

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Contents**

Accor SA . . . . .	1	Credit Mutuel Arkea SA . . . . .	33
Air France-KLM SA . . . . .	2	Cromology SAS . . . . .	34
Airbus Group SE . . . . .	3	Danone SA . . . . .	35
Alstom SA . . . . .	4	Dassault Aviation SA . . . . .	36
Alten SA . . . . .	5	Dassault Systemes SE . . . . .	37
Altice France SA . . . . .	6	Decathlon SA . . . . .	38
Altran Technologies SA . . . . .	7	Derichebourg Propreté SA . . . . .	39
ArcelorMittal Atlantique et Lorraine SAS . . . . .	8	EGIS SA . . . . .	40
Arkema SA . . . . .	9	Eiffage Infrastructures SAS . . . . .	41
Atos SE . . . . .	10	Electricite de France SA . . . . .	42
Auchan Holding SA . . . . .	11	Elior Group SA . . . . .	43
Axa SA . . . . .	12	Elis SA . . . . .	44
Banque Fédérative du Crédit Mutuel SA . . . . .	13	Enedis SA . . . . .	45
bioMérieux SA . . . . .	14	Engie SA . . . . .	46
BNP Paribas SA . . . . .	15	Eramet SA . . . . .	47
Bolloré SA . . . . .	16	Essilor International SA . . . . .	48
Bonduelle SA . . . . .	17	Europcar Group SA . . . . .	49
Bouygues SA . . . . .	18	Faurecia Automotive Holdings SE . . . . .	50
Bureau Veritas SA . . . . .	19	Financière de l’Odet SA . . . . .	51
Burelle Participations SA . . . . .	20	FNAC Darty SA . . . . .	52
Caisse D’épargne et de Prevoyance Ile-de-France SA . . . . .	21	Galeries Lafayette Haussmann SA . . . . .	53
Capgemini SA . . . . .	22	GFI Informatique SA . . . . .	54
Carrefour SA . . . . .	23	GRDF SA . . . . .	55
Casino Guichard-Perrachon SA . . . . .	24	Group Crit SA . . . . .	56
Catering International & Services SA . . . . .	25	Groupama Assurances Mutuelles SA . . . . .	57
Christian Dior SA . . . . .	26	Groupe ADP SA . . . . .	58
Club Med SAS . . . . .	27	Groupe BPCE SA . . . . .	59
Compagnie de Saint-Gobain SA . . . . .	28	Groupe LDC SA . . . . .	60
Compagnie Générale des Établissements Michelin SCA . . . . .	29	Groupe SNEF SA . . . . .	61
Constantia Flexibles Group GmbH . . . . .	30	Hermès International SA . . . . .	62
Credit Agricole Corporate and Investment Bank SA . . . . .	31	HSBC France SA . . . . .	63
Credit Industriel Et Commercial SA - CIC . . . . .	32	ID Logistics Group SA . . . . .	64
		Iliad SA . . . . .	65
		Imerys SA . . . . .	66

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

IPSOS Group SA . . . . .	67	Safran SA . . . . .	102
JCDecaux SA . . . . .	68	Sanofi SA . . . . .	103
Keolis SA . . . . .	69	Savencia SA . . . . .	104
Kering SA . . . . .	70	Schneider Electric SE . . . . .	105
Kiabi Europe SAS . . . . .	71	SEB SA . . . . .	106
Korian SA . . . . .	72	Société Bic SA . . . . .	107
L'air Liquide SA . . . . .	73	Société Générale SA . . . . .	108
L'Oréal SA . . . . .	74	Sodexo SA . . . . .	109
La Banque Postale SA . . . . .	75	SOMDIAA SA (Société d'Organisation de Management et de Développement des Industries Alimentaires et Agricoles) . . . . .	110
La Poste SA . . . . .	76	Sopra Steria Group SA . . . . .	111
Lagardere SCA . . . . .	77	Spie Batignolles SA . . . . .	112
Legrand SA . . . . .	78	ST microelectronics SA . . . . .	113
Les Mousquetaires SA . . . . .	79	Stahl GmbH . . . . .	114
Lisi Aerospace SAS . . . . .	80	STEF SA . . . . .	115
LVMH Moët Hennessy - Louis Vuitton SE . . . . .	81	Suez Water Technologies and Solutions SA . . . . .	116
Maisons du Monde SA . . . . .	82	Tarkett SA . . . . .	117
Mobivia Groupe SA . . . . .	83	Technicolor SA . . . . .	118
Natixis SA . . . . .	84	Teleperformance SE . . . . .	119
Naval Group SA . . . . .	85	Thales SA . . . . .	120
Nexans SA . . . . .	86	Total SA . . . . .	121
Nexity SA . . . . .	87	Transdev Group SA . . . . .	122
Onet SA . . . . .	88	Tsebo Solutions Group Proprietary Limited . . . . .	123
Orange SA . . . . .	89	Ubisoft Entertainment SA . . . . .	124
Orano SA . . . . .	90	Unibel SA . . . . .	125
Orpea SA . . . . .	91	Valeo SA . . . . .	126
Pernod Ricard SA . . . . .	92	Vallourec SA . . . . .	127
Pierre & Vacances SA . . . . .	93	Veolia Environnement SA . . . . .	128
Plastic Omnium SA . . . . .	94	Vinci SA . . . . .	129
PSA Automobiles SA . . . . .	95	Vivarte SAS . . . . .	130
Publicis Groupe SA . . . . .	96	Vivendi SA . . . . .	131
Rallye SA . . . . .	97	Wendel SA . . . . .	132
Régie Autonome des Transports Parisiens SA . . . . .	98	Worldline SA . . . . .	133
Renault SA . . . . .	99	XPO Logistics Europe SADIR . . . . .	134
Rexel Electrical Supply & Services Holding Limited . . . . .	100		
RTE Réseau de Transport d'électricité SA . . . . .	101		

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Accor SA**

Total Revenue (million EUR): 12,854

Total Assets (million EUR): 4,149

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law** 14/18 (78%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles** 2/13 (15%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency** 6/11 (55%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 22/42 (52%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Air France-KLM SA**

Total Revenue (million EUR): 29,057    Total Assets (million EUR): 26,515

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    12/18 (67%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    2/13 (15%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    2/11 (18%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 16/42 (38%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Airbus Group SE**

Total Revenue (million EUR): 115,198

Total Assets (million EUR): 63,707

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law** 8/18 (44%)

1. Vigilance plan established	● ●
4. Stakeholder input in vigilance plan	● ●
6. Risk mapping and analysis undertaken	● ●
9. Risk mapping in the perspective of potential victims	● ●
10. Risk prioritization within risk mapping	● ●
11. Discussion of suppliers within risk mapping	● ●
12. Discussion of subcontractors within risk mapping	● ●
13. Discussion of subsidiaries within risk mapping	● ●
14. Discussion of labor rights within risk mapping	● ●
18. Discussion of environmental harm in risk mapping	● ●
19. Environmental rights or harms at issue specified	● ●
21. Partner / subsidiary risk assessment procedure	● ●
24. Affirmative steps to address negative impacts	● ●
28. Structure for an alert mechanism included	● ●
29. Specify of what the alert system entails	● ●
32. Monitoring scheme to review action efficacy	● ●
39. Vigilance plan within the management report	● ●
40. Compte rendu or discussion of findings published	● ●

**Conformance with the UN Guiding Principles** 2/13 (15%)

5. Local community input in vigilance plan	● ●
7. Stakeholder input in risk map	● ●
8. Local community input in risk map	● ●

15. Discussion of nondiscrimination within risk map	● ●
25. Office tasked with implementing mitigating action	● ●
26. Office requires upper management sign off	● ●
27. Follow up process to embed mitigation steps	● ●
33. Monitoring scheme by independent third party	● ●
34. Independent audit of subsidiaries and partners	● ●
35. Monitoring scheme includes alert system audit	● ●
36. KPIs for at least one subject matter of the law	● ●
37. KPIs for all four subject matters of the law	● ●
42. Human rights violations published	● ●

**Transparency** 2/11 (18%)

2. Vigilance plan readily accessible within website	● ●
3. Vigilance plan mentions the Devoir de Vigilance law	● ●
16. Forms of discrimination specified in risk mapping	● ●
17. Discriminated groups specified in risk mapping	● ●
20. Specific location of risks provided	● ●
22. Frequency of risk mapping update stated	● ●
23. Frequency of vigilance plan update stated	● ●
30. Alert system managed by a third party	● ●
31. Alert system outcomes published	● ●
38. KPIs used to report on due diligence outcomes	● ●
41. Lessons learned in first year reported in detail	● ●

Combined score: 12/42 (29%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Alstom SA**

Total Revenue (million EUR): 13,410    Total Assets (million EUR): 8,072

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    14/18 (78%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    7/13 (54%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    6/11 (55%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 27/42 (64%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Alten SA**

Total Revenue (million EUR): 1,662

Total Assets (million EUR): 2,270

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law** 11/18 (61%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles** 0/13 (0%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency** 3/11 (27%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 14/42 (33%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Altice France SA**

Total Revenue (million EUR): 11,479    Total Assets (million EUR): 10,187

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    0/18 (0%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    0/13 (0%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    0/11 (0%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 0/42 (0%)



## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Altran Technologies SA**

Total Revenue (million EUR): 4,662    Total Assets (million EUR): 2,916

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    4/18 (22%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    0/13 (0%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    2/11 (18%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 6/42 (14%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**ArcelorMittal Atlantique et Lorraine SAS**

Total Revenue (million EUR): 100,374    Total Assets (million EUR): 83,636

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    10/18 (56%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    2/13 (15%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    2/11 (18%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 14/42 (33%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Arkema SA**

Total Revenue (million EUR): 10,111    Total Assets (million EUR): 8,816

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    16/18 (89%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    4/13 (31%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    7/11 (64%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 27/42 (64%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Atos SE**

Total Revenue (million EUR): 21,576    Total Assets (million EUR): 12,258

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    10/18 (56%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    7/13 (54%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    3/11 (27%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 20/42 (48%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Auchan Holding SA**

Total Revenue (million EUR): 35,935    Total Assets (million EUR): 50,986

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    11/18 (61%)

1. Vigilance plan established	● ●
4. Stakeholder input in vigilance plan	● ●
6. Risk mapping and analysis undertaken	● ●
9. Risk mapping in the perspective of potential victims	● ●
10. Risk prioritization within risk mapping	● ●
11. Discussion of suppliers within risk mapping	● ●
12. Discussion of subcontractors within risk mapping	● ●
13. Discussion of subsidiaries within risk mapping	● ●
14. Discussion of labor rights within risk mapping	● ●
18. Discussion of environmental harm in risk mapping	● ●
19. Environmental rights or harms at issue specified	● ●
21. Partner / subsidiary risk assessment procedure	● ●
24. Affirmative steps to address negative impacts	● ●
28. Structure for an alert mechanism included	● ●
29. Specify of what the alert system entails	● ●
32. Monitoring scheme to review action efficacy	● ●
39. Vigilance plan within the management report	● ●
40. Compte rendu or discussion of findings published	● ●

**Conformance with the UN Guiding Principles**    3/13 (23%)

5. Local community input in vigilance plan	● ●
7. Stakeholder input in risk map	● ●
8. Local community input in risk map	● ●

15. Discussion of nondiscrimination within risk map	● ●
25. Office tasked with implementing mitigating action	● ●
26. Office requires upper management sign off	● ●
27. Follow up process to embed mitigation steps	● ●
33. Monitoring scheme by independent third party	● ●
34. Independent audit of subsidiaries and partners	● ●
35. Monitoring scheme includes alert system audit	● ●
36. KPIs for at least one subject matter of the law	● ●
37. KPIs for all four subject matters of the law	● ●
42. Human rights violations published	● ●

**Transparency**    6/11 (55%)

2. Vigilance plan readily accessible within website	● ●
3. Vigilance plan mentions the Devoir de Vigilance law	● ●
16. Forms of discrimination specified in risk mapping	● ●
17. Discriminated groups specified in risk mapping	● ●
20. Specific location of risks provided	● ●
22. Frequency of risk mapping update stated	● ●
23. Frequency of vigilance plan update stated	● ●
30. Alert system managed by a third party	● ●
31. Alert system outcomes published	● ●
38. KPIs used to report on due diligence outcomes	● ●
41. Lessons learned in first year reported in detail	● ●

Combined score: 20/42 (48%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Axa SA**

Total Revenue (million EUR): 930,695    Total Assets (million EUR): 102,874

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    15/18 (83%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    6/13 (46%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    4/11 (36%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 25/42 (60%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Banque Fédérative du Crédit Mutuel SA**

Total Revenue (million EUR): 535,112    Total Assets (million EUR): 12,083

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    12/18 (67%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    1/13 (8%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    3/11 (27%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 16/42 (38%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**bioMérieux SA**

Total Revenue (million EUR): 3,390    Total Assets (million EUR): 2,421

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    0/18 (0%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    0/13 (0%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    0/11 (0%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 0/42 (0%)



## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**BNP Paribas SA**

Total Revenue (million EUR): 2,040,836    Total Assets (million EUR): 33,333

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    15/18 (83%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    3/13 (23%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    5/11 (45%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 23/42 (55%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Bolloré SA**

Total Revenue (million EUR): 55,429    Total Assets (million EUR): 23,024

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    16/18 (89%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    6/13 (46%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    7/11 (64%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 29/42 (69%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Bonduelle SA**

Total Revenue (million EUR): 2,027

Total Assets (million EUR): 2,777

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law** 14/18 (78%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles** 0/13 (0%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency** 5/11 (45%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 19/42 (45%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Bouygues SA**

Total Revenue (million EUR): 36,303    Total Assets (million EUR): 35,555

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    15/18 (83%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    5/13 (38%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    4/11 (36%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 24/42 (57%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Bureau Veritas SA**

Total Revenue (million EUR): 6,096

Total Assets (million EUR): 4,796

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law** 16/18 (89%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles** 2/13 (15%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency** 6/11 (55%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 24/42 (57%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Burelle Participations SA**

Total Revenue (million EUR): 7,022    Total Assets (million EUR): 9,000

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    3/18 (17%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    0/13 (0%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    2/11 (18%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 5/42 (12%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Caisse D’épargne et de Prevoyance Ile-de-France SA**

Total Revenue (million EUR): 66,651    Total Assets (million EUR): 1,107

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    12/18 (67%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    3/13 (23%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    5/11 (45%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 20/42 (48%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Capgemini SA**

Total Revenue (million EUR): 16,498    Total Assets (million EUR): 13,197

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    10/18 (56%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    3/13 (23%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    5/11 (45%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 18/42 (43%)



## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Carrefour SA**

Total Revenue (million EUR): 47,378    Total Assets (million EUR): 77,917

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    17/18 (94%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    6/13 (46%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    8/11 (73%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 31/42 (74%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Casino Guichard-Perrachon SA**

Total Revenue (million EUR): 37,440    Total Assets (million EUR): 37,136

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    14/18 (78%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    5/13 (38%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    5/11 (45%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 24/42 (57%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Catering International & Services SA**

 Total Revenue (million EUR): 129    Total Assets (million EUR): 224    **Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    10/18 (56%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    0/13 (0%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    4/11 (36%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 14/42 (33%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Christian Dior SA**

Total Revenue (million EUR): 77,300    Total Assets (million EUR): 46,826

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    13/18 (72%)

1. Vigilance plan established	● ●
4. Stakeholder input in vigilance plan	● ●
6. Risk mapping and analysis undertaken	● ●
9. Risk mapping in the perspective of potential victims	● ●
10. Risk prioritization within risk mapping	● ●
11. Discussion of suppliers within risk mapping	● ●
12. Discussion of subcontractors within risk mapping	● ●
13. Discussion of subsidiaries within risk mapping	● ●
14. Discussion of labor rights within risk mapping	● ●
18. Discussion of environmental harm in risk mapping	● ●
19. Environmental rights or harms at issue specified	● ●
21. Partner / subsidiary risk assessment procedure	● ●
24. Affirmative steps to address negative impacts	● ●
28. Structure for an alert mechanism included	● ●
29. Specify of what the alert system entails	● ●
32. Monitoring scheme to review action efficacy	● ●
39. Vigilance plan within the management report	● ●
40. Compte rendu or discussion of findings published	● ●

**Conformance with the UN Guiding Principles**    5/13 (38%)

5. Local community input in vigilance plan	● ●
7. Stakeholder input in risk map	● ●
8. Local community input in risk map	● ●

15. Discussion of nondiscrimination within risk map	● ●
25. Office tasked with implementing mitigating action	● ●
26. Office requires upper management sign off	● ●
27. Follow up process to embed mitigation steps	● ●
33. Monitoring scheme by independent third party	● ●
34. Independent audit of subsidiaries and partners	● ●
35. Monitoring scheme includes alert system audit	● ●
36. KPIs for at least one subject matter of the law	● ●
37. KPIs for all four subject matters of the law	● ●
42. Human rights violations published	● ●

**Transparency**    3/11 (27%)

2. Vigilance plan readily accessible within website	● ●
3. Vigilance plan mentions the Devoir de Vigilance law	● ●
16. Forms of discrimination specified in risk mapping	● ●
17. Discriminated groups specified in risk mapping	● ●
20. Specific location of risks provided	● ●
22. Frequency of risk mapping update stated	● ●
23. Frequency of vigilance plan update stated	● ●
30. Alert system managed by a third party	● ●
31. Alert system outcomes published	● ●
38. KPIs used to report on due diligence outcomes	● ●
41. Lessons learned in first year reported in detail	● ●

Combined score: 21/42 (50%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Club Med SAS**

 Total Revenue (million EUR): 955    Total Assets (million EUR): 1,600    **Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    13/18 (72%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    5/13 (38%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    4/11 (36%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 22/42 (52%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Compagnie de Saint-Gobain SA**

Total Revenue (million EUR): 44,042    Total Assets (million EUR): 1,471

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    12/18 (67%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    4/13 (31%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    2/11 (18%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 18/42 (43%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Compagnie Générale des Établissements Michelin SCA**

Total Revenue (million EUR): 29,448    Total Assets (million EUR): 22,028

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    14/18 (78%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    8/13 (62%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    11/11 (100%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 33/42 (79%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Constantia Flexibles Group GmbH**

Total Revenue (million EUR): 2,280

Total Assets (million EUR): 1,538

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law** 13/18 (72%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles** 4/13 (31%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency** 5/11 (45%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 22/42 (52%)



## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Credit Agricole Corporate and Investment Bank SA**

Total Revenue (million EUR): 1,624,400    Total Assets (million EUR): 18,634

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    15/18 (83%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    8/13 (62%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    7/11 (64%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 30/42 (71%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Credit Industriel Et Commercial SA - CIC**

Total Revenue (million EUR): 294,704    Total Assets (million EUR): 5,021

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    15/18 (83%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    1/13 (8%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    2/11 (18%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 18/42 (43%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Credit Mutuel Arkea SA**

Total Revenue (million EUR): 134,920    Total Assets (million EUR): 2,164

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    14/18 (78%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    3/13 (23%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    4/11 (36%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 21/42 (50%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Cromology SAS**

 Total Revenue (million EUR): 811    Total Assets (million EUR): 668    **Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    11/18 (61%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    5/13 (38%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    5/11 (45%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 21/42 (50%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Danone SA**

Total Revenue (million EUR): 44,177    Total Assets (million EUR): 24,651

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    14/18 (78%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    1/13 (8%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    4/11 (36%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 19/42 (45%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Dassault Aviation SA**

Total Revenue (million EUR): 17,053    Total Assets (million EUR): 5,119

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    8/18 (44%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    0/13 (0%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    2/11 (18%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 10/42 (24%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Dassault Systemes SE**

Total Revenue (million EUR): 7,974    Total Assets (million EUR): 3,477

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    7/18 (39%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    2/13 (15%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    3/11 (27%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 12/42 (29%)

“Devoir de Vigilance: Reforming Corporate Risk Engagement”

Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

## Decathlon SA

Total Revenue (million EUR): NA    Total Assets (million EUR): 12,800    **Vigilance plan statement**

### Compliance with the Devoir de Vigilance law 13/18 (72%)

- 1. Vigilance plan established ● ●
- 4. Stakeholder input in vigilance plan ● ●
- 6. Risk mapping and analysis undertaken ● ●
- 9. Risk mapping in the perspective of potential victims ● ●
- 10. Risk prioritization within risk mapping ● ●
- 11. Discussion of suppliers within risk mapping ● ●
- 12. Discussion of subcontractors within risk mapping ● ●
- 13. Discussion of subsidiaries within risk mapping ● ●
- 14. Discussion of labor rights within risk mapping ● ●
- 18. Discussion of environmental harm in risk mapping ● ●
- 19. Environmental rights or harms at issue specified ● ●
- 21. Partner / subsidiary risk assessment procedure ● ●
- 24. Affirmative steps to address negative impacts ● ●
- 28. Structure for an alert mechanism included ● ●
- 29. Specify of what the alert system entails ● ●
- 32. Monitoring scheme to review action efficacy ● ●
- 39. Vigilance plan within the management report ● ●
- 40. Compte rendu or discussion of findings published ● ●

### Conformance with the UN Guiding Principles 4/13 (31%)

- 5. Local community input in vigilance plan ● ●
- 7. Stakeholder input in risk map ● ●
- 8. Local community input in risk map ● ●

- 15. Discussion of nondiscrimination within risk map ● ●
- 25. Office tasked with implementing mitigating action ● ●
- 26. Office requires upper management sign off ● ●
- 27. Follow up process to embed mitigation steps ● ●
- 33. Monitoring scheme by independent third party ● ●
- 34. Independent audit of subsidiaries and partners ● ●
- 35. Monitoring scheme includes alert system audit ● ●
- 36. KPIs for at least one subject matter of the law ● ●
- 37. KPIs for all four subject matters of the law ● ●
- 42. Human rights violations published ● ●

### Transparency 7/11 (64%)

- 2. Vigilance plan readily accessible within website ● ●
- 3. Vigilance plan mentions the Devoir de Vigilance law ● ●
- 16. Forms of discrimination specified in risk mapping ● ●
- 17. Discriminated groups specified in risk mapping ● ●
- 20. Specific location of risks provided ● ●
- 22. Frequency of risk mapping update stated ● ●
- 23. Frequency of vigilance plan update stated ● ●
- 30. Alert system managed by a third party ● ●
- 31. Alert system outcomes published ● ●
- 38. KPIs used to report on due diligence outcomes ● ●
- 41. Lessons learned in first year reported in detail ● ●

Combined score: 24/42 (57%)



## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Derichebourg Propreté SA**

Total Revenue (million EUR): 1,413

Total Assets (million EUR): 2,920

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law** 12/18 (67%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles** 3/13 (23%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency** 2/11 (18%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 17/42 (40%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**EGIS SA**

Total Revenue (million EUR): 1,573    Total Assets (million EUR): 1,074

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    2/18 (11%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    0/13 (0%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    0/11 (0%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 2/42 (5%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Eiffage Infrastructures SAS**

Total Revenue (million EUR): 18,571    Total Assets (million EUR): 16,557

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    13/18 (72%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    4/13 (31%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    2/11 (18%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 19/42 (45%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Electricite de France SA**

Total Revenue (million EUR): 283,169

Total Assets (million EUR): 44,874

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law** 16/18 (89%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles** 6/13 (46%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency** 7/11 (64%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 29/42 (69%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Elior Group SA**

Total Revenue (million EUR): 5,366

Total Assets (million EUR): 4,886

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law** 7/18 (39%)

1. Vigilance plan established	● ●
4. Stakeholder input in vigilance plan	● ●
6. Risk mapping and analysis undertaken	● ●
9. Risk mapping in the perspective of potential victims	● ●
10. Risk prioritization within risk mapping	● ●
11. Discussion of suppliers within risk mapping	● ●
12. Discussion of subcontractors within risk mapping	● ●
13. Discussion of subsidiaries within risk mapping	● ●
14. Discussion of labor rights within risk mapping	● ●
18. Discussion of environmental harm in risk mapping	● ●
19. Environmental rights or harms at issue specified	● ●
21. Partner / subsidiary risk assessment procedure	● ●
24. Affirmative steps to address negative impacts	● ●
28. Structure for an alert mechanism included	● ●
29. Specify of what the alert system entails	● ●
32. Monitoring scheme to review action efficacy	● ●
39. Vigilance plan within the management report	● ●
40. Compte rendu or discussion of findings published	● ●

**Conformance with the UN Guiding Principles** 1/13 (8%)

5. Local community input in vigilance plan	● ●
7. Stakeholder input in risk map	● ●
8. Local community input in risk map	● ●

15. Discussion of nondiscrimination within risk map	● ●
25. Office tasked with implementing mitigating action	● ●
26. Office requires upper management sign off	● ●
27. Follow up process to embed mitigation steps	● ●
33. Monitoring scheme by independent third party	● ●
34. Independent audit of subsidiaries and partners	● ●
35. Monitoring scheme includes alert system audit	● ●
36. KPIs for at least one subject matter of the law	● ●
37. KPIs for all four subject matters of the law	● ●
42. Human rights violations published	● ●

**Transparency** 2/11 (18%)

2. Vigilance plan readily accessible within website	● ●
3. Vigilance plan mentions the Devoir de Vigilance law	● ●
16. Forms of discrimination specified in risk mapping	● ●
17. Discriminated groups specified in risk mapping	● ●
20. Specific location of risks provided	● ●
22. Frequency of risk mapping update stated	● ●
23. Frequency of vigilance plan update stated	● ●
30. Alert system managed by a third party	● ●
31. Alert system outcomes published	● ●
38. KPIs used to report on due diligence outcomes	● ●
41. Lessons learned in first year reported in detail	● ●

Combined score: 10/42 (24%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Elis SA**

Total Revenue (million EUR): 7,795

Total Assets (million EUR): 3,133

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law** 14/18 (78%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles** 4/13 (31%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency** 5/11 (45%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 23/42 (55%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Enedis SA**

Total Revenue (million EUR): 283,000

Total Assets (million EUR): 14,000

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**

2/18 (11%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**

2/13 (15%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**

3/11 (27%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 7/42 (17%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Engie SA**

Total Revenue (million EUR): 153,702    Total Assets (million EUR): 60,596

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    15/18 (83%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    5/13 (38%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    5/11 (45%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 25/42 (60%)



## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Eramet SA**

Total Revenue (million EUR): 5,995

Total Assets (million EUR): 3,725

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law** 16/18 (89%)

1. Vigilance plan established	● ●
4. Stakeholder input in vigilance plan	● ●
6. Risk mapping and analysis undertaken	● ●
9. Risk mapping in the perspective of potential victims	● ●
10. Risk prioritization within risk mapping	● ●
11. Discussion of suppliers within risk mapping	● ●
12. Discussion of subcontractors within risk mapping	● ●
13. Discussion of subsidiaries within risk mapping	● ●
14. Discussion of labor rights within risk mapping	● ●
18. Discussion of environmental harm in risk mapping	● ●
19. Environmental rights or harms at issue specified	● ●
21. Partner / subsidiary risk assessment procedure	● ●
24. Affirmative steps to address negative impacts	● ●
28. Structure for an alert mechanism included	● ●
29. Specify of what the alert system entails	● ●
32. Monitoring scheme to review action efficacy	● ●
39. Vigilance plan within the management report	● ●
40. Compte rendu or discussion of findings published	● ●

**Conformance with the UN Guiding Principles** 4/13 (31%)

5. Local community input in vigilance plan	● ●
7. Stakeholder input in risk map	● ●
8. Local community input in risk map	● ●

15. Discussion of nondiscrimination within risk map	● ●
25. Office tasked with implementing mitigating action	● ●
26. Office requires upper management sign off	● ●
27. Follow up process to embed mitigation steps	● ●
33. Monitoring scheme by independent third party	● ●
34. Independent audit of subsidiaries and partners	● ●
35. Monitoring scheme includes alert system audit	● ●
36. KPIs for at least one subject matter of the law	● ●
37. KPIs for all four subject matters of the law	● ●
42. Human rights violations published	● ●

**Transparency** 5/11 (45%)

2. Vigilance plan readily accessible within website	● ●
3. Vigilance plan mentions the Devoir de Vigilance law	● ●
16. Forms of discrimination specified in risk mapping	● ●
17. Discriminated groups specified in risk mapping	● ●
20. Specific location of risks provided	● ●
22. Frequency of risk mapping update stated	● ●
23. Frequency of vigilance plan update stated	● ●
30. Alert system managed by a third party	● ●
31. Alert system outcomes published	● ●
38. KPIs used to report on due diligence outcomes	● ●
41. Lessons learned in first year reported in detail	● ●

Combined score: 25/42 (60%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Essilor International SA**

Total Revenue (million EUR): 46,269    Total Assets (million EUR): 10,799

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    15/18 (83%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    7/13 (54%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    3/11 (27%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 25/42 (60%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Europcar Group SA**

Total Revenue (million EUR): 6,495

Total Assets (million EUR): 2,929

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law** 5/18 (28%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles** 2/13 (15%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency** 3/11 (27%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 10/42 (24%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Faurecia Automotive Holdings SE**

Total Revenue (million EUR): 13,395    Total Assets (million EUR): 17,525

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    13/18 (72%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    7/13 (54%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    4/11 (36%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 24/42 (57%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Financière de l’Odet SA**

Total Revenue (million EUR): 53,539    Total Assets (million EUR): 23,024

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    16/18 (89%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    6/13 (46%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    7/11 (64%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 29/42 (69%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**FNAC Darty SA**

Total Revenue (million EUR): 5,511    Total Assets (million EUR): 7,500

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    8/18 (44%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    0/13 (0%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    3/11 (27%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 11/42 (26%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Galeries Lafayette Haussmann SA**

 Total Revenue (million EUR): NA    Total Assets (million EUR): 77,069    **Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    12/18 (67%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    2/13 (15%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    4/11 (36%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 18/42 (43%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**GFI Informatique SA**

 Total Revenue (million EUR): 1,258    Total Assets (million EUR): 743    **Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    10/18 (56%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    3/13 (23%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    2/11 (18%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 15/42 (36%)



## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**GRDF SA**

 Total Revenue (million EUR): NA    Total Assets (million EUR): 2,298    **Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    10/18 (56%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    4/13 (31%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    4/11 (36%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 18/42 (43%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Group Crit SA**

Total Revenue (million EUR): 1,275    Total Assets (million EUR): 2,498

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    7/18 (39%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    3/13 (23%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    4/11 (36%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 14/42 (33%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Groupama Assurances Mutuelles SA**

Total Revenue (million EUR): 88,506    Total Assets (million EUR): 10,649

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    3/18 (17%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    0/13 (0%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    2/11 (18%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 5/42 (12%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Groupe ADP SA**

Total Revenue (million EUR): 16,067

Total Assets (million EUR): 4,478

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law** 13/18 (72%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles** 3/13 (23%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency** 3/11 (27%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 19/42 (45%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Groupe BPCE SA**

Total Revenue (million EUR): 1,273,926    Total Assets (million EUR): 3,819

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    13/18 (72%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    1/13 (8%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    5/11 (45%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 19/42 (45%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Groupe LDC SA**

Total Revenue (million EUR): 2,191

Total Assets (million EUR): 4,124

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law** 8/18 (44%)

1. Vigilance plan established	● ●
4. Stakeholder input in vigilance plan	● ●
6. Risk mapping and analysis undertaken	● ●
9. Risk mapping in the perspective of potential victims	● ●
10. Risk prioritization within risk mapping	● ●
11. Discussion of suppliers within risk mapping	● ●
12. Discussion of subcontractors within risk mapping	● ●
13. Discussion of subsidiaries within risk mapping	● ●
14. Discussion of labor rights within risk mapping	● ●
18. Discussion of environmental harm in risk mapping	● ●
19. Environmental rights or harms at issue specified	● ●
21. Partner / subsidiary risk assessment procedure	● ●
24. Affirmative steps to address negative impacts	● ●
28. Structure for an alert mechanism included	● ●
29. Specify of what the alert system entails	● ●
32. Monitoring scheme to review action efficacy	● ●
39. Vigilance plan within the management report	● ●
40. Compte rendu or discussion of findings published	● ●

**Conformance with the UN Guiding Principles** 2/13 (15%)

5. Local community input in vigilance plan	● ●
7. Stakeholder input in risk map	● ●
8. Local community input in risk map	● ●

15. Discussion of nondiscrimination within risk map	● ●
25. Office tasked with implementing mitigating action	● ●
26. Office requires upper management sign off	● ●
27. Follow up process to embed mitigation steps	● ●
33. Monitoring scheme by independent third party	● ●
34. Independent audit of subsidiaries and partners	● ●
35. Monitoring scheme includes alert system audit	● ●
36. KPIs for at least one subject matter of the law	● ●
37. KPIs for all four subject matters of the law	● ●
42. Human rights violations published	● ●

**Transparency** 4/11 (36%)

2. Vigilance plan readily accessible within website	● ●
3. Vigilance plan mentions the Devoir de Vigilance law	● ●
16. Forms of discrimination specified in risk mapping	● ●
17. Discriminated groups specified in risk mapping	● ●
20. Specific location of risks provided	● ●
22. Frequency of risk mapping update stated	● ●
23. Frequency of vigilance plan update stated	● ●
30. Alert system managed by a third party	● ●
31. Alert system outcomes published	● ●
38. KPIs used to report on due diligence outcomes	● ●
41. Lessons learned in first year reported in detail	● ●

Combined score: 14/42 (33%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Groupe SNEF SA**

 Total Revenue (million EUR): 984    Total Assets (million EUR): 1,241    **Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    5/18 (28%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    2/13 (15%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    2/11 (18%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 9/42 (21%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Hermès International SA**

Total Revenue (million EUR): 7,468

Total Assets (million EUR): 5,966

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law** 14/18 (78%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles** 4/13 (31%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency** 4/11 (36%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 22/42 (52%)



## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**HSBC France SA**

Total Revenue (million EUR): 180,946

Total Assets (million EUR): 1,736

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**

6/18 (33%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**

3/13 (23%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**

3/11 (27%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 12/42 (29%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**ID Logistics Group SA**

 Total Revenue (million EUR): 755    Total Assets (million EUR): 1,410    **Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    14/18 (78%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    3/13 (23%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    4/11 (36%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 21/42 (50%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Iliad SA**

Total Revenue (million EUR): 11,252    Total Assets (million EUR): 4,891

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    6/18 (33%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    1/13 (8%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    2/11 (18%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 9/42 (21%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Imerys SA**

Total Revenue (million EUR): 7,594

Total Assets (million EUR): 4,590

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law** 14/18 (78%)

1. Vigilance plan established	● ●
4. Stakeholder input in vigilance plan	● ●
6. Risk mapping and analysis undertaken	● ●
9. Risk mapping in the perspective of potential victims	● ●
10. Risk prioritization within risk mapping	● ●
11. Discussion of suppliers within risk mapping	● ●
12. Discussion of subcontractors within risk mapping	● ●
13. Discussion of subsidiaries within risk mapping	● ●
14. Discussion of labor rights within risk mapping	● ●
18. Discussion of environmental harm in risk mapping	● ●
19. Environmental rights or harms at issue specified	● ●
21. Partner / subsidiary risk assessment procedure	● ●
24. Affirmative steps to address negative impacts	● ●
28. Structure for an alert mechanism included	● ●
29. Specify of what the alert system entails	● ●
32. Monitoring scheme to review action efficacy	● ●
39. Vigilance plan within the management report	● ●
40. Compte rendu or discussion of findings published	● ●

**Conformance with the UN Guiding Principles** 6/13 (46%)

5. Local community input in vigilance plan	● ●
7. Stakeholder input in risk map	● ●
8. Local community input in risk map	● ●

15. Discussion of nondiscrimination within risk map	● ●
25. Office tasked with implementing mitigating action	● ●
26. Office requires upper management sign off	● ●
27. Follow up process to embed mitigation steps	● ●
33. Monitoring scheme by independent third party	● ●
34. Independent audit of subsidiaries and partners	● ●
35. Monitoring scheme includes alert system audit	● ●
36. KPIs for at least one subject matter of the law	● ●
37. KPIs for all four subject matters of the law	● ●
42. Human rights violations published	● ●

**Transparency** 7/11 (64%)

2. Vigilance plan readily accessible within website	● ●
3. Vigilance plan mentions the Devoir de Vigilance law	● ●
16. Forms of discrimination specified in risk mapping	● ●
17. Discriminated groups specified in risk mapping	● ●
20. Specific location of risks provided	● ●
22. Frequency of risk mapping update stated	● ●
23. Frequency of vigilance plan update stated	● ●
30. Alert system managed by a third party	● ●
31. Alert system outcomes published	● ●
38. KPIs used to report on due diligence outcomes	● ●
41. Lessons learned in first year reported in detail	● ●

Combined score: 27/42 (64%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**IPSOS Group SA**

Total Revenue (million EUR): 2,375    Total Assets (million EUR): 1,749

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    9/18 (50%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    2/13 (15%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    4/11 (36%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 15/42 (36%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**JCDecaux SA**

Total Revenue (million EUR): 5,762

Total Assets (million EUR): 3,619

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law** 16/18 (89%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles** 5/13 (38%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency** 6/11 (55%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 27/42 (64%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Keolis SA**

 Total Revenue (million EUR): 3,337    Total Assets (million EUR): 5,624    **Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    15/18 (83%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    8/13 (62%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    5/11 (45%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 28/42 (67%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Kering SA**

Total Revenue (million EUR): 21,368    Total Assets (million EUR): 13,665

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    17/18 (94%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    6/13 (46%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    4/11 (36%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 27/42 (64%)



## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Kiabi Europe SAS**

 Total Revenue (million EUR): NA    Total Assets (million EUR): 1,174    **Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    9/18 (50%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    5/13 (38%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    5/11 (45%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 19/42 (45%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Korian SA**

Total Revenue (million EUR): 4,559

Total Assets (million EUR): 3,336

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law** 14/18 (78%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles** 9/13 (69%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency** 5/11 (45%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 28/42 (67%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**L'air Liquide SA**

Total Revenue (million EUR): 41,027    Total Assets (million EUR): 21,011

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    13/18 (72%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    5/13 (38%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    3/11 (27%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 21/42 (50%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**L'Oréal SA**

Total Revenue (million EUR): 38,458    Total Assets (million EUR): 26,937

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    16/18 (89%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    7/13 (54%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    9/11 (82%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 32/42 (76%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**La Banque Postale SA**

Total Revenue (million EUR): 245,201    Total Assets (million EUR): 6,910

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    5/18 (28%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    1/13 (8%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    2/11 (18%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 8/42 (19%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**La Poste SA**

Total Revenue (million EUR): 261,509

Total Assets (million EUR): 24,700

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law** 11/18 (61%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles** 3/13 (23%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency** 3/11 (27%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 17/42 (40%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Lagardere SCA**

Total Revenue (million EUR): 8,219

Total Assets (million EUR): 7,258

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law** 7/18 (39%)

1. Vigilance plan established	● ●
4. Stakeholder input in vigilance plan	● ●
6. Risk mapping and analysis undertaken	● ●
9. Risk mapping in the perspective of potential victims	● ●
10. Risk prioritization within risk mapping	● ●
11. Discussion of suppliers within risk mapping	● ●
12. Discussion of subcontractors within risk mapping	● ●
13. Discussion of subsidiaries within risk mapping	● ●
14. Discussion of labor rights within risk mapping	● ●
18. Discussion of environmental harm in risk mapping	● ●
19. Environmental rights or harms at issue specified	● ●
21. Partner / subsidiary risk assessment procedure	● ●
24. Affirmative steps to address negative impacts	● ●
28. Structure for an alert mechanism included	● ●
29. Specify of what the alert system entails	● ●
32. Monitoring scheme to review action efficacy	● ●
39. Vigilance plan within the management report	● ●
40. Compte rendu or discussion of findings published	● ●

**Conformance with the UN Guiding Principles** 0/13 (0%)

5. Local community input in vigilance plan	● ●
7. Stakeholder input in risk map	● ●
8. Local community input in risk map	● ●

15. Discussion of nondiscrimination within risk map	● ●
25. Office tasked with implementing mitigating action	● ●
26. Office requires upper management sign off	● ●
27. Follow up process to embed mitigation steps	● ●
33. Monitoring scheme by independent third party	● ●
34. Independent audit of subsidiaries and partners	● ●
35. Monitoring scheme includes alert system audit	● ●
36. KPIs for at least one subject matter of the law	● ●
37. KPIs for all four subject matters of the law	● ●
42. Human rights violations published	● ●

**Transparency** 2/11 (18%)

2. Vigilance plan readily accessible within website	● ●
3. Vigilance plan mentions the Devoir de Vigilance law	● ●
16. Forms of discrimination specified in risk mapping	● ●
17. Discriminated groups specified in risk mapping	● ●
20. Specific location of risks provided	● ●
22. Frequency of risk mapping update stated	● ●
23. Frequency of vigilance plan update stated	● ●
30. Alert system managed by a third party	● ●
31. Alert system outcomes published	● ●
38. KPIs used to report on due diligence outcomes	● ●
41. Lessons learned in first year reported in detail	● ●

Combined score: 9/42 (21%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Legrand SA**

Total Revenue (million EUR): 10,306

Total Assets (million EUR): 5,997

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law** 16/18 (89%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles** 4/13 (31%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency** 7/11 (64%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 27/42 (64%)



## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Les Mousquetaires SA**

Total Revenue (million EUR): 5,650    Total Assets (million EUR): 34,800

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    5/18 (28%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    1/13 (8%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    2/11 (18%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 8/42 (19%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Lisi Aerospace SAS**

Total Revenue (million EUR): 1,866

Total Assets (million EUR): 1,694

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law** 5/18 (28%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles** 0/13 (0%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency** 1/11 (9%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 6/42 (14%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**LVMH Moët Hennessy - Louis Vuitton SE**

Total Revenue (million EUR): 74,300    Total Assets (million EUR): 46,826

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    8/18 (44%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    3/13 (23%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    2/11 (18%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 13/42 (31%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Maisons du Monde SA**

Total Revenue (million EUR): 1,211

Total Assets (million EUR): 1,143

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law** 10/18 (56%)

1. Vigilance plan established	● ●
4. Stakeholder input in vigilance plan	● ●
6. Risk mapping and analysis undertaken	● ●
9. Risk mapping in the perspective of potential victims	● ●
10. Risk prioritization within risk mapping	● ●
11. Discussion of suppliers within risk mapping	● ●
12. Discussion of subcontractors within risk mapping	● ●
13. Discussion of subsidiaries within risk mapping	● ●
14. Discussion of labor rights within risk mapping	● ●
18. Discussion of environmental harm in risk mapping	● ●
19. Environmental rights or harms at issue specified	● ●
21. Partner / subsidiary risk assessment procedure	● ●
24. Affirmative steps to address negative impacts	● ●
28. Structure for an alert mechanism included	● ●
29. Specify of what the alert system entails	● ●
32. Monitoring scheme to review action efficacy	● ●
39. Vigilance plan within the management report	● ●
40. Compte rendu or discussion of findings published	● ●

**Conformance with the UN Guiding Principles** 3/13 (23%)

5. Local community input in vigilance plan	● ●
7. Stakeholder input in risk map	● ●
8. Local community input in risk map	● ●

15. Discussion of nondiscrimination within risk map	● ●
25. Office tasked with implementing mitigating action	● ●
26. Office requires upper management sign off	● ●
27. Follow up process to embed mitigation steps	● ●
33. Monitoring scheme by independent third party	● ●
34. Independent audit of subsidiaries and partners	● ●
35. Monitoring scheme includes alert system audit	● ●
36. KPIs for at least one subject matter of the law	● ●
37. KPIs for all four subject matters of the law	● ●
42. Human rights violations published	● ●

**Transparency** 3/11 (27%)

2. Vigilance plan readily accessible within website	● ●
3. Vigilance plan mentions the Devoir de Vigilance law	● ●
16. Forms of discrimination specified in risk mapping	● ●
17. Discriminated groups specified in risk mapping	● ●
20. Specific location of risks provided	● ●
22. Frequency of risk mapping update stated	● ●
23. Frequency of vigilance plan update stated	● ●
30. Alert system managed by a third party	● ●
31. Alert system outcomes published	● ●
38. KPIs used to report on due diligence outcomes	● ●
41. Lessons learned in first year reported in detail	● ●

Combined score: 16/42 (38%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Mobivia Groupe SA**

 Total Revenue (million EUR): NA    Total Assets (million EUR): 2,700    **Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    8/18 (44%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    2/13 (15%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    3/11 (27%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 13/42 (31%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Natixis SA**

Total Revenue (million EUR): 495,500

Total Assets (million EUR): 9,616

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law** 11/18 (61%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles** 2/13 (15%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency** 2/11 (18%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 15/42 (36%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Naval Group SA**

Total Revenue (million EUR): 15,693

Total Assets (million EUR): 3,608

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law** 14/18 (78%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles** 3/13 (23%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency** 3/11 (27%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 20/42 (48%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Nexans SA**

Total Revenue (million EUR): 5,119

Total Assets (million EUR): 65,000

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law** 14/18 (78%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles** 2/13 (15%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency** 3/11 (27%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 19/42 (45%)



## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Nexity SA**

Total Revenue (million EUR): 7,616

Total Assets (million EUR): 4,135

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law** 14/18 (78%)

1. Vigilance plan established	● ●
4. Stakeholder input in vigilance plan	● ●
6. Risk mapping and analysis undertaken	● ●
9. Risk mapping in the perspective of potential victims	● ●
10. Risk prioritization within risk mapping	● ●
11. Discussion of suppliers within risk mapping	● ●
12. Discussion of subcontractors within risk mapping	● ●
13. Discussion of subsidiaries within risk mapping	● ●
14. Discussion of labor rights within risk mapping	● ●
18. Discussion of environmental harm in risk mapping	● ●
19. Environmental rights or harms at issue specified	● ●
21. Partner / subsidiary risk assessment procedure	● ●
24. Affirmative steps to address negative impacts	● ●
28. Structure for an alert mechanism included	● ●
29. Specify of what the alert system entails	● ●
32. Monitoring scheme to review action efficacy	● ●
39. Vigilance plan within the management report	● ●
40. Compte rendu or discussion of findings published	● ●

**Conformance with the UN Guiding Principles** 3/13 (23%)

5. Local community input in vigilance plan	● ●
7. Stakeholder input in risk map	● ●
8. Local community input in risk map	● ●

15. Discussion of nondiscrimination within risk map	● ●
25. Office tasked with implementing mitigating action	● ●
26. Office requires upper management sign off	● ●
27. Follow up process to embed mitigation steps	● ●
33. Monitoring scheme by independent third party	● ●
34. Independent audit of subsidiaries and partners	● ●
35. Monitoring scheme includes alert system audit	● ●
36. KPIs for at least one subject matter of the law	● ●
37. KPIs for all four subject matters of the law	● ●
42. Human rights violations published	● ●

**Transparency** 3/11 (27%)

2. Vigilance plan readily accessible within website	● ●
3. Vigilance plan mentions the Devoir de Vigilance law	● ●
16. Forms of discrimination specified in risk mapping	● ●
17. Discriminated groups specified in risk mapping	● ●
20. Specific location of risks provided	● ●
22. Frequency of risk mapping update stated	● ●
23. Frequency of vigilance plan update stated	● ●
30. Alert system managed by a third party	● ●
31. Alert system outcomes published	● ●
38. KPIs used to report on due diligence outcomes	● ●
41. Lessons learned in first year reported in detail	● ●

Combined score: 20/42 (48%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Onet SA**

 Total Revenue (million EUR): NA    Total Assets (million EUR): 3,200    **Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    4/18 (22%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    1/13 (8%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    2/11 (18%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 7/42 (17%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Orange SA**

Total Revenue (million EUR): 96,592    Total Assets (million EUR): 41,381

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    14/18 (78%)

1. Vigilance plan established	● ●
4. Stakeholder input in vigilance plan	● ●
6. Risk mapping and analysis undertaken	● ●
9. Risk mapping in the perspective of potential victims	● ●
10. Risk prioritization within risk mapping	● ●
11. Discussion of suppliers within risk mapping	● ●
12. Discussion of subcontractors within risk mapping	● ●
13. Discussion of subsidiaries within risk mapping	● ●
14. Discussion of labor rights within risk mapping	● ●
18. Discussion of environmental harm in risk mapping	● ●
19. Environmental rights or harms at issue specified	● ●
21. Partner / subsidiary risk assessment procedure	● ●
24. Affirmative steps to address negative impacts	● ●
28. Structure for an alert mechanism included	● ●
29. Specify of what the alert system entails	● ●
32. Monitoring scheme to review action efficacy	● ●
39. Vigilance plan within the management report	● ●
40. Compte rendu or discussion of findings published	● ●

**Conformance with the UN Guiding Principles**    4/13 (31%)

5. Local community input in vigilance plan	● ●
7. Stakeholder input in risk map	● ●
8. Local community input in risk map	● ●

15. Discussion of nondiscrimination within risk map	● ●
25. Office tasked with implementing mitigating action	● ●
26. Office requires upper management sign off	● ●
27. Follow up process to embed mitigation steps	● ●
33. Monitoring scheme by independent third party	● ●
34. Independent audit of subsidiaries and partners	● ●
35. Monitoring scheme includes alert system audit	● ●
36. KPIs for at least one subject matter of the law	● ●
37. KPIs for all four subject matters of the law	● ●
42. Human rights violations published	● ●

**Transparency**    4/11 (36%)

2. Vigilance plan readily accessible within website	● ●
3. Vigilance plan mentions the Devoir de Vigilance law	● ●
16. Forms of discrimination specified in risk mapping	● ●
17. Discriminated groups specified in risk mapping	● ●
20. Specific location of risks provided	● ●
22. Frequency of risk mapping update stated	● ●
23. Frequency of vigilance plan update stated	● ●
30. Alert system managed by a third party	● ●
31. Alert system outcomes published	● ●
38. KPIs used to report on due diligence outcomes	● ●
41. Lessons learned in first year reported in detail	● ●

Combined score: 22/42 (52%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Orano SA**

Total Revenue (million EUR): 22,540

Total Assets (million EUR): 3,623

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law** 14/18 (78%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles** 4/13 (31%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency** 5/11 (45%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 23/42 (55%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Orpea SA**

Total Revenue (million EUR): 11,145

Total Assets (million EUR): 3,420

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law** 13/18 (72%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles** 4/13 (31%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency** 3/11 (27%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 20/42 (48%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Pernod Ricard SA**

Total Revenue (million EUR): 29,558

Total Assets (million EUR): 9,182

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law** 10/18 (56%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles** 2/13 (15%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency** 4/11 (36%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 16/42 (38%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Pierre & Vacances SA**

Total Revenue (million EUR): 1,489

Total Assets (million EUR): 1,595

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law** 13/18 (72%)

1. Vigilance plan established	● ●
4. Stakeholder input in vigilance plan	● ●
6. Risk mapping and analysis undertaken	● ●
9. Risk mapping in the perspective of potential victims	● ●
10. Risk prioritization within risk mapping	● ●
11. Discussion of suppliers within risk mapping	● ●
12. Discussion of subcontractors within risk mapping	● ●
13. Discussion of subsidiaries within risk mapping	● ●
14. Discussion of labor rights within risk mapping	● ●
18. Discussion of environmental harm in risk mapping	● ●
19. Environmental rights or harms at issue specified	● ●
21. Partner / subsidiary risk assessment procedure	● ●
24. Affirmative steps to address negative impacts	● ●
28. Structure for an alert mechanism included	● ●
29. Specify of what the alert system entails	● ●
32. Monitoring scheme to review action efficacy	● ●
39. Vigilance plan within the management report	● ●
40. Compte rendu or discussion of findings published	● ●

**Conformance with the UN Guiding Principles** 2/13 (15%)

5. Local community input in vigilance plan	● ●
7. Stakeholder input in risk map	● ●
8. Local community input in risk map	● ●

15. Discussion of nondiscrimination within risk map	● ●
25. Office tasked with implementing mitigating action	● ●
26. Office requires upper management sign off	● ●
27. Follow up process to embed mitigation steps	● ●
33. Monitoring scheme by independent third party	● ●
34. Independent audit of subsidiaries and partners	● ●
35. Monitoring scheme includes alert system audit	● ●
36. KPIs for at least one subject matter of the law	● ●
37. KPIs for all four subject matters of the law	● ●
42. Human rights violations published	● ●

**Transparency** 3/11 (27%)

2. Vigilance plan readily accessible within website	● ●
3. Vigilance plan mentions the Devoir de Vigilance law	● ●
16. Forms of discrimination specified in risk mapping	● ●
17. Discriminated groups specified in risk mapping	● ●
20. Specific location of risks provided	● ●
22. Frequency of risk mapping update stated	● ●
23. Frequency of vigilance plan update stated	● ●
30. Alert system managed by a third party	● ●
31. Alert system outcomes published	● ●
38. KPIs used to report on due diligence outcomes	● ●
41. Lessons learned in first year reported in detail	● ●

Combined score: 18/42 (43%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Plastic Omnium SA**

Total Revenue (million EUR): 6,779

Total Assets (million EUR): 8,244

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law** 13/18 (72%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles** 4/13 (31%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency** 4/11 (36%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 21/42 (50%)



## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**PSA Automobiles SA**

Total Revenue (million EUR): 58,565    Total Assets (million EUR): 74,027

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    15/18 (83%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    4/13 (31%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    4/11 (36%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 23/42 (55%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Publicis Groupe SA**

Total Revenue (million EUR): 27,080    Total Assets (million EUR): 9,951

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    7/18 (39%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    3/13 (23%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    3/11 (27%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 13/42 (31%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Rallye SA**

Total Revenue (million EUR): 39,169    Total Assets (million EUR): 38,029

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    6/18 (33%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    0/13 (0%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    2/11 (18%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 8/42 (19%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Régie Autonome des Transports Parisiens SA**

Total Revenue (million EUR): 15,166    Total Assets (million EUR): 5,994

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    5/18 (28%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    2/13 (15%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    3/11 (27%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 10/42 (24%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Renault SA**

Total Revenue (million EUR): 114,996

Total Assets (million EUR): 57,419

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law** 14/18 (78%)

1. Vigilance plan established	● ●
4. Stakeholder input in vigilance plan	● ●
6. Risk mapping and analysis undertaken	● ●
9. Risk mapping in the perspective of potential victims	● ●
10. Risk prioritization within risk mapping	● ●
11. Discussion of suppliers within risk mapping	● ●
12. Discussion of subcontractors within risk mapping	● ●
13. Discussion of subsidiaries within risk mapping	● ●
14. Discussion of labor rights within risk mapping	● ●
18. Discussion of environmental harm in risk mapping	● ●
19. Environmental rights or harms at issue specified	● ●
21. Partner / subsidiary risk assessment procedure	● ●
24. Affirmative steps to address negative impacts	● ●
28. Structure for an alert mechanism included	● ●
29. Specify of what the alert system entails	● ●
32. Monitoring scheme to review action efficacy	● ●
39. Vigilance plan within the management report	● ●
40. Compte rendu or discussion of findings published	● ●

**Conformance with the UN Guiding Principles** 4/13 (31%)

5. Local community input in vigilance plan	● ●
7. Stakeholder input in risk map	● ●
8. Local community input in risk map	● ●

15. Discussion of nondiscrimination within risk map	● ●
25. Office tasked with implementing mitigating action	● ●
26. Office requires upper management sign off	● ●
27. Follow up process to embed mitigation steps	● ●
33. Monitoring scheme by independent third party	● ●
34. Independent audit of subsidiaries and partners	● ●
35. Monitoring scheme includes alert system audit	● ●
36. KPIs for at least one subject matter of the law	● ●
37. KPIs for all four subject matters of the law	● ●
42. Human rights violations published	● ●

**Transparency** 6/11 (55%)

2. Vigilance plan readily accessible within website	● ●
3. Vigilance plan mentions the Devoir de Vigilance law	● ●
16. Forms of discrimination specified in risk mapping	● ●
17. Discriminated groups specified in risk mapping	● ●
20. Specific location of risks provided	● ●
22. Frequency of risk mapping update stated	● ●
23. Frequency of vigilance plan update stated	● ●
30. Alert system managed by a third party	● ●
31. Alert system outcomes published	● ●
38. KPIs used to report on due diligence outcomes	● ●
41. Lessons learned in first year reported in detail	● ●

Combined score: 24/42 (57%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Rexel Electrical Supply & Services Holding Limited**

Total Revenue (million EUR): 10,205    Total Assets (million EUR): 13,366

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    15/18 (83%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    7/13 (54%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    6/11 (55%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 28/42 (67%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**RTE Réseau de Transport d’électricité SA**

Total Revenue (million EUR): 20,560    Total Assets (million EUR): 4,817

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    12/18 (67%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    3/13 (23%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    5/11 (45%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 20/42 (48%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Safran SA**

Total Revenue (million EUR): 24,959    Total Assets (million EUR): 21,025

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    10/18 (56%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    4/13 (31%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    3/11 (27%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 17/42 (40%)



## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Sanofi SA**

Total Revenue (million EUR): 111,408

Total Assets (million EUR): 34,463

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law** 15/18 (83%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles** 6/13 (46%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency** 7/11 (64%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 28/42 (67%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Savencia SA**

Total Revenue (million EUR): 3,659

Total Assets (million EUR): 4,863

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law** 13/18 (72%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles** 3/13 (23%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency** 4/11 (36%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 20/42 (48%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Schneider Electric SE**

Total Revenue (million EUR): 42,259    Total Assets (million EUR): 25,720

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    12/18 (67%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    3/13 (23%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    3/11 (27%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 18/42 (43%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**SEB SA**

 Total Revenue (million EUR): 7,077    Total Assets (million EUR): 6,812    **Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    15/18 (83%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    6/13 (46%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    7/11 (64%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 28/42 (67%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Société Bic SA**

Total Revenue (million EUR): 2,407

Total Assets (million EUR): 1,950

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law** 13/18 (72%)

1. Vigilance plan established	● ●
4. Stakeholder input in vigilance plan	● ●
6. Risk mapping and analysis undertaken	● ●
9. Risk mapping in the perspective of potential victims	● ●
10. Risk prioritization within risk mapping	● ●
11. Discussion of suppliers within risk mapping	● ●
12. Discussion of subcontractors within risk mapping	● ●
13. Discussion of subsidiaries within risk mapping	● ●
14. Discussion of labor rights within risk mapping	● ●
18. Discussion of environmental harm in risk mapping	● ●
19. Environmental rights or harms at issue specified	● ●
21. Partner / subsidiary risk assessment procedure	● ●
24. Affirmative steps to address negative impacts	● ●
28. Structure for an alert mechanism included	● ●
29. Specify of what the alert system entails	● ●
32. Monitoring scheme to review action efficacy	● ●
39. Vigilance plan within the management report	● ●
40. Compte rendu or discussion of findings published	● ●

**Conformance with the UN Guiding Principles** 4/13 (31%)

5. Local community input in vigilance plan	● ●
7. Stakeholder input in risk map	● ●
8. Local community input in risk map	● ●

15. Discussion of nondiscrimination within risk map	● ●
25. Office tasked with implementing mitigating action	● ●
26. Office requires upper management sign off	● ●
27. Follow up process to embed mitigation steps	● ●
33. Monitoring scheme by independent third party	● ●
34. Independent audit of subsidiaries and partners	● ●
35. Monitoring scheme includes alert system audit	● ●
36. KPIs for at least one subject matter of the law	● ●
37. KPIs for all four subject matters of the law	● ●
42. Human rights violations published	● ●

**Transparency** 3/11 (27%)

2. Vigilance plan readily accessible within website	● ●
3. Vigilance plan mentions the Devoir de Vigilance law	● ●
16. Forms of discrimination specified in risk mapping	● ●
17. Discriminated groups specified in risk mapping	● ●
20. Specific location of risks provided	● ●
22. Frequency of risk mapping update stated	● ●
23. Frequency of vigilance plan update stated	● ●
30. Alert system managed by a third party	● ●
31. Alert system outcomes published	● ●
38. KPIs used to report on due diligence outcomes	● ●
41. Lessons learned in first year reported in detail	● ●

Combined score: 20/42 (48%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Société Générale SA**

Total Revenue (million EUR): 1,275,128    Total Assets (million EUR): 23,954

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    11/18 (61%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    3/13 (23%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    4/11 (36%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 18/42 (43%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Sodexo SA**

Total Revenue (million EUR): 15,280    Total Assets (million EUR): 20,407

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    14/18 (78%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    3/13 (23%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    3/11 (27%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 20/42 (48%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**SOMDIAA SA (Société d’Organisation de Management et de Développement des Industries Alimentaires et Agricoles)**

 Total Revenue (million EUR): 400    Total Assets (million EUR): 457    **Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    0/18 (0%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    0/13 (0%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    0/11 (0%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 0/42 (0%)



## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Sopra Steria Group SA**

Total Revenue (million EUR): 3,988

Total Assets (million EUR): 4,095

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law** 7/18 (39%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles** 5/13 (38%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency** 2/11 (18%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 14/42 (33%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Spie Batignolles SA**

Total Revenue (million EUR): 7,790

Total Assets (million EUR): 14,194

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law** 12/18 (67%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles** 2/13 (15%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency** 4/11 (36%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 18/42 (43%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**ST microelectronics SA**

Total Revenue (million EUR): 10,867    Total Assets (million EUR): 10,512

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    15/18 (83%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    7/13 (54%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    7/11 (64%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 29/42 (69%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Stahl GmbH**

 Total Revenue (million EUR): 984    Total Assets (million EUR): 867    **Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    13/18 (72%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    4/13 (31%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    5/11 (45%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 22/42 (52%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**STEF SA**

Total Revenue (million EUR): 2,324

Total Assets (million EUR): 3,255

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law** 15/18 (83%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles** 3/13 (23%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency** 2/11 (18%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 20/42 (48%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Suez Water Technologies and Solutions SA**

Total Revenue (million EUR): 33,553    Total Assets (million EUR): 17,331

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    14/18 (78%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    2/13 (15%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    4/11 (36%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 20/42 (48%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Tarkett SA**

Total Revenue (million EUR): 2,390

Total Assets (million EUR): 2,836

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law** 12/18 (67%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles** 6/13 (46%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency** 5/11 (45%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 23/42 (55%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Technicolor SA**

Total Revenue (million EUR): 3,759

Total Assets (million EUR): 3,988

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law** 15/18 (83%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles** 3/13 (23%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency** 4/11 (36%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 22/42 (52%)



## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Teleperformance SE**

Total Revenue (million EUR): 5,888

Total Assets (million EUR): 4,441

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law** 13/18 (72%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles** 4/13 (31%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency** 3/11 (27%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 20/42 (48%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Thales SA**

Total Revenue (million EUR): 25,506    Total Assets (million EUR): 15,855

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    14/18 (78%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    2/13 (15%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    7/11 (64%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 23/42 (55%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Total SA**

Total Revenue (million EUR): 233,653    Total Assets (million EUR): 167,536

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    15/18 (83%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    8/13 (62%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    6/11 (55%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 29/42 (69%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Transdev Group SA**

Total Revenue (million EUR): 4,372

Total Assets (million EUR): 6,892

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law** 15/18 (83%)

1. Vigilance plan established	● ●
4. Stakeholder input in vigilance plan	● ●
6. Risk mapping and analysis undertaken	● ●
9. Risk mapping in the perspective of potential victims	● ●
10. Risk prioritization within risk mapping	● ●
11. Discussion of suppliers within risk mapping	● ●
12. Discussion of subcontractors within risk mapping	● ●
13. Discussion of subsidiaries within risk mapping	● ●
14. Discussion of labor rights within risk mapping	● ●
18. Discussion of environmental harm in risk mapping	● ●
19. Environmental rights or harms at issue specified	● ●
21. Partner / subsidiary risk assessment procedure	● ●
24. Affirmative steps to address negative impacts	● ●
28. Structure for an alert mechanism included	● ●
29. Specify of what the alert system entails	● ●
32. Monitoring scheme to review action efficacy	● ●
39. Vigilance plan within the management report	● ●
40. Compte rendu or discussion of findings published	● ●

**Conformance with the UN Guiding Principles** 4/13 (31%)

5. Local community input in vigilance plan	● ●
7. Stakeholder input in risk map	● ●
8. Local community input in risk map	● ●

15. Discussion of nondiscrimination within risk map	● ●
25. Office tasked with implementing mitigating action	● ●
26. Office requires upper management sign off	● ●
27. Follow up process to embed mitigation steps	● ●
33. Monitoring scheme by independent third party	● ●
34. Independent audit of subsidiaries and partners	● ●
35. Monitoring scheme includes alert system audit	● ●
36. KPIs for at least one subject matter of the law	● ●
37. KPIs for all four subject matters of the law	● ●
42. Human rights violations published	● ●

**Transparency** 3/11 (27%)

2. Vigilance plan readily accessible within website	● ●
3. Vigilance plan mentions the Devoir de Vigilance law	● ●
16. Forms of discrimination specified in risk mapping	● ●
17. Discriminated groups specified in risk mapping	● ●
20. Specific location of risks provided	● ●
22. Frequency of risk mapping update stated	● ●
23. Frequency of vigilance plan update stated	● ●
30. Alert system managed by a third party	● ●
31. Alert system outcomes published	● ●
38. KPIs used to report on due diligence outcomes	● ●
41. Lessons learned in first year reported in detail	● ●

Combined score: 22/42 (52%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Tsebo Solutions Group Proprietary Limited**

 Total Revenue (million EUR): 426    Total Assets (million EUR): 618    **Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    14/18 (78%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    3/13 (23%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    4/11 (36%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 21/42 (50%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Ubisoft Entertainment SA**

Total Revenue (million EUR): 2,805

Total Assets (million EUR): 1,732

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law** 11/18 (61%)

1. Vigilance plan established	● ●
4. Stakeholder input in vigilance plan	● ●
6. Risk mapping and analysis undertaken	● ●
9. Risk mapping in the perspective of potential victims	● ●
10. Risk prioritization within risk mapping	● ●
11. Discussion of suppliers within risk mapping	● ●
12. Discussion of subcontractors within risk mapping	● ●
13. Discussion of subsidiaries within risk mapping	● ●
14. Discussion of labor rights within risk mapping	● ●
18. Discussion of environmental harm in risk mapping	● ●
19. Environmental rights or harms at issue specified	● ●
21. Partner / subsidiary risk assessment procedure	● ●
24. Affirmative steps to address negative impacts	● ●
28. Structure for an alert mechanism included	● ●
29. Specify of what the alert system entails	● ●
32. Monitoring scheme to review action efficacy	● ●
39. Vigilance plan within the management report	● ●
40. Compte rendu or discussion of findings published	● ●

**Conformance with the UN Guiding Principles** 3/13 (23%)

5. Local community input in vigilance plan	● ●
7. Stakeholder input in risk map	● ●
8. Local community input in risk map	● ●

15. Discussion of nondiscrimination within risk map	● ●
25. Office tasked with implementing mitigating action	● ●
26. Office requires upper management sign off	● ●
27. Follow up process to embed mitigation steps	● ●
33. Monitoring scheme by independent third party	● ●
34. Independent audit of subsidiaries and partners	● ●
35. Monitoring scheme includes alert system audit	● ●
36. KPIs for at least one subject matter of the law	● ●
37. KPIs for all four subject matters of the law	● ●
42. Human rights violations published	● ●

**Transparency** 4/11 (36%)

2. Vigilance plan readily accessible within website	● ●
3. Vigilance plan mentions the Devoir de Vigilance law	● ●
16. Forms of discrimination specified in risk mapping	● ●
17. Discriminated groups specified in risk mapping	● ●
20. Specific location of risks provided	● ●
22. Frequency of risk mapping update stated	● ●
23. Frequency of vigilance plan update stated	● ●
30. Alert system managed by a third party	● ●
31. Alert system outcomes published	● ●
38. KPIs used to report on due diligence outcomes	● ●
41. Lessons learned in first year reported in detail	● ●

Combined score: 18/42 (43%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Unibel SA**

Total Revenue (million EUR): 3,928

Total Assets (million EUR): 3,312

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law** 10/18 (56%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles** 2/13 (15%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency** 3/11 (27%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 15/42 (36%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Valeo SA**

Total Revenue (million EUR): 18,472    Total Assets (million EUR): 19,100

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    14/18 (78%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    5/13 (38%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    6/11 (55%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 25/42 (60%)



## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Vallourec SA**

 Total Revenue (million EUR): 6,413    Total Assets (million EUR): 3,921    **Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    15/18 (83%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    2/13 (15%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    5/11 (45%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 22/42 (52%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Veolia Environnement SA**

Total Revenue (million EUR): 37,593    Total Assets (million EUR): 25,911

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    7/18 (39%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    3/13 (23%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    2/11 (18%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 12/42 (29%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Vinci SA**

Total Revenue (million EUR): 75,357    Total Assets (million EUR): 43,500

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    16/18 (89%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    8/13 (62%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    7/11 (64%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 31/42 (74%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Vivarte SAS**

 Total Revenue (million EUR): NA    Total Assets (million EUR): 1,400    **Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    11/18 (61%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    2/13 (15%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    3/11 (27%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 16/42 (38%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Vivendi SA**

Total Revenue (million EUR): 34,403    Total Assets (million EUR): 13,932

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    8/18 (44%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    1/13 (8%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    3/11 (27%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 12/42 (29%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Wendel SA**

Total Revenue (million EUR): 14,317    Total Assets (million EUR): 984

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law**    4/18 (22%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles**    2/13 (15%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency**    2/11 (18%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 8/42 (19%)

## “Devoir de Vigilance: Reforming Corporate Risk Engagement”

 Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

**Worldline SA**

Total Revenue (million EUR): 6,358

Total Assets (million EUR): 1,720

**Vigilance plan statement**
**Compliance with the Devoir de Vigilance law** 10/18 (56%)

- |   |     |
|---|-----|
| 1. Vigilance plan established                           | ● ● |
| 4. Stakeholder input in vigilance plan                  | ● ● |
| 6. Risk mapping and analysis undertaken                 | ● ● |
| 9. Risk mapping in the perspective of potential victims | ● ● |
| 10. Risk prioritization within risk mapping             | ● ● |
| 11. Discussion of suppliers within risk mapping         | ● ● |
| 12. Discussion of subcontractors within risk mapping    | ● ● |
| 13. Discussion of subsidiaries within risk mapping      | ● ● |
| 14. Discussion of labor rights within risk mapping      | ● ● |
| 18. Discussion of environmental harm in risk mapping    | ● ● |
| 19. Environmental rights or harms at issue specified    | ● ● |
| 21. Partner / subsidiary risk assessment procedure      | ● ● |
| 24. Affirmative steps to address negative impacts       | ● ● |
| 28. Structure for an alert mechanism included           | ● ● |
| 29. Specify of what the alert system entails            | ● ● |
| 32. Monitoring scheme to review action efficacy         | ● ● |
| 39. Vigilance plan within the management report         | ● ● |
| 40. Compte rendu or discussion of findings published    | ● ● |

**Conformance with the UN Guiding Principles** 5/13 (38%)

- |  |     |
|--|-----|
| 5. Local community input in vigilance plan | ● ● |
| 7. Stakeholder input in risk map           | ● ● |
| 8. Local community input in risk map       | ● ● |

- |   |     |
|---|-----|
| 15. Discussion of nondiscrimination within risk map   | ● ● |
| 25. Office tasked with implementing mitigating action | ● ● |
| 26. Office requires upper management sign off         | ● ● |
| 27. Follow up process to embed mitigation steps       | ● ● |
| 33. Monitoring scheme by independent third party      | ● ● |
| 34. Independent audit of subsidiaries and partners    | ● ● |
| 35. Monitoring scheme includes alert system audit     | ● ● |
| 36. KPIs for at least one subject matter of the law   | ● ● |
| 37. KPIs for all four subject matters of the law      | ● ● |
| 42. Human rights violations published                 | ● ● |

**Transparency** 2/11 (18%)

- |  |     |
|--|-----|
| 2. Vigilance plan readily accessible within website    | ● ● |
| 3. Vigilance plan mentions the Devoir de Vigilance law | ● ● |
| 16. Forms of discrimination specified in risk mapping  | ● ● |
| 17. Discriminated groups specified in risk mapping     | ● ● |
| 20. Specific location of risks provided                | ● ● |
| 22. Frequency of risk mapping update stated            | ● ● |
| 23. Frequency of vigilance plan update stated          | ● ● |
| 30. Alert system managed by a third party              | ● ● |
| 31. Alert system outcomes published                    | ● ● |
| 38. KPIs used to report on due diligence outcomes      | ● ● |
| 41. Lessons learned in first year reported in detail   | ● ● |

Combined score: 17/42 (40%)

“Devoir de Vigilance: Reforming Corporate Risk Engagement”

Corporate Compliance with the *Devoir de Vigilance* Law, UNGP Conformance and Transparency in Vigilance Plans published in 2019

## XPO Logistics Europe SADIR

Total Revenue (million EUR): 10,986    Total Assets (million EUR): 15,471

### Vigilance plan statement

#### Compliance with the Devoir de Vigilance law 10/18 (56%)

- 1. Vigilance plan established ● ●
- 4. Stakeholder input in vigilance plan ● ●
- 6. Risk mapping and analysis undertaken ● ●
- 9. Risk mapping in the perspective of potential victims ● ●
- 10. Risk prioritization within risk mapping ● ●
- 11. Discussion of suppliers within risk mapping ● ●
- 12. Discussion of subcontractors within risk mapping ● ●
- 13. Discussion of subsidiaries within risk mapping ● ●
- 14. Discussion of labor rights within risk mapping ● ●
- 18. Discussion of environmental harm in risk mapping ● ●
- 19. Environmental rights or harms at issue specified ● ●
- 21. Partner / subsidiary risk assessment procedure ● ●
- 24. Affirmative steps to address negative impacts ● ●
- 28. Structure for an alert mechanism included ● ●
- 29. Specify of what the alert system entails ● ●
- 32. Monitoring scheme to review action efficacy ● ●
- 39. Vigilance plan within the management report ● ●
- 40. Compte rendu or discussion of findings published ● ●

#### Conformance with the UN Guiding Principles 3/13 (23%)

- 5. Local community input in vigilance plan ● ●
- 7. Stakeholder input in risk map ● ●
- 8. Local community input in risk map ● ●

- 15. Discussion of nondiscrimination within risk map ● ●
- 25. Office tasked with implementing mitigating action ● ●
- 26. Office requires upper management sign off ● ●
- 27. Follow up process to embed mitigation steps ● ●
- 33. Monitoring scheme by independent third party ● ●
- 34. Independent audit of subsidiaries and partners ● ●
- 35. Monitoring scheme includes alert system audit ● ●
- 36. KPIs for at least one subject matter of the law ● ●
- 37. KPIs for all four subject matters of the law ● ●
- 42. Human rights violations published ● ●

#### Transparency 3/11 (27%)

- 2. Vigilance plan readily accessible within website ● ●
- 3. Vigilance plan mentions the Devoir de Vigilance law ● ●
- 16. Forms of discrimination specified in risk mapping ● ●
- 17. Discriminated groups specified in risk mapping ● ●
- 20. Specific location of risks provided ● ●
- 22. Frequency of risk mapping update stated ● ●
- 23. Frequency of vigilance plan update stated ● ●
- 30. Alert system managed by a third party ● ●
- 31. Alert system outcomes published ● ●
- 38. KPIs used to report on due diligence outcomes ● ●
- 41. Lessons learned in first year reported in detail ● ●

Combined score: 16/42 (38%)