



# Vigilance Plan 2024

March 2025

#missionwater

**Water is the source of all life**, it is the most precious commodity on our planet. This resource is facing immense challenges. These pose a major threat not only to well-being, but also to the very survival of people, cities and ecosystems.

Saur, a player committed to essential water-related services, has been working since its creation to protect this resource in the face of growing environmental and societal challenges.

**Our purpose** is to campaign for all stakeholders (*local authorities, industries, citizens, farmers, associations, civil society as a whole*) to give water the value it deserves. Beyond our primary field of expertise – managing water responsibly, in sufficient quality and quantity – we are committed to taking action and persuading people so that, together, we can invest in saving water and invent new models for preserving our planet's most precious resource.

**This purpose translated into the expression “#missionwater”** represents our commitment and our sustainable business model.

Saur Group is a natural contributor **to the Sustainable Development Goals (SDGs)** set by the United Nations for 2030, with a major impact on SDG 6 "Clean water and sanitation".

This vigilance plan demonstrates Saur's ongoing commitment to act with care, integrity and transparency in all its activities, in a process of continuous improvement.

This plan is drawn up in accordance with the **French law on the duty of vigilance of parent companies and contracting companies**. It details the measures implemented by Saur to identify risks and prevent serious violations of human rights and fundamental freedoms, the health and safety of individuals, and the environment, resulting from its own activities, those of its subsidiaries, suppliers and subcontractors.

Saur's ambition is to **contribute to a sustainable future** by integrating social responsibility issues at the heart of its strategy and operations.

Applicable to all of the Group's activities, this vigilance plan is an essential tool to achieve this objective and to create long-term value for all its stakeholders.

Saur is committed to communicating transparently on the implementation of this plan and its results.

Designed to be a living document, it is regularly updated and improved based on feedback, changes in the context and best practices.



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01

# Group profile, governance and management



## Group Profile

We are a **pure player in the water sector** : it is our business, our expertise and our know-how. Our daily job is to **provide our customers with the water they need, in the right quantity and quality, at a fair price.**

With more than 4,100 drinking water production plants and wastewater treatment plants in nearly 20 countries and industrial solutions available in 140 countries, **Saur's presence is both local and global.** Our **12,000 employees** generate a turnover of more than **€2.3 billion**, in relation to **12,500 suppliers, with 94% of purchases** being made in the country in which they are located.

We are active on **three fronts** : we provide drinking water, we treat wastewater and we develop water management infrastructure, including drinking water plants.

We address **two types of customers** : local authorities and manufacturers.

Our **four divisions** offer an ever-expanding, high-tech, high-impact portfolio that covers **the full range of global water-related challenges** :

### WATER SERVICES

- **Producing and distributing drinking water** to millions of users, while guaranteeing continuity of service.
- **Protect natural resources**, for example by controlling the quality of raw water by ensuring that leaks from pipes are minimised as much as possible.
- **Collecting, treating and recycling wastewater.**

### WATER ENGINEERING

- **Engineering and design of projects** across the entire water cycle, from production, treatment and transport to commissioning of facilities.
- **Intelligent technologies** for refining treatment, sludge management and recovery, analysis and control of environmental impact, as well as research and development of treatment and recycling processes.
- **Consulting, specialist services and project management**, e.g. in the context of studies and diagnostics, research and preparation of financing applications, training of future operators.

### INDUSTRIAL WATER SOLUTIONS

- **Systems integration and facility construction, operation and maintenance** for industries around the world.
- **Optimizing the water cycle** by helping our customers reduce their environmental impact, water and energy consumption, optimize their overall costs, and fully comply with today's increasingly stringent environmental regulations.
- **Effluent treatment.**

### SAUR SERVICES

- **Development of innovative services** related to water and its recovery.



## Our CSR approach

The year 2024 allowed us to **rethink our sustainability roadmap**, in order to align the entire Group with sustainable development objectives in line with our challenges as confirmed by our double materiality analysis.

In the space of five years, Saur has profoundly broadened its scope of action to establish itself as a key player in the global water transition. The Group has been able to combine strategic vision, targeted acquisitions and technological innovations to meet climate and environmental challenges, while intensifying its commitment to water conservation on a global scale.

From a long-standing leader in the small water cycle (domestic management, distribution and treatment) to an innovative and exclusive player in the large water cycle, Saur has redefined its approach. This transformation is based on a radical paradigm shift, which goes beyond the management of water as a simple local resource to integrate it into a global and sustainable model. Today, Saur acts on the entire water cycle, from the tap to the oceans, to ensure the preservation and sustainability of the planet's most precious resource.

The objective? To be a key player in climate change adaptation by responding to the urgent challenges of water scarcity, increasing pressures on water quality, and integrated water resources management on a global scale.

This is reflected in the **new CSR roadmap for 2025-2030, which is based on three pillars** and serves as the starting point for the strategic roadmap for 2030.



### **Our foundation (putting our employees and customers at the heart of change):**

Our employees are the first agents to protect water resources. To carry out their mission, they must be able to operate in a safe and healthy environment. Our industrial customers and local authorities are now suffering the consequences of global warming. Taking care of our relationship of trust is essential to co-construct new water economic models together.



### **Our solutions (recognizing that resources are limited but circular):**

Global warming makes the interdependencies between the large and small water cycle ever more significant, such as floods which have consequences on wastewater treatment. Saur wants to take full advantage of these interdependencies and have an impact on all water-related ecosystems. In addition, Saur wants to actively contribute to the fight against climate change by reducing its CO2 emissions and taking into account the specificities of the water sector, in particular by relying on the dynamics of the territory in which our municipal customers are involved and on the circular economy.



### **Our responsibility (adopting shared and ethical governance):**

The development of ethical and responsible corporate governance remains a priority for our Group in a context of strong growth. To complement these foundations, we want to strengthen value sharing with our employees, increase diversity in top management, maintain a transparent dialogue with our shareholders and integrate the protection of human rights throughout our value chain.

**Indicators are associated with each pillar** in order to monitor the progress of our action plans.

## Governance

Executive Chairman **Patrick Bléthon** oversees all of Saur Group's sustainability activities.

The CSR team is responsible for integrating sustainable development into the Group's activities on a daily basis.

- **Marie Francolin**, Senior Executive VP Strategy, Sustainable Development, Innovation and Services, is responsible for defining and executing the CSR strategy.
- **Bénédicte Peyrol**, Group Director of Sustainable Development and Public Affairs, has operational responsibility for CSR management.

Together, the CSR team is in charge of deploying the CSR commitments of Saur, in coordination with all the members of the General Management Committee.

The CSR Department is composed of CSR managers in the entities Saur International and Nijhuis Saur Industries. As members of the **"Global CSR Team"**, they participated in the development of this vigilance plan and naturally contribute to the implementation and monitoring of the actions.

The **Saur Duty of Vigilance Steering Committee (referred to as "COFIL" or "Committee")** is a body set up within the Group to ensure the integration and monitoring of issues related to human rights, the environment and other ESG risks for all the activities of the Group and its subsidiaries.

The Committee's main objective is to ensure that the Group's commitments on risks relating to human rights, human health and safety and the environment are respected and continuously improved. It ensures the implementation and monitoring of Saur's Vigilance Plan as well as its Human Rights and Fundamental Freedoms Policy.

The **Committee's missions** are:

- **Regular review of the risk mapping** related to due diligence issues across the Group's activities and value chain
- **Monitoring of corrective and preventive actions put in place** to reduce these risks
- Analysis of **regulatory changes and the expectations of stakeholders** (NGOs, investors, regulators, customers and consumers, etc.)
- Validation **and monitoring of related performance indicators and action plans**
- **Reviewing internal and external reports related to human rights and environmental abuses**

## Governance

The Committee brings together the functions of the Group with a strategic role in the identification, management and mitigation of human rights risks, in particular. These functions are:



### Saur's Duty of Vigilance Steering Committee

- **CSR Department** (Responsible for Duty of Care and Chair of the Committee): Leads the Group's CSR roadmap, supervises human rights commitments and leads the Committee's strategic discussions.
- **Human Resources Department:** Ensures that employee and worker rights are respected across sites and subsidiaries; and follows practices in terms of working conditions, diversity and inclusion.
- **Purchasing & Supply Chain Department:** Responsible for the evaluation of suppliers and subcontractors with regard to CSR criteria.
- **General Secretariat - Legal, Ethics & Compliance Department:** Ensures the Group's compliance with local and international regulations on human rights and environmental issues.
- **Communication Department:** Leads the internal and external communication strategy in order to strengthen the brand image, support business objectives and ensure the consistency of messages on a national and international scale.





- **Operations Department - Quality, Health & Safety** : Ensures compliance with safety and health standards for employees and local communities impacted by the Group's activities. It implements measures to prevent occupational and health risks, particularly in production and operating sites, and contributes to the continuous improvement of quality standards for water management services and infrastructure. It is responsible for implementing measures to mitigate environmental impacts.

The COPIL meets at least once a year to draw up an overall assessment of the issues and actions related to the Duty of Vigilance within the Group's activities.

A summary of the decisions and recommendations is circulated to the members of the Committee and the concerned departments after the meeting. This annual meeting format ensures a structured and strategic approach, while allowing operational teams to focus on implementing initiatives throughout the year.

It reports once a year to the General Management Committee and the ESG Steering Committee.

## Stakeholder consultation

In 2024, we wanted **to involve a large number of stakeholders**, both internally and externally, in our approach.



**Within the Group**, we conducted **interviews with about thirty people** representing all of the Group's entities and businesses. These interviews allowed us to identify concrete issues related to the duty of vigilance but above all the actions taken to respond to them.



**Mobilizing all our stakeholders** is at the heart of our CSR approach. On the occasion of its 90th anniversary, Saur conducted a **citizen consultation** in collaboration with the Make.org organization: **#ChaqueGoutteCompte** : *What are your ideas for preserving our water resources?*

This unprecedented approach, in line with our Purpose, mobilized **16,000** participants from all regions of France to gather their ideas and proposals on concrete solutions to better manage and preserve this essential resource.

More than **1,600 proposals** were submitted, around **5 themes** :

- Water Infrastructure and Management
- Policies and Regulations
- Agricultural Practices
- Domestic and daily consumption
- Environmental protection and biodiversity

This initiative made it possible to combine technical knowledge and concrete experience, to **bring out solutions adapted to the challenges of sustainable water management**. By actively involving society, we reaffirm our commitment to raising awareness, co-constructing and acting to preserve this essential resource for future generations.

Nearly **300,000 people voted** on the proposals. **In September 2024, collaborative workshops were held to deepen the proposals which were popular among online voters**. They brought together citizens and experts to find practical solutions, adapted to both water issues and the needs of users. Participants explored ways to optimize the use of resources, improve existing systems, and address immediate challenges. These exchanges brought out concrete ideas and helped to consolidate solutions already in development for a more sustainable water management accessible to all.

## Double materiality analysis

In 2024, Saur carried out a **double materiality analysis** covering all of the Group's businesses, geographies and stakeholders with a **4-step methodology**:

### 1. Identifying our specific challenges

Based on the text of the Corporate Sustainability Reporting Directive (CSRD), for example, 10 environmental, social and governance themes that can be applied to all companies have been identified. Saur-specific issues have also been integrated into the double materiality analysis.

Saur's sustainability team has carried out a benchmark of its main peers. It also analysed the issues defined by international standards in the field of water. The various elements studied made it possible to identify four additional challenges specific to Saur: Social Pricing, Open Data, GDPR, Cybersecurity.

### 2. Interviewing our stakeholders

Saur then identified a panel of internal and external stakeholders, who were questioned, using an online questionnaire, on the impacts, risks and opportunities of the 14 environmental, social and governance themes, which are likely to be material for Saur. Respondents were also asked to rate the materiality (importance) of these issues on a scale from 1 = NOT IMPORTANT to 4 = VERY IMPORTANT. At the same time, interviews were conducted to collect qualitative information.

### 3. Analyze these interviews

For the analysis of the online questionnaires, averages of the responses for each question were taken in order to rank the issues according to their importance to stakeholders.

An average materiality score was obtained for each issue and sub-issue evaluated. For each sub-issue assessed, the average materiality score was used to rate the issue in the rating file. When justifications were provided, they were reused to justify whether the materiality is financial and/or impactful, positive and/or negative.

### 4. Prioritizing our challenges

The criteria used to score the materiality of impact of issues are: Severity (the significance of the impact), scope (magnitude of impact), irremediability, and likelihood.

For financial materiality, magnitude and probability are the two criteria used. Once the rating was finalized, double materiality matrices were automatically generated by the tool set up to collect all the results from the analyses.

More details on Saur's Dual Materiality Analysis can be found in the [Group's 2024 CSR Report](#).

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# Risk mapping and assessment



In accordance with the law, this risk mapping aims to identify risks in terms of human rights and fundamental freedoms, the health and safety of individuals and the environment, with the most serious consequences or impacts, which may result directly from Saur's activities or from the suppliers and subcontractors with whom Saur has an established business relationship.

This approach anticipates the requirements by relying on the reference frameworks of Directive 2024/1760 of the European Parliament and of the Council of 13 June 2024 on corporate sustainability due diligence ("CS3D").

Risk mapping is carried out in **two main steps** :

- a first identification stage, which aims to identify as exhaustively as possible the risks that the Group poses to the environment and to its stakeholders;
- a second stage of assessing and prioritizing these risks with regard to the probability of occurrence and the severity of the potential impacts.



## Objectives

The risk mapping process, defined and led by the Group's CSR Department, aims to provide the management of the Group and its entities (subsidiaries, countries) with an objective and as exhaustive a global vision of the issues as possible.

The realization of this risk mapping aims to:

- Identify and prioritize all risks by taking into account aggravating factors as well as existing means of control,
- Share a structured approach and a prioritized vision of risks with the internal functions concerned,
- Identify the third parties with whom the Group is in a relationship with a categorization according to their involvement in the most critical risk situations in order to adapt the third-party assessment system,
- Identify the functions and employees most exposed to risks in order to develop and deploy an appropriate awareness and training system in order to strengthen the culture of vigilance,
- Formalize and implement action plans in order to effectively manage risks by identifying the prevention, detection and remediation measures and procedures to be put in place, focusing on the most at-risk situations as a priority, with an optimal allocation of responsibilities and resources



## Perimeter

The mapping covers all managerial, operational and support processes for the 4 business units : Water Services, Industrial Water Solutions, Water Engineering and Saur Services. The mapping was carried out according to the specificities of the Group and each subsidiary (in France and abroad), taking into account the different activities, the different businesses, and all the geographical areas.

This mapping focuses on the risks induced by:

- the activities of the Group and all its entities
- the activities of subcontractors and suppliers





## Terms of Reference

In the context of the mapping of risks in terms of human rights, the environment and the health and safety of people, our **risk framework** takes into account **several recognized reference frameworks**, in an extended approach as defined by the CS3D.

From a **methodological point of view**, we have also relied on publications from recognized organizations and institutions, particularly for the assessment of risks related to Human Rights.

This work is also based on the exploitation and analysis of several **reports** and **sources of information specific to our activities as well as on the use of tools**.

All the elements are detailed in [Part 6 / Reference frameworks and sources of information](#).



## Risk identification

The identification of risks is based on the collection and analysis of detailed information, structured around various collection methods, in order to build an exhaustive view of the risks in the different dimensions covered by the Vigilance Plan.

Saur's **risk reference framework** for due diligence has been compiled from a cross-referencing of several sources of information:

1. **Research and documentary analyses** : Review of the contextual elements, trends and reference frameworks to be taken into account at the level of the 3 themes (Human Rights, Environment, Health and Safety) as well as more broadly at the level of Saur's business sectors in terms of sustainability. Research was also carried out to identify the main incidents and controversies concerning Saur's human rights and environmental sectors.

Work was carried out to identify "known public cases" in order to ensure that situations that had already been encountered in the Group's sectors of activity and/or within the various functions were properly taken into account.

Searches were conducted from online search engines in different languages based on controversial keywords ("pollution", "human rights", "accident", "harm", etc.) associated with keywords from the sectors ("Drinking water", "Sanitation", "Engineering", "Pipes", etc.) and the names of competitors and players in the sectors in France and abroad.

2. **Conducting interviews within the Group**: Approximately thirty interviews were held with function managers, operational staff and experts chosen for their good knowledge of the Group, a good knowledge of the roles and responsibilities assigned and a detailed mastery of the processes implemented.

These interviews made it possible to identify several situations that the Group has been or could be confronted with, as well as the preventive actions and measures to limit the probability of occurrence or the seriousness of the risks in the event of an occurrence.

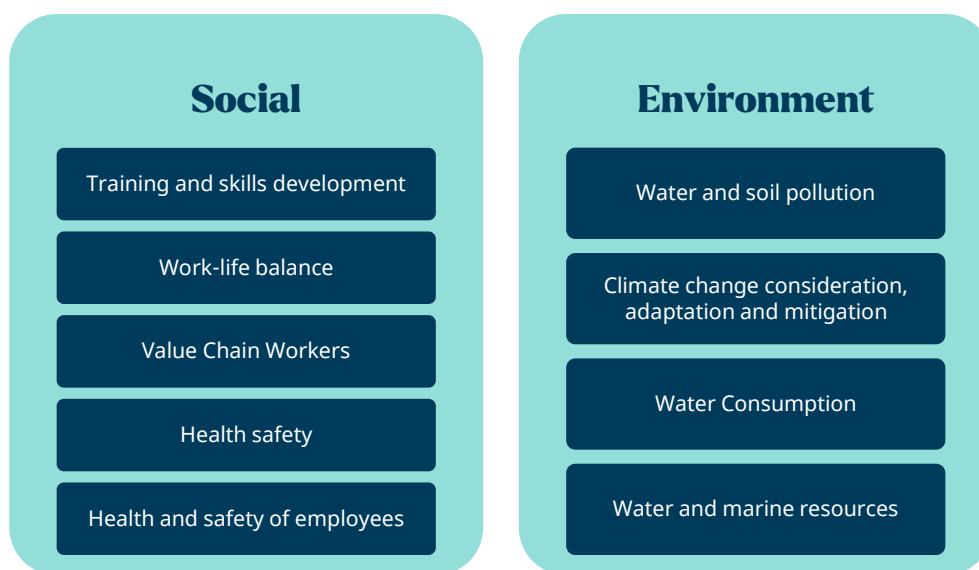
The conduct of these interviews also made it possible to strengthen the level of knowledge and awareness of the issues of the various interlocutors in the context of the development of a common culture of vigilance.



3. **Support for the other assessments made by the Group** : Particular attention has been paid to consistency with other risk mapping approaches, in particular the Group's **major risk mapping**, led by the Group's Ethics & Compliance, Risks & Insurance Department, which takes into account several risks related to the duty of vigilance:

- Natural disasters and climate change
- Pandemics and Health Crises
- Quantity and quality of water resources
- Site operation and environmental preservation
- Supply chain control
- HR management, performance and attractiveness
- Health and safety of employees

We also took into account the work and results of **the double materiality analysis**. During the many interviews conducted on this subject, several subjects related to the duty of care were discussed, in particular:



The development of the risk mapping related to duty of vigilance is also based on several existing mechanisms within the Group:

- **Supplier risk analysis** carried out by the Purchasing Department. Each year, the "critical" suppliers are evaluated, particularly on CSR dimensions. The scope currently covered is that of the Water Services France activity (which represents 53% of turnover and 68% of employees), Cise TP, Stereau France and Industrial Water Solutions France. These critical suppliers/subcontractors are identified on the basis of their turnover and their purchasing category.
- **Risk analysis carried out within the framework of ISO 45001 and 14001 standards** by the HSE and Quality Departments. Each year, Environmental and Health and Safety and Occupational risks are assessed as part of the renewal of ISO 14 001 and 45 001 certifications. The scope currently covered is mainly that of the Water Services France activity.




## Risk Repository


A **reference framework of 22 risks** has been created around the 3 main themes:

- Human Rights and Fundamental Freedoms (11 risks)
- Environment (7 risks)
- Health and safety of individuals – in a broader approach than the health and safety of workers (4 risks)


Each identified risk has been defined and linked to a recognized reference framework.




A **risk register** has been set up to qualify all the risks in the framework with regard to the Group's challenges:

| Risks  | Description  | Reference Frameworks   |
|--|--|--|
|  <b>HUMAN RIGHTS AND FUNDAMENTAL FREEDOMS</b> |  |  |
| <b>ATTACK ON LIFE</b> by public/private security forces  | Linked to the intervention of public or private security forces that may cause harm to life or physical integrity due to lack of control, supervision or instruction | <ul style="list-style-type: none"> <li>• Universal Declaration of Human Rights</li> <li>• International Covenant on Civil and Political Rights</li> <li>• Voluntary Principles on Security and Human Rights</li> </ul>     |
| <b>MODERN SLAVERY</b> : Forced Labour, and Human Trafficking   | Forced labour under threat and without consent, including human trafficking and forced labour through withholding of wages or other forms of coercion                | <ul style="list-style-type: none"> <li>• ILO Convention No. 29 on Forced Labour (1930)</li> </ul>  |
| <b>CHILD LABOUR</b>  | Child labour, including in hazardous conditions and contrary to international conventions, including within the value chain  | <ul style="list-style-type: none"> <li>• Convention on the Rights of the Child</li> <li>• ILO Minimum Age Convention No. 138 (1973)</li> <li>• ILO Convention No. 182 on the Worst Forms of Child Labour (1999)</li> </ul> |
| <b>ILLEGAL WORK AND NON-COMPLIANCE WITH LABOUR LAWS</b>  | Concealed, undeclared or non-compliant employment, including the presence of undocumented or irregular workers   | <ul style="list-style-type: none"> <li>• National legislations</li> <li>• OECD Guidelines for Multinational Enterprises (1976, revised 2011)</li> <li>• ILO Convention No. 81 on Labour Inspection</li> </ul>              |

| Risks  | Description  | Reference Frameworks  |
|--|--|---|
|  <b>HUMAN RIGHTS AND FUNDAMENTAL FREEDOMS (continued)</b> |  |   |
| <b>DISCRIMINATION AND UNEQUAL TREATMENT</b>  | Any distinction based on race, gender, sexual orientation, origin, disability or other criteria, affecting equal treatment or opportunity for employees and employees in the value chain | <ul style="list-style-type: none"> <li>• ILO Equal Remuneration Convention (1951) (No. 100)</li> <li>• ILO Convention No. 111 concerning Discrimination (Employment and Occupation) (1958)</li> <li>• International Covenant on Economic, Social and Cultural Rights</li> </ul> |
| <b>BREACH OF PRIVACY AND PERSONAL DATA</b>   | Failure to respect privacy in the workplace or accommodation. Improper collection or use of personal data, failure to secure data  | <ul style="list-style-type: none"> <li>• Article 17 of the International Covenant on Civil and Political Rights (ICCPR)</li> <li>• GDPR</li> </ul>  |
| Non-payment of <b>LIVING WAGE</b>  | Failure to comply with minimum wage, non-payment of overtime, or insufficient wages to cover basic needs   | ILO Minimum Wages Convention No. 131 (1970)   |
| Failure to respect the principles of <b>FREEDOM OF ASSOCIATION, SOCIAL DIALOGUE AND COLLECTIVE BARGAINING</b>                              | Hindrance to the creation of workers' associations, collective bargaining and trade union activities more generally  | <ul style="list-style-type: none"> <li>• ILO Convention No. 87 on Freedom of Association and Protection of the Right to Organise (1948)</li> <li>• ILO Convention No. 98 on the Right to Organise and Collective Bargaining (1949)</li> </ul>                                   |
| <b>LACK OF EQUITABLE ACCESS TO RESOURCES / NON-RESPECT of the RIGHT TO WATER</b>   | Failure to preserve the right to access water, especially in areas of water stress   | <ul style="list-style-type: none"> <li>• UN General Assembly resolution 64/292 "The human right to water and sanitation"</li> <li>• Sustainable Development Goal (SDG) n°6 of the United Nations 2030 Agenda</li> </ul>   |
| <b>FAILURE TO RESPECT THE RIGHTS OF LOCAL COMMUNITIES AND INDIGENOUS PEOPLE</b>  | Exploitation of resources or disruption of customs and traditions without respecting the rights of indigenous peoples or local communities   | United Nations Declaration on the Rights of Indigenous Peoples  |
| <b>INABILITY TO EXERCISE RIGHTS</b> or access COMPLAINT RESOLUTION MECHANISMS  | Lack of effective mechanisms for individuals, including local communities, to exercise their rights or lodge complaints  | United Nations Guiding Principles on Business and Human Rights  |



| Risks  | Description   | Reference Frameworks  |
|--|---|---|
|  <b>ENVIRONMENT</b> |   |   |
| <b>CONTRIBUTION TO CLIMATE CHANGE</b><br>through<br>greenhouse gas<br>(GHG) emissions                | Direct and indirect greenhouse gas (GHG) emissions in the value chain, contributing to global warming   | <ul style="list-style-type: none"> <li>• Paris Agreement of the United Nations Climate Change Conference (2015)</li> <li>• Montreal Protocol on Substances that Deplete the Ozone Layer</li> <li>• Vienna Convention for the Protection of the Ozone Layer</li> </ul>   |
| <b>UNCONTROLLED CONSUMPTION OF WATER RESOURCES</b>   | Inability to control water consumption/abstraction and management, particularly in water-stressed areas   | <ul style="list-style-type: none"> <li>• Sustainable Development Goal (SDG) n°6 of the United Nations 2030 Agenda</li> <li>• United Nations Convention on the Protection and Use of Transboundary Watercourses and International Lakes (1992)</li> </ul>                |
| <b>DEFORESTATION</b>   | Exploitation of natural resources, including for agriculture or the extraction of raw materials, leading to the destruction of forests                                      | Regulation (EU) 2023/1115 on the making available on the Union market and on the export from the Union of certain commodities and products associated with deforestation and forest degradation   |
| <b>NEGATIVE IMPACTS ON BIODIVERSITY AND ECOSYSTEMS</b>   | Destruction of natural habitats, loss of biodiversity and disruption of ecosystems due to the company's activities, including industrial activities, including desalination | <ul style="list-style-type: none"> <li>• 1992 Convention on Biological Diversity</li> <li>• Cartagena Protocol</li> <li>• Nagoya Protocol</li> <li>• Studies of the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES)</li> </ul> |
| <b>NON-RESPECT FOR ANIMAL WELFARE</b>  | Breeding, transport and slaughter conditions that do not respect the 5 fundamental freedoms for animals   | Fundamental principle of the 5 individual freedoms for animal welfare, from the World Organisation for Animal Health  |
| <b>DEFICIENCIES IN WASTE MANAGEMENT</b>  | Inadequate waste management along the value chain, which can lead to pollution, negative environmental impacts and non-compliant, intentional or accidental waste deposits  | <ul style="list-style-type: none"> <li>• Basel Convention</li> <li>• Regulation (EC) No 1013/2006 of the European Parliament and of the Council of 14 June 2006 on shipments of waste</li> <li>• Minamata Convention on Mercury</li> </ul>                              |

| Risks  | Description  | Reference Frameworks   |
|--|--|--|
|  <b>ENVIRONMENT (continued)</b>   |  |  |
| <b>WATER, SOIL AND AIR POLLUTION</b>   | Contamination of water, soil, and air by chemicals, pollutants, and microplastics, including the risk of discharges of non-compliant or inadequately treated effluents into natural waters and toxic and undesirable substance residues (PFAS) | <ul style="list-style-type: none"> <li>• Minamata Convention on Mercury</li> <li>• Stockholm Convention of 22 May 2001 on Persistent Organic Pollutants</li> <li>• Regulation (EU) 2019/1021 of the European Parliament and of the Council on persistent organic pollutants</li> <li>• Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides</li> <li>• United Nations Convention on the Law of the Sea</li> </ul> |
|  <b>HEALTH AND SAFETY OF INDIVIDUALS</b>  |  |  |
| <b>UNSUITABLE WORKING CONDITIONS :</b><br>Working rhythm and time, working environment   | Exposure of workers to unsuitable working conditions, including excessive paces, stressful or ill-adapted environments, and physically demanding tasks   | ILO Convention No. 1 on Hours of Work  |
| <b>WORKERS' EXPOSURE TO HEALTH AND SAFETY RISKS</b>  | Risks of accidents, occupational diseases and exposure to hazardous substances (including chemicals and asbestos), with insufficient safety measures   | <ul style="list-style-type: none"> <li>• ILO Convention No. 155 on Occupational Safety and Health</li> <li>• ILO Recommendation No. 164 on Occupational Safety and Health</li> </ul>   |
| <b>WORKPLACE VIOLENCE AND HARASSMENT</b>   | Physical or psychological violence, harassment, or degraded working conditions affecting employees, including psychological impacts such as mental stress and unhappiness  | ILO Convention No. 190 on Violence and Harassment,   |
| <b>EXPOSURE OF LOCAL COMMUNITIES AND CONSUMERS TO HEALTH RISKS</b>   | Risks related to industrial activities affecting the health of communities or customers (non-compliant products, toxic residues, discharges of untreated effluent) as well as environmental disturbances such as noise and odours              | <ul style="list-style-type: none"> <li>• National legislation</li> <li>• World Health Organization Guidelines and Planning for Water Safety and Drinking Water Quality</li> </ul>  |



## Risk assessment

The risks identified were assessed taking into account their probability of occurrence and their severity in the event of an occurrence.

- The **probability of occurrence** is assessed, taking into account empirical data such as the frequency of past incidents (*involving the Group or a competitor*), the operational and geographical context, and the control measures in place.
- The **severity** of a risk is measured in terms of the **potential consequences** of the possible damage, but also the duration and irreversibility of these impacts, as well as the financial, social and environmental consequences.

The analysis of these two criteria is complemented by **regular monitoring** (e.g. publications, reports, news) to take into account any aggravating factors likely to increase risks in certain countries or sectors of activity. Our risk assessment is based on 10 vital rules: 5 business risks and 5 behavioral risks, detailed below.

**The risk assessment** was validated by a panel of internal contributors at the level of the **Group's various activities and corporate functions**, with **differentiation depending on the place in the value chain**:

- Direct **Activity Risks**
- Upstream risks (activities of suppliers and subcontractors)
- Downstream risks (client activities)

The assessment was made on **a scale of 1 to 5 depending on the exposure**:

| Level | Intensity of risk | Description   |
|-------|-------------------|---|
| 0     | No link           | The activity has no identifiable link to this risk. No impact or exposure is expected, even indirectly.   |
| 1     | Weak              | The activity has minimal association with this risk. The risk exists but with a low probability or impact, which requires only follow-up actions or limited actions.  |
| 2     | Average           | The risk is moderately relevant to this activity, with a non-negligible probability of occurrence or potential impacts that require regular prevention or control measures.                                       |
| 3     | Strong            | The risk is significant for this activity, with a high probability of impact or significant consequences. Active management and reinforced preventive actions are necessary.                                      |
| 4     | Critical          | The activity is particularly exposed to this risk, with potentially serious, regular, or widely documented impacts. This level requires constant vigilance, with priority and systematic risk reduction measures. |





Country Risk Assessment

Beyond the various risks identified in the risk framework, we felt it was important to develop an approach based on the risks associated with our countries of establishment and operations.

The assessment of country risks in terms of due diligence is based on the **cross-referencing of 2 factors**:

- **Saur’s activities in the country** is assessed on the basis of several factors: nature of the relationship with the country (subsidiary, office, etc.), volumes of purchases and sales, number of employees, number of third parties with whom the Group has a relationship, etc.
- **Saur's exposure to risks in the country** based on a "**Vigilance Index**" made up of indicators from recognized institutions, in connection with the 3 risk themes identified.

A **database** covering 190 countries and territories has been set up, making it possible to gather, consolidate and cross-reference all the information concerning Saur's commitment and the Vigilance Index.

This approach makes it possible to highlight the countries most exposed in terms of risks and the nature of interactions.

As part of this analysis, we have identified a large number of indicators that can be used to qualify risks from different perspectives, from which we have selected 12.

The Vigilance Index is therefore based on the **following indicators** :

| Thematic                    | Spring           | Indicators   |
|-----------------------------|------------------|--|
| Human Rights                | WALK FREE        | Estimated prevalence of modern slavery per 1,000 population                                    |
|                             | UNICEF           | Percentage of children 5–17 years old involved in child labour at the moment of the survey     |
|                             | ONE              | Gender Development Index (GDI)   |
|                             | ILO              | In-work poverty rate (percentage of employed people living on less than USD 2.15 in PPP)       |
|                             | WHO/UNICEF       | Proportion of population using safely managed improved water supplies                          |
| Environment                 | World Bank / IEA | CO2 emissions (metric tons per capita)   |
|                             | UNEP-WCMC        | Percentage of the national territory classified as protected areas (biodiversity)              |
|                             | World Bank       | Renewable inland freshwater resources per capita (cubic metres)                                |
| Health and safety of people | ITUC-ISC         | ITUC Workers' Rights Index   |
|                             | ILO              | Proportion (%) of population employed covered by social protection in the event of work injury |
|                             | ILO              | MDG Indicator 8.8.1 - Non-fatal occupational injuries per 100,000 workers                      |
|                             | ILO              | MDG Indicator 8.8.1 - Fatal occupational injuries per 100,000 workers                          |

For each indicator, we have segmented all countries into 4 levels based on defined thresholds to determine a score per theme and an overall score constituting the Vigilance Index.



## Risk prioritization and monitoring

Regardless of the value chain, the **top 10 risks identified in the mapping (not prioritized below)** are:

- ☐ Discrimination and unequal treatment
- ☐ Violation of privacy and personal data
- ☐ Lack of equitable access to resources / non-respect of the right to water
- ☐ Contribution to climate change through greenhouse gas (GHG) emissions
- ☐ Uncontrolled consumption of water resources
- ☐ Negative impacts on biodiversity and ecosystems
- ☐ Water, soil and air pollution
- ☐ Inadequate working conditions
- ☐ Exposure of workers to health and safety hazards
- ☐ Exposure of local communities and consumers to health risks

**Each risk has been presented in the form of a sheet** containing all the elements: detailed presentation of the risk, exposure of the Group's various activities, potential illustrative scenarios, the group's system and action plan. An example is shown below:

**Cartographie des risques**

**ESCLAVAGE MODERNE : travail forcé, et traite des êtres humains**

**L'esclavage moderne est un terme générique qui recouvre le travail forcé et la traite des êtres humains.** La traite des êtres humains implique le recrutement, le transport, le transfert, le recel et/ou l'accueil d'une personne. Les victimes sont contraintes de travailler gratuitement ou avec un salaire inadéquat, en vivant dans la crainte de la violence, souvent dans des conditions inhumaines.

La Convention (n°29) de 1948 sur le travail forcé définit le **travail forcé** comme « **tout travail ou service exigé d'un individu sous la menace d'une peine quelconque et pour lequel ledit individu ne s'est pas offert de plein gré** ».

Plusieurs éléments permettent d'établir si une situation relève du travail forcé :

- **Restrictions à la liberté de mouvement** des travailleurs sur le lieu de travail ou dans le centre d'hébergement sans qu'il ne soit possible de quitter le travail
- **Confiscation ou non paiement des salaires** ou déductions salariales sans autorisation ou à l'insu de l'employé.
- **Dettes imposées** de manière frauduleuse, servitude pour dettes
- **Confiscation des documents** d'identité, des titres de voyage et/ou d'autres documents de l'employé.
- **Violences physiques ou sexuelles**
- **Menaces (signalement aux autorités)**, intimidations et abus de pouvoirs
- **Pratiques de recrutement frauduleuses** (fausses publicités et/ou faux contrats) ou coercitives

**Certaines personnes sont plus vulnérables :** un statut d'immigration instable (migrants, sans papiers), des barrières linguistiques, la pauvreté et le manque de besoins fondamentaux, les effets psychologiques d'un traumatisme récent ou passé, l'absence de systèmes de soutien social et des handicaps physiques ou de développement.

| Exposition des activités     | Direct | Amont | Aval |
|------------------------------|--------|-------|------|
| Water Services France        | 1      | 2     | 0    |
| Water Services International | 2      | 3     | 0    |
| Industrial Water Solutions   | 1      | 2     | 1    |
| Water Engineering Services   | 1      | 2     | 0    |
| Fonctions Corporate          | 1      | 2     | -    |

**Exemples de potentiels scénario :**

- Fonctions Corporate : Les syndicats de la Saur dénoncent le contrat avec Accenture et le centre d'appel basé à l'Ile Maurice.
- IWS: Un fournisseur de membranes pour le traitement de l'eau est identifié comme employant des travailleurs sous contrainte dans ses usines en Chine.

**Dispositif du groupe et plan d'actions**

- **Code de conduite, et mécanisme d'alerte** ouvert à toutes les parties prenantes
- Critères relatifs aux droits de l'homme dans l'**auto-évaluation de l'audit interne** pour toutes les entités
- Modern Slavery Act NSI UK ?

6 #missionwater
Document interne - Confidentiel

The comparison between Saur's commitment in the country and the Vigilance Index in a matrix makes it possible to highlight the countries that require special attention in the implementation of our duty of vigilance. This leads to the implementation of appropriate measures. Each action system to be adopted during an activity in a country at risk will also be presented in the form of a sheet and will be the subject of awareness-raising and training courses.



## Update

This risk map will be monitored and updated in the event of a major change in scope or activity, and at least every 5 years.

# Regular evaluation of entities, suppliers and subcontractors



## Entity evaluation

**Saur Group's internal control system** is designed to ensure the compliance of internal operations and procedures, as well as the reliability and quality of information.

This system has three lines of control:

- The controls exercised by each employee, according to the responsibilities that have been explicitly delegated to him/her, the procedures applicable to the activity he/she carries out and the instructions communicated, and steered by management,
- The various functions instituted by management to ensure the monitoring of risk control and compliance,
- Independent assurance provided by the internal audit or external stakeholders (auditors, certifying bodies, etc.)

All activities, processes, systems and entities of Saur Group fall under the scope of Internal Audit without reservation or exception. The scope of intervention includes all operational, financial, administrative processes as well as corporate governance, risk management and control processes.

**All entities are covered and assessed by the internal control framework.**

The Group has an internal control system in line with the requirements of the COSO 2013 internal control framework. Feedback is made to the Audit Committee and to the Group's management.

Many of the Group's entities are also regularly assessed as part of **ISO certifications** by independent bodies, including:



- ISO 14001 for environmental management,
- ISO 50001 for energy management,
- ISO 45001 for occupational health and safety management,
- ISO 9001 for quality,
- ISO 37001 for anti-bribery management system.

Our internal audit process and external certification audit make it possible to evaluate the company's approach to its risks on an annual basis and to define areas for improvement.

## Evaluation of suppliers and subcontractors

The Purchasing Department has a regular multi-criteria evaluation procedure for suppliers, during the selection phase and during the life of the contract.

Thus, as mentioned on page 16 of the same document, it annually analyzes the risks associated with suppliers and subcontractors determined as **critical** in the France purchasing perimeter (Water Services France, Cise TP, Stereau France and Industrial Water Solutions France), and identifies the control actions to be undertaken. Depending on the rating obtained, the evaluation is done every year or every two years.

### 3 / Regular evaluation of entities, suppliers and subcontractors



Outside of the critical families, all suppliers and subcontractors with more than three anomalies per year must be evaluated. These anomalies, classified according to the cause of the problem (deadline, product/service quality, safety, environment or energy) are reported by the operators.

In 2022, in order to strengthen knowledge of the risks and types of risks associated with its supply chain, Saur Group entered into a partnership with a recognized external service provider, Ecovadis, to assess the CSR risks of the panel of suppliers in the French purchasing scope. The CSR risks associated with each supplier (environment, ethics, human rights and purchasing) were measured using Ecovadis IQ, taking into account their geographical location, their sector of activity, and their criticality to the Group.

→ **57%** of France's purchasing revenue is covered by a CSR risk map, representing more than 8000 suppliers (out of the Group's 12,500 suppliers) from 192 sectors in 32 countries.

This mapping makes it possible to identify the most at-risk suppliers, for whom a CSR performance assessment will gradually be requested.

→ To date, the average score of the suppliers evaluated is 58/100.

The next few years will therefore be dedicated to the deployment of evaluations, and to the proper integration of these into the purchasing decision-making process.

All buyers in France have been made aware of CSR risks in supply chains, with buyer training being a priority area of work.

In addition, in 2024, the Industrial Water Solutions unit, called Nijhuis Saur Industries (referred to as "NSI" or "Nijhuis"), updated its General Conditions of Purchase, requiring its suppliers and subcontractors and their business partners to comply with the ESG standards stipulated by NSI and in line with the requirements of the Group, **including health and safety, environmental protection and human rights**. In particular, suppliers must be part of a process to reduce their carbon footprint through annual objectives and regular monitoring.

NSI also requires compliance with anti-corruption and cybersecurity regulations. Any breach of these obligations or NSI's Code of Conduct may result in the immediate termination of the contract, regardless of the entity with which it is established.

In addition, the Group's suppliers and subcontractors are subject to **an assessment of their integrity and reputation** by the Ethics & Compliance Department and its international network of ethics and compliance officers according to a risk-based approach. In 2024, the practical modalities of this assessment have evolved thanks to digitalisation, with the implementation of a Group platform for the assessment of the integrity of third parties.

→ In all, + 10,000 third parties were assessed before entering into a business relationship with the Group and throughout the relationship, of which approximately 4,500 are subject to additional checks using two specialized tools for monitoring and detecting ethical and compliance risks.

# Risk prevention and mitigation actions





# 4 / Risk prevention and mitigation actions



The identified risks faced by the Group depend on the nature of the activities as well as the economic, political, cultural and legal context in which it operates.

Thus, for each of the risks identified within the mapping, appropriate measures have been identified and implemented, each benefiting from the support of the related department.



In line with its Code of Ethics formalized in 2014, the Group drafted a **Code of Conduct** in 2018, integrating the themes of the law on the duty of vigilance, applicable to all employees as well as to the management of suppliers and subcontractors.

This Code of Conduct was reinforced at the beginning of 2022 as part of a continuous improvement process.

The Code of Conduct sets out the **fundamental principles applicable to all entities and employees of the Group** in terms of health, hygiene and safety, equal opportunities and non-discrimination, prohibition of harassment, protection of personal data, environment and fight against corruption.

The implementation of these principles is based on several operating procedures applicable to all Group entities.

The Supervisory Board and the Executive Committee, as well as the employee representative bodies, have formally approved this code and support its implementation.

The Code of Conduct is accessible to everyone via the website, in French and English.

## WE SUPPORT



Through its participation in the Global Compact since 2003, Saur Group affirms its commitment to the 10 principles relating to human rights, labour standards, the environment and the fight against corruption. Each year, the Group renews its commitment and communicates on the actions taken to concretize and promote the fundamental values of the Global Compact through its integrated report.

## Health and safety of individuals



### Ensuring health and safety at work

Ensuring the health and safety of employees and external stakeholders is a priority for the Group. Saur implements a health and safety prevention policy, which is applied in all its sites and locations.

A health and safety roadmap was defined in 2022, and its revision is scheduled for 2025. It includes the monitoring of health and safety performance indicators, with ambitious objectives. In France, all the regional directors have declined it to take into account the priorities specific to their territories.

To raise the company to this level of excellence, the Group:

- Ensures that working conditions on its sites ensure the hygiene, health and safety of its employees as well as of any person in contact with the Group (subcontractors, visitors, etc.)
- Delivers the right training, starting with robust security integration.
- Ensures that all applicable hygiene, health and safety instructions are properly disseminated to all those concerned
- Is committed to regularly checking the proper application of the instructions on workstations, by setting up a field audit plan applied to all the Group's entities.
- Promotes the sharing of experience between the different entities,
- Promotes the participation of employees and stakeholders in the identification of risks and the definition of associated action plans (subcontractors, suppliers).
- Promotes work-life balance.

The safety management system is ISO 45 001 certified.

→ In 2024, **79%** of the Group's revenue is covered by ISO 45 001 certification

The management of safety includes the assessment of occupational risks, the definition of action plans relating to major risks, the implementation of regular awareness-raising sessions ("*monthly talks*", *e-learning modules*), the carrying out of audits and behavioural visits in the field.

#### FACILITY SAFETY

Saur advises local authorities on how to improve the safety of their drinking water and sanitation infrastructure by helping them prevent intrusions and malicious acts.

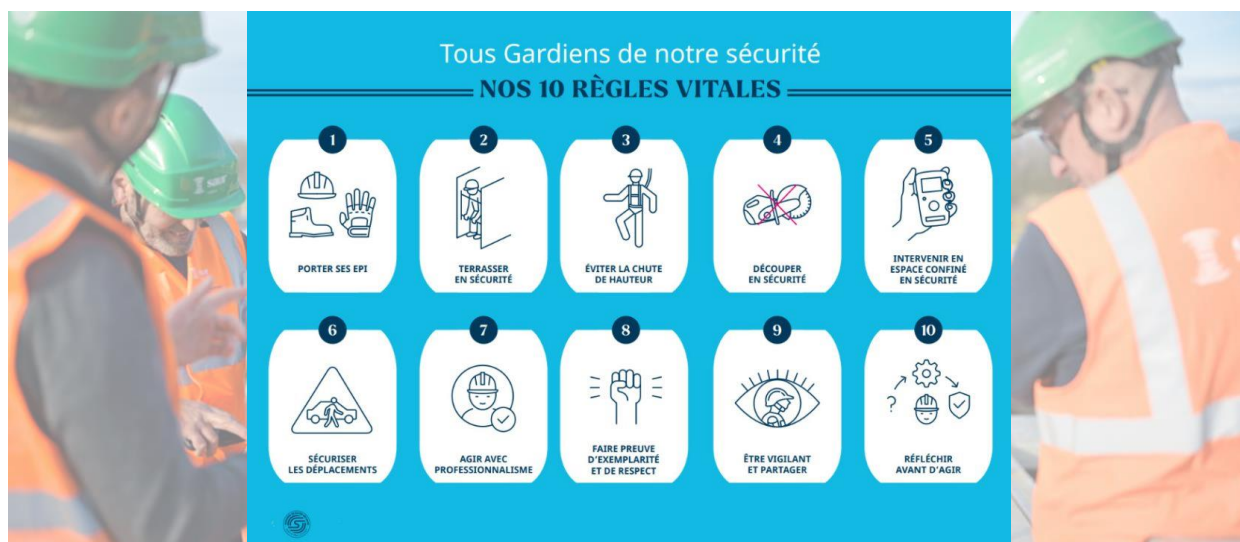
By securing its infrastructure, the Group protects not only its operations, but also all the people present on its facilities, whether employees or external stakeholders, and the environment. [Saur - Facility safety](#)

# 4 / Risk prevention and mitigation actions



Our **culture of prevention** is built around **10 vital rules** and a label common to all Saur Group entities: "All guardians of our safety".

These are **simple and accessible rules** that the Group applies in each of its activity operations. These rules are disseminated via different communication channels (paper, intranet, display on dynamic screens, posters, etc.) and are supplemented by various resources (sheets, REX, etc.).



**With regard to external parties** operating on the sites that the Group operates or its construction sites, prevention plans or General Coordination Plans are systematically drawn up in order to prevent risks and define prevention measures.

- The safety audits carried out on these sites and construction sites make it possible to ensure the implementation of preventive measures.
- Procedures for the intervention of personnel on sites at risk are drawn up and made available to the responders, as well as work instructions detailing the treatments adapted to the installations.
- Strict procedures, such as those associated with the management of hazardous products, are available and subject to internal audits.
- Design reviews dedicated to safety have been implemented within our design and construction activities
- Finally, highly operational risk prevention sheets are available.

In 2024, and after a two and a half year deployment, the Health, Safety and Environment (HSE) system of Nijhuis Saur Industries ("NSI") France, belonging to the **Industrial Water Solutions unit**, was recognized by the **MASE standard** for 3 years.

Obtaining the MASE certification is a testament to NSI France's ability to establish a strong safety culture, train its staff in HSE best practices and ensure a healthy and safe working environment. This success is the result of hard work and a strong commitment to integrating safety and environmental protection principles into the core of its operations.

# 4 / Risk prevention and mitigation actions



In 2024, the "leadership program" was rolled out. It includes the training of managers in "spots", Saur's safety visits. They are based on observation, exchange on risks and the implementation of immediate co-constructed actions.

→ More than **800 safety visits/audits** are carried out every month to adopt and promote the safest behaviours with employees.

In 2023, the Group deployed a tool to manage its employees' security clearances and training.



## Safety, the priority for all

For the first time in Saur's history, on October 17, 2024, the Group organized a joint "Safety Event" for all its employees. The principle of this event was to bring together all the subsidiaries and employees, all business lines and countries combined, on the same day, to start the day on a major safety theme. This convergence has enabled the business lines and territories to share a common set of golden rules, adapted and translated taking into account local specificities and regulations.

In November 2024, Saur France and the General Department for Civil Security and Crisis Management signed a national partnership agreement. The aim of this agreement is to encourage and **support the commitment of Saur employees as volunteer firefighters on a national scale.**



## First Aid Training

The operational staff of one of the Portuguese subsidiaries of Water Services International, in partnership with the local Red Cross, have undergone training in basic resuscitation with automatic external defibrillation, certified by the National Institute of Medical Emergencies and Civil Protection.



## Participating in health security

The quality of the water supplied to users is a key concern for the Group.

In France, drinking water services are governed by the inter-municipal authorities, six Water Agencies (responsible for monitoring and protecting the resource and aquatic life, both in quality and quantity at the scale of the large river basin), and 18 Regional Health Agencies. The same applies in countries where the Group operates drinking water treatment plants, such as Spain and Portugal, where state or regional health authorities are responsible for monitoring water quality, among other things.



Drinking water is one of the most controlled goods. It is subject to permanent surveillance to guarantee its safety. These regulatory health checks (in addition to the continuous monitoring by the operator) are carried out by laboratories approved by the Health Agencies, which take samples according to the established annual program. **These controls aim to verify that the quality of the water complies with all requirements and is respected at all stages**, from the withdrawal of the resource to the glass of water on our table. If a sample is deemed non-compliant by the laboratories, as the drinking water operator, Saur is immediately notified to take appropriate action.

In Europe, the European Drinking Water Directive published in 2020 makes water safety management plans (WSMP) mandatory by 2027-2029. Since 2019, Saur has been supporting its clients' local authority in implementing these WSMPs.

The Group monitors the quality of the water supplied and monitors numerous parameters to ensure compliance with the bacteriological levels and physicochemical properties of the water produced.

These compliance rate indicators are in place across all entities and are subject to Group monitoring and consolidation.

### PFAS

→ In July 2024, Saur inaugurated the new PFAS processing unit in Rumilly, Haute-Savoie. Capable of treating 1800 to 3300 m3 of water and making it drinkable on a daily basis, this unit works thanks to two activated carbon filters. After six months of operation, we found that there were no residual regulatory PFAS in the treated water. This result underlines Saur's skills and expertise in helping local authorities eliminate PFAS, chemicals widely used in industry.



→ Aquapor, the Portuguese subsidiary of the **Water Services** unit, collected 4.5 tonnes of fishing nets, discarded in local ports in the Algarve, between June 2023 and March 2024. This initiative aims to **reduce microplastics that pollute the oceans** and improve recycling. The aim is to produce a new collection of clothing and footwear made from materials derived from the biomass of algae and used fishing nets.

## Environment

*Environmental protection is also one of the main pillars of the Group's 2025-2030 CSR roadmap.*



### Preserving water resources

Saur Group has implemented numerous actions to meet the challenges of water and to give it the value it deserves, in particular to protect and save this natural resource, whose scarcity goes hand in hand with climate change.

#### Measured water consumption

In order to optimise the use of water resources, Saur, with the help of expert partners, offers water efficiency solutions for the benefit of all.

Depending on the use of the Group's municipal and industrial customers, a set of solutions, sober processes, selective sorting, substitution of chemical products, can be proposed to them. The change in water management methods has a direct impact on the lower consumption of water resources.

Saur focuses in particular on treated water reuse actions (known as "REUSE") and offers all its customers, in all regions, simple and impactful REUSE solutions for the development of a circular economy.

In all the countries where it operates its **Water Services** activities, the Group monitors the indicators of the volume of water withdrawn from the environment, overall and by subscriber, these volumes have been steadily decreasing since 2021. In addition, the [info-secheresse.fr](https://info-secheresse.fr) site, which is freely accessible, allows all Saur stakeholders to monitor the state of the resource and the impact of the drought in France.

#### Network Performance

Preserving water resources also means safeguarding the water that is already circulating. Improving the efficiency of the networks is an essential action of the Group in order to limit the water lost to leaks. While this action is conditional on the rehabilitation of pipes, optimised meter management methods and reinforced controls at the point of consumption also help to combat apparent losses of resources.

→ In 2024, the efficiency of Saur's water networks was **79%**, across all 207,457 km of drinking water distribution networks operated worldwide.





## Focus on Blue Bonds

In 2024, we launched our first Blue Bond, inspired by the Green Bond model, dedicated to financing projects to protect and restore water resources.

This launch is part of our sustainability strategy supported by sustainable finance tools, launched in 2020, and reinforces our commitment to giving water the value it deserves.

This initiative also marks a new stage in our contribution to the development of blue finance and for the water transition, by supporting projects with a positive environmental impact, such as the performance of water networks, the adaptation to climate change of drinking water production and wastewater treatment infrastructures for municipal and industrial players, and desalination technologies with a lower ecological impact.

### FIRST DESALINATION PLANT IN PORTUGAL



Aquapor, a subsidiary of Saur **Water Services International** in Portugal, is part of the consortium responsible for the design and construction of this plant, which is scheduled for completion by the end of 2026. It will ensure the supply of drinking water to thousands of people and allow crucial economic activities to continue. The use of renewable energy sources will be promoted, thanks to the installation of a self-consumption plant equipped with photovoltaic panels that will occupy about 4.5 hectares. With these measures, the consortium aims to reduce operating costs while minimizing the impact on the environment. With a production capacity of 16 million m<sup>3</sup> of drinking water in the first phase, the infrastructure is designed to reach 24 million m<sup>3</sup> per year.



## Fighting against pollution

In Saur Group's 2024 double materiality analysis, **pollution** stands out as the second most important impact, confirming our conviction that fighting pollution is a central issue in our business.

**Saur's operational performance essentially consists of combating the risk of environmental pollution**, through:

- Collection and transport of effluents in a network
- Effluent treatment in one of the 2600 wastewater treatment plants operated by the Group
- Maintenance of storage facilities and the network

The Group monitors the quality of the treated water in its wastewater treatment plants, using parameters such as Chemical Oxygen Demand (COD) and Biochemical Oxygen Demand (BOD), key indicators of organic pollution in wastewater. Nitrogen and phosphorus flows in and out of wastewater treatment plants managed by the Group are also monitored to prevent eutrophication of aquatic environments upstream.

The Group is authorized by the French water agencies, or their international equivalents, to self-monitor the quality of the water discharged into the environment by the wastewater treatment plants it operates. All French and international **Water Services** entities can be audited at any time by a consulting firm mandated by the "Water Police" – in particular the DDT (Departmental Directorate of Territories) or the DREAL (Regional Directorate for the Environment, Planning and Housing) in France; SEPRONA (Servicio de Protección de la Naturaleza) in Spain, etc. – to ensure the compliance of our metrology, to take a double sample and to check our results.

For our industrial activities, water treatment processes adapted to our customers' various sectors of activity are put in place, with tripartite control by the customers themselves, Saur and the existing health authorities depending on the country of operation.

### HIGHLY FLEXIBLE MOBILE WATER SOLUTIONS

In industry, water is a critical resource, without which the production stops. It is important, in the event of breakdowns on the water networks, scheduled shutdowns, or to deal with a one-off increase in activity or extreme weather events, to find quick and flexible solutions to meet production challenges and guarantee quality water management and treatment.

With its Mobile Water Solutions range, a subsidiary of the **Industrial Water Solutions** unit, Saur offers a cost-effective alternative to stationary water and wastewater treatment plants in many industrial environments.





## Developing the circular economy

### Saur Services, a new unit of Saur Group for the circular economy

In 2024, the new **Saur Services** unit was created, which brought together the Group's historical hydrocleaning and recovery activities, in addition to the new Odalie brand. These subsidiaries, providing small and medium-sized services, specialise in sludge management (spreading or composting), hydraulic inspection and cleaning, and the removal and treatment of household and industrial waste.

→ **94%** of the sludge from our Group-wide wastewater treatment is recycled

#### THE AQUAPOD, A CONCENTRATE OF INNOVATION TO RECYCLE GREY WATER

Under the Odalie brand, **Saur Services** and InnoYa have developed the Aquapod TM. This **greywater treatment unit reduces drinking water withdrawals from buildings by up to 45%**. It responds not only to the problems of residential buildings, but also to professional buildings in the tertiary, health or hospitality sectors. Equipped with a chemical-free bio-filter and an ultrafiltration unit, the Aquapod eliminates 99.99% of viruses and bacteria from greywater.

The treated water replaces the drinking water from the network to supply new uses: toilet water, watering of green spaces or outdoor cleaning of common areas. Bouygues Immobilier and Nexity, two leaders in the real estate sector in France, have already chosen to use the Aquapod in their future residential and tertiary projects.

### Circularity of water resources:

The reuse of treated wastewater is one of the solutions that must be deployed quickly to meet the challenges of sobriety in water management.

In France, less than 1% of the water comes from REUSE, while other countries use this approach at more than 90%. For manufacturers, the REUSE is part of a strategy for the sustainable development of activities, by improving the environmental and economic performance of the company. A REUSE specialist for more than 15 years, Saur offers all its customers and in all regions simple REUSE solutions that guarantee compliance and fast performance.

### Waste recovery: increasing the efficiency of water treatment processes through technology

Saur, through its subsidiary CirTec, which is part of the **Industrial Water Solutions unit**, has developed **the CellCap® technology**, which makes it possible to collect cellulose from wastewater at the treatment stage. CirTec was awarded the prestigious Lighthouse Award at the BlueTech Forum 2024, recognizing outstanding contributions to innovation and sustainability.

## 4 / Risk prevention and mitigation actions



Many reuse applications are possible, including reprocessing the residue stream on-site to produce biogas and drying and sanitizing cellulose to create a marketable semi-finished product. Other positive impacts observed: once the cellulose has been extracted, the other stages of the treatment are optimised by increasing the capacity of the treatment plant, reducing the sludge produced and reducing energy consumption.

### Waste recovery: with anaerobic digestion, produce carbon-free energy

Producing renewable energy by treating water: this solution is attracting more and more local authorities and industrialists. The anaerobic digestion systems designed by Stereau transform sludge from wastewater treatment into biogas, thus providing a renewable energy source and contributing to a more sustainable management of local resources.

In the industrial sector, the anaerobic digestion offered by Nijhuis Saur Industries makes it possible to treat high-carbon effluents from the agri-food or paper industry in particular. Depending on the technology used, the methanisation of industrial effluents makes it possible to neutralise 80% of carbon pollution, while producing biogas – a renewable energy – which can be used to power a boiler or be injected into the national grid.

Within the **Water Services** unit, many municipalities have adopted it, in France, Castres, Ales, Montauban or Saint-Etienne, as well as internationally in the municipality of Paphos in Cyprus.





## Limiting the impact of our activities on the climate

Saur Group is committed to limiting the impact of its activities on the climate by rapidly reducing its carbon footprint. Carbon intensity is one of the 3 indicators associated with the refinancing of the Group's debt. By raising sustainable bonds linking its financing conditions to the achievement of concrete objectives in terms of environmental and societal performance, Saur confirms its ambition to put social responsibility at the heart of its growth model.

In 2021, Saur committed (Sustainability Linked Bonds, known as "SLBs") to reducing the carbon intensity of its activities to 24 tCO<sub>2</sub>e/M€ of revenue by 2025, in particular through the complete neutralization of its emissions related to electricity consumption, as well as the deployment of a sustainable mobility strategy. This reduction trajectory is particularly ambitious and the achievement of the scope 1 target by the end of 2025 is uncertain to date.

In 2023, Saur has committed to an SBTi trajectory in absolute terms on scopes 1, 2 and 3, with 2021 as reference year.

Since then, Saur has undergone a profound transformation with its various acquisitions and international development. As a result, the Group's carbon trajectory is being updated in order to better adapt to Saur's major transformations, and to take into account the work to improve the reliability of data to refine the Group's carbon footprint.

To meet these objectives, we are activating several levers: reduction of water withdrawals, reduction of energy and reagent consumption via factory settings and the use of artificial intelligence, and improvement of energy efficiency, choice of electricity from renewable sources, self-production, transition of the vehicle fleet, sustainable purchasing, R&D, etc.



**Note:** The reduction in water withdrawals weakens Saur's business model, which is based on invoicing the volumes of water consumed. Aware of this limitation, the Group is exploring new approaches, supported by monitoring volumes taken per subscriber (SLBs), to adapt its business model.

As the consumption of energy resources is the subject of particular attention, Saur has stepped up its monitoring actions through the ISO 50 001 standard on energy management, aimed at improving energy performance indicators.

→ + 50% of the Group's turnover is covered by ISO 50 001 certification

→ **100% of our electricity consumption** is covered by contractual instruments guaranteeing their **renewable origin**.

We work alongside our customers to help them reduce their emissions, with management solutions that optimize water-related energy consumption. We support them in better adapting to climate change with water reuse and circular economy solutions that make it possible to cope with water stress. We also help them produce their own renewable energy by recovering their effluents.

## Human rights and fundamental freedoms

Saur Group aligns its vigilance plan with the "UN Guiding Principles on Business and Human Rights", the OECD Guidelines, the fundamental conventions of the International Labour Organization (ILO) and the UN International Bill of Human Rights.

In addition, Saur acts to protect human rights, as provided for in the Modern Slavery Act in the United Kingdom, for the Industrial Water Solutions entities to which it applies.

As part of a continuous improvement approach, Saur's ambition is to adopt a Human Rights Policy in order to structure its commitments to human rights and fundamental freedoms and to unite employees around the Group's values. This policy, coupled with the sharing of operational prevention and remediation tools, will reinforce the Group's #missionwater purpose, by reaffirming the vital importance of the right to access to drinking water and sanitation for all.



### Fighting discrimination

Saur is committed to ensuring that gender diversity is respected within the company.

In this sense, the Equal Opportunities Agreement guarantees the smooth running of careers for all employees in order to avoid any form of discrimination: careers of seniors, returns from maternity leave, teleworking, etc.

Gender diversity is a priority issue for Saur. The feminization of executive positions is also a target that is part of the societal commitments on which the financing of the Saur Group's debt depends.

The ElIEau internal network for gender diversity, which has been in existence since June 2018, also covers these issues, in particular through three areas of action:

- Recruiting female talent
- Career support
- The change of mentalities.

→ For the second year in a row, Saur has achieved a **score of 99/100 points on the Professional Equality Index**, a system that measures the pay gap between women and men

The percentage of employees declared to be disabled at Saur is 2.3% in 2024 worldwide. Aware that there is still work to be done and the importance of this subject, Saur Group is taking action to change mentalities. Since 2021, training on the integration of employees with disabilities has been offered on the e-learning platform.

→ As part of our commitment to inclusion, **100%** of Water Services France's recruiters have been made aware of disability in order to remove prejudices, better understand disability situations and adopt the right recruitment reflexes.

Finally, disability is one of the major themes of the Equal Opportunities Agreement, and is the subject of monitoring indicators within the CSR roadmap 2025-2030.





## Supporting people in emergencies

### Supporting victims of climate disasters

Throughout 2024, Saur's teams were particularly confronted with the consequences of global warming in France, Spain and the United States.

Among the many emergencies facing the authorities and the population, restoring access to drinking water is at the top of the list. Our teams have mobilized to help the victims, by sending pallets of drinking water to respond to the health emergency, by lending essential equipment to restart water and sanitation facilities quickly, but also by intervening on site alongside local teams to restore the operation of vital facilities.

#### • In Spain – Gestagua mobilized to restore water after floods in the Valencia region

The Spanish teams mobilized from the first hours of the disaster, using human and material resources diverted from other regions, with the support of subsidiaries in France and Portugal.

→ 182 mobile units have been deployed in the affected areas to ensure a continuous water supply.

#### • In Mayotte – The Combani borehole comes into service after cyclone Chido

On 14 December 2024, Cyclone Chido severely damaged drinking water infrastructure in Mayotte, reducing production to 45% (22,000 m<sup>3</sup>/day compared to 50,000 m<sup>3</sup>/day before the cyclone). Faced with this supply crisis, Les Eaux de Mayotte (LEMA) asked Saur to commission the Combani borehole earlier in order to increase the island's water production. Our subsidiary Stereau immediately responded.

In close collaboration with our partners and subcontractors, we coordinated this operation. Several essential preliminary steps, such as ARS analysis and electromechanical and hydraulic tests, had been validated before the Chido passage. However, as the return tarpaulin was not fully ready to carry water, our technicians had to install a bypass to ensure the proper functioning of the installation. Thanks to this rapid adaptation, the Combani borehole was commissioned earlier, becoming the most efficient in Mayotte with a capacity of 84 m<sup>3</sup>/h (1,680 m<sup>3</sup>/day).

This operation was completed on December 25, 2024. From that date, the Combani borehole began to supply the distribution network of the operator SMAE, significantly increasing the capacity for the production of drinking water and bringing essential relief to the population of Mayotte at this critical time.



## Promoting ethics and compliance

Saur Group is responsible to its employees, shareholders, customers and consumers, suppliers and subcontractors, as well as civil society. The Group's Code of Conduct recalls the ethical values that are an integral part of Saur's culture.

Each employee is expected to respect the commitments made by the Group, in particular in terms of:

- Corruption and influence peddling
- Conflicts of interest
- Gifts and Hospitality
- Commercial intermediaries
- Sponsorships
- Business relationships with third parties

Any violation of the Code of Conduct by Saur Group employees may result in sanctions proportionate to the fault observed, including disciplinary misconduct.

Fully aware that corruption and any breach of probity are highly detrimental to its entire ecosystem, Saur has implemented a set of measures to combat all forms of corruption.

A mapping of the risks of corruption and influence peddling has been carried out to identify the risk situations with the most important stakes, on which prevention, detection and control systems must focus as a priority.

Training activities are carried out for employees, particularly people in exposed positions identified by the mapping of corruption and influence peddling risks.

As part of its activities, the Group is in contact with stakeholders of a wide variety of types (Customers, suppliers, service providers, subcontractors, partners, sponsorship beneficiaries, etc.), both in France and internationally.

Any relationship with these stakeholders commits Saur and creates legal, financial or even moral responsibilities. Third-party practices may have an impact on our reputation. We expect them to act with integrity and in accordance with applicable laws and regulations. This is why Saur is particularly vigilant in the choice of its business relationships and has therefore set up assessment procedures aimed at identifying and controlling any risks or points of attention in terms of integrity. These assessments are implemented as part of a risk-based approach that leads to more in-depth due diligence when the issues require increased vigilance.

To go further, the Group initiated a certification process to the ISO 37001 anti-corruption standard, which it obtained in July 2019 for its entities in France and which is still in force.



## Developing responsible purchasing

The selection of suppliers and subcontractors is the subject of particular attention by the Purchasing Department. A specific procedure specifies the criteria for selecting suppliers and subcontractors and service providers. These criteria cover the themes of safety, quality, ethics and compliance, CSR and environment, energy and economic/financial.

As part of a systematic continuous improvement approach, Saur Group is strengthening its responsible purchasing process.

**Procurement is a major part of our overall vision of Performance and Sustainable Development**, and is fully in line with Saur's sustainable development roadmap.

- Quality, long-term and trusting relationships with our stakeholders, and in particular with our suppliers, are essential to the long-term success of the Group.
- We seek to collaborate with suppliers and service providers who are committed to the development and implementation of a responsible supply chain in a sustainable way.
- Driven by these convictions, the Purchasing Department has defined a strategic and operational roadmap to support the Saur Group's sustainability ambitions.

The **Supplier and Subcontractor Relationship Charter** formalises Saur's vision of business relations and sets out the Group's commitments in terms of sustainable development, as well as its own commitments as a client.

In addition, **Saur France's Responsible Purchasing Policy**, applicable to all Group units operating in France, includes **6 commitments for 2025** :

1. To guarantee and promote business relationships based on the principles of impartiality, equity, loyalty, good faith, and respect for human rights and the environment.
2. Raise awareness among our teams of the challenges of sustainable development and responsible purchasing.
3. Control risks in the supply chain and include CSR in all purchasing processes.
4. Combining economic performance and sustainable development by favouring suppliers committed to a social and environmental responsibility approach.
5. Use local purchases and promote actors in the Social and Solidarity Economy (SSE).
6. Engage with our suppliers to reduce greenhouse gas emissions.

Responsible purchasing implies that Saur assumes the extent of its responsibility, in total transparency with its various stakeholders, both internal and external.

This Responsible Purchasing Policy is gradually being rolled out to international entities.

# 4 / Risk prevention and mitigation actions



## Protection of personal data and GDPR:

Saur Group attaches paramount importance to the protection of personal data and ensures compliance with the European Union's General Data Protection Regulation (GDPR), which came into force in 2018.

Through its Water Services France and International units, Saur collects and processes users' personal data as part of the management of drinking water and sanitation services. The Industrial Water Solutions unit collects and uses data from its industrial customers to respond to requests, provide services, and improve the user experience.

Therefore, the Group collects information such as name, address and contact details, email address, and other personal data for the management of subscriptions, during interactions with customer service or for the use of the online space, and uses it in a secure and transparent manner.

The Group, through dedicated processes and procedures, managed by its Data Protection Officer:

- Maintains a data protection policy to inform users of the use of their data, taking into account legislative developments
- Implements security measures to prevent unauthorized access, misuse, or data leakage.
- Guarantees users and any other data subject their rights, such as the right of access, rectification, opposition and erasure, which they can exercise by contacting customer service, or through a dedicated channel.



## Labels and Certifications:



In October 2024, Saur Group was awarded the **Ecovadis Gold Medal** for its CSR performance with a score of 77/100. More specifically, Saur received a score of 80/100 on the Social and Human Rights pillar, one of the four pillars evaluated.

Certified



In September 2024, our entity NSI UK & Ireland, part of the **Industrial Water Solutions** unit, obtained **B Corp certification**, a movement that recognises all companies that stand out for their good practices in transparency, ethical business practices and positive social, societal and environmental impact.



## saur solidarités

**Celebrating its 10th anniversary in 2024, the Saur Solidarities** endowment fund embodies a coherent response adapted to the Group's ambition to be a socially responsible and locally committed company. Attentive to the challenges specific to each region and in close collaboration with the Group's employees, it carries out projects of general interest, aimed at strengthening social ties and revitalizing the living areas in which Saur operates.

**Saur Solidarities** mainly supports actions carried out by associations, but also decentralised cooperation projects. Each initiative is sponsored by an employee of the Group, who is responsible for the seriousness of the project, but also a player committed to real human adventures from which he or she generally emerges grown and proud.

**Saur Solidarities'** action is complementary to the social responsibility initiatives carried out by the Group. Its vocation is to develop, create or participate in initiatives in favor of solidarity and local development, in France and internationally. These actions are in particular in the following areas:

- Water and sanitation:** promoting access to quality drinking water, the development of sanitation infrastructure and the sustainable management of water resources, by financing or implementing appropriate solutions, where the needs are most critical.

- Professional integration:** as a local partner in professions accessible to all levels of qualification, Saur Solidarités offers solutions adapted to local contexts to promote the integration of young people and people in difficulty, support the employment of people with disabilities, develop skills, fight against discrimination and promote equal opportunities.

- Disability:** Saur Solidarités works to improve the quality of life of people with disabilities, thus contributing to a more inclusive society. Medical research, development of adapted technologies, accessibility of public spaces, educational and cultural programs: these are all levers that the endowment fund seeks to activate.

→ **Since 2014, 103 associations have been supported** via the Saur Solidarities endowment fund, **benefiting more than 798,000 people.**

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# Monitoring measures and evaluation of effectiveness





# 5 / Monitoring measures and evaluation of effectiveness



In order to monitor the measures implemented and evaluate their effectiveness, Saur Group relies on indicators established as part of its extra-financial reporting (known as the "CSR report") that cover the scope of the Duty of Care, as well as on the Group's risk management system. This reporting is drawn up at least once a year and the indicators are published in the CSR report.

A selection of indicators published in the CSR report is reviewed by an independent third-party body that attests to the reliability of the data published.

| Indicators  | Perimeter | 2024   | 2023  |
|---|-----------|--------|---|
| Group Profile   |           |        |   |
| Number of employees   | Group     | 12 083 | 11 523  |
| Turnover, in billions of €  | Group     | 2.3    | 2.09  |
| Evaluation of entities, suppliers and subcontractors                                    |           |        |   |
| Share of turnover covered by ISO 14001 certification, in %                              | Group     | 77     | 82  |
| Share of turnover covered by ISO 45001 certification, in %                              | Group     | 79     | 80  |
| Share of turnover covered by ISO 50001 certification, in %                              | Group     | 56     | 63  |
| Number of new third-party evaluations prior to and throughout the business relationship | Group     | 4785   | 10209<br>Platform launch year, higher number of initializations |
| Risk prevention and mitigation actions  |           |        |   |
| Efficiency of drinking water networks, in %   | Group     | 78.8   | 79  |
| Share of sludge discharged recovered, in %  | Group     | 94     | 98  |
| Carbon intensity on scopes 1 and 2 (3-year rolling average), in tCO <sub>2</sub> e/M€   | Group     | 38.4   | 74.9  |
| Frequency rate of occupational accidents  | Group     | 13.5   | 10.3  |
| Severity rate of occupational accidents   | Group     | 0.74   | 0.57  |
| Share of women in management positions, in %  | Group     | 32.5   | -   |
| Percentage of employees declared to be disabled   | Group     | 2.3    | 2.3   |
| Number of organisations supported via the Saur Solidarities endowment fund              | France    | 10     | 14  |
| Share of the workforce covered by the alert system, in %                                | Group     | 99     | 92  |

# 5 / Monitoring measures and evaluation of effectiveness



For several years, the Group has placed compliance with ESG criteria at the heart of its growth strategy. In 2021, Saur was the first player in the water sector in France to finance its growth through sustainable bonds: Green bonds and Blue bonds.

In order to assess the progress made in our sustainable performance, we use 3 structuring key performance indicators. All three represent stakes that society as a whole must address, in order to restore the water balance and become more resilient to climate change and geopolitical developments.

These three indicators are in line with both the main challenges of the sector and our own strategy.

- **Reducing water withdrawals** : As a water player, everything we do is aimed at preserving water and promoting its responsible use. Our goal with this indicator is to consistently reduce annual water withdrawals in the areas where we provide water services. In numbers, this means constantly reducing the volumes of water withdrawn from the environment per subscriber each year.
- **Decarbonizing our operations** : We are doing our part in the fight against climate change by committing to significantly reduce our carbon footprint in the short term. In numbers, we will divide our carbon intensity by 6 in scopes 1 (direct emissions) and 2 (emissions related to electricity consumption) by 2025.
- **Achieving gender equality in leadership** : Greater diversity and inclusion drive engagement, performance, and innovation. Our goal here is to have at least 34% women in leadership positions by 2025, and 39% by 2030. This indicator is in line with the United Nations' Sustainable Development Goal 5: achieve gender equality and empower all women.

In 2023 and 2024, as part of the annual self-assessment campaigns conducted by the Internal Control Department, new environmental impact and human rights controls were added to the list of assessed controls.

The Group's annual self-assessment campaign is a tool for measuring the level of compliance that lists and describes the key controls as they must be implemented to cover risks in each entity of Saur Group. The objective is to identify the non-conformities of the assessed scope and to define action plans accordingly to improve the execution of the control and achieve the required level of compliance.

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# Alert mechanism and reporting system



# 6 / Alert mechanism and reporting system



In accordance with Law No. 2016-1691 of 9 December 2016 on transparency, the fight against corruption and the modernisation of economic life, known as the "Sapin II Law", and Decree No. 2017-564 of 19 April 2017, Saur has set up a **Group Whistleblowing system and formalised a procedure for collecting and processing reports.**



This procedure also meets the obligations arising from the law of 2017 on the Duty of Vigilance of parent companies and contracting companies, which requires the establishment of a mechanism for alerting and collecting reports relating to the existence or occurrence of risks.

It also takes into account Law No. 2022-401 of 21 March 2022 to improve the protection of whistleblowers and Law No. 2022-400 of 21 March 2022 to strengthen the role of the Defender of Rights in terms of whistleblowing.

This device can be used in particular to report any behaviour that contradicts the principles of Saur's Code of Conduct and any serious infringement or risk of serious infringement of human rights and fundamental freedoms.

This mechanism guarantees confidentiality and the absence of sanction measures against the authors of reports acting in good faith and in a disinterested manner.

When an employee is confronted with or observes a situation likely to characterize a violation of the Code of Conduct or a breach of a legal and regulatory obligation, he or she may report it to his or her line manager and/or to the Ethics and Compliance Department, in particular via the reporting system set up by the Group.

The scheme is open to all internal and external stakeholders of the Group.

→ In 2024, + **99% of the Group's workforce** were covered by this scheme.

Link to the platform: <https://saurgroup.alert-report.com>

# Reference Frameworks and Sources of Information







## Reference Frameworks



### UN and Office of the High Commissioner for Human Rights

- Universal Declaration of Human Rights - 1948
- International Covenant on Civil and Political Rights - 1966
- International Covenant on Economic, Social and Cultural Rights - 1966
- Convention on the Rights of the Child – 1989
- United Nations Declaration on the Rights of Indigenous Peoples - 2007
- Resolution "Right to a clean, healthy and sustainable environment" July 2022
- RIO Declaration – 1992
- Convention on Biological Diversity - 1992
- World Charter for Nature – 1982
- United Nations Guiding Principles on Business and Human Rights and the United Nations "Protect, Respect and Remedy" Framework - 2011



- OECD Guidelines for Multinational Enterprises on Responsible Business Conduct - 2023
- Duty of Care Guide for Responsible Business Conduct – 2018



### Fundamental ILO Conventions

- Freedom of Association and Protection of the Right to Organise Convention (No. 87) (1948)
- Right to Organise and Collective Bargaining Convention (No. 98) (1949)
- Forced Labour Convention (1930) (No. 29) and its Protocol of 2014 as well as the Recommendation (No. 203)
- Convention No. 105 on the Abolition of Forced Labour (1957)
- Minimum Age Convention No. 138 (1973) and Recommendation (No. 146)
- Convention No. 182 on the Worst Forms of Child Labour (1999)
- Equal Remuneration Convention (1951) (No. 100)
- Discrimination (Employment and Occupation) Convention (1958) (No. 111)
- Occupational Safety and Health Convention, 1981 (No. 155) and Recommendation (No. 164)
- Promotional Framework for Occupational Safety and Health Convention (No. 187) (2006)





## Methodological references

### ISO Standards

- ISO 31000: Risk Management — Guidelines
- ISO 31010: Risk Management — Risk Assessment Techniques
- ISO 20400: Responsible Procurement Guidelines
- ISO 26000: Guidelines for social responsibility

### Human Rights Risk Assessment Frameworks :

- **GRI** - Consolidated set of GRI standards
- **SHERPA** - Reference Guide for Vigilance Plans – 2018
- **Business and Human Rights Resource Center** - Human Rights Due Diligence & Impact Assessment
- **SHIFT** - Doing business with respect for human rights
- **SHIFT** - Business and Human Rights Impacts: Identifying and Prioritizing Human Rights Risks – Shift – 2014
- **SHIFT** - Climate Action and Human Rights: How the UN Guiding Principles can help companies respect human rights when responding to climate change – 2023
- **BSR** - Human Rights Assessment Identifying Risks, Informing Strategy
- **The Danish Institute for Human Rights** - Human rights impact assessment guidance and toolbox
- **Haut-Commissariat aux Droits de l'Homme** - HUMAN RIGHTS TRANSLATED 2,0 - A Business Reference Guide – 2016
- **PNUD** - Human Rights Due Diligence (HRDD)
- **PNUD** - Human Rights Due Diligence Training Facilitation Guide
- **PNUD** - Human Rights Risks in Business Operations
- **GLOBAL COMPACT** - A Guide for Business How to Develop a Human Rights Policy – 2015



## Reports

This work is also based on the exploitation and analysis of several reports, including:

- **UNICEF** : The State of the World's Children 2024
- **UNDP** : Human Development Report 2023-2024 "Breaking the Deadlock: Rethinking Cooperation in a Polarized World"
- **ILO** : Child labour: Global estimates 2020, trends and the way forward – 2022
- **UE** : Study on due diligence requirements through the supply chain – 2020
- **European Union Agency for Fundamental Rights** : Business-related human rights abuse reported in the EU and available remedies - 2019



## Industry-specific sources of information

- **SASB** – Standards sectoriels
- **MSCI** - Materiality Map
- **GLOBAL COMPACT** - Guidance for Companies on Respecting the Human Rights to Water and Sanitation - 2015
- **UN** - United Nations World Water Development Report "Water for Prosperity and Peace" 2024
- **ONU** - Human Rights to Water and Sanitation
- **United Nations** - Resolution 64/292 adopted by the General Assembly on 28 July 2010 - The human right to water and sanitation
- **GWP/OCDE** - Securing water, sustaining growth
- **CDP Water** - Stewardship at the Source - Driving water action across supply chains - 2024
- **WWF HSBC** - Understanding water risks



## Tools

As part of the analysis of our risk exposure, we also consulted several sources of information and tools:

- **EU observatory** on deforestation and forest degradation
- **Integrated Biodiversity Assessment Tool**
- **ENCORE Nature** (Exploring Natural Capital Opportunities, Risks and Exposure)
- **WWF Risk Filter**



**Sustainability Department**  
March 2025