

BETTER WAYS



HUMAN RIGHTS POLICY



MESSAGE FROM THE CHAIRMAN



The CMA CGM Group is a global leader in transport, logistics, and media, with 160,000 employees across 183 countries.

As a family-run company, our development is built on strong entrepreneurial and human values. At CMA CGM, we believe that business cannot grow without respecting human rights.

This commitment is not just a matter of responsibility. It is also becoming a legal requirement that benefits our teams, our customers, and is essential for building a more sustainable world.

As Chairman and CEO of the CMA CGM Group, my ambition is not only to build one of the largest companies in the world, but also to ensure we remain exemplary in how we care for people, for communities and for our environment.

RODOLPHE SAADÉ

Chairman & Chief Executive Officer
of CMA CGM Group

GENERAL STATEMENT

At the CMA CGM Group, we take our responsibility for Human Rights¹ very seriously and, in doing so, are guided by the principles and guidelines articulated in both the *United Nations Guiding Principles on Business and Human Rights* and the *OECD Guidelines for Multinational Enterprises* ("**Guiding Principles and Guidelines**").

Being a member of the United Nations Global Compact, we also strive to actively uphold and advance the *United Nations 2030 Sustainable Development Goals*.

Wherever we operate, if there is a difference between local law and this *Human Rights Policy*, we seek to apply the higher standard.

APPLICABILITY OF THIS POLICY

This *Human Rights Policy* ("**Policy**") applies to the CMA CGM Group, meaning all legal entities, partnerships, joint-ventures and other business associations that are effectively controlled by CMA CGM S.A., directly or indirectly. We also expect our business partners across the value chain to respect Human Rights.

APPROACH AND RIGHTS-FOCUSED STATEMENTS

We believe in the fundamental nature of Human Rights, and we aim to continuously improve our approach to them across our business. We believe that our business can help to promote Human Rights through our services and other activities, but also acknowledge that, without proper oversight, it can present risks to Human Rights as well.

Our approach begins with understanding how our operations, as well as the operations in our value chain, may impact, either positively or negatively, our rightsholders. Such rightsholders consist of employees and contractors, supply chain workers and local communities. We strive to ensure that their rights are respected and promoted through our activities and the activities in our value chain. Key salient human rights issues and our actions to address them include:

- **OCCUPATIONAL HEALTH & SAFETY: Health & safety in the workplace (both physical and psychological) is a top priority for the Group.** At CMA CGM, people are at the heart of our strategy, and we consider our employees to be our most precious asset. Our culture of safety excellence enables us to reach our objectives. This includes our Safety Vision, which aims at zero accidents and is spread and supported at all hierarchical levels and relevant operational areas. Such culture stands alongside numerous initiatives we have to ensure the well-being of our employees.

¹ For the purposes of this *Human Rights Policy*, "**Human Rights**" means those internationally recognised Human Rights in the: (1) *International Bill of Human Rights* (comprising the *Universal Declaration of Human Rights*, the *International Covenant on Civil and Political Rights* and the *International Covenant on Economic, Social and Cultural Rights*); (2) *ILO Declaration on Fundamental Principles and Rights at Work* and the related fundamental conventions; and (3) *Maritime Labour Convention, 2006*.

- **WORKING HOURS:** As part of our philosophy of caring for and protecting our employees, we ensure that working hours are, at a minimum, in compliance with all applicable laws and mandatory industry standards and strive to keep their duration reasonable. Our approach includes deployment of tools and initiatives to identify over-demanding work schedules and address issues such as fatigue.
- **DISCRIMINATION & EQUAL OPPORTUNITIES:** We fight against discriminatory treatment or comments, particularly on the basis of national or social origin, language, race, gender, sexual orientation, age, religion, political or other opinion, disability or any other kind of status. Means of achieving this in the Group include the promotion of workplace gender equality, incorporation of diversity considerations in HR processes, deployment of leadership programs that are respectful of diversity, equity & inclusion and targeted discrimination training.
- **WORKPLACE HARASSMENT & VIOLENCE:** We take a zero tolerance approach to all forms of workplace harassment and violence, be it physical violence, sexual harassment, verbal abuse, bullying or any other behaviour that can result in physical, psychological or economic harm for victims. This includes taking appropriate measures in all proven cases. We also have designated “sexual harassment” officers in our organisation and deliver training.
- **WAGES & BENEFITS:** We are supportive of workers receiving adequate wages and benefits, which should be, at least, in compliance with the minimum provided by law. Methods deployed for advancing this in the Group include remuneration surveys and living wage studies.
- **HEALTH & LIVELIHOOD OF LOCAL COMMUNITIES:** We strive to ensure that the Group’s activities do not harm local environments and/or local communities’ rights to health, food, water, etc. as a result of impacts on water quality or access, soil quality, biodiversity, air quality, the livelihoods of local communities or wildlife habitats. Our strategy includes implementation of waste and water management programs at our onshore sites, undertaking studies on environmental performance and the preservation of biodiversity in our (re)development projects (e.g., warehouses and terminals) and working to minimise oil pollution incidents at sea.
- **FREEDOM OF ASSOCIATION & COLLECTIVE BARGAINING:** We recognise and facilitate the right of workers to participate in or establish trade unions or other collective representation to advance their rights. We help promote this right in the various countries in which we do business, and support a harmonious, respectful and constructive social dialogue in all our labour-management bodies.
- **MODERN SLAVERY, HUMAN TRAFFICKING & CHILD LABOUR:** We condemn modern slavery in all its forms (including the use of forced or involuntary labour), human trafficking and the use of child labour. We take a zero tolerance approach regarding employees, contractors and business partners when it comes to these issues. Further information on the Group’s efforts in this regard can be found in our annually published [*Modern Slavery Statement*](#).
- **LAND ACQUISITION & INDIGENOUS RIGHTS:** We seek to adequately inform, consult and involve local communities and indigenous groups whose land is used or otherwise affected by the Group’s activities. This is through engagement, planning and strategic initiatives, applies, in particular, to our (re)development projects (e.g., warehouses and terminals) and involves collaboration with other stakeholders such as NGOs.

- **SECURITY PERSONNEL:** We do not tolerate violations by security personnel (whether governmental or privately procured) of the Human Rights of employees or third parties where used to protect our activities including personnel and assets.
- **PRIVACY:** We attach great importance to protecting the privacy (including data privacy) of our employees, business partners and other stakeholders; underpinning this stance is the Group's [data privacy policy](#) and strategy managed by our Ethics & Compliance function and implemented wherever the Group operates.
- **GRIEVANCE MECHANISM & ACCESS TO REMEDY:** We provide access to a whistle-blower system, enabling employees and other stakeholders to report any concern about potential or actual adverse Human Rights impacts in the Group's own operations or value chain, and enabling adequate and effective remediation for victims; further details of this are set out below in the section titled [REMEDATION](#).

HUMAN RIGHTS DUE DILIGENCE

Underpinning the above approach is our aim, in line with the *Guiding Principles and Guidelines*, to increasingly conduct Human Rights due diligence, taking a risk-based approach, in our own operations and the operations of our value chain through processes of identifying, preventing, mitigating and remedying adverse Human Rights risks and impacts.

In our own operations, examples of this include increasing integration of Human Rights considerations in risk assessments and audits and the implementation of policies and processes for engagement with our workforce by dedicated teams in our Corporate Social Responsibility, Human Resources, Procurement, QSSE and Security functions, which contributes to the ongoing identification, management and remediation of any actual impacts.

In our value chain, an example is our sustainable procurement policy, which includes:

- a [Third Party Code of Conduct](#) and a logistics-specific [Sustainable Procurement Charter](#), containing minimum non-negotiable standards (including as regards Human Rights) required of Group suppliers and sub-contractors;
- contractual obligations on suppliers/sub-contractors to respect internationally recognised human rights and to ensure that their supply chains do too;
- rules on subcontracting by suppliers/sub-contractors;
- a supplier/sub-contractor screening & risk monitoring software, which flags Human Rights issues at the qualification stage, enables risk monitoring throughout the contractual relationship and helps coordinate corrective action plans;
- sustainability questionnaires issued to suppliers/sub-contractors;
- supplier/sub-contractor audits; and
- a cross-functional Supplier Risk Committee focused on high-risk cases whose decision may lead to contract suspension or termination.

Ultimately, we believe in doing business with partners that share our values and position in respect of Human Rights and, as an important global player, we intend to increasingly use our leverage where partner-related risks or impacts are identified.

Further details of our due diligence are set out in our [Vigilance Plan](#), which we publish annually as part of our compliance with France's *Duty of Vigilance* law.

RIGHTSHOLDER FOCUS

We pay particular attention to groups of rightsholders at an elevated risk of vulnerability and marginalisation such as women (they now make up over 30% of our workforce and management) and seafarers (owing to the heightened health & safety risks, which life at sea presents). Due to the expansion of our logistics division through various acquisitions in the finished vehicles, last mile delivery and freight forwarding sectors, we are also mindful of conditions for workers in the road transport sector.

ENGAGEMENT WITH STAKEHOLDERS

Beyond rightsholders themselves, we recognise that we cannot address the subject of adverse Human Rights risks and impacts alone as we are part of many communities around the world. As such, and in line with the *Guiding Principles and Guidelines*, we are always keen to engage meaningfully with wider stakeholders such as governments, regulators, customers, investors, trade unions, workers' representatives and civil society, so that their concerns can inform our approach towards Human Rights. As an important global player, we actively use our role in professional forums, inter-company working groups and cross-sector partnerships to advance respect for Human Rights, and we look to develop ever more transparent and constructive relationships with our wider stakeholders on Human Rights topics.

BEYOND RESPECT

At CMA CGM, we go beyond our responsibility to respect Human Rights and are fortunate enough to have the opportunity, given the size and strength of our business, to support and actively promote and make a positive contribution towards them. Our Corporate Social Responsibility strategy involves numerous initiatives every year to positively impact people both within and outside of the Group globally. Within the Group, such initiatives include the training of our employees on subjects such as Ethics, Climate Change and Artificial Intelligence. Outside the Group, our initiatives focus on assisting young people in accessing education and the workforce, bettering human health, promoting opportunities for women and helping out during humanitarian crises. The latter activity sees the Group mobilising its logistics expertise and industrial facilities to help NGOs, international organisations and public agencies transport essential supplies (medicine, food, educational materials, etc.) to affected people.

Further details of our Corporate Social Responsibility strategy and initiatives feature in our annually published [Sustainability Report](#).

GOVERNANCE

Human Rights at CMA CGM is part of our wider strategy and is implemented through a number of policies and procedures including this *Policy*, our [Code of Ethics](#) and logistics-specific [One CEVA Code](#) (both applicable to employees) and our [Third Party Code of Conduct](#) and logistics-specific [Sustainable Procurement Charter](#) (both applicable to business partners). We report on our progress against our targets and goals, including for Human Rights, in our annual [Sustainability Report](#) and [Vigilance Plan](#) and, as a member of the *United Nations Global Compact*, in our annual *Communication on Progress*.

Ultimate oversight of Human Rights at the Group rests with the Chairman and Chief Executive Officer. Operational oversight of Human Rights is managed by the Group General Counsel and the Group Chief Compliance Officer with support from the Group Human Rights Officer. Their coordination with other Group functions including Corporate Social Responsibility, Risk, Audit, Human Resources, Procurement, QSSE and Security as well as certain entities and individuals across our business units, both at head office and abroad, drives the actions and initiatives underpinning our Human Rights strategy. Risks, impacts, actions and initiatives are reported up to various committees including the Group Operational Risk Committee, the Risk, Compliance, Audit & Investigations Committee and the Audit & Accounts Committee (a committee of the Board of Directors). We deploy training to ensure the necessary expertise in, and awareness of, Human Rights within the Group.

REMEDIATION

The Group provides several grievance mechanisms through which employees and other stakeholders can report concerns about actual or potential adverse Human Rights impacts, in our own operations or value chain, and receive remedy. This includes our whistle-blower system, known as the *Ethics & Compliance Helpline*, available 24/7 in multiple languages and comprising an electronic messaging facility and designated telephone numbers, which is accessible on the Group's [designated electronic platform](#).

Reports received via the whistle-blower system are administered externally but managed and investigated internally, and whistle-blowers are kept informed of the management of their reports. Whistle-blowers can remain anonymous if they so wish, in accordance with applicable local law, and all information provided is kept confidential in accordance with applicable law and company policy. The Group undertakes to protect anyone who has, in good faith, made a report from any form of reprisal, and we are committed to taking appropriate action where there has been actual harm resulting from an infringement of Human Rights including enabling adequate and effective remedy where we have caused or contributed to the harm and/or working to prevent reoccurrences. The use of the whistle-blower system is promoted via several media including posters and mandatory annual e-learning for all employees.

We also have a dedicated and directly accessible grievance mechanism for seafarers whose reports can be submitted via the following email address: ho.seafarercomplaints@cmaships.com.

COMMUNICATION OF THIS POLICY

This *Policy* is to be communicated to employees and contractors through the induction process and the company intranet, be the subject of specific training and be made available in different forms where difficulties are envisaged (e.g., in paper form on vessels and at certain warehouses and terminals where computer access is not guaranteed). Business Partners are to be made aware of this *Policy* in the [Third Party Code of Conduct](#) and [Sustainable Procurement Charter](#) and in contract negotiations, and it is to be disseminated to workers in our wider value chain and to external stakeholders such as trade unions.

MANAGEMENT OF THIS POLICY

This *Policy* was developed in the light of a Group-wide human rights impact assessment conducted by a global sustainable business consultancy, which we commissioned. It was drafted by the Ethics & Compliance function (with input from other Group functions) who is responsible for distributing it and updating it, when necessary, for example following a new assessment of Human Rights risks. The effectiveness of this *Policy* and the measures taken under it are monitored on an ongoing basis to enable any improvement necessary. The Board's Audit & Accounts Committee is regularly informed of this *Policy*'s evolution and implementation.

Anyone with a question regarding this *Policy* may contact the Human Rights team in our Ethics & Compliance function at ho.humanrights@cma-cgm.com.

