

# GROUPE LA POSTE HUMAN RIGHTS POLICY

*« Protecting, upholding and promoting human rights is the cornerstone of our CSR commitment »*

## AN AMBITIOUS POLICY

*La Poste has made its CSR commitments central to its business model and strategic plan. In 2021, it became a mission-driven company, in a bid to leave a positive impact on society as a whole. Protecting, upholding and promoting human rights is the cornerstone of its CSR commitment.*

The United Nations defines human rights as "rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status. Human rights include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, and many more. Everyone is entitled to these rights, without discrimination."

These rights are recognised and spelled out in multiple international conventions and commitments, including:

- the **Universal Declaration of Human Rights** ;
- the **United Nations Guiding Principles on Business and Human Rights** ;
- the Declaration and **Fundamental Conventions of the International Labour Organization**<sup>1</sup> ;
- the **OECD Guidelines for Multinational Enterprises** ;
- as well as the Principles of the **United Nations Global Compact**.

*Groupe La Poste, which includes La Poste SA, La Banque Postale, CNP Assurances and Geopost, is a member of the United Nations Global Compact.*

These standards serve as **guidance for the Group**, and it is our intention **to set an example** in the way we protect, uphold and promote these standards throughout our work.

Human rights are incorporated into an **ambitious policy** that governs our activities as an **employer**, **procurer** and **service provider**. This policy is promoted by the Executive Committee and the Group and subsidiary management bodies, and aids in implementing our due diligence obligations<sup>2</sup>. It is supplemented by our occupational health and safety commitments<sup>3</sup>, our environmental commitments<sup>4</sup> and our personal data protection commitments<sup>5</sup>.

<sup>1</sup> Conventions 87 and 98 on freedom of association and the right to collective bargaining; Conventions 29 and 105 on forced labour; Conventions 138 and 182 on child labour; Conventions 100 and 111 on non-discrimination. La Poste also adheres up to Convention 190 on violence and harassment.

<sup>2</sup> Due diligence procedures are detailed in an appendix to our Universal Registration Document, available at <https://www.lapostegroupe.com/>.

<sup>3</sup> Our Quality of Life and Occupational Health & Safety Policy is available at <https://www.lapostegroupe.com/>.

<sup>4</sup> Our commitments to the environment and social inclusion are detailed in our Single Registration Document and CSR policy, available at <https://www.lapostegroupe.com/>.

<sup>5</sup> Our Personal Data Protection Policy, drawn up in accordance with the General Data Protection Regulation (GDPR), is described in our DATA Charter, available at <https://www.lapostegroupe.com/>.

## OUR COMMITMENTS

Groupe La Poste **pledges** to :

- prevent all forms of **human rights violations** and make sure it is not complicit in human rights abuses ;
- prohibit all forms of **physical or psychological abuse**, and more generally all forms of inhumane, cruel or degrading treatment ;
- prohibit all forms of **forced or compulsory labour, child labour** and human trafficking<sup>6</sup>;
- prohibit all forms of **discrimination**<sup>7</sup> based on gender, age, health or disability status, pregnancy, sexual orientation, nationality, social origin, membership in a community, political, religious or trade-union beliefs, etc ;
- uphold **freedom of association** and the **right to collective bargaining** ;
- uphold the right to **decent pay** ;
- oppose all forms of **privacy violations**.

Groupe La Poste is **firmly committed** to upholding the General Data Protection Regulation (GDPR). **It refrains from any action that may violate the privacy** of its staff, providers or subcontractors.

*La Poste guarantees the confidentiality of correspondance and protects their contents. Our mail carriers swear an oath to "scrupulously respect the integrity, inviolability and secrecy of correspondance, including electronic correspondance".*

**We conduct our work in accordance with the labour laws of each country** where we operate. Where local provisions may limit the human rights protections stipulated in international standards, **we search for the best solutions to adhere to these protections** as closely as possible for our and our subcontractors' employees.

<sup>6</sup> As defined by the ILO.

<sup>7</sup> As mentioned in Article 225-1 of the French Criminal Code.

### AN EXEMPLARY EMPLOYER

*Because we strive to set an example, Groupe La Poste promotes human rights in its HR policies and processes and its social dialogue, expanding and building upon international commitments.*

We are committed to maintaining quality working conditions, combatting discrimination and preventing all forms of workplace violence, with **proactive measures** designed to :

- **promote equality** in the workplace and **combat sexism**;
- prevent and address instances of bullying and sexual **harassment** ;
- support victims of **domestic violence** ;
- open up our jobs to the **disabled** ;
- promote **diversity** and **inclusion** and **combat prejudice** and **stereotypes**.

La Poste and its French subsidiaries regularly sign **labour agreements** that promote human rights with representative trade unions<sup>8</sup>.

La Poste SA, La Banque Postale, CNP Assurances, Geopost, Médiapost and Dicaposte have drawn up codes and policies that lay out their commitments to upholding diversity, promoting inclusion and combatting discrimination.

- Groupe La Poste is a signatory to the **Diversity Pledge**.
- The Services-Mail-Parcels Business Unit has been awarded the **Diversity Label**.
- La Poste SA is committed to non-discrimination and implements this principle in its internal rules.
- La Banque Postale has drawn up a manifesto on equality opportunity, diversity and inclusion.
- Geopost has incorporated the principles of diversity, inclusion and non-discrimination into its Code of Conduct.

**Communication campaigns** are regularly organised to promote these principles to employees.

Our **international operations** are mainly conducted by **Geopost** subsidiaries in nearly 50 countries worldwide. These transportation and delivery companies are careful **to uphold human rights in the countries where they operate**. They are particularly **attentive to individuals more vulnerable** to human rights abuses, including women, children, disabled workers, national, ethnic, religious or linguistic minorities, and migrant workers.

*In 2017, Geopost signed a Group-wide agreement with UNI Global Union, as well as a number of local agreements that re-affirm its commitment to fundamental human rights and freedom of association throughout its value chain.*

*Geopost subsidiaries implement this commitment through local action designed to prevent and mitigate human rights-related risks in the countries where they operate.*

<sup>8</sup> Measures concerning pay, working hours, leave, health coverage, gender equality, the disabled, etc... are regularly subject to labour agreements at La Poste SA.

## A RESPONSIBLE AND ETHICAL PROCURER AND COMMERCIAL PARTNER

*Upholding human rights is a responsibility that Groupe La Poste imposes on suppliers, providers and subcontractors with which it has an established business relationship, as well as their employees.*

We are a responsible and ethical procurer, working with our partners **to make progress together**.

Wherever possible, we prioritise suppliers, providers and subcontractors that **share all of our values**. We pledge not to pressure them into infringing on human rights or basic freedoms. These principles are included in our contracting policies.

Our **Responsible Purchasing Policy** lays out the steps we take to be a responsible procurer.

To follow through on our commitments, our **Responsible and Ethical Purchasing Charter**<sup>9</sup> specifies a number of **reciprocal human rights commitments** between the Group and its suppliers that apply at every stage of the contractual and service relationship, in France and abroad, including when services are provided on postal sites.

**Reciprocal commitments** for the Group and its suppliers :

- **uphold, promote and implement the principles of the Universal Declaration of Human Rights**, the United Nations Global Compact and its guidelines, the OECD Guidelines and the Fundamental Conventions of the ILO ;
- **comply with the laws** regarding working hours, pay, training, labour rights and freedom of association, and illegal or concealed work ;
- **respect the rights of tribal and indigenous peoples** and communities ;
- **avoid all forms of discrimination** and promote equal opportunity in the workplace ;
- ensure that services and products are **safe for end users and produced in a way that respects the basic rights** of individuals and communities ;
- Whenever an employee of the Group or an outside company is reported to be involved in a human rights violation on a postal site, **take appropriate steps with the company concerned**.

<sup>9</sup> Our Responsible Purchasing Policy and our Responsible and Ethical Purchasing Charter are available at <https://www.lapostegroupe.com>. This charter also includes other commitments, particularly related to occupational health and safety.

*The Group's companies sometimes develop responsible purchasing charters specific to their sector or region that detail their human rights requirements.*

*This is the case for La Banque Postale, as well as Geopost, whose own charter is being integrated into its subsidiaries' contracting policies.*

Groupe La Poste **verifies the implementation of these commitments** through audits and operational oversight.

- In the event of any breach of these principles, a **corrective action plan** is drawn up and implemented jointly with the partner.
- In the event of any serious human rights abuses, **La Poste may terminate the contractual relationship early.**

Human rights protections are factored into our analysis and assessment of **partnership ventures** and **merger & acquisition** deals.

## SUPPORTING HUMAN RIGHTS AS A BANK-INSURER

*La Banque Postale and its subsidiaries incorporate human rights issues into their business policies<sup>10</sup>.*

For its **finance and investment activities**, La Banque Postale has adopted a **Responsible Finance and Investment Charter** and a number of **stringent exclusion policies** that cover certain countries, businesses and organisations. These policies apply in the event of serious and repeated violations of the Principles of the United Nations Global Compact, international codes and conventions, as well as violations of union rights and the basic human rights of employees, subcontractors and suppliers.

In its **asset management activities**, La Banque Postale Asset Management promotes human rights and gender equality.

*For its socially responsible investment (SRI) funds, La Banque Postale<sup>11</sup> selects businesses that are committed to supporting human rights and gender equality.*

*It excludes any issuers suspected of committing serious and/or repeated violations of the Principles of the United Nations Global Compact.*

*The LBPAM SRI Human Rights savings fund excludes businesses involved in activities considered harmful to human rights, as well as businesses dealing with serious controversies involving human rights, workers' rights or corruption.*

*Every year, the fund donates half of its revenue or management fees to the International Federation for Human Rights (FIDH).*

Its proprietary **non-financial analysis** method, GREaT, relies on environmental, social and governance criteria (ESG).

As part of its **responsible investment strategy**, CNP Assurances invests in its various asset classes in accordance with the Principles for Sustainable Insurance and the Principles for Responsible Investment<sup>12</sup> to which it is a signatory.

<sup>10</sup> La Banque Postale is a signatory to the Principles for Responsible Banking, the Principles for Responsible Investment, the Principles for Sustainable Insurance and the Equator Principles.

<sup>11</sup> Via its subsidiary LBP Asset Management.

<sup>12</sup> These principles seek to promote the integration of environmental, social and governance (ESG) criteria in insurance and investment activities and decision-making (<https://www.unepfi.org> and <https://www.unpri.org>).

## CONSTANTLY WORKING TO PROMOTE AND UPHOLD HUMAN RIGHTS

*Every year, Groupe La Poste and its subsidiaries assess the risk of serious human rights abuses and violations of basic freedoms linked to their own activities or the activities of their suppliers, in accordance with France's due diligence law.*

A **risk map** is used to develop the **Group's Vigilance Plan** and its risk prevention procedures<sup>13</sup>. The **Due Diligence Steering Committee** is responsible for **governing these processes at Group level**.

**Internal communication campaigns** and **training sessions** inform the Group's employees of its human rights commitments..

*Employees have a dedicated whistleblowing system<sup>14</sup> to report any violations of human rights and basic freedoms witnessed in the course of their work.*

*A similar whistleblowing system<sup>15</sup> has been set up for employees of the Group's suppliers and subcontractors.*

Groupe La Poste maintains **relations and shares best practices with multiple Non-Governmental Organisations and associations**<sup>16</sup> on issues related to human rights in the workplace.

**If human rights principles are found to be violated**, the Group immediately takes corrective action. **Disciplinary measures** may be imposed on employees, and **penalties applied** to commercial partners.

<sup>13</sup> The Vigilance Plan is presented in our Universal Registration Document, available at <https://www.lapostegroupe.com/>.

<sup>14</sup> Available at : <https://www.alerte-ethique.laposte.fr/>

<sup>15</sup> Available at : <https://www.alerte-vigilance.laposte.fr/>

<sup>16</sup> Examples for La Poste SA and/or some of its subsidiaries :

- Human rights : Entreprises pour les Droits de l'Homme (EDH).
- Inclusion and non-discrimination : Association Française des Managers de la Diversité (AFMD), Fondation Agir Contre l'Exclusion (FACE), Entreprises pour la Cité, réseau des Écoles de la 2ème Chance, fondation femmes@numérique, club Landoy, l'Autre Cercle, association Pas@pas, Stop Illettrisme, etc.
- Violence against women : OneInThree Women, Fédération Nationale des Centres d'Information sur les Droits des Femmes et des Familles (FNCIDFF).