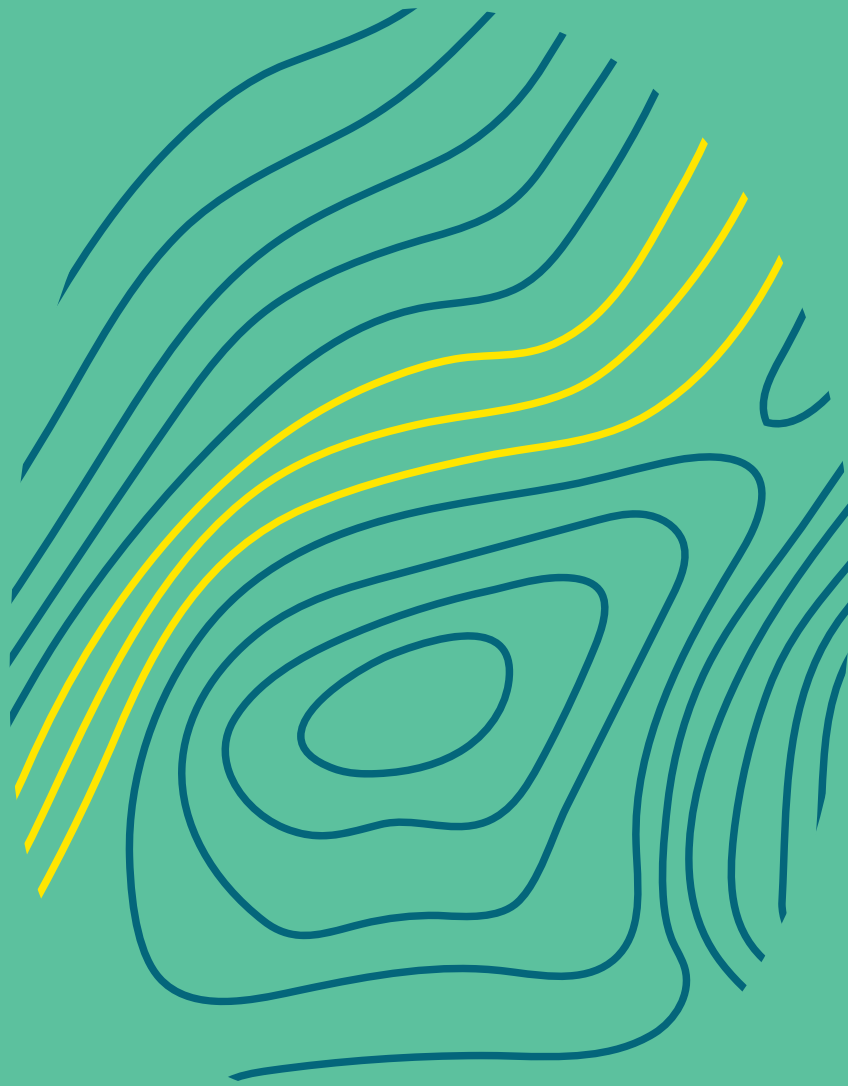


# Modern Slavery Report 2023





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As the president and chief executive officer of Orano Canada Inc., I am honoured to present our comprehensive report on our ongoing commitment to prevent modern slavery within our supply chain.

At Orano Canada, we believe that ethical business practices are the foundation of a sustainable and responsible organization. This report outlines the proactive measures we have implemented to ensure that our operations and partnerships adhere to the highest standards of human rights and labour practices.

By ensuring transparency, accountability, and continuous improvement, we are dedicated to creating a supply chain that is not only efficient and resilient, but also ethical and humane. Together, we can make a significant impact on the fight against modern slavery and uphold the dignity and rights of all individuals involved in our business activities.

Thank you for the opportunity to present our company's efforts in this critical endeavour.

Yours truly,

Jim Corman, President & CEO



## About this report

This report (the “Report”) contains information about Orano Canada Inc.’s (“Orano Canada”) operations that are required to be shared pursuant to section 11 of Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”) for the fiscal year ending December 31, 2023. The Act requires entities that meet its requirements to report on steps taken to counter and lessen the risk that modern slavery, including forced labour and child labour, is used within Canada by vendors or third parties within a Canadian entity’s procurement process, including services and/or goods sourced internationally.

## Orano Canada’s Structure and Activities

Orano Canada is a subsidiary of the French nuclear energy company Orano Group (“Orano” or the “Group”). Orano Canada is headquartered in Saskatoon, SK, and has been a leader in the exploration, mining, and production of Canadian uranium for over 60 years.

Our presence in Canada began with uranium exploration in the 1960s and the development of the Cluff Lake mine in the 1980s, and continued with mines and a mill at McClean Lake. Orano is also a partner in several other sites in the Athabasca Basin such as the Cigar Lake Mine, McArthur River mine, and Key Lake mill. Today, Orano Canada employs about 450 people in Saskatchewan, with many employees and contractors from northern communities.

## Orano’s Structure and Activities

Orano, a recognized international group in the field of nuclear materials, provides solutions to current and future challenges in the fields of energy and health.

Orano operates in 17 countries with a total of 17,500 employees worldwide, including 14,000 in France. Its revenue amounted to 4.775 billion euros for the year 2023. The Group generates 50% of its revenue outside France and 15% in Europe. Orano remains

inextricably linked to France and very committed to its local roots, with 17 industrial sites throughout the country.

The Group’s activities include in particular:

- the search for, extraction and concentration of uranium ore;
- uranium conversion and enrichment;
- the design and manufacture of nuclear fuel (MOX);
- processing and recycling of fuel and reusable materials;
- support and management of construction sites in a radioactive environment;
- packaging, warehousing and storage of nuclear materials;
- the dismantling and recovery of nuclear sites;
- logistics and transport in connection with previous activities; and
- innovative activities, notably in the fields of health and circular economy, including the development of a battery recycling business.

Orano has defined an organization in line with its industrial strategy on the basis of six business units (“Business Units”), each corresponding to a specific activity: mining, chemistry-enrichment, recycling, dismantling and services, nuclear packages and services, and projects. They all contribute to the generation of low-carbon electricity.

Furthermore, in order to offer the best quality products and services to its customers, Orano combines its technological expertise and know-how with the expertise of external companies and collaborates with the best competencies and practices to optimize the performance of its facilities, products and services. For instance, Orano optimizes the performance of its facilities and contracts with specialists in civil engineering, heavy object handling, remote operation, water and soil monitoring, *etc.* to benefit from specialized or rare expertise and resources.

The Group is structured into two levels: central management, which provides high-level guidance, minimum common standards, as well as business

support and control; and business units (“Business Units”), which manage operations and implement the Group’s industrial and commercial strategy in each of their areas of activity.

Orano operates within a dense and restrictive regulatory and normative framework with numerous obligations whose control and proper execution are ensured by various bodies and regulatory authorities, among which is the French nuclear safety authority (ASN).

Orano ensures the rigorous application of the provisions relating to human rights, fundamental freedoms, health, personal safety and environmental protection, in particular those provided for by French Law No. 2017-399 of March 27, 2017 (the “French Law”), on the duty of vigilance of parent companies and ordering companies (hereinafter, the “law on the duty of vigilance”). This care is an integral part of its corporate culture.

As a subsidiary of Orano, Orano Canada is also subject to the French Law. Orano requires its subsidiaries, including Orano Canada, to have strict compliance processes in place to ensure the French Law’s requirements are being satisfied. Orano requires Orano Canada to provide regular reporting on these processes, and it also conducts audits of those processes periodically to identify any deficiencies or gaps.

The current duty of vigilance plan was established in line with the plan published in 2022 and demonstrates the application of the French Law. It reflects the Group’s orientations expressed through its purpose and rolled out in its corporate project integratingsocietal and environmental commitments. This ambitious policy is structured around five strategic areas, the five “Cs”: Community, Climate, Competencies, Customer growth and Cash. It is available at the following address: [www.orano.group](http://www.orano.group).

## **Policies and Due Diligence Processes**

### **Methodology**

In order to define its duty of vigilance plan, the Group relies on strong ethical principles that have long underpinned its policy in terms of compliance, social and environmental responsibility and respect for fundamental rights.

As stated above, the regulated nature of its activities means that the Group is subject to strict prior authorization processes and controls by the competent authorities, which consider their possible impacts on employees as well as service providers, local populations and the environment. The Group is also bound by particularly high standards of ethics and corporate responsibility, set out in its Code of Ethics and Business Conduct (hereinafter, the “Code of Ethics”, available on the Orano Group’s website shown above).

The Group’s duty of vigilance plan is part of a continuous improvement process. It sets out identification, alert and monitoring procedures that have been in place within the Group for several years. It is drawn up with the Group’s Business Units, who also participate in its deployment. It is the result of close collaboration between various departments at both central and entity level, particularly in the areas of legal; health, safety, environment (HSE); corporate social responsibility (CSR); internal control and compliance; purchasing and human resources; and contains reasonable duty of vigilance measures.

The concerned departments have participated, each in their areas of expertise and depending on the nature, scope and location of their activities, in the identification and prioritization of risks first, then in their anticipation and the definition of appropriate mitigation and prevention measures, as well as their implementation and monitoring of their effectiveness.

Risks are identified and prioritized according to the Group’s risk mapping methodology, which identifies external and internal risks, strategic risks, financial and operational risks, risks to social and environmental responsibilities, and risks related to ethics, governance, compliance, and integrity. Using multi-level, organizationally integrated reviews, risks are analyzed by their occurrence and impact.

The close collaboration between the teams was confirmed by the creation in 2023 of a Vigilance Committee composed of representatives of the HSE, Risk, Supply chain, Compliance and Internal Audit Departments, which is chaired by the Legal Department. This committee's responsibilities include consolidating the information provided by the Business Units, approving the drafting of the duty of vigilance plan, reviewing it and monitoring it. This committee also defines annual action plans and helps develop the duty of vigilance culture within the Group. The elaboration of this chapter has also been facilitated by the use of a dedicated software tool to rationalize the information collected throughout the Group, and centralize the drafting of this document.

The duty of vigilance plan is also the result of discussions with internal and external stakeholders to which the Group is committed. As part of its activities and the implementation of its preventative actions, Orano maintains an ongoing dialogue with its stakeholders in France and abroad. This includes customers and partners, employees and their representatives, administrations and authorities, shareholders and investors, elected officials and state representatives, subcontractors and suppliers, as well as with local residents. These exchanges take place through various modes of dialogue and interaction, including participation in discussion forums, visits to industrial sites, participation in supplier associations, meetings, local sessions and national debates, etc. The Group's 2023 duty of vigilance plan is structured around five sections that reflect the structure of the law. It reflects the measures taken by the Group related to:

- the identification by the Group of risks of serious harm;
- the deployment of risk prevention measures;
- the assessment of its subsidiaries as well as subcontractors and suppliers with whom the Group has an established commercial relationship;
- the implementation of a whistleblowing system to report and process any alerts brought to the attention of the Group; and
- the verification of the effective implementation

of the announced duty of vigilance measures.

## **Identification of the risks of breach of duty of vigilance likely to be generated by Orano's activities**

Orano carries out its activities and ensures that each of its employees, suppliers and subcontractors carries out its activities in accordance with internationally recognized human rights, in particular:

- the Universal Declaration of Human Rights adopted by the UN in 1948;
- the principles of the UN Global Compact;
- the fundamental conventions of the International Labour Organization (ILO); and
- the Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises.

The application of these reference texts by Orano reflects the Group's commitment, in particular to the elimination of child labor and all forms of forced or compulsory labor, respect for free association, privacy and the right to collective bargaining, non-discrimination and any other form of infringement of fundamental freedoms.

In addition to these foundation texts, Orano supports concrete initiatives promoting socially responsible practices and the protection of the environment in addition to measuring the performance of its actions by complying with:

- the Extractive Industries Transparency Initiative (EITI); and
- the principles of the Global Reporting Initiative (GRI).

The Group's activities may present risks to its environment and ecosystem. It is its responsibility to identify them, prioritize them, analyze them and define effective measures to limit their occurrence and scope.

The risks of serious harm as provided for by the law on the duty of vigilance are integrated into the Group's existing risk management and control systems and are included in the Group's risk mapping processes.

The risk mapping identification process was carried

out taking into account the BRM (Business Risk Model) risk management methodology and the evolution of the risk management process.

Regarding the application of the French Law on the duty of vigilance, risks can be grouped into the following three main categories:

- risks to the health and safety of people;
- risks in terms of safety and environmental damage, whether related to potential environmental impacts resulting from the Group's activity or caused by a serious accident; and
- the risks of infringement on human rights and fundamental freedoms, whether they concern the Group's employees (issues of discrimination and discriminatory behavior or moral and/or sexual harassment), the communities living near the Group's sites, or whether they are caused by suppliers or subcontractors with whom there is an established commercial relationship (in the context of forced labour or child labour).

## **Forced Labour and Child Labour Risks**

### **Human rights**

As the Group's activities and those of its suppliers and subcontractors are carried out in various regions of the world, Orano could be exposed to risks of violations of human rights and fundamental freedoms, involving third parties with whom direct or indirect links can be established.

These breaches could concern:

- forced labor;
- children's rights;
- discriminatory working conditions;
- the rights of local communities living near the sites;
- interference with freedom of association and the right to collective bargaining; and
- respect for private life.

In particular, they could take place in certain regions close to conflict zones or areas in which human rights are not respected.

## **Remediation Measures**

### **Prevention of the risks of infringement of human rights and fundamental freedoms in France and abroad**

In all the regions where Orano operates, increased vigilance is applied to the prevention of serious violations of human rights and fundamental freedoms. This includes the health and safety of people and the environment, for the activities of the Group, companies that it controls, directly or indirectly, within the meaning of Article L. 233-16 of the French Commercial Code, as well as for the activities of subcontractors or suppliers with which Orano has an established commercial relationship.

This prevention takes place in active and close consultation with its ecosystem and the stakeholders with whom the Group maintains a constant dialogue. It extends over a broad scope that covers subjects as a whole.

Among the risks of human rights violations identified, Orano's Code of Ethics includes a strict ban on forced labor and respect for the fundamental rights of children and requires its suppliers to adhere to it.

The whistleblowing mechanism is available and gives all employees, as well as third parties, the opportunity to report any discrepancies that may be observed.

In 2023, the Group adopted a Human Rights policy that was validated by the Executive Committee. The result of close collaboration between the various departments, it will be gradually rolled out across all Group entities and included in the documents provided to suppliers and subcontractors. It expresses Orano's desire to conduct its activities in strict compliance with internationally recognized human rights and to demand respect for these rights in its business relationships.

In principle, the Human Rights Policy defines the Group's commitments to respecting the fundamental rights and individual freedoms of its employees, applying the highest standards of health and safety, managing resources responsibly

and preventing any negative impact its activities may have on the rights of local communities living near its sites.

The Group has created a risk management system consistent with the recommendations of the Autorité des marchés financiers (AMF), the professional standards of the Committee of Sponsoring Organizations of the Treadway Commission (COSO), and the changes in law and regulations concerning the non-financial performance statement and the duty of vigilance.

A risk-assessment campaign is undertaken annually to take into account the potential impact of events on the achievement of the Group's strategic and operational objectives. Its main objectives are:

- the formal identification of every type of risk;
- the analysis and assessment of these risks in order to prioritize them; and
- the definition and monitoring of the implementation of action plans to control them.

The Risk Management Division of the Risk, Compliance, Internal Audit Department reports to Group's Executive Management team and develops the methodological tools shared throughout the Group. Risks are identified using a Business Risk Model (BRM). The BRM categorizes all foreseeable or unforeseen, internal and external situations or events into 38 risk families. It includes:

- macro and external risks such as climate change or geopolitical risks;
- strategic risks related, for example, to competition or partnerships;
- financial risks;
- operational risks;
- risks related to the Group's social, societal and environmental responsibility; and
- risks related to ethics, governance, compliance and integrity in business practices, including but not limited to forced labour and child labour.

The BRM is designed to evolve over time by incorporating best practices and feedback from users, and changes made to regulations. Since 2018, the Group's BRM has included the duty of vigilance and the risks associated with corruption

and influence peddling, with, since 2022, an in-depth analysis of the risks related to the Group's social, societal and environmental commitment.

The Head of the Risk Management Division within the Risk, Compliance, Internal Audit Department, in collaboration with the Risk Managers of the Business Units (each of which has a network of Risk Managers in their operating entities, including Orano Canada), coordinates the deployment of the risk mapping process, and consolidates the risk assessment at Group-level. The risks identified are analyzed and ranked on three axes: impact, likelihood and degree of control. By producing this map, elements of proposals and decisions can be compiled on the implementation of action plans intended to reduce risks to an ALARP (As Low As Reasonably Practicable) level.

The operational units have the responsibility of identifying, analyzing and prioritizing their risks and then managing them by implementing action plans, allocating the appropriate resources and monitoring their proper execution and the effects of these action plans on risks.

The Risk Management Committee coordinates, for all operations and on a worldwide basis, the analysis of the Group's key risks and the follow-up on the action plans necessary to limit those risks. As part of its mission, the Risk Management Committee makes use of all of the expertise of the Group. Its composition brings together the key functional areas in the Group that can provide special expertise or knowledge, enabling it to assess the criticality of the risks and their potential consequences.

Together with the Risk Management Committee, the members of the Executive Committee identify and formalize the list of the Group's major risks and appoint, for each risk, a designated member. More specifically, the latter is responsible for ensuring that there are appropriate action plans and for reporting on their progress to the Risk Management Committee. The mapping is presented annually to the Audit and Ethics Committee of the Board of Directors.

## Subcontractors and suppliers: selecting responsible partners

Due to the nature of Orano's business operations, the main risks relating to the supply chain to which the Group could be exposed are identified in the following areas:

- occupational health and safety;
- nuclear safety and the environment;
- delays or drift in the costs of industrial projects or commercial contracts;
- fraud, corruption and lack of quality; and
- human rights and fundamental freedoms.

The Group's purchasing activities are governed by the Group's purchasing and supply chain process. The actions taken and the measures taken by the Group to identify, prevent and reduce the risks of serious harm to health, safety and security, the environment and human rights and fundamental freedoms are detailed in the duty of vigilance plan.

As part of its activities, Orano combines its expertise with the know-how and competencies of external companies, with which it ensures a close relationship. These external contributors, who may be involved in an activity at an Orano site or be providing a service, help to control technological risks and contribute to the Group's industrial and economic performance.

## Enhanced information and regular discussions

Orano oversees their involvement and provides them with enhanced information.

In 2023, a meeting was organized by the Chemistry-Enrichment Business Unit with its main suppliers and operational teams (project managers and representatives of the Purchasing Department in particular) to raise their awareness of the industrial challenges of ongoing and future operations covered by the Business Unit. This meeting gave rise to numerous discussions, demonstrating the strong involvement of external service providers.

In addition, Orano maintains regular local discussions with its service providers and suppliers

on the implementation of its industrial policy.

The Group's corporate Supply Chain Department attaches particular importance to the selection of its partners and subcontractors. It works closely with the Quality, HSE, Legal, and Compliance Departments to ensure that suppliers comply with benchmarks such as ISO 9001, ISO 14001, OHSAS 18001, the regulations on regulated nuclear facilities (INB Decree) and the compliance requirements related in particular to the prevention of corruption and influence peddling and those related to the application of the law on the duty of vigilance.

Subcontractors and suppliers of Orano are required to comply with the Group's Code of Ethics and its general purchasing terms and conditions (hereinafter the "GTC") derived therefrom, failing which the contractual relationship may be terminated.

The Group's Code of Ethics specifies the essential values to which the Group adheres and shares with its service providers and suppliers. It is regularly updated to take account of changes in the national and international environment in which the Group operates. With regard to the GTC, they set out the obligations and provisions to be complied with in terms of (i) hygiene, safety and protection of human health, (ii) compliance with the environment and sustainable development and (iii) management of chemical substances regulated by the European REACH (Registration, Evaluation, Authorization and Restriction of Chemicals) regulations. They are incorporated into all contracts entered into with suppliers, it being specified that in the event of negotiations to adapt the GTCs to certain specific contracts, particular attention is paid to ensuring that the fundamental principles from which the Group does not derogate are included in the special conditions.

Orano is committed and also imposes a clear commitment on its suppliers and subcontractors in the defense of the principles of the UN Global Compact, the OECD guidelines for multinational companies and the Extractive Industries Transparency Initiative (EITI), in addition to adhering to the Sustainable Development Commitment which it has adopted.

Since December 2, 2021, Orano has also been a signatory of the "Responsible Supplier Relations



Charter” (available at: <http://www.rfar.fr>) and by being a signatory demonstrates its desire to implement a continuous improvement plan with its suppliers within a framework of mutual trust and respect for the rights and responsibilities of each individual. The charter is broken down into ten commitments whose aim is to establish responsible business practices between customer/supplier partners that are conducive to the development of a sustainable relationship.

This commitment is supplemented by the appointment of an internal mediator within the company who can be referred to by the Group’s suppliers when a situation has not been resolved through amicable negotiation, reachable at an email address that is available on the Orano website (under the “Supplier Relations” section) since 2022.

## A demanding and informed choice of suppliers and subcontractors

In order to make an informed choice of suppliers and subcontractors, the Supply Chain Department selects its suppliers and subcontractors according to demanding criteria. It is based on the methodology developed by the Risk, Compliance and Internal Audit Department, and takes into account tender criteria (compliance with technical, quality, economic and HSE criteria), the associated risk mitigation plan prior to contract award (through selection criteria and supplier qualification audits, and monitoring programs during contract execution), as well as supplier performance measurements and required improvement plans. Ethics and compliance aspects, as well as the commitment to sustainable development, are also included in the contractual clauses. The Group’s Economic Intelligence division also carries out studies, in particular for SOC (Sourcing Opportunities Countries) suppliers.

These criteria may be adapted in the Business Unit according to the specific nature of its activities.

Furthermore, in order to identify the suppliers and subcontractors that may potentially present risks, the Group uses three basic criteria:

- the volume of annual purchases made with the supplier or subcontractor;
- the business segment; and

- the geographic location of the activity.

The regular review of third-party subcontractors and suppliers thus enables better prevention of compliance, non-financial risks and risks related to the duty of vigilance, as well as the reporting of weak signals. The health crisis in 2020 and 2021 also gave rise to a support plan for sensitive suppliers. This approach was strengthened in 2022 with the implementation of the monitoring of the Group’s critical/sensitive suppliers.

In accordance with the procedure for assessing third-party compliance, which was rolled out together with the Risk, Compliance and Internal Audit Department, any new supplier or any material change in a supplier relationship must be specifically verified and adapted according to the estimated level of risk. The third-party compliance assessment procedure provides for a certain number of systematic checks for new Tier 1 suppliers and subcontractors. Depending on the results obtained, a questionnaire may be sent to the supplier and if necessary, the Economic Intelligence division may carry out an investigation covering the risks referred to in the duty of vigilance plan. This study is systematically carried out for suppliers with a medium or high level of risk. This process ensures that potential compliance risks have notably been identified and that appropriate mitigation measures are implemented.

## Ethics and Compliance

Orano seeks to continue being an international leader in terms of ethics and compliance. As a responsible company, Orano acts according to two principles considered as priorities:

- compliance with the most demanding requirements commensurate with the challenges in terms of safety and security in the conduct of our activities, as well as for the protection of health and the environment; and
- compliance with the strictest standards of integrity and an unwavering commitment to fight against corruption, fraud, including quality fraud, financial fraud, embezzlement and misappropriation of funds, money-laundering and anti-competitive practices.

The Code of Ethics was updated in 2022 and published in the Group's nine languages and then incorporated into the internal regulations of entities in France, or equivalent outside France. The values shared by all are defined therein, in line with the Group's purpose and commitment strategy. The Group's Code of Ethics sets out the principles and rules to be followed to uphold these values on a daily basis. It reflects the Group's culture and its commitments to all stakeholders, particularly in favor of sustainable development and respect for Human Rights. It serves as a reference for all employees and managers, setting out expectations and standards. It extends to subcontractors and suppliers through the signing of a sustainable development commitment applicable to suppliers.

## A comprehensive compliance system

Compliance is the system designed to ensure that Orano controls the risks of:

- non-compliance with laws and regulations;
- non-compliance with industry standards; and
- non-compliance with the Orano Code of Ethics, compliance policies and procedures.

The risks of non-compliance may impact the safety of employees, working conditions, the financial position or the reputation of the Group or an entity. They may result in legal, administrative, or disciplinary sanctions. The compliance system is based on the governance, processes and internal control environment set up in the organization in each area.

## A robust anti-corruption and prevention of influence peddling program

A robust anti-corruption compliance program is deployed at the level of Group-controlled entities and regularly updated. The program promotes a culture of business ethics and transparency through a robust prevention policy based on strict rules of conduct as well as training and awareness-raising actions. Transparency, sincerity, and openness to dialogue accompany this program throughout its implementation, including its supervision by the Board of Directors, the Chief Executive Officer and the Executive Committee.

Based on its corruption and influence peddling risk mapping, which is updated each year, and in compliance with the French Sapin II law, Orano established a corruption and influence peddling prevention program. The program is overseen and

implemented by the Compliance division of the Risk, Compliance, Internal Audit Department, assisted by a network of compliance correspondents. This program is intended for all Group employees, managers, and executives and is based on the appropriation and application of rules of conduct, internal policies and procedures, and external laws and regulations.

The corruption prevention and detection program is organized around eight pillars:

- the corruption and influence peddling risk mapping, updated annually;
- the Code of Ethics, including the anti-corruption rules of conduct and documentation on related policies and procedures;
- raising awareness among staff in general and targeted training for those exposed;
- the assessment of the compliance of third parties in direct contact with the Group;
- the accounting controls and the internal control environment;
- the whistleblowing system, which makes it possible to report suspected acts of corruption or influence peddling;
- the disciplinary regime, with a principle of zero tolerance in the event of proven acts of corruption by the Group's employees; and
- the evaluation and control plan for the entire program, aimed at identifying discrepancies and carrying out corrective actions.

This program is part of a continuous improvement approach with regard to the assessment of identified risks, changes in indicators and the results of controls. It relies in particular on a network of around 30 compliance correspondents and compliance liaisons covering all the Group's activities, and on regular communication with operational staff.

## Appropriate governance

The Compliance Committee, chaired by the Risk, Compliance, Internal Audit Director, supervises the implementation of the compliance system and issues opinions and recommendations on third-party compliance assessments (under the French Sapin II law). It is comprised of permanent members and permanent invited guests from the central

departments. Depending on the topics, the compliance correspondents and operational staff concerned are invited to Compliance Committee meetings. This Committee met 32 times in 2023.

The compliance correspondents, appointed by their management, convey and deploy internal ethics and compliance policies and rules within the entities. They participate in the development of systems to control the risks identified and the operational implementation of action plans. In order to continue its approach of improvement and proximity with operational staff, the Compliance Division of the Risk, Compliance, Internal Audit Department organizes and coordinates around 30 compliance correspondents who make up the compliance network. In 2023, eight compliance network meetings were held. Finally, the Group's managers play a key role in their teams' commitment to implementing the program and to its day-to-day deployment.

## Risk mapping updated each year

A risk assessment campaign is launched annually to take into account the impact of potential events on the achievement of the Group's strategic and operational objectives. Its main objectives are:

- the formal identification of every type of risk;
- the characterization of these risks in order to prioritize them; and
- the definition and implementation of action plans to control them.

The risks associated with corruption and influence peddling are included in a specific risk mapping as part of the Group's overall risk analysis according to three criteria: severity, occurrence, and level of control. The purpose of this map is to identify and prioritize risks according to the activity, geographical region, and processes concerned. It allows the compliance program to be adapted to the risks to which the Group is exposed. The action plans and their prioritization are defined on the basis of this mapping. The update is managed by the Risk, Compliance, Internal Audit Department.

The results are presented to the Executive Committee and to the Audit and Ethics Committee. In 2023, the mapping was updated. This exercise is based on a methodology developed by the Group. For each Business Unit, corporate department and

the entities concerned, it consisted in identifying the risk scenarios according to 12 defined sub-families of generic risks and based on the previous mapping, processes, and history of the Group.

On the basis of these maps, which are reviewed by the Compliance Committee, a summary highlighting the exposure areas and action plans is presented to the Executive Committee and the Board of Directors' Audit and Ethics Committee for validation.

## Third party compliance assessments

Business relationships with third parties (clients, intermediaries, suppliers, service providers, consultants, *etc.*) may incur risks of corruption and influence peddling. In order to prevent these risks, and in keeping with changes in the French Sapin II law (anti-corruption and prevention of influence peddling) and the duty of vigilance law, the Group carries out appropriate checks on the integrity of third parties with a view to establishing ethical and long-lasting partnerships. Depending on the level of *a priori* risk assessed according to the criteria resulting from the mapping, including the geographic location and industry of the third party, prior history or relationships with Orano, media controversy, human rights abuses, and any applicable sanctions to the third party, additional checks may be carried out, both internally and with the third party concerned, or *via* external sources. Where additional checks are required, Orano's dedicated Economic Intelligence team, reporting to the Protection Department, conducts economic intelligence analyses to ensure conformity with the Group's compliance standards.

The Compliance Committee ensures that, for all business relationships with potentially high-risk third parties, the risks of non-compliance with the Group's standards, particularly with the regulations on corruption, money laundering and international rules on sanctions, are identified and managed wherever possible, to ensure informed operational decision-making. It issues opinions and recommendations on the planned or current relationship with the partner in question.

For more details on the third-party compliance assessment system see the Orano supplier portal: <https://www.orano.group/en/group/suppliers-relations/>.

## Regular risk assessment

To assess and manage the aforementioned risks, the Group relies on various organizational and management procedures aimed at ensuring, among other things:

- compliance with standards and regulations;
- control of design;
- industrial risk management;
- health and environmental management;
- management of industrial purchases;
- analysis and processing of incidents and accidents; and
- the distribution of shared technical standards across the Group's entities;

the application of which is the responsibility of departments of the Group's various entities.

In this context, the Group audits its suppliers to verify that the operations they carry out comply with Orano's requirements.

Examples include safety reviews prior to the start-up of any new production unit, to prevent an accident related to a construction defect, technical audits to ensure compliance of operations with the Group's rules, as well as inspections of industrial sites. This regular assessment of industrial risks that could affect people covers all of the Group's activities in all geographical areas.

## Controls of suppliers and subcontractors

As stated earlier, suppliers are required to commit to Orano to respect and promote the protection of human rights, labor law (labor standards, fight against child labor, fight against discrimination, respect for legal working hours, respect for the minimum wage) and the environment. They are also required to implement safety and security mechanisms, with each supplier committing to continuous progress in these areas.

The Group's GTC include specific provisions such that Orano, where applicable, its customer, and any third party commissioned by Orano or any duly empowered authority shall have access to the premises of the supplier or subcontractors for the purpose of inspections or audits of all the

requirements specified in the order. In the same way, Orano reserves the right to verify, at any time, the compliance of its suppliers' and subcontractors' practices with the Code of Ethics, it being understood that non-compliance with the provisions of the GTC may result in the termination of the order.

Strategic suppliers may be audited by each of the Business Units concerned. The contracts are then reviewed with the suppliers, with the issue, where applicable, of complaints and the application of penalties. For example, within the Nuclear Packages and Services Business Unit, the transport supervision unit carries out on-site visits as well as numerous inspections (planned and unannounced) and the CAFs (Manufacturing Business Managers) monitor the manufacture of packaging, directly at the supplier's premises. In accordance with the order on regulated nuclear facilities (INB), Orano's various Business Units monitor their service providers, duly inspected by the authorities, in a proportionate manner.

## Responsible Purchasing and Supply Chain Process

The Group's purchasing activities are governed by the Group's purchasing and supply chain process. Suppliers are assessed and monitored as regards their reliability, quality, compliance, financial strength, competitiveness, health, safety, environmental performance, and their ability to provide products and/or services that are compliant with the specified needs and requirements.

## Purchasing policy and integration of social and environmental criteria

The Group formalized a purchasing policy, which was revised in 2018. The Orano documentary framework for subcontracting and purchasing includes the following documents:

- a purchasing policy and an intragroup purchasing policy;
- a supply chain manual covering all purchasing processes and procedures;
- Group procedures that formalize the integration of safety and security (HSE) criteria in the purchasing process; and

- general purchasing terms and conditions (GTC).

The purchasing manager and the specifier must consider the economic and ethics aspects and fair competition practices, and value the suppliers and offers that are the best in terms of the organization. When identifying needs, they must factor in the local situation, the impact on jobs, and the local economy.

## A rigorous purchasing and supplier assessment process

The Group's purchasing activities are governed by the Group's purchasing and supply chain process.

Suppliers are assessed and monitored according to the criteria of safety, quality, compliance, financial soundness, competitiveness, health, security, environmental performance, and their ability to provide products and/or services that are compliant with the specified needs and requirements.

The Corporate Supply Chain Department works closely with the Group's Quality, HSE, Legal, and Compliance Departments to ensure that suppliers comply with benchmarks such as ISO 9001, ISO 14001, OHSAS 18001, and the regulations on regulated nuclear facilities (INB Decree) or the compliance requirements related in particular to the prevention of corruption and influence peddling.

To adapt the responses to the risk levels, Orano has divided the markets into three categories using a "hazard analysis." Suitable risk criteria have also been defined as regards compliance and anti-corruption. The level of the activity's risk determines the list of suppliers invited to bid and the measures to be taken for contract follow-up and operational supervision to ensure the control of subcontractor safety, health, security, the environment, and sustainable development requirements. Moreover, the purchasing manager and the specifier must factor in the economic and ethics aspects, as well as fair competition practices, specifically by:

- promoting competition, plurality of responses, and the emergence of alternative offers;
- allowing all companies matching the bid requirements to respond without discrimination;
- applying the reciprocity principle, *i.e.*, requiring of suppliers what the organization requires of

itself; and

- valuing the suppliers and bids that are the best fit with the organization's activities. When identifying needs, they must factor in the local situation, the impact on jobs and the local economy and social criteria when adapted (such as during calls for tenders for class 1 markets).

Orano decided to strengthen the societal and environmental criteria in the supplier selection process during 2021.

Since December 2, 2021, Orano has also been a signatory of the "Responsible Supplier Relations Charter" (<http://www.rfar.fr/>) and in this respect demonstrates its desire to implement a continuous improvement plan with its suppliers within a framework of mutual trust and respect for the rights and responsibilities of each individual.

This commitment is supplemented by the appointment of an internal mediator within the Group, who can be referred to by the Group's suppliers when a situation has not been resolved through amicable negotiation. The internal mediator's mission is to find a concerted solution that suits both parties. The mediator can be contacted by email via the Orano website (see the "supplier relations" page).

The action plans of Orano's supply chain thus include objectives contributing to Orano's CSR commitment approach as well as, for 2022, the identification of the means to achieve the 2030 target for scope 3 greenhouse gas emissions reductions.

## Commitment to Sustainable Development including in the General Purchasing Terms and Conditions (GTC)

Orano wishes to engage its suppliers in its efforts toward sustainable development. For several years, Orano has included provisions concerning suppliers' observance of this commitment in 100% of its contracts and general terms and conditions of purchase.

Under the terms of this commitment, suppliers agree to promote respect for human rights, labor law (work standards, child labor, discrimination, working hours and minimum wage) and the

environment, along with a nuclear safety and security system.

Each supplier also agrees to make ongoing efforts toward progress in these areas, including corruption prevention, efforts which are taken into account when being listed as an Orano supplier.

An integral part of all contracts signed with suppliers, the GTC set forth the obligations on suppliers as to hygiene, safety and health protection, as well as respect of the environment. They include provisions concerning the obligations the provider must respect in terms of:

- hygiene, safety, and protection of health;
- regulated substances (REACH regulation); and
- sustainable development relating to human rights, health, safety, labor law, and the environment.

Non-compliance with these provisions may result in the termination of the contract or order.

The GTC include provisions such that Orano, where applicable, its customer, any third party commissioned by Orano or any duly empowered authority shall have access to the premises of the supplier, its subcontractors, and suppliers for the purpose of inspections or audits of all the requirements specified in the order.

## Sapin II law and duty of vigilance

Orano's Supply Chain Management System integrates the duty of vigilance and corruption prevention plan into these processes, including RFI/RFQ and supplier evaluation and monitoring. The various documents and processes making up the supply chain management system (Code of Ethics, GTC, Purchasing Policy, sustainable development commitment, etc.) take into account:

- the risk analyses by purchasing market ("Hazard Table") and by country;
- the plan for mitigating the associated risks before awarding contracts (through supplier selection criteria and qualification audits, and monitoring programs during contract fulfillment);
- the supplier performance metrics and the required improvement plans;

- the ethics, sustainable development commitment, and corruption prevention aspects in contract clauses, in compliance with the French Sapin II and corporate duty of vigilance laws; and
- the studies carried out by the Group's Economic Intelligence division and a compliance questionnaire for certain suppliers, in accordance with the third-party compliance assessment process.

In accordance with the procedure for assessing third-party compliance, which was rolled out together with the Compliance Department, any new supplier or any material change in a supplier relationship must be specifically verified and adapted according to the estimated level of risk with regard to reputation.

In order to enable the identification and processing of events that breach the regulations or the Orano Code of Ethics, the Orano ethics alert system portal is also open to the staff of suppliers, service providers, and subcontractors.

## Remediation of Loss of Income

Orano Canada has determined that, to the best of its knowledge, vulnerable families have not experienced loss of income as a result of steps taken to eliminate forced labour or child labour risks. Therefore, no measures have been implemented in this area.

## Training

### **Orano ensures the training of its employees and operates a process for collecting and processing alerts**

Orano complies with the provisions of the law on the duty of vigilance and has deployed a training system for its employees and a mechanism for collecting alerts.

### **Orano raises awareness, trains its employees, and participates in the training of its suppliers**

The Orano Code of Ethics is distributed to all employees to raise their awareness about the Group's values. This Code is available on the

Group's website and intranet and can be downloaded in nine languages. All new employees are required to read it and may refer to it in the event of a situation that appears to be contrary to the principles set out in the Code, whether it is a matter of human rights or other values whose protection is promoted by the Group.

Orano has also set up a 30-minute e-learning module called "Our Code of Ethics" that is dedicated to the proper application of the Code of Ethics and Business Conduct and the Group's rules of conduct, including a knowledge validation test. During their annual review with their manager, employees formally confirm their commitment to respecting the rules of the Code of Ethics, as well as the completion of the online training.

In addition, Orano trains its employees in safety rules through mandatory training specific to each site. In addition to this specific training, there are also mandatory modules to train employees in the implementation of a corporate culture in terms of protection and safety. These e-learning modules have been set up to raise employee awareness and enable them to adopt the appropriate behavior and avoid at-risk situations.

Actions to raise awareness and share feedback on anti-corruption and conflicts of interest are regularly rolled out to all Orano Mining employees, at all its sites worldwide, including Orano Canada.

Orano also raises employee awareness of climate change issues. For example, since 2021, nearly 600 managers have been trained in addressing such issues, including all of the Group's Management Committees.

In 2023, Orano trained 250 supply chain participants in the challenges of climate change and the importance of reducing scope 3 greenhouse gas emissions. The Group also held 30 meetings with its main contributing suppliers to discuss Orano's objectives and their actions. The sustainable development commitment applicable to suppliers was updated and sent to 500 of the Group's suppliers.

In addition, Orano ensures that external

stakeholders are aware of risks and their prevention, particularly in terms of safety and security.

Each of Orano's operating units has its own training guidelines for understanding and preventing the risks found in its facilities and/ or activities, which vary depending on the activity, facility and site.

Each Orano site or facility provides "safety induction training" for employees of outside contractors who are due to enter the site. During the training, which varies in format and duration, the following are presented:

- the site;
- activities;
- facilities;
- the processes and materials used;
- major risks and associated prevention measures;
- principles of nuclear safety and security; and
- certain safety culture fundamentals.

The training includes a multiple-choice test to assess the knowledge acquired. A minimum score is required to validate the training. Validation is a condition for obtaining access authorization by issuing a badge.

## Employee Ethics Training

Employee training is an essential lever for spreading a culture of integrity and transparency within the Group. Orano is committed to ensuring that all of its employees receive regular training on these topics. In order to ensure a good understanding of the ethics rules, the Compliance Department defines and manages the deployment of an annual awareness-raising and training plan concerning anti-corruption and the prevention of influence peddling, in coordination with the Compliance Network and Human Resources. The program includes:

- e-learning modules dedicated to the rules of the Code of Ethics, ethics, and the prevention of corruption, for all Group employees; and
- general and specific face-to-face and virtual classroom training (anti-corruption and prevention of influence peddling and the Orano anti-corruption program, accounting controls for people working in finance, specific modules on request).

Compliance correspondents also provide training for personnel exposed to the risks of corruption in their organization with the support of the Compliance Department, which provides a training pack enabling correspondents to understand and then roll out the training. Focus sessions are also organized as needed. The members of the Executive Committee and the Audit and Ethics Committee are regularly briefed on compliance issues.

## Annual Ethics Report

Each year, Executive Management asks the managers of units or subsidiaries in France and abroad to prepare an ethics report listing, *a posteriori* and in a summary and anonymized manner, the ethics incidents of which they have become aware, and the points of vigilance. Ethics incidents include events contrary to the Code of Ethics that have occurred during the past year, including any events giving rise to an ethics alert, while the points of vigilance include situations or risks that could give rise to an ethics incident. The trend in recent years shows that the topic with the most incidents is "discrimination and harassment". An annual summary of alerts and incidents is presented to the Executive Committee and the Audit and Ethics Committee.

## System for processing alerts

The Group's ethics whistleblowing system is a secure reporting portal accessible at the following address: <https://oranoethic.signalement.net>. It is open to any individual, employee or external to the Group.

It covers all the topics of the Code of Ethics and in particular the topics of the French Sapin II law and the law on the duty of vigilance. It also guarantees confidentiality in the processing of information and the protection of whistleblowers acting in good faith.

To strengthen the relationships of trust established with stakeholders and populations living near its sites, since 2020 Orano's mining Business Unit ("Orano Mining") has operated a new complaints handling system at all its sites. It enables any person to express their fears, observations, comments or questions and to obtain a response within a given period. This mechanism, co-developed with the sites, demonstrates Orano Mining's respect for the concerns of local stakeholders and the group's desire for transparency. This system is promoted

during meetings with stakeholders, via social networks or on the country website, for example in Canada. Each year, Orano Mining reports on the number of complaints recorded in its CSR report (available on the Orano website [www.orano.group](http://www.orano.group))

## Assessing Effectiveness

The law on the duty of vigilance requires the publication of a report on the effective implementation of the duty of vigilance plan for the previous financial year.

The Group has various monitoring systems in place to ensure the effective deployment of the measures set out in the duty of vigilance plan, which cover all of its activities as well as those of the subsidiaries that it controls within the meaning of the law of March 27, 2017. For example, in terms of nuclear safety, the annual report of the General Inspectorate published on the Group's website lists significant nuclear safety events.

In 2023, with a view to continuous improvement of its control processes, the Group initiated a number of approaches and actions to automate the collection of information on its suppliers and services.

The table below shows the Group's main indicators in terms of health, occupational safety, nuclear safety, environment, human rights and fundamental freedoms, and responsible purchasing. The data correspond to the Group's reporting scope.



**MAIN INDICATORS RELATED TO THE DUTY OF VIGILANCE PLAN**  
**HEALTH – OCCUPATIONAL SAFETY**

Indicators	Reference 2019	2021	2022	2023	Comments
<b>Results indicators</b>					
Accident frequency rate with lost time (excluding commuting accidents)	1.8	1.5	0.9	1.2	-
Number of fatal accidents among Orano employees	0	0	0	0	-
Number of fatal accidents among external companies	1	1	2	0	-
Average exposure of employees to radiation over 12 consecutive months (mSv)	0.84	0.86	0.78	0.59	To be compared with the maximum additional authorized exposure for the public of 1 mSv
Average exposure of subcontractors to radiation over 12 consecutive months (mSv)	0.5	0.65	0.57	0.69	To be compared with the maximum additional authorized exposure for the public of 1 mSv
<b>Means indicators</b>					
ISO 45001 - OHSAS 18001 certifications *	No t obtainable	23	22	22	-

\* Indicator reported for the first time in 2020.

**NUCLEAR SAFETY – ENVIRONMENT**

Indicators	Reference 2019	2021	2022	2023	Comments
<b>Results indicators</b>					
Level 2 or higher	0	0	0	0	-
Event Prevention Rate (EPR)	0.05	0.05	0.02	0.05	-
Industrial Risk Event Prevention Rate (EPR IR)	-	0.11	0.02	0.01	-
Scopes 1,2 and 3 GHG emissions (tCO <sub>2</sub> e)*	1,938,474	1,886,289	1,964,588	2,084,437	-
Quantity of energy consumed ** (MWh)	1,927,608	1,872,846	1,829,418	1,783,898	-
Quantity of water tapped (m <sup>3</sup> )	11,470,069	9,050,038	7,940,434	7,028,594	-
Conventional waste recovery rate	51%	68%	66%	77% in France and 21% worldwide	-
<b>Means indicators</b>					
Internal inspections carried out by the General Inspectorate	59	53	71	62	-
Number of ISO 14001 certified sites	Not obtainable	17	17	17	-

\* Scope 2 GHG emissions have been recalculated from 2019 to 2022 following a change in the benchmark for electricity emissions factors.

\*\* The energy consumption values for 2022 have not been significantly reassessed to take into account minor errors.

## HUMAN RIGHTS AND FUNDAMENTAL FREEDOMS

Indicators	Reference 2019	2021	2022	2023	Comments
<b>Results indicators</b>					
Percentage of employees covered by a collective agreement (France)	100%	100%	100%	100%	-
Rate of access to training (France)	85%	94%	95%	95%	-
Gender equality index (Group estimate *)	84/100	89/100	> 84/100	> 80/100	-
<b>Means indicators</b>					
Number of compensation gaps addressed (France)	177	200	207	207	-
Amount dedicated to compensating unjustified compensation gaps (euros)	260,000	265,000	293,000	297,000	-
Number of proven ethics incidents related to discrimination	6	3	2	8	-
Number of reporting and support systems set up ** (France)	35	35	25	25	-

\* Estimate considering the Group companies as a single entity.

\*\* Cumulative data at the end of each financial year.

## RESPONSIBLE PURCHASING

Indicators	Reference 2019	2021	2022	2023	Comments
<b>Results indicators</b>					
Share of non-Group purchases by French entities from suppliers located in France	90%	90%	88%	89.1%	-
Share of non-Group purchases by foreign entities made in the host country	73%	73%	74%	88.3%	-
<b>Means indicators</b>					
Contracts including sustainable development commitments *	100%	100%	100%	100%	-

\* In reference to Orano's sustainable development commitment policy which suppliers must accept.

In addition, Orano has implemented a robust internal control system under the Group's management. The purpose of this unique tool is to incorporate all risks identified in the mapping, including the risks identified in this duty of vigilance plan. The objectives and the internal control system are detailed in Section 3.1 of this report.

As a recognized operator in the field of uranium exploration and extraction, Orano Canada Inc. delivers solutions to address present and future global energy challenges.

Its expertise and mastery of cutting-edge technologies enable Orano Canada to offer its customers high-value added products within the uranium mining industry.

Every day, Orano Canada's 450 employees draw on their skills, unwavering dedication to safety and constant quest for innovation, to develop know-how in the exploration and extraction of uranium ore. These efforts will aid in the quest for a reduced impact on our climate and to create a healthy, resource efficient-world both now and tomorrow.

[www.orano.group/canada](http://www.orano.group/canada)

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