



Version: November 2024

VIGILANCE PLAN

SUMMARY

1. **The vigilance plan: the reasons for its implementation**
2. **Governance: Edenred inter-managerial committee**
3. **Methodology of the assessment: Edenred risk mapping**
4. **Results: risks identified and definitions**
5. **Alert system: Edenred integrity line "Safe Channel"**
6. **Mitigation Plan: actions completed and ongoing**
7. **Assessment and report**

1. VIGILANCE PLAN: THE REASONS FOR ITS IMPLEMENTATION

Edenred, a global leader with around 12,000 employees worldwide, is subject to the French Duty of Vigilance law. This law mandates large companies to establish and implement a vigilance plan aimed at preventing severe risks associated with human rights violations, breaches of fundamental freedoms, threats to health and safety, and environmental damage.

Edenred's vigilance plan is not merely a legal obligation but also a strategic tool that enhances the Group's corporate governance and strengthens its commitment to social responsibility. This plan forms part of Edenred's broader strategy to mitigate risks and ensure that its operations subsidiaries and supply chain partners uphold the highest standards of ethical conduct.

Edenred has built this plan upon the French law n° 2017-399 of 27 March 2017 relating to the duty of vigilance, which structures the document.

2. GOVERNANCE: VIGILANCE STEERING COMMITTEE

Edenred has established an inter-managerial committee to ensure the deployment of the vigilance plan and to coordinate the various components it encompasses globally. The following teams form this committee: Risk & Compliance, Procurement, HR, and Health and Safety. This committee will be assessing existing policies and defining the Group's vigilance plan and responsible for monitoring the plan and ensuring its effective dissemination, coordinating various measures, raising awareness among entities, and facilitating the flow of information back to the Group.

The committee also monitors and raises alerts about weak signals within the entities. This committee meets regularly, at least twice per year. It follows the implementation, recommends areas for improvement, and shares implemented actions and best practices across entities.

3. METHODOLOGY OF THE ASSESSMENT: EDENRED RISK MAPPING

a) Methodological approach

Edenred's vigilance risk mapping process is designed to align with the French Duty of Vigilance Act's requirements. The primary objective is to identify, evaluate, and prioritize risks related to human rights, health and safety, and environmental impact across the company's operations, including those of suppliers.

The risk assessment methodology used in Edenred's vigilance plan involves validating and consolidating risks through interviews, internal documentation, and benchmarking against the industry. This comprehensive approach ensures a thorough understanding of potential risks. Stakeholder engagement was a critical component, and this assessment was conducted with the support of a third-party expert.

In the first semester of 2024, Edenred conducted 10 interviews covering all critical functions within the organization. Internal stakeholders, including representatives from health and safety, legal, risk & compliance, human resources (HR), corporate social responsibility (CSR), and product departments, were interviewed to gather insights into potential risks.

b) Risk identification and analysis

- **Scope of identification**

The following risks were identified using internal documentation, including company policies, the Group Risk Assessment results from the Universal Registration Document - URD, and the outcomes of the double materiality assessment. International standards such as GRI, SASB, and OIT¹, along with peer benchmarking, were also used to inform the process.

This assessment covered inherent risks within Edenred's operations, as well as those extending to the value chain and supply chain. The analysis was conducted based on a list of 23 risks related to internal stakeholders and the value chain.

VIGILANCE RISK UNIVERSE: 23 RISKS TO BE ASSESSED

NUMBER	TYPE	RISK	PERIMETER
ENV1	Environment	Waste production and mismanagement	Own activities only
ENV2	Environment	Negative impact of activities on climate change	Own activities only
ENV3	Environment	Poor management of resources and damage to biodiversity within the supply chain	Suppliers only
ENV4	Environment	Impact of supply chain activities on climate change	Suppliers only
ENV5	Environment	Unsustainable food practices promotion	Value chain
ENV6	Environment	Unsustainable mobility solutions promotion	Value chain
HR1	Human Rights	Discrimination and unequal opportunity	Own activities only
HR2	Human Rights	Infringement of freedom of association and collective bargaining	Own activities only
HR3	Human Rights	Violation of freedom of expression	Own activities only
HR4	Human Rights	Opaque, unpredictable and indecent working conditions	Own activities only
HR5	Human Rights	Respect of human rights and decent working conditions in the value chain	Value chain
HR6	Human Rights	Corruption	Value chain
HR7	Human Rights	Anti-competitive practices	Value chain
HR8	Human Rights	Inaccessibility of the solutions	Value chain
HR9	Human Rights	Personal data breaches	Value chain

¹ GRI: Global Reporting Initiative
 SASB: Sustainability Accounting Standards Board
 OIT: International Labor Organization

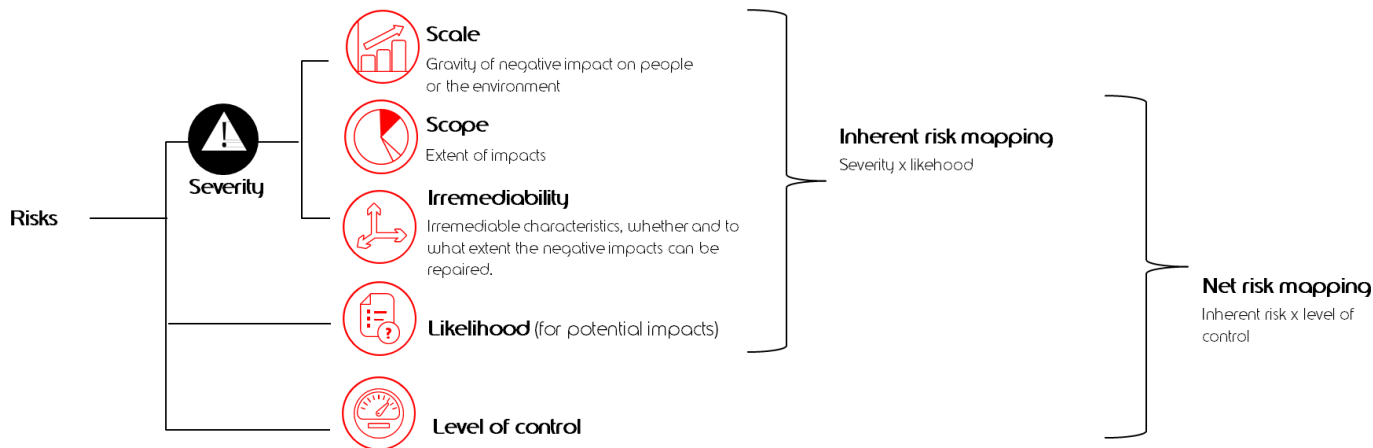
HR10	Human Rights	Social and economic impact on the territories and communities	Value chain
HR11	Human Rights	Ineffective or impossible recourse to the alert system	Value chain
HS1	Health and Safety	Musculoskeletal disorders	Own activities only
HS2	Health and Safety	Work accident	Own activities only
HS3	Health and Safety	Intense workload	Own activities only
HS4	Health and Safety	Physical security breach	Own activities only
HS5	Health and Safety	Damage to the health and safety of employees within the supply chain	Suppliers only
HS6	Health and Safety	Unhealthy lifestyle promotion through unbalanced nutrition	Value chain

- **Vigilance risk assessment methodology**

These 23 risks were evaluated according to the negative impacts identified **in the Double Materiality Assessment** (appendix 1, 2, 3).

Rating and Prioritization: risks were rated based on severity, scope, irremediability, and likelihood. The methodology adhered to recognized international standards, such as those recommended by the OECD² and the UN Guiding Principles³.

Consistency and Arbitration: an arbitration process was implemented to ensure consistency in the risk ratings. Internal experts cross-verified the ratings, and any discrepancies were resolved through a methodological review. This process-maintained alignment with the Double Materiality Assessment, ensuring the assessment's accuracy and reliability.



4. RESULTS: RISK IDENTIFIED AND DEFINITIONS

The results of the 2023 risk assessments conducted on Edenred's activities and its key partners are presented below. This analysis has been done on the negative impacts identified in the double materiality assessment, **which points out 3 priority areas related to the value chain that require further attention.**

1. Impact of supply chain activities on climate change (ENV4)

It refers to the influence that various stages of a company's supply chain, including production, distribution, consumption, and disposal, have on the alteration of the Earth's climate patterns due to the emission of greenhouse gases.

² [OCDE Due Diligence Guidelines for business conduct](#)

³ [UN Guiding Principles](#)

These activities contribute to global warming, extreme weather events, rising sea levels, and other negative consequences associated with climate change. It refers to the activity of Edenred's suppliers and partners. More specifically, for Edenred, it considers the impact of its activity, i.e. the production of payment cards and tickets emits GHG emissions and participates to climate change.

2. Respect for Human rights and working conditions in the value chain (HR5)

It refers to the potential failure to uphold fundamental human rights and provide fair and safe working conditions throughout its value chain (suppliers, partners). More specifically, this risk encompasses various unethical practices, labor violations, and unethical payment practices, that may occur at any stage of the value chain (suppliers, partners).

3. Social and economic impact on stakeholders within the value chain (HR10)

It refers to the potential adverse effects of a company's activities, operations, or decisions on the social and economic well-being of the regions, localities, or communities where it operates. This risk encompasses various social, cultural, and economic dimensions. More specifically, potential negative impact on the business continuity for some stakeholders such as partner merchants and communities as well as local suppliers and organizations (e.g. NGOs), who rely in part on Edenred's solutions and services to maintain their operations, thus impacting their quality of life.

5. ALERT SYSTEM: WHISTLE-BLOWING LINE "SAFE CHANNEL"

Edenred has established a dedicated alert system known as the Integrity Line.

This platform enables employees, partners, suppliers, and external stakeholders to report any conduct or situations that may violate Edenred's anti-corruption policy, Code of Ethics, relevant guidelines and all the laws and regulations applicable in our business. Reports may include concerns related to human rights violations, environmental issues, health & safety, and other serious misconduct. This centralized system is available at <https://edenred.integrityline.org/>. Whistleblowing reports may be made anonymously and can be submitted in 17 different languages and via vocal messages.

Upon receiving a report, the Group's Risk and Compliance Department conducts a preliminary analysis. If further action is required, the information is escalated to the relevant committee, depending on the nature of the alert (such as the Responsible Procurement Committee or HR Committee).

If a confirmed risk is identified within Edenred's value chain, the supplier must present a risk mitigation plan to the Sustainable Procurement Committee and demonstrate its effectiveness. Depending on the severity of the report, or in cases of repeated issues, Edenred reserves the right to conduct or commission an audit of the supplier, including on-site visits if necessary. Based on the audit results and the effectiveness of the mitigation measures, Edenred may reconsider its contractual relationship with the supplier.

6. MITIGATION PLAN: ACTIONS COMPLETED AND ONGOING

Based on the risk mapping, Edenred has defined a series of actions to mitigate the primary risks identified and prevent serious harm to the environment, human rights, fundamental freedoms, and health and safety.

The actions outlined below include:

- 1. Establishing and implementing policies and action plans.**
- 2. Engaging, raising awareness, and training employees on risk prevention.**
- 3. Engaging suppliers through dedicated policies and compliance requirements.**
- 4. Collaborating with value chain partners and other key external stakeholders to address risks.**

5. Conducting audits and investigations when necessary to ensure compliance and risk mitigation.

The prevention of serious harm associated with identified risks is grounded in policies defined by Edenred, along with tailored actions for risk mitigation.

Impact of supply chain activities on climate change

Edenred is actively committed to minimizing the impact of its supply chain activities on climate change by implementing a comprehensive strategy focused on eco-design, sustainable procurement, logistics optimization, and stakeholder awareness. The Group has implemented a series of concrete actions and continues to strengthen its efforts to minimize its environmental footprint.

Actions already implemented by Edenred include:

- Eco-design of physical materials. Edenred has implemented an eco-design approach to minimize the environmental impact of plastic cards and paper vouchers, including the use of recycled or FSC-certified paper, recycled PVC for card production, dematerialization of paper documents accompanying the cards, and Life Cycle Assessments to compare the environmental impact of its products.
- Implementation of the Group Sustainable Procurement Policy. Since 2023, Edenred has worked with suppliers who share its sustainable development values, with initiatives such as a Sustainable Procurement policy, integration of an ethical charter clause in supplier contracts, mapping of CSR risks by purchasing category, and evaluation of strategic suppliers through the EcoVadis platform.
- Increased stakeholder awareness. Edenred is dedicated to raising awareness of climate change issues among its suppliers, clients, and users through awareness campaigns or events, such as the Move for Good program promoting sustainable mobility.

Upcoming actions:

- Further dematerialization of solutions to reduce reliance on physical materials.
- Extension of the supplier charter signature to all critical suppliers at the local level.
- Specific commitments on the carbon reduction plan approved by the Science Based Target Initiative for the next coming years. Edenred commits to reducing Scope 3 greenhouse gas (GHG) emissions by 55% per million Euro value added by 2030 (from a 2019 baseline) and by 97% per million Euro value added by 2050 (from a 2019 baseline). To achieve these targets, Edenred is working on a concrete and ambitious action plan, focusing on Green IT (which accounts for around 40% of Scope 3 emissions) on engaging its suppliers in this journey.

Respect for human rights and working conditions in the Value Chain

Edenred recognizes the importance of ensuring ethical and responsible practices among its suppliers and partners to mitigate potential negative impacts on human rights and employee well-being within the value chain, such as mistreatment of suppliers, payment below the poverty line, and risks of slavery and child labor.

The Group relies on its charter of ethics, sustainable procurement policy, and commitment to social dialogue through its whistleblowing line to address these risks.

- Edenred is committed to upholding human rights as outlined in the Universal Declaration of Human Rights and adheres to the UN Guiding Principles on Business and Human Rights. The Group's actions and performance in these areas are transparently reported in its annual Communication on Progress, available on the United Nations Global Compact website.
-
- Edenred also reaffirms its dedication to respecting the principles and fundamental rights established in the International Labor Organization's (ILO) fundamental conventions.

a) Sustainable procurement policy

In 2023, Edenred has implemented its sustainable procurement Policy which aims to promote purchasing practices that minimize environmental impact, foster diversity and inclusion, and uphold ethical principles and human rights.

This policy includes:

- The Supplier Charter of Ethics, which outlines the expected commitments from suppliers regarding human rights, health and safety, and anti-corruption measures. Edenred includes this charter in all contracts to promote supplier compliance and performance awareness.
- The Sustainable Procurement Committee: a dedicated lead team that aims to oversee the sustainable procurement strategy. This committee is composed of the global Procurement Director, CSR Director, and Compliance Director to enhance these efforts. This team meets regularly and at least 2 times a year.
- In case of alerts, Edenred put in place specific audits for selected partners. Edenred supports suppliers in developing action plans in case of non-compliance.

Upcoming actions

- Edenred will continue to push communications around this integrity line "Safe channel" and engage an increasing number of suppliers in this journey according [to the commitments of its policy](#).

b) SAFE Channel

As stated in the "Alert system" section, Edenred has introduced a specialized channel for reporting potential violations of Edenred's Charter of Ethics.

Upcoming actions

This channel will undergo further reinforcement in the coming years through the following planned actions for 2025:

- Implementation of a new Source to Contract platform, which will oversee all supplier contracts and include a mandatory clause for the alert system in the General Service Agreement.
- Upgrades to the platform and communication initiatives to improve its accessibility and effectiveness.

Social and economic impact on the territories and communities

Edenred implements actions that contribute to minimizing the risk of negative socio-economic impact on territories and communities. These actions aim to create a virtuous ecosystem, support the local economy, combat the informal economy, and promote financial inclusion. More specifically, this impact for Edenred is mostly concentrated on partners' merchants and communities that could suffer from an end of partnerships.

In order to prevent that, Edenred has put into practice partnership management mechanisms to ensure sustainable and balanced collaboration:

- The Supplier Charter of Ethics allows to ensure sustainable and balanced collaboration.
- Promotion of sustainable practices to customers and users to promote more sustainable food. The FOOD program was developed by Edenred and public-sector partners in six countries (Belgium, Czech Republic, France, Italy, Spain, and Sweden) to support a balanced diet during the working day. Launched in 2009 in response to alarming data on the rise in obesity in Europe, the campaign began as a test project co-financed by the European Commission, enabling partners to develop innovative recommendations and communication tools for employees and partner restaurants. Between 2009 and 2023, more than 500 communication tools have been developed, helping to raise awareness around the issue among more than 7.4 million employees, 251,000 companies and 500,000 restaurants in the program's 11 member countries. A network of restaurants pledging to meet FOOD recommendations was also created to offer balanced lunchtime meals. In 2023, it has more than 4,350 members. More broadly, Edenred promotes sustainable food in all territories through its solutions. In 2023, 72% of Edenred Merchants and users were made aware of balanced nutrition and food waste.
- The program "Move for Good", accompanies clients along their transition to sustainable mobility. It measures and contributes to reducing emissions by encouraging lower carbon mobility options, such as electric vehicles or bioethanol. It raises awareness among the community, clients, and users by giving them access to the best resources and knowledge bases.
- The promotion of financial inclusion. Edenred uses the digital technology applied to its solutions to promote financial, technological, and social inclusion for its stakeholders taking into account the specific needs of each territory and community. The Group has developed Edenred salary card solutions, which contribute to the financial inclusion of the most vulnerable employees. In the United Arab Emirates, for instance, 1.8 million unbanked or underbanked workers now have access to financial services, allowing them to receive their wages regularly and securely (they were previously paid in cash), withdraw cash, make in-store, online and mobile payments, and transfer money abroad. Users can even take advantage of a salary advance insurance service in case of loss of employment. The Brazilian subsidiary Repom develops prepaid cards for independent truck drivers who deliver goods as an outsourced service for major manufacturers and trucking companies. They can be used to receive wages and carry out secure transactions.

Upcoming actions:

- Edenred will continue to promote products and solutions that support better integration of the communities, adapted to each territory.

7. FOLLOW UP AND ASSESSMENT

The assessment scope of this vigilance plan will be reviewed regularly to reflect Edenred's and its partners' recent evolutions, monitor the effectiveness of mitigation actions implemented, and focus on areas of higher concern.

Each year, Edenred discloses key figures about the Safe channel in its Universal Registration Document to highlight management and progress.

APPENDIX 1: RISK ASSESSMENT SCALE

HUMAN RIGHTS

SCALE - Level	Score	Description
5 - Absolute	5	Severe or imminent threat to human rights.
4 - High	4	Substantial adverse effects on human rights.
3 - Medium	3	Moderate but noticeable adverse effects on human rights.
2 - Low	2	Some minor adverse effects on human rights.
1 - Minimal	1	Minor impact on human rights.
0 - None	0	No identified human rights risks associated with the activity or situation, human rights are fully respected and protected.

SCOPE - Level	Score	Description
5 - Global / total	5	An entire organization or community affected, impacting all individuals without exception, with no geographical or sectoral limitations.
4 - Widespread	4	A large proportion of the organization or community affected, impacting numerous departments, sections or a significant number of individuals across different areas.
3 - Medium	3	Extension beyond a specific group, affecting multiple departments or sections of an organization, or a moderate number of individuals across different areas.
2 - Concentrated	2	A specific group or department within an organization affected, with significant consequences for this concentrated group but limited effects on others.
1 - Limited	1	A small number of individuals affected, with minimal impact beyond this limited group.
0 - None	0	No individual affected.

REMIEDIABILITY - Level	Score	Description
5 - Non-remediable	5	Consequences that can not be remediated or reversed resulting in profound and enduring harm to individuals and communities.
4 - Very difficult to remedy or long-term	4	Consequences that challenging to remediate in the long-term, requiring extensive effort, time and cost, and may be irreversible if unaddressed.
3 - Difficult to remedy or mid-term	3	Consequences that are challenging to remediate in the mid-term, requiring significant effort, time and cost, and may have lasting effects if not addressed promptly.
2 - Remediable with effort (time and cost)	2	Consequences that can be mitigated with moderate effort, time or cost, but may require ongoing efforts to achieve full resolution.
1 - Relatively easy to remedy short-term	1	Consequences that can be remedied in the short-term with some effort, time or cost, but without significant long-term implications.
0 - Very easy to remedy	0	Consequences that are quickly and easily mitigated with minimal effort, time and cost, without any long-term impact on individuals or communities.

HEALTH & SAFETY

SCALE - Level	Score	Description
5 - Absolute	5	Fatal accident, incurable disease or irreversible injury.
4 - High	4	Injury requiring the medical intervention and a long-time off work.
3 - Medium	3	Injury that may require medical attention and short time off work.
2 - Low	2	Superficial injury, requiring medical attention but no time off work.

1 - Minimal	1	Very superficial injury occurring in the workspace, not requiring medical attention.
0 - None	0	No harm to employees' health and safety resulting from an accident or incident.

SCOPE - Level	Score	Description
5 - Global / total	5	An entire organization or community affected, impacting all individuals without exception, with no geographical or sectoral limitations.
4 - Widespread	4	A large proportion of the organization or community affected, impacting numerous departments, sections or a significant number of individuals across different areas.
3 - Medium	3	Extension beyond a specific group, affecting multiple departments or sections of an organization, or a moderate number of individuals across different areas.
2 - Concentrated	2	A specific group or department within an organization affected, with significant consequences for this concentrated group but limited effects on others.
1 - Limited	1	A small number of individuals affected, with minimal impact beyond this limited group.
0 - None	0	No individual affected.

REMEDIABILITY - Level	Score	Description
5 - Non-remediable	5	Injuries causing death, lifelong disability requiring reinforced medical care and inducing significant physical, emotional and vocational challenges in the long term for the worker.
4 - Very difficult to remedy or long-term	4	Injuries requiring reinforced medical care and inducing significant physical, emotional and vocational challenges in the long term for the worker.
3 - Difficult to remedy or mid-term	3	Injuries requiring several months to several years and requiring surgeries, prolonged rehabilitation and adjustment in work activities and personal life.
2 - Remediable with effort (time and cost)	2	Injuries requiring time and medical care (including immobilization and rehabilitation) to fully recover.
1 - Relatively easy to remedy short-term	1	Injuries from which the worker can recovered with an appropriate treatment (e.g., rest, ice, bandaging) within a few days to weeks and resume to normal activities.
0 - Very easy to remedy	0	Injuries from which the worker can easily recovered, with no significant impact on their work activities and personal life (e.g. minor scratch).

ENVIRONMENT

SCALE - Level	Score	Description
5 - Absolute	5	Severe or catastrophic damage to the environment.
4 - High	4	Substantial adverse effects on the environment.
3 - Medium	3	Moderate but noticeable adverse effects on the environment.
2 - Low	2	Some minor adverse effects on the environment.
1 - Minimal	1	Minor or trivial impact on the environment.
0 - None	0	No harm or impact to the environment.

SCOPE - Level	Score	Description
5 - Global / total	5	Global scale, impacting all or nearly all areas and aspects of the environment, with no geographical or sectoral limitations.
4 - Widespread	4	Extensive spread, affecting numerous areas or aspects of the environment across a wide geographic area.
3 - Medium	3	Extension above a specific area or aspect, affecting multiple locations or elements of the environment within a moderate range.
2 - Concentrated	2	One particular area or aspect of the environment affected, with significant impact within this concentrated scope but limited effects elsewhere.
1 - Limited	1	Small and specific area or aspect of the environment affected, with minimal impact beyond this limited scope.

0 - None	0	No identifiable scope and no area of the environment affected.
-----------------	----------	--

REMEDIABILITY - Level	Score	Description
5 - Non-remediable	5	Consequences that can not be remediated or reversed, resulting in permanent damage or loss to the environment.
4 - Very difficult to remedy or long-term	4	Consequences that are challenging to remediate in the long-term, requiring extensive effort, time and cost, and may be irreversible if unaddressed.
3 - Difficult to remedy or mid-term	3	Consequences that are challenging to remediate in the mid-term, requiring significant effort, time and cost, and may have lasting effects if not addressed promptly.
2 - Remediable with effort (time and cost)	2	Consequences that can be mitigated with moderate effort, time or cost, but may require ongoing management or maintenance.
1 - Relatively easy to remedy short-term	1	Consequences that can be remedied in the short-term with some effort, time or cost, but without significant long-term implications.
0 - Very easy to remedy	0	Consequences that are quickly and easily mitigated with minimal effort, time and cost, without any long-term impact on the environment.

OTHER CRITERIA

FREQUENCY - Level	Score	Description
5 - Highly likely	5	Almost certain to occur more than once within the next 12 months.
4 - Likely	4	This risk is almost certain to occur within the next 12 months.
3 - Moderate	3	This risk could occur at least once in the next 3 years.
2 - Rare	2	The risk could occur at least once in the next 3 to 5 years.
1 - Unlikely	1	The risk is unlikely to occur in the next 5 to 10 years.

CONTROL - Level	Score	Description
4 - Total control	4	Procedures are formalized, responsibilities defined, and comprehensive actions implemented (mitigation or remedial action, training, monitoring, internal control, evaluation, etc.) and the results obtained demonstrate that the risk is under control. No additional measures could improve risk management.
3 - High control	3	Procedures are formalized, responsibilities defined, and comprehensive actions implemented (mitigation or remedial action, training, monitoring, internal control, evaluation, etc.) but the results obtained demonstrate that the risk is not completely under control.
2 - Moderate control	2	An organization has been established (responsibilities, procedures, action plans, etc.), but more could be done.
1 - Partial control	1	Some actions or procedures exist, but they are insufficient, there is no overall action plan, and responsibilities are diffuse or not formalized.
0 - Risk discovery	0	No measures have been implemented.

APPENDIX 2: RISK DEFINITION

ID	RISK	DEFINITION	PERIMETER
ENV1	Waste production and mismanagement	<p>It refers to the generation of excessive waste materials and the improper handling, disposal, or treatment of those wastes. Waste production and mismanagement can encompass various aspects: excessive waste generation, improper disposal, lack of recycling and reuse, hazardous waste mismanagement, or waste-to-energy challenges.</p> <p>More specifically, at Edenred, it involves the production and mismanagement of waste within the infrastructures owned by the Group (e.g. offices) such as household waste, electrical and electronic waste, food waste.</p>	Own activities only
ENV2	Negative impact of activities on climate change	<p>It refers to the phenomenon of long-term shifts in global climate patterns due to the accumulation of greenhouse gases (GHGs) in the Earth's atmosphere. GHGs, such as carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O), trap heat from the sun and contribute to the warming of the planet.</p> <p>More specifically, Edenred's direct activities emit GHG emissions mostly through direct or indirect emissions from stationary sources, direct emissions from mobile sources, business travel and commuting.</p>	Own activities only
ENV3	Poor management of resources and damage to biodiversity within the supply chain	<p>It refers to the negative impact that various stages of a company's supply chain, including suppliers and manufacturers, can have on natural resources (extraction and waste) and the diversity of living organisms in ecosystems. These impacts can stem from unsustainable practices, overexploitation of resources, habitat destruction, pollutions, and other activities that harm ecosystems and their inhabitants.</p> <p>More specifically, during the process of producing the payment cards and tickets, suppliers use a huge amount of resources (electronic components, paper, inks, chemicals...) that can damage the biodiversity and participate to resources scarcity. It takes also into account the potential ecological consequences related to the disposal of materials (vouchers, cards) and its poor eco-design.</p>	Suppliers
ENV4	Impact of supply chain activities on climate change	<p>It refers to the influence that various stages of a company's supply chain, including production, distribution, consumption, and disposal, have on the alteration of the Earth's climate patterns due to the emission of greenhouse gases and other pollutants. These activities contribute to global warming, extreme weather events, rising sea levels, and other negative consequences associated with climate change. It refers to the activity of Edenred's suppliers and also partners.</p> <p>More specifically, for example concerning Edenred, the production of payment cards and tickets emits GHG emissions and participates to climate change.</p>	Suppliers
ENV5	Unsustainable food practices promotion	<p>It refers to the promotion of partners' actions or behaviors related to the production, distribution, preparation, consumption, or disposal of food that are characterized by a lack of consideration for environmental consequences. These practices may include overconsumption, food waste or unsustainable agricultural methods, that contribute to environmental issues such as greenhouse gas emissions, resource depletion, and landfill pollution.</p> <p>More specifically, the broad availability of catering offers does not alert consumers to the scarcity of food as a resource. In contrast, unsustainable food production has major environmental impacts (mostly on biodiversity and climate). As Edenred works with a large number of food partners, food waste can be present among them and later with end consumers. The impact of industrial food is also highly detrimental to the environment (soil degradation, etc.) and to CO₂ emissions (e.g. meat in meals, long supply chains).</p>	Value chain

ENV6	Unsustainable mobility solutions promotion	<p>It refers to the promotion of unsustainable mobility practices or solutions, having a negative effect on the environment. These practices include activities such as excessive reliance on fossil fuels, high emissions of greenhouse gases, air and noise pollution, habitat destruction due to infrastructure expansion, and disruption of ecosystems. Unsustainable mobility practices contribute to climate change, degrade air and water quality, and harm biodiversity, posing significant environmental challenges.</p> <p>More specifically, the use of petrol cards leads to various forms of pollution, including air and soil pollution. If Edenred does not promote sustainable mobility, it may perpetuate dependence on fossil fuels such as oil and gas.</p>	Value chain
HR1	Discrimination and unequal opportunity	<p>Unjust or prejudicial treatment of individuals or groups based on factors such as their race, gender, age, religion, ethnicity, or other characteristics. It involves unfairly denying rights, opportunities, or benefits to certain individuals or treating them differently than others in similar situations. Also, it includes bullying, sexual harassment, intimidating behavior or violence in the workplace, creating a toxic working environment and generating stress and mental health problems for the workers concerned.</p> <p>More specifically, this risk may refer to a discriminatory hiring process (cognitive bias, refusal of candidates from certain social backgrounds or educational courses), lack of accessibility (buildings, facilities), absence of reasonable adaptations (specific accommodations, assistive technologies), unfair treatment (promotion, remuneration, training, benefits), stigmatization and inappropriate behavior, offensive comments, sexist behavior or even harassment.</p>	Own activities only
HR2	Infringement of freedom of association and collective bargaining	<p>Freedom of association entails the right of workers to join or form trade unions and other organizations to protect their interests. Collective bargaining refers to the process where these organized groups negotiate with employers to establish fair wages, safe and appropriate working conditions, and other employment-related matters.</p> <p>More specifically, this risk can refer to anti-union discrimination, hampered collective bargaining, withdrawal of benefits or even refusal to recognize established unions.</p>	Own activities only
HR3	Violation of freedom of expression	<p>It refers to situations where the company's actions, policies, or practices impede or infringe upon the rights of individuals within or outside the organization to express their opinions, beliefs, or viewpoints freely and without fear of retaliation or censorship. This can include censorship, intimidation, manipulation of information or excessive surveillance.</p> <p>More specifically, this risk can take the form of measures that restrict the free expression of employees, excessive monitoring or the implementation of internal policies restricting discussion of sensitive topics. It may also involve repercussions on career progression for employees who express divergent points of view, particularly in the public sphere on their own time (NGOs, think tank, political involvement, etc.) or even unfair dismissal in violation of their right to freedom of expression.</p>	Own activities only
HR4	Opaque, unpredictable and indecent working conditions	<p>It refers to situations in which employees face uncertainty, lack of transparency, and insecurity regarding their employment status, job responsibilities, working conditions, or future prospects within the organization.</p> <p>More specifically, this risk can manifest in various ways, including but not limited to:</p> <ul style="list-style-type: none"> - Opaque and unpredictable working conditions: unclear job expectations, lack of transparency, job insecurity due to layoffs, restructuring, outsourcing or precarious work arrangement - Indecent working conditions: e.g. unreasonable working hours, little paid leave, lack of social protection, indecent salary. 	Own activities only
HR5	Respect of human rights and decent working conditions in the value chain	<p>It refers to the potential failure to uphold fundamental human rights and provide fair and safe working conditions throughout its value chain (suppliers, partners).</p> <p>More specifically, this risk encompasses various unethical practices and labor violations, including but not limited to child labor, undeclared labor, forced labor, unsafe working conditions and unethical payment practices, that may occur at any stage of the value chain (suppliers, partners).</p>	Value chain

HR6	Corruption	<p>It refers to the abuse of entrusted power for private gain, which can manifest through bribery, extortion, fraud, embezzlement, or other illicit practices. This unethical behavior undermines the integrity of institutions, distorts markets, and erodes public trust.</p> <p>In certain cases, it can have potential consequences on human rights such as:</p> <ul style="list-style-type: none"> - Exacerbate inequality by diverting resources away from essential services and public goods, in the worst case scenario depriving individuals of their rights to healthcare, education and basic services - Exacerbate violence, discrimination and exploitation, thereby undermining efforts to uphold human rights standards and protect vulnerable populations <p>This risk may be induced by Edenred's activities or those of its suppliers, or even partners.</p>	Value chain
HR7	Anti-competitive practices	<p>Anti-competitive practices involve actions taken by companies to restrict competition in a market, such as price-fixing, collusion, market allocation, or abuse of dominant market position. These practices undermine fair competition, limit consumer choice, and harm market efficiency. In certain cases, it can have potential consequences on human rights such as:</p> <ul style="list-style-type: none"> - Lead to economic inequality by stifling innovation, driving up prices, and reducing the quality of goods and services, thereby impeding individuals' ability to access essential goods and services necessary for realizing their economic and social rights. - Exacerbate labor rights violations by creating monopolistic conditions that allow companies to exploit workers through low wages, poor working conditions, and limited job opportunities. - Undermine the right to development by hindering economic growth, stifling entrepreneurship, and perpetuating unequal distribution of wealth and resources, thereby impeding efforts to achieve sustainable development and poverty reduction goals. <p>This risk may be induced by Edenred's activities or those of its suppliers, or even partners.</p>	Value chain
HR8	Inaccessibility of the solutions	<p>It refers to the extent to which a solution or product is readily available and usable by its intended users, as well as its effectiveness in addressing their needs or solving a particular problem. This concept encompasses factors such as ease of access, user-friendliness, relevance, and effectiveness in achieving desired outcomes.</p> <p>More specifically, as Edenred's solution is digital, the company needs to think about digital accessibility for people with disabilities or elders or illiterate people who might have difficulties to use Edenred' solution. It can refer to infringement of the human rights of individuals if the Group's practices discriminate in the choice of customers, or significantly impede access to so-called "essential" goods for users of services.</p>	Value chain
HR9	Personal data breaches	<p>This risk relates to the possibility that information collected from workers, customers and partners may be mismanaged, used inappropriately or disclosed without authorization. It also encompasses potential threats to the confidentiality, integrity and availability of the organization's data and IT systems, whether due to malicious activity, human error, technical failures or digital vulnerabilities.</p> <p>In addition to possible data leaks, this risk also concerns the inappropriate/inappropriate processing of certain data (particularly sensitive data), which may have consequences for human rights (e.g. discrimination, freedom of expression).</p> <p>More specifically, a lot of data is processed through Edenred's value chain. Cybersecurity is a critical topic for the company as trust is key and malware attacks are frequent. It can also refer to the exploitation of user data without consent or ethical considerations.</p>	Value chain
HR10	Social and economic impact on the territories and communities	<p>It refers to the potential adverse effects that a company's activities, operations, or decisions may have on the social and economic well-being of the regions, localities, or communities where it operates. This risk encompasses various social, cultural, and economic dimensions.</p> <p>More specifically, potential negative impact on the business continuity for some stakeholders such as partner merchants and communities as well as local suppliers and organizations (e.g. NGOs), who rely in part on Edenred's solutions and services to maintain their operations, thus impacting their quality of life.</p>	Value chain

HR11	Ineffective or impossible recourse to the alert system	It refers to the situation where employees or individuals face difficulties in using an internal system or process intended to report concerns, issues, or violations within a company. This could be due to inaccessibility for vulnerable populations (barrier of access, language, illiteracy, people with disabilities...), fear of retaliation, lack of confidentiality, mistrust in the effectiveness of the mechanism, or organizational barriers that hinder access to this alert mechanism / whistleblowing system.	Value chain
HS1	Musculoskeletal disorders	It refers to conditions affecting the muscles, bones, tendons, and related structures due to work-related activities. These disorders can arise from factors like repetitive tasks, awkward postures, and inadequate ergonomics, leading to discomfort, pain, and reduced physical function for employees. More specifically, at Edenred, employees mainly work in offices in front of computers, and posture can have a huge impact. Teleworking can accentuate this risk.	Own activities only
HS2	Work accident	It is an unforeseen event that occurs during work activities and results in physical injury, illness, or fatality to an employee or other individuals within the workplace or on the way. These accidents can happen due to various factors such as unsafe working conditions/facilities, equipment malfunction, human error, lack of proper training, or failure to follow safety protocols. Work accidents can range from minor incidents to more severe injuries or fatalities, and they are typically subject to investigation to determine their causes and prevent similar occurrences in the future.	Own activities only
HS3	Intense workload	It refers to a situation in which an individual or a group of individuals is required to complete a significant amount of tasks or assignments within a relatively short period of time. This often results in high levels of pressure, stress, and time constraints, potentially leading to exhaustion, burnout, and decreased productivity. It can also be due to an increase in staff turnover inducing increased workloads or economic growth.	Own activities only
HS4	Physical security breach	It refers to the potential occurrence of unauthorized access, disclosure, alteration, or destruction of facilities/buildings, assets, or systems within an organization, resulting in direct harm to individuals, communities, or populations. This risk encompasses security breaches that not only compromise the confidentiality, integrity, or availability of critical resources but also pose immediate threats to human safety, well-being, and rights, particularly in contexts such as armed conflicts, terrorist attacks, or civil unrest. More specifically, it can involve for example seismic risks, terrorist attacks, armed conflicts or even violent extremism and crimes in some area where the Group is located. It can also concern employees travelling to high-risk areas.	Own activities only
HS5	Damage to the health and safety of employees within the supply chain	It refers to the potential occurrence of harm, injury, illness, or fatalities to workers involved in the production and delivery of goods and services within the company's supply chain. This risk encompasses various hazards and unsafe conditions that may arise at different stages of the supply chain, including manufacturing facilities, warehouses, transportation networks, and can result in adverse health outcomes, physical injuries, or loss of life among employees. More specifically, it involves workplace accidents, occupational illnesses or any type of harm, injury, illness or fatalities to workers involved in the goods and services purchased by Edenred.	Suppliers
HS6	Unhealthy lifestyle promotion through unbalanced nutrition	It refers to the potential adverse effects of a company's marketing, advertising, or promotion of products or services that contribute to poor dietary habits, unhealthy eating patterns, and negative impacts on public health and well-being. This risk encompasses various factors related to nutrition, dietary choices, and lifestyle behaviors that may be influenced or exacerbated by the company's marketing practices. More specifically, it can include promotion of unhealthy food and beverages, misleading or deceptive marketing claims, targeting vulnerable populations, influence on dietary preferences and behaviors.	Value chain

APPENDIX 3: DOUBLE MATERIALITY ASSESSMENT

