2024

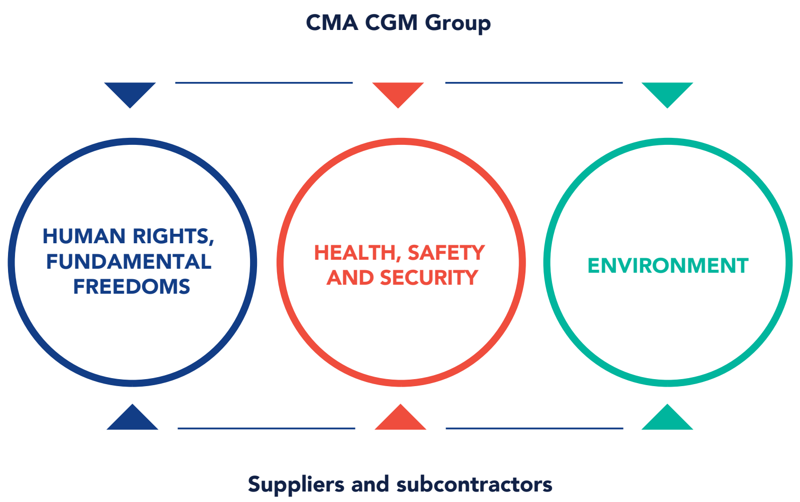
Vigilance plan

CMA CGM GROUP

Contents

Duty of vigilance

Adopted in March 2017, the French law on the Duty of Vigilance introduced a new legal framework requiring companies in scope, such as CMA CGM S.A., to disclose a vigilance plan and to report on the actions that have been implemented in accordance with this plan. Beyond the obligations set out in the law, the Group's goal is to establish a vigilance plan consistent with its ethical, social and environmental commitments.



THE LAW REQUIRES THE IMPLEMENTATION OF FIVE MEASURES:

SCOPE OF APPLICATION AND OVERALL APPROACH

1. VIGILANCE PLAN GOVERNANCE

Taking a cross-functional approach, multiple departments (Risk, Compliance, Purchasing, CSR, Human Resources, QHSE) contribute to implementing the vigilance plan, establishing Group guidelines, and standardizing practices across the various Group subsidiaries:

Such guidelines and alignment of standards are applied in the context of the three subject domains of the Duty of Vigilance law and used to assess and manage risks and impacts within the Group's activities and those of its supply chain.

The complete integration of all activities and subsidiaries in the Group's Duty of vigilance program is in progress, namely due to more recently acquired entities, which will be integrated in due course. The Group's senior management supervises the deployment and implementation of the environmental strategy, with the support of the departments with expertise in the various fields.

Under the supervision of the Group General Counsel and Group Chief Compliance Officer, a team of experts oversees and coordinates the Group program for compliance with the Duty of Vigilance law.

Risks, impacts and initiatives are presented to various committees, including the Responsible Purchasing Committee and the CSR Committee, and at the quarterly meetings of the Audit and Accounts Committee, which reports to the Board of Directors.

2. APPLICATION OF THE DUTY OF VIGILANCE ACROSS THE GROUP

The duty of vigilance applies to the CMA CGM parent company (CMA CGM SA), all subsidiaries, which it directly or indirectly controls (as defined by Article L. 233-16 of the French Commercial Code), and in all sectors of activity of the CMA CGM Group.

The activities covered in this plan include:

- Maritime activities: CMA CGM, ANL, CNC, APL, MERCOSUL LINE, CMA Ships and La Méridionale.
- Inland & Logistics activities: CEVA Logistics, depots used for container storage and maintenance (CCIS), inland transportation of containers and intermodal transportation.
- Airfreight activities (CMA CGM Air Cargo).
- Port & terminal activities (CMA CGM Terminals, Terminal Link).
- Office-based activities: head office, subsidiary offices, and agency network.
- Print media activities (CMA Media, including La Provence – Corse Matin Group and La Tribune. RMC BFM will be integrated starting in 2025).

In addition to the Group's operations, the plan aims at covering the activities of those suppliers and subcontractors with which the Group maintains established commercial relationships.

Information on the CMA CGM Group's relations with external stakeholders is, in addition to where referred to in this plan, available on our Corporate website and in the 2024 Sustainability Report.

3. KEY ACCOMPLISHMENTS IN 2024

In 2024, the Group continued to extend and reinforce its duty of vigilance efforts. Key accomplishments include:

- Launching an update of the duty of vigilance risk map. The aim is to complete the update for all of the Group's divisions by 2025.
- Ongoing monitoring of Quality, Health, Safety and Environment (QHSE) risks, as well as Security risks, covering all activities. A bottom-up approach was used, identifying the main risk scenarios and their associated mitigation plans and Key Risk Indicators.
- Continued work on a Group crisis management framework to prepare and coordinate the actions to be taken in the event a risk occurs.
- The creation of a new human rights policy, which sets out the Group's approach to human rights, including due diligence measures.
- Roll-out of a new Group-wide human rights training program, which raises awareness of the risk of human rights violations in the business context.
- Recruitment of a compliance officer in the Group's logistics division with responsibility for human rights.
- Strengthening of the due diligence, which CMA CGM conducts on its suppliers and sub-contractors through its third party assessment software, rolled out as part of the Group's Sustainable Procurement program.
- The creation of a Group Responsible Purchasing Committee. This committee brings together the persons responsible for the main purchasing areas to discuss responsible purchasing issues, such as supplier evaluations, payment deadlines, calculation of Scope 3 CO_2 emissions associated with the purchase of goods and services, and regulatory developments. This committee

provides a forum for the various purchasing teams to exchange views and best practices and discuss the results of the risk map and cross-functional action plans.
- Carrying out a living wage gap analysis study concerning employees worldwide.
- Conducting an awareness-raising campaign ("Speak Up") to remind staff of their duty to report any ethical and compliance breaches (including in the field of human rights and the environment) they may discover in a business context. This campaign also covered the Group's whistleblowing system – the Ethics and Compliance Helpline.

MEASURE 1: RISK MAPPING

In 2024, the Group launched a project to update its risk map in accordance with its duty of vigilance. The aim is to complete this update for all the Group's activities by 2025 in order to obtain a centralized, comprehensive and operational analysis of all risks the Group is required to manage under its duty of vigilance obligations. The results of this mapping, based on industry analyses, internal documents and consultations with various stakeholders, will be incorporated into our 2025 Vigilance Plan.

This project builds on existing and regularly updated risk assessments, such as those focusing on QHSE, security, purchasing and human rights, thus enabling specific risks to be monitored.

In connection with this project, our methodology is harmonized with CSRD requirements, in particular by revising the severity matrix used to assess the impact of identified risks across the Group. It incorporates factors such as the scale, scope and irreversibility of impacts, in accordance with CSRD standards and assessment criteria based on the United Nations Guiding Principles on Business and Human Rights.

Moreover, at the end of 2023, a Human Rights Impact Assessment commissioned by the Group established the most salient human rights risks related to its own activities and the activities of its supply chain. The "gross" risk results (before considering what measures the Group was already taking to manage the risks, how closely it was connected to them causally or how much leverage it had to influence them) were (in descending order of salience) as follows:

- For the Group's own activities: 1) Occupational Health & Safety, 2) Working Hours, 3) Grievance Mechanism and Access to Remedy, 4) Discrimination and Equal Opportunities, 5) Workplace Violence and Harassment, 6) Wages and Benefits, 7) Health & Livelihood of Local Communities, 8) Freedom of Association and Collective Bargaining, 9) Forced Labour and Human Trafficking and 10) Land Acquisition and Indigenous Rights.
- For the activities of its supply chain: 1) Occupational Health and Safety, 2) Working Hours, 3) Grievance Mechanism and Access to Remedy, 4) Discrimination and Equal Opportunities, 5) Wages and Benefits, 6) Workplace Violence and Harassment, 7) Health and Livelihood of Local Communities, 8) Freedom of Association and Collective Bargaining and 9) Forced Labor and Human Trafficking.

The CMA CGM Group has management tools in place to address most of the main adverse human rights impacts applicable to its own operations in particular in relation to:
(i) Safety (e.g., evolution of polices and processes towards more advanced safety strategies based on "safety culture" and leadership behaviours, and shipbuilding yards being subject to health & safety conditions (verified through on-site audits);
(ii) Working Hours (e.g., digital recording of seafarers' hours of work and rest); and
(iii) Grievance Mechanism (e.g., a dedicated and directly accessible HR function and grievance mechanism for seafarers, enabling closer monitoring and targeted remedial actions and the creation of a Group HR Compliance team to coordinate the handling of ethical whistleblowing).

MEASURE 2: ASSESSMENT PROCEDURES

Along with risk mapping, CMA CGM defines procedures for the regular assessment of subsidiaries and of subcontractors and suppliers with which CMA CGM has an established commercial relationship, to identify and find solutions to risks and impacts. Below is a list of the main duty of vigilance assessment procedures.

1. EXTRA-FINANCIAL RATINGS

At the end of 2019, the Group joined the United Nations Global Compact whose nine out of the ten principles are directly related to the Duty of Vigilance law.

Every year, the Group is assessed by the sustainability ratings agency EcoVadis. In 2024, the Group scored 75/100, placing it in the top 3% of companies with the best ratings. This rating demonstrates CMA CGM's commitment to CSR and covers actions over 4 EcoVadis themes echoing the scope of the duty of vigilance.

EcoVadis performs an additional analysis using a multitude of data from over 100,000 sources coming from external stakeholders (media, governments, trade unions, NGOs, and business networks). The aim is to collect positive and negative information on companies' performance regarding labor, the environment and sustainable procurement. If a case is significant – for instance involving a fine, sanction or conviction – the score for each theme is negatively impacted. Should the Group be subject to sanctions for matters covered by the duty of vigilance, a corrective action plan including reviewing and updating this plan as necessary would be taken.

2. ASSESSMENT FOR CERTIFICATIONS

To ensure appropriate risk management, the Group implements several assessment procedures under international certification standards such as ISO 9001 (quality), ISO 14001 (environment), and ISO 45001 (health & safety) & SMC (Safety Management Certificate) for its activities.

- Maritime activities: 100% of the maritime activities are ISO 9001 and ISO 14001 certified.
- Ports and terminals: 68% of the ports and terminals are ISO 9001 certified, 58% are ISO 14001 certified and 61% are ISO 45001 certified.
- Inland and CEVA Logistics: CEVA Logistics' infrastructure is 88% ISO 9001, 69% ISO 14001 and 62% ISO 45001 certified. Continental Rail is ISO 9001 and ISO 45001 certified. 79% of CCIS's warehouses are ISO 9001, ISO 14001- and ISO 45001-certified.

Audits as part of the certification renewals are used to identify the highest risks from a CSR point of view and to prioritize the Group's corrective actions.

In October 2024, CMA CGM renewed its Green Marine Europe certification. This environmental certification for the shipping industry provides us with a detailed framework to measure and reduce the environmental impact of our maritime activities. CMA CGM Group publishes its results and also participates in working groups that focus on evolving the relevant indicators.

3. INTERNAL AUDITS

In 2024, 80 assignments in 52 countries were conducted by the Group Internal Audit department to check compliance with rules applicable within the company. Group Internal Audit also checks whether organizational and operational provisions have been established, disseminated, understood, and applied, identifies areas for improvement and issues recommendations. Depending on scopes covered by the audits, one or more dimensions of the Duty of Vigilance law can be examined.

For example, CMA SHIPS conducts internal audits and entrusts external audits of the QHSE of its vessels to a third-party organization, standardized according to a list of check points. In addition to these audits, CMA Ships assesses the condition of each vessel on a weekly basis and reports the results to Management.

4. RISK ASSESSMENT OF SUPPLIERS AND SUBCONTRACTORS

Regulatory requirements relating to France's law on Anti-bribery (n° 2016-1691, also called "Sapin II" law), and the Duty of Vigilance law have been taken into consideration in the following processes.

In 2021, the CMA CGM Group launched the ***Accelerate*** program with the aim of speeding up supplier assessments and fortifying risk management. The assessment covers financial aspects, corruption, economic sanctions, and CSR issues. In 2024, 67% of suppliers to the maritime activity have been assessed.

In 2023, the Group strengthened its supplier and subcontractor qualification system, in particular by entering into contracts with data publishers to better identify supplier risks over the entire term of their contracts. Controversy detection tools enable us to monitor news about our suppliers and subcontractors. The CSR assessment process is based on a predictive risk score, which takes into account the company's business sector, geographical area and size, as well as information provided by the supplier or subcontractor. In the event of a confirmed risk, an action plan is established, which may provide for suspending the business relationship if the risk is deemed excessive. Thanks to this process, the Group as reinforced and upgraded its ability to detect non-compliant suppliers/ subcontractors.

In order to better control supplier risks and share best practices, the CMA CGM Group has created a responsible purchasing policy, "The Way to Buy", which applies to all Group entities involved in any aspect of the purchasing and supplier selection processes. This policy recommends, for example, that CSR criteria be taken into account when launching calls for tender.

The Group has also set up a specific governance structure bringing together all stakeholders (Risk, Procurement, CSR, Finance, Compliance, etc.) in order to assist buyers in implementing corrective actions, as well as to decide on whether to continue to do business with the suppliers most at risk.

5. KNOW YOUR CUSTOMER (KYC)

The Group's vigilance extends to its customers and includes a Know Your Customer (KYC) component.

This vigilance includes a feature, which has been added to its shipping information system that triggers alerts on certain customers who, according to our own or public information, may be linked to an incident (smuggling, counterfeiting, bankruptcy, violation of anti-terrorism laws, human rights violations, failure to declare dangerous cargo, misreporting protected species, etc.).

The different levels of risk monitored can be categorized as sensitive, highly sensitive or critical. The alerts draw the attention of our employees at the booking stage so that they are more vigilant, for example if a false declaration was previously made concerning a shipment. For each level of risk, employees must request authorization from the relevant department before accepting the booking. The booking will not be authorized for the highest risk levels.

6. KNOW YOUR PARTNER (KYP)

The CMA CGM Group applies a Know Your Partner (KYP) procedure to assess the risks associated with its business partners (other than customers, suppliers and sub-contractors) on Duty of Vigilance subjects in the areas of money laundering, bribery, fraud, conflicts of interest, human trafficking and other illegal activities.

Risks detected are classified at different levels, thus enabling the relevant teams to make informed decisions and apply the appropriate controls according to the level of risk detected. Documents and answers obtained in connection with this KYP procedure are archived to ensure traceability and compliance with the laws in force.

7. STAKEHOLDER RELATIONS

To promote sustainable development, the CMA CGM Group participates in various cooperative working groups, such as those of the United Nations Global Compact, the Clean Cargo Working Group, the Maritime Anti-Corruption Network, the Container Ships Safety Program, the associations of the Baltic and International Maritime Council (BIMCO) and the World Shipping Council (WSC), the Cargo Incident Notification System and the Business Action to Stop Counterfeiting and Piracy initiative. CEVA Logistics is also a founding member of the Sustainable Air Freight Alliance (SAFA). The purpose of these intercompany working groups and organizations is to foster dialogue and share best practices for continuous improvement at both strategic and operational levels.

CEVA is also a member of the Smart Freight Center collaborative initiative, which was created to support the decarbonization of the transportation value chain.

In 2024, representatives from CMA CGM and CEVA also took part in a roundtable with companies from different industries, which explored best practices for complying with human rights standards in the road transportation industry.

MEASURE 3: SUITABLE ACTIONS

An action plan is defined for each activity and risk category. The following items 1-3 are updated on an annual basis and set out below each of them is a selection of actions taken:

1. ACTIONS TO ADDRESS HEALTH AND SAFETY RISKS

The Group rigorously manages its potentially high-risk activities and promotes a robust safety and security culture. Objectives and key measures in terms of health and safety within our and our subsidiaries' operations are presented in the Sustainability Report 2024 (Chapter 4 and 5).

Strengthening the safety culture

To reinforce its safety culture, the CMA CGM Group has launched a "Safety Vision" program. Our Safety Vision is based on three fundamental focus areas:

I THINK about the equipment, the procedures and task, main risks, main concerns.
I TALK and listen respectfully to ensure a safe workplace, to prevent dangerous situations and to share concerns.
I ACT safely all the time to embody and promote exemplary behaviors. Any such action encourages others to adopt or maintain high level skills.

It is the concrete and communicative translation of the internal safety policy, which is addressed to all hierarchical levels and in all scopes of activity concerned (CMA TERMINALS, TERMINAL LINK, CCIS, CMA CGM, CMA CGM AIR CARGO, CMA SHIPS, APL, ANL, CNC, MERCOSUL LINE and La Méridionale). To promote this vision, workshops and awareness-raising are carried out at all levels and the project will continue to grow in the coming years.

To reduce health and safety risks for our employees, the Group has adopted a Safety Improvement Plan, which focuses on six areas:

1. Individual assessment of officers' level of awareness of safety at work;
2. Training in safety culture for shore-based staff involved in maritime activities and senior ships' officers, by recognized industrial safety players (Leadership in Safety).
3. On board safety training by working on behaviors using digital tools available on each seafarer's phones or tablets. SAYFR, for example, is a mobile application that provides an entertaining way of putting into practice the best safety practices within the Group.
4. Bridge Resource Management (BRM) training, which facilitates communication aboard ships to prevent accidents.
5. Training in on-board firefighting provided to maritime staff by external companies, who issue mission reports containing proposals for improvements. These reports are translated into action plans that are regularly monitored.
6. Increasing awareness of safety issues by sharing real-life cases on a weekly basis - *Weekly QSSE Focus*.

In addition to these measures, the Group has been providing "Leadership in Safety" training for QHSE managers involved in maritime activities and seniors officers. This training is also offered to QHSE managers involved in the land-based side of the business and managers of land-based sites (terminals). This training focuses on managerial actions and tools to be applied to encourage the implementation of a safety culture at each site.

Health & Safety culture at CEVA Logistics

CEVA Logistics' QHSE focus includes all dimensions, sectors, and countries in which CEVA Logistics operates. All workplaces comply with all applicable occupational health and safety laws, as well as internal and external standards. Employees and subcontractors are expected to observe these laws and standards when performing their day-to-day tasks.

CEVA Logistics has developed a three-stage roadmap to improve its HSE performance:

- Setting up a governance structure with consistent standards and accurate performance measurement;
- Improving safety skills through hybrid training programs;
- Developing safe behavior and habits, and showing how each employee can take action.

CEVA Logistics continues to improve its reporting capabilities through the use of digital solutions, with ambitious metrics, KPI dashboards and a particular focus on trends in the logistics industry.

CEVA Logistics endeavors to continuously improve the well-being of its employees. These efforts include a partnership with a health insurance network, which is the product of close collaboration between the HR and Health & Safety departments. This allows regional offices to provide a variety of preventative-type services.

Regarding suppliers/sub-contractors, the Group's Third-Party Code of Conduct, which suppliers/subcontractors are required to sign, includes a clause requiring compliance with local regulations on health, safety, and the environment as well as the implementation of adequate management systems. Depending on the type of products or services purchased, contracts include clauses dealing with specific CSR risks.

Managing risks associated with accidents

Health and safety risk management is a continuous improvement process at CMA CGM Group. This process is based on robust safety systems, certifications and monitoring tools, and focuses on deploying a safety culture. It involves all actors from the management to the seafarers and operational staff daily, under the guidance of the Accident Prevention Committee (APC). This committee is responsible for providing feedback on accident investigations and developing prevention strategies to improve safety levels. For the CMA CGM scope, there are dedicated QSSE teams for the following activities: marine, cargo, terminals, inland.

CMA CGM has set up incident investigation procedures that are subject to continuous improvement. They cover: behavioral analysis, feedback, training, e-learning, best practice and awareness campaigns

Every accident is investigated in detail on site. Improvement plans and protective measures are then circulated and implemented within teams.

In 2024, there were no fatal accidents among Group employees.

To prevent risks in its maritime business, CMA CGM follows the most stringent standards, such as those of the Oil Companies International Marine Forum and the Marine Injury Reporting Guidelines. Information regarding on-board accidents is collected, analyzed, investigated if necessary, and shared with all teams. This enables measuring the effectiveness of the systems in place, facilitates comparison of safety performance with other shipping companies, and enables coordinating practices and policies.

FOCUS ON
the security of employees

The Group Security department ensures the security of staff worldwide, on land, at sea and in the air. It adopts preventive measures, develops security analyses, procedures and measures, and provides ongoing support, particularly in emergencies.

On land, the Group deploys an approach to prevent and manage three types of major risk:

- security risks due to factors such as geopolitics and crime;
- health risks, such as pandemics or medical evacuations;
- natural and industrial hazards, such as earthquakes, cyclones, tornadoes, typhoons and floods.

At sea, the Group's security approach is designed to prevent two major risks:

- piracy and terrorism at sea;
- trafficking: drugs, weapons, counterfeit goods, illegal cigarettes, endangered species.

The Group ensures the security of its employees on business trips. CMA CGM and CEVA Logistics have set up a dedicated platform for the Group's business travelers. It assists travelers in preparing their trips and facilitates rapid intervention by the Group's Central Security Division in the event of an emergency (security event, natural disaster, etc.). In addition, an e-learning program dedicated to travel safety has been developed and distributed to the entire Group. It discusses the full range of good practices to follow before and during a trip abroad.

Internal indicators have also been defined to assess the Group's QHSE performance. They measure the results of the QHSE policy: severity rate, accident frequency rate, number of fatal accidents, etc. An annual target is set for each of the indicators.

At CEVA Logistics, all new employees and subcontractors receive safety training. Sites with over 10 employees have Health, Safety and Environment Committees (HSE). Workplace accidents, illnesses and incidents are systematically investigated, the cause identified, and corrective measures taken to prevent any recurrence.

The CMA CMA Group has made it a priority to centralize the management of emergency situations to ensure an adequate response and immediate reactivity adapted to each situation.

This approach is aligned with the Group's risk mapping.

Preventing psychosocial risks

Since 2023, a collaborative approach has been initiated in France to promote the prevention of psychosocial risks at the head office. This initiative led to an overhaul of the method for updating the Workplace Risks Assessment Document (DUERP). This has enabled CMA CGM in France to identify the psychosocial risks to which its teams are exposed, and to deploy targeted, long-term preventive measures tailored to actual conditions on the ground. This project involved around 100 ambassadors from the teams and Management. This approach enabled us to analyze all relevant issues in depth. In this way, the Group has laid the foundations for proactive, long-term management of occupational risks.

In 2024, CMA CGM confirmed the importance it places on mental health by creating a position dedicated to preventing psychosocial risks. In addition, the Group set up a series of training programs focusing on preventing psychosocial risks.

The Group supports seafarers through improved management of time spent on-board, workload analysis, exchanges between shore staff and seafarers, and monitoring and alert procedures concerning psychosocial risks. Teams on board have resources available to them to help manage psychosocial risks including:

- Multilingual psychological assistance and contact with an occupational psychologist;
- A psychosocial risks officer, in the case of French seafarers;
- A complaints system managed by Group experts; and
- Debriefing after each sailing.

By continuously improving its action plan on psychosocial risks, the Group is reaffirming its commitment to the mental health of its employees, while reinforcing its ethical, inclusive and protective working environment.

Combating illicit trafficking

The Group has made reinforcing its resources to combat illicit trafficking a priority. This fight focuses particularly on drugs, weapons, protected species and counterfeit goods. In 2024, CMA CGM strengthened its prevention capabilities to avoid contamination of its containers by these types of illegal trafficking. These actions also extend to the various stakeholders involved in the Group's logistics activities.

Regular meetings with the customs authorities of the countries in which the Group operates are key steps. These strengthen cooperation and enable combating illicit trafficking more effectively.

New tools and procedures are constantly being developed, and the Group cooperates fully with the competent authorities in France and internationally.

To support its commitments, the Group is a member of the Baltic and International Maritime Council (BIMCO). This association facilitates the business operations of its members by drafting standardized contracts and contractual clauses.

CMA CGM's Central Security Department also coordinates a working group within the World Shipping Council (WSC), the *Custom Interface Working Group*. It is the voice of the maritime transport industry with respect to preventing illicit trafficking vis-à-vis policy makers and other industry groups with an interest in international transport.

2. ACTIONS TO REDUCE THE RISK OF VIOLATIONS OF HUMAN RIGHTS AND FUNDAMENTAL FREEDOMS

Objectives and key measures in terms of human rights within our and our subsidiaries' operations are presented in the Group's Sustainability Report 2024 (Chapters 4,5 and 6).

CMA CGM Group respects human rights and seeks to offer the best possible working conditions (for example working hours, break time and holidays, wages). The Group guarantees social protection for all its employees in the world.

The Group is committed to respecting internationally recognized human rights in line with the following international standards:

- International Bill of Human Rights (meaning the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights and the International Covenant on Civil and Political Rights).
- ILO Declaration on Fundamental Principles and Rights at Work, and related fundamental conventions;
- Maritime Labour Convention, which sets out fundamental rights including the elimination of discrimination and respect for employees.

As a member of the United Nations Global Compact, the Group also actively supports and promotes the United Nations 2030 Sustainable Development Goals, and each year it submits its Communication on Progress in relation to its commitments.

In line with United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises, the Group conducts human rights due diligence, using a risk-based approach. This approach applies to the Group's operations, as well as those of its value chain. It is based on processes of identifying, preventing, mitigating and remedying adverse risks and impacts.

Acting for human rights

Human rights policy

In 2024, the Group adopted a new human rights policy, which sets out the Group's approach to human rights, including due diligence measures. The policy is available on the Group's website.

The Group also updated its Code of Ethics. This revision reflects our ongoing commitment to reinforcing ethical standards and adopting compliance best practices. The new Code of Ethics provides our employees with guidance regarding the Group's rigorous application of ethical principles and international human rights laws.

Based on the results of the Group's earlier Human Rights Impact Assessment and the updated risk mapping of duty of vigilance risks, which should be finalized by mid-2025, the Group plans to expand its roadmap of measures aimed at strengthening:

- Its procedures for assessing the actual or potential negative impacts of its activities, as well as of the activities of the suppliers and subcontractors with whom the Group has established business relationships;
- Its actions to mitigate the risk of such impacts or to prevent real impacts;
- Its whistleblowing system; and
- The monitoring of the measures implemented as part of its Duty of Vigilance program and of their effectiveness.

Human rights throughout the value chain

Every supplier, subcontractor or business partner is requested to respect internationally recognized human rights standards, as evidenced, for example, by such requirement in the Group's Third-Party Code of Conduct which all suppliers and sub-contractors of the Group are requested to sign up to.

Like the Code of Ethics applicable to employees, CMA CGM's Third-Party Code of Conduct defines the standards, in strict compliance with applicable laws and regulations, required of its third-party contractors including suppliers, sub-contractors and joint venture partners.

In the Third-Party Code of Conduct, CMA CGM requires its business partners, suppliers and subcontractors to respect all internationally recognized human rights and labor standards including those regarding child labor, forced labor and working hours.

The CMA CGM Group performs human rights due diligence checks on suppliers and subcontractors, using third-party ethical compliance assessment software that has recently been deployed under the Group's Sustainable Procurement program. This tool manages and monitors supplier risks and offers reinforced risk assessment throughout the contractual relationship, based on questionnaires, audits and corrective action plans or by the convening of a cross-functional supplier risk committee, depending on the level of risk identified.

Using the Group's knowledge and expertise to encourage better practices in its supply chain is part of its duty of vigilance strategy. In 2024, for example, the Group assisted one of its main suppliers in assessing the impact of its activities on human rights, providing information and constructive feedback.

Combating discrimination

In its Code of Ethics, the Group guarantees the rights of every employee and undertakes to exclude discrimination of any kind, whether based on social or national origin, race, gender, sexual orientation, age, religious belief or political or other opinion. The Group therefore opposes all types of psychological, physical and sexual harassment, and promotes gender equality.

CMA CGM Group has launched several diversity and inclusion initiatives to identify possible forms of discrimination, such as an agreement on gender equality to promote equal career opportunities for men and women. Training and awareness campaigns aim to prevent all types of discrimination.

Actions taken in 2024 included:

- The training of all recruiters and HR actors about prevention of the various forms of discrimination and making them aware of their own biases, thus encouraging diversity, inclusion and parity within the company.
- The training of all managers in France, including top management, about prevention of the various forms of discrimination (especially during the hiring process), coupled with another dedicated training on harassment.
- Providing Group leadership programs that cover the issues of diversity and inclusion. The Group seeks to achieve gender balance, as well as geographical diversity, in all Group entities.
- The training of all the Group's employees via mandatory e-learnings on the prevention of discrimination including an introduction to unconscious bias.

CMA CGM complies with the Maritime Labor Convention (MLC) and the Group's Code of Ethics guarantees employee rights, in particular by prohibiting any form of discrimination (whether due to origin, race, gender, sexual orientation, age, political opinions or religious beliefs). Moreover, the Group opposes all types of harassment and promotes gender equality.

Preventing harassment

In 2024, CMA CGM implemented a specific training plan on identifying and preventing harassment in the workplace for all managers at head office.

Every year, our employees receive training on important issues, including the prevention of harassment. To date, 2,005 employees have received awareness training on these issues.

Several initiatives have been launched for crews aboard vessels:

- Sexual harassment officers have been appointed. They hold a pre-embarkation briefing for women seafarers before each voyage and remain continuously available to discuss concerns in confidence;
- Training against sexual harassment, in the form of e-learning modules, mandatory for all seafarers, is also provided on board;
- A training course for French ship captains on the laws against sexual harassment is delivered by a specialized law firm.

The Group provides training to all its managers in France, including top management, on the prevention of harassment in the workplace.

Encouraging social dialogue

The CMA CGM Group respects the right of its employees to form and join trade unions in all its business areas. Indeed, it is supportive of social dialogue in all of its employee-management bodies in accordance with applicable local rules.

Regular dialogue is held between employee representatives and management. The company offers employees the opportunity to express their views on their working life through regular, anonymous surveys. The results of these surveys are used to guide the company's social policy and action plans to be implemented in various areas such as working conditions, relations with managers and internal communication.

By way of example, in the maritime transportation division, employee representatives and management meet quarterly, or extraordinary meetings are convened in the event of an emergency. A specific committee within the Social and Economic Committee focuses on health, safety and working conditions. It reports on performance indicators related to safety and social issues, and presents actions taken by CMA CGM to improve the working conditions of seafarers. Representatives are also given the right to make onboard ship visits and report problems encountered by seafarers. The work undertaken with representatives concerning French seafarers serves as a basis for the teams to disseminate good practices and actions internationally. Major actions have been initiated following consultations with seafarers, such as refurbishing living spaces, providing sports equipment, and establishing a nutritional plan program.

Monitoring and managing working time

The CMA CGM Group has put in place policies and entered into collective bargaining agreements to proactively manage risks in connection with working time and overtime. For example:

- In 2024, a new agreement on workplace gender equality and quality of working life was negotiated for the period 2025-2028. In particular, it provides for personalized support and flexible working arrangements for employees facing major life events, thus enabling them to continue working, and also includes specific provisions for future parents within the Group;
- The CMA CGM Group has set up a system for recording, measuring and verifying working hours. In addition, at the head office, management monitors the total number of overtime hours on a monthly basis and presents the figures to the Social and Economic Committee;
- CMA CGM complies with the provisions of the Maritime Labor Convention of 2006, which sets minimum and maximum working hours and rest periods for seafarers.

Through its Third-Party Code of Conduct, the Group requires each of its business partners to ensure that its employees work in compliance with all applicable laws, mandatory standards and relevant collective bargaining agreements concerning the number of working hours and days, including overtime, breaks and rest periods.

Promoting a competitive remuneration

CMA CGM Group ensures that each employee is compensated in a fair, non-discriminatory and competitive manner. The Group has added a new focus to its compensation positioning to promote fairer wages and decent living conditions.

In 2023, CEVA Logistics launched a living wage pilot project with the Fair Wage Network. Seven countries were selected: Uganda, Saudi Arabia, South Africa, Poland, the UK, Ireland and Singapore, all of which successfully received Fair Wage Network certification. Following on from the success of this pilot program, an additional 32 countries were completing the certification process in 2024. By the end of 2030, CEVA Logistics targets obtaining certification in 75% of the countries where it does business.

3. ACTIONS TAKEN ON ENVIRONMENTAL RISKS

Objectives and key measures in terms of the environment within our and our subsidiaries' operations are presented in the Sustainability Report 2024 (Chapter 1 to 3).

Fighting climate change

To limit global warming and reach its 2050 goal of reaching net zero, CMA CGM has been deploying and exploring innovative climate-friendly solutions in 2 areas:

1. Reducing energy consumption by pursuing operational excellence and optimizing designs and assets:
To reduce its energy consumption and its environmental impact, the Group is focusing on pursuing operational excellence and modernizing its assets. Several departments are working together to deploy new technologies and implement initiatives to decarbonize maritime, inland and air transport, whether carried out in-house or outsourced. Several actions have been implemented within the terminals and depots of our intermodal transport activity to reduce its environmental impact. If the sites allow, photovoltaic panels are installed so that they are supplied with green electricity.

The Group has been strengthening and structuring its R&D and innovation policy, equipping itself with scientific and human resources and industrial, academic and start-up partners (e.g., the ZEBOX incubator).

In 2024, with the support of the R&D and Data Science IT departments, CMA CGM stepped up the development and implementation of new tools. These tools help to reduce fuel consumption and thus the carbon impact of ship voyages.

CEVA Logistics invests in innovative solutions to optimize its operational performance and reduce its environmental footprint. In particular, CEVA Logistics works on intelligent routing, quantity forecasting and capacity modeling software, in order to optimize truck fill rates and reduce the number of deliveries.

CEVA Logistics optimizes its activities with subcontractors and acts to reduce CO2 emissions. In their responses to calls for tender for goods transportation services, subcontractors are asked to describe the environmental performance of their fleets and their actions to promote sustainable development.

2. Diversification and decarbonization of the energy mix through the development of alternative low-carbon fuels: liquefied natural gas (LNG), biomethane, e-methane, biofuels, methanol, and hydrogen.

Improving air and water quality

CMA CGM Group is committed to reducing its CO_2 emissions and endeavours to reduce pollutant emissions from combustion of traditional fuels: sulphur oxides (SOx), nitrogen oxides (NOx) and fine particles (FPs). Air quality is a major public health issue and a priority for seafarers, terminal workers and the inhabitants of port cities. The CMA CGM Group is committed to a process of continuously reducing atmospheric pollutant emissions by developing new technologies and diversifying its energy mix.

The Group has opted for hybrid flue gas treatment systems (scrubbers). These systems can operate in a closed loop circuit and are beneficial for vessels that use fuel with a sulfur content exceeding 0.5%. They capture the majority of sulfur, hydrocarbons and nitrogen oxide residues. The residues are then processed in shore-based facilities. 116 vessels are equipped with hybrid scrubbers (69 owned and 47 chartered vessels), accounting for 17% of the fleet.

To prevent accidental discharges at sea and, in particular, oil pollution from the Group's ships or terminals, CMA CGM deploys several measures: fleet maintenance, regular simulations and exercises, and an emergency

FOCUS ON
the "zero loss of containers" target

The Group has made "zero loss of containers" a strategic priority. Containers may be lost at sea due to bad weather, exceptional incidents or erroneous declarations of cargo. This year, the geopolitical context made sailing conditions particularly difficult due to the need to travel around the Cape of Good Hope. This led to the loss of 168 containers at sea in 2024.

The CMA CGM Group continues to follow best practices and strengthen its procedures by optimizing its parametric roll detection tool, through extended weather monitoring, by taking advantage of the resources of our fleet navigation centers, through optimized weather routing and by using our on-board container security system.

At the same time, CMA CGM actively collaborates with shipowners' associations and competent bodies to standardize methods and, through concerted initiatives, to collectively reduce the risk of losing containers at sea.

Finally, CMA CGM supports the IMO's position in favor of properly labeling containers so they can be easily identified, thus encouraging the entire logistics chain to commit to more responsible management. Aware of the environmental problems this generates, the Group acts proactively and voluntarily and systematically loads plastic pellet containers in the hold to avoid any risk of losing these containers in the event of an incident.

management process. 70 vessels in our fleet are also equipped with a Fast Oil Recovery System: FORS. In the event of a grounding or collision, this system enables oil to be pumped out quickly and prevents any pollution.

To decarbonize the road transportation it operates or subcontracts, CEVA Logistics relies heavily on technology and contributes to the evolution of infrastructure. Its transportation of finished vehicles division has converted its entire fleet of long-haul car carriers to the Euro VI standard 10, which imposes emission limit values for nitrogen oxides (NOx), carbon monoxide (CO), hydrocarbons (HC) and particulate matter.

CEVA Logistics is also investing in electric trucks to reduce the emissions of its supply chain. The company has conducted several pilot projects to electrify its fleet in various regions.

Protecting the environment and biodiversity

Since 2013, CMA CGM has been certified ISO 14001 and conducts an assessment of its impacts on the environment and biodiversity in order to target actions and maximize their effects on biodiversity hotspots:

- Ocean Stewardship Coalition - UNGC - Signature of the "Sustainable Ocean Principles" in 2022 for the UN Ocean Conference in Lisbon.
- Surf Rider Foundation "Green Marine Europe" label - certified annually since 2022.

Focusing on biodiversity, the Group acts around four pillars:

1) Measuring impacts
- In 2024, the Group launched a pilot project to measure the biodiversity footprint of Malta Freeport Terminal. This assessment will provide a better understanding of the impact of CMA CGM's operations on the local ecosystem and marine biodiversity, and will identify avenues for action to make a positive contribution to biodiversity conservation.
- For its part, CEVA Logistics is working on an ecological database of the land footprint of its sites. CEVA Logistics' goal is to reduce the environmental impact of its logistics activities on the fauna, flora and natural resources of its sites with high biodiversity risks. Over 40 sites worldwide have already deployed local action plans.

2) Reducing the impact of its activities
- The Group's procedures for transporting protected species were reinforced in 2020. CMA CGM's internal training Academy provides all its commercial agents, including new entrants, with training on the illegal transportation of protected species, designed with CITES and UNODC (United Nations Office on Drugs and Crime).
- Speed reduction (10 knots) - East and West coasts US and Canada (Green Flag Program).
- Since 2021, CMA CGM's Fleet Center has used the Whale Safe app, in partnership with the Marine Mammal Center and the Benioff Ocean Initiative. Alerts are automatically sent to ships, thus reducing the risk of collisions on the west coast of the United States.

FOCUS ON
the Group's projects to protect biodiversity

CPR Plankton (Continuous Plankton Recorder) is an oceanographic survey operated by the Marine Biological Association based on plankton sampling. CMA CGM Group made its vessels available to deploy the CPR's instrument and collect plankton samples during the crossing of several ships, from March 2018 to July 2023. In 2024, the Group renewed this commitment and deployed the system on the CMA CGM ENDURANCE.

Lora Antennas with IFREMER: set up a global marine biodiversity observation network that is open and free to the international scientific community. This network, based on Internet of Things (IoT) technology, will make it possible to transmit data collected by various platforms at sea (thanks to beacons placed on marine animals) in order to monitor marine biodiversity and ecosystems. At the same time, CMA CGM draws up a blacklist of exporters suspected of being involved in illicit trafficking. Preventive measures can include suspension of certain exports such as timber from Gambia, which contributes to deforestation in West Africa.

Whale Safe: Whale Safe is a technology-based mapping and analysis tool displaying whale and ship data for the Santa Barbara Channel, with the goal of helping to prevent fatal ship collisions with whales. Throughout our fleet center, the application, deployed since April 2021 in a collaborative way with the UC Santa Barbara, automatically alerts our vessels to the risk of collision with cetaceans on the West Coast of the United States. These alerts allow ships to adapt their speed or sea route to limit the risk of collision. In 2024, this app was deployed on the east coast of the United States and Canada in collaboration with Woods Hole.

Partnership with Adelaide University to combat the illegal trade in wildlife: this partnership seeks to identify the international shipping routes most at risk for wildlife trafficking and to take advantage of innovative techniques, such as the development of a tool and a pilot project for non-invasive screening (through air sampling) of the types of species being transported.

Life-PIAQUO, which aims to reduce the impact of maritime noise on marine ecosystems: this consortium, consisting of major players in the maritime industry and European research, develops and tests equipment to reduce the noise of maritime traffic and its impact on marine biodiversity. In addition, since 2023, the Group also collaborates with the Enhancing Cetacean Habitat and Observation (ECHO) program of the Port of Vancouver, Canada, in evaluating the acoustic signature of its ships.

- Since July 2023, the Group has diverted its vessels in the Hellenic Trench to reduce the risk of collision with sperm whales.
- Ships are equipped with water tanks, which may contain microorganisms that may become invasive species in another ecosystem. Since 2015, ships' ballast water has been sterilized by UV radiation. This solution is preferable to the addition of chemical substances as it does not impact local biodiversity. Currently, 100% of the fleet is equipped with this system.

3) Preserving and restoring fragile ecosystems:
The Group's actions and commitments go beyond reducing the impact of its maritime and shore-based activities. The Group supports research and initiatives to preserve and restore biodiversity:

- In 2024, CMA CGM renewed its partnership agreement with Fondation de la Mer to restore Posidonia meadows in France, Malta, Greece and Turkey.
- In 2021, the Group took action to respond to the environmental emergency created by the forest fires in the Var region of France in August 2021. The Group donated €1 million to support the Massif des Maures Restoration Plan. In 2022, the Group extended its partnership with the "Action for Forests Fund" of the French National Forests Office (ONF), pledging €3 million over the next three years.

4) Supporting research and innovation:
Aware that we cannot act alone, CMA CGM Group relies on the knowledge and expertise of scientific partners and NGOs. For sustainable use of the ocean, it has scientific partners such as **Woods Hole and Ifremer**.

Promoting the circularity of waste

The Group's actions focus on optimizing its water management, reducing wastage of resources – based on life-cycle analyses – and reducing the volume of packaging and waste. Shore-based activities, such as washing handling equipment and containers, account for the greatest water consumption at CCIS terminals and depots. The Group has monitored the water consumption of these activities since 2022, enabling it to meet its target of reducing consumption by 30% by 2030. In addition to water management measures, the Group monitors hazardous and non-hazardous waste at CCIS terminals and depots.

Since June 2022, the CMA CGM Group no longer transports plastic waste to destinations where it cannot be sorted, recycled or recovered.

Packaging is unavoidable in the logistics business. CEVA Logistics reduces its impact, from new packaging to disposal, via reusable packaging options, by using less harmful materials, through waste separation and sorting, and by various waste reduction or reuse solutions.

FOCUS ON *ship dismantling*

Anticipating the impending entry into force of the Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships, since 2008 the Group has inventoried hazardous materials on board its owned ships.

When ships must be decommissioned, the Group sends them to dismantling yards that are systematically audited and that comply with international and local health, safety and environmental standards. The Group adheres to the list of shipyards approved by the European Commission for all its ships that have sailed under a European flag. For other flagged ships, in 2024, the Group expanded the audits of international shipyards to ensure they comply with the most recent international regulations, and prepared a shortlist of partners selected on the basis of clear criteria. In 2024, no vessels were dismantled.

In 2024, the Group renewed its membership of the Ship Recycling Transparency initiative (SRTi) working group, in which participants share best practices and new advances in the dismantling sector.

MEASURE 4: WHISTLEBLOWING SYSTEM

As enshrined in our Code of Ethics, the Group encourages a culture of speaking up to report good faith concerns about any suspected or actual violations of laws, regulations or our Group Code of Ethics. All the Group's internal and external stakeholders (employees, customers, suppliers, subcontractors, non-profit associations, trade unions, etc.) are invited to submit reports via the Group's whistleblowing system, the Ethics and Compliance Helpline, which can be accessed on the Group's website or intranet. The whistleblowing system is also deployed within its subsidiaries.

The Ethics and Compliance Helpline allows people to:

- Ask the Compliance department questions.
- Submit a report using an online form or by calling a dedicated phone number (listed per country and available on the Group's website or the intranet).
- Remain anonymous if the reporter so desires and if local regulations so allow.
- Access a 24/7 platform.

The Ethics and Compliance Helpline may be used to report:

- Fraud, theft and/or corruption.
- Anti-competition practices.
- Human resources issues (e.g. harassment, discrimination or violence).

- Human rights violations.
- Damage to the environment and risks to personal health and safety.
- More generally, any potential breach of the Group's Code of Ethics or policies.

The Ethics and Compliance Helpline is available in several languages and is open to all CMA CGM employees and to third parties, including suppliers and subcontractors. The system concerns all Group activities, both maritime and shore based.

A small team of experts in the Group Compliance department receives the alert, analyzes its admissibility and the nature of the reported facts, and assigns the case to a competent investigator. The CMA CGM Group "Investigations Guidelines" have been drawn up to provide investigators with best practices when conducting investigations. They define the responsibilities and describe the tasks of the investigators. All investigators are required to be fair and objective when conducting investigations.

All information provided must be kept confidential in accordance with the law and company policy. Furthermore, in accordance with its non-retaliation policy, the CMA CGM Group undertakes to protect anyone who, in good faith, reports a potential or actual breach of the law or of internal policies, from any form of reprisal. These reporters will not suffer adverse professional or other consequences. Managers must take appropriate measures to handle reports in a confidential manner and to safeguard employees from any form of retaliation. Failure to comply with this policy will result in disciplinary action, up to and including termination of employment.

CMA CGM's non-retaliation policy applies to all CMA CGM Group employees, including employees of CMA CGM subsidiaries and its joint ventures over which the company has management control. It also applies to non-employees.

Within its Third-Party Code of Conduct, CMA CGM requires its business partners, suppliers and subcontractors to report any observed or suspected violation, including by a CMA CGM member of staff, throughout the course of the business relationship with CMA CGM.

The use of the CMA CGM Group's Ethics & Compliance Helpline is promoted in annual e-learnings, which are mandatory for all employees.

Under its on-board health and safety policy for ships, the Group is committed to providing support to seafarers, in particular through monitoring and reporting procedures relating to the management of psychosocial risks and conditions on board. Teams on board ships have various tools at their disposal to manage and monitor problems on board:

- A procedure for recording and investigating reports of harassment or intimidation. Reports can be sent directly by seafarers to the email address of the Reports Analysis Team. Reports are tracked by nationality and by category and their status is reported on in each periodic report.
- A procedure and awareness campaign have been implemented since 2022 as part of the psychological risk prevention system.
- A hotline and psychological assistance are available for all seafarers.
- Seafarers can also contact a psychosocial risk advisor to guide and support them in risky situations.

MEASURE 5: SYSTEM FOR MONITORING MEASURES IMPLEMENTED AND EVALUATING THEIR EFFECTIVENESS

Measures are monitored and their effectiveness assessed by the various departments responsible for their implementation.

A set of CSR Key Performance Indicators has been defined, all with targets monitored quarterly by the executive committee, whose members are responsible for reaching the targets set.

Qualitative and quantitative data are consolidated quarterly by the CSR department and presented in the annual Sustainability Report. The accuracy of Key Performance Indicators is audited annually by an external third-party.

The Key Performance Indicators monitored in connection with the Duty of Vigilance law are presented in the tables below.

Based on the forthcoming results of the updated risk mapping exercise in connection with the Duty of Vigilance law, CMA CGM intends to further develop its systems to monitor measures implemented to manage risks and negative impacts to health and safety, the environment and human rights, and to evaluate their effectiveness.

INDICATOR	UNIT	SCOPE	2024	2023	2022
Health, safety & security					
Percentage of employees with access to primary health care	%	CMA CGM	98	98	98
		CEVA Logistics	100	100	95
Lost Time Injury Frequency Rate (LTIFR)	Rate	Maritime	1.0	0.8	0.7
		Inland	4.1*	Not Available	Not Available
		Air	5.4	First year of publication	
Number of fatal accidents	Number	Group	0	2	3
Human rights					
Percentage of employees who received mandatory training on ethics and compliance issues	%	Group	86	Not Available	Not Available
Number of alerts received per category	Number	CMA CGM	311	Not Available	Not Available
		CEVA Logistics	702	Not Available	Not Available
Number of nationalities	Number	Group	200	168	175
Average age of employees	Age	Group	40	39	39
Ratio of women to men	%	Group	36/64	37/63	35/65
Share of women in management	%	Group	35	34	32
Share of women on the Board of Directors	%	Group	42	42	42
Environment					
CO_2 emissions Scope 1,2 and 3	Million tons	Group	49	40	39
NOx emissions from maritime fleet fuel consumption	Thousands of tons	Maritime activities	616	553	575
SOx emissions from maritime fleet fuel consumption	Thousands of tons	Maritime activities	76	68	71
Particulate matters emissions related to the maritime fleet fuel consumption	Thousands of tons	Maritime activities	57	51	54
Number of containers lost at sea	Number	Maritime activities	168	4	69
Number of major marine oil pollution incidents	Number	Maritime activities	0	0	0
Solid waste	m^3 per ship	Maritime activities	136	148	144
Oil sludge production	Thousands of tons	Maritime activities	188	186	179
Sustainable procurement					
Suppliers assessed	%	CMA CGM	67	59	Not Available

* Health and safety data for land-based operations include CEVA Logistics, terminals and CCIS depots.

BETTER WAYS