

## **HUMAN RIGHTS UNDERTAKINGS**

### **COMBAT AGAINST SLAVERY AND HUMAN TRAFFICKING**

#### **2019**

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (Act of the Parliament of the United Kingdom, designed to combat modern slavery in the UK and consolidates previous offences relating to trafficking and slavery. Under this Act, any commercial organization (i) which supplies goods or services, and (ii) has a total turnover of not less than 36 millions of Pounds, shall publish each year a statement of the steps the organization has taken during the financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains, and in any part of its own business.

#### **STRUCTURE**

Subsidiary of the Bolloré Group, IER develops, since 1962, solutions, using emerging technologies to meet the specific needs of its clients. Its command of these new technologies and its expertise have allowed it to become a vital key player in the following markets:

- (i) The design, production and marketing of solutions for major passenger transport networks (air and rail), with a full range of self-service solutions, from check-in to boarding for air travel and ticket vending machines and information terminals for travel on land.
- (ii) The integration of identification, tracking and mobility solutions for logistics contractors, industry and transport. Its mastery of barcode, RFID, voice activation, WiFi and GPRS systems has made IER a benchmark in integration and service throughout the supply chain.
- (iii) The development of terminals, electric charging points and identification and geolocation systems which have made IER a key player on the car sharing market, both in France and internationally.
- (iv) The supports of both central and local government in implementing legislation on the decentralization of parking restrictions and in issuing electronic penalty notices.

#### **HUMAN RIGHTS POLICY**

This statement is part of the comprehensive approach of the Bolloré Group, to which IER belongs, to place respect for and promotion of Human Rights as an essential component of its activities.

This declaration is part of the global approach of the Bolloré Group, to which IER belongs, to place respect for and promotion of Human Rights as an essential component of its activities. The Bolloré Group integrates Human Rights as a fundamental pillar of its CSR strategy since 2017 and has reinforced its commitment in 2019 through the signature of a Human Rights Charter. Deployed across all its divisions and subsidiaries, the Human Rights Charter enshrines respect for workers' rights throughout the value chain, respect for the fundamental rights of neighboring communities and populations, and an ongoing attempt to make a positive social contribution, as priority issues.

In addition, as a signatory of the United Nations Global Compact since 2003, the Bolloré Group is committed to respect its principles, which form the ethical foundation of its Code of Conduct.

In terms of the protection of Human Rights, the Group Bolloré and its subsidiaries are constantly improving their reasonable due diligence through the implementation of a Human Rights action plan, as well as an approach based on the implementation of cycles of vigilance, integrating the specificities of the territories in which they operate as well as those of their businesses, making it possible to identify, prevent and mitigate the risks of serious harm, and to report on the results.

As a subsidiary of the Bolloré Group, IER respects the principles and commitments of the Bolloré Group to which it belongs and in particular:

- (i) The Bolloré Group Code of Conduct compliance guide;
- (ii) The Bolloré Group Ethics and Values Charter;
- (iii) Human Rights and Diversity and Inclusion Charters of the Bolloré Group, based on the International Charter of Human Rights, the Guiding Principles of the United Nations, the OECD and the fundamental conventions of the I.L.O. (International Labour Organization);
- (iv) The CSR IER Charter.

These documents contain commitments in terms of respect for workers' rights, Human Rights and the combat against slavery and human trafficking.

## **DUE DILIGENCE PROCESSES AND RISK ASSESSMENT**

Within the frame of its activities, IER is aware that the highest risks concerning the respect of Human Rights are to be found in its supply chain, and more particularly with its partners located in so-called "developing" countries.

In order to limit such risks, IER has put in place various measures, such as:

- A due diligence procedure to evaluate a partner on the respect of the ethical commitments of the Bolloré Group and of IER which includes in its questionnaire a section on the respect of Human Rights in risk areas. This procedure is intended to be deployed more widely.
- The introduction of contractual clauses, in particular in its General Purchasing Conditions, requiring suppliers and service providers to comply with applicable ethical regulations, including regulations relating to respect for Human Rights, in particular the principles of the I.L.O. (prohibition of forced labour and child labour).

## **GOVERNANCE**

The integration of the CSR into the Bolloré Group's governance system is reflected in the establishment and annual meeting of the Group's CSR Ethics and Anti-Corruption Committee. Comprising a Chairman, the Group's General Management, the Business Unit General Managers, and the Group Directors of Human Resources, Legal, Compliance, Management Control, Finance, Investor Relations, Communications and CSR, the CSR Ethics and Anti-Corruption Committee meets to set the main work domains that the divisions are responsible for deploying within their perimeter, in order to ensure compliance with the Bolloré Group's commitments and develop action plans specific to their activities.



In 2018 and 2019 IER has been assessed by ECOVADIS, an organization responsible for evaluating corporate CSR commitments, which includes an assessment of the "social and Human Rights" criterion. In 2018 and 2019 IER was ranked "Gold" by the organization

## **TRAINING**

The Bolloré Group integrates subjects relating to good business conduct, ethics, anti-corruption and respect for Human Rights into its training strategy and, in particular, provides online training modules accessible to all employees worldwide

Each IER's employee receives various documents at the time of hiring, including the policies implemented by the Bolloré Group and by IER on their CSR commitments. Each employee shall comply with them. Failure to comply with these documents is considered as a misconduct that may give rise to the application of a disciplinary sanction.

**On January 8<sup>th</sup>, 2020**

**Massimo Boulvain**  
**As representative of the CEO of IER SA.**