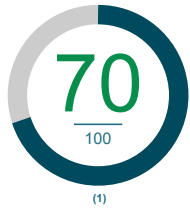


## Company and Sector Performance

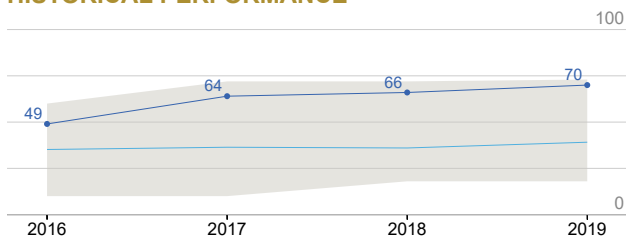
### ESG OVERALL SCORE



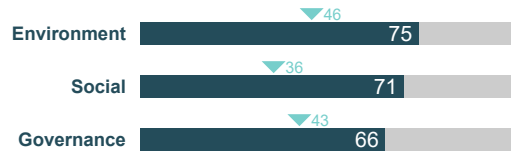
Rank in Sector	2/46
Rank in Region	7/1598
Rank in Universe	7/4907
Company Reporting Rate	94%
Sector Average Reporting Rate	72%
Cooperation level (2)	Responsive

**High severity controversies** Yes

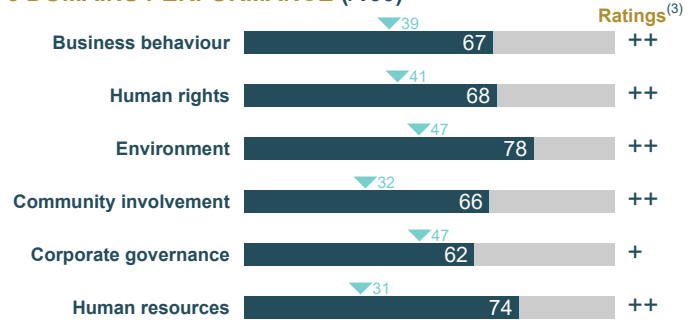
### HISTORICAL PERFORMANCE



### ESG PERFORMANCE (/100)



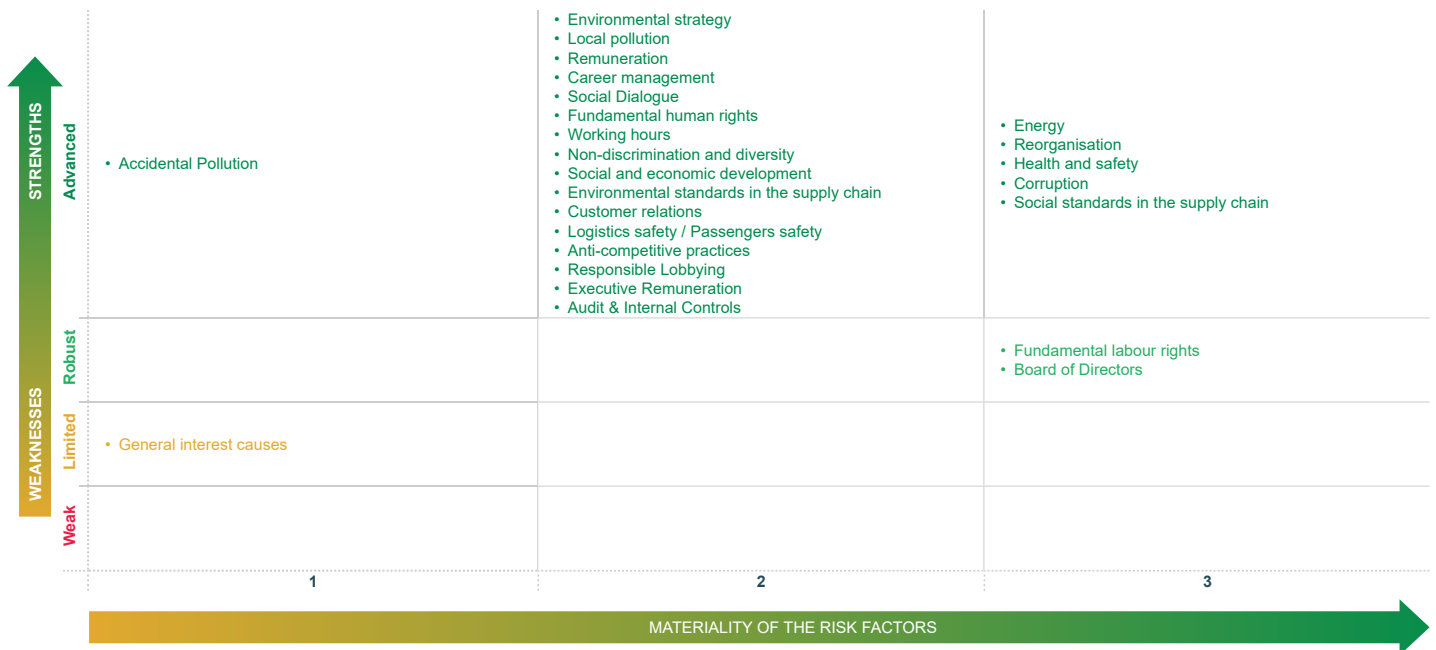
### 6 DOMAINS PERFORMANCE (/100)



Company inclusion in Vigeo Eiris indices(4): No

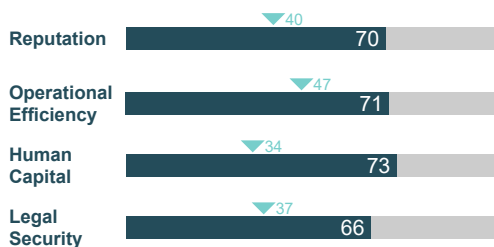
## Management of risks and opportunities

### MATERIALITY & PERFORMANCE MATRIX



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**RISK MITIGATION INDEX (/100)**



**ANALYST FOCUS**

TOPIC	COMMENT	TREND
Reorganisation	SNCF Réseau is undergoing a strategic change of its whole organisation. A framework agreement with employee representatives is in place to manage responsibly and with the involvement of employee representatives. Extensive measure are also in place such as SNCF's mobility programme.	↗
Business Ethics	CSR issues are discussed at Board level and relevant processes are dedicated to the management of CSR risks such as risk mapping. Moreover, the internal control system covers most for the Company's CSR risks. However, there is no CSR committee and the Head of the CSR department does not report directly to the CEO nor to the Board.	↗
CSR in Governance	SNCF has a formalised commitments to prevent corruption, anti-competitive practices and ensure the transparency and integrity of lobbying practices. These commitments are backed up with exhaustive measures such as a dedicated confidential hotline or email address covering all business ethics issues. No corruption or antitrust cases were reported in the last five years.	↘
Controversies	During the period under review, the Company has been subject to two controversies of high severity regarding passengers / logistics safety. SNCF Réseau was remediative and non-communicative on the other.	

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## Carbon Footprint and Energy Transition\*

"The Carbon Footprint & Energy Transition research provides an assessment of a company's carbon footprint combined with the strategy to manage risks and opportunities related to the transition to a low carbon economy. NI (No Info) is used to indicate that the information is not available."

### CARBON FOOTPRINT



SCALE	EMISSIONS (T CO2 EQ)	CATEGORIES
A	<100 000	Moderate
B	>= 100 000 and <1 000 000	Significant
C	>= 1 000 000 and <10 000 000	High
D	>= 10 000 000	Intense

### ENERGY TRANSITION SCORE



ENERGY TRANSITION SCORE	CATEGORIES
60-100	Advanced
50-59	Robust
30-49	Limited
0-29	Weak

## Goods and services contributing to sustainable development\*

"Sustainable Goods & Services research provides a positive screening on companies to identify business activities devoted to sustainable solutions."



INVOLVEMENT	CATEGORIES
>=50%	Major
20-49%	Significant
0-19%	Minor
0%	None

## Involvement in controversial activities\*

"The Controversial Activities research provides screening on companies to identify involvement in business activities that are subject to philosophical or moral beliefs."

Involvement in controversial activities: No Involvement Identified

### Screened Areas:

- Alcohol
- Animal welfare
- Chemicals of concern
- Civilian firearms
- Fossil fuels
- Gambling
- Genetic engineering
- High interest rate lending
- Military
- Nuclear power
- Pornography
- Reproductive medicine
- Tobacco

(1) Performance level: weak (0-29/100), limited (30-49/100), robust (50-59/100), advanced (60-100/100)  
 (2) Cooperation level on a 4-level scale: proactive, responsive, partially responsive, not responsive  
 (3) Ratings outline companies' benchmarked domain performance within a sector, on a 5-level scale: "-", "=", "+", "++", "+++"  
 (4) Indices: based on the most recent indices at the date of publication. More details on vigeo-eiris.com.

## Company performance in all the Sustainability Drivers

			Overall score 70/100				Trend	Score	Leadership	Implementation	Results
			<b>Environment</b>			→	78	83	97	29	
E	ENV2.2	3	Energy			↗	68	65	100	38	
E	ENV1.1	2	Environmental strategy			→	100	100	100	N/A	
E	ENV2.6	2	Local pollution			→	76	100	100	28	
E	ENV1.2	1	Accidental Pollution			↗	70	65	79	65	
			<b>Human Resources</b>			→	74	87	85	52	
S	HRS2.3	3	Reorganisation			↗	81	79	83	81	
S	HRS3.2	3	Health and safety			↗	65	100	79	17	
S	HRS1.1	2	Social Dialogue			→	90	83	100	88	
S	HRS2.4	2	Career management			↗	67	79	83	39	
S	HRS3.1	2	Remuneration			↗	85	90	100	65	
S	HRS3.3	2	Working hours			→	60	90	69	22	
			<b>Human Rights</b>			→	68	85	55	65	
S	HRT2.1	3	Fundamental labour rights			↘	55	79	20	65	
S	HRT1.1	2	Fundamental human rights			↗	74	79	79	65	
S	HRT2.4	2	Non-discrimination and diversity			→	83	100	83	65	
			<b>Community Involvement</b>			→	66	67	69	63	
S	CIN1.1	2	Social and economic development			→	75	76	65	85	
S	CIN2.2	1	General interest causes			→	48	48	76	20	
			<b>Business Behaviour (C&amp;S)</b>			↗	67	79	74	51	
S	C&S2.4	3	Social standards in the supply chain			→	69	86	79	43	
G	C&S3.1	3	Corruption			↗	76	76	76	77	
S	C&S1.1	2	Logistics safety / Passengers safety			↗	63	93	77	20	
S	C&S1.3	2	Customer relations			→	67	79	86	35	
E	C&S2.3	2	Environmental standards in the supply chain			→	62	65	79	43	
G	C&S3.2	2	Anti-competitive practices			→	64	65	51	77	
G	C&S3.3	2	Responsible Lobbying			↗	66	83	67	49	
			<b>Corporate Governance</b>			→	62	56	57	73	
G	CGV1.1	3	Board of Directors			↘	52	23	70	63	
G	CGV2.1	2	Audit & Internal Controls			→	69	62	65	79	
G	CGV4.1	2	Executive Remuneration			↗	71	100	30	83	

■ Weak (0-29/100)
 ■ Limited (30-49/100)
 ■ Robust (50-59/100)
 ■ Advanced (60-100/100)



Involvement in allegations



Involvement in allegations with evidence of corrective measures

## Benchmark Position versus sector peers

Position versus sector peers		Environment	Human resources	Human rights	Community involvement	Business behaviour (C&S)	Corporate governance	Overall Score
FR0000476087	La Poste	++	++	++	++	++	+	73
<b>XS0096412548</b>	<b>SNCF Réseau</b>	<b>++</b>	<b>++</b>	<b>++</b>	<b>++</b>	<b>++</b>	<b>+</b>	<b>70</b>
IT0003796171	Poste Italiane	+	++	++	++	++	++	66
FR0010340141	Aéroports de Paris	++	++	++	++	++	=	64
IT0003506190	Atlantia	+	+	+	+	++	+	56
GB00BDVZY277	Royal Mail	=	+	+	++	+	++	55
DE0005552004	Deutsche Post DHL	+	+	+	+	+	+	52
XS0954248729	Ferrovie Dello Stato	++	=	=	++	+	+	52
XS0399674216	Luchthaven Schiphol	++	+	=	+	+	++	52
BE0974268972	bpost	+	+	+	++	+	+	51
FR0000039299	Bolloré	=	++	+	+	+	=	48
DE0005773303	Fraport	+	=	=	+	+	=	46
PTBRI0AM0000	Brisa	=	=	++	++	+	=	45
XS0969593549	Network Rail	+	=	+	+	+	+	45
XS0554975325	Deutsche Bahn	+	=	+	+	+	=	44
DE000HLA475	Hapag-Lloyd	=	+	=	-	+	=	43
NL0009739416	PostNL	=	=	+	=	=	+	42
FR0010533075	GetLink	-	=	=	=	+	+	41
DK0010244508	A.P. Moller-Maersk	=	=	+	=	=	=	40
AT0000APOST4	Oesterreichische Post	+	=	=	=	=	=	39
US189909AC82	CMA CGM	+	=	=	=	+	-	38
FR0011050764	APRR	+	=	=	=	=	=	37
DE000A1DAHH0	Brenntag	-	=	=	=	+	=	37
ES0105046009	Aena SME	+	=	=	=	=	=	36
XS0383001996	Heathrow Airport Holdings	+	=	=	+	=	=	36
IT0003201198	SIAS	=	-	=	=	=	+	36
CH0025238863	Kuehne + Nagel International	=	=	=	=	=	=	35
CH0002168083	Panalpina Welttransport (Holding) AG	=	-	-	-	=	+	35
GB00BMMV6B79	Clipper Logistics	-	=	+	=	=	+	34
DK0060079531	DSV, De Sammensluttede Vognmaend	-	=	=	-	=	+	33
CH0319416936	Flughafen Zurich	+	-	-	-	=	=	32
XS1072141861	ADIF-Alta Velocidad	=	=	=	=	=	-	31
FR0010929125	Id Logistics Group	=	=	=	=	-	=	31

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Position versus sector peers		Environment	Human resources	Human rights	Community involvement	Business behaviour (C&S)	Corporate governance	Overall Score
GB0030329360	Wincanton	-	-	=	=	-	+	31
GB00B1FP8915	BBA Aviation	-	-	-	=	=	+	30
IT0005176406	Enav	-	=	=	=	=	=	29
XS0375220588	DAA	=	-	-	=	-	=	28
XS0520578096	ÖBB-Infrastruktur AG	=	-	-	-	=	-	28
GB0003395000	James Fisher and Sons	-	-	=	-	-	=	27
GB0002018363	Clarkson	-	-	-	-	-	+	25
BE0003808251	Exmar	-	-	=	-	-	-	25
IT0001006128	Aeroporto Guglielmo Marconi Di Bologna	+	-	-	-	-	-	24
XS0790003023	ASFINAG	-	-	-	-	-	--	20
BE6254681248	Brussels Airport Holding	+	-	-	-	-	--	20
MHY2065G1219	DHT Holdings	-	-	-	-	-	-	20
MHY0017S1028	Aegean Marine Petroleum Network	--	-	-	-	-	-	18

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## General information

SNCF Réseau is the operator of the French railway system and is responsible for the management and maintenance of the railway network. On July 12th 2018,

a new corporate project named "Nouvel'R" has been launched, which aim to change the whole organisation of SNCF Réseau.

## Selected financial data

Key data	Revenues	EBIT	Employees
2018	EUR 6,301m	EUR (2,773)m	54,097
2017	EUR 6,496m	EUR 1,099m	54,299
2016	EUR 6,441m	EUR 1,016m	54,476
2015	EUR 6,264m	EUR (8,648)m	54,118
2014	EUR 6,464m	EUR 1,153m	1,678

Main shareholders	2019
French State	100%

Geographical Breakdown	Turnover 2018	Employees
France	100%	100%

Main economic segment	Turnover 2018
French National Rail Network	100%

## Selected ESG Indicators

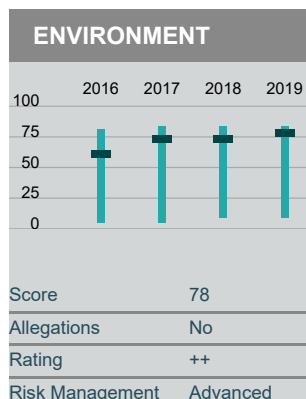
	2019	2018
Non-executive Board member(s) responsible for CSR issues	No	No
Executive remuneration linked to CSR performance	N/A	Yes
3-year energy consumption trend (normalized to turnover)	N/A	↘
Ratio of payments to employees vs. shareholders (3-year trend)	N/A	↘
Percentage of independent Board members	0	0
Percentage of women on Board	50	50
Percentage of women in Executive team	N/A	12
Percentage of women in workforce	N/A	13
Transparency on lobbying budget	N/A	Yes
Percentage of employees covered by collective agreements on working conditions	N/A	100
3 year trend for safety at work	N/A	↘
Involvement in armament	No	No
Transparency on payment of tax	N/A	Full
Management of social risks in supply chain	N/A	Advanced

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■ Sector performance  
 ■ Company performance  
 Rating : min-- / max ++

## CSR performance per criterion



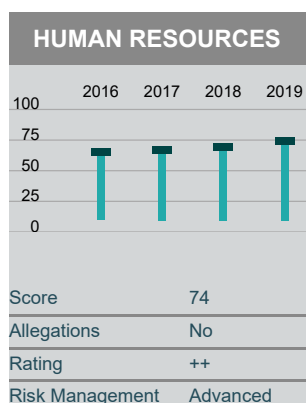
### Key issues

Companies in the Transport and Logistics sector are expected to define a solid and comprehensive environmental strategy given the major impacts their operations and processes have on the environment. Indeed, this sector is responsible for approximately 25% of the total CO2 emissions increasing pressure on such companies to offer low environmental impact services. Thus, minimising the environmental impacts from energy use is identified as a key issue.

### Company performance

- SNCF Reseau's absolute performance in the Environment domain is advanced, in line with the previous review.

- The Company's environmental strategy covers all its responsibilities in terms of environmental protection and comprehensive resources are allocated to environmental management, including ISO 14001 certification covering all its production sites. Regarding its energy use, SNCF Reseau has put in place comprehensive measures, such as the use and production of alternative energy sources. The Company's energy consumption and CO2 emissions normalised to sales have decreased in the 2016-2018 period. Regarding pollution prevention and control, SNCF Reseau has allocated comprehensive resources such as training and risk assessment. Lastly, concerning local pollution, the Company engages with external bodies and developed comprehensive measures such as programmes to reduce local pollution, in order to uphold its commitment to this issue.



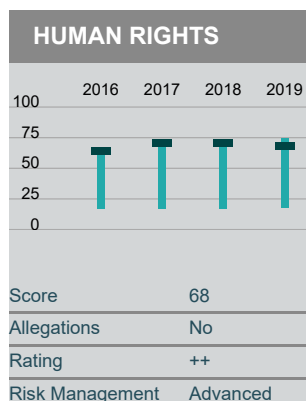
### Key issues

The Transport and Logistics sector is driven by restructuring changes which can have critical impacts on human resources aspects and thus placing reorganisations as a major issue for such companies. Labour relations are of particular importance as well, as the processes of technological change, deregulation, and privatisation have reduced the unionised workforce. Also, workers' health and safety represents another key issue given the nature of the activities of the sector that exposes workers to health and safety problems such as accidents, exposure to toxic substances, and repetitive movements.

### Company performance

- SNCF Reseau's absolute performance in the Human Resources domain is advanced, which is in line with the previous review.

- The Company has issued formalised commitments to all issues under review. They are supported by comprehensive measures such as a company-wide representative body for the promotion of labour relations, re-training to limit the impacts of reorganisation, career counselling interviews and training leading to certifications and degrees to promote career management, a verifiable remuneration framework for its quality of remuneration systems, an OHSAS 18001 certification covering all industrial sites to improve of health and safety, and employee satisfaction survey for the management of working hours. SNCF Reseau does not appear to disclose indicators linked to its subcontractors.



### Key issues

Ensuring the respect of fundamental labour rights is crucial for the Transport and Logistics sector, and companies are expected to set policies and install solid social dialogue platforms in place especially when their operations are beyond the country of origin. Non-discrimination is another key challenge as such jobs have, historically, been male-dominated and face shortages related to ageing workforce as well as difficulty of the integration of persons with disabilities.

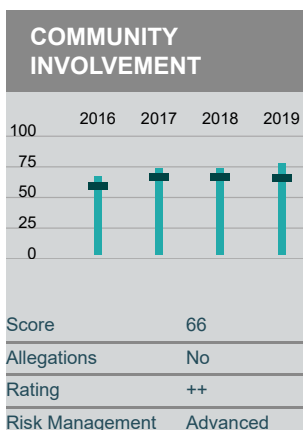
### Company performance

- SNCF Reseau's absolute performance in the Human Rights domain is advanced, which is in line compared to the previous review.

- The Company has issued highly relevant formalised commitments to all issues under review and employees are always directly involved in the implementation. Measures can be found, such as external verifications for the respect and promotion of human rights, informing and enabling employees to exercise their trade unions rights, and affirmative action programmes to promote diversity. An increase in the share of women in management positions and of employees with disabilities is noted for the 2014-2018 period.

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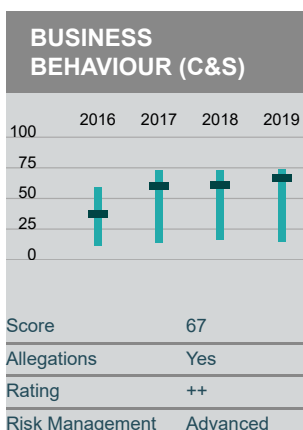


### Key issues

Given the growing importance of infrastructure as a backbone of the global economy, railway infrastructure operators can actively contribute to the development of the regions hosting their operations through social and economic development endeavours. In this sense, these companies are expected to increase and ease mobility through development of infrastructure.

### Company performance

- SNCF Réseau's absolute performance in the Community Involvement domain is advanced, in line with the previous review.
- The Company has issued a formalised commitment to promote social and economic development addressing its main responsibilities, including the promotion of transport infrastructures. Measures such as actions to improve social integration and support of sustainable mode of transportation are also in place to support SNCF Réseau's commitments in this area. Moreover, indicators of social and economic development have been improving in the 2016-2018 period. Regarding its contribution to general interest causes, the Company is part of the SNCF association and follows its strategy aimed towards education and culture. Significant means are in place, such as pro bono work and the contributions made have been stable in the 2016-2018 period.

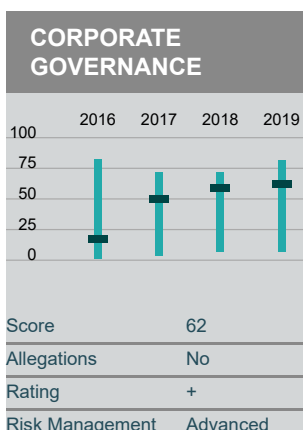


### Key issues

The prevention of corruption and social factors in the supply chain are considered among the main issues for the Transport and Logistics sector in terms of business behaviour. Indeed, such companies often interact with other large companies or public authorities, highlighting the business integrity challenge while outsourcing might result in cost efficiency at the expense of violating basic human and labour rights at the supply chain level.

### Company performance

- SNCF Réseau's absolute performance in the Business Behaviour domain is advanced and has increased compared to the previous review.
- Improvements can be found in the Company's management of logistics and passengers safety, as SNCF Réseau appears to have issued a formalised commitment, adopting a preventive approach and setting targets. Moreover, a comprehensive system to ensure passengers and logistics safety appears to be in place, with measures such as internal and external audits. SNCF Réseau has issued formalised commitment to all issues at stake, with measures such as information on company duties towards customers, risk assessments for suppliers on environmental and social issues, a dedicated confidential hotline or email address for corruption, anti-competition and lobbying. However, the Company lacks disclosure on the coverage of environmental and social audits conducted and the share problems uncovered.
- The Company is involved in two controversies, on which it is overall reactive.



### Key issues


Sound corporate governance is required to oversee a company's strategic direction, including the CSR strategy. Directors are notably evaluated on their level of diversity and experience with operational, financial, and CSR topics. The audit and internal controls system is examined regarding the efficiency and reach of its risk management. Executive remuneration is assessed for transparency and alignment with balanced stakeholder interests.

### Company performance

- SNCF Réseau's absolute performance in the Corporate Governance domain is advanced, in line with the previous review.
- The Company has formalised its corporate governance framework, covering most of the relevant features and the majority of Board members are non-executive directors. Moreover, The Board of Directors diversity appears to be advanced. The Audit committee still has a comprehensive role and the relevant processes dedicated to the management of CSR risks. Regarding executive remuneration, the ratio of CEO compensation vs. the average employee salary has decreased in the 2016-2018 period.

## CSR performance per criterion

### Detailed Analysis

<b>Environment</b>	<b>13</b>
ENV1.1 Environmental strategy	13
ENV1.2 Pollution prevention and control (soil, accident)	15
ENV2.2 Minimising environmental impacts from energy use	17
ENV2.6 Management of local pollution	19
<b>Human resources</b>	<b>21</b>
HRS1.1 Promotion of labour relations	21
HRS2.3 Responsible management of reorganizations	23
HRS2.4 Career management and promotion of employability	25
HRS3.1 Quality of remuneration systems	27
HRS3.2 Improvement of health and safety conditions	29
HRS3.3 Respect and management of working hours	32
<b>Human rights</b>	<b>34</b>
HRT1.1 Respect for human rights standards and prevention of violations	34
HRT2.1 Respect for freedom of association and the right to collective bargaining	36
HRT2.4 Non-discrimination	38
<b>Community involvement</b>	<b>41</b>
CIN1.1 Promotion of the social and economic development	41
CIN2.1 Promotion of access to postal services	44
CIN2.2 Contribution to general interest causes	45
<b>Business behaviour (C&amp;S)</b>	<b>47</b>
 C&S1.1 Logistics safety / Passengers safety	47
C&S1.3 Responsible customer relations	49
C&S2.3 Integration of environmental factors in the supply chain	51
C&S2.4 Integration of social factors in the supply chain	53
C&S3.1 Prevention of corruption	55
C&S3.2 Prevention of anti-competitive practices	57
C&S3.3 Transparency and integrity of influence strategies and practices	59

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<b>Corporate governance</b>		<b>61</b>
CGV1.1	Board of Directors	61
CGV2.1	Audit & Internal Controls	64
CGV3.1	Shareholders	66
CGV4.1	Executive Remuneration	67

 Involvement in allegations     Involvement in allegations with evidence of corrective measures

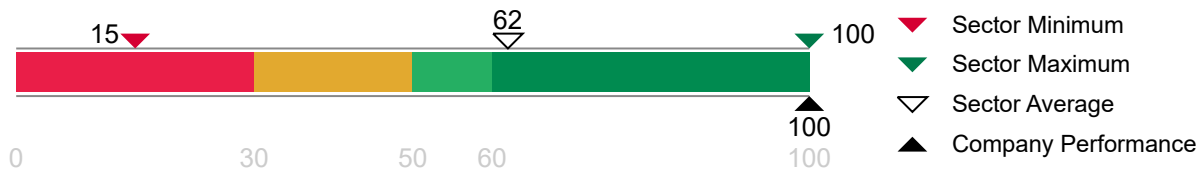
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Environment

Score: 78

ENV1.1 Environmental strategy

(score: 100, weight: 2)



Visibility of commitment to environmental issues

The company has issued a formalised commitment to environmental protection, in its Ethical Charter, and sets specific targets to reduce its GHG emissions and its energy consumption as well as noise issues. The company is a signatory of the Global Compact and communicates on this principle.

Relevance of environmental strategy

The company commits to all its responsibilities in terms of environmental protection:

- Pollution prevention and control
- Minimising environmental impacts from energy use
- Management of local pollution

Ownership of commitment

The commitment applies throughout the company and is supported by senior management. In addition, the Environment and Sustainability Department in charge of defining the strategic orientations of the company in terms of sustainability (including environment), moreover the company joined the Science Based Targets and is being accompanied by WWF France. The company is also in partnership with "France nature environnement" and "Ligue de protection des oiseaux".

Means allocated to environmental management

The company has allocated comprehensive resources to environmental management.

- Environmental manual specifying procedures and responsibilities
- Internal audits that assess the effectiveness of the EMS
- Management review of the EMS (at Executive Level)
- Environmental performance measured against targets
- External verification of reporting on environmental performance

- Environmental manual specifying procedures and responsibilities; Internal audits that assess the effectiveness of the EMS: The company adopted the ISO 14001 environmental management system and International Energy Efficiency Certificate (IEEC) which are based on conducting Internal audits to assess the effectiveness of the EMS and Environmental manual specifying procedures and responsibilities.  
 - Management review of the EMS (at Executive Level): The "Comex" ( Strategic Energy Committee) is composed of six senior executives that reviews the EMS that are in place in the company, and the environmental KPIs. Moreover, operational management reviews are carried out at the level of the each directors of establishment.  
 - Environmental performance measured against targets: Each month the "Comex Committee" evaluates environmental performance and measures them against the company's targets.  
 - External verification of reporting on environmental performance: PwC verified the reporting on environmental performance.

**Coverage of certified environmental management systems**

*In the company's answers to Vigeo Eiris, it state that 100% of its production sites are certified ISO 14001.*

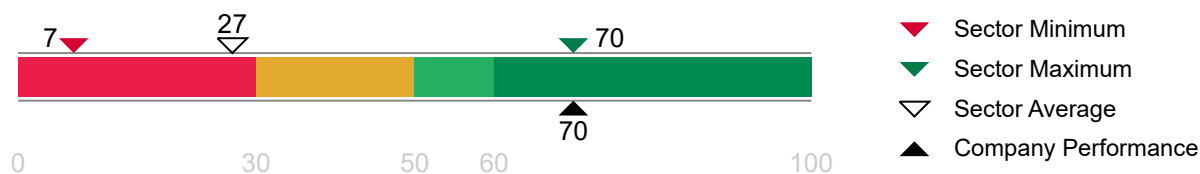
<b>Leadership</b>	<b>100</b>
Visibility	100
Relevance	100
Ownership	100

<b>Implementation</b>	<b>100</b>
Means & resources	100
Coverage	100

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**ENV1.2 Pollution prevention and control (soil, accident)**

(score: 70, weight: 1)



**Relevance of commitments on pollution prevention and control**

The company's commitments take into account accidental pollution prevention throughout the life-cycle of its products/services.

**Means allocated to pollution prevention and control**

Comprehensive resources are reported to be allocated to pollution prevention and control:

- Pollution control audits
- Training
- Risk assessment/identification studies
- Implementation of risk prevention procedures (emergency plans, simulation exercises)

- *Training: Training sessions on environmental issues and best practices are provided by the Kisio consultancy firm, that program also covers the topic of pollution prevention of water and soil.*  
 - *Risk assessment/identification studies and Implementation of risk prevention procedures: During the conception phase, SNCF Réseau conducts environmental assessment studies in order to integrate environmental aspects within the principles of avoidance, reduction and compensation and takes the necessary measures to prevent pollution risks. The estimated costs of these measures ranges approximately from 4% to 7% of the total cost of the project.*

**Coverage**

The company has allocated resources to pollution prevention and control throughout the company.

**Stakeholders' feedback**

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

*As of 09/2019, SNCF Réseau did not appear to be involved in any controversy related to this sustainability driver.*

**Rehabilitation of polluted soil**

In addition to a historical review of its polluted soil and remediation and control measures, the company has already carried-out clean-up processes.

*SNCF Réseau has informed Vigeo Eiris that the management of polluted soils is under the responsibility of SNCF Immobilier (part of SNCF Group). SNCF Immobilier acts on behalf of SNCF Réseau when conducting soil pollution review and clean-up processes.*

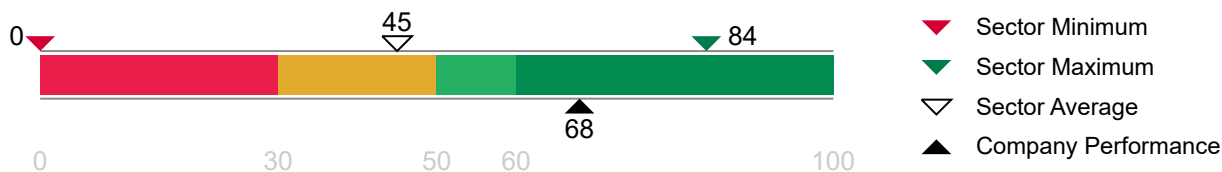
Leadership	65	Implementation	79	Results	65
Relevance	65	Means & resources	65	Performance	65
		Coverage	100	Trends	65

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**ENV2.2 Minimising environmental impacts from energy use**

(score: 68, weight: 3)



**Relevance of the company's commitment in terms of reducing its energy consumption.**

The company has set quantified targets with regard to its energy consumption, and these cover the entire group.

*The company aims to reduce its energy consumption by 25% by 2025 compared to 2015 levels.*

*Of note, the company has set a target for 2025 to developing at least 100 acres of photovoltaic farms on the company's land by 2025, as part of the commitments "place au soleil" plan, which is an engagement with the french state.*

**Relevance of the company's commitment in terms of reducing its energy-related emissions.**

The company has set quantified targets with regard to its energy-related emissions, and these cover the entire group.

*The company aims to reduce its GHG emissions by 25% by 2025 compared to 2015 levels.*

**Means allocated.**

The company uses innovative measures compared to its peers in order to reduce its energy consumption and/or its related emissions:

- Monitoring systems/Audits:
- Building/ facilities optimisation:
- Fleet optimisation:
- Alternative energy sources (renewable energy, biofuel, ...):
- Others:

- *Monitoring systems/Audits: The company monitors its energy consumption and related emissions.*
- *Building/ facilities optimisation: SNCF Réseau converted its catenary system. This electrification system is reported to be up to 3 times more efficient in terms of energy consumption. Energy saving programmes on lighting and air-conditioning functions throughout the sites of operation have also been launched. Moreover a portal which manages energy consumption of building in real time have been placed.*
- *Fleet optimisation: SNCF Réseau launched a programme on eco-driving of work engines and awareness raising for drivers aiming at reducing 5% to 10% in energy consumption on the mid-term. In addition, the company has implemented a "Start and Stop" system for thermal locomotives to rationalise the use of fuel on them. SNCF Réseau has also a programme over the period from 2014 to 2025 to progressively replace its vehicles with thermal engines with engines with lower environmental impact including electric vehicles. The company also optimised its car fleet.*
- *Alternative energy sources: SNCF Réseau partnered with Eolfi to create a company Airefsol Energies. The goal is to conceive and develop the supply of green electricity. In this regard, SNCF Réseau makes available unused lands to be transformed in photovoltaic installations.*
- *Others: The company works towards the rationalisation of transportation of employees. In this regard, the company encourages the use of eco-friendly modes of transport such as bikes, and increase the use of video/audio-conference. Moreover, it develops storage systems for traction electricity produced by the braking of trains for reuse on the network.*

**Coverage**

The company has taken such measures throughout the company.

**Energy consumption**

*The company's energy consumption, normalised to sales, has decreased continuously over the past three years by 5% from 0.2389 (GWh / M Euros) in 2016 to 0.2265 (GWh / M Euros) in 2018. Following the reorganisation of 2015, the energy consumption, normalised to sales cannot be assessed for the previous years.*

**CO2 emissions linked to energy consumption (direct AND indirect\*, when applicable)**

*The company's CO2 emissions (direct and indirect) linked to energy consumption, normalised to sales/production, have decreased but not continuously over the past three years, from 0.0273 (Kt/ M Eur) in 2016 0.0265 (Kt/ M Eur) in 2018. Following the reorganisation of 2015, the CO2 emissions (direct and indirect) linked to energy consumption, normalised to sales cannot be assessed for the previous years.*

**SO2 emissions linked to energy consumption**

The company does not disclose quantitative data on SO2 emissions (direct and indirect) linked to energy consumption.

**NOx emissions linked to energy consumption**

The company does not disclose quantitative data on NOx emissions (direct and indirect) linked to energy consumption.

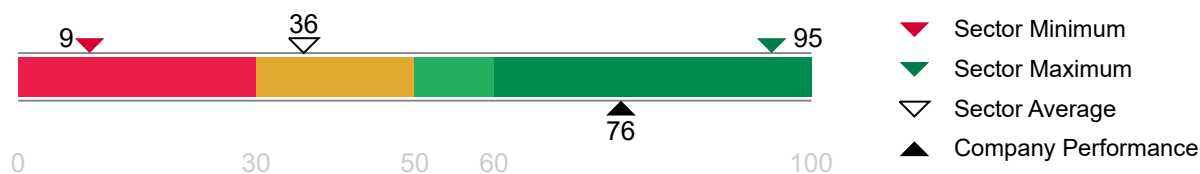
<b>Leadership</b>	<b>65</b>
Relevance	65

<b>Implementation</b>	<b>100</b>
Means & resources	100
Coverage	100

<b>Results</b>	<b>38</b>
Trends	38

**ENV2.6 Management of local pollution**

(score: 76, weight: 2)



**Relevance of the company's commitment to reducing its local pollution**

The company's commitment relative to controlling its local pollution focuses on all relevant nuisance sources of local pollution for the sector:

- Noise
- Landscape aesthetics
- Vibrations

In addition the company states in its answers that it wishes to resolve 5000 noise issues in the period 2015-2020.

The company engages with external bodies and has developed comprehensive measures to preventing local pollution:

- Monitoring of nuisance parameters
- Low nuisance equipment
- Programmes to reduce local pollution
- Dialogue with relevant stakeholders

**Means allocated**

- *Monitoring of nuisance parameters: New projects and new buildings near an existing railway track have to comply with stringent noise protection standards and the railway infrastructure has to include noise abatement systems compliant with the regulations. To add, the company reports to assess noise risks of its projects to include remediation measures. SNCF Réseau also takes part in a scheme at the national level to identify the most critical situations for noise and see what operational measures could be introduced. The company also installs noise measurement stations on buildings located at stop areas.*

- *Low nuisance equipment: The company engages in innovation programmes and research at both the national and European level on on-rail absorbers, metallic bridges treatment, sorting noise reduction, experiments on anti-noise walls or measures to mitigate vibrations effects. In addition, SNCF Réseau tends to use vehicles and engines which respect the noise limitations. The company also equips the discharge chutes with polyurethane absorbent mats, which significantly reduces the noise level.*

- *Programmes to reduce local pollution: SNCF, is an associate member of the Shift2rail joint venture. This European-funded programme aims to promote innovation in the rail system. Prototypes of track and rolling stock are being developed in the various innovation programmes until 2021. SNCF intervenes in a transversal program which aims in particular to ensure that the developed subsystems are less noisy, and quantify the impact of this reduction on noise scenarios in environments representative of the company's territory.*

- *Dialogue with relevant stakeholders: A regional committee for railway noise has been put in place to promote exchanges and decision making with relevant stakeholders. To add, a technical committee is also in place and gathers, local authorities, SNCF Réseau and SNCF, which monitors the implementation of the measures taken. In addition, SNCF Réseau appears to have a system to inform communities on the nature of works, their duration and potential noise nuisances as well as measures in place to mitigate them. SNCF Réseau also sign agreements with local authorities affected by local pollution due to its activities in order to establish a clear dialogue with them.*

**Coverage**

The company has taken such measures throughout the company.

**Complaints from residents about local pollution**

The company does not disclose quantitative figures about complaints from residents.

**Stakeholders' feedback**

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

*As of 09/2019, SNCF Réseau did not appear to be involved in any controversy related to this sustainability driver.*

<b>Leadership</b>	<b>100</b>
Relevance	100

<b>Implementation</b>	<b>100</b>
Means & resources	100
Coverage	100

<b>Results</b>	<b>28</b>
Performance	28

Human resources

Score: 74

HRS1.1 Promotion of labour relations

(score: 90, weight: 2)



Visibility of commitment

The company has issued a formalised commitment to promote labour relations in its:

*"Statut des relations collectives entre SNCF, SNCF Réseau, SNCF Mobilité constituant le Groupe Public Ferroviaires et leurs personnels".*

Relevance of commitment

The company commits to promoting collective bargaining.

Ownership of commitment

Employee representatives sit on the Board.

*The Board of Directors of SNCF Réseau comprises of 24 members including 8 members who are elected by the company's employees.*

Coverage of employee representative bodies

*Local employee representative bodies have been set up in the majority of company sites. Moreover there is a company-wide representative body with which the company negotiates. The SNCF's EWC, in which all SNCF Réseau employees are represented, is composed of 27 employee representatives representing all countries of operation: 2 German, 2 Belgian, 2 Danish, 1 Spanish, 10 French, 1 Magyar, 2 Italian, 2 Dutch, 1 Romanian and 2 Swedish.*

Subjects covered by collective bargaining

Collective bargaining between the company and employee representatives deals with subjects related to the quality of the work environment, including:

- health & safety
- CSR issues
- remuneration
- working hours
- training
- career development
- work time flexibility
- employability/life long learning
- stress management
- equal opportunities

Stakeholders' feedback

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

*As of 09/2019, SNCF Réseau did not appear to be involved in any controversy*

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*related to this sustainability driver.*

**Coverage of collective agreements on working conditions**

*Collective agreements on working conditions cover 100% of the company's employees.*

<b>Leadership</b>	<b>83</b>
Visibility	65
Relevance	100
Ownership	65

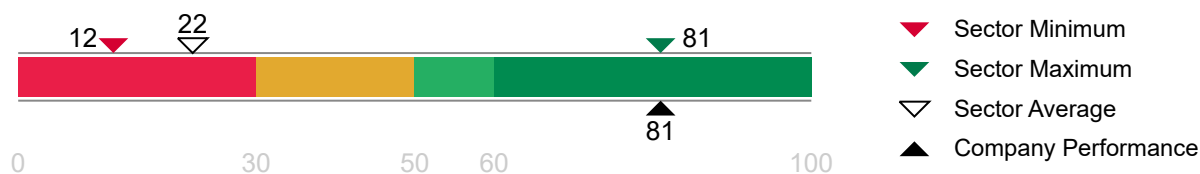
<b>Implementation</b>	<b>100</b>
Scope	100
Coverage	100

<b>Results</b>	<b>88</b>
Performance	88

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### HRS2.3 Responsible management of reorganizations

(score: 81, weight: 3)



**Relevance of commitment to manage reorganisations responsibly**

The company commits to minimising the number of lay-offs and redundancies by anticipating and planning reorganisations.

**Involvement with employee representatives**

The company has signed a framework agreement with employee representatives on reorganisations.

*SNCF Réseau is in an agreement with three unions, CFDT, UNSA RFF and CFE-CGC, aimed at guiding the restructuring resulting from the railway reform adopted in France. The agreement includes the company's commitments towards the employment of the workforce, securing employees' career paths and skills development, and consulting employee representatives during the transition period due to the restructuring.*

*In its response to Vigeo Eiris, SNCF declared that in case of reorganisation, SNCF consults the Health and Safety and Working conditions Committee, as well as the company's committees, this process concerns SNCF Réseau as well.*

**Means allocated to prevent and manage reorganisations**

The company has allocated extensive measures to limit the impacts of reorganisations:

- significant financial compensation
- early retirement
- reduction of labour time
- internal mobility programme
- outplacement services
- individualised follow-up of employees
- re-training

*- Significant financial compensation: The company provides financial supports to its employees that have been laid offs or displaced.*

*- Internal mobility programme: SNCF entities, including SNCF Réseau, have signed a "Mobility Charter" easing the transfer of employees between them and rendering the reorganisation of the railway sector smoother in terms of social impact and transferability of knowledge.*

*- Individualised follow-up of employees: The company provides counselings to its employees affected by the layoffs through a structure: "Espaces Initiative Mobilités". The structure is in charge of providing individual back-up to each employee concerned by voluntary or mandatory professional transition.*

*- Re-training Programmes to retrain employees on positions to be occupied at other SNCF Group entities are available at the Group level in order to reconvert employees in this regard.*

**Coverage**

These means are allocated for all the company's employees affected by the reorganisations.

**Stakeholders' feedback**

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

*As of 09/2019, SNCF Réseau did not appear to be involved in any controversy related to this sustainability driver.*

**Result of the company's commitment to manage reorganisations responsibly**

The company has been able to avoid redundancies or to maintain employment.

*SNCF Réseau has been constantly hiring in the last three years and states that it is making a lot of efforts to recruit new employees in order to face the challenges of the new reorganisation (Nouvel'R). The slight decrease in the total number of employees is due to retirement.*

<b>Leadership</b>	<b>79</b>
Relevance	65
Ownership	100

<b>Implementation</b>	<b>83</b>
Means & resources	100
Coverage	65

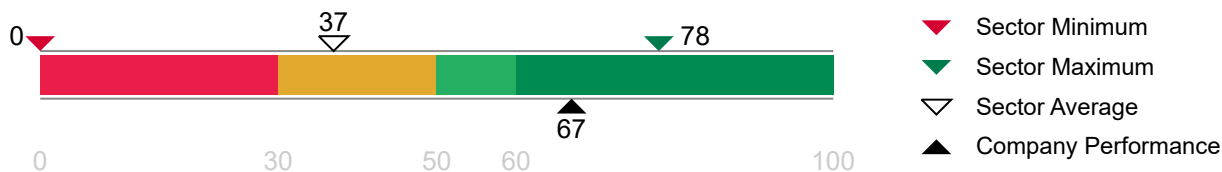
<b>Results</b>	<b>81</b>
Performance	81

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**HRS2.4 Career management and promotion of employability**

(score: 67, weight: 2)



**Visibility of commitment**

The company has issued a largely publicised, formal commitment to promote career management and training which is publicly available in its:

*Panorama Social.*

**Relevance of commitment**

The company's commitment to promoting career management and training addresses all of its responsibilities:

- Ensure training, life-long learning and employability
- Promote career development
- Anticipate long-term employment needs and skill requirements (ageing workforce)
- Put in place a concerted career management framework, which is transparent and individualized.

**Ownership of commitment**

The Head of HR is part of the company's Board or Executive Committee. However line managers do not appear to be evaluated on their performance in terms of HR management.

**Career management systems**

The company has set up an internal job opportunity marketplace and/or has formalised the skill requirements for the various job positions. Moreover employees have regular performance assessment and career counselling interviews.

*SNCF Reseau have an internal program called VISO which allows employees to have access to an internal job opportunity marketplace where the skill requirements are formalised for each job position. Each year employees have annual performance interviews with they managers. Moreover, apart from annual performance interviews, employees may ask for career counseling from either mobility counsellors, trainer counsellors or external expert on career development.*

**Coverage of career management systems**

These career management systems cover all of the company's employees.

**Types of training provided to non-managers**

The training programmes are aimed at adapting employees' skills to the requirements of their current position and also enable them to develop additional skills. These include programmes leading to certifications and/or degrees.

*SNCF Reseau has a skills development plan for each of its employees in which it plans, forecasts and strategic projects, the skills and means necessary to maintain or develop them. Indeed the company offers training aimed at keeping the required skills to keep with the latest changes in their profession. The company also offers the possibility for its employees to start a training program which lead to*

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certifications and degrees, for those who wish to change position or evolve.

**Means allocated to training for all employees**

The company's performance indicators related to training per employee have remained stable over the past three years to stand at 44.38h per employee.

**Mobility / turnover**

The company does not disclose quantitative data on performance indicators such as employee turnover or mobility rates.

**Training delivered during the year under review**

The majority of the company's employees and subcontractors received training during the year under review.

The company states that at least 75% of its employees received training every year.

<b>Leadership</b>	79	<b>Implementation</b>	83	<b>Results</b>	39
Visibility	100	Means & resources	65	Performance	39
Relevance	100	Scope	100		
Ownership	30	Coverage	100		

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**HRS3.1 Quality of remuneration systems**

(score: 85, weight: 2)



**Visibility of commitment**

The company has issued a largely publicised, formalised commitment to the quality of its remuneration systems in its:

*Collective agreement.*

**Relevance of commitment**

The company's commitment addresses its responsibilities:

- Guarantee decent remuneration
- Promote access to social security
- Ensure transparency and communication when setting and reviewing remuneration
- Take into account individual achievements in setting and reviewing remuneration

**Ownership of commitment**

The commitment applies throughout the company and is supported by senior management. In addition, other employees are directly involved.

*The Performance and Compensation Department within the Human Resources Department of SNCF Réseau is directly involved in the compensation policy.*

**Means to ensure transparency of remuneration**

The principles and framework for setting variable remuneration are disclosed to its employees and verifiable by employees representatives.

*Starting from January 2015, SNCF Réseau concluded an incentive agreement, with unions, covering all employees at the company.*

**Coverage of transparent and verifiable remuneration systems**

The measures implemented cover all of the company's employees.

**Trend of quality of remuneration systems**

The quality of the company's remuneration systems has improved.

*All of SNCF Réseau employees have annual performance assessment interviews linked to their remuneration. Moreover all employees are benefiting for a profit-sharing plan.*

**Stakeholders' feedback**

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

*As of 09/2019, SNCF Réseau did not appear to be involved in any controversy related to this sustainability driver.*

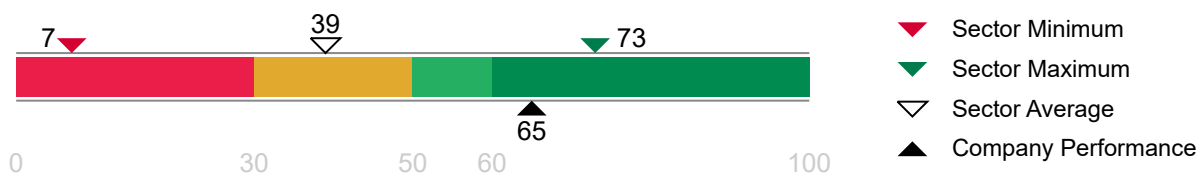
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Leadership	90	Implementation	100	Results	65
Visibility	100	Means & resources	100	Performance	65
Relevance	100	Coverage	100	Trends	65
Ownership	65				

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## HRS3.2 Improvement of health and safety conditions

(score: 65, weight: 3)



The company has made a formalised commitment to health and safety issues, and has set up quantitative targets in this regard which cover both its employees and sub-contracted workforce.

### Visibility of health & safety commitments

*Ethical Charter.*  
 Decrease by 50% the annual frequency rate of accidents at work between by 2020, with 2015 as base year.  
 No fatal accident of SNCF Network agent or service provider working on its yards.

### Relevance of commitment

The company's commitment addresses all of its responsibilities:

- ensure awareness about health and safety issues
- reduce the number of work accidents and their severity (road safety)
- prevent occupational disease
- reduce stress/promote well-being

### Ownership of commitment

*In addition, the security department and the network security department are directly involved in the oversight and the implementation of the company's actions on health and safety. The Social and Economic Committee composed of employee representatives are also involved at group level.*

### Means allocated to health and safety

The company has allocated means to address these issues, including a certified health and safety system and employee incentives

- training/awareness raising programmes
- internal monitoring
- risk assessments
- internal H&S audits
- H&S competitions
- remuneration based on H&S performance
- ISO 45001 / OHSAS 18001 certifications

- *Training/awareness raising programmes: The company provides various training of the subject of health and safety to its employees.*
- *Internal monitoring: SNCF Réseau monitors health and safety indicators such as accident frequency and severity rates.*
- *Risk assessments: SNCF Réseau has made a risk mapping of health and safety hazards, which is updated annually.*
- *Internal H&S audits: Internal audits are conducted to verify safety processes.*
- *Remuneration based on H&S performance :Line managers and senior management officers have health and safety criteria in their performance based remuneration.*
- *OHSAS 18001 certifications: All of the company's industrial sites are certified OHSAS 18001.*

**Coverage of health and safety system**

The health and safety measures cover all of the company's employees and suppliers/ contractors.

**Means allocated to reduce stress at work**

The company has allocated basic means to address stress at work, including:

- monitoring of absenteeism/rate of occupational disease
- job redesign (work organisation)
- assessment of stress through analysis of internal H&S data
- monitoring of stress through opinion surveys
- awareness raising for employees
- identification of stress sources
- stress support instruments (hotline, counselling service, employee assistance programme, etc)
- training on stress for employees
- training on stress for managers
- measures to improve ergonomics/ ergonomic design of workplaces

- *Monitoring of absenteeism/rate of occupational disease: SNCF Réseau conducts a follow up on absenteeism*  
 - *Assessment of stress through analysis of internal H&S data: The company analyses and rates the quality of life at work, employee satisfaction on working conditions and worklife balance.*  
 - *Monitoring of stress through opinion surveys: SNCF Réseau has conducted an internal barometer to give the employees the opportunity to express themselves and to measure the internal climate of the company.*  
 - *Identification of stress source: Each operating entity of SNCF Réseau assesses the psychosocial risks using a grid of 25 questions proposed to groups of employees potentially exposed to the same risks from their business line. Of note, the company states that it has awareness raising, training on stress for employees and managers, measures to improve ergonomics/ ergonomic design of workplaces. However no further details are provided.*

**Coverage of means allocated to address mental health**

The measures allocated to address mental health cover all of the company's employees.

**Accident frequency rate of the company's employees**

*The company's lost-time injury frequency rate (LTIFR) (/200,000 hwkd ) has decreased over the past three years by 9% from 2.24 (LTIFR) (/200,000 hwkd ) in 2016 to 2.04 (LTIFR) (/200,000 hwkd ) in 2018.*

**Accident severity rate of the company's employees**

*The company's accident severity rate has increased over the past three years by 20%, from 0.42 in 2016, to 0.50 in 2018.*

**Other health and safety indicators of the company's employees**

*The company's rate of absenteeism has increased over the past three years, from 3.81% in 2016 to 4.25% in 2018.*

**Accident frequency rate of the company's subcontractors**

Information disclosed on the company's accident frequency rate of subcontractors is insufficient.

**Accident severity rate of subcontracted labour**

The company does not disclose quantitative data on accident severity rates of subcontractors .

**Stakeholders' feedback**

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

*As of 09/2019, SNCF Réseau did not appear to be involved in any controversy related to this sustainability driver.*

<b>Leadership</b>	<b>100</b>
Visibility	100
Relevance	100
Ownership	100

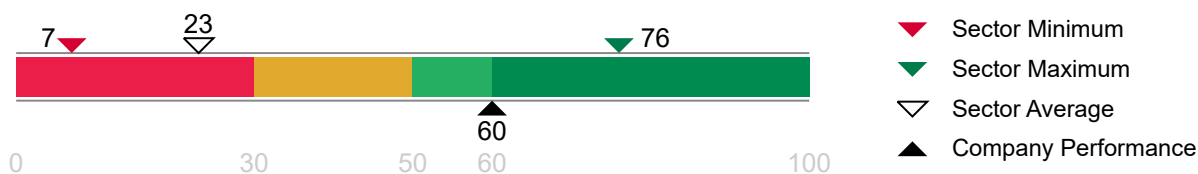
<b>Implementation</b>	<b>79</b>
Means & resources	65
Coverage	100

<b>Results</b>	<b>17</b>
Performance	24
Trends	10

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**HRS3.3 Respect and management of working hours**

(score: 60, weight: 2)



**Visibility of commitment**

The company has issued a largely publicised, formalised commitment to the respect and management of working hours in its:

*agreement on social union of the railway sector with social partners on the extension of SNCF working conditions benefiting SNCF Réseau employees.*

**Relevance of commitment**

The company's commitment addresses all of its responsibilities:

- Respect the rights of employees to vacation and leisure time
- Provide compensation measures for those employees working atypical hours or overtime
- Take into account the desires of employees in establishing working hours (flexibility, part-time)

**Ownership of commitment**

The commitment applies throughout the company and is supported by senior management. In addition, other employees are directly involved.

*The Human Resources Department of SNCF Réseau is responsible for the oversight of the policy.*

**Means to compensate for atypical working hours**

The company has set up measures to compensate for atypical working hours.

*The agreement on the reorganisation and the reduction of working time introduced a 'compensatory rest' for non usual trips from work to home in addition to a work organisation of scheduling meetings and additional leaves for family events. SNCF Réseau has put in place specific procedures to ensure that the number of mandatory rest days of the year is respected and to limit the number of hours worked per days and nights as well as due compensation for work at night. In addition, SNCF Réseau has set up the 'time savings account' which allows employees to save days off a personal account in order to benefit from them later. Also, employees have the possibility to set up individualised schedules and choosing their working hours.*

**Coverage of measures to compensate for atypical working hours**

The measures to compensate for atypical working hours measures cover all of the employees affected.

**Means to promote work/life balance**

The company has taken some measures to take into account employee preferences in setting working hours, such as

- voluntary flex-time schemes
- employee satisfaction survey on working hours



- long-term visibility on working schedules
- respect of leisure time (at least two consecutive days off a week)
- system to allow employees to switch from part-time to full-time work
- monitoring of atypical working hours (badge system or declarative system)

- *Voluntary flex-time schemes* : Through the Collective agreement on part time working hours of the staff in a permanent scheme, SNCF Réseau sets the conditions to benefit from voluntary part time working hours.  
 - *Employee satisfaction survey on working hour*: Surveys are sent to employees to monitor satisfaction of working hours.  
 Of note, in its answers to Vigeo Eiris, the company report on having long-term visibility on working schedules, respect of leisure time (at least two consecutive days off a week), system to allow employees to switch from part-time to full-time work and monitoring of atypical working hours (badge system or declarative system). However no further details are provided.

**Monitoring of atypical working hours**

Information obtained from the company and public sources regarding monitoring system of atypical working hours is insufficient.

**Stakeholders' feedback**

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

*As of 09/2019, SNCF Réseau did not appear to be involved in any controversy related to this sustainability driver.*

<b>Leadership</b>	<b>90</b>
Visibility	100
Relevance	100
Ownership	65

<b>Implementation</b>	<b>69</b>
Means & resources	55
Coverage	100

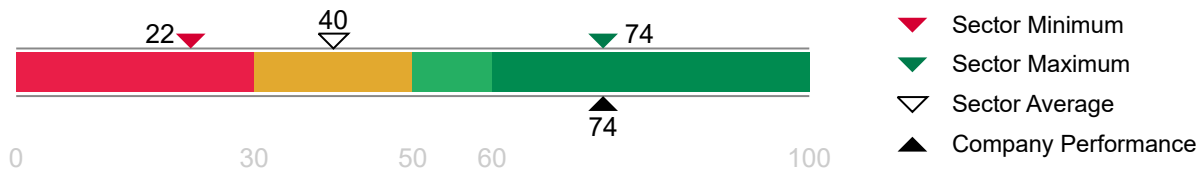
<b>Results</b>	<b>22</b>
Performance	22

Human rights

Score: 68

HRT1.1 Respect for human rights standards and prevention of violations

(score: 74, weight: 2)



Visibility of commitment

The company has issued a formalised commitment to respect and promote human rights in society in its Ethical Charter. In addition, the company is a signatory of the Global Compact and communicates on this principle.

Relevance of commitment

The company's commitment to respect and promote human rights in society addresses all of its responsibilities:

- Prevent cruel, inhuman, or degrading treatment
- Prevent complicity in human rights violations
- Respect the right to personal security

Ownership of commitment

The commitment applies throughout the company and is supported by senior management. In addition, other employees are directly involved.

The Ethics department is in charge of the company's policy implementation in this regard.

Means allocated

The company has set up a permanent system to ensure the respect and promotion of human rights in society that includes:

- awareness-raising programmes for employees
- training programmes for employees
- grievance mechanisms
- human rights impact assessments
- internal audits
- consult local independent and representative stakeholders
- human rights capacity building for local communities
- external audits/verification
- external investigation of allegations

- Awareness-raising programmes for employees: The Ethics department organises awareness raising presentations in the morning, including the theme of human rights. Also the Ethical charter is distributed internally and signed annually.  
 - Grievance mechanisms: A network of Ethics correspondents is present within SNCF Réseau and enables alerts to be reported within the company. The development of an ethic application contributes to raising alerts about non-compliance with ethical principles within the company.  
 - External audits/verification: The company has a self-assessment and/or peer review within the UN Global Compact "advanced" club.

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**Coverage**

The company has set up such systems throughout the company.

**Stakeholders' feedback**

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

*As of 09/2019, SNCF Réseau did not appear to be involved in any controversy related to this sustainability driver.*

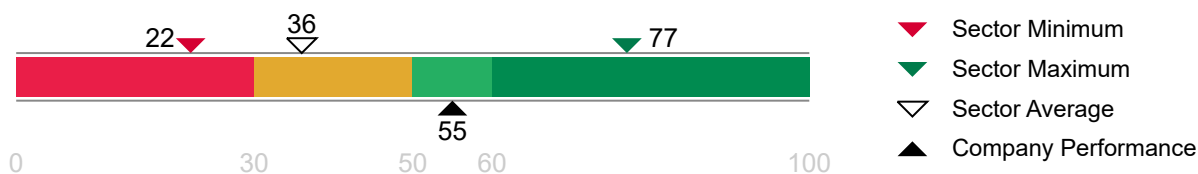
<b>Leadership</b>	<b>79</b>
Visibility	65
Relevance	100
Ownership	65

<b>Implementation</b>	<b>79</b>
Means & resources	65
Coverage	100

<b>Results</b>	<b>65</b>
Performance	65

**HRT2.1 Respect for freedom of association and the right to collective bargaining**

(score: 55, weight: 3)



**Visibility of commitment**

The company has issued a formalised commitment to freedom of association and the right to collective bargaining in its "Statut des relations collectives entre SNCF, SNCF Réseau, SNCF Mobilité constituant le Groupe Public Ferroviaires et leurs personnels". In addition, the company is a signatory of the Global Compact and communicates on this principle.

**Relevance of commitment**

The company's commitment is detailed and addresses all of its responsibilities:

- Respect and protection of freedom of association and the right to organize (ILO C87)
- Respect of the right to collective bargaining (ILO C98)
- Respect and protection of workers' representative (ILO C135)
- Prevent workers' representative discrimination
- Guarantee the effective exercise of the trade union rights in the workplace

**Ownership of commitment**

The commitment applies throughout the company and is supported by senior management. In addition, the human resource department is in charge of applying these commitments.

**Monitoring**

It is not clear what steps the company takes to ensure that freedom of association is respected throughout the company's operations (e.g.: through external verification, risk mapping, audits, etc.)

- occasional risk mapping
- occasional internal audits
- on-going monitoring of labour rights risks
- regular internal audits
- external audits/verification
- external investigation of allegations
- cooperation with unions: joint audits, joint grievance procedures etc.

Of note, the company reports to have occasional risk mapping and occasional internal audits, but no further details are provided.

**Promotion of collective bargaining**

The company has provided resources to ensure that employees receive information on trade union rights (e.g.: dedicated intranet) and are able to exercise these (e.g.: infrastructure, time).

Besides distributing a booklet to new hired which presents the different employees' representative instances and details their role, SNCF communicates through intranet and internal newsletters about the election of employees' representative

and employees have access to trade unions site via the company's intranet. SNCF conducts training about the functioning of employees' representatives instances to employees working in the HR Department.  
 In addition, an application on smartphone has been provided to SNCF Réseau employees in order to keep informed on the on-going negotiations processes.

**Coverage**

Information obtained from the company and public sources the percentage of the company where such labour rights systems and programmes are in place is insufficient.

**Stakeholders' feedback**

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

As of 09/2019, SNCF Réseau did not appear to be involved in any controversy related to this sustainability driver.

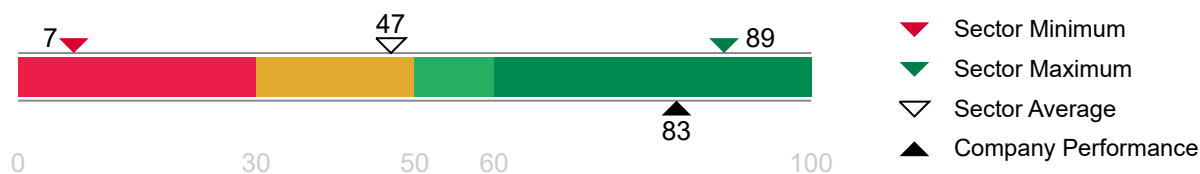
<b>Leadership</b>	<b>79</b>
Visibility	65
Relevance	100
Ownership	65

<b>Implementation</b>	<b>20</b>
Means & resources	28
Coverage	0

<b>Results</b>	<b>65</b>
Performance	65

**HRT2.4 Non-discrimination**

(score: 83, weight: 2)



**Visibility of commitment**

The company has issued a formalised commitment to non-discrimination in its diversity and inclusion policy. In addition, the company is a signatory of the Global Compact and communicates on this principle.

The company has set the following targets:

- Reduce the number of employees over 50 years of age who have not received training for over three years
- Strengthen the recruitment of people with disabilities and meet the 6% employment obligation
- Increase by 10% the rate of women in the company

**Relevance of commitment**

The company's commitment to non-discrimination explicitly defines most of the categories and the management processes to which these apply:

- gender
- sensitive medical conditions
- trade union membership or activities
- Discrimination in employment decisions (hiring / promoting / redundancies)
- Discrimination in working conditions (working hours / training / remuneration / social security)
- race / ethnicity / nationality
- social background
- religion
- sexual orientation
- family responsibilities (including pregnancy)
- disabilities
- political opinion
- age

**Ownership of commitment**

The commitment applies throughout the company and is supported by senior management. In addition, according to the company's answer, the policy of diversity and non-discrimination is guided by the Cohesion and Human Resources Department of the GPF (Groupe Public Ferroviaire).

At SNCF Réseau this mission is relayed by the Human Resources Department. The Disability & Employment Mission, the Employment Policy Department and the Social Relations Department, within the Human Resources Department of SNCF Réseau, ensuring that the Company's commitments are guaranteed, and that all entities are involved made aware. Moreover the company has signed a convention with the High Gender Equality Council.

**Means allocated**

The company has set up significant measures to prevent discrimination and promote diversity:

- awareness raising
- maternity pay (greater than the statutory requirement)

- paternity pay (greater than the statutory requirement)
- job sharing initiatives
- monitoring of salary disparities
- training
- monitoring
- confidential reporting system / grievance procedures
- disciplinary procedures / corrective measures
- affirmative action programmes
- flexitime initiatives
- child care facilities/child care subsidies
- career break opportunities

- Awareness raising: the company raises awareness of employees on disabilities and organises the week for employment of people with disabilities in which videos are shown on everyday life of these employees within the company. SNCF, including in the SNCF Réseau perimeter, conducts awareness raising sessions for its personnel in charge of the recruitment as part of steps to insert people located in remote and marginalised areas, to attract talents with a disadvantageous social background. The "Egalité & Compétences" sessions took place before recruitment in Bobigny, Bondy, La Courneuve and Roissy. Interactive videos are also available for employees on topics such as gender diversity, as well as guides towards this principle.

- Training: SNCF, including in the SNCF Réseau perimeter, trains mentors to be capable of accompanying youth originary from difficult social background in their professional project.

- Monitoring: SNCF Réseau monitors the salary gap between men and women and provides a detailed explanation to any request with this aspect. SNCF Réseau also monitors indicators including the share of women hired in senior management positions and the share of women who benefited from training.

- Confidential reporting system / grievance procedures: SNCF has put a confidential reporting system via two emails to raise any issues with the Code of ethics including non-discrimination.

- Disciplinary procedures / corrective measures: In case of discrimination, a request of written explanations is sent to the employee who had such behaviour and appropriate disciplinary measures are undertaken in line with the HR procedures.

- Affirmative action programmes: For each available position, SNCF Réseau HR Department strives to submit at least one female application. The company has put in place a "Senior Plan", in line with regulations (Social Security Fund Act). SNCF Réseau also offers accommodation of the workplace to employees with disabilities and works to maintain the job of employees when they become disable or in case the handicap situation worsens. To add, the company added clauses to its agreement on disabilities, which includes adjustments of working hours and telecommuting. Finally, the company signed a partnership with, GESAT, an organisation which promotes the insertion of people with disabilities in the workforce.

Of note, the company reports to have: Flexitime initiatives, child care facilities, career break opportunities, maternity pay (greater than the statutory requirement), paternity pay (greater than the statutory requirement), job sharing initiatives, and monitoring of salary disparities, but no further details are provided.

**Coverage**

The company has set up programmes to promote diversity (eg: training, awareness-raising, etc.) throughout the company.

**Results in terms of women in management positions**

The share of women in management positions has increased continuously over the past three years by 1.2 percentage point, from 19% in 2016 to 20.2% in 2018.

**Results in terms of employment of persons with disabilities**

The share of employees with disabilities in the total workforce has increased but not continuously over the past five years, from 3.4% in 2014 to 3.79% in 2018.

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**Stakeholders' feedback**

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

*As of 09/2019, SNCF Réseau did not appear to be involved in any controversy related to this sustainability driver.*

<b>Leadership</b>	<b>100</b>
Visibility	100
Relevance	100
Ownership	100

<b>Implementation</b>	<b>83</b>
Means & resources	65
Coverage	100

<b>Results</b>	<b>65</b>
Performance	65
Trends	65

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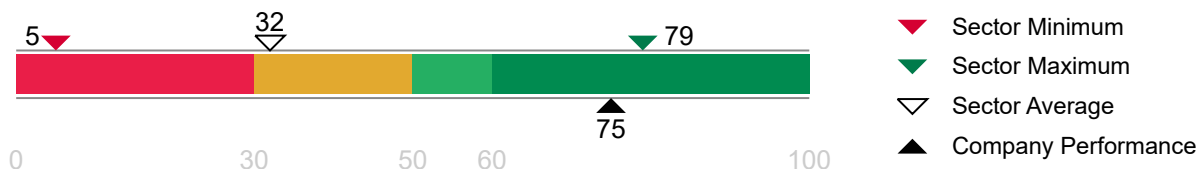


Community involvement

Score: 66

CIN1.1 Promotion of the social and economic development

(score: 75, weight: 2)



Visibility of the policy

The company has issued a formalized and accessible commitment to promote local social and economic development in its:

*Ethical Charter.*

Relevance of commitment

The company's commitment to promote local social and economic development addresses its main responsibilities:

- Optimise the impact of operations on the local community
- Promote the creation and development of local businesses
- Promote the employment and training of local personnel
- Reduce the social impacts related to site closures, openings, and restructuring
- Implementing a responsible tax strategy

Ownership of commitment

The commitment applies throughout the company and is supported by senior management. In addition, other stakeholders are involved.

*The Communication and Territorial Dialogue Division and more specifically the Concertation, External and Societal Relations Division, As well as the Sustainable Development Department, manages the societal actions of SNCF Réseau in connection with the sustainable development department of the public railway group and the SNCF Foundation. Moreover, SNCF Réseau, in the continuity of its policy of concertation and dialogue with its stakeholders, SNCF Réseau has installed, since June 2018 a national committee of stakeholders has been put in place in order to promote social and economic development.*

Relevance of the company's commitment to the promotion of transport infrastructures

The company's commitment addresses its main responsibilities towards the promotion of transport infrastructures.

- Collaborative projects
- Transfer of technology
- Support of sustainable mode of transportation

Means allocated to address social and economic development

The company has allocated extensive means to address social and economic development, including:

- Actions to improve social integration
- Actions to promote the creation and development of local businesses
- Actions to promote the employment and training of local personnel
- Stakeholders dialogue procedure

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- *Actions to improve social integration: Social clauses are sought in works contracts to develop equal opportunities through assisted employment in sensitive areas.*  
 - *Actions to promote the creation and development of local businesses: SNCF Réseau has a local procurement policy, particularly with regard to SMEs.*  
 - *Actions to promote the creation and development of local businesses: SNCF Réseau encourages small and local suppliers in the activities related to communication, business support services and catering.*  
 - *Stakeholders dialogue procedure: The company has a stakeholders dialogue procedure aimed at conducting consultation with the end users and listening to their needs and has put in place a training programme about this procedure.*

**Geographical coverage**

These means are allocated throughout the company.

**Performance trend**

The company monitors indicators on social and economic development, and these have been improving over time.

*The company's amount of socially responsible purchases increased in the past three years, by 95.6%, from EUR 6.9m in 2016 to EUR 13.5m in 2018.*

**Means allocated to address the promotion of transport infrastructures**

The company has allocated some means to address the promotion of transport infrastructures, including:

- Social impact assessments studies
- Actions for the transfer of technology
- Support of sustainable mode of transportation
- Development partnerships with relevant stakeholders

- *Development partnerships with relevant stakeholders: SNCF Réseau is a member of the National Biodiversity Committee representing the transport linear infrastructure managers sector.*

- *Support of sustainable mode of transportation: The company encourages sustainable mode of transportation, such as carpooling for distances less than 25km. The company also wishes to be a major actor in the green bond market to invest in sustainable modes of transportations.*

**Geographical coverage**

There is no evidence that these measures are allocated throughout the company where the company is present or has commercial interests.

**Transparency of tax reporting**

The Company reports significantly on taxes paid. Reporting covers:

- taxes paid in some countries of operations
- taxes paid in some regions of operations
- taxes paid in key regions of operations
- taxes paid in key countries of operations
- sales per zone
- operating profit per zone
- number of employees per zone
- ratio between tax paid and headline corporate tax rate per zone
- explanation for significant differences between tax rate actually paid and expected tax rate

*The Company reports significantly on taxes paid. Reporting covers:*

- *Taxes paid in key countries of operations: The company reports on taxes paid in France (which represents its sole country of activity).*

**Presence in IMF 'offshore financial centers' and/ or in jurisdictions considered by the OECD as not compliant enough with tax transparency rules** *The Company does not operate in any location considered by the IMF as 'offshore financial centres' or in jurisdictions considered by the OECD as not compliant enough on tax transparency rules.*

**Stakeholders' feedback**

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

*As of 09/2019, SNCF Réseau did not appear to be involved in any controversy related to this sustainability driver.*

<b>Leadership</b>	<b>76</b>
Visibility	65
Relevance	65
Ownership	100

<b>Implementation</b>	<b>65</b>
Means & resources	65
Coverage	65

<b>Results</b>	<b>85</b>
Performance	76
Trends	100

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**CIN2.1**      **Promotion of access to postal services**  
(deactivated)

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Services' accessibility is not of a major concern for Railways Operators, this sustainability driver is, therefore, deactivated for SNCF Réseau.

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**CIN2.2 Contribution to general interest causes**

(score: 48, weight: 1)



**Relevance of commitment**

The company's commitment to supporting general interest causes addresses some of the relevant issues for the sector:

- Education
- Health
- Sustainability
- Culture

**Visibility of commitment**

*The company has defined a clear policy / strategy to manage its contribution to general interest causes in its "Livret fondation SNCF".*

**Ownership of commitment**

The commitment applies throughout the company, supported by senior management. In addition, other employees are directly involved.

*The SNCF Foundation is chaired by Patrick Jeantet, President of SNCF Réseau. Stéphane Volant, Secretary General of SNCF is the Vice-president and Marianne Eshet, the General Delegate.*

**Means allocated**

The company has allocated significant means to general interest causes, including:

- Financial support / Fund raising
- In-kind donations (including service delivery)
- Pro bono work
- Complementing or matching employees' charitable contributions
- Sponsoring employee volunteering

*- Financial support / Fund raising: SNCF Foundation has a EUR 5m budget, SNCF Réseau participates up to EUR 500,000.*

*- Pro bono work: SNCF Réseau set up a system allowing each employee, on his working time, to bring his skills to an association, from 1 to 10 days a year.*

*- Sponsoring employee volunteering: Through the Coups de Coeur solidaires programme, the SNCF Foundation has been financially supporting the associations where SNCF employees are volunteering (their free time) for 20 years.*

**Geographical coverage**

These means are allocated throughout the company.

**Scope of the means allocated**

The resources allocated by the company contribution to general interest causes programmes address the main issues:

- Education

- Health
- Sustainability
- Culture
- Social

**Performance benchmark for contributions to general interest causes**

Information obtained from the company and public sources regarding the company's contributions to support general interest causes is insufficient.

*In 2016, 2017 and 2018 EUR 500,000 were given by SNCF Réseau to the SNCF Foundation. However since the EBIT of SNCF Réseau was negative in 2018, it is not possible to perform a benchmark relative to its peers.*

**Trend in contributions to general interest causes**

The company monitors indicators on contributions to general interest causes, and these have been stable over time.

*In 2018, EUR 500,000 were given by SNCF Réseau to the SNCF Foundation. A similar amount was given to the foundation in 2016 and 2017.*

<b>Leadership</b>	<b>48</b>
Visibility	65
Relevance	30
Ownership	65

<b>Implementation</b>	<b>76</b>
Means & resources	65
Scope	65
Coverage	100

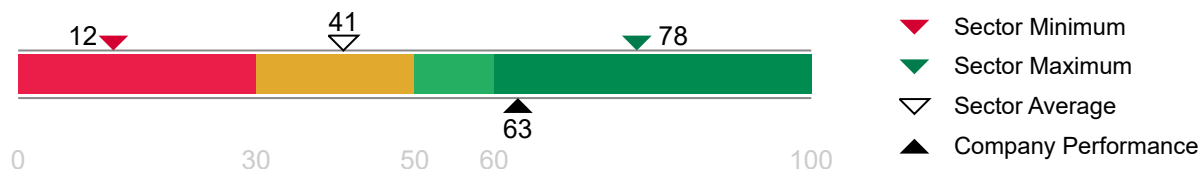
<b>Results</b>	<b>20</b>
Performance	0
Trends	65

Business behaviour (C&S)

Score: 67

C&S1.1 Logistics safety / Passengers safety

(score: 63, weight: 2)



Visibility of commitment

The company has issued a formalised commitment to passenger and logistics safety in its Ethical charter.

In addition, the company targets to cut by half the number of fatal accidents on the network for their clients, employees and sub-contractors by 2020 with 2015 as base year.

Relevance of commitment

The company's commitment addresses passenger safety and / or logistics safety and crisis management. Moreover it has adopted a preventive approach.

The company developed a proactive behaviour aimed at every agent, so that they may contribute effectively to the system of continuous improvement by indicating to his supervisor all the incidents and elements that may lead to an incident. Moreover, the company has also put in place new tools that detect and use small safety issues to anticipate possible bigger future safety failures.

Ownership of commitment

The commitment applies throughout the company and is supported by senior management. In addition, other employees are directly involved.

The Direction of Safety, Security and Risks (DSSR) is in charge of ensuring the respect of the company's policy on safety.

Prevention systems

The company has set up a comprehensive system to ensure passenger safety and / or hazardous safety that includes:

- Quality management system (e.g. ISO 9001/ TQM 9002/9003/ Six Sigma)
- Internal audits
- External audits in terms of passenger and / or hazardous product safety
- Sector-specific certification schemes
- Team in charge of gathering intelligence on passenger and / or hazardous product safety
- Training and awareness raising
- R&D to develop safer products
- Monitoring / Reporting of incidents

- Internal audits: Every three years the company audits its operational entities.
- External audits in terms of passenger safety: The French State conducts a strategic audit of the safety of the French railway system.
- Sector-specific certification schemes: The French Railway Safety Authority renewed the company's safety agreement for five years.
- Team in charge of gathering intelligence on passenger safety : The Direction of Safety, Security and Risks (DSSR) is in charge of gathering intelligence on passenger safety.
- Training: The company provides training to employees on railway safety, especially on security at railway construction sites. The company also conducts

awareness raising campaigns on safety for the public. This includes topics such as safety when crossing railways.

- R&D to develop safer products: The R&D is conducted with the support of the Engineering Department, the company has an investment programme, which aims to renew its infrastructure and to address dangerous level crossings. This investment programme amounted to €139 million in 2018.

- Monitoring / Reporting of incidents: The company monitors and reports the number of incidents on its rail network and related deaths and injured.

**Crisis management system**

The company has allocated significant human and material resources to its crisis management system and to alert its potential clients.

SNCF Réseau elaborated the "Plan de Continuité d'Activité" aimed at treating the major risks of floods, and ensuring the operations are dispatched in a way avoiding the impacts of the floods on operational safety. Each client has a key account manager who keeps them informed in case of incident that may affect their activities.

**Coverage of the prevention systems**

The company has set up such systems throughout the company.

The measures are implemented in France from where the company generates 100% of its revenues.

**Stakeholders' feedback**

A review of stakeholder sources revealed that the Company is involved occasional controversies of high severity.

As of 09/2019, SNCF Réseau was involved in 2 controversies

- Case 1 (01/04/2019): UPDATE: Le Parisien revealed internal documents regarding the SNCF train derailment

- Case 2 (03/07/2018): SNCF fined 600,000 euros for accident

A complete analysis of the severity of each case is available in Vigeo Eiris' Controversy Profile.

**Company's responsiveness**

Overall, the company is reactive.

For each of the above mentioned cases, SNCF Réseau's response is considered:

- case 1: The company announced remedial actions for impacted stakeholders in response to the controversy: Internal audits

- case 2: The company is non communicative: the company does not appear to be transparent on this case.

Analysis of SNCF Réseau's management of each case is available in Vigeo Eiris' Controversy Profile.

**Transparency and trends of indicators relative to Logistics safety / Passengers safety**

The company's indicators on the outcomes of its logistics safety / passengers safety policy have improved, but not continuously, over the past three years.

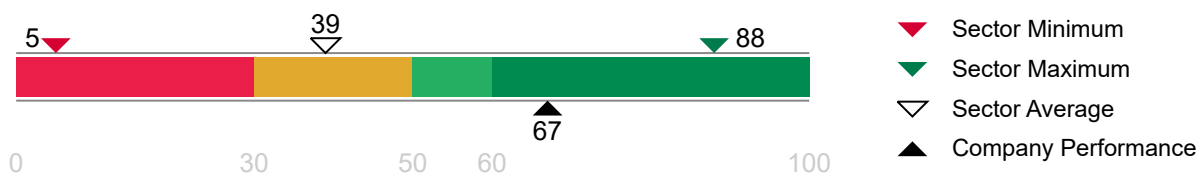
Number of killed and seriously injured per million km of rail, has decreased but not continuously by 65%, from 0,182 in 2016 to 0,119 in 2018.

<b>Leadership</b>	<b>93</b>	<b>Implementation</b>	<b>77</b>	<b>Results</b>	<b>20</b>
Visibility	100	Means & resources	82	Performance	15
Relevance	100	Coverage	65	Trends	30
Ownership	65				



### C&S1.3 Responsible customer relations

(score: 67, weight: 2)



#### Visibility of commitment

The company has issued a formalised commitment on the quality of the services delivered in its satisfaction survey.

#### Relevance of commitment

The company comprehensively commits to informing clients on their rights, before signing a contract and to keep clients fully informed during the execution of the contract. It will also compensate any problem that occurs.

The company's commitment addresses the quality of the services delivered. Beyond legal obligations, SNCF Réseau is committed to develop customer relationships through updated and timely information. SNCF Réseau also develops a commercial offer in which penalties and compensation means are expected in case of service delivery issues.

#### Ownership of commitment

The commitment applies throughout the company and is supported by senior management. In addition, other employees are directly involved.

The Deputy Director of the Clients and Services department, supported by 10 Territorial Directors, is responsible for responsible customer relations.

#### Means allocated

The company has set up comprehensive measures to ensure that customers are treated appropriately and that contracts are respected:

- Training of sales staff/ project leaders
- Sales evaluation based on client satisfaction indicators
- Information on customer rights
- Information on company duties towards customers
- Specific contractual condition
- Quality management system

Information on customer rights and Information on company duties towards customers: In the company's reference document of national railroad network, are stated customers rights and the company's duties towards them.

- Specific contractual condition: The company has a general and specific contractual conditions, depending on the usage made by its clients of the railway network.

- Quality management system: The company's quality management system is in place since 2014 and his purpose is to continually improve the quality of service provided to the clients of the railway network.

#### Complaints management system

There is a formalised and accessible system to handle complaints, with detailed disclosure on procedures and fair treatment coordinated by a third party.

The ARAFER (regulatory authority for railway and road activities) manages the complaints and is guarantees the equal treatment of the company's customers. It is

*stated in the contract between the state and SNCF reseau that the company will take, after notice of ARAFER, if applicable, corrective action if one of the parties fails to meet its obligations contract or if exceptional circumstances affect the availability of public financing or on the financial roadmap of SNCF Réseau.*

**Coverage of means**

The company has set up such systems throughout the company.

**Results**

Information disclosed on performance indicators such as client satisfaction or client retention is insufficient.

**Stakeholders' feedback**

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

*As of 09/2019, SNCF Réseau did not appear to be involved in any controversy related to this sustainability driver.*

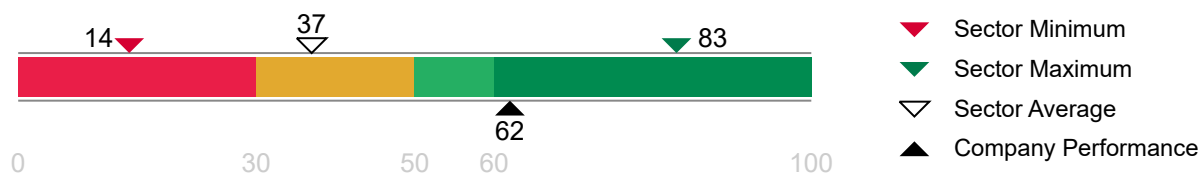
<b>Leadership</b>	<b>79</b>
Visibility	65
Relevance	100
Ownership	65

<b>Implementation</b>	<b>86</b>
Means & resources	100
Coverage	65

<b>Results</b>	<b>35</b>
Performance	35

### C&S2.3 Integration of environmental factors in the supply chain

(score: 62, weight: 2)



#### Visibility of commitment

The company has issued a formalised commitment to including environmental factors in supply chain management in its:

*Ethical charter.*

#### Relevance of commitment

The company's environmental requirements for suppliers address the main relevant issues in the sector:

- ISO 14001 certification of all suppliers
- Certification of products purchased

#### Ownership of commitment

The commitment applies throughout the company and is supported by senior management. In addition, other employees are directly involved.

*The Network Purchasing Department, "Direction des Achats Réseau", supervises the company's responsible supply policy.*

#### Means allocated

The company has set up comprehensive measures to include environmental factors in supply chain management:

- integration of environmental issues into contractual clauses
- supplier questionnaires
- supplier support (training, technical assistance, etc.)
- training/awareness raising of employees in charge of purchasing
- non-compliance procedures for suppliers (re-auditing, re-training, eventual ending of contracts)
- risk assessments for suppliers

- *Integration of environmental issues into contractual clauses: The company includes environmental factors in supply chain management through the integration of environmental issues into contractual clauses.*
- *Supplier questionnaires: The company evaluates the environmental performance of its suppliers through a questionnaire that it sends.*
- *supplier support: SNCF Réseau has a dedicated team to help suppliers integrate the environmental and social factors required of them to work with the company.*
- *Training/awareness raising of employees in charge of purchasing: The employees in charge of purchasing go through training modules on responsible and sustainable purchasing which covers environmental factors.*
- *Non-compliance procedures for suppliers: When a supplier does not achieve his objectives in which there is an environmental clause, the company assesses the issue and accompany's the suppliers so that the CSR objectives can be achieved, however other measures such as audits and sanctions can be taken.*
- *Risk assessments for suppliers: The department of responsible purchasing has put in place an environmental evaluation of suppliers with the highest environmental risks.*

**Audits of suppliers/subcontractors**

*The company has assigned EcoVadis an independent third party to carry out environmental assessment to check the qualifications of the key suppliers. If major environmental risks are identified or in specific markets, dedicated environmental audits are carried out by external auditors.*

**Coverage of Audit**

There is no evidence that such means cover the main purchases/suppliers.

**Share of corrective measures vs problems uncovered**

The company does not disclose quantitative data on the share of environmental problems in the supply chain that were addressed by corrective measures.

**Stakeholders' feedback**

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

*As of 09/2019, SNCF Réseau did not appear to be involved in any controversy related to this sustainability driver.*

<b>Leadership</b>	<b>65</b>
Visibility	65
Relevance	65
Ownership	65

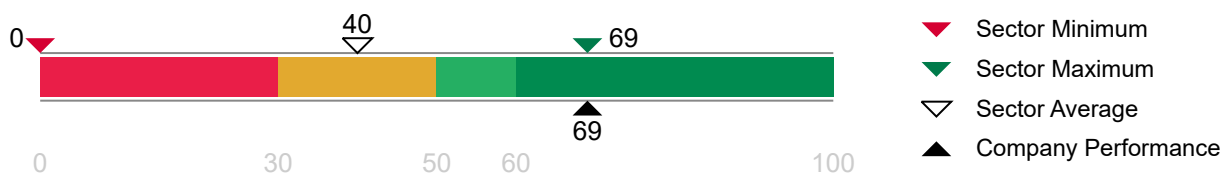
<b>Implementation</b>	<b>79</b>
Means & resources	100
Coverage	30

<b>Results</b>	<b>43</b>
Performance	43

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## C&S2.4 Integration of social factors in the supply chain

(score: 69, weight: 3)



### Visibility of commitment

The company has made references to including social factors in supply chain management in its Ethical charter. In addition, it set a target of EUR 17m of solidarity purchase by 2020. Of note, SNCF Réseau is a signatory of the French Responsible Procurement Charter which includes social criteria while selecting suppliers.

### Relevance of commitment

The company's social requirements for suppliers address all the relevant issues in the sector:

- Freedom of association and right to collective bargaining
- Abolition of child labour
- Abolition of forced labour
- Non-discrimination
- Health and Safety
- Decent wages
- Working hours
- Other rights (e.g. prevention of cruel, degrading and inhuman behaviour, etc.)

- Other rights: prohibition of illegal work

### Ownership of commitment

The commitment applies throughout the company and is supported by senior management. In addition the Network Purchasing Department, "Direction des Achats Réseau", supervises its responsible supply policy.

### Means allocated

The company has set up comprehensive measures to include social factors in supply chain management:

- integration of social issues into contractual clauses
- supplier questionnaires
- supplier support (training, technical assistance, etc.)
- training/awareness raising of employees in charge of purchasing
- non-compliance procedures for suppliers (re-auditing, re-training, eventual ending of contracts)
- risk assessments for suppliers

- Integration of social issues into contractual clauses: The company includes social factors in supply chain management through the integration of social issues into contractual clauses.

- Supplier questionnaires: The company's main suppliers are submitted to the Ecovadis assessment.

- Supplier support: SNCF Réseau has a dedicated team to help suppliers integrate social factors required of them to work with the company.

- Training/awareness raising of employees in charge of purchasing: The employees

*in charge of purchasing go through training modules on responsible and sustainable purchasing which covers social factors.*  
 - *Non-compliance procedures for suppliers: When a supplier does not achieve his objectives in which there is a social clause, the company assesses the issue and accompany's the suppliers so that the CSR objectives can be achieved, however other measures such as audits and sanctions can be taken.*  
 - *Risk assessments for suppliers: The department of responsible purchasing has put in place a evaluations of suppliers risks which covers social factors.*  
*Of note: the company has a suppliers newsletter, a website dedicated to the communication with suppliers and organises a yearly convention with the 100 most important suppliers.*

**Audits of suppliers/subcontractors**

*The company has assigned EcoVadis an independent third party to carry out social assessment to check the qualifications of the key suppliers. If major social risks are identified or in specific markets, dedicated social audits are carried out by external auditors.*

**Coverage of Audit**

There is no evidence that such means cover the main purchases/suppliers.

**Share of corrective measures / problems uncovered**

The company does not disclose quantitative data on the share of social problems in the supply chain that were addressed by corrective measures.

**Stakeholders' feedback**

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

*As of 09/2019, SNCF Réseau did not appear to be involved in any controversy related to this sustainability driver.*

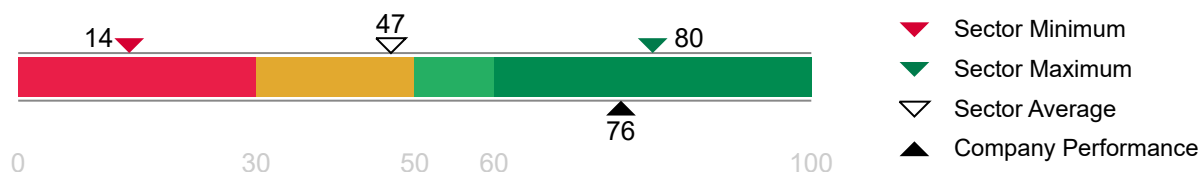
<b>Leadership</b>	<b>86</b>
Visibility	100
Relevance	100
Ownership	65

<b>Implementation</b>	<b>79</b>
Means & resources	100
Coverage	30

<b>Results</b>	<b>43</b>
Performance	43

**C&S3.1 Prevention of corruption**

(score: 76, weight: 3)



**Visibility of commitment**

The company has issued a formalised commitment to preventing corruption in its Ethical Charter, and set as a target to train 100% of its most exposed employees to the training programme "Risks of corruption and influence peddling. In addition, the company is a signatory of the Global Compact and communicates on this principle.

**Relevance of commitment**

The company's commitment to preventing corruption addresses its main responsibilities:

- giving / receiving bribes
- restriction of facilitation payments
- gifts and invitations
- extortion
- fraud
- embezzlement
- money laundering
- conflicts of interest
- illegal financing of political parties
- prohibition of facilitation payments

**Ownership of commitment**

The commitment applies throughout the company and is supported by senior management. In addition, other employees are directly involved.

*The Ethics department is in charge of the company's policy implementation in this regard.*

**Involvement of employees**

The company has instituted formal training programmes for relevant employees and contractors on corruption prevention.

*The Ethics department is an operational unit within SNCF Group, dedicated to emphasising the importance of ethics and carrying out all training to relevant employees that may be exposed to a corruption issue. All employees are required to sign an annual statement of compliance to the ethical charter which covers the issue of corruption and all suppliers are required to sign a compliance statement to the ethical charter as well.*

**Means allocated**

The company has set up internal controls to prevent corruption that include:

- approval procedures for gifts, etc. by an independent department
- external investigations of allegations
- the possibility to contact internal audit, legal or compliance departments directly & confidentially
- a dedicated confidential hotline or email address

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- internal audits (internal verification of compliance with the company's code of conduct etc.)
- risk assessment of company vulnerability
- due diligence in evaluating contracts/suppliers
- systems for appointment/remuneration of agents
- identify and black list known bribe payers
- external audits (by an independent, external specialised organisation)

- *The possibility to contact internal audit, legal or compliance departments directly & confidentially: The possibility to contact ethics department directly & confidentially.*

- *A dedicated confidential hotline or email address: A whistle-blower scheme is in place that can be contacted for corruption issues.*

- *Risk assessment of company vulnerability: The company has a risk mapping that identifies, analyses and prioritises risks of exposures to corruption.*

- *Due diligence in evaluating contracts/suppliers: SNCF Réseau has issued an ethical charter for its suppliers that covers due diligence in evaluating contracts for its suppliers.*

**Coverage of Means allocated**

The measures implemented cover all significant parts of the company as well as sales agents and business partners.

**Reporting**

The company discloses quantitative data on the corruption incidents reported internally and on how they were handled:

*The company discloses the number of alerts received by the ethics department, the nature (fraud, conflict of interest etc...), the admissibility and the results of the investigation, with the actions taken.*

**Stakeholders' feedback**

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

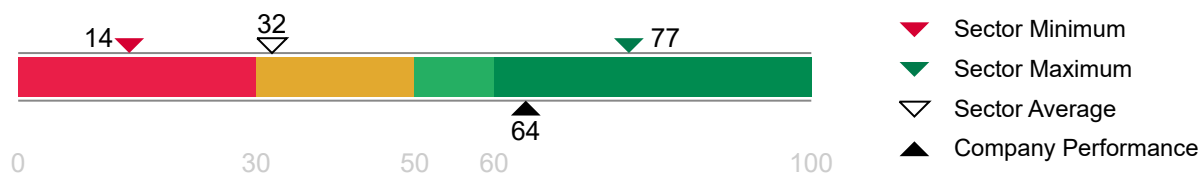
*As of 09/2019, SNCF Réseau did not appear to be involved in any controversy related to this sustainability driver.*

Leadership	76	Implementation	76	Results	77
Visibility	100	Means & resources	65	Performance	77
Relevance	65	Coverage	100		
Ownership	65				



**C&S3.2 Prevention of anti-competitive practices**

(score: 64, weight: 2)



**Visibility of commitment**

The company has issued a formalised commitment to prevent anti-competitive practices in its:

*Ethical Charter.*

**Relevance of commitment**

The company's commitment to preventing anti-competitive practices addresses its main responsibilities:

- market-sharing
- abuse of dominant position
- dumping
- industrial espionage
- price-fixing
- non respect of confidential agreements

**Ownership of commitment**

The commitment applies throughout the company and is supported by senior management. In addition, other employees are directly involved.

*The Ethics department is in charge of the company's policy implementation in this regard.*

**Involvement of employees**

The company has instituted formal training programmes for relevant employees on the prevention of anti-competitive practices.

*The Ethics department is an operational unit within SNCF Group, dedicated to emphasising the importance of ethics and carrying out all training to relevant employees that may be exposed to an anti-competitive issue. All employees are required to sign an annual statement of compliance to the ethical charter which covers the issue of corruption. Moreover, SNCF Réseau launched a training campaign during the deployment of the confidential information management plan to insure fair competition. Today, training on the need to respect confidentiality rules and the practical application of the management plan for confidential information is always regularly provided to agents whose missions lead to the use of such information in the light of the challenges related to the development of competition in the railway sector.*

**Means allocated**

The company has set up reporting systems to prevent anti-competitive practices that include:

- approval procedures for contract prices etc. by an independent department
- the possibility to contact internal audit, legal or compliance departments directly & confidentially
- a dedicated confidential hotline or email address

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- risk assessment of vulnerability areas within the company
- internal audits (internal verification of compliance with the company's code of conduct etc.)
- external audits (by an independent, external specialised organisation)
- external investigations of allegations

- Approval procedures for contract prices etc. by an independent department: The company is subject to the power of control and sanction of ARAFER, who reviews all attributions of contracts.  
 - The possibility to contact internal audit, legal or compliance departments directly & confidentially: The Ethics department can be contacted directly & confidentially.  
 - A dedicated confidential hotline or email address: A whistle-blower scheme is in place that can be contacted for anti-competitive issues.

**Coverage**

The measures implemented cover all significant parts of the company as well as sales agents and business partners.

**Reporting**

The company explicitly states that no antitrust cases were reported internally during the period under review.

**Stakeholders' feedback**

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

*As of 09/2019, SNCF Réseau did not appear to be involved in any controversy related to this sustainability driver.*

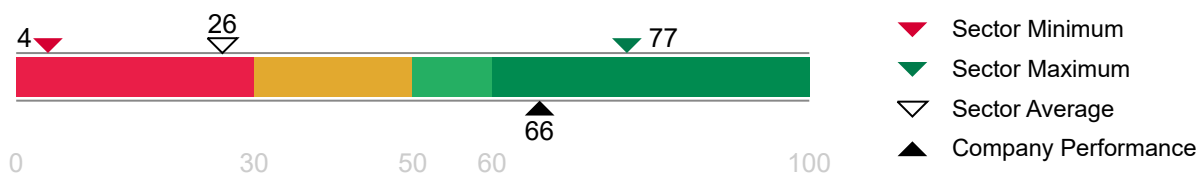
<b>Leadership</b>	<b>65</b>
Visibility	65
Relevance	65
Ownership	65

<b>Implementation</b>	<b>51</b>
Means & resources	30
Coverage	100

<b>Results</b>	<b>77</b>
Performance	77

**C&S3.3 Transparency and integrity of influence strategies and practices**

(score: 66, weight: 2)



**Visibility towards stakeholders**

The company has issued a formalised and accessible commitment to ensuring transparency and integrity of lobbying practices on its Ethical Charter and Public Affairs Charter. In addition, Transparency international France was involved in the creation of the Public Affairs Charter.

**Comprehensiveness of the commitment**

The company's commitment addresses all its responsibilities towards ensuring transparency and integrity of lobbying practices:

- to prevent any contrast with public international conventions (UN, ILO, OECD)
- not obtain or try to obtain information, or any decision, dishonestly
- not to misrepresent themselves to mislead third parties and/or staff of public authorities
- openly declare the company's business interests
- ensure that information provided is up-to-date, complete and not misleading
- not induce staff of PA to contravene rules of behaviour applicable to them
- if the company employs former staff of PA, to respect their obligation of confidentiality
- to be transparent on the amounts of donations to political parties/organisations

**Ownership of commitment**

The commitment applies throughout the company, supported by senior management. In addition SNCF Réseau (through SNCF) collaborates with l'Union Internationale des Chemins de Fer (UIC) and la Communauté des Chemins de Fer Européens (CER), EIMRail and RailNet Europe regarding its lobbying positioning and activities.

**Involvement of employees**

The company has instituted formal training programmes for relevant employees on transparency and integrity of lobbying practices, however, it is not clear if employees are made personally responsible for the transparency and integrity of lobbying practices.

In its answers to Vigeo Eiris, the company states that each year specific training on lobbying and influence strategies is conducted for employees in charge of public affairs in the regional establishments or the various entities of the group.

**Measures allocated**

The company appears to allocate exhaustive measures to ensuring transparency and integrity of lobbying practices:

- publication of detailed information on lobbying activities
- approval procedures for gifts, travel or other privilege by an independent department
- a dedicated confidential hotline or email address
- internal monitoring for lobbying budget

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- internal audits for lobbying activities
- independent party for monitoring lobbying budget/external audit
- external investigations of allegations
- disclosure of the positions in the period of preparation of a debate and during the debate

- *Publication of detailed information on lobbying activities: Since the entry into force of the Sapin 2 law and the entry in the national register of representatives of interests we publish every year an activity report. At the European level, the company updates the data published in the transparency register every year.*

- *A dedicated confidential hotline or email address: A whistle-blower scheme is in place that can be contacted for lobbying issues.*

- *Internal monitoring for lobbying budget: The company discloses its lobbying budget at HATVP and in the european transparency register.*

- *Disclosure of the positions in the period of preparation of a debate and during the debate: At the French level, interest advocacy actions are reported to the HATVP. The object of each action thus makes it possible to know the positions defended by SNCF Réseau. In addition, the company are regularly heard in parliament. At European level, an up-to-date summary list of the meetings with the European Commission is available on the transparency register. In addition, the responses to the consultations on the legislative and regulatory proposals are published on the European Commission website, as well as position notes.*

*Of note, the company states that it has an approval procedures for gifts, travel or other privilege by an independent department, however no further details are provided.*

**Coverage**

*SNCF Group is registered on the European Commission's Register of Interest Representatives and to the French national register "Haute Autorité pour la Transparence de la Vie Publique".*

**Reporting**

The company reports the total budget dedicated to lobbying practices.

*According to the French national register, SNCF Réseau budget ranges below EUR 10,000.*

**Stakeholders' feedback**

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

*As of 09/2019, SNCF Réseau did not appear to be involved in any controversy related to this sustainability driver.*

<b>Leadership</b>	<b>83</b>
Visibility	100
Relevance	65
Ownership	100

<b>Implementation</b>	<b>67</b>
Means & resources	82
Coverage	30

<b>Results</b>	<b>49</b>
Performance	49

Corporate governance

Score: 62

CGV1.1 Board of Directors

(score: 52, weight: 3)



No specific committee is in charge of director nomination, which might raise concerns.

**[UNLISTED COMPANIES] Existence and independence of Nomination Committee**

Nine directors are appointed by the French Government and seven by SNCF, which is owned by the French State. The remaining eight Board members are employee representatives. Of note, the French Government follows the local law setting the terms of nomination of directors.

**Independence of the Board Chairman**

The roles of Chairman and CEO are combined and there is no senior independent director.

**Responsibility allocated over CSR issues**

Information on the responsibilities allocated over CSR issues is insufficient.

Of note, The Head of the CSR Department, reports to Michel Etchegaray member of the Executive committee and there is no CSR committee.

**[UNLISTED COMPANIES] Corporate governance strategy**

The company has formalised a corporate governance framework, covering most of the relevant features:

- Interaction between shareholders and board (conflict of interests)
- Organization of the Board and its functioning
- Definition of the company's risk profile (risks mapping and management)
- Executive remuneration policy
- Integration of the stakeholders perspectives/interests into governance framework

**[UNLISTED STATE-OWNED COMPANIES] State ownership policy and procedures**

The government has developed and issued an ownership policy, clearly defining the objective of state ownership and its role in the governance of the State-owned enterprise. In addition, the government has publicly disclosed a detailed Board nomination process.

**Share of independent shareholder-elected Board members**

[UNLISTED COMPANIES] The majority of Board members are non-executive directors.

**Diversity of the skills and backgrounds of the Board**

The Board of Directors diversity appears to be advanced:

- At least 30% of directors are women

- At least 40% of directors are women
- Employee representative(s) sitting on the Board
- Board members with demonstrated professional experience in the company's sector of activities
- Board members with demonstrated expertise on CSR issues

- At least 40% of directors are women: Half of the Board is composed of women.  
 - Employee representative(s) sitting on the Board: Eight employee representatives sit on the Board.  
 - Board members with demonstrated professional experience in the company's sector of activities : Majority of directors have demonstrated experience in railway, infrastructure or public policy fields, as presented by their current external positions (although no biographies are available).  
 - Board members with demonstrated expertise on CSR issues: Some Board members seem to have CSR expertise in the field of sustainable development, environment and employees management.

**Training and expertise provided to board members**

Members of the Board of Directors may, at their request, receive training relevant to the exercise of their mandate, in particular on the financial, budgetary, industrial and operational specificities of the SNCF Réseau. However, the frequency of these training is unclear.

**Regular election of Board members**

[UNLISTED COMPANIES] Board members are elected regularly, but less often than every 3 years.  
 Board members are appointed for five years terms.

**Evaluation of Board's functioning and performance**

Performance is evaluated regularly, but with no disclosure on the results.  
 The Board of Directors conduct a self-evaluation of its performances annually. To add, every three years, a formal evaluation of the Board is conducted by the Audit and Risks Department.

**Review of CSR issues at Board meeting**

- Most of the relevant CSR issues for the company are discussed at Board level.
- Business ethics
  - Human capital
  - Responsible customers relations
  - Climate change

**Regularity of and attendance at Board meetings**

Regular meetings are held, and attendance rates are disclosed, but these are below 90%.  
 Eight Board meetings were held during 2018 and the attendance rate was 83%.

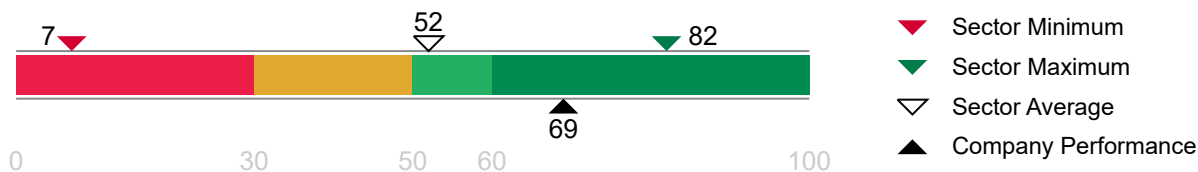
Name of Board member	Role	Executive	Non executive	Employee representative	Nomination	Audit	Remuneration	Former executive	> 9 years on Board	Stock options	Paid>1/2 executive salary	Represent>3% company's shares	Other	Independency
Patrick JEANTET	CEO and Chairman	X										X	Director representing the French State	

Name of Board member	Role	Executive	Non executive	Employee representative	Nomination	Audit	Remuneration	Former executive	> 9 years on Board	Stock options	Paid>1/2 executive salary	Represent>3% company's shares	Other	Independency
Fanny ARAV				X		X								
Stéphane BEAUDET			X									X	Director chosen by the French State	
Ann BILLIAU			X									X	Director chosen to represent SNCF	
Didier BOUSQUIE				X										
Joëlle BRAVAIS		X										X	Director chosen to represent SNCF	
Denis CHARISSOUX			X			X						X	Director representing the French State	
Muriel DAUVERGNE				X		X								
Jean-René DELEPINE				X										
Carole DESNOST		X										X	Director chosen to represent SNCF	
Corinne ETAIX			X									X	Director representing the French State	
Anne FLORETTE			X									X	Director representing the French State	
Cédric GARCIN			X			X						X	Director representing the French State	
Patricia LACOSTE			X									X	Director chosen to represent SNCF	
Anne LASSMAN-TRAPPIE			X									X	Director chosen by the French State	
Dominique MAILLARD	Chairman of the Audit Committee		X			X						X	Director chosen to represent SNCF	
Christine MEQUIGNON				X										
Michel NEUGNOT												X	Director chosen by the French State	
Céline PIERRE				X										
Benjamin RAIGNEAU			X									X	Director chosen to represent SNCF	
Thierry SALMON				X										
Pascale VIE			X			X						X	Director chosen by the French State	
Stéphane VOLANT		X				X						X	Director chosen to represent SNCF	
Guy ZIMA				X										

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**CGV2.1 Audit & Internal Controls**

(score: 69, weight: 2)



**[UNLISTED COMPANIES] Existence and independence of Audit Committee**

All members are non-executive directors, but none of them is independent.  
*None of the 7-member Audit Committee is considered independent.*

**Skills and backgrounds of Audit Committee members**

Members appear to have financial and/or audit experience and relevant operational experience. In addition, at least a member has CSR skills and experience.  
*Charrissoux Denis and Volant Stephane appear to have CSR expertise in the field of sustainable development, environment and employees management.*

**Operational and CSR risks covered by the company's internal controls system**

The internal control system covers the standard issues related to financial, operational, and legal risks. In addition, the system covers most of the CSR risks inherent to the company's business operations.

- Business Ethics
- Human Capital
- Responsible Customer Relations
- Climate Change

**Role of the Audit Committee in overseeing internal and external controls**

The Audit Committee has a comprehensive role that includes:

- Oversee internal audit and internal controls
- Review accounting policies and be responsible for updates
- Nominate the statutory auditor
- Oversee the work of the external auditor
- Approve the type of audit and non-audit services provided and fees paid to the external auditor

**Management of the CSR risks**

Relevant processes dedicated to management of CSR risks are in place:

- Balanced scorecard
- Risk-related training
- Monitoring of key risk indicators
- Reporting system to the Board
- Risk mapping/materiality assessment
- A Board Risk Committee with no executive part of it

*- Monitoring of key risk indicators and Reporting system to the Board: The indicators related to the identified CSR risks are reported and monitored annually in the non-financial performance statement and also, thanks to the CSR dashboard*

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each quarter presented to the various Boards and Committees.  
 - Risk mapping/materiality assessment: A CSR risk mapping was carried out by Ernst & Young, it highlighted 7 major risks and 3 opportunities for SNCF Réseau.

**Independence of the firm's external auditors**

The audit firm receives non-audit fees, but these represent only 5% or less of total fees.

*Non-audit fees represented 0% of total fees paid to Pwc and E&Y in 2018.*

**Inclusion of CSR issues in the company's reporting**

*The company publishes significant CSR reporting on key material issues, with an independent third party assessment of the reliability of key performance indicators. PwC Audit has certified the CSR reporting for SNCF Réseau with a moderate level of assurance.*

**Stakeholders' feedback**

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

*As of 09/2019, SNCF Réseau did not appear to be involved in any controversy related to this sustainability driver.*

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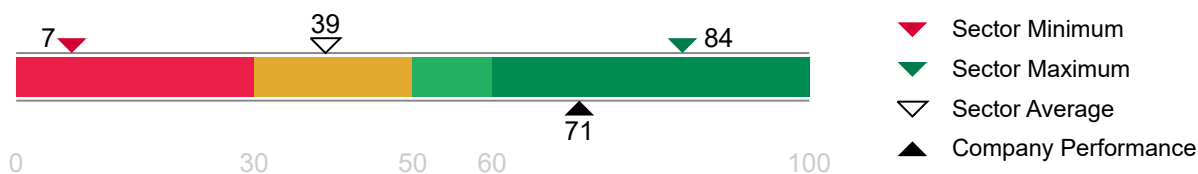
**CGV3.1**      **Shareholders**  
(deactivated)

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**CGV4.1 Executive Remuneration**

(score: 71, weight: 2)



**Disclosure of senior executives' individual remuneration**

Executive remuneration is disclosed but on a collective rather than on an individual basis and not by category or hierarchical level.

**[UNLISTED COMPANIES] Link between variable remuneration and the economic and CSR performance of the company**

CSR performance indicators are considered in the performance review of senior executives but these are not explicit objectives integrated in the determination of their variable remuneration.

**Evolution of CEO-to-employee compensation ratio**

The ratio of CEO compensation vs. average employee salary has been stable, or has decreased.

The ratio of CEO compensation vs. the average employee salary has decreased by 8% over the past three years, from 7.28 in 2016 to 6.69 in 2018.  
 - The CEO compensation has decreased by 6% from EUR 450,000 in 2016 to EUR 422,516 in 2018.  
 - The average employee salary, calculated using the total of wages and salaries over the number of employees, has increased by 2% from EUR 61,786 in 2016 to EUR 63,113 in 2018.

**Stakeholders' feedback**

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

As of 09/2019, SNCF Réseau did not appear to be involved in any controversy related to this sustainability driver.

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## Detailed Scores and Ratings

### CURRENT AND PREVIOUS RATINGS

Period	Environment	Human resources	Human rights	Community involvement	Business behaviour (C&S)	Corporate governance
2019/10	++	++	++	++	++	+
2019/09	++	++	++	++	++	+
2018/01	++	++	++	++	++	+

### SCORES PER DOMAIN

Domain	Average Score	Leadership	Implementation	Results
Environment	78	83	97	29
Human resources	74	87	85	52
Human rights	68	85	55	65
Community involvement	66	67	69	63
Business behaviour (C&S)	67	79	74	51
Corporate governance	62	56	57	73

### SCORES PER CRITERIA

Sub-domain	Criterion	Score
Environment 1	1	100
	2	70
Environment 2	2	68
	6	76

Sub-domain	Criterion	Score
Human resources 1	1	90
	3	81
Human resources 2	4	67
	1	85
Human resources 3	2	65
	3	60

Sub-domain	Criterion	Score
Human rights 1	1	74
	1	55
Human rights 2	4	83

Sub-domain	Criterion	Score
Community involvement 1	1	75
	1	N/A
Community involvement 2	2	48

Sub-domain	Criterion	Score
Business behaviour (C&S) 1	1	63
	3	67
Business behaviour (C&S) 2	3	62
	4	69
Business behaviour (C&S) 3	1	76
	2	64
	3	66

Sub-domain	Criterion	Score
Corporate governance 1	1	52
	1	69
Corporate governance 2	1	N/A
	1	71

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## Overview of the latest updates

Date of the latest update	Information updated
2019/10	ESG Update
2019/09	Controversial Activities Screening
2019/09	<b>Full ESG profile</b>

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