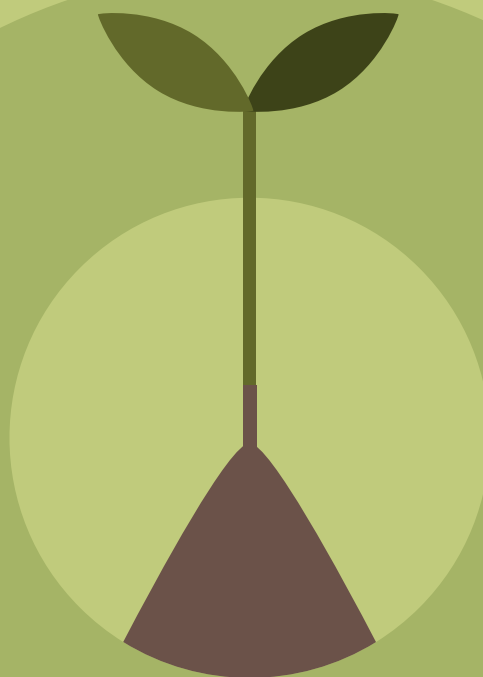


WIFIRST COP 2022

Communication on progress





Introduction

Through this communication on the progress made in the year 2021, Wifirst, European leader in WiFi as a service, reiterates its commitment to sustainably integrate the Ten Principles of the United Nations Global Compact into its business strategy, in particular by contributing to the Sustainable Development Goals (SDGs).

In line with its CSR commitment, Wifirst relies on these objectives to define its commitments and ambitions while aligning itself with the 2030 agenda. It puts technology and innovation at the service of society by supporting the digitisation of companies thanks to its sustainable multi-service WiFi.

Wifirst respects the Global Compact principles and undertakes to be:

- A responsible employer, concerned about the wellbeing of its employees,
- A responsible partner that respects human rights with regard to employees, clients, suppliers and subcontractors
- A responsible operator by deploying a resilient infrastructure and developing a sober digital infrastructure with a concern for eco-design.

It thus implements responsible digital technology by integrating competitiveness, innovation, regulatory compliance, social and environmental responsibility and sustainable strategy in its areas of growth.



1. A commitment on the part of our founding president

1st December 2022,

I am happy to confirm that Wifirst reiterates its support for the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, the Environment and the Fight against Corruption.

We place sustainability and inclusiveness at the heart of our strategy. Through our membership in 2021, I am committed, with all the Wifirst teams, to durably integrate the Ten Principles of the United Nations Global Compact into our corporate strategy, in particular by contributing to the Sustainable Development Goals (SDGs).

For the sake of transparency and openness, I would like to share with you through this first "Communication on Progress" edition, the ac-







tions carried out and the CSR results of Wifirst for the year 2021.

In particular, we describe the actions we are taking to constantly improve the integration of the Global Compact and its principles into our company's strategy, culture and operations.

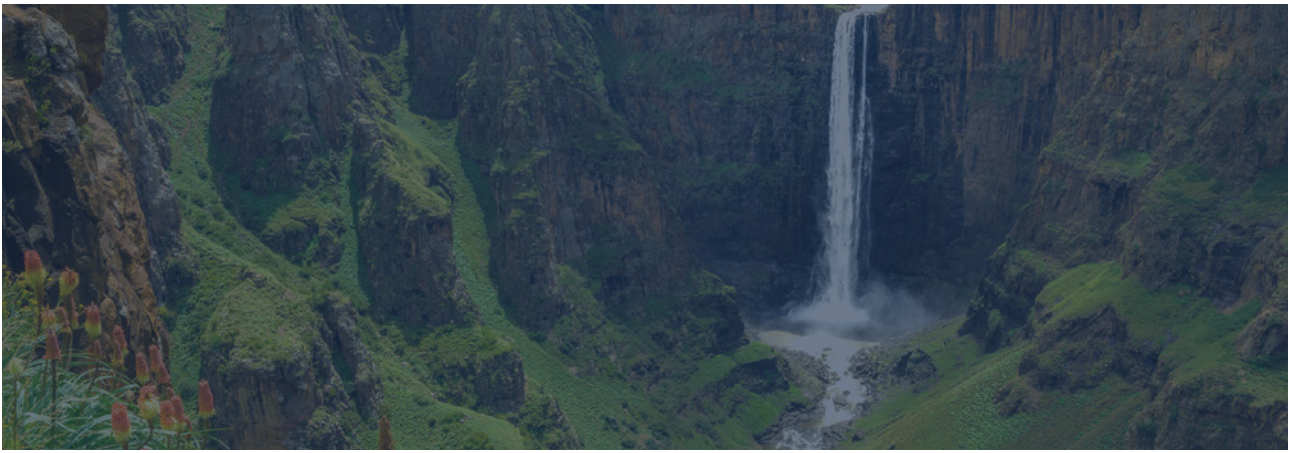
We are also committed to sharing this information with our stakeholders through our main communication channels.

Marc Taieb

Wifirst, contributing to the objectives of sustainable development

3  HEALTH & WELLBEING	4  QUALITY EDUCATION	5  GENDER EQUALITY	11  SUSTAINABLE CITIES & COMMUNITIES	12  FRENCH CONSUMPTION & PRODUCTION	13  MEASURES RELATING TO THE FIGHT AGAINST CLIMATE CHANGE
<p>By working for the wellbeing of its employees and all of its stakeholders</p> <p>2021 Redevelopment of premises.</p> <p>Premises accessible throughout the pandemic.</p>	<p>By ensuring access to quality education both for its employees and through the service it offers.</p> <p>2021 Training of its employees on ethics, safety and the environment.</p> <p>Bonus: Climate fresco.</p>	<p>By having a policy of recruitment, management, training and internal development. This requires professional equality between women and men, from the time of recruitment and throughout their career in the company.</p> <p>2020 Index: 61/100</p> <p>2021 Index: 74/100</p>	<p>By deploying a resilient infrastructure, developing its own digital infrastructure with a view to eco-design and promoting access to digital technologies.</p> <p>2021 Proposal of a responsible offer.</p>	<p>By establishing sustainable modes of consumption and production by organising its client experience around transparency and developing its service proposal around responsible digital technology.</p> <p>2021 Implementation of the circular economy with the systematic reconditioning of non-obsolete equipment.</p>	<p>By fighting climate change by reducing its carbon impact.</p> <p>2021 1st carbon footprint assessment based on the 3 scopes.</p>

Wifirst's objectives are therefore very clear, the operator puts technology and innovation at the service of society by supporting the digitisation of companies thanks to its sustainable multi-service WiFi.



2. Reminder of the 10 principles of the Global Compact



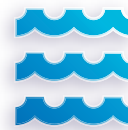
Human rights

1. Businesses should support and respect the protection of internationally proclaimed human rights;
2. Businesses should make sure that they are not complicit in human rights abuses;



International labour standards

3. Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
4. The elimination of all forms of forced and compulsory labour;
5. The effective abolition of child labour;
6. The elimination of discrimination in respect of employment and occupation.



Environment

7. Businesses should support a precautionary approach to environmental challenges;
8. Undertake initiatives to promote greater environmental responsibility;
9. Encourage the development and diffusion of environmentally friendly technologies.



Anti-corruption

10. Businesses should work against corruption in all its forms, including extortion and bribery.



3. Description of actions carried out in 2021

HUMAN RIGHTS

PRINCIPLES

- **Principle 1:** businesses should support and respect the protection of internationally proclaimed human rights.
- **Principle 2:** businesses should make sure that they are not complicit in human rights abuses.

IMPLEMENTATION

Wifirst adheres unreservedly to the principles of the Universal Declaration of Human Rights, undertakes to promote and respect the protection of international law relating to Human Rights in its sphere of influence and ensures not to be complicit in human rights violations, whatever they may be. Wifirst applies the laws and regulations in force in the countries where it operates and where it is established.

In the same way, Wifirst fights against all forms of discrimination and is committed to equal treatment of its employees, whether in terms of recruitment, remuneration, working conditions or professional development. Any considerations relating to gender, age, religion, ethnic origin, marital status, sexual orientation or political beliefs are not tolerated by the company. Wifirst as a responsible digital player and as a responsible employer, relies on respect for ethical principles and human rights as defined in:

- The Universal Declaration of Human Rights
- Declaration of the International Labour Organization (ILO) on fundamental principles and rights at work
- The United Nations Global Compact
- Wifirst is committed to being a responsible partner and respectful of human rights with regard to its employees, clients, suppliers and subcontractors.

The frame of reference, which expresses Wifirst's commitment to systematically respecting the laws and regulations in force, as well as the major international fundamental principles; Wifirst's commitments in terms of ethics in the conduct of business, in terms of loyalty and respect for people, compliance with trade rules or protection of property and data; the specific commitments made to the main categories of stakeholders.

By strictly respecting the GDPR Policy Wifirst demonstrates transparency with its employees by also introducing the notion of ethics within the company. In 2021, Wifirst signed up to the responsible digital charter because the future depends on transparent and reassuring digital use for all. It undertakes, among other things through this membership, to implement ethical and responsible digital practices.

An IT charter has been signed by all employees. The purpose of the Charter is to specify the rights and responsibilities of users in accordance with legislation and company policy, in order to establish a compliant use of the IT Tools and associated services, implemented by Wifirst and necessary for its activities.

HEALTH & WELLBEING

Wifirst ensures the wellbeing of its employees through a healthy working environment

In 2021, Wifirst refurbished its premises to accommodate its employees in an environment adapted to changes in working methods. The redevelopment has made it possible to improve the comfort of the common areas and conviviality spaces, to provide more meeting spaces and to equip them in such a way as to facilitate meetings in phygital, install a shower and an upgraded break area



Before



After

Wifirst employees were consulted through fun workshops to determine their needs and desires for the future premises. We wanted our redevelopment to be part of a frugal energy approach and to raise employee awareness of ecological issues and the circular economy (sorting, conserving, moving, donating, recycling).

To start the work, we had to empty the premises and we chose to do so by incorporating the reuse and recycling of furniture. To support us, we called on Tricycle, a circular economy and SSE (Social and Solidarity Economy) company, which helped us empty our premises.

In addition, the refurbishment made it possible to update all the safety signs in the premises, fire extinguishers, evacuation plans, modernise alarms and door openings in order to ensure the health and safety of employees and visitors.

Given the context linked to the health situation in 2021, Management regularly communicated on the measures in force and the changes in health protocols. A COVID adviser has been appointed and the occupational risks linked to COVID-19 have been integrated into the DUERP (Single Occupational Risk Assessment Document).



Wifirst gives a key role to professional training.

In 2021, 56 training events were organised on various themes, for a total of 1,165 hours of training. The average duration of a training course was 21 hours, i.e. 3 days.

Wifirst has also created new partnerships with training organisations offering new e-learning or remote formats, in order to promote accessibility and skills development for teams.

Policy for supporting young people towards employment:

Wifirst wishes to continue its training and hiring support for young talent in the telecommunications sector. Thus, Wifirst signed nine apprenticeship and professionalisation contracts in 2021 (+50% compared to 2020).

It should be noted that one of the apprentices had already been on a work-study programme at Wifirst and asked the company for a new apprenticeship contract in order to continue his higher education course, to which Wifirst responded favourably. An employee also told us of his wish to resume his studies and we supported him favourably in this process.



Climate fresco

Each quarter, Wifirst offers its employees a moment of sharing on a theme directly or indirectly related to the world of Wifirst, called Witalk. External speakers come to share their ideas in order to make the telecom sector more inclusive and sustainable. In 2021, the theme of fake news was addressed since, as a specialist in connectivity, Wifirst must raise awareness among its employees as much as possible about the issues related to this topic.

An ISSP reference system has also been developed to reflect Wifirst's desire and requirements to implement the means to protect as effectively as possible the assets represented by the Information Systems, with all their elements (information and their different means of sharing, processing, exchange and storage) and to preserve their functioning as a production tool for users.



WiShare 2021



PROFESSIONAL EQUALITY INDEX 2021: 74/100

Pay gap between men and women:
34/40 **(+7 vs 2020)**

Difference in individual raise rates:
25/35 **(no change from 2020)**

Percentage of employees who received
a raise in the year following their return
from maternity leave: 15/15 **(+15 – no
indicator for 2020)**

Number of employees of the under-re-
presented sex among the 10 highest
earners: 0/10 **(no change from 2020)**

Wifirst's commitment to its employees is reflected in its recruitment, management, training and internal development policy. Wifirst's ambition is to promote an inclusive culture allowing everyone to fully reach their potential, whatever their uniqueness. This notably involves professional equality between women and men, from the time of recruitment and throughout their career in the company.

Wifirst saw its professional index increase from 61/100 in 2020 to 74/100 in 2021.

- **Recruitment:** 63 new hires in 2021 (excluding work-study programmes and internships), of which 24% women. With equal skills and equivalent position, men and women are hired at the same level of remuneration. In 2021, Wifirst succeeded in attracting female profiles to positions considered masculine, in particular within the Operations Department and the Technical Department.
- **Workforce:** Our positions are mainly technical and attract a majority of male applicants. As of 12/31/2021, women represented 24% of our workforce (20% in 2020).
- **Salary increase policy:** In 2021, the percentage of employees eligible for a raise was equivalent between women and men.
- **Return from maternity leave:** A return interview after a long absence is also systema-

tically offered in order to take stock of the past year and prepare for the return to work with complete peace of mind.

- **Training:** The training events organised in 2021 were mainly technical and regulatory, for a population mainly composed of men (integrator auditors, network administrators, developers, field representatives in operations, etc.). The average duration of training for men was 20 hours and for women 24.5 hours. In 2021, 1 in 5 employees who benefited from a training event was female.
- **Promotion:** In 2021, 1 promotion out of 3 was offered to a woman.
- **Support for external initiatives:** Wifirst supports external initiatives by paying its apprenticeship tax to associations such as «Elles Bougent», which aims to introduce young female high school and university students to the exciting professions of technician and engineer.



Exchanges



✦ INTERNATIONAL LABOUR STANDARDS

PRINCIPLES

- **Principle 3:** businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.
- **Principle 4:** businesses should support the elimination of all forms of forced and compulsory labour.
- **Principle 5:** businesses should contribute to the effective abolition of child labour.
- **Principle 6:** businesses should contribute to the elimination of discrimination in respect of employment and occupation.

IMPLEMENTATION

Wifirst has created a healthy ecosystem with all of its stakeholders. It has worked with the same suppliers and technicians, who Wifirst integrates, for several years. In order to verify the compliance of its suppliers and production sites, it includes dedicated clauses in each of its contracts.

Wifirst has implemented a responsible purchasing policy and charter. It will be rolled out to relevant stakeholders in 2022.

It should be noted that the responsible purchasing policy encourages solidarity with people in difficulty or with disabilities. Wifirst makes purchases from organisations employing people who are unemployed or have a disability. As such, Wifirst works with several ESATs (sheltered employment sector companies) and with a social integration company for the maintenance of its premises.

Like its clients, Wifirst wants the equipment it deploys and operates to be manufactured and distributed in compliance with the law on the abolition of slavery and human trafficking in supply chains. Consequently, Wifirst has taken steps to ensure that its direct supply chain for marketed products remains compliant with applicable laws in this area.

In particular, Wifirst ensured that the code of conduct of its main suppliers was based on the code of conduct of the RBA (Responsible Business Alliance, former "Electronics Industry Citizenship Coalition"). The RBA brings together several social and ethical standards that prohibit the use of any forced, imprisoned, bonded or coerced labour and involuntary prison labour.

Wifirst works in particular with Cisco, Ruckus and Juniper, all three members of the RBA.

Wifirst guarantees social dialogue with all employees and in a particular way with the staff representative body. More generally, Wifirst ensures that working conditions are healthy, safe and free from violence, bullying, harassment or threats.

10 CSE (Committee for Employee Representation) meetings

252 hours of training for the elected



ENVIRONMENT

PRINCIPLES

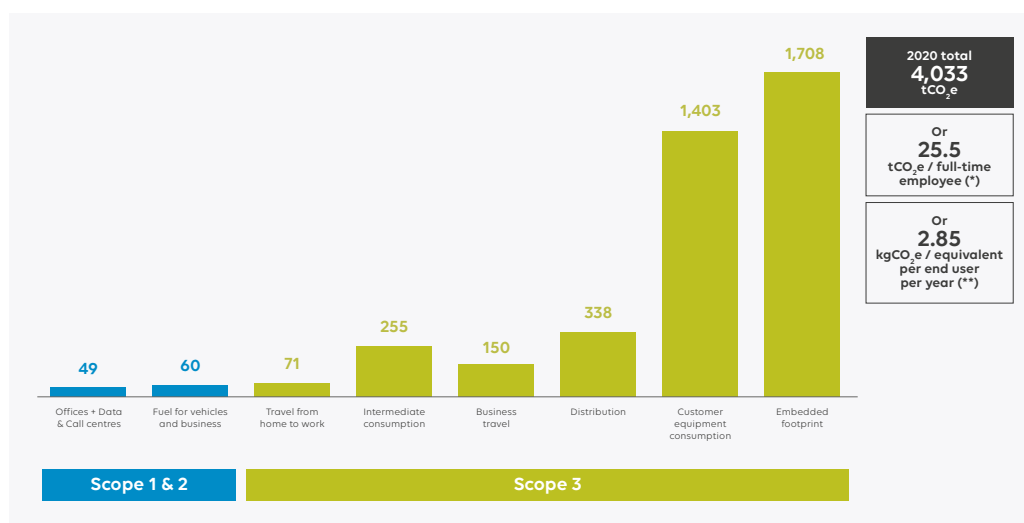
- **Principle 7:** businesses should support a precautionary approach to environmental challenges.
- **Principle 8:** businesses should undertake initiatives to promote greater environmental responsibility.
- **Principle 9:** businesses should encourage the development and diffusion of environmentally friendly technologies.

IMPLEMENTATION

Wifirst conducts an environmental policy aligned with the Sustainable Development Goals and the Paris Agreements.

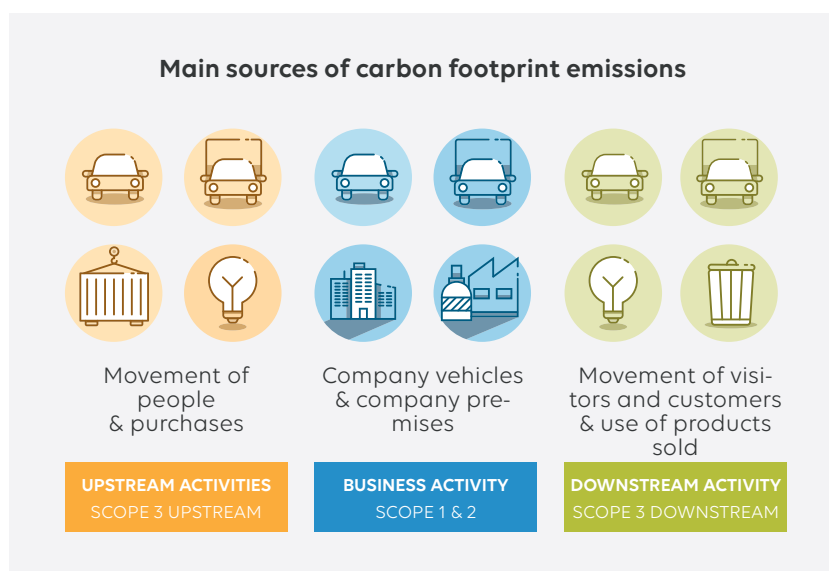
MEASURES RELATING TO THE FIGHT AGAINST CLIMATE CHANGE

Therefore, in 2020, it carried out its carbon footprint assessment based on the 3 scopes, thus identifying its most emitting items.



Scope 1 & 2 emissions combined for Wifirst were 110 tCO₂e over the year 2020. The company's vehicles are the main item representing the majority of its emissions. WiFirst's scope 3 emissions were 3,938 tCO₂e. Fixed assets of equipment are the main items representing 43.37% or 1,708 tCO₂e of these emissions.

Through its carbon footprint, Wifirst has quantified the carbon impact of its overall activity. It takes into account:



All these elements are part of scope 3, which «weighs» 36 times more than scopes 1 and 2 for Wifirst.

Wifirst has therefore implemented GHG reduction levers, namely:

- extending the life of the equipment,
- reconditioning equipment
- waste management with a view to recovering the material locally.

The carbon footprint for 2021 is currently being consolidated.

Wifirst has built a management system for its networks to cover Responsible Digital objectives. This revolves around five key areas:

- **Inform / train:** allow each stakeholder to understand the consequences and impacts of their actions;
- **Measure:** analyse environmental issues, feed energy/carbon databases and assess the results obtained;
- **Design:** integrate environmental impacts into network design and inform business responses to each situation;
- **Manage:** deploy sustainable networks and extend the life of equipment;
- **Optimise:** manage the circular economy life cycle of networks, recondition and recycle our equipment.

Stage	Objective	Medium	Action
1	Measure	Carbon model	Maintaining and refining our carbon database
2	Design	Design to carbon	Taking the carbon footprint into account in our sales responses
3	Organise	Anticipation of supplies	Prioritisation and routing of equipment via sea vs air
4	Manage	Equipment life management	Maintaining equipment in condition for as long as possible
5	Optimise	Reuse & recycling	Planning for the refurbishment and redeployment of decommissioned equipment



In 2021, Wifirst deployed its first site with its eco-responsible "Green WiFi" offer. This is based on the use of 100% refurbished professional equipment combined with the deployment of dedicated fibre. The goal is to save energy and budget for our clients by giving a second life to terminals that are previously used but in good condition. This type of sustainable WiFi will meet bandwidth needs while limiting the ecological impact of the network infrastructure, its added value residing in our know-how and in the software layer built by our R&D teams.

When it is not possible to reuse the equipment, we treat it in such a way as to respect the collection and recycling channels for WEEE (electronic and electrical waste). Wifirst has circular management of its materials by reconditioning them as soon as they can be re-used. By working on the return of equipment, we are implementing a circular eco-

nommy process and we are limiting our carbon impact by favouring local recycling centres when possible to:

- **Sort the equipment** - The equipment to be reconditioned has been identified and validated by the technical teams
- **Refurbish equipment** - A return process has been developed to ensure quality, thanks to suitable packaging and to facilitate the tracking and tracing of equipment.
- **Recycle obsolete equipment** - Local recycling centres have been identified to enable the recovery of materials and reduce the carbon impact linked to travel.



Conviviality



ANTI-CORRUPTION

PRINCIPLE

- **Principle 10:** businesses should work against corruption in all its forms, including extortion and bribery.

IMPLEMENTATION

Wifirst has implemented a responsible purchasing policy. In this context, it aims to mention the fight against corruption in contracts concluded with business partners.

A team bringing together the HR, finance, legal and CSR departments is responsible for deploying the compliance documents.



4. Measurement of results

This year, we have set out to identify the most relevant indicators for being a responsible and resilient company. We can already communicate some results but these are not exhaustive.

Commitments	Objectives	Performance indicators	2020	2021
Deploy a resilient infrastructure, by developing a sober digital infrastructure with a concern for eco-design and by promoting access to digital technologies.	Establish sustainable consumption and production methods by organising its client experience around transparency and developing its service offer around responsible digital technology.	Inform / train employees and clients. Deployment of the eco-responsible offer		Carbon training (internal) Climate fresco (internal) 3 x Witalk 1 st eco-responsible offer (Green WiFi)
	Fight against climate change by reducing its carbon impact.	TCO2/CA	Wifirst calculates its carbon footprint. Fixed assets of equipment constitute the main item representing 42.35% of these emissions. Its carbon intensity is 3 times lower than the average figure given by ADEME for the telecommunications sector	
		Tco2/Kapita		
		TCO2/GO		
		TCO2/Va		
		CO2 emissions of site visit vehicles		
	Deploy sustainable networks	Number of pieces of redeployed equipment	3,601	5,003
	Strengthen the circular economy	Number of pieces of equipment recycled as WEEE	/	/

Commitments	Objectives	Performance indicators	2020	2021
Employee well-being: being a responsible employer concerned about the well-being of its employees	Recruitment, management, training and internal development policy	Number of employees at 31/12	176	211
		Breakdown by type of contract at 12/31	Permanent contract: 94% Fixed-term contract: 6%	Permanent contract: 96% Fixed-term contract: 4% (work-study contracts)
		Number of hours of external training deployed	1,296 hours (of which 661 hours National Employment Fund)	1,165h
		Percentage of employees given a raise on return from maternity leave	N/A	100%
	Foster an inclusive culture	M/F equality index	61/100	74/100
		M/F breakdown at 31/12	21%	24%
	Ensure the well-being of employees through a healthy working environment	M/F breakdown of part-time employees	100% men	100% men
		Workplace safety training deployed	CACES R486B, electrician accreditation, working at height	CACES R486B, electrician accreditation, working at height

Employee wellbeing: being a responsible employer

Commitments	Objectives	Performance indicators
Economic practices that respect human rights: being a responsible partner with regard to clients, suppliers and subcontractors	Create a healthy ecosystem with all stakeholders	% of purchases from local companies
		% of purchases from companies that have adhered to our charter
		% of purchases from companies that are committed to CSR
		(indicator in the process of being defined)

Economic practices that respect human rights: being a responsible partner with regard to clients, suppliers and subcontractors

