



**VIGILANCE PLAN**  
2019

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# Introduction

**T**his document presents Veolia's vigilance plan (the Plan) in application of French law no. 2017-399 relating to the duty of care of parent companies and subcontracting companies. This plan is based on "reasonable due diligence to identify risks and prevent severe impacts on human rights and fundamental freedoms, on people's health and safety, and on the environment".

Under this law, the Plan must include the following items:

- a risk map;
- an assessment of subsidiaries, suppliers, and subcontractors;
- a whistleblowing system;
- action plans;
- a monitoring and assessment system.

Note that the structure of this plan does not necessarily follow the same order as the list of items above. This is a deliberate choice which reflects Veolia's appropriation of the duty of care law requirements.

In addition, the Plan applies to the entire Group.



# 1 Governance

This section details the governance architecture implemented by Veolia to meet the law's requirements: resources allocated to develop the Plan, methods to monitor it, and, finally, essential characteristics of the whistleblowing system.

## 1.1 RESOURCES ALLOCATED TO THE VIGILANCE PLAN

The following individuals and functions help manage and implement the Plan:

- Group's General Counsel
- Functional departments:
  - purchasing
  - public affairs
  - compliance
  - sustainable development
  - legal
  - human resources
  - risks
  - business and performance support
- Human Rights Manager reporting to the Compliance Department
- Network of compliance directors and officers
- Network of sustainable development directors and officers
- Representatives of operational areas

The Human Rights Manager is in charge of managing and coordinating the duty of care process for the entire Veolia Group.

## 1.2 PLAN MANAGEMENT

The Human Rights and Vigilance Committee (the Committee) is the essential steering body for the Plan. In particular, made up of the individuals and functions listed above, it forms the cornerstone of the monitoring and assessment system as required by the duty of care law. The Committee notably rules on:

- the selection of monitoring indicators, their performance, and their relevance;
- the nature and completeness of the publications relating to the duty of care;
- the validity of the conclusions of the dedicated risk mapping implemented;
- the results of the action plans: progress, relevance, effectiveness, etc.;
- the follow-up given to alerts falling within the scope of the duty of care law reported via the whistleblowing system;
- any ad hoc measure/question relating to the duty of care.

## 1.3 WHISTLEBLOWING LINE

In accordance with the law's requirements Veolia Environnement has implemented a whistleblowing line to ensure that situations relating to the duty of care are reported. This digital platform offers authors of reports the possibility of remaining anonymous if they wish, even if this method is not recommended as it does not guarantee optimum processing of the alerts received.

The Group Ethics Committee is in charge of this procedure. On receipt of a report falling within the scope of the duty of care law, the Ethics Committee transfers it to the Compliance Department for processing. Further to its investigations carried out within the framework of the Whispli platform, the Compliance Department submits its conclusions to the Ethics Committee, which then closes the alert and archives it after having informed its author.

In application of the duty of care law, any third party may go to the Ethics Committee using the procedure described above. The link to use is:

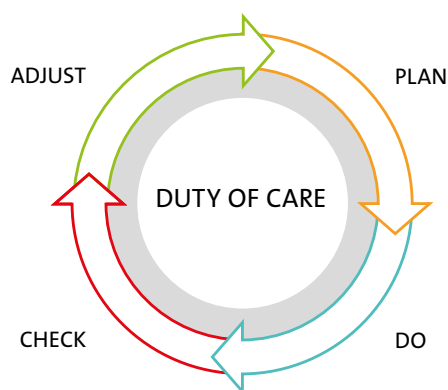
<https://veolia.whispli.com/fr/tiers-ethique>

## 2 Methodology

In order to develop the Plan, the methodological approach applied needed to be specified as it determines the content of Veolia's response to the law's requirements.

### 2.1 APPROACH

The concern for monitoring and assessment promoted by the duty of vigilance law is part of a continuous improvement process. The latter is based on the Plan-Do-Check-Adjust (PDCA) approach, which can be mapped out as follows:



### 2.2 RISK MAPPING

Risk assessment is an essential step in developing the Plan. Its results have a decisive influence on the policy and actions taken to meet the duty of care law's requirements.

It should be emphasised that, unlike standard mapping, which is generally focused on the organisations sponsoring them, the duty of care risk assessment is focused outwards on the direct impacts that the business activities may have on third parties<sup>(1)</sup>.

Veolia's risk mapping is based on its own methodology developed by the Group's Risk Management Department. This approach is adapted, if necessary, to take into account the specificities of each of the themes falling within the scope of the law: human rights and fundamental freedoms, health and safety, environment, and supply chain.

The main risk mapping methods used are:

- working groups participated in by functional departments;
- questionnaires to encourage feedback to nurture analysis and reflections during the risk assessment stage;
- discussions between the head office and operations to ensure consistency and feed the results of the mapping process.

For the sake of clarity, a separate presentation of the conclusions of the mapping for each of the duty of care law's themes seemed the most relevant (see part 3 – Risk mapping results).

### 2.3 INDICATORS

Monitoring indicators contribute to the duty of care law's effectiveness because they help guide:

- deployment of the actions taken and assessment of their effectiveness;
- reflection on the application of the law by Veolia.

Their performance is presented in part 6 – Key performance indicators.

(1) Including employees of companies concerned by the application of the duty of care.

## 3 Risk mapping results

In line with the methodology developed in section 2.2, mapping conclusions are grouped into four separate sections corresponding to the duty of care law's themes.

A presentation in the form of tables was favoured, the use of a materiality matrix not necessarily seeming the most relevant approach to best understand the issues related to the risks identified during the mapping stage. Similarly, a breakdown by theme seemed more judicious for a clear understanding by the Group's stakeholders of the duty of care risks induced by Veolia's activities.

The summary tables are structured as follows:

- Risk category: generic title of the identified risk;
- Example(s): illustration of the materialisation of the risk;
- Possible cause(s): factors that may be causing the risk;
- Possible consequence(s): potential impacts in the event of an incident.

It should be noted that the tables below present the main risks related to duty of care themes; however, they are not exhaustive. The risk mapping will be regularly updated to ensure continuity of their relevance over time.

### 3.1 HUMAN RIGHTS

Risk category	EXAMPLE(S)	POSSIBLE CAUSE(S)	POSSIBLE CONSEQUENCE(S)
Forced labour	Immigrant workers who may be taken advantage of due to their migrant status	Unfavourable cultural and legislative environment	Rights of vulnerable workers regarding issues such as pay, paid leave, freedom to terminate employment contracts
Child labour	Children illegally sorting waste in landfills managed by Veolia	<ul style="list-style-type: none"> <li>• Unsecured site</li> <li>• Existence of a sizeable informal sector</li> <li>• Poverty of local populations</li> </ul>	<ul style="list-style-type: none"> <li>• Negative impact on the level of education</li> <li>• Injury</li> <li>• Death</li> </ul>
Discrimination	<ul style="list-style-type: none"> <li>• Discrimination against lesbian, gay, bisexual, transgender, and intersex people</li> <li>• Disability</li> <li>• Origins, religion, nationalities</li> <li>• Workplace gender equality: percentage of women employment, percentage of women in management, percentage of female executives, percentage of women sitting on the boards of directors of Group companies, including Veolia</li> </ul>	<ul style="list-style-type: none"> <li>• Lack of management involvement</li> <li>• Lack of an HR framework and procedures to deal with these subjects</li> </ul>	<ul style="list-style-type: none"> <li>• Career hindered or blocked</li> <li>• Ostracism</li> </ul>
Lifestyles of local communities	Native community affected by the presence of Veolia's activities	Lack of inclusion of local communities in projects	<ul style="list-style-type: none"> <li>• Relocation of communities</li> <li>• Impact on communities' productive activities</li> </ul>
Freedom of association and right to collective bargaining	Inability of workers to organise their representation	<ul style="list-style-type: none"> <li>• Local legislation prohibiting unions</li> <li>• Management's refusal to dialogue with workers</li> </ul>	Deterioration of the company's social climate

*N.B.: Risks relating to suppliers and subcontractors are covered in section 3.4.*

The risk of a cultural gap must be kept in mind to ensure the effectiveness of Veolia's human rights policy. The Group's initiatives to promote these issues internally could effectively be frowned upon and even backfired in certain countries in which Veolia operates.

## 3.2 HEALTH AND SAFETY

Risk category	EXAMPLE(S)	POSSIBLE CAUSE(S)	POSSIBLE CONSEQUENCE(S)
Traffic at work	<ul style="list-style-type: none"> <li>Traffic on public roads</li> <li>Machinery co-activity on a site</li> </ul>	<ul style="list-style-type: none"> <li>Vehicle traffic standard insufficiently known and implemented</li> <li>Accidents caused by third parties</li> </ul>	<ul style="list-style-type: none"> <li>Injury</li> <li>Death</li> </ul>
Work in confined spaces	<ul style="list-style-type: none"> <li>Work in sewers</li> <li>Work in a tank</li> </ul>		
Handling hazardous goods and chemicals	<ul style="list-style-type: none"> <li>Handling chemicals in laboratories</li> <li>Unloading chemicals</li> </ul>		
Hot work	<ul style="list-style-type: none"> <li>Use of an oxyacetylene torch</li> <li>Use of tools (grinder, etc.)</li> </ul>	Non-compliance with safety standards	<ul style="list-style-type: none"> <li>Injury</li> <li>Death</li> </ul>
Excavation and trenching works	<ul style="list-style-type: none"> <li>Landslide (earth instability)</li> <li>Landslide of an excavation open on one side</li> </ul>		
High-pressure hydroblasting	<ul style="list-style-type: none"> <li>Cutting and/or perforation by water jet</li> <li>“Whiplash” physical trauma, blows received from an out-of-control flexible lance head</li> </ul>		
Use of electricity	<ul style="list-style-type: none"> <li>Electric shock</li> <li>Electric arc burns</li> </ul>	<ul style="list-style-type: none"> <li>Non-compliance with regulations and industry standards</li> <li>Non-compliance with safety standards</li> </ul>	<ul style="list-style-type: none"> <li>Injury</li> <li>Death</li> </ul>
Lifting operations	<ul style="list-style-type: none"> <li>Hazards links to loads (slinging problems, etc.)</li> <li>Contact or collision of a crane or its load with people or facilities</li> </ul>		
Work at heights	<ul style="list-style-type: none"> <li>Work on a building’s flat roof</li> <li>Use of ladders</li> </ul>	Non-compliance with safety standards	<ul style="list-style-type: none"> <li>Injury</li> <li>Death</li> </ul>
Securing facilities	<ul style="list-style-type: none"> <li>Incomplete lockout of energies (electrical, mechanical, hydraulic, pneumatic, etc.)</li> <li>Equipment that can move by force feedback</li> </ul>		

### 3.3 SERIOUS ENVIRONMENTAL INCIDENTS

In degraded operating conditions or in the event of an accident, facilities operated by the Group can generate serious environmental incidents, as described below.

Risk category	EXAMPLE(S)	POSSIBLE CAUSE(S)	POSSIBLE CONSEQUENCE(S)
Releases and emissions into the environment	Exceeding regulatory thresholds for releases of wastewater treated by an effluent treatment plant	Technical failure of the system monitoring the quality of the wastewater to be treated	<ul style="list-style-type: none"> <li>• River pollution</li> <li>• Potential impact on human activities in the area concerned</li> </ul>
Fire/explosion on a Veolia site	Leak in a chemical storage room	Smoke detection system failure	<ul style="list-style-type: none"> <li>• Explosion</li> <li>• Interruption of operation</li> </ul>
Waste risks	Acceptance of hazardous waste on our storage sites	Error in the routing of the incoming flow of waste to be stored	Potential soil and groundwater pollution
Chemical risks	Contents of a lorry's tank spilled on the ground following a road accident	Non-compliance with the registration, traceability, and transport rules for our chemicals	Potential river, soil, and groundwater pollution

*N.B.: This vigilance plan does not cover the fight against global warming as this does not fall within the duty of care law's scope. This major issue, which is the collective responsibility of all stakeholders, requires everyone's involvement. Veolia's actions in this area are described in detail in the 2019 universal registration document, in particular in the extra-financial performance report (see section 6.2.3 – Contributing to the fight against global warming).*



## 3.4 TIER 1 SUPPLIERS AND SUBCONTRACTORS

Risk category	EXAMPLE(S)	POSSIBLE CAUSE(S)	POSSIBLE CONSEQUENCE(S)
Poor working conditions	<ul style="list-style-type: none"> <li>Inadequate employee training in health and safety</li> <li>No provision of personal safety equipment to employees</li> <li>Production equipment that may affect employee's health and safety (noise, odour, vibrations, processes using toxic substances)</li> </ul>	<ul style="list-style-type: none"> <li>Non-compliance with health and safety standards in force</li> <li>Non-compliance with the jointly approved provisions and systems provided for in the prevention plan</li> </ul>	Endangering the physical safety of supplier and subcontractor workers
Failure to respect freedom of association and the possibility of collective bargaining	Lack of dialogue between the management and employee representatives	<ul style="list-style-type: none"> <li>Unions not recognised by law</li> <li>Oppressive social environment with regard to workers' rights</li> </ul>	<ul style="list-style-type: none"> <li>Deterioration of the social climate among Veolia's suppliers and subcontractors</li> <li>Potential abuses of the rights of workers in Veolia's supply chain</li> </ul>
Environmental incidents within the supply chain	Harmful releases by supplier manufacturing sites	Weak environmental legislation in force	<ul style="list-style-type: none"> <li>Impact on the environment</li> <li>Deterioration of the health of supplier and subcontractor workers</li> <li>Health of neighbouring populations affected</li> </ul>
Forced labour	Immigrant workers who may be taken advantage of due to their migrant status	Unfavourable cultural and legislative environment	Rights of vulnerable workers: pay, paid leave, freedom to terminate employment contracts
Child labour	Children employed by a supplier or subcontractor	<ul style="list-style-type: none"> <li>Failure to implement local legislation on the prevention of child labour</li> <li>Sizeable informal economy</li> </ul>	<ul style="list-style-type: none"> <li>Negative impact on the level of education</li> <li>Injury</li> <li>Death</li> </ul>

## 4 Assessment

This section presents how Veolia meets the assessment requirement as laid down by the duty of care law. This review is based, in particular, on the work of the functional departments and the Internal Audit Department. The results of these analyses are detailed in section 5 – Actions.

### 4.1 MOBILISATION OF CONTROL LINES

The monitoring system deployed by the Group is based on the implementation of the “three lines of control<sup>(1)</sup>” model. The Level 2 role of functional departments aims to ensure that control procedures are properly implemented by the operational level (Level 1). Internal Audit<sup>(2)</sup> acts as Level 3 control and constitutes a function which purpose is precisely the assessment of organisational

performance. It therefore has the appropriate methodological tools and approaches to make a broader assessment of the effectiveness and efficiency of the systems in place in view of the law’s requirements.

### 4.2 DIALOGUE WITH SUBSIDIARIES

Actions taken at operational level are monitored in two manners: during Human Rights and Vigilance Committee meetings at which representatives of operations systematically attend and through regular reviews between the Group Human Rights and Vigilance Manager and their officers in business units (BU).

These exchanges contribute to a more fine-tuned management of the plan as they consider the points of view of subsidiaries. This approach thus avoids differences in perception between the functional departments and operational entities.

### 4.3 TIER 1 SUPPLIERS AND SUBCONTRACTORS

Veolia is committed to establishing long-term relationships with its tier 1<sup>(3)</sup> suppliers and subcontractors. This commitment is necessary and essential given the complexity of the production processes implemented by the Group.

The Group Purchasing Department applies a risk-based approach which targets strategic suppliers, key to ensuring the continuity of Veolia operations, with recurring expenditure and present in BUs or Group-wide.

These strategic suppliers as well as the non-strategic suppliers managed by the purchasing departments are assessed via a dedicated platform which analyses the social and societal responsibility performance of companies. At the end of this process, these companies are assigned a score which determines the possible implementation of actions by Veolia, based on the following categories:

- A: assessment score in line with Veolia expectations. The supplier in question is subject to standard monitoring;
- B: reassessment required every three years;
- C: reassessment required every year.

Actions following the initial assessment are presented in section 5.4.

(1) The three lines of defence model can be described as follows: in terms of risk management, management control is the first level of defence, the various risk control and compliance functions, the second, and the independent assurance function, the third. Each of these three lines has a specific role in the broader framework of corporate governance (The Institute of Internal Auditors, Position Paper, January 2013).

(2) Internal audits are independent and objective and provide an organisation with reasonable assurance on the level of control of its operations and guidance for improvement. It helps the organisation achieve its objectives by systematically and methodologically assessing its risk management, control, and corporate governance processes, and provides recommendations to reinforce their effectiveness (source: Ifaci).

(3) Suppliers and subcontractors with which the Group has a direct relationship.

## 5 Actions

### 5.1 WORK OF THE HUMAN RIGHTS AND VIGILANCE COMMITTEE

The Committee, the Group's key due diligence governance body, played an active role in implementing the law. The four meetings in 2019 focused on:

- monitoring action plans in operational areas via regular attendance to the Committee of compliance and/or sustainable development managers from these areas. This made it possible to discuss good practices, point out possible difficulties, and also ensure good policy and action alignment between the head office and operations;
- duty of care monitoring: given the short history of the French law in force, it is important to continue to monitor developments with respect to duty of care. This is all the more essential as this law is part of a more general legislative trend as other countries have adopted similar laws which already apply to certain regions the Group has operations in (United Kingdom, Australia);
- monitoring the activity of the departments concerned by duty of care, including, the Purchasing Department due to the importance of the supply-chain stake. The Group Purchasing Department detailed its 2019 programme in terms of responsible purchasing at one of the Committee's meetings: supplier site inspection report, purchasing compliance e-learning, strengthening of CSR purchasing objectives;
- developing the Plan: development was deemed necessary to meet the growing expectations of our stakeholders: more detailed plans and giving more room to effective risk prevention and remediation actions;
- commissioning fact-finding assignments: during the second quarter of 2019, a study on human rights for the Central and Eastern Europe region was completed at the Committee's request. It was grounded by the importance of migratory flows of workers in this region of the world (situation not specific to Veolia). This study did not reveal any proven risks in this area for the Group.

### 5.2 HUMAN RIGHTS IN THE WORKPLACE

#### 5.1.1 Priority issues

Veolia has been a member of the United Nations Global Compact since June 2003. Under this Global Compact, it is committed to supporting and promoting the ten principles relating to human rights, labour law, the environment, and combatting corruption. Veolia's principles of action also fall within the framework of international reference documents, including the Universal Declaration of Human Rights and additional pacts and the Organisation for Economic Cooperation and Development (OECD) guidelines for multinational enterprises. Respect for these fundamental rights is naturally included in the Group's human rights policy. The formalisation of the latter in 2016 led to the creation of the Committee in charge of managing Veolia's human rights system. The Group has also been committed for years to respecting the human rights of its employees, its subcontractors and suppliers as well as communities located in the regions in which it operates. This attachment to human rights is reflected in its sustainable development commitments as well as in the fundamental values and principles laid down in its [Ethics Guide](#).

Veolia's human rights policy addresses eight priority issues:

- three issues related to the rights of the populations affected by its activities:
  - right to a healthy environment and the protection of resources;
  - access to water and sanitation;
  - rights and respect of the lifestyles of local communities;
- five issues related to fundamental rights at work:
  - elimination of forced labour;
  - abolition of child labour;
  - elimination of discrimination;
  - promotion of freedom of association and collective bargaining;
  - right to a healthy and safe working environment.

The Human Resources Department and the Compliance Department are committed, with the Group's other functional departments and all the operational entities, to enforce these rights.

## 5.1.2 Implementation

### Fundamental human rights

- Veolia is one of the founding members of Business for Inclusive Growth (B4IG), an initiative coordinated by the OECD for inclusive growth launched in August 2019 during the G7 organised in France. A coalition of 34 major international companies has undertaken to take concrete action to advance human rights along their value chains, build inclusive working environments, and improve inclusion within their internal and external ecosystems. This initiative extends and supplements the efforts of the G7 countries to promote equal opportunities, address regional disparities, and fight gender discrimination. B4IG members operate in a wide range of sectors. They employ over 3.5 million people worldwide and have combined annual combined sales of over \$1 trillion. The B4IG coalition is the first initiative of this type led by companies.
- Veolia is also a member of the Entreprises pour les droits de l'homme (EDH – Business for Human Rights, in English) association which brings together 18 major French groups. This organisation focuses its efforts on the operational implementation of human rights and, by extension, the duty of care. EDH's vocation is to serve as a forum in which members can discuss the issues they face and best practices to overcome them.
- In June 2019, Veolia organised, with the World Business Council for Sustainable Development (WBCSD) and EDH, a morning of discussions on "Human rights and sustainable development objectives: involvement of CEOs, responsibility of companies and opportunities". As Veolia is resolutely committed to these issues, Chairman and Chief Executive Officer Antoine Frérot, co-signatory of the WBCSD's "CEO Guide to Human Rights", took advantage of this meeting to invite his peers to take action on these issues.

### Cohesion and social dialogue

To promote social dialogue quality and development, Veolia ensures that it is properly implemented at all levels of the organisation:

- at company or establishment level, where many subjects having an impact on the daily lives of employees are negotiated. Within Veolia, 1,247 social agreements signed at operation level supplement the Group's directives and agreements;
- at country level, which brings together joint information and dialogue bodies dealing with all national cross-cutting themes;
- at Group level, within the France and Europe Group committees.

### Role of Group committees

Veolia has set up, by agreement, a France Group Committee and a Europe Group Committee. The Europe Group Committee represents more than two-thirds of Veolia employees. It is composed of 16 countries: Belgium, Czech Republic, Denmark, France, Germany, Hungary, Italy, Lithuania, Luxembourg, the Netherlands, Poland, Portugal, Romania, Slovakia, Spain, and the United Kingdom.

Group committees are Veolia's key transformation players. They receive information on activity, the financial situation, and employment. They must be informed in the event of a restructuring, acquisition, or sale plan. They are also informed and consulted each year through discussions on the Group's strategic directions and their social consequences.

The agreements signed with trade unions at Group France level as well as the agreements in the form of joint commitments made within the Europe Group Committee attest the management's desire to structure quality social dialogue with employee representatives and thus contribute to the Group's action in favour of all its employees.

### Review of collective bargaining agreements

In 2019, some 1,250 new collective bargaining agreements were signed by establishments, companies, or Group bodies in each country. All of these collective agreements have an impact on the company's social and economic performance.

Forty countries were signatories to these agreements, but the top five were France, Japan, Germany, Poland, and Slovakia. As at end 2019, the number of employee representatives worldwide stood at 7,640. 204 strikes were recorded in 2019, representing 0.02% of the total number of days worked.

### France Group agreements and commitments made within the Europe Group Committee

Under the French employment protection act, two employee representative board members were appointed in 2014 respectively by the France and Europe Group committees to sit on Veolia Environnement's Board of Directors for four years.

In early 2020, an agreement on social dialogue quality and development within Veolia France was signed. This France Group agreement, which replaces the 2010 agreement on the same subject, provides, in particular, for the establishment of a global support, promotion, and recognition system managed as part of the trade union scheme.

In 2018, an agreement was signed in the form of a letter of undertaking with the Europe Group Committee on developments in business lines and skills, particularly with regard to the company's strategic directions, thus supplementing the Group management's joint prevention, health and safety commitments with the Europe Group Committee. In 2015, a France Group agreement specified the terms for discussions on strategic directions within the Group social bodies.

### Training for trade unions and employee representatives

Training employee representatives in their functions is essential to ensure quality social dialogue with regard to the Group's economic and social stakes. Training representatives also means recognising an essential internal stakeholder: the Group's employees and their representatives. As such, since 2010, Europe Group Committee members have received high-level training enabling them to more broadly approach the diversity of union cultures as well as the plurality of Veolia's businesses and its stakes. As part of the implementation of the European letter of undertaking signed on 30 May, 2018, Europe Group Committee members received training on "How to apply the European letter of undertaking on supporting the development of business lines and skills" in 2019 to enable them to share existing national practices in the field, prepare to disseminate and share the letter of undertaking within the social dialogue spaces of each country, and design in advance the work to prioritise commitments. French central union representatives can also follow certification training created in partnership with Sciences-Po Paris and the Dialogues association. Under

the France Group agreement of 2010, revised in early 2020, union seminars were organised by each trade union to help them better structure themselves and identify priorities in the Group's human resources policy. These seminars are held each year and include an open dialogue session with the Group's Human Resources Department. This new agreement on social dialogue quality and development, signed in early 2020, also provides for a comprehensive system for managing union careers and supporting representatives after their terms of office.

### Global Deal membership

In line with its sustainable development commitments, in particular with regard to guaranteeing diversity as well as fundamental human and social rights, Veolia joined the Global Deal initiative.

Global Deal is a platform initiated by the Swedish Government, relayed by the French Ministry of Labour, and developed with the International Labour Organization (ILO) and the OECD, founding partners of this initiative. It aims to face the challenges of globalisation of the economy and the labour market by developing, through social dialogue, a balanced and responsible approach. The Global Deal brings together various stakeholders: governments, companies, trade unions and other bodies at all levels (national, local, or global). Membership is based on three key areas: voluntary commitment, sharing knowledge in order to build open and responsible social dialogue, and sharing good practices between Global Deal stakeholders. Veolia's commitments and initiatives, as well as its social dialogue monitoring and assessment procedures, were mentioned in the "[Global Deal Flagship report](#)" jointly published by the OECD and the ILO. This publication explains how social dialogue is a response to the current challenges of the labour market and the globalisation of the economy. Veolia actively participates in Global Deal France working groups, in particular on the future of work and skills development. Veolia's skills-based international social dialogue experiment was presented in the publication "[Les membres du Global Deal s'engagent pour le G7 social](#)" (Global Deal members commit to the social G7).

### Diversity and discrimination

Diversity and discrimination are intrinsically linked, the promotion of diversity being a means of combating discrimination.

### Diversity policy

The Group is committed to ensure respect for diversity and fundamental human and social rights within the company. Diversity is a performance, credibility, and fairness issue. To encourage this, Veolia has implemented a policy based on the values of respect and solidarity between all employees for several years. Veolia therefore undertakes to guarantee equal opportunities, the recognition of everyone's talents, and to avoid any discrimination according to the criteria laid down by law. Two priorities were defined:

- guarantee fair and non-discriminatory human resources processes;
- guarantee the development of gender balance and gender equality.

### Diversity approach

The diversity policy is supported by a global network of officers who have the following tasks:

- implement commitments;
- establish diagnoses and action plans adapted to the context;
- measure the results;
- promote innovative actions aligned with Veolia's values.

In order to measure the impact of actions linked to diversity, Veolia monitors several indicators:

- workplace gender equality: percentage of employment of women, percentage of women in management, percentage of women who are executives, percentage of women sitting on the boards of directors of Group companies;
- disability: employment rate of individuals with disabilities;
- seniors: employment rate of the over 55s;
- young people: employment rate of the under 30s.

### Workplace gender equality

To attract talent and give roles to women, at all levels and across all of its businesses, the Group has planned an action plan dedicated to workplace gender equality, in order to:

- develop gender balance in operations;
- increase the number of women sitting on the Group's management bodies and working in management;
- promote gender balance in representative bodies.

To promote gender balance and workplace gender equality, Veolia has set itself quantified objectives:

- 40% women on Veolia Environnement's board of directors;
- 30% female executives in 2020;
- 25% female senior executives in 2023 and 40% in 2028.

As part of social dialogue, representatives from different countries of the Europe Group Committee and management have set up a working group on workplace gender equality with the objective of defining a diagnosis in order to develop action plans and joint resolutions within the European Committee.

### Support for United Nations LGBTI standards of conduct for business

In line with its CSR commitments, its human rights policy, and its membership to the Global Compact, Veolia has given its support to the United Nations standards of conduct for business with a view to combatting discrimination against lesbian, gay, bisexual, transgender, and intersex people. The five standards were developed by the Office of the United Nations High Commissioner for Human Rights.

### Deployment of diversity commitments

Numerous actions have been taken to promote Group diversity. They are developed via the human resources initiatives process. In 2019, 51 countries participated in the human resources initiatives collection where some 310 projects were collected. A dozen were presented in the social responsibility, diversity, and cohesion category, and 13 are featured in the “2019 Human Resources Initiatives” collection. The award in this category was presented to Colombia for an initiative to reconcile the integration of vulnerable people with environmental protection. There will be another human resources initiatives collection in 2020.

### Lasting partnerships

The Group is a partner and member of several organisations promoting diversity and equal opportunities, including the United Nations Global Compact. In June 2016, Veolia entered into a partnership with the association *Elles bougent* which organises field meetings for female A level students with female mentors, engineers, and technicians. Their accounts of their career paths show girls that technical professions are open to them. This partnership is an extension of the actions deployed by the Group’s Schools and Universities Relations Department. More than 40 events have been organised by the various Veolia entities on five continents (site visits, visits to schools, etc.) with the aim of showing girls that Veolia’s jobs are also made for them. These actions were carried out with more than 1,700 girls, in particular with the help of a couple of hundred Veolia workers worldwide. Veolia currently has about 130 sponsors in France.

### Gender balance within the Group

In 2019, the Group employed 21.1% of women and 27.3% of executives, and 18.2% of senior executives were female. 46% of Board of Directors members are women. Various initiatives in favour of workplace gender equality have been deployed in the different countries in which the Group has operations:

- Veolia’s internal network, WEDO, launched in 2016, dedicated to gender balance, brings together women and men working for Veolia who want to promote gender balance within the Group. This network, sponsored by two Executive Committee members, included over 2,000 employees from 48 countries in late 2019. The network is currently based on around 20 local networks on five continents which are in charge of developing and implementing local action plans. A first seminar for ten of these networks was organised in December 2019 in Brussels to share existing initiatives and collectively reflect on those to be implemented;
- a development programme called “Women in Leadership” (WIL), initiated by Veolia North America, has gradually been deployed

in other regions of the world: Europe (France, United Kingdom, Ireland, Germany, Spain, Belgium), Africa (Morocco), Latin America, and the Middle East. This nine-month coaching programme, which aims to create career development opportunities for women managers within the organisation, was followed by 60 women in 2019. WIL’s success is measured by its high satisfaction rate. In 2019, the programme obtained a satisfaction rate of 86% from participants and 86% from their managers. These results are further supplemented by an NPS of 66/100, which means that the majority of participants recommend the course to other women in the Group;

- in 2019, Veolia participated in a survey conducted in France under the aegis of the Higher Council for Professional Equality (HCPE) which focused on taking parenting into account in working life. It was deployed online to all employees in France. This survey helped draw lessons to improve existing action plans and initiate new systems fostering better work-life balance. More than 7,500 employees in France participated in this survey;
- regarding the workplace gender equality index that companies with more than 250 employees in France are required to publish, the results of Veolia entities in France are almost all above 75 points out of 100 (legal minimum) for a global index of 82 points out of 100.

### Employment and integration of people with disabilities

The percentage of Veolia employees with disabilities worldwide is 2.58%<sup>(1)</sup> as at end 2019, i.e. 3,579 employees. This rate was 3.9%<sup>(1)</sup> in France for the same year, and 10.4 million euros were invested in the protected workers sector. Veolia wants to change perceptions, develop representations related to disability, and support the integration of people with disabilities. The Group’s lines of action are:

- educate Group employees about disability;
- improve the retention of people with disabilities in their workstations by supporting them to have their disabilities recognised;
- support the ergonomic adaptation of workstations;
- encourage recruitment and support employers in the protected workers sector (ESAT [centres providing care through employment] in France).

On 18 November 2019, Veolia signed the “Manifesto for the inclusion of people with disabilities in the workplace”, a charter of operational commitments already ratified by around 60 companies in France, to:

- better accommodate pupils and students with disabilities (internships, work-study programmes);
- fight against stereotypes and discrimination;
- develop the digital accessibility of workstations;
- support sheltered employment companies and ESATs;
- integrate social criteria relating to disability in tenders.

Veolia has long been attentive to the issue of disability and has implemented action plans in the various countries in which the Group has operations. In 2019, several Group entities deployed awareness-raising campaigns aimed at better consideration of people with disabilities, in line with the legal framework specific to each country.

In compliance with local legislation, 4% of Veolia’s workforce in Ukraine are disabled and benefit from additional paid leave days and work part-time or flexitime.

In Sweden, Veolia works with the Swedish organisation Samhall

(1) Number of employees reported as disabled compared to the total workforce registered on 31 December in countries which report employees with disabilities.

which promotes the employability of people with functional impairments leading to a reduction in their work capacity. These employees work according to their individual capacities.

In France, during the 23rd Disabled Persons Employment Week, Missions Handicap des entités du V in Aubervilliers organised awareness-raising about hearing health by inviting employees to participate in an anonymous online screening test to detect hearing impairments, to register for a face-to-face meeting with a hearing care professional, and to participate in awareness workshops. Other awareness-raising actions have been implemented by other Group entities (SARP, Eau IDF, VEDIF, and RVD IDF): dys disorder workshops, giant disability game, theatre breaks (CO-Théâtre + Grain2Folie), Disability and Prevention desk with Klesia, help desk on job retention with occupational medicine (CMIE), and Managers Counter.

Portugal, inspired by an action implemented by Veolia Spain, has provided employees with an external and confidential service which responds to their doubts about their disability and provides

advice on the possibility of having some of their difficulties or limitations recognised as a disability.

#### Interculturality and religious diversity

Veolia is committed to integrating and respecting cultural differences (origins, languages, nationalities, etc.) in its organisation and operations. As such, Veolia Australia has developed two training programmes offered to all employees in order to strengthen relationships and respect between the community in general and the Aboriginal and island people of the Torres Strait. 675 employees have participated in this programme since 2015, and Veolia has undertaken to employ over a hundred Aboriginal workers by 2020.

In France, a good managerial practices guidebook on religious issues was deployed in 2017 to support day-to-day management and human resources managers likely to be confronted with this type of situation.

### 5.3 ACTIONS RELATING TO SERIOUS ENVIRONMENTAL RISKS

- Veolia's activities likely to impact the environment are mainly in the fields of water (drinking water, wastewater, industrial water), waste (treatment and recovery of all forms of waste including hazardous waste), and energy (cogeneration plants, local energy networks, building and industry energy services). The points to be closely monitored are, for example, atmospheric emissions (heating plants, incineration plants, CHP), the quality of liquid effluents in networks and at treatment plant outlets, the impact of waste and its treatment, explosion or fire risks, and the preservation of soil and biodiversity.
- At global level, in order to improve the management of its environmental impacts, the Group has implemented an Environmental Management System (EMS) in each of its BUs (country or equivalent), to:
  - measure and continuously improve the main points relating to environmental performance;
  - identify the main environmental risks linked to our operations and the corresponding prevention actions.

This system is regularly audited, with, in particular, a focus on environmental risk governance and monitoring in 2019, in cooperation with all the departments concerned. This allows the system to be improved in light of the audit findings.

- At operational level, due to the potential seriousness of the risks that can occur on its operating sites (waste treatment centres, waste storage centres, incineration plants, boiling houses, drinking water production plants, wastewater treatment plants, etc.), the Group implements various types of risk management and control actions:
  - the prevention of incidents likely to cause damage to property and, consequently, injuries or damage to the environment by implementing procedures aimed at, on the one hand, ensuring facility compliance and monitoring their operation and, on the other hand, better risk management. Environmental management is a way to implement this approach, in particular through an external certification procedure validating it (ISO 14001, sector standard, etc.);

- internal or external audits to identify and prevent industrial risks (fire, machine breakdown, environment, etc.). In 2019, the risk engineers of the Group's insurers carried out some 110 site inspections. These annual programmes provide regular monitoring of the most exposed installations over time.
- In addition, a Group Prevention Committee, in which several members of the Veolia Management Committee participate, is in charge of overseeing the fire risk control policy with the aim of improving fire detection, containment, and automatic extinguishing capacities on operating sites. This ambition is expressed in different manners:
  - the definition of technical standards validated by the risk engineers of the Group's insurance providers;
  - a multi-year investment plan of several tens of millions of euros.

The action plans approved by the Group Prevention Committee are jointly monitored by the Business Support and Performance Department and the Risk, Assurance, and Internal Control Coordination Department. These two departments regularly report on the level of deployment of the fire control programme to the Committee.

- Veolia's decentralised structure also allows operational entities to take initiatives that go beyond the Group's standards. The UK and Ireland are ISO 22301 certified, which is the international business continuity standard. These two countries have an integrated management system which strengthens their capacity to reduce environmental impacts of incidents occurring on their operating sites.

## 5.4 HEALTH AND SAFETY ACTIONS

### 5.4.1 Human resources initiatives

The Human Resources Department promotes health and safety projects. The Group is committed to promote ideas that contribute to improve employee working conditions. An internal initiative competition made it possible to put forward the following proposals:

- Saudi Arabia: production of a video promoting health and safety issues;
- Australia / New Zealand: 12 safety rules to save lives;
- Colombia: secure night work with flashing cones;
- United Arab Emirates: promotion of good prevention practices;
- Ecuador: safety cone projects;
- France: safety video at SARP. 3D tool for new employees;
- France: VigilANCE approach to reduce human-caused accidents;
- France: projects to strengthen synergies between performance and safety;
- France VigiSade: digitisation of health and safety vigilance;
- New Zealand: development of a safety line;
- Peru: a safety armband for new employees;
- United Kingdom: development of a methodology to better manage aggressions from the public with *Respect at Work*.

### 5.4.2 Group International Health and Safety Week

Veolia has organised an International Health and Safety Week since 2015 in order to anchor health and safety at work in the corporate culture. The main theme in 2019 was “working for a better future”. This highlight allowed each employee, whatever their country, region, or department, to acquire in-depth knowledge and a good understanding of risk prevention standards. In order to promote employee awareness, communication tools (posters, videos, roadmap, deployment guide) have been made available with the objective of reducing, or even eliminating, risky behaviour. Through the international mobilisation it created, this week made it possible to support, worldwide, actors in the field and to implement over 200 health and safety actions. It also served as a lever to meet the global “Objective: zero accident” challenge.

### 5.4.3 Management of high-risk activities

Veolia has developed management standards for its high-risk activities. High-risk activities can cause serious and/or fatal injury in the event of an accident. These standards provide for non-negotiable minimum requirements and apply to:

- all work that involves a high risk;
- all Veolia entities;
- in addition to the requirements provided by current legislation,

codes of good practice, international standards, and safety recommendations from manufacturers and risk prevention organisations.

As such, Veolia has developed a guide to support its operations in the proper deployment of these standards.

### 5.4.4 Health and Safety and work management standard

The Veolia occupational safety and health management standard was developed by the Prevention, Health, and Safety excellence centre, drawing inspiration from the good practices already implemented in the Group’s operations worldwide. This management standard is intended to help structure and define clear requirements to allow the management line to build and implement the continuous improvement plan which will be adapted to each BU.

The standard also contains a self-assessment table that managers can use to assess their compliance with health and safety management.



### 5.4.5 Site visits by Group senior executives

During regular visits to operating sites, senior executives used their time to discuss the importance of health and safety with operational teams. In Latin America, Spain, and Portugal, for example, there is a programme called “VIVIR/VIVER”, led by the Area Health and Safety Department, where directors and executives are educated on occupational health and safety and are trained in running “safety” inspections directly on sites deemed sensitive (landfills, factories, etc.). Participants in the training programme must subsequently carry out at least two on-site health

and safety inspections per year for support employees, and at least four per year for operational employees. The results of these visits are reported to the Area Health and Safety Department.

### 5.4.6 Operational integration

Following an organic acquisition or the award of a new contract, the heads of operating sites concerned receive an integration kit intended to enable them to align their health and safety practices with Veolia’s standards and good practices.

## 5.5 ACTIONS FOR OUR TIER 1 SUPPLIERS AND SUBCONTRACTORS

- Veolia is deploying a purchasing compliance programme that includes components related to human rights, health and safety, ethics, and environment.

The inclusion of a sustainable development provision in the Group’s supply and service contracts in 2018 also constitutes additional leverage for action. This provision imposes the promotion and respect of fundamental, economic, social, and environmental rights on suppliers. Finally, the Group supplemented these actions with a targeted awareness campaign for its buyers following the publication of the new version of the [Veolia Suppliers’ Charter](#) in 2019, a document in which the Group’s expectations are formalised in view of the issues raised by the duty of care law.

The Group Purchasing Department rolled out an e-learning certification in 2019 for all its buyers and purchasing managers as well as for the BU and Group compliance function.

The importance of taking into account issues linked to sustainable development, these being very close to the themes covered by the duty of care law, is recalled in this course.

As part of active supplier monitoring, the Purchasing Department deploys a site inspection solution focused on health, safety, environmental, and social issues. The reports drawn up, based on these inspections, supplement the action plans implemented by purchasing teams. This approach is in line with supplier assessments, the scores of which were not considered satisfactory (see section 4.3).

- From an operational point of view, Veolia’s subcontractors must comply with strict health and safety protocols. When they work on Group sites, they must observe a set of rules relating to their access, identification, and understanding of the risks inherent in the site’s activity. If they do not comply with these directives, they are not authorised to carry out the work for which they have been contracted.

One of the essential instruments for supervising subcontractors is the prevention plan. This procedure aims to implement a joint risk assessment process between Veolia and its subcontractors. Different methodological tools highlight the risks to which the two parties are exposed, in particular those generated by the co-activity of the Group’s employees with outside contractors, and risk dynamics can evolve according to the nature of the tasks to be accomplished. The conclusions of this joint assessment of accident factors are formally endorsed by the subcontractors, which bind themselves when they sign them.

- Veolia actively monitors duty of care controversies to which its suppliers may be confronted. One of them, challenged by trade unions regarding the treatment of its employees, was the subject of a specific review. The Committee continues to monitor developments in this case.

- Health and safety is a selection criterion appearing in the tender specifications for temporary worker framework contracts entered into by Veolia in France. The performance of these subcontractors in relation to this issue is then subject to regular review.

- One of the projects promoted by the Group as part of the 2019 human resources initiatives (see section 5.4.1) aims to encourage the subcontractors of our Polish operations to apply Veolia’s health and safety standards.

## 5.6 ASSOCIATED STAKEHOLDERS

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Under the 2015 agreement on the Group's strategic directions, the representatives of the France Group Committee bureau, the representatives of French trade union organisations, and the Europe Group Committee met in April 2019 to discuss the Group's strategy and its social consequences in the presence of senior executives in

charge of strategy and operations. These two days were the subject of additional questions and answers presented in plenary sessions. On this occasion, ethics, Sapin II law, and the duty of care were discussed by the joint bureau meeting, including the France and Europe Group committees.

## 5.7 EXTERNAL CONTRIBUTIONS

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In the second half of 2019, Veolia's Critical Friends were asked to assess the Plan. This committee is made up of a dozen personalities from associations, businesses, and academia, as well as representatives of the company's stakeholders, all experts in social and environmental issues. This committee is a place for collective reflection

intended to provide the company's senior management with the points of view of external observers on strategic subjects related to its social, societal, and environmental responsibility to develop and support the Group's continuous improvement process.

## 5.8 MONITORING OF BUSINESS UNITS

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The compliance, sustainable development, and human resources networks ensure effective monitoring of Veolia's human rights issues. As previously indicated in section 4 – Assessment, three or four quarterly meetings are organised between the Human Rights and Vigilance Manager, and each of the officers in the areas of the Group most exposed in terms of human rights (scope defined on the basis of current human rights mapping).

These interviews are an opportunity to review the progress of actions already undertaken, discuss the action plans envisaged, and review possible difficulties in the operational implementation of duty of care themes in the areas concerned. In particular, these meetings help better consider the local specificities of each area/BU within the framework of the Group's global human rights policy.

Environmental issues are monitored by Veolia's Business Support and Performance Department. Health and safety falls within the scope of the Human Resources Department.

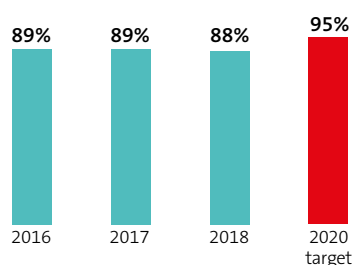
## 6 Key performance indicators

### 6.1 HUMAN RESOURCES

#### 6.1.1 Share of employees<sup>(1)</sup> covered by a social dialogue committee

Trends in social dialogue committee coverage rate

In 2019, 87.7% of employees were covered by a social dialogue committee.



This indicator makes it possible to ascertain the level of deployment of social dialogue agreements within the Group. These agreements are a privileged lever for action to guarantee the respect and implementation of employees' rights.

#### 6.1.2 Type of agreements signed (% of distribution between the categories)

Distribution of themes within the agreements signed worldwide

Remuneration and employee benefits	32.9%
Health, safety, or working conditions	12.6%
Working time organisation	27.3%
Social dialogue	14.0%
Skills development	5.7%
Other	7.5%

This table sheds light on the nature of the collective agreements signed within the Group. It is particularly interesting to note that those relating to health and safety and social dialogue, two themes widely covered by the Plan, jointly represent over 25% of agreements, demonstrating the importance Veolia attaches to these issues.

#### 6.1.3 Share of employees having followed at least one health and safety training course over the year

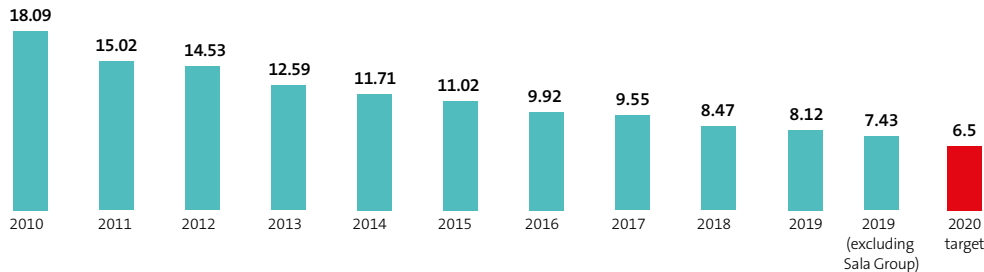


The constant progression of this indicator over the past four years illustrates Veolia's commitment to guaranteeing a healthy and safe working environment for its employees.

(1) As a reminder, Veolia employed 178,780 people on 31 December, 2019.

### 6.1.4 Work accident frequency rate

Trends in the work accident frequency rate since 2010



Frequency rate: number of accidents with lost time divided by million of hours worked.

The work accident frequency rate<sup>(1)</sup> is a highly revealing indicator of an organisation's health and safety performance. The steady drop in this rate over the past decade is the result of Veolia's strong policy. Note that the graph above shows two rates for 2019. The first at 8.12 corresponds to all of the Group's businesses. The second, restated without the Colombian company Sala acquired in 2019, stands at 7.43. This latter rate illustrates, on the one hand, that, at constant scope between 2018 and 2019, the improvement in the frequency rate would have been significant (-12%), and that, on the other hand, the integration of new businesses is a major issue for Veolia's overall health and safety performance, which is why it is deploying management tools, such as the integration kit mentioned in section 5.4.6.

## 6.2 ENVIRONMENT

### 6.2.1 EMS deployment rate



The EMS (see section 5.3) is a key tool for managing Veolia's environmental risks. Monitoring its level of deployment is therefore relevant and essential.

### 6.2.2 Additional management systems

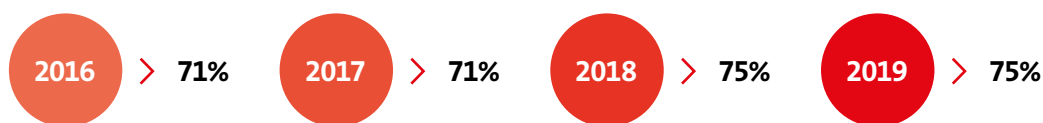
This common base is reinforced locally by additional integrated management system certifications, including ISO 14001 relating to the environment and ISO 9001 relating to quality management. Combined with the EMS, they contribute to improve the monitoring of Veolia's environmental risks.

#### 6.2.2.1 ISO 14001 certifications (in % of TO covered)



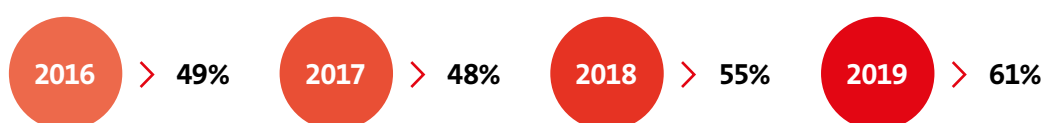
(1) Number of accidents with lost time divided by million of hours worked.

### 6.2.2.2 ISO 9001 certifications (in % of TO covered)



## 6.3 TIER 1 SUPPLIERS AND SUBCONTRACTORS

### 6.3.1 Percentage of strategic suppliers assessed



Assessing supplier sustainable development is an essential step to meet the requirements of the duty of vigilance law. After four years, the monitoring trend is clearly positive.

### 6.3.2 Sustainable development provision in supply and service agreements

Monitoring indicators	2016	2017	2018	2019
Involve suppliers	59%	57%	63%	71%

The inclusion of this provision in 2018 is a strong lever for action. This provision imposes the promotion and respect of fundamental, economic, social, and environmental rights on Group suppliers and subcontractors.

## 6.4 HUMAN RIGHTS AND FUNDAMENTAL FREEDOMS

To date, no convincing indicator, other than incidents reported by the whistleblowing system, has been implemented. The Committee will continue to study the best manner in which to monitor the Group's performance in this area.

## 6.5 WHISTLEBLOWING LINE

Alerts relating to the duty of care and reports via the internal system as of 31 December, 2019.

Total number of alerts (A)	13
Human rights / Discrimination (B)	1
Health and safety (C)	12
Damage to the environment (D)	0
Suppliers and subcontractors (E)	0

*N.B.: the cumulative total B + C + D + E may be greater than A, because some alerts may concern several categories.*

The first exercise to deploy the dedicated whistleblowing system was characterised by a relatively small number – for a Group of the size of Veolia – of reports on the duty of care with a very clear dominance of health and safety issues. The limited feedback available makes it difficult to draw an accurate conclusion as to this performance. The Committee will pay close attention to the development of these statistics.

## 2019 activity report

The Plan was developed in 2019 in line with the duty of care law which is intended to foster continuous improvement.

The governance of the vigilance system has been clarified. The Plan's structure has been redesigned to move away from the law's five-point breakdown showing Veolia's greater maturity as regards the application of said law. The development of sections on methodology and assessment illustrates better appropriation.

Risk mapping results appear representative of the state of risks linked to human rights, health and safety, environment offences, and damage to the supply chain that Veolia is confronted with.

The actions implemented to mitigate or prevent the risks relating to the duty of care law have been presented in detail and now constitute an essential component of the Plan. In addition, these measures provide an appropriate response to the law's concern for effectiveness from both a qualitative and quantitative point of view.

The selected performance indicators are considered relevant. Their number as well as their content may change, if necessary.

On the basis of this observation, the Human Rights and Vigilance Committee validates and adopts the Plan.



**Resourcing the world**

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