

COMMIT **TODAY FOR TOMORROW**

Vigilance







June 2022 1st VERSION

CONTENTS

OURBUSINESSMODEL

- 1. Our worldwide operations
- 2. Our business model
- 3. Our value chain

- 1. Coordination of vigilance plan
- 2. Whistleblowing procedure
- 3. Reporting methodology

1. Methodology

- 1.1 Identification of inherent duty of care risks
- 1.2 Analysis of own operations and those of tier 1 suppliers
- 1.3 Analysis of actions taken to limit the identified risks

2. Description of identified risks

- 2.1 Human rights
- 2.2 Health and safety
- 2.3 Environment

3. Risk mapping

- 3.1 Mapping of risks inherent in our own operations
- 3.2 Mapping of tier 1 supplier inherent risks



5

8

8

8

10

MITIGATION MEASURES IN FORCE TO ADDRESS THE IDENTIFIED RISKS IN THE LOXAM GROUP

1. A structured CSR approach

2. Details of main measures to control our identified ris

- 2.1 Measures to control our human rights risks
- 2.2 Measures to control our health & safety risks
- 2.3 Measures to control our environmental risks
- 2.4 Measures to control risks among our suppliers

RONGLIS

Annex 1 – Detail of exposure of our geographies by type of inherent risk Annex 2 – Reporting indicators

sks		

10 11 11

12 12 12

14 14



Introduction

tier 1 suppliers.

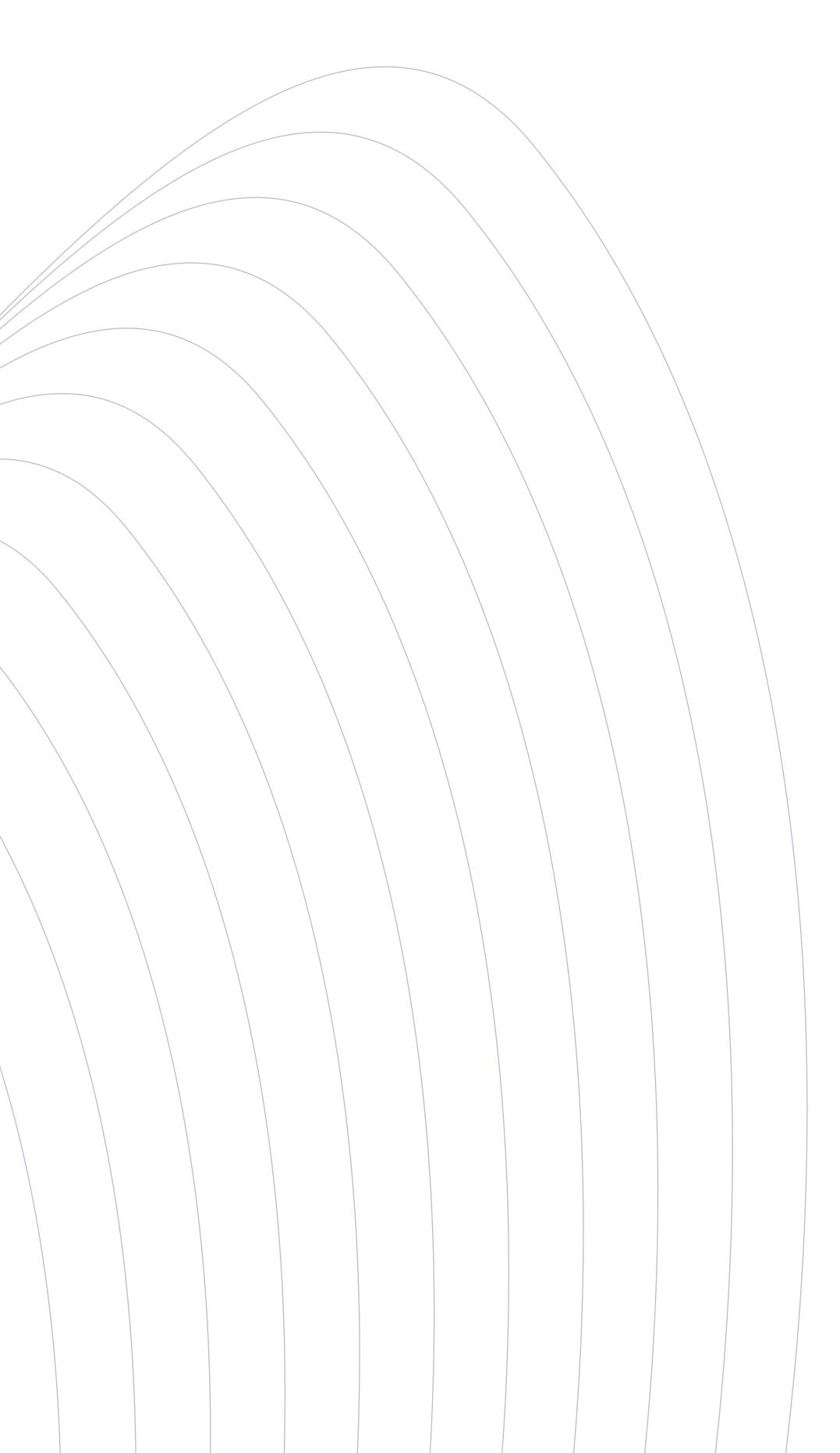
It introduces a legal framework establishing firms' accountability for the social and environmental impacts of their activities. This law obliges companies such as Loxam to implement a vigilance plan and to report on the actions taken under this plan.

As the European leader in equipment rental, the Loxam Group currently generates a turnover of more than 2 billion euros, thanks to its more than 11,000 employees, spread across a network of more than 1,000 branches in 30 countries and on 4 continents. The business model is based on a close relationship with its clients through mainly short-term rental contracts.

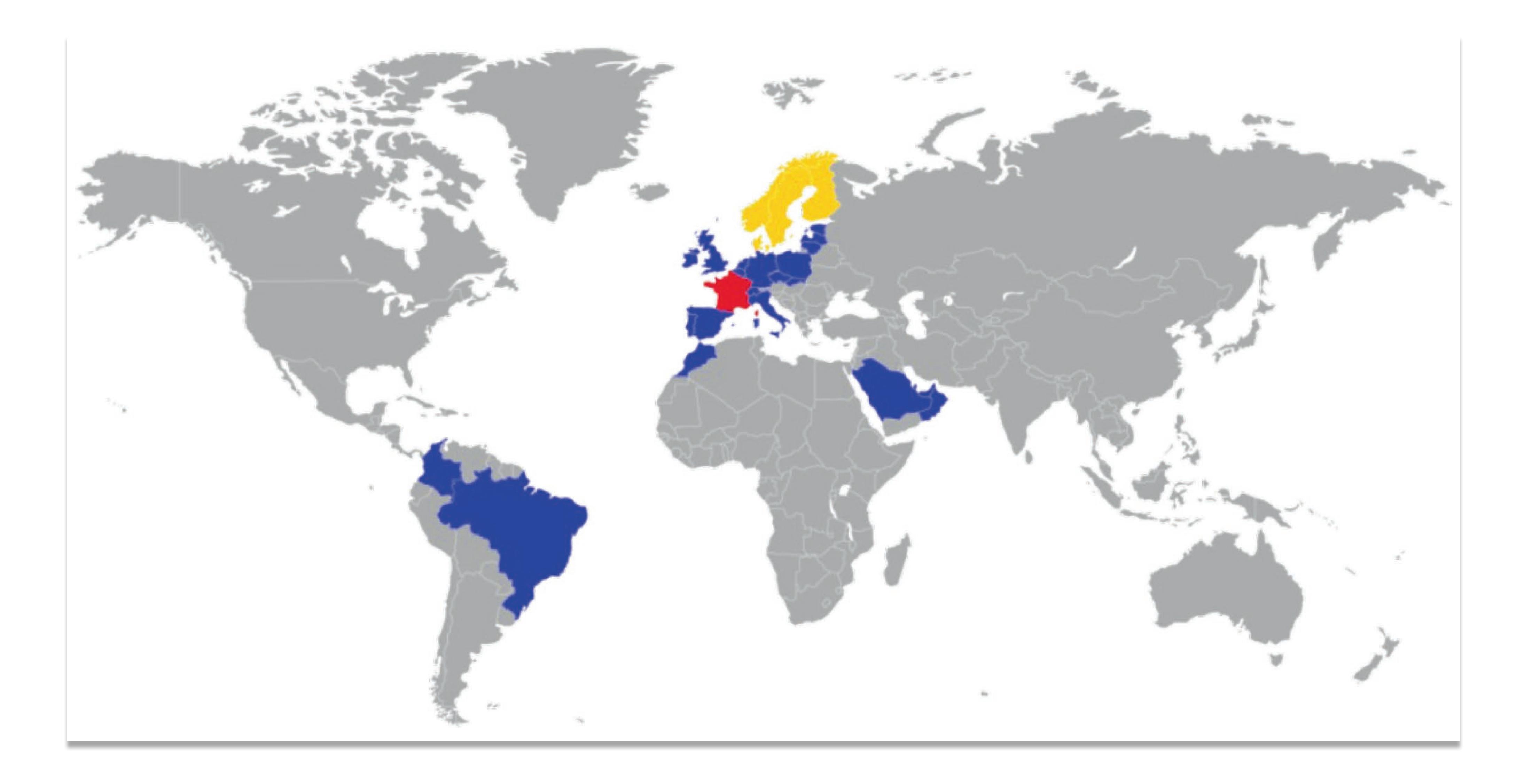
Our corporate culture is based on strong values of responsibility. We ensure that our employees have impeccable working conditions to enable them to develop in complete safety, and we are attentive to the protection of the environment. We ensure that the demands we place on ourselves are passed on to our entire value chain, and in particular to our suppliers, with whom we maintain relationships based on trust and proximity.

This vigilance plan is however only a summary of the environmental and social risk management actions historically undertaken within the company.

The French law n°2017-399 of 27 March 2017 on the duty of care of parent companies and contractors requires companies to assess and monitor the environmental and social impacts of the operations of their own activities and of their



Our business model Our worldwide operations



Loxam footprint as at 31/12/2021

The consolidation scope encompasses the following countries: France: the Group's historical base, generating 42% of global turnover Historical perimeter: the countries outside France which were the first to join the Group, partly supervised by support functions in France (in particular HR and HSE). These countries include Denmark, the Netherlands, Belgium, Luxembourg, Germany, Switzerland, Italy, Ireland (Swan), Morocco and Brazil. Loxam Hune: Spain, Portugal, Colombia, Saudi Arabia (Sico) Powered Access Division: United Kingdom, Ireland, Middle East (Bahrain, Kuwait, Oman, Qatar, United Arab Emirates, Saudi Arabia)

Ramirent: Norway, Sweden, Finland, Estonia, Latvia, Lithuania, Poland, Czech Republic, Slovakia.





VISION

Offer safe, sustainable and efficient solutions to make equipment rental a natural choice.

VALUES

OUR ASSETS

COMMITTED AND SKILLED TEAMS

- 11,000 EMPLOYEES
- Training programme

AN EQUIPMENT FLEET OF 650,000 MACHINES

- Unrivalled depth and width of range
- Systematic check-up of all equipment between every rental
- Consideration for the entire life cycle of each machine (in-house equipment recycling centre)



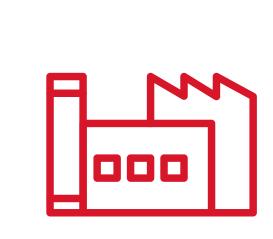
Sense of **service**, desire for **continuous improvement**, ability to **innovate**



SUPPLIERS



BUILDING



INDUSTRY

MANAGEMENT

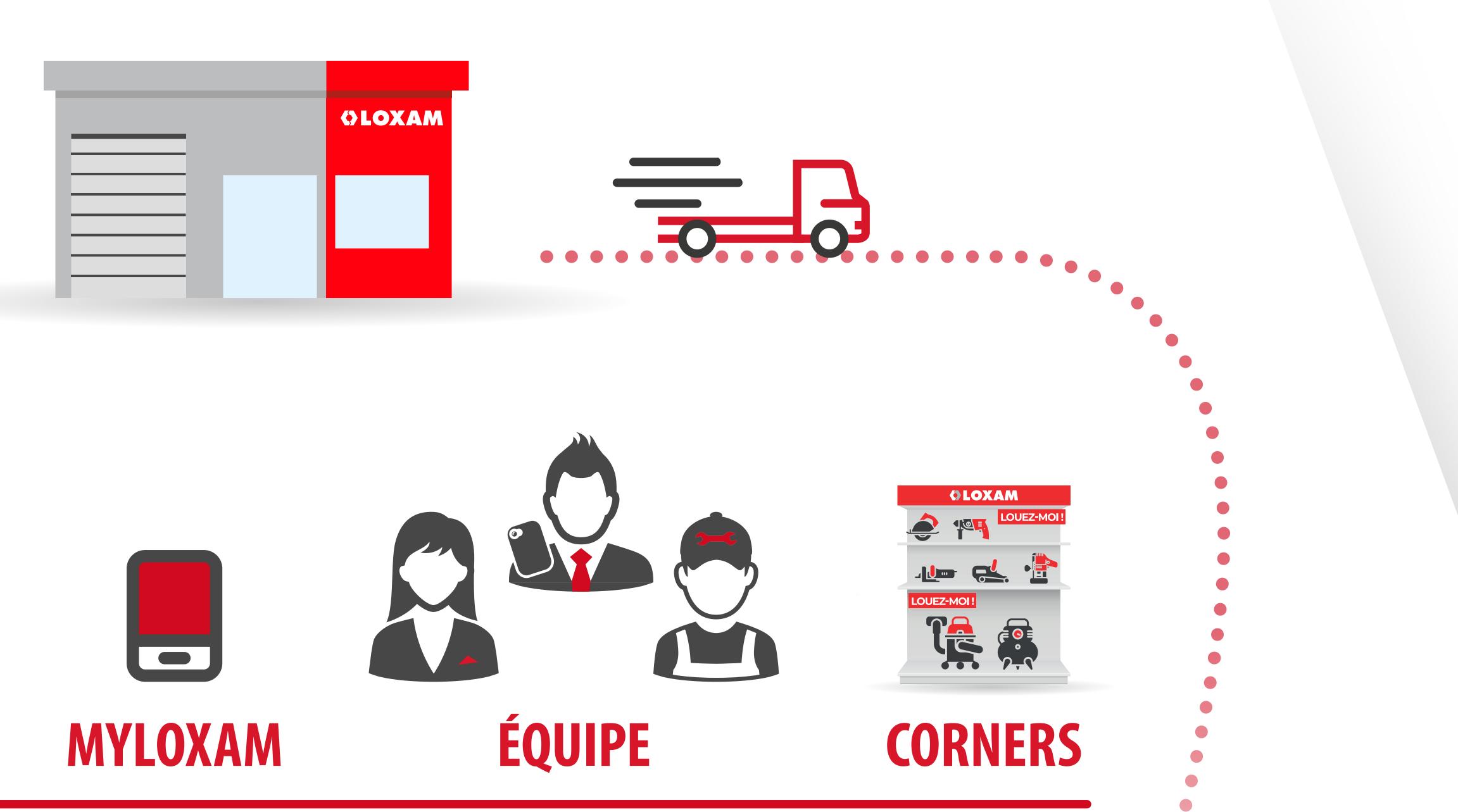




Accelerate in digital development

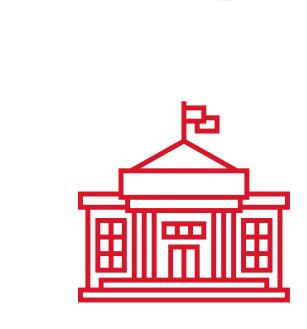
OUR ACTIVITIES





Offer a service proposition catering to the needs of all clients, whatever the sector or size of their company.





LOCAL **AUTHORITIES**







Be the **leader** in sustainable rental

Decarbonise our activities

VALUE CREATED IN 2021

ECONOMIC AND FINANCIAL

EZBN-- TURNOVER

SERVICE QUALITY

 Voted Customer Service of the Year (ESCDA) for 5th year running Net Promoter Score

HUMAN

- Annual employee training plan
- Career management
- Promotion of diversity

ENVIRONMENTAL

- Yearly increase of our CAPEX in low-emission equipment
- Committed to a carbon trajectory

SOCIETAL

- Responsible purchasing policy
- Ethical and responsible relations: training, supplier assessment
- Involvement in philanthropic initiatives (corporate patronage)

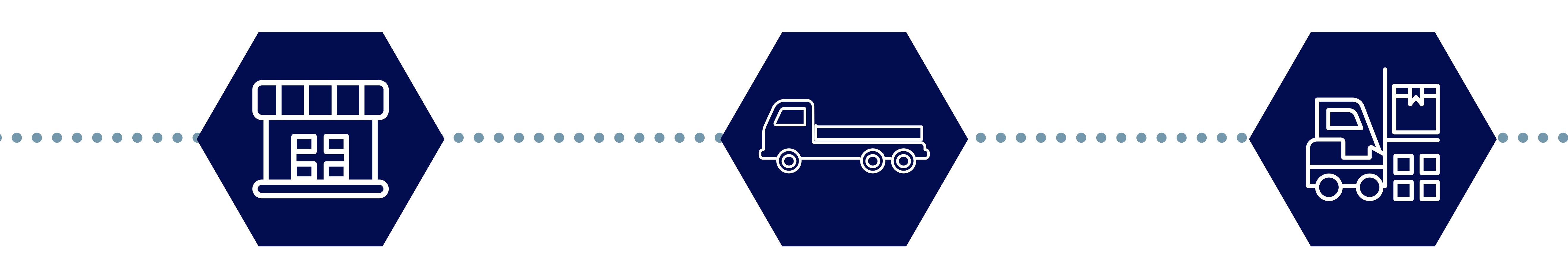




Production of our equipment

Apart from a wooden shelter factory in our subsidiary Ramirent, we do not manufacture any of our equipment. We buy it primarily from leading original equipment manufacturers (OEMs) with which we maintain relations of trust, which does not however preclude a certain number of control mechanisms.

Our value chain can be depicted as follows. In different areas, it draws on contributions from suppliers and clients:



Equipment maintenance and preparation

Our equipment is maintained and prepared in our 1,000 branches around the world. Each branch is responsible for its own equipment fleet and has a team of technicians to carry our maintenance. Third parties may occasionally be called upon to back up our teams or when specific expertise is required. They are required to comply with stringent rules.

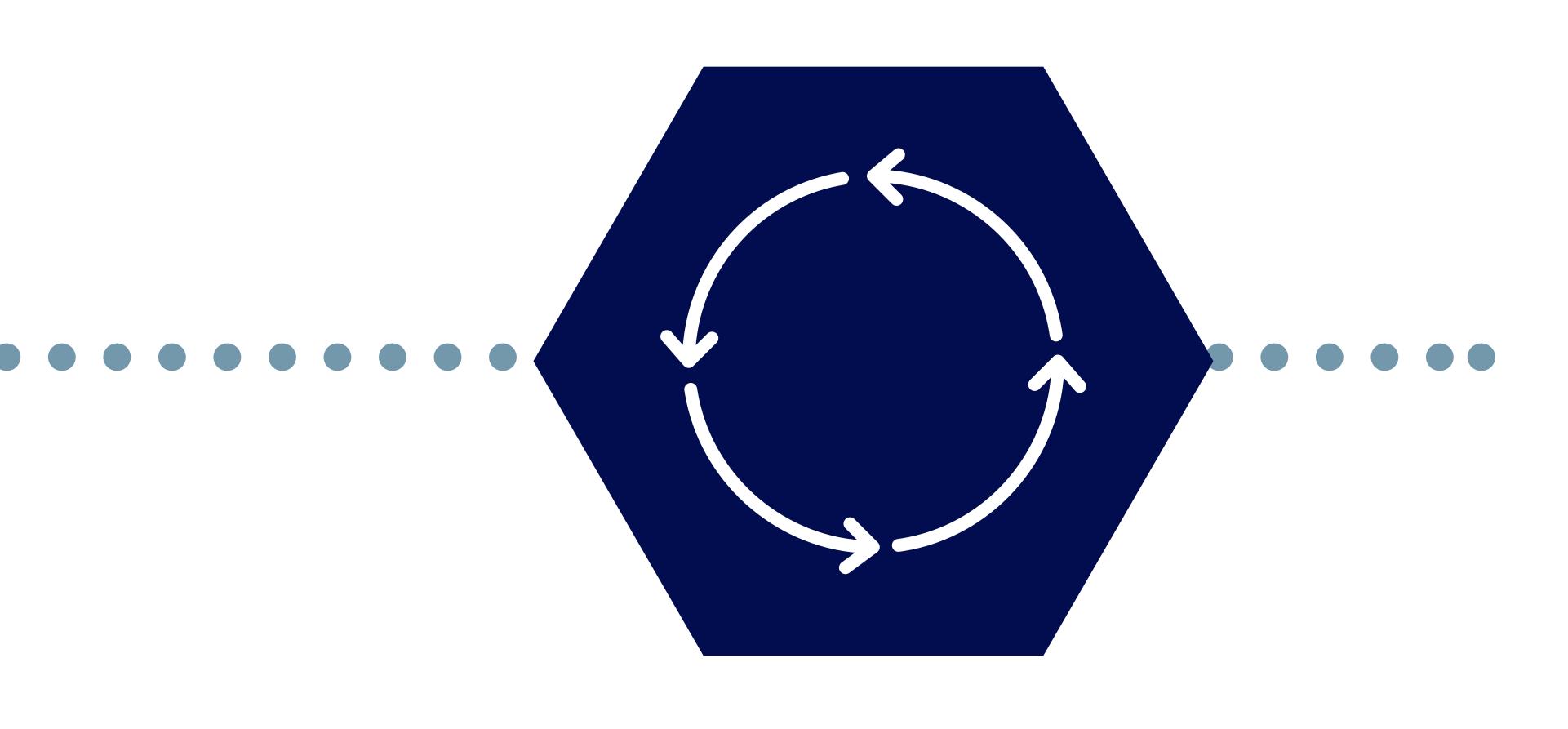
Equipment transport

Every day, hundreds of trucks travel around the regions in which we are established to deliver equipment to our clients directly on their work sites. Equipment transport is either performed in-house by our teams of drivers, or outsourced to listed contractors.

Loxam Group value chain across all its geographies

Equipmentuse

Our 650.000 items of equipment are used every day by our clients. In addition to legally required checks and the proper provision of all necessary documentation, we seek to deploy a policy of awareness and co-innovation to provide our clients with ever safer and more sustainable equipment.



Equipment end-of-life management

Our technical teams deal with the decommissioning and disposal of our equipment. All our equipment is reconditioned and sold on auction platforms if its condition allows so, or recycled while ensuring strict compliance with local environmental standards.



Ourgovernance Coordination of vigilance plan

Our vigilance plan is currently managed at Group level by the Finance Administration department, with the support of the Sustainable Development department. The HSE and HR departments within our business units are the operational representatives in charge of monitoring the implementation of the plan with regard to the Loxam Group's own operations. The purchasing departments are responsible for implementing the plan for actions undertaken with our suppliers.

A vigilance committee is created in 2022 and convenes at least once a year under the chairmanship of the Group Managing Director, in the presence of the Group Strategy Director, the Chief Financial Officer, the General Secretary, the Finance Administration Director, the Chief Legal Officer, the Purchasing Director and the Sustainable Development Director.

As the cornerstone of the monitoring and assessment process, this committee's missions are to:

- Approve the vigilance plan and the conclusions of the risk mapping;
- Statement);
- Monitor the results of the action plans and decide upon the next steps;
- Where necessary, monitor the whistleblowing reports entering into the scope of the law.

Whistleblowing procedure

In accordance with legal requirements, the Loxam Group has a whistleblower hotline to report situations that fall within the scope of the duty of care. This procedure puts the whistleblower in direct contact with an ethics officer via a dedicated e-mail or telephone number, in the language of the caller. The alert procedure is also open to external parties and can be accessed online.

• Monitor the performance indicators which are an integral part of the non-financial reporting (Non-Financial Performance



Reporting methodology

As the actions described in this plan are an integral part of the Loxam Group's sustainability strategy, reporting on the actions undertaken will be directly integrated into the Non-Financial Performance Statement published annually on the Group's website (www.loxam.com).



Our risk analysis

Methodology

Identifying the risks inherent in the Loxam Group's activities and the actions to be taken to limit these risks falls within the scope of a continuous improvement approach, a method in which the Group is proficient, having long been committed to a certification process for all its business units (ISO9001, ISO14001, ISO45001).

This vigilance plan will therefore be regularly reviewed to update the risk mapping and the measures taken.

This first vigilance plan was drawn up with the help of an external consultancy firm using a three-step method.

► 1.1 IDENTIFICATION OF INHERENT DUTY OF CARE RISKS

Based on our business model and the list of geographies where we operate, we conducted an initial mapping of the inherent duty of care risks, both on our own operations and on our direct and indirect suppliers, covering the entire Group.

To identify and assess these risks, we used reports from various public and non-governmental organisations (World Justice Project, US Department of State, UNICEF, INSEE, OECD, Yale, etc.).

Three main types of risk resulted from this work:

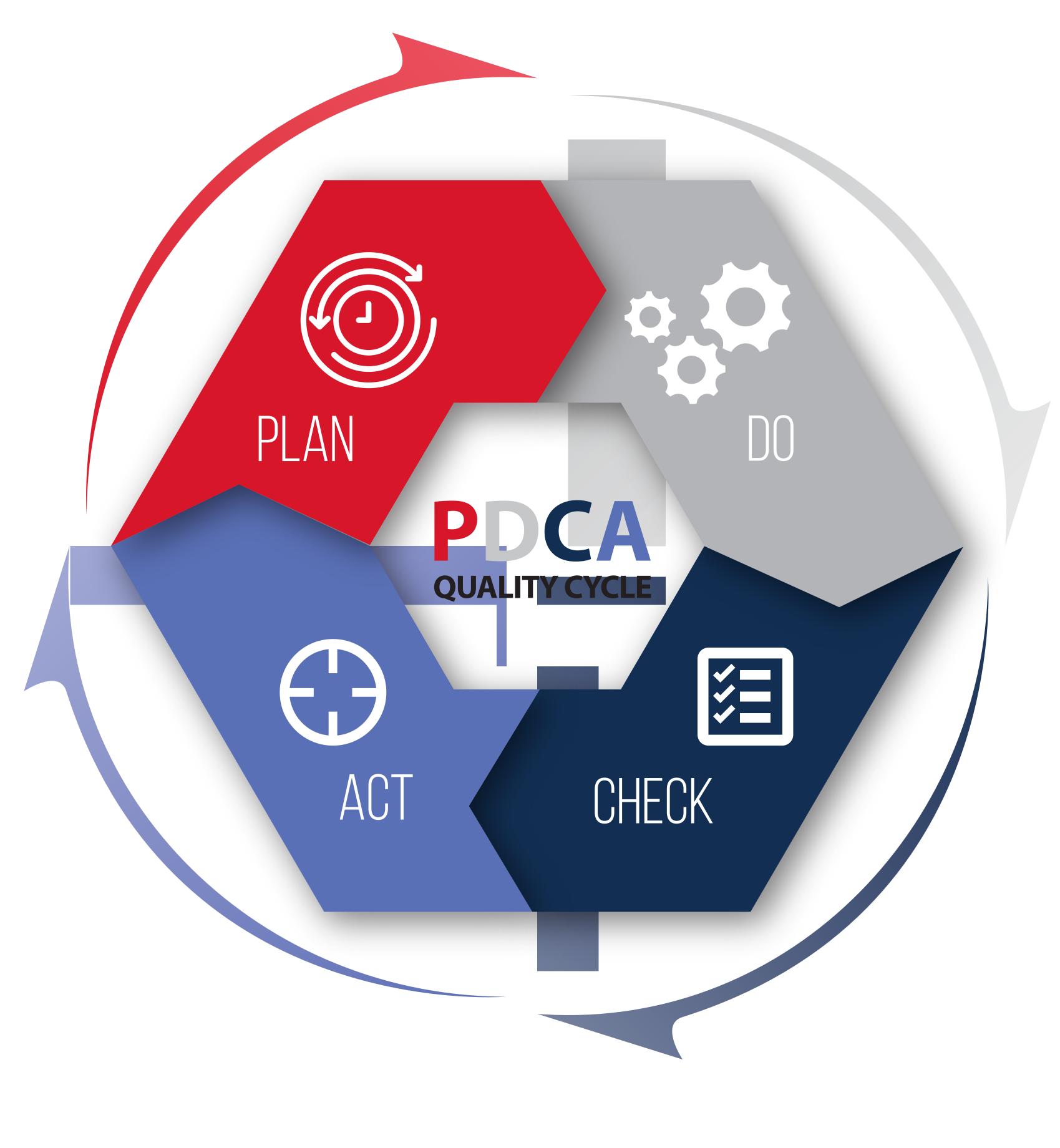
- rights;
- accidents;

The risks identified by category are described in detail in paragraph 2 below. All of them entail strong reputational risks for the Group.

• Human rights: child labour, forced labour, freedom of association, discrimination, failure to respect migrant workers'

• Personal health and safety: excessive working hours, inadequate social benefits, harassment, inadequate pay, workplace

• Environment: contribution to climate change, air pollution, water and ground pollution, waste management.



> 1.2 ANALYSIS OF OWN OPERATIONS **AND THOSE OF TIER 1 SUPPLIERS**

Based on the risks identified, the exposure of Loxam was analysed for each of the Group's geographies.

To analyse the Group's own operations, the workforce data per country was used to identify the main areas of exposure.

To analyse tier 1 suppliers, actual and estimated purchasing data were combined to identify the main areas of exposure:

- The countries in which equipment suppliers operate was estimated through a survey. Most of the equipment suppliers are large companies, established in Western countries, potentially subject to similar regulations and also with much at stake for their reputation in terms of their CSR and duty of care approach. Although excluded from the strict scope of Loxam's duty of care, their own suppliers, i.e. Tier 2 suppliers for the Loxam Group, could be more exposed. Joint actions between Loxam and its main suppliers could therefore be undertaken to jointly monitor them.
- With regard to our indirect purchases, each of our branches enjoys a certain amount of autonomy in listing its suppliers. Nevertheless, as a branch operates within a radius of less than 100 km with companies in the country, the assumption can be made that the countries in which suppliers are established are the countries where purchases are made.

1.3 ANALYSIS OF ACTIONS TAKEN TO LIMIT THE IDENTIFIED RISKS

Once the risks had been identified and qualified according to our exposure to them, interviews were held with the HR, HSE and purchasing departments of the various business units to identify the actions currently in place to control these risks. These actions are detailed in part 3 of this document.





> 2.1 HUMAN RIGHTS

Risk	Examples	Possible causes	Possible consequences			
Child labour	Children working illegally in our branches or on our suppliers' equipment assembly chains	Poverty of local population or existence of major informal network	Negative impact on school enrolment or on the child's health			
Forced labour	Workers in an insecure position who may be exploited as part of our operations	Adverse cultural and legal environment	Failure to respect workers' rights (pay, leave, difficulty in terminating work contract)			
Freedom of association	Impossibility for workers to benefit from representation before the company's managerial bodies	Adverse legal environment, or even a situation banning freedom of association	Negative impact on social climate			
Discrimination	Discrimination against a person owing to their gender, sexual orientation, disability or social situation	Lack of HR procedures and checks in this area Lack of training of managers	No equality between employees, leading to the alienation of some employees			
Failure to respect the rights of migrant workers	Immigrant workers exploited on one of our sites or at a supplier or subcontractor, on the basis of their status	Adverse cultural and legal environment	Failure to respect workers' rights (pay, leave, difficulty in terminating work contract)			
Inadequate pay	Workers in an insecure position who may be exploited as part of our operations	Adverse cultural and legal environment	Creation of personal insecurity			
Inadequate social benefits	Non-coverage of health and social security costs	Adverse legal environment	Creation of personal insecurity Lasting health problems			
Excessive working hours	Working hours exceeding those defined by international labour conventions	Management pressure Adverse legal environment	Mental or even physical health problems			
Harassment	Sexual harassment of an employee Bullying of an employee by their manager	Lack of HR procedures and checks in these areas Lack of training and/or disciplinary action against managers	Mental or even physical health problems Deterioration of social climate Lower performance			

> 2.2 HEALTHAND SAFETY

Risk	Examples	Possible causes	Possible consequences
Workplace accidents	An employee falling from height when loading an equipment Use of road space or several machines simultaneously operating on site	Non-compliance with safety rules and procedures	Absence Injury Death

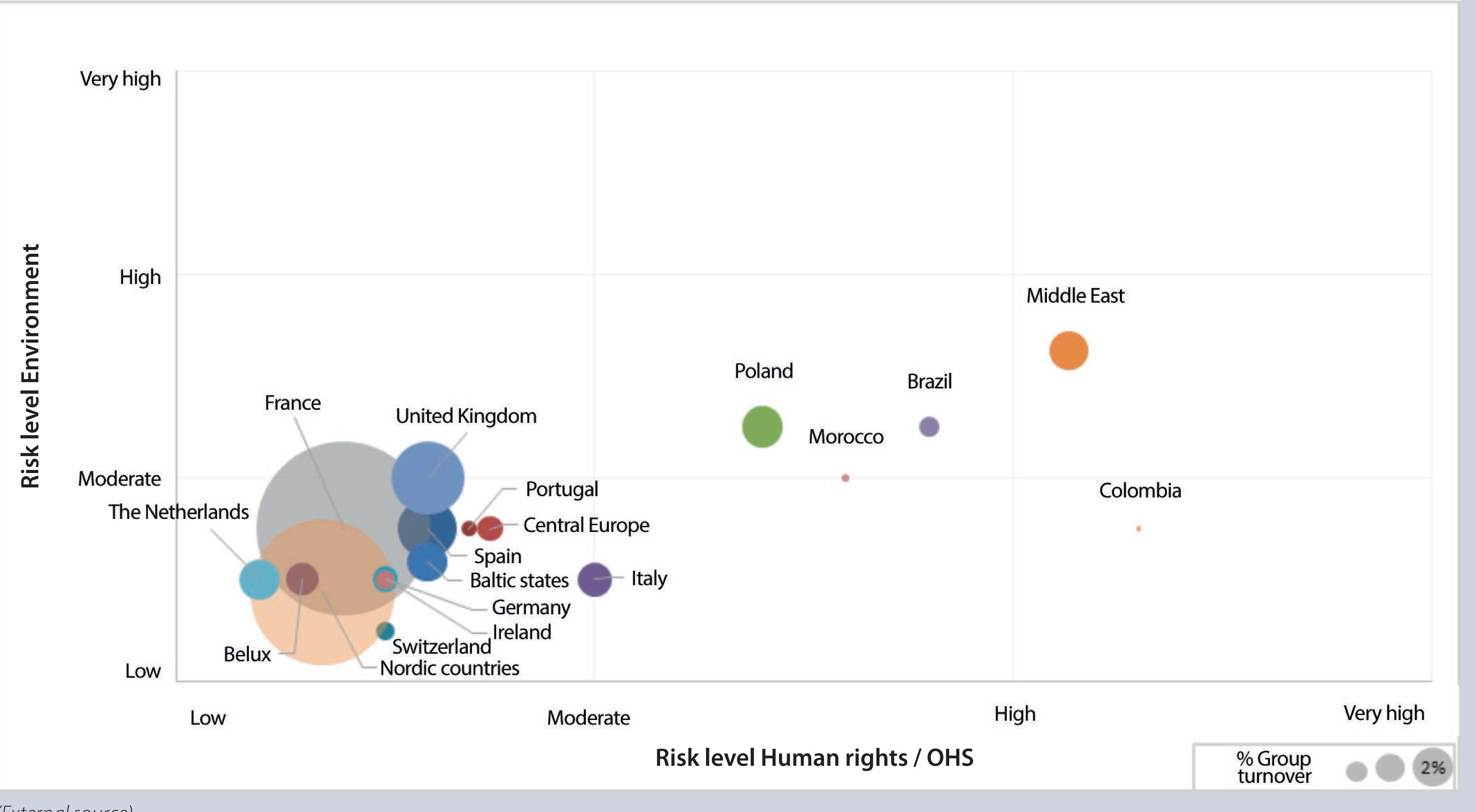
> 2.3 ENVIRONMENT

Risk	Examples	Possible causes	Possible consequences
Contribution to climate change	Keeping old-generation diesel equipment in the fleet	Lack of investment in low-emission equipment	Ban on operating in certain zones Extreme climate events
Air pollution	Exceedance of legal emission limits authorised for our equipment	Aging of our equipment fleet	Operating ban
Water and ground pollution	Discharge of polluted water in our wash bays Leakage of fuel from our equipment in our branches	Ineffective hydrocarbon separators Accidents on one of our equipment items in one of our branches	Fines Harm to ecosystems
Inadequate waste management	Fly-tipping of our broken equipment Non-recovery of our waste	Lack of system to deal with equipment decommissioning and disposal	Fines Harm to ecosystems



Risk mapping ► 3.1 MAPPING OF RISKS INHERENT IN OUR OWN OPERATIONS **BY COUNTRY AND TURNOVER**

This inherent risk mapping is based on external documentation (reports from various agencies and non-governmental organizations), compiled by an external consultancy firm. The risks related to the countries where we operate are presented here, without taking into account any actions implemented by Loxam to reduce them. The rating scale is described below. A detailed mapping by type of risk is available in Annex 1.



(External source)

Moderate risk: a risk encountered on occasion in the country, caused by excessive practices, due to insufficiently strict legal regulations on the subject identified;

High risk: a risk frequently encountered in the country, due to the absence of legislation on the subject and a conducive cultural environment; Very high risk: a risk regularly encountered in the country, due to the absence of legislation on the subject and a cultural environment that is very conducive to its emergence.

The grading scale is as follows. It is based on the average of individual grades (on the same scale) of each risk previously listed: Low risk: a risk that is not prevalent in the country. The regulations in force make it possible to prevent these risks;

The Group operates globally in geographical areas with low to medium risks on all identified items. The majority of its revenues are generated in Europe (France and the Nordic countries).

3.2 MAPPING OF TIER 1 SUPPLIER INHERENT RISKS

This inherent risk mapping is based on external documentation (reports from various agencies and non-governmental organizations), compiled by an external consultancy firm. The risks related to the countries where we operate are presented here, without taking into account any actions implemented by our suppliers to reduce them. The rating scale is previously described.

					Tie	er 1 su	applie	ers				
Country of establishment of tier 1 suppliers	Lange	United Kingdom	Spain	Italy	Germany	Austria	United States	Canada	China	lpdia	South Korea	Japan
% of supply in purchasing volume			84	!%		1	12	2%		3	%	1
HUMAN RIGHTS							•					
Discrimination												
Freedom of association												
Inadequate social benefits												
Forced labour												
Child labour												
Excessive working hours												
Failure to respect migrant worker rights												
Inadequate pay												
Harassment												
HEALTH & SAFETY			,	1			•					
Workplace accident												
ENVIRONEMENT										,		
Contribution to climate change												
Air pollution												
Water / ground pollution												
Inadequate waste management												
(External source)												
Key: O Low risk O Moderate risk O High ris	k OV	ery high	risk									

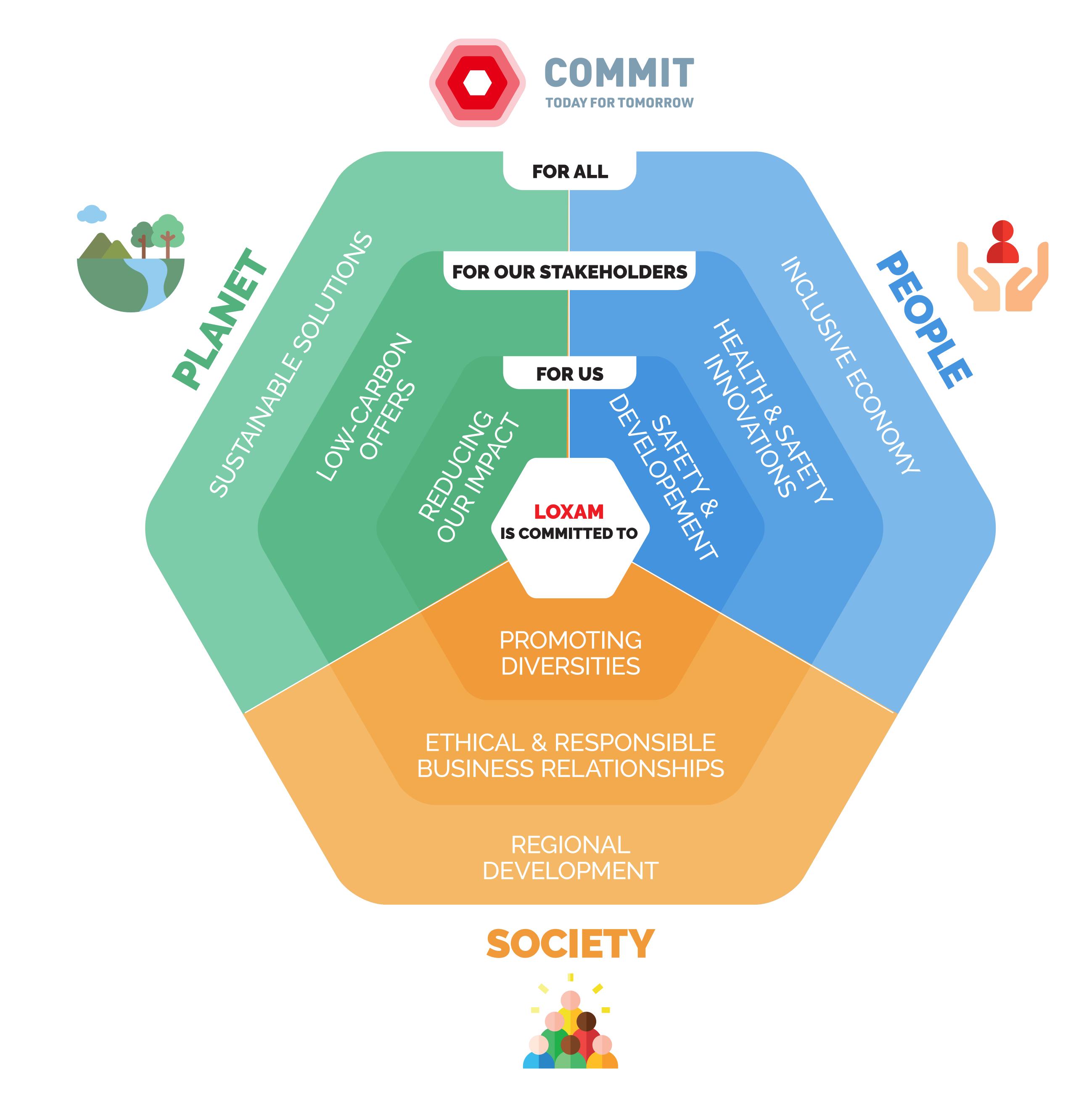


Mitigation measures in force to address the identified risks in the Loxam group

• A structured CSR approach

Our CSR strategy is based on a precise analysis of our main non-financial risks and opportunities, identified through materiality analyses*. In 2021, as part of the structuring of the Group's CSR ambitions, a summary of the existing materiality analyses* was produced. The inherent duty of care risks described above are an integral part of the risks considered in this process.

Based on the risks identified and weighted above, we drew up ambitions that were shared across all our geographies.



Thus, our " Commit today for tomorrow " approach brings together all the commitments we make, across all our geographies and with our partners (clients, suppliers, subcontractors) to address the non-financial risks and opportunities identified.

this, questionnaires were sent to all our stakeholders to ask them about our main challenges.

In practice, this means that across all our geographies, we have:

- A policy that promotes the development of our employees, from the moment they join our company until their departure, by providing them with a healthy and fulfilling working environment and ensuring that the principles of the International Labour Conventions are respected;
- A policy to promote safety, which is deployed within the framework of the ISO45001 certification that we hold Groupwide, and which aims to offer all our employees, but also our partners (subcontractors, clients, suppliers) the conditions to operate in complete safety;
- A proactive environmental policy, which is deployed within the framework of the ISO14001 certification that we hold Group-wide, and which aims to reduce our environmental impact (water and energy consumption, pollution, waste management, etc.) and to provide our clients, in partnership with our suppliers, with low-carbon solutions to meet the challenges of the energy transition;
- An uncompromising ethics policy to conduct transparent business relations, with a code of ethics that is identical in all our business units;
- An internal control system to ensure that the various levels of control (levels 1, 2 and 3) are properly coordinated and that the control mechanisms in place are effective.

Our business units work within the framework of a common policy and commitments. We take care to uphold their autonomy in the operational adaptation of action plans to account for the regulatory, social and cultural specificities of their geographies, so that they can deploy a policy that is relevant in view of the risks they encounter. However, we have an internal audit system that covers all our operations through group or local teams, to precisely monitor all our risks. Details of all our commitments are available in our non-financial performance statement, published on our website (www.loxam.com).

The measures outlined in the following paragraphs address the identified human rights, health and safety, environmental and supplier risks. For each measure, the geographical areas where these measures are in place are identified.

2 Details of main measures to control our identified risks

The deployment of the measures is evaluated according to the following scale and categorized according to 3 axis: procedures/training/controls.

Key: Oeployed OPartly deployed

> 2.1 MEASURES TO CONTROL OUR HUMAN RIGHTS RISKS

Measures in place	France	Historical perimeter	Powered Access Division	Ramirent	Procedure (1) Training (2) Control (3)
Existence of a policy					(1)
Group code of ethics					(1)
Access to whistleblowing system					(1)
Possibility to benefit from social dialogue bodies					(1)
Great Place to Work survey					(1)
Employee ethics training					(2)
Internal audits					(3)

► 2.2 MEASURES TO CONTROL OUR HEALTH & SAFETY RISKS

Measures in place	France	Historical perimeter	<section-header></section-header>	Powered Access Division	Procedure (1) Training (2) Control (3)
Existence of a policy					(1)
Safety procedures for all positions					(1)
Provision of personal protective equipment					(1)
ISO 45001 certification					(1), (3)
Employee training					(2)
At least monthly awareness actions					(2)
Assessment of professional risks					(3)
Internal audits					(3)



> 2.3 MEASURES TO CONTROL OUR ENVIRONMENTAL RISKS

Measures in place	France	Historical perimeter	<section-header><section-header></section-header></section-header>	Powered Access Division	Bamirent	Procedure (1)Training (2)Control (3)
ISO 14001 certification						(1), (3)
Wash bay policy						(1)
Pollution control						(1)
Equipment end-of- life management (reconditioning or recycling)						(1)
Waste management						(1)
Investment in low emission equipment						(1)
Employee training						(2)
Analysis of environmental risks						(1)
Monitoring of resources						(3)
Internal audits						(3)

> 2.4 MEASURES TO CONTROL RISKS AMONG OUR SUPPLIERS

Suppliers	Measures in place	France	Historical perimeter	<section-header><section-header><section-header></section-header></section-header></section-header>	Ramirent	Procedure (1) Training (2) Control (3)
	Document on responsible purchasing					(1)
OEM (Original	Mention of CSR undertakings in contracts					(1)
Equipment Manufacturer) Supplier meetings Ecovadis assessment of suppliers					(1), (2)	
	assessment					(3)
	Site audits					(3)
INDIRECT	Document on responsible purchasing					(1)
PURCHASES	Mention of CSR undertakings in contracts					(1)

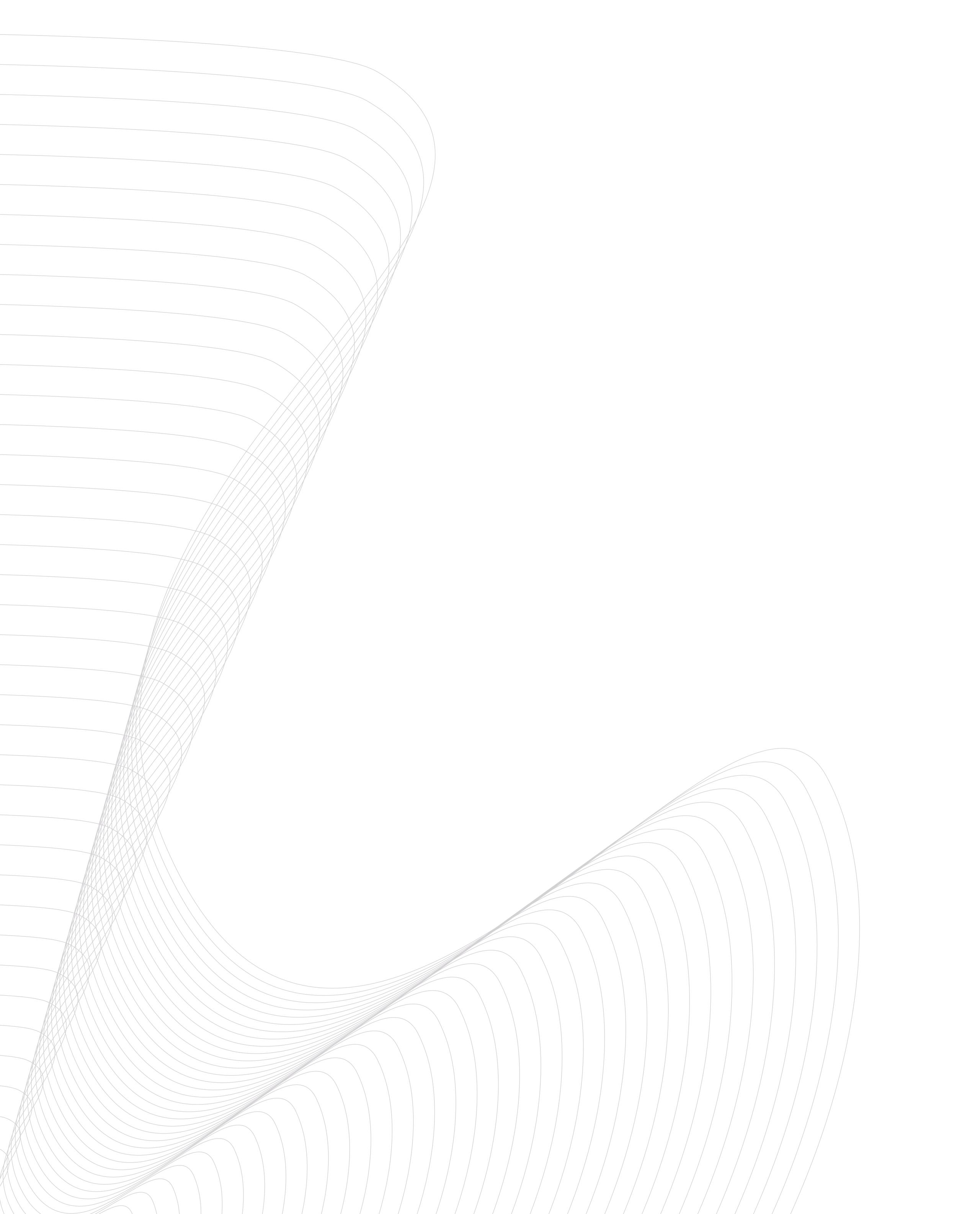
Conclusion

The first vigilance committee will be held at the end of 2022.

The actions in progress are the following:

- of ethics case training in France;
- of the responsible purchasing charter based on the French model;
- mapping.

All the indicators of our vigilance plan are included in our non-financial reporting. These indicators are listed in Annex 2.



• Ethic: reminding employees of the whistleblower process and increasing the rate of completion

Procurement: expansion of the number of suppliers evaluated by Ecovadis, implementation of improvement plans with our suppliers following the Ecovadis evaluation and wider deployment

• Human rights: carrying out targeted audits on the inherent risk points identified in the risk



Annex 1 – Detail of exposure of our geographies by type of inherent risk

This inherent risk mapping is based on external documentation (reports from various agencies and non-governmental organizations), compiled by an external consultancy. The risks related to the countries where we operate are presented here, without taking into account any actions implemented by Loxam to reduce them. The rating scale is described on page 9.

	F	ranc	ean	dhi	stor	cal	peri	mete	Pr		IUN			PAD			Ram	iren	t
Country of establishment	France	Belux	Switzerland	Italy	Germany	Moroco	Brazi	Netherlands	Denmark	Spain	Portugal	Colombia	United Kingdom	Ireland	Middle East	Nordic countries	Baltic states	Central Europe	Poland
HUMAN RIGHTS																			
Discrimination																			
Freedom of association																			
Inadequate social benefits																			
Forced labour																			
Child labour																			
Excessive working hours																			
Failure to respect migrant worker rights																			
Inadequate pay																			
Harassment																			
HEALTH & SAFETY																			
Workplace accidents																			
ENVIRONMENT																			
Contribution to climate change																			
Air pollution																			
Water / ground pollution																			
Inadequate waste management																			
(External source)																			

For clarity, the certain countries have been grouped together as follows: Belux: Belgium, Luxembourg / Central Europe: Czech Republic, Slovakia / Baltic States: Estonia, Latvia, Lithuania / Nordic countries: Finland, Norway, Sweden / Middle East: Bahrain, Kuwait, Oman, Qatar, United Arab Emirates, Saudi Arabia

Key: O Low risk O Moderate risk O High risk O Very high risk

Annex 2 – Reporting indicators

Below we set out the indicators associated with the risks identified, and the section of our non-financial performance statement in which the indicator is mentioned.

Risks	Indicators	CSR Report section				
	% of employees on open-ended contracts	Contributing to				
	% of employees covered by an employee survey	Contributing to the development				
	% of employees covered by staff representatives	of our people				
	% of employees under 25					
HUMAN RIGHTS	% of employees over 50					
	% of female employees	Promoting diversity				
	% of female managers					
	% of employees trained in ethics in past 3 years	Guaranteeing ethical and responsible relations				
	Accident frequency rate					
	Accident severity rate	Guaranteeing safety, anytime and anywhere				
μελιτι / сλρετν	% of employees having followed at least one safety training course					
HEALTH / SAFETY	% of equipment with a user manual	Innovating for our clients' safety				
	Number of prevention initiatives held with our clients					
	Number of co-innovation actions conducted with our clients					
	Carbon footprint – Scopes 1 & 2					
	Energy consumption					
	Water consumption	Reducing our direct environmental impact				
ENVIRONMENT	Quantity of waste produced					
	% of hazardous waste recovered					
	Carbon footprint – Scope 3	Offering low-carbon options				
SUPPLIERS	% of suppliers assessed by Ecovadis	Guaranteeing ethical and responsible relations				





Much More than Rental

Immeuble Le Cap – 8 rue Félix Pyat – 92800 Puteaux La Défense www.loxam.com - Tél. : +33 158 440 400





