





CSR

and NON-FINANCIAL INFORMATION / NFIS /

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Although it has acquired an international dimension, Rubis has remained a company on a human scale which, through a decentralised organisation, encourages professionalism, experience and autonomy of its employees, who assume all the responsibilities linked to their positions, including the management of non-financial risk. Rubis believes that involving Management in CSR issues at all levels of the organisation is key to ensuring the sustainability of its activities (section 4.1.1). To better focus its efforts, the Group has carried out a risk analysis that identified 15 risks as being the most material in terms of its activities (section 4.1.2). These risks are grouped around five priority challenges that underpin the Group's CSR approach:

- limiting our environmental impact (section 4.2.2);
- operating in a safe environment (section 4.2.3);
- fighting against climate change (section 4.3);
- attracting, developing and retaining our talents (section 4.4);
- operating responsibly and with integrity (section 4.5).

4.1 Non-Financial Information Statement / NFIS /

This section includes Rubis' CSR strategy, in line with the Non-Financial Information Statement (NFIS) requirements provided for by European Directive 2014/95/EU transposed by French Government Order 2017-1180 and implementing decree 2017-1265. This NFIS presents:

- the main risks related to the Group's activities⁽¹⁾;
- the policies implemented to address those risks;
- monitoring indicators and their results.

4.1.1 A model for sustainable growth

A diagram presenting the **Group's business model** is available in chapter 1 of this document on pages 16-17.

4.1.1.1 Activities structured around three businesses and one joint venture

As an independent player in the energy sector, present in around 40 countries in Europe, the Caribbean and Africa, Rubis is structured around three businesses:

- two operated by Rubis Énergie:
 - **Retail & Marketing** of fuels, liquefied gas and bitumen,
 - **Support & Services**, supporting the Retail & Marketing activity: trading-supply, shipping and refining;

- a new **Renewable Electricity Production** division created in 2022, Rubis Renouvelables, including:

- Rubis Photosol, one of the leading independent producers of photovoltaic electricity in France,
- the acquisition of an 18.5% stake in the capital of HDF Energy, a global pioneer in hydrogen electricity.

In addition, the Rubis Terminal JV carries out a **Bulk Liquid Storage** activity (petroleum and chemical products, biofuels, fertilisers, agrifood products) on behalf of diverse industrial customers.

(1) Including, for this Non-Financial Information Statement, the activities of the Rubis Terminal JV, in which Rubis SCA holds a 55% stake and over which it lost exclusive control on 30 April 2020.

Details of the scope of the NFIS

Exclusion of Rubis Photosol for financial year 2022

In accordance with the rules defined by Rubis, any acquisition of an entity (change in scope) is gradually taken into account in the CSR scope and not before the first full financial year occurring after the date of integration of the entity in the financial scope. For the sake of consistency with the financial scope, it was decided to exceptionally take into account social data (excluding training data) from the financial year 2022. The other CSR stakes require an analysis of the risks and opportunities, the definition of policies to address them and associated objectives during the financial year 2023, as this is a new activity for the Group. For further information, please refer to the methodological note in section 4.6 of this chapter.

In accordance with the EU Taxonomy Regulation 2020/852, Rubis Photosol has been included in the 2022 taxonomy indicators since its consolidation in the financial scope, i.e., 1st April 2022.

Contribution of the Rubis Terminal JV

In accordance with the applicable regulations (Article L. 225-102-1 of the French Commercial Code), the activities of the Rubis Terminal JV, which Rubis SCA holds at 55% and over which it lost exclusive control on 30 April 2020, are included in this Non-Financial Information Statement. The Rubis Terminal JV data are presented as follows: environmental data presented at 100% and Group share (55%); greenhouse gas emissions at 55% in accordance with official methodologies; social/health and safety data at 100%, societal data at 100%. For further information, please refer to the methodological note in section 4.6 of this chapter.

Rubis' development strategy is based on specialised market positioning, a robust financial structure and a dynamic acquisition policy. In addition to these commercial and financial elements, the development strategy also incorporates non-financial objectives that allow the Group to pursue sustainable growth. The regularity of the teams'

performance stems from a corporate culture that values entrepreneurial spirit, flexibility, accountability and the embracing of socially responsible conduct. Rubis conducts its activities by implementing a CSR approach that contributes to the United Nations' Sustainable Development Goals (SDGs).

4.1.1.2 Empowerment and freedom of initiative: people at the heart of the organisation

In keeping with its motto: "The will to undertake, the corporate commitment", Rubis puts human relationships at the heart of its organisation. Individually empowering men and women who contribute to its activities means promoting freedom of initiative and the ethical, social and environmental values that Rubis wishes to see respected by all.

The Group aims to act with professionalism and integrity across its entire scope. This requirement safeguards against any wrongdoing that could be prejudicial to the company,

employees, business relations or to any other external stakeholder, and is reflected in the following principles, detailed in the **Rubis Group Code of Ethics** (see section 4.5.1):

- compliance with applicable legislation and regulations;
- promotion of safety and respect for the environment;
- respect for individuals;
- rejection of all forms of corruption;
- prevention of conflicts of interest and insider trading;
- compliance with competition rules.

4.1.1.3 Strengthened CSR governance thanks to committed management that is aware of ethics, social and environmental risks

The CSR policy is driven by Rubis SCA's Managing Director in charge of New Energies, CSR and Communication in conjunction with the Management Board. She is supported by the Group CSR & Compliance Department, which is responsible for proposing the CSR policy's guidelines and driving the approach in coordination with the various Departments involved (Climate, HSE, Human Resources, Finance, Legal, and Social Engagement).

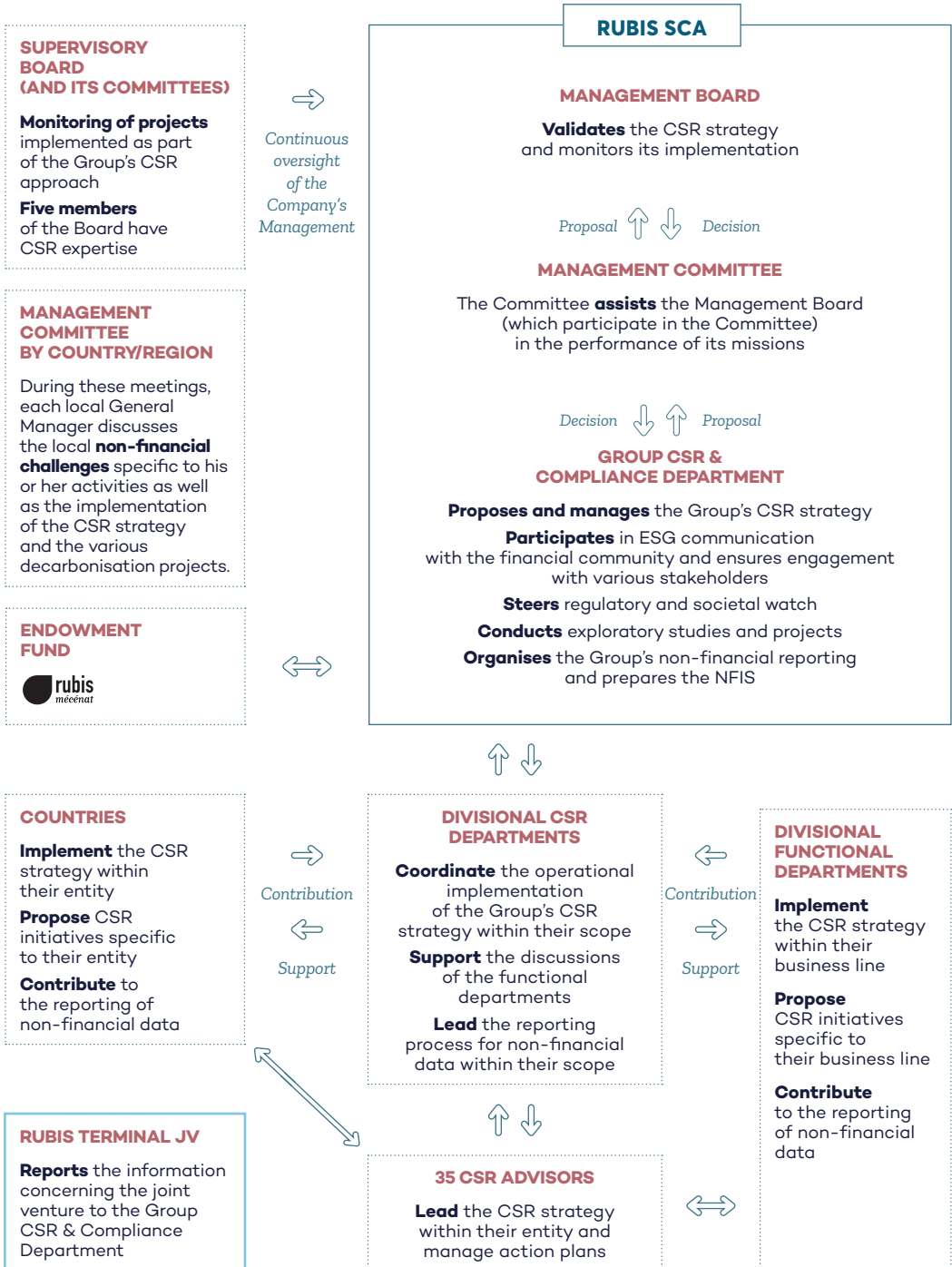
Since 2015, part of the Managing Partners' annual variable compensation has been linked to ethics, social and environmental criteria (see chapter 5, section 54.2). These criteria are also included in the framework letters that set out the annual objectives of Rubis Énergie's Senior

Managers. A presentation of the initiatives taken and results obtained is made to the Supervisory Board's Accounts and Risk Monitoring Committee each year.

In 2022, Rubis continued to expand its CSR teams, both at Group level and in Rubis Énergie's CSR & Climate Department. A network of 35 CSR Advisors throughout the subsidiaries has been set up to ensure the deployment of Rubis' CSR approach in all entities.

Rubis Photosol created the position of CSR Manager in January 2023, whose mission is to roll out and adapt the Group's CSR strategy to this new photovoltaic electricity activity.

CSR GOVERNANCE



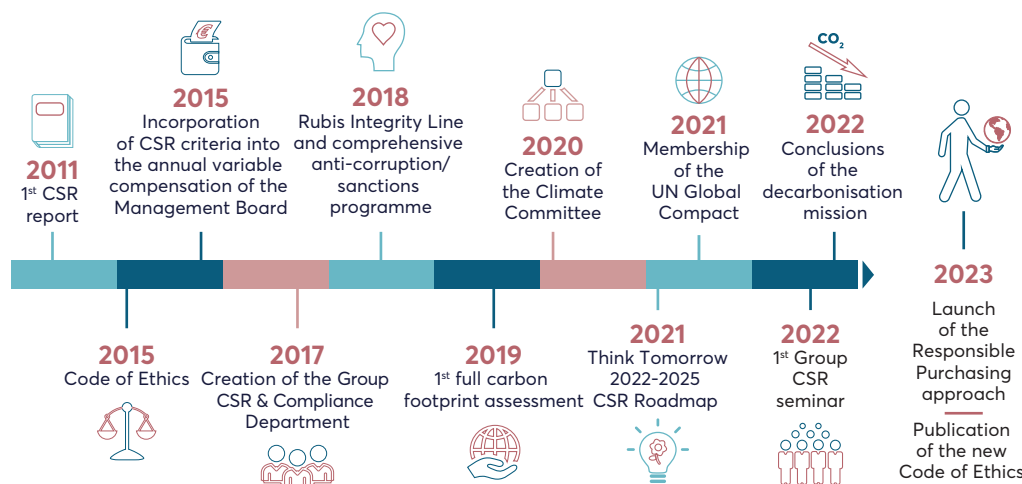
The Rubis Terminal JV continues to implement the CSR policy it has defined to date, in line with Rubis' general principles. In accordance with regulations, as a subsidiary that is 55% owned by Rubis SCA, the Rubis Terminal JV continues to report its annual CSR data to the Group so that they can be included in this Non-Financial Information Statement. However, as this entity is jointly controlled by Rubis SCA and its partner, the CSR policy is now steered and monitored by the joint venture's Board of Directors, on which Rubis SCA is represented. The joint venture's CSR

objectives are adopted by its Board of Directors. As a shareholder, Rubis SCA ensures that the Rubis Terminal JV complies with CSR standards that are at least equivalent to its own.

Lastly, the Rubis SCA Accounts and Risk Monitoring Committee monitors the analysis of the Group's main ethics, social and environmental risks and the corrective measures taken to prevent such risks (see chapter 5, section 5.3.2).

4.1.1.4 A continuous improvement approach

Since 2011, the year in which Rubis issued its first CSR report, the Group has been committed to a continuous improvement process in its approach to CSR.



2022 HIGHLIGHTS

2022 was an opportunity for the Rubis Group to consolidate the implementation of its new CSR approach. Initiated in 2021, with the publication of the CSR Roadmap Think Tomorrow 2022-2025, the Group actively continued to roll out its commitments, in particular with:

- **the acceleration of investments in renewable energies**, with the completion of the acquisition of an 80% stake in Photosol;
- **the conclusions of the assessment mission on the decarbonisation of activities**, making it possible to identify operational actions to achieve the climate strategy defined in 2021;
- **continued strengthening of teams** to accelerate the implementation of the CSR approach;
- **the launch of a biodiversity project**, with the initial assessment of the biodiversity footprint of the main Rubis Énergie business units;

- **the organisation of a CSR seminar** bringing together nearly 80 participants over three days, in particular all of the CSR Advisors as well as the General Managers of the subsidiaries;
- **the preparation of a human rights risk mapping.**

THE CSR ROADMAP, THINK TOMORROW 2022-2025

In September 2021, the Group published its first CSR Roadmap, Think Tomorrow 2022-2025.

With this roadmap, Rubis is bolstering and steering its CSR strategy in line with the United Nations' Sustainable Development Goals (SDGs). It is built around three areas broken down into nine commitments presented in the NFIS risk table in section 4.1.2.2 of this chapter:

- pillar 1: reducing our environmental footprint;
- pillar 2: providing a safe and stimulating working environment;
- pillar 3: contributing to a more virtuous society.

These commitments are combined with 19 objectives and indicators, such as:

- **reducing CO₂ emissions resulting from operations:** -30% by 2030 (2019 baseline) in scopes 1 and 2 (Rubis Énergie scope), an objective that was revised upwards compared to the objective communicated previously (-20% initially announced in June 2021, same scope). An additional target of a 20% reduction in scope 3A CO₂ emissions by 2030 (2019 baseline) (Rubis Énergie scope, mainly outsourced maritime and road transport items, *i.e.*, 45% of scope 3A) was defined in 2022;
- **reducing the number of accidental spills** in excess of 200 litres of products with an impact on the environment (number of spills in 2025 < than that of 2020, *i.e.*, 20);
- **continuously reducing occupational accidents with lost time** for employees and service providers at our facilities:

until 2025, frequency rate < 4.5 for employees, and number of accidents with lost time decreasing for service providers and achieving the objective of “zero fatal accidents” each year;

- **increasing the number of women in senior management:** 30% women on average in Management Committees by 2025;
- **raising awareness of employees about business integrity:** 100% of employees to improve their awareness of ethics and anti-corruption rules in 2023.

Comprehensive information about this roadmap (which has been rolled out in the subsidiaries, which adapt the roadmap according to their local challenges) is available on our website at: https://www.rubis.fr/uploads/attachments/Rubis_CSR%20roadmap_2022_2025-EN.pdf.

MONITORING OUR CSR PERFORMANCE

Rubis SCA wishes to continue its transparency efforts and to interact more proactively with non-financial rating agencies. In 2022, Rubis' efforts were recognised by, in particular:

- MSCI, which renewed Rubis' AA rating;
- CDP, which awarded Rubis a B rating on the Climate Change questionnaire.

MSCI



2022

AA

Performance: high



SUSTAINALYTICS

2022

30.2

Performance: above average

ISS ESG



2021

C-

Performance: average



DRIVING SUSTAINABLE ECONOMIES

2022

B

Performance: above average

OUR CONTRIBUTION TO THE SUSTAINABLE DEVELOPMENT GOALS (SDGS)

Rubis' approach, as well as the associated objectives and actions, are in line with the 17 UN Sustainable Development Goals (SDGs), some of which relate more directly to the Group's activities through their positive contributions:



Through its goal of providing access to energy, and LPG in particular, to as many people as possible, in regions where a large part of the population lacks such access, Rubis contributes first and foremost to SDG 7 "Affordable and clean energy". Rubis also distributes renewable energies.

Presence in 41 countries with diverse climate challenges.



Creation of our new Rubis Renouvelables division in 2022 with Rubis Photosol, one of the leading independent producers of photovoltaic electricity in France.

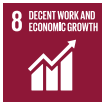
Climate strategy including CO₂ emissions reduction targets (well-below 2°C trajectory).



Promote a safe working environment where everyone is treated with respect, openness and a caring attitude.



Implementation of a corruption prevention programme in all of our activities.



The Group works to provide social security coverage for employees operating in countries where it is not mandatory.



The bitumen distribution activity in Africa meets the road infrastructure development needs of countries.

Target of an average of 30% women on the Management Committees of Rubis Énergie and its subsidiaries by 2025: 28.6% women in 2022.

Target of 100% of employees made aware of ethics and anti-corruption rules: 90% of the Group's workforce in 2022.

98.3% of our employees have health coverage, even in countries where it is not mandatory.

7 countries involved in this activity.

SDGs on which we are particularly vigilant to manage and limit the impact of our activities:



Rubis has also been a member of the UN Global Compact since 2021 and supports the 10 principles of the United Nations Global Compact.



4.1.2 The main CSR risks associated with the Group's activities

In accordance with Articles L. 225-102-1 and R. 225-105 of the amended French Commercial Code, Rubis has conducted a three-stage analysis of its main non-financial risks (section 4.1.2.1), which identified 15 main risks grouped around five priority challenges (section 4.1.2.2).

4.1.2.1 A three-step risk analysis

RISK MAPPING ANALYSIS

Risk maps are prepared by the Group's functional departments (CSR, HSE, Operations, Finance, Legal, etc.), and are completed locally by the operating subsidiaries. They are analysed on a consolidated basis and are then reported to Rubis SCA's Managing Partners and presented to the Accounts and Risk Monitoring Committee. Risk mapping makes it possible to assess (impact and probability) the events that are likely to have a significant adverse impact on the Group's business, financial situation, reputation or outlook, on a scale of 1 to 5. These risk maps are updated annually in view of changes in the Group's business lines and operations and the observations made by employees, stakeholders and the Accounts and Risk Monitoring Committee (see chapter 3, section 3.2.3.2). This process is part of a co-building approach that aims to reach a shared assessment.

ANNUAL RISK MAPPING PROCESS








ANALYSIS OF SECTOR RISKS

In addition to analysing pre-existing risk maps, Rubis' CSR teams use work carried out by other companies and trade organisations to verify the consistency of the risk items identified in their risk mapping and to add to the risk map if necessary.

Existing frameworks (the SASB Materiality Map® in particular), sector benchmarks (IPIECA) or those of trade organisations/associations (Medef, ORSE, C3D) and CSR

publications from other companies were used to assess the most material risks in view of the business segment. The concerns voiced by stakeholders (investors, ESG analysts, civil society) are tracked using a monitoring system put in place by the Group. The results make it possible to weight the risk analysis and account for the importance of these risks to its stakeholders and to identify weak signals and key challenges with respect to the principal areas the Group is expected to act on.

RUBIS' MAJOR STAKEHOLDERS

				
BUSINESS COMMUNITY	FINANCIAL COMMUNITY	HUMAN RESOURCES	ADMINISTRATION	CIVIL SOCIETY
<ul style="list-style-type: none">• Private and professional customers• Suppliers and subcontractors <p>The Group's desire is to provide a diversified offer according to the region of each subsidiary and to give our customers the opportunity to consume better.</p>	<ul style="list-style-type: none">• Investors/ shareholders• Financial analysts <p>The Group's financial strength as well as the consideration of environmental, social and governance challenges at all levels of the Company allow us to establish long-term relations with our financial community.</p>	<ul style="list-style-type: none">• Employees• Staff representative bodies <p>Respect for all our employees allows us to work in a safe and stimulating environment.</p>	<ul style="list-style-type: none">• Local authorities• National authorities• Regulatory authorities <p>In line with its values of integrity and responsibility, the Group ensures compliance with the regulatory standards set by the highest authorities.</p>	<ul style="list-style-type: none">• Non-profits• Local residents• Trade associations <p>The development of the regions in which Rubis operates and the commitment of local people is a source of opportunities and partnerships for the Group.</p>

Regular dialogue with communities

Committed to local populations, the Group values dialogue with its stakeholders and promotes dynamic activity in the regions where it operates, both on an economic and employment level and on the issue of "living as a community."

Depending on the status or mission of these stakeholders, dialogue with stakeholders takes place at the local level (subsidiary), at the level of entire divisions or directly by the parent company (Rubis SCA) (see section 4.5.2.1).

Rubis is also committed through an active and targeted social engagement policy, via its artistic endowment fund Rubis Mécénat and its community investment with subsidiaries, mainly focused on education and health (see section 4.5.2.3).

MULTIDISCIPLINARY WORKING MEETINGS

The consolidated result of risk mapping revised in view of the benchmark described above was presented to HSE Managers (environmental and safety components) and to officers responsible for social issues (personal safety and HR) for review and validation from a non-financial perspective. This review was the subject of regular meetings and discussions with the Group CSR & Compliance Department.

The result of this risk analysis was approved by Rubis Énergie's General Management and then by Rubis SCA's Management Board and the Accounts and Risk Monitoring Committee.

The Rubis Terminal JV has followed the same risk assessment process, which was validated by its General Management. At this stage, the completion of the sale of 45% of the capital of the storage activity to an infrastructure fund in 2020 is unlikely to jeopardise the analysis of CSR risks relating to the joint venture, whose business remains unchanged. The periodic review of this analysis is now presented by the Rubis Terminal JV to its shareholders at meetings of its Board of Directors, which validates the objectives.

Rubis Photosol, which is outside the scope of the NFIS for financial year 2022 due to its joining the scope of the Group during the financial year, will formalise an analysis of its non-financial risks in 2023.

4.1.2.2 Fifteen risks grouped around five key challenges

The analysis of CSR risks highlights 15 main risks relating to the Retail & Marketing and Support & Services activities of Rubis Énergie, and the Rubis Terminal JV*. The Photovoltaic Electricity Production activity (Rubis Photosol) was integrated into Rubis during the financial year 2022. Given the specific nature of this activity requiring dedicated risk analyses and the implementation of related management measures, this activity is not therefore included in the scope of the NFIS for the financial year 2022. It will be included from financial year 2023.

These risks are grouped around the following five challenges:

- limiting the **environmental impact** of activities;
- protecting the **health and safety of people** working on site and of local residents, and **facility security**;
- fighting against **climate change**;
- attracting, developing and retaining **talents**;
- **business ethics** demonstrated by operating responsibly and with integrity.

CHALLENGES	MAIN RISKS	MONITORING INDICATORS	MEANS AND OBJECTIVES
Limiting our environmental impact	Water and soil pollution	Number of accidental spills reaching the environment > 200 litres	By 2025, reduce the number of accidental spills reaching the natural environment > 200 litres to less than 20 (2020 baseline) 0 accidental leaks, excluding containment, in accordance with the GHS leak classification system ⁽²⁾
	Emissions	Emissions from major industrial sites (NO _x , VOC, SO ₂)	Vapour recovery devices; installation of floating screens on storage tanks
	Use of resources	Used/treated water	Green Water project (Rubis Énergie): seawater desalination to significantly reduce freshwater consumption at the SARA refinery Use of rainwater, wastewater treatment
Operating in a safe environment	Operational safety	Number of major industrial accidents	"Zero major industrial accidents" target
	Personal safety Health and safety at work	Frequency rate of accidents with lost time > 1 day declared (excluding commuting accidents) (employees)	Maintain a lost-time accident frequency rate <4.5 until 2025
		Number of accidents with lost time > 1 day declared (service providers)	Maintain the number of accidents with lost time <32 until 2025 (2020 baseline)
		Change in Total Incident Rate (TIR)	Reduce employee TIR by 25% by 2025 (vs 2020)
		Number of occupational accidents with lost time	Achieve 0 accidents with lost time
		Number of deaths following an occupational accident (excluding commuting accidents)	Achieve and maintain the objective of "zero fatal accidents" each year
		Defensive driving training rate for drivers in the most exposed countries ⁽³⁾	100% of drivers in the most exposed countries trained in 2023
	Safety/health of customers and local residents	Percentage of industrial sites holding at least one certification (mainly ISO 9001, 14001 and 45001)	Maintain and renew our certifications

* As far as possible, the description of the risks relating to the Rubis Terminal JV is presented separately from the risks relating to the Retail & Marketing and Support & Services activities. However, for the sake of clarity for the reader and to limit duplication, as certain risks are similar and are subject to similar management measures, they are not presented in separate paragraphs.

SCOPE	2022 RESULTS	2021 RESULTS	RUBIS CSR ROADMAP COMMITMENTS ⁽¹⁾
Rubis Énergie	14	23	Reduce accidental product spills
Rubis Terminal JV	0	1	
Rubis Énergie Rubis Terminal JV	NO _x Rubis Énergie (refining): 181 tonnes Rubis Terminal JV – Group share: 2.75 tonnes	NO _x Rubis Énergie (refining): 125 tonnes Rubis Terminal JV – Group share: 5.8 tonnes	
	VOC Rubis Énergie (refining): 186 tonnes Rubis Terminal JV – Group share: 159.5 tonnes	VOC Rubis Énergie (refining): 205 tonnes Rubis Terminal JV – Group share: 148 tonnes	
	SO ₂ Rubis Énergie (refining): 288 tonnes Rubis Terminal JV: NA	SO ₂ Rubis Énergie (refining): 62 tonnes Rubis Terminal JV: NA	
Rubis Énergie Rubis Terminal JV	Water used Rubis Énergie (refining): 252,906 m ³ Rubis Terminal JV – Group share: 99,170 m ³	Water used Rubis Énergie (refining): 150,104 m ³ Rubis Terminal JV – Group share: 169,604 m ³	
	Water treated Rubis Énergie (refining): 88,319 m ³ Rubis Terminal JV – Group share: 212,660 m ³	Water treated Rubis Énergie (refining): 65,417 m ³ Rubis Terminal JV – Group share: 256,131 m ³	
Rubis Énergie Rubis Terminal JV	Rubis Énergie: 0 Rubis Terminal JV: 0	Rubis Énergie: 0 Rubis Terminal JV: 0	
Rubis Énergie	4.7	4	Reduce personal injury operating accidents with lost time
Rubis Énergie	11	20	
Rubis Terminal JV	-3%	-5%	-
Rubis Terminal JV	13	8	
Rubis Énergie	0	1 employee; 2 service providers	Zero fatal accidents
Rubis Énergie	81% (91% of employee drivers and 78% of external drivers)	62% (76% of employee drivers and 59% of external drivers)	Raise awareness of traffic accidents in our activities
Rubis Énergie Rubis Terminal JV	Rubis Énergie: 32% Rubis Terminal JV: 100%	Rubis Énergie: 27% Rubis Terminal JV: 100%	

CHALLENGES	MAIN RISKS	MONITORING INDICATORS	MEANS AND OBJECTIVES
Fighting against climate change	GHG emissions	Greenhouse gas emissions	Decarbonisation plan for operations (by 2030, target of -30% for scopes 1 and 2 (vs 2019, at constant scope)) <ul style="list-style-type: none"> • scopes 1 and 2 emissions • activity carbon intensity indicator (scopes 1 and 2/EBITDA) By 2030, target of -20% of scope 3A (excluding products sold) (Rubis Énergie scope, mainly outsourced maritime and road transport items, i.e., 45% of scope 3A) (vs 2019) Scope 3A emissions
	Adaptation of activities	Percentage of business units that organised an energy efficiency awareness campaign among their customers	From 2022, each business unit will be required to organise at least one awareness-raising initiative per year
		Carbon intensity indicators for products sold	A target for reducing the carbon intensity of our products will be set in 2023 ⁽¹⁾ Scope 3B emissions
Attracting, developing and retaining talents	Diversity and equal opportunities	Percentage of women in governing bodies	By 2025, an average of 30% of Management Committee members to be women Maintain a proportion of at least 30% of the least represented gender on the Group's Management Committee By 2030, 40% of the Executive Committee should be women
	Developing skills	Percentage of employees trained	100% of employees trained each year 10% of employees trained in changes in our business lines (energy transition, CSR, etc.) each year to 2025
	Quality of life at work	Absenteeism rate for non-occupational illnesses	Maintain a social environment conducive to employee well-being and retention
	Employees' involvement in the Group's value creation	Percentage of employees receiving a pay rise during the year	Group social policy promoting employee commitment to work
	Fighting corruption	Percentage of employees made aware of ethics and anti-corruption rules	100% of employees made aware in 2023
Working responsibly and with integrity	Responsible purchasing	Integration of CSR/ethics criteria	Launch of a responsible purchasing approach in 2023: mapping of high-risk purchases, action plan, responsible purchasing charter
	Regional, economic and social impact	Number of beneficiaries of community investment	Continuation of international social engagement policy
		Rate of business units implementing community investment that meets a local need	100% of business units in 2025

- (1) CSR Roadmap Think Tomorrow 2022-2025, concerning the Rubis Énergie scope, since it was published, before the acquisition of Rubis Photosol finalised in April 2022. The Rubis Terminal JV, jointly controlled by Rubis SCA and its partner, has defined its own roadmap, the Mid Term Sustainability Roadmap 2022-2030.
- (2) The accidents taken into account are classified according to the GHS (Globally Harmonised System for the Classification and Labelling of Chemicals).
- (3) The countries in which the Group operates considered to be the most exposed to road safety risks are among the 100 countries identified by the WHO as having the highest number of accidents: [https://www.who.int/data/gho/data/indicators/indicator-details/GHO/estimated-road-traffic-death-rate-\(per-100-000-population\)](https://www.who.int/data/gho/data/indicators/indicator-details/GHO/estimated-road-traffic-death-rate-(per-100-000-population)).
- (4) The Group planned to define a target for reducing the carbon intensity of products sold in 2022. Nevertheless, as the acquisition of Rubis Photosol led to a change in the product mix sold, through the integration of new activities, the definition of this objective was postponed.
- (5) Excluding beneficiaries of the exceptional donation to the Fondation de France's Ukraine Solidarity Fund. Change in the calculation method in 2022 vs 2021: the number of beneficiaries is calculated pro rata to the amounts paid to each association.

SCOPE	2022 RESULTS	2021 RESULTS	RUBIS CSR ROADMAP COMMITMENTS ⁽¹⁾
Rubis Énergie	235 kt CO ₂ eq scope 1 98 kt CO ₂ eq scope 2 0.360	196 kt CO ₂ eq scope 1 10.9 kt CO ₂ eq scope 2 0.375	Reduce the carbon footprint of our industrial sites, vessels and trucks (scopes 1 and 2)
Rubis Énergie	225 kt CO ₂ eq scope 3A	183 kt CO ₂ eq scope 3A	Reduce the carbon footprint of our value chain
Rubis Énergie	48%	NA	Raise our customers' awareness of energy efficiency
Rubis Énergie	13,034 kt CO ₂ eq scope 3B	12,867 kt CO ₂ eq scope 3B	Reduce the carbon intensity of our products and diversify our business lines
Rubis Énergie	28.6%	27.4%	Strengthen the diversity of our teams
Rubis SCA	Gender parity	Gender parity	
Rubis Terminal JV	25%	25%	Support the development of our employees' skills
Rubis Énergie	90.1%	82.4%	
Rubis Énergie	28%	NA	Be an attractive employer
Rubis Énergie Rubis Terminal JV	Rubis Énergie: 2.17% Rubis Terminal JV: 7.1%	Rubis Énergie: 1.81% Rubis Terminal JV: 5.93%	
Rubis Énergie Rubis Terminal JV	Rubis Énergie: 66.1% Rubis Terminal JV: 50.6%	Rubis Énergie: 50% Rubis Terminal JV: 53.6%	Strengthen our employees' understanding and adherence to our ethics rules and principles
Rubis Énergie Rubis Terminal JV	Rubis Énergie: 88% Rubis Terminal JV: 98%	Rubis Énergie: 76% Rubis Terminal JV: 77%	
Rubis Énergie	NA	NA	Ensure responsible management of our supply chain
Group (Rubis SCA, Rubis Énergie and the Rubis Terminal JV)	Nearly 50,000 beneficiaries ⁽⁵⁾	Nearly 200,000 beneficiaries	Contribute to local development and address global societal challenges
Group (Rubis SCA, Rubis Énergie and the Rubis Terminal JV)	67%	67%	

A RISK PREVENTION POLICY ADAPTED TO THE GROUP'S ACTIVITIES

Appropriate procedures are implemented to address the challenges identified in the risk analysis.

Health and safety risks for individuals working at the sites and for local residents, and the risks relating to the activities' environmental impact are subject to enhanced preventive measures, which are carried out in the framework of regular inspection programmes and major capital expenditures (see section 4.2).

In line with the Group's values, social risks are managed in a decentralised way to make the most of human capital and to take into account the specific nature of the Group's activities. In addition to workplace health and safety, which as an industrial group are Rubis' priorities, the issues of well-being at work, equal opportunities in the workplace and sharing the Group's growth with employees are carefully monitored (see section 4.4).

Other challenges, such as ethics and corruption risks, are also subject to specific policies and procedures drawn up as part of the continuous improvement process (see section 4.5).

Details about the main risks relating to the Non-Financial Information Statement and on the related policies and indicators appear in sections 4.2 to 4.5 of this document. The main risks are identified using the following pictogram: **/NFIS/**. Other challenges, which were not identified as priority risks in the risk analysis but that are nevertheless considered as important for both the Group and its stakeholders or that must be disclosed in accordance with current regulations, are also included in sections 4.2 to 4.5.

The Rubis Terminal JV's risk prevention policy, which has been in place for many years, was developed in line with Rubis Group standards. Now a co-shareholder of this joint venture, Rubis SCA, via its representatives on the joint venture's Board of Directors, continues to promote the Group's standards *vis-à-vis* the partner and to monitor the Rubis Terminal JV's efforts and performance.

4.1.3 Comparability, reliability and control of social and environmental information

The comparability and reliability of information primarily results from the standardisation of methods used for reporting social and environmental data, as described in the **methodology note** (see section 4.6).

The reported information is checked using verification procedures and analyses. Internal audits relating to certain non-financial information (ethics, anti-corruption) are also carried out.

A **cross-reference table** listing the provisions of the French Commercial Code is provided in section 4.6.4 in order to facilitate the reading of this chapter.

4.2 Limiting our environmental impact and operating in a safe environment

Protecting people and the environment is everyone's business and a priority for Rubis. As a committed and responsible company, the Group continuously works to protect its environment (section 4.2.2) and seeks to operate safely (section 4.2.3). To manage this approach to quality, health, safety and the environment, the Group has defined a general framework and a governance system has been implemented for each activity (section 4.2.1).

4.2.1 Our QHSE approach / NFIS /

4.2.1.1 General principles

A general framework for quality, health, safety and the environment (QHSE) has been defined in order to prevent risks and to limit the negative impacts of our activities.

The QHSE policy framework, which is referred to in the Group's Code of Ethics, states that **each employee must act responsibly when performing his/her duties, comply with the health, safety and environmental protection procedures on site, and pay particular attention to compliance with these rules by all parties** (colleagues, suppliers, external service providers, etc.). This framework constitutes the common foundation for all the Group's activities.

In order to account for the challenges and risks that are specific to Rubis Énergie's activities and those of the Rubis Terminal JV, **each of them has drawn up their own QHSE policy consistent with the Group's general principles.**

Concerning Rubis Photosol, the integration work will focus on potential adjustments to its QHSE policy during 2023 and the setting of an action plan and related objectives. These policies clarify the Group's principles by transposing them into operational requirements. Dedicated governance has been set up for the implementation of these policies.

The main objective of these QHSE policies is to **prevent risks in order to better protect physical and environmental integrity and to minimise the impacts of a major accident** (see section 4.2.3). This is reflected in the implementation of the measures required to limit incidents as far as possible and thereby reduce the probability of a severe event occurring. In addition, the Group also strives to **reduce its environmental footprint** (see section 4.2.2).

4.2.1.2 Management system

OVERSEEING OF RISK MANAGEMENT

The implementation of QHSE policies is overseen by facility Managers who are assisted by Rubis Énergie's and the Rubis Terminal JV's industrial, technical and HSE Departments. At larger sites, quality and/or HSE engineers are also involved in this process. The General Managers of Rubis Énergie's subsidiaries and their functional departments report on their HSE work at Management Committee meetings that are held within each division twice a year, in the presence of Rubis SCA's Management Board. The Rubis Terminal JV's management reports on the implementation of its HSE policy and its results to its Board of Directors, on which Rubis SCA has representatives.

Rubis Énergie (Retail & Marketing and Support & Services activities)

Rubis Énergie believes that it is essential to protect the health and safety of people and property located in or near its facilities. **As such, Rubis Énergie has established a "Health, Safety and Environment (HSE) Charter", which**

requires its affiliated companies to comply with HSE objectives that it considers to be fundamental (and which sometimes go beyond locally applicable regulations), and with the additional aim of heightening employee awareness about safety.

These general objectives are to be achieved through the following key measures:

- disseminating Rubis Énergie's fundamental HSE principles within its subsidiaries in order to create and strengthen HSE culture;
- implementing sector-specific best business practices;
- having document systems established in accordance with "quality" standards ensuring reliability and safety of operations;
- regularly assessing technological risks;
- enhancing preventive facility maintenance;
- regularly inspecting facilities and processes (transport activities included) and addressing any identified deficiencies;

- analysing all incidents and proposing to all subsidiaries lessons learned documents on notable events in order to avoid their recurrence;
- regularly training employees and raising awareness about technological risks.

Depending on the activity, the following actions are also taken:

- **taking care to analyse the state of facilities in light of specific Group standards and local regulations** and, as necessary, scheduling work to bring them up to standard;
- **joining organisations or associations (GESIP, JIG, IATA, Oil Spill Response Ltd, WLPGA, Eurobitume, Energy Institute)** in order to share feedback and implement the best practices of the profession, as well as to benefit from specialised expertise for operations or in the event of an incident (see details in section 4.2.2.1) and maritime pollution liable to occur during loading/unloading operations in Rubis Énergie's depots.

Rubis Terminal JV (Storage activity)

The Management of the Rubis Terminal JV has rolled out the shared cultural values, including the principles of the "Always safe" safety culture, to all its subsidiaries and joint ventures.

Its three fundamental principles are:

- **"safety is in our DNA"**, the integration of safety as a priority at all levels of the Company;
- **"prevention culture"**, openly share knowledge and experiences in order to improve prevention and integrate it upstream of design and operations;
- **"proactive attitude"**, reflect and analyse in order to act before an event occurs by having a positive, honest and transparent attitude to help each other detect dangerous situations and correct them quickly.

The Rubis Terminal JV considers that protecting health and safety contributes to the Company's success and should therefore never be neglected, and that action must be taken upstream to avoid accidents and occupational illness. The Management of each Rubis Terminal JV industrial site has the obligation to ensure that regular audits assessing compliance with safety principles and standards take place. Performance indicators have been put in place in order to

trigger and monitor a continuous improvement process with respect to health and safety.

The Rubis Terminal JV's General Management and that of each facility make an annual commitment to employees, customers, suppliers, governments and local residents, pledging to apply a QHSE policy incorporating safety improvement targets specific to each site. Managers also agree to adhere to recognised international QHSE standards, which are set out below.

Finally, the Rubis Terminal JV has committed to a multi-year quantified programme for reducing its energy consumption and its CO₂ and atmospheric emissions through the internal distribution of a document entitled "Group objectives for environmental impacts and energy consumption" to limit its environmental footprint.

Following its materiality analysis carried out in 2022, a roadmap "Rubis Terminal Infra Sustainability Mid Term Roadmap 2022-2030" was drawn up with medium-term commitments and was validated by its Board of Directors.

This document, built on the principle of the 3Ps (People, Planet, Prosperity), taking into account the materiality of its activity on its environment, details objectives in terms of reducing greenhouse gas emissions, and monitoring sustainable and safe operational methods, while mitigating its impact on the environment. In addition, the environmental policies of the Rubis Terminal JV define the monitoring and improvements of energy and water consumption and waste management, the results of which are presented in the corresponding sections of this chapter (section 4.3.4.3 for the carbon intensity of the activity, section 4.2.2.3.1 for water consumption and section 4.2.2.3.2 for waste management).

The following actions are also implemented:

- **monitoring of programmes such as HACCP or GMP+** (see table below), under which the Rubis Terminal JV has committed to complying with the sector's regulatory provisions and professional recommendations for its various activities, comparing its practices with best industrial practices and to constantly seek to improve its performance in the areas of safety, health and environmental protection;
- regarding the chemical product storage depots, **joining the Chemical Distribution Institute – Terminals (CDI-T)**, a non-profit foundation working to improve safety at industrial sites in the chemicals industry.

Site certification

Certain operated sites are certified, particularly those classified as Seveso.



Some of Rubis Énergie's distribution or industrial activities (Vitogaz France, Sigalnor, SARA, Lasfargaz, Rubis Energia Portugal, Vitogaz Switzerland, Rubis Energy Kenya, Vitogas España and Easigas) are ISO 9001-certified (**quality management system**), as are all of the Rubis Terminal JV's depots.



The activities of SARA (refinery), Vitogaz Switzerland, Vitogas España and Rubis Energia Portugal (Retail & Marketing) are ISO 14001-certified (environmental management system), as are all of the Rubis Terminal JV depots with a chemical product storage activity. This standard provides a framework for controlling **environmental impacts** and seeks to ensure the **continuous improvement of its environmental performance**.



The activities of Vitogaz Switzerland and the Rubis Terminal JV's Spanish depots are certified ISO 45001, while the activities of Rubis Energia Portugal and the Rubis Terminal JV's Spanish depots are OHSAS 18000-certified (**occupational health and safety management**)



For the Rubis Terminal JV's chemical product depots, the Chemical Distribution Institute – Terminals (CDI-T) is in charge of **inspections and audits of the transport and storage elements of the global chemical product supply chain**.



The Rubis Terminal JV's Dunkirk site has a continuous risk management approach regarding the **storage of foodstuffs**. Employees are trained in best practices through the analysis of food risks. They apply the principles of this approach, known as HACCP, and know how to meet the particular needs of the food sector, such as product traceability throughout the logistics chain. Moreover, the terminal has declared that it stores products used for animal feed. This has been registered with the DDPP (Direction départementale de la protection des populations – Regional Directorate for the Protection of Populations). Finally, this site is preparing to obtain GMP+B3 certification for the transshipment and bulk storage of liquids used for animal feed.



Vitogaz France has held NF Service Relation Client (NF345) certification since 2015. It was the first French company to obtain certification under the new version 8, in December 2018.

Revised in 2018, **NF Service Relation Client** certification is based on international standards ISO 18295-1 & 2. A guide to best practices in **customer relationship management**, it takes **customer expectations** into account and aims to guarantee constant improvements to **service quality**. For Vitogaz France, this approach to seeking excellence in customer experience aims at establishing a long-lasting commercial relationship, delivering quality service over time, ensuring that transmitted information is exhaustive and clear, and acting promptly in accordance with its commitments.



The Spanish depots of the Rubis Terminal JV, as well as the Rotterdam and Dunkirk terminals, are certified ISCC, and ISCC+ for Dunkirk. This certification indicates that **traceability is ensured** from the collection of raw materials (from biomass or waste and residues) to the transformation process, in accordance with this international sustainability standard applicable to all sectors.

32% of Rubis Énergie's industrial sites (Retail & Marketing and Support & Services activities) have at least one certification (ISO 9001, 14001 and 45001).

100% of the Rubis Terminal JV's industrial sites have at least one certification.

4.2.2 Limiting our environmental impact

The risks to the environment stemming from Group activities are monitored and managed very closely.

ACTIVITIES WITH SPECIFIC ENVIRONMENTAL IMPACTS

Rubis' business lines are organised around three activities: Retail & Marketing, Support & Services, and Photovoltaic Electricity Production (the latter being outside the scope of the NFIS for the financial year 2022), as well as a Bulk Liquid Storage activity on behalf of a diversified industrial customer base, operated by the Rubis Terminal JV. These activities present industrial risks that, depending on the activities and the nature of the products being handled (fuels, biofuels, liquefied gas, bitumen, chemical and agri-food products and solar electricity), may have environmental impacts of varying nature and scale. These risks are described in each part of this section.

The environmental impact of **Rubis Énergie's Retail & Marketing** activities stems mainly from the risks of accidental spills or the leakage of products from various Group sites (storage depots, service stations, filling plants for LPG cylinders, customer facilities, aviation or marine refuelling facilities) that are generally limited in size.

The environmental impact of **Rubis Énergie's Support & Services** activity stems mainly from the Group's sole refinery in the French Antilles (SARA) due to its industrial processing activities, and from its shipping business.

The environmental impact of the **Rubis Terminal JV's Storage** activity results from the large size of the depots (and therefore the quantity of products being stored and transferred) and the nature of some of the products being handled, which require energy-intensive facilities (boilers, for example).

MEASURES LIMITING THE GROUP'S ENVIRONMENTAL IMPACT

This chapter details the preventive measures put in place and key monitoring data for the following priority environmental risks, identified by means of pictogram / NFIS /:

- **preventing water and soil pollution** that may be caused by accidental product spillages (section 4.2.2.1);
- **assessing and limiting atmospheric emissions from industrial activities** (section 4.2.2.2);
- **optimising the use of resources** by conserving water resources (section 4.2.2.3.1).

Another risk the Group does not consider to be a priority in terms of its activities but that is significant nevertheless is that of waste management (section 4.2.2.3.2).

The Group's climate strategy and all the actions it implements to reduce the environmental impact of its activities, also aim to protect biodiversity (section 4.2.2.4).

4.2.2.1 Water and soil pollution / NFIS /



The risks of water and soil contamination related to the Group's operations result mainly from accidental spillages of stored and/or transported products, which at some sites may result from activities that predate the Group's presence at the site. In general, the entities are gradually investing in the sites to improve the safety of their facilities and to eliminate pollution risks to every possible extent.

RUBIS ÉNERGIE

Retail & Marketing activity

Risks

The petroleum products distribution business is liable to generate risks of water and soil contamination resulting from accidental spills, tank overflows, spreading, tank and/or pipe leaks, and wastewater discharges (at fuel depots,

service stations, and customer facilities). Road transport of products, which is necessary to supplying distribution sites and customers (fuel, bitumen) is also liable to result in accidental spills.

Measures to prevent and contain pollution

Tanks containing hazardous products and associated pipework undergo systematic inspections at storage sites in accordance with international standards during regular mandatory on-site visits, generally once every 10 years. Moreover, to prevent groundwater and soil pollution in the event of accidental spillage, storage tanks are often installed in watertight retention basins. These basins are kept shut. They are only opened for manual emptying after checks have been performed confirming the absence of pollutants. In the loading/unloading zones at storage sites for tank trucks, the retention platforms are purpose-designed for each type of product being handled and, as a general rule, are connected to oil-water separators connected to treatment plants or buffer basins. Water discharged into the environment after treatment is analysed quarterly.

Equipment used at Rubis Énergie service stations that is liable to generate soil pollution (mainly tanks and piping) is checked periodically (particularly in respect of the absence of defects and water-tightness) and is gradually being replaced by double-wall technology. This includes double-walled underground tanks and pipes that are equipped with leak detectors which provide continuous oversight to guard against any possible pollution. The medium-term (2030) objective is to replace single-walled tanks that are over 30 years old. The regions most affected by this measure are the Bahamas, Jamaica, the West Indies, Haiti and East Africa. As an example, the tanks at seven service stations, i.e., approximately 25 tanks, were replaced in the Caribbean region in 2022, representing an overall investment of approximately US\$5 million.

In parallel, Rubis Énergie is reinforcing its preventive maintenance programmes for this equipment (see section 4.2.3.1) and is continuously improving the safety/environmental training of service station managers, notably to ensure that they have the resources available to immediately detect any loss of product due to defective equipment/practices or fraud.

Rainwater that may have been polluted through contact with roadways is increasingly being treated before being discharged into the environment; service stations requiring them are equipped with rainwater collection and treatment systems whenever road repair work is planned.

Regarding the road haulage of petroleum products, in addition to the application of the regulations applicable to the transport of hazardous materials, additional measures are taken to prevent the risk of traffic accidents. Courses

in defensive driving have been introduced in countries where this risk is heightened due to driving habits, distances driven or poor road infrastructure quality.

Moreover **the cleaning of gas cylinders** takes place in a closed circuit, which limits water consumption and the risk of wastewater contamination.

Support & Services activity

Risks

The Support & Services business (refining and shipping) could give rise to water and soil pollution in the event of accidental spillage or leaks and through the use of wastewater (desalination water, stripping treatments, tank draining), bulk tank drain water and ballast wastewater.

Moreover, the shipping activity can generate risks of water pollution during vessel loading/unloading operations or in the event of a shipping accident.

Measures to prevent and contain pollution

For vessel chartering, Rubis Énergie calls on the services of a specialised company that systematically vets the vessels in question. This company collects information about the vessel's condition (construction date, maintenance, etc.) and the operator's quality (crew reliability, etc.). It then submits a recommendation on the risks of using the vessel that the teams rely on before signing the charter agreement.

Rubis Énergie has also taken preventive measures to address maritime pollution at its terminals during product loading/unloading operations.

Results

Water pollution

(in kg)	Suspended solids released into water*			Petroleum products released into water		
	2022	2021	2020	2022	2021	2020
Refining (Support & Services)	2,390	1,884	2,120	71	159	277
Retail & Marketing	Not available	Not available	Not available	Not available	Not available	Not available

* Suspended solids released into water: see definition in section 4.6.3.

In the refinery, the commissioning of a new lamellar separator in early 2019 made it possible to significantly reduce the amount of suspended solids and petroleum products in wastewater. Without calling into question the improved performance achieved following this investment, it must be emphasised that the sharp reduction in discharges observed in 2020 is attributable to shutdowns

of production units due to two major scheduled shutdowns for periodic facility maintenance. The overall decrease in flows of pollutants at the refinery in 2021 and 2022 can be explained by improved performance in residual water treatment and a lower intake of process water resulting from the manner in which the facilities operate.

Soil pollution

In accordance with professional practices, Rubis Énergie monitors **accidental spillages of liquid petroleum products with a unit volume of more than 200 litres**. In 2022, the subsidiaries recorded 14 incidents (mainly due to facility leaks, traffic accidents or non-compliance with operating procedures). This decrease compared to 2021 (23 incidents reported) is the result of better awareness-raising among local teams and actions to upgrade HSE standards.

Any significant spill must be followed by remedial action aimed at returning the environment to its initial state as quickly as possible.

Rubis Terminal JV

Risks

The Storage activity can generate accidental pollution of water and soil, in particular by overflows from secondary retention tanks surrounding tanks, piping or transfer stations located on the sites, by leaks from pipes outside the sites, as well as discharges into wastewater.

Measures to prevent and contain pollution

At storage sites and transport pipelines in the public sector, a preventive maintenance programme is in place for all tanks and equipment containing hazardous products. The systematic inspection of tanks containing hazardous products and their associated pipes is carried out in accordance with international standards, during various periodic visits. Moreover, to prevent groundwater and soil pollution in the event of accidental spreading, storage tanks are (with some exceptions) installed in watertight retention basins (lined with concrete or clay compounds). These basins are kept shut. They are opened manually after checks have been performed confirming the absence of pollutants.

In the loading/unloading zones for tank trucks, railway tanker wagons and at each wharf for vessels and barges carrying hazardous products, the retention platforms are purpose-designed for each type of product handled and, as a general rule, are connected to oil-water separators connected to treatment plants or buffer basins. Water is tested at discharge points at least every half-year, and monthly at the outflows from treatment plants. Weekly or monthly checks are carried out on nearly all sites to verify that there is no floating pollution in the groundwater monitoring wells located downstream of facilities.

Results

Water pollution

(in kg)	Suspended solids released into water*			Petroleum products released into water		
	2022	2021	2020	2022	2021	2020
Rubis Terminal JV	4,296	4,672	3,843	384	274	366
• of which Group share	2,363	2,570	2,114	211	151	201

* Suspended solids released into water: see definition in section 4.6.3.

The volume of suspended solids discharged into the water is very low compared to the volume of water discharged (over 380,000 m³). The change between 2021 and 2022 is small.

Soil pollution

The incidents of reported soil pollution by hazardous products correspond to pollution where volumes are greater than 200 litres occurring during the year. In 2022, no incidents were reported.

4.2.2.2 Emissions from industrial activity / NFIS /

With the exception of refining in the French Antilles, Rubis Énergie's activities are not classified as industrial transformation processes. Due to their size, the Rubis Terminal JV's storage sites are the other significant source of atmospheric pollutants within the Group. The Group is committed to implementing a policy to limit these emissions.

To this end, the various sources of pollutant emissions are being evaluated progressively. The carbon footprint assessment is published in section 4.3.4 relating to climate change.

RUBIS ÉNERGIE

Retail & Marketing activity

Risks

The petroleum products distribution business generates VOC (volatile organic compounds) emissions; however, these emissions remain relatively low.

In liquefied gas distribution, VOC emissions are generated by connection/disconnection operations when filling cylinders and trucks and when degassing cylinders for technical inspections. Other VOCs are made up of the solvents contained in paints used for cylinders.

Regarding automotive fuel distribution, storage and distribution facilities generate VOC emissions from petrol. These emissions are particularly low due to measures taken to collect petrol fumes, as described below.

The Retail & Marketing activity does not emit significant volumes of NO_x.

Limitation measures

In fuel depots, particularly those equipped with source loading stations, petrol vapours are collected during tank truck loading; in France, where regulations have required it for several years, these vapours are treated in vapour recovery units (VRUs) that condense them before returning them to the storage tanks. In addition, top loading stations are gradually being replaced by source loading stations, and petrol storage tanks are increasingly being equipped with floating screens that considerably limit the release of vapours into the atmosphere during the storage phase.

In service stations, vapours emitted during reception and delivery to customers are gradually being recovered, especially in France where regulations have required this for several years.

Support & Services activity

Risks

The refining activity generates atmospheric emissions into the air due to its industrial transformation processes. The main emission sources are furnaces, combustion turbines, boilers and flares.

Shipping generates SO₂ emissions due to the fuels consumed by vessels. However, these emissions have been much lower since the 1st January 2020 entry into force of the Low Sulphur regulation implemented by the International Maritime Organization (IMO 2020), which limits the maximum sulphur content of marine fuels to 0.5% (compared to 3.5% previously).

Limitation measures

The continuous monitoring of the refinery's atmospheric emissions is strengthened by the commissioning of dust and carbon monoxide analysers in the two units generating the highest emissions. As described in the section on Retail & Marketing activities above, measures to collect petrol vapours have also been implemented.

Each year, a refinery smoke control campaign is carried out by an authorised body to validate the results of its self-monitoring.

Regarding the shipping activity, various solutions have been implemented in order to comply with the International Maritime Organization's Low Sulphur regulation:

- Rubis Énergie has fitted one of its eight directly owned vessels (as of 31 December 2022) with a scrubber. This scrubber captures sulphur emissions by washing exhaust fumes. These chimney evacuation filters treat exhaust gas, eliminating up to 90% of sulphur dioxide (SO₂) and fine particles;
- the seven other directly owned vessels, as well as those operated on a time-charter basis by Rubis Énergie, now use low-sulphur fuel oil (0.5% maximum). The availability of this low-sulphur fuel oil in the three activity zones (Caribbean, Europe and Africa) is very satisfactory.

Understanding air pollutants and greenhouse gases

Human activities (transport, accommodation, industry, agriculture) are sources of greenhouse gas emissions and air pollutants. Although they are closely linked and some measures thus aim to reduce both air pollutants and greenhouse gases (for example, improved efficiency of heating systems at the storage sites and optimisation of distances covered by delivery trucks), they should not be confused with one another.

- **Made up of toxic gases or harmful particles, air pollutants have a direct and generally local effect on health and the environment when they exceed certain thresholds.** Over and above human activities, they can also come from natural sources, such as volcanoes (sulphur dioxide). Due to their negative impacts, the release of these air pollutants resulting from human activities is supervised and monitored. Air pollutant emissions measured in the Rubis Storage and Support & Services activities concern:
 - nitrogen oxides (NO_x), which are formed in particular during fossil fuel combustion;
 - sulphur dioxide (SO₂), which arises from several industrial processes and the consumption of fossil fuels containing sulphur;
 - volatile organic compounds (VOC), including benzene, which is found in paint and automotive fuel in particular.
- **Greenhouse gases** occur naturally in the atmosphere and play a vital role in regulating and maintaining the Earth's average temperature (natural greenhouse effect). Contrary to air pollutants, greenhouse gases have little direct effects on health. However, an excess of greenhouse gases released by human activities is largely responsible for global warming (the so-called additional greenhouse effect).

The greenhouse gas released by Rubis' activities is carbon dioxide (CO₂), which is measured (carbon footprint assessment) and subject to reduction measures (see section 4.3.4).

Results

(in tonnes)	NO _x emissions			VOC emissions			SO ₂ emissions		
	2022	2021	2020	2022	2021	2020	2022	2021	2020
Refining (Support & Services)	181	125	185	186	205	182	288	62	240

In 2020 and 2021, atmospheric emissions from refining activities decreased due to the shutdowns of production units resulting from two major scheduled shutdowns for periodic facility maintenance.

RUBIS TERMINAL JV

Risks

The storage activity releases VOCs (volatile organic compounds) from the surface of the stored products which, in accordance with their physico-chemical properties, may vaporise, depending on the storage and handling conditions.

Limitation measures

Collection of petrol vapour in the Rubis Terminal JV's fuel distribution terminals

These vapours are recovered when tank trucks discharge their loads and are piped to vapour recovery units (VRU), where they are condensed into liquid fuel before being reinjected into the storage tanks.

In addition, fuel storage tanks are equipped with floating screens, and loading is performed via source loading

stations that make it possible to minimise VOC discharges into the atmosphere. At chemical product storage sites, toxic product vapours are collected. In addition, any chemical vapours, including VOCs, in the Antwerp and Rotterdam depots are collected and treated.

These two sites were designed from the start to collect and treat all vapours, including VOCs, found above liquids and pushed out of tanks during transfers.

Reduction of energy consumption in storage terminals

As the energy consumed by the storage terminals is derived from the same source as the energy generating CO₂ (pumps and boilers), the actions taken by the Rubis Terminal JV to reduce energy consumption at sites, in terms of both existing and new heating systems, are described below (section 4.2.3.2).

Results

(in tonnes)	NO _x emissions			VOC emissions		
	2022	2021	2020	2022	2021	2020
Rubis Terminal JV	4.9	10.5	11	290	269	311
• of which Group share	2.8	5.8	6.1	159.5	148	171

In the storage sites, the low values calculated once again show a very limited NO_x impact from this activity in 2022, with a decrease partly due to changes in scope vs the previous year (4.5 tonnes).

In terminals where boilers are installed, i.e., chemical and mixed terminals, NO_x emissions are declining due to the start-up of gas boilers in Strasbourg and Rouen to replace heavy oil-fired boilers.

Concerning VOCs, the reduction of more than 13% recorded in 2021 reflected the full-year operation of a more efficient

vapour recovery unit treatment system for petrol emissions at the Rouen site. There was an increase of 7.8% in 2022, which is explained by a structural increase in petrol activities at the terminals of 21% in France over the same period.

SO₂ are not measured by the Rubis Terminal JV because the fuels used are either gas or standard low-SO₂ liquid fuels (mandatory in the EU countries where the terminals are located).

4.2.2.3 Use of resources

In line with principles of the good governance of its activities, Rubis makes optimum use of the natural resources needed by its value chain, which is a key component of its corporate responsibility (section 4.2.2.3.1). Moreover, although the Group produces little waste, it ensures that the quantities of waste are limited and that waste is recycled (section 4.2.2.3.2).

4.2.2.3.1 PRESERVATION OF WATER RESOURCES / NFIS /



Risks

The Retail & Marketing activity does not require recurrent and significant use of water for industrial processes. Water is consumed in only very limited quantities for fire drills and periodic storage tank requalification and for cleaning and the requalification of LPG cylinders at cylinder filling plants.

The Support & Services activity (refining) consumes water mainly through its industrial transformation processes (boilers, etc.) and for its facilities' fire-fighting systems.

Water consumption of **Rubis Terminal JV** mainly comes from fire drills carried out to test the effectiveness of the systems in place, the needs for the dosing of liquid fertilisers and urea-based solutions for the reduction of NO_x from diesel engines. This usual consumption is increased by occasional water requirements for hydraulic testing (resistance tests) for new tanks.

Measures to reduce water consumption

In the activities with the highest level of consumption (refining and the Rubis Terminal JV), significant efforts are made to reduce the net consumption of freshwater:

- **the use of rainwater** for refilling fire reservoirs and for dosing fertiliser. The facilities concerned have dedicated collection tanks;
- **treating wastewater** enables the Rubis Terminal JV storage sites to report a higher volume of treated wastewater than the volume of freshwater used, as rainwater collected on sealed surfaces is also treated. In the refinery, all process water is collected and treated before being discharged into a modern residual water treatment unit. Systematic sampling and regular analyses make it possible to check that the water discharged after the various treatment stages complies with regulatory standards;
- **an investment project for industrial water production facilities** at the refinery through the desalination of sea water (based on the principle of reverse osmosis) will significantly reduce the net consumption of freshwater. This project, called Green Water, commissioned in 2022, should make it possible to cover all the refinery's industrial water requirements (capacity of 30 m³/h for demineralisation lines and 5 m³/h for service water requirements). Ultimately, it should enable the refinery's city water consumption to be reduced by 80%. Domestic water (sanitary, kitchen) will continue to be supplied through the drinking water network.

Results

(in m³)	Water used*			Water treated*		
	2022	2021	2020	2022	2021	2020
Refining (Support & Services)	252,906	150,104	174,014	88,319	65,417	92,209
Rubis Terminal JV	180,309	308,370	305,640	386,655	465,692	471,056
• of which Group share	99,170	169,604	168,102	212,660	256,131	259,081

* Used and/or treated water can be either standing (reservoirs or lakes) or flowing water (rivers) above ground, sea water, groundwater or water from the distribution network supplying the site. Discharged water is extracted water, as well as rainwater, which explains the higher volume of water treated than water used for the Rubis Terminal JV.

Water consumption related to the refinery remained below the regulatory threshold prescribed in the prefectural order authorising the operation of the refinery.

Since 2018, the Rubis Terminal JV's water consumption has been optimised. The ending of significant water table abstraction, which was designed to protect groundwater against surface pollution following the clean-up of a large site, made it possible to reduce water consumption by 98% since 2013.

4.2.2.3.2 WASTE MANAGEMENT



Given their respective business lines, the Group's activities generate little hazardous waste and, therefore, there is no significant risk in this regard. The main sources of waste generation are storage and refining activities. In order to minimise its impact, to the extent possible, the Group limits the quantity of waste generated and recycles such waste. Subsidiaries ensure that residual waste that cannot be recycled is treated as required by applicable standards.

Analysis by activity

The Retail & Marketing activity generates virtually no hazardous waste, other than in the storage activity. The only hazardous waste produced is mainly made up of residues and sludge, which are treated as required by locally applicable standards, as outlined below in respect of the storage activity.

The Support & Services activity (refining only) produces hazardous waste, mainly petroleum product residues and sludge (which are recovered when waste water from tanks and/or separators is treated during maintenance work) and chemical products.

On a like-for-like basis, the 8% increase in treated water corresponds to a high level of rainfall in France, not recorded since 1959. The 30% reduction in water used corresponds to a year with less commissioning of new tanks than the previous year, generating less water consumption associated with hydraulic tests.

The Rubis Terminal JV (provision of bulk liquid storage capacity) generates three types of hazardous waste (construction and demolition waste are not taken into account):

- **waste generated by the subsidiaries' regular activity**, particularly following maintenance and inspection, which is mainly comprised of residues and sludge removed when tanks (and/or separators) are cleaned during maintenance operations or when switching between products. Like all other waste, residue and sludge removal is systematically registered, declared and sent to authorised recycling or destruction plants. Residue and sludge with combustion power are usually sent to authorised thermal recovery centres;
- **goods not delivered to customers**, which can sometimes only be removed from sites as "hazardous waste" from an administrative point of view;
- **waste from clean-up work**, particularly from certain recently acquired sites that contain legacy pollution that predates Rubis Terminal JV's arrival.

Measures to limit and recycle waste

Innovative procedures and tools have been implemented to limit the production of both hazardous and non-hazardous waste. To this end, the entities are continuing their efforts to increase the number of sites using thermal recycling networks, when such treatment facilities are available nearby.

A continuous inventory of hazardous materials and substances is regularly reported to the local authorities (in the European Union). A register is kept available for

inspection by the Regional Directorates of Environment, Planning and Housing (DREALs) at each French site.

The Rubis Énergie refinery and the Rubis Terminal JV have also established a system of systematic sorting of non-hazardous industrial waste, which corresponds to all waste that is neither hazardous nor inert.

This sorting is performed through the use of suitable and appropriately positioned containers on each site.

Results

(in tonnes)	Volumes of hazardous waste			Waste recovery rate		
	2022	2021	2020	2022	2021	2020
Refining (Support & Services)	69	144	255	94%	73%	59%
Rubis Terminal JV	2,964	3,032	2,314	51%	38%	22%
• of which Group share	1,630	1,668	1,273	NA	NA	NA

In 2021 and 2022, volumes of reported hazardous waste related to the refining activity were down significantly compared to 2020. This significant change is mainly attributable to the fact that a significant volume of chemical products had to be destroyed in 2020 in the context of the dismantling of the Sulférox 17 unit, which had also generated 400 tonnes of non-hazardous waste (concrete, waterproofing, stainless steel, ferrous metals). Waste recycling consists of reusing petroleum sludge and other waste soiled by petroleum products as fuel or another

energy source. Oils are regenerated for reuse. Metals and metallic compounds are recycled or recovered.

The production of waste classified as hazardous at the Rubis Terminal JV sites was stable at constant scope. The significant increase in the waste recovery rate is explained by an additional management effort made on several sites, as well as by an exceptional event: the washing of several molasses tanks at the Rouen site, from which the waste at the bottom of the tanks was able to be fully recovered.

Plastic Odyssey: a round-the-world expedition to fight plastic pollution

Rubis Énergie supports and sponsors the Plastic Odyssey project, which is sailing around the world on a ship that is an ambassador for solutions to fight plastic pollution at sea.

The objectives of this expedition are to:

- raise awareness of plastic waste reduction and waste recycling, particularly in emerging countries;
- circulate know-how and technologies throughout the world;
- produce conferences, films and photo reports during the expedition.

Plastic Odyssey has developed open source, low-cost plastic recycling technologies to treat waste generated on land before it ends up at sea. The aim of these machines is to economically develop the plastic waste treatment sector: to create jobs while fighting against pollution at the source.

In order to test these solutions and share them in the countries most affected by pollution, these machines have been taken aboard the *MV Plastic Odyssey*, a 40-metre former oceanographic research vessel, for a three-year expedition to Africa, South America and South-East Asia. This anti-pollution ambassador is promoting solutions to drastically reduce waste production and build a more sustainable future.

4.2.2.4 Biodiversity

In 2022, Rubis conducted a preliminary analysis of environmental risks from a biodiversity perspective within Rubis Énergie (Retail & Marketing and Support & Services). This specific study of the biodiversity challenges will enable it to fine tune its assessment in 2023 and define the priorities of its action plan to respond to them as well as any additional management measures.

This initial inventory was carried out on the basis of interviews with seven representatives of entities, followed by the sending of a questionnaire to each business unit. The Encore (Exploring Natural Capital Opportunities, Risks and Exposure) database developed by Natural Capital Finance Alliance in partnership with UNEP-WCMC (UN Environment Programme – World Conservation Monitoring Centre) was used to identify marine and land biodiversity hotspots as well as water-stressed areas located close to our sites. This approach has made it possible to raise both the operational teams' awareness of biodiversity challenges and to identify the most exposed subsidiaries and sites in the Retail & Marketing and Support & Services activities.

In general, the Rubis Group's main direct impacts on biodiversity are related to site operations and the shipping

and ground transport necessary for the activities (atmospheric, soil and water emissions; energy consumption; noise and light pollution).

Some sites are located in areas that are more sensitive in terms of land or marine biodiversity or water stress.

The Group's climate strategy and the actions it implements to reduce the environmental impact of its activities also aim to protect biodiversity.

For example, the SARA refinery, the entity that consumes the most water for its industrial transformation processes, is not located in an area of water stress. Nevertheless, it has implemented the Green Water project, enabling it to desalinate and demineralise seawater using reverse osmosis, and thus take less potable water from the public network so that the population can benefit from it. This water, once treated and resalinated to a level close to that of seawater, can then be discharged.

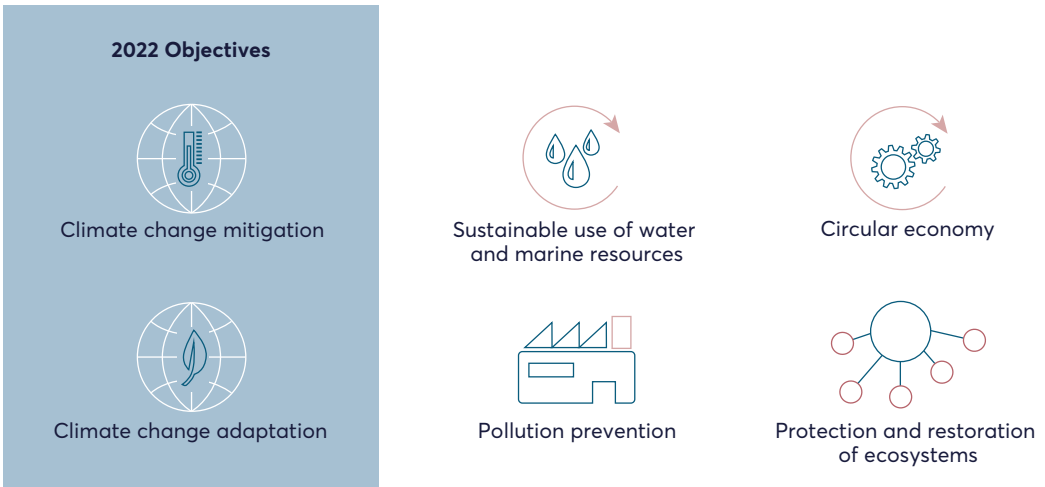
The SRPP (Réunion Island) has implemented measures to reduce the light pollution from its depot by reorienting the lighting to limit the dazzling of Mascarene petrels, an endemic species of critically endangered birds.

4.2.2.5 European Green Taxonomy

4.2.2.5.1 PRESENTATION OF THE MAIN PRINCIPLES OF THE TAXONOMY REGULATION

The European Green Taxonomy, provided for by the EU Taxonomy Regulation 2020/852 of 18 June 2020, is a system for classifying economic activities considered as environmentally sustainable by the European Commission on the basis of scientific criteria. This regulation is the result of the action plan for sustainable finance launched in 2018 by the European Commission in order to direct capital flows towards the activities that it has identified as priorities

according to their ability to contribute to one of the following six environmental objectives (see diagram below). An activity is considered "eligible" when it is described in the corresponding delegated regulations (concerning the two climate objectives, in Annexes I and II of Delegated Regulation EU 2021/2139 of 4 June 2021 published on 9 December 2021).



An activity can contribute to both of the European Taxonomy's climate objectives:

- through its intrinsic performance (for the Rubis Group, for example, the production of electricity from renewable sources);
- when it directly enables other sustainable activities. It is then qualified as an enabling activity; or
- if it promotes the transition to a carbon neutral economy and cannot be replaced by technically and economically feasible low-carbon alternatives. It is then qualified as transitional. This is the case, for example, for transport activities.

Then, to be considered sustainable within the meaning of the taxonomy, an "eligible" activity must be "aligned". To do this, it must be demonstrated that the said activity meets the requirements set out in Article 3 of the Taxonomy Regulation:

- it makes a substantial contribution to one of the six environmental objectives, *i.e.*, it meets the technical criteria specified in the delegated regulations;
- it does not harm the other five environmental objectives (principle of Do No Significant Harm);
- it complies with minimum safeguards.

In accordance with the Taxonomy Regulation and delegated regulations, three indicators based on the Group's consolidated financial statements are published: the share of revenue, capital expenditure ("capex") and operating expenditure ("opex"), together with economic activities considered, on the one hand, as eligible and, on the other hand, as aligned with the technical criteria of the taxonomy, concepts detailed in section 2 below.

For the second year of application of these provisions, non-financial companies must publish:

- the share of their eligible and ineligible activities under the taxonomy for the three aforementioned indicators;
- the share of their aligned and non-aligned activities under the taxonomy for the three aforementioned indicators;
- the indicators relating to data for the financial year 2022.

In this context, a review of Rubis' activities in the light of the European Green Taxonomy was carried out in order to determine the share of the Group's activities eligible under the European Green Taxonomy. In accordance with the Taxonomy Regulation, the indicators to be published relate to consolidated financial data. Consequently, the storage activities of the Rubis Terminal JV, an equity associate in Rubis SCA's financial statements, are not included in Rubis' taxonomy indicators.

The Group has adopted assumptions and methods as described in this document when they are material and which may change depending on the interpretations and Frequently Asked Questions published by the European Commission.

4.2.2.5.2 ANALYSIS OF THE GROUP'S ACTIVITIES WITH REGARD TO THEIR ELIGIBILITY AND ALIGNMENT

Eligibility

The assessment of Rubis' eligible activities was carried out on the basis of a detailed analysis of its various activities with regard to the activities described in the Taxonomy Regulation. This analysis was carried out jointly by the CSR and Consolidation teams, with support from the HSE and Climate/New Energies teams. Rubis' accounting plans were studied in order to establish an accounting methodology.

As of 31 December 2022, the Group's activities were as follows:

- **Retail & Marketing** of fuels, liquefied gas (LPG) and other types of products such as bitumen (Rubis Énergie);
- **Support & Services**, which includes the supply, transport and service activities carried out for the needs of Retail & Marketing activities (Rubis Énergie);
- **Photovoltaic Electricity Production** *via* ground-based solar power plants (Rubis Photosol). The Group manages the entire cycle of photovoltaic projects (financing, construction and operation of power plants);
- **Bulk Liquid Storage** (Rubis Terminal JV). As this joint venture is accounted for using the equity method in Rubis' financial statements, no information is reported in the Group's taxonomy indicators.

During its taxonomy analysis, the Group identified two activities, from among those listed by the European Regulation as being fully eligible under the first applicable objective of climate change mitigation:

- **activity 4.1 – Electricity generation using solar photovoltaic technology:** the Group has an activity, *via* Rubis Photosol, for the construction and operation of photovoltaic power plants in France on its own behalf and that of third parties;
- **activity 7.6 – Installation, maintenance and repair of renewable energy technologies as part of its construction and operation of solar power plants:** the Group, *via* Rubis Photosol, performs technical and material maintenance activities for its own network and on behalf of third parties through maintenance contracts.

The analysis revealed the absence of eligible revenue for the rest of the Group's activities (in particular in connection with its Retail & Marketing activities not mentioned in the Regulation). The analysis of eligibility for investments and operating expenses was therefore focused on "individual measures":

- **activity 4.1 – Electricity generation using solar photovoltaic technology:** the Group supports an investment policy for the installation of photovoltaic panels on roofs in its Retail & Marketing subsidiaries (*via* its subsidiary Rubis Énergie, in the French Antilles and Jamaica);

- **activity 4.10 – Storage of electricity:** the Group is developing (via its subsidiary Rubis Énergie, as part of the RSB project) photovoltaic energy production infrastructures coupled with hydrogen electricity storage capacities to ensure continuity of energy distribution;
- **activity 5.1 – Construction, extension and operation of water collection, treatment and supply systems:** the Group (via its subsidiary Rubis Énergie) operates a seawater desalination unit at the SARA refinery (in Martinique), which enables the autonomous production of fresh and demineralised water for the refining process and any water needs on the island. This consists of an osmosis unit and reduces the pressure on the potable water network;
- **activity 6.5 – Transport by motorbikes, passenger cars and light commercial vehicles:** for the head office and its subsidiaries, the Group has its own vehicles as well as long-term leases for light commercial vehicles;
- **activity 7.2 – Renovation of existing buildings:** the Group carried out renovation work on buildings (excluding storage and distribution facilities for fossil-based products);
- **activity 7.7 – Acquisition and ownership of buildings:** the Group, within the meaning of the Regulation (including the inclusion by IFRS 16 of its long-term leases) has the use and ownership of its buildings for administrative and/or operational use, for all its activities in France and abroad.

In addition, as of 31 December 2022, non-material capital expenditure (less than €1 million) was committed for activities 1.2, 6.10, 6.15, 7.3 and 7.6.

It should be noted that in 2022, as in 2021, the Rubis Group has considered the shipping of fuels and bitumen as ineligible.

Delegated Regulation EU 2021/2139 explicitly states that fossil fuel transport activities cannot be considered as aligned under the substantial contribution criterion of the climate change mitigation objective. The transport of bitumen, which is not a fuel but a derivative of crude oil, is

not directly referred to in the texts. However, for the sake of consistency with the taxonomy spirit and given the non-material nature of this activity, Rubis has treated this activity in the same way as fossil fuel transport. Therefore, it is not included at this stage in eligible activities. The Rubis Group has deemed it more prudent not to present as an eligible activity an activity that structurally, according to the text, could never be aligned.

As a result, in line with this interpretation, investments made and operating expenses for facilities dedicated to the storage and distribution of products from fossil sources (petroleum products, liquefied gas, bitumen) are also excluded by the Group from eligible activities.

It should be noted that the Group's eligible capex for the financial year 2022 amounted to €423 million out of a total of €679 million. The eligibility ratio thus stands at 62% of consolidated capex. This high ratio is explained by the acquisition of Photosol on 1st April 2022, for which the fair value of non-current assets is included for €417 million including right-of-use assets. The acquisition of Photosol meets the Group's objective to integrate low-carbon energy production into its activities. However, this change in scope cannot be considered for the purposes of the 2023 taxonomy reporting.

Alignment

Description of the method used for the substantial contribution and DNSH criteria

In order to assess the alignment of its activities, Rubis SCA and the subsidiaries concerned systematically verified compliance with the criteria of substantial contribution to climate change mitigation as well as DNSH (Do No Significant Harm).

The analysis carried out demonstrated the alignment of its operations for activities 4.1 relating to the generation of electricity using photovoltaic technology (via Rubis Photosol and Rubis Énergie for individual measures) and 7.6 relating to equipment installation and maintenance (via Rubis Photosol):

BUSINESS SEGMENT ENERGY

Taxonomy activity Activity 4.1 – Electricity generation using solar photovoltaic technology

TECHNICAL SCREENING CRITERIA

Substantial contribution to climate change mitigation	Comments on alignment	Opinion on alignment for the entity
Mitigation criterion: the activity consists of producing electricity using solar PV technology.	For the company, this means qualifying the activity that is carried out.	The installation and operation of PV solar panels meets the definition of the substantial contribution criterion. Proof of alignment: purpose of contracts signed with third parties.
Do No Significant Harm	Comments on alignment	Opinion on alignment for the entity
DNSH 2 – Climate change adaptation: This activity complies with the criteria set out in Appendix A of the Delegated Acts.	The company must demonstrate that it has carried out a study to identify and anticipate the risks related to climate hazards.	The Rubis Photosol and Rubis Énergie subsidiaries conducted a physical risk analysis for each of the sites declared as eligible and aligned. Proof of alignment: Risk analysis and adaptation plan.
DNSH 3 – Sustainable use and protection of water and marine resources: None.	-	-
DNSH 4 – Transition to a circular economy: The activity consists of assessing the availability and, as far as possible, using equipment and components that are highly durable and recyclable and that are easy to dismantle and refurbish.	The company must demonstrate the existence of a sourcing strategy and its implementation, as far as possible.	Projects to install solar panels at the Rubis Énergie subsidiary's service stations and Rubis Photosol's solar power plants are accompanied by actions to promote the sustainability and recyclability of PV panels (sourcing strategy, environmental tax, commitment on the dismantling of PVs, business cases, etc.) Proof of alignment: Profitability and sustainability analysis, sourcing strategy, payment of environmental tax.
DNSH 5 – Pollution prevention and control: None.	-	-
DNSH 6 – Protection and restoration of biodiversity and ecosystems: This activity complies with the criteria set out in Appendix D of the Delegated Acts.	The company must demonstrate that it has carried out a study on its impacts within the ecosystems. Compliance is automatic in France.	The conduct of an environmental impact study is governed by French law. In other jurisdictions, specialised firms are commissioned to carry out impact studies. Proof of alignment: Administrative authorisation for construction, impact studies.

BUSINESS SEGMENT ENERGY		
Taxonomy activity Activity 7.6 – Installation, maintenance and repair of renewable energy technologies		
TECHNICAL SCREENING CRITERIA		
Substantial contribution to climate change mitigation	Comments on alignment	Opinion on alignment for the entity
Mitigation criterion: The activity consists in one of the following individual measures, if installed on-site as technical building systems: (a) installation, maintenance and repair of solar photovoltaic systems and the ancillary technical equipment; (...)	For the company, this means qualifying the activity that is carried out.	The installation and maintenance of PV solar panels meets the definition of the substantial contribution criterion. Proof of alignment: Purpose of contracts signed with third parties.
Do No Significant Harm	Comments on alignment	Opinion on alignment for the entity
DNSh 2 – Climate change adaptation: This activity complies with the criteria set out in Appendix A of the Delegated Acts.	The company must demonstrate that it has carried out a study to identify and anticipate the risks related to climate hazards.	The Rubis Photosol subsidiary conducted a physical risk analysis for each of the sites declared as aligned. Proof of alignment: Risk analysis and adaptation plan.
DNSh 3 – Sustainable use and protection of water and marine resources: None	-	-
DNSh 4 – Transition to a circular economy: None	-	-
DNSh 5 – Pollution prevention and control: None	-	-
DNSh 6 – Protection and restoration of biodiversity and ecosystems: None	-	-

The other activities were not considered aligned with regard to the DSNH or the substantial contribution criteria.

Description of the method used for minimum safeguards

The analysis of compliance with minimum safeguards was carried out at the Rubis Group level by the Group CSR & Compliance Department, in conjunction with the CSR Advisors of the various entities.

The Group's compliance with the minimum safeguards criterion is based on Rubis' commitment to the United Nations Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, as well as the Group's commitment to respect the principles and rights set out in the eight fundamental conventions mentioned in the declaration by the International Labour Organization.

The procedures that the Group puts in place to comply with these commitments include, among other things, membership of the UN Global Compact, the mapping and publication of risk factors inherent to Rubis' activity and the implementation of a Group alert mechanism.

These procedures will be strengthened for 2023 with , in particular, the definition of an action plan based on the initial conclusions of the human rights risk mapping and the launch of work on responsible purchasing with the implementation of a dedicated system to monitor the mitigation measures taken by the Group and its suppliers.

The Group's policies concerning the fight against corruption (in line with the Sapin II law), tax evasion and respect for human rights are presented in section 4.5.1. The measures aimed at strengthening the Group's approach to human rights within the value chain are inspired by the French duty of vigilance (to which the Group is not legally subject).

4.2.2.5.3 TAXONOMY INDICATORS

Revenue

Definition of the indicator

As of 31 December 2022, the amounts corresponding to eligible activities (A.2), i.e., eligible revenue, correspond to almost the entire revenue of the subsidiary Rubis Photosol, for an amount of €32 million.

The amounts corresponding to aligned activities (A.1), i.e., eligible and aligned revenue, also correspond to almost the entire revenue of the Rubis Photosol subsidiary.

The denominator corresponds to the Group's consolidated revenue (i.e., €7135 million).

Results

The results detailed using the regulatory tables are presented in chapter 8, section 8.5. Overall, 0,45% of Group revenue is eligible and aligned.

Capital expenditure (capex)

Definition of the indicator

As of 31 December 2022, the breakdown of the numerator of the eligibility ratio (A.2), i.e., Rubis' eligible capex, is as follows: the Rubis Photosol subsidiary's almost entire eligible capex since 1st April 2022 represents €413 million for activity 4.1 and €1 million for activity 7.6.

In addition, activity 7.7 generated capex of €3 million.

The increase in non-current assets related to the acquisition of Rubis Photosol on 1st April 2022 is also included in the Group's eligible capex for activity 4.1, in the amount of €396 million (value as of 1st April 2022).

The amounts corresponding to aligned activities (A.1), i.e., eligible and aligned capex, correspond in particular to:

Rubis Photosol's capex for activities 4.1 and 7.6.

It should be noted here that 100% of the eligible capex for activities 4.1 and 7.6 of the Rubis Photosol subsidiary are aligned with the technical criteria of the taxonomy.

The total capital expenditure used as the denominator for the calculation of the capital expenditure indicator for the taxonomy is €679 million and corresponds to increases in property, plant and equipment and intangible assets over the period, including increases in IFRS 16 right-of-use assets and business combinations. It can be reconciled with the figures shown in notes 4.1 and 4.3 to the financial statements as follows:

(in thousands of euros)	Changes in scope	Acquisitions	Reclassifications	Total
Note 4.1.1 Property, plant and equipment	316,845	224,138	(9,836)	531,147
Note 4.1.2 Right-of-use assets	51,360	42,348	-	93,708
Note 4.3 Intangible assets	46,683	7,427	205	54,315
TOTAL	414,888	273,913	(9,631)	679,170

Results

The results detailed using the regulatory tables are presented in chapter 8, section 8.5. In summary, 62.3% of the Group's capex were eligible and 61% were aligned in 2022.

Operating expenses (opex)

Definition of the indicator

Analysis of opex led to the identification of flows for the activities of Rubis Photosol and Rubis Énergie. For Rubis Photosol, opex related to eligible and aligned activities are not material. The maintenance of the fleet is internalised and the opex mainly consist of the purchase of spare parts and repairs. For Rubis Énergie, the opex identified by the regulation and eligible under "individually sustainable measures" are not material. They mainly relate to non-capitalised research and development costs and short-term leases.

Results

Taking into account the analysis carried out on the opex within the meaning of the taxonomy, these represent a maximal amount of €165 million, which is not material at the Group scale. The share of eligible and aligned operating expenses under the European Green Taxonomy is deemed nil.

The results detailed using the regulatory tables are presented in chapter 8, section 8.5.

4.2.2.5.4 ADDITIONAL INFORMATION

The oil and gas sector plays a key role in terms of access to energy, particularly in many of the regions where Rubis

operates and where a large portion of the population does not have this access to energy. The need to reduce greenhouse gas emissions at the global level, reflected in the European Green Taxonomy, is well integrated by Rubis, which is investing in the energy transition and in the carbon reduction and diversification of its historical activities.

In addition, in June 2021, the Group acquired an 18.5% interest in HDF Energy (hydrogen-electricity) as part of a strategic partnership. Due to the nature of the transaction (non-controlling interest through the acquisition of shares for €78.6 million), it cannot be taken into account in the capex as defined in the taxonomy, although it corresponds to an eligible activity (activity 4.1 Electricity production using solar photovoltaic technology): the power plants developed aim to provide continuous or on-demand electricity from renewable energies (wind or solar), combined with high-power fuel cells to remedy the intermittent problems of renewable energies.

Since 2017, Rubis has collaborated with HDF Energy on the West Guyana Power Plant (CEOG), of which SARA holds 30%. CEOG is an innovative plant comprising solar panels, batteries and storage of hydrogen produced with the assistance of electrolyzers. The plant will make it possible to supply the equivalent of 10,000 households with stable, guaranteed and non-polluting electricity once commissioned, which is scheduled to take place in mid-2024. A similar project is being studied in Barbados. It will help the Barbadian State achieve its target of 100% renewable energy by 2030.

In general, the development method of these projects, usually a joint venture, will not allow them to be counted in the taxonomy indicators and, therefore, to value the Group's diversification towards less carbon-intensive activities, including when the activities are eligible or even aligned.

Virtuous investment spending

Alongside its taxonomy reporting, Rubis Énergie defined and implemented **its own reference framework of capex identified as virtuous in terms of their contribution to the fight against climate change. These capital expenditures are outside the scope of the European Green Taxonomy.** The main criteria used to identify virtuous capex from an environmental point of view are decarbonisation (reduction of CO₂ emitted) and the ability to promote the energy transition. While these expenses represented a limited amount in 2021, they increased in 2022 and will be subject to specific reporting from 2023.

Among these capex that are virtuous but not eligible at this stage, we can note solarisation projects (facilities for the production of electricity from photovoltaic systems, with or without batteries) on the roofs of buildings or service stations, which are not included at this stage in the eligible capex (see section 4.2.2.5.3, paragraph capex). The electricity produced, consumed by users or resold, not only reduces CO₂ emissions, but also achieves savings in electricity consumption. For example, as of 31 December 2022, 10 subsidiaries have installed photovoltaic panels on their buildings.

A more detailed presentation of the operating actions implemented to control and reduce the carbon footprint of the Group's activities and to diversify its activities can be found in section 4.3 "Combating climate change" of this chapter.

Rubis Terminal JV

The Rubis Terminal JV specialises in the storage and handling of bulk liquid and liquefied products, such as fuels, chemical and agrifood products. It has been **consolidated using the equity method in its financial statements since 30 April 2020** and is 55%-owned by Rubis SCA. It cannot therefore be included in the Group's taxonomy indicators, in accordance with Regulation EU 2020/852. The Rubis Terminal JV was nevertheless analysed as a whole, given that the joint venture is included in the Group's Non-Financial Information Statement. In this context, a review

of the activities of the Rubis Terminal JV in the light of the European Green Taxonomy was carried out in order to determine the share of the company's activities eligible under the European Green Taxonomy.

No revenue-generating activity of the Rubis Terminal JV has been identified as eligible under the European Green Taxonomy, given the partial and specific consideration of storage activities within the Delegated Climate Regulation. The taxonomy does not necessarily include all the activities constituting the complete production chain of the finished product, which alone may be eligible. The potentially eligible activity of the Rubis Terminal JV would have been the storage of raw materials for the production of biofuels or other products and energy. However, after a more detailed study of the texts and exchanges with the teams of the Rubis Terminal JV, it became clear that storage activities not explicitly described in the texts of the European Green Taxonomy are not eligible activities. Discussions with professional storage organisations are underway to clarify the role of storage activities.

It is important to highlight the essential contribution of the Rubis Terminal JV in the value chain of the following products, which are eligible under the taxonomy, thanks to its storage activity for the manufacturing industry:

- chemical product storage activity: this represented 40.9% of the revenue of the Rubis Terminal JV as of 31 December 2022, with these products then being used in various industries (3.11 carbon black activity, 3.16 nitric acid activity, 3.17 plastics in primary form activity, as defined in Delegated Regulation 2021/2139);
- energy and biofuel storage activity: the biofuel storage activity (activity 4.13 as defined in Delegated Regulation 2021/2139) represented 12% of the revenue of the Rubis Terminal JV as of 31 December 2022;
- blending activity allowing the marketing of additive products ready for consumers: the Rubis Terminal JV is involved, in particular, in blends that make it possible to include a portion of regulatory biofuel in fuels sold (activity 4.13 of Delegated Regulation 2021/2139).

4.2.3 Operating in a safe environment / NFIS /

Due to the nature of their activities, the safety of operations is a constant concern for Rubis Énergie's and the Rubis Terminal JV's HSE teams. **Rubis Énergie operates 16 industrial sites that are classified as Seveso sites (high and low threshold, including a refinery) in the European Union**, as well as 49 similar sites located outside the European Union (petroleum or chemical product storage sites and LPG cylinder filling plants). The Rubis Terminal JV operates 27 classified industrial sites as of the date of publication of this document.

The Group's HSE teams are committed to a continuous process aimed at improving measures and procedures relating to the security of property and the safety of people, particularly employees but also external service providers, customers and local residents. **Strict industrial health and safety standards are applied by all Group subsidiaries.** Efforts are focused on the safety of the facilities, so as to prevent major accidents, and on personal safety, by preventing workstation accidents and the safety of customers and local residents from being compromised.

The Group continues to invest regularly to upgrade its facilities to comply with the strictest environmental and safety standards and to guarantee that people and their environment are protected (air, water, soil and urban areas located near its facilities). These investments guarantee the

reliability of its operations and, as a result, the Group's competitiveness. In 2022, they amounted to €109 million for Rubis Énergie (compared to €133 million in 2021). The Rubis Terminal JV invested €27 million in 2022.

What is a Seveso site?

Generally, all industrial or agricultural facilities liable to create risks or cause pollution or nuisances for local residents are qualified as installations classified for the protection of the environment (ICPE). Some of these ICPEs are Seveso classified since their operation in France is subject to authorisation by the prefect. Indeed, when an industrial site handles hazardous products, an accident can quickly have serious consequences.

Following an industrial accident that occurred in 1976 at a chemical plant in Italy, the European public authorities adopted a directive known as the Seveso Directive, named after the town near the plant where the accident occurred, to prevent major industrial accidents. The European Seveso Directive, which has been amended three times since it was adopted in 1982, classifies industrial facilities according to the level of danger they represent in case of an accident. The classification, based on the quantity of hazardous products stored, is at either a "high threshold" or "low threshold" Seveso site. The prevention measures to be implemented by operators are adapted to the type of site. They are based on a regularly updated hazard study.

4.2.3.1 Operational safety: target of zero major industrial accidents / NFIS /



Most of Rubis Énergie's and the Rubis Terminal JV's facilities in France and the rest of Europe (storage sites and LPG cylinder filling plants) are subject to the Seveso regulation and consequently must comply with very strict environmental protection and industrial safety standards (regular risk assessments, adoption of measures to prevent and, where necessary, manage the consequences of potential accidents). These standards are being phased in gradually by non-European subsidiaries while taking into account the constraints of the local environment.

RISKS

Risk mapping is performed by the subsidiaries' Management with the support of the heads of Retail & Marketing, industrial facilities and of the shipping activities (see chapter 3, section 3.2.3.2).

With regard to operational safety, the main risk is the occurrence of a major accident in industrial or distribution facilities (service stations), including an explosion or fire that could cause damage to people, the environment and/or property, etc.

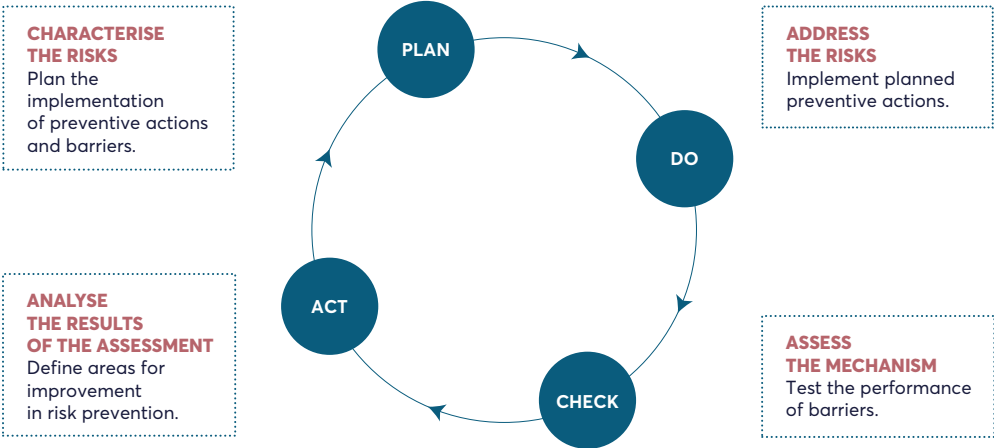
MEASURES TO LIMIT INDUSTRIAL RISKS AND GUARANTEE OPERATIONAL SAFETY

In order to reduce the industrial risks inherent in its activities (regardless of whether they are subject to European regulations) and in accordance with the "zero major industrial accidents" target the Group has set for itself, QHSE teams work on the following factors.

Improving preventive maintenance of facilities and employees' risk perception

Rubis Énergie and the Rubis Terminal JV continued to roll out their respective preventive facility maintenance tools (computer assisted maintenance management). Once the relevant information has been loaded into the database, these systems allow monitoring and preventive maintenance work to be planned. Its other functions are to catalogue all past maintenance operations so as to create a servicing history, anticipate spare parts requirements, assess maintenance costs in connection with the management of machinery equipment, and prepare budget estimates.

In addition, Rubis Énergie is gradually involving its employees in a continuous effort to improve the safety of facilities by respecting the **Plan – Do – Check – Act** rule.



Moreover, to improve understanding of the systems and the assessment of the risks relating to Seveso facilities, the Rubis Terminal JV has promoted the use of Piping and Instrument Diagrams (PID). PIDs are a system for presenting process functions, which is used to catalogue a site's pipes, tanks and pumps and to harmonise disparate existing blueprints by replacing them with a single reliable plan that can be duplicated on all sites.

Use of lesson learned procedures

The organisational arrangements of these procedures vary according to the activities.

Rubis Énergie uses its extranet to circulate to all its subsidiaries a document base that includes lessons learned. Recommendations can then be made after analysing accidents and can include adapting organisational measures, updating risk prevention procedures, reinforcing employee training activities, facilities modifications or improving equipment monitoring.

The procedure for reporting incidents, near misses and accidents by subsidiaries, which gives rise to lessons learned, is an excellent indicator of the safety culture prevailing in the various entities. It is also an important aspect of the continuous improvement process. For example, between 2021 and 2022, Rubis Énergie was able to circulate more than 20 lessons learned reports to all its subsidiaries, detailing the description, consequences and main causes of each incident and the main recommendations to be put in place to prevent such incidents from happening again. These reports covered a wide variety of areas, including the inspection of liquefied

gas cylinders before filling, securing containers on trailers, works at service stations, loading tank trucks at depots, fuel deliveries to customers, etc.

The Rubis Terminal JV has developed safety-sharing software (Rubis Terminal Operational Platform) to facilitate and encourage the collection and exchange of safety-related information. This interface collates incident and near-incident reports at each terminal and comes with a lesson learned management module and a report module and dashboard. It is used by local QHSE teams and promotes interactions between sites in view of limiting the repetition of risky events.

Prevent and control technological risks: the preventive safety mechanism at facilities

Prevention of technological risks is ensured through regular inspections of the Group's sites and subsidiaries by the Industrial and Technical Departments of Rubis Énergie and the Rubis Terminal JV. They are detailed in reports prepared in consultation with the heads of the relevant facilities and the heads of the relevant subsidiaries in order to analyse potential anomalies and/or shortcomings and to take steps to remedy them. Within Rubis Énergie, 27 subsidiaries were audited in 2022.

In addition to inspections and lessons learned, each entity implements preventive measures that are appropriate for its own activity, including:

- **internal inspection programmes** for all liquefied gas and fuel bulk storage tanks, which are generally scheduled every 10 years or as required by international standards;

- **installation and maintenance of safety equipment** such as gauges, level alarms, fire defences, gas detection systems, etc.;
- **systematic verification** that all substances stored, whether existing or new, have been authorised in advance by an operating permit if required;
- **systematic analysis and management of risks identified in the Material Safety Data Sheet (MSDS) and systematic training of staff** on the handling of potentially hazardous products;
- pursuant to Seveso regulations, **a procedure to prevent major accidents** at French facilities involving hazardous substances, and supplemented by “Instrumented Risk Control Measures” (IRCMs);
- **periodic inspection of fire-fighting systems** and regular updating of contingency plans in consultation with local authorities. In addition, these facilities are regularly tested through exercises that simulate potential accident conditions as closely as possible.

Should a major event occur despite the implementation of these rigorous preventive measures, arrangements have been made for:

- **establishing a crisis management organisation** that can be triggered rapidly if there is a major event. For example, the relevant high-risk facilities have emergency response plans that aim to bring incidents under control as quickly as possible using local resources so as to guarantee the best possible protection of people and property. These plans are combined with 24/7 on-call crisis management procedures that may be activated depending on the severity of the event. Lastly, some subsidiaries organise

regular training sessions on crisis communications through accident simulation exercises, which allows them to test pre-established communication protocols;

- **the option to obtain assistance from specialist companies.** For example, Rubis Énergie has partnered with Oil Spill Response Ltd to receive assistance in the event of maritime pollution at its fuel depots. It also partners with professional bodies such as GESIP (Groupe d'étude de sécurité des industries pétrolières et chimiques – Group for Safety Research in the Petroleum and Chemical Industries), WLPGA (World Liquefied Petroleum Gas Association), JIG (Joint Inspection Group) and IATA (International Air Transport Association), which are expert organisations in aviation refuelling and provide general operational, training and safety support.

The Rubis Terminal JV Seveso storage sites in question possess both internal and external resources for responding to pollution accidents. For example, specialised companies are appointed to manage any river spills that could be carried along by the current.

RESULTS

In 2022, in line with the target set by the Group, no major accidents occurred in the framework of Rubis Énergie's and the Rubis Terminal JV's activities.

In addition to the constant concern of preventing major industrial accidents, the Group also continues to make efforts to reduce the occurrence of more minor industrial accidents to every possible extent.

For more information, please refer to sections 4.2.3.2.1 “Occupational health and safety” and 4.2.2.1 “Water and soil pollution”.

4.2.3.2 Personal safety / NFIS /



Personal safety is a direct result of operational safety. Rubis is just as attentive to workplace safety (section 4.2.3.2.1) as it is to the safety of customers and local residents (section 4.2.3.2.2). **The Group's objective is to have no fatalities at facilities operated by Group subsidiaries, including the Rubis Terminal JV, and to reduce as far as possible the number of accidents** that are liable to result in lost time for both subsidiary personnel and outside contractors. With regard to road traffic accidents (particularly on the African continent, where the accident rate is high), each subsidiary is responsible for implementing the preventive instructions and training plans needed to reduce the rate of accidents recorded as much as possible, depending on local constraints.

4.2.3.2.1 OCCUPATIONAL HEALTH AND SAFETY / NFIS /



A proactive occupational health and safety policy has been implemented. It covers both preventing occupational accidents and preventing occupational and non-occupational illnesses.

Risks

Beyond the generic risks inherent in any industrial activity, Rubis' activities carry more specific risks in terms of occupational health and safety, which are related in particular to:

- the intrinsic properties of products being handled (hazardous materials);
- transport (road safety): each year vehicles transporting products cover many kilometres.

Each Group entity endeavours to offer the safest working conditions to its employees and to service providers working on its sites.

Measures taken

Rubis' Code of Ethics sets out a general framework for the Group's safety culture, which requires all employees to act responsibly when performing their duties, to comply with the health, safety and environmental protection procedures on site, and to pay particular attention to compliance with these rules by all parties (colleagues, suppliers, external service providers, etc.). On this basis, a quality health, safety and environmental (QHSE) policy has been prepared by Rubis Énergie and the Rubis Terminal JV to protect the physical integrity of individuals and to minimise the impacts of any major accidents.

Since 2015, variable compensation for the Group's Management Board includes a criterion relating to changes in the accident rate (rate of frequency of occupational accidents per million hours worked), underscoring its commitment and involvement in safety challenges.

Occupational accidents and operator safety

To guarantee the maximum level of safety for operators at Group sites, each entity is responsible for holding training sessions for external operators on the risks generated by the facilities and the products handled within such facilities. For example, Rubis Énergie has set itself the additional objective of maintaining a level of training that will enable it to maintain the HSE performance level of its employees.

The Rubis Terminal JV, whose operational teams already receive training on the subject, achieved a **rate of 100% of employees at the head offices in each country who attended an HSE risk awareness training course, which is, moreover, part of the training for all new hires.**

Furthermore, prior to working in a facility, each external service provider must also approve a safety plan (sometimes called a prevention plan or safety protocol) describing the risks associated with the work, safety instructions and emergency instructions.

The objective is for there to be no fatalities and to reduce as far as possible the number of accidents likely to result in lost time, with respect to both subsidiaries' personnel and external service providers.

Occupational illness and health

The Group pays close attention to risks linked to occupational illness and, for several years now, has offered ergonomic training to employees in at-risk positions.

Regarding other health risk factors, exposure measurement campaigns are conducted, notably by the SARA refinery, regarding chemical products, noises and vibrations, Legionella and asbestos.

Regarding non-occupational illnesses, the Group is present in some countries experiencing epidemics. Awareness-

raising and assistance programmes have been developed in some subsidiaries, for example in the context of the fight against AIDS (South Africa), the Ebola epidemic, malaria (Nigeria), the plague (Madagascar), cholera (Haiti) and chikungunya (the Caribbean).

Lastly, private health coverage is taken out for employees to enable them to access healthcare (see section 4.4.3.2).

Road safety

In the area of road safety, the Group is constantly seeking to improve outcomes in terms of road accidents associated with its activities, and in particular those of Rubis Énergie and its subsidiaries. In addition to the application of the regulations applicable to the transport of hazardous materials, additional measures are taken concerning road haulage. To avoid traffic accidents, certain of Rubis Énergie's subsidiaries have stepped up their road risk prevention programmes and give instructions that take local constraints into account, such as no night driving in certain countries and/or random alcohol or drug testing.

Defensive driving programmes have been introduced in countries where driving risk is heightened due to driving habits, distances travelled, poor quality road infrastructure or the specificities of the product being transported. The countries in which the Group operates considered to be the most exposed to road safety risks are among the 100 countries identified by the WHO as having the highest number of accidents: [https://www.who.int/data/gho/data/indicators/indicator-details/GHO/estimated-road-traffic-death-rate-\(per-100-000-population\)](https://www.who.int/data/gho/data/indicators/indicator-details/GHO/estimated-road-traffic-death-rate-(per-100-000-population)). In 2022, 81% of the drivers (91% of employee drivers and 78% of external drivers) had been trained.

Furthermore, measures have been taken to modernise equipment (vehicle fleets), notably in Haiti where, in 2018, a five-year action plan in the amount of approximately US\$17 million was put in place to replace 70 tank trucks belonging to carriers working for Dinasa. Some subsidiaries have rolled out **on-board electronic** assistance (France, Switzerland, and Portugal) and tracking systems (Nigeria, Bermuda, Jamaica, South Africa and Madagascar).

Training as a means of preventing risks

Given the risks associated with its activities, the Group invests in training its employees on health, safety and environmental issues. Detailed data is presented in section 4.4.2.

Results

Workplace accidents

The number of workplace accidents recorded by the subsidiaries' Human Resources Departments (including the Rubis Terminal JV) increased compared to the previous financial year (45 in 2022, compared to 35 in 2021). The efforts made by the operating subsidiaries in the area of health and safety over the past several years, by raising

employees' awareness of the risks associated with their activities (see section 4.4.2) and by improving QHSE procedures (see section 4.2), have gradually and significantly reduced the workplace accident frequency rate. The rate has fallen by more than 42% since 2015 at Rubis Énergie (8.2 in 2015, compared to 4.7 in 2022, per million hours worked) and by 22% at the Rubis Terminal JV (18.3 in 2015, compared to 14.3 in 2022).

While the change in this frequency rate is a key monitoring indicator for the Group, the teams work hard to ensure all accidents are reported, wherever they occur. The Group thus strives to have reporting that is as complete as that required by European regulations. In addition to the analysis of the change in frequency rate, the quality of reporting, which can lead to increases, is thus also a key indicator of safety culture.

	Number of occupational accidents with lost time > 1 day*			Of which number of fatalities			Frequency rate of occupational accidents with lost time (per 1 million hours worked)*			Frequency rate of occupational accidents with lost time (per 200,000 hours worked)*			Number of occupational illnesses			Instances of total and irreversible work disability		
	2022	2021	2020	2022	2021	2020	2022	2021	2020	2022	2021	2020	2022	2021	2020	2022	2021	2020
Rubis SCA/ Rubis Patrimoine	0	0	1	0	0	0	0	0	24.3	0	0	4.9	0	0	0	0	0	0
Rubis Énergie	32	27	31	0	1	0	4.7	4	5.3	0.9	0.8	1.1	1	1	0	0	2	1
TOTAL	32	27	32	0	1	0	4.7	4	4.9	0.9	0.8	1.0	1	1	0	0	2	1
Rubis Terminal JV	13	8	9	0	0	0	14.3	9	11.9	2.9	1.8	2.4	0	1	0	1	0	0
TOTAL INCLUDING THE JV	45	35	41	0	1	0	5.8	4.6	5.5	1.2	0.9	1.1	1	2	0	1	2	1

* Including commuting accidents for French subsidiaries. Commencing in 2022, the indicators occupational "accidents with lost time > 1 day" and "frequency rate of occupational accidents with lost time" no longer include the commuting accidents accounted for by French entities, even if they remain considered as being occupational accidents under the declarations made to health insurance funds in accordance with French regulations. These accidents are accounted for as occupational accidents in only a small number of countries and the HSE measures defined and implemented by Group entities relate above all else to preventing accidents that take place during employees' working hours. It should be noted that travel carried out in connection with an employee's activity during their working hours remains included in the accounting for occupational accidents (employees who travel on business, drivers, etc.). In 2021, four commuting accidents reported by entities within the Rubis Énergie scope resulted in lost time lasting more than one day. If the frequency rate is recalculated by excluding these commuting accidents, the frequency rate stands at 4 for Rubis Énergie and 4 for Rubis Énergie + Rubis SCA/Rubis Patrimoine combined.

In 2022, there were no fatal accidents.

Other occupational accidents leading to lost time of more than one day resulted mainly from slips and low-level falls, handling (LPG cylinders, in particular) or minor injuries (cuts, burns). The severity rate (measured in terms of number of days of absence due to an occupational accident) of occupational accidents rose in 2022 compared to 2021: 0.16 vs 0.06 (0.19 vs 0.08 if the Rubis Terminal JV is included).

The absenteeism rate resulting from occupational accidents and illnesses is still very low across the Group as a whole, standing at 0.13% in 2022 (0.16% including the Rubis Terminal JV).

Accidents involving external providers

Monitoring of accidents occurring at Group sites and involving external providers has also been put in place: 11 accidents were reported by the subsidiaries in 2022 (compared to 20 in 2021). There were no fatalities concerning service providers in 2022.

ABSENCE DUE TO OCCUPATIONAL ACCIDENTS AND OCCUPATIONAL ILLNESS*

	2022	2021	2020
Rubis SCA/Rubis Patrimoine	0%	0%	0.18%
Rubis Énergie (Retail & Marketing/Support & Services)	0.13%	0.07%	0.09%
TOTAL	0.13%	0.06%	0.09%
Rubis Terminal JV	0.46%	0.35%	0.22%
TOTAL INCLUDING THE JV	0.16%	0.10%	0.15%

* Days lost as a percentage of the total number of days worked per annum.

4.2.3.2.2 PROTECTION OF THE HEALTH AND SAFETY OF LOCAL RESIDENTS AND CUSTOMERS / NFIS /



The Group's subsidiaries place particular importance on the health and safety of local residents and customers.

Risks

When local residents live or carry out an activity within the immediate proximity of the Group's sites, they can be exposed to any industrial risks that may occur. While most Seveso industrial sites are not located in urban areas and are only accessible to authorised persons, service stations, which are accessible to the public, are often located in urban or suburban areas. However, the risk regarding service stations is lower because the quantities of products stored there are limited.

Measures taken

All the measures described in the section on operational safety also protect the health and safety of local residents and customers. Depending on the sector in which the subsidiaries operate and their customers' specific expectations, subsidiaries take various initiatives, including:

- **a demanding risk prevention policy** is in place in all subsidiaries, to protect all persons who are liable to be exposed to risks associated with the handling of stored or distributed products. This policy, which gives rise to

substantial internal prevention and control systems, is described in section 4.2.3, section 4.4.2 and in chapter 3, section 3.1;

- **Seveso regulations**, which are extremely stringent with respect to health and safety obligations, are complied with by relevant European sites;
- several subsidiaries have obtained **ISO 9001 and 14001 certifications**, others are in the process of obtaining certification (see section 4.2.1.2). Recognition of this nature attests to commitments made regarding the health and safety of individuals and respect for the environment;
- **a preventive maintenance and facility compliance programme** is implemented in service stations.

The quality of the customer relationship is a key element of the subsidiaries' strategy but also a critical piece of information about consumer health and safety. The resulting initiatives vary depending on the type of customer.

Results

Vitogaz France has had NF Service Relation Client (NF345) certification since 2015. Revised in 2018, NF Service Relation Client certification is based on international standards ISO 18295-1 & 2. A guide to best practices in **customer relationship management**, it takes **customer expectations** into account and aims to guarantee constant improvements to service quality. For Vitogaz France, this **quest for excellence in customer experience** seeks to establish a long-lasting commercial relationship, deliver quality service over time, ensure that information provided is complete and clear, and to promptly meet its commitments.

4.3 Fighting against climate change / NFIS /



The Group recognises the importance and urgency of the fight against climate change; we are aware of the challenges facing our sector in terms of the energy transition. The oil and gas sector plays a key role in access to energy. This is essential to meeting the basic needs of populations (travel, heating, keeping cool, lighting, cooking) and supporting their development. Nevertheless, even today, a large proportion of the population in many of the regions in which we operate (Africa in particular) is deprived of access to energy.

The changing expectations of society and the need to reduce greenhouse gas emissions worldwide are thus leading us to strike the right balance by taking into account:

- the need to contribute to the fight against climate change by reducing the CO₂ emissions related to its activities;
- the expectations of those who want access to affordable and reliable energy so they can meet their essential needs and the social-economic impacts of energy transition. Rubis therefore has a role to play in ensuring that this transition is as just as possible.

In this context, the Group is transforming itself into a multi-energy group, in particular through the acquisition of Photosol in 2022, a photovoltaic electricity producer, in order to support the energy transition by taking into account local realities and needs.

Furthermore, the CSR Roadmap, Think Tomorrow 2022-2025, published by Rubis in September 2021, includes the Group's climate commitments (see section 4.3.4).

This section is structured in accordance with the recommendations of the Task Force on Climate-Related Finance Disclosures (TCFD) (see correspondence table at the end of this chapter, in section 4.3.5).

4.3.1 Governance

Management's role

Rubis has set up a structured governance system involving all levels of management to ensure that these climate challenges are fully incorporated into the Group's strategy.

The Managing Director in charge of New Energies, CSR and Communication at Rubis SCA is responsible for these issues at the Group's Management Committee level, of which she is a member.

She also chairs the Climate Committee, which met three times in 2022. This Committee is made up of the Group CSR Director & Chief Compliance Officer, Rubis Énergie's General Management and its Finance, CSR, HSE and Risk-Resources Directors (Rubis Énergie is the main contributor to the Group's carbon footprint assessment), and a representative of the Rubis Terminal JV. Rubis Énergie's Climate & New Energy team, which was created in 2020, provides input to the Climate Committee and coordinates the operational efforts made by all the Group's subsidiaries. The Committee's key role is to:

- monitor the Climate action plan, which is based around the three pillars, "measure, reduce, contribute to carbon neutrality";
- monitor changes in the carbon footprint and the avenues to reduce it;

- propose solutions for the transition to low-carbon growth in the distribution of energy products.

The principal players in this transition are trained in carbon accounting techniques and climate challenges. In particular, in November 2022, during a CSR seminar bringing together the General Managers of the subsidiaries, all the CSR Advisors, as well as part of the Group's General Management (nearly 80 people), a session was organised on the Climate Fresco, to raise awareness of global warming. Rubis SCA and Vitogaz Switzerland also organised a Climate Fresco session to raise awareness among their teams.

Moreover, as part of the review of Rubis Énergie's decarbonisation objectives, four webinars were organised for subsidiary General Managers, CSR Advisors and employees of subsidiaries involved in the decarbonisation of activities. These webinars made it possible to present Rubis Énergie's scopes 1 and 2 decarbonisation trajectory (2019-2030), the full carbon assessments since 2019 and the scope considered, as well as to illustrate how to calculate tonnes of CO₂ avoided according to the decarbonisation actions implemented (solarisation, installation of LED bulbs, purchase of electric vehicles, etc.).

In addition, some subsidiaries have launched more specific training actions for their employees on climate challenges and their strategy to reduce CO₂ emissions. For example, Vitogaz France has set up regular communication on these topics and organised “Personal Carbon Footprint Assessment” sessions to enable everyone to see their own impact and remain mobilised. Société Réunionnaise de Produits Pétroliers (SRPP) organised awareness-raising workshops for all its employees as part of the CEE SEIZE programme (understanding the climate and energy challenges of the region, knowing the eco-friendly practices adapted to the context of their business, acquiring best practices in terms of electricity demand management (EDM). Galana (Madagascar) organises monthly awareness sessions for its employees, with, for example, quizzes or competitions between employees. SARA produced videos on the roadmap and decarbonisation, distributed to its sites, and organised a carbon footprint assessment training for SARA's main internal players.

In 2023, Rubis Énergie will define a strategy to coordinate and raise awareness of climate challenges among all employees of the Group's subsidiaries.

Monitoring by the Supervisory Board

Rubis SCA's Supervisory Board is responsible for monitoring of the Group's climate strategy and performance. In the

framework of its work on this subject, the Supervisory Board relies on its specialised Committee, the Risk Monitoring Committee. At meetings held in March and September 2022, the Committee examined the Group's current climate challenges, including a review of the presentation of the climate risk factor included in the risk factors published by the Group, the presentation of CO₂ emission reduction targets, and a progress report on the work carried out in respect of the European taxonomy on “adaptation to climate change” and “mitigating climate change” objectives. The Supervisory Board was also informed about Rubis' strategy for developing in the area of renewable energies (acquisition of Photosol) and progress on the assessment of the measures for decarbonising Rubis' activities launched in 2021.

The importance the Group attaches to climate issues is reflected in, among other things, the inclusion since financial year 2019 of an energy efficiency performance criterion that is considered when allocating annual variable compensation to the Management Board. This criterion is based on meeting targets that aim to improve the carbon intensity (operational efficiency) of the Retail & Marketing and Support & Services activities (Rubis Énergie). The satisfaction of this criterion is verified by the Group's Compensation and Appointments Committee each year and is submitted to Annual Shareholders' Meetings for approval.

4.3.2 Strategy

Today, Rubis has undertaken to further incorporate energy transition challenges into its strategy. Although there are many avenues to be explored, significant technological, societal and economic challenges remain to be met in relation to reducing the proportion of fossil fuels in the energy mix and making less carbon-intensive energies available to all. In order for these solutions to be successful and drive progress, they must be adapted to the specific characteristics of each of our regions. Lastly, to be sustainable, growth must also be inclusive. It is therefore essential that the policies implemented to promote the transition to a low-emission economy that is resilient to climate change have a positive social impact.

In this context, in order to move concretely towards growth that is less dependent on fossil fuels, Rubis has identified as the **main pillars of its climate strategy**:

- **decarbonising its historical activities** (emissions related to operations): objective of reducing carbon emissions from operations by 30% by 2030 (2019 baseline, scopes 1 and 2, Rubis Énergie scope representing 99.5% of the Group's consolidated revenue as of 31 December 2022), defined based on an in-depth study of decarbonisation levers. In 2022, an additional objective of a 20% reduction by 2030 (2019 baseline) in scope 3A CO₂ emissions (Rubis Énergie scope, outsourced shipping and road transport, i.e., 45% of scope 3A) was defined;

- **diversification of its Retail & Marketing activities** (carbon intensity of products sold) around three focus areas: mobility, biofuel offering and hybrid solutions offering;
- **renewable energy production**: the Group completed the acquisition of Photosol (photovoltaic electricity producer) in April 2022 and acquired an 18.5% stake in HDF Energy (hydrogen electricity) in 2021.

These strategic pillars are discussed in section 4.3.3.2.

Adapting the Group by reducing the carbon footprint of its activities and diversifying its offering is a key factor in continuing sustainable growth and responding to climate risks (regulatory developments, such as the implementation of carbon taxes, physical risks linked to the effects of climate change, etc.).

Climate challenges present opportunities for Rubis Énergie and the Rubis Terminal JV to develop new offerings and products to aid in energy transition by adapting to the needs and on-the-ground realities of each region in which the Group operates. Indeed, in line with international climate agreements, including the 2015 Paris Agreement, although the fight against climate change is a global challenge and a shared responsibility, transition challenges differ depending on the geographic area.

Rubis is now directly involved in the development of renewable energies, in particular *via* its Rubis Photosol entity, which produces photovoltaic electricity and, in addition, contributes to innovation and the deployment of low-carbon solutions (synthetic diesel, green hydrogen, CO₂ capture by algae, biological carbon sinks), while developing training and employment, and improving the local and global environmental footprint.

To support its investment decision-making, in 2022 Rubis defined a methodology for using an internal carbon price (target for implementation in 2023).

The Group's CSR Roadmap, Think Tomorrow 2022-2025, published in September 2021 includes the Group's climate objectives (see section 4.3.4).

At this stage, Rubis has not made a "Net Zero Carbon" commitment. Indeed, achieving this objective would require Rubis to have massive recourse to measures contributing to global carbon neutrality (offsetting). While Rubis does not rule out the measured use of such *ad hoc* actions in well-defined contexts to contribute to global carbon neutrality, it does not wish to base its climate strategy on this mechanism. Above all, the Group seeks to implement measures to reduce its emissions and diversify its activities, in accordance notably with the ADEME opinion published in July 2021. The few projects implemented to contribute to global carbon neutrality (offsetting) are selected with the greatest care, in particular by taking into account their co-benefits and the involvement and local presence of a subsidiary, so that they fit with the Group's overall CSR approach.

4.3.3 Risk management

4.3.3.1 Description of risks

Climate challenges are included in the Group's risk analysis processes, and its risk mapping work in particular, which contains a dedicated section on the issue. Therefore, each year, every business unit assesses its exposure to climate risks.

The climate risks to which Rubis, and more specifically Rubis Énergie, are exposed are described in greater detail in a dedicated risk factor in chapter 3, section 3.1.2.2. These risks are grouped into two main categories: physical risks (vulnerability of facilities to natural hazards, impact of temperature variations on product sales in the most exposed areas, Europe in particular) and transition risk (changes in the regulatory environment, particularly in Europe with the European Union's Fit for 55 programme; stakeholder expectations). It should be noted that 23% of emissions are linked to business units within EU countries (36% of scopes 1 and 2 and 25% of emissions linked to volumes of products sold), where regulations pertaining to energy transition are the most advanced.

These risks are also described in the Group's response to the CDP Climate Change 2022 questionnaire accessible on the CDP's website.

The Group plans to deepen its analysis of climate, physical and transition risk scenarios in 2023.

These risks do not have the same degree of materiality for Rubis Énergie and for the Rubis Terminal JV due to the different nature of their activities. Present only in Europe, the Rubis Terminal JV's main activity is to provide bulk liquid storage capacity for third parties (fuels including biofuels, chemical products and agrifood products) and, more marginally, to distribute small volumes of fuels.

In order to enhance the consideration of climate risks in its decision-making process, in 2022 Rubis defined a methodology for using an internal carbon price (with an objective for use in all subsidiaries falling within Rubis Énergie's scope by 2023). This tool will help management to better incorporate climate risks and challenges in investment projects (external or organic growth) presented to it.

4.3.3.2 Carbon footprint management measures

The operational measures taken by the Group to control and reduce the carbon footprint related to its activities, and thereby strengthen its climate resilience seek to:

- **improve the energy efficiency of its operations;**
- **diversify the activities of energy distribution;**
- **develop the Renewable Electricity Production activity** thanks to the new Rubis Renouvelables division.

These measures would not be complete without acting on demand, by implementing **support and awareness-raising measures aimed at getting customers** to reduce their emissions by consuming better and less. Finally, actions to contribute to global neutrality (carbon offsetting) are occasionally implemented by the Group's subsidiaries.

IMPROVING THE ENERGY EFFICIENCY OF THE GROUP'S OPERATIONS

The Group makes significant efforts daily to reduce energy consumption in our industrial activities, optimise operating expenses and reduce the impact of its activities on climate change. Particular attention is paid to the most energy-intensive industrial sites. As energy consumption also results in air emissions other than greenhouse gases, some of the measures described below are also aimed at reducing the polluting emissions discussed in section 4.2.2.2.

In 2021, with the help of a specialised consulting firm, Rubis Énergie carried out a comprehensive study aimed at clarifying the decarbonisation trajectories for scopes 1, 2 and 3A (excluding products sold). **The Group has already confirmed an ambitious objective of reducing emissions from operations (scopes 1 and 2): -30% by 2030** (2019 baseline, Rubis Énergie scope, on a like-for-like basis, with changes in scope taking into account the principles of the GHG Protocol). **In 2022, an additional target of a reduction of -20% in Scope 3A emissions (i.e., excluding products sold) has been defined** (2019 baseline, Rubis Énergie scope, covering outsourced shipping and road transport, i.e., 45% of scope 3A).

Rubis' decarbonisation trajectory therefore falls within a well-below 2°C scenario.

Rubis Énergie

Initiatives to reduce energy consumption have been implemented or commenced with respect to the principal sources of carbon emissions (see comprehensive details regarding carbon emissions in section 4.3.4.2), namely:

- the **shipping of distributed products**, i.e., 140 kt representing 30% of Rubis Énergie's CO₂ emissions reflected in the comprehensive carbon footprint assessment (excluding products sold);
- the **energy consumption of Rubis Énergie's industrial facilities**, i.e., 100 kt representing 21% of Rubis Énergie's CO₂ emissions reflected in the comprehensive carbon footprint assessment (excluding products sold). Some 83% of these emissions originate from the SARA refinery (84 kt Group share), an industrial transformation activity that requires energy to be consumed in order for it to be carried out;
- to a lesser extent, the **road transport of its products**, i.e., 70 kt representing 15% of Rubis Énergie's CO₂ emissions reflected in the comprehensive carbon footprint assessment (excluding products sold).

Examples of initiatives

- Initiatives relating to the **Group's vessels**, such as route optimisation, controls and monitoring of bitumen heating to reduce bunker consumption, etc. In order to continue this reduction trajectory, the subsidiaries are making

progress on the use of biofuels in bunkers and the installation of integrated carbon capture and storage systems (CCUS), in a low-carbon navigation market that is still immature, heterogeneous and changing. The Rubis Eastern Caribbean subsidiary, for example, began using 1,167 tonnes of HVO100 (Hydrotreated Vegetable Oil) in its fleet in 2022, i.e., the equivalent of 7% of its marine fuel needs. This also demonstrates the Group's technical ability to use this new type of fuel. The objective for 2023 and subsequent years is to use more biofuels in vessels, depending on their availability on the market. In addition, Rubis Énergie's joining the Sea Cargo Charter initiative in 2021 led to progress in the collection of maritime emissions data. The International Maritime Organization (IMO) has also overseen the decarbonisation trajectory to be followed for vessels, through the CII (Carbon Intensity Index).

- SARA conducted a review of its production processes, which contributed significantly to raising the reduction target from -20% to -30% by 2030 (2019 baseline) on scopes 1 and 2 of the Rubis Énergie scope.
- **Energy saving initiatives in service stations**, such as replacing lane lighting with LEDs or, solarising stations in Kenya and the Caribbean by installing photovoltaic panels to reduce electricity purchases but also improve the reliability of access to electricity. The Dinasa subsidiary in Haiti has deployed more than a hundred autonomous streetlights (powered by solar energy) at its depots.
- **Solar powering of warehouses and headquarters**. As of 31 December 2022, seven subsidiaries had installed photovoltaic panels on their buildings, i.e., the equivalent of 773 kWp installed. The rate of assets undergoing solarisation is increasing significantly and will intensify in the coming years, with an estimate of an internal portfolio for projects of this type at 3.1 MWp under study.
- Actions relating to **road transport**: less carbon-intensive land transport solutions are gradually being tested in the various regions in which the Group operates. An initial test of an LNG powered truck was conducted in Portugal. Road transport by certain subsidiaries is carried out using HVO (Channel Islands, Réunion Island). As part of a trial, Vitogaz Switzerland placed an order for two electric trucks in 2022, delivery of which is scheduled for 2023. Furthermore, operations to optimise delivery rounds, the renewal of fleets towards vehicles with lower consumption and the training of drivers in eco-driving are rolled out with the assistance of the transport companies providing these services for the Group's subsidiaries. Moreover, through a partnership between Rubis Énergie and the start-up Wenow, Vitogaz France and Vitogaz Madagascar have connected their light vehicles, allowing users to adapt their driving to reduce their fuel consumption and therefore their emissions.

Rubis Terminal JV

The **energy consumption of the Rubis Terminal JV industrial facilities** represented 11.5 kt (scopes 1 and 2 of the complete carbon footprint assessment of the Rubis Terminal JV) in 2022. It results from the use of boilers to maintain the temperature of certain products requiring heated storage.

Examples of initiatives

As part of modernisation programmes, the boilers at the Rubis Terminal JV sites are being replaced by heat pumps or mixed systems (heat pumps and boiler) or, local conditions permitting, by greener heating systems (geothermal for instance).

DIVERSIFICATION OF OUR HISTORICAL ACTIVITIES

Rubis Énergie

In line with its DNA, the Group favours a decentralised approach to identifying solutions adapted to the specific characteristics of each local environment (climatology, vehicle fleet, etc.). These projects are being developed around the three following themes:

- offering hybrid solutions: solarisation of facilities (with or without storage), in addition to the use of other energy sources;
- offering biofuels;
- mobility (electric vehicle charging stations, for instance).

Some subsidiaries have already launched projects to diversify their activities and market fuels with a less carbon-intensive life cycle.

Exploration of locally produced low-carbon solutions

Rubis Énergie develops solutions adapted to the regions where it operates with a view to making local production of low-carbon energy from inputs, residues or waste collected locally both feasible and accessible. The sustainability thus targeted is of great value in terms of the energy independence of these regions, the increase in skills in the immediate vicinity of the places of consumption, as well as a sometimes significant impact on the country's trade balance.

For example, the Rubis Energy Jamaica subsidiary welcomed a renewable energy expert from HDF Energy in 2022. This expert aims to help supervise the prospecting, identification and design of large-scale energy projects combining renewable energy and hydrogen storage.

Renewable energy production at the Martinique refinery

SARA has chosen to capitalise on the advantages of its geography and industrial process to diversify its activities in the area of renewable energy.

A true laboratory in the field of energy transition, SARA has for several years been developing projects to convert the hydrogen produced by its activities into green electricity (ClearGen) and to build a photovoltaic power plant to supply decarbonised electricity to around 3,000 residents in Martinique. SARA is actively playing its role in the fight against climate change through new projects. Biogas production projects in French Guiana are continuing: Hydrane, a project to cultivate aquatic biomass on large abandoned cultivable areas, and Hyguane, whose purpose is the pilot production of green hydrogen for space and mobility. SARA is just as active in the other regions of its scope with the launch of two pilot projects for the production of green hydrogen in Martinique and Guadeloupe. SARA also wants to be part of the sustainable mobility initiative in the French Antilles, in particular with the introduction of the first hydrogen car in Martinique and Guadeloupe to raise awareness among our stakeholders about other energy vectors.

Rubis Terminal JV

The Rubis Terminal JV is gradually diversifying its activities by developing the mix of products stored in its terminals.

In 2022, fossil fuels represented 40% of revenues from stored products (compared to 48% in 2021). Other liquid products, such as biofuels, chemical products, fertilisers, edible oils and molasses, are also stored and represent 60% of the joint venture's revenue (compared to 52% in 2021 and 40% in 2020).

LNG storage project

Engely and the Rubis Terminal JV have signed a cooperation agreement to launch studies on the installation of an LNG storage facility at the Reichstett terminal (Bas-Rhin). The objective is to meet the retail LNG needs of central-western Europe for road and river transport, and for industry.

DEVELOPMENT OF NEW ACTIVITIES IN RENEWABLE ENERGIES

In April 2022, Rubis announced the acquisition of Photosol, allowing it to accelerate its transition to renewable energies and decarbonisation. With a capacity of more than 500 MWp in service and ready to build at the end of 2022, as well as 3.5 GWp of projects under development, Photosol is one of the leading independent developers of photovoltaic electricity in France, with the target of reaching more than 1 GWp of installed capacity by 2026 and 2.5 GWp by 2030.

These activities are grouped within a new division, Rubis Renouvelables. This division is dedicated to the development of renewable or low-carbon energies, in addition to Rubis Énergie's historical Support & Services and Retail & Marketing activities, as well as the Storage operated by the Rubis Terminal JV. This new division is expected to represent 25% of the Group's EBITDA in the medium term.

In addition, the collaboration with HDF Energy (in which Rubis SCA holds an 18.5% stake) is continuing on various projects after the start-up of operations of ClearGen (1 MWp fuel cell at the SARA refinery) and the stake in the West Guyana Power Plant (CEOG). Thus, Rubis Énergie acquired a 51% stake in the joint venture developing the Renewable® concept in Barbados (RSB project) aimed at ensuring the stable production of 12MW of solar energy during the day and in the evening and 3MW of power at night. The Group is leading the project contributing the most to date in baseline production, at 7%, to the Barbados government's 2030 target of achieving 100% renewable electricity on the island.

MEASURES AIMED AT CONSUMERS

Aware that customer use of the fuels it distributes generates CO₂ emissions, Rubis Énergie implements initiatives aimed at encouraging consumers to make better use of these products in their day-to-day lives. In 2022, 48% of our business units organised an energy efficiency awareness campaign for our customers.

For several years now, initiatives aimed at customers, professional and individuals have been carried out:

- **supporting consumers in energy saving programmes**, in particular through information and awareness-raising initiatives about energy consumption habits;
- **raising customer awareness of Rubis' renewable products**: in the Channel Islands, numerous advertisements are published in several local publications to increase awareness among the island's residents of products such as renewable diesel, renewable fuel oil and solar energy. Rubis Énergie's subsidiary thus promotes the environmental performance of HVO among both professional and individual retail customers;
- **promoting the use of liquefied gas as a transitional energy**: liquefied gas is an integral part of the energy transition, particularly in emerging countries where a significant portion of the population is energy insecure. The characteristics of LNG make it possible to respond to concerns about energy access while preserving against massive deforestation by replacing wood charcoal. Some 20 Rubis Énergie subsidiaries are positioned on the liquefied gas distribution market (bottled and bulk) and encourage its use as a substitute for the most CO₂-emitting energies, such as fuel oil for heating and wood or charcoal for cooking. In 2022, liquefied gas accounted for nearly 23% of the volumes of products sold by Rubis Énergie.

For example, in Madagascar, more than 97% of households still rely on firewood and charcoal for cooking energy. To stop the massive deforestation this entails, the Malagasy government has identified various measures, including the use of alternative energies.

Vitogaz Madagascar takes part in this energy policy by promoting the use of bottled liquefied gas and by facilitating household access to this product. The extension of retail gas outlets has thus removed one of the barriers to the purchase of liquefied gas cylinders. Carrying on from prior initiatives, Vitogaz Madagascar distributed over 5,000 Fatapera kits (a portable stove for cooking that attaches directly to the gas cylinder). In addition, awareness-raising operations on access to gas were carried out with the Ministry of the Environment and Sustainable Development, the Ministry of Economics and Finance, as well as with various companies.

In terms of consumer awareness, Vitogaz Madagascar continued to produce culinary television programmes with chefs cooking using gas, also highlighting the culinary heritage of the various regions of the country.

In addition, Vitogaz France, Vitogaz España, Rubis Energia Portugal and Vitogaz Switzerland continue to promote the use of liquefied gas as fuel. A vehicle running on LPG emits up to 20% less CO₂ than a petrol vehicle and practically no pollutants (particles, sulphur dioxide SO₂ or nitrogen oxides NO_x) (see boxed text on pollutant emissions in section 4.2.2.2).

Quantitative data on CO₂ emissions linked to customers' use of products sold by the Group are included in the "Greenhouse gas emissions" table set out in section 4.3.4.2.

CONTRIBUTION TO GLOBAL NEUTRALITY

In 2022, several projects aimed at contributing to global neutrality were launched or studied, in regions where the local involvement of subsidiaries is high. Prioritising decarbonisation over carbon offsetting, Rubis Énergie is increasing its expertise in the development of carbon projects with high regional added value. The objective is to increase the impact of its actions through the lever of carbon finance. This is based on revenues from the resale of high value-added credits (blue carbon, high local content, multiple co-benefits) generated by certified carbon sequestration actions. The subject is to ensure sustainability in all these aspects while having a positive impact on the climate.

For example, in Madagascar, the Vitogaz Madagascar and Galana subsidiaries are coordinating, on behalf of Rubis Énergie, the sole financier of the plot, a mangrove replanting project in the province of Mahajanga. The plantings are carried out by a local intermediary, a social enterprise with strong regional roots and involving local populations throughout the project. In 2022, 35 hectares of mangrove trees were planted in this way, out of a total 313 hectares planned. In addition to regional challenges, one hectare of mangrove will capture around 10 times more CO₂ than one hectare of terrestrial forest, due to its specific characteristics. Furthermore, endemic biodiversity will be redeveloped there.

In Corsica, Vito Corse studied the feasibility of its participation in a Posidonia seagrass transplant project, led by GIS Posidonies and the University of Corsica. Posidonia meadows are veritable carbon sinks, fixing around 5.2 t CO₂ eq. per hectare per year, in addition to the existing stock of around 2,600 t CO₂ eq. Funding for this project will begin in 2023.

Lastly, Eres Togo financed the local planting of 32 hectares of mangroves in 2022, i.e., 24 hectares more than requested by the government as part of the environmental certificate.

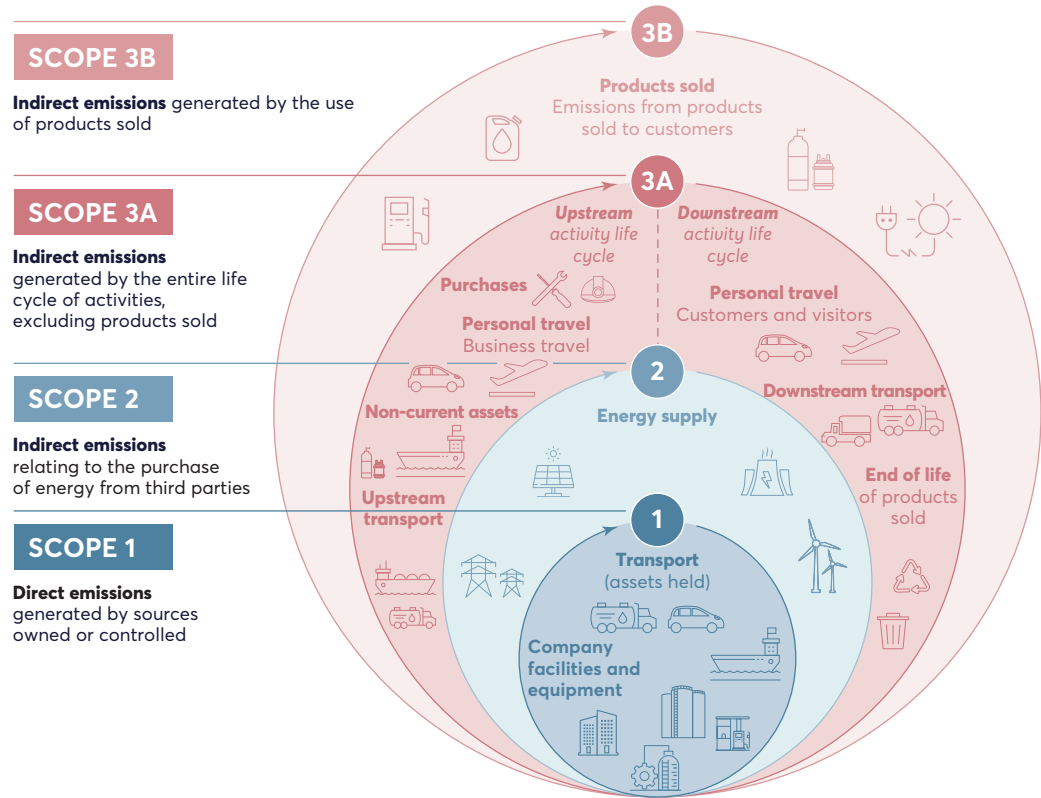
4.3.4 Objectives and indicators

To address these risks and define its transition trajectory, Rubis follows the “measure, reduce, contribute to planetary neutrality” approach. To better assess our carbon footprint, we have been undertaking a comprehensive greenhouse gas emissions assessment of our activities since 2019. The scope covered includes the activities of the Rubis Terminal JV, as well as products sold, so as to identify the most effective means available to us of reducing our footprint. Initially, the assessment was carried out in accordance with the methodology designed by the Ademe (*Agence de l'environnement et de la maîtrise de l'énergie*), based on the recommendations of ISO 14064-1 (see the methodology note contained in section 4.6.1.1 for more details on the reporting scope), and was carried out in the first year with the support of an Ademe-certified firm that trained Rubis' teams in carbon accounting. **In 2021, the Group reassessed its greenhouse gas emissions in strict compliance with the GHG Protocol.** The refinement of this methodology and the consolidation of new subsidiaries led the Group to **revise**

the results for 2019, which are used as the baseline for setting the Group's CO₂ emission reduction targets. The changes made are described in the notes to the emissions table.

Greenhouse gas emissions are accounted for across three scopes:

- scope 1: direct emissions from fixed or mobile facilities located within the undertaking's organisational scope;
- scope 2: indirect emissions related to the production of electricity and heat and cold used;
- scope 3: other indirect emissions generated by third-party activities upstream or downstream of the undertaking's activities. These emissions are presented in two distinct categories, scope 3A (outsourced upstream and downstream transport of products, travel, purchases of goods and services, upstream electricity, non-current assets, waste) and scope 3B (emissions generated by the use of products sold).



It should be noted that the impact of the Group on greenhouse gases is limited to carbon impact, since greenhouse gas emissions other than CO₂ are insignificant, or even non-existent. Contrary to other players in the oil and gas sector, Rubis does not have any extraction activities, which emit methane.

Regarding Rubis Photosol's Photovoltaic Electricity Production activity, acquired in April 2022, the completion of its carbon footprint assessment is scheduled for 2023, in line with the GHG Protocol.

4.3.4.1 Climate objectives

The Group gradually and methodically defines its CO₂ emission reduction goals. Ultimately, the objective is to reduce the carbon footprint of all scopes.

Rubis Énergie has developed an action plan to reduce its CO₂ emissions. The plan was designed after extensive consultation with subsidiaries and functional departments, with the support of consultants specialised in each of the Company's key business lines (land transport, shipping, refining, storage site management). Emission reduction objectives have been progressively and methodically

defined on the basis of this consolidated action plan, which is defined for the 2019-2030 period. They were communicated in the CSR Roadmap, Think Tomorrow 2022-2025, published in September 2021 and for which a progress report is published each year.

In order to share its efforts and for the sake of transparency, the Group has completed the CDP's Climate Change questionnaire since 2021 and maintained its B rating for its second reporting year.

RUBIS ÉNERGIE

Reduce the CO₂ emissions from our operations

30% reduction in scopes 1 and 2 emissions by 2030 (Rubis Énergie scope, 2019 baseline, constant scope, in compliance with the GHG Protocol)

The levers identified to achieve this target are based on initiatives by Rubis Énergie and its subsidiaries, but also on technological and regulatory advances.

This target was supplemented in 2022 by a target for scope 3A (excluding products sold): a 20% reduction by 2030 in scope 3A emissions (Rubis Énergie scope, 2019 baseline, covering outsourced shipping and road transport, i.e., 45% of scope 3A).

The levers identified to meet this objective notably relate to fleets of vehicles and vessels used to transport imported and/or sold products (use of biofuels, fleet renewal, journey optimisation, slow-steaming) and, to a lesser extent, best practices in environmentally friendly driving.

Reducing the carbon intensity of our products

The Group planned to define a target for reducing the carbon intensity of products sold in 2022. Nevertheless, as the acquisition of Photosol led to a change in the product mix sold, through the integration of new activities, the definition of this objective was postponed.

Raising customer awareness

In 2022, 48% of our business units organised an energy efficiency awareness campaign for our customers.

RUBIS TERMINAL JV

The Rubis Terminal JV formalised and published a roadmap containing its targets for 2025 and 2030, expressed in carbon intensity (ratio of kg CO₂ to throughput out (i.e., per tonne of product leaving the joint venture's terminals)) by type of depot (for the figures reported in respect of 2022, see section 4.3.4.2).

4.3.4.2 Greenhouse gas emissions

(in kt eqCO ₂)	2022	2021	2020	2019
Scope 1⁽¹⁾ Direct greenhouse gas emissions				
Retail & Marketing	35	36	31	30
Support & Services (refining/shipping)	200	160 ⁽³⁾	178 ⁽³⁾	214 ⁽³⁾⁽⁶⁾⁽⁷⁾
TOTAL SCOPE 1 RETAIL & MARKETING/SUPPORT & SERVICES	235	196	209	245
Rubis Terminal JV – Group share ⁽²⁾	79	10.8	10	NA
Scope 2⁽¹⁾ Indirect emissions linked to energy consumption at sites				
Retail & Marketing	4.8	5.4 ⁽⁴⁾	5.1 ⁽⁴⁾	6.1 ⁽⁴⁾
Support & Services	5.0	5.6	1.8	1.4
TOTAL SCOPE 2 RETAIL & MARKETING/SUPPORT & SERVICES	9.8	10.9	6.9	7.6
Rubis Terminal JV – Group share ⁽²⁾	3.6	4.7	3	NA
TOTAL SCOPE 1 AND 2 RETAIL & MARKETING/SUPPORT & SERVICES	244.8	206.8	216	252.3
TOTAL SCOPE 1 AND 2 GROUP SHARE	256.3	222.3	229	NA
Scope 3⁽¹⁾ Other indirect emissions				
Retail & Marketing/Support & Services	13,259	13,050 ⁽⁴⁾⁽⁵⁾⁽⁶⁾	12,427 ⁽⁴⁾⁽⁵⁾⁽⁶⁾	13,762 ⁽⁴⁾⁽⁵⁾⁽⁶⁾
• of which use of products sold for final use by customers (category 11)	13,034	12,867	12,259	13,570 ⁽⁸⁾
Rubis Terminal JV – Group share ⁽²⁾	5198	561	355	NA
TOTAL SCOPE 3 GROUP SHARE	13,779	13,611	12,782	NA

(1) See breakdown of items calculated for each of scopes 1, 2 and 3 in the description of methodology contained in section 4.6.3.

(2) Share based on the Group's shareholding, i.e., 55%.

(3) Restatement due to an increase in scope through the integration of the Asphalt Teranga vessel into the Rubis Énergie fleet.

(4) Restatement due to material errors.

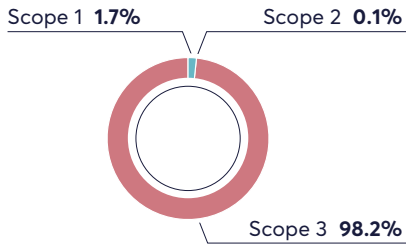
(5) Restatement due to changes in accounting method for emissions related to Spot Charters following the harmonisation of methodologies with those of Sea Cargo Charters.

(6) Restatement due to the increase in the organisational scope of the carbon footprint assessment (acquisition of subsidiaries).

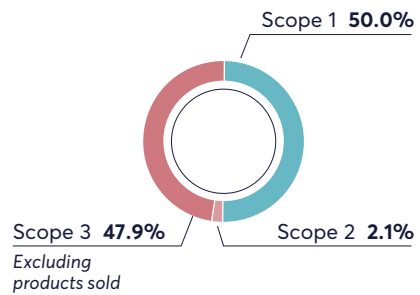
(7) Restatement due to material data accounting errors (SARA, marine fuel consumption in the Bahamas, Galana shareholding rate correction, etc.).

(8) Restatement following the adjustment to the shareholding rate applied to Galana.

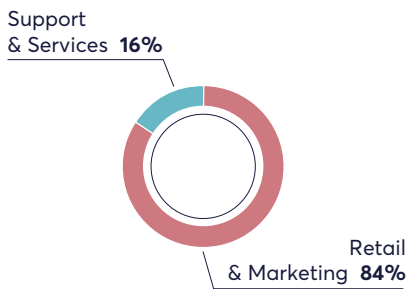
Overall breakdown of scopes 1, 2 and 3
(excluding the Rubis Terminal JV)



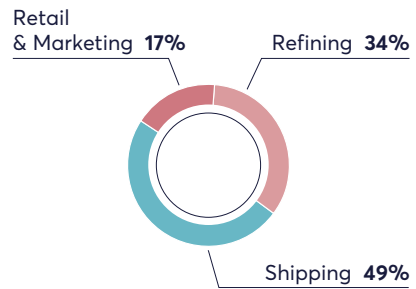
Breakdown of scopes 1, 2 and 3 excluding emissions related to the use of products sold
(excluding the Rubis Terminal JV)



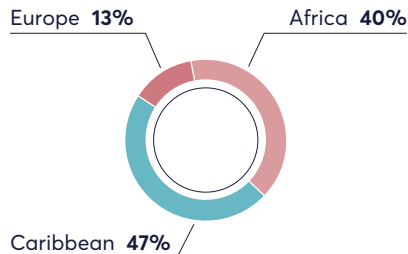
Overall breakdown of emissions by activity
(excluding the Rubis Terminal JV)



Breakdown of scopes 1 and 2 emissions by activity
(excluding the Rubis Terminal JV)



Overall breakdown of scopes 1, 2 and 3 by region*
(excluding the Rubis Terminal JV)



* Emissions are included in the geographical regions to which they are assigned (Europe, for mainland France, the Caribbean for Guadeloupe, Martinique and French Guiana, and Africa for Réunion Island).

Generally speaking, the energy consumed by the Group's industrial facilities (electricity, steam, fuels) contributes to the proper day-to-day functioning of the industrial facilities, including safety equipment (fire motor pumps, emergency generators, etc.).

With regard to emissions linked to the use of products sold, Rubis Énergie (and the Rubis Terminal JV to a very marginal extent) distributes petroleum products that emit CO₂ when used by customers. This item constitutes the principal source of the Group's CO₂ emissions and almost all scope 3 emissions, although in 2021, 52% of gross profits resulted from sales of liquefied gas and bitumen, which are products that emit little to no CO₂ in use and correspond to 14% of the Group's total emissions.

In 2022, an 18% increase in scopes 1 and 2 emissions (i.e., +38 kt) was observed. It is due in particular to the complete restart of the refinery (+30 kt). The remainder is the result of an increase in activity and the occasional use at

Ringardas (Nigeria) of petroleum fuels instead of natural gas over a period during the year, resulting in increased emissions at certain times. The increase in operating emissions was limited in relation to the increase in the volumes of fuel distributed, reflecting an improvement in the energy efficiency of our operations. This notably reflects the efforts made to modernise the truck and vessel fleets, as well as a further improvement in the energy efficiency of the bitumen facilities. Moreover, for scope 3 excluding products sold (scope 3A), the significant increase in emissions is almost exclusively due to the taking into account of one-off emissions related to the construction of the Bitu River and Demerara vessels (+34 kt compared to 2021) and the mechanical increase in emissions related to the upstream energy consumed directly (in particular SARA). The decrease in scope 1 emissions of the Rubis Terminal JV at constant scope was 14% and 13% for scope 2.

4.3.4.3 Carbon intensity indicators

RUBIS ÉNERGIE

Operations carbon intensity indicator	2022	2021	2020
Tonnes CO ₂ eq (scopes 1 & 2)/EBITDA x 1,000	0.360	0.375	0.409

In 2021, Rubis Énergie defined a more relevant indicator than that previously used to assess the carbon intensity of its operations. The previous indicator compared scopes 1 and 2 CO₂ emissions to volumes of emissions sold in MWh. However, for certain activities, no emissions are linked to the use of products sold. In particular, bitumen sales cannot be converted into MWh because bitumen is not used by our customers for energy (used for road infrastructure projects in particular). Therefore, the indicator did not correctly reflect the variety of Rubis Énergie's activities and the result of the actions it has taken to reduce the carbon emissions of its operations.

RUBIS TERMINAL JV

A change in method was introduced between 2019 and 2020. The Rubis Terminal JV now considers outgoing product volumes (throughput out) as a reference instead of incoming and outgoing product volumes (throughput in + out) in order to align itself with other financial indicators that also use "throughput out" as a reference.

The Rubis Terminal JV also distinguishes depots according to three categories of activities: fuel distribution depots (36% of the Rubis Terminal JV's storage capacity); mixed depots (46%) and chemical product depots (18%).

Indicators	2022	2021	2020
Kg CO ₂ /tonne of throughput out (total all depots)	1.25	1.62	2.04

The reduction in this indicator corresponds, at constant scope, to an improvement across all sites thanks to operations to change the fuel to gas and the optimisation of facilities. At constant scope, the overall reduction in intensity is 15.2%, with the Y-1 reference value excluding Turkey being 1.47.

ENERGY PRODUCTION AND CONSUMPTION AT INDUSTRIAL SITES

(in G.J)	Energy production			Energy consumption		
	2022	2021	2020	2022	2021	2020
Refining (Support & Services)	577,496	349,630	406,231	1,555,277	1,105,741	1,193,241
Retail & Marketing	NA	NA	NA	551,171	348,950	442,956
Rubis Terminal JV	NA	NA	NA	318,798	423,631	363,155
• of which Group share	NA	NA	NA	175,338	232,997	199,735

The refinery is equipped with a cogeneration combustion turbine for producing electricity (3.5 MW) and superheated steam (9 t/h); two boilers also produce superheated steam, a main boiler (22 t/h) and a secondary boiler (15 t/h). In 2022, the aggregate volume of energy produced (electricity and steam) represented 37% of the energy consumed over the period, which was stable compared to 2021.

The Retail & Marketing activity does not produce energy, or only very marginally. A solarisation programme applicable to our sites and service stations is in progress (total installed capacity of 328 kWp as of 31 December 2022).

In 2022, the energy sources for Rubis Énergie's buildings were natural gas, LPG, heating oil, diesel, biofuel, electricity supplied by the grid and on-site photovoltaic facilities and a heating network.

In 2022, the net energy consumption of the Rubis Terminal JV sites decreased compared to that of 2021, representing a decrease of 11% at constant scope. Despite the moderate increase of 2% in throughput in 2022, there was a general decrease in electricity consumption, due in particular to a change of contract in Rotterdam and the suspension of the bunkering activity, leading to the shutdown of a blending compressor and a vapour treatment unit that generated very high consumption.

The sharp increase in the prices of all energies has accelerated investments aimed at reducing our consumption.

4.3.5 TCFD correspondence table

In 2017, the Task Force on Climate-Related Financial Disclosures (TCFD) of the G20's Financial Stability Board published its recommendations on climate-related information to be published by companies.

Theme	TCFD's recommendations	Source of information in Rubis reporting
Governance Disclose the organisation's governance around climate-related risks and opportunities.	<ul style="list-style-type: none"> Describe the Board's oversight of climate-related risks and opportunities. Describe Management's role in assessing and managing climate-related risks and opportunities. 	URD 2022 – section 4.3.1 CDP C1.1 URD 2022 – section 4.3.1 CDP C1.2
Strategy Disclose the actual and potential impacts of climate-related risks and opportunities on the organisation's businesses, strategy, and financial planning where such information is material.	<ul style="list-style-type: none"> Describe the climate-related risks and opportunities the organisation has identified over the short, medium, and long term. Describe the impact of climate-related risks and opportunities on the organisation's businesses, strategy, and financial planning. Describe the resilience of the organisation's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario. 	URD 2022 – section 4.3.2 CDP C2.2 URD 2022 – section 4.3.2 CDP C3.3
Risk management Disclose how the organisation identifies, assesses, and manages climate-related risks.	<ul style="list-style-type: none"> Describe the organisation's processes for identifying and assessing climate-related risks. Describe the organisation's processes for managing climate-related risks. Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organisation's overall risk management. 	URD 2022 – section 4.3.3 CDP C2.1 URD 2022 – section 4.3.3 CDP URD 2022 – section 4.3.3 CDP C2.2
Metrics and targets Disclose the metrics and targets used to assess and manage relevant climate-related risks and opportunities where such information is material.	<ul style="list-style-type: none"> Disclose the metrics used by the organisation to assess climate-related risks and opportunities in line with its strategy and risk management process. Disclose scope 1, scope 2, and, if appropriate, scope 3 greenhouse gas (GHG) emissions, and the related risks. Describe the targets used by the organisation to manage climate-related risks and opportunities and performance against targets. 	URD 2022 – section 4.3.4 CDP C6 URD 2022 – section 4.3.4 CDP C6 URD 2022 – section 4.3.4 CDP C4.1

4.4 Attracting, developing and retaining talents

Mindful that employee commitment is key to the Group's success, Rubis ensures that individuals have the opportunity for professional development, with the aim of attracting, developing and retaining its talents. To do so, Rubis focuses its efforts on promoting diversity and equal opportunities (section 4.4.1), employee skills development (section 4.4.2), health, safety and well-being at work (section 4.4.3) and involving employees in the Group's value creation (section 4.4.4).

Group risk mapping has identified the main human resources risks related to the Group's activities. These risks mainly concern the health and safety of employees and external service providers working at Group sites. Apart from these risks, a key challenge relating to human resource management was identified by the relevant Management in each division: attracting, developing and retaining talent while the Group grows and where human resources must be adapted to Rubis' development strategy. This challenge is dealt with in this chapter.

In line with its corporate culture and in order to make the most of its human capital and better address the specificities involved in the Group's activities, the deployment of Rubis' human resources policy has been decentralised. Rubis Énergie and its subsidiaries, Rubis Renouvelables and its subsidiary Rubis Photosol, as well as the Rubis Terminal JV, manage their human resources autonomously in line with Rubis' values and implement local actions adapted to their needs and challenges.

In addition, in order to support skills development and foster internal mobility, a project relating to establishing a process for identifying and supporting Talents was launched in Rubis Énergie at the end of 2021. Interviews with the Group's key players were carried out and a Steering Committee was created bringing together Group employees from various functions, activities and business lines. These steps made it possible to define a notion of "Potential" and "Talent" that can be applied in all the Group's territories and activities,

as well as to validate common detection and identification criteria. Following a validation phase of these processes at the end of 2022 via the "pilot" subsidiaries, the rollout of this system across all Rubis Énergie entities began in the first quarter of 2023 and will then be renewed annually.

Employee status and fluctuations in numbers

As of 31 December 2022, the Group had 4,498 employees, including 573 at the Rubis Terminal JV. Within Rubis Énergie, headcount increased in the Europe zone in particular (+4%). The 112 employees of Rubis Photosol, acquired in April 2022, are included in the Group's headcount and in all social data for 2022 (excluding training data).

The Group's shipping activity requires the use of crews who are hired through interim agencies or under a limited term employment agreement. As of 31 December 2022, the headcount of crew members who had signed an employment contract with a Group entity (under international temporary contracts) or with an interim agency, stood at 225. These non-permanent employees are not taken into account in the published social metrics. However, Rubis is particularly careful to ensure that the working conditions of these crews comply with the ILO (International Labour Organization) conventions applicable to them (see section 4.5.1.1). In 2022, no non-compliance was reported during the external audits carried out on compliance with the Maritime Labour Convention.

CHANGE IN PERMANENT EMPLOYEES BY DIVISION AND BY REGION

Number of employees	31/12/2022	31/12/2021	31/12/2020	2021/2022 change
Rubis Énergie (Retail & Marketing/Support & Services)⁽¹⁾	3,788	3,685	3,669	+2.8%
Europe	707	680	672	+4%
Caribbean ⁽²⁾	1,263	1,242	1,322	+1.7%
Africa	1,818	1,763	1,675	+3.1%
Total France (including French overseas departments, territories and collectivities)	737	730	729	+1%
Rubis SCA/Rubis Patrimoine (France)	25	24	24	+4.2%
Rubis Photosol (France)	112	NA	NA	NA
TOTAL	3,925	3,709	3,693	+5.8%
Rubis Terminal JV⁽³⁾	573	626	449	-8.5%
• of which France	305	296	282	+3%
TOTAL INCLUDING THE JV	4,498	4,335	4,142	+3.8%

(1) Employees in France are included in the headcount of the regions to which they are assigned (Europe, for mainland France, the Caribbean for Guadeloupe, Martinique and French Guiana, and Africa for Réunion Island).

(2) Previously, non-permanent employees (vessel crews) were accounted for in the Caribbean headcount. In the context of the restructuring of its CSR approach, Rubis decided to put in place differentiated monitoring indicators in order to take the specificities of managing these teams in to account.

(3) Significant increase between 2020 and 2021 due to the integration of the Tepsa subsidiary (167 employees). Decrease between 2021 and 2022 due to the exit of Rubis Terminal Petrol.

4.4.1 Promoting diversity and equal opportunities / NFIS /



Diversity and inclusion are part of the Group's DNA. They are an asset to the Company and key to the effectiveness of its teams. The Group is committed to ensuring that there is no discrimination based on origin, religion, gender or sexual orientation, health status and/or disability, political views, religious beliefs or family status. These values are clearly stated in the Group's Code of Ethics. To ensure that each individual is protected against discrimination, a whistleblowing system (Rubis Integrity Line) has been rolled

out across the entire Group so that any situation undermining the Group's values and those of its subsidiaries can be reported. The Integrity Line allows all Group employees as well as external and temporary workers to securely report any alerts via a website (see section 4.5.1.1).

Since combatting discrimination is a major issue in the area of employment, the Group has set itself the target of there being zero proven reports of discrimination, notably through the application of its ethics hotline.

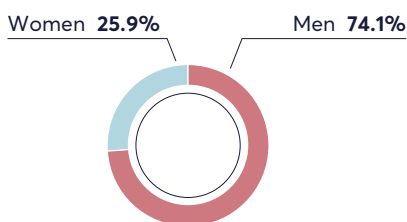
4.4.1.1 Gender equality

RISKS

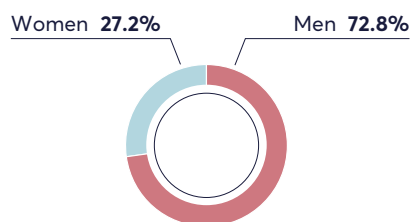
The Group mainly carries out its activities in an industrial environment in which men have historically been the majority. In line with its principles of non-discrimination and convinced that the lack of diversity is detrimental to the creation of value, the Group has taken initiatives to help talent to flourish without any gender distinction.

GENDER BREAKDOWN WITHIN THE GROUP AS OF 31/12/2022

Rubis Group (including the Rubis Terminal JV)



Rubis Group (excluding the Rubis Terminal JV)



MEASURES TAKEN TO IMPROVE GENDER EQUALITY IN THE WORKPLACE

Measures to improve professional equality between men and women are progressively being implemented within Group entities. For example, Rubis Énergie's Jamaican subsidiary (Rubis Energy Jamaica) is one of the first companies in the English-speaking Caribbean to have committed, in March 2019, to the gender equality certification process devised by the United Nations Development Programme (Gender Equality Seal). This certification includes the following objectives:

- eliminating gender-based pay gaps;
- increasing the role of women in decision-making;
- improving work/life balance;
- improving women's access to traditionally male jobs;
- eradicating sexual harassment in the workplace;
- communicating in a more inclusive, non-sexist, way.

Company agreements promoting the inclusion of women and gender equality in the workplace have also been entered into in some of the Group's subsidiaries and complement existing measures in the area of fighting against discrimination in hiring, the promotion of equal pay, career development, etc.

For instance, Vitogaz France entered into a company agreement aimed at facilitating women's access to positions of responsibility, neutralising the impact maternity/adoption leave periods have on professional evaluation and career development and, lastly, balancing work and family obligations.

In 2021, SRPP (Réunion Island) renewed its company agreement with four objectives (which are monitored by defined quantitative indicators) aimed at promoting professional equality between men and women:

- achieving an equal percentage of review of individual situations by gender over the term of the agreement;
- ensuring equal access to training for both men and women;
- when recruiting for permanent, fixed-term or temporary contracts, presenting at least one female candidate in predominantly male sectors (at gas filling plants for example); likewise, presenting at least one male candidate in predominantly female sectors (administrative and accounting services for instance);
- 100% of employees will have an interview with their Manager upon return from maternity or parental leave and 100% of requests for paternity leave will be granted on first request and on the dates selected by the employee.

Communication campaigns were also launched to highlight women's involvement in the Company and to help combat gender stereotyping in the workplace. For example, the Rubis

subsidiary operating in the eastern Caribbean (Rubis Caribbean) is actively involved in the international Women's History Month campaign, which consists of putting the spotlight on women's contributions to historical events and contemporary society by publicly recognising the work done by its female employees.

In 2019, SARA launched the "NO to Sexism" campaign at all its sites. Since then, a series of actions regularly remind Group employees and employees of outside companies that sexism in any form whatsoever will not be tolerated. Through real-life scenes, a team of actors first helped each participant to understand what sexist behaviour is and how serious it is. Articles are regularly published on the subject. To go further, a leaflet has been distributed to remind everyone of the law on the subject and the penalties incurred.

On 8 March 2022, many subsidiaries mobilised to celebrate International Women's Day with the theme "Equality today for a sustainable future". For example, Galana (Madagascar) organised a reception followed by a film and relaxation session for all its female employees. At Rubis Énergie Djibouti, a fun time was organised and General Management personally thanked its female employees for the quality of their work, their reliability and their daily dedication. Dinasa (Haiti) organised a discussion-debate on the theme "Women's leadership, a driver of development, towards responsible gender equality", a moment of discussion that enabled Management to congratulate its employees and commit to continuing to work towards the gender equality objective by promoting the hiring of women. In South Africa, the World LPG Association organized an event attended by many young women from different companies in the sector. An employee of the Easigas subsidiary was rewarded for her professional success. She explained, through an inspiring speech, her rise from graduation, working as a receptionist in her youth, to the position as Bulk Transport Manager she currently holds within the Group.

The Group's subsidiaries encourage the hiring of women in our male-dominated professions and fight against all forms of discrimination and sexism, in particular by ensuring that their recruitment processes, compensation policies and career management provide everyone with the same opportunities.

A company agreement was renewed within the Rubis Terminal JV in 2017. The agreement focuses on hiring, training and career development through the use of monitoring indicators. A report is presented to the central Economic and Social Council every year. The situation is positive, particularly in terms of training. The Rubis Terminal JV has set itself the target of achieving 40% women on the Group's Executive Committee by 2030.

RESULTS

The number of women employed by the Group was up 5.5% in the financial year (1,167 female employees as of 31 December 2022, compared to 1,106 as of 31 December 2021). Women employees account for 25.9% of the total headcount.

At Rubis SCA (the parent company), the majority of management positions (senior executives) are held by women.

At the Group level, 35.5% of all management positions (senior executives and managerial personnel) are held by women, i.e., a higher proportion than their percentage of total workforce. The percentage of women holding managerial or senior executive posts (30.9%) is also markedly higher than the percentage of men with equivalent responsibilities (19.6%).

	2022			2021			2020		
	Non-executives	Executives	Senior executives	Non-executives	Executives	Senior executives	Non-executives	Executives	Senior executives
Women	23.1%	37.8%	29.7%	23.1%	37.9%	27.7%	23.5%	36.9%	23.6%
Men	76.9%	62.2%	70.3%	76.9%	62.1%	72.3%	76.5%	63.1%	76.4%
HEADCOUNT	3,475	783	283	3,465	621	249	3,325	597	233

NB: Data includes the Rubis Terminal JV. Figures excluding the Rubis Terminal JV are presented in the table at the end of this section 4.4.

At the level of the governing bodies:

- 50% of the members of the Group Management Committee, which has six members, are women;
- women sitting on the Management Committees within Rubis Énergie and its subsidiaries represented 28.6% of those Committees' membership on average as of 31 December 2022 (compared to 27.4% in 2021 and 24.6% in 2020), including two female General Managers of subsidiaries in Rwanda and Cameroon. A woman is also Managing Director of the Gabon subsidiary, which is not included in the above-cited rate given the size of the entity, which does not have a Management Committee;
- the Rubis Photosol Management Committee was composed of 20% women as of 31 December 2022.

GENDER EQUALITY INDEX FOR FRENCH COMPANIES

To compare pay gaps between men and women in France, a professional equality index has been phased in for French companies with more than 50 employees by French law no. 2018-771 of 5 September 2018 on the freedom to choose one's professional future.

This index, which is scored out of 100, is calculated on the basis of four or five criteria, depending on the size of the Company's workforce:

- pay gap between men and women (40 points);
- difference in the rate of individual pay rises between men and women (35 points for companies with fewer than 250 employees; 20 points for companies with more than 250 employees);
- difference in the male/female promotion rate (15 points, only for companies with more than 250 employees);
- share of female workers receiving a pay raise following maternity leave (15 points);

- number of women represented in the top 10 compensation packages (10 points).

The headcount at the Group holding company, Rubis SCA (which includes those of Rubis Patrimoine for the purposes of monitoring social indicators), does not allow the index to be calculated on a voluntary basis (headcount below the required thresholds).

Rubis Énergie: the gender equality indices of the four French companies concerned were published in 2023, two of which increased significantly between 2021 and 2022:

- SRPP (Réunion Island): 94/100 in 2022 (identical to 2021) (learn more at www.srpp.re/INDEX%20EGAPRO%20SRPP%202023.pdf);
- SARA (French Antilles): 92/100 in 2022 (vs 81/100 in 2021) (learn more at www.sara-antilles-guyane.com/notre-demarche-rse/);
- Vitogaz France: 86/100 in 2022 (identical to 2021) (learn more at www.Vitogaz.com/Vitogazvous/rse/index-egalite-professionnelle-femme-homme);
- Rubis Antilles Guyane: 96/100 in 2022 (vs 81/100 in 2021) (learn more at www.rubis-ag.fr/egalite-pro).

For the Rubis Terminal JV, its French subsidiary reported a score of 88/100 in 2021. It reached 99/100 in 2022 (learn more at <https://www.rubis-terminal.com/>).

In addition, in 2022, Maritec Tanker Management Pvt Ltd (MTM PL), a subsidiary of Rubis Énergie, integrated two women sailors into its workforce for the first time. They joined the Morbihan vessel, recently acquired by the Group.

4.4.1.2 Geographical diversity

Operating in over 40 countries and with more than 68 nationalities in its workforce, Rubis is keen to capitalise on the rich cultural diversity of its employees and make an impact in the regions in which it operates. Employees are split equally between Africa, the Caribbean and Europe in terms of activities. In order for this cultural diversity to be reflected in corporate culture and management, when acquiring foreign subsidiaries, the Group tries to retain and/

or hire local employees for their experience and knowledge of the country: **more than 98% of Group employees are hired locally**. Thus, only two positions are generally occupied by expatriates in subsidiaries, those of General Managers and Chief Financial Officer. The percentage of expatriates on the subsidiaries' various Management Committees was 18.6% in 2022 (20.7% excluding the Rubis Terminal JV).

GEOGRAPHICAL BREAKDOWN OF EMPLOYEES

	2022	2021	2020
Africa	40.4%	40.7%	40.4%
Caribbean	28.1%	28.3%	31.9%
Europe	31.5%	31%	27.7%

NB: Data includes the Rubis Terminal JV. Figures excluding the Rubis Terminal JV are presented in the table at the end of this section 4.4.

4.4.1.3 Intergenerational diversity

The Group's age pyramid shows that the Group has broad intergenerational diversity in its headcount, which greatly enhances the experience of its teams and the transfer of knowledge. Each age group is represented in a relatively equal way, without any significant variations between business lines and regions. The Group has set up an active

training policy in order to anticipate the retirement of senior employees. Furthermore, the Group contributes to the integration of young people into the job market by recruiting interns, students under apprenticeship or professionalisation contracts and recent graduates.

BREAKDOWN OF EMPLOYEES BY AGE GROUP

	31/12/2022				31/12/2021				31/12/2020			
	Between < 30 years	Between 30 and 39 years	Between 40 and 49 years	≥ 50 years	Between < 30 years	Between 30 and 39 years	Between 40 and 49 years	≥ 50 years	Between < 30 years	Between 30 and 39 years	Between 40 and 49 years	≥ 50 years
Rubis SCA/Rubis Patrimoine	12%	16%	36%	36%	8.3%	20.8%	37.5%	33.3%	12.5%	29.2%	33.3%	25.0%
Rubis Énergie (Retail & Marketing/Support & Services)	11.9%	32.2%	30.8%	25.1%	12.1%	33.0%	30.2%	24.7%	13.4%	34.6%	29.5%	22.5%
Rubis Photosol	50%	29.5%	16.1%	4.4%	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL EXCLUDING THE JV	13%	32%	30.4%	24.6%	12.1%	32.8%	30.3%	24.8%	13.4%	34.6%	29.5%	22.5%
Rubis Terminal JV	11%	25.1%	32.6%	31.3%	10.6%	25.2%	35.6%	28.6%	12.5%	28.0%	32.7%	26.4%
TOTAL INCLUDING THE JV	12.7%	31.1%	30.7%	25.5%	11.8%	31.8%	31.2%	25.2%	13.3%	33.8%	29.9%	23.0%

To retain this intergenerational dynamic and maintain proximity between younger and older employees, Rubis Énergie and the Rubis Terminal JV have introduced practices favouring seniors in France.

Since intergenerational diversity is key to social cohesion between all generations, Rubis Énergie prioritises:

- anticipating career development;
- developing skills and qualifications;
- transmitting knowledge and developing mentoring.

As of 31 December 2022, 34 people on work-study contracts (alternant) and 120 interns worked at Rubis Énergie, as well as three people on work-study contracts and 13 interns at Rubis Photosol.

The Rubis Terminal JV has committed to:

- keeping employees aged 55 and over in the workforce;
- training in ergonomics;
- paying part of the cost of qualifications that certify skills learned through experience.

Regarding young employees, the Group encourages combined work-study programmes, which it views as a very suitable tool for bringing young people into the professional world.

4.4.1.4 Disability

The Group has adopted a policy of openness favouring disabilities, which includes funding associations and institutions working in healthcare as part of its social engagement activities (see section 4.5.2.3).

Within Rubis Énergie, several subsidiaries use supply, subcontracting or service contracts with establishments and services assisting disabled people through work (*Établissements et Services d'Aide par le Travail*, ESAT) or a company employing a minimum number of disabled employees (*Entreprise Adaptée*, EA). At the same time, recruitment firms are asked to ensure that each job opening is accessible to people with disabilities.

For example, at Rubis Antilles Guyane, hiring for various leave replacements is conducted through Cap Emploi, which works with individuals with disabilities, allowing integration into the Company and which can lead to permanent employment, if needed.

In South Africa, the law (Employment Equity Act) requires companies to ensure that people with a disability make up at least 2% of their workforce. Individuals with disabilities account for over 4% of Easigas's workforce.

From 14 to 20 November 2022, SARA observed the European week for the employment of people with disabilities, at all its sites. The Quality of Life at Work Department organised an awareness-raising event on the issue of lifelong, temporary and sudden disabilities. Employees were able to attend visually-impaired lunches, a play called "*Conte-moi le handicap*" with the El Lobo Bueno association, DuoDays and information workshops. The aim was to change the way people see each other in order to value employees who have disabilities. Employees greatly appreciated the week's programme, and the various events were very well attended.

At SRPP (Réunion Island), a day to raise awareness of disability was organised on 26 October 2022. Some 30 employees were able to try out various fun activities offered by around 20 specialists in the field of motor, visual, auditory and mental disabilities: tasting and visually-impaired tour, introduction to sign language, creation of paintings, and practising a sport in a wheelchair. These workshops were led by testimonials from people with

disabilities who came to share their professional experience in order to convey a strong positive message. The primary objective of this awareness-raising action was to highlight different types of disabilities, but also to communicate and discuss the adaptations necessary to integrate people with disabilities.

In addition, Vitogaz France sought to strengthen its commitments with respect to integrating and maintaining employment for people with disabilities. As part of its desire to promote diversity and equal opportunity, the company has committed to implementing an employment policy for people with disabilities, based on five pillars;

- facilitating the recruitment and integration of people with disabilities;
- maintaining employment of people with disabilities;
- developing training initiatives that will make it possible to achieve or facilitate the integration of disabled workers;
- integrating ESATs into the company's purchasing policy as far as possible;
- raising individual awareness through dynamic communication about how disabilities are perceived.

To carry out these actions, a disability correspondent was appointed in 2021.

The Rubis Terminal JV has also signed partnership agreements with ESATs and sheltered workshops.

For instance, for more than 20 years, the Rubis Terminal JV Company headquarters has been sourcing office supplies and maintenance products from establishments that employ disabled workers under the auspices of the Commission for Rights and Autonomy of People with a Disability (CDAPH).

In order to promote the integration of people with disabilities, by 2023, 100% of the General Management bodies and Human Resources Departments will receive training on the fight against preconceptions about people with disabilities, and by 2025, 100% of our employees will receive awareness-raising on this issue.

4.4.2 Developing skills / NFIS /



RISKS

The Group is convinced of the importance of developing its employees, whether through knowledge enhancement or diversification of experiences. The ongoing improvement of individual skills helps motivate teams, encourages coming up with innovative ideas, and boosts employee efficiency and employability. It also makes Group service quality durable and increases safety at facilities.

In addition, in line with internationally defined development priorities, Rubis is attentive to the consequences of energy transition on the workforce and the creation of decent work and high-quality jobs. The principles of a just transition for workers consist of attractiveness and development of talent, including workers in the just transition process, and supporting and training workers.

To do so, Rubis committed in its CSR Roadmap, Think Tomorrow 2022-2025, to training 10% of employees each year on changes in our businesses (energy transition, CSR, etc.) by 2025.

MEASURES TAKEN

The enhancement of employee skills contributes to the Group's performance and employee development. It is with this in mind that training objectives have been defined.

An e-learning platform was developed in 2021 and put online in March 2022. The first module is dedicated to preventing corruption. The platform will be supplemented with other training modules as necessary.

Training as a means of moving forward

In accordance with the wishes expressed by employees, the Group invests in general training to upgrade and enhance employees' skills throughout their careers.

Rubis Énergie and the Rubis Terminal JV have set up a wide range of training courses that are adapted to their own specific challenges:

- **language training;**
- **management training;**
- **functional training:** training in law, customs, pay systems, etc.;
- **training on changes in our business lines** (energy transition, CSR, etc.).

Training as a means of preventing risk

Concerned about protecting the physical integrity of its employees while performing their duties, the Group is investing in:

- **health**, through providing training in ergonomics for jobs that carry risks to employee health, as well as safety

training for different "at risk" jobs aimed at staff and external workers, product training (welding, chemical product handling), workplace first aid and rescue, etc.;

- **industrial safety**, with the assistance of professional bodies such as the GESIP (*Groupe d'Étude de Sécurité et Chimiques* – Group for Safety Research in the Petroleum and Chemical Industries). These training courses are designed to continually improve the safety of people and facilities at industrial sites in an environmentally friendly manner;
- **road safety**, to reduce the risk of road accidents in regions with poor quality road infrastructure and/or generally inadequate driver training (defensive driving) (see section 4.2.3.2.1);
- the **environment** and quality (incorporation of ISO standards);
- **verifying systems designed to protect facilities** (tank maintenance, training in operating fire-fighting systems, etc.);
- **partnerships** with providers, such as the Association for Prevention in the Transport of Petroleum Products (*Association pour la prévention dans le transport d'hydrocarbures* – APTH), which provides training and assistance to safety advisors, the Association of Training in Fuel Trading (*Association de formation dans le négoce des combustibles* – Asfoneco), the Red Cross, etc.

RESULTS

This year, the number of training hours increased sharply: 81,151 training hours (+32.7% compared to 2021 and +57.3% compared to 2020) were delivered within the Group in 2022, some of which remotely. The number of employees who received training increased by 9.8% compared to 2021 and by 36.2% compared to 2020. The proportion of employees receiving training was 90.1% at Rubis Énergie (Retail & Marketing and Support & Services activities) and 82.6% within the Rubis Terminal JV.

Notably, these training needs were able to be identified during annual reviews. In 2022, 91.3% of employees had a review meeting with their line Manager. In 2022, the number of training hours per employee trained increased by approximately 21% (20.8 hours/employee trained in 2022 vs 17.2 hours/employee trained in 2021).

NUMBER OF TRAINING SESSIONS DELIVERED AND EMPLOYEE BENEFICIARIES

	2022			2021			2020		
	Total number of training hours	Number of beneficiaries	Percentage of employees trained	Total number of training hours	Number of beneficiaries	Percentage of employees trained	Total number of training hours	Number of beneficiaries	Percentage of employees trained
Rubis SCA/Rubis Patrimoine	553	21	84%	190	21	87.5%	201	8	33.3%
Rubis Énergie (Retail & Marketing/Support & Services)	68,040	3,414	90.1%	48,212	3,036	82.4%	42,683	2,504	68.0%
TOTAL EXCLUDING THE JV	68,593	3,435	90.1%	48,402	3,057	82.4%	42,884	2,512	67.8%
Rubis Terminal JV	12,558	473	82.6%	12,740	502	80.1%	8,694	357	79.6%
TOTAL INCLUDING THE JV	81,151	3,908	89.1%	61,142	3,559	81.7%	51,578	2,869	69.1%

In general, risk prevention efforts continued, with 68% of employees trained in health and safety (54% in 2021 and 40% in 2020).

NUMBER OF EMPLOYEES TRAINED IN HEALTH AND SAFETY

	2022	2021	2020
Rubis Énergie (Retail & Marketing/Support & Services)	2,530	1,845	1,383
Rubis Terminal JV	444	501	276
TOTAL	2,974	2,346	1,659

PERCENTAGE OF EMPLOYEES TRAINED IN CHANGES IN OUR BUSINESS LINES (ENERGY TRANSITION, CSR, ETC.) (RUBIS ÉNERGIE SCOPE)

	2022	2021	2020
Rubis Énergie (Retail & Marketing/Support & Services)	28%	NA	NA

4.4.3 Ensuring health, safety and quality of life at work / NFIS /



4.4.3.1 Health and safety

The Group puts personal health and safety at the very heart of its social policy. These risks affect both employees and staff from outside companies, as well as customers and

local residents living near sites operated by Group entities. This subject is addressed in section 4.2.3.2.

4.4.3.2 Quality of life at work

RISKS

The Group is conscious of the importance of offering its employees working conditions that allow them to reach their full potential. This is an essential condition for the motivation, cohesion and stability of the teams. It is a

performance lever that helps foster long-term employee commitment.

Moreover, employee commitment is very much dependent on the ability of Senior Managers to help new employees

settle in, make their teams understand what the Company expects of them, how their work contributes to the Group's success, to be respectful and attentive to the needs of each individual and to develop the collective intelligence and mutual listening skills required for any relationship built on trust.

Lastly, social protection cover for employees aims to protect them from the potentially significant financial impacts of illness or accidents.

MEASURES TAKEN

Labour relations

Rubis' relations with all its employees are based on listening, dialogue and mutual respect. Every subsidiary has open and constructive relations with employee representative bodies where they exist (mainly in companies operating in France). Collective agreements notably cover wages and salaries, the company savings plan, incentives, profit-sharing, gender equality and training (see section 4.4.4).

Collective agreements are entered into with the aim of achieving positive outcomes, including with respect to employees' working conditions and the Company's economic performance. High-quality labour relations have a direct effect on the success of developments to be made within the Company in order to adapt to an evolving environment.

In France, all Rubis Énergie and Rubis Terminal JV employees are covered by a collective agreement. The employees of Rubis SCA, the parent company, are not covered by a collective agreement due to the small number of employees and the Company's status as a holding company.

Moreover, numerous measures are unilaterally taken on health and safety issues in accordance with rules established by the Group and after consultation with employee representative bodies.

Rubis Énergie has set the following targets with the aim of maintaining a working environment that is conducive to the well-being of its employees and employee retention:

- stabilise headcount and jobs at constant scope;
- keep its absenteeism rate for non-occupational illnesses at under 2%.

Monitoring psychosocial risks

The Group specifically targets the prevention of psychosocial risks, knowing that doing so improves quality of life at work. During the lockdown periods related to the Covid-19 pandemic, which led many Group employees to work remotely, sometimes for long periods in 2020, increased vigilance was paid to employee well-being. Measures, such as regular newsletters, were put in place, as well as training on working in confined spaces or training on preventive measures against the Covid-19 pandemic.

A psychosocial risk assessment is conducted in certain subsidiaries and is updated on a regular basis in order to better prevent against these situations. In addition, to

encourage the detection of potential risks, Group employees and external and temporary employees can securely report any harassment via the whistleblowing line that is being rolled out in the Group's subsidiaries (Rubis Integrity Line) as well as through traditional reporting channels (line management, HR, employee representatives) (see section 4.5.1.1).

Work commitment

The Group encourages initiatives that promote dialogue and team spirit. These include:

- the organisation of team-building events to foster employees' team spirit. For example, within Rubis Énergie, many subsidiaries organise end-of-year meals with all employees, sometimes with their families. Sports activities, seminars, after work events, *galettes des rois* parties and workshops are also organised;
- at Galana (Madagascar), in December 2022, an HSSE team-building was organised involving around 20 employees from different departments, in particular the first aid team members. The participants were put to the test through fun and cultural activities related to HSSE aspects;
- Rubis Energia Portugal organised a day of activities for its staff on 27 May 2022. The Rubis Padel Day event consisted of a padel tournament and other sports activities such as pilates, bootcamp, zumba, etc. This event promoted team spirit and celebrated the opportunity to be together after these long periods of lockdown. Employees also had the opportunity to experience Rubis' values through a flash mob on the Rubis Gas song;
- on Réunion Island, SRPP organised its traditional convention, after a two-year break due to Covid. Following lunch at a restaurant, the afternoon was punctuated by an escape game on the Saint-Gilles beach, led by a team of actors;
- the launch of a digital collaborative platform, Rubis Team, to facilitate interaction among Rubis SCA and Rubis Énergie employees working on different continents. This tool streamlined exchanges and encouraged a sense of belonging to the Group, and really proved its effectiveness during the pandemic, which led to long periods of working from home for a large number of employees;
- the implementation of artistic projects for employees, helping to establish a culture of well-being, stimulate employees' creativity and improve their working environment;
- employee involvement in the artistic projects carried out by Rubis Mécénat, the Group's endowment fund, on or in connection with the Group's industrial sites (see section 4.5.2.3);
- involving employees in the realisation of sustainable sociocultural projects. For example, Rubis Mécénat has involved employees in projects such as "Of Soul and Joy" in South Africa (photography programme aimed at young people in townships), the "InPulse" art project in Jamaica

(creative visual arts platform), and “*Ndao Hanavao*” in Madagascar (social design innovation lab) (see section 4.5.2.3);

- seeking employees’ assistance with community projects. These types of initiatives are conducted locally in most subsidiaries (sponsorship or fund-raising, support for charitable associations and the organisation of local community events, etc.) (see section 4.5.2.3);
- highlighting employees’ work (celebrating successes at internal events, etc.).

Social protection cover for employees outside France

Mindful of the role that social protection cover can play in combating inequality and the importance of protecting its employees’ health, the Group strives to offer coverage for employees working in countries where coverage is not mandatory.

As of 31 December 2022, 98.3% of the Group’s employees had health coverage, whether mandatory or not. In countries that do not mandate health insurance cover, the subsidiaries have voluntarily set up plans to cover healthcare costs. In addition, 90% of employees benefit from provident insurance thanks to 214 social security or provident insurance agreements in force.

At Rubis Énergie, contributions to private social protection insurance (provident, healthcare) are made at the employer’s initiative for employees working outside France, except in foreign subsidiaries that had implemented such arrangements prior to being acquired by the Group.

Within the Rubis Terminal JV, employer contributions are made to provident and private health insurance funds for employees working outside France.

Organisation of working hours

Not all of the Group’s activities allow for flexible working hours. As activities are varied, the majority of employees working on our industrial sites hold “shift” jobs, thus carrying out a continuous activity with shifts between teams to ensure production (3x8). Managers, on the other hand, who carry out a more traditional office activity, benefit from more flexible working hours.

In addition, the pandemic that affected us in 2020 has created a profound change in the way we approach work and schedules. In France in particular, agreements on teleworking have been signed for categories of employees with suitable jobs.

Percentage of employees covered by company agreements

Sixty-three collective agreements, company agreements or unilateral decisions were signed at Rubis Énergie in 2022, covering more than 1,200 employees. At the Rubis Terminal JV, 50 collective agreements, company agreements or unilateral employer decisions were signed in 2022, covering 305 employees.

RESULTS

Indicators regarding employee turnover and absenteeism are used to assess changes in the labour relations context and the motivation of employees in subsidiaries.

The monitoring of employee turnover shows that the Group maintained a dynamic recruitment policy in 2022. Net job creations (number of new hires less all departures) totalled 147 (including 22 within the Rubis Terminal JV).

EMPLOYEE TURNOVER IN 2022

	Hires			Resignations			Dismissals			Departure by mutual agreement		
	2022	2021	2020	2022	2021	2020	2022	2021	2020	2022	2021	2020
Rubis SCA/Rubis Patrimoine	1	1	3	0	0	1	0	0	0	0	0	0
Rubis Énergie (Retail & Marketing/ Support & Services)	577	488	530	234	172	109	73	70	85	55	46	50
Rubis Photosol	42	NA	NA	8	NA	NA	4	NA	NA	3	NA	NA
TOTAL EXCLUDING THE JV	620	489	533	242	172	110	77	70	85	58	46	50
Rubis Terminal JV	87	67	50	28	25	7	8	7	9	8	5	4
TOTAL INCLUDING THE JV	707	556	583	270	197	117	85	77	94	66	51	54

The rate of absenteeism due to non-occupational illness and the rate of unjustified absences remain relatively stable at a very low level, with the exception of the Rubis Terminal JV, where a large number of employees are on leave for long-term illnesses.

ABSENTEEISM NOT RELATED TO AN OCCUPATIONAL ACCIDENT OR ILLNESS*

	Absences not due to occupational illness			Unjustified absences		
	2022	2021	2020	2022	2021	2020
Rubis SCA/Rubis Patrimoine	0.56%	0.16%	0.32%	0%	0%	0%
Rubis Énergie (Retail & Marketing/Support & Services)	2.17%	1.81%	1.84%	0.06%	0.05%	0.03%
Rubis Photosol	1.86%	NA	NA	1.14%	NA	NA
TOTAL EXCLUDING THE JV	2.15%	1.80%	1.83%	0.09%	0.05%	0.03%
Rubis Terminal JV	7.10%	5.93%	6.07%	0%	0%	0.05%
TOTAL INCLUDING THE JV	2.71%	2.34%	2.06%	0.08%	0.04%	0.03%

* Days lost as a percentage of total working days per year.

4.4.4 Involving employees in the Group's value creation / NFIS /



RISKS

Failure to involve employees in the Group's value creation could impact their commitment to work and hence the Group's performance. For this reason, Rubis seeks to compensate the active contribution by employees to the Group's economic and financial performance so that they benefit from this value creation, through its compensation policy and/or capital increases reserved for employees.

MEASURES TAKEN AND RESULTS

Wage increases

Employees receive a basic salary and additional compensation based on individual performance (variable salary, bonuses). Basic salaries and wages are regularly reviewed in light of individual performance and changes in the cost of living. For the most part, decisions on pay are decentralised and are made by each operating subsidiary.

In 2022, 64.2% of employees received a pay rise. Regardless of the category (non-executives, executives or senior executives), the rate of employees receiving a salary increase was uniform overall, with a higher proportion for non-managers (66.2%).

PERCENTAGE OF EMPLOYEES RECEIVING A PAY RISE

	2022						2021						2020					
	Non-executives		Executives		Senior executives		Non-executives		Executives		Senior executives		Non-executives		Executives		Senior executives	
(In %)	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W
By gender	66.3	65.8	62.4	55.7	46	72.6	51.3	51.3	49.2	53.1	36.7	53.6	49.6	58.0	49.1	46.1	47.8	58.2
By category	66.2		59.8		53.9		51.3		50.7		41.4		51.6		50.2		50.2	
TOTAL HEADCOUNT	64.2						51						51					

NB: Data includes the Rubis Terminal JV. Figures excluding the Rubis Terminal JV are presented in the table at the end of this section 4.4.

M = Men.
W = Women.

Profit-sharing and incentive agreements

In accordance with French law, Rubis Énergie and the Rubis Terminal JV have introduced incentive and profit-sharing arrangements. Rubis SCA only has an incentive arrangement. In 2022, employees were able to benefit from these schemes.

Employee savings and shareholding plans

Employee shareholding is one of the pillars of the Group's compensation policy. It strengthens employees' sense of belonging to the Group and enables employees to be awarded in line with its performance.

The Group's French subsidiaries have company savings plans. Rubis SCA has also set up a mutual fund (Rubis Avenir) that invests in Rubis shares, through which employees of the Group's French companies that are at least 50% owned by the Group (including eligible employees of the Rubis Terminal JV) can subscribe for annual capital increases. As of 31 December 2022, Rubis Avenir held 1.66% of Rubis' share capital.

In 2022, 48.5% of eligible employees took part in this issue (66.3% in 2021).

Incentive plans

The award of long-term incentivising compensation (performance shares, stock options) aims to acknowledge the positive contributions made by certain high-potential Group executives and Senior Managers around the world to implementing the Group's strategy and to the Group's growth. This sort of compensation is a human resources tool that allows Rubis to attract and retain talents. The plans involve only a small portion of the capital and are subject to demanding performance conditions. It is important to note that Rubis SCA's Managing Partners do not benefit from this type of compensation.

The characteristics of these plans and their performance conditions are described in detail in chapter 6, section 6.5.

4.4.5 Consolidated social data – Group scope

	2022	2021	2020	2021/2022 change
Total headcount	4,498	4,335	4,142	+3.8%
Rubis SCA/Rubis Patrimoine	25	24	24	+4.2%
Rubis Énergie	3,788	3,685	3,669	+2.8%
Rubis Photosol	112	NA	NA	NA
Rubis Terminal JV	573	626	449	-8.5%
Headcount by region				
Africa	1,818	1,763	1,675	+3.1%
Caribbean ⁽¹⁾	1,263	1,242	1,322	+1.7%
Europe (excluding the Rubis Terminal JV)	844	704	696	+19.9%
Total France (including French overseas departments, territories and collectivities) ⁽²⁾	874	754	753	+15.9%
Europe – Rubis Terminal JV	573	626	449	-8.5%
• of which France – Rubis Terminal JV	305	296	282	+3%
Headcount by gender				
Women	1,167	1,106	1,049	+5.5%
• of which the Rubis Terminal JV	101	119	80	-15.1%
Men	3,331	3,229	3,093	+3.2%
• of which the Rubis Terminal JV	472	507	369	+6.9%
Headcount by age⁽³⁾				
< 30 years	571	513	551	+11.3%
• of which the Rubis Terminal JV	63	66	56	-4.5%
30 to 39 years	1,397	1,380	1,399	+1.2%
• of which the Rubis Terminal JV	144	158	125	-9.2%
40 to 49 years	1,378	1,345	1,239	+2.4%
• of which the Rubis Terminal JV	187	223	147	-16.4%
≥ 50 years	1,144	1,097	953	+4.3%
• of which the Rubis Terminal JV	180	179	120	+0.3%
Headcount by job category⁽³⁾				
Non-executives	3,475	3,465	3,314	+0.3%
• of which the Rubis Terminal JV	459	512	347	-10.4%
Executives	732	621	597	+17.9%
• of which the Rubis Terminal JV	66	64	55	+3.1%
Senior executives	283	249	230	+13.7%
• of which the Rubis Terminal JV	48	50	45 ⁽⁴⁾	-4%
Non-permanent employees (vessel crews)	225	84	NA	+167.9%
New hires				
Number of recruitments	707	556	583	+27.1%

	2022	2021	2020	2021/2022 change
• of which the Rubis Terminal JV	87	67	50	+29.9%
Departures				
Resignations	270	197	117	+37.1%
• of which the Rubis Terminal JV	28	25	7	+12%
Dismissals	85	77	94	+10.4%
• of which the Rubis Terminal JV	8	7	9	+14.3%
Departure by mutual agreement	66	51	54	+28.4%
• of which the Rubis Terminal JV	8	5	4	+60%
Absenteeism rate				
Due to illness (non-occupational)	2.71%	2.34%	2.06%	-
• of which the Rubis Terminal JV	7.10%	5.93%	6.07%	-
Due to occupational illness	0.01%	0.04%	0%	-
• of which the Rubis Terminal JV	0.10%	0.2%	0%	-
Due to occupational accidents	0.15%	0.07%	0.09%	-
• of which the Rubis Terminal JV	0.36%	0.17%	0.22%	-
Unjustified absences	0.08%	0.04%	0.03%	-
• of which the Rubis Terminal JV	0%	0%	0.05%	-
Workplace health and safety				
Occupational accidents with lost time > 1 day not leading to death	45	35	41	+28.6%
• of which the Rubis Terminal JV	13	8	9	+62.5%
Occupational accidents leading to death	0	1	0	-100%
• of which the Rubis Terminal JV	0	0	0	0%
Occupational illnesses	1	2	1	-50%
• of which the Rubis Terminal JV	0	1	0	-100%
Occupational accident frequency rate per million hours worked	5.8	4.6	5.5	+26.1%
• of which the Rubis Terminal JV	14.3	9	11.9	+58.8%
Occupational accident frequency rate per 200,000 hours worked	1.2	0.9	1.1	+26.1%
• of which the Rubis Terminal JV	2.9	1.8	2.38	+58.8%
Working hours⁽³⁾				
Full time	4,426	4,275	4,104	+3.5%
• of which the Rubis Terminal JV	541	595	440	-9.2%
Part time	64	60	38	+6.7%
• of which the Rubis Terminal JV	32	31	9	+3.2%
Of which shift work	652	725	537	-10.1%
• of which the Rubis Terminal JV	205	219	125	-6.4%
Training				
Number of training hours	81,151	61,142	51,578	+32.7%
• of which the Rubis Terminal JV	12,558	12,740	8,694	-1.4%
Number of employee beneficiaries	3,908	3,559	2,869	+9.8%
• of which the Rubis Terminal JV	473	502	357	-5.8%
Salary increases				
Percentage of total headcount	64.2%	51.0%	51.0%	-
• of which the Rubis Terminal JV	50.57%	53.6%	62.0%	-
Percentage of employees with salary increases per job category				
Non-executives	66.2%	51.3%	51.6%	-
• of which the Rubis Terminal JV	50.9%	52.75%	62.6%	-
Executives	59.8%	50.7%	48.0%	-
• of which the Rubis Terminal JV	51.5%	74.4%	88.3%	-
Senior executives	53.9%	41.4%	50.2%	-
• of which the Rubis Terminal JV	46.9%	38.0%	26.7%	-
Percentage of employees with salary increases per gender				
Women	63.7%	51.9%	55.6%	-
• of which the Rubis Terminal JV	52.5%	48.3%	56.9%	-
Men	64.4%	50.2%	51.0%	-
• of which the Rubis Terminal JV	50.2%	44.5%	51.9%	-

(1) Until 2020, non-permanent employees (vessel crews) were accounted for in the Caribbean zone. In the context of the restructuring of its CSR approach, Rubis decided to put in place differentiated monitoring indicators in order to take the specificities of managing these teams in to account.

(2) Employees in France are included in the headcount of the regions to which they are assigned (Europe, for mainland France, the Caribbean for Guadeloupe, Martinique and French Guiana, and Africa for Réunion Island). The total is therefore higher than the total for Europe.

(3) This indicator is reported on 99.98% of the workforce; four entities, due to a small workforce (three or less employees) representing a total of eight employees, are not included.

(4) Correction of an error in the URD 2020 (45 replacing 31 in 2020).

4.5 Working responsibly and with integrity

Operating its businesses responsibly and with integrity is a core issue for Rubis in terms of fulfilling its commitments and protecting its image, reputation and employees. The Group is built on values that have fashioned its culture and driven its success: integrity, respect for others, professionalism and trust are all principles that the Group aims to apply across all its activities to ensure its sustainability. These internal principles, which are rooted in its strong corporate culture, also encourage employees to become involved in the social and economic fabric surrounding them by adopting responsible and supportive behaviour.

Because the Group is present in over 40 countries in Europe, the Caribbean and Africa, the prevention of corruption is a major issue for the Group (section 4.5.1.1). The Group also endeavours to extend its principles of responsibility to its value chain and to gradually introduce a responsible purchasing policy with the aim of having common standards for leading by example (section 4.5.1.2). Lastly, the Group's subsidiaries attach great importance to dialoguing with stakeholders and promoting dynamism in the regions where they operate, both in terms of the economy and employment and in terms of culture and community living (section 4.5.2).

4.5.1 Rubis' ethics policy

The Group considers ethics to be an asset that is key to its reputation and loyalty. Integrity is one of the central pillars of the Group's approach to ethics (section 4.5.1.1), as is the Group's commitment to respecting its employees' fundamental rights (section 4.5.1.2).

4.5.1.1 Fair practices



Personal integrity is key to ensuring exemplary collective behaviour. It is the safeguard against wrongdoing that could harm the Company, employees, business relationships or any other external public or private actor.

Gilles Gobin and Jacques Riou
Managing Partners of the Rubis Group

RUBIS' CODE OF ETHICS

Collective and individual commitment is indispensable to adopting ethical behaviours that meet the Group's values. To ensure that the rules of conduct are shared and complied with by all, Rubis has included within its Code of Ethics a common framework for all its subsidiaries, including the Rubis Terminal JV.

This Code of Ethics (which is accessible to the public through the Group's website: www.rubis.fr/en) lays down the values that Rubis considers to be fundamental:

- compliance with applicable laws and regulations wherever the Group operates;
- fighting against corruption, fraud, misappropriation of funds and money laundering;
- preventing conflicts of interest;

- complying with competition, confidentiality and insider trading rules, as well as with specific laws that apply to war and/or embargo zones;
- respecting individuals, including by observing fundamental rights and human dignity, safeguarding privacy, and fighting against discrimination and harassment;
- complying with workplace health and safety rules and environmental protection rules;
- managing relationships with external service providers;
- reliability, transparency and auditability of accounting and financial information;
- protecting the Group's image and reputation.

In each of these areas, the Rubis Code of Ethics details the general principles that employees must observe while performing their duties. The Code of Ethics is furnished to new arrivals. Subsidiaries organise training sessions to explain the Code's contents and to answer employees' questions. The Group CSR & Compliance Department is the point of contact for subsidiaries and employees on ethics issues. This Code of Ethics, dating from 2015, is currently being revised to better reflect the development of the Group's CSR approach and societal challenges. The new version will be published in 2023.

FIGHTING CORRUPTION / NFIS /

Programme measures

In line with its values and applicable legislation, and in particular the law on transparency, fighting corruption and modernising the economy of 9 December 2016 (known as the “Sapin II law”), Rubis is putting into practice its commitment to fight against corruption in all its forms as described in its Code of Ethics, by gradually introducing a comprehensive anti-corruption programme. To date, this programme is made up of the following measures:

- **the anti-corruption guide**, which supplements the Code of Ethics. This guide (which is accessible to the public on the Group's website: www.rubis.fr/en/) aims to help the most exposed senior executives and employees identify at-risk situations and adopt the related practical preventive measures. The guide was updated in 2021 to make it more educational and to take into account the results of corruption risk mapping;
- **third-party assessment guidelines**, to help operating staff identify third parties that may present risks, perform appropriate due diligence and implement suitable measures. These guidelines are being updated;
- **corruption risk mapping**: this analysis was conducted at the operating entity level by subsidiary Managers based on a unified methodology and meetings involving the subsidiaries' core functions (purchasing, sales, operations, HR, finance, compliance, etc.). A one-day seminar bringing together all the subsidiaries' Compliance Advisors was organised in November 2019 to familiarise them with the mapping methodology. Risk hierarchisation resulted in an additional review in 2020. This mapping process resulted in the identification of action plans. Since 2021, the risk mapping of the operational entities is reviewed each year and is fully updated every three years;
- **regular awareness and training campaigns in respect of ethics and anti-corruption rules** in all Group subsidiaries aimed at employees in the most sensitive positions and, in some subsidiaries, for all employees. An online training module (e-learning) on preventing and detecting corruption was made available to the Group's operational entities in the first quarter of 2022. As of 31 December 2022, 61% of Group employees had validated the e-learning “Preventing and detecting corruption”. Lastly, actions to raise awareness of the Group's employees about the risks of corruption are rolled out each year on the occasion of the Global Anti-corruption Day, celebrated on 9 December each year, in order to remind people of the Group's commitments in the fight against corruption;
- **a global whistleblowing system**, the Rubis Integrity Line, was established in 2018 and has been rolled out in all Group entities. It allows all Group employees and external and occasional employees to securely and confidentially make a report using an outsourced internet platform. These reports can relate to acts of corruption or other

ethical issues (environment, security, fraud, personal data, human rights, etc.) and, more generally, to any situation or conduct that may be contrary to the Code of Ethics. The system's overall architecture was designed to provide a means of filing these reports and processing them internally, while ensuring complete confidentiality. The rules that govern the use of the Integrity Line set out whistleblowers' rights and responsibilities so that the system can operate smoothly in a climate of trust. In particular, in the rules, the Group reminds users that whistleblowers will be protected against any retaliation. To support the rollout of the Integrity Line, an educational kit was distributed to the Compliance Advisors, and communication initiatives are carried out regularly (Group “Think Compliance” newsletter, subsidiary newsletters, training, etc.). In 2022, the Group received 11 alerts via the system, of which 10 related to human resources issues and one related to a potential conflict of interest. To take into account the changes to the regulations that took place in the fourth quarter of 2022 as part of the transposition of Directive (EU) 2019/1937, the update of the alert procedure is underway;

- **modification of entities' internal rules or employee handbooks** (after informing/consulting staff representative bodies, where appropriate) to include specific language stating that a failure to comply with the Code of Ethics or the anti-corruption handbook may lead to **disciplinary sanctions**. In 2022, 21 disciplinary actions were taken for fraud or non-compliance with ethics or anti-corruption rules, some of which resulted in dismissals;
- **an internal accounting control framework** (see chapter 3, section 3.2);
- **assessing that the programme's measures are being implemented**: the internal control risk management system (described in chapter 3, section 3.2.3) includes checks on the application of the Group's main ethics and anti-corruption rules. In addition, each subsidiary reports annually to the Group CSR Director & Chief Compliance Officer on the progress of the programme's deployment. The digital non-financial data collection platform has been used since 2020 for this reporting in order to improve the reliability of the reported information.

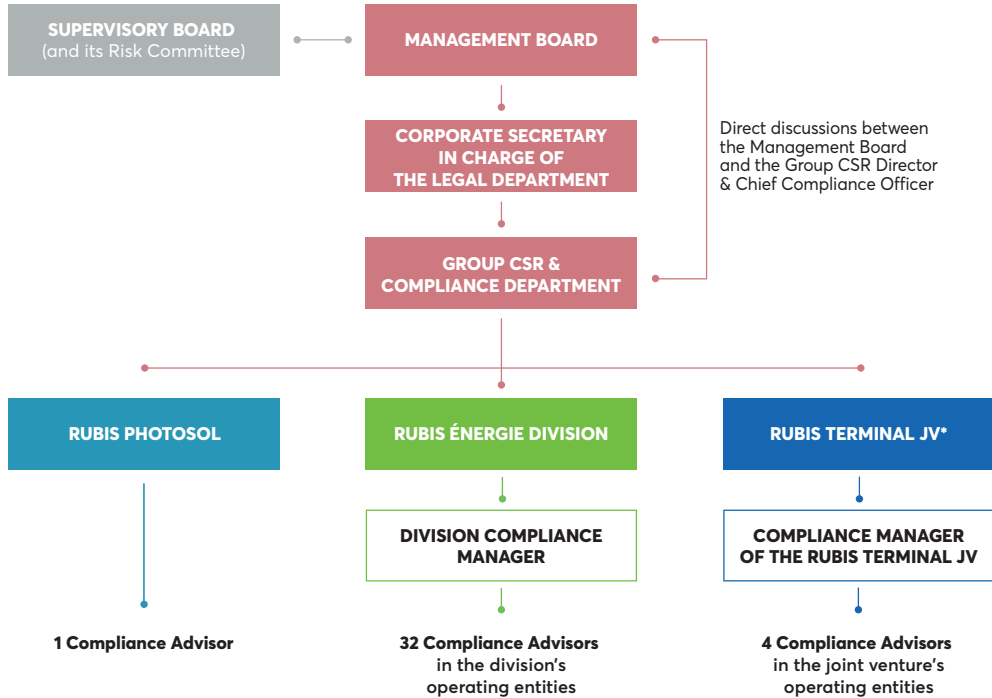
Compliance governance

The Group and its management bodies have made the prevention of corruption one of their priorities. Since 2016, the Management Board's variable compensation includes an ethics criterion that relates to the implementation of the programme across all entities.

The Group's CSR Roadmap, Think Tomorrow 2022-2025 (which is publicly accessible on the Group's website at www.rubis.fr/en/) published in 2021, includes compliance within its third pillar, “Contributing to a more virtuous society”. In particular, the Think Tomorrow Roadmap sets the target of having 100% of employees made aware of ethics and anti-corruption by 2023.

In 2022, 90% of employees were covered by an awareness-raising campaign and 90% of the subsidiaries' General Managers declared they had participated in an internal anti-corruption initiative or event.

COMPLIANCE GOVERNANCE



* Joint control by the Rubis SCA and I Squared Capital.

A specific organisation was put in place to support the roll out and monitoring of the anti-corruption programme:

- **the Group CSR Director & Chief Compliance Officer**, who reports to the Rubis Corporate Secretary, and whose main role is to define the Group's policies and procedures in the area of ethics and compliance and to support, together with the entities, the deployment and implementation of these policies and procedures within the Group. The Group CSR Director & Chief Compliance Officer proposes enhancements to the programme by incorporating strategic challenges, best practices and regulatory developments, and regularly reports on her work to the Management Board and to the Accounts and Risk Monitoring Committee;
- **Rubis Énergie's and the Rubis Terminal JV's Compliance Managers**, who roll out the programme within their divisions and address operational issues, if necessary, in conjunction with the Group CSR Director and Chief Compliance Officer;
- **the 36 Compliance Advisors**, who are appointed within operating entities, ensure that the Code of Ethics and anti-corruption policy are properly understood and applied at a local level. A Compliance Advisor has also been appointed within Rubis Photosol.

Tools have been provided to coordinate this network and to support Compliance Advisors in their work, including practical fact sheets on how to deal with gifts and invitations and manage conflicts of interest and Integrity Line training materials for employees. In addition, a biannual newsletter called Think Compliance has been sent to the operating entities since 2018 in order to strengthen the compliance culture within the Group.

The Group is committed to a continuous improvement approach and supplements its anti-corruption programme in view of changes in legislation and best practices.

FIGHTING FRAUD

The main internal fraud risk lies in the theft or misappropriation of products. Therefore, over several years the Group has established strict measures to verify production volumes (such as the automation of transfer stations to reduce human involvement as much as possible, inventory gap checks, and upgrades of control systems).

Finally, the increase in external fraud attempts (CEO impersonation and hacking, for instance) has prompted the Group to strengthen its information campaign with the aim of raising the awareness of all employees who are likely to

be approached (accounting, financial or legal positions) so that this type of fraud can be combatted more effectively.

In terms of IT security, the Group and its subsidiaries are constantly working on innovative cybersecurity solutions, using European tools, following the directives of the ANSSI (French national information systems security agency) but also of these various partners. These actions cover the protection of information systems. The Group trains its employees on detecting fraudulent emails (phishing, for example) and on suspicious activity at workstations. Strong and secure authentication solutions for production resources with constant flow analysis systems are also implemented.

FIGHTING TAX EVASION / NFIS /

The amount of taxes recognised by the Rubis Group (excluding the Rubis Terminal JV) in respect of financial year 2022 amounted to €198 million.

Group companies ensure that tax returns and payments are submitted in accordance with local regulations. They complete the tax returns required in the tax jurisdictions in which the Group operates its businesses. Rubis has opted for tax consolidation in France since 1st January 2001 (see note 5.2 to the separate financial statements). In accordance with its legal obligations, Rubis carried out its country-by-country reporting by reporting the breakdown of its profits, taxes and activities by tax jurisdiction and established the transfer pricing documentation applicable among Group companies (Transfer Pricing Documentation – Master File).

The Group does not have any subsidiaries that are not underpinned by economic activities (essentially, local commercial operations). In particular, the Group's presence, via Rubis Énergie, in the Caribbean Islands and the Channel Islands, corresponds to the distribution of petroleum products; Rubis supplies these islands with the energy resources necessary for their operation and manages, for example, the leading automotive fuel distribution network in the Caribbean and Bermuda, and distributes 100,000 m³ of petroleum products per year in the Channel Islands.

RESPECT FOR HUMAN RIGHTS / NFIS /

Respecting human rights is above all about promoting a model of a responsible employer that protects the fundamental rights of all Group employees in all countries where the Group has a presence. In addition to its legal obligations, Rubis advocates for the respect of individuals as a management principle and prohibits harassment and discrimination. These values are enshrined in the Code of Ethics put in place in 2015, which is distributed to employees.

In practical terms, the Group ensures that in all countries where it operates its human resources policy complies with the principles relating to human rights at work as set out in

the International Labour Organization's fundamental conventions in the areas of:

- freedom of association and collective bargaining;
- eliminating discrimination in hiring and professional discrimination;
- eliminating forced or compulsory labour;
- abolishing child labour.

In 2021, the Group joined the United Nation's Global Compact in order to reaffirm its commitment to integrating and promoting the principles of protecting human rights, complying with international labour and environmental protection standards and combatting corruption.

In 2020, the Group CSR & Compliance Department, in conjunction with Rubis Énergie's operational management, conducted an analysis of modern slavery risks in its value chain in order to ensure that adequate preventive measures are in place. This analysis was supplemented in 2022 by a broader mapping of the human rights challenges in the Group's activities.

Due to the Group's presence in countries where protection against discrimination based on sexual orientation or religion is not guaranteed by regulations, the Group pays particular attention to these matters. In particular, it will reiterate its principles of non-discrimination against anyone and for any reason whatsoever in its new Code of Ethics, which will be published in 2023.

Challenges related to the health, safety and security of workers and communities are also a subject of particular attention due to the Group's activities. Significant risk prevention measures have been implemented (see in particular section 4.2 of this document), both in terms of workplace safety and the prevention of industrial and road accidents.

Preventing the risk of forced labour in the shipping business is also a major focus. A crew management manual drawn up by the Rubis subsidiary in charge of managing wholly owned vessels sets detailed standards to be complied with in terms of crew recruitment and working conditions (under a temporary international contract with a Group entity), in line with the principles of the ILO Maritime Labour Convention, which include the rejection of forced labour. Enhanced vigilance is exercised when dealing with crew recruitment agencies. Contracts with these agencies include specific clauses relating to the obligation to comply with international standards, and the ILO Maritime Labour Convention in particular. Annual audits are carried out on these recruitment agencies. For chartered vessels, the services of a leading vetting company are used. Compliance with the Maritime Labour Convention is included in the pre-approval criteria for each vessel.

As regards the working conditions of service station managers, who are not Group employees, an initial assessment has been carried out on two subsidiaries with service station networks in two countries that are particularly exposed, Madagascar and Haiti. No cases of forced or child labour were identified by the commercial inspectors, who regularly inspect service stations, sometimes unannounced. An ethics clause, in which the service station operator undertakes to comply with Rubis' ethics rules, including compliance with applicable labour laws, the prohibition of forced or child labour, and compliance with employee health and safety rules, is included in certain contracts and must be systematically included when renewing or signing new contracts.

The Group's whistleblowing line, Rubis Integrity Line, which has been rolled out across all Group entities, is available not only to Rubis employees but also to external and occasional workers and enables them to report non-compliance with rules in a strictly confidential way (see the "Fighting corruption" section on the previous page). The deployment of the line to reach external employees, including the employees of service station managers, must be strengthened.

In addition, the Group ensures that systems for protecting the health and safety of all persons working within in subsidiaries are in place (see section 4.2.3.2.1).

4.5.1.2 Requirements for subcontractors and suppliers / NFIS /



The main suppliers of Rubis' subsidiaries are equipment suppliers and service providers, mainly in logistics (transport, operations).

RESPONSIBLE PURCHASING POLICY

The Code of Ethics stipulates that employees have an oversight mission and are to ensure within that context that third parties properly apply the Group's standards when working on Group sites. If the situation so requires, employees must conduct awareness or training actions and, if ethics rules are violated, advise their line managers.

The Code of Ethics also specifies that the Group's subsidiaries must require that the external service providers with which they work (suppliers, subcontractors, industrial or commercial partners) comply with internal standards related to safety, environmental protection and respect for individuals in particular.

Any finding of a breach of the Group's ethical standards must be communicated to the line Manager and/or the Management of the subsidiary or facility as quickly as possible.

Rubis' CSR Roadmap, Think Tomorrow 2022-2025, (accessible on the Group's website: https://www.rubis.fr/uploads/attachments/Rubis_CSR%20roadmap_2022_2025-EN.pdf), published in 2021, notably provides for a target of adopting a sustainable purchasing charter from 2023, which would make it mandatory to include CSR criteria when selecting suppliers and service providers for capital expenditures and the Company's most significant projects.

Lastly, the Group has implemented a management policy for detecting potential or proven conflicts of interest to avoid this type of situation, particularly in the context of relationships with service providers and suppliers. These rules are described in the Code of Ethics and the anti-corruption guide and set out in more detail in the dedicated practical sheets.

MEASURES FOR ENGAGEMENT AND CONTROL

The provision of services and supplies used on the Rubis Terminal JV's industrial sites is governed by the Group's social and environmental policy (see section 4.2.1).

Rubis' subsidiaries factor health, safety and environmental issues into the process of selecting solutions from their suppliers when such companies work at their facilities. The subsidiaries therefore favour practices that reduce energy consumption and waste generation, all while guaranteeing optimal security. This is the case in the choice of heating by heat pump that was made for newly constructed buildings for the Rubis Terminal JV.

The Rubis Terminal JV has set itself the target of having all orders fulfilled under terms containing a CSR criterion: all of the joint venture's service providers whose personnel carry out work on its industrial sites are selected using HSE criteria as a minimum. In addition, the Rubis Terminal JV responded to the Ecovadis questionnaire in 2021 and obtained the Bronze medal. Rubis Énergie, which does not have a centralised Purchasing Department, is considering setting up a target as part of the definition of the Group's CSR Roadmap. Rubis Énergie also responded to the Ecovadis questionnaire in 2021 and obtained a score of 45/100. The Vitogaz France subsidiary obtained the Gold medal.

Contracts also stipulate that suppliers must comply with applicable labour laws, including the fight against illegal employment and respect of working hours. CSR clauses are also attached to contracts with suppliers and stipulate that they must comply with the Rubis Group's Code of Ethics, as well as the anti-corruption guide.

Third-party assessment guidelines also provide for ethics risk assessments of their main trading partners, including suppliers and service providers.

The Group ensures that its suppliers, which generally operate nationwide or internationally, are certified whenever

possible and that they comply with the stringent regulations liable to be imposed on them (transport of hazardous materials, manufacturing of pressurised equipment, etc.).

A responsible purchasing approach will be launched in 2023 to identify the most at-risk purchasing categories and define an action plan for the priority categories.

4.5.2 Commitment to regional development / NFIS /

Committed to local populations, Rubis' subsidiaries attach great importance to dialogue with stakeholders and to promoting the dynamism of the regions in which they operate, not only in terms of economics and employment but also in the areas of culture and community living. The Group also commits itself through an active and targeted social engagement policy.

4.5.2.1 Close relationships with stakeholders



The Group's stakeholders consist of employees and their representatives (union representatives, Health, Safety and Working Conditions Committee (CHSCT), etc.), shareholders, national and local governmental bodies (DREALs, DRIEE, etc.), regulatory agencies, trade unions, associations and other private agencies working on social and environmental issues, customers and suppliers, as well as communities living near subsidiaries' facilities.

The Group has also consistently taken into account the impacts its facilities and activities have on residents' lives. Indeed, this is an obligation for Seveso sites, resulting in the signature of technological risk prevention plans (PPRT) that are negotiated with local authorities and the relevant associations (see section 4.2.3, which details the industrial safety measures implemented).

Measures have been taken in favour of residents living near industrial sites. These measures notably aim to avoid or diminish the nuisances associated with truck traffic, through the purchase or leasing of land to create parking areas for tank trucks waiting to be filled and, at certain sites, the creation of a booking system for truck loading.

When the activity conducted locally requires it, site Managers also have regular contact with all government stakeholders at the local, regional and national levels with

respect to the enforcement of regulations and for operating permits:

- in France (Rubis Énergie and the Rubis Terminal JV): DREAL (Regional Directorates of Environment, Planning and Housing), DRIEE Île-de-France (Regional and Interdepartmental Directorate of Environment and Energy), CLIC (Local Information and Consultation Committees), CSS (Site Monitoring Committee), local government, prefectures, SDIS (Fire and Rescue Departments), customs;
- in the Netherlands and Belgium (Rubis Terminal JV): agencies responsible for buildings or for the verification of regulatory compliance, including facility safety and security, compliance with environmental standards and compliance with customs regulations.

The relevant subsidiaries also play an active role in regional campaigns regarding major industrial hazards to inform local populations about operations carried out on its sites, the products stored there and safety instructions. Some site Managers have visited schools to raise public awareness about such risks. Others have organised tours of the industrial facilities for young people, reporters and elected officials.

What is a PPRT?

Introduced by the law of 30 July 2003 on the prevention of technological and natural risks and on compensation for damage and the implementing decree of 7 September 2005, the purpose of technological risk prevention plans (PPRT) is to regulate more closely future urban development around high-threshold Seveso sites.

The PPRT is a document drawn up by the French government. It maps exposure to risk around any given facility, taking into account the nature and intensity of the technological risks and the preventive measures implemented.

Rubis does not have any extractive activities, however, it is careful to respect the various cultures and traditions of the indigenous peoples in the regions where it operates.

For example, a consultation with indigenous populations was carried out for the CEOG project in French Guiana, in which Rubis is not a majority shareholder.

4.5.2.2 Economic and social involvement in regional communities



Rubis' subsidiaries are involved in the economic and social life of the communities within which they operate.

Their involvement is notably reflected in their contribution to the dynamism of the local employment market: more than 98% of the Group's employees are hired locally. Moreover, the sites most often favour business relationships with local suppliers (over 50%).

Within the Support & Services activity (Rubis Énergie), the SARA refinery also significantly contributes to the dynamism of the local job market: the number of direct and indirect jobs is estimated at 700 across the three French overseas departments (Martinique, Guadeloupe and French Guiana).

In the Retail & Marketing activity (Rubis Énergie), the network of small and medium-sized facilities (service stations, small depots) has an appreciable impact on employment, as the Group operates 1,054 service stations, mostly under independent management. The number of jobs (managers, fuel attendants, security guards) generated by these stations' activities has been estimated at more than 4,000 (i.e., a low average of around four full-time jobs per station). This estimate was made on the basis of ongoing reporting to better identify our contribution to the creation of indirect jobs. It will be gradually refined.

This is also the case in the Storage activity (Rubis Terminal JV), where terminals work primarily with regional service providers who are perfectly familiar with the various facilities and their developments. This means that the promotion of local employment is combined with optimised maintenance and routine upkeep of sites by contractors.

In addition to the direct impacts caused by hiring, the Group's facilities are a key driver of the local economy,

insofar as the Storage, Retail & Marketing, and Support & Services activities satisfy strategic requirements such as the storage of products used in industrial processes, the supply and transport of bitumen to improve the road network, the provision of fuel, etc.

The Rubis Terminal JV's depots are part of the logistics chain for chemical products, petrochemicals, agrifoods and liquid fertilisers, supplying industries located nearby. Their presence and adaptability are essential for the development of regional industries. For example, the Rubis Terminal JV's French subsidiary serves the entire Lyon and Grenoble chemical valley.

Finally, this role in regional development is also reflected in the subsidiaries' involvement in community life in the areas where the Group operates. Subsidiary and site Managers maintain close ties with local communities, and the law on technological risk prevention plans (PPRT) has further promoted dialogue and closer relationships.

For example, the Rubis Terminal JV's teams are in close contact with the ports with which concessions have been signed (Rotterdam, Antwerp, Rouen, Strasbourg, Dunkirk and Brest). Site managers are encouraged to take on responsibilities within these port organisations. In general, terminals located in industrial areas are actively involved in the projects of local associations, with a view to maintaining economic activity in the area.

More broadly, the subsidiaries' involvement in regional communities also results in active participation in efforts supporting, promoting or preserving cultural heritage and the volunteer sector. Commitments of this type are in addition to the Group's social engagement activities.

4.5.2.3 The Group's social engagement

For over 10 years, the Group has pursued a policy of international social engagement through the implementation of targeted initiatives within local communities in the countries in which the Group operates.

The community investment carried out by the Group and its subsidiaries are driven by two commitments:



Education

Provide better access to education
and encourage training and entrepreneurship



Health

Provide better access to health,
hygiene and care

The Rubis Mécénat endowment fund, founded in 2011, is developing around two axes:



Contemporary creation

Support emerging contemporary creation
in France



Humanitarian and artistic projects

Develop educational and social projects
for the professional integration of young people
through artistic practice

In 2022, Rubis devoted nearly €2 million to its social engagement actions in around 20 of the Group's countries.

THE GROUP'S COMMUNITY INVESTMENT: A LOCAL COMMITMENT TO PROMOTE ACCESS TO EDUCATION AND HEALTH

In response to the Group's desire to be fully integrated in the regions where it operates and to contribute to their development, Rubis supports, with its subsidiaries, associations or associative projects working with the most vulnerable populations for better access to education and health. Each associative project is supported by the local subsidiary and is adapted to the issue on the ground in order to best meet the expectations of populations.

In order to continue and strengthen its proactive approach, the Group has included the following commitment in its CSR Roadmap, Think Tomorrow 2022-2025: by 2025, 100% of the business units will have implemented community investment meeting a local need in connection with one of the two axes: education and health.

Rubis also supports emergency actions to help populations affected by natural disasters and/or humanitarian crises.

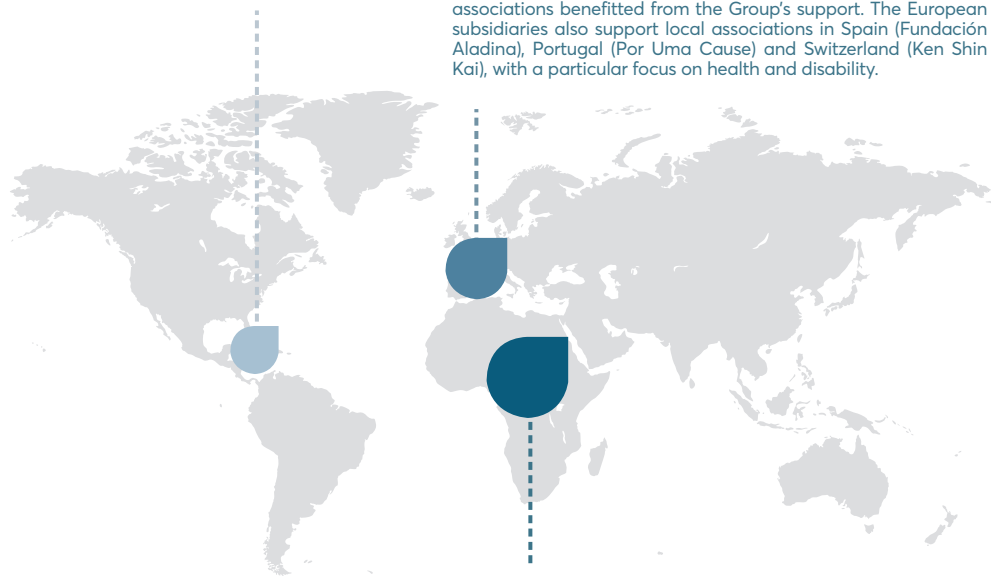
Independently of Rubis' community investment, each subsidiary is involved in local associative projects of its choice, either on an *ad hoc* or long-term basis.

Community investment in the Caribbean

Education is a priority for our subsidiaries in the Caribbean: SARA created the ENAG association (Énergie Nouvelle Antilles-Guyane), which invests in projects run by or for young people in Guadeloupe, French Guiana and Martinique.

Community investment in Europe

In France, Rubis SCA is committed over the long term to associations such as L'École à l'Hôpital (School at the hospital). The Rubis Énergie, Vitogaz France and Rubis Terminal JV subsidiaries participate in these actions with a call for associative projects aimed at their employees. In 2022, the K-Dog, Buncoeur-Damoclès and Caneton Club de Beaumont associations benefitted from the Group's support. The European subsidiaries also support local associations in Spain (Fundación Aladina), Portugal (Por Uma Cause) and Switzerland (Ken Shin Kai), with a particular focus on health and disability.



Community investment in Africa

In Africa, Rubis and its subsidiaries are particularly involved with local associations that seek to encourage education and training for local communities, thereby responding to a need for the reintegration and professionalisation of African youth. Thus, Galana, Vitogaz Madagascar and Easigas Botswana support schools providing education for children from local communities. Eres Togo supports young African entrepreneurs in the energy field and Rubis Energy Kenya runs a scholarship programme for a selection of promising students. In Rwanda and Senegal, the subsidiaries are committed to the social inclusion of vulnerable populations.

Key figures in 2022



- 33 associations and projects supported in the context of the Group's community investment.
- Including two exceptional donations to the Fondation de France's Ukraine Solidarity Fund and the NGO Gift of the Givers following the floods in the Durban region in South Africa.
- 67% of business units committed to the Group's community investment in Europe, Africa and the Caribbean.
- 3 new countries committed in 2022: Rwanda, Zambia and India.
- Nearly 700 employees involved with associations supported by subsidiaries: sponsorship activities, fundraising, meetings, etc.
- Nearly 50,000 beneficiaries⁽¹⁾ of Rubis' community investment and the commitments of each subsidiary in Europe, Africa and the Caribbean.

(1) Excluding beneficiaries of the exceptional donation to the Fondation de France's Ukraine Solidarity Fund.

Change in the calculation method in 2022 vs 2021: the number of beneficiaries is calculated pro rata to the amounts paid to each association.

RUBIS MÉCÉNAT: RUBIS GROUP ENDOWMENT FUND FOR COMMITTED ARTISTIC AND SOCIAL PROJECTS

Rubis Mécénat is an endowment fund created by the Rubis Group in 2011. Its purpose is, on the one hand, to support emerging contemporary creation in France through aid for artistic productions and, on the other hand, to develop long-term humanitarian, educational and social projects aimed at the professional integration of young people from underprivileged backgrounds through artistic practice in certain countries where the Group operates.

 We affirm our desire to continue to carry out impactful artistic projects that have a social and societal dimension and convey a positive and constructive message.

Lorraine Gobin,
Managing Director
of Rubis Mécénat

Key figures since 2011

- About **30 aids for artistic production** to support emerging artists in France in the creation of new work in collaboration with cultural institutions.
- **3 humanitarian, educational and social programmes** with a long-term vocation developed by Rubis Mécénat for the professional integration of young people from disadvantaged backgrounds through artistic practice.
- More than **150 young adults** (15-30 years old) supported in the framework of these humanitarian and educational programmes.
- Nearly **100 scholarships** granted to these young beneficiaries to access higher studies and support them in their professional careers.

2022 in figures

- Around **50 young adults** (15-30 years old) benefited from training and weekly workshops as part of Rubis Mécénat's three humanitarian programmes in South Africa, Jamaica and Madagascar.
- Around **10 young beneficiaries of these educational programmes received scholarships** to access higher-level training in the arts in Jamaica and South Africa.
- **5 young beneficiaries** of the Ndao Hanavao programme in Madagascar were supported in the creation of an eco-responsible company.
- **4 artists received the support of Rubis Mécénat** with exhibitions in France in the autumn of 2022: Benjamin Loyauté (Saint-Eustache church, Paris), Hélène Janicot (Saint-Eustache church, Paris), Jabulani Dhlamini and Thembinkosi Hlatshwayo (PhotoSaintGermain festival, Paris).
- **2 books were published**: a book of photographs for the 10th anniversary of the Of Soul and Joy project in South Africa and an artist book on the performance of the French artist Benjamin Loyauté presented at the Saint-Eustache church in the autumn of 2022.
- **1 episode of the series Art(ist)** was released on the French designer Laureline Galliot.
- **1 documentary film** was produced celebrating the 10th anniversary of the Of Soul and Joy project in South Africa.

4.6 Methodology note / NFIS /

This section contains a description of methodology and a cross-reference table designed to facilitate understanding of CSR information. Accordingly, it was decided to present the scope and methods for reporting CSR information and the key definitions contained in the internal standards on reporting labour and environmental information. These clarifications will enable the reader to have a more precise understanding of each information item's scope and relevance.

4.6.1 CSR scope

The rules relating to an entity's date of inclusion within and exit from the CSR scope are defined as follows:

- any acquisition of an entity (external to the Group) is included in the CSR reporting scope starting the first full financial year occurring after the entity is included in the financial scope, at the earliest. This rule allows HR processes, safety standards, Group commitments and the corresponding monitoring indicators to be better integrated. Thus, for the financial year 2022, Rubis Photosol is not included in the NFIS except for data relating to the workforce and some qualitative information on the Group's climate strategy;
- unless otherwise indicated, the CSR data of an entity that was sold or liquidated during the financial year is excluded from CSR reporting for the entire financial year in which it was sold or liquidated.

In January 2022, the activities of the Rubis Terminal JV in Turkey were sold. The quantities presented for year Y and the comments on changes include this change in scope. In the tables, the reference quantities for Y-1 remain identical to those reported in 2021 without change of scope.

4.6.1.1 Environmental data

Unless expressly stated otherwise, the reporting scope for environmental information corresponds to the Group's financial scope of consolidation. Controlled companies are fully consolidated, with the exception of data relating to greenhouse gas emissions (see below).

Environmental data for the Rubis Terminal JV, which is jointly controlled by Rubis SCA and its partner and accounted for using the equity method, are presented both at 100% and in accordance with the percentage of capital held by Rubis SCA (55%).

The exact scope of reporting of environmental data may vary according to the environmental indicators, depending on their relevance and the accounting methods applied. The environmental data is collected at the legal entity level.

Environmental data is published by activity. Figures are published for the activities that have the most significant environmental impacts (Support & Services activities at Rubis Énergie and the activities of the Rubis Terminal JV).

The greenhouse gas emissions from the Group's activities and the greenhouse gas emissions related to the use by customers of products sold for final use have been evaluated and are published for all the entities in the financial scope of consolidation, with the exception of Rubis SCA/Rubis Patrimoine due to their immaterial impact (25 employees, no operating activity). In accordance with the principles of the GHG Protocol, this data is proportionally consolidated by applying the percentage of the stake held.

4.6.1.2 Social data

Unless expressly stated otherwise, the reporting scope for social information corresponds to the Group's financial scope of consolidation. Controlled companies are fully consolidated.

Social data regarding the Rubis Terminal JV, which is jointly controlled by Rubis SCA and its partner and accounted for using the equity method, are presented at the rate of 100%.

The information for Rubis SCA/Rubis Patrimoine, Rubis Énergie (Retail & Marketing and Support & Services activities), Rubis Photosol and the Rubis Terminal JV is presented separately and/or by region.

The exact scope of social data reporting may vary according to the social indicators, depending on their relevance and the accounting methods applied. Social data is collected at the legal entity level. The breakdown of the workforce by age, job category and work time covers 99.98% of the workforce; four entities, due to a small workforce (three or less employees) representing a total of eight employees, are not included.

In addition, the shipping activity requires the use of crews hired on temporary contracts (with a Group entity or on an interim basis). These non-permanent employees of the Group (224 individuals in 2022) are not taken into account when monitoring published social indicators.

4.6.1.3 Societal/ethics data

The reporting scope for societal and ethics information corresponds to the Group's financial scope of consolidation. The applicable reporting method is proportional consolidation (percentage of stake held). The societal/ethics data are collected at the business unit level.

4.6.2 Data reporting methods

The production of CSR information is carried out jointly by the subsidiaries and the Group's parent company. It is subject to systematic internal audits.

For several years now, the Group has used a risk mapping process to identify significant risks. This identification process and risk management and monitoring arrangements

are described in chapters 3 and 4 of this Universal Registration Document.

4.6.2.1 Comparability and reliability of information

Reporting protocols have been designed to ensure the comparability of results between Group entities.

However, environmental performance is only comparable at the level of a given activity.

As the strength of the Group's business has resulted in significant external growth, the CSR reporting scope also changes on a regular basis, and therefore does not, in the

absence of ratios, allow for true comparability of data across several financial years.

A set of reporting standards for environmental and labour-related information was defined by management in partnership with the relevant subsidiaries. These standards provide a precise definition for each data item referred to in the information reporting protocols with the aim of reducing the risk that concepts will be interpreted differently.

4.6.2.2 Control measures

The data collected is checked for consistency at the local level, then by the functional departments of Rubis Énergie or the Rubis Terminal JV and by the Group CSR &

Compliance Department. Consistency between the financial scope and that of the social data is ensured by the Group CSR & Compliance Department.

4.6.2.3 Changes in methodology

Unless otherwise provided, the methodology cannot be changed after the information reporting process within Group entities has begun. Changes in methodology are prepared and/or overseen by the Group CSR & Compliance Department after consultation with Rubis Énergie and the

Rubis Terminal JV. They take into account, where applicable, comments and observations made by stakeholders on the relevance and quality of the definitions used in the reference system.

4.6.2.4 Methodological limitations

It is important to note that the indicators may have methodological limitations due to:

- a lack of harmony in national laws, and in particular the specificities of labour laws in certain countries;
- the heterogeneity of the data managed within the Group's subsidiaries;
- changes in definition that may affect their comparability;

- practical arrangements for collecting data;
- the availability of source data as of the reporting date.

Some indicators should be interpreted with caution, particularly averages, since they consist of worldwide data that requires a more detailed analysis at the level of the relevant geographical areas, countries and business lines.

4.6.2.5 Data reporting tools

Data are reported by the operating entities within the scope of consolidation *via* the reporting software implemented by the Group in 2020, unless otherwise specified below.

ENVIRONMENTAL DATA

Because the Group's various activities have environmental impacts that are specific to such activities (see section 4.2.2), data calculation methods may vary depending on the activity. However, the definitions are standardised at the level of each division, within a "standard for reporting environmental data" that has been incorporated into the Group's CSR data reporting software.

Rubis Énergie's data is reported by the entities in the reporting software, with the exception of (i) data from SARA (refinery), which is the subject of a specific report issued by SARA's HSE teams, and (ii) data relating to the number of Seveso sites, which are submitted by headquarters on a consolidated basis.

Data from entities within the scope of the Rubis Terminal JV are reported on a consolidated basis by the Rubis Terminal JV's Operations Department for inclusion in the Group's reporting software.

SOCIAL DATA

For all entities, the social data reporting protocols include similar information based on standardised definitions set out in the "standard for reporting social data" that has been incorporated into the Group's CSR data reporting software.

SOCIETAL/ETHICS DATA

Societal/ethics data are reported using the reporting software on the basis of standardised definitions that apply to all entities and that are partly produced by Rubis SCA (Group ethics policy). Regarding social engagement initiatives, as well as dialogue with stakeholders and commitment to local areas, the information collected may come from public communications by subsidiaries and/or a societal information reporting protocol for the Rubis Terminal JV.

4.6.3 Definitions

Concepts (in alphabetical order)	Definitions
1) Environmental information	
Energy consumption	There is no mandatory legal definition for this issue. Rubis Énergie The Retail & Marketing activities are for the most part not energy intense. They are not therefore such as to justify that an overall measuring system be set up at the division level. In the refining activity, the refinery uses part of the crude oil it stores to produce energy (electricity and steam). An internal database monitors the site's real-time power generation and consumption.
	Rubis Terminal JV The data represent the sum of the quantities of automotive or heating fuels or electricity purchased, converted into GJ, with the exception of fuel used by administrative staff (headquarters and site management) for transport.
Greenhouse gases (emissions)	Only carbon dioxide (CO ₂) is assessed, as according to our estimates, Group activities do not involve other greenhouse gases, including methane (Annex II of Directive 2003/87/EC). The CO ₂ emissions led to a carbon footprint assessment audit being conducted, the scope of which is detailed in the definitions of "Scope 1", "Scope 2" and "Scope 3".
Hazardous waste	Rubis Énergie Most Retail & Marketing activities do not produce hazardous waste. The activities are not of a nature that justifies that an overall measuring system be set up at the division level. In the refining activity, waste amounts to the values reported during the financial year (time lag of one year).
	Rubis Terminal JV Waste amounts to the values reported during the financial year (one-year lag) for all sites.
Industrial sites	Rubis Énergie The following are considered to be industrial sites: the refinery; any storage sites (depots) for liquefied gas, petroleum products, or bitumen with a storage capacity > 50 tonnes of liquefied gas and/or 500 m ³ of petroleum products/bitumen; any liquefied gas cylinder filling plant with a storage capacity > 50 tonnes.
	Rubis Terminal JV Storage sites for fuels and combustibles, chemical products, bitumen, food products and liquid fertilisers.
Nitrogen oxides (NO_x)	Rubis Énergie In the refining activity, NO _x emissions are assessed by the refinery's Production Technical Office using a spreadsheet. This is an estimate based on the emission factor of each fuel and the operating time of DeNO _x from combustion turbines. This calculation is audited annually by a qualified independent body.
	Rubis Terminal JV NO _x is calculated based on consumption of combustibles or fuels (excluding electricity) over the financial year. The fuel used by administrative staff (headquarters and site management) when travelling is not taken into account. Concentrations of NO _x in fumes are considered in the calculation as being equal to the highest permitted level of emissions or, in the absence of a limit, 150, 200, 300 or 550 mg/Nm ³ for boilers, depending on the fuel used, or 2 g/kWh for engines, in the absence of representative measurements.
Scope 1	Direct emissions from fixed and mobile facilities within the organisational scope, i.e., emissions from sources held or controlled by the organisation, such as combustion generated by owned industrial facilities or trucks, industrial processes, etc.
Scope 2	Indirect emissions linked to the generation of electricity, heat or steam purchased for the organisation's activities. These emissions are calculated using the location-based methodology, i.e., by taking the country's emissions factor into account.
Scope 3	Other emissions indirectly caused by the organisation's activities that are not accounted for under scope 2 but are linked to the entire value chain, for example, the purchase of raw materials, services or other products, employee travel, upstream and downstream transport of merchandise, management of waste generated by the organisation's activities, use and end of life of products and services sold, capitalisation of goods and production equipment, etc. The following items are included in scope 3 of Rubis' carbon footprint assessment: purchases of goods and services, fixed assets, upstream energy, upstream and downstream transport of merchandise, waste generated, use of products sold. For purchases of goods and services for capital expenditures, the Rubis Terminal JV has counted the annual depreciation of this value in 2020 and not the values purchased. Certain items were excluded from Rubis' carbon footprint assessment, as these emissions represent less than 5% of scope 3 GHG emissions and are therefore not material to the Group. The emissions principally relate to depreciation of trucks and buildings.
Scope 3A	All indirect emissions induced upstream as a result of the Company's activities for its production and marketing of products (e.g., employee travel, logistics, end-of-life of products, etc.), excluding products sold (see definition of scope 3B).
Scope 3B	Indirect emissions induced downstream by the products and/or services sold by the Company when they are used by customers (category 11).
Sulphur dioxide (SO₂)	SO ₂ emissions are assessed in the refining activity. These emissions are evaluated by the refinery's Production Technical Office using a spreadsheet. The flow of SO ₂ is calculated based on the fuel supply (based on the reconciled materials balance) and the sulphur content of the fuels analysed by the refinery's laboratory. SO ₂ concentration is deduced on the basis of the gas volume calculated using the net calorific value (NCV) of each fuel. This calculation method is audited annually by a qualified independent body.

Concepts (in alphabetical order)	Definitions
Suspended solids	<p>These are particles that are suspended in water, the nature of which depends on the activities carried out on the polluted site.</p> <p>Rubis Énergie Regular Retail & Marketing activities generate little water pollution. In the refining activity, suspended solids are analysed and evaluated by the refinery's laboratory and then audited by a qualified independent body.</p> <p>Rubis Terminal JV Given the very broad scope of particles that may fall within the definition of suspended solids, the Rubis Terminal JV retains only the compounds that are the most representative of the pollution that may be produced by its main activities. Values from the French sites are the only values reported to authorities; in other places, the values are those established for Group reporting.</p>
Volatile organic compounds (VOC)	<p>Rubis Énergie Consolidated VOC emissions correspond to the values reported during the financial year (with a one-year lag) with respect to all French sites that are subject to reporting obligations under applicable regulations. In the refining activity, measurements of VOC emissions are the subject of a biennial sniffing campaign conducted by an accredited independent body.</p> <p>Rubis Terminal JV Consolidated VOC emissions correspond to the values reported during the financial year (one-year lag) for all sites.</p>
Water used	<p>This is standing water (e.g., reservoirs and lakes) or running water (e.g., rivers) located above ground, sea water, rainwater, underground water and water from the distribution network that was used in the activities of the Group entity. Discharged water is abstracted water, plus some rainwater.</p> <p>Rubis Énergie Most of the Retail & Marketing operations do not require recurrent use of large quantities of water as part of an industrial process.</p> <p>In the refining activity, water consumption is measured based on meter readings. The volume of water discharged corresponds to the value recorded by the meter at wastewater treatment exits.</p> <p>Rubis Terminal JV The quantities of water withdrawn or discharged are the values declared during the financial year (one-year lag) for all sites.</p>

2) Social information

Absenteeism rate	Percentage of days of absence (absences due to non-occupational illness or occupational illness or occupational accidents or unjustified absences) in relation to the total number of days worked per year.
Apprenticeship contract or occupational training contract	A contract between a person pursuing an academic training course (at university or in a training centre) and a Group entity (in principle, for a fixed term of six months or more (except where an exception is provided for in the applicable legislation)) that entitles such person to call themselves an employee of the signatory company.
Crews	Persons employed under temporary contracts to work onboard vessels owned by the Group. The social indicators relating to permanent employees do not include these non-permanent workers, for which separate monitoring is more relevant.
Departure by mutual agreement	The departure of an employee of a Group entity (including those on trial periods) that results from an amicable agreement between the two parties and that was not imposed by one of the parties on the other. Accordingly, departures by mutual agreement are not considered as dismissals or resignations under the applicable legislation.
Employees	<p>This category includes:</p> <ul style="list-style-type: none"> • full-time or part-time contracts, whether or not the work is performed in shifts; • apprenticeship contracts and occupational training contracts (in countries where this legislation applies). <p>This category does not include:</p> <ul style="list-style-type: none"> • internship contracts; • external service providers working for Group entities that have not signed an employment contract with the entity in question; • temporary staff who are the employees of an external service provider (temporary staffing company) notwithstanding the fact that they work on a Group entity's site. <p>Expatriate employees, seconded employees and employees who are part of an intra-group mobility programme should be accounted for in the entity for which they effectively and usually work.</p>
Executives	<p>To enable global harmonisation of reporting, employees were distinguished as follows:</p> <p>Non-executives: non-executive and non-senior executive employees.</p> <p>Executives: employees:</p> <ul style="list-style-type: none"> • with managerial duties and responsibilities, without being part of the General Management or a member of the Management Committee, or being a site Manager; or • with the status of <i>cadre</i> under French law. <p>Senior executives: senior executives are executives belonging to the General Management or members of the Rubis Énergie or Rubis Terminal JV Management Committee, Directors of subsidiaries and site Managers and the executives that report directly to them.</p>
Management Committee	A Management Committee is a Committee composed of the main Directors or Managers of a Group entity who meet regularly to make strategic decisions and monitor the entity's results.
Number of days worked per year	The total number of days worked per year, which is used as the basis for calculating absenteeism rates, results from the conversion of an average number of hours worked each day that may vary slightly from one subsidiary to another, taking into account applicable laws and the nature of the activities carried out locally.
Number of hours worked per year	The number of hours worked per year may be calculated based on a daily average established under prevailing law.
Occupational accidents	An accident affecting an employee of a Group entity, where a medical certificate or investigative findings establish that the accident was directly caused by the employee's work at the entity at issue and which leads to medical leave (total or partial).
Unilateral decision	A decision taken unilaterally by the Management of the Group entity in question after discussion with the employee representatives (as applicable).

4.6.4 Cross-reference table

The information contained in this chapter was compiled in order to respond to the provisions of European Directive 2014/95/EU on the disclosure of social and environmental information transposed in Articles L. 225-102-1, R. 225-105 and R. 225-105-1 of the French Commercial Code.

The indicators presented in this chapter have been addressed and included in view of their relevance to the Group's businesses.

Topics	Chapters or section	
Business model	1	
Overview of the main non-financial risks relating to the Company's activity	4.1.2.2	
Description of policies and results		
● environment (general policy, pollution, circular economy, safety)	4.2	
● social (employment, equal treatment, work organisation, training, health and safety, social dialogue)	4.4	
Respect for human rights	4.5.1.1	
Fighting corruption	4.5.1.1	
Fighting tax evasion	4.5.1.1	
Climate change, use of goods and services	4.3	
Societal commitments		
● sustainable development	4.5.2	
● circular economy	4.2.2.3	
● food waste	Not included	} Given the nature of its activities, Rubis does not believe that these topics constitute a material risk and that there is any need to expand on them in this document
● fighting food insecurity	Not included	
● respect for animal welfare	Not included	
● responsible, fair and sustainable food	Not included	
● actions aimed at promoting the practice of physical and athletic activities	Not included	
● collective agreements and impacts	4.4.3.2	
● fighting against discrimination and promoting diversity	4.4.1	
● measures to support disabled people	4.4.1.4	
Specific information (Article L. 225-102-2 of the French Commercial Code)		
● technological accident risk prevention policy implemented by the Company	3.1.2.1 and 4.2.3	
● ability of the Company to cover its civil liability in respect of property and persons due to the operation of such facilities	3.3.1.2	
● means provided by the Company to manage the compensation of victims in the event of a technological accident involving its liability	3.3.1.2	
Methodology note	4.6	
Report of the independent third party on the information presented in the NFIS	4.7	

4.7 Report of one of the Statutory Auditors, appointed as independent third party, on the verification of the consolidated non-financial statement

This is a free English translation of the report by one of the Statutory Auditors issued in French and is provided solely for the convenience of English-speaking readers. This report should be read in conjunction with, and construed in accordance with, French law and professional standards applicable in France.

In our capacity as Statutory Auditor of the company RUBIS (hereinafter the "Entity"), appointed as independent third party ("third party") and accredited by the French Accreditation Committee (Cofrac), (Cofrac Inspection Accreditation, n° 3-1862, scope available at www.cofrac.fr), we have undertaken a limited assurance engagement on the historical information (observed or extrapolated) in the consolidated non-financial statement, prepared in accordance with the Entity's procedures (hereinafter the "Guidelines"), for the year ended December 31, 2022 (hereinafter the "Information" and the "Statement", respectively), presented in the group management report pursuant to the legal and regulatory provisions of Articles L. 225-102-1, R. 225-105 and R. 225-105-1 of the French Commercial Code (*code de commerce*).

Conclusion

Based on the procedures we have performed as described under the "Nature and scope of procedures" and the evidence we have obtained, nothing has come to our attention that cause us to believe that the consolidated non-financial statement is not prepared in accordance with the applicable regulatory provisions and that the Information, taken as a whole, is not presented fairly in accordance with the Guidelines.

Comments

Without calling into question the conclusion expressed above and in accordance with the provisions of Article A. 225-3 of the Commercial Code, we make the following comments:

- hazardous waste, consolidated VOC emissions, quantities of water used and treated as well as discharges into water from the Rubis Terminal JV are published at intervals of one year: the published values correspond to the financial year 2021, on all French sites, Antwerp and Rotterdam;
- the information presented with respect to Responsible Purchasing risk is limited to challenges that do not allow a sufficiently precise assessment of the policies specific to the entity's context. On the other hand, the results presented for this risk do not identify any key performance indicator.

Preparation of the non-financial performance statement

The absence of a commonly used generally accepted reporting framework or a significant body of established practice on which to draw to evaluate and measure the Information allows for different, but acceptable, measurement techniques that can affect comparability between entities and over time.

Consequently, the Information needs to be read and understood together with the Guidelines, the significant elements of which are available on request from head office.

Inherent Limitations in preparing the Information

As stated in the Statement, the Information may be subject to uncertainty inherent to the state of scientific and economic knowledge and the quality of external data used. Some information is sensitive to the choice of methodology and the assumptions or estimates used for its preparation and presented in the Statement.

Responsibility of the Entity

Management is responsible for:

- selecting or establishing suitable criteria for preparing the Information;
- preparing a Statement pursuant to legal and regulatory provisions, including a presentation of the business model, a description of the main non-financial risks, a presentation of the policies implemented considering those risks and the outcomes of said policies, including key performance indicators and the information set-out in Article 8 of Regulation (EU) 2020/852 (Green taxonomy);

- preparing the Statement by applying the Entity's "Guidelines" as referred above; and
- implementing internal control over information relevant to the preparation of the Information that is free from material misstatement, whether due to fraud or error.

The Statement has been prepared by the Managing Directors.

Responsibility of the Statutory Auditor appointed as independent third party

Based on our work, our responsibility is to express a limited assurance conclusion on:

- the compliance of the Statement with the requirements of Article R. 225-105 of the French Commercial Code;
- the fairness of the information provided pursuant to part 3 of sections I and II of Article R. 225-105 of the French Commercial Code, *i.e.*, the outcomes of policies, including key performance indicators, and measures relating to the main risks, hereinafter the "Information."

As we are engaged to form an independent conclusion on the Information as prepared by management, we are not permitted to be involved in the preparation of the Information as doing so may compromise our independence.

It is not our responsibility to report on:

- the Entity's compliance with other applicable legal and regulatory provisions (particularly with regard to the information set-out in Article 8 of Regulation (EU) 2020/852 (Green taxonomy), the French duty of vigilance law and against corruption and tax evasion);
- the fairness of information set-out in Article 8 of Regulation (EU) 2020/852 (Green taxonomy);
- the compliance of products and services with the applicable regulations.

Applicable regulatory provisions and professional guidance

We performed the work described below in accordance with Articles A. 225-1 et seq. of the French Commercial Code, the professional guidance issued by the French Institute of Statutory Auditors (*Compagnie Nationale des Commissaires aux Comptes*) applicable to such engagement, in particular the professional guidance issued by the *Compagnie Nationale des Commissaires aux Comptes*, *Intervention du commissaire aux comptes – Intervention de l'OTI – déclaration de performance extra-financière*, and acting as the verification programme and with the international standard ISAE 3000 (revised) - *Assurance engagements other than audits or reviews of historical financial information*.

Independence and quality control

Our independence is defined by the provisions of Article L. 822-11 of the French Commercial Code and French Code of Ethics for Statutory Auditors (*Code de déontologie*) of our profession. In addition, we have implemented a system of quality control including documented policies and procedures aimed at ensuring compliance with applicable legal and regulatory requirements, ethical requirements and the professional guidance issued by the French Institute of Statutory Auditors (*Compagnie Nationale des Commissaires aux Comptes*) relating to this engagement.

Means and resources

Our work engaged the skills of 7 people between December 2022 and April 2023 and took a total of 8 weeks.

We were assisted in our work by our specialists in sustainable development and corporate social responsibility. We conducted ~10 interviews with people responsible for preparing the Statement, representing in particular CSR direction, risk management, compliance, human resources, health and safety, environmental.

Nature and scope of procedures

We are required to plan and perform our work to address the areas where we have identified that a material misstatement of the Information is likely to arise.

The procedures we performed were based on our professional judgment. In carrying out our limited assurance engagement on the Information, we:

- obtained an understanding of all the consolidated entities' activities and the description of the main risks associated;
- assessed the suitability of the criteria of the Guidelines with respect to their relevance, completeness, reliability, neutrality and understandability, taking into account, where appropriate, best practices within the sector;

Report of one of the Statutory Auditors, appointed as independent third party,
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- verified that the Statement includes each category of social and environmental information set out in article L. 225 102 1 III as well as information regarding compliance with human rights and anti corruption and tax avoidance legislation;
- verified that the Statement provides the information required under Article R.225-105 II of the French Commercial Code where relevant with respect to the main risks, and includes, where applicable, an explanation for the absence of the information required under Article L.225-102-1 III, paragraph 2 of the French Commercial Code;
- verified that the Statement presents the business model and a description of the main risks associated with of all the consolidated entities' activities, including where relevant and proportionate, the risks associated with its business relationships, its products or services, as well as its policies, measures and the outcomes thereof, including key performance indicators associated to the main risks;
- referred to documentary sources and conducted interviews to:
 - assess the process used to identify and confirm the main risks as well as the consistency of the outcomes, including the key performance indicators used, with respect to the main risks and the policies presented, and
 - corroborate the qualitative information (measures and outcomes) that we considered to be the most important presented in Appendix 1; concerning social and societal risks, our work was carried out on the consolidating entity, for other risks, our work was carried out on the consolidating entity and on a selection of sites: SARA, Vitogaz France, Vitogaz Switzerland, Rubis Portugal, Société Réunionnaise des produits pétroliers, Easigas South Africa and Rubis Terminal;
- verified that the Statement covers the consolidated scope, i.e. all the entities within the consolidation scope in accordance with Article L. 233-16 of the French Commercial Code within the limitations set out in the Statement;
- obtained an understanding of internal control and risk management procedures the Entity has implemented and assessed the data collection process aimed at ensuring the completeness and fairness of the Information;
- for the key performance indicators and other quantitative outcomes that we considered to be the most important presented in Appendix, implemented:
 - analytical procedures to verify the proper consolidation of the data collected and the consistency of any changes in those data,
 - tests of details, using sampling techniques, in order to verify the proper application of definitions and procedures and reconcile the data with supporting documents. This work was carried out on a selection of contributing sites : SARA, Vitogaz France, Vitogaz Switzerland, Rubis Portugal, Société Réunionnaise des produits pétroliers, Easigas South Africa and Rubis Terminal and covers between 23% and 100% of the consolidated data relating to the key performance indicators and outcomes selected for these tests;
- assessed the overall consistency of the Statement in relation to our knowledge of all the consolidated entities.

The procedures performed in a limited assurance review are less in extent than for a reasonable assurance opinion in accordance with the professional guidelines of the French National Institute of Statutory Auditors (*Compagnie Nationale des Commissaires aux Comptes*); a higher level of assurance would have required us to carry out more extensive procedures.

Neuilly-sur-Seine, 24 April 2023

One of the Statutory Auditors,

PricewaterhouseCoopers Audit

Cédric Le Gal

Partner

Sylvain Lambert

Partner within the Sustainability Department

Annex : List of outcomes that we considered to be the most important

Key performance indicators and other quantitative results:

Social :

- Total workforce at the end of the period, breakdown by gender;
- Number of departures and arrivals in the workforce, breakdown by gender;
- Number of training hours, including safety-related training;
- Rate of employees trained in the changes of the business lines (energy transition, CSR, etc.);
- Number of occupational accidents;
- Number of days lost due to occupational accidents.

Environnement :

- Energy consumption;
- CO₂ emissions (scopes 1, 2, and 3);
- SO₂ and NO_x emissions (SARA scope only);
- VOC emissions (SARA scope only);
- Number of accidental spills reaching the environment > 200 liters.

Anti-corruption :

- Number of employees who received the Gifts and invitations procedure;
- Number of employees who received the conflict of interest prevention procedure;
- Number of employees notified of ethics and anti-corruption rules during the year;
- Number of employees with access to the anti-corruption system;
- Number of employees trained in ethics and anti-corruption rules during the year.

Selected qualitative information (actions and results):

- Total Photosol workforce;
- Rubis ESG Corporate Rating ISS ESG;
- Ruby MSCI ESG Ratings;
- Rubis risk mapping;
- HSE Charter;
- Code of Ethics 2017;
- CSR roadmap 2022-2025;
- HSSEQ! SARA 2022 report;
- Rubis group human rights risk register (June 2022);
- Guide to applying the anti-corruption policy;
- Rubis Societal actions;
- Sponsorship agreement;
- Membership of the United Nations Global Compact.