



CSR AND NON-FINANCIAL INFORMATION STATEMENT

Extract from the 2019
Universal Registration Document



Contents



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DPEF Non-Financial Information Statement.



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 NON-FINANCIAL RISK MANAGEMENT.

RUBIS BELIEVES THAT INVOLVING MANAGEMENT AT ALL LEVELS OF THE ORGANIZATION IN CSR ISSUES IS KEY TO ENSURING THE SUSTAINABILITY OF ITS ACTIVITIES (SEE SECTION 1.1). TO FOCUS ITS EFFORTS, THE GROUP CONDUCTED A RISK ASSESSMENT WHICH IDENTIFIED THE 13 RISKS MOST SIGNIFICANT FOR ITS ACTIVITIES (SEE SECTION 1.2).

THESE RISKS REVOLVE AROUND 4 PRIORITY ISSUES THAT UNDERPIN THE GROUP'S CSR APPROACH:

- **LIMITING THE ENVIRONMENTAL IMPACT OF ITS ACTIVITIES** (SECTION 2.2);
- **OPERATING IN A SAFE ENVIRONMENT** (SECTION 2.3);
- **ATTRACTING, DEVELOPING AND RETAINING TALENTS** (SECTION 3);
- **OPERATING RESPONSIBLY AND WITH INTEGRITY** (SECTION 4).

1

Non-Financial Information Statement

In accordance with European Directive 2014/95/EU transposed by order No. 2017-1180 and implementing decree No. 2017-1265, in this section Rubis publishes its Non-Financial Information Statement (*Déclaration de Performance Extra-Financière-DPEF*) presenting the principal risks relating to its activities. Detailed information on these risks appears in sections 2 to 4.

1.1 A SUSTAINABLE GROWTH MODEL

A computer graphic showing Rubis' **business model** can be seen in chapter 1, section 1.2 of this document.

1.1.1 **BUSINESSES ORGANIZED INTO 3 DIVISIONS**

As an independent player in the downstream petroleum and chemicals industry, operating in some 40 countries across Europe, the Caribbean and Africa, Rubis is structured around 3 divisions:

- the **storage of liquids** (petroleum and chemical products, fertilizers, edible oils and molasses) on behalf of a diversified industrial client base (Rubis Terminal);
- the **distribution of petroleum products** (fuels, LPG and bitumen) (Rubis Énergie);
- the **support and services activity**, in support of the distribution activity: refining, trading-supply and shipping (Rubis Énergie).

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.

1.1.2 **EMPOWERMENT AND FREEDOM OF INITIATIVE: PEOPLE AT THE HEART OF THE ORGANIZATION**

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.

In the countries where it operates, the Group aims to act with professionalism and integrity. This requirement safeguards against any wrongdoing that could be harmful to the Group, to employees, to business relations or to any other external public or private stakeholder, and is reflected in the following principles, details of which are contained in the **Rubis Group Code of Ethics** (see section 4.1):

- compliance with current legislation and regulations;
- promotion of safety and respect for the environment;
- respect for individuals;

- rejection of all forms of corruption;
- prevention of conflicts of interest and insider trading;
- compliance with competition rules.

1.1.3 **AN INVOLVED MANAGEMENT, AWARE OF ETHICAL, SOCIAL AND ENVIRONMENTAL RISKS**

The CSR policy implemented by the subsidiaries is overseen by Rubis' Management. A portion of the Managing General Partners variable compensation is linked to ethical, social and environmental criteria (see chapter 5, section 5.5.1.1.3), which are also included in guidelines for Senior Managers of subsidiaries.

Rubis' 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, finance, operations, HSE, HR 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 5, section 5.3.7.1).

1.2 THE MAIN CSR RISKS ASSOCIATED WITH THE GROUP'S ACTIVITIES

Health, safety and the environment are, historically, the Group's 3 main priorities. In accordance with Articles L. 225-102-1 and R. 225-105 of the amended French Commercial Code, Rubis conducted a new 3-stage analysis of its main non-financial risks (section 1.2.1), which identified 13 main risks around 4 priority issues (section 1.2.2).

1.2.1 A 3-STAGE RISK ANALYSIS

RISK MAPPING ANALYSIS

Risk maps are compiled locally by the Group's functional departments, analyzed at a consolidated level and then reported back to Rubis' Managing General Partners and presented to the Accounts and Risk Monitoring Committee. They are used to assess (impact and probability) risks likely

to have a significant adverse impact on the Group's business, financial position, reputation or outlook, on a scale of 1 to 5. These risk maps are updated annually in line with changes in the Group's business lines and operations, as well as the observations of employees, stakeholders and the Accounts and Risk Monitoring Committee (see chapter 3, section 3.2.3.2). This process is part of a **co-construction approach** aimed at achieving a shared diagnosis.

ANNUAL RISK MAPPING PROCESS

1. GUIDELINES

The Group's functional departments come together to assess the appropriateness of the risk mapping in response to the issue identified by the Group and by stakeholders.

2. DISSEMINATION

The risk mapping is sent to the Group's site managers, accompanied by explanatory notes.

3. LOCAL ANALYSIS

Each site assesses its exposure to the risks listed in the mapping and details the measures taken to prevent or deal with the risks.

5. RISK REVIEW

Rubis' Managing General Partners present a review of the risks and corrective measures taken to the Accounts and Risk Monitoring Committee and to the Statutory Auditors. This review then leads to discussion between Management and the Committee and the findings of its work are presented to the Supervisory Board.

4. CONSOLIDATED ANALYSIS

The Group's functional departments assess the materiality of each risk identified at consolidated level, based on the mapping completed by all sites.



ANALYSIS OF SEGMENT RISK

In addition to analyzing pre-existing risk mapping, Rubis' CSR teams use work carried out by other companies and trade organizations to check the consistency of the elements of risk identified by their risk mapping (stage one) and to add to the risk map if necessary.

Existing frameworks (the SASB Materiality Map® in particular), segment benchmarks (IPIECA) or those of trade organizations (Medef, ORSE, C3D) and CSR publications from other companies were used to assess the most material risks to which the business segment is exposed.

The concerns of stakeholders (NGOs, ESG analysts) were also analyzed to weight the risk analysis and to take into consideration the importance of these risks to them.

RUBIS' MAJOR STAKEHOLDERS



REGULAR DIALOG WITH 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 4.2).

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 and education (see section 4.2.3).

MULTIDISCIPLINARY WORK MEETINGS WITH DIVISIONAL MANAGERS

The consolidated result of risk mapping, revised for the benchmark described above, was presented to HSE Managers (environment and safety components) and to officers responsible for social issues (personal safety and HR) from each divisional holding company, for review and validation from a non-financial perspective. This review was the subject of regular meetings

and dialog between Rubis SCA and the divisions between June and December 2018. All the topics raised by the Grenelle II law and addressed in previous years' Registration Documents were reassessed to see whether or not they constituted "principal risks" within the meaning of European Directive 2014/95/EU.

The result of this risk analysis was validated by General Management in each division,

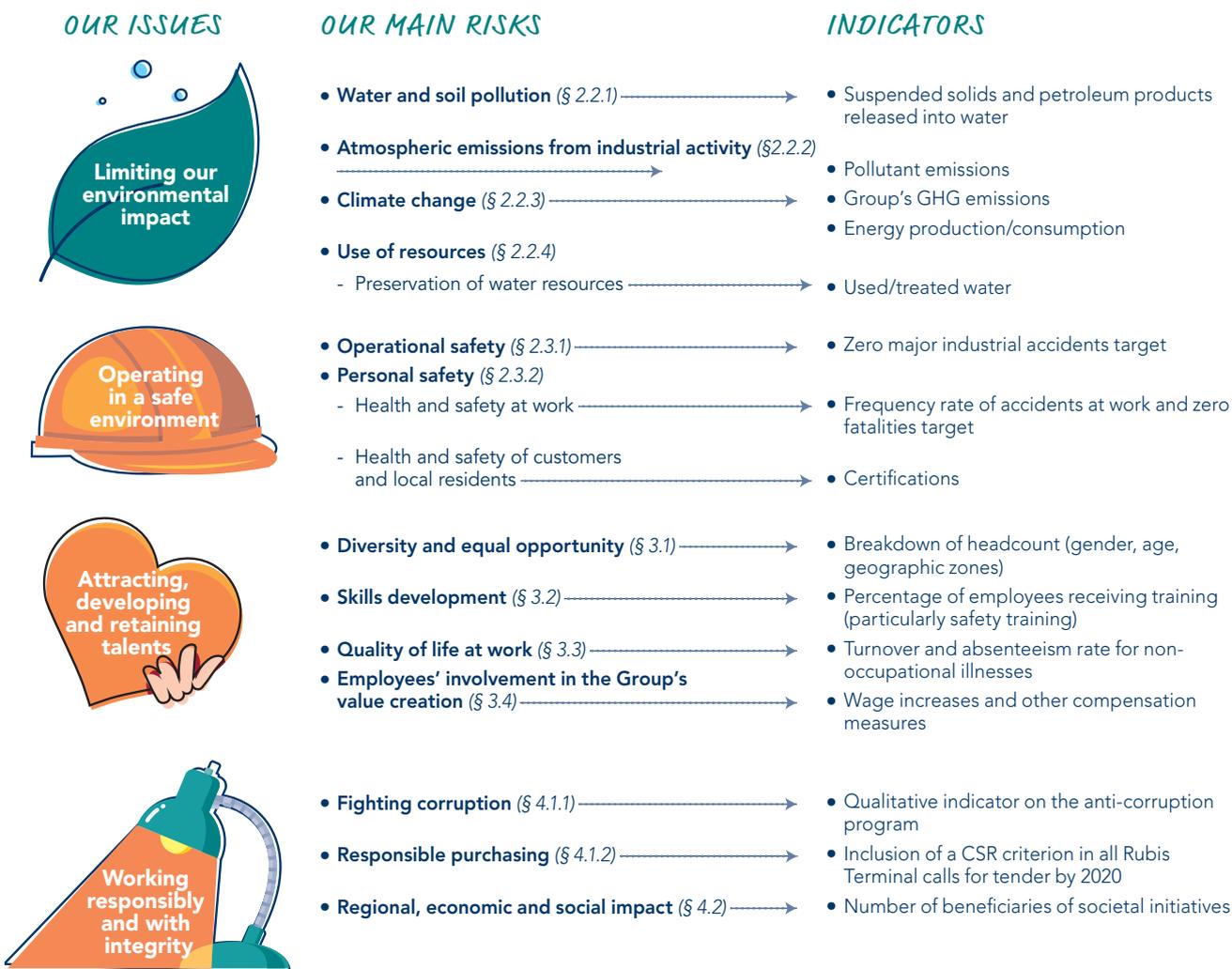
then validated by Management and the Risk Monitoring Committee.

In 2019, the 12 CSR risks identified in 2018 were once again reviewed to ensure that the analysis conducted in 2018 was still relevant. It was nevertheless decided to dissociate air discharges from climate change, hence the presentation of 13 risks, yet without introducing any new ones.

1.2.2 THIRTEEN RISKS REVOLVING AROUND 4 KEY ISSUES

The Group's CSR risk analysis identified 13 main risks revolving around the following 4 issues:

- limiting the **environmental impact** of activities;
- protecting the **health and safety of people** working on the sites, as well as local residents, and the **safety of the facilities**;
- attracting, developing and retaining **talents**;
- **business ethics** by operating responsibly and with integrity.



A RISK PREVENTION POLICY SPECIFIC TO THE GROUP'S ACTIVITIES

The Group puts procedures in place that are specially designed to deal with the issues identified by the risk analysis.

Health and safety risks for individuals operating on the sites and local residents, as well as risks relating to the environmental impact of the activities, are subject to enhanced preventive measures, implemented under major investment programs (see section 2).

Social risks are managed locally, in line with Group values, to make the most of human capital and recognize the specific nature of the Group's activities. In addition to health and safety at work, which are Rubis' priorities as an industrial group, the issues of well-being at work, equal opportunities in the workplace and the sharing of the Group's growth with employees are carefully monitored (see section 3).

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 4).

Details of the main risks relating to the non-financial information statement, as well as to related policies and indicators, appear in sections 2 to 4 of this document. The main risks are identified in the pictogram below:

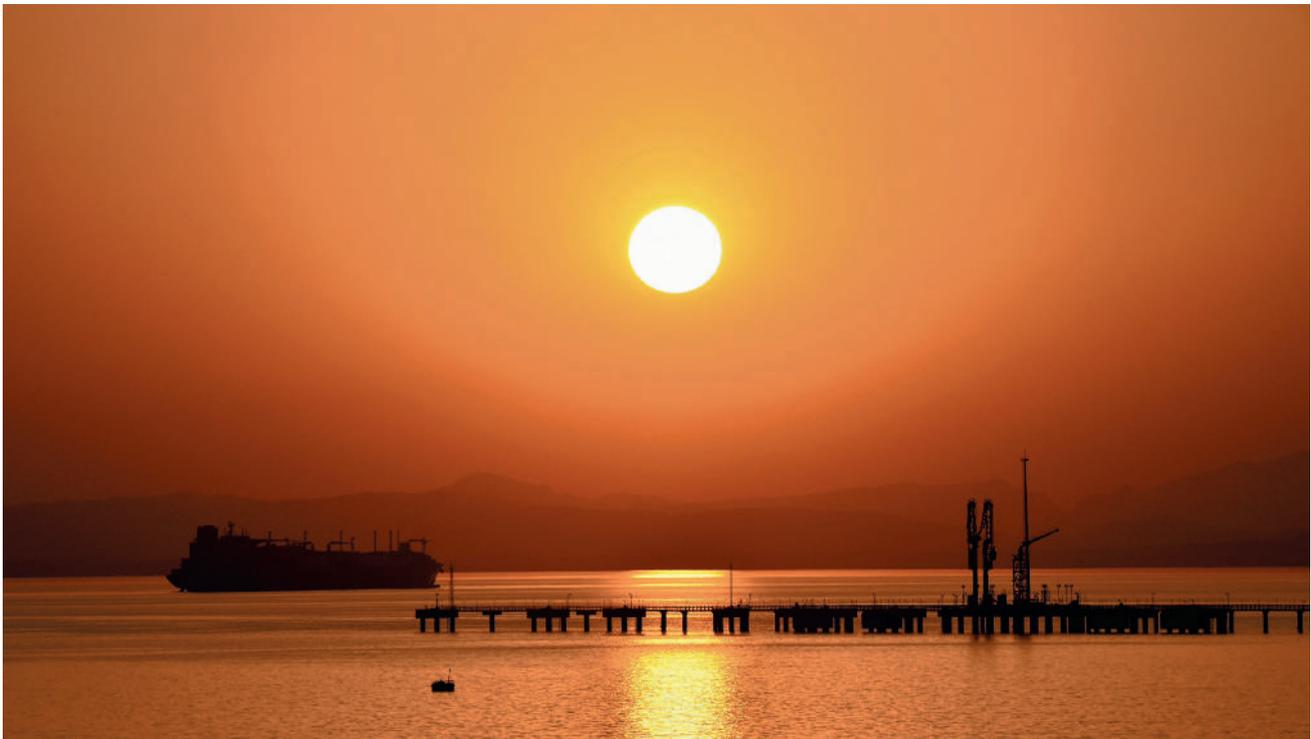
NFIS. Other risks, which were not identified as a priority during the risk analysis, but which are, however, considered to be significant, both for the Group and for its stakeholders, or which should be disclosed in accordance with current regulations, also appear in sections 2 to 4.

1.3 COMPARABILITY, RELIABILITY AND CHECKING OF SOCIAL AND ENVIRONMENTAL 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).

The information reported is checked as part of verification procedures and analyses. Internal audits relating to certain non-financial 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.



2

Limiting our environmental impact and operating in a safe environment

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 continuously to protect its environment (section 2.2), and seeks to operate in complete safety (section 2.3). To manage this quality, health, safety and environmental approach, the Group has defined a general framework and a specific governance structure to be implemented for each activity (section 2.1).

2.1 OUR QHSE APPROACH

2.1.1 GENERAL PRINCIPLES

The Group has defined a general framework for quality, health, safety and the environment (QHSE) to prevent risks and limit the negative impacts of its activity.

The QHSE policy framework, referred to in Rubis' Code of Ethics, 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 by all parties** (colleagues, suppliers, external service providers, etc.). This common framework is shared by all Group activities.

Each business division has drafted its own QHSE policy, in line with the general principles set out by Rubis, so that issues and risks that are specific to Rubis Énergie on the one hand, and Rubis Terminal on the other, can be taken into consideration. The business divisions have set up specific governance structures to implement these policies, clarifying the Group's principles by translating them into operational requirements.

The main objective of these QHSE policies is to **prevent risks so as to better protect physical and environmental integrity and minimize the impacts of a major accident** (see section 2.3). This is reflected in the implementation of the measures required to limit incidents as far as possible and thereby

reduce the probability of a severe event occurring. In addition, the Group is also keen to **mitigate its environmental footprint** (see section 2.2).

2.1.2 MANAGEMENT SYSTEM

OVERSIGHT OF RISK MANAGEMENT

The implementation of QHSE policies is overseen by facility Managers, assisted by the Rubis Énergie and Rubis Terminal Industrial, Technical and HSE Departments. At larger sites, quality and/or HSE engineers are also involved in this approach. 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 division, in the presence of Rubis Management.

Rubis Terminal (storage activity)

Rubis Terminal has circulated a document to all its subsidiaries setting out "the principles of Rubis Terminal's safety culture."

These principles point out, through the commitments given by Rubis Terminal Management, that:

- **safety is one of the Group's core values** and must be shared, on a personal level, by all employees;
- **senior Managers are responsible** for staff safety and must be held accountable.

Rubis Terminal considers that protecting health and safety contributes 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 Rubis Terminal industrial site 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 to health and safety.

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

Lastly, Rubis Terminal has committed to a costed multi-year program to reduce its energy consumption and its CO₂ and atmospheric emissions, by circulating a document entitled "Group targets for environmental impacts and energy consumption" to limit its environmental footprint. The document sets out objectives for reducing greenhouse gas emissions, energy and water consumption, and waste management in the years to 2020.

Rubis Énergie (distribution and support and services activity)

As Rubis Énergie also considers it vital to ensure the health and safety of people and property located in or nearby its facilities, it has established a **Health, Safety and Environment (HSE) Charter, which requires its affiliated companies to comply with HSE objectives considered fundamental**, sometimes over and above regulations in force locally, as a means of preserving the safety of people and property and to heighten employee awareness on these issues.

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

- spread Rubis Énergie’s fundamental HSE principles among subsidiaries to create and strengthen the HSE culture;
- implement the industry’s best business 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 lessons learned documents;
- regularly train employees and raise their awareness of technological risks.

COMPLYING WITH PROFESSIONAL AND INDUSTRY STANDARDS

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

- **taking care to analyze the state of the facilities in the light of specific Group standards and local regulations** and, if necessary, scheduling work to bring them up to standard;
- **monitoring of programs such as HACCP or GMP+** (see table hereafter), 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 Rubis Terminal’s chemical product storage depots, **joining the Chemical Distribution Institute-Terminals (CDI-T)**, a non-profit foundation working to improve the safety of industrial sites in the chemicals industry;
- **joining the GESIP (Groupe d’Étude de Sécurité des Industries Pétrolières – Group for Safety Research in the Petroleum Industries)**, in order to share feedback between the relevant Rubis Énergie and Rubis Terminal entities and implement industry best practices;
- **joining the professional aviation groups/ associations JIG and IATA and signature of a Shell Aviation technical support agreement**, with the goal of accessing expertise in the reception, storage and transfer of aircraft fuel and in aircraft fueling operations at airports for the relevant Rubis Énergie entities;
- **joining Oil Spill Response Ltd**, a company that assists in the event of any maritime pollution that may occur during loading/unloading operations in Rubis Énergie terminals.

SITE CERTIFICATION

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

CERTIFICATIONS OBTAINED BY GROUP ENTITIES



All Rubis Terminal depots (excluding Corsica) and certain Rubis Énergie distribution or industrial activities (Vitogaz France, Sigalnor, SARA, Lasfargaz, Rubis Energia Portugal, Vitogaz Switzerland and Easigas) are ISO 9001 (**quality management system**) certified.



Certain French and international Rubis Terminal depots and the activities of SARA (refinery), Vitogaz Switzerland, Galana and Rubis Energia Portugal (distribution) have ISO 14001 (environmental management system) certification. This standard provides a framework to control the **environmental impacts** caused and is designed to ensure the **continuous improvement of its environmental performance**.



Rubis Terminal’s Dörtyol site (Turkey) and Vitogaz Switzerland, Galana and Rubis Energia Portugal activities are ISO 18001 (**health and safety at work management system**) certified.



For the Rubis Terminal chemical product depots (Chemical Distribution Institute - Terminals). The CDI is responsible for **inspections and audits relating to the global chemical product supply chain**, specific to transport and storage.



The Rubis Terminal Dunkerque site has an ongoing risk management policy for the **storage of foodstuffs**. Employees are trained in best practices through the analysis of food risks. They apply the principles of this approach, known as HACCP, and know how to meet the particular needs of the food sector, such as product traceability throughout the logistics chain. In addition, the terminal has declared that it stores products used for animal feed. This business has been registered with the DDPP (Direction Départementale de la Protection des Populations – Regional Directorate for the Protection of Populations). Lastly, this site is preparing to obtain GMP+ B3 certification for the transshipment and storage of liquids used for animal feed.



Vitogaz France has held NF Service Relation Client (NF345) certification since 2015. It was the first French company to obtain certification in the new version 8, in December 2018. Revised in 2018, **NF Service Relation Client** certification is based on international standards ISO 18295-1 & 2. A guide to best practice in **customer relationship management**, it takes due account of **customer expectations** and aims to guarantee constant improvements to service quality. For Vitogaz France, this **promotion of excellence in the customer experience** should help establish a long-lasting commercial relationship, deliver quality service over time, ensure that information transmitted is complete and clear, and act promptly to meet its commitments.



2.2 LIMITING OUR ENVIRONMENTAL IMPACT

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

THREE DIVISIONS WITH SPECIFIC ENVIRONMENTAL IMPACTS

Rubis' business lines are organized into 3 divisions: storage, distribution, and support and services. These entail industrial risks depending on the nature of the products handled (petroleum products, LPG, bitumen, chemical and agrifood products), each of which has environmental impacts of very different natures and scales. These risks are detailed at the beginning of each part in this section.

The environmental impact of **Rubis Terminal's storage** activity is due to the size of the depots (and the quantity of products being stored and transferred there) and the nature of some of the products being handled, which require energy-intensive facilities (boilers, for example).

The environmental impact of **Rubis Énergie's distribution** activities (LPG, fuel: gasoline, diesel, kerosene, fuel oil, etc.) arises mainly from the risk of accidental product spillages or leaks from several small sites (storage depots, gas stations, LPG cylinder filling plant, customer facilities, aviation or marine refueling facilities) that are generally smaller than Rubis Terminal sites.

Lastly, the environmental impact of **Rubis Énergie's support and services** activity mainly stems from the refinery in the French Antilles (SARA) and is the result of industrial processing, and shipping.

MEASURES LIMITING THE GROUP'S ENVIRONMENTAL IMPACT

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

- **prevent water and soil pollution** likely to be caused by accidental product spillages (section 2.2.1);
- **assess and limit atmospheric emissions from industrial activity** (section 2.2.2);
- **contribute to combating climate change** (see section 2.2.3 which presents the Bilan Carbone® of the Group's activities, in particular);

- **optimize the use of resources** by protecting water resources (section 2.2.4.1).

Another risk that the Group does not consider to be a priority in terms of its activities, but which is nevertheless significant, is that of waste management (section 2.2.4.2).

2.2.1 WATER AND SOIL POLLUTION

The risks of contamination of water and soil related to the Group's operations result mainly from accidental spillages of stored and/or transported products, which at some sites may result from activities preceding the Group's presence. Broadly speaking, the Group gradually invests on sites to improve the safety of its facilities and to eliminate the risk of pollution as much as possible.

STORAGE ACTIVITY

Risks

The storage activity may generate accidental water and soil pollution, in particular as a result of bulk tank overflows, spillage, bulk tank and/or pipe leaks, and discharges into residual water.

Measures to prevent and contain pollution

Tanks containing hazardous products, and associated pipework, undergo systematic inspections at storage sites in accordance with international standards during regular mandatory on-site visits. Moreover, to prevent groundwater and soil pollution in the event of accidental spillage, storage tanks are (with some exceptions) 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 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.

DISTRIBUTION OF PETROLEUM PRODUCTS ACTIVITY

Risks

The petroleum products distribution activity is also concerned, albeit to a lesser extent due to the smaller quantities of products stored in the sites operated compared to Rubis Terminal, by the risk of accidental fuel spills or leaks in the pipeworks or tanks (in fuel depots, gas stations and customer installations). Road haulage of products, which is necessary to supply distribution sites and customers (automotive fuel, bitumen) is also liable to result in accidental spills.

Measures to prevent and contain pollution

Tanks containing hazardous products, and associated pipework, undergo systematic inspections at storage sites in accordance with international standards during regular mandatory on-site visits, generally once every 10 years. Moreover, to prevent groundwater and soil pollution in the event of accidental spillage, storage tanks are often installed in watertight retention basins lined with concrete. These basins are kept shut. They are only opened for emptying 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. Groundwater is tested at discharge points every quarter.

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 solidity and water proofness), 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. The medium-term (2027) objective is to replace single-wall tanks that are more than 30 years old. The regions most affected by this measure are the Bahamas, Jamaica, the West Indies, Haiti and East Africa. By way of example, the tanks of 6 gas stations are due for replacement in 2020 in the Caribbean zone, representing an overall investment of approximately US\$3 million.





TAKEOVER OF THE REICHSTETT SITE

In early 2013, Wagram Terminal, a Rubis Terminal subsidiary, took over the storage assets of the Reichstett refinery, namely a 113-hectare site, 3 pipelines and a second storage site at the port of Strasbourg. The complex contained nearly 200,000 m³ of products constituting strategic automotive and heating fuel reserves for the region. A major upgrading and transformation project was then started, which lasted several years. At the same time, one of the largest national projects was undertaken there to secure the facilities that were to be permanently shut down, drain all polluting liquid products, remove asbestos, and clean up the soil and groundwater.



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Let's look back at this adventure, because this is how Wagram Terminal, in partnership with Brownfields (a specialist in industrial site conversion), managed to secure a promising future for the entire site.



First of all, the tanks were internally inspected and repaired, then fitted with motorized valves and electronic gauges. Drawing on the experience of other automated depots, we transformed this manual site into an automated terminal. This allows us to receive different products by pipeline directly into the tanks on a 24/7 basis. In the control room, measurements taken by certified gauges show readings, also certified, which mean that customs agents no longer have to climb the tanks to take manual readings.

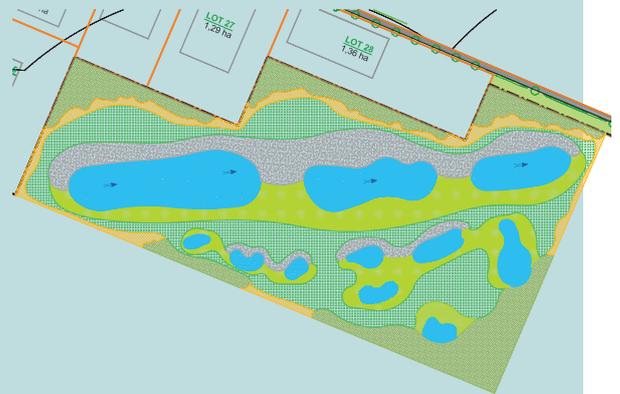
In addition, the fire defense network has been equipped to remotely control all fire defense scenarios in a very short period of time, without human intervention. The electrical distribution system, now separate from the refinery, was renewed and the 65 kV substation was replaced by a more suitable 20 kV power supply.

The railway station was dismantled and completely rebuilt. It now offers unique development opportunities in the region, as a complement or alternative to transport via the Rhine River or by pipeline. A new wharf was also created at the port, which is connected to Reichstett by an automated pipeline.

Special attention has been paid to the environment. Previous concentrated soil and groundwater pollution has been removed and treated, and an *in situ* treatment zone has been started up again. We were able to discontinue an expensive groundwater lowering system after observing the positive effects on the quality of groundwater. A planted filter was built, forming an ecosystem to ensure the top quality of rainwater leaving the site. With respect to the watertight retention basins, a project limiting the addition of artificial materials will continue until 2030. As the old administrative building was unusable, a new low-energy modular building has been built.

We also created a 10-hectare environmental mitigation zone that has transformed an asbestos-contaminated and polluted area adjacent to our land into a sanctuary for fauna and flora. Today, we plan to develop this concept in the areas adjacent to our other terminals.

Taking over this site was a complex project. Our expertise and the unfailing commitment of the project and operations teams made it possible to carry out these transformations to an operating depot, without any labour disruption due to injury, either for our staff or our subcontractors. We now offer our customers 550,000 m³ of storage. The result is an environmentally-friendly solution opening up prospects that position this site at the forefront of Rubis Terminal's development in France.



G erard Lafite

Deputy General Manager Operations and Construction
Rubis Terminal

At the same time, Rubis  nergie is strengthening its preventive maintenance programs for this equipment (detailed in section 2.3.1), and is working continuously to improve the safety/environmental training of gas station managers, notably to ensure that they have the resources available to immediately detect any loss of product due to faulty equipment and/or improper practices or fraud.

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

Regarding the road haulage of petroleum products, in addition to the application of the

regulations applicable to the transportation of hazardous materials, additional measures are taken in order to prevent the risk of traffic accidents. Courses in defensive driving have thus been introduced in countries where this risk is heightened due to driving habits, distances or the poor quality of road infrastructure.



SUPPORT AND SERVICES ACTIVITY

Risks

Support and services activity (refining and shipping) could 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, draining), bulk tank drain water and ballast wastewater.

Moreover, shipping activity can generate risks of pollution during ship loading/

unloading operations or in the event of a shipping accident.

Measures to prevent and contain pollution

For vessel chartering, the Group calls on the services of a specialized company that systematically vets the vessels in question. This 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 the teams rely 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.

GROUP RESULTS

Water pollution

(in kg)	Suspended solids released into water*		Petroleum products released into water	
	2019	2018	2019	2018
Storage activity (Rubis Terminal)	3,618	2,495	380	357
Refining activity (Rubis Énergie – support and services)	2,587	3,338	454	476
Distribution activity (Rubis Énergie)	Not measured	Not measured	Not measured	Not measured

* Suspended solids released into water: see definition in section 5.3.

In the storage activity, the amount of suspended solids released into water is very low with respect to the volume of water used (more than 450,000 m³). As such, the change between 2018 and 2019 is not significant.

In the refining activity, the sharp improvement in suspended solids found in wastewater is due to the start-up of a new lamellar separator in early 2019.

Soil pollution

Storage

Four uncontained pollution incidents were reported in 2019 across all 24 sites, corresponding to an overall volume of 47 m³. The reported incidents correspond to pollution in excess of 200 liters in the course of one year.

Distribution/support and services

In accordance with professional practices, Rubis Énergie monitors accidental spillages of liquid petroleum products with a unit volume of more than 200 liters. In 2019, the subsidiaries reported 6 incidents (2 leaks, 2 road accidents involving trucks and 2 incidents at depots).

Any substantial spillage is followed by remedial action to restore an acceptable environment as soon as possible.



© BREEF

BREEF Foundation for the preservation of the Bahamian marine environment.

PROTECTING BIODIVERSITY

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 2.1).

The Group also has an active sponsorship and partnership policy with environmental protection associations. For example, Rubis Bahamas supports BREEF (Bahamas Reef Environment Educational Foundation), a Bahamian non-governmental, non-profit foundation which aims to raise the population’s awareness of the importance of, and the need to preserve, the Bahamian marine environment (see section 4.2.3).

2.2.2 ATMOSPHERIC EMISSIONS FROM INDUSTRIAL ACTIVITY NFIS

With the exception of refining in the French Antilles, the activities of Rubis Énergie are not classed as industrial transformation processes. Due to their size, Rubis Terminal storage sites are the other most significant contributor to air pollution within the Group. Rubis is committed to implementing a policy geared towards limiting these emissions.

To this end, the Group is progressively evaluating its various sources of air pollution. The Group's CO₂ emissions assessment (Bilan Carbone®) is reported in section 2.2.3 relating to climate change.

STORAGE ACTIVITY

Risks

The storage activity releases VOCs (Volatile Organic Compounds) from the surface of the products stored which, depending on their physico-chemical properties, may vaporize according to the storage and handling conditions.

Limitation measures

Gasoline vapors are collected in Rubis Terminal's French storage terminals and certain Rubis Énergie facilities (refining and certain depots) in France

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, fuel storage tanks are equipped with floating screens, and loading is performed through bottom-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.

Collection and treatment of VOCs in the chemical depots of Antwerp and Rotterdam

From their creation, both these sites were designed to collect and treat all VOC vapors occurring above liquids and pushed outside of the site's or vessel's tanks during transfers.

Reduction of energy consumption in storage terminals

As the energy consumed by the storage terminals is derived from the same source as the energy generating CO₂ (pumps and boilers), the actions taken by Rubis Terminal to reduce energy consumption on sites, in terms of both existing and new heating systems, are described hereafter (section 2.2.3).

DISTRIBUTION ACTIVITY

Risks

The distribution of petroleum products activity generates some VOC emissions, however these emissions remain relatively low.

In LPG distribution, VOC emissions are generated by connection/disconnection

operations when filling cylinders and trucks and degassing cylinders for technical inspections. Other VOCs are made up of the solvents contained in paints used for cylinders.

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.

The distribution activity does not emit significant volumes of NO_x.

Limitation measures

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



UNDERSTANDING AIR POLLUTANTS AND GREENHOUSE GASES

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

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

In its activities, the greenhouse gas released by Rubis is carbon dioxide (CO₂), which is measured (Bilan Carbone®) and subject to reduction measures (see section 2.2.3).



SUPPORT AND SERVICES ACTIVITY

Risks

The **refining activity** generates emissions into the air due to its industrial transformation processes. Emission sources include furnaces and combustion turbines, as well as boilers and flares.

The **shipping activity** generates SO₂ emissions, since the fuel used has a sulfur content of up to 3.5%.

Limitation measures

The continuous monitoring of the refinery's air emissions is strengthened by putting into service analyzers of dust and carbon

monoxide in the 2 units generating the highest emissions.

Every year, a refinery fume control campaign is carried out by a body authorized to approve the findings of our self-monitoring system (campaign carried out in December 2019).

For the shipping activity, since January 1, 2020, according to the instructions of the International Maritime Organization (IMO 2020), vessels will now use fuel with a sulfur content limited to 0.5%. Another option is to equip vessels with scrubbers to capture sulfur emissions by cleaning exhaust gas. Accordingly, these chimney evacuation filters

treat exhaust gas by eliminating up to 90% of sulfur dioxide (SO₂) and fine particles. Rubis has equipped one of its own vessels with a scrubber. The other fully-owned vessels, as well as those operated by the Group on a time-charter basis, now use fuel with a maximum sulfur content of 0.5%, which is widely available in the 3 zones of activity (Caribbean, Europe and Indian Ocean).

GROUP RESULTS

The nature and volume of emissions vary according to the activities and are presented in the table below.

(in tonnes)	NO _x emissions		VOC emissions		SO ₂ emissions	
	2019	2018	2019	2018	2019	2018
Storage activity (Rubis Terminal)	11	17	406	352	Not measured	Not measured
Refining activity (Rubis Énergie)	230	204	262	274	343	347

In storage sites, low figures in 2019 again showed the very limited NO_x impact of this activity. Regarding VOCs, the 15% increase recorded in 2019 for Rubis Terminal corresponds on the one hand to the final year of operation of an emission treatment system at the Rouen site, which has since been replaced with a more effective solution, and, on the other hand, at the same site, an increase in gasoline activity that has generated more VOC emissions.

In 2019, air emissions from the refining activity were stable compared with 2018.

2.2.3 CLIMATE CHANGE NFIS

Rubis is aware of the energy transition challenges facing its sector. The oil and gas sector plays a key role in terms of energy access, which is essential to meet the fundamental needs of people (traveling, heating and cooling, lighting, cooking) and to support their development. Nevertheless, even today, a large proportion of the population in many of the Group's operating regions (Africa in particular) is still deprived of access to energy.

Aware of changing expectations in society and the necessity of reducing global greenhouse gas emissions, Rubis intends to

support this energy transition by continuing to study and implement sustainable solutions. The Group must find a balance between the expectations of customers wanting to access affordable energy, and the necessity of helping to combat climate change by reducing CO₂ emissions related to its activities.

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

RISKS

This chapter focuses on the challenges related to the Group's carbon emissions. A more comprehensive description of climate change risks (in particular physical risk) is provided in chapter 3 "Risk factors", section 3.1.2.

In 2019, with the help of a firm certified by Ademe (the French Environment and Energy Management Agency), the Group conducted a comprehensive Bilan Carbone® assessment of its activities and products (see figures under Results in this section) in order to properly assess its carbon footprint and identify the most effective solutions available to reduce this footprint. The assessment was carried out in accordance with the methodology developed by Ademe, which is based on the recommendations of ISO 14064-1 and the GHG Protocol. This carbon accounting method records carbon emissions across 3 scopes:

- scope 1: direct emissions from the fixed or movable facilities located within the Company's organizational scope;
- scope 2: indirect emissions related to the production of electricity, heat and cold used;
- scope 3: other indirect emissions generated by third-party activities upstream or downstream from the Company's activities.

When we focus on the Rubis Group's operating emissions, i.e. excluding emissions related to the use of products sold, they come mainly from the transport of products distributed, by ship (146 kt, i.e. 34% of CO₂





LPG FUEL ON THE RISE

Although climate change has become a serious concern, the proposed solutions are not always feasible in the short term, nor are they always less damaging to the environment, such as electricity, sometimes generated by thermal power stations.

However, in our field of activity, we have an energy of transition that is immediately available and for which the technology has been proven for many years: LPG automotive fuel. In Europe, more than 15 million vehicles already use LPG, considered by the European Union as an "environmentally friendly alternative automotive fuel", thanks to its low CO₂ emissions and almost zero particulate emissions.

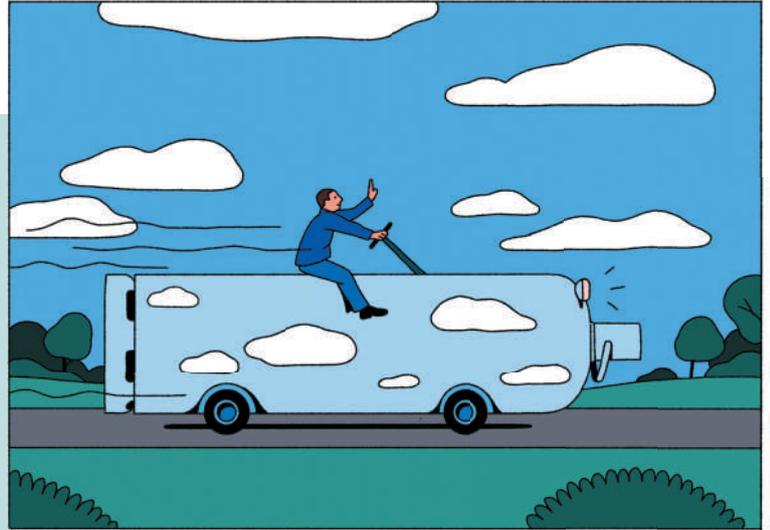
The Spanish market, which calls this automotive fuel *autogas*, has grown substantially since 2017 and annual LPG vehicle registrations increased from 4,500 in 2017 to 27,000 in 2019.

The country has a network of 700 gas stations distributing this "green" automotive fuel for a fleet of approximately 110,000 LPG vehicles. Major automotive manufacturers are already offering new models that run on LPG and many garages in Spain are also converting vehicles.

Vitogas España is present in this booming market and our sales have followed the trend, rising from 3,060 tonnes of LPG automotive fuel distributed in 2017 to 6,658 tonnes in 2019, an increase of 217%. We distribute *Autogas* by *Vitogas* in 200 gas stations and the development outlook is good for the next 3 years.

With an all-product volume of more than 60,000 tonnes distributed in 2019 on the Spanish market, *Vitogas*' market share increased by 11%.

In addition to the commercial success of *Vitogas España*, our teams are aware that we are contributing to the reduction of global warming in order to preserve our planet.



Manuel Ledesma
Chief Executive Officer
Vitogas España

emissions) and, to a lesser extent, from road haulage (72 kt, i.e. 16.9% of emissions), as well as from the energy consumption of industrial facilities (24% of CO₂ emissions, of which 85% comes from the Rubis Énergie refinery). In addition to refining (87 kt, Group share), which is an industrial transformation activity requiring energy consumption, the most significant volumes of energy are used by Rubis Terminal (third-party storage activity), which operates the Group's largest storage terminals that are equipped with boilers to maintain the temperature of certain products requiring hot storage. The energies used by the Group (electricity, steam, fuels) contribute to the smooth day-to-day operation of industrial facilities, including safety equipment (power-driven fire pumps, back-up generators, etc.).

Rubis Énergie (and Rubis Terminal, very marginally) distribute petroleum products that release CO₂ when used by the customer. This is the Group's most significant source of CO₂ emissions and accounts for nearly all scope 3 emissions, although in 2019, 51% of the gross margin came from sales of LPG and bitumen, products that emit less or no CO₂ during use. These emissions account for 96% of the Group's total emissions. For this reason the initiatives implemented by the subsidiaries to help users reduce these emissions are detailed first.

CARBON FOOTPRINT MANAGEMENT MEASURES

The measures taken by the Group to control and reduce the carbon footprint related to its

activities and thereby strengthen its climate resilience can be organized into 3 categories:

- measures to support and raise awareness among customers to reduce their emissions by consuming better and less are implemented by Rubis Énergie subsidiaries;
- the analysis of the energy consumption of facilities in order to optimize/reduce greenhouse gases (GHG) on a daily basis;
- sharing ideas to develop new projects and support the Group's future strategic directions in the medium and long term to better integrate climate issues.

At this stage, it has included a CO₂ emission reduction target for the Group's fixed and movable facilities (scopes 1 and 2) in the variable compensation criteria of the Management as from 2019.

MEASURES AIMED AT CONSUMERS

Aware that customer use of the fuels it distributes generates CO₂ emissions, Rubis Énergie implements initiatives aimed at encouraging consumers to make better use of these products in their day-to-day lives. The quantitative data regarding CO₂ emissions relating to customers' use of products sold by the Group are reported in the Bilan Carbone® table at the end of this section.

Supporting consumers in energy savings programs

Through Vitogaz France, Rubis Énergie conducts information and awareness-raising programs focusing on consumers' energy consumption patterns.

Since the introduction of the Energy Saving Certificate (ECS) system in July 2005, which aims to make energy savings in certain sectors (construction, small- and medium-scale industry, agriculture or transport), various energy-saving projects have been financed by Group entities, such as the installation of individual high-performance

boilers, the insulation of residential lofts, roofs and walls, the installation of solar water heaters in housing in French overseas departments, recovery of heat from high-powered industrial compressors, and so on.

At the same time, in order that the French overseas departments benefit from more of these actions, Rubis Énergie is directly involved in bids for programs to develop and finance more widespread energy-saving awareness-raising, information, training and measurement actions to be applied in their energy consumption and in their use of mobility services. Accordingly, in 2019, Rubis Énergie joined forces with EDF and Total to launch the implementation of a program extending beyond its regulatory obligation and expressing a proactive and local approach to contribute to energy-saving actions by becoming a player and not only a purchaser of certificates.

Promoting the use of LPG, a transition energy source in the distribution activity

Gas is a fossil fuel with lower greenhouse gas emissions. LPG is thus fully in line with the

energy transition by supporting the transition to a less carbon-intensive energy mix. A daily energy source on account of its domestic, industrial and automotive usages, which can be stored in liquid form and is easy to transport, LPG meets a wide range of energy requirements at competitive economic conditions.

Some 20 Rubis Énergie subsidiaries are positioned on the LPG distribution market (packaged and bulk) and encourage its use as a substitute for the most carbon-intensive energies, such as fuel oil for heating and wood or coal for cooking. In 2019, LPG accounted for nearly 23% of the product volume sold by Rubis Énergie.

Moreover, Vitogaz France, Vitogaz España (see inset previous page) and Vitogaz Switzerland encourage the use of automotive LPG. An LPG vehicle emits up to 20% less CO₂ compared with a gasoline vehicle, and practically no pollutants (particles, sulfur oxide SO₂ or nitrogen oxide NO_x) (see inset on pollutant emissions in section 2.2.2).



IN MADAGASCAR, VITOGAZ CONTRIBUTES TO THE FIGHT AGAINST DEFORESTATION

Deforestation in Madagascar is considered one of the most worrying cases in the world, threatening the country's unique biodiversity which comprises 90% endemic species. Nearly 45% of the island's natural forests have been destroyed in the last 60 years; at this rate, the Malagasy forest will have completely disappeared 30 years from now.

One of the causes of deforestation is the production of firewood and charcoal for cooking, with 90% of Malagasy households using this source of energy. Due to a lack of information, consumption patterns remain unchanged despite the environmental and health damage caused by coal. This energy does not have any real financial advantage, but can be purchased daily in small quantities.

In light of the deforestation disaster, Vitogaz Madagascar is making butane available to all. Since the end of 2018, a new concept has been launched in the city of Majunga, allowing domestic customers to buy gas in small quantities (from 500 g to 2.5 kg) and thus spread out their energy expenditure over the whole month. This sales scheme clearly addresses the issue of Malagasy consumers' purchasing power and allows those currently buying small bags of coal on a daily basis to switch to another energy source that is healthier and more environmentally friendly. Confident of the advantages of this new gas retailing scheme, Vitogaz decided to roll out this concept in Madagascar's capital, Antananarivo, in 4 Galana gas stations located in the city's most densely populated neighborhoods. Thanks to gas retailing, Vitogaz aims to reduce coal consumption in Madagascar and protect the country's forest cover.

Every year, 5,000 gas stoves are sold. Their use transfers energy consumption from coal to gas. Based on emission factors compiled by Ademe and the Food and Agriculture Organization of the United Nations, we have estimated that nearly 1,500 tCO₂ eq. of emissions are avoided per year for every 5,000 stoves replacing the use of coal. This figure takes into account only the replacement of the volume of coal by the volume of gas needed for equivalent use (and not the total emissions avoided as a result of reduced deforestation).

As such, in addition to combating deforestation in Madagascar, the use of gas instead of coal also reduces mortality due to air pollution in enclosed environments, in kitchens, affecting mainly women and children.

Vincent Fleury
Chief Executive Officer
Vitogaz Madagascar



SARA INVESTS IN THE FUTURE

For 50 years, the Société Anonyme de la Raffinerie des Antilles (SARA) has been producing and storing automotive and heating fuels for Martinique, Guadeloupe and French Guiana.

This essential and committed player employs more than 700 full-time staff, including 320 SARA employees and 380 subcontractors, and represents 10 to 15% of the territories' GDP.

Since 2016, major investments have been made to continue to ensure the refinery's main missions (energy independence and the creation of skilled local jobs) and to be part of the energy transition.

SARA is thus driving **highly innovative projects** that meet the expectations of the 3 territories (the development of local partnerships, societal responsibility and creation of skilled local jobs that cannot be relocated) and that have a positive impact on its carbon emissions, including:

- **renewable electricity production in Martinique with 2 major projects:**
 - > the development in 2018 of **the largest photovoltaic power plant in Martinique** with generation capacity of 5 MWp of green electricity,
 - > the commissioning in 2019 of **a fuel cell using green hydrogen** from the refining process, with generation capacity of 1 MW of electricity, a world first;
- **a sustainable development project in 2020:**
 - > production of industrial water from saltwater desalination and the recycling of purified discharges in order to reduce SARA's use of drinking water and reduce its footprint on the network.

In order to perpetuate this tool over the next few decades, a major refurbishment called "Arrêt métal 2020" (metal shutdown 2020) is scheduled for 2020 at a total cost of €55 million. In addition to guaranteeing the energy independence of the French Antilles and maintaining local jobs, this initiative is an opportunity to make major changes to best support the energy transition and improve the energy performance of this industrial facility.

In 2019, €36 million of investments have already been made, some directly related to the refinery's "core business" and others to reduce CO₂ emissions. As proof of its adaptability, since 2019 the bunkering produced for vessels has complied with the new International Maritime Organization (IMO 2020) regulations, which have required very low-sulfur fuels since January 1, 2020.

These investments will also have a direct impact on reducing the refinery's emissions, *i.e.* 4.6% of carbon emissions avoided. All "core business" projects and development projects as part of the energy transition have enabled SARA to reduce its emissions by 12% since 2015. SARA wants to continue its efforts to significantly reduce its carbon emissions by 2035.

Philippe Guy
Chief Executive Officer
SARA



ENERGY EFFICIENCY OF GROUP SITES

The Group makes significant efforts on a daily basis to reduce energy consumption in its industrial activities, optimize operating costs and reduce the climate change impact of its activities. Particular attention is paid to the most energy-intensive industrial sites. As energy consumption also results in air

emissions other than greenhouse gases, some of the measures described below are also aimed at reducing the pollutant emissions discussed in section 2.2.2.

Reduced energy consumption of heating systems

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 Énergie refinery (SARA) is also due to install a new boiler during the major shutdown scheduled for 2020, which will enable a 15% reduction in its emissions compared to the current boiler.

Heating systems at Rubis Terminal’s European storage sites

For heating systems already in place, the following actions are under way:

- installation of an economizer and replacement by a micro-modulating burner on a boiler in Dunkirk;
- switching to natural gas for the boilers at the Strasbourg site.

For new systems, such as the latest systems at 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.

Renewable energy production at the Martinique refinery

SARA has chosen to capitalize on the advantages of its geography and industrial process to produce renewable energy sources that will ultimately enable it to reduce its emissions linked to the consumption of conventional energy needed for its activities.

In particular, it has decided to recycle the hydrogen generated by its activities. Thanks to a **high-power (1 MW) fuel cell designed for a 15-year operating life, the European ClearGen project enables SARA to inject electricity into the Martinique power grid from the hydrogen co-produced at its refinery.** The industrial operation of this cell in a refinery is a world first and meets strong

economic and industrial challenges. With its inauguration in December 2019, SARA and Hydrogène de France became the first industrial operators of a certified high-power fuel cell. The expected gains are 3,837 tCO₂ eq. of emissions avoided per year.

In addition, SARA contributed to the photovoltaic power plant project by providing the operator with one of its own pieces of land. This **photovoltaic power plant supplies green electricity to around 3,000 residents of Martinique.**

These 2 projects enable SARA to help reduce the emission factor (quantity of carbon emitted) of the electric kWh produced on the island of Martinique.

ISO 50001 certification process initiated by the Group’s refinery

Every 4 years, SARA conducts a regulatory energy audit. To go even further, SARA initiated an ISO 50001 “Energy Management” certification process in 2019. This standard offers companies a comprehensive approach to continuously improve their energy performance, ensure their sustainability and take action based on the results. SARA’s commitment to this certification process, for which human and financial resources have been granted, demonstrates its willingness to take a proactive approach to the fight against climate change. SARA’s goal is to be certified by the end of 2020.

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 life of the equipment being estimated at over 100,000 hours (20 years).

Reduction in the mileage of distribution rounds with on-board computers

To optimize delivery routes, thereby reducing 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 communication system that automatically transmits daily delivery rounds to each truck, along with a proposed itinerary optimizing mileage as much as possible.

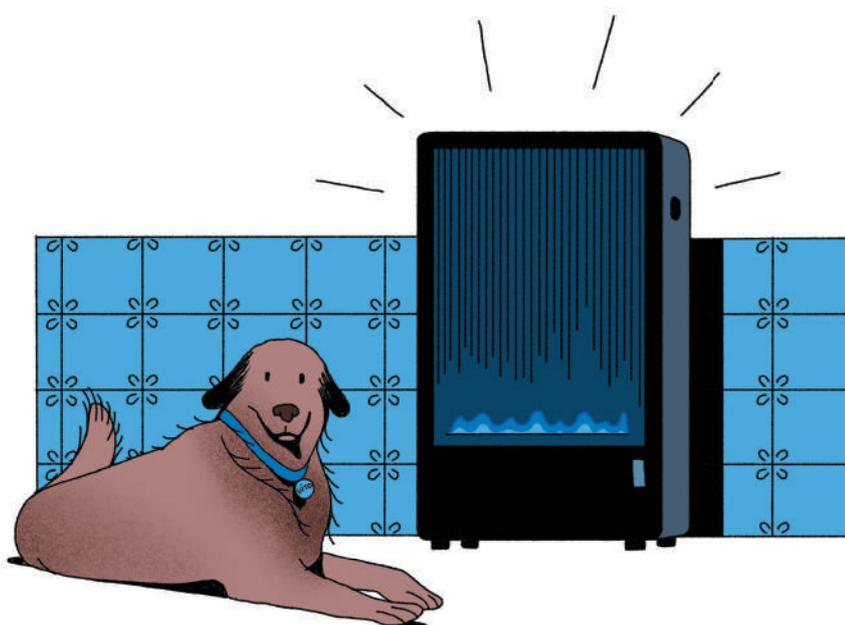
GROUP’S STRATEGIC DIRECTION

Over and above the measures already taken locally by Group entities to reduce their environmental footprint, Rubis has an emissions reduction target, with a trajectory spanning several years.

To this end and in order to determine practical actions to reduce the strongest impacts identified during the Bilan Carbone® assessment, a steering committee has been established to initiate and monitor the carbon footprint. Its task is keeping watch over regulatory and technical developments that will support the Group’s strategic deliberations on how to strengthen climate resilience and monitor improvements over the long term. In line with its DNA, the Group favors a decentralized approach to identify solutions adapted to the specific characteristics of each local environment (climatology, vehicle fleet, etc.).

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

- **Rubis Terminal is gradually diversifying its activities by developing the mix of products stored in its terminals.** Today, petroleum products account for 77% of the products stored. Other liquid products, such as chemicals, fertilizers, edible oils and molasses, are also stored and represent 45% of Rubis Terminal’s sales revenue.





RUBIS ÉNERGIE DJIBOUTI: INAUGURATION OF A NEW GAS STATION



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On September 15, 2019, the new RUBIS gas station at PK12 (kilometer mark 12) was inaugurated in the presence of His Excellency Mr. Yonis Ali Guedi, Minister of Energy in charge of natural resources, and Mr. Christian Cochet, Chief Executive Officer of Rubis Énergie.

Ideally located just outside Djibouti, at the start of National Road 1, which is the compulsory passage for all heavy goods vehicles in transit to Ethiopia, this new site almost instantly became the spearhead of the Rubis network in Djibouti.

Open 24 hours a day, 7 days a week, the PK12 gas station offers a full range of services to automotive customers, with a special focus on HGV drivers.

As far as automotive fuel supplies are concerned, holders of our Dromadaire card, unique in Djibouti, can easily pay for their fuel.

But PK12 offers much more than fuel: wide access, parking, high-pressure truck wash, lubricants, a cafeteria offering local products, all with a smile! A vast store, developed in partnership with the Casino Group's Proxy brand, also offers motorists a wide selection of food products, accessories and basic necessities.

At its inauguration, the Minister of Energy underlined the social impact of such a gas station, located on the outskirts of the densely populated district of Balbala, in particular with the creation of 15 local jobs.

Rubis' Djibouti subsidiary is now focusing on rural areas to provide easy access to automotive fuel for all inhabitants of the Republic of Djibouti.

Olivier Gasbarian
Chief Executive Officer
Rubis Énergie Djibouti

Rubis Terminal's LNG storage project: Elengy and Rubis Terminal signed a cooperation agreement to launch preliminary studies for the implementation of an LNG storage facility at the Reichstett terminal (Bas-Rhin). The objective is to meet the retail LNG needs of central-western Europe for road and river transport, and for industry. Chemically similar to LPG, its combustion properties are fairly close to those of diesel. LNG can reduce CO₂ emissions by up to 30% and, above all, virtually eliminate pollutant emissions: -99% sulfur dioxide (SO₂), -95% carbon monoxide, and between -50 and -90% of nitrogen oxides (NO_x);

- **Rubis Énergie:** The Rubis Énergie distribution subsidiary operating in the Channel Islands (FSCI) launched an **HVO biofuel marketing campaign in 2019**. HVO (Hydrotreated Vegetable Oil) is a synthetic diesel fuel that complies with the European renewable energy directive. This biofuel is made from raw materials: vegetables, residues and waste. It has the same chemical structure as standard automotive fuel, but is not derived from fossil sources. It can be used in most diesel engines without any prior modification, which taps into the full potential of its environmental qualities. It has a high

cetane number and reduces carbon emissions by 75%, in life cycle analysis, compared to conventional diesel. In Jersey, our subsidiary received an initial delivery of HVO to perform tests on its own fleet of cars and trucks, and also on the heavy-duty vehicles of customers who will order volumes in early 2020.

Moreover, Rubis Énergie is developing additional services for its customers, besides the sale of conventional fuels in stations (see inset above).

RESULTS

Energy production and consumption of the industrial sites

(in GJ)	Energy production		Energy consumption	
	2019	2018	2019	2018
Storage activity (Rubis Terminal)	NA	NA	362,913	353,722
Refining activity (Rubis Énergie)	604,977	557,788	1,750,229	1,630,840

In 2019, the net energy consumption of Rubis Terminal sites was up 2.6% compared with 2018. This change is related to product diversification and the increased storage of heated products that require energy to keep their temperature stable (carbon black at 50°C and bitumen at 170°C).

The refinery is equipped with 2 cogeneration combustion turbines and a main boiler. However, one turbine had to be permanently shut down due to curative maintenance work. In 2019, the Rubis Énergie refinery activity produced 118% of its electricity requirements (88,937 GJ of electricity produced compared

with 75,146 GJ used) and the total volume of energy produced (electricity and steam) accounted for 34.5% of the energy consumed over the period, stable compared to 2018.

Bilan Carbone®

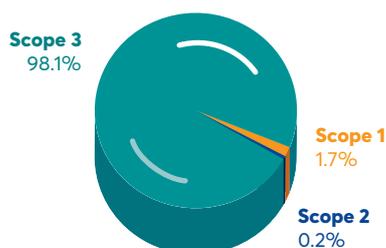
In 2019, the Group carried out a Bilan Carbone® assessment of its activities with the help of a specialized firm. This assessment was carried out in accordance with the methodology developed by Ademe and based on the recommendations of ISO 14064-1 and the GHG Protocol.

(in kt CO ₂ eq)	2019	2018
Scope 1⁽¹⁾ Direct greenhouse gas emissions	244	219
Storage	17	16 ⁽²⁾
Distribution	23	32
Support and services (refining/shipping)	204	171
Scope 2⁽¹⁾ Indirect emissions related to the sites' energy consumption	22	23
Storage	7	7 ⁽²⁾
Distribution	4	5
Support and services	11	11
TOTAL FOR SCOPES 1 AND 2	266	242
Scope 3⁽¹⁾ Other indirect emissions	13,719	10,628
of which customers' end use of products sold	13,537	10,484

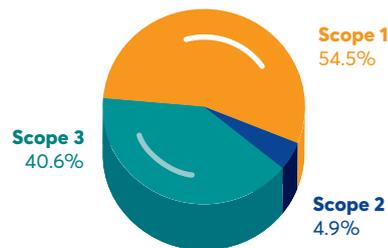
(1) See breakdown of items calculated for each of scopes 1, 2 and 3 in the methodology note, section 5.

(2) For Rubis Terminal in 2018, since only a total figure was available, scope 1 and 2 emissions have been broken down pro rata to the figures published in 2019. The total is 23,114 tCO₂ eq. in 2018 and 24,420 tCO₂ eq. in 2019.

GLOBAL BREAKDOWN OF SCOPES 1, 2 AND 3



BREAKDOWN OF SCOPES 1, 2 AND 3 EXCLUDING EMISSIONS RELATED TO THE USE OF PRODUCTS SOLD



Due to the Group's growth, emissions increased in absolute terms between 2018 and 2019. However, in order to monitor its emissions more closely, Rubis has set up indicators to measure changes in the carbon intensity of its activities (scopes 1 and 2):

RUBIS ÉNERGIE

Indicator	2019	2018
tCO ₂ /MWh sold	0.00532	0.00616

The activity's carbon intensity indicator (Rubis Énergie's scopes 1 and 2 CO₂ emissions in relation to the volumes of products sold in MWh) decreased slightly between 2018 and 2019, despite the increase in activity.

RUBIS TERMINAL

Indicator	2019	2018
kgCO ₂ /tonne moved	4.53	4.13

Rubis Terminal's CO₂ emissions in relation to throughput increased slightly in 2019 compared with 2018. This increase is mainly due to the increased share of chemicals (carbon black) and bitumen in the stored

products, which need to be heated. Paradoxically, the diversification of Rubis Terminal's activities in order to store a smaller share of petroleum products generates an increase in carbon intensity. Nevertheless,

since 2013 and thanks to major work to improve the energy efficiency of the facilities, Rubis Terminal has reduced its carbon intensity by 9%.

2.2.4 USE OF RESOURCES

In line with principles of good governance of its activities, the Group makes optimum use of the natural resources required by its value chain, a key component of its corporate responsibility (section 2.2.4.1). In addition, although Rubis produces little waste, it ensures that quantities are restricted, and waste is recycled (section 2.2.4.2).

2.2.4.1 CONSERVATION OF WATER RESOURCES NFIS

Risks

The Group’s activities, especially storage and refining, are not only dependent on water consumption, but may even have a negative impact on water resources.

The distribution of petroleum products does not require the recurrent and significant 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 are fire drills and the dosing of liquid fertilizers. This usual consumption is increased by occasional water requirements resulting from the filling of new bulk tanks with water (resistance tests).

The refining activity (support and services) consumes water mainly through its industrial transformation processes (boilers, etc.) and facilities’ fire-fighting systems.

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;
- **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 analyses make it possible to check that the water discharged after the various treatment stages complies with regulatory standards;

- **the investment project aimed at producing industrial water** at the Rubis Énergie refinery by way of sea water desalination (based on the principle of reverse osmosis) will significantly reduce the net consumption of fresh water. This project, called Green Water, is under way (civil works, piping) and should make it possible to cover all the refinery’s industrial water requirements (capacity of 30 m³/h for demineralization lines and 5 m³/h for service water requirements). Start-up of operations is scheduled for the fourth quarter of 2020 and should reduce the refinery’s municipal water consumption by 80%. Domestic water (sanitary, kitchens) will continue to be supplied via the drinking water system (see inset below).

RESULTS

(in m ³)	Water used*		Water treated*	
	2019	2018	2019	2018
Storage activity (Rubis Terminal)	259,185	182,205	453,512	428,910
Refining activity (Rubis Énergie)	227,894	232,304	92,208	101,027

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

Since 2018, water consumption by the storage activity (Rubis Terminal) has been optimized. Nevertheless, in 2019, the increase in water consumption corresponds to hydraulic tests performed on tanks, after

repair or construction. With respect to treated water, as this is essentially rainwater, the change corresponds to the change in rainfall at the sites.

Water consumption related to the refining activity (Rubis Énergie) is slightly down and remains below the regulatory threshold prescribed in the prefectural decree authorizing the operation of the refinery.



GREEN WATER PROJECT: REDUCING THE REFINERY'S DRINKING WATER FOOTPRINT

With the Green Water project, the Société Anonyme de la Raffinerie des Antilles (SARA) aims to replace water from the domestic system with raw industrial water treated on-site for use on-site. The refinery has opted for sea water abstraction that will undergo a series of treatments to turn it into “industrial raw water”. Thus, using the principle of reverse osmosis, the water will first be desalinated and then demineralized (other mineral salts removed) in order to fuel the plant’s boilers. After treatment, the amount of water abstracted from the sea will be sufficient to cover all the refinery’s requirements.

Following osmosis, the salt-concentrated water will be mixed with the water treated by the SARA treatment plant, producing water with salinity close to that of seawater, prior to discharge.

The local impact will be very favorable, as SARA will use almost no mains water, whereas until now it was the largest consumer in Martinique. Moreover, its discharges will be very similar to sea water in quality, which will prevent it from altering the balance of the marine environment.



2.2.4.2 WASTE MANAGEMENT

The activities of Rubis’ subsidiaries generate little hazardous waste, given their respective business lines, and therefore do not constitute a significant risk. The main sources of waste generation are storage and refining activities. In order to minimize its impact, the Group does its utmost to limit the quantity of waste generated and to recycle wherever possible. Subsidiaries ensure that residual waste that cannot be recycled is treated as required by applicable standards.

Analysis by business line

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 locally applicable standards, as outlined below in respect of the storage activity.

The storage activity generates 3 categories of hazardous waste:

- **waste generated by the subsidiaries’ regular activity**, particularly following maintenance and inspection, which are mainly comprised of residues and sludge removed when tanks (and/or separators) are cleaned during maintenance operations or when switching between products. Like all other waste, residue and sludge removal is systematically registered, declared and sent to 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.

The refining activity produces hazardous waste, mainly hydrocarbon residues and sludge (recovered when wastewater from tanks and/or separators is treated during maintenance work) and chemical products.

Measures to limit and recycle 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, when such treatment is available nearby.

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 containers, apart from the Dörtyol terminal in Turkey (currently being studied, as no local recycling networks are yet set up for this type of waste).

RESULTS

(in tonnes)	Volumes of hazardous waste		Waste recovery rate	
	2019	2018	2019	2018
Storage activity (Rubis Terminal)	4,056	5,391	38%	52%
Refining activity (Rubis Énergie)	98	72	78%	99%

Generation of hazardous waste as reported at Rubis Terminal sites rose by 25% between 2018 and 2019. The clean-up operation and dismantling of part of the facilities at the Reichstett site continued to generate a high volume of waste that could not be recycled.

The volumes of hazardous waste related to the refining activity and reported in 2019 were up compared to 2018. This significant change is mainly due to the fact that in 2019, 19 tonnes of soiled soil and pebbles were not recovered, leading to a decrease in the

recovery rate. Waste recycling consists in reusing petroleum sludge and other waste soiled by petroleum products as fuel or another energy source. Oils are regenerated for reuse. Metals and metallic compounds are recycled or recovered.



2.3 OPERATING IN A SAFE ENVIRONMENT **NFIS**

Due to the nature of the Group's activities, operational safety is an ongoing concern for Rubis HSE teams. The Group operates 41 industrial sites classified as Seveso sites (high and low threshold, including a refinery) in the European Union, together with 37 related sites elsewhere (petroleum or chemical products storage sites and LPG cylinder filling plants). The Group's HSE teams are committed to a continuous process of improving measures and procedures for the security of property and the safety of people, particularly employees, as well as

external service providers, customers and local residents. Strict industrial health and safety benchmarks are used by all Group subsidiaries. Efforts are focused on the safety of the facilities, so as to prevent major accidents, as well as on personal safety, to prevent workstation accidents and to prevent the safety of customers and local residents from being compromised.

Rubis 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). This investment guarantees the reliability of its operations and, as a result, the Group's competitiveness. The amount of investments on safety and environmental maintenance work increased sharply. In 2019, Rubis Terminal and Rubis Énergie invested respectively €9.9 million and €86 million (including €9 million for the new vessel, Bahama Blue), bringing the total to €95.9 million, compared with €82.3 million in 2018.



WHAT IS A SEVESO SITE?

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

Following an industrial accident that occurred in 1976 at a chemical plant in Italy, the European public authorities adopted a directive known as the Seveso directive, named after the town near the plant where the accident occurred, to prevent major industrial accidents. The European Seveso Directive, which has been amended 3 times since its adoption in 1982, classifies industrial facilities according to the level of danger they would represent in the event of an accident. The classification is based on the quantity of hazardous products stored at a Seveso site, with a "high threshold" or a "low threshold". The prevention measures to be implemented by operators are adapted to the type of site. They are based on a regularly updated hazard study.

2.3.1 OPERATIONAL SAFETY **NFIS**

Most of the Group's facilities in France and the rest of Europe (storage sites and LPG cylinder filling plants) are classified as Seveso sites, and are consequently subject to very strict regulations in respect to environmental protection and industrial safety (regular risk assessments, implementation of measures to prevent and, where necessary, manage the consequences of potential accidents). These standards are being phased in gradually by non-European subsidiaries, taking into account the constraints of the local environment.

RISKS

Risk mapping is drawn up by subsidiary Managers, assisted by the Managers of the distribution activity, the industrial facilities

and the shipping business (see chapter 4, section 1.1).

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

MEASURES TO LIMIT INDUSTRIAL RISKS AND TO GUARANTEE OPERATIONAL SAFETY

In order to reduce the industrial risks inherent in the Group's activities, whether or not they are subject to European regulations, and in accordance with the "zero major accidents" target the Group has set for itself, QHSE teams are required to work on the following factors.

Improve preventive maintenance of facilities and the perception of risks by employees

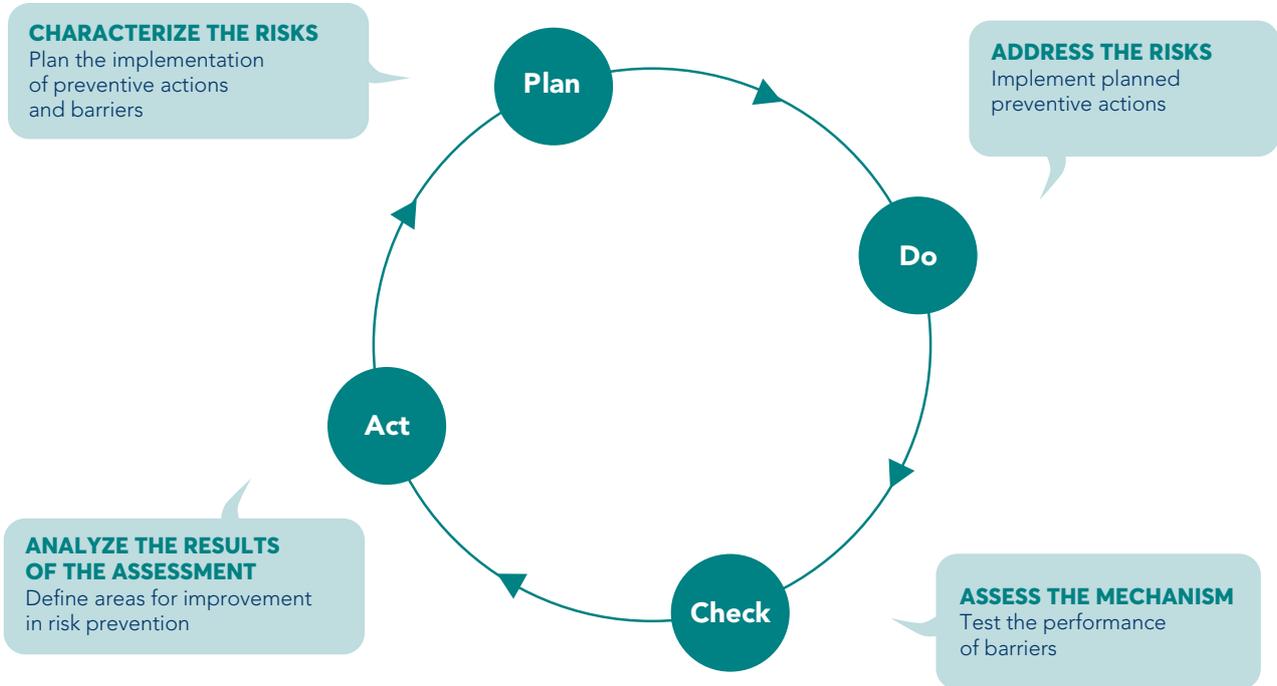
Rubis Énergie and Rubis Terminal continued to deploy their collaborative software for the preventive maintenance of facilities (computerized maintenance management system). Once the relevant information has been loaded into the database, these systems allow the planning of monitoring and preventive maintenance 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 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 the safety of facilities, respecting the rule **Plan – Do – Check – Act** (see diagram below).



Use of lesson learned 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 collates incident reports produced by each terminal. It comes with a lesson learned 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 its extranet to circulate a documentary base with, in particular, lesson learned, 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 incidents, near misses and accidents by subsidiaries, which gives rise to lesson learned, is an excellent indicator of the safety culture prevailing in the various entities. It is also an important feature of the continuous improvement process. For example, in 2019 Rubis Énergie was able to circulate to all subsidiaries a dozen lesson learned reports detailing the description, consequences and main causes of each incident, as well as the main recommendations to be implemented to prevent such incidents from recurring. These reports covered a wide variety of areas, including the inspection of LPG cylinders before filling, securing containers on trailers, works at gas stations, loading tank trucks at depots, automotive fuel deliveries to customers, etc. (see inset on following page).

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

Prevention of technological risks is ensured through regular inspections of the Group's sites and subsidiaries by the Industrial and Technical Departments of Rubis Terminal and Rubis Énergie. They are detailed in reports prepared in consultation with the Managers 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 lesson learned, each entity implements preventive measures appropriate for its own business, including:

- **internal inspections** of all LPG and automotive fuel bulk storage tanks, generally scheduled every 10 years;



RUBIS TERMINAL: TO PREVENT ACCIDENTS, LET'S IDENTIFY HAZARDOUS SITUATIONS AND NEAR MISSES

The challenge is key: preventing accidents!

Among other methods, accident prevention involves the detection and analysis of near misses and hazardous situations to further reduce the risk of accidents.

Because there is no such thing as zero risk. Just as we know there is a risk of slipping when we climb out of the bath, employees must be aware of their work environment and any possible risks. This involves, for example, identifying poorly lit areas, slippery floors, tools not securely stowed, etc.

Let's take the example of a hammer placed on top of a cupboard. Should the hammer fall on an operator passing by, the operator would be injured and this would constitute an accident. These incidents are automatically reported and recorded in the statistics. A near miss occurs when the hammer falls without causing any injuries. There may be no consequences this time, but it is still a hazardous situation that could have resulted in an accident. In conclusion, it is better to place the hammer elsewhere, in a safer place.

At Rubis Terminal, near misses and hazardous situations are compiled in an international database. Each employee can enter factual information: date, location, description of the situation or details of the near misses, initial ideas to prevent the situation from happening again, etc. Because that is the whole point: these situations must be treated as "accidents" and the causes investigated. The analysis of near misses remains crucial to finding appropriate solutions. Some situations do not generate a material risk and corrective actions can be quickly implemented. Others require more time.

Poster campaigns and site visits in pairs have been carried out to encourage employees to report near misses and hazardous situations.

This involves all employees, because safety is everyone's business!



- **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. For example, these systems are tested every year at Rubis Terminal sites.

Should a major event occur despite the implementation of these rigorous preventive measures, the Group has made provision for:

- **establishment of a crisis management organization** that can be triggered rapidly if there is a major event. For example, the high-risk establishments 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 people and goods. These plans are combined with 24/7 on-call crisis management procedures that may be activated depending on the severity of the event. Lastly, some subsidiaries organize regular training sessions on crisis communications via accident simulation exercises, allowing them to test pre-established 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. Rubis Énergie also 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), expert bodies in the area of aviation refueling that provide general operational, training and safety support.

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



FIRE PROTECTION AT RUBIS TERMINAL

Over the last 10 years, the largest investments made in Rubis Terminal's flammable liquid depots have been dedicated to fire protection.

In France, the strategy of autonomy has been adopted and static firefighting facilities have been built to avoid the need for teams to deploy mobile resources. To enhance personal safety, we are currently supplementing these devices with remote controls and preset scenarios in semi-automatic mode.



In Turkey, a fire-fighting pump house has been built on the jetty to combat a possible outbreak of fire at the vessel loading berths. Connected to the depot's fire circuit, it allows an unlimited supply of water.

At the Antwerp and Rotterdam sites, the defense system integrated the principle of autonomy and the remote control of pre-programmed scenarios right from the construction phase. The recent deployment of the Computerized Maintenance Management System (or CMMS) now makes it possible to schedule tests in order to periodically and reliably check our entire fire protection system.

Our fire risk has been greatly reduced as a result of all these improvements.

Jean-Philippe Laillé
Operations Manager
Rubis Terminal

RESULTS

In 2019, in line with the target set by the Group, no major accidents occurred as a result of Rubis Énergie and Rubis Terminal activities.

Over and above the constant concern to prevent major industrial accidents, the Group also continues to make efforts to minimize the occurrence of more minor industrial accidents as far as possible.

2.3.2 PERSONAL SAFETY NFIS

Personal safety is a direct result of operational safety. Rubis is just as keen to ensure workplace safety (section 2.3.2.1) as it is to ensure the safety of customers and local residents (section 2.3.2.2). **The target is still to have no fatalities at Rubis facilities and to reduce the number of accidents likely to cause labour disruption as much as possible for both subsidiaries' staff and for external service providers.** With regard to road traffic accidents (particularly on the African continent, where the accident rate

is high), each subsidiary is responsible for implementing the instructions and training plans needed to reduce, as far as possible, the rate of accidents recorded in line with local constraints.

2.3.2.1 HEALTH AND SAFETY AT WORK NFIS

Rubis has implemented a proactive policy on health and safety at work. It also focuses on the prevention of accidents at work, the frequency of which is declining, and on the prevention of occupational and non-occupational illnesses.

Risks

Beyond the generic risks inherent to any industrial activity, Rubis business lines entail more specific risks in terms of health and safety at work, linked particularly to:

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

The Group endeavors to offer the safest working conditions to its employees and to service providers working on its sites.

Measures taken

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

Since 2015, variable compensation for Group Management includes a criterion relating to the accident rate (frequency rate of accidents at work per million hours worked), underscoring its commitment and involvement in safety issues.

Accidents at work and operator safety

To guarantee the maximum level of safety for operators at Group facilities, each entity is responsible for holding training sessions for external operators on the risks generated by the facilities and the products handled within said facilities. Rubis Énergie has, for example, set itself **the additional target of keeping training levels high enough to ensure that employees' HSE-related performance does not drop**. Rubis Terminal, where operational teams already receive training on the subject, aims to additionally **train all company headquarters employees in HSE risk awareness over the next 3 years**.

Moreover, prior to operating in a facility, external service providers must also approve a safety plan (sometimes called a prevention plan) describing the risks associated with the work, safety instructions and emergency procedures.

The target is to have no fatalities and to reduce the number of accidents likely to cause labour disruption as much as possible for both subsidiaries' staff and for external service providers.

Occupational illnesses and health

The Group continues to pay close attention to risks relating to occupational illnesses and, for several years now, has offered ergonomic training to employees in at-risk positions.

Regarding other health risk factors, exposure measurement campaigns are conducted, notably by the SARA refinery, 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 chikungunya (the Caribbean).

Lastly, private health cover is taken out for employees to enable them to access healthcare (see section 3.3.2).

Road safety

In the area of road safety, the Group is constantly seeking to improve outcomes in terms of road accidents associated with its activities. In addition to the application of the regulations applicable to the transportation of hazardous materials, additional measures are taken concerning road haulage. To avoid traffic accidents, some Rubis Énergie subsidiaries have decided to step up defensive driving training programs and to give specific instructions regarding local constraints such as no night driving in certain countries and/or random alcohol or drug testing.

Courses in **defensive driving** have been introduced in countries where this risk is heightened due to driving habits, distances, the poor quality of road infrastructure or the specific nature of the product transported.

Furthermore, measures have been taken to modernize equipment (fleet of vehicles) and some subsidiaries have rolled out **on-board electronic** support (France, Switzerland, Portugal) and tracking systems (Nigeria, Bermuda, Jamaica, South Africa, Madagascar).



A NEW FLEET OF TANK TRUCKS TO IMPROVE SECURITY IN HAITI

In 2017, the Rubis Group acquired Dinasa, the leading oil company in Haiti. With a 45% market share, Dinasa markets 550,000 m³ of automotive fuel annually for industrial customers, airlines and via a network of 130 gas stations.

Noting the age of the fleet of tank trucks used to transport petroleum products (petrol and diesel) to gas stations, an initial selection was made in 2017 to remove trucks in poor condition from this fleet.

In 2018, a 5-year action plan worth approximately \$17 million was implemented to replace 70 trucks owned by carriers working for Dinasa.

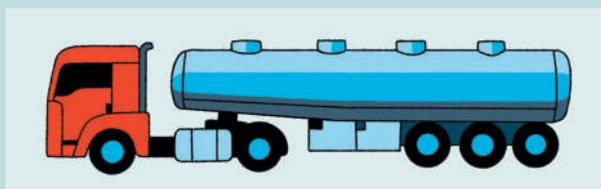
The action plan consists of:

- developing specifications that meet DOT 406 (USA) standards;
- selecting the carriers that will benefit from the action plan;
- establishing a loan contract for our carriers to participate in the financing of their investments;
- establishing an exclusive transport contract with carriers enabling them to obtain from banks the additional financing necessary for the acquisition of their trucks;
- negotiating with truck dealers to explain our needs and standards to them. The carriers will seek competitive offers in order to obtain the best prices.

In 2019, 13 new trucks were put into service. During the first quarter of 2020, 16 new trucks were put into service and financing for 15 new vehicles is planned for the second quarter, bringing the number of new tank trucks incorporated into the carriers' fleet to 44.

It is noteworthy that carriers have continued to invest in the acquisition of new trucks despite the very difficult political and economic situation in Haiti in 2019. This commitment alongside Dinasa reflects the trust placed in it by its partners.

By investing in the modernization of the fleet of tank trucks it uses, Dinasa reaffirms its determination to further invest in the country and to remain a leading player. This project also contributes to the Group's CSR approach by improving transport safety for both drivers and local residents, and by helping to reduce vehicle CO₂ emissions.



Luc Maiche
Chief Executive Officer
Dinasa

Training as a means of preventing risks

Given the risks associated with its activities, the Group is investing in training its employees in health, safety and the environment. Detailed data are provided in section 3.2.

Results

Accidents at work

Although the number of accidents at work recorded by the subsidiaries' Human

Resources Departments was up on the previous year (42 in 2019 compared with 34 in 2018), the health and safety efforts made in recent years by operational subsidiaries through raising employee awareness of the risks related to activities (see section 3.2.2) and improving QHSE procedures (see section 2), have gradually and significantly reduced the frequency of accidents at work, which have dropped over 40% over the last 5 years (9.7 in 2015 compared with 5.8 in 2019, per million hours worked).

While the change in this frequency rate is a key monitoring indicator for the Group, the teams are working hard to ensure all accidents are reported, whatever their area of occurrence. The Group thus strives to ensure its reporting is as complete as required by European regulations. In addition to the analysis of the change in frequency rate, quality of reporting, which can lead to a rise, is thus also a key indicator of safety culture.

	Number of accidents at work with sick leave > 1 day		Including number of fatalities		Frequency rate of accidents at work with sick leave (per million hours worked)		Number of occupational illnesses		Number of accidents at work that caused total and irreversible disability	
	2019	2018	2019	2018	2019	2018	2019	2018	2019	2018
Rubis Terminal (storage)	12	12	0	0	15.5	16	0	0	0	0
Rubis Énergie (distribution/ support and services)	30	22	1	1	4.7	3.7	3	3	0	1
Rubis	0	0	0	0	0	0	0	0	0	0
TOTAL	42	34	1	1	5.8	5	3	3	0	1

In 2019, the Group unfortunately experienced a fatal accident involving one of its drivers, in Nigeria.

The rate of absenteeism for accidents at work and occupational illnesses is still very low across the Group as a whole, standing at 0.15% in 2019. Annual fluctuations were

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

ABSENCE DUE TO ACCIDENTS AT WORK AND OCCUPATIONAL ILLNESSES*

	2019	2018
Rubis Terminal (storage)	0.53%	0.39%
Rubis Énergie (distribution/support and services)	0.11%	0.11%
Rubis	0%	0%
TOTAL	0.15%	0.14%

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

Occupational illnesses and health

No new occupational illnesses were reported in 2019.



2.3.2.2 PROTECTION OF THE HEALTH AND SAFETY OF LOCAL RESIDENTS AND CUSTOMERS NFIS

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

Risks

Where local residents live or exercise an activity close to sites, they can be exposed to any industrial risks that may occur. While most Seveso industrial sites are not located in urban areas and are only accessible to authorized persons, gas stations, which are accessible to the public, are often located in urban or suburban areas. However, the risk regarding gas stations is lower because the quantities of products stored there are limited.

Measures taken

All the measures described in the section on operational safety also protect the health and safety of local residents and customers. Depending on the sector in which 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 throughout section 2.3, section 4.2 and in chapter 3, section 3.1;
- **the Seveso regulations**, extremely stringent regarding health and safety obligations, are complied with by relevant European sites;
- **several subsidiaries have obtained ISO 9001 and 14001 certifications**, others are in the process of obtaining certification (see section 2.1.2). Recognition of this nature attests to commitments for the health and safety of individuals and respect for the environment;
- **a preventive maintenance and compliance program implemented** in gas stations.

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.

Results

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



RUBIS TERMINAL ROTTERDAM: SHELL SUPPLIER OF THE YEAR!

In 2019, for the fourth time in 6 years, Rubis Terminal Rotterdam received the Shell Award for the best chemical storage supplier in the ARA zone (Amsterdam, Rotterdam, Antwerp). Shell is one of the largest petrochemical companies and one of the most significant storage customers in the ARA region, an area where competition is intense. This result is thus a great success and recognizes our expertise vis-à-vis our competitors in the region.

Although the Rubis Terminal Rotterdam site started with a fuel oil storage activity in 2008, it has since developed into a highly specialized chemical terminal. This transformation has been accompanied by numerous investments and continuous improvements. Today, the terminal boasts state-of-the-art equipment and infrastructure, and is committed to 3 key objectives: zero emissions, safety, and customer satisfaction.

Our customers appreciate our logistics infrastructure for the management of trucks, railtanks, barges and vessels. This multimodal infrastructure also offers extensive opening hours, sophisticated automation and planning systems and, last but not least, relies on a highly committed and flexible team of employees.

Shell's assessment is based on a comprehensive list of **9 key performance indicators (KPIs) covering Health, Safety, Environment (HSE) and logistics performance**. HSE performance includes, in particular, the number of incidents, reporting, responsiveness and audits. Logistics performance is measured based on truck, barge and vessel turnaround times.

Rubis achieved a record score of 94% in 2019.

This award recognizes the quality of our teams' work and motivates all our employees. It is an excellent guarantee of quality for our current and future customers.

The terminal is currently in a new phase of expansion with the construction of 15 new tanks, 2 loading stations for trucks and a new barge jetty. Our commitment to continuously improve and provide a smooth and flawless service to our customers is a never-ending story.



Luc Jorissen
Chief Executive Officer,
Rubis Terminal B.V.



3

Attracting, developing and retaining talents

Mindful that employee commitment is key to the Group's success, Rubis ensures that individuals have the opportunity for professional development with the aim of attracting, developing and retaining its talents. To do this, Rubis focuses its efforts on promoting diversity and equal opportunities (section 3.1), employee skills development (section 3.2), health, safety and well-being at work (section 3.3) and involving employees in the Group's value creation (section 3.4).

Group risk mapping has identified the main social risks related to activities. These risks mainly concern the health and safety of employees and external service providers working on Group sites. Apart from these risks, a key challenge relating to human resource management was identified by the relevant departments in each division:

attracting, developing and retaining talent while the Group grows and where human resources must be adapted to Rubis' development strategy. This challenge is dealt with in this chapter.

To make the most of its human capital and better handle the specializations involved in

the Group's different activities, and in line with its corporate culture, its social policy roll-out has been decentralized. Operating subsidiaries manage human resources independently, in accordance with the Group's values, and implement local actions tailored to their needs and issues.



GUIDING THE WEALTH THAT IS PEOPLE, OUR DAILY MISSION

"Work is the main human activity and is essential to social integration; it is a source of mental stimulation for individuals and helps everyone achieve their potential and express their talents, which is clearly important in life."

Edmund Phelps, 2006 Nobel Prize for Economics

This quotation highlights the fact that we all find personal satisfaction in carrying out our professional activities. This stimulation is an important issue and makes our employees key to our Group's success.

Our history, the culture of our employees and the vision of our Managers are the foundations of our human resources management.

Revealing talent means taking diversity into account, integrating new employees, managing their employability, recognizing and motivating employees in organizations where the values should be close to their own.

These challenges are constantly changing, in terms of both work organization (work-life balance, health and well-being in the workplace, etc.) and career progression (mobility, training, fair compensation, etc.).

Talent management is the responsibility of senior Managers and human resources and is essential to the life of the Company and a key factor behind our competitiveness.

The quality of our teams is a real factor behind the success of our organizations.

Nathalie Brunswick
Human Resources Manager
Vitogaz France



Employee status and fluctuations in numbers

As of December 31, 2019, the Group had 3,965 employees, a sharp increase compared with 2018 (+11.9%). This growth, although

observed across all regions where the Group operates, is mainly due to the consolidation

of Gulf Energy and the KenolKobil Group, which operate in 6 East African countries.

CHANGE IN NUMBER OF EMPLOYEES BY DIVISION AND BY REGION

Number of employees	12/31/2019	12/31/2018	Change
Rubis Terminal (storage)	433	410	+5.6%
France	273	260	+5%
Outside France	160	150	+6.7%
Rubis Énergie (distribution/support and services)	3,510	3,116	+12.6%
Europe	641	587	+9.2%
Caribbean	1,311	1,232	+6.4%
Africa	1,558	1,297	+20.1%
Rubis	22	18	+22.2%
TOTAL	3,965	3,544	+11.9%

3.1 PROMOTING DIVERSITY AND EQUAL OPPORTUNITIES NFIS

Diversity and inclusion are part of the Group’s DNA. They represent an asset to the Company and a key to the effectiveness of its teams. Rubis has committed to outlaw any discrimination based on origin, religion, gender or sexual orientation, state of health and/or disability, political opinions, religious beliefs or family situation. These values are

clearly stated in its Code of Ethics. To ensure that everyone is protected against potential discrimination, a workplace whistleblowing system is being gradually rolled out in Group subsidiaries (Rubis Integrity Line), so that any situation undermining the Group’s values can be flagged. The Integrity Line enables all Group employees, as well as external and temporary workers, to report any such

situation in a secure way via a website (see section 4.1.1).

Since combating discrimination corresponds to a major social issue, the Group has set itself the target of zero discrimination in all cases reported, notably via its ethics hotline.

3.1.1 GENDER EQUALITY IN THE WORKPLACE

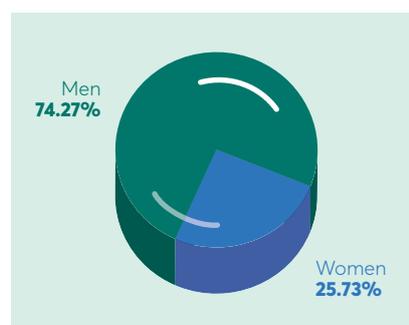
RISKS

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. In line with its principles of non-discrimination and convinced that lack of diversity is damaging to value creation, the

Group has set up initiatives to bring out talent without any gender distinction.

GENDER BREAKDOWN WITHIN THE GROUP AS OF 12/31/2019





MEASURES TAKEN TO IMPROVE GENDER EQUALITY IN THE WORKPLACE

To improve gender equality in the workplace, the Group has set a target to encourage the number of women promoted to increase by 2023. A number of initiatives have been set up within the Group. For example, Rubis Énergie’s Jamaican subsidiary (Rubis Energy Jamaica) is one of the largest English-speaking companies in the Caribbean to have committed, in March 2019, to the gender equality certification process devised by the United Nations Development Program (Gender Equality Seal for Public and Private Organizations). This certification includes the following objectives:

- eliminate gender-based pay gaps;
- elevate the role of women in decision-making;
- improve the work/life balance;
- improve women’s access to traditionally male jobs;
- eradicate sexual harassment in the workplace;
- communicate in a more inclusive, non-sexist, way.

Company agreements promoting the inclusion of women and gender equality in

the workplace have also been concluded in some of the Group’s subsidiaries, complementing existing measures in the fight against discrimination in hiring and in the promotion of equal pay, etc.

At 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 report is presented each year to the central Economic and Social Council. The ongoing situation is positive, particularly in terms of training.

At Rubis Énergie, Vitogaz France, for example, renewed a company agreement 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.

Communication campaigns were also launched to highlight women’s involvement in the Company and to help combat gender stereotyping in the workplace. For example, the Rubis subsidiary operating in the Eastern Caribbean (Rubis Caribbean) is actively involved in the international *Women’s History Month* campaign, which consists of putting

the spotlight on women’s contributions to historical events and contemporary society, and publicly recognizing the work done by its female employees.

Lastly, in order to continue improving the representation of women in positions of responsibility, the decision was made to include multi-year diversity targets within the Rubis SCA and Rubis Énergie management bodies as one of the criteria for variable compensation of the Management in 2020.

RESULTS

The number of women employed by the Group was up 18.5% year on year (1,020 female employees as of December 31, 2019, compared with 861 as of December 31, 2018). Women employees now account for 25.7% of the total headcount.

Management positions (senior Managers) in Rubis SCA (parent company) are mainly held by women.

Women hold 31.1% of positions of responsibility (senior Managers and executives), higher than their representation as a percentage of the total headcount. The percentage of women holding executive or senior managerial posts (21.2%) was markedly higher than the percentage of men with equivalent responsibilities (16.2%).

	2019			2018		
	Senior Managers	Executives	Non-executives	Senior Managers	Executives	Non-executives
Women	24.52%	33.91%	24.57%	26.4%	33.2%	21.4%
Men	75.48%	66.09%	75.43%	73.6%	66.8%	78.7%
HEADCOUNT	208	488	3,269	220	443	2,899

GENDER EQUALITY INDEX FOR FRENCH COMPANIES

This index is calculated on the basis of 4 criteria:

- pay gap between men and women (40 points);
- gap in individual rate of compensation increase between men and women (35 points);
- share of female workers receiving a pay raise following maternity leave (15 points);
- number of women represented in the top 10 compensation packages (10 points).



Rubis Terminal SA: 84/100, one grade higher than the national French average, which is 83 for large companies and 82 for medium-sized companies.

Rubis Énergie: the following French companies publish their gender equality index:

- SRPP (Réunion): 87/100;
- SARA (French Antilles): 79/100 (learn more at <http://www.sara-antilles-guyane.com/index-de-legalite-professionnelle-de-sara/>).



FIGHT AGAINST DISCRIMINATION: EASIGAS IS AWARDED THE HIGHEST LEVEL OF CERTIFICATION

The Broad-Based Black Economic Empowerment or BBBEE was first implemented in South Africa in 2003. Its primary purpose is to establish a legislative framework for the promotion of black economic empowerment geared to redress some of the inequality and injustices wrought by apartheid. It is essentially a strategy to stimulate further economic growth and create employment, targeting the South African economy's weakest point: inequality.

In 2019, Easigas achieved a **Level 1 BBBEE** rating which is the highest score obtainable and has clearly cemented our competitive advantage given that none of our competitors to date have attained this rating.

There are 5 key pillars to BBBEE, namely, ownership, management control, skills development, enterprise & supplier development and socio-economic development.

We take particular care to continually improve the working environment, ensuring appropriate management and control as well as working to ensure equality at work, objectives that are clearly supported by our targeted training and development actions. Over a period of 2 years, we took on 17 unemployed young people as apprentices. Three of them are now full-time employees of Easigas.

In terms of enterprise and supplier development, our procurement strategy focuses in qualifying and supporting a vendor pool which is supportive of our BBBEE objectives. Easigas' further long-term initiative is to support previously disadvantaged businesses through mutually beneficial partnerships.

The ongoing work undertaken by the Of Soul and Joy program (see section 4.4.2.3) supports the socio-economic pillar of the BBBEE scorecard. Not only is the contribution from Rubis Mécénat impacting the South African landscape, independent initiatives managed by Easigas further ensure that the essence of BBBEE is entrenched in the company's strategies and initiatives.

Easigas is proud of this Level 1 BBBEE rating achievement and this was celebrated across the organization. This demonstrates the company's ongoing commitment to transformation, employee upskilling and supporting various stakeholders in order to embody the spirit of the BBBEE legislation and growth within the South African economy. This Level 1 also provides opportunities as the BBBEE rating is becoming increasingly important in maintaining and winning new businesses in South Africa.

Erika Da Cruz

*Human Resources Manager
Easigas*



© Jabulani Dhlamini

Of Soul and Joy, social and artistic program launched in 2012 by Rubis Mécénat and Easigas.



3.1.2 REGIONAL DIVERSITY

Operating in over 40 countries around the world, Rubis is keen to capitalize on the rich cultural diversity of its employees and make an impact in the regions in which it operates. Employees are spread equally across Africa,

the Caribbean and Europe. In order for this cultural diversity to be reflected in corporate culture and management, when acquiring foreign subsidiaries, the Group tries to retain and/or hire local employees, for their

experience and knowledge of the country. Thus, only 2 posts are generally occupied by expatriates in subsidiaries, that of Chief Executive Officer and Chief Financial Officer.

REGIONAL BREAKDOWN OF THE GROUP'S EMPLOYEES

	2019	2018
Africa	39.3%	36.6%
Caribbean	33.1%	34.8%
Europe	27.6%	28.6%

3.1.3 INTER-GENERATIONAL DIVERSITY

The age structure shows that the Group maintains broad intergenerational diversity in its headcount, which greatly enhances the experience of its teams and the transfer of knowledge. Each age group is represented

in a relatively homogeneous way, without any significant variations between business lines and regions. To anticipate the retirement of senior employees, the Group has set up an active training policy. Furthermore,

the Group contributes to the integration of young people on the labor market through recruitment of interns, students in apprenticeship contracts and young graduates.

BREAKDOWN OF EMPLOYEES BY AGE GROUP

	12/31/2019				12/31/2018			
	<30 years	Between 30 and 40 years	Between 40 and 50 years	>50 years	<30 years	Between 30 and 40 years	Between 40 and 50 years	>50 years
Rubis Terminal (storage)	9.9%	32.5%	33.1%	24.5%	9.9%	33.7%	32.6%	23.6%
Rubis Énergie (distribution/support and services)	13.1%	33.7%	29.7%	23.4%	11.7%	32.1%	31.4%	24.2%
Rubis	9.1%	31.8%	31.8%	27.3%	11.1%	35.7%	21.4%	35.7%
TOTAL	12.8%	33.6%	30.1%	23.6%	11.5%	32.4%	31.5%	24.1%

To retain this intergenerational dynamic and maintain proximity between younger and older employees, Rubis Énergie and Rubis Terminal have introduced practices favoring seniors.

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

- 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;

- 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.

3.1.4 DISABILITY

The Group has adopted a policy of openness in favor of disability, which includes funding associations and institutions working in healthcare as part of its sponsorship activities (see section 4.3.2).

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 company headquarters has been sourcing office supplies and maintenance products from establishments employing workers with disabilities under the auspices of the Commission for rights and autonomy of disabled people (CDAPH).

3.2 SKILLS DEVELOPMENT NFIS

RISKS

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

MEASURES TAKEN

Developing employee skills contributes to the Group's performance and each division has set out training targets. Rubis Énergie has set itself the target of maintaining the rate of training over 50% of its total headcount over the year and, more generally speaking, providing sufficient training sessions to ensure that employee performance levels do not drop. Rubis Terminal's target is to train 100% of head office employees in each country in HSE risk awareness by 2021.

Training as a means of moving forward

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

Rubis 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, etc.

Training as a means of preventing risk

To protect the physical integrity of its employees in performing their duties, the Group is investing:

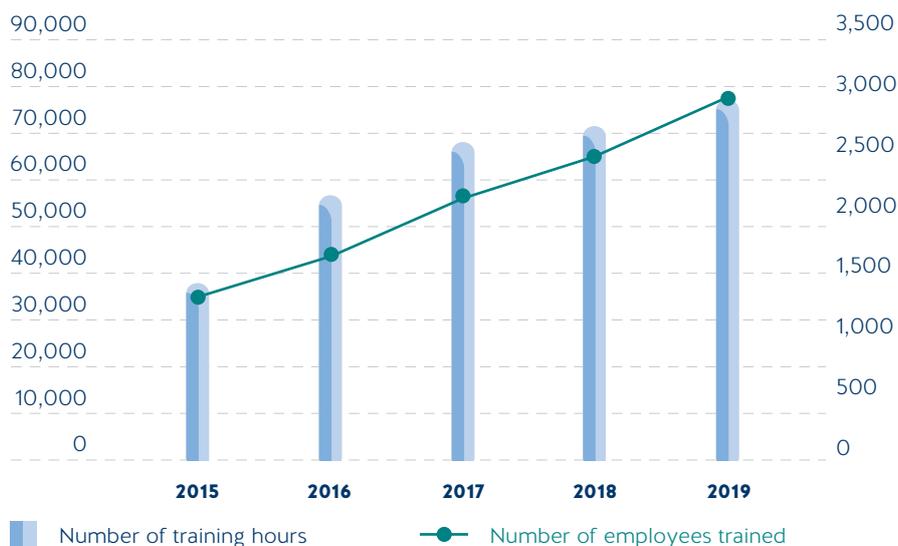
- **in terms of health,** through the provision of ergonomic training for workstations presenting a risk to the health of employees, as well as safety training for different "at risk" jobs for staff and external workers, product training (welding, handling of chemical products), workplace first aid and rescue, etc.;
- **in terms of industrial safety,** with the assistance of professional bodies such as the GESIP (Groupe d'Étude de Sécurité des Industries Pétrolières – Group for Safety Research in the Petroleum 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 reduce the risk of road accidents occurring in regions with poor quality road infrastructure and/or generally inadequate driver training, (defensive driving) (see section 2.3.2.1);
- **in terms of the environment** or quality (assimilation of ISO standards);
- **in control of systems designed to protect facilities** (tank maintenance, training in operating fire-fighting 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.

RESULTS

The total number of training hours delivered within the Group was up 7.4% (77,103 training hours delivered in 2019 compared with 71,804 hours in 2018). The number of employees receiving training was up 18.7% (2,986 in 2019 compared with 2,515 in 2018) thus reaching a new high with 82% of employees in the storage business receiving training and 75% of employees in the distribution and support and services businesses.

TRAINING INITIATIVES OVER THE LAST 5 YEARS





NUMBER OF TRAINING SESSIONS DELIVERED AND EMPLOYEES IN RECEIPT OF TRAINING

	2019			2018		
	Total training hours	Number of employee recipients	Percentage of employees trained	Total training hours	Number of employee recipients	Percentage of employees trained
Rubis Terminal (storage)	11,909	355	82.08%	11,867	342	86.83%
Rubis Énergie (distribution/support and services)	64,833	2,616	74.53%	59,727	1,783	69.01%
Rubis	361	15	68.18%	210	8	50%
TOTAL	77,103	2,986	75.32%	71,804	2,133	70.98%

In general, the Group kept up its risk prevention work with more than 23.2% of employees trained in health and safety. The

reason this rate is lower than the previous year (31.5% in 2018) is because the amount of training provided varies annually depending

on need, as well as due to the consolidation of the KenolKobil Group in Kenya, where training initiatives are now being rolled out.

NUMBER OF EMPLOYEES TRAINED IN HEALTH AND SAFETY

	2019	2018
Rubis Terminal (storage)	295	254
Rubis Énergie (distribution/support and services)	615	863
TOTAL	920	1,117

3.3 ENSURING HEALTH, SAFETY AND QUALITY OF LIFE AT WORK



3.3.1 HEALTH AND SAFETY

Personal health and safety are key to the Group's social policy. These risks affect both employees and staff from external companies as well as customers and local residents living near sites operated by the Group. This subject is dealt with in section 2.3.2.

Lastly, health insurance coverage for employees aims to protect them from the potentially significant financial impacts of illness or accidents.

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.

3.3.2 QUALITY OF LIFE AT WORK

RISKS

The Group is aware of the importance of offering its employees working conditions that allow them to reach their full potential. This is necessary to ensure motivation, cohesion and stability among teams. It is key to performance and builds employee commitment.

Moreover, employee commitment is very much dependent on senior Managers' capacity to help new employees settle in, to inform their teams of what the Company expects of them, how their work contributes to the Group's success, to be respectful and attentive to the needs of the individual, and to develop the collective intelligence and mutual listening skills required for any relationship built on trust.

MEASURES TAKEN

Labor relations

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 operating in France). Collective agreements pertain notably to wages, the company savings plan, incentives, profit-sharing, gender equality and training (see section 3.4).

Collective agreements are concluded with the aim of achieving positive impacts, in particular on employees' working conditions and the Company's economic performance. High-quality dialog has a direct effect on the success of developments within the Company to adapt to a changing environment.

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

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

- stabilize the headcount and jobs on a like-for-like basis;
- keep its rate of absenteeism for non-occupational illnesses under 2%.

Monitoring psychosocial risks

The Group specifically targets the prevention of psychosocial risks, knowing that this improves quality of life at work.

To increase prevention of these situations, a psychosocial risk assessment is conducted and updated on a regular basis in certain subsidiaries. To encourage the signaling of potential risks, Group employees, as well as external and temporary employees, can report any harassment in a secure manner via the professional whistleblowing line gradually being rolled out in the Group's subsidiaries (Rubis Integrity Line), in addition to traditional reporting channels (line Managers, HR, staff representatives) (see section 4.1.1).

Work commitment

The Group encourages the emergence of initiatives that promote dialog and team spirit. These are, in particular, reflected by:

- the organization of team-building events to foster employees' team spirit;
- the improvement of the ergonomics and design of workspaces. Rubis Mécénat (the Group's cultural fund), for example, initiates artistic projects on the Group's industrial sites or on subsidiaries' premises, thus helping to establish a culture of well-being and stimulate employees' creativity;
- involving employees in the implementation of sustainable socio-cultural projects. By way of example, Rubis Mécénat has involved employees in projects such as Of Soul and Joy in South Africa (photography program aimed at young people in townships), InPulse art project in Jamaica (creative visual arts platform), and Ndao

Hanavao in Madagascar (social design innovation lab) (see section 4.2.3);

- seeking employees for community projects. This type of initiative is conducted locally in most subsidiaries (sponsorship or fund-raising, support for charitable associations and the organization of local community events, etc.) (see section 4.2.3);
- valuing employees' work (celebrating successes at internal events, etc.).

Social security insurance for employees outside France

Mindful of the role that social security cover can play in combating inequality and the importance of protecting its employees' health, the Group is endeavoring to roll out cover for employees working in countries where cover is not mandatory.

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.

RESULTS

Indicators of employee turnover and absenteeism are used to assess changes in the social climate and motivation of employees in subsidiaries.

Monitoring of staff turnover shows that the Group continued its dynamic recruitment policy in 2019. At Rubis Énergie, the gaps are mainly due to a stabilization in headcount on a like-for-like basis in 2019, after a year in 2018 marked by restructuring in Madagascar and Haiti, and "mission" employment contracts in shipping (since this activity requires the use of short-term contracts).

EMPLOYEE TURNOVER IN 2019

	Hirings		Resignations		Dismissals		Departures by mutual agreement	
	2019	2018	2019	2018	2019	2018	2019	2018
Rubis Terminal (storage)	58	44	11	19	4	9	8	6
Rubis Énergie (distribution/support and services)	577	773	162	122	86	132	44	243
Rubis	4	3	0	0	0	0	0	0
TOTAL	639	820	173	141	90	141	52	249

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

ABSENTEEISM NOT DUE TO ACCIDENTS AT WORK OR OCCUPATIONAL ILLNESS*

	Absences due to accident or non-occupational illness		Unjustified absence	
	2019	2018	2019	2018
Rubis Terminal (storage)	0.53%	6.45%	0.32%	0.27%
Rubis Énergie (distribution/support and services)	0.11%	1.40%	0.20%	0.04%
Rubis	0%	0.49%	0%	0%
TOTAL	0.15%	1.93%	0.21%	0.06%

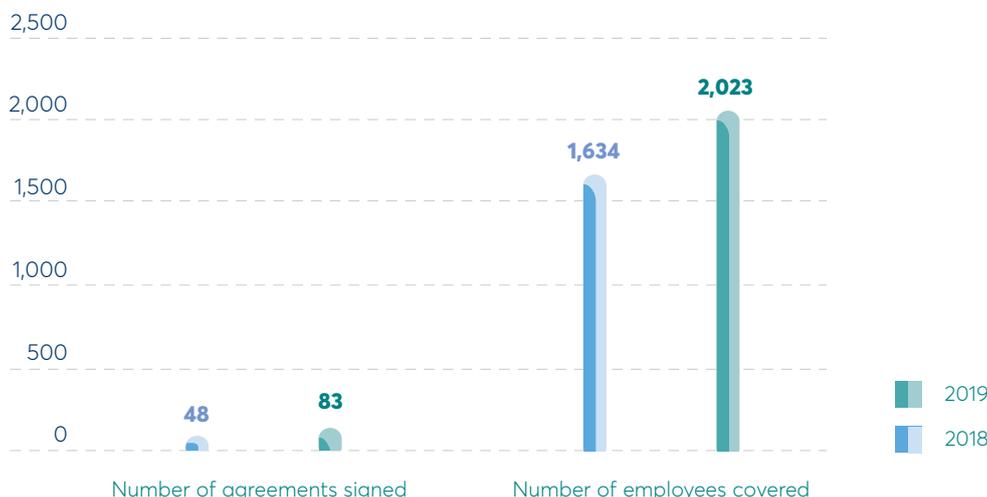
* Days lost as a percentage of total working days per annum.



NUMBERS OF EMPLOYEES COVERED BY COMPANY AGREEMENTS

At Rubis Terminal, 45 collective agreements, company agreements or unilateral employer decisions were signed in 2019, covering 325 employees. 34 agreements or unilateral decisions were in place at Rubis Énergie, covering 1,676 employees.

NUMBER OF GROUP EMPLOYEES COVERED BY COMPANY AGREEMENTS



3.4 INVOLVING EMPLOYEES IN THE GROUP'S VALUE CREATION NFIS

RISKS

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

MEASURES TAKEN AND RESULTS

Wage increases

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. Decisions on pay are, for the most part, decentralized in each operating subsidiary.

In 2019, around two-thirds of employees were given a wage increase, similar to the proportion in 2018. Non-executive and executive employees are those who benefited the most from these increases. Lastly, although the percentage of non-executive women receiving a pay raise was lower than that of non-executive men, it was higher for executives and senior Managers.

PERCENTAGE OF EMPLOYEES RECEIVING A PAY RAISE

	2019						2018					
	Non-executives		Executives		Senior Managers		Non-executives		Executives		Senior Managers	
	Men	Women	Men	Women	Men	Women	Men	Women	Men	Women	Men	Women
By gender	64.6%	58%	63.4%	75.2%	50%	66.7%	72.2%	58.9%	54.9%	51.4%	47.7%	50%
By category	62.9%		67.4%		54.1%		69.1%		53.7%		48.3%	
TOTAL HEADCOUNT	63%						66%					

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. In 2019, employees were able to benefit from this scheme.

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. As of December 31, 2019, Rubis Avenir held 1.27% of Rubis' share capital.

In 2019, the capital increase reserved for employees was widely subscribed, 67.16% of

eligible employees having taken part in this issue (68.67% in 2018).

Incentive plans

The purpose of long-term incentive plans (free shares, stock options) is to acknowledge the positive contribution made by certain high-potential executives and Senior Managers at Rubis' subsidiaries worldwide 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 plans 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' Managing General Partners.

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

3.5 CONSOLIDATED EMPLOYEE-RELATED DATA – GROUP SCOPE

	2019	2018	Change
Headcount			
Total headcount	3,965	3,544	+11.9%
Headcount by division			
• Rubis Terminal (storage activity)	433	410	+5.6%
• Rubis Énergie (distribution and support and services activities)	3,510	3,116	+12.6%
• Rubis	22	18	+22.2%
Headcount by geographic breakdown			
• Africa	1,558	1,297	+20.1%
• Caribbean	1,311	1,232	+6.4%
• Europe	1,096	1,015	+8%
Headcount by gender			
• Women	1,020	861	+18.5%
• Men	2,945	2,683	+9.8%
Headcount by age			
• <30 years	506	408	+24%
• 30 to 40 years	1,332	1,162	+14.6%
• 40 to 50 years	1,193	1,107	+7.8%
• >50 years	934	868	+7.6%
Headcount by category of position			
• Non-executives	3,269	2,896	+12.9%
• Executives	488	429	+13.8%
• Senior Managers	208	220	-5.5%
New hires			
• Number of hires	639	820	-22.1%
Departures			
• Resignations	173	141	+22.7%
• Dismissals	90	141	-36.2%
• Departures by mutual agreement	52	249	-79.1%
Absenteeism			
• Due to non-occupational illness	2.06%	1.88%	-
• Due to non-occupational accident	0.07%	0.05%	-
• Due to occupational illness	0%	0%	-
• Due to accident at work	0.15%	0.14%	-
• Unjustified	0.21%	0.06%	-



	2019	2018	Change
Health and safety at work			
• Accidents at work with sick leave >1 day, not fatal	41	33	+24.2%
• Fatal accidents at work	1	1	0%
• Occupational illness	3	0	
• Frequency of accidents at work per million hours worked	5.8	5.03	+15.3%
Working hours			
• Full time	3,926	3,496	+12.3%
• Part time	39	48	-18.8%
• Shift work	369	333	+10.8%
Training			
• Number of training hours	77,103	71,804	+7.4%
• Number of employees receiving training	2,986	2,515	+18.7%
Labor relations			
• Number of collective agreements, company agreements and unilateral employer decisions signed	83	116	-28.4%
• Number of employees covered	2,023	1,959	+3.3%
Pay rise			
Percentage of total headcount	63.03%	65.98%	-
Percentage of employees receiving a pay rise within a job category			
• Non-executives	62.9%	69.12%	-
• Executives	67.4%	53.73%	-
• Senior Managers	54.1%	48.29%	-
Percentage of employees receiving a pay rise within a gender category			
• Women	61.21%	57.03%	-



4

Working responsibly and with integrity

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

Due to the fact that it operates on an international level in 40 or so countries in Europe, the Caribbean and Africa, the prevention of corruption is a major issue for the Group (section 4.1.1). The Group is also endeavoring to extend its principles

of responsibility to its value chain and to gradually introduce a responsible purchasing policy with the aim of common standards of exemplary actions (section 4.1.2). Lastly, the Group's subsidiaries attach great importance to dialog with stakeholders and encouraging

momentum in the regions where they operate, both in terms of the economy and employment and in terms of culture and "living together" (section 4.2).

4.1 RUBIS' ETHICS POLICY

Ethics is seen as one of the Group's assets, key to its reputation and loyalty. Integrity is one of the central pillars of the Group's ethics approach (section 4.1.1), as is the Group's commitment to respecting its employees' fundamental rights (section 4.1.2).

4.1.1 FAIR PRACTICES

"Personal integrity is key to ensuring exemplary collective behavior. It is a 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."

Gilles Gobin and Jacques Riou,
Rubis Group Managing General Partners
Extract from the Code of Ethics

RUBIS' CODE OF ETHICS

Collective and individual commitment is key to adopting ethical behaviors in line with the Group's values. Rubis has formalized

an ethical framework for all the Group's subsidiaries so that its rules of conduct are shared and respected by all.

This Code of Ethics (accessible to the general public on the Group's website: www.rubis.fr) lays down the values that Rubis considers fundamental:

- compliance with all applicable laws and regulations wherever the Group operates;
- fight against corruption, fraud, misappropriation of funds and money laundering;
- prevention of conflicts of interest;
- compliance with competition, confidentiality and insider trading rules, as well as with specific laws relating to war and/or embargo zones;
- respect for people, including fundamental rights and human dignity, protection of privacy, as well as the fight against discrimination and harassment;

- compliance with rules regarding health and safety conditions at work, as well as those pertaining to environmental protection;
- 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.

In each of these fields, Rubis details the overall principles to be adhered to by employees in performing their duties. This Code of Ethics is given to new arrivals. Subsidiaries organize training sessions to explain its contents and to answer employee questions. 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.



FIGHTING CORRUPTION NFIS

System measures

In line with its values and current legislation, in particular the law on transparency, fighting corruption in all its forms and modernizing the economy, referred to as Sapin II, Rubis is putting into practice its commitment, as outlined in its Code of Ethics, to fight against corruption in all its forms, by gradually introducing a comprehensive anti-corruption system. To date, this comprises the following measures:

- **a guide to applying the anti-corruption policy** that supplements the Code of Ethics. This guide aims to help the senior Managers and employees who are most exposed to identify at-risk situations and to adopt practical preventive measures;
- **third-party assessment guidelines to help** operating staff to identify third parties liable to present a risk, to perform appropriate due diligence and to deal with third parties on a case-by-case basis;
- **corruption risk mapping:** this analysis was conducted at operating entity level by subsidiary senior Managers based on a methodological guide and meetings bringing together subsidiaries' core functions (purchasing, sales, operations, HR, finance, compliance, etc.). Hierarchization of risks resulted in an additional review in 2019. Additional risk reduction measures were identified as a result of this mapping and will be implemented;
- **regular awareness campaigns in respect of ethical and anti-corruption** rules in all Group subsidiaries for employees in the most sensitive positions and, in some subsidiaries, for all employees. More targeted training initiatives were held for Compliance Officers (Group compliance seminar) and for Group Managers and subsidiary Managers of Rubis Énergie. Lastly, a communication tool was rolled out across the Group on International Anti-Corruption Day, celebrated on the ninth of December each year to reiterate the Group's commitments to fighting corruption. These initiatives will continue in 2020;
- **a global whistleblowing system:** the Rubis Integrity Line, set up in 2018 and which is gradually being rolled out across all Group entities. It enables all Group

employees, as well as external and temporary workers to report observations in a secure way, via a website. These reports can relate to acts of corruption or other ethical issues (environment, security, fraud, personal data, human rights, etc.) and, more generally speaking, to any situation or conduct that may be contrary to the Code of Ethics. The overall system architecture was designed to provide a means of filing these reports and processing them internally, while ensuring complete confidentiality. Rules governing the use of the Integrity Line set out the whistleblowers' rights and responsibilities so that the system can operate smoothly in a climate of trust. The Group reminds users, in particular, that all whistleblowers will be protected against any reprisals. A training kit has been dispensed to Compliance Officers to support the roll out of the Integrity Line. In 2019, the Group received 4 alerts via the system;

- after informing/consulting staff representative bodies, where appropriate, entities are gradually amending their internal rules or employee handbook to include specific wording which states that failure to comply with the Code of Ethics and the anti-corruption policy may lead to **disciplinary sanctions**;
- **an internal accounting control framework** (see chapter 3, section 3.2);
- **assessment of the implementation of system measures:** the internal risk management system, details of which are given in chapter 3, section 3.2.3, incorporates checks on the application of the Group's ethics and anti-corruption rules. In addition, each subsidiary reports annually to the Group's Compliance and CSR Officer on progress as regards to program roll-out.

Governance

The Group and its management bodies have prioritized the prevention of corruption. Since 2016, variable compensation for the Management includes an ethics criterion relating to the implementation of the system across all entities.

A specific organization has been put in place to support the roll out and monitoring of the anti-corruption program:

- the role of the **Group's Compliance and CSR Manager**, reporting to Rubis' Corporate Secretary, is primarily to define Group policies and procedures in relation to ethics and compliance and to support, in conjunction with the entities, their deployment and implementation within the Group. It proposes enhancing the program by incorporating strategic issues, best practices and new regulations and regularly reports on its work to the Group's Management as well as to the Risk Monitoring Committee;
- **Divisional Compliance Managers** roll out the program within their divisions and manage operational issues in conjunction, if necessary, with the Group's Compliance and CSR Manager;
- the **37 Compliance Officers**, appointed in operating entities, ensure that the anti-corruption policy is properly understood and is being applied in the field.

Tools have been provided to coordinate this compliance network and to support Compliance Officers in their work, including practical information sheets on how to deal with gifts and invitations and on managing conflicts of interest or Integrity Line training materials for employees. The "Think Compliance" newsletter was created in late 2018 to support the dissemination of compliance culture within the Group. Two editions were distributed in 2019.

The Group is committed to a continuous improvement approach and supplements its anti-corruption system in line with changes in legislation 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.



FIGHTING TAX EVASION

In 2019, the Rubis Group paid taxes of €210 million.

Group companies ensure that tax returns and payments are submitted in accordance with local regulations. They complete the tax returns required under the jurisdictions where the Group operates its businesses. Rubis has opted for tax consolidation in France since January 1, 2001 (see note 4 to the separate financial statements). In accordance with its legal obligations, Rubis implemented its country by country reporting, breaking down its profits, taxes and activities by tax jurisdiction and prepared its documentation on transfer pricing between Group companies (Transfer Pricing Documentation – Master File).

The Group does not have any subsidiaries that are not underpinned by economic activities (mainly local commercial operations). In particular, the Group's presence, via Rubis Énergie, in the Caribbean and the Channel Islands relates to the petroleum products distribution business; Rubis supplies these islands with the energy sources they need to operate and, for example, manages the largest distribution network of automotive fuel in the Caribbean Islands and Bermuda and distributes 100,000 m³ of petroleum products a year in the Channel Islands.

RESPECT FOR HUMAN RIGHTS

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

As a result, 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.

The Group's whistleblowing line, Rubis Integrity Line, which is in the process of being rolled out across all Group entities, enables not only Rubis employees, but also external and temporary workers, to report non-compliance with the rules, in strict confidentiality (see the Fighting corruption section on the previous page).

In addition, the Group ensures that health and safety protection systems are set up in subsidiaries (see section 2.3.2.1).

4.1.2 REQUIREMENTS FOR SUBCONTRACTORS AND SUPPLIERS NFIS

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

RESPONSIBLE PURCHASING POLICY

The Code of Ethics stipulates that employees have 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, as well as supplies used on Rubis Terminal's industrial sites, is governed by the Group's social and environmental policy (see section 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 the generation of waste without compromising safety. This is the case in the choice of heating by heat pump in newly constructed buildings for Rubis Terminal.

As a result, Rubis Terminal has set itself the target of having all orders fulfilled under terms containing a CSR criterion by 2020. Rubis Énergie, which does not have a centralized Purchasing Department, is considering setting a target.

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.).

4.2 COMMITMENT TO REGIONAL DEVELOPMENT NFIS

Committed towards local populations, Rubis' subsidiaries value 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 societal and sponsorship policy.

4.2.1 CLOSE RELATIONSHIPS WITH STAKEHOLDERS

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

The Group 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 (see section 2.3, which details the industrial safety measures implemented).



SRPP FIRE DRILL 2019

As it has done every year for nearly 25 years, the Société Réunionnaise des Produits Pétroles (SRPP) devoted one day to organizing a large-scale fire drill.

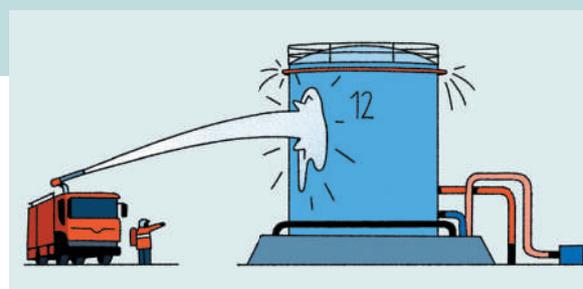
As a Seveso-classified company with security and business information objectives, the SRPP has an internal emergency plan to manage operational risks according to different predefined scenarios, called the Internal Operations Plan (POI), and an external emergency plan drawn up with the administration and the competent authorities, called the Specific Intervention Plan (PPI). The 2019 exercise provided an opportunity to test the PPI, which defines the public emergency resources to be deployed, under the authority of the Prefect, in the event of an accident for which the consequences extend beyond the site's boundaries.



This exercise thus enabled all the players involved, the SRPP, the SDIS (Departmental Fire and Rescue Service), the police, the town hall and state services (prefecture, sub-prefecture, DREAL, civil security) to activate the warning systems, to check the applicability of the procedures described in the Plans and to ensure good communication and coordination between the participants.

Thanks to the regular mobilization of the appropriate human and technical resources, these exercises are opportunities for SRPP staff to train and maintain a high level of knowledge and vigilance, with valuable and insightful feedback.

Philippe Collowald
Operations Director
SRPP



WHAT IS A PPRT?

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

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

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.

4.2.2 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 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 700 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 since, for instance, the Group operates roughly 400 gas stations in the Caribbean, and most are operated by independent managers.

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) and 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 is in addition to the Group's sponsorship activities.

4.2.3 THE GROUP'S SOCIETAL AND SPONSORSHIP ACTIVITIES

As an international group, Rubis has undertaken to become involved in each country in which it operates as an economic, social and cultural player.

As a responsible company, Rubis has a dual mission: carry out societal initiatives in 2 areas, health and education, and promote artistic creation through its cultural fund, Rubis Mécénat.

In 2019, the Group allocated €1,287,476 to the Rubis Sponsorship Department, of which €344,500 went to its societal initiatives and €942,976 to its cultural fund, Rubis Mécénat.

In response to the Group's desire to be fully involved in the regions where it operates and to contribute to their development, Rubis, in conjunction with each of its subsidiaries, supports multi-year projects of charitable associations working in the areas of education and health. These associations are chosen by each subsidiary in close collaboration with their teams to best meet requirements and local challenges. Each societal project is led internally by a single person or a committee of employees in partnership with the relevant association.

As well as offering financial support, Group employees participate in the work of the local non-profits, getting involved in sponsorship activities, raising money or taking part in local community events.



© Rubis Energia Portugal

Volta a Portugal – Cycling for a cause
Annual meeting of Rubis Energia Portugal as part of the sponsorship of the Portuguese cycling tour. 4,300 volunteers cycled 3,225 km at the Rubis Gás stand and collected almost €20,000 to support 3 associations selected by the teams at Rubis Energia Portugal.

Keen to be involved in all Group countries, Rubis extended support to 3 new regions in 2019: Kenya, Corsica and Togo, via its subsidiaries KenolKobil, Vito Corse and Eres Togo.

In parallel, Rubis organized an informal evening in the Paris region at which its employees could meet the associations supported by the Group in France in recent years: Viens lire au Louvre, Surf Insertion, Graines de Bitume and L'École à l'Hôpital. At this event, representatives presented their associations and chatted with Rubis employees about some of the issues they face. A second event will be organized in 2020 to exchange experiences once again.

In order to best respond to Group employee expectations, Rubis set up a call for charity projects in France in 2019 to allow employees to propose their favorite projects, to be supported by the Group from 2020 for a 2-year period. A Selection Committee has been set up; this will be repeated every 2 years.

These societal initiatives are led by the Rubis Group and are in addition to the societal commitments already conducted on the ground in each subsidiary.



© Graines de Bitume

Association Graines de Bitume for the social reintegration of young people on the streets of Antananarivo in Madagascar.



© Graines de Bitume



CLOSE-UP ON 4 OF OUR SOCIETAL PROJECTS

L'École à l'Hôpital

An association supported by Rubis in France since 2013

Created 90 years ago, L'École à l'Hôpital's mission is to organize the schooling of sick young people aged between 5 and 25 in the Paris region. This free teaching, adapted to demand and suited to all levels and needs, is provided in hospitals and at home by trained volunteer teachers. 4,281 sick young students took 23,804 lessons given by 475 volunteer teachers in the 2018-2019 school year.

SUPPORTING L'ÉCOLE À L'HÔPITAL MEANS HELPING ALMOST 4,000 YOUNG PEOPLE IN HOSPITAL TO CONTINUE THEIR STUDIES.



© William Leroy

"Despite my illness, my teachers were able to keep me focused and make these moments of study something to look forward to. Thanks to them, I can face my end of high school exams more calmly."

Anonymous beneficiary of L'École à l'Hôpital



© Nos Petits Frères et Sœurs

Donation of LPG

An initiative launched by Dinasa in Haiti

In 2019, Dinasa continued its sponsorship program launched in 2018, which supports needy schools by offering them subsidized propane, thus enabling them to offer their students at least one hot meal a day.

In 2019, aid was provided not only to schools in the capital but also in provincial towns. Some schools were also given equipment adapted to LPG.

"Thanks to the Dinasa grant, which covers installation and a monthly allocation of propane gas, we have stopped the use of coal, and food is cooked more quickly, much to the delight of our students."

Marie Sandra Edouard,
Vice-President,
Rose Mina de Diègue Foundation

THROUGH ITS WORK WITH A LARGE NUMBER OF SCHOOLS ACROSS THE COUNTRY, DINASA GIVES RECIPIENT HAITIAN CHILDREN ONE HOT MEAL EVERY DAY. IN 2019, 5,468 CHILDREN WERE RECIPIENTS OF THIS PROGRAM.



© Faraja Cancer Care



Faraja Cancer Support and KenolKobil Education Scholarship fund

Strong commitments in Kenya

Faraja Cancer Support was founded in 2010 with the aim of providing practical, emotional and therapeutic support to people with cancer as well as their friends and family. Faraja provides a complement to medical treatment through free additional therapies, support groups, art and music (Craft for Cure program) and medical and food support for children with cancer at Kenyatta National Hospital in Nairobi. The association offers a safe space to patients, giving them access to free services and enabling them to have a positive influence on the pathways of over 5,000 patients with cancer.

In 2019, KenolKobil organized a meeting with the association to raise awareness of cancer among its teams and introduce the association internally. Local employees took

part in a toy drive for patients and the end-of-year party for the Craft for Cure program, attended by some 400 children, was financed by the subsidiary.

To streamline its societal initiatives in Kenya, KenolKobil has set up a CSR Committee comprising several employees in order to develop and set up a coherent procedure that meets local needs.

At the same time as the support provided to Faraja Cancer Support, another societal project focusing on education will be launched in 2020. The KenolKobil Education Scholarship fund, which is fully supported by the subsidiary and its teams, provides financing for secondary and university level students from disadvantaged areas in the city, coupled with sponsorship sessions, internships and potential employment to students interested in the energy sector.

The KenolKobil team at a workshop organized by Faraja Cancer Support in 2019.

Toamasina Primary School

A school built and supported by Galana for children from local areas near depots in Toamasina, Madagascar

Education is the cornerstone of a country's development, yet more than 1.5 million children in Madagascar do not attend school or drop out after the first 3 years. School enrollment was just 39% in local areas near the Galana depots in Toamasina. As a civic-minded company, Galana decided to take action at grassroots level and to make a contribution to children's education with a long-term vision: providing children in disadvantaged areas with education, enabling them to become responsible men and women and stakeholders in the development of Madagascar.

BUILT BY GALANA, TOAMASINA PRIMARY SCHOOL GIVES ACCESS TO QUALITY EDUCATION TO THE 275 CHILDREN ENROLLED.



© Galana

"In 2019, we set up an IT room with 10 computers and a library. We have noticed that teaching additional subjects such as English, the environment, health, hygiene, values and drama lessons boosts student motivation. We will continue to supplement our initiatives to give each student what they need to progress."

Ruma Sungkur
Headmistress
Toamasina Primary School



RUBIS MÉCÉNAT: CORPORATE CULTURAL SPONSORSHIP

Since 2011, Rubis Mécénat has endeavored to develop a sponsorship policy that finds a place in the working lives of Rubis Group employees. Through commissions placed with local artists, such as in Réunion with SRPP and the Kid Kréol & Boogie association, the commissioning of photographer Geert Goiris' project on the industrial landscape in Europe, long-term socio-cultural programs developed in collaboration with local subsidiaries such as Easigas, Rubis Energy Jamaica and Vitogaz Madagascar, and internal artistic projects such as inviting the association LE M.U.R. to help create collaborative murals at Vitogaz in La Défense, the Group's cultural fund has over the years developed cultural projects that are customized according to local issues encountered by subsidiaries. Rubis Mécénat has helped enable some of these to become locally active social and cultural players. There will be many more projects to come, contributing to the development of the Group's sponsorship activities internationally.

Since 2011, Rubis Mécénat, the Rubis Group cultural fund, has promoted artistic creativity in all Group countries. The fund develops long-term artistic and social initiatives through educational programs on the visual

arts and design with young adults from disadvantaged communities in some Group countries. Parallel to this, it supports artists in France and abroad by commissioning works for specific locations and for the Group's industrial sites in association with cultural institutions. For each commission, Rubis Mécénat helps with the production of works and supports artists throughout the research and creation process. This support also entails long-term support, via the purchase of works and producing artists' publications and videos.

Three socio-cultural programs are currently being supported by Rubis Mécénat: Of Soul and Joy, a photography project in South Africa (since 2012), InPulse, a creative platform around the visual arts in Jamaica (since 2015), and Ndao Hanavao, a social design innovation lab in Madagascar (since 2018).

Through its commitment, Rubis Mécénat forges long-term links based on solidarity and trust. In going closer to those who are the furthest removed from art, Rubis Mécénat asserts its belief in its educational and societal virtues. This touches not only students, but also invites the local community to enter into constructive dialog on visual arts and design.

KEY FIGURES

OVER
150 YOUNG ADULTS
(aged 15-30) supported in its educational programs

OVER
60 STUDY GRANTS
awarded to young artists

16 ARTWORKS COMMISSIONED
from artists in France and abroad in collaboration with the cultural institutions and industrial sites of the Rubis Group

17 BOOKS
published on projects driven by Rubis Mécénat and artists supported by the cultural fund

and over **20** VIDEOS produced

OVER
100 WORKS OF ART
comprise the Rubis Mécénat collection and are exhibited in the offices of the Group and its subsidiaries



© Guillaume Muller

Commissioning of French artist Tania Mouraud.
With Frac Grand Large – Hauts-de-France and Rubis Terminal Dunkerque at the "Gigantisme – Art & Industrie" triennial Dunkirk - May 2019 – January 2021

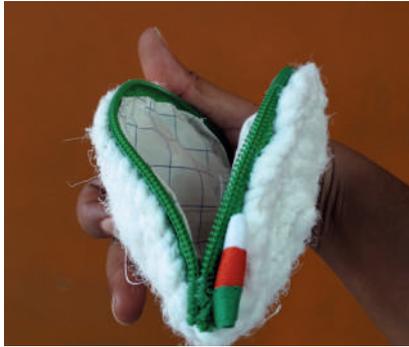
LONG-TERM SOCIO-CULTURAL PROGRAMS WITH GROUP SUBSIDIARIES

Ndao Hanavao,
a social design innovation lab

With Vitogaz Madagascar
(Antananarivo, Madagascar)

Ndao Hanavao (let's innovate) is a local initiative set up in 2018 by Rubis Mécénat in association with Vitogaz Madagascar in Antananarivo. An innovation and creation lab devised by designers and young Malagasy vocational trainees, together with local craftspeople, engineers and actors in the community, Ndao Hanavao seeks viable and sustainable solutions to some of the societal issues faced by very vulnerable sectors of the Malagasy population, through the creation of design objects.

For its first project, Ndao Hanavao invited 2 French designers from The Polyfloss Factory, Christophe Machet and Émile de Visscher, to develop the concept of their Polyfloss machine in Antananarivo and to set up a sustainable incubation, experimentation and training workshop to address the transformation of plastic waste, a major local issue.



© Carine Ratovonarivo



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"Madagascar is one of the richest countries in terms of raw materials. And yet, its inhabitants can no longer access this wealth, because the raw materials are sold abroad. Conversely, plastic is imported on a large scale and never leaves. It accumulates in dumps and on store shelves. Madagascar is being emptied of its wealth and filled up with plastics. How do we change this situation? How can we make this material a new resource that can be incorporated into traditional crafts and the Malagasy identity rather than grubby waste clogging up rivers, trees and overflowing trash cans? This is the challenge of the Ndao project."

Émile de Visscher,
designer,
The Polyfloss Factory, 2019



© Hentisoa Rafalia

As part of its commitment in Madagascar, Rubis Mécénat also supports the Malagasy artist Joël Andrianomearisoa.



© Patrice Sour

I Have Forgotten The Night
Pavillon Madagascar,
Venice Biennale, Italy
05/11/2019 – 11/24/2019



© Nile Sautler



© Daniel Anorak

InPulse,
a creative platform around the visual arts
With Rubis Energy Jamaica
(Kingston, Jamaica)

The InPulse program undertaken by Rubis Mécénat in collaboration with Rubis Energy Jamaica in 2015 in the community of Dunoon Park, in East Kingston, Jamaica, aims to promote Jamaican youth and improve the environment and life of young adults from local communities through the practice of visual arts as a positive means of expression. A creative platform and program for developing life skills, InPulse offers visual arts workshops run by local and international artists and general educational courses. InPulse introduces participants to the art market and its players. Each year, the project awards study grants to the most promising students to enable them to continue higher education at Kingston University.

© Aktem2



© Richard Lindo



**Of Soul and Joy,
a learning platform for photography**

**With Easigas
(Thokoza, Johannesburg,
South Africa)**

Of Soul and Joy is a long-term social and artistic initiative launched in 2012 by Rubis Mécénat and Easigas in Thokoza, a township located south-east of Johannesburg in South Africa, to transmit professional photography

skills to disadvantaged young people of the township and surrounding areas. It aims to teach young adults about photography as a means of expression, personal vocation and professional perspective. A visual platform, Of Soul and Joy offers workshops led by recognized photographers, meetings with participants in the art market, collaborations with cultural institutions and the organization

of art events in South Africa and abroad. Each year, the project awards study grants to the most promising students to enable them to access higher education at a university of their choice in Johannesburg. The program now attracts young photographers from various townships located around Johannesburg, thus extending its reach.



© Jabulani Dhlamini

In Thokoza, workshop "Magnum Photo" with Matt Black in 2017...

... and workshop with Yann Delacour in 2019.



© Jabulani Dhlamini





© Cyprien Clément-Delmas

Measures taken by Rubis Mécénat in light of the Covid-19 health crisis

In this period of global health crisis, Rubis Mécénat has set up various support measures as part of its socio-cultural programs in South Africa, Jamaica and Madagascar.

Schools and institutions closed their doors in all 3 countries, forcing us to pause our artistic workshops.

Young artists in training are thus confined to their homes, with health and safety recommendations to follow so as to get through this lockdown period as best they can.

In order to keep in touch, our local teams continue to work remotely with program beneficiaries each week, even carrying out artistic projects from their homes.

Together with the Group's subsidiaries, aid is gradually being provided to local communities to help young beneficiaries, as well as their families, protect themselves against this pandemic.

The often disadvantaged living conditions in townships, shanty towns and communities make

it hard to enforce a lockdown. For this reason, we are providing them with essential aid to help them live through this period and ensure they have the means to protect themselves against the spread of the virus:

- distribution of soap and disinfectant in all 3 countries;
- financial aid in Jamaica and Madagascar to meet the basic needs (rent, food, water, telephone) of our beneficiaries;
- food distribution in South Africa.

5

Methodological note

This section contains a methodological note and a cross-reference table 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.

5.1 CSR REPORTING SCOPE

5.1.1 ENVIRONMENTAL DATA

The consolidation scope for environmental information comprises those entities in which the Group holds a stake of at least 50% and which are included in the financial scope. The exact scope may vary depending on the environmental indicator, according to its relevance and the accounting methods applied (see section 5.2 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 and shipping at Rubis Énergie). The environmental impact (CO₂ emissions) of Group activities and CO₂ emissions relating to customers' end use of products have been assessed and published.

Unless otherwise indicated, the environmental data of acquired or created entities is integrated from the time that they enter the financial scope (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 financial scope.

5.1.2 SOCIAL DATA

The scope for employee relations reporting corresponds in principle 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 and support and services activities) and/or by geographic area.

Employee-related data from an acquired or created entity is consolidated on its entry into the financial scope (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 financial scope.

5.1.3 SOCIETAL/ETHICS DATA

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

Employee-related data from an acquired or created entity is consolidated on its entry into the financial scope (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 financial scope.



5.2 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.

For several years, the Group has been running a process to map significant environmental risks. The information used to identify, manage and monitor these risks is described in chapters 3 and 4 of this Universal Registration Document.

5.2.1 COMPARABILITY AND RELIABILITY OF INFORMATION

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

However, environmental performance is only comparable at 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 the absence of ratios.

In partnership with the Management of the subsidiaries concerned, a set of reporting standards for environmental and employee-related 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.

5.2.2 CONTROL MEASURES

The collected data are subject to consistency checks first at local level, and then by Rubis Énergie or Rubis Terminal at the functional department level and by the Rubis CSR Department. The consistency between the financial scope and the employee-related data is checked automatically at Rubis Énergie using the dedicated consolidation software, and by the Legal Department at Rubis Terminal.

5.2.3 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 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.

5.2.4 DATA REPORTING TOOLS

ENVIRONMENTAL DATA

As the various Group activities with specific environmental impact (see section 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.

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 activities): employee-related 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 is distributed to each relevant entity, and then centralized and consolidated by the Rubis Terminal functional departments.

SOCIETAL/ETHICS 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.



5.3 DEFINITIONS

Terms (in alphabetical order)	Definitions
1) Environmental information	
Bilan Carbone®	See definition of "Greenhouse gases (emissions)".
Carbon dioxide (CO₂)	<p>Rubis Terminal CO₂ 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 CO₂, by applying a conversion factor (kg/CO₂/GJ). CO₂ emissions generated by the transportation of personnel are included. CO₂ 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.</p> <p>Rubis Énergie Most distribution activities do not produce CO₂. They therefore do not require that an overall measuring system be set up at division level. In the refining activity, CO₂ 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.</p>
Energy consumption	<p>There is no imperative legal definition in this regard.</p> <p>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.</p> <p>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 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.</p>
Greenhouse gases (emissions)	Only carbon dioxide (CO ₂) is assessed, as Group activities do not generally involve other greenhouse gases (Annex II of Directive 2003/87/EC) (see definition of carbon dioxide). The CO ₂ emissions led to a carbon audit for which the scope is detailed in the "scope 1", "scope 2" and "scope 3" definitions.
Hazardous waste	<p>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.</p> <p>Rubis Énergie Most distribution activities 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 refining activity, waste amounts to the values declared during the year (time lag of one year).</p>
Nitrogen oxides (NO_x)	<p>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/Nm³ for boilers, depending on the fuel used, or 2 g/kWh for engines, in the absence of representative measurements.</p> <p>Rubis Énergie To the best of our knowledge, Rubis Énergie's distribution activities do not produce any NO_x. Therefore, an overall measuring system does not need to be set up at division level. In the refining activity, NO_x activities 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_x combustion turbines. The calculation is audited annually by a qualified independent body.</p>
Scope 1	Direct emissions from fixed and mobile facilities within the organizational scope, i.e. emissions from sources held or controlled by the organization, such as combustion generated by own industrial facilities or trucks, industrial processes, etc.
Scope 2	Indirect emissions from the generation of electricity, heat or steam purchased for the organization's activities.
Scope 3	Other emissions indirectly caused by the organization's activities that are not accounted for under scope 2 but are linked to the entire value chain such as the purchase of raw materials, services or other products, employee travel, upstream and downstream transportation of goods, management of waste generated by the organization's activities, use and end of life of products and services sold, capitalization of goods and production equipment, etc. The following items are included in scope 3 of Rubis' Bilan Carbone®: purchases of goods and services, fixed assets, upstream energy, upstream and downstream transportation of goods, waste generated, use of products sold.
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.
Suspended solids	<p>These are particles suspended in water, the nature of which depends on the activities carried out on the polluted site.</p> <p>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 its 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.</p> <p>Rubis Énergie Rubis Énergie's regular activities generate little specific water pollution. In the refining activity, suspended solids are analyzed and evaluated by the laboratory of the refinery, then audited by a qualified independent body.</p>

Terms (in alphabetical order)	Definitions
Volatile Organic Compounds (VOCs)	<p>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.</p> <p>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 refining activity, measurements of VOC emissions are the subject of a biennial sniffing campaign conducted by an accredited independent body.</p>
Water used	<p>This is standing water (e.g. reservoirs and lakes) or running water (e.g. rivers) above ground, sea water, 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.</p> <p>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.</p> <p>Rubis Énergie Most Rubis Énergie distribution operations do not require recurrent use of large quantities of water in industrial processes. In the refining activity, water consumption is measured on the basis of meter readings. The volume of water discharged corresponds to the value recorded by the meter at the exit of wastewater treatment.</p>
2) Employee relations information	
Absenteeism	Percentage of days missed (all categories of absence combined) as a percentage of total working days <i>per annum</i> .
Accident at work	<p>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 labour disruption (total or partial).</p> <p>Note:</p> <ul style="list-style-type: none"> for the Group's entities operating in France, the information includes employees' commuting accidents occurring off-site, in accordance with applicable law; for the Group's entities operating outside France, the inclusion or exclusion of employees' commuting accidents depends on local laws.
Annual number of hours worked	The number of hours worked per year may be calculated on the basis of a daily average established under prevailing law.
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.
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.
Employees	<p>This category includes:</p> <ul style="list-style-type: none"> full-time or part-time contracts, whether or not the work is done in shifts; in countries where this legislation applies: apprenticeship contracts and vocational training contracts. <p>This category does not include:</p> <ul style="list-style-type: none"> internship contracts; external service providers working for Group entities that have not signed an employment contract with the entity concerned; 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. <p>Expatriate employees or seconded employees as well as employees involved in intra-group mobility should be accounted for in the entity in which they effectively and usually work.</p>
Job categories	<p>To enable global harmonization of reporting, employees were distinguished as follows:</p> <p>Non-executives: non-executive and non Manager employees.</p> <p>Executives: employees:</p> <ul style="list-style-type: none"> with managerial duties and responsibilities, without being part of the General Management or a member of the Management Committee, or being a site Manager; or with the status of <i>cadre</i> (executive) under French law. <p>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.</p>
Number of days worked per year	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.
Unilateral decision	A decision taken unilaterally by the Management of the Group entity concerned, after discussion with the employee representatives, if applicable.

5.4 CROSS-REFERENCE TABLE

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

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

Topics	Chapter
Business model	1.2
Main non-financial risks relating to the company's activity	1.2.2
Description of policies and outcomes	
• Environment	2.2
• Social	3
Respect for human rights	4.1.1
Fighting corruption	4.1.1
Fighting tax evasion	4.1.1
Climate change, use of goods and services	2.2.2
Societal commitments	
• Sustainable development	4.2
• Circular economy	2.2.3
• Food waste	Not included
• Fighting food insecurity	Not included
• Respect for animal welfare	Not included
• Responsible, fair and sustainable food	Not included
• Collective agreements and impacts	3.3.2
• Fighting against discrimination and promoting diversity	3.1
• Measures to support disabled people	3.1.4

Given the nature of its activities, Rubis does not believe that these topics constitute a material risk and that there is any need to expand on them in this document



6

Report of the independent third party on the consolidated Non-Financial Information Statement included in the management report

This is a free translation into English of the independent third party's report issued in French and is provided solely for the convenience of English-speaking readers. This report should be read in conjunction with, and construed in accordance with, French law and professional standards applicable in France.

To the Shareholders,

In our capacity as independent third party, accredited by COFRAC number 3-1058 (scope available at www.cofrac.fr), and member of the Mazars network and one of the Company's Statutory Auditors, we hereby report to you on the consolidated non-financial statement for the year ended December 31, 2019 (hereinafter the "Statement"), included in the management report pursuant to the requirements of Articles L. 225-102-1, R. 225-105 and R. 225-105-1 of the French Commercial Code (*Code de commerce*).

THE ENTITY'S RESPONSIBILITY

The Management is responsible for preparing the Statement, including a presentation of the business model, a description of the principal non-financial risks, a presentation of the policies implemented considering those risks and the outcomes of said policies, including key performance indicators.

The Statement has been prepared in accordance with the Company's procedures (hereinafter the "Guidelines"), the main elements of which are presented in the Statement (and on request from the entity's head office).

INDEPENDENCE AND QUALITY CONTROL

Our independence is defined by the requirements of Article L. 822-11-3 of the French Commercial Code and the French Code of Ethics (*Code de déontologie*) of our profession. In addition, we have implemented a system of quality control including documented policies and procedures regarding compliance with applicable legal and regulatory requirements, the ethical requirements and French professional guidance.

RESPONSIBILITY OF THE INDEPENDENT THIRD PARTY

On the basis of our work, our responsibility is to provide a report expressing a limited assurance conclusion on:

- the compliance of the Statement with the requirements of Article R. 225-105 of the French Commercial Code;
- the fairness of the information provided in accordance with Article R. 225-105 I, 3° and II of the French Commercial Code, *i.e.* the outcomes, including key performance indicators, and the measures implemented considering the principal risks (hereinafter the "Information").

However, it is not our responsibility to comment on the entity's compliance with other applicable legal and regulatory requirements, in particular anti-corruption and tax avoidance legislation nor on the compliance of products and services with the applicable regulations.

NATURE AND SCOPE OF OUR WORK

The work described below was performed in accordance with the provisions of Articles A. 225-1 et seq. of the French Commercial Code, as well as with the professional guidance of the French Institute of Statutory Auditors ("CNCC") applicable to such engagements, and with ISAE 3000⁽¹⁾:

- we obtained an understanding of all the consolidated entities' activities and the description of the principal risks associated;
- we assessed the suitability of the criteria of the Guidelines with respect to their relevance, completeness, reliability, neutrality and understandability, with due consideration of industry best practices, where appropriate;
- we verified that the Statement includes each category of social and environmental information set out in Article L. 225-102-1 III as well as information regarding compliance with anti-corruption and tax avoidance legislation;
- we verified that the Statement provides the information required under Article R. 225-105 II of the French Commercial Code, where relevant with respect to the principal risks, and includes, where applicable, an explanation for the absence of the information required under Article L. 225-102-1 III, paragraph 2 of the French Commercial Code;
- we verified that the Statement presents the business model and a description of principal risks associated with the entity's activity all the consolidated entities' activities, including where relevant and proportionate, the risks associated with their business relationships, their products or services, as well as their policies, measures and the outcomes thereof, including key performance indicators associated to the principal risks;
- we referred to documentary sources and conducted interviews to:
 - assess the process used to identify and confirm the principal risks as well as the consistency of the outcomes, including the key performance indicators used, with respect to the principal risks and the policies presented, and
 - corroborate the qualitative information (measures and outcomes) that we considered to be the most important⁽²⁾; concerning risks of anti-bribery fight and climate change, our work was carried out on the consolidating entity, for the others risks, our work was carried out on the consolidating entity and on a selection of entities;
- we verified that the Statement covers the scope of consolidation, i.e. all the consolidated entities in accordance with Article L. 233-16 of the French Commercial Code within the limitations set out in the Statement;
- we obtained an understanding of internal control and risk management procedures the entity has put in place and assessed the data collection process to ensure the completeness and fairness of the Information;
- for the key performance indicators and other quantitative outcomes that we considered to be the most important⁽³⁾, we implemented:
 - analytical procedures to verify the proper consolidation of the data collected and the consistency of any changes in those data;
 - tests of details, using sampling techniques, in order to verify the proper application of the definitions and procedures and reconcile the data with the supporting documents. This work was carried out on a selection of contributing entities⁽⁴⁾ and covers between 26% and 100% of the consolidated data relating to the key performance indicators and outcomes selected for these tests;
- we assessed the overall consistency of the Statement based on our knowledge of all the consolidated entities.

We believe that the work carried out, based on our professional judgement, is sufficient to provide a basis for our limited assurance conclusion; a higher level of assurance would have required us to carry out more extensive procedures.

MEANS AND RESOURCES

Our work was carried out by a team of 6 people between December 2019 and April 2020 and took a total of 6 weeks.

We conducted a dozen interviews with people responsible for preparing the Statement, representing in particular the Compliance & CSR Department.

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

(2) **Ethics information:** implementation of the compliance programme.

(3) **HR information:** Total workforce at end of period, male/female breakdown; Absenteeism; Number of hours of training, including security-related training; Frequency rate of accidents at work; Number of occupational diseases.
Environmental information: Energy consumption; Water consumption; Releases to water; VOC emissions; CO₂ emissions (industrial activities and products sold).

(4) Rubis Énergie / Easigas – HR information; Rubis Énergie / SARA – HR and environmental information; Rubis Énergie / Portugal – HR information; Rubis Énergie / Vitogaz Switzerland – HR information; Rubis Terminal / Rotterdam – HR and environmental information; Rubis Terminal / Strasbourg – environmental information.

CONCLUSION

Based on the procedures performed, nothing has come to our attention that causes us to believe that the consolidated Non-Financial Information Statement is not presented in accordance with the applicable regulatory requirements and that the Information, taken as a whole, is not presented fairly in accordance with the Guidelines, in all material respects.

COMMENTS

Without modifying our conclusion and in accordance with Article A. 225-3 of the French Commercial Code, we have the following comments:

- Hazardous waste and consolidated VOC emissions are published on a periodicity offset by one year: the published values correspond to the 2018 financial year, on all the French sites, in Antwerp, Rotterdam and Dörtyol (Turkey).
- Rubis measures its carbon impact and has integrated a goal of reducing the carbon intensity of its activities into the variable compensation criteria of the Management. The Company is not in a position at this stage to present quantified targets for medium and long-term reduction of greenhouse gas emissions.

Paris-La Défense, April 24, 2020

Independent third party

MAZARS

Edwige REY

CSR and Sustainable Development Partner



Original illustrations

Vincent Mahé

Photo credits

(unless specified)

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Head Office

46, rue Boissière - 75116 Paris
784 393 530 RCS Paris
Tel: +33 (0)1 44 17 95 95

Investor Relations

Tel: +33 (0)1 45 01 99 51



Once upon a time, in the land of the indomitable Gauls, Blake and Mortimer, adventurous as Tintin, intrepid as Michel Vaillant and inseparable as Lucky Luke and Jolly Jumper, fell under the spell of the magic potion of strategy.

Since 1990, the year Largo Winch was born, Rubis has gathered together, in a fantasy world, a faithful band of Smurfs, fortunately more close-knit than the Blue Tunics, and more motivated but just as creative as Gaston Lagaffe, around strong values which they spread across the world through their motto:

**THE WILL TO UNDERTAKE,
THE CORPORATE COMMITMENT**