



Orange group responsible communication guideline

Foreword



Caroline Guillaumin,
Group EVP,
Communications

Communication is never neutral. Every word we choose, image we share, or statement we make expresses our intent and responsibility toward the people we're communicating with, whether employees, customers, partners, or society as a whole.

As a major digital player, Orange reaches millions of people around the world. Our campaigns, content, messaging, and the way we work with partners all have a real impact: environmental, social, and cultural.

We have a responsibility to manage that impact carefully. Because Orange is a trusted company. And because our role as communicators is first and foremost to protect the Group's reputation, strengthen its image, and build trust with our audiences.

That starts with one simple commitment: communicating responsibly.

Communicating responsibly means rejecting any practice that undermines trust: inaccurate information, short-lived or empty promises, and greenwashing. It means choosing transparency, especially when it's difficult. Nuance, when it matters. And setting the right example at all times.

Communicating responsibly also means using our influence to support the common good. Promoting responsible digital practices, especially among younger generations. Reflecting the diversity of our audiences. Bringing our commitments to life and helping shape fairer, more sustainable narratives through everything we say and do.

This guideline is everyone's responsibility.

This is not just another document; it's a moral commitment for all of us and the wider ecosystem around us. We encourage everyone to embrace the principles it contains, not as constraints, but as a source of pride and action.

Because building a future based on trust starts with the way we choose to communicate today.



Elizabeth Tchoungui,
Group EVP, CSR

This guideline applies to all Orange Group employees involved in communication activities, as well as to our agencies, suppliers, and partners when working on behalf of Orange.

It is fully aligned with the commitments of the FAIRe program from Union des Marques, the leading responsible communication initiative in France, of which Orange has been a member since its launch in 2018.

Our guiding principles

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Comply with applicable laws and ethical principles

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Manage distribution responsibly

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Create reliable and responsible messaging

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Use AI ethically and frugally

3



Produce inclusive, sustainable, and legitimate content



Comply with applicable laws and ethical principles

1.1 We prevent corruption and conflicts of interest

We comply with the Group's Anti-Corruption Policy and its guiding principles. In particular, we respect all reporting obligations related to gifts and benefits offered or received as part of our activities. Under no circumstances do we use communication activities to secure improper business advantages or serve private interests. We also work to prevent conflicts of interest in the selection and evaluation of agencies, suppliers, and communication partners by applying objective and transparent criteria aligned with the Group Responsible Purchasing Guideline.

1.2 We comply with advertising law and professional standards

We ensure that all communications comply with applicable advertising and competition laws in every country where we operate, including rules governing comparative advertising, commercial claims, and promotional practices. We follow the ethical standards set by professional organizations such as the ARPP¹ and UMICC² in France and their equivalent local bodies, and we encourage our teams to rely on these frameworks when designing and distributing campaign.

1.3 We strictly manage financial communication

As a publicly listed company, Orange is subject to strict regulatory requirements regarding financial communication. We fully comply with embargo periods ahead of the publication of financial results or any material event. We also ensure that any public statements likely to affect financial markets are coordinated with the relevant teams, including finance and legal.

1.4 We protect personal data

We protect the personal data of users, employees, partners, and customers in line with local and international regulations in every country where we operate, especially the General Data Protection Regulation (GDPR) in Europe. Our commitment is built around three priorities: data security, transparency around how data is used, and respect for people's right to control how their data is processed. These commitments also apply to our agencies, suppliers, and partners and are set out in the Orange Group Personal Data Protection Guideline, available on orange.com.

1.5 We respect fundamental human rights

We don't organize any activity or event that could put the health, safety, or dignity of participants at risk. More broadly, we apply the Group Human Rights Policy across all our geographies and share it with all stakeholders. Any breach of the legal, regulatory, or ethical framework can be reported through our "Hello Ethics" system available on orange.com.

1. ARPP : Autorité de Régulation Professionnelle de la Publicité (French Professional Advertising Regulation Authority)
2. UMICC : Union des Métiers de l'Influence et des Créateurs de Contenu (Union of Influencers and Content Creators)



Create reliable and responsible messaging

2.1 We guarantee the reliability of our content

Any information published in the name of Orange is verified, sourced, and approved before publication. If there is any doubt about the accuracy of content, we don't publish it. We update or remove any content that becomes inaccurate or outdated without waiting for it to be challenged. Testimonials from users, customers, partners, or employees used in our communications are authentic, collected with their consent, and never altered in a misleading way. Every year, we publish our Universal Registration Document, audited by two independent statutory auditors, and available on [orange.com](https://www.orange.com). This document serves as the reference foundation for our corporate communications, including the corporate website and company brochures.

2.2 We prohibit misleading communication

In our corporate communication, every public commitment must be backed by verifiable data and concrete action, with appropriate context provided around scope, methodology, and reference periods. We ensure that visibility given to commitments reflects their real impact, and we report transparently on both successes and areas where progress is still needed.

In our commercial communication, we ensure that every sales claim, product feature, and customer promise is accurate, verifiable, and not misleading. We also make sure no information essential to consumer decision-making is omitted or minimized, including within terms and conditions and legal notices.

For environmental claims related either to our offers or to our corporate commitments, we have established seven guiding principles for Group marketing and communication teams. These principles ensure rigor, proportionality, and compliance in all messaging and related actions. In particular, content must be explicit, unambiguous, and precise to help prevent any risk of greenwashing.

2.3 We use our influence to promote positive values

Our communication activities do more than inform or showcase the brand: they help shape perceptions of the world around us. We deliberately choose to use our creativity to support positive values, including responsible digital uses (#ForGoodConnections), equal opportunities (Orange Digital Centers/Foundation), gender equality (Hello Women), and the circular economy (RE program), while making sure these ideas feel real, relatable, and inspiring.

Our sponsorship activities reflect the same commitments. For example, Orange is the first company in France to dedicate an equal 50:50 football sponsorship budget to men's and women's soccer.



Produce inclusive, sustainable, and legitimate content

3.1 We communicate in a clear and accessible way

We communicate to be understood by everyone. We use clear, direct, jargon-free language adapted to each audience and communication channel, without compromising accuracy. Beyond editorial clarity, we integrate digital accessibility requirements from the earliest stages of campaign and content design: video subtitles, alternative image text, sufficient color contrast, screen-reader compatibility, and more. We monitor regulatory developments in this area across all our markets. Available via orange.com, our [disability guidelines](#), are shared internally and with our partners. They raise awareness around disability issues and encourage the use of inclusive language.

3.2 We reflect audience diversity without stereotypes

Our content accurately reflects the diversity of our audiences, including age, gender, background, religion, sexual orientation, neurotype, disability, and appearance, without relying on stereotypes, discrimination, or degrading representation. We also ensure our communications remain respectful of local cultural contexts in every geography where we operate.

3.3 We respect copyright and image rights

Any content used in our communications, including images, music, video, or text, must either be rights-free or properly licensed. Content created by suppliers and agencies is governed by contractual rights agreements defining scope, media channel, and duration.

Any content whose rights have expired is removed immediately.

We also collect image rights authorization from every individual appearing in our content, including during events. Consent from legal guardians is mandatory for minors (see 3.4).

3.4 We pay particular attention to how children are reflected

We apply strict rules governing the representation of children in advertising, marketing materials, and media content, in line with our Children's Rights and Protection in the Digital Age Policy, published and available on orange.com.

3.5 We eco-design our campaigns, events, and digital platforms

We integrate eco-design principles from the earliest stages of campaign and corporate website development, in line with the General Framework for the Eco-Design of Digital Services (RGESN). We apply restraint when choosing formats, production volumes, and distribution channels.

These efforts helped orange.com rank first in the Green IT digital eco-design benchmark published in 2025.

For events, we also work continuously to improve environmental performance. Every event involves careful consideration around venue choice, transportation, stand design, materials used or reused, promotion, catering, and waste management.



Manage distribution responsibly

4.1 We protect the quality of media environments

We integrate brand safety criteria into media buying decisions to avoid funding, even indirectly, media outlets that promote hate, misinformation, or values contrary to our own. We prioritize high-quality media environments and partners committed to responsible practices. We also require full transparency from partners across the programmatic advertising supply chain.

4.2 We target ethically and transparently

We manage advertising targeting carefully to avoid discriminatory or intrusive practices, especially toward vulnerable audiences. We avoid targeting younger audiences who do not meet eligibility criteria defined by local regulations. We prioritize first-party data collected with users' explicit consent, in line with our Personal Data Protection Guideline.

We regularly measure and optimize campaign relevance to reduce overexposure and spam.

4.3 We guarantee authentic performance metrics

We do not use artificial amplification practices such as fake reviews, fake followers, simulated engagement, or any other form of audience manipulation. Our performance indicators are measured and reported honestly, without manipulating metrics.

4.4 We manage the carbon impact of our campaigns

We measure and monitor the carbon footprint of our media campaigns alongside our partners by prioritizing eco-distribution practices and integrating environmental impact criteria into our channel and advertising format choices. We also integrate environmental criteria into tenders and supplier selection processes involving agencies, media partners, and production companies. These commitments support our goal of reaching net zero carbon by 2040.

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Use AI ethically and frugally

5.1 We only work with validated tools

We exclusively use AI tools approved by the Group, whether for content creation or advertising optimization. We do not input any confidential, personal, or strategic data into unapproved tools. These requirements extend to our service providers and partners: we ask them to inform us of any AI usage in their missions for Orange- such as the tools used, data processed, and content generated- and to guarantee a level of protection equivalent to ours. This requirement is incorporated into our calls for tenders and contracts.

5.2 We develop our teams' skills

We train our teams to ensure they use AI tools appropriately and with full awareness of their potential consequences. For this purpose, the training program "Building Trust with Data and AI," launched in 2026, is mandatory for all Group employees. We also provide them with the necessary resources to evaluate AI applications proposed by our partners.

5.3 we ensure human oversight and full transparency in our AI productions

AI is a creative aid tool, never an autonomous author: all AI-assisted content is reviewed and validated by a trained professional. When content is entirely or partially generated by AI, we systematically apply the label "Designed by us, generated by AI."

5.4 We regulate the use of AI in content production

We distinguish three categories of usage in content creation, defined based on their level of ethical, legal, and operational risk- the latter referring to any quality risk that could affect the coherence or reputation of the brand.

Authorized uses: translation, subtitling, metadata generation, assisted writing, automatic transcription, minor image retouching (color correction, resizing, small element or imperfection removal).

Restricted uses: creation of entirely AI-generated backgrounds, illustration generation, substantial image modifications (changing appearance, pose, or other elements while maintaining some resemblance to the original), silhouette generation (human shapes without details or visible faces), voice generation. These uses are reserved for creative professionals (art directors, graphic designers), who are solely responsible for ensuring rights compliance, brand consistency, and preventing anomalies, biases, or stereotypes.

Prohibited uses: generation of avatars of existing individuals (public figures, clients, employees - even with their consent), creation of fictional human characters with visible details or faces, AI-generated music, manipulation of voices or images of real people for deceptive purposes (including deepfakes). These practices are strictly forbidden within the Group.

5.5 We regulate the use of AI in content distribution

When using AI tools to optimize distribution (targeting, personalization, recommendations), we ensure respect for individuals' rights and our ethical commitments. We verify that algorithms do not reproduce discriminatory biases, do not unjustly exclude certain audiences, and comply with advertising rules. Human oversight is maintained for high-impact decisions, and we aim to limit excessive advertising exposure and energy consumption.

5.6 We use AI sparingly and responsibly

Aware of the high energy consumption involved in AI-generated images, we prioritize proportional and environmentally aligned use. We favor existing content before resorting to AI generation, consulting resources such as the Orange Brand Image and Illustration Bank. We also promote sharing productions to limit redundant creations.

Implementation and monitoring

This guideline is available on orange.com and the Orange intranet.

It will be updated whenever necessary by the Orange Group Communication and CSR departments. Marketing and Communication teams across entities and subsidiaries are responsible for applying it within their respective areas.

The Group supports this work through tools, best practices, and awareness initiatives carried out by Orange and its partners, including CLEMI, La Mednum, Make.org Foundation, AHADI Foundation, ICMEC, and ADEME.

More information

This guideline is aligned with the following policies and standards:

Orange Group Policies:

- > [Orange group anti-corruption policy](#)
- > [Human rights Group Policy](#)
- > [Orange's Policy Child Protection and Children's Rights in the Digital Age](#)
- > [Orange Group Diversity, Equity, and Inclusion Policy](#)
- > [Orange Group's Environment and Energy Policy](#)

Group Guidelines:

- > [Orange Group Responsible Procurement Charter](#)
- > [Orange Personal Data Protection Charter](#)
- > [Orange's Data and Artificial Intelligence Ethical Charter](#)

Group Standards:

- > [Orange guidelines on the prevention of corruption](#)
- > [7 principles of the Orange Groupe applying environmental claims](#)
- > [Disability Guidelines](#)

External Frameworks:

- > [General Framework for Eco-designing Digital Services \(RGESN\)](#)
- > [Union des Marques FAIRe Program](#)

Contact

- > [Orange Brand Site](#)

