





# 3

## Corporate ENVIRONMENTAL, SOCIAL AND SOCIETAL RESPONSIBILITY

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### 3.1 Challenges and CSR policy

During the 2021–22 Financial Year, Eutelsat's management pursued its efforts to promote the awareness of social, environmental, and societal issues within the Group and beyond.

The previous financial years had been marked by several developments: establishment of a materiality matrix with the stakeholders, the Group's adherence to the principles of the United Nations Global Compact, inclusion of Environmental, Social and Governance (ESG) criteria in the qualitative objectives used to determine the Chief Executive Officer's compensation, formalised definition of the process used to identify non-financial risks.

In compliance with Article L. 225-102-1 of the French Commercial Code and Decree No. 2017-1265 dated 9 August 2017 enacted for the application of Order No. 2017-1180 dated 19 July 2017 on the disclosure of non-financial information by some major companies and corporate groups, Eutelsat discloses its non-financial performance statement. To this end it has collated information for the items pertaining to its business, and in response to the non-financial risks classified under the following fields:

- ▶ social;
- ▶ environmental;
- ▶ societal.

#### 3.1.1 CSR governance

A CSR Committee has been established under the authority of the Board of Directors, comprising four members of the Board, including Agnès Audier as Chair, two members of the Executive Committee and an employee representative. The Committee is led by the CSR team and meets three times a year.

A CSR Committee at operational level is coordinated by the Corporate Communications Department and includes three members of the Executive Committee (Chief Human Resources Officer, Chief Technical Officer, General Counsel). It meets twice a year. This Committee is tasked with ensuring that CSR is an integral part of the Group's strategic thinking and subsequently structuring the CSR policy.

During the spring of 2021, the CSR Committee carried out a review of CSR materiality for Eutelsat and its internal and external stakeholders, resulting in the materiality matrix as presented in Section 3.1.2 "Relations with stakeholders".

A CSR officer in the Technical Department monitors environmental issues, while two CSR project managers reporting to the Corporate Communications Department are responsible for project coordination, reporting and CSR communication. The Committee is supported by several specialised functional departments: Human Resources, Investor Relations, Institutional Affairs, Legal Affairs, Technical Department, General Services, Finance, Internal Audit, Risk Management, Operations and all teleports.

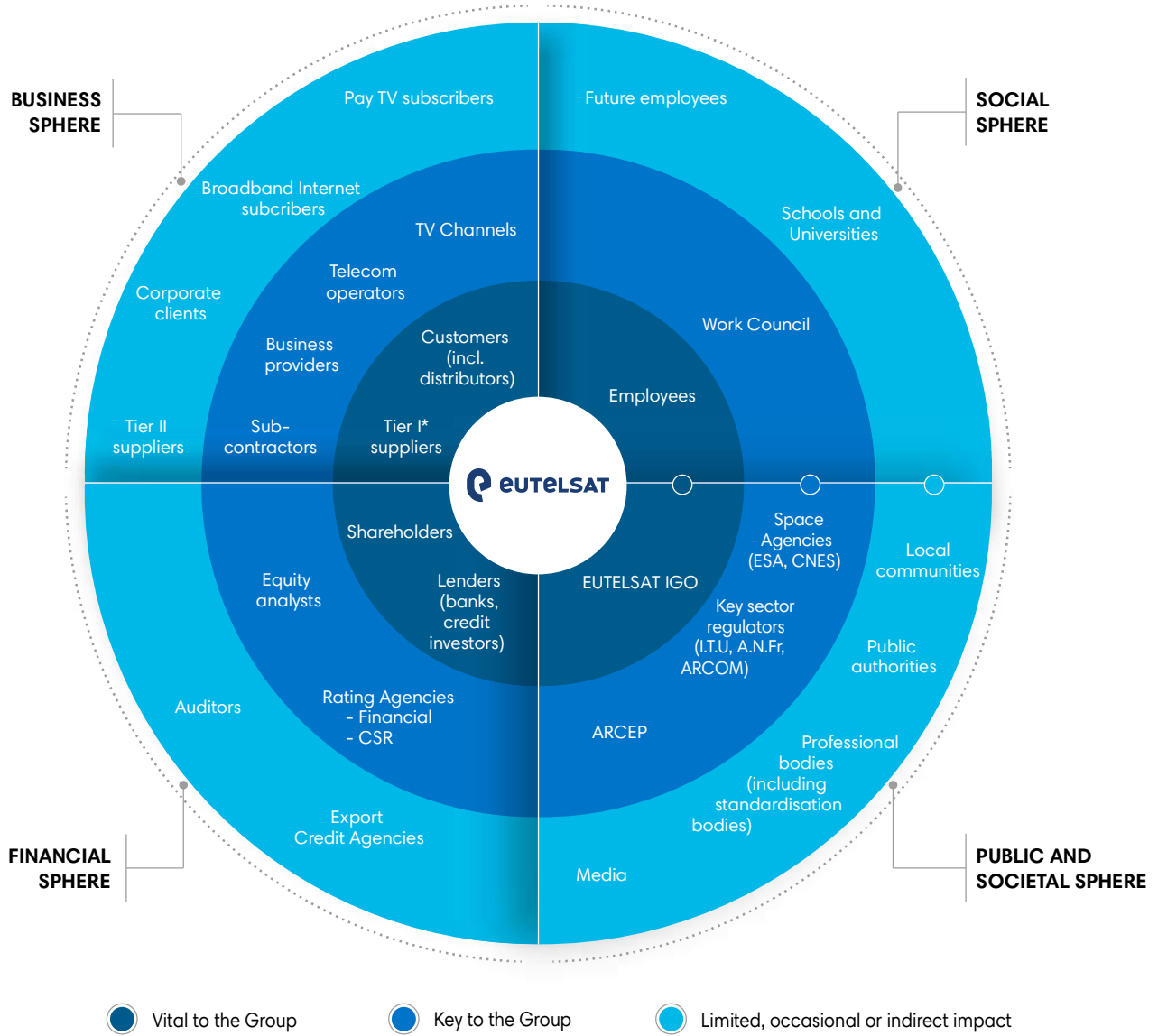
The values set out in our Code of Ethics govern management and business conduct. In addition, Eutelsat upholds the principles of the United Nations Global Compact and has published its first Communication on Progress Report in 2019.

A working group dedicated to establishing an environmental policy in response to the targets of the Paris Climate Agreement in terms of reducing greenhouse gas emissions has been set up, bringing together the Strategy, Technical, Finance and Corporate Communications departments.

#### 3.1.2 Relations with stakeholders

The transformation of exchanges and the ongoing development of digital technologies are leading to new challenges for Eutelsat and its stakeholders. The Group thus maintains a regular dialogue with its stakeholders to obtain information and garner various points of view that will help in its decision-making process.

The Group's main stakeholders are identified in the following matrix. The identification and ranking of stakeholders is structured around their degree of impact on the Group, the influence they may have on Eutelsat's decisions and on Eutelsat's participation in the activities of these different groups.



(1) Tier I suppliers mainly include satellite manufacturers, launchers, insurers, technology providers, suppliers of ground equipment.

The Group's international presence and the unique footprint of its worldwide fleet of satellites provide many opportunities to engage in a wide range of development and solidarity initiatives. This societal commitment can take different forms: vis-à-vis its external stakeholders, examples include the Group's participation in research

and development programmes that use satellite technology to protect citizens, support humanitarian relief initiatives and digital development, promote science and technology in schools, as well as support the non-governmental organisation EUTELSAT IGO.

### 3.1.2.1 Technology partnerships that help protect civilian populations

Eutelsat has signed technology partnerships with players from the space and the Internet of Things sectors to help develop innovative satellite resources to protect civilian populations and endangered species. As regard civilian protection, the EUTELSAT 9B satellite, operational since November 2016, hosts EDRS-A, the first payload of the European data relay system rolled out by the European Space Agency (ESA) and Airbus Defence and Space. EDRS-A has opened a space data highway, accelerating data flows between low-orbit satellites and their ground stations. The data flow system uses an on-board laser communication terminal, an inter-satellite link in Ka-band, and a Ka-band antenna, which transmits data from geostationary orbit to the EDRS ground stations. The response time required to conduct a wide range of operations such as monitoring natural disasters, emergency operations and coastal and maritime patrol operations has been significantly improved.

### Eutelsat mandated by EUSPA to develop EGNOS GEO-4

Eutelsat has signed a contract with the European Union Space Programme Agency (EUSPA) covering 15 years of service provision for the development, integration and operation of its next-generation EGNOS GEO-4 service on the future Eutelsat HOTBIRD 13G satellite. Since February 2020, Eutelsat has been operating the payload on board its EUTELSAT 5 WEST B satellite.

EGNOS is the European Geostationary Navigation Overlay Service that acts as an augmentation service to global positioning systems, to improve the reliability of positioning information. It is essential for maritime, rail and aviation transport systems. EGNOS also increases the positioning accuracy for other land-based applications, notably precision farming, geomatics, and civil engineering.

### 3.1.2.2 EUTELSAT IGO maintains a constant dialogue with the space community

Eutelsat maintains relations with the European Telecommunications Satellite Organization, EUTELSAT IGO, on environmental and social responsibility issues.

The intergovernmental organisation, EUTELSAT IGO, has permanent observer status with the United Nations Committee on the Peaceful Uses of Outer Space<sup>(1)</sup> (COPUOS) and as such participates in the meetings of the Committee and its two subcommittees, the Scientific and Technical Subcommittee and the Legal Subcommittee. In August 2021, EUTELSAT IGO participated in the 64<sup>th</sup> session of COPUOS which was organised in a so-called “hybrid” format. Under the agenda item “General exchange of views”, the Executive Secretary, Mr Piotr Dmochowski-Lipski, discussed EUTELSAT IGO’s activities since July 2019 and its relationships with key international organisations in the space and telecommunications sectors. On this occasion, the continued support of EUTELSAT IGO on the role played by COPUOS and its subcommittees in maintaining and enhancing peaceful cooperation in outer space was reaffirmed. In February 2022, the 59<sup>th</sup> session of the Scientific and Technical Subcommittee focused on topics related to space debris, space-system-based disaster management support and recent developments in global navigation satellite systems. The working group on the Long-term sustainability of Outer Space Activities adopted its new terms of

reference and work plan for the period 2022-2026. EUTELSAT IGO will continue to reaffirm its support for the role of COPUOS in maintaining and strengthening the peaceful cooperation in outer space and in safeguarding space and Earth for future generations through its participation as observer to meetings organised by the United Nations Office for Outer Space.

Since its joint establishment in 2010 by two United Nations specialised agencies, the International Telecommunications Union (ITU) and the United Nations Educational, Scientific and Cultural Organization (Unesco), the Broadband Commission for Sustainable Development<sup>(2)</sup> has sought to promote the adoption of effective and inclusive broadband policies and practices in countries around the world. As a Commissioner, the Executive Secretary has remained fully involved in the work of the Commission which main objectives are to promote the importance of broadband on the international policy agenda, to devise practical strategies that advocate for the development of broadband infrastructure and services and to ensure that the benefits of these technologies are made accessible to all people worldwide. At the Annual Fall Meeting of the Broadband Commission in September 2021, the Commission underscored the need to accelerate digital connectivity in order to facilitate the fulfilment of the 17 United Nations Sustainable Development Goals (SDGs) and re-affirmed that people-centred solutions must be at the heart of building a sustainable path towards universal broadband. As a member of the working group on “Digital Learning” the Executive Secretary contributed to the report on “Connecting Learning Spaces: Possibilities for Hybrid Learning”. In line with SDG4 on equitable access, the report stresses the importance of implementing hybrid learning strategies and provides guidance in order for learners to access meaningful and affordable technology while ensuring safety and privacy. Presently, the Executive Secretary is a member of two specialised working groups on Data for Learning, chaired by Ms Audrey Azoulay, Director General of Unesco, and of the Working Group on Artificial Intelligence Capacity Building, co-chaired by Ms Audrey Azoulay and Mr Pekka Lundmark, President and CEO of Nokia.

EUTELSAT IGO has the status of International Organization Operating Satellite Systems in all three sectors of ITU, which enables the Executive Secretary and the Secretariat to participate in ITU activities of relevance to the Organisation. The Organisation follows in particular the developments of the ITU Radiocommunication Sector<sup>(3)</sup> and the ITU Telecommunication Development Sector.

### 3.1.2.3 Materiality review

Eutelsat has conducted a materiality review showing the importance of CSR issues for its internal and external stakeholders and resulting in the CSR materiality matrix.

The issues reviewed were selected and proposed by the CSR team based on an internal analysis of the non-financial risks, a consultation process on the CSR reference frameworks and the issues reported by companies in the same sector: Eutelsat’s competitors, customers and suppliers.

This materiality matrix enabled the identification of Eutelsat’s priority CSR issues and avenues for work and collaboration to be established both internally and externally. These different issues were evaluated based on:

- ▶ their impact and importance for Eutelsat and its internal stakeholders;
- ▶ their impact and importance for Eutelsat’s external stakeholders.

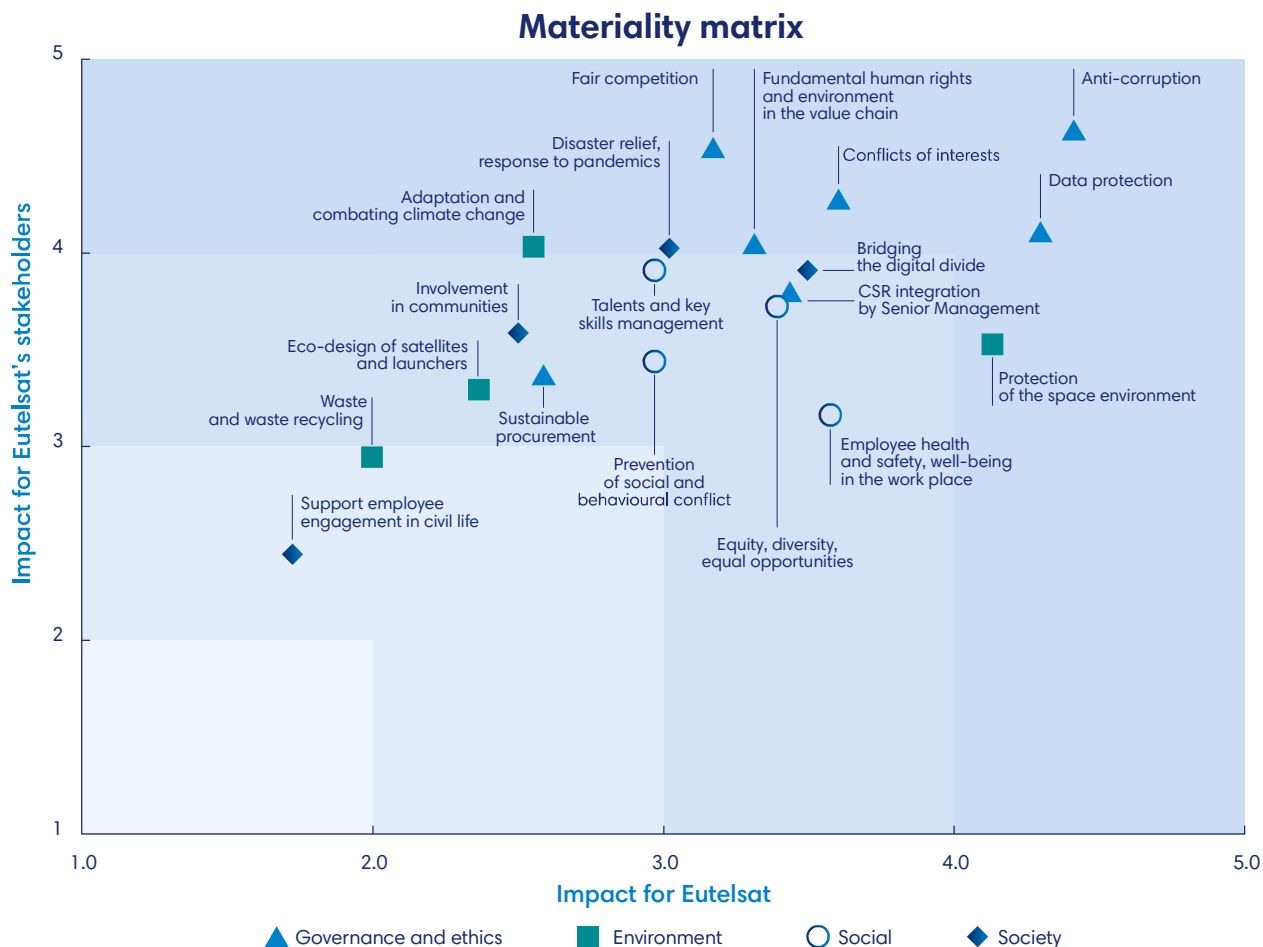
(1) <https://www.unoosa.org/>

(2) <https://www.broadbandcommission.org>

(3) <https://www.itu.int/en/ITU-R/Pages/default.aspx>

For the internal stakeholders, Eutelsat employees representing all the divisions and three members of the Executive Committee were consulted.

External stakeholders consulted: customers, suppliers, shareholders and Board Members, NGOs, specialised media, international agencies.



For some of them, this exchange opened up prospects for further collaboration on the CSR issues discussed.

The non-financial risks and opportunities outlined in the following chapter are the risks and opportunities which have been deemed to be material for Eutelsat by all of its stakeholders.

### 3.1.3 Main non-financial risks

Certain non-financial risks, particularly those related to corruption, have a likelihood/occurrence ratio that identifies them as specific risk factors that are likely to have a significant impact on the Group's financial situation. They are therefore described and discussed in detail in Chapter 4.

Other non-financial risks are risks whose occurrence does not have a direct material impact on the Group's financial situation, even if the efficiency and performance of certain operations could be affected. These risks may affect Eutelsat or its stakeholders.

The organisation put in place and the method used to identify and manage risks can also be found in Section 4.

The following non-financial risks have been ranked based on the scale of impact they could have on the Group.

**The Group could be faced with the risk of non-compliance with the applicable laws and regulations, in particular with regard to combating corruption and influence peddling, financial sanctions, personal data protection and competition law linked to relations with its stakeholders**

This risk could have a material impact on the Group's activities.

### Identification of the risk

See Section 4.4 for a description of the risk.

### Risk management and monitoring

For some years, the Group has been reinforcing its anti-corruption programme through dedicated governance, a network of correspondents, training and communication initiatives, and actions implemented under the Sapin II Act and AFA (French anti-corruption agency) recommendations. The Group has improved its anti-corruption policy with a change in the Group's whistle-blower hotline procedure and a 100% anti-corruption training rate. However, the Group cannot guarantee that the checks and procedures put in place will be able to detect and prevent all types of infringement.

### Space collisions and debris potentially impacting the Group's satellite operations

This risk could have a material impact on the Group's activities.

### Identification of the risk

With the increasing number of communications satellites in space, the issue of end-of-life of satellites and the potential debris generated in the process is becoming increasingly relevant. A collision between our satellites and certain types of space debris could lead to considerable damage to our satellites, thus affecting the Group's operations and leading to substantial financial losses.

### Risk management and monitoring

Positioned in geostationary orbit for an average period of fifteen years, the satellites operated by Eutelsat do not belong to the category that generates the most debris, unlike those in low or medium orbit. Nevertheless, Eutelsat has made a number of commitments and adopted procedures to de-orbit satellites reaching end-of-life and reduce the risk of pollution in space. When they reach end-of-life we thus reposition our satellites more than 200 kilometres beyond geostationary orbit, thereby respecting the international guidelines.

### Potential violation of value chain regulations

As a result of its activities and its relationships with suppliers and subcontractors, the Group could be exposed to a risk of regulatory violations in its value chain.

This risk could have a material impact on the Group's activities.

### Identification of the risk

In view of Eutelsat's high-tech environment and the activities of its suppliers, Eutelsat could be exposed to a variety of human rights risks (forced labour, non-decent working conditions, discrimination, and violations of freedom of association or expression), corruption and environmental risks involving direct or indirect third parties. This could be the case for the use of minerals from conflict zones or areas where human rights are not respected, and which are massively used in high-tech equipment.

### Risk management and monitoring

Eutelsat implements a policy of respect for human rights and freedoms through the deployment of the anti-corruption clause in its contracts. Eutelsat also abides by all CSR clauses and charters submitted by its customers. Eutelsat is also a signatory and member of the UN Global Compact, testifying to its commitment to promoting the respect for human rights.

### Eutelsat may face different risk factors linked to the health and safety of individuals

This risk could have a moderate impact on the Group's activities.

### Identification of the risk

Some of Eutelsat's activities, mainly at the teleports, may expose its employees or sub-contractors to various risks (installation and maintenance of equipment in teleports, exposure to electromagnetic waves, etc.).

Non-respect of the regulations or lack of measures relating to safety and quality of life in the workplace would cause accidents in the workplace which may have legal, operational and reputational consequences.

### Risk management and monitoring

Pursuant to French law, Eutelsat has implemented the Comprehensive Risk Assessment Document (DUERP) to evaluate professional risks, which lists all the risks for the Issy-les-Moulineaux sites and the Paris-Rambouillet teleport. This Document has been adapted following the Covid-19 public health crisis. A health and retirement scheme is available to all employees. For employees present at the teleport, training is provided on the risk of exposure to electromagnetic waves and testing is frequently carried out at the level of the installations.

### A lack of diversity and inclusion could impact the Group's activities

This risk could have a moderate impact on the Group's activities.

### Identification of the risk

In a globalised and multicultural world, a lack of diversity and inclusion could reduce the Group's attractiveness. Diversity is also a powerful level in innovation and creativity which enables the generation of new synergies within the Group. Lastly, since these are the expectations of today's society, not responding to them could adversely impact the Group's reputation.

### Risk management and monitoring

The Diversity Committee, established in 2019, steers the initiatives in favour of diversity, with a first objective of increasing the proportion of women within the Company by 1% by 2023 relative to 2020 and 5% more women in the top management (Top 100). The Committee steers the gender equality plan with the analysis of the impact of maternity leave on salaries and bonuses, the promotion of paternity leave, partnerships with NGOs sponsoring scientific training for young girls and the organisation of conferences to raise awareness of diversity issues. In addition, more than 47 nationalities are represented amongst the Group's employees while more than 15% of the employees hired during the financial year are non-French nationals.

### Eutelsat incurs a risk linked to talent and key skills management

This risk could have a moderate impact on the Group's activities.

### Identification of the risk

Eutelsat operates within a competitive environment which is constantly changing due to technological developments in the telecommunications sector and the arrival of new market entrants. Eutelsat could have difficulty in recruiting talented people and training employees in new skills enabling the Company to remain competitive and innovative.

**Risk management and monitoring**

With the One Eutelsat (corporate culture and professionalised management) and Bloom At Work (360° management and employee engagement) programmes, Eutelsat has been focusing for several years on the management of key talent and employee engagement. In 2020 and beyond, talent management will also draw on the new HR Information System for talent identification and succession planning. Under the guidance of the Human Resources Department, the programme is periodically presented to the Executive Committee.

In 2020, Eutelsat rolled out the Job Booster programme to hire 30 new key talents. Furthermore, 100% of the Group's employees have received training.

**The rapid growth in uses could call into question Eutelsat's commitment to reduce its environmental impact**

This risk could have a moderate impact on the Group's activities.

**Identification of the risk**

Given the nature of its activities, Eutelsat must deploy an appropriate environment policy to contain the surge in usage, particularly in the video, broadband and IOT markets. The explosion in usage and the increase in the quality of images viewed could lead to an increase in the greenhouse gas emissions produced by its customers.

**Risk management and monitoring**

To reduce its indirect environmental impact, Eutelsat has implemented a number of actions. The Group has received ISO 14001 certification for half of its teleports in Caniçal (Portugal), Cagliari and Turin (Italy). In addition, Eutelsat has developed a policy of promoting energy efficiency in its buildings and a policy of reducing travel to mitigate the carbon impact of its activities.

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**3.1.4 Opportunities for the Company****Bridging the digital divide**

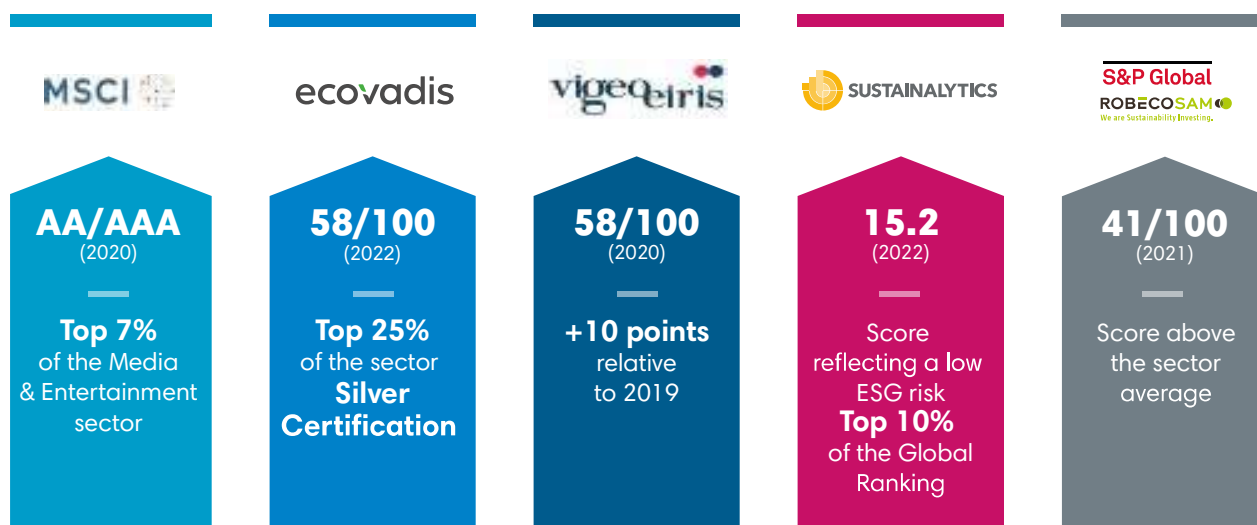
Eutelsat is a key player in the effort to bridge the "digital divide", which refers to discrepancies in access to information and communication technologies (ICTs), specifically to Internet and TV broadcasting. Downgrading of the services offered by Eutelsat, in particular for free-to-air television broadcasting or the provision of bandwidth, could widen these discrepancies.

The Group's policy in this area serves three purposes:

- ▶ provide Internet access to individuals, businesses and government agencies located in areas with little or no coverage by terrestrial networks;
- ▶ meet specific needs by fulfilling the public policy objectives of digital inclusion;
- ▶ promote access to free-to-air television for all homes.

**3.1.5 Awards for the CSR policy**

▶ An overview of Eutelsat's non-financial scores



Eutelsat has also obtained other scores in recognition of its sustainable development efforts. The Company obtained a score of 89/100 in the Gender Equality Index, placing Eutelsat among the leading companies for equality and diversity. It ranks in the SBF 120

Top 50 (2021 ranking of the proportion of female senior executives in SBF 120 companies, French Ministry of Gender Equality, Diversity and Equal Opportunities).



### 3.1.6 Eutelsat's contribution to the United Nations sustainable development goals

As a member of the United Nations Global Compact since 2019, Eutelsat contributes to the achievement of the sustainable development goals by operating in a sustainable matter to meet the needs of a constantly changing society.

	Goals	Achievements
	<ul style="list-style-type: none"> <li>▶ <b>4.3</b> Vocational training and higher education</li> <li>▶ <b>4.4</b> Skills and access to employment</li> <li>▶ <b>4.7</b> Education in sustainable development</li> <li>▶ <b>4.a</b> Accessibility of educational establishments</li> </ul>	<ul style="list-style-type: none"> <li>▶ 100% of employees (excluding Konnect) have received training</li> <li>▶ Support for associations and foundations in promoting the sciences, technology, engineering, and mathematics (STEM) and the related professions (CGénial and Ailes de France and Bricks 4 Kids foundations)</li> <li>▶ HappyTrainee certification</li> <li>▶ Promote access to education via governmental cooperation to facilitate access to digital in schools</li> </ul>
	<ul style="list-style-type: none"> <li>▶ <b>5.1</b> End all forms of discrimination</li> <li>▶ <b>5.5</b> Ensure full participation in and access to senior executive positions</li> <li>▶ <b>5.b</b> Technology and automation</li> <li>▶ <b>5.c</b> Gender equality policy</li> </ul>	<ul style="list-style-type: none"> <li>▶ Gender equality policy targeting a 5% increase in the percentage of women within the Top 100 and a 1% increase across the whole Group</li> <li>▶ 50% of the Executive Committee is composed of women</li> <li>▶ Deployment of a plan to promote professional equality and quality of life in the workplace in 2020</li> <li>▶ Support for the Women in Aerospace association Signatory of the StopE initiative, combating everyday sexism in the workplace</li> <li>▶ Awareness-raising of 100% of the employees in France to stereotyping and discrimination in the workplace</li> </ul>
	<ul style="list-style-type: none"> <li>▶ <b>8.2</b> Economic productivity</li> <li>▶ <b>8.4</b> Resource efficiency</li> <li>▶ <b>8.5</b> Full and productive employment, and decent work</li> <li>▶ <b>8.6</b> Promote youth employment and training</li> <li>▶ <b>8.8</b> Labour rights and safe and secure working environments</li> </ul>	<ul style="list-style-type: none"> <li>▶ Signature of collective agreements to improve employee well-being at work</li> <li>▶ Signature of a charter promoting the employment of young people in the Issy-les-Moulineaux municipality (Group headquarters)</li> </ul>
	<ul style="list-style-type: none"> <li>▶ <b>9.1</b> Develop sustainable, resilient and inclusive infrastructures</li> <li>▶ <b>9.4</b> Upgrade infrastructure and sustainable industrialisation</li> <li>▶ <b>9.5</b> Innovation, research and development</li> <li>▶ <b>9.c</b> Increase access to information and communications technologies</li> </ul>	<ul style="list-style-type: none"> <li>▶ Implementation of a policy to bridge the digital divide</li> <li>▶ Launch of 100% electric satellites</li> <li>▶ Implementation of the Space Debris Mitigation Plan (to reduce space debris) covering satellite station-keeping operations, satellite repositioning on geostationary orbit, measures in the event of anomalies, inclined orbit operational strategies and end-of-life operations</li> <li>▶ Founder member of the Net Zero Space initiative for the creation of a sustainable space environment by 2030</li> </ul>
	<ul style="list-style-type: none"> <li>▶ <b>10.2</b> Empower and promote inclusion</li> <li>▶ <b>10.3</b> Ensure equal opportunity</li> </ul>	<ul style="list-style-type: none"> <li>▶ Policy aimed at bridging the digital divide in regions where access to terrestrial networks is limited or does not exist. Collaboration with the different governments to promote Internet access</li> </ul>
	<ul style="list-style-type: none"> <li>▶ <b>13.2</b> Climate policy</li> </ul>	<ul style="list-style-type: none"> <li>▶ ISO 14001 certification for the teleports in Caniçal (Portugal), Cagliari and Turin (Italy)</li> <li>▶ Improvement in building energy efficiency</li> <li>▶ More than 15% reduction in CO<sub>2</sub> emissions thanks to a travel management policy between 2015 and 2019</li> </ul>
	<ul style="list-style-type: none"> <li>▶ <b>16.5</b> Reduce corruption</li> <li>▶ <b>16.6</b> Strong institutions</li> <li>▶ <b>16.7</b> Inclusive decision-making</li> <li>▶ <b>16.10</b> Ensure access to information and protect fundamental freedoms</li> </ul>	<ul style="list-style-type: none"> <li>▶ 100% of employees have received anti-corruption training</li> <li>▶ Actions in place to combat deliberate jamming</li> <li>▶ Availability of more than 2,300 free-to-air channels</li> </ul>
	<ul style="list-style-type: none"> <li>▶ <b>17.8</b> Scientific and technological capacity-building</li> <li>▶ <b>17.10</b> Equitable multilateral trading system</li> <li>▶ <b>17.17</b> Multi-player partnerships</li> </ul>	<ul style="list-style-type: none"> <li>▶ Collaboration with private and public players within the framework of our digital inclusion policy</li> <li>▶ Purchasing policy put in place respecting the international standards on corruption and business ethics</li> <li>▶ Permanent dialogue with the EUTELSAT IGO international organisation</li> <li>▶ Partnership with numerous governments in Africa to combat Covid-19</li> </ul>

### 3.1.7 Dashboard for Eutelsat's non-financial performance statement

Priorities	Policies and actions put in place (Code of Conduct, pledge, policy)	Key performance indicators	2021	2020	NFPS reference
Risks linked to corruption and business ethics	Eutelsat is exposed to the risk of non-compliance with the applicable laws and regulations on combating corruption and influence peddling, personal data protection and competition law, and with respect to all its stakeholders.	Percentage of employees having been trained in anti-corruption risk	100	100	See 3.2 "Integrity and ethics"
		Number of employees trained on GDPR			
		▶ General training	136	19	
		▶ Specific training	12		
		Percentage of suppliers adhering to our Code of Ethics	100		See 3.6 "Outsourcing and suppliers"
Bridging the digital divide	Eutelsat is a key player in the effort to bridge the "digital divide" which refers to discrepancies in access to information and communication technologies between populations, specifically to internet and TV broadcasting. Downgrading of the services offered by Eutelsat, in particular for free-to-air television broadcasting or the provision of bandwidth could widen these discrepancies.	Number of free-to-air channels broadcast on the satellite fleet	2,380	2,300	See 3.3 "Societal information"
Space-associated risk	With the increasing number of communications satellites in space, the issue of end-of-life of satellites and the potential debris generated in the process is becoming increasingly relevant.	Number of de-orbited and passivated satellites having reached end-of-life by 15 June 2020	113	113	See 3.4 "Environmental information"
		Number of satellites repositioned in geostationary orbit as of 15 June 2021	23	22	
Energy and climate change	Reduce the Group's direct CO <sub>2</sub> emissions and those resulting from all our value chain	Scope 1 & 2 GHG emissions	6,634		See 3.4 "Environmental information"
		Scope 3 GHG emissions	87,759		
Key talent	As a highly technical business, Eutelsat could be affected in the event of the disengagement or departure of key talent, or by an insufficient ability to attract new talent.	Percentage of employees trained	39	100	See 3.5 "Social information"
		Fulfilment rate measured by the observatory	8.2	8.6	
Diversity and inclusion	Eutelsat is focused on the diversity of its human resources as a means of embracing different viewpoints, promoting value creation and innovation, and avoiding discrimination and harassment.	% of women in the Group	33.7	33.8	See 3.5 "Social information"
		Number of nationalities in the Group	47	49	
Health, safety, and well-being in the workplace	Eutelsat is committed to providing a positive, safe and considerate working environment, at its own sites but also in all of the partner teleports.	Rate of absenteeism (Eutelsat S.A.)	1.87	4.12	See 3.5 "Social information"
		Frequency rate of occupational accidents (Eutelsat S.A.)	1.43	4.72	

## 3.2 Integrity and ethics

### 3.2.1 Commitment of the governing body

Integrity and ethics are key priorities for the Group. This is reflected in the governing body's commitment to fighting corruption and all forms of unethical business practices, and is demonstrated by all the interventions and measures put in place not only to prevent and detect corruption or influence peddling, but also to ensure compliance with regulations on personal data protection and competition law.

The appointment, in July 2021, of a Chief Compliance Officer, reporting to the Company Secretary and tasked, amongst other things, with the implementation and steering of the anti-corruption policy, illustrates the Group's ongoing commitment to ethical business practices.

The Code of Ethics was updated after Eva Berneke joined the Group and signed a new preface, underscoring her personal commitment and that of the Group, to combating corruption.

### 3.2.2 Compliance policy

#### 3.2.2.1 Compliance regarding the fight against corruption and influence peddling

During the financial year and in compliance with the French Sapin II Act, the Group continued to strengthen its compliance policy aimed at preventing and detecting cases of corruption and influence peddling, and to roll out the programme by taking the actions outlined below.

A corruption risk mapping exercise, launched in January 2021, was completed in July 2021 with a presentation on the results to the Compliance Committee, followed by the Executive Committee and the Audit, Risks and Compliance Committee, which noted the results and approved the related action plan.

#### Development and regular updating of internal policies regarding ethics and compliance

The Group is committed to observing the highest ethical standards in all the countries in which it operates. To formalise this commitment, and to ensure that it is enforced consistently across all Group entities, internal ethics and compliance policies have been developed and are regularly updated. This set of anti-corruption guidelines is regularly supplemented to address the risks identified through the mapping of corruption and influence peddling risks.

During the financial year, the Compliance Department established a new procedure to manage conflicts of interest, a Donation and Sponsorship procedure and an update to the Gifts and Invitations procedure. The Due Diligence procedures, including those relating to commercial agents, were updated to take into account the Group's new standard clauses on International Sanctions.

In parallel, the procedure for evaluating the integrity of suppliers was the subject of updating and overall simplification, to improve its clarity and appropriation by operational personnel.

#### Extension and automation of the pre-contractual due diligence on third parties

During the financial year, the Group maintained its efforts on pre-contractual due diligence with respect to third parties. In 2021, 2,930 World-Check verifications<sup>(1)</sup> were carried out. Based on the results

of corruption risk analyses, third parties fall into several categories based on their level of risk. In-depth investigation reports may be requested from ADIT, a company specialising in both open and closed investigations. This due diligence process is integrated into the internal operational procedures, in particular those relating to procurement and sales.

The indicators of activity and results are presented in paragraph 3.8.3.

#### Optimisation of the internal whistleblowing mechanism

During the financial year, the EthicsPoint external whistleblowing mechanism was updated to take into account the provisions of Directive (EU) 2019/1937 relating to the protection of whistleblowers, transposed into French law since then. This mechanism encourages the collection of reports and guarantees the protection and anonymity of whistleblowers. It is multilingual and is supported by whistleblower hotlines in the regions where Eutelsat has operations.

This whistleblower hotline, which is outsourced to an independent specialised service provider, guarantees the strict confidentiality of notifications and 24/7 availability in all countries in which the Group operates, including in Russia and China as of this financial year. It is regularly tested by the Compliance teams.

The Internal Rule has been updated to take into account all these elements involved in whistleblower protection. A dedicated fact sheet has been established to facilitate access to the EthicsPoint platform, notably indicating a QR Code to be used directly whenever necessary. This QR Code is linked directly to the mechanism. The procedure is reviewed during every meeting of the Audit, Risk and Compliance Committee. The Compliance Department has also established a whistleblower kit for the attention of all managers likely to have to deal with whistleblower notifications that may be received outside EthicsPoint.

During the past financial year, two whistleblower notifications were received, both of which via the EthicsPoint mechanism in March 2022. The first was internal and the second was launched by a third-party based internationally.

They both gave rise to the setting up of a confidential internal analysis team to verify the relevant facts. These investigations are steered by the Compliance Department.

(1) Comparison with the previous year's figures is not meaningful as the methods used to identify the assessed third parties changed during the financial year.

### Training programme intensification

The training programme on combating corruption and influence peddling is aimed at (i) all Group employees currently in post and (ii) on a more *ad hoc* and targeted basis, those employees most exposed to corruption risks, to ensure that they maintain and update their knowledge.

Mandatory online training campaigns are thus organised in two-year cycles for all Group employees, to ensure that they are provided with a consistent level of awareness and regular updates. The last phase of the 2020 campaign, realised in partnership with Walters Kluwer France, was launched in November 2021 and targeted, in particular, new employees recruited during the 2021 calendar year. Thus, of a target of 148 new recruits in post in November 2021, 135 were trained using an anti-corruption e-learning module, *i.e.* 96% of the target.

Special training sessions were also organised for employees who are particularly exposed to the risk of corruption: Area Managers and Regional Vice Presidents, *i.e.* around 100 individuals. These training sessions covered international sanctions on the one hand, and on situations involving risks of corruption on the other (particularly contracts with intermediaries, commercial agents, gifts, and invitations).

A new service provider has been selected for the next e-learning training programme. The training will be based on the Group's LMS tool, in order to target groups of 200 different employees every month, over a 2-year period. The first sessions are planned for September 2022.

On the occasion of the International Anti-Corruption Day on 9 December 2021, the Compliance Department also organised a special event for the Group's employees. This awareness-raising initiative took the form of a video of the Company Secretary, conveying the message "Say No to Corruption". This message was broadcast on screens at our sites in Europe and over all the Group's communication channels, notably via the Intranet. Owing to the public health context, no face-to-face events could be organised around this day. However, each subsidiary participated in their own way, principally using Teams, by organising webinars (MENA, EAS) or face-to-face sessions whenever possible (Italy).

### Monitoring and evaluation of the Internal Audit Department's actions

The Internal Audit Department has carried out two audits to evaluate the mechanism in place to prevent and combat corruption and influence peddling, articulated around the pillars of the French Sapin II Act, the last taking place in September 2020.

Internal Audit realised a follow-up audit on the implementation of the recommendations in this report in September 2021.

In parallel, the Internal Control Department established a detailed plan to verify the level 2 "accounting controls" within the meaning of the Sapin II Act and deployed this in the Eutelsat Group's main companies. This verification process was finalised in the 2022 second quarter.

The Internal Audit Department finalised the level 3 control plan and scheduled an audit to evaluate the mechanism as a whole over the course of 2022, following the completion of the verification process carried out by Internal Control.

The Internal Control and Internal Audit Departments submitted the report on the implementation of their verification plans to the Eutelsat S.A. Audit Committee in November 2021. The Audit Committee also approved the Internal Audit Plan and the Internal Control Road Map for 2022.

### Responses to the questionnaire published by the French Anti-Corruption Agency (hereinafter "AFA")

To comply in full with the Sapin II Act and the Guidelines published by the AFA in January 2021, the Group ensures that the responses to the AFA questionnaire are kept up to date. This questionnaire contains 200 questions relating to the mechanism for combatting corruption within the Company.

### 3.2.2.2 Compliance regarding personal data protection

During the year, the Group also pursued the implementation of its policy of compliance with the regulations on personal data protection, in particular Regulation (EU) 2016/679 dated 27 April 2016 ("GDPR") and French Act No. 78-17 dated 6 January 1978 as modified (known as the "*Loi Informatique et Libertés*").

At organisational level, the Personal Data Protection Officer (DPO), whose function has been outsourced, coordinates an internal network of correspondents within the subsidiaries and operational divisions. The Chief Compliance Officer is the Group's contact person for Data Privacy.

Correspondents have completed special training sessions organised by the DPO. This network ensures that correspondents are continuously aware of data protection issues and that information is circulated so that personal data protection and systems security issues can be addressed at an early stage of a project.

A tool enabling the maintenance of the data processing register has been chosen and is being deployed within the Group.

Factsheets together with standard clauses to be inserted in contracts based on the qualification of the parties have also been established and circulated to all the relevant internal players. The Compliance Department supports the Legal Affairs and the Operational teams regarding the contractual issues linked to personal data, and in the event of any data breaches.

An internal policy on the protection of personal data has been established by the DPO and posted on the Intranet. This policy aims to outline the Group's responsibilities and obligations under data protection regulations and instill a culture of data protection compliance and governance within the Group.

As part of its activities and with the support of its correspondents, the Compliance Department, assisted whenever necessary by the DPO, handles the requests from data subjects wishing to exercise their rights pursuant to the standards of the regulations.

Similarly, in the event of a personal data breach, procedures have been established enabling the DPO and the Compliance Department to document such cases and make the necessary notifications. When necessary, the Chief Compliance Officer works in close cooperation with the DPO and the Information Systems Security Officer. Konnect teams have received specific training on GDPR and data breaches.

### 3.2.2.3 Cybersecurity respect and reinforcement

To respond to the ever-growing issues surrounding cybersecurity, the Group applies substantial measures in this area. Since 2019, Eutelsat has thus deployed an Information System Security Policy together with an action plan to maintain an optimal level of cybersecurity.

To this end, the Group has implemented the security measures recommended by the European Network and Information Security Agency (ENISA) which ensure the same high level of security for all the information systems used by operators of essential services. Furthermore, the personal data protection policy is made available to all employees over the intranet portal. The Caniçal, Turin and Cagliari teleports, all the sites in Mexico, the Communications Control Centre

for the Paris-Rambouillet teleport and the Satellite Control Centre located at the Group's Issy-les-Moulineaux headquarters are all ISO 27001 certified, demonstrating Eutelsat's robust resources and ensuring a high level of data security with our partners.

#### Awareness-raising and training

In 2021, more than 360 of the Group's employees followed a cybersecurity training programme, making them aware of the procedures in place and giving them the tools required to protect their data. Following the arrival of a new Chief Information Security Officer in 2021, this training programme is expected to be stepped up in 2022. Within the framework of the ISO 27001 certification, all employees working in the certified entities have already followed at least one training session on cybersecurity.

### 3.2.3 Governance

In terms of governance, the Group Compliance Department has set up, and coordinates on an ongoing basis, an internal network of correspondents to promote the deployment of the compliance programme across all entities of the Group, by implementing local compliance actions, monitoring their effectiveness and reporting any perceived weaknesses. These correspondents are the Heads of Legal Affairs in certain entities. Quarterly meetings are organised for the members of this internal network, mainly using Teams.

In addition, the Group Compliance Committee meets every two months and is required to issue rulings on all matters related to the prevention and detection of corruption and influence peddling within the Group, and more broadly on all matters pertaining to ethical business practice.

In addition, compliance matters are regularly addressed during meetings of the Executive Committee. For information purposes the latter also receives the minutes of all Compliance Committee meetings.

A Compliance update is included on the agenda for every meeting of the Audit, Risks and Compliance Committee, as well as every Board of Directors meeting that follows these Committee meetings.

In parallel, at the end of 2021, the Compliance Department set up "OneTeam Compliance", an internal network of operational correspondents in charge of handling compliance issues. The major compliance-related topics are addressed to improve the Group's Compliance culture and ensure the effective circulation of the internal procedures. These meetings give rise to in-depth discussions and the network will be reinforced with new members in the coming months.

### 3.2.4 Consumer health and safety measures

Consumers use Eutelsat services through their Internet access or content providers. There are no specific measures relating to the health or safety of end-users.

## 3.3 Societal information

### 3.3.1 Helping bridge the "digital divide"

Satellite technology is an easy and reliable solution for broadband access and now for high-speed broadband access for homes and businesses located beyond the reach of terrestrial telecommunications networks.

According to the European Commission's most recent Digital Economy and Society Index (DESI) Report, published on 12 November 2021, 87% of the European Union's population is covered by so-called NGA (Next Generation Access) technologies capable of providing users with speeds of at least 30 Mbps. In rural zones, this figure drops to 60%, with 10% of homes not covered by any fixed Internet access network other than satellite. In Europe, it is estimated that 2%

to 3% of homes will remain without high-speed broadband access for an extended period. The digital divide is all the more flagrant in the African continent, where the deployment of terrestrial networks is much further behind and the proportion of the rural population significantly higher.

In this regard, satellites are an essential complement to terrestrial telecommunications networks.

In recent years, a new generation of high-throughput geostationary satellites has however emerged, with satellites that are more powerful and, above all, much more flexible than the previous generation. Eutelsat is again positioned as a global leader in this segment.

In January 2020, Eutelsat launched EUTELSAT KONNECT, a next-generation satellite dedicated to high-speed broadband. This satellite has been operational since mid-November 2020 and provides coverage of Western Europe and a large part of Sub-Saharan Africa. With this latest generation satellite, Eutelsat's capacity has considerably increased, enabling it to offer high speed broadband everywhere, with consumer packages at the price of a fibre subscription, from 30 euros per month (with prices adjusted to the standards of living in the countries covered). These consumer offers are marketed either through distributor partners (as in France and Italy) or by direct sale to consumers and businesses (via the WeKconnect brand).

The launch of the EUTELSAT KONNECT VHVS (Very High Throughput) satellite at the end of 2022 will see Eutelsat take a further step towards closing the digital divide in Europe. In April 2018, Eutelsat reaffirmed its commitment to bridging the digital divide by placing an order with Thales Alenia Space for EUTELSAT KONNECT VHVS, a next generation satellite equipped with hundreds of beams and a Ka-band capacity of 500 Gbps. This new satellite will be mainly dedicated to fixed high-speed consumer broadband and in-flight connectivity and will provide coverage of extended Europe from a geographical perspective, from the Canary Islands to Turkey and up to Iceland, as well as the southern part of the Mediterranean Basin.

The entry into service of EUTELSAT KONNECT VHVS in early 2023 will allow the entirety of the EUTELSAT KONNECT satellite's broadband resources to be allocated to coverage of the African continent, and to meet the ever-increasing needs of all users in terms of bitrates and data consumption. The fixed high speed broadband services provided by EUTELSAT KONNECT VHVS will be comparable to fibre-delivered services, with speeds potentially reaching up to 200 Mbps.

In recent years, the Group has also considerably strengthened its Ka-band HTS resources in regions in which the digital divide is most pronounced:

- ▶ **in Brazil, French Guiana and other Latin American countries**, with the launch and entry into service of EUTELSAT 65 WEST A in 2016;
- ▶ **in Sub-Saharan Africa**, with the marketing, as of 2016, of the next generation broadband services provided by the Al Yah 2 satellite then the Al Yah 3 satellite in 2018, both belonging to the operator Yahsat. Currently, the EUTELSAT KONNECT satellite offers broadband coverage to some 40 countries in Sub-Saharan Africa, including those with the largest populations such as the Democratic Republic of Congo, Nigeria and South Africa. Thus, since the end of 2020, the EUTELSAT KONNECT satellite has made it possible to offer broadband services to several hundred thousand households in almost all the countries covered;
- ▶ the C and Ku-band satellite resources provided by the Eutelsat fleet are now also being harnessed to reduce the digital divide in territories with strong disparities in terms of Internet access.

### 3.3.1.1 Serving specific needs by addressing the digital inclusion objectives of government policies

Satellite technology is particularly suited to the expectations and requirements of public authorities as it is capable of delivering high-quality and cost-effective Internet connectivity, with a quicker roll-out than other options, while avoiding the geographical constraints associated with mountainous areas.

In France, as part of the "Plan France Très Haut Débit" (France high-speed broadband plan), the government launched a scheme called "Cohésion numérique des territoires" in March 2019. This is an on-demand service available to all households and small businesses in France whose fixed broadband connection speeds do not reach 8 Mbps. Since 2019, grants of up to 150 euros have been available to finance part of the satellite equipment, installation, or commissioning. This scheme was improved in February 2022 by increasing the grants from 150 to 300 euros per household or business, and even up to 600 euros subject to conditions of resources (beneficiaries of minimum welfare support).

In Spain, a similar scheme has been in place since 2018 to subsidise equipment and installation with a maximum grant of 450 euros per household or company. Lastly, other large European countries plan to introduce equipment subsidy schemes to enable the populations in white zones to access high speed broadband by satellite, in the United Kingdom in particular.

Within the European Union, the transposition of the new Electronic Communications Code requires the Member States to put in place a universal high-speed broadband service. To achieve this objective on an exhaustive basis (guaranteeing the universality of access) and within a reasonable timeframe, satellites thus appear to be a key tool for operators subject to these new requirements, as a complement to their fixed or mobile terrestrial networks.

In the Americas, Eutelsat Americas provides capacity for various social connectivity programmes, notably in Mexico and Colombia, and is one of the leaders in the satellite sector for this type of programme. The latter are designed to connect rural communities and give them access to a broad range of services (schools, hospitals, libraries, etc.).

In Asia, Eutelsat Communications and the Rural Connectivity Group (RCG), a joint venture between New Zealand's three mobile network operators, announced the signature of a contract to deploy a telecommunications network in the Chatham Islands in New Zealand. This will enable businesses and individuals on the islands to access the 4G wireless broadband network.

In Africa, the public authorities are also beginning the crucial dialogue around digital inclusion and are calling on Eutelsat's connectivity services to ensure service continuity and equality for everyone across this vast continent.

In the Democratic Republic of Congo, for example, Konnect Africa, a subsidiary of the Group, has brought broadband to more than 400 rural communities hitherto beyond the reach of Internet networks. Also in the Democratic Republic of Congo, Konnect Africa has undertaken to connect thousands of schools to the Internet in partnership with Schoolap and Flash Services. The project provides schools with high-speed Internet connectivity, giving them access to a digital platform of officially recognised educational content. The first phase of the project has enabled the connection of more than 500 private schools and the project is still being rolled out. Furthermore, during the health crisis caused by the coronavirus epidemic, Konnect Africa offered free broadband access to the coordinating bodies involved in the response to the crisis in South Africa, Nigeria and the Democratic Republic of Congo. This enabled medical teams across the country to effectively coordinate their efforts by sharing information in real time, helping to combat the spread of the virus. In South Africa, over a six-month period, Eutelsat provided free access to eight healthcare facilities not served by terrestrial networks in the Mpumalanga province. With the help of the pharmaceutical firm

Aspen Pharmicare, the operation has been expanded to a total of 13 healthcare facilities, for one year.

More broadly, in many rural areas, satellite technology facilitates teleconsultation, allowing health centres in remote areas to hook up with university hospitals through satellite broadband connections. The support provided by satellite technology is key to combating the pandemic across Africa, particularly thanks to the instantaneous connection that allows for real-time reporting and optimal management of the epidemiological data collected.

Aside from the education and health sectors, the services offered by Konnect Africa are key in many other fields of interest to public authorities, including security and defence, remote administrative services, land use planning and business creation, not to mention public initiatives to promote local agriculture. The satellite solution is thus recognised as making a vital contribution to the achievement of the United Nations Sustainable Development Goals: zero hunger, combatting poverty, gender equality, good health and wellbeing, quality education, development of infrastructure, economic growth, sustainable cities, etc.

### 3.3.1.2 Promoting access to free-to-air television for all households

Eutelsat promotes access to free-to-air television for all households in France and around the world.

As of 31 December 2021, the Group was broadcasting more than 7,000 TV channels including 2,380 free-to-air channels, accessible without subscription on its satellites (i.e. close to 30% of all channels broadcast as of that date), to an audience of over one billion viewers, mainly in Europe, Russia, the Middle-East and Africa.

In France, the EUTELSAT 5 WEST B satellite launched in October 2019 enables its subsidiary FRANSAT's platform to distribute 26 free DTT channels (along with the 25 regional France 3 channels in HD, local and thematic channels, radio stations, and connected TV services) on a subscription-free basis. It is designed in particular for households with little or no terrestrial reception. Around two million households are equipped for individual or collective reception of the FRANSAT package.

FRANSAT is also a preferred conduit for local channels to broadcast to a wider audience across 100% of mainland France. For local authorities, small community cable networks in DTT black spots and isolated terrestrial broadcasters, FRANSAT provides "FRANSAT PRO", a satellite-delivered free-of-charge community DTT solution.

The FRANSAT service is regularly enhanced to improve the television experience for viewers: HD, Ultra HD, the "FRANSAT Connect" portal that allows viewers to browse the programme line-up and interactive services available in connected mode.

The FRANSAT platform is at the forefront in terms of Ultra HD broadcasting, with the FRANSAT Ultra HD channel which regularly broadcasts major sporting or cultural events such as the French Open at Roland-Garros or the FIFA World Cup in partnership with major broadcasters.

Within the past few years, Eutelsat's HOTBIRD video neighbourhood has become a benchmark orbital position for more than 135 million households in Europe, the Mediterranean Basin, and the Middle East, providing them with access to a rich line-up of over 1,000 channels broadcast in some 40 languages. The 13° East orbital position also offers the opportunity for populations living outside their country of origin to preserve a cultural link with the latter by receiving their national channels.

## 3.3.2 Eutelsat's commitment to humanitarian programmes

### 3.3.2.1 Engaging in humanitarian relief

Eutelsat is one of the original signatories of the UN Crisis Connectivity Charter, integrated with the work of the World Food Programme (WFP). This Charter, which was signed in late 2015 by GVF (Global VSAT Forum), ESOA (EMEA Satellite Operators' Association) and multiple satellite operators with the support of the Emergency Telecommunications Cluster (ETC) under aegis of the World Food Programme and the UN Office for the Coordination of Humanitarian Affairs, aims to provide governments and NGOs with immediate (within 24 hours) and resilient connectivity in the event of a major humanitarian crisis on four continents. It defines the framework for coordinating and working between stakeholders to optimise the arrangements and response times to telecommunications needs in emergencies.

The main commitments of the Charter include:

- ▶ pre-planned, scalable satellite-based solutions that can be deployed within 24 hours of a disaster and can be adapted to the specific nature of each operation;

- ▶ satellite equipment pre-positioned in Dubai at the UN Humanitarian Response Depot (UNHRD) for deployment within 24 hours to disaster areas;
- ▶ pre-allocated bandwidth, to allow priority access to Internet traffic for humanitarian relief purposes.

All assistance under the UN Crisis Connectivity Charter is provided free of charge.

Technical training sessions for humanitarian staff, in addition to crisis response simulations, have regularly been held since the signing of the Charter by Eutelsat and other satellite operators and integrators.

The Crisis Connectivity Charter became operational in spring 2018, with the signing of a contribution agreement between the United Nations World Food Programme (WFP) and Eutelsat, including around forty ground reception kits, and pre-allocated bandwidth on four satellites within the Group's fleet.

In February 2022, in the wake of the Batsirai cyclone which hit Madagascar, Eutelsat provided satellite equipment and in-orbit resources on its EUTELSAT CONNECT satellite in support of the World Food Programme's disaster relief coordination efforts.

Eutelsat is also a member of the Emergency Telecommunications Cluster (ETC). ETC is a global network of organisations that work together to provide shared communications services in humanitarian emergencies. Within the framework of its participation in this network, Eutelsat has donated two devices for training to the Gear Up scenario in Germany, for all the members of the Emergency Telecommunications Cluster. Eutelsat has supplied training, applications and telephone assistance to all the members of the network. In 2020, Eutelsat also represented the satellite industry within the Emergency Telecommunications Cluster.

Eutelsat has also been supporting Télécoms Sans Frontières (TSF) since 2007. The assistance provided by Eutelsat under this partnership allows this international NGO to fit out a community or crisis unit with broadband connectivity within a few hours to send data, video or voice communications.

Similarly, Eutelsat's partnership with TSF has been active for several years in large-scale conflict areas, helping to ensure near-continuous coordination of the various humanitarian relief operations carried out in the field.

With a view to further improving the response time of TSF's partner teams, and in addition to the resources already made available to the NGO, each year the Group donates multiple devices ready for use on aircraft.

In August 2021, the Group supported TSF following the earthquake in Haiti by providing the connectivity used to respond to the operational needs of the in-field NGO Médecins Sans Frontières.

Similarly, the Group has supported the NetHope NGO since 2004. Eutelsat has donated ten devices and bandwidth to support the humanitarian efforts carried on by the NGO in refugee camps in Uganda.

Eutelsat is directly committed to NGOs that are not specialised in telecommunications such as "Action contre la faim", by providing technical training for humanitarian staff.

### 3.3.2.2 L'arrondi solidaire – Solidarity in favour of local employment and micro-credit

These external initiatives and partnerships are accompanied by individual commitments within Eutelsat. They are accompanied by other initiatives such as "l'arrondi solidaire", where Eutelsat was the first French company to offer this programme in 2010, enabling employees to donate the euro cents from their salaries each month to charitable causes. The Company then adds 200% of the employee contribution which is then paid to local employment and microcredit charities such as "ADIE" and "Positive Planet".

## 3.3.3 Territorial impact of the Group's activities on employment and regional development

### 3.3.3.1 Supporting digital development in rural areas

Please see paragraph 3.3.1 below and also the "Serving specific requirements by addressing the challenges of public policies with regard to digital inclusion" Section in paragraph 3.3.1.1.

### 3.3.3.2 Promoting access to knowledge, a major challenge for development

Eutelsat actively supports the teaching of the sciences in schools and, in a more general sense, is proactive in education through its promotion of digital access.

The Group has forged close ties with students in the telecom and space sectors, in particular through its employees who teach in university courses. Educational partnerships are also implemented with a view to promoting student interest in science and technology.

In 2022, Eutelsat is again collaborating with the *Ailes de France* Foundation: created under the aegis of the *Fondation de France*, the *Ailes de France* Foundation aims to contribute to the awareness and promotion of the aeronautics and space world, for example by supporting educational, scientific, cultural and sustainable development projects, in particular in favour of young people. In partnership with the CNES (*Centre national d'études spatiales*), Eutelsat is participating in the project through the "Bourse ESPACE", by financing four scholarship funds enabling young people to continue their studies in the field of aeronautics and space.

### Eutelsat Supports the CGénial foundation and the Bricks 4 Kids association

In keeping with its commitment to fostering diversity, Eutelsat supports associations that raise awareness of science and science-related trades, particularly amongst girls. This year, the Company chose to support the the CGénial foundation in their efforts to attract young people to science and technology and help them along their career paths.

In France, Eutelsat is pursuing its ambition of developing the skills of young people by working with the CGénial Foundation on a crossover programme involving teachers and employees of the Eutelsat Group.

### 3.3.3.3 Impact on regional development and employment

Among the Group's sites, it is the teleports that participate most directly and actively in local economic activity owing to their implantation in peri-urban or rural areas.

The Paris-Rambouillet teleport in France offers some benefits to the local community in terms of employment and regional development, making it the second largest economic contributor in the Eure-et-Loir department. The Company thus uses local service providers for some of its activity and upkeep, namely:

- ▶ local firms for the upkeep and maintenance of the grounds surrounding the teleport, small repairs, restoration;
- ▶ a regional company for antenna installation;
- ▶ most technical products required for the proper functioning of the teleport are purchased from a local company in Rambouillet;



- ▶ local farmers by making land around the Paris-Rambouillet teleport available for organic farming.

Similarly, the Group's teleports in Mexico have a positive impact on local communities in that they promote local suppliers. Local businesses are called upon for gardening, maintenance, servicing or office supplies. In addition, support for the local community is provided through a number of activities including reforestation and grants to local NGOs and other organisations. The proportion of local suppliers is estimated at 75%.

At the Paris-Rambouillet teleport, in order to reduce the impact of increased traffic in the region due to its business, the Company

manages a shuttle-bus service between the teleport and Rambouillet town centre. Carpooling is also encouraged.

In a spirit of openness and with a view to promoting knowledge of the satellite industry, the Paris-Rambouillet teleport regularly receives visitors on site including schools, local elected representatives, local authorities, and journalists.

In Madeira, company presentations at local schools are frequently organised and the teleport teams regularly receive visits from students in partnership with their schools.

In June 2021, Eutelsat signed a charter in favour of young people living in Issy-les-Moulineaux, involving a commitment alongside the Issy-les-Moulineaux municipality to employing young people.

## 3.4 Environmental information

### 3.4.1 Global environmental policy

The Group's environmental policy is structured around two areas:

- ▶ satellite fleet management: space congestion and the environmental impact of a satellite's life cycle, a key component of the environmental policy. The Group applies a responsible fleet management approach in close partnership with satellite manufacturers and launch service providers to mitigate satellites' environmental impacts and conducts a proactive policy to reduce space debris;
- ▶ the environmental impact of Eutelsat's terrestrial operations: our teleports, all our operations and the impact of our value chain.

The Group is mobilised around applying a responsible approach to reducing the environmental impact of its terrestrial operations. After

the Caniçal teleport in Madeira teleport in 2017, the Cagliari teleport was granted ISO 14001 certification in July 2021, followed by the Turin's teleport in June 2022 in recognition of the guarantees provided on environmental risk mitigation. A similar certification process is under way for the Paris-Rambouillet teleport.

During the financial year, a strategic brain-storming process aimed at establishing an environmental policy through to 2030 was launched with the different CSR governance bodies, consistent with the Paris Climate Agreement adopted in December 2015. There are no provisions or guarantees for environmental risks, nor is there any ongoing litigation or potential risks concerning environmental issues within the Eutelsat Group.

### 3.4.2 Impacts of our operations on Space's environment

#### 3.4.2.1 Protecting the Earth's orbital environment to guarantee the sustainability of space operations

##### 3.4.2.1.1 Space debris management policy

Eutelsat's fleet of telecommunications satellites operates in geostationary orbit 35,786 kilometres (22,236 miles) above the Earth along the Equator, far beyond the Earth's atmosphere. The satellites remain at this distance from Earth for their entire operational life. When they reach end-of-life, approximately 15 to 20 years after entering service, they are re-positioned in a graveyard orbit, approximately 300 kilometres beyond geostationary orbit using the remaining on-board propellant. The satellites never return to Earth, nor do they re-enter the Earth's atmosphere.

Eutelsat is assessing the possibility to launch a constellation of low-orbit nano-satellites (known as ELO). Throughout their operational

lives (including decommissioning), the satellites will be operated in compliance with the French Space Operations Act (*Loi sur les opérations spatiales* – LOS) and the international regulations.

Since the early 2000s, Eutelsat has addressed the issue of space debris by implementing a policy of responsible management of such debris, combining its operational experience with recommendations from the international community.

Since 8 July 2005, Eutelsat has been certified for satellite control and operations (ISO 9001 standard).

In 2005, Eutelsat also established a Space Debris Mitigation Plan covering station-keeping manoeuvres, satellite repositioning in geostationary orbit, collocation strategies, anomaly remedial measurements, inclined orbit operations strategies and end-of-life operations.

This Plan is aligned with the international (issued by the Inter-Agency Space Debris Coordination Committee and the Committee on the

Peaceful Uses of Outer Space) and European guidelines (European Code of Conduct for Space Debris Mitigation), and with the criteria defined by the French Space Operations Act. Furthermore, Eutelsat's Space Debris Mitigation Plan sets out the requirements aimed at improving end-of-life and passivation operations, as well as minimising collision risks during operations. These requirements are more stringent than those contained in the regulations applicable to the Company and the Plan is updated on a regular basis to incorporate the new standards.

To date, thanks to the internal policies it applies, Eutelsat has re-orbited and passivated 23 satellites<sup>(1)</sup> that have reached end-of-life, with a 95% success rate, clearly outperforming the industry. All 23 satellites have been re-orbited in compliance with international guidelines and the French Space Operations Act since its coming into force, i.e. in such a way as to prevent them from re-entering the protected zone (+/-200 km from geostationary orbit) in the long term (over 100 years). Lastly, Eutelsat has placed 113 satellites<sup>(2)</sup> in geostationary orbit. All these operations were successfully conducted in compliance with the regulations governing collision risks and space debris generation. To mitigate collision risk, Eutelsat moves its satellites out of the geostationary corridor (+/-40 km above geostationary orbit) during the repositioning phase, and assesses collision risks with the help of USSTRATCOM data, the EU SST (Space Surveillance and Tracking) anti-collision service and information contained in the Space Data Association database.

The space debris management policy implemented by Eutelsat for many years makes the Company a responsible global satellite operator maintaining high standards and making constant efforts to protect the Earth's orbital environment and the sustainability of space operations.

### 3.4.2.1.2 Compliance with the French Space Operations Act

The French Space Operations Act, published in the *Official Journal* on 4 June 2008, was the direct result of France's international obligations in respect of the different United Nations treaties<sup>(3)</sup>. Its entry into force on 10 December 2010 validated Eutelsat's responsible approach to fleet management.

The Act underscores the need for a responsible approach to fleet management and establishes a regulatory framework within which Eutelsat operates in collaboration with the French Ministry of Higher Education, Research and Innovation and the CNES (*Centre national d'études spatiales*) to meet its obligations regarding in-orbit control of space objects.

The technical authorisations and licenses delivered by the Ministry of Economy, Finance and Recovery under this Act are managed by the CNES. Eutelsat cooperates with the CNES during every stage of a satellite's life. Before a satellite is authorised, the CNES reviews the technical documentation with Eutelsat. After obtaining clearance, Eutelsat invites the CNES to its technical reviews in order for the CNES to verify the correct application of the technical regulations. Finally, Eutelsat informs the CNES of any incidents occurring on a satellite and/or any change in orbital position.

As part of discussions with the CNES with a view to obtaining authorisations, Eutelsat specifies its strategies for depleting the resources of a satellite in a way that limits any increase in space debris, or for permanently deactivating all means of generating

power on board the satellite. Eutelsat also demonstrates that it has sufficient resources to conduct de-orbiting operations and provides a probability calculation for their successful completion. Finally, Eutelsat provides the CNES with a study of the dangers posed to populations, the environment and public health, in particular the dangers associated with the generation of space debris (in the event of a collision with another space object, for example), as well as a plan to address the risks of accidental collisions.

From the outset, the best practices adopted by Eutelsat have enabled the Company to comply with the requirements of the French space legislation and the Group continues to be a responsible operator, committed to the avoidance of space debris.

### 3.4.2.1.3 Sharing Eutelsat's policy and practices

The proliferation of space debris has become a major issue for space operators and, with this in mind, Eutelsat is committed to pursuing the implementation of its responsible fleet management policy in close cooperation with satellite manufacturers and launchers.

In 2011, Eutelsat became an Executive Member of the Space Data Association (SDA). Bringing together satellite fleet operators, the SDA is tasked with assessing the risks of potential close approaches on the geostationary orbit and the Low Earth Orbit and sharing information with a view to mitigating RF interference.

Eutelsat is also involved in many events and workshops organised throughout Europe on space debris management. More specifically, the Group plays an active part in two key events organised by the CNES on a regular basis: the Workshop on End-of-Life Operations (biannual) and the annual Working Panel on outer space debris. It also monitors the work of the ESA and other relevant international institutions.

In 2013, Eutelsat also presented its internal policy and provided feedback on the French Space Operations Act at a workshop hosted by the "Long-term Sustainability of Outer Space Activities" working group of the UNCOUOS Scientific and Technical Subcommittee. In addition, Eutelsat has regularly reported on its experience following the implementation of the French legislation during consultation sessions hosted by the CNES in 2013, 2017 and 2018.

Eutelsat also works closely with an array of stakeholders on issues surrounding sustainability and preservation of the space environment. As an experienced and responsible satellite operator, Eutelsat is notably planning to join the working group on space traffic management (STM) within the European Cooperation for Space Standardization (ECSS), the only forum in Europe where such matters are addressed from a technical perspective.

On the occasion of the recent Paris Peace Forum, Eutelsat was one of the founder members of the Net Zero Space initiative, supported by several leading players in the space industry. The aim of this multi-player international coalition is to enable the creation of a sustainable space environment by 2030, by taking concrete actions to limit and reduce the generation of debris orbiting the Earth. The Net Zero Space initiative enables Eutelsat to reaffirm its long-standing commitments in favour of a safe and uncongested space. The management of the satellite fleet, the prevention of space congestion and the reduction of the environmental footprint over the entire satellite life cycle thus constitute the main pillars of Eutelsat's environmental policy,

(1) Number as of 11 May 2022.

(2) Number as of 7 May 2021.

(3) In particular, the 1967 Treaty on Principles Governing the Activities of States in the Exploration and Use of Outer Space, including the Moon and Other Celestial Bodies.

Supported by more than 40 years' experience at the service of telecommunications, Eutelsat sees the integration of the environmental aspects linked to space as a key element in the success of its operations and of its long-term strategy. Environmental protection and the maintenance of a clean and uncongested space is also an integral part of the four major principles that underlie the Company's corporate social responsibility policy.

### 3.4.2.2 Managing the environmental impact of our major space suppliers

#### 3.4.2.2.1 Satellite manufacturing

Eutelsat is currently procuring satellites from two of the world's major satellite manufacturers: Airbus Defence and Space S.A.S. (Airbus Group) and Thales Alenia Space (Thales & Leonardo Group). Each of these manufacturers has adopted policies to minimise their environmental impact and promote sustainable development and comply with international regulations on space debris. As EU manufacturers they are also subject to the EU REACH regulations to secure the production and use of chemical substances.

**Airbus Defence and Space** continuously considers the environment at all stages of its operations, striving to minimise its industrial footprint and aiming to develop eco-efficient products throughout its lifecycle. The company complies with all applicable environmental regulations and its sites are ISO 14001 certified. In 2021 Airbus scored A- for its CDP climate change disclosure and reports on environmental issues using the Global Reporting Initiative standards. In 2019 Airbus set and implemented ambitious environmental reduction goals for 2030 against a 2015 baseline through its high5+ plan. In 2022 Airbus amended its high5+ plan to commit to a new 2030 ambition to reduce its industrial emissions (Scope 1 and 2) by 63% compared to 43% previously.

### 3.4.3 Pollution on Earth

#### 3.4.3.1 Circular economy

##### 3.4.3.1.1 Waste prevention and management

The Group is committed to observing best practices in the management of waste generated in its offices. Since 2010 in Mexico and 2015 in Paris, Eutelsat has pursued a rigorous programme to reduce paper consumption and recycle waste in its offices. The programme includes replacing printers with multifunction copiers with badges and reducing the number of photocopiers to lower paper consumption and using FSC or EU/Ecolabel certified paper.

Eutelsat S.A. has implemented several waste management measures:

- ▶ sorting of waste: paper, cardboard, glass, ordinary industrial waste (OIW) using dedicated collection bins;
- ▶ installation of waste bins for paper collection in offices and locations frequently used by employees (photocopiers);
- ▶ daily removal of waste;
- ▶ confidential document destruction by shredding truck;
- ▶ recycling of paper, cans, PET (plastic bottles) via Paprec/La Corbeille Bleue;

**Thales Alenia Space (TAS)** is part of the Thales Group which since 2007 has had an environmental protection policy seeking to reduce energy consumption, CO<sub>2</sub> emissions, waste production and increase recycling. TAS has ISO 14001 Environmental certification for both its sites and products and its main energy consuming sites are certified ISO 50001 for Energy Management. In 2021 TAS implemented solar power generation in various production sites, LED lighting in cleanrooms and modernised office heating/cooling systems. Its ground products are being modified to reduce their CO<sub>2</sub> emissions and it has started Life Cycle Assessments on its new space missions. TAS is also actively involved in initiatives to address sustainable development in the space industry.

#### 3.4.2.2.2 Launch services

As a satellite operator, Eutelsat does not itself launch satellites, but uses launch service providers such as Arianespace, the latter having launched Eutelsat's most recent satellite.

**Arianespace** seeks to promote a sustainable vision of space and pursues its efforts to protect the environment in all activities at its launch site in Kourou, French Guiana. The launch facility's environmental management and energy management systems are, respectively, ISO 14001 and ISO 50001 certified. In 2021, at the 4<sup>th</sup> Paris Peace Forum, Arianespace was one of the first companies to sign the Net Zero Space charter, designed to reduce space debris by 2030 and foster more sustainable use of space for humanity. ArianeGroup, Arianespace's main shareholder and supplier, is also engaged in addressing the issue of space debris including, amongst other activities, designing the upper stage of Ariane 6 to allow de-orbitation and taking part in ESA's working groups on the sustainability of space operations.

- ▶ WEEE (electrical and electronic waste) from discarded electrical or IT equipment is either donated to associations for those in operation or disposed of by authorised companies.

The Group's international subsidiaries have also implemented consumption reduction procedures and the sorting of waste for recycling. One hundred per cent of electrical and electronic waste is recycled by external service providers at all the Group's sites. Most of the obsolete IT equipment is also given to external service providers who are responsible for its recycling.

#### 3.4.3.1.2 Water consumption and supply in relation to local constraints

The sites which consume the most water are the headquarters (Paris) and the teleports. The office air conditioning systems in Paris account for the highest consumption of water, with peak levels during the summer. The water supply system at the Paris-Rambouillet teleport was refurbished in 2018, with a separate supply for teleport operations and fire-fighting networks. A monthly measurement is carried out for each network to ensure the precise monitoring of consumption.

At the Caniçal teleport in Madeira, rainwater is stored for irrigation and a rain sensor is used to avoid wastage. Water consumption is measured on a monthly basis and a report drawn up on any potential leaks. A rain detection system has been installed to ensure a maximum reduction in water usage.

For Eutelsat Americas, the water consumption shown corresponds to that of the Iztapalapa and Hermosillo teleports; consumption at the headquarters is not monitored. Consumption is kept to a minimum, with no watering of green spaces in Iztapalapa and very little watering in Hermosillo (located in the desert), where the local government applies restrictions on the use of water. Similarly, the water from the air conditioners is used to irrigate green areas. The Group is maintaining its efforts to cover all areas and use the minimum consumption of water without affecting the plants.

	2021	2020
Water consumption (in m <sup>3</sup> )	15,737	11,623

### 3.4.3.2 Mitigating the Group's energy and climate impact

#### 3.4.3.2.1 Reducing the energy consumption of our facilities

Much of the Group's energy consumption is the result of cooling and heating operations for the teleports used for establishing two-way connectivity between the Earth and its fleet of satellites. During the summer months, electronic equipment must remain at constant temperatures, so an air conditioning system is used. During the winter months, when cold weather is forecast, antennas used to uplink signals to satellites must be heated so as to ensure their proper functioning. The Group has thus gone to great lengths to reduce the teleports' electricity consumption.

Various actions have been rolled out at the Paris-Rambouillet Teleport, including:

- ▶ intensive use of de-icing with anticipation of weather conditions and gradual implementation of a system for supplying fresh air from outside the buildings (free-cooling);
- ▶ a pilot passive de-icing system for antennas measuring up to 3.8 meters has been installed on some 20 antennas. It avoids the consumption of energy (electricity or other) for heating the antennas in winter.

Energy audits are made and show that the energy consumption is optimised for the site (60% business, 40% environmental).

In Italy, an energy audit of the Centallo and Cebrosa sites in the Turin region has resulted in the following actions:

- ▶ implementation of new uninterrupted power supplies;
- ▶ implementation of an energy management system.

A new air conditioning system has been installed to reduce electricity consumption while a plan to install solar panels has been approved for on-site implementation as of 2022.

At the Cagliari teleport, the project to install photovoltaic panels was completed in October 2021. Furthermore, a new air conditioning system using much less energy is now in place.

At the Caniçal teleport in Madeira, photovoltaic panels have been installed since 2017 and measures to reduce energy consumption are in place. Preventive maintenance is carried out on the systems to avoid over-consumption of electricity. The lighting system has also been replaced with a more-energy-efficient LED system.

Eutelsat Americas has been implementing energy-saving measures for many years: priority use of natural lighting, low-energy light bulbs, motion sensors to control lighting in all common areas. For the offices located at Eutelsat's Paris headquarters, "green committees" bringing together suppliers, the owner of the premises and the maintenance service provider are organised to identify measures to save electricity consumption, such as the use of a BMS (Building Management System) or the installation of low-energy light bulbs. Awareness-raising initiatives are regularly carried out among employees.

At the Hermosillo teleport in Mexico, the site has upgraded its air-conditioning system and replaced the glass roof structure of the main building with thermal insulating panels allowing natural light flow into the building

In addition, the Group Information Systems Division is conducting a streamlining project on Group level concerning its information systems and processes. The main actions taken or pursued since 2016:

- ▶ the implementation of a product catalogue for servers and workstations favouring the low consumption of computer equipment and respect for the environment;
- ▶ the implementation of equipment such as "Blade" for servers, which consumes less energy, with electrical system units;
- ▶ computers go into stand-by mode if not used for 20 minutes;
- ▶ the replacement of workstations now tends to be conducted upon request when the station is no longer functional, and no longer systematically every three years.

Under the project name "One Move IT", the teams took advantage of the move in Eutelsat's head office to change virtualisation technology.

This migration enabled Eutelsat to rationalise its equipment (servers), reducing the number of servers from more than 40 to ten at the Issy-les-Moulineaux site, thereby generating savings at all levels:

- ▶ savings on hardware (servers);
- ▶ savings on energy: this equipment's electricity consumption has been reduced by two-thirds;
- ▶ saving on Datacenter maintenance costs;
- ▶ savings on administration (more modern and responsive, fewer servers to manage, fewer licenses to purchase);
- ▶ savings on subcontracting.

The Group has also migrated all of its remaining physical servers to virtual servers.

As a result, the Group's Corporate Datacenter has no remaining non-virtualised servers.

This critical step was carried out without any service interruption, enabling the rationalisation of the equipment while generating savings.

	Units	2021	2021
Consumption of energy in kWh (Group)	kWh	23,982,934.84	22,925,587
Including on-site renewable energy	kWh	46,767	

The Group's energy consumption nonetheless increased by 1,284,114 kWh. This is mostly explained by increased activity at the Cagliari teleport, with a portion of the Turin teleport's resources having migrated to the Cagliari teleport. Furthermore, some of our activities

formerly outsourced to partner teleports have been brought back in-house at the Cagliari teleport.

Energy consumption at the Company's headquarters also increased following the return of most employees to the office.

### 3.4.3.2.2 Breakdown in Eutelsat's CO<sub>2</sub> emissions

The Group assesses the significant items of greenhouse gas emissions over a broader scope, in compliance with Article 173 of France's Energy Transition Act (*Loi de transition énergétique*) and according to the rules of ADEME's carbon audit.

Significant items of greenhouse gas emissions	2021 emissions of CO <sub>2</sub> equivalent
Diesel (Buildings)	60
Fuel (Vehicles)	74
Refrigerant fluids	370
<b>TOTAL SCOPE 1</b>	<b>504</b>
Consumption of energy	6,128
Consumption of renewable energy (photovoltaic panels)	2
<b>TOTAL SCOPE 2</b>	<b>6,130</b>
Buildings <sup>(1)</sup>	660
Eutelsat satellite fleet <sup>(2)</sup>	75,709
Waste <sup>(3)</sup>	65
Electronic and IT equipment	1,585
Use of FRANSAT products sold <sup>(4)</sup>	117
Employee commuting <sup>(5)</sup>	331
Accommodation and Meals	73
Capacity leased on third-party satellites <sup>(6)</sup>	9,069
Water consumption	1.5
<b>TOTAL SCOPE 3</b>	<b>87,759</b>
<b>TOTAL</b>	<b>94,147</b>

(1) All the buildings at our sites are amortised for their entire life cycle.

(2) All the satellites in our fleet are amortised over their entire life cycle.

(3) All the waste generated.

(4) FRANSAT products are sold only in France.

(5) All rail and air travel by the Group's employees.

(6) The carbon impact of the satellites we lease as a proportion of the capacity we lease on them.

The Group's Scope 1 emissions increased this year following the inclusion of liquid refrigerants in Scope 1 and the fuel consumption of owned vehicles. This data was not collated in previous years. The Scope 1 CO<sub>2</sub> emissions remain very low and mostly come from the use of liquid refrigerants and diesel, which are essential for the maintenance of our operations and for which no substitutes are available.

The increase in the Scope 2 emissions is explained by the energy consumption at our sites. Numerous measures are in place to reduce energy consumption as seen in Section 3.4.3.2.1.

The perimeter of our Scope 3 has been expanded compared with previous years and the accounting method used for fixed assets is now aligned with that of the ADEME carbon audit. Over 90% of our Scope 3 emissions booked come from our fixed assets and, more particularly, from our satellite fleet. A more detailed Scope 3 evaluation is being studied to identify the emissions of our value chain. Eutelsat is now participating in industry working groups to gain a broader vision of the impact of the sector and determine the actions to be put in place.

In addition, a plan to reduce travel and all the long-term impacts owing to the Covid-19 public health crisis have reduced the impact of business travel.

### 3.4.3.2.3 Taking into account the impacts of climate change

Since Eutelsat's activity is mainly located in space, the Company has limited exposure to the impacts of climate change.

### 3.4.3.3 Protection of biodiversity

Eutelsat's activities have little impact on biodiversity. However, several initiatives have been conducted in this field.

Most of the agricultural land owned by Eutelsat at the Paris-Rambouillet teleport site is leased to a farmer who, in 2021, obtained Organic Agriculture certification delivered by the Departmental Directorate of Territories (DDT) and recognised by the French and European authorities.

## 3.4.4 European Green Taxonomy

Pursuant to the European Regulation 2020/852 of 18 June 2020 on the establishment of a framework to facilitate sustainable investment in the European Union, and its appendices, as well as the Commission Delegated Regulation of 6 July 2021, businesses that are required to provide a Non-Financial Performance Statement have an obligation to publish key performance indicators such as the share of their turnover, their capital expenditure (CAPEX) and their operating expenditure (OPEX) from services associated with those economic activities that can be considered sustainable under the Regulation and for this year, under two climate change related objectives: climate change mitigation and climate change adaptation.

The European Commission's approach is evolutionary. It is the industries responsible for the highest greenhouse gas emissions that were the first to be targeted by its regulations. Accordingly, the telecommunications sector's activities are not included in the scope of the European green taxonomy under the Commission's delegated regulation. Therefore, Eutelsat's activities are not eligible for the European green taxonomy regulation.

However, the evaluation of the eligibility of each sector is likely to undergo changes as a result of the Commission's work, and it will be important to keep an eye on future developments.

## 3.5 Social information

### 3.5.1 Employment

#### 3.5.1.1 Workforce

The Group's headcount remained stable: 1,171 employees at 31 December 2021 (versus 1,171 in 2020).

Within the Group, there were more than 148 new hires. This recruitment was in anticipation of forthcoming retirement departures and to support the transformation of the Group.

The Group's subsidiaries in France, Italy, Mexico and the Middle-East account for close to 84% of the workforce.

Eutelsat S.A. prepares an annual social audit report summarising the key data in a single document. This provides a high-level overview of the Company's performance in this area. The social audit report is prepared with reference to the calendar year.

Breakdowns of the workforce by gender, age and geographical area can be found in the social indicator tables in Section 3.8.1.

	Units	2021	2020
<b>TOTAL WORKFORCE</b>	<b>PERSONS</b>	<b>1,171</b>	<b>1,171</b>
Men	persons	776	775
Women	persons	395	396

#### 3.5.1.2 Vocational integration of young adults

Eutelsat is conscious of the need to include young adults in the world of work, particularly within an economic environment which has been negatively impacted by the public health crisis. This is why the Group continued to recruit under its internship and work/study programme in 2021. Eutelsat thus hired more than 30 people on internship contracts during 2021 and 61 people under 25 years of age were recruited on either temporary or permanent employment contracts. 29 students also carried out a work/study assignment within the Company in 2021.

At the end of 2020, the Group launched a recruitment campaign dubbed "Job Booster". This recruitment campaign is to help young graduates find their first jobs in this difficult context. It has enabled the Company to benefit from the hiring of more than thirty young graduates who will participate in Eutelsat's dynamism and transformation.

#### 3.5.1.3 Compensation

Employee compensation comprises a fixed salary, a possible bonus and an LTIP ("Long Term Incentive Plan").

The performance criteria used to calculate bonuses are correlated with the performance of the Group or its departments and have been harmonised across the Group and its subsidiaries.

The LTIP is based on both quantitative financial and CSR criteria, to reflect the growing importance of sustainable development (e.g.: taking into account gender diversity within the Group and the proportion of women within Eutelsat).

### Eutelsat S.A.

A corporate savings plan (PEE) was established within Eutelsat S.A. in July 2000: the plan distributes significant sums on top of compensation as part of an incentive and profit-sharing plan.

Employees who so wish may save up to 5,000 euros per year in the corporate savings plan (PEE). Eutelsat tops this up with an employer contribution of up to 2,170 euros.

## 3.5.2 Quality of life at work

As a state-of-the-art technology company operating in a global market, Eutelsat is committed to creating an international corporate culture, uniting employees around the idea of shared practices and values, attracting and retaining talent and ensuring good working conditions. The role of women in the Company and the reframing of the concept of disability are amongst the priorities of the HR management policy.

The Group is highly culturally diverse, with employees from 47 countries across five continents at end-2021. Four nationalities are represented on the Board of Directors. As of 31 December 2021, 47.22% of the Group's total workforce (i.e. 553 of the total 1,171 employees) was located outside France.

To make it more cohesive and maintain its international identity, the Group is implementing a policy built around the:

- ▶ quality of life at work and employee engagement, measured through a survey in 2021;
- ▶ organisation of in-house seminars and webinars, in France and internationally;
- ▶ mobility of French employees across the Group's international subsidiaries.

### 3.5.2.1 Quality of life at work and employee commitment

At Eutelsat S.A., the action plan to promote gender equality and quality of life at work was published in 2021. It addresses a number of topics with respect to quality of life at work, including work-life balance and the right to log off, echoing the publication in 2017 of a digital tools' usage charter. It is also supported by the elements concerning the right to log off in the supplementary clause to the remote working agreement signed in the summer of 2020.

2020 saw the culmination of the project to relocate Eutelsat's head office. This project was conducted in cooperation with the employees and numerous experts to ensure a healthy working environment and put the accent on quality of life at work. A brain-storming process on numerous dedicated spaces which had not been present in the former premises was thus launched and enabled Eutelsat to modernize its head office. The quality of life at work thus constituted a key element of this thinking on the organisation of the removal. A number of elements in the Issy-les-Moulineaux premises are thus new to employees, like those relating to catering, or linked to the available facilities. Rest areas were created and a great deal of attention was paid to visual and acoustic comfort, and to ergonomic furniture. Lastly, a high-quality collective canteen was put in place adapted to the needs of employees and offering several catering solutions with different and specific ambiances. In 2021, Eutelsat showcased these spaces dedicated to staff.

Additionally, in line with the French Mobility Orientation Act of 24 December 2019, known as the "LOM", a mobility plan was established at the end of 2020. It inventories and outlines the measures taken with respect to employee travel and introduces several new measures aimed at soft mobility: some tangible, innovative examples include recharging stations for electric vehicles in the car park and the creation of bicycle repair workshops. Furthermore, notably following the mobility plan published in 2020, a carpooling working group was set up. This project was pursued within the framework of an action plan drawn up in 2021 through which Eutelsat informed its employees that it wished to initiate an experiment, thanks to the "Tous Covoitureurs" carpooling project in partnership with Klaxit. This consisted of making the free carpooling app available as of the beginning of 2021, with the costs linked to the service for carpooling passengers being covered by a budget ringfenced for the programme, the drivers remaining nonetheless remunerated. This is a full-scale trial to test the potential employee interest in this scheme deployed via a dedicated app.

In France, an agreement had been successfully negotiated in 2018 on working time accounts (*compte épargne temps* or CET) with the first such accounts being created in 2019. These allow employees to personally manage their leave to tailor their time off to their needs. This agreement puts into effect the desire of the social partners to provide employees with effective measures to help improve their quality of life at work.

For the Group, a key area in improving quality of life at work has been the introduction and roll-out of remote working, initially in Mexico and Italy, and subsequently in France. This has been followed by other countries like Russia and our subsidiary in Dubai. Since the establishment of remote working, some regions have even seen their mechanisms broadened or made more flexible in a spirit of trust and a culture of performance.

In France, an agreement was signed in 2019 making it possible to establish a specific system to support employees facing personal emergencies as much as possible: the gifting of time off.

This system reflects the spirit of unity, solidarity and mutual support shown within a working community and is wholly in line with Eutelsat's values and specifically those of respect and team spirit.

To step up the support provided to carers, at the end of 2019 discussions began on how to support family caregivers. These have been initiated and should bear fruit in 2022. Along the same lines, discussions were conducted in Italy in 2020 and 2021 on establishing a similar system and specifically on promoting solidarity and the Group's values. Discussions are underway with the unions and, following this consultation period, the project will be deployed by the end of 2022 within the Italian entities.

As part of an effort to prevent psychosocial risks, an external hotline (Stimulus service) enables Eutelsat S.A. employees to reach out to a hotline manned by certified clinical psychologists.

### The Company's values, a driver of employee engagement

The Ethical Charter published in 2018 underlines the Company's mission and key values as well as its commitments to its clients, partners and employees. The One Eutelsat programme, rolled out since the previous financial year to 200 Group employees across all the subsidiaries, has mobilised all managers, including the members of Executive Committee. A driver of employee engagement, this programme has made it possible to unite those employees around the Group's shared values and strengthened their management skills by emphasising professional behaviour, emotional intelligence, managerial kindness and human capital. Training workshops are held to communicate and share these values with all Group employees.

The Group is pursuing the ONE Talk initiative aimed at communicating the Group's strategy and actions undertaken by the Group's key divisions to all employees. External contributions are also invited to some sessions to share their insights on the strategic business themes. During the last financial year, thirteen sessions were held bringing together several hundred employees at each event.

In addition, to inform and establish a regular dialogue with employees, webinars hosted by the Group's Chief Executive Officer are organised on a monthly basis.

The engagement of employees and their satisfaction at work is regularly measured. A Bloom At Work survey was launched on 18 June 2021, supplemented on 21 July 2021 by the Denison survey relating to the business culture which recorded a participation rate of 67%.

### 3.5.2.2 Talent identification, development, and retention

In early 2020, a new "Talent Review" process was rolled out following on directly from the Rising Star programme for high-potential executives conducted over two financial years.

This process is supported by the Group's Human Resources Information System, covers all countries and teams, and instils a "bottom-up" approach that enables interaction by team/department, and then at Group Executive Committee level.

This process aims to:

- ▶ identify, develop, and retain a talent pool (high potentials and "key experts");
- ▶ feed into the Group's succession plans;
- ▶ facilitate SWOT analyses of organisations and draw up resulting action plans to manage skills (training, recruitment, partnership) and optimise organisations and business processes.

The talented individuals identified during this process have benefited from a Mentoring programme, support for their development plans and from their line managers but also the Executive Committee, all of whom take a particular interest in their career development.

Other actions benefiting all employees have been further developed over the years, such as a long-term employee loyalty plan for around 30 Group employees.

Furthermore, Eutelsat has expanded its social media presence to build and enhance other ties with employees and more broadly with people who are interested in its business.

### 3.5.2.3 Work organisation

#### 3.5.2.3.1 Collaborative innovation

Eutelsat is working towards digital transformation, which helps to bring together the Company's cultures, processes and tools under the One Eutelsat programme.

Eutelsat Insider, the Group's intranet portal, saw a 15% increase in the number of visits this year, with 750 people per day versus 500 in 2020, and is establishing itself as a key information and collaborative tool for employees. Via a single entry point, this portal gives employees access to business tools which are now standardised, along with useful practical information and documents. The change in digital uses this year saw the ergonomics further developed as well as some of the functionalities of this tool to respond more effectively to user needs, more space now being given to editorial content addressing employees' daily lives. The Group's intranet portal, launched in 2019, benefited from modernisation during 2021, enabling the visibility of the new premises to be reinforced but also giving pride of place to new recruits and also promotions and internal mobility.

Within the framework of the different lockdowns, collaboration and awareness-raising initiatives were realised (e.g. webinars on the digital tools). Seminars on hybrid working were organised for managers.

The One Lab space was also launched in 2021, enabling the organisation of collaborative and creative work sessions to promote innovation. This space also permits the organisation of exchanges with key innovation players.

#### 3.5.2.3.2 Working time arrangements

Eutelsat complies with the International Labour Organisation (ILO) rules on working time arrangements. Moreover, the Group's management ensures that all subsidiaries, both in France and abroad, comply with local labour laws, including those relating to working time.

At Group level, the statutory 40-hour week applies to 98.5% of the Group's employees. In France, where 52.78% of the Group's employees are based, the management applies the statutory 35-hour week for non-managerial staff who represent 10.47% of the workforce. The vast majority (89.53%) of employees hold management positions and benefit from an average package of 212 working days per year, allowing for more flexibility in the way they organise their schedules. Employees benefit from six weeks of paid leave. Managers also enjoy 13 days of RTT (Reduction of Working Time).

Several working time agreements have been signed with employee representatives, including the Working Time Account agreement of 2018 and the remote working agreement, signed in 2018 and which was the subject of a supplementary clause in 2020.

The subsidiaries have a policy of paid leave that complies with the labour laws and regulations in the countries in which Eutelsat operates. Some offer additional leave provisions and benefits.



Well beyond the technical aspects, remote working (see Section 3.5.3.2) is an integral part of the corporate plan to foster a culture of performance and accountability amongst team members. Employees are able to contribute to new ways of sharing work between the office and home. It was with these principles in mind that a supplementary clause to the remote working agreement was

signed with the social partners in France in July 2020, to adapt to the current issues concerning work organisation. Furthermore, this remote working agreement has borne fruit by facilitating, at the end of various lockdowns during 2021 linked to the public health crisis, a progressive return to the office for all employees.

### 3.5.3 Labour relations

The Group's management strives to maintain a productive social dialogue for the well-being of its employees worldwide and above all to ensure ongoing compliance with local practices in the countries in which it operates. The Group's HR Department looks to harmonise practices and schemes across countries with a view to strengthening the "One Team" spirit, a value reaffirmed within the Group.

#### 3.5.3.1 Organisation of the social dialogue

For Eutelsat, social dialogue and maintaining a positive social climate are very important, as demonstrated by the ongoing dialogue between the social partners.

At its main subsidiary Eutelsat S.A., the Group fully respects freedom of association and promotes social dialogue through collective bargaining. Following the rulings in September 2017, Eutelsat's social partners agreed to extend the existing mandates for another year. A works committee (French CSE) was set up following the election of employee representatives in November 2018. In 2019 and 2020, the Company showed its ability to develop social dialogue with these new bodies and to implement their new role, which was notably the subject of an agreement in 2018.

Eutelsat S.A. has implemented an agreement on trade union rights governing, in particular, relations between the social partners. During 2021, meetings with the union representatives were aimed at revisiting and modernising this agreement. The Company Intranet, where company-level agreements are accessible, is also a communications tool on these matters. In addition, meetings are organised around the annual and half-year results to recap on the highlights for the period and present the results to Group employees.

In addition and by way of example, during 2021, an "HR Portal" was rolled out to centralise and inject a new dynamism into all the useful information for employees (articles, job mobility opportunities, new recruits, fact sheets). The teams responsible for the project were aware of the comments made by the elected representatives and organised a workshop to work together on improving this communication tool.

Eutelsat S.A. was also invited by the elected representatives to join forces on the implementation of a platform on which to post press articles and give access to various training modules: "Tout Apprendre". The Company contributed to this initiative and participated financially in its deployment alongside the elected representatives.

A co-construction initiative has been established with all stakeholders, notably via joint working groups on key issues. The measures linked to the return to the office within the framework of the Covid-19 pandemic were thus co-constructed with the employee representatives, the players demonstrating a real maturity in social dialogue and health/safety matters.

Beyond being a channel for communications and dialogue, the Intranet portal available to the whole Group represents a means of changing working practices against the background of the digitalisation of the Company. Lastly, access to MyHRPlanet for all employees dating back many years enables the Group to count on a reliable tool which is familiar to employees. It improves the transparency of most of the HR processes, like the inputting of targets, performance and the granting of bonuses. It also offers every employee the opportunity to express their needs in terms of training or their wish for internal transfers. Available from the Group's intranet portal, this is a powerful tool in support of integration and social dialogue, while enabling employees to monitor and manage their careers.

#### 3.5.3.2 Collective agreements

This section mainly concerns Eutelsat S.A., whose collective agreements are published on the Company's Intranet.

Eutelsat S.A.'s social partners emphasise corporate social responsibility:

- ▶ "Mid-career" interviews are held annually with employees who wish to conduct an audit of their experience and skills, and support their mobility aspirations.
- ▶ In 2018, two agreements on (i) working time accounts (CET) and (ii) remote working were signed and have been rolled out within Eutelsat S.A. since 2019. Similar remote working arrangements have also been implemented in various subsidiaries, e.g. in Italy.
- ▶ In 2019, the social partners signed an agreement governing the gifting of time off between employees, defining the arrangements and rules of application both for Eutelsat and for the employees who are giving and receiving. This agreement reflects the spirit of unity and solidarity in support of employees facing family emergencies.

Regarding professional gender equality, a review of the recommended measures is conducted annually and presented to the employee representatives.

### 3.5.4 Health, safety, and well-being in the workplace

With the exception of the teleports, the Group's activities are carried out in office buildings. As a result, most employees are not exposed to any specific health and safety risks.

#### 3.5.4.1 Health and safety conditions

In France, the Comprehensive Risk Assessment Document (DUERP) lists the risks and is updated annually by the safety department at the Issy-les-Moulineaux sites and the Paris-Rambouillet teleport. This Document has a specific procedure for dealing with work-related stress risks and is available on the Company's Intranet. Not only was it updated three times during 2020 in response to the Covid-19 pandemic, this Document was also comprehensively revised for the Issy-les-Moulineaux site in early 2021 following the move. This pandemic was also an opportunity to express the "One Team" value through the help provided, in 2020, to Group companies located in areas in which the virus was spreading (shipping masks, hand gel, etc.).

The Comprehensive Risk Assessment document is an integral part of this risk-prevention policy. Eutelsat has registered no priority 1 risks and works in close cooperation with the employee representatives to mitigate the criticality of the priority 2 and 3 risks.

Details of the actions carried out in the various areas associated with employee health and safety can be found below.

#### Health

Eutelsat S.A. (France) has established a guaranteed health and retirement programme for all its employees, particularly through health and life insurance schemes in addition to supplementary retirement benefits. Eutelsat S.A. offers employees over 50 years old a complementary full medical check-up every three years. A medical centre specialising in prevention carries out health checks intended to avoid serious ailments caused by occupational illnesses by means of high-end medical services. It also offers lifestyle advice designed to minimise the negative impacts associated with factors such as inappropriate diet, sleep problems and stress. A special programme is in place for controllers.

#### Travel

There is a special process for foreign travel, with graded levels of approval depending on the country risk assessment, and membership of a foreign support team. Employees receive general training on travel risks with additional training as required for specific country risks.

#### 3.5.4.2 Electromagnetic waves

The subject of exposure to electromagnetic waves is also part of the environmental risks. The World Health Organisation (WHO) has commented on this issue as follows:

*"WHO, through the International EMF Project, has established a programme to monitor the EMF scientific literature, to evaluate the health effects from exposure to EMF in the range from 0 to 300 GHz, to provide advice about possible EMF hazards and to identify suitable mitigation measures. Following extensive international reviews, the*

*International EMF Project has promoted research to fill gaps in knowledge. In response national governments and research institutes have funded over 250 million U.S. dollars on EMF research over the past ten years.*

*While no health effects are expected from exposure to RF fields from base stations and wireless networks, research is still being promoted by WHO to determine whether there are any health consequences from the higher RF exposures from mobile phones<sup>(1)</sup>."*

To protect Eutelsat teleport employees in France from potential undesirable exposure to electromagnetic waves, the Company takes the various precautions listed below:

#### Tests and access to facilities

- ▶ Periodic tests measuring radiation and its impact are carried out at the Paris-Rambouillet teleport. The most recent tests were completed in 2019.
- ▶ All antennas at the Paris-Rambouillet teleport are tested in accordance with ESVA (Earth Station Verification and Assistance) to ensure the quality of the facility and detect any incidences of radiation exceeding the acceptable norms. As a standard part of every ESVA activity, antenna radiation patterns are measured. This allows for corrective actions to be taken in response to any installation shortcomings (such as excess surface mechanical tolerance, etc.). A radiation pattern is used to determine the maximum permissible EIRP (Equivalent Isotropic Radiated Power) spectral density, which may not be exceeded by any transmission originating from the station being tested. Eutelsat establishes standards to ensure compliance with national and international (i.e. ITU) radio frequency regulations.
- ▶ Access to potential high-risk exposure installations (limited number of antennas close to the ground) is strictly controlled by fences or marked with signage on the ground.

#### Awareness-raising and training

- ▶ All employees working on antennas are informed of the potential exposure risks.
- ▶ Training of new recruits at several sites;
- ▶ Training of Local Safety Teams at several sites;
- ▶ Fire drills at several sites.

The other teleports in Italy, Mexico and Portugal have implemented similar procedures.

#### 3.5.4.3 Employee representation on health and safety matters

In France, the employee representative body responsible for health, safety and working conditions is the SSCT Committee, an integral part of the CSE. It is the Company's main point of contact for such matters. The SSCT Committee meets various times during the year and at least once a quarter. Its powers and role are set out in the agreement on the transformation of social dialogue – Agreement on the functioning of the Social and Economic Committee, signed in 2018.

(1) [https://www.who.int/topics/electromagnetic\\_fields/fr/](https://www.who.int/topics/electromagnetic_fields/fr/) - [https://www.who.int/health-topics/electromagnetic-fields#tab=tab\\_1](https://www.who.int/health-topics/electromagnetic-fields#tab=tab_1).

In Italy, in-house union representatives, known as RLS (“*rappresentante dei lavoratori per la sicurezza*”) are responsible for issues relating to employee safety. An employee is also responsible for the safety of installations and for the mandatory health and safety training of all employees. This employee is called the “*Preposto alla sicurezza*”. Lastly, the HR team arranges regular medical check-ups for employees.

Within the Group, 83.77% of the staff are employees of entities benefiting from an employee representative body. This is the case in France, Italy, Mexico, Russia and Jordan.

### 3.5.4.4 Accidents at work and occupational illnesses

In 2021, 6 occupational accidents were recorded throughout the Group, all of which in France, representing a total of 126 days of absence following three of these accidents.

One occupational illness was recorded in the Middle-East region.

	Units	2021
Frequency rate	Number	1.43
Gravity rate	Number	0.06
Absenteeism rate <sup>(1)</sup>	%	1.87

(1) 98.3% of the Group's consolidated scope.

## 3.5.5 Training and career management

### 3.5.5.1 Skills enhancement

To remain competitive, the Group offers employees training programmes that allow them to become more effective in their daily work, or to build new skills that will enable them to remain abreast of developments in the Group's businesses. To this end, despite the situation of public health crisis, Eutelsat S.A. heavily invested in employee training in 2021<sup>(1)</sup> with a wide range of disciplines and themes covered, reflecting the challenges facing the Group.

Training sessions focused on:

- ▶ regulatory and technical aspects of satellite communications or data processing systems;
- ▶ management (hybrid working mode);
- ▶ safety (Crew Evacuation, Workplace First Aid Representative), project management (ITIL);
- ▶ living languages, particularly English and French for non-native speakers;
- ▶ support functions: human resources, finance, law;
- ▶ IT tools.

All new hires were also given training in anti-corruption and compliance. Furthermore, special personal data protection and cybersecurity training modules were made available (see Section 3.2).

The Group is reinforcing digital initiatives with the launch of a trial in 2021 with the ELearning Docebo platform for Operational staff. In 2022, this successful trial will lead to a wider roll-out of the tool to all employees with, notably, access to training modules selected for their relevance including on-line courses, MOOC modules, e-learning, blended learning, etc. This will enable training for all employees and more effective monitoring of the training plans for individual employees.

Thus, in 2021, more than 38.96%<sup>(2)</sup> of the Group's employees received training.

Number of hours of training	Units	2021
Group total	Hours	6,716
Eutelsat S.A. <sup>(1)</sup>	Hours	4,777

(1) The total number of hours of training does not include the hours of cybersecurity and anti-corruption training for Eutelsat S.A. as these are booked separately. More than 900 hours of cybersecurity training have been carried out.

Number of hours of training per employee trained	Units	2021
Group total	Hours	14.76
Eutelsat S.A. <sup>(1)</sup>	Hours	17.83

(1) The number of hours of training per employee does not include the hours of cybersecurity and anti-corruption training for Eutelsat S.A. as these are booked separately. 369 employees have been trained in cybersecurity.

### 3.5.5.2 Careers and mobility

In France and in every country where Eutelsat operates, annual performance interviews are conducted by managers with the support of the HR computer system. A professional development interview has also been established which must take place on an annual basis and may be conducted in parallel with the annual performance review. These interviews are designed to support employees in their desire for mobility and skills development.

In France, Eutelsat S.A. has implemented a “Career Review” interview which takes place after six years of service with the Company. A jobs board has been created with the support of the HR computer system, allowing for all vacancies to be posted immediately on the Intranet. Any internal candidate who applies is interviewed. Internal job opportunities are also specifically featured on the updated Intranet with a view to reinforcing their visibility across the Group.

(1) Share of the payroll allocated to training at Eutelsat S.A.: 2%.

(2) The percentage does not include cybersecurity and anti-corruption training at the level of Eutelsat S.A.

## 3.5.6 Diversity and equal opportunities

### 3.5.6.1 Gender equality

The representation of women within the business and gender equality are priorities for the Company, and the Executive Committee has tackled these issues to make progress in this area. The percentage of women in the Group is 33.2%. The 2023 targets are 1% more women in the Group compared with the 2020 baseline, and 5% more women in the Group's top management (top 100); this is one of the criteria for the long-term variable compensation agreed in November 2019. The plan supports measures pertaining to paternity leave, which have been rolled out across a number of countries (Italy, Singapore, Dubai, Mexico), actions to raise awareness of and combat cognitive biases for employees and managers, along with educational efforts carried out in partnership with NGOs (CGénial Foundation, Junior Achievement).

Eutelsat S.A. scored 89/100 in the professional equality index<sup>(1)</sup>. This score recognises the gender equality policy deployed in recent years.

In France, a new action plan to promote gender equality and quality of life at work was established at the end of 2021 to be rolled out in 2022. It follows on from the previous action plan dating back to 2020 and covers access to employment, promotion, effective compensation and work-life balance. Targets and indicators have been set for each of these priorities. The Gender Equality Committee meets at least once a year to monitor this action plan.

A special budget is set aside for salary adjustment schemes. The taking of paternity leave is also encouraged. Since 2009, Eutelsat S.A. has been topping up the daily indemnities paid to fathers by the social security system, in order to maintain compensation levels. Since July 2021, Eutelsat has implemented the new paternity leave modalities foreseen by the French government, while bearing in mind its actions deployed internationally.

Data on employment, training and compensation by gender can be found in the social indicator table at the end of this Document.

In Italy, Eutelsat has been a member of the Valore D association since 2019. This association of 200 companies promotes diversity and an inclusive culture in companies and organisations. Belonging to the Valore D network enables companies to position themselves as a powerful and influential voice on diversity and inclusion, and gives access to a network composed of international companies which are already committed to diversity and inclusion, thereby facilitating successful collaboration. This has notably been exemplified through the various inter-company mentoring projects offered since 2019 and in which Eutelsat has participated. To pay tribute to the very good results obtained by the Company, Eutelsat was invited to take part in a special mentoring programme in partnership with the company Sanofi.

Within the Group, a paternity leave scheme has also been put in place designed to give new fathers time to help out around the home. In a number of countries, the Group offers new fathers additional days

of leave on top of the statutory provision. In Italy, for example, the Company grants an additional five days, bringing total paternity leave to 12 days. In Mexico, paternity leave has now been doubled to 10 days.

### 3.5.6.2 Employment and integration of people with disabilities

The Group employs 17 people with disabilities (compared with 16 in 2020), four of whom at Eutelsat S.A.

Eutelsat also seeks to find other jobs within the Company for employees who are deemed unfit for their existing positions. The Company also works with recruitment agencies that are aware of disability issues on the vocational integration of people with disabilities.

Eutelsat S.A. contributes a portion of the apprenticeship tax collected to institutions that focus on promoting education for people in need of a second chance or on integrating people with disabilities.

The initiatives on disability have mostly focused on a study of the action to be taken notably to raise employee awareness of the different forms of disability. It is with this in mind that, in consultation with the employee representative body responsible for health, safety and working conditions (SSCT Committee), a Disability Correspondent was appointed at the end of 2021. During 2022, the Disability Correspondent will benefit from targeted training to enable them to assume their full role. This training is notably aimed at clearly identifying the different challenges and key players so as to support employees with disabilities more effectively and further raise the awareness of all employees. Communication, awareness-raising and the involvement of all the stakeholders will thus be addressed as an integral part of this training.

Thanks to these commitments, the actions studied in 2021 will bear fruit during 2022. Eutelsat S.A., ringfences a portion of its funds collected in respect of the apprenticeship tax to organisations whose core business is promoting training for persons requiring a second chance and enabling vocational access to persons with disabilities.

### 3.5.6.3 Combating discrimination and encouraging diversity

The international and multicultural context together with compliance with local regulations have led Eutelsat to emphasise skills and diversity, eliminating all forms of discrimination from its HR management processes. Particular attention is paid to these points during the recruitment process.

Diversity and, in particular, multiculturalism are key factors in Eutelsat's success.

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(1) Results of the professional gender equality index relating to 2021, published on 1 March 2022.

### 3.5.7 Respect for the fundamental conventions of the International Labour Organization (ILO)

All Eutelsat subsidiaries comply with the ILO's conventions and principles in countries where these fundamental conventions apply.

#### 3.5.7.1 Respect for freedom of association and the right to collective bargaining

All Eutelsat subsidiaries have stated that they are in compliance with all regulations regarding the right to collective bargaining in the countries in which they operate.

The Group observes strict political, religious, and philosophical neutrality. The Group makes no financial contributions to political candidates, elected political representatives or political parties. Employees are allowed to participate in political activities in their own right, outside company premises and without using the Group's corporate image to support their personal beliefs. These principles are applied with due regard for the individual freedom of expression of employees and their representatives.

#### 3.5.7.2 Fight against labour discrimination

The Group respects the principles outlined in the ILO conventions.

#### 3.5.7.3 Elimination of forced labour

All Group subsidiaries comply with the principles outlined by the ILO.

#### 3.5.7.4 Prohibition of child labour

All Group subsidiaries comply with the principles outlined by the ILO.

## 3.6 Outsourcing and relationships with suppliers

Given the highly technical nature of Eutelsat's business, the Group works with a limited number of major suppliers or subcontractors to manufacture and launch its satellites. In addition to procuring satellites in accordance with French space law, these main suppliers, who are mainly located in Europe and the United States, are required to meet high standards of social responsibility.

As for the procurement policy for products and services, the Purchasing Department at the Group's headquarters ensures that its key suppliers have implemented a policy that addresses the social and environmental issues: to reach this goal, a supplier charter is in force which our suppliers must respect. All suppliers must adhere to this charter to be eligible for inclusion in Eutelsat's approved list of suppliers.

Supplier control principles and procedures are applicable to the entire Eutelsat Group, as are environmental and social clauses, which are however adapted to local regulations.

All employees who deal with our suppliers are specifically educated and trained on risk issues.

All buyers under permanent contracts have completed an awareness-raising session on responsible procurement and must account for their purchasing practices in their annual performance objectives based on CSR criteria.

Calls for tender include a commitment to respect the ethical charter. Procurement contracts always contain clauses requiring compliance with regulations, including a ban on the employment of non-registered staff and the fight against corruption. For suppliers of product, the product description sheet is usually attached or provided on request.

Furthermore, in compliance with the Sapin II Act, stricter controls have been instituted.

All suppliers must undergo preliminary checks before being included in the supplier databases:

- ▶ Suppliers are established on a centralised basis by the Group's Purchasing Department.

- ▶ Verification of suppliers is carried out before their registration, on the basis of a dedicated questionnaire and the "World-Check" process.
- ▶ The evaluation and classification of supplier risk is carried out according to a set of criteria (supplier's activity, country in which the company is registered for trading, etc.) defined jointly with the Legal Affairs Department based on the recommendations of the French Anti-Corruption Agency's (*Agence française anticorruption* – AFA).
- ▶ High-risk suppliers are reviewed and cleared by the Compliance Committee, or even by the Executive Committee in the event of a particularly high risk.
- ▶ High-risk suppliers are subject to reinforced monitoring.

For existing suppliers:

- ▶ All suppliers with whom Eutelsat already has a relationship are subject to a full assessment when Eutelsat is considering entering into a new contract or renewing an existing contract with them, or when a significant change concerning the supplier is identified.
- ▶ In the case of high or particularly high risk, existing suppliers must be audited every two years. For a low or moderate level of risk, these checks take place every three years.

Furthermore, for business introducers/agents, a validation process is in place, starting with the submission of a written requirement validated by the Chief Commercial Officer, followed by the completion of an internal and external questionnaire for the agent, prior to the due diligence procedure entrusted to a specialist service provider.

After receiving the service provider's opinion, the Eutelsat Compliance Committee determines whether to authorise or refuse the contract with the business introducer.

For business introducers who are renewed, a lighter due diligence is requested every two years.

As with business introducers, lobbyists are also subject to a separate due diligence procedure with the assistance of a specialised service provider and on the basis of a decision by Eutelsat's Compliance Committee.

## 3.7 Human rights actions

### 3.7.1 Human rights

Eutelsat is committed to respecting human rights in the countries where the Group operates, in particular the Universal Declaration of Human Rights, the International Labour Organisation's fundamental conventions and the United Nations Guiding Principles for Business and Human Rights.

Since 2019, Eutelsat has abided by the ten principles of the United Nations Global Compact.

As part of its General Terms and Conditions of Sale, Eutelsat has incorporated a provision requiring each party to the contract to ensure that they comply with applicable laws and regulations on child labour and fundamental human rights.

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### 3.7.2 Media freedom

In view of its strategic position in the radio and broadcasting market, and although it acts as a simple technical intermediary (Eutelsat makes its satellite capacity available to its customers), the Company is regularly confronted with complex situations in which the fundamental principles of freedom of information, independence and media pluralism are often contravened by attempts, often on the part of foreign States, to impose forms of information regulation informed by values that are different from those prevailing in Europe.

Even within the European Union, the rules applying to the media are currently very different between Member States. In the specific case of satellite broadcasters like Eutelsat, if two EU countries do not agree on the broadcasting of a television channel, it is technically impossible for the operator to cover only one of the two countries. Satellite beams are not wedded to national borders and generally extend across very wide areas. For satellites dedicated to the broadcasting of television channels like Eutelsat's HOTBIRD, the cover is European or nothing. This situation thus further reinforces the need for a single, consistent response at European level.

This is why, in March 2022, Eutelsat submitted to the European Commission, a substantial contribution in response to a public consultation on the topic "Preserving media freedom and pluralism in the internal market" with a view to the adoption of a future European Media Freedom Act. Eutelsat is very much in favour of increased convergence for the decisions taken by Member States, i.e. recourse to a legislative instrument supported by a reinforced network of independent media regulators at EU level with the establishment of common principles applicable within the national procedures. Using the current European network of independent media regulators (ERGA), potentially strengthened by the granting of additional powers and resources, would also be a move in the right direction.

The complete text of Eutelsat's contribution can be consulted at the following address: [https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13206-Safeguarding-media-freedom-in-the-EU-new-rules/F2946573\\_en](https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13206-Safeguarding-media-freedom-in-the-EU-new-rules/F2946573_en)

### 3.7.3 Combatting intentional interference

Jamming is defined as interference on Eutelsat's satellite networks which is clearly deliberate and is aimed at disrupting or even preventing the broadcasting of certain TV channels. By definition, deliberate interference is a violation of freedom of information.

Eutelsat constantly monitors incidents of intentional interference, identifying their origins (if possible) and the channels affected. The Group is a member of the Satellite Interference Group (SIG), whose mission is to maintain interference at its lowest level. In this context, Eutelsat uses the "Carrier ID" (CID) system, an embedded code containing information, which allows satellite operators to quickly and easily identify the source of the transmission causing interference. In conjunction with representatives of this organisation and of the GVF, Eutelsat is examining the measures to be adopted against deliberate interference, which must be based on a better geolocation of the signal's origin and on the creation of a repository containing all relevant data on this subject.

Intentional interference is also considered illegal under Article 45 of the Constitution of the International Telecommunications Union (ITU) and Article 15 of the Radio Regulations. This is why the ANFR systematically files complaints with the ITU authorities against countries in which the jamming operations originate. In 2021, on several occasions, Eutelsat again had to ask the ANFR to file such complaints.

Furthermore, Eutelsat follows up on issues regarding the protection of intellectual property rights, in particular the broadcasting of content by "pirate" channels. Since March 2014, the Group has been a member of an Anti-Piracy Coalition that brings together key players in the industry (satellite operators, content providers, distributors, advertisers, etc.) in North Africa and the Middle-East (<http://menaapc.org/index.html>), to monitor satellite TV piracy, take all possible measures to stop piracy (systematic notification of breaches to the distributors involved), ensure the sharing of all data and information relating to pirate channels and raise awareness of the consequences of piracy.

### 3.8 Indicators

The indicators are structured as specified in the French Commercial Code with regard to extra-financial reporting. Correspondence with the data item listed by the GRI standard is indicated when available, as well as a list of the GRI data items published in the Extra-Financial Performance Statement. Some of the indicators in the social section have a broader scope than last year thus comparison between the 2020 and 2021 data is not meaningful. Indicators have been added

in the social and environmental information, and in the ethics and corruption section. The Group's scope 3 for greenhouse gas emissions has been expanded relative to 2020.

NB: other elements of information in the GRI standard (particularly on governance and the risks) are published in this document but are not listed here.

#### 3.8.1 Social Information

Social information (calendar year unless otherwise stated)		2021 Value	2020 Value	Unit	GRI ref.	Scope
Total headcount		1,171	1,171	persons	102-7	
Workforce by gender	Male	776	775	persons	102-8	
	Female	395	396	persons	102-8	Group
Workforce by age <sup>(1)</sup>	Under 25 years	5.3%	4%	persons	401-1	
	Between 25 and 40	41.5%	39.8%	persons	401-1	
	Between 40 and 60	50%	51.2%	persons	401-1	
	Over 60 years	3.2%	3.4%	persons	401-1	Group
Workforce by geographical area	France	618	578	persons	102-8	France
	Italy	196	135	persons	102-8	Italy
	Mexico	127	133	persons	102-8	Mexico
	Middle East	36	47	persons	102-8	Middle East
	Others	194	103	persons	102-8	Others
Recruitment and departures on permanent contracts <sup>(2)</sup>	Recruitment	148	113	persons	401-1	
	Departures	163	131	persons	401-1	Group
Turnover rate		14.01		number	401-1	Group
Number of occupational accidents		6	13	number of accidents	403-2	Group
Number of occupational accidents with days of absence		3	3	number of accidents	403-2	Group
Number of days of absence caused by accidents at work		126	39	number of days	403-2	Group
Frequency rate <sup>(3)</sup>		1.43		number	403-2	Group
Gravity rate <sup>(4)</sup>		0.06		number	403-2	Group
Absenteeism rate <sup>(5)</sup>		1.87	4.12	percentage	403-2	Group
Occupational diseases		1	1	number of diseases	403-2	Group
Hours of training <sup>(6)</sup>		6,716	1,431	number of hours	404-1	Group
Percentage of employees trained <sup>(7)</sup>		38.86	100	percentage	404-1	Group
Number of hours of training per employee trained		14.76				Group
Equality men/women		<b>Men in 2021</b>	<b>Women in 2021</b>			
	Managerial functions	200	84	persons		
	Non-managerial functions	576	311	persons		Group
	Average salary (in euros)	82,882	66,813	euros		Eutelsat S.A
		254,696	137,066	Mexican pesos		Satelites Mexicanos S.A.A de C.V
		51,500	48,000	euros		Skylogic Italy

(1) Breakdown by age of the employees of Eutelsat America Corp. not available. The percentages indicated have been established based on the ages communicated on the total employees whose ages have been indicated (1,152 employees).

(2) Some of the departures correspond to employee transfers between subsidiaries.

(3) Data between 2020 and 2021 are not comparable due to the change in scope.

(4) Data between 2020 and 2021 are not comparable due to the change in scope.

(5) Data between 2020 and 2021 are not comparable due to the change in scope.

(6) Data between 2020 and 2021 are not comparable due to the change in scope.

(7) Incorrect figure for 2020 which represented all the employees having already received anti-corruption training and not the number of employees trained over the course of the year.

### 3.8.2 Environmental information

Environmental information (calendar year unless otherwise stated)	2021 Value	2020 Value	Unit	GRI ref.	Scope
Liquid refrigerants	0.2		tonnes	306-2	Group
Paper waste <sup>(1)</sup>	1.24		tonnes	301-1	Group
Cardboard waste	2.31		tonnes	306-2	Group
WEEE	3.84		tonnes	306-2	Group
Ordinary Waste	63.78		tonnes	306-2	Group
Metals waste	1.65		tonnes	306-2	Group
Water consumption	11,623	15,737	m <sup>3</sup>	303-1	Head office + sites with teleport
Electricity consumption	2,405,657	2,178,878	kWh	302-1	Eutelsat S.A. head office
	9,813,421	9,606,820	kWh	302-1	Paris-Rambouillet Teleport
	3,585,731	3,611,616	kWh	302-1	Eutelsat Americas
	7,066,334	6,501,033	kWh	302-1	Skylogic (Italy)
	1,158,558	1,027,240	kWh	302-1	Caniçal Teleport
Consumption of renewable energies	46,767		kWh	302-1	Group
Diesel consumption	26,326	31,840	litres	302-1	Group
Petrol consumption	21,759		litres	302-1	Group
Floor area of buildings	30,458		m <sup>2</sup>		Group
Greenhouse gas emissions <sup>(2)</sup>	6,632	5,684	tCO <sub>2</sub> eq.	305-1,2,3	Group (scopes 1+2)
Greenhouse gas emissions excluding satellite missions	9,369	10,495	tCO <sub>2</sub> eq.	305-1,2,3	Group (scopes 1+2+3 excluding satellites)
Greenhouse gas emissions including satellite missions	94,147	122,496	tCO <sub>2</sub> eq.	305-1,2,3	Group (scopes 1+2+3 including satellites)

(1) Paper and cardboard waste were regrouped under a single indicator last year. For the purposes of precision, we have shown them separately for this financial year.

(2) The scope 1 measurement was partially realised for the previous financial year.

### 3.8.3 Societal information

Societal and ethical information (calendar year unless otherwise stated)	2021 Value	2020 Value	Units	GRI ref.	Scope
Meetings of the Group Compliance Committee	6	5	number	205.1	
Number of alerts	2	3	number	205.1	
Number of internal investigations	2	2	number	205.1	
Number of employees trained in anti-corruption <sup>(1)</sup>	1,171	1,047	persons	205.1	
% of employees trained in anti-corruption	100%		percentage	205.1	Group
World-check verifications <sup>(2)</sup>	2,137	1,519	number	205.1	
Number of employees trained in cybersecurity	360		persons	205.1	
Number of employees trained in personal data protection <sup>(3)</sup>		19	persons	205.1	
Number of entities/sites with an active DPO <sup>(4)</sup>	3	6	number	205.1	

(1) This figure represents the Eutelsat employees having received anti-corruption training since their arrival.

(2) Comparison with the previous year's figures is not meaningful as the methods used to identify the third parties assessed changed during the financial year.

(3) The information on this indicator is presented in Section 3.2 "Integrity and ethics".

(4) In correct figure for the previous financial year which represented the number of entities covered by the DPO and not the number of entities with a DPO.



## 3.9 Note on the methodology

Since 2010 the Group has published an annual report on Corporate Social Responsibility and, since the 2017-18 Financial Year, a non-financial performance statement.

In accordance with Article L. 225-102-1 of the French Commercial Code and Decree No. 2017-1265 of 9 August 2017 implementing

Order No. 2017-1180 of 19 July 2017 on the disclosure of non-financial information by certain large companies and groups of companies, the Group has collected a response for the items that are relevant to its business.

### 3.9.1 Methodology

Eutelsat's 2021 Non-Financial Performance Statement covers, for the qualitative information, the financial year from 1 July 2021 to 30 June 2022 and, for the quantitative information, the period from 1 January to 31 December 2021, to align this information with the data in the social audit report.

The entire report has been drawn up on the basis of indicators derived from benchmark international standards such as the AA1000 APS (2008), the Global Reporting Initiative (GRI), ISO 26000 and the United Nations Global Compact.

This year saw Eutelsat use the CSR reporting software produced by Tennaxia to ensure the accuracy and consistency of its non-financial performance data and facilitate the steering of its CSR policy. All the contributors have been trained in the use of the software.

Each Group subsidiary has provided some information for the drafting of this report. The section on "social aspects" has been consolidated by the Human Resources Department in the Group's largest subsidiary, Eutelsat S.A., located at the Group's head office in Paris,

France. The information regarding "environmental impacts" primarily reflects input from Eutelsat's suppliers (satellite manufacturers and launch companies). We have also included certain information from the Group's Italian and Mexican subsidiaries and teleports located in Paris-Rambouillet (France), Turin (Italy), Cagliari (Italy), Caniçal (Portugal) and Mexico. Actions against food waste have not been addressed following the Covid-19 health crisis and the transfer of the head office to Issy-les-Moulineaux in October 2021. The "societal" information was gathered mainly through the operating company, Eutelsat S.A., but reflects the picture of the Group as a whole.

With reference to Article L. 225-102-1 of the French Commercial Code, the following topics have been excluded as they are not material to Eutelsat's business:

- ▶ the fight against food waste and food deprivation;
- ▶ a commitment to animal welfare and to responsible, fair and sustainable food.

### 3.9.2 Scope

This work has been coordinated by the Corporate Communications Department and involves the Group's main departments and subsidiaries: Human Resources, Investor Relations, Institutional Affairs, Legal Affairs, Technical Department, General Services, Finance, Audit and Internal Control, Risk Management and Teleports.

As the Group's main operating subsidiary, Eutelsat S.A. employs the majority of its workforce (52.7%). Information from this subsidiary

is used as an "internal reference" for the Group. For the other subsidiaries included in the scope of consolidation, please refer to Section 5.1 "Simplified Group Organisation Chart" of this Document. Where the information being reported is provided exclusively by a specific subsidiary, this has been specified. The quantitative information in this report refers to the 2021 calendar year (1 January 2021 to 31 December 2021), unless otherwise indicated.

### 3.9.3 Verification of the report

Every year, in accordance with the regulations, Eutelsat mandates one of its Statutory Auditors, appointed as an independent third party, to verify the compliance of the Non-Financial Performance Statement and the fair presentation of the information contained therein to be included in the consolidated management report. For this year, Grant Thornton is the independent third-party body entrusted with this task.

The verification of the non-financial reporting information was carried out with the entities that contribute the most to the consolidated financial statements. In view of the Covid-19 public health crisis, this verification work was carried out remotely.

