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Declaration of Principles on the Human Rights Strategy within the meaning of Section 6 (2) LkSG

For more than 60 years, Framatome has been a competent partner for power suppliers worldwide with a comprehensive range of solutions and services. Framatome's teams design and deliver nuclear power plant equipment and fuel assemblies, as well as related services.

Framatome's activities are based on 5 cornerstones:

- Design of nuclear power plants
- Design and installation of nuclear steam generator systems
- Development and production of fuel elements and associated components
- Integration of automation systems
- Maintenance and modernization of nuclear power plants of all reactor types

Framatome GmbH is committed to respecting human rights and taking responsibility for its supply chain. We live the values that underlie the Supply Chain Due Diligence Act and internationally recognized human rights standards. Therefore, we take care to prevent human rights violations in the course of our business activities. The sustainable development goals for Framatome include protecting the environment and climate.

The German Supply Chain Due Diligence Act (LkSG) requires companies of a certain size to prevent or minimize legally defined human rights and environmental risks in their supply chains, ideally ending them.

Framatome acts in accordance with its Code of Ethics and the CSR policy of the EDF group

In line with the major CSR guidelines, Framatome takes measures for effective risk management. In accordance with the LkSG, Framatome is committed to the guiding principles for business and human rights of the United Nations and other internationally recognized human rights frameworks and standards.

Framatome strives to be an exemplary company in terms of ethics and compliance. The ethical rules to which Framatome is subject in all circumstances, whether due to external obligations (laws and regulations) or on the basis of its own decision, have been laid down in writing since 2018 in the "Code of Ethics" (Framatome). These rules apply within Framatome´s own business area to the company's employees and, with any necessary adjustments, to direct suppliers and business partners. In addition, Framatome has set values that must be respected by every employee. The company carries out its activities in strict compliance with human rights, as formulated in the Universal Declaration of Human Rights adopted by the United Nations. Responsibility, sincerity and a willingness to engage in open dialogue characterize the actions of Framatome. The company provides accurate and relevant information in reports to enable an objective assessment of its performance in terms of environmental, economic, social and societal responsibility.

With regard to our suppliers and subcontractors, we pursue a sustainable supply chain policy that is the basis for cooperation with our suppliers based on purchasing conditions. By this we mean loyal, fair and objective business relationships characterized by mutual respect.

Framatome refers explicitly to the United Nations Global Compact in its Code of Ethics, follows the OECD guidelines for multinational companies and supports the Extractive Industries Transparency Initiative (EITI). Our Human Rights Policy aims at the strict observance of human rights in our operations and promotes their respect along the supply chains. We encourage and support both our employees and business partners and suppliers to comply with their duty of care and avoid negative effects through the clear commitment with the "Framatome" Code of Ethics. We urge our suppliers in contractual clauses to pass on our human rights requirements to subcontractors.

Risk analysis and management

In order to review the impact of our actions on human rights, we already formulated Framatome's expectations of suppliers and subcontractors in the Code of Ethics in 2018. We ensure that the measures are effectively incorporated into our contracts. Since then, Framatome reserves the right to audit all suppliers with regard to the supply chain to determine whether the requirements are being complied with in the supply chain. This human rights risk analysis is carried out in light of the LkSG IT-supported. The classification of the supplier in a risk class is multi-dimensional, based on criteria that allow conclusions to be drawn about the risk relevant to the LkSG.

The aim of the permanent risk analysis is that the company itself, but especially the business partners along the supply chain, strictly observe human dignity. The risk of contravening the prohibitions of § 2 LkSG is to be minimized by these organizational measures.

Prevention Measures

Framatome's human rights strategy is characterized by a human rights screening of suppliers. Value is also attached to meaningful certificates such as ISO certifications that Framatome itself has acquired (for example, ISO 14001:2015 environmental management system, ISO 9001:2015 quality management system, ISO 45001:2018 occupational safety management system). Regular mandatory training for all employees as well as detailed internal communication on the topic of compliance/supply chain ensure the necessary awareness.

The Code of Ethics, which is directed both internally and externally, the contractual clauses ("Commitment to sustainable development for suppliers") and this policy statement bindingly summarize the high standards of Framatome GmbH. These expectations of Framatome both to its own employees and to suppliers are clearly formulated in writing in the aforementioned regulations.
Memberships in initiatives that contribute to the protection targets of the LkSG round off the package of measures (CO_2 reduction initiative EV100).

Appropriate Remedies

Framatome receives reports of potential violations along the supply chain, verifies contraventions, carries out inspections and, if it turns out to be true, prevents misconduct in its own business area without delay. For suppliers, a remedy is sought within the meaning of § 7 LkSG. Framatome has appointed a responsible person (Human Rights Officer within the meaning of § 4 para. 3 LkSG) to monitor risk management, who regularly informs the management about the effectiveness of risk management.

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Grievance Mechanisms

Framatome provides its stakeholders with reporting channels for the complaints and notices of human rights violations. These channels are open to everyone. The published company contact details can be used. The Human Rights Officer, the Head of Legal and the Compliance Officer are directly accessible. The Whispli reporting system of EDF SA, used throughout the group, can be used for confidential and, if desired, anonymous contact. Here it is possible to place a message in ten major world languages. A detailed tutorial informs the "whistleblower" about all stages of the procedure - from initial registration of the report to completion of the process.

Organization of Responsibilities

The General Manager of Framatome GmbH bears the entrepreneurial responsibility for checking compliance with and implementation of our human rights due diligence obligations. The compliance department and the human rights officer implement what is necessary with all those responsible in governance and business units.

Indirect suppliers

Framatome strives to contractually oblige direct suppliers to pass on their own commitment to the Code of Ethics of Framatome in the supply chain and actively point out Framatome possible violations by their subcontractors.

Indirect suppliers further away in the supply chain are included in risk management in accordance with § 9 LkSG. The complaints mechanism in the form of the Whispli reporting system is fully available to persons who wish to point out risks for and violations of human rights and environmental obligations within the sphere of activity of an indirect supplier. If Framatome has actual, substantiated indications that a violation of a human rights or environmental obligation appears possible, an incident-related risk analysis will be carried out immediately. Appropriate preventive measures are taken against the polluter.

Documentation and reporting

The fulfillment of due diligence obligations is continuously documented in accordance with § 10 LkSG. Framatome has appointed a responsible person (Human Rights Officer within the meaning of section 4 (3) of the LkSG), who will ensure that risk management is monitored in the company and regularly inform the management about the work of the responsible persons in the context of the LkSG. The obligations of Framatome’s employees in the area of human rights and the environment are set out, among other things, in the Code of Ethics (§§ 3, 4), which must be "respected by every employee."

The annual report to be submitted to the Federal Office for Economic Affairs and Export Control (BAFA) shall set out, in accordance with official requirements, which human rights and environmental risks or violations have been identified and which measures have been taken to comply with due diligence obligations. The report, which is also published on the framatome.com website as long as legally required, is rounded off by an evaluation of the measures and conclusions for future measures.

Outlook

The experience gained with the implementation of the legal requirements as of 1/1/2023 will be collected and incorporated into a process of continuous improvement.

Now and in the future, Framatome conducts its activities with strict respect for human rights and also carries this out in an appropriate manner in the global supply chain. We take responsibility for society and the environment.



Carsten Haferkamp
Managing Director