Portugal, i.e. a total of 1,603 employees who have gone through the module. It is currently being tested with other entities for wider deployment. This module completes the awareness-raising actions already implemented in several Veolia entities.

■ Regarding the workplace gender equality index that companies with more than 50 employees in France are required to publish, the results of Veolia entities in France, published in March 2022, are almost all above 75 points out of 100 (legal minimum) for a global index of 87 points out of 100. This result stems from Veolia's efforts over many years to create attractiveness and career prospect conditions enabling women to grow at the same level of remuneration and career as men.

Support for United Nations LGBTI standards of conduct for business

In line with its CSR commitments, its human rights policy, and its membership to the Global Compact, Veolia has given its support to the United Nations standards of conduct for businesses with a view to combating discrimination against lesbian, gay, bisexual, transgender, and intersex people. The five standards were developed by the Office of the United Nations High Commissioner for Human Rights.

Lasting partnerships

The Group is a partner and member of several organisations promoting diversity and equal opportunities, including the United Nations Global Compact. In June 2016, Veolia entered into

a partnership with the "Elles bougent" association, which organises field meetings for female high school and university students with female mentors, engineers or technicians from Veolia or other companies, as well as male engineers from Veolia. Their accounts of their career paths are aimed at showing girls that technical professions are open to them. This partnership is an extension of the actions deployed by the Group's Schools and Universities Relations Department.

Within the framework of this partnership, Veolia has participated in various operations such as "Elles bougent pour le numérique", the InnovaTech challenge and the Réseaux et Carrières forum. Veolia is also a partner of the Association française des managers de la diversité (AFMD) and the À Compétence Égale association.

Employment and integration of people with disabilities

The percentage of Veolia employees with disabilities worldwide was 2.4% at the end of 2022, i.e. 3,978 employees. This rate was 3.7% in France for the same year, and €12.1 million were devoted to the protected and adapted sector. Veolia wants to change perceptions, develop representations related to disability, and support the integration of people with disabilities. The actions taken in this area are of several kinds.

Signing of the International Labour Organisation's Business and Disability Charter

On the occasion of the International Day of Disabled Persons on 3 December 2022, Estelle Brachlianoff, CEO of Veolia, signed the International Labour Organisation's Business and Disability Charter.

Launched in 2016 by the International Labour Organisation (ILO), the Business and Disability Charter is a global network for companies seeking to improve employment of people with disabilities. This charter expresses the commitment of signatory companies to promote and include people with disabilities in their global operations.

By signing this charter, Veolia commits to the following ten points:

- respecting and promoting rights;
- non-discrimination;
- equal treatment and equal opportunities;
- accessibility by gradually making the Group's premises accessible;
- maintaining employment so that any person with a disability can keep his or her job;
- confidentiality of personal information of persons with disabilities;
- consideration of all types of disability;
- collaboration through the promotion of employment of people with disabilities;
- evaluation of integration policies and practices;
- sharing information about progress in deployment.

(1) Excluding directors representing employees in accordance with the L. 225-27 and L. 22-10-7 articles of the Code de Commerce.

(2) Excluding directors representing employees and employee shareholders in accordance with the L. 225-27 and L. 22-10-7 articles of the Code de Commerce.

This signature was promoted internally on the occasion of the International Day of Persons with Disabilities in early December. During a webinar, different actions were presented:

- Veolia's commitment at the highest level through the signing of the Charter;
- the launch of an e-learning programme to raise awareness of the issue of disability;
- a "digital notebook" which summarises the actions (about forty collected) implemented in this field by the Group's entities;
- testimonies from HR managers in the countries where they have implemented actions and the testimony of a disabled employee involved in high-performance sport.

A video of the signing was published on the intranet site and in the Veolia News newsletter.

In addition, several Group entities in various countries have implemented action plans and deployed awareness-raising campaigns aimed at better consideration of people with disabilities, in line with the legal framework specific to each country.

In France, as part of the Employment of People with Disabilities Week, the Disability Units based at the headquarters organised a remote conference on the theme of "Nutrition and invalidating diseases". At the same time, an immersive virtual reality experience was proposed in order to remove unconscious bias towards people with invisible disabilities. Eventually, the head office entities have set up an awareness-raising poster campaign in the break areas, in the form of riddles.

Amendis (Veolia Morocco) is committed to the inclusion of people with disabilities. The Moroccan labour market does not impose a minimum rate of recruitment of people with disabilities in the private sector, however Amendis has set an annual recruitment rate of 1.5% (in relation to its total workforce). In order to achieve this objective, Amendis has put in place various actions, such as the creation of a map of roles based on the World Health Organisation's (WHO) disability reference framework and a classification of accessibility of professions according to the type of disability defined by the WHO.

Veolia Australia has partnered with a school that caters for students with learning disabilities. Veolia regularly welcomes students and gives them a professional assignment during the school holidays. On this occasion, the employees hosting these students are made aware of the inclusion of people with mental disabilities.

Signature of the Manifesto for the inclusion of people with disabilities in economic life

On 18 November 2019, Veolia signed the "Manifesto for the inclusion of people with disabilities in the workplace", a charter of operational commitments already ratified by around 130 companies in France.

As part of this signing, several working groups have been set up to implement the ten commitments of the Manifesto. Veolia is part of the working group on commitments 1 and 2 of the Manifesto: welcoming disabled pupils into companies, from the 9th grade onwards, and giving disabled pupils and students access to the business world, particularly through apprenticeships, work-study contracts and internships in company.

The aim is to bring together the worlds of education and business, to raise awareness of disability and to demonstrate that it is not a taboo at work or a barrier to employment.

In 2022, Veolia Water France took part in round tables and forums to discuss about the Group's disability policy and the opportunities available in the company to people with disabilities. In 2022, the working group on commitments 1 and 2 has proposed a number of areas for development. They concern the support of young people with disabilities in order to limit drop-outs, the extension of the network of partner associations throughout France to better reference the working group and its actions, and a more formal cooperation with the Conférence des grandes écoles (CGE), whose objective is to support young people in their training and integration path.

Social inclusion

Veolia in Australia has rolled out the Reconciliation Action Plan (RAP) which is a "reconciliation" plan with local indigenous communities. It aims to facilitate cultural and social change, to concretely reduce inequalities and to combat all forms of discrimination, in particular to fight against racism. The programme focuses on four key areas: education, employment, community, and business development. The main features of this project are partnerships with recruitment agencies, training and education, and culture. As part of this plan, Veolia has committed to achieving an Aboriginal and Torres Strait Islander employment rate of 4% at least.

Discrimination-free recruitment

Following the self-diagnosis of recruitment practices with regard to non-discrimination, which was carried out in September 2021 with a panel of new employees from the Waste Solutions, SADE, Veolia Water in France, the head office and Veolia Water Technologies entities, an action plan was formalised with the provision to recruiters and managers of various media, including the e-learning training module "Recruiting without discrimination", the corresponding online guide and the tools proposed by the non-profit organisation À Compétence Égale. To this end, the head office organised four "Recruiting without discrimination" webinars for its employees. Almost 500 employees attended the sessions.

The partnership with the association À Compétence Égale has also been renewed for 2022. It enables Veolia recruiters to draw on best practices from other companies, to receive legal advice or even to participate in workshops on this topic.

6.3 ACTIONS RELATING TO SERIOUS ENVIRONMENTAL RISKS

Veolia's activities likely to impact the environment are mainly in the fields of water (drinking water and industrial water production, wastewater treatment), waste (treatment and recovery of all forms of waste, including hazardous waste), and energy (energy production plants, operation of local energy loops, building and industry energy services). The points to be closely monitored especially for operated facilities are, for example, atmospheric emissions (heating plants, incineration plants, CHP), liquid effluents (particularly those from treatment plants operated), the impact of waste generated and its treatment, risks of explosion or fire, and the preservation of soil and biodiversity. In order to improve the management of its environmental impacts, the Group has implemented an Environmental and Industrial Management System (EIMS) in each of its business units to:

- measure and continuously improve the main points relating to environmental performance;
- identify the main environmental risks linked to our operations and the corresponding prevention actions.

The 2022 EIMS campaign has resulted in a simplification of the list of environmental and industrial risks, in order to make it more universal and thus more operational for the BUs. Besides this campaign led to the definition of 598 action plans intended to improve the environmental performance of the Group's operational entities, including circular economy, biodiversity and water resource preservation.

At operational level, due to the potential seriousness of the incidents that may occur at its operating sites (waste treatment centres, landfills, incineration plants, heating plants, drinking water production plants, wastewater treatment plants, etc.), Veolia implements various types of risk management and control actions:

- the prevention of incidents likely to cause damage to property, and consequently to people, or to the environment by implementing procedures aimed, on the one hand, at ensuring the conformity of facilities and monitoring their operation and, on the other, at better controlling risks; the environmental management approach is one of the mainstays of this approach, in particular by means of an external certification process (ISO 14001, industry standard, etc.);

- internal or external audits to identify and prevent industrial risks (fire, machine breakdown, environment, etc.). Thus, in 2022, the risk engineers of the Group's insurers carried out some 64 site inspections. These annual programmes ensure regular monitoring of the most exposed facilities over time.

In addition, a Group Prevention Committee (GPC), in which several members of the Veolia Management Committee participate (Chief Executive Officer, Financial Director, Technical Director, General Secretary), including the Group Risk and Insurance Manager, is in charge of overseeing the fire risk reduction strategy with the aim of improving fire detection, containment, and automatic extinguishing capacities on operating sites. This goal is expressed in different ways:

- the definition of technical standards validated by the risk engineers of the Group's insurance providers;
- a multi-year investment plan of several tens of millions of euros.

The action plans approved by the GPC are jointly monitored by the Business Support and Performance Department as well as by the Risk and Insurance Department. These two departments regularly report on the level of deployment of the fire reduction programme to the GPC.

Veolia's decentralised structure also allows operational entities to take initiatives that go beyond the Group's standards. The United Kingdom and Ireland are ISO 22301 certified, which corresponds to the international business continuity reference standard. Consequently, these business units benefit from an integrated management system which strengthens their capacity to reduce environmental impacts of incidents occurring on their operating sites.

6.4 HEALTH AND SAFETY ACTIONS

6.4.1 Health and safety in the face of a health crisis

As part of the management of the Covid-19 crisis, Veolia had to adapt its working methods and the operation of its sites throughout the world. At the peak of the crisis, most employees continued to travel to sites every day and to undertake their work in the field without interruption in order to maintain essential service continuity. A business continuity plan was thus established for each Veolia activity identified as vital. This global and durable set of measures made it possible to protect all our employees and to significantly restrict the number of clusters. The crisis unit has remained in place since then to monitor, analyse situations at global level and define priorities with regard to the various contamination phases in each country. In 2021 and 2022 (for the 4th dose), vaccination campaigns were deployed, where possible, in head offices and operational units. This voluntary scheme enabled several thousand employees to be vaccinated.

6.4.2 The Group's International Health and Safety Week

Veolia has organised an International Health and Safety Week since 2015 in order to establish health and safety at work in the corporate culture. This event is one of the Group's main levers for achieving "zero accidents". The 2022 edition was built around two themes: awareness of unconscious errors focusing on hand-eye coordination and the identification and treatment of HIPOs through a challenge (a HIPO, or High Potential, is an incident of minor or significant severity that realistically, under slightly different circumstances, could have reached a serious or very serious level of severity). More than 900 HIPOs were submitted by the field teams and the winning entries were on topical subjects (risk of vehicle-pedestrian collision on sites and elimination of risk of intervention in confined spaces through the use of drones). The treatment of HIPOs is key to reducing situations leading to serious accidents.

6.4.3 Risk mapping and the ten management standards for high-risk activities

In order to improve control of its major risks, ten management standards for high-risk activities have been drawn up (e.g. work in confined spaces, making installations safe, work in excavations and trenches, etc.). This list, common to all Veolia's businesses, was drawn up by the Prevention, Health and Safety Centre of Excellence after analysing the history of events that have occurred at Veolia. An evaluation matrix to evaluate the level of compliance with the human, organisational and technical requirements of the management

standards for high-risk activities was also drawn up to support the operational deployment within the operations. The implementation is first monitored within each country, then in each zone and is finally consolidated at Group level. For example, the overall compliance level for the delegated area of Latin America is 88.3% at the end of 2022, verified by several on-site audits after self-assessment.

As part of the integration of employees from Suez and the adaptation of the health and safety guidelines to ensure that they are better understood by all employees, joint working sessions have been set up to share and supplement each of the ten management standards for Veolia's high-risk activities as necessary. Thus, the first five standards were revised at the end of 2022. The others are under review.

New employees in the sector were fully welcomed and more than 300 new health and safety officers were trained (through four webinars and e-learning sessions), to ensure that the policy and tools are properly understood. The first joint project was to make common "Rules for saving lives" more legible, to illustrate the most dangerous situations in line with health and safety standards. Applicable to all, they are the last barrier for protecting employees from serious accidents.

Moreover, Veolia has implemented safety management systems (SMS) based on standards such as ISO 45001, ILO OSH 2001, and/or OHSAS 18001. Each year, throughout the world, entities are certified, labelled or rewarded for their prevention, health and safety approach.

By the end of 2022, the proportion of Veolia's revenue covered by an SMS (ISO 45001, ILO OSH 2001 or equivalent) reached 62.04%.

6.4.4 Global management of accidents

The PaTHS (Prevention & Training on Health & Safety) programme, which is currently being rolled out, includes a collaborative tool and a mobile application.

This programme will significantly improve and harmonise the management of health and safety events, strengthen benchmarking between geographies and build a reliable database and a predictive approach to risks. The tool also allows you to anticipate and manage the various training courses, authorisations and clearances relating to health and safety. Alerts are generated to anticipate the expiration of authorisations and clearances. This process allows for the systematic management of all sensitive training (such as chemicals, confined spaces, explosive atmospheres, work with hot spots, work at heights, consignment, etc.) and the production of a health and safety passport for each employee that can be shown at any time (on paper or digitally) to a supervisor, auditor, client, or other stakeholder.

The programme has made good progress, moving from 51.3% coverage of Veolia's workforce at the end of 2021 to 62% at the end of 2022. The coverage objective at the end of 2023 has been set at 70% of the Group's workforce.

6.4.5 Risk assessment, site safety audits and visits, follow-up of action plans

A risk assessment, safety audits and visits to facilities are carried out prior to taking or starting operations to detect possible risks and suggest corrective measures. Risk prevention measures are also integrated as far upstream as possible by the Group as part of the facility design and construction activities in order to eliminate any hazardous situation and guarantee a level of health and safety for future operators, whoever they may be.

At the same time, business units set up audit programmes to develop a health and safety culture and/or ensure the application of health and safety requirements defined at least by the country's regulations, the rules of Veolia Corporate, the business unit or customers. These pre-audits include all stakeholders and the frequency of the audits allows for a review of each operating site at least every two years. Self-assessments are carried out in addition to the biennial audits. Corrective and preventive actions must be implemented following the analysis of the audit results. In addition, the members of the Group's Health and Safety Prevention Department carry out annual audits to assess the level of implementation of the standards and the level of maturity of the health and safety culture.

In 2022, a dedicated system was set up for the most accident-prone entities, i.e. the 19 entities with a workforce of more than 500 FTEs and a frequency rate of more than 10, which represents 5% of the entities. The BUs with accident-prone entities have each drawn up an inventory of their situation and a specific action plan, which was shared at a strategic meeting with the Health and Safety Department. Some of them were also audited by health and safety experts to gain a better understanding of the situation, understand the areas for improvement and adjust the initial action plan as part of a continuous improvement process. As a result of this process, a health and safety performance contract was drawn up. These contracts will enable differentiated and qualitative monitoring of the BUs. In addition to the contribution made by the BUs, these strategic audits make it possible to identify cross-functional areas to be strengthened at Group level.

The Group's Health and Safety Department carried out 20 audits in 2022 (Japan, India, South East Asia, Canada, Ghana, Ivory Coast, VNS France, SADE Costa Rica, 4 regions of RVD, SARPI, SEDE, VIGS Slovenia and Austria, etc.) and visited more than 200 sites and worksites.

At the end of 2022, a self-assessment grid with 12 key questions, drawn up jointly with the Internal Control Department, was deployed specifically on health and safety in addition to the usual themes. It allows existing approaches to be reinforced with a global and synchronised vision to help target progress and audits. The participation rate was 100% with 66 questionnaires. The results show a very good maturity on the different pillars as 87% of the answers are between satisfactory and strong. Regular presentations to the Executive Committee make it possible to check the consistency between the Group's strategy and the actions completed.

Sharing of good practices

Believe News is a monthly collection of health and safety initiatives based on good practices reported by the different countries. It is intended to guide managers in the deployment of the standards and to promote good practices on the sites in order to create the necessary emulation for the deployment of these standards.

As a continuation of each Believe News, educational posters are produced to make good practices accessible to all and to encourage the sharing of good ideas.

In addition, innovative field practices in the area of health and safety at work have also been identified, capitalised on and shared within the Group. More than 1,000 good practices were reported in 2022. Several of them were awarded the Always Safe trophies by Veolia's Executive Committee, thus underlining the total integration of the health and safety dimension in the company's social and societal policy.

Provision of personal protective equipment

Veolia provides all employees with personal protective equipment (PPE) at work that meets the best international standards. PPE is provided to each employee in a quantity that takes into account the risk assessment and is renewed periodically.

A joint commitment

Occupational health and safety issues are fully integrated into social dialogue. In 2022, 10.9% of the agreements signed related to prevention, health and safety (10.7% in 2021 and 10.2% in 2020). In order to involve and share even more with the social partners on the prevention, health and safety approach, it was decided at the European Group Committee meeting on 22 June 2022 to create a dedicated working group, made up of representatives from eight countries (Germany, Spain, the United Kingdom, France, Slovakia, Belgium, Romania and the Netherlands), of which the main themes defined by the working group are as follows:

- the value of health and safety monitoring indicators;
- social dialogue on health and safety;
- health and safety policy within the Group;
- psychosocial risks;
- human and organisational factors: the commitment of people;
- well-being at work.

Raising awareness and training

Training is one of the five pillars of the prevention, health and safety at work policy.

At the heart of the social performance of Veolia's corporate purpose, the target of "zero accidents – one choice" has been set for all our business activities. To support this commitment, it is essential to periodically reinforce the "non-negotiable" elements of the prevention, health and safety culture at all levels of our organisation. In 2022, 74.3% of Veolia employees received training on safety or integrating an important safety component (72.1% in 2021, 67.5% in 2020) and 42.3% of training hours were devoted to safety (45.6% in 2021 and 46.5% in 2020).

Developing a health and safety culture: the OHS Skills programme

Initiated in 2019, the Group has deployed OHS Skills, a programme that is part of a global project to support cultural change in safety. In particular, it is based on the Occupational Health and Safety Management Framework and on the ten management standards for high-risk activities.

This programme is aimed at health and safety prevention functions and its objectives are to maintain technical skills on the fundamentals, to develop their knowledge and to enable them to support managers in the field so that they can improve their mastery of safety visits in the first instance, and then of safety talks, risk analyses and incidents.

The objective is to share a safe mindset and acquire best leadership practices to create a positive impact on teams, as well as to support managers in integrating these practices into their daily work to strengthen the occupational health culture at Veolia. By the end of 2022, 113 experts from various business units have been trained or are in the process of being trained.

At the same time, a prevention leadership module is now available for the entire management line. It is then supplemented by field coaching sessions, carried out by internal health and safety experts who have completed at least the two modules: "Expert prevention leadership" and "Becoming a prevention coach". By the end of 2022, 448 managers have been trained in different business units.

E-learning programme on management standards for high-risk activities

In addition to the management standards for high-risk activities deployed throughout Veolia since 2016, a programme of ten digital training courses on the Group's high-risk activities was launched in April 2021 by the Health and Safety Department and Veolia Campus.

The aim of this system of ten e-learning courses is to strengthen the safety culture at all levels of the organisation, to increase the perception of hazards for each high-risk activity, to increase employees' knowledge of risk control measures and to ensure that Veolia's standards are known and understood by all employees, as well as by external stakeholders (subcontractors, service providers, suppliers, clients), and that they are effectively adopted.

The first three courses on "Health and safety prevention culture associated with traffic at work", "Making installations safe" and "Working in confined spaces" carried out in 2021 were supplemented in 2022 by "Working at heights" and "Working with hot spots". After extensive design work, these modules are currently being rolled out to all Veolia entities. The "Health, safety and traffic prevention culture at work" course concerns all Veolia employees. It is already more than 50% deployed by the end of 2022 and should be fully completed by the end of 2023. All the BUs have also chosen two to three major risks as priorities for training the populations exposed to the risks by the end of 2023. All modules are to be deployed by the end of 2025.

Eventually, an e-learning module to accompany the deployment of the "Rules that Save" has also been created in 2022, in order to promote their appropriation by all employees. Currently being translated to cover all the languages used in the Group, it will be available to all employees from 2023.

Analyse to prevent risks

The Group pays particular attention to raising the awareness of its employees and monitoring risk situations and near misses. In order to prevent accidents, the Health and Safety Department uses the Bird pyramid, which has five levels:

- near misses, dangerous acts, dangerous situations (base of the pyramid);
- minor accidents;
- accidents at work without time off with medical consultation;
- accidents with lost working time;
- fatal accidents at work.

Also, for many years, the Group has implemented a procedure in place to investigate incidents and accidents in the workplace with the aim of prevention, including "safety alerts". In the event of a job-related accident, the health and safety officer submits a report to the Group's Health and Safety Department, based on a template detailing the circumstances, the consequences of the event and the corrective measures taken (human, organisational and technical). A more in-depth analysis is made for serious accidents. These safety alerts are then shared with the entire health and safety network and more widely on the Group's intranet.

6.5 ACTIONS TOWARDS OUR TIER 1 SUPPLIERS AND SUBCONTRACTORS

The purchasing compliance programme includes items linked to human rights, health and safety, ethics and the environment, and is based on the following pillars: identifying risks and segmenting suppliers, committing suppliers, assessing their CSR performance and managing corrective actions.

The inclusion of a "sustainable development" and an "anti-corruption" provision in the Group's supply and service contracts in 2018 also constitutes an additional leverage for action. These provisions impose the promotion and respect of fundamental, economic, social, and environmental rights on suppliers. Eventually, the Group supplemented these actions with a targeted awareness campaign for its buyers following the publication of the new version of the Veolia Suppliers' Charter in 2019, a document in which the Group's expectations are formalised in view of the issues raised by the duty of vigilance law.

The Group Purchasing Department rolled out in 2019 an e-learning certification, updated in 2021, for all its buyers and purchasing managers as well as for the BU and Group compliance function.

The importance of taking into account issues linked to sustainable development, these being very close to the themes covered by the duty of vigilance law, is recalled during this training course.

Regarding supplier evaluations described in paragraph 5.3:

- A: in case of an overall score in line with Veolia's expectations, the supplier must be reassessed every three years;
- B: in the event of an overall score that does not meet Veolia's expectations, the buyer must work with the supplier to identify and implement corrective actions. The supplier must be reassessed the following year and demonstrate improved performance.

If a supplier's score is not compliant and is below a certain threshold for three consecutive years, the supplier will be delisted until a compliant score is achieved.

Since the second quarter of 2019, in order to complete its monitoring system and within the framework of the duty of vigilance law, the Group implemented an in-house site inspection report solution (available in ten languages), organised around the main issues relating to health and safety, environment, and human rights. Should a non-conformity be detected, buyers must agree a corrective action plan to be implemented with the supplier.

PLASTIC RECYCLING AND THE INFORMAL SECTOR

Veolia's strategy of developing plastic recycling in a number of middle-income countries has led the company to manage material flows from informal collection.

In order to improve the working conditions of the informal sector plastic pickers, Veolia implements support programmes aimed at ensuring responsible and inclusive collection. In Indonesia, for example, an initiative has been deployed in partnership with Danone Aqua, the Danone Ecosystem Fund and two local NGOs to structure the value chain and improve existing collection centres to make them more efficient and sustainable. This objective was translated into a series of activities at the collection centres, such as training sessions for informal collectors to develop the skills and infrastructure in place, donations of personal protective equipment and materials, and more generally the improvement of working conditions and health and safety at the sites concerned. The work is based on audits, regular dialogue with the help of partner NGOs, field visits and the formalisation of tools (good practice guide, mapping of actors, etc.). These locally driven developments have a positive impact on suppliers of materials from the informal sector. Based on the lessons learned from this experience, Veolia is working to structure a methodology that can be generalised and transposed to other geographical areas.

These initiatives are reinforced by Veolia's participation in a multi-company working group on inclusive collection within the Business for Inclusive Growth (B4IG). The aim of this working group is to identify best practices for taking social issues into account in the management of plastics recycling and to identify the key success factors and levers for their deployment.

Monitoring subcontractors and temporary employment agencies

In application of the Suppliers' Charter, subcontractors and temporary employment agencies must take measures to guarantee the health, safety and well-being of their employees. Thus, for subcontracted activities, a preliminary risk analysis makes it possible to set out in a contract the prevention measures to be observed by all external workers coming on Veolia's sites, who are regularly audited.

Depending on the specific type of activity performed by Veolia, the regulatory provisions as well as the cultural adaptation approach are integrated into the health and safety management of stakeholders within the Group.

The management of subcontractors working on the sites and on Veolia customer premises is of vital importance in the Group's global health and safety management policy. It is recalled in Veolia's Health and Safety at Work Management standard that each Veolia business unit must have an exhaustive list of its subcontractors and must communicate to them Veolia's health and safety requirements in relation to the subcontracted tasks. A documented risk assessment is carried out jointly by the business unit, the subcontractor and all companies operating in the work area, in order to define common preventive measures. A system for assessing health and safety requirements is introduced and affects the listing and renewal of the subcontracting company. The system provides for the temporary or permanent exclusion of a subcontractor in the event of a serious breach of prevention, health and safety rules. Business units set up a health and safety induction session for employees of subcontractors working on Veolia sites. This training session includes a final test with a minimum threshold to be reached in order to be authorised to work on the site. A manager is identified on each site to supervise subcontractors.

6.6 ASSOCIATED STAKEHOLDERS

As part of the social dialogue in place at Veolia, the duty of vigilance issue is regularly raised at meetings of the Group's France and Europe Committees. In 2020 and 2021, the Covid-19 crisis led to the close involvement of employee representatives in steering the action plan deployed by the Group, with a view to

6.7 SUPPORT OF OPERATIONS

The compliance, sustainable development, and human resource networks ensure effective monitoring of Veolia's human rights issues.

As previously stated in section 5 – Assessment, and depending on circumstances, discussions are organised between the Group's Human Rights Manager and each correspondent of the Group's areas. These talks are an opportunity to review the progress of actions already undertaken, discuss the action plans envisaged, and recall possible difficulties in the operational implementation of duty of vigilance themes in the areas involved. In particular, these meetings contribute to better consideration of the local

The subcontractors inform the Health and Safety Department through "safety alerts" in the event of accidents within Veolia's worldwide scope.

As part of a continuous improvement process, Veolia has been monitoring the work-related accidents of subcontractors in the same way as employees since 2018.

For temporary workers, a system has been set up to monitor accidents that have occurred through annual meetings with the representatives of the temporary employment agencies, in order to define suitable prevention measures, share best practices and assess the performance of these agencies.

A tool for analysing exposure to occupational diseases

All employees benefit from periodic medical monitoring to detect occupational diseases but above all to help prevent them.

In order to complete the tools for identifying accident situations in the workplace, Veolia has designed a tool for analysing exposure to occupational diseases, which is shared with the social partners of the French Group Committee, and made available to all health and safety correspondents. It enables exposure to risk factors to be anticipated in order to define and implement an action plan.

In 2022, 153 employees were recognised with an occupational disease (126 in 2021). However, information on occupational diseases may differ in the way it is calculated due to differences in local practices and regulations. The Group monitors occupational diseases by type of cause, i.e. chemical agents, physical agents, biological agents and infectious or parasitic diseases, diseases of the respiratory system, skin diseases, musculoskeletal disorders, mental or behavioural disorders and occupational cancers.

dealing with the consequences of the pandemic with which Veolia's employees and external stakeholders could be faced. The meetings organised in 2022 provided another opportunity to raise the issue of the duty of vigilance.

specificities of each area/BU within the framework of the Group's global human rights policy.

Environmental issues are monitored by Veolia's Business Support and Performance Department. Health and safety fall within the scope of the Human Resources Department.

Veolia has duty of vigilance implementation guidelines, which were formally approved by the Committee. Focusing on the operational entities, these guidelines formalise and explain the Group's expectations on this matter. They are also a basis on which Veolia's internal audit teams can usefully rely to complete future tasks dedicated to the duty of vigilance.

SUMMONS UNDER THE DUTY OF VIGILANCE LAW

Legal proceedings based on the duty of vigilance law and initiated by four non-governmental organisations (NGOs) are underway before the Paris judicial court, requesting that the Suez Group publishes a new vigilance plan that better takes into account the risks related to its activities in Chile⁽¹⁾.

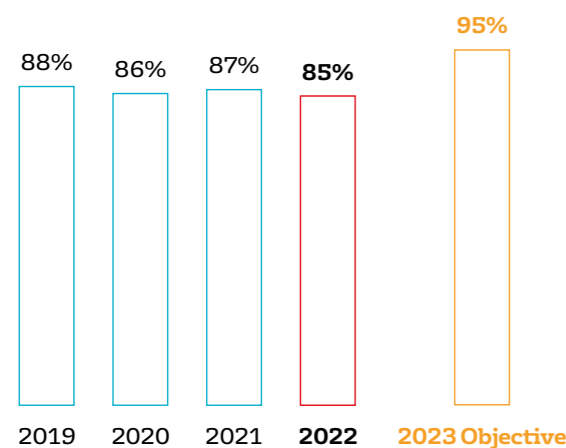
(1) Activities that were taken over by the Group as part of the merger between Suez and Veolia completed in 2022.

KEY PERFORMANCE INDICATORS

8.1 HUMAN RESOURCES

8.1.1 Share of employees⁽¹⁾ covered by a social dialogue committee

Trends in social dialogue committee coverage rate



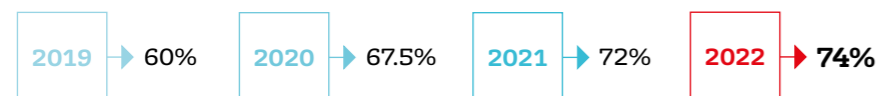
This indicator makes it possible to ascertain the level of deployment of social dialogue agreements within the Group. These agreements are a privileged lever for action to guarantee the respect and implementation of employees' rights.

8.1.2 Typology of agreements signed

% of distribution of categories within the agreements signed worldwide

	2019	2020	2021	2022
Remuneration and employee benefits	32.9%	32.9%	34.6%	36%
Health, safety or working conditions	12.6%	10.2%	10.7%	10.9%
Organisation and working time	27.3%	39%	35.2%	32.9%
Social dialogue	14.0%	6.4%	7%	9.9%
Skills development	5.7%	4.7%	4.8%	4.3%
Other	7.5%	6.8%	7.7%	6%

8.1.3 Share of employees having received at least one health and safety training course over the year

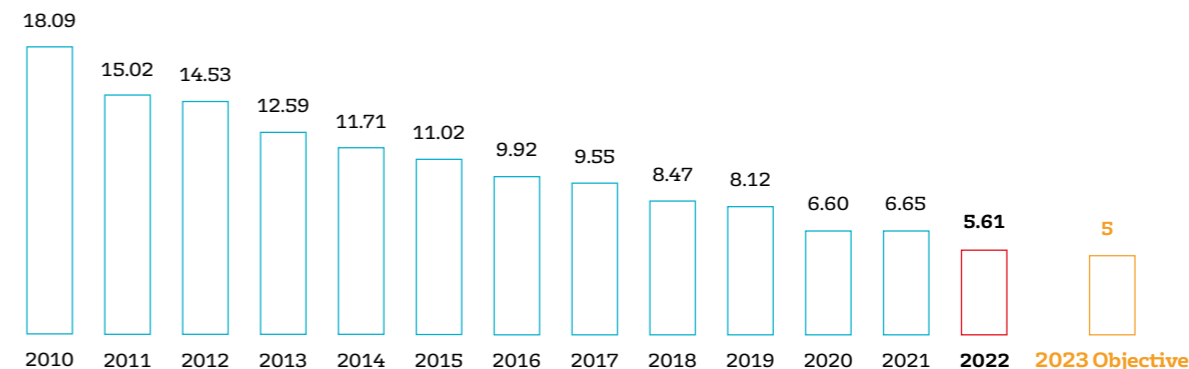


The constant progression of this indicator over the past four financial years highlights Veolia's commitment to guaranteeing a healthy and safe working environment for its employees.

(1) As a reminder, Veolia employed 213,684 people as of 31 December 2022.

8.1.4 Work accident frequency rate

Rate change since 2010



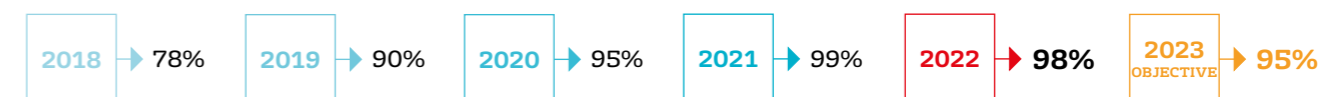
Frequency rate: number of accidents with lost time divided by millions of hours worked.

The work accident frequency rate is a highly revealing indicator of an organisation's health and safety performance. The steady decline in this rate is the result of Veolia's determined and uninterrupted policy in this area.

8.2 ENVIRONMENT

8.2.1 Deployment rate of the Environmental and Industrial Management System

(as % of covered turnover)



The EIMS (see section 6.3) is a key tool for managing Veolia's environmental risks. Monitoring its level of deployment therefore appears relevant and essential. It should be noted that the target for the implementation of the EIMS was achieved two years early.

8.2.2 Additional management systems

The common EIMS base is reinforced locally by additional integrated management system certifications, including the ISO 14001 standard relating to the environment and ISO 9001 relating to quality management. Combined with the EIMS, they

contribute to improving the monitoring of Veolia's environmental risks. In 2022, the drop in coverage is related to the integration of the ex-Suez's BUs.

ISO 14001 certifications (in % of covered turnover)



ISO 9001 certifications (in % of covered turnover)



8.3 TIER 1 SUPPLIERS AND SUBCONTRACTORS

8.3.1 Assessment of strategic suppliers



Assessing strategic suppliers⁽¹⁾ in terms of sustainable development is an essential step in meeting the requirements of the duty of vigilance law.

8.3.2 Sustainable development clause in supply and service agreements

	MONITORING INDICATOR	2018	2019	2020	2021	2022
Commit suppliers	Share of active contracts including sustainable development provisions	63%	71%	76%	88%	93%

The inclusion of this provision in 2018 is a strong lever for action. This provision imposes the promotion and respect of fundamental, economic, social, and environmental rights on suppliers and subcontractors of the Group.

8.4 WHISTLEBLOWING LINE

Alerts relating to the duty of vigilance and reports via the internal system as of 31 December 2022

	2019	2020	2021	2022
Total number of alerts (A)	13	38	35	100
Human rights/discrimination (B)	1	16	1	32
Health and safety (C)	12	18	16	36
Damage to the environment (D)	0	3	1	5
Suppliers and subcontractors (E)	0	1	17	27

NB: the cumulative total B + C + D + E may be greater than A, because some alerts may fall under several categories.

(1) Veolia defines a strategic supplier on the basis of the following cumulative criteria:
 – weight of the expenditure item;
 – significant impact on the Group's energy consumption;
 – supply of products and/or services essential to the Group's operational activity.

Resourcing the world

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