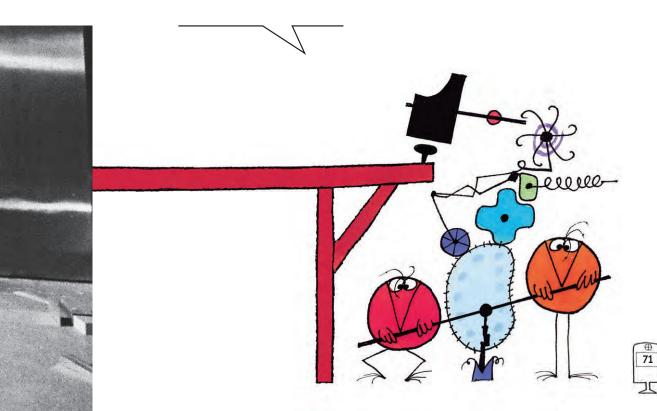
# CORPORATE Social Responsibility (CSR)

WHY KEEP IT SIMPLE WHEN IT CAN BE MADE COMPLICATED?



2017 Registration Document | RUBIS

# **OVERVIEW** OF THE RUBIS CSR POLICY

Although it has developed an international dimension, Rubis remains a human-scale company. It has a decentralized structure, as well as professional and experienced employees who enjoy broad independence and assume in full the responsibilities their roles entail, including risk management.

## **RUBIS' VALUES**

In keeping with its motto: "The will to undertake, the corporate commitment", Rubis puts people at the heart of its organization. Empowering the individual women and men who contribute to its activities means promoting freedom of initiative as well as the ethical, social and environmental values that Rubis wishes to see respected by everyone, everywhere. These requirements safeguard against any wrongdoing that could be harmful to the Group, to employees, to business relations or to any other external public or private operator, and reflect the following principles:

- compliance with current legislation and regulations;
- rejection of all forms of corruption;
- responsible management of environmental resources;
- respect for individuals and compliance with competition rules;
- prevention of conflicts of interest and insider trading.

Details of these values are provided in the **Rubis Group Code of Ethics**; awarenessraising initiatives and control procedures are deployed to ensure that values are applied correctly in the field (see section 5.3.1).

In the countries where it operates, the Group aims to act with professionalism and integrity.

## **NON-FINANCIAL OBJECTIVES INTEGRATED INTO THE GROUP'S STRATEGY**

Rubis' development strategy is based on unique market positioning, a robust financial structure and a dynamic acquisition policy. However it also incorporates non-financial objectives that allow the Group to pursue sustainable growth, in addition to these commercial and financial aspects. The regularity of the teams' performance stems from a corporate culture that values the spirit of entrepreneurship, flexibility, accountability and the embracing of socially responsible conduct.

# AN INVOLVED MANAGEMENT, AWARE OF ETHICAL, SOCIAL AND ENVIRONMENTAL RISKS

The CSR policy implemented by the subsidiaries is overseen by Rubis' Top Management. A portion of the Top Managers' variable compensation is linked to ethical, social and environmental criteria, which are also included in guidelines for Senior Managers of subsidiaries (see chapter 6, section 6.5.1.2).

Rubis' Top Management draws up policy guidelines and monitors both their relevance and their effectiveness.

The CSR policy is then implemented jointly by the Group's functional departments (legal, compliance, accounting, finance, operations, HSE, etc.). These departments have local contacts in each area of business.

Lastly, the Rubis Accounts and Risk Monitoring Committee monitors the analysis of the Group's ethical, social and environmental risks, as well as the corrective measures taken to prevent such risks (see chapter 6, section 6.4.2.1).

# THE RISK MATERIALITY ANALYSIS IDENTIFIED 3 PRIORITIES: HEALTH, SAFETY AND THE ENVIRONMENT

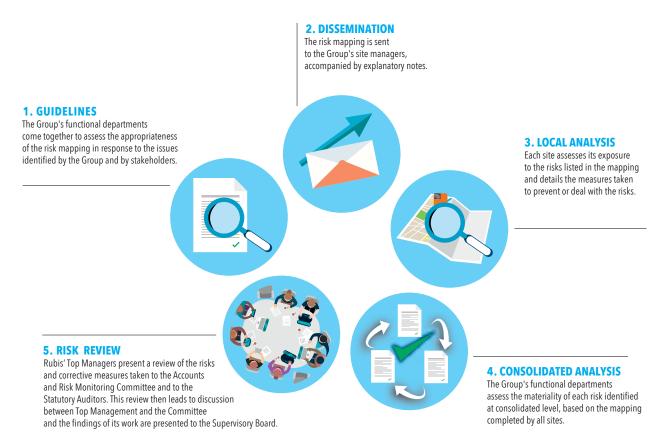
Three main social and environmental challenges have been identified for the Group and its stakeholders: protecting the health and safety of people working on site and local residents alike, and reducing the environmental impact of the most polluting activities.

The Group assesses the materiality of ethical, social and environmental risks as part of a

process of identifying and addressing the risks associated with each of its businesses (see chapter 4).

**Risk maps** have been compiled by the Group's functional departments. They are completed locally, analyzed at consolidated level, then sent to Rubis' Top Managers and presented to the Accounts and Risk Monitoring Committee. Risk mapping is reviewed annually in line with changes in the Group's businesses and locations, as well in as response to observations shared by employees, stakeholders and the Accounts and Risk Monitoring Committee. This process is part of a **co-construction approach** aimed at achieving a shared diagnosis.

#### STAGES OF THE ANNUAL RISK MATERIALITY ANALYSIS



## **A RISK PREVENTION POLICY SPECIFIC TO THE GROUP'S ACTIVITIES**

The Group implements procedures specially designed to deal with the issues identified by the annual risk materiality analysis.

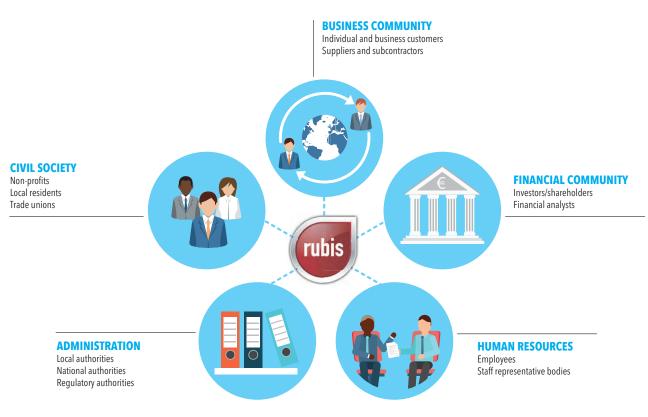
Health and safety risks for individuals operating on the sites as well as for

local residents, and risks relating to the environmental impact of the most polluting activities, are subject to enhanced preventive measures, implemented under major investment programs (see section 5.2). Other issues, such as ethical and corruption risks, are also subject to specific policies and procedures drawn up as part of the continuous improvement process (see section 5.3).



## **REGULAR DIALOG WITH STAKEHOLDERS, STRUCTURED SOCIETAL INITIATIVES**

#### **RUBIS' MAJOR STAKEHOLDERS**



Committed to local populations, the Group values the dialog with stakeholders and its role in promoting dynamic activity in the regions where it operates, as much at the economic and employment levels as in the area of "living together". Dialog with stakeholders takes place, depending on the capacity or mission of said stakeholders, at local level, at the level of entire business divisions or directly with the parent company (see section 5.3.2). Rubis also engages in an active and targeted sponsorship policy, via its endowment fund, **Rubis Mécénat**, and through its subsidiaries' local initiatives. Most of its initiatives are focused on health, culture and education (see section 5.3.2.3).

## **COMPARABILITY, RELIABILITY AND CONTROL OF CSR INFORMATION**

The comparability and reliability of information stem primarily from the standardization of methods used for reporting detailed employee-related and environmental data, as described in the **methodological note** (see section 5.4).

Each standardized definition was the subject of analysis and internal discussion by the Group's functional departments.

The information reported is checked as part of verification procedures and analyses. Internal audits relating to certain nonfinancial information (ethics, anti-corruption) are also being rolled out.

To facilitate the reading of this chapter, a **cross-reference** table with the provisions of the French Commercial Code is provided in section 5.4.1.

# 5.1 Employee relations

The Rubis Group's economic performance is rooted in the skills and motivation of its employees. This motivation entails each individual having the opportunity for professional development. To make the most of its human capital and better handle the specializations involved in the Group's different businesses, Rubis has chosen to adopt a very decentralized operating structure. Operating subsidiaries manage human resources independently, in accordance with the Group's values.

Knowing that any organization can be improved – even the most attentive and the most responsive – Rubis has opted to focus its thinking and efforts and prioritize the issues of workplace health and safety.

## 5.1.1 EMPLOYMENT/HEADCOUNT

The Group's headcount increased sharply between 2016 and 2017 (+26.9%) following the acquisition of petroleum products distribution networks in Haiti (Dinasa) and Madagascar (Galana). There were other changes to the scope of consolidation in 2017, such as the purchase of 50% of Delta Rubis Petrol in Turkey (in which the Group already held a 50% stake), Repsol's distribution assets in Portugal, as well as EG Retail's fuel distribution business in Corsica.

#### TOTAL GROUP HEADCOUNT AS OF DECEMBER 31

2017	2016	Change
3,568	2,812	+26.9%

## 5.1.1.1 BREAKDOWN BY GEOGRAPHIC AREA, BUSINESS LINE AND GENDER

While the storage activity is overwhelmingly located in Europe (excluding the terminal in Turkey), the distribution, and support and services activities are spread between Europe, the Caribbean and Africa.

The table below shows that the rise in the headcount in 2017 was due, for the storage

business, to the purchase of the remaining 50% of Delta Rubis Petrol in Turkey (Rubis Terminal headcount in the "Outside France" region up 37.3%), and for distribution and support and services, to the acquisition of the Dinasa and Galana groups, in the Caribbean (headcount up 43.9%), and Africa (headcount up 36.2%) regions respectively. The 5.3% drop in the number of employees in the Europe region was due to a slight reduction in the number of employees in most of the subsidiaries in question.

The breakdown of the headcount by gender is provided in section 5.1.5.2.

Number of employees	12/31/2017	12/31/2016	Change
Rubis Terminal (storage)	403	361	+11.6%
France	252	251	+0.4%
Outside France	151	110	+37.3%
Rubis Énergie (distribution / support and services)	3,149	2,437	<b>+29.2</b> %
Europe	538	568	-5.3%
Caribbean	1,226	852	+43.9%
Africa	1,385	1,017	+36.2%
Rubis	16	14	+14.3%
TOTAL	3,568	2,812	<b>+26.9</b> %



## 5.1.1.2 JOBS CREATED AND LOST

The Group continued its dynamic recruitment policy in 2017, with net hirings up 93% on the previous year (160 net hirings in 2017, up from 83 in 2016). Net hirings accounted for 21.2% of the increase in the Group's headcount.

The distribution and support and services businesses located in the "Caribbean" reported significant differences in job creations and losses alike between 2016 and 2017. These fluctuations were largely due to a change in the way in which crews of petroleum product transportation vessels were counted within the support and services activity. Since the employees in question were hired for specific, temporary assignments, they could previously be counted several times during a single accounting period under hirings and expirations of fixed-term contracts. In 2017, it was decided that each crew member signing several fixed-term contracts in the same accounting period should only be counted once, so as to improve the pertinence of the job creation and loss data reported by the Group. The increase in the number of dismissals in the region also reflects measures taken locally for managerial reasons and is not the consequence of a planned policy of redundancies.

Lastly, changes in hirings and expirations of fixed-term contracts in the Africa region were primarily associated with the reorganization of Rubis Énergie subsidiaries based in Nigeria.

The deaths reported did not result from accidents at work or occupational illnesses.

	Hirir	ngs	Resign	ations	Retiren	nents	Dismi	ssals	Depar by mu agree	utual	Dea		End of fix contra inclue apprenti	acts, ding
	2017	2016	2017	2016	2017	2016	2017	2016	2017	2016	2017	2016	2017	2016
Rubis Terminal (storage)	39	36	6	7	9	8	11	2	9	5	0	0	5	5
France	19	19	4	6	4	6	6	1	2	4	0	0	5	5
Outside France	20	17	2	1	5	2	5	1	7	1	0	0	0	0
Rubis Énergie (distribution / support and services)	475	588	71	90	20	22	83	112	26	58	6	3	109	228
Europe	92	108	32	36	7	7	21	22	11	29	2	0	11	22
Caribbean	182	252	12	15	7	8	24	3	4	18	3	0	68	188
Africa	201	228	27	39	6	7	38	87	11	11	1	3	30	18
Rubis	2	0	0	0	1	0	0	1	0	0	0	0	0	0
TOTAL	516	624	77	97	30	30	94	115	35	63	6	3	114	233

## 5.1.2 ORGANIZATION OF WORK

The Group strives to ensure the well-being of its employees at work. The diversity of the countries in which the Group operates naturally means that a variety of labor laws are applicable. As such, each concept and/or

criterion used has been given a harmonized definition (see section 5.4).

## 5.1.2.1 WORKING HOURS

The Group's employees mostly work full time: part-time contracts accounted for only 1.4% of employees in 2017, as shown in the table below. Shift work (11% of the headcount) chiefly relates to the organization of work in storage depots and in refining activities. Although the percentage of employees doing shift work has risen only slightly, the number of employees concerned rose by 168.6% in Africa. This very significant hike was largely due to the inclusion of the Galana Group in Madagascar in the scope of consolidation.

	Full	time	Part	time	Of which shift work		
Number of employees as of December 31	2017	2016	2017	2016	2017	2016	
Rubis Terminal (storage)	388	351	15	10	129	136	
France	244	246	8	5	43	49	
Outside France	144	105	7	5	86	87	
Rubis Énergie (distribution / support and services)	3,117	2,403	32	34	264	172	
Europe	517	544	21	24	5	0	
Caribbean	1,221	848	5	4	122	121	
Africa	1,379	1,011	6	6	137	51	
Rubis	13	11	3	3	0	0	
TOTAL	3,518	2,765	50	47	393	308	

## 5.1.2.2 ABSENTEEISM

The rates of absenteeism for accident or non-occupational illness, occupational illness or accidents at work, as well as for unjustified absences, were relatively stable at a very low level across the Group as a whole.

Annual fluctuations were largely due to certain long-term absences, which have a more pronounced impact on the figures of companies with few employees.

#### ABSENTEEISM RATE BY TYPE OF ABSENCE\*

	Absences due to accident or non-occupational illness			e to accidents supational illness	Unjustified absences		
	2017	2016	2017	2016	2017	2016	
Rubis Terminal (storage)	<b>3.19</b> %	4.24%	0.34%	0.61%	0.01%	0%	
France	4.01%	4.64%	0.56%	0.95%	0%	0%	
Outside France	2.16%	3.52%	0.06%	0%	0.02%	0.01%	
Rubis Énergie (distribution / support and services)	<b>1.32</b> %	1.55%	0.07%	0.07%	0.08%	0.07%	
Europe	2.99%	3.28%	0.11%	0.11%	0.18%	0.22%	
Caribbean	1.50%	1.95%	0.09%	0.05%	0.02%	0.03%	
Africa	0.48%	0.36%	0.04%	0.07%	0.09%	0.01%	
Rubis	0.14%	<b>4.01%</b>	0%	0%	0%	0%	
TOTAL	1.55%	<b>1.9</b> 1%	0.10%	0.14%	<b>0.07</b> %	0.06%	

\* Percentage of days missed as a percentage of total working days per annum.

## 5.1.3 EMPLOYEE RELATIONS AND COLLECTIVE BARGAINING AGREEMENTS

Rubis' labor relations are based on listening, dialog and mutual respect for all employees.

Every subsidiary maintains open and constructive relations with staff representative bodies, where they exist (mainly in companies headquartered in France). Collective agreements pertain notably to wages, the company savings plan, incentives, profit-sharing, gender equality and training (see section 5.1.6). Collective agreements are concluded with the aim of achieving positive impacts, in particular on employees' working conditions and the Company's economic performance.

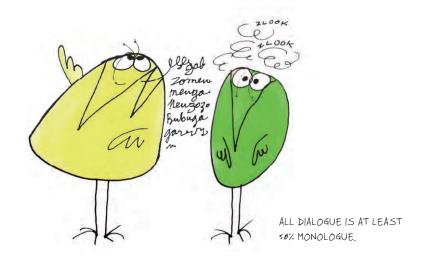
At Rubis Terminal, 74 collective agreements, company agreements or unilateral employer decisions were signed in 2017, covering 302 employees. 42 agreements or unilateral decisions were in place at Rubis Énergie, covering 1,596 employees. No health and safety agreements were signed in 2017.

The number of agreements varies from one period to another depending on

the expiration or renewal dates, as well as in accordance with on any changes in regulations.

In France, all Rubis Énergie and Rubis Terminal employees are covered by a collective agreement. Rubis, the Group's parent company, is not covered by any collective agreement.

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





## 5.1.4 **TRAINING**

The Group places particular importance on employee training and career progression. The number of training hours delivered within the Group totaled 68,899 hours in 2017, up 23.6% on 2016 (55,747). The number of employees trained was up 26.1% (2,133 in 2017, up from 1,692 in 2016), the percentage remaining almost unchanged despite the major acquisitions made by the Group (59.8% of Group employees received training in 2017, compared with 60% in 2016).

Analysis by type of activity showed that the percentage of employees receiving training was higher for the storage activity (84.9% of Rubis Terminal employees) than for the distribution and support and services activities (56.6% of Rubis Énergie employees). This difference was largely due to the nature of the activities performed and the related risks.

Lastly, the table below shows the total number of hours of training delivered and the number of employees receiving training. The number varies significantly from one year to another, as it depends in part on new obligations resulting from changes in national regulations.

	2017		2016	
	Total training hours	Number of employee recipients	Total training hours	Number of employee recipients
Rubis Terminal (storage)	16,418	342	11,505	291
France	4,321	204	2,668	183
Outside France	12,097	138	8,837	108
Rubis Énergie (distribution / support and services)	52,115	1,783	43,947	1,392
Europe	7,140	359	8,105	487
Caribbean	31,919	618	29,799	492
Africa	13,056	806	6,043	413
Rubis	366	8	295	9
TOTAL	68,899	2,133	55,747	1,692

## 5.1.4.1 TRAINING AS A MEANS OF PREVENTING RISK

Given the risks associated with its activities, the Group invests:

- in terms of health, through the provision of "gestures and postures" training for workstations presenting a risk to the health of employees, as well as safety training for different "atrisk" jobs for staff and external workers, product training (welding, handling of chemical products), workplace first aid and rescue, etc.;
- in terms of industrial safety, with the assistance of professional bodies such as the GESIP (Groupe d'Étude et de Sécurité des Industries Pétrolières et Chimiques – Group for Safety Research in the Petroleum and Chemicals Industries). These training courses are designed to continually improve the safety of people and facilities on industrial sites, in an environmentally friendly manner;
- in terms of road safety. To avoid traffic accidents in areas with inadequate road infrastructure and/or poor driver training, some Rubis Énergie subsidiaries have decided to step up defensive driving training programs for their own employees and/or some of their subcontractors;

- in terms of the environment or quality (assimilation of ISO standards);
- in control of systems designed to protect facilities (maintenance of tanks, training in operating fire systems, etc.);
- through partnerships with providers, such as the Association for Prevention in the Transport of Petroleum Products (Association pour la Prévention dans le Transport d'Hydrocarbures – APTH), which provides training and assistance to safety advisers, the Association of Training in the Trading of Fuel (Association de Formation dans le Négoce des Combustibles – Asfoneco), the Red Cross, etc.

In 2017, the Group massively expanded its risk prevention training program, with 85.5% more health and safety training sessions than in 2016. Moreover, the number of management training sessions was up 150.9% over the same period.

	Number of health and	safety training sessions	Number of management training sessions			
	2017	2016	2017	2016		
Rubis Terminal (storage)	154	155	86	48		
France	55	71	6	0		
Outside France	99	84	80	48		
Rubis Énergie (distribution / support and services)	1,150	548	338	121		
Europe	320	330	59	72		
Caribbean	708	152	227	34		
Africa	122	66	52	15		
TOTAL	1,304	703	424	169		

## 5.1.4.2 TRAINING AS A MEANS OF MOVING FORWARD

In accordance with the wishes expressed by employees, the Group invests in more general training to upgrade employees' skills throughout their careers. Rubis Terminal and Rubis Énergie have established a highly varied set of training courses:

- language training;
- management training;
- functional training: training in law, customs, pay systems, reducing the risk of accidents at work and occupational diseases, etc.





## 5.1.5 DIVERSITY AND EQUAL OPPORTUNITY

## 5.1.5.1 PROMOTING CULTURAL DIVERSITY AND COMBATING DISCRIMINATION

Operating in over 30 countries around the world, Rubis is constantly enriched by the cultural diversity of its employees. When acquiring international subsidiaries, Rubis tries to retain and/or hire local employees, for their experience and knowledge of the country. This policy promotes the creation of a more international management body and fosters cultural diversity.

All discrimination linked to ethnic origin, religion, gender or sexual orientation, health and/or disability, political opinions, religious beliefs or family status is prohibited (see section 5.3.1).

## 5.1.5.2 PROMOTING GENDER EQUALITY IN THE WORKPLACE

In an industrial environment where most employees are assigned to operational tasks, with hours and working conditions that can sometimes be difficult, the Group's headcount has historically been dominated by men. However, gender parity has been achieved, or women make up the majority of employees, in certain major subsidiaries. This is the case in the distribution activity in the French Antilles and French Guiana, for instance, where women make up 61% of the headcount.

Company agreements to promote gender equality have also been concluded, in the Group's French subsidiaries, complementing existing measures in the fight against discrimination in hiring and in the promotion of equal compensation, etc.

In the storage activity (Rubis Terminal), a company agreement was renewed in 2017. It focuses on the areas of hiring, training and career development through the use of monitoring indicators. A committee has been formed to monitor measures taken and/or planned.

In the distribution, and support and services activities (Rubis Énergie), a company agreement was renewed in December 2015, aimed notably at facilitating the access of women to positions of responsibility, neutralizing the impact of periods of maternity or adoption leave on professional evaluation, fostering career development and, lastly, promoting measures aimed at ensuring an optimal balance between work and family obligations.

## Representation of women within the Group

The number of women employed by the Group increased by 25% to 818 as of December 31, 2017, up from 654 as of December 31, 2016. Women accounted for 22.9% of the total headcount as of December 31, 2017 (unchanged from 2016) and held 29.7% of the positions of responsibility (executives or Managers).

The number of female employees in the storage business is still relatively low, accounting for 17.1% of the headcount as of December 31, 2017 (up from 16.9% as of December 31, 2016). This low percentage is due to the nature of the positions on offer, in a historically male industry. Female employees were, however, better represented in the category of positions of responsibility (34% of these positions were held by women in 2017). An analysis of categories of positions held by female employees were assigned to positions of responsibility compared with 19.8% of men.

In distribution and support and services activities, the number of female employees was almost unchanged, accounting for 23.4% of the headcount as of December 31, 2017 (compared with 23.9% as of December 31, 2016). They hold 27.8% of the positions of responsibility.

At Rubis, the Group parent company, female employees have historically been in the majority (81.2% of the total Company headcount as of December 31, 2017 compared with 78.6% as of December 31, 2016). They hold 83.3% of the positions of responsibility.

### **CATEGORIES OF POSITIONS HELD IN 2017\***

	Non-execu	tives	Executiv	es	Senior Managers		
	Men	Women	Men	Women	Men	Women	
Rubis Terminal (storage)	268	35	36	24	31	10	
France	170	31	19	9	15	8	
Outside France	98	4	17	15	16	2	
Rubis Énergie (distribution / support and services)	2,011	581	259	118	143	37	
Europe	289	123	48	19	47	12	
Caribbean	817	247	59	32	54	17	
Africa	905	211	152	67	42	8	
Rubis	1	3	1	5	1	5	
TOTAL	2,280	619	296	147	175	52	
Percentage of men and women per category	78.65%	21.35%	66.78%	33.22%	77.04%	22.96%	
Breakdown of the Group's headcount by category	81.25	%	12.40	1%	6.35%		

\* A change in the way in which employee-related data was reported in 2017 means that the data cannot be compared with the 2016 fiscal year. It will be possible to compare these figures from the next Registration Document.

## Hirings

The number of women hired by the Group increased by 7.2% (134 women recruited in 2017, up from 125 in 2016). They accounted for 26% of hirings (up from 20.05% in 2016).

Women only accounted for 13% of hirings in the storage business in 2017 (down from 19.4% in 2016). This proportion is relatively low due to the nature of the positions vacant and the specific features of the labor market by geographic area.

In the distribution and support and services activities, the percentage of women hired improved, rising from 20.1% in 2016 to 26.7% in 2017. Women accounted for more than half of all hires in France (55% in 2017). This percentage was, however, up sharply in the Caribbean, standing at 32.4% of hirings in 2017 (up from 9.9% in 2016). The size of the fluctuation was due to a change in the way in which crews of petroleum product transportation vessels were counted, as shown in section 5.1.1.2. Lastly, the drop in the percentage of women hired in Africa (17.9% in 2017, down from 24.6% in 2016) was due to the integration of Galana in Madagascar, which hired mostly men in 2017.

		2017		2016			
Hirings	Total	Of which women	% women/ total	Total	Of which women	% women/ total	
Rubis Terminal (storage)	39	5	<b>13</b> %	36	7	<b>19.4%</b>	
France	19	4	21.1%	19	4	21.1%	
Outside France	20	1	5.1%	17	3	17.6%	
Rubis Énergie (distribution / support and services)	475	127	<b>26.7</b> %	588	118	<b>20.1</b> %	
Europe	92	32	34.8%	108	37	34.3%	
Caribbean	182	59	32.4%	252	25	9.9%	
Africa	201	36	17.9%	228	56	24.6%	
Rubis	2	2	100%	0	0	-	
TOTAL	516	134	<b>26</b> %	624	125	20.05%	

## Pay raises

Details of the percentage of female employees receiving pay raises are provided in section 5.1.6.1.





## 5.1.5.3 INTERGENERATIONAL DIVERSITY

between generations.

### Balanced breakdown of employees by age

The age structure shows that the Group The Group is enriched by the diversity of its maintains broad intergenerational diversity employees, and strives to maintain a balance in its headcount, which greatly enhances the experience of its teams.

Each age group is represented in a relatively homogeneous way in 2017, as in 2016.

		12/31	/2017			12/31	/2016	
	Under 30 years	Between 30 and 40 years	Between 40 and 50 years	Over 50 years	Under 30 years	Between 30 and 40 years	Between 40 and 50 years	Over 50 years
Rubis Terminal (storage)	<b>9</b> %	<b>34.9</b> %	33.5%	22.6%	<b>10.1%</b>	33.7%	32.6%	<b>23.6</b> %
France	4.8%	35.3%	33.3%	26.6%	6.4%	34.7%	32.3%	26.7%
Outside France	16.2%	34.1%	33.8%	15.9%	18.7%	31.5%	33.3%	16.4%
Rubis Énergie (distribution / support and services)	<b>12.</b> 1%	<b>33.9</b> %	30.3%	23.7%	<b>12.3</b> %	32.1%	31.4%	<b>24.2</b> %
Europe	11.5%	25.3%	31.2%	32%	12.2%	23.8%	31.3%	32.8%
Caribbean	11.9%	28.5%	33%	26.7%	12.9%	26.2%	34%	26.9%
Africa	12.6%	42%	27.6%	17.8%	11.8%	41.8%	29.3%	17.1%
Rubis	12.5%	37.5%	<b>18.8</b> %	31%	7.1%	35.7%	21.4%	35.7%
TOTAL	<b>11.8</b> %	34%	<b>30.6</b> %	<b>23.6</b> %	<b>12%</b>	32.4%	31.5%	<b>24.1%</b>

## Actions in favor of seniors and young people

To promote knowledge transfer between generations and maintain proximity between younger and older employees, in previous years, in France, Rubis Énergie and Rubis Terminal defined a policy in favor of older workers.

For Rubis Énergie, employing older staff is a key means of promoting cross-generational social cohesion. As such, the Company ensures that the following goals are encouraged:

- career development;
- development of skills and qualifications;
- knowledge transfer.

Rubis Terminal is committed to working on:

- keeping employees aged 55 and over in • the headcount;
- implementing a second-stage career • review for employees aged over 50;
- ergonomic training;
- paying part of the cost of qualifications certifying skills learned through experience (the French validation des acquis de l'expérience program).

For young employees, the Group encourages combined work-study programs, which it sees as a good way of bringing young people into the world of work.

#### 5.1.5.4 DISABILITY

The Group adopts a policy of openness towards disability, funding associations and institutions working in the field of health as part of its sponsorship activities (see section 5.3.2).

Rubis Terminal has also signed partnership agreements with organizations that help disabled people back into work and institutions operating in the sheltered sector. For instance, for more than 20 years, the Rubis Terminal head office has been sourcing office supplies and maintenance products from two businesses employing workers with disabilities under the auspices of the Commission for rights and autonomy of disabled people (CDAPH).

## 5.1.6 OVERALL COMPENSATION LINKED TO PERFORMANCE AND THE LEVEL OF RESPONSIBILITY

While being aware of the need to control wage costs, the Group is committed to paying fair and motivating compensation reflecting the skills of each employee, and the achievement of targets established with the employees to foster their commitment and bolster their performance.

## 5.1.6.1 PAY RAISES

Employees receive a fixed salary as well as additional compensation based on individual performance (variable salary, bonuses). Wages are regularly reviewed based on individual performance and changes in the cost of living.

In 2017, over half of the Group's headcount (58.5%) was granted a pay raise, as in 2016. This percentage was divided equally across categories of positions and employee gender.

#### NUMBER OF EMPLOYEES RECEIVING A PAY RAISE BY CATEGORY IN 2017\*

	Non-exec	utives	Executi	ves	Senior Managers		
	Men	Women	Men	Women	Men	Women	
Rubis Terminal (storage)	217	30	25	3	22	4	
France	162	29	10	3	11	3	
Outside France	55	1	15	0	11	1	
Rubis Énergie (distribution / support and services)	1,103	343	156	81	63	25	
Europe	170	60	23	12	25	8	
Caribbean	258	115	27	11	23	11	
Africa	675	168	106	58	15	6	
Rubis	1	2	1	4	1	5	
NUMBER OF EMPLOYEES RECEIVING A PAY RAISE	1,321	375	182	88	86	34	
Total headcount	2,280	619	296	147	175	52	
Percentage of employees receiving a pay raise in the same population:		· · · · · ·		· · · · · · · · · · · · · · · · · · ·			
• gender	<b>57.9</b> %	<b>60.6</b> %	61.6%	<b>59.9</b> %	<b>49.3</b> %	<b>65.4</b> %	
category	58.5%	%	61%	5	53%		
total headcount			58.59	%			

\* A change in the way in which employee-related data was reported in 2017 means that the data cannot be compared with the 2016 fiscal year. It will be possible to compare these figures from the next Registration Document.

## 51.6.2 SOCIAL SECURITY INSURANCE FOR EMPLOYEES OUTSIDE FRANCE

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

At Rubis Énergie, the provision of private social insurance (provident, healthcare) is at the employer's initiative for employees working outside France, except for those foreign subsidiaries that had implemented such systems prior to their acquisition by the Group.

## 5.1.6.3 PROFIT-SHARING AND INCENTIVE AGREEMENTS

Rubis Énergie and Rubis Terminal have, in accordance with French law, introduced

profit-sharing and incentive agreements. Rubis only has an incentive agreement.

Rubis Terminal and Rubis Énergie employees received incentive and profit-sharing payments in 2017. Employees of Rubis only received incentive payments.

## 5.1.6.4 COMPANY SAVINGS PLANS

Rubis and the Group's French subsidiaries have company savings plans. Rubis has also set up a mutual fund (Rubis Avenir) that invests in Rubis shares, through which employees of the Group's French companies subscribe to annual capital increases. At December 31, 2017, Rubis Avenir held 1.20% of Rubis' share capital.

In 2017, the capital increase reserved for employees was widely subscribed, 68.76% of eligible employees having taken part in this issue (see chapter 7, section 7.3.1).

## 5.1.6.5 INCENTIVE PLANS

The purpose of long-term incentive plans is to acknowledge the positive contribution made by certain high-potential executives and Senior Managers at Rubis' subsidiaries to the implementation of the Group's strategy and to its growth. They are a valuable tool for the human resources management, allowing the Group to attract and retain talents. The plan involve only a small portion of the capital, and are subject to demanding performance conditions. It is important to note that the plans do not benefit Rubis' Top Managers.

The characteristics of these plans and their performance conditions are described in detail in chapter 7, section 7.4.



# *5.2* **HEALTH, SAFETY** AND ENVIRONMENTAL INFORMATION

Protecting people and the environment is an issue for all. For Rubis, it is a priority. As a committed and responsible company, the Group works tirelessly to protect not only its environment, but also that of its employees and customers. Furthermore, the Group devotes part of its efforts and talent to encouraging energy savings.

## 5.2.1 HEALTH, SAFETY AND THE ENVIRONMENT: RUBIS' PRIORITIES

The Group is pursuing compliance with its framework for quality, health, safety and the environment (QHSE). It also seeks to make all possible improvements to working conditions and facilities, in order to prevent and/or reduce accidents in the workplace and the environmental impact of its activities.

## 5.2.1.1 OVERVIEW OF THE QHSE POLICY

The QHSE policy framework, referred to in Rubis' Code of Ethics (see section 5.3.1), states that each employee must act responsibly when performing their duties, comply with the health, safety and environmental protection procedures on site, and pay particular attention to compliance with these rules by third parties (colleagues, suppliers, external service providers, etc.).

# Spreading the Group's fundamental principles among subsidiaries

A QHSE policy has been developed for each of the Group's business lines. It is consistent with the principles enshrined by Rubis in its Code of Ethics.

It is overseen by facility heads, assisted by the Rubis Énergie and Rubis Terminal Industrial, Technical and HSE Departments, and, on the biggest sites, by quality and/or HSE engineers. Directors of subsidiaries and the functional departments report on their work in the field of HSE to Management Committee meetings held twice a year within each subsidiary, in the presence of Rubis' Top Management.

The main aim of these QHSE policies is to put in place the measures required to limit incidents as far as possible and thereby reduce the probability of a severe event occurring. Whether in respect of industrial accident risks or the risk of accidents at work, a higher number of incidents or near misses reflects a higher probability of occurrence of an accident.

## Rubis Terminal (bulk liquid storage)

Rubis Terminal has issued a document to all subsidiaries setting out "the principles of the Rubis Terminal safety culture," and imposing standardized safety rules.

These principles stress, through the commitments made by Rubis Terminal's Management, that Senior Managers are responsible and accountable for the safety of personnel, and note that safety is a core value of the Group to be shared as a personal value by all employees.

Rubis Terminal considers that health and safety contribute to the success of the Company, and should therefore never be neglected, and that action must be taken upstream to avoid workplace injury or occupational illness. The Management of each industrial site therefore has the obligation to ensure regular audits assessing compliance with safety principles and standards. Performance indicators have been set up in order to trigger and monitor a process of continuous improvement in respect of health and safety.

Rubis Terminal's Management and that of each depot make an annual commitment to employees, customers, suppliers, governments and local residents, pledging to apply a QHSE policy which incorporates a safety improvement target. Senior Managers also agree to adhere to recognized international QHSE standards, set out below.

Lastly, Rubis Terminal has embarked upon a multi-year program with detailed targets for reductions in consumption, emissions and discharges, through the distribution of a document entitled "Group objectives in respect of environmental impacts and energy consumption". The document sets out objectives for reducing greenhouse gas emissions, energy and water consumption, and waste production in the years to 2020.

# Rubis Énergie (distribution of petroleum products and support and services activities)

Rubis Énergie has established a Health, Safety and Environment (HSE) Charter, which requires its affiliated companies to comply with HSE objectives considered fundamental, over and above regulations in



force locally, as a means of preserving the safety of assets and people, and to heighten employee awareness on these issues.

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

- spread the Group's fundamental HSE principles among subsidiaries;
- implement the industry's best business and industry practices;
- have documentation systems established in accordance with "quality" standards ensuring reliability and safety of operations;
- regularly assess technological risks;
- strengthen preventive maintenance of facilities;
- regularly inspect the facilities and processes (transportation activities included) and address any discrepancies identified;

- analyze incidents through feedback documents;
- regularly train employees and raise their awareness of technological risks.

### Strictly complying with professional and industry standards

Several actions underpin this objective, depending on the relevant operations:

- take care to analyze the state of the facilities in the light of specific Group standards and local regulations and, if necessary, schedule work to bring them up to standard;
- sign up to initiatives such as the International Council of Chemical Associations' Responsible Care program, under which Rubis Terminal has committed to complying, in its various activities, with the regulations

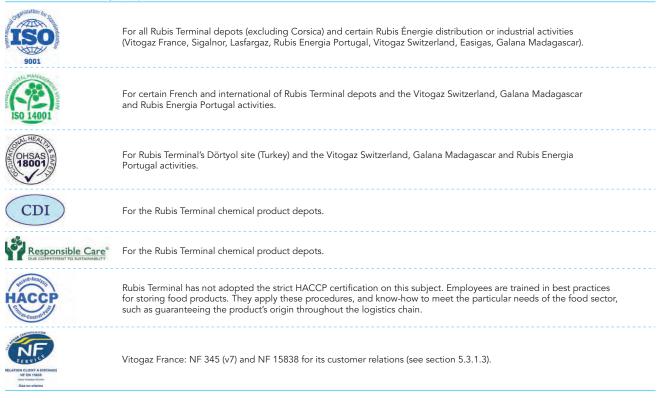
and professional recommendations of the sector, to benchmarking best industrial practices and to seeking continuous improvement in its performances in the areas of safety, protection of health and the environment;

- for chemical product storage depots, join the Chemical Distribution Institute-Terminals (CDI-T), a non-profit foundation working to improve the safety of industrial sites in the chemicals industry;
- join the professional aviation groups/ associations JIG and IATA, with the goal of developing expertise in aircraft fueling operations at airports.
- partner with Oil Spill Response Ltd, a company that can assist in the event of any maritime pollution that may occur during the loading/unloading of products in Rubis Énergie terminals.

## Obtain site certification

The Group has obtained certification for several of its sites including those classified as Seveso facilities:

#### Certifications obtained by Group entities





## Preventing risks in order to better protect integrity of individuals

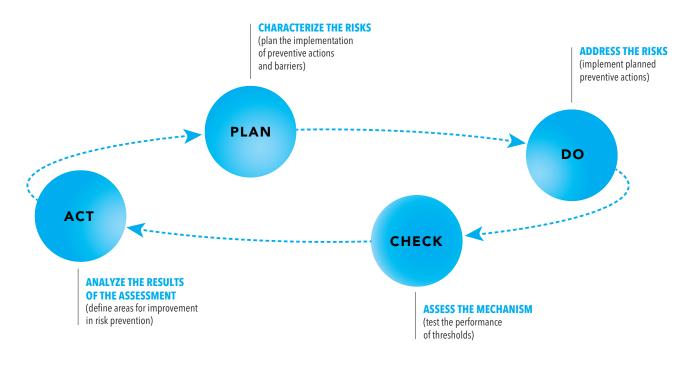
The Group's QHSE teams are committed to a continuous process of improving measures and procedures for the security of property and the safety of people and, in particular, employees.

To anticipate risks, the QHSE teams are required to perform the following work:

- identify significant risks through annual risk mapping by company Managers, assisted by the heads of the distribution activity, the industrial facilities and the shipping business (see chapter 4, section 4.1);
- improve preventive maintenance of facilities and the perception of risks by employees. Rubis Énergie and Rubis Terminal continued to deploy their collaborative software for the preventive maintenance of facilities (computerized maintenance management system). Once the relevant information has been loaded into the database, these systems allow the planning of monitoring and preventive maintenance work. Its other functions are to list all past maintenance operations so as to create a service history, to anticipate spare parts requirements, to assess maintenance costs in connection with the management of equipment, and to prepare budget estimates.

Moreover, to improve the understanding of the systems and the assessment of the risks bearing on Seveso 2 facilities, Rubis Terminal has also developed piping and instrument diagrams (PID). PIDs are a system used to identify the pipes, tanks and pumps of a site digitally, and to harmonize disparate existing blueprints and to replace them with a single reliable plan that can be duplicated on all sites.

Lastly, Rubis Énergie is gradually involving employees in a continuous effort to improve of the facility safety, respecting the rule "Plan – Do – Check – Act" (see diagram below);



 use of feedback procedures. The organizational arrangements of these procedures vary depending on the relevant operations.

**Rubis Terminal** has developed new safety-sharing software (Rubis Terminal Operational Platform) in order to facilitate and encourage the collection and exchange of safety-related information. This interface, designed from a practical angle and adapted to the characteristics of the business, collates incident reports published by each terminal. It comes with a feedback management module, as well as reports and a selection of indicators. It is used by local QHSE teams and promotes interactions between sites in order to limit the repetition of risk events.

**Rubis Énergie** uses the Company's extranet to circulate a documentary

base with, in particular, feedback, to all its subsidiaries. Recommendations can then be made after analyzing accidents. They can include the adaptation of organizational measures, the updating of risk prevention procedures, the strengthening of employee training activities, the modification of facilities or the improvement of the monitoring of equipment; The procedure for reporting near misses, incidents and accidents by subsidiaries, which gives rise to feedback, is an excellent indicator of the safety culture prevailing in the various entities. It is also an important feature of the continuous improvement process;

 prevent and control technological risk: the preventive safety mechanism at facilities. Prevention of technological risks is ensured through regular inspections of the Group's sites and subsidiaries by the Industrial and Technical Departments of Rubis Terminal and Rubis Énergie. They are detailed in reports prepared in consultation with the heads of the relevant facilities and the Managers of the subsidiaries concerned, in order to analyze potential anomalies and/or shortcomings and take steps to remedy them.

In addition to inspections and feedback, each entity implements preventive measures appropriate for its own business, including:

- **internal inspections** of all LPG and fuel bulk storage tanks,
- **safety equipment** such as gauges, level alarms, fire defenses, gas detection systems, etc.,
- routine verification that all substances stored, existing or new, have been covered beforehand by an operating permit if required,
- systematic analysis and management of risks identified in the Material Safety Data Sheet (MSDS) and systematic training of staff in the handling of any potentially hazardous products,
- pursuant to Seveso regulations, a procedure to prevent major accidents on the French facilities involving hazardous substances, supplemented by "Instrumented Risk Control Measures" (IRCMs),

- periodic inspection of fire-fighting systems and regular updating of contingency plans, in consultation with local authorities;
- calling on specialist companies. Rubis Énergie partners with professional bodies such as the GESIP (Groupe d'Étude de Sécurité des Industries Pétrolières - Group for Safety Research in the Petroleum Industries), the Joint Inspection Group (JIG) and the International Air Transport Association (IATA), which provide general operational, training and safety support;
- regularly training staff and raising their awareness (see section 5.1.4).

## Minimizing the impacts of a major incident

The Group operates 43 industrial sites classified as Seveso sites (high and low threshold, including a refinery) in the European Union and their equivalents elsewhere (petroleum or chemical products storage sites and LPG cylinder filling plants). Seveso regulations require rigorous measures to be taken in terms of safety. Should a major event occur despite the implementation of these rigorous preventive measures, the Group has made provision for:

the establishment of a crisis management organization that can be triggered rapidly if there is a major event. For example, the Seveso-type sites in question at Rubis Énergie and Rubis Terminal have emergency response plans that aim to bring incidents under control as quickly as possible, using local resources, to guarantee the best possible protection of goods and persons. These plans are combined with 24/7 on-call crisis management procedures.

In the event of an incident, Managers are alerted. Furthermore, in accordance with national regulations, a system is in place for activating a crisis management unit, depending on the seriousness of the event.

Crisis management units bring together the Managers of the entity in question and any internal experts. Their main role is to disseminate information and communicate both internally, with the operating staff from the establishment in question, or within the Group, or externally, with neighbors, local authorities and the media.

Lastly, some subsidiaries also organize regular training sessions on crisis communications *via* accident simulation exercises, allowing them to test preestablished communications protocols;

 the option to obtain assistance from specialist companies. Rubis Énergie, for example, has partnered with Oil Spill Response Ltd to receive assistance in the event of maritime pollution at its fuel depots.

At Rubis Terminal, the Seveso-type storage sites in question have both internal and external resources to respond to pollution incidents. For example, specialist companies are contacted to manage any river spills that could be carried along by the current.

### **Dedicated investments**

Rubis is aware that investment is key to the Group's competitiveness. It continues to invest regularly to upgrade its facilities to the highest environmental and safety standards, and to guarantee the protection of people and their environment (air, water, soil and urban areas near its facilities).

The amount of investments on safety and environmental maintenance work is stable overall. In 2017, Rubis Terminal and Rubis Énergie invested  $\notin 12.6$  million and  $\notin 30.2$  million respectively in safety and environmental maintenance work, bringing the total to  $\notin 42.8$  million, compared with  $\notin 41$  million in 2016.



## 5.2.1.2 HEALTH AND SAFETY AT WORK

Rubis has implemented a proactive policy on health and safety at work, shown in detail throughout this section. It also focuses on the prevention of accidents at work, the frequency of which is declining, and on the prevention of occupational and nonoccupational illnesses.

#### Accidents at work

Although the number of accidents at work with lost time in excess of one day was up on the previous year (32 in 2017 compared with 27 in 2016), their frequency (per million hours worked) was down (5.3 in 2017 compared with 5.5 in 2016) due to the increase in hours worked, generated primarily by the incorporation of 2 new subsidiaries, Dinasa (Haiti) and Galana (Madagascar) employing a significant number of staff.

In 2017, the Group was unfortunate enough to experience a fatal accident involving one of its employees in Guyana. This was a commuting accident, considered under French legislation, to be an accident at work.

## Accidents at work

	Number of accidents at work with lost time > 1 day				occup	Number of occupational illnesses		Number of accidents at work that caused total and irreversible disability		Number of fatalities	
	2017	2016	2017	2016	2017	2016	2017	2016	2017	2016	
Rubis Terminal (storage)	8	10	10.4	16.4	0	0	0	0	ο	0	
France	8	9	18.1	23.3	0	0	0	0	0	0	
Outside France	0	1	0	2.6	0	0	0	0	0	0	
Rubis Énergie (distribution / support and services)	24	17	4.5	4	3	0	0	1	1	0	
Europe	12	5	13.8	5.3	3	0	0	1	0	0	
• France	5	1	17.1	3.3	0	0	0	1	0	0	
Outside France	7	4	12.1	6.2	3	0	0	0	0	0	
Caribbean	8	5	4	3.6	0	0	0	0	1	0	
Africa	4	7	1.7	3.7	0	0	0	0	0	0	
Rubis	0	0	0	0	0	0	0	0	0	0	
TOTAL	32	27	5.3	5.5	3	0	0	1	1	0	

## **Road safety**

In the area of road safety, the Group is constantly seeking to improve outcomes in terms of road accidents associated with its activities. To avoid traffic accidents in areas with inadequate road infrastructure and/or poor driver training, some Rubis Énergie/Support and Services subsidiaries have decided to step up defensive driving training programs. This was reflected, for example, in a training and improvement plan for employees as well as the scheduling of measures to modernize equipment (vehicle fleet). Some subsidiaries rolled out on-board electronic support (France, Switzerland, Morocco) and tracking systems (Nigeria, Bermuda, Jamaica, South Africa, Madagascar). Lastly, random alcohol and drug testing is also implemented.

### Occupational illness and health

With regard to occupational illnesses, 3 employees experienced musculoskeletal issues associated with their activities. The Group pays close attention to these risks and, for several years now, has offered ergonomic training to employees in at-risk positions.

As regards other health risk factors, exposure measurement campaigns are conducted, notably by the SARA refinery, in particular, in relation to chemical products, noise and vibrations, Legionella and asbestos.

Regarding non-occupational illnesses, the Group is present in some countries experiencing pandemic situations. Recognizing the role that companies can play in preventing such health hazards, a number of subsidiaries have implemented awareness and assistance programs, particularly in the context of the fight against AIDS (South Africa), the Ebola epidemic and malaria (Nigeria), plague (Madagascar), cholera (Haiti) or even chikungunya (Caribbean).

Lastly, private health cover is taken out for employees to enable them to access healthcare (see section 5.1.6.2).

## 5.2.1.3 ENVIRONMENTAL IMPACT OF THE GROUP'S ACTIVITIES

The risks to the environment and to the safety of people stemming from Group activities are monitored closely and managed responsibly. They are described in chapter 4, section 4.1.1.

# 3 divisions with environmental impacts that are not readily comparable

The Group's activities are split into 3 divisions generating environmental impacts that are of different nature and scale: bulk liquid storage (petroleum, chemical and agrifood products), through Rubis Terminal, petroleum products distribution, and support and services including refining, trading and shipping of petroleum products (shipping), through Rubis Énergie/Support and Services.

## Bulk liquid storage: petroleum, chemical and agrifood products

Through Rubis Terminal, the Group stores hazardous liquids, including petroleum and chemical products, as well as agrifood products including molasses and edible oils. Its facilities in Europe are therefore subject to strict regulations, specifically under the Seveso directives (see chapter 4, section 4.1.1). The Group's primary role is to return the products entrusted to it by its customers in the state in which they were received; transportation is the responsibility of the customers. These operations do not involve any industrial processing, thus, air discharges and energy consumption are limited. In addition, new services have also been introduced (blending or dilution of products), to accompany the development of biofuels.

## Distribution of petroleum products

The Group is developing a petroleum products distribution business. Amongst the products distributed, butane and propane (LPG) are gases that produce no particulates when burned. They also significantly limit emissions of both  $CO_2$  (carbon dioxide), a greenhouse gas, and  $NO_x$  (nitrogen oxides), which causes respiratory diseases.

Distribution of fuel (gasoline, diesel, kerosene, fuel oil, etc.), notably through gas stations network and aircraft refueling installations, as well as distribution of bitumen, can be exposed to risks of accidental spillages or leaks of products.

### Support and services activities

The Group trades and ships petroleum products and carries out refining activities.

Shipping is exposed to the risk of maritime pollution. The Rubis Énergie refinery, in the French Antilles, is exposed to risks of accidental product spills or leaks associated with the operation of a major industrial site classed as a high-threshold Seveso site (see sections 5.2.2 *et seq.*).

### Measures limiting the environmental impact of the Group and for a circular economy

Rubis acts to limit as far as possible the environmental impact of its operations and to improve its performance in a circular economy.

The system in place includes:

- risk prevention measures that protect the safety of property and people, (in particular employees), and the environment alike (see section 5.2.1.1);
- measures against water and soil pollution (see section 5.2.2);
- gas emission reduction measures and the promotion of less polluting energy (see section 5.2.3);
- efforts in the management and recovery of waste, in the fight against food waste (see section 5.2.5) and in wastewater treatment (see section 5.2.6.1);
- energy consumption reduction efforts (see section 5.2.6.2).





## 5.2.2 WATER AND SOIL POLLUTION

The risks of contamination of water and soil related to the Group's operations can result from accidental spillages of stored and/ or transported products (see chapter 4, section 4.1). Some of the pollution identified to date results from operations prior to the Group's presence on the site in question; for such pollution, a program to ensure compliance with the Group's standards is being implemented. Broadly speaking, the Group invests significantly and gradually on sites to improve the safety of its facilities and to eliminate the risk of pollution as far as possible.

#### Analysis by business line

Water and soil pollution issues are not the same for all of the Group's businesses.

The petroleum products distribution activity (gas stations and tanks on customers' premises) is essentially only concerned by water and soil pollution from the risk of accidental fuel spills or leaks in the pipeworks or tanks.

In the storage activity, in 2017, the change in the level of suspended solids at Rubis Terminal sites was not significant compared with 2016. The increase in the rate of petroleum products released into water was due to increased operations at a site in Rouen, including draining lines in preparation for the commencement of works, without, however, exceeding regulatory thresholds. Storage activity at Rubis Terminal and Rubis Énergie may generate soil pollution, especially as a result of bulk tank overflows, spillage, bulk tank and/or pipe leaks.

#### Support and services activity (refining)

could also give rise to water and soil pollution in the event of accidental spillage or leaks, as well as through the use of wastewater (desalination water, stripping treatments), bulk tank drain water and ballast waste water. Discharges of suspended solids and petroleum products into water declared by the Rubis Énergie refinery in 2017 were up 8.7% and down 37.8% respectively compared with 2016. Excess discharge of suspended solids was associated with the loss of performance of a lamella clarifier, which will be replaced by more powerful equipment in 2018. The reduction in volumes of petroleum products released into water was due to more reliable units (reduction in quantities of process water to be treated) and an increased abatement in physico-chemical treatment

	Suspended solids released into water (in kg)		Petroleum products released into water (in kg)	
	2017	2016	2017	2016
Storage activity (Rubis Terminal)	1,743	2,160	260	230
Refining activity (Rubis Énergie)	3,854	3,546	218	350

## Measures to prevent and/or contain water and soil pollution

## Petroleum products distribution activity

Equipment used at Rubis Énergie gas stations that is liable to generate soil pollution (mainly tanks and piping) is checked regularly (particularly in respect of its integrity and watertightness), and is gradually being replaced by double-wall technology. This includes double-wall underground tanks and pipes equipped with leak detectors which provide continuous oversight to guard against any possible pollution.

At the same time, Rubis Énergie is strengthening its preventive maintenance programs for this equipment (detailed in section 5.2.1), and is working to improve the safety/environmental training of station managers (see section 5.1.4), to ensure that they have the resources available to

immediately detect any loss of product due to faulty equipment and/or improper practises or fraud.

Rainwater liable to have been polluted through contact with roadways is increasingly being treated before discharge into the environment; stations are equipped with systems for the collection and treatment of rainwater whenever road repair work is planned.

#### Storage activity

Tanks containing hazardous products, and associated pipework, undergo systematic inspections at storage sites in accordance with international standards during regular mandatory on-site visits. Moreover, to prevent groundwater and soil pollution in the event of accidental spillage, nearly all storage tanks are installed in watertight retention basins (lined with concrete or clay compounds). These basins are kept shut. They are only opened manually after checks have been performed confirming the absence of pollutants.

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

#### Support and services activity

For vessel chartering, Rubis Énergie calls on the services of a specialist company that vets the vessel in question. This specialist company collects information relating to the vessel's condition (construction date, maintenance, etc.), as well as the operator's quality (reliability of the crew, etc.). It then submits a recommendation on the risks in using the vessel, which Rubis Énergie relies on before signing the charter agreement.

Rubis Énergie has also taken preventive measures in the event of maritime pollution in its terminals, during product loading/ unloading operations. Rubis Énergie has partnered with Oil Spill Response Ltd, an organization that provides specialized assistance in managing this type of occurrence.

The SARA refinery took part in an antipollution exercise with the port authorities in French Guiana in November 2017, in preparation for managing possible accidents when unloading domestic heating oil at the wharf. In addition, permanent barriers were installed on wharves in Guadeloupe and French Guiana to improve the containment of petroleum products in the event of accidental spillage. Similar initiatives and work are also planned for other Group installations.

## 5.2.3 AIR DISCHARGES

Rubis' activities do not generally generate significant volumes of greenhouse gas emissions, insofar as they do not involve industrial transformation processes, with the exception of the refining activity in the French Antilles.

However, aware that customer use of the fuels it distributes generates greenhouse gas emissions, Rubis Énergie targets initiatives at consumers (see section 5.2.7.2), and will publish quantitative data on this item from 2018.

#### Analysis by business line

The nature and volumes of gas emissions vary according to the Group's activity.

The distribution of petroleum products activity generates some VOC (Volatile

Organic Compounds) emissions, however these emissions remain relatively low.

For LPG distribution, VOCs discharged consist of butane and/or propane released during connection/disconnection operations when filling cylinders and trucks, and during cylinder degassing as required by the technical inspection at the time of periodic checks. Rubis Énergie's French LPG facilities do not exceed the emissions thresholds above which a declaration to the public authorities is required. Other VOCs are made up of the solvents contained in paints used for cylinders. For example, quantities of VOC discharged by the Gonfreville and Portla-Nouvelle facilities in 2017 are estimated at 3.4 and 2 tonnes, respectively.

Automotive fuel distribution, storage and distribution facilities generate VOC emissions from gasoline. These emissions are particularly low due to measures taken to collect gasoline fumes, as described below. In the depots, gasoline bulk tanks are generally equipped with floating covers and truck loading stations are gradually being converted to "source", in gas stations, fumes emitted during unloading and when customers fill up with gasoline are being progressively recovered.

The distribution activity does not emit significant volumes of  $NO_x$  or  $CO_2$ . However, aware that third-party use of the fuels it distributes generates  $CO_2$  emissions, Rubis Énergie takes initiatives to combat greenhouse gas emissions (see section 5.2.7).

In addition to VOC emissions, the **storage activity** generates  $CO_2$  from the steam boilers used to keep certain products hot and, to a lesser extent, from heating premises, testing the fire pump power systems and back-up generators.

In 2017,  $CO_2$  and VOC emissions at the Rubis Terminal sites were up 9% and 12.7% respectively compared with 2016 due to a 12% cumulative increase in the amount of

products (in tonnes) passing through all its sites. Bringing the product in and out of the facilities requires more electricity and heating, which explains the rise in emissions, which neverthless show a reduction in relative  $CO_2$  emissions.

Lastly, NO<sub>x</sub> emissions were down (-13%) over the period for two reasons: on the one hand, in Turkey, the percentage of natural gas, which produces less NO<sub>x</sub> and CO<sub>2</sub>, in the heating oil mix increased; on the other, in Antwerp, the diesel-run boiler was operated less frequently and an improvement in the vapor treatment process implemented when unloading LPG reduced the consumption of support gas and, consequently, NO<sub>x</sub> and CO<sub>2</sub> emissions.

The refining activity (support and services) generates gas emissions from its industrial transformation processes.  $CO_2$  emission sources include furnaces and combustion turbines, as well as boilers and flares. In 2017, the business saw a drop in atmospheric discharges compared with 2016 ( $CO_2$  emissions down 10.8%, NO<sub>x</sub> emissions down 12.3%, VOC emissions down 21% and  $SO_2$  emissions down 18% over the period). These significant falls were mainly due to long-term shutdowns of manufacturing units and combustion turbines. The vapor recovery rate was 92% in 2017 (up from 82% in 2016) due to better effectivesness of VRUs.

	CO₂ emissions (in tonnes)		NO <sub>x</sub> emissions (in tonnes)		VOC emissions (in tonnes)		SO₂ emissions (in tonnes)	
	2017	2016	2017	2016	2017	2016	2017	2016
Storage activity (Rubis Terminal)	25,220	23,757	20	23	329	292	Not identified	Not identified
Refining activity (Rubis Énergie)	132,325	148,288	253	288	219	278	469	573



5

## Controlling discharges into the air

## Petroleum products distribution activity

## Promoting the use of LPG, an alternative energy in the distribution activity

Several Rubis Énergie subsidiaries operate in the market for the distribution of LPG, and contribute to growth in its use. This is, the case for Vitogaz France, which carries out communication campaigns promoting the use of LPG in the automotive sector. As explained by the French Environment and Energy Management Agency (ADEME), vehicle engines running on LPG "discharge very few nitrogen oxides (NO<sub>x</sub>) and no particles. They produce few or no toxic, unregulated toxic pollutants compared to gasoline or diesel. Their CO<sub>2</sub> discharges are comparable to those of diesel, with equal engine power". Analysis recently carried out by a company specialized in emissions testing has shown that an LPG vehicle emits 18% less CO<sub>2</sub> on average, and 10 times fewer particles than a gasoline-fueled vehicle.

#### DISTRIBUTION OF AN INNOVATIVE AUTOMOTIVE FUEL: "ULTRA TEC ADVANCED FUEL TECHNOLOGY" IN THE DISTRIBUTION ACTIVITY

Rubis Énergie recently developed "Ultra Tec Advanced Technology," a new generation of high-performance additive-enhanced fuel specifically designed to reduce fuel consumption, enhance engine performance and thus reduce pollutant emissions.

#### REDUCTION IN THE MILEAGE OF DISTRIBUTION ROUNDS WITH ON-BOARD INFORMATION

To optimize delivery routes, thereby helping reduce the environmental impact of vehicle traffic, certain subsidiaries have equipped their truck fleets with on-board computers. Vitogaz France, for instance, has equipped its delivery trucks with an on-board communications system that automatically transmits daily delivery rounds to each truck, along with a proposed itinerary optimizing mileage as much as possible.



### Storage activity

Gasoline vapors are collected in Rubis Terminal's French storage terminals and some Rubis Énergie facilities (refining and certain depots and/or gas stations)

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

In addition, bulk gas storage tanks are equipped with floating covers, and loading is performed through "source" loading stations so as to minimize VOC discharges into the atmosphere. The handful of Rubis Énergie facilities that do not yet have these technologies will be equipped soon.

#### Initiatives on heating systems at Rubis Terminal's former storage sites or newly built sites, and in the Rubis Énergie refining facilities

As part of modernization programs, the boilers at Rubis Terminal sites are being replaced by heat pumps or mixed systems (heat pumps and boiler) or, local conditions permitting, by greener heating systems (geothermal for instance). The Rubis Energie refinery also has plans to install a new boiler that can be fueled with biomass.

### Support and services activity

## Production and use of renewable energy at the Rubis Énergie refinery

A number of initiatives were launched to promote the use of renewable energies, including:

- improvement of water resources by the collection of rainwater and desalination of sea water by reverse osmosis;
- the recycling of hydrogen into fuel for hydrogen fuel cells;
- the construction of a photovoltaic farm to generate electricity.

## EXAMPLE OF THE "ZERO VOC EMISSION" SYSTEM IN ANTWERP AND ROTTERDAM

For Rubis Terminal's Antwerp and Rotterdam sites, located in areas with a high concentration of industrial activity, a vapor treatment system capable of treating the widest possible range of products and using the best technology currently available has been installed. All tanks and loading stations for vessels, trains and trucks are connected to the system.

A regenerative thermal oxidizer (RTO) enables VOCs (Volatile Organic Compounds) contained in pure petroleum product vapors to be burned at high temperatures. If the VOC solvent concentration is in the optimal range, the oxidation process does not require any energy input. The Antwerp site oxidizer for pure petroleum products is capable of treating vapors, whatever their concentration in the air or in nitrogen. For the storage of liquefied gases, a large oxidizer treats the residual vapors of gas tankers, trucks and rail tanks in transfer stations, thereby eliminating discharges of residual vapors at sea.

In Rotterdam, the regenerative oxidizer for pure petroleum products can use the heat generated during treatment to produce steam to maintain the temperature of stored products.

A combustion unit in Rotterdam also destroys petroleum product vapors in compliance with discharge standards. It comprises a bed of metal fibers where vapor from the vessels and tanks is burnt.

Other systems are used to clean the fumes from specific products, such as a washer and a system of active carbon beds.

The Antwerp and Rotterdam depots also have systems to transfer vapors between the tanks of the sites and/or vessels, rail tanks or iso-containers, thereby eliminating vapor emissions caused by the operation.

Lastly, measures to combat fugitive emissions (escaping randomly or in an uncontrolled manner) are made through the use of flange gaskets for the storage of certain liquid products, enabling such emissions to be reduced fivefold.



I'M SAYING THINGS OF SUCH INTELLIGENCE THAT I MOSTLY CAN'T UNDER STAND WHAT I'M SAYING.



#### FOCUS ON THE MANAGEMENT OF HEATING SYSTEMS AT RUBIS TERMINAL'S EUROPEAN STORAGE SITES

For heating systems already in place at sites located in European Union countries, Rubis Terminal plans:

- systematic subcontracting of boiler operation and maintenance to specialist service providers, who can optimize consumption and thereby minimize CO<sub>2</sub> emissions;
- an increase in the efficiency of the heating system by converting "open vapor" systems to "closed vapor" systems, with a target of 100% return of condensates and the recovery of waste heat from the heat exchangers and tank coils;
- thermal insulation of condensate return circuits to conserve residual heat until its return to the boiler;
- replacement of all-or-nothing heating settings with modulated systems to reduce the temperature of products in storage and the heat loss in tanks;
- review of cost/technical options for tank insulation based on storage temperatures;
- a full review of the vapor purge system to minimize demand for steam;
- installation of boilers with economizers and low NO<sub>x</sub> emissions whenever boilers are replaced or, where possible, condensing boilers.

For new systems, such as the latest systems at the Rotterdam and Antwerp terminals, there are plans for:

- 100% condensate return, 100% thermal insulation of the condensate return circuits, optimized design of purges, systematic installation of modulable controls;
- in Rotterdam, basic steam produced by the regenerative oxidizer, as well as a boiler equipped with an economizer;
- in Antwerp, installation of a boiler fitted with an economizer and with low NO<sub>x</sub> emissions.

## 5.2.4 NOISE POLLUTION

The Group's activities, which are often located in industrial environments, do not generate significant noise (except for onsite alarms, which only operate very rarely, and truck traffic). However, subsidiaries work alongside local residents to improve noise identification and minimize noise pollution as much as possible (see section 5.3.2).





## 5.2.5 WASTE - HAZARDOUS WASTE

The activities of Rubis' subsidiaries generate little hazardous waste given their respective activities.

### Analysis by business line

The main sources of waste generation are storage and refining activities.

The petroleum products distribution activity generates virtually no hazardous waste, other than in the storage activity.

The only hazardous waste produced mainly comprises residues and sludge, which are treated as required by the applicable standards, as outlined below in respect of the storage activity. The storage activity generates 3 categories of hazardous waste:

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

Generation of hazardous waste as reported at Rubis Terminal sites rose by 17.9% between 2016 and 2017. This increase was primarily due to major works at several sites in Rouen (demolition of existing facilities). The clean-up operation and dismantling of part of the facilities on the Reichstett site also generated a high output of waste. The refining activity (support and services) produces hazardous waste mainly comprising petroleum product residues and sludge (from tanks and/or separators during maintenance) and chemical products. The volumes of hazardous waste reported in 2017 were up 54% compared with 2016. The significant change was due, primarily, to the

one-off production of oily sludge as a result of work on the bulk tanks.

	Volumes of hazardous waste (in tonnes)		Waste recovery rate	
	2017	2016	2017	2016
Storage activity (Rubis Terminal)	3,906	3,312	40%	41%
Refining activity (Rubis Énergie)	330	215	87%	62%

### Waste prevention and recycling measures and the fight against food waste

The Group has implemented innovative procedures and tools to minimize its production of waste, hazardous or otherwise. To this end, subsidiaries continue their efforts to increase the number of sites utilizing recycling networks for heat recovery, where such treatment is available nearby.

The waste recovery rate was maintained at the level reached in 2016 (40%) in the storage activity, thanks to efforts by the terminals to better identify established recovery channels. The rate of recovery of hazardous waste in the refining activity, up 25% in 2017 compared with 2016, was due to the drop in volumes of non-recoverable waste, in the absence of any temporary shutdowns of facilities over the period.

A continuous inventory of hazardous materials or substances is regularly reported to the local authorities (in the European Union). A register is kept available for inspection by the Regional Directorates of Environment, Planning and Housing (DREALs) at each French site.

Rubis Terminal and the Rubis Énergie refinery have also established a system of systematic sorting of non-hazardous industrial waste, a classification covering all waste that is neither hazardous nor inert. This sorting is performed through the use of suitable and appropriately positioned containers on each site. All subsidiaries are now equipped with them, with the exception of the Dörtyol terminal in Turkey (a study is underway, depending on the development of local channels).

Lastly, while **food wastage** is not really an issue in its activities, the Group is aware of this issue. Voluntary charitable collections are organized among the employees at certain subsidiaries. In the storage activity, Rubis Terminal employees are additionally trained in best practices in terms of food storage, and know how to satisfy the specific needs of the sector.

## 5.2.6 SUSTAINABLE USE OF RESOURCES

## 5.2.6.1 WATER CONSUMPTION

The water used and/or treated can be either standing (reservoirs or lakes) or flowing water (rivers) above ground, sea water, ground water or water from the distribution network supplying the site. Discharged water is abstracted water, plus, on occasion, rainwater.

### Analysis by business line

Issues related to water consumption mainly relate to the storage business and refining.

The distribution of petroleum products does not require the recurrent use of water for industrial processes. Water is consumed in only very limited quantities for fire drills and periodic checks of storage tanks, as well as for washing and requalification of LPG cylinders at cylinder filling plants.

In the storage business, the main sources of water consumption in the storage business are fire drills and the dosing of liquid fertilizers. This usual consumption is increased by occasional water requirements resulting from clean-up works. In 2017, reported consumption at Rubis Terminal sites was down 98% compared with 2016, mainly because of the completion of clean-up work at the Reichstett site. This site had a significant amount of water pumped out of the ground, this having been made mandatory to protect the groundwater from soil pollution (reduction in groundwater table). Authorization for this pumping to stop was given by the authorities as a result of work carried out by Rubis Terminal. Since then, a larger quantity of water is treated than is abstracted, since treated waste water includes rainwater.



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The refining activity (support and services) consumes water mainly through its industrial

transformation processes (boilers, etc.) and facilities' fire-fighting systems. Although up

slightly, water consumption remains below the regulatory threshold.

	Water used (in m <sup>3</sup> )		Water trea	Water treated (in m <sup>3</sup> )	
	2017	2016	2017	2016	
Storage activity (Rubis Terminal)	159,764	8,199,570	524,353	8,520,448	
Refining activity (Rubis Énergie)	249,287	244,400	105,065	112,484	

## Measures to reduce water consumption

In the activities with the highest level of consumption (storage and refining), significant efforts are made to reduce the net consumption of fresh water:

 the use of rainwater for refilling fire reservoirs and for dosing fertilizer. The facilities concerned have dedicated collection tanks;

## 5.2.6.2 ENERGY CONSUMPTION

The Group's activities consume energy in the form of electricity, steam and fuel, necessary for the smooth operation of facilities.

#### Analysis by business line

Energy consumed by the Group includes electricity, vapor and heating fuels, which contribute to the smooth running of the facilities.

The distribution of petroleum products activity is not energy-intensive. Most of the energy consumed is electricity consumed in depots and gas stations. In depots, it is used mainly for lighting, for product transfer (pumps for loading and unloading), and to supply LPG-cylinder filling equipment. In gas stations, it is used to transfer products, for air conditioning, refrigeration and lighting. treating wastewater allows Rubis Terminal's storage sites to report a higher volume of treated wastewater than the volume of freshwater used, as rainwater collected on sealed surfaces is also treated. In the Rubis Énergie refinery, all process water is collected and treated before being discharged into a modern residual water treatment unit. Systematic sampling and regular testing ensures

The storage activity consumes heating and automotive fuels and electricity, mainly to drive the pumps. Other energy requirements come not from activity but from clean-up work.

In 2017, net energy consumption at Rubis Terminal sites was up 4.8% on 2016, due to the 12% increase in products coming into and going out of all sites combined. The fact that the increase in net energy consumption was less than that of product transit, reflects greater energy efficiency.

The refining activity (support and services) consumed more fuel, vapor and electricity for the functioning of its industrial transformation process. Part of the energy consumed is, however, produced by that the water discharged complies with regulatory standards after the various stages of treatment;

 the project to invest in resources to produce industrial water at the Rubis Énergie refinery, using a seawater desalination unit (reverse osmosis), which should enable a significant reduction in net consumption of fresh water (see chapter 2, section 2.3).

cogeneration combustion turbines. Other energy production projects are also planned, such as the start-up of operations of a 1-MW hydrogen fuel cell to produce electricity. In 2017, the activity produced 134% of its electricity requirements (107,897 GJ of electricity produced compared with 80,261 GJ used) and the total volume of energy produced (electricity and steam) accounted for 35.1% of the energy consumed over the period, the same percentage as in 2016. Total energy consumption at the refinery (electricity and fuel combined) fell 9.1% due to unscheduled shutdowns of facilities. Energy produced declined in similar proportions between the 2 years, from 764,705 GJ in 2016 to 681,820 GJ in 2017 (-10.8%), for the same reason.

	Energy production (in GJ)		Energy consu	Energy consumption (in GJ)	
	2017	2016	2017	2016	
Storage activity (Rubis Terminal)	N/A	N/A	399,513	381,242	
Refining activity (Rubis Énergie)	681,820	764,705	1,944,234	2,226,012	

### Measures to save energy and promote alternative energy

As energy consumption often results in gas emissions and discharges into the air, several of the following measures are described in section 5.2.3.

# Reduction of energy consumption in storage terminals

As the energy consumed by the storage terminals is derived from the same source as the energy generating  $CO_2$  (pumps and boilers), the actions taken by Rubis Terminal to reduce energy consumption on sites, in terms of both existing and new heating systems, are described above (section 5.2.3).

#### Energy savings in gas stations

As part of the renovation work in gas stations, station lighting, particularly of canopies, was in many cases replaced by LED lights. LED technology not only helps generate significant savings in power consumption, it also offers a significant reduction in maintenance expenditure, the

## 5.2.6.3 CONSUMPTION OF RAW MATERIALS

As Rubis' petroleum product storage and distribution activities do not involve industrial transformation processes, consumption of raw materials is residual. life of the equipment being estimated at over 100,000 hours (20 years).

A recent analysis showed that, at a single Caribbean station open 24/7, annual electricity consumption could be cut from 50,000 kWh to 15,000 kWh, reducing the electricity bill by US\$15,000 per year (local cost of US\$0.44 per kWh), while significantly improving the light intensity in the distribution area, also improving personal safety.

## Supporting consumers in energy savings programs

The system of Energy Savings Certificates was introduced by the Energy Act of July 13, 2005 (POPE Law) with the aim of making energy savings in certain of sectors: construction, small and medium-scale industry, agriculture and transportation.

In practice, the Energy Savings Certificates system is producing additional financial leverage when it comes to energy management projects. Under this system, Vitogaz France supports, advises and provides funding for energy-saving initiatives through its Vitozéco program. Furthermore, in 2017, Vitogaz France led a program to raise awareness of electricity efficiency in overseas departments (Réunion, Martinique, Guadeloupe and Guyana). The promotion of LED lighting through the sale of over 150,000 bulbs to gas station customers in these territories made it possible to communicate easy-to-implement, ecofriendly practices adapted to meet the immediate needs of each household.

Reducing household energy consumption is no longer simply a matter of political will, it affects everyone and Vitogaz France has, for a long time now, been at the heart of the environmental protection movement; it is not by chance that it adopted the slogan *En avance par Nature* ("Moving forward naturally").

### Promoting alternative energy

The Group is involved in the promotion and increased use of alternative energy in several of its business lines. This contribution is described in section 5.2.3.

In the refining activity, the raw materials used are essentially transformed and for the most part not consumed (refined crude oil, blended fuels, etc.). In 2017, the volume of raw materials processed was down 10.9% on 2016 due to unscheduled shutdowns.

	Raw materials used (in tonnes	
	2017	2016
Refining activity (Rubis Énergie)	575,760	645,899

## 5.2.6.4 LAND USE

Rubis' activities do not involve extensive land use. Furthermore, the Group's main facilities (storage facilities, refinery) are located in industrial areas. As a result, to date, there have been no significant land-use conflicts

with the various natural ecosystems or with agriculture.



## 5.2.7 COMBATING GLOBAL WARMING

The Group has joined the fight to combat global warming by endeavoring to reduce its greenhouse gas discharges in its operations. Aware of the necessity of changing behaviors with regard to the consequences of climate change, the Group regularly encourages its customers to reduce their impact on global warming. Finally, the Group adapts its operations to climate change, which sometimes requires additional investments in sites.

## 5.2.7.1 REDUCING GREENHOUSE GAS EMISSIONS AND DISCHARGES

The refining and storage activities are the most significant contributors to greenhouse gas emissions in the Group.

Rubis seeks to implement a policy geared towards limiting the emissions detailed above (see section 5.2.3).

## 5.2.7.2 MEASURES AIMED AT CONSUMERS

Rubis Énergie distributes products, a number of which may contribute, when consumed by customers, to greenhouse gas emissions.

Aware of the options at its disposal to encourage a reduction in greenhouse gas emissions by customers, Rubis Énergie conducts information campaigns on homeowners' energy consumption habits in France through its Vitozéco program, described in section 5.2.6.2.

The Company also invests in the development of more environmentally friendly products, such as the "Ultra Tec" automotive fuel, described in section 5.2.3.

## 5.2.7.3 ADAPTING TO THE IMPACT OF CLIMATE CHANGE

The scientific work carried out by the Intergovernmental Panel on Climate Change (IPCC), and in particular the special report on extreme weather events, suggests that climate change could result in a higher number of extreme events. In this respect, section 5.2 and chapter 4, section 4.1 demonstrate the Group's willingness to monitor the vulnerability of its existing and future facilities, taking into account climate change projections and taking any appropriate safety measures.

## 5.2.8 PROTECTING BIODIVERSITY

The Group's activities do not have a significant effect on the ecosystem.

However, the Group endeavors to promote all measures liable to reduce pollution by

incorporating environmental issues into its ethical standards and through multiple preventive measures (see section 5.2.1).

Lastly, the Group has an active sponsorship and partnership policy with environmental protection associations (see section 5.3.2).



# 5.3 SOCIETAL INFORMATION

The Group has drawn up a list of the values and rules that it considers essential, and on which it has built its success. These internal principles, rooted in its strong corporate culture, encourage employees to become involved in the social and economic fabric surrounding them, by adopting responsible and supportive behavior.

## 5.31 RUBIS' ETHICS POLICY

Rubis' ethics policy covers a range of measures, both governing employees' behavior and subcontractors' and suppliers' behavior. It is reflected in the Group's commitments to its employees, such as the setting up of health and safety protection systems within subsidiaries.

## 5.3.1.1 FAIR PRACTICES

Rubis has developed an ethical framework shared by all of the Group's subsidiaries, as well as a policy in the fight against corruption and fraud. The Compliance and CSR Department within the Rubis Corporate Secretariat is the point of contact for subsidiaries and employees when it comes to ethical issues.

## **Rubis' Code of Ethics**

The Code of Ethics (available at www.rubis.fr), drawn up in 2015, lays down the values that Rubis considers fundamental:

- compliance with all applicable laws and • regulations wherever the Group operates;
- compliance with competition, confidentiality and insider trading rules, as well as with specific laws relating to war and/or embargo zones;

IS STRICTLY FOR BIDDEN.

- compliance with rules regarding health and safety conditions at work, as well as those pertaining to environmental protection:
- respect for people, including fundamental rights and human dignity, protection of privacy, as well as the fight against discrimination and harassment:
- prevention of conflicts of interest;
- management of relationships with external service providers;
- requirements in terms of the reliability, transparency and auditability of accounting and financial information;
- protection of the Group's image and reputation;
- fight against corruption, fraud, misappropriation of funds and money laundering.

In each of these fields, Rubis details the overall principles to be adhered to by employees in performing their duties.

The Group also ensures that its human resources policy complies, in all countries where it operates, with the principles relating to Human Rights at work listed in the International Labour Organization's fundamental conventions, in relation to:

- freedom of association and collective bargaining;
- elimination of discrimination in respect of employment and occupation;
- elimination of forced or compulsory labor;
- abolition of child labor.

## **Policy against corruption**

In line with its values and current legislation, and as a result of its presence in an increasing number of countries, in 2015, Rubis formalized the Group's commitment to fighting corruption in all its forms within its Code of Ethics. The Code lays down the basic rules governing the decisions taken by all Group employees. This commitment is reflected in the gradual implementation of an anticorruption program currently comprising the following measures:

- a guide to applying the anti-corruption **policy** that supplements the Code of Ethics. It aims to help those Senior Managers and employees who are most exposed, to identify at-risk situations and to adopt practical preventive measures. The guide lists prohibited practices, notably facilitation payments, and specifies the rules applicable to regulated practices, particularly in relation to gifts and invitations, third-party relations and sponsorship. This guide offers examples and makes practical recommendations;
- third-party assessment guidelines to help operating staff to identify third parties liable to present a risk, to perform due diligence and to deal with third parties on a case-by-case basis;

ANYTHING THAT HASN'T BEEN AUTHORIZED



- compliance risk assessment built into the Group's risk analysis approach: every year each of the Group's subsidiaries compiles a risk map, which, since 2016, has included a "compliance" section;
- model anti-corruption clauses to be inserted into general terms of business or long-term commercial contracts, as well as purchase and partnership (JV) agreements;
- awareness campaigns in respect of ethical and anti-corruption rules for employees in the most sensitive positions in all Group subsidiaries. The first campaign aimed at all subsidiary Managers was launched in 2015. A second campaign directed at employees in the most at-risk positions was launched in 2017;
- an internal accounting control system: verification of the implementation of the Group's key ethical and anti-corruption rules is already part of the internal risk control system set out in detail in chapter 4, section 4.2.3. Strengthening the integration of non-financial risks into internal audits is ongoing.

With regard to the fight against corruption and internal fraud, the powers of Managers at Rubis Énergie to incur expenses (depending on the annual budget approved in the Management Committee) are often subject to a double or even triple signature at the bank, thereby tightening control of capital expenditure or significant spending that exceeds a threshold set by the General Management. At Rubis Terminal, all expense commitments are signed by the Chief Financial Officer. All executives are made aware of this issue, and a control procedure for selecting suppliers has been implemented. It imposes systematic technoeconomic comparisons and a dual signature when making orders.

Rubis has set up a **compliance organization** that initiates the development of the anticorruption mechanism and supports its rollout:

 the position of Compliance and CSR Manager, reporting to Rubis' Corporate Secretary, was created in 2017, primarily to propose Group policies and procedures in relation to ethics and compliance and to support, in conjunction with the entities, their deployment and implementation throughout the Group's entities;

 Compliance Officers have gradually been appointed in subsidiaries to ensure that the anti-corruption policy is well understood and is being applied in the field.

The Group is committed to a **continuous improvement process** and supplements its anti-corruption mechanism in accordance with changes in legislation, in particular, the French law on transparency, fighting corruption and modernizing the economy, referred to as Sapin 2, and best practices.

### **Fighting fraud**

The main risk of internal fraud lies in the theft or misappropriation of products. The Group has therefore established strict measures to verify production volumes, including the automation of transfer stations to reduce human intervention as much as possible, inventory adjustment checks, or upgrades of control systems.

Lastly, the increase in external fraud attempts (CEO impersonation, hacking) has prompted the Group to conduct an information campaign with the aim of raising the awareness of all employees likely to be approached (accounting, financial or legal functions) in order to fight this type of fraud more effectively.

## 5.3.1.2 REQUIREMENTS FOR SUBCONTRACTORS AND SUPPLIERS

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

### Responsible purchasing policy

The Code of Ethics stipulates that employees have a task of oversight, and that it is therefore their responsibility to ensure that third parties properly apply the Group's standards when they work on its sites. If required, they must conduct awareness or training actions and, in the event where the ethical rules are violated, advise their Managers.

Moreover, the Code of Ethics states that the Group's subsidiaries must require the

external service providers with which they work (suppliers, subcontractors, industrial or commercial partners) to comply with internal standards related notably to safety, environmental protection and respect for individuals.

Any breach of the Group's ethical standards must be communicated to the supervisor and/or the management of the subsidiary or facility as quickly as possible.

Lastly, to avoid conflicts of interest, the Code of Ethics stipulates that an employee must not (i) acquire a significant interest in a supplier, or in a company or group to which a relative or family of the supplier belongs and with which Rubis has conflicting interests, or (ii) accept any gifts or hospitality not in accordance with the Group's rules on the subject.

## Measures for incurring expenses and control

The provision of the services and supplies used on Rubis Terminal's industrial sites is governed by the Group's social and environmental policy (see section 5.2.1).

Rubis' subsidiaries factor health, safety and environmental issues into the process of selecting solutions from their suppliers, when such companies work on their facilities. They favor those that reduce energy consumption and waste without compromising safety.

This is the case in the choice of heating by heat pump in newly constructed buildings at Rubis Terminal.

Contracts stipulate that suppliers must comply with the applicable Labor Law, including the fight against illegal employment and the respect of working hours.

Third-party assessment guidelines also provide for ethical risk assessment in relation to their main trading partners, including suppliers and service providers.

The Group ensures that its suppliers, which generally operate nationwide or internationally, are certified whenever possible, and that they meet the stringent regulations liable to be imposed on them (transportation of hazardous materials, manufacturing of pressurized equipment, etc.).

## 5.3.1.3 PROTECTION OF CUSTOMER HEALTH AND SAFETY

The Group's subsidiaries place particular importance on the health and safety of consumers and business customers. Depending on the sector in which they operate and the specific expectations of their customers, subsidiaries take various initiatives:

 a demanding risk-prevention policy is in place in all subsidiaries, to protect all employees liable to be involved in the handling of products stored or distributed on or from its sites. This policy, which gives rise to substantial internal prevention and control systems is described in section 5.2.1 and in chapter 4, sections 4.1 and 4.2;

- the Seveso regulations, extremely stringent as regards health and safety obligations, are complied with by relevant European storage sites;
- several subsidiaries have obtained ISO 9001 and 14001 certifications, others are in the process of obtaining certification (see section 5.2.1.1). Recognition of this nature attests to commitments for the health and safety of individuals and respect for the environment.

The quality of the customer relationship is a key element of the strategy of the subsidiaries, but also a critical factor in information relating to consumer health and safety. The resulting initiatives vary depending on the type of customer.

**Vitogaz France** has obtained the NF 345 certification, devoting significant efforts to improving customer information and managing their supply contracts.

## 5.3.2 REGIONAL, ECONOMIC AND SOCIAL IMPACT

Committed towards local populations, Rubis' subsidiaries value the dialog with stakeholders and the promotion of the dynamics of the regions where they operate, as much at the economic and employment levels as in the area of "living together".

The Group also engages in an active and targeted sponsorship policy.

## 5.3.2.1 CLOSE RELATIONSHIPS WITH STAKEHOLDERS

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

The Group also consistently considers the impacts of their facilities and activities on residents' lives. Indeed, this is a requirement for Seveso sites, resulting in the signing of Technological Risk Prevention Plans (PPRT) drawn up with local authorities and relevant associations. Measures have been taken in favor of residents living near industrial sites, aimed notably at avoiding or lessening

the nuisances associated with truck traffic, through the purchase or leasing of land to create parking stations for tank trucks waiting to be filled, or the creation of a truck booking system for loading on certain sites.

When the activity conducted locally requires it, site Managers also have regular contact with all government stakeholders at the local, regional and national levels for the enforcement of regulations and for operating permits:

 in France: DREAL (Regional Directorates of Environment, Planning and Housing), DRIEE Île-de-France (Regional and Interdepartmental Directorate of Environment and Energy), CLIC (Local Information and Consultation Committees), CSS (Site Monitoring Committee), local government, prefecture, SDIS (Fire and Rescue Department), Customs;

 in the Netherlands, Belgium and Turkey: with agencies responsible for buildings or the verification of regulatory compliance, including the safety and security of facilities, compliance with environmental standards and compliance with customs regulations.

The subsidiaries also take an active part in regional campaigns on major industrial hazards to inform local populations about operations carried out on its sites, the products stored and safety issues. Some site Managers have accordingly visited schools to raise public awareness about such risks. Others have organized tours of the industrial facilities for young people, reporters or elected officials.



## 5.3.2.2 ECONOMIC AND SOCIAL INVOLVEMENT IN REGIONAL COMMUNITIES

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

One noteworthy result of their operations is a contribution to local employment, with sites giving preference most often to business relationships with local suppliers.

This is the case in the storage activity (Rubis Terminal), where the terminals work primarily with local service providers, which are familiar with the various facilities and their developments. This means that the promotion of local employment helps optimize maintenance and routine upkeep of sites by contractors.

Within the support and services activity (Rubis Énergie), the SARA refinery also contributes greatly to the strength of the local job market: the number of direct and indirect jobs is estimated at 600 across the 3 French overseas departments (Martinique, Guadeloupe and French Guiana).

In the distribution activity (Rubis Énergie), the network of small- and medium-sized facilities

(gas stations, small depots) has a significant impact on employment. For instance, the Group has roughly 260 gas stations in the Caribbean.

In addition to direct impacts in terms of hiring, the Group's facilities are a key driver of the local economy, insofar as the storage, distribution, and support and services activities satisfy strategic requirements such as the storage of products used in industrial processes, the supply and transportation of bitumen to improve the road network and the provision of fuel, etc.

The operations of Rubis Terminal's depots are part of the logistics chain in the fields of chemicals, petrochemicals, agrifood and liquid fertilizers, serving industries located nearby. Their presence and adaptability are therefore essential for the development of regional industries. For instance, Rubis Terminal serves the whole of the Lyon and Grenoble chemicals valleys.

Lastly, this role in regional development is also reflected in the subsidiaries' involvement in community life in the areas where the Group operates. Subsidiary and site Managers maintain close ties with local communities, and the law on Technological Risk Prevention Plans (PPRT) has promoted further dialog and even closer relations.

Rubis Terminal, for instance, has close ties with the ports with which it has signed concessions (Rotterdam, Antwerp, Rouen, Strasbourg, Dunkirk and Brest). The Company encourages its site Managers to take on responsibilities within port authority bodies: the Director of the terminals in Alsace has been elected to the Chamber of Commerce and Administration of the Port of Strasbourg. In general, terminals located in industrial areas are actively involved in the work of local associations, with a view to maintaining economic activity in the area.

More broadly, the subsidiaries' involvement in communities in regional areas also results in active participation in efforts supporting, promoting or preserving the cultural heritage and the volunteer sector. Commitment of this type complements the Group's sponsorship activities.

## 5.3.2.3 THE GROUP'S SPONSORSHIP ACTIVITIES

The Group's community involvement includes sponsorship activities, either directly through Rubis and its subsidiaries, as well as through its endowment fund, Rubis Mécénat.

## Actions for health and education

Rubis societal initiatives currently bring together 24 non-profits that are supported in 17 countries where the Group operates. Rubis Group's international sponsorship, primarily focused on health and education, helps 17,671 people, including 16,838 children.

These commitments allow Rubis to reaffirm its support for the actors conveying universal values, cornerstones of a responsible and forward-looking corporate culture.

The most important projects supported by Rubis include:

### • L'École à l'Hôpital

Since 2013, Rubis has been supporting L'École à l'Hôpital, an association that aims to arrange for school lessons for young patients aged between 5 and 26 in the Paris region. Qualified teachers volunteer to provide these free lessons, tailored to all levels and needs, in hospital and at home. A total of 4,476 young patients received 22,648 lessons given by 505 teacher's volunteers in 2017.

In 2017, 8 Group employees took part in the *Course des Héros* race and raised €5,084 for L'École à l'Hôpital.

#### • Graines de Bitume

This Malagasy association aims to help street children in Antananarivo, promoting their reintegration and supporting them in their education and vocational training. Vitogaz Madagascar was keen to help the 270 beneficiaries by giving them access to such basic needs as food, health, hygiene, leisure, education and vocational training.

Graines de Bitume's work to empower children focuses on 3 programs: an educational program (literacy, schooling and tutoring), an after-school program (development of artistic expression) and a professional program (thinking about their future and supporting their integration into a professional activity).

A committed player, Vitogaz Madagascar organizes solidarity days, including the distribution of afternoon tea at Christmas, recreational outings, Vitogaz site visits for young people in professional integration programs, fundraisers, etc.

#### • Surf Insertion

Surf Insertion, an association created in 1997, allows young people from inner cities and rural areas to enjoy wave sports on the French coast. This action is accompanied by awareness raising in eco-citizenship (cleaning beaches, uprooting invasive plants, etc.).

Since 2013, financial support from Rubis has enabled Surf Insertion to expand its activities to reach a greater number of young people and has enabled educational and leisure materials to be produced. In 2017, more than 5,000 young people aged 8 to 25 participated in Surf Insertion workshops, with more than 300 outings to French surf beaches.

#### • Viens lire au Louvre

Since 2014, Rubis has provided funding for the Viens lire au Louvre project, designed to introduce students from elementary to middle-school level to the practice of reading literary texts out loud. This project serves as the base for a multidisciplinary educational program around a given theme for classes at schools in priority education areas, relying as much as possible on the full range of the resources of the Louvre museum.

The program is divided into different activities: workshops on reading in class, listening to professionals read aloud in the Louvre auditorium, museum visits and workshops and, lastly, an end-of-year show put on by the students, the theme for 2017 being *II faut que ça bouge* (Let's get moving!).

© Graines de Bitume



© L'École à l'hôpital





© Viens lire au Louvre - Florence Brochoire



© Surf Insertion - William Visage/Surf Reporter - Lacanau Océan



#### CLOSE-UP OF... LOCAL COMMITMENT

This year the Group wanted to adopt an international outlook to enable Rubis to lend its support in each of the countries where it operates, through its local subsidiaries. Since the Group has experienced rapid growth in a number of disadvantaged or middle-income countries, Rubis has become aware of its corporate responsibility and its duty to integrate more closely. As well as offering financial support, the Group encourages its employees to get involved in local communities by giving time to local activities, raising money or taking part in local community events.

The Group supports non-profits whose spheres of activity are wide-ranging: vaccination campaigns, aid for street children, surgery, building schools, preventing endemicillnesses, cultural development and education for disadvantaged children.

The numerous local projects supported by Rubis include:

#### • The Association de Bienfaisance Sidi Bernoussi (Morocco)

Since its creation in 1986, the Association de Bienfaisance Sidi Bernoussi has provided shelter and protection to vulnerable children by offering them a place where they can be housed, fed and cared for, as well as education to prepare them for social and professional integration and help them to become independent, fulfilled adults.

The orphanage houses a total of 260 boys who have been abandoned, who are orphans or who come from poverty-stricken families.

Support from the local subsidiary, Vitogaz Maroc, has enabled the orphanage's kitchen, bathroom facilities and dormitories to be refurbished.

In late 2017, the Group organized a shoe collection in France, in aid of children at the orphanage.

#### • Streams of Hope (Togo)

Streams of Hope was set up in 2009 to fight the poverty experienced by the rural Togo population, focusing on programs to improve living conditions.

The aim of this initiative is to raise rural communities' awareness of the importance of methods of contraception and to encourage pregnant women to have pre- and post-natal check-ups in order to avoid some of the adverse effects that can occur during childbirth.

In total, the non-profit gave 1,287 women check-ups and an additional 1,693 people received education on the issue, notably within a school setting.

#### • Volta a Portugal (Portugal)

In 2017, volunteers pedaled 3,266 km on the Rubis Energia Portugal stand as part of the Volta a Portugal – *Pédaler pour la bonne cause* (Pedal for a good cause) initiative, and raised €19,500 which was then shared between 3 non-profits:

- Dançando Com a Diferença: founded in 2001, Dançando Com a Diferença promotes the concept of "inclusive dance". The non-profit offers various activities in schools and in certain vocational centers in Madeira. It assists over 100 people every week by distributing food, clothing and household utensils;
- Associação Acreditar: this network, created in 1994, deals with the many challenges of childhood cancer. It provides emotional, logistical and social support for children and their close relatives. Each year, more than 1,000 families received help from Acreditar;
- Ajuda de Berço: this non-profit focuses on children, from birth to the age of 3, who have been abandoned, in order to give each one a decent life by returning them to their biological family or placing them with an adoptive family. At present, Ajuda de Berço has the capacity to accommodate 40 children. Since 1998, the non-profit has taken 378 children under its wing.



© Volta a Portugal - Associação Acreditar



© InPulse - Nile Saulter

## Rubis Mécénat: corporate cultural sponsorship

Rubis set itself the task of encouraging artistic creation *via* its cultural fund, Rubis Mécénat, created in 2011 to strengthen its ties with its subsidiaries, to help the Group play an active role in its socio-cultural environment and keep its corporate culture alive. As an industrial, social and cultural player in the countries where it operates, Rubis is stepping up its efforts in each region and is giving something back by setting up cultural projects.

The purpose of Rubis Mécénat is:

- to foster artistic creation by supporting, both in France and internationally, emerging or established artists by commissioning works for specific sites and for the Group's industrial sites;
- to develop sustainable socio-cultural projects in some of the Group's host countries, in collaboration with its subsidiaries, as well as local and international artists, to provide artistic education and skills development to young adults from local communities, by engaging in the visual arts;
- to acquire works of art from the artists that it supports for display within the Rubis Group.

Art projects conducted in 2017 include the commissioning of the Belgian photographer, Geert Goiris, in collaboration with Rubis Terminal and the Frac Normandie Rouen (regional contemporary art collection), to take a wide-ranging series of photographs of the industrial landscape of Rubis sites in Europe (which were displayed in Rouen and were the subject of an art book), as well as the commissioning of a Réunion collective, Kid Kréol & Boogie, to create a fresco to decorate the water tank at the entrance to the SRPP depot in the Port in Réunion, extending 48 meters along the adjacent wall.

Rubis Mécénat's long-term socio-cultural projects include:

#### the Of Soul & Joy photo project in South Africa, in collaboration with its Easigas subsidiary

A sustainable community and arts initiative launched in 2012 by Rubis Mécénat and the South African subsidiary, Easigas, in Thokoza, a township southeast of Johannesburg in the East Rand, to enable vulnerable youth in the township to develop artistic skills in the field of photography. Each year, the most promising students receive a scholarship giving them access to higher education in photography at a university of their choice.

Since 2012, over 100 students have taken part in the program, 21 scholarships have been granted, almost 100 intensive workshops have been led by renowned photographers and more than 10 exhibitions and events have been organized in South Africa and internationally, etc. In 2017, Rubis Mécénat celebrated the fifth anniversary of this socio-cultural project and launched a partnership with *Rencontres de la photographie d'Arles* and the Paris festival, *Photo Saint-Germain*;

#### the InPulse artistic project in Kingston, Jamaica, in collaboration with the subsidiary, Rubis Énergie Jamaica

Project launched in 2015 in the community of Dunoon Park, in east Kingston, aiming to realize the potential of Jamaican youth and improve the lives of young adults from local communities in Kingston, through the practice of visual arts as a means of positive expression. Every year the project awards scholarships to the most promising students, allowing them to pursue their higher education at the Edna Manley College of the Visual and Performing Arts in Kingston.

Since 2015, some 50 students have taken part in the program, 3 scholarships have been awarded and a dozen artists have been invited, etc.

In 2017, a number of workshops were held with Jamaican visual artists and an exchange was organized with the Haiti contemporary art biennial, the Ghetto biennale, which was attended by 3 of the project's students, accompanied by their project leader.



## *5.4* **CROSS-REFERENCE TABLE** AND METHODOLOGICAL NOTES

This section contains a cross-reference table and a methodological note designed to facilitate understanding of the CSR information. Accordingly, it has been decided to present the CSR reporting scope and methods for reporting CSR information and the key definitions contained in the internal standards for reporting employee and environmental information. These publications will enable the reader to have a more precise understanding of the field of application and the relevance of each piece of information.

## 5.4.1 CROSS-REFERENCE TABLE

The information contained in this chapter was prepared to comprehensively address the provisions of the implementing decree of Act No. 2010-788 of July 12, 2010, known as "Grenelle 2," Article 70 of Act No. 2015-992 of August 17, 2015 concerning the energy transition for green growth,

Article 4 of Act No. 2016-138 of February 11, 2016 on the fight against food waste and Decree No. 2016-1138 of August 19, 2016. The provisions of the new Article R. 225-105 of the French Commercial Code, applicable to reports for fiscal years beginning on or after September 1, 2017, will be applied as from the Group's Registration Document for the 2018 fiscal year.

The indicators presented have been treated, and information provided, in view of their relevance to the Group's businesses.

nformation required pursuant to Articles L. 225-102-1 and R. 225-105-1 of the French Commercial Code applicable prior to July 22 and September 1, 2017, respectively)	Sections of chapter 5
I) Employee relations	
a) Employee-related information	
total headcount and breakdown by gender, age and geographic area	5.1.1.1 and 5.1.5.2
hirings and dismissals	5.1.1.2
compensation and changes in compensation	5.1.6
) Organization of work	
organization of working hours	5.1.2.1
absenteeism	5.1.2.2
Employee relations	
organization of employee dialog, particularly the procedures for informing and consulting employees and negotiating with the	m 5.1.3
review of collective agreements	5.1.3
Health and safety	
health and safety conditions at work	5.2.1
review of collective agreements signed with unions or employee representatives regarding health and safety at work	5.1.3
accidents at work, with particular reference to frequency and severity, and work-related illness	5.2.1.2
Training	
policies implemented in respect of training	5.1.4
total number of training hours	5.1.4
Equality of treatment	
measures taken to promote gender equality	5.1.5.2
measures taken to promote the employment and inclusion of people with disabilities	5.1.5.4
anti-discrimination policy	5.1.5.1 and 5.3.1
) Promotion and compliance with the provisions of the fundamental conventions of the International Labour Organization (ILO) on	
respect for freedom of association and the right to collective bargaining	5.3.1
elimination of discrimination in respect of hiring and occupation	5.3.1
elimination of forced or compulsory labor	5.3.1
effective abolition of child labor	5.3.1

	ormation required pursuant to Articles L. 225-102-1 and R. 225-105-1 of the French Commercial Code plicable prior to July 22 and September 1, 2017, respectively)	Sections of chapter 5
2)	Environmental information	
a)	General policy regarding environmental concerns	
	organization of the Company to take into account environmental issues, and to take any necessary steps for environmental assessment or certification	5.2.1
•	employee training and information aimed at protecting the environment	5.2.1 and 5.1.4
•	methods used to prevent pollution and environmental risks	5.2.1 to 5.2.8
	amount of reserves and guarantees for environmental risks, provided that this information is not such as to cause serious prejudice to the Company in an ongoing dispute	Note 4.11 to the consolidated financial statements
	Pollution	
•	prevention, reduction or repair of discharges with serious environmental impact on air, water or soil	5.2.2 and 5.2.3
•	noise and other pollution specific to a particular business	5.2.4
c)	Circular economy	
i-	Waste prevention and management	
	preventive measures, recycling, reuse, other forms of recovery and disposal of waste	5.2.5
	initiatives against food waste	5.2.5
	Sustainable use of resources	
	water consumption and water supply, in view of local constraints	5.2.6.1
	consumption of raw materials and measures taken to improve efficiency in their use	5.2.6.3
	energy consumption, measures taken to improve energy efficiency and use of renewable energy	5.2.6.2 and 5.2.3
	land use	5.2.6.4
	Climate change	
	significant sources of greenhouse gas emissions generated due to the Company's business, including the use of the goods and services it produces	5.2.3 and 5.2.7
•	adaptation to the impact of climate change	5.2.3 and 5.2.7
e)	Protecting biodiversity	
•	measures to preserve or enhance biodiversity	5.2.8
	Information on societal commitments to promote sustainable development	
	Regional, economic and social impact of the Company's operations	
	on employment and regional development	5.3.2
	on neighboring or local populations	5.3.2
wit	Relationships with individuals or organizations with an interest in the Company's operations, h particular reference to organizations that promote employment and inclusion, educational institutions, <i>r</i> ironmental protection organizations, consumer associations and neighboring populations	
•	conditions for dialog with these individuals or organizations	5.3.2
•	partnerships or sponsorship activities	5.3.2
c)	Subcontractors and suppliers	
•	consideration given to social and environmental issues in the purchasing policy	5.3.1.2
	importance of subcontracting and consideration, in relationships with suppliers and subcontractors, of their social and environmental responsibility	5.3.1.2
	Fair practices	
	actions taken to prevent corruption	5.3.1.1
•	measures taken to support consumer health and safety	5.3.1.3
e)	Other actions taken to support Human Rights in relation to this section	5.3.1



## 5.4.2 CSR REPORTING SCOPE

## 5.4.2.1 EMPLOYEE-RELATED DATA

The scope for employee relations reporting corresponds to the Group's financial scope. The applicable reporting method is proportional consolidation.

The information is presented separately for Rubis Terminal (storage activity) and Rubis Énergie (distribution business, and support and services activities), and by geographic area.

Employee-related data from an acquired or created entity is consolidated on its entry into the scope of consolidation (see note 3 to the consolidated financial statements). Data on entities disposed of or liquidated during the fiscal year are excluded from CSR reporting from the moment that they leave the scope of financial consolidation.

## 5.4.2.2 ENVIRONMENTAL DATA

The consolidation scope for environmental information comprises those entities in which the Group holds a stake of at least 50%. The exact scope may vary depending on the environmental indicator, according to their relevance and the accounting methods applied (see section 5.4.4 below). Each item of environmental data is published for each business line. Figures are reported for those activities with the most significant environmental impact (storage at Rubis Terminal and refining at Rubis Énergie).

Unless otherwise indicated, the environmental data of acquired or created entities is integrated from the time that they enter the scope of consolidation. Data on entities disposed of or liquidated during the fiscal year are excluded from CSR reporting from the moment that they leave the scope of financial consolidation.

## 5.4.3 DATA REPORTING METHODS

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

Employee-related data must be reported annually in line with the procedural requirements stated by Rubis Énergie/ Support and Services or Rubis Terminal, in January.

For several years, the Group has also been running a process to map significant environmental risks. The data used to identify, monitor and manage these risks is described in chapters 4 and 6 of this Registration Document.

## 5.4.3.1 COMPARABILITY AND RELIABILITY OF INFORMATION

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

However, environmental data is only comparable at the division level.

As the strength of the Group's business has resulted in significant external growth, the CSR reporting scope also changes on a regular basis, and therefore does not allow for true comparability of data across several years.

In partnership with the Management of the subsidiaries concerned, a set of reporting standards for employee relations and environmental information was drawn up. These standards provide a precise definition for each data item mentioned in the information reporting protocols, with the aim of reducing the risk of differences in interpretation of terminology.

## 5.4.3.2 CONSISTENCY CHECKS

The collected data are subject to consistency checks locally. Further checks may be performed by Rubis Énergie or Rubis Terminal, or by the Rubis CSR Department. The consistency between the financial consolidation scope and the employeerelated data is checked automatically at Rubis Énergie using the dedicated consolidation software, and by the Legal Department at Rubis Terminal.

## 5.4.3.3 CHANGE OF METHODOLOGY

Unless otherwise provided, methodology cannot be changed after the start of the information reporting process within Group entities. Changes of methodology are prepared and/or overseen by the Rubis CSR Department after consultation with Rubis Énergie/Support and Services and Rubis Terminal. They take into consideration, where applicable, observations made by stakeholders on the relevance and quality of the definitions contained in the framework.

## 5.4.3.4 DATA REPORTING TOOLS

## Employee-related data

For all entities, the reporting protocols dealing with employee-related data include similar information based on the standardized definitions set out in the "standards for reporting employee-related data ".

Rubis Énergie (Distribution and support and services activity): since 2013, employeerelated data have been comprehensively integrated into the financial consolidation information system. This resulted in a simplification of the transmission of information by subsidiaries, as well as the automation of the calculations performed for the production of consolidated data.

**Rubis Terminal (storage activity)** a reporting protocol was distributed to each relevant subsidiary, joint venture or

joint operation, and then centralized and consolidated by the competent teams at Rubis Terminal.

#### **Environmental data**

As the environmental impacts of Rubis Terminal and Rubis Énergie are not comparable (see section 5.2.1), the data calculation methods may vary according to the activity. However, the same definitions, which are set out in the "standards for reporting environmental information" are used for both divisions.

#### Societal data

Societal data is produced in part by Rubis (under the Group's ethics policy). With regard to charitable and sponsorship initiatives, as well as dialog with stakeholders and commitment to local areas, the information collected may come from public communications by subsidiaries and/or a societal information reporting protocol at Rubis Terminal.

## 5.4.4 **DEFINITIONS**

Terms	Definitions
1) Employee relations	
Unjustified absences	Absence without a medical certificate or without taking leave.
Accident at work	An accident affecting an employee of a Group entity, where a medical certificate or investigative findings establish that the accident was directly caused by the employee's work at the entity concerned, and which leads to lost time (total or partial).
	Note:
	<ul> <li>for the Group's entities operating in France, the information includes employees' commuting accidents occurring off-site, in accordance with applicable law;</li> </ul>
	<ul> <li>for the Group's entities operating outside France, the inclusion or exclusion of employees' commuting accidents depends on local laws.</li> </ul>
Non-occupational accident or illness	An accident or illness affecting an employee of a Group entity where there is no medical certificate demonstrating that the illness was caused by the employee's work for the entity concerned.
	Note: events related to parenting (birth, adoption, etc.) should not be counted as accidents or illnesses.
Collective agreement	An agreement negotiated by the labor unions at the division level within which Group entity operates and whose provisions apply to the entity concerned.
Company agreement	An agreement negotiated by one or more labor unions and the Management of the Group entity concerned.
Pay raise	Additional compensation or additional benefit awarded by a Group entity to an employee (who receives it on an ongoing basis).
Fixed-term contract	A work contract signed between an employee and a Group entity, for which the term is fixed.
	<b>Note:</b> fixed-term contracts may include apprenticeship contracts and occupational training contracts but do not include internship contracts.
Permanent contract	A work contract signed between an employee and a Group entity, for which the term is not fixed.
	<b>Note:</b> fixed-term contracts do not include apprenticeship contracts or occupational training contracts, other than in exceptional and very rare cases. They do not include any internship contracts.
Part-time contract	Any work contract signed by an employee and a Group entity for weekly and/or monthly working hours that are less than the legal full-time working hours as laid down by applicable legislation.
	<b>Note:</b> part-time contracts may include apprenticeship contracts and occupational training contracts but do not include internship contracts.
Full-time contract	Any work contract signed by an employee and a Group entity for weekly and/or monthly working hours equaling legal full-time working hours as laid down by applicable legislation.
Apprenticeship contract or occupational training contract	A contract between a person following an academic training course (at university or in a training center) and a Group entity, in principle, for a fixed term of 6 months or more (except where there is an exception provided for in the applicable legislation), entitling them to call themselves an employee of the signatory company.
Internship contract	A contract between a student and a Group entity for a fixed term of less than 6 months (except where there is an exemption provided for in the applicable legislation). The internship contract does not give students the status of employee at the Company, although they may receive certain benefits under national legislation.



Terms	Definitions
Temporary contract	Temporary work contract concluded between an external service provider and a person then assigned to a service delivered to an entity of the Group. Temporary contracts do not confer Group employee status on the temporary staff member. His or her assignment to an entity of the Group should not be counted as a hire.
Death resulting from an accident at work	Death considered to be an accident at work under the applicable legislation affecting an employee of a Group entity, when it is medically established that the accident is the cause of death.
Unilateral decision	A decision taken unilaterally by the Management of the Group entity concerned, after discussion with the employee representatives, if applicable.
Resignation	The departure of an employee (including those in trial periods) from a Group entity, at his/her own request, that is not considered a dismissal or a departure by mutual agreement under the applicable legislation.
Retirement	The departure of an employee from a Group entity as a result of his/her right or obligation to retire, in accordance with the applicable legislation.
Professional training	Training offered or delivered by a Group entity to one of its employees, either in-house or through an external provider, and by any means (traditional classroom training or e-learning).
	Professional training covers:
	<ul> <li>training required by the applicable health and safety regulations;</li> </ul>
	<ul> <li>training aimed at expanding the expertise and knowledge of each employee.</li> </ul>
	Note:
	<ul> <li>the number of training hours delivered and the number of employees trained must be recorded;</li> </ul>
	<ul> <li>recognized training hours are those that were actually performed;</li> </ul>
	<ul> <li>for the specific case of long courses spanning several years, hours recognized are those delivered respectively in each year;</li> </ul>
	<ul> <li>employees in receipt of several training courses over the aforementioned reporting period must only be recognized once when calculating the number of employees trained over the period.</li> </ul>
Total and irreversible disability	When an employee of a Group entity can no longer carry out work of any kind for that entity, due to an occupational illness or accident at work.
	Total and irreversible disability must be demonstrated by at least one medical certificate, issued without condition.
Dismissal	The layoff of an employee (including those in trial periods) at the request of a Group entity, whatever the type of layoff, provided that it is not considered a resignation or a departure by mutual agreement under the applicable legislation.
Occupational illness	An illness affecting an employee of a Group entity where a medical certificate demonstrates that the illness has been directly caused by the specific nature of the employee's usual work for the entity concerned.
Number of days worked	Total number of days worked by employees in the reporting period.
per year	<b>Note:</b> absences, non-business days, public holidays and leave (including parental leave) are not included in the calculation of the number of working days. Moreover, the total number of working days per year, which is used as the basis for the calculation of absenteeism rates, results from the conversion of the average number of hours worked each day, and may vary slightly from one subsidiary to another, taking into account applicable laws and the nature of the activities carried out locally.
Annual number of hours worked	Total hours actually worked by all employees of a Group entity in the aforementioned accounting period. The number of hours worked per year may be calculated on the basis of a daily average established under prevailing law.
	<b>Note:</b> absences, non-business days, public holidays and leave (including parental leave) are not included in the calculation of the number of hours worked.
Hirings	New work contracts signed between an employee and a Group entity during the reporting period in question. <b>Note:</b>
	<ul> <li>hirings include employees in trial periods and on apprenticeship contracts and occupational training contracts, but not internship contracts or temporary contracts;</li> </ul>
	<ul> <li>transfers involving a change of employer are included in hirings. Where there is no change of employer, transfers are not reported;</li> </ul>
	<ul> <li>multiple entries corresponding to the hiring of the same employee used by an entity of the Group several times during a single accounting period, under a fixed-term work contract, may only be recorded as one hire.</li> </ul>

Terms	Definitions
Departure by mutual agreement	The departure of an employee of a Group entity (including those on trial periods) as a result of an amicable agreement between the 2 parties that was not imposed by one of the parties on the other. Accordingly, departures by mutual agreement are not considered as dismissals or resignations by the applicable legislation.
	Note:
	<ul> <li>transfers resulting in a change of employer must be counted among departures by mutual agreement. Where there is no change of employer, transfers are not reported;</li> </ul>
	<ul> <li>expirations of fixed-term and internship contracts are not counted among departures by mutual agreement. They are recognized separately;</li> </ul>
	<ul> <li>multiple departures corresponding to the expiration of several fixed-term work contracts concluded with the same employee of an entity of the Group during a single accounting period are not counted among departures by mutual agreement. They should be recognized with expirations of fixed-term and internship contracts.</li> </ul>
Employees	An employee is a person who has signed a work contract with a Group entity that remains in force at the reporting date in question.
	This category includes:
	<ul> <li>full-time or part-time contracts, whether or not the work is done in shifts;</li> </ul>
	• in countries where this legislation applies: apprenticeship contracts and occupational training contracts.
	This category does not include:
	internship contracts;
	<ul> <li>external service providers working for Group entities that have not signed a work contract with the entity concerned;</li> </ul>
	<ul> <li>temporary staff, who are the employees of an external provider (temporary staffing company), notwithstanding the fact that they work on the site of a Group entity.</li> </ul>
	Expatriate employees or employees seconded to a different entity from the one they originally joined must be recorded at the host entity.
Non-executives, executives	To enable global harmonization of reporting, employees were distinguished as follows:
or Senior Managers	Non-executives: non-executives and non-Managers.
	Executives: employees:
	<ul> <li>with managerial duties and responsibilities, without being part of the General Management or a member of the Management Committee, or being a site Manager; or</li> </ul>
	• with the status of cadre (executive) under French law.
	Managers: Managers are executives belonging to the General Management or members of the Rubis Énergie or Rubis Terminal Management Committee, Managers of subsidiaries and site Managers and the executives that report directly to them.
Absenteeism	Percentage of days missed (all categories of absence combined) as a percentage of total working days per annum.
	Note:
	<ul> <li>parental leave is not included in the calculation of absenteeism;</li> </ul>
	• days worked (as opposed to working days) are taken into account in calculating the rate of absenteeism;
	<ul> <li>the expression "all categories combined" includes unauthorized absences, absences due to non-occupational accident or illness and absences due to accident at work or occupational illness.</li> </ul>
Frequency rate of accidents at work	Number of accidents affecting an employee of a Group entity, with lost time of more than one day, occurring in the reporting period in question, per million hours worked.
Shift work	Shift work is defined by Directive 2003/88/EC as: "any method of organizing work in shifts whereby workers [here, the employees of a Group entity] succeed each other at the same workstations according to a certain pattern, including a rotating pattern, and which may be continuous or discontinuous, entailing the need for workers to work at different times over a given period of days or weeks" (Article 2 of Directive 2003/88/EC).
2) Environmental information	
Volatile Organic Compounds (VOCs)	<b>Organic compounds:</b> any compounds containing at least the element carbon and one or more of the following: hydrogen, halogen, oxygen, sulfur, phosphorus, silicon or nitrogen, with the exception of carbon oxides and inorganic carbonates and bicarbonates (Article 3 of Directive 2010/75/EU).
	<b>VOC:</b> any organic compound as well as the fraction of creosote, having, at 293.15 K, a vapor pressure of

**VOC:** any organic compound as well as the fraction of creosote, having, at 293.15 K, a vapor pressure of 0.01 kPa or more, or having a corresponding volatility under the particular conditions of use (Article 3 of Directive 2010/75/EU).

#### **Rubis Terminal:**

Consolidated VOC emissions are those reported in respect of the year (with a one-year lag) on all French sites and on the Antwerp, Rotterdam and Dörtyol (Turkey) sites.

#### Rubis Énergie:

Consolidated VOC emissions are those reported in respect of the year (with a one-year lag) on all French sites subject to a reporting requirement under the regulations in force. In the Rubis Énergie refining activity, measurements of VOC emissions are the subject of a biennial sniffing campaign conducted by an accredited independent body.



Terms	Definitions
Energy consumption	There is no imperative legal definition in this regard.
	Rubis Terminal:
	The data are the sum of the quantities of automotive or heating fuels or electricity purchased, converted into GJ, with the exception of fuel used by administrative staff (headquarters and site management) for transportation.
	Rubis Énergie:
	The Rubis Énergie distribution activities are for the most part not energy-intensive. They therefore do not require that an overall measuring system be set up at division level. In the Rubis Énergie refining activity, the refinery uses part of the crude oil stored to produce energy (electricity and vapors). An internal database monitors the site's real-time power generation and consumption.
Hazardous waste	Any substance or object that the holder discards, or intends or is required to discard, as defined for the French and/or European sites in Article R. 541-8 of the French Environmental Code and Annex III of Directive 2008/98/EC.
	Rubis Terminal:
	The amounts of waste are those reported in respect of the year (with a one-year lag) on all French sites and on the Antwerp, Rotterdam and Dörtyol (Turkey) sites.
	Rubis Énergie:
	Most distribution activities (Rubis Energie) do not produce hazardous waste. They are not as such required to demonstrate the establishment of an overall measuring system at divisional level. In the Rubis Énergie refining activity, waste amounts to the values declared during the year (time lag of one year).
Carbon dioxide (CO₂)	Please refer to the standard scientific definition of $CO_2$ .
	Rubis Terminal:
	$CO_2$ emissions are calculated as follows: the amount of automotive or heating fuels purchased on all sites is broken down by type, converted into energy (GJ) and then converted into $CO_2$ , by applying a conversion factor (kg/CO <sub>2</sub> /GJ). $CO_2$ emissions generated by the transportation of personnel are included. $CO_2$ emissions corresponding to the electricity consumption of the operating sites are included by taking the values indicated by distributors, or, failing that, by using national values.
	Rubis Énergie:
	Most Rubis Energie distribution activities do not produce waste. They therefore do not require that an overall measuring system be set up at division level. In the Rubis Energie refining activity, CO <sub>2</sub> emissions are evaluated by the refinery's laboratory, in accordance with a standard calculation method (quantity of fuel consumed x emission factor x oxidation factor) audited annually by an independent audit firm.
Sulfur dioxide (SO₂)	$SO_2$ emissions are monitored in the Rubis Énergie refining activity. Such emissions are evaluated through a calculation file by the refinery's Production Technical Office. The flow of $SO_2$ is in turn calculated based on the fuel source (based on the reconciled materials balance) and sulfur content of the fuels analyzed by the refinery's laboratory. The $SO_2$ concentration is deduced on the basis of the gas volume calculated using the net calorific value (NCV) of each fuel. The calculation is checked annually by an accredited independent body.
Water used	This is standing water (e.g. reservoirs and lakes) or running water (e.g. rivers) above ground, seawater, rainwater, underground water and water from the distribution network used in the activities of the Group entity. Discharged water is abstracted water, plus some rainwater.
	Rubis Terminal:
	The amounts of water abstracted or discharged are those reported in respect of the year (with a one-year lag) on all French sites and on the Antwerp, Rotterdam and Dörtyol (Turkey) sites.
	Rubis Énergie:
	Most Rubis Energie distribution operations do not require recurrent use of large quantities of water in industrial processes. In the Rubis Énergie refining activity, water consumption is measured on the basis of meter readings after a prorated calculation to December 31, 2017. The volume of water discharged corresponds to the value recorded by the meter at the exit of wastewater treatment.
Greenhouse gases (discharged)	<b>Greenhouse gases:</b> only carbon dioxide (CO <sub>2</sub> ) is assessed, as Group activities do not generally involve other greenhouse gases (Annex II of Directive 2003/87/EC).
	Rubis Terminal:
	The evaluation is based on the amount of energy purchased including electricity. The amount of CO <sub>2</sub> emitted is calculated based on the different types of fuel oil, fuel or electricity consumed, with the same exclusions as for energy consumption.
	Rubis Énergie:
	Rubis Énergie's distribution activities mainly emit only VOCs, which are not included in the European definition of greenhouse gases. In the Rubis Énergie refining activity, a monitoring plan has been developed to measure the emissions of greenhouse gas. It is based on methods for calculating CO <sub>2</sub> emission <sub>5</sub> (see definition).

Terms	Definitions
Suspended solids	These are particles suspended in water, the nature of which depends on the activities carried out on the polluted site.
	Rubis Terminal:
	Given the very broad scope of particles likely to come under the definition of suspended solids, Rubis Terminal retains only the compounds most representative of pollution that may be produced by the Company's main activities. Data for the French sites are the only values reported to authorities; in other cases the values are those established for Group reporting.
	Rubis Énergie:
	Rubis Énergie's regular activities generate little specific water pollution. In the Rubis Énergie refining activity, suspended solids are analyzed and evaluated by the laboratory of the refinery, then audited by a qualified independent body.
Nitrogen oxides (NO <sub>x</sub> )	Please refer to the standard scientific definition of $NO_x$ .
	Rubis Terminal:
	$NO_x$ is calculated based on consumption of fuel over the year, excluding electricity. The fuel used by administrative staff (headquarters and site management) when traveling is not taken into account. Concentrations of $NO_x$ in fumes are considered in the calculation as being equal to the highest permitted level of emissions or, in the absence of an upper limit, 150, 200, 300 or 550 mg/Nm <sup>3</sup> for boilers, depending on the fuel used, or 2 g/kWh for engines, in the absence of representative measurements.
	Rubis Énergie:
	To the best of our knowledge, Rubis Énergie's distribution activities do not produce any NO <sub>x</sub> . Therefore, an overall measuring system does not need to be set up at division level. In the Rubis Énergie refining activity, NO <sub>x</sub> emissions are evaluated through a calculation file by the refinery's Production Technical Office. This is an estimate based on the emission factor of each fuel and the operating time of the DeNO <sub>x</sub> combustion turbines. The calculation is audited annually by a qualified independent body.





## 5.5 **REPORT OF THE INDEPENDENT THIRD-PARTY VERIFICATION BODY** REGARDING CONSOLIDATED SOCIAL, ENVIRONMENTAL AND SOCIETAL INFORMATION CONTAINED IN THE MANAGEMENT REPORT

#### To the Shareholders,

In our capacity as independent third-party verification body, member of the Mazars network, the Statutory Auditors of Rubis, accredited by COFRAC Inspection under No. 3-1058 (scope available on the website at www.cofrac.fr), we hereby present our report on the consolidated social, environmental and societal information for the year ended December 31, 2017, presented in the management report (hereinafter the "CSR Information"), pursuant to Article L. 225-102-1 of the French Commercial Code (*Code de commerce*).

## **Responsibility of the Company**

It is the role of the Top Management to prepare a management report including the CSR Information referred to in Article R. 225-105-1 of the French Commercial Code, in accordance with the CSR reporting protocol used by the Company (hereinafter the "Framework"), as summarized in the management report and available on request at the Company's headquarters.

## Independence and quality control

Our independence is defined by regulatory requirements, the code of ethics of our profession (*code de déontologie*) and Article L. 822-11-3 of the French Commercial Code. We have also implemented a comprehensive quality control system including documented policies and procedures to ensure compliance with ethical requirements and prevailing legal and regulatory requirements.

## Responsibility of the independent third-party verification body

It is our role, on the basis of our work:

- to certify that the required CSR Information is presented in the management report or, if the CSR Information is not presented, that an appropriate explanation is given, pursuant to Article R. 225-105, paragraph 3 of the French Commercial Code (Certification of presentation of CSR Information);
- to express a conclusion of limited assurance that the required CSR Information, taken as a whole, is presented fairly in all material aspects, in accordance with the Framework (reasoned opinion on the fairness of the CSR Information).

It is not our role to express an opinion on compliance with any other legal provisions applicable, in particular those provided for by Law No. 2016-1691 of December 9, 2016, known as Sapin 2 (anti-corruption).

Our CSR audit was carried out by a team of 5 people between mid-January and mid-April 2018, over a period of approximately 5 weeks.

We conducted the work described below in accordance with the decree of May 13, 2013 determining the conditions under which the independent third-party body conducts its engagement, the professional guidance of the National Institute of Statutory Auditors relating to this type of engagement, and, as regards the reasoned opinion of fairness, with international standard ISAE 3000<sup>(1)</sup>.

## CERTIFICATION OF PRESENTATION OF CSR INFORMATION

We reviewed, based on interviews with the heads of the departments concerned, the presentation of sustainable development guidelines based on the social and environmental consequences of the Company's activities and its societal commitments and, where appropriate, ensuing actions or programs.

We compared the CSR Information presented in the management report with the list provided for by Article R. 225-105-1 of the French Commercial Code.

Where certain consolidated information was not presented, we verified that an appropriate explanation was given, in accordance with Article R. 225-105, paragraph 3 of the French Commercial Code.

We have verified that the CSR Information covered the consolidated scope, *i.e.* the Company and its subsidiaries within the meaning of Article L. 233-1 and the companies which it controls within the meaning of Article L. 233-3 of the French Commercial Code within the limits specified in the methodological note presented in the management report paragraph entitled "Cross-reference table and methodological note".

On the basis of this work and given the limits mentioned above, we hereby certify that the management report contains the required CSR Information.

(1) ISAE 3000 – Assurance engagements other than audits or reviews of historical financial information.

## II. REASONED OPINION ON THE FAIRNESS OF THE CSR INFORMATION

#### Nature and scope of our work

We conducted approximately 15 interviews with the people responsible for preparing the CSR Information in the departments overseeing the procedures for collecting information and, as necessary, the managers of internal control and risk management procedures, in order to:

- assess the appropriateness of the Framework with respect to its relevance, comprehensiveness, reliability, neutrality and intelligibility, taking best industry practice into account where applicable;
- verify the implementation of a process for collecting, compiling, processing and checking the completeness and consistency of the CSR Information, and obtaining an understanding of the internal control and risk management procedures relating to the preparation of the CSR Information.

We determined the nature and scope of our tests and inspections on the basis of the nature and importance of the CSR Information having regard to the Company's characteristics, the social and environmental challenges of its business, its guidelines on sustainable development and best practice in the industry.

For the CSR Information we considered the most important<sup>(1)</sup> :

- at the CSR management level, we consulted documentary sources and conducted interviews to corroborate the qualitative information (organization, policies and initiatives), analyzed the quantitative information, verified the calculation and consolidation of figures using sampling techniques, and verified its consistency and uniformity with the other information contained in the management report;
- we selected a representative sample of entities<sup>(2)</sup> on the basis of their activity and contribution to the consolidated indicators, their location
  and risk analysis, we conducted interviews to verify the correct application of procedures, and implemented detailed tests on a sample
  basis, checking calculations and reconciling justifying documents. The sample selected in this manner represents 30% of the workforce,
  considered a representative sample of the employee relations component and 52% of energy consumption, considered as characteristic
  of the environmental component.

We assessed the consistency of other consolidated CSR Information on the basis of our knowledge of the Company.

Lastly, we assessed the pertinence of the explanations, if any, that were given for the total or partial absence of certain information.

We believe that the sampling methods and sample sizes we used, exercising our professional judgment, allow us to formulate a limited assurance opinion. A higher level of assurance would have required a more extensive review. Because of the use of sampling techniques, as well as other limits inherent in the operation of any information and internal control system, the risk of failing to detect a material misstatement in the CSR Information cannot be entirely eliminated.

### Conclusion

Based on this work, we did not identify any material misstatements liable to call into question the fact that the CSR information as a whole is presented fairly, in accordance with the Framework.

Courbevoie, April 24, 2018

The independent third-party verification body

MAZARS

Edwige Rey

CSR & Sustainable Development Partner

(1) Employee relations: total headcount at the end of the period, percentage of women hired, rate of absenteeism, number of hours of training, frequency rate of accidents at work.
 Environmental information: energy consumption.

(2) Rubis Terminal France, Société Anonyme de la Raffinerie des Antilles, Ringardas Nigeria Ltd, Rubis Terminal BV Rotterdam.

