



Communication on Progress – ENGIE and Global Compact

Category Global Compact Advanced Company

October 2022

This document shows the correspondence between the information contained in ENGIE 2022 Integrated Report published in March 2022 and the 21 'GC Advanced' criteria of the Global Compact.

The following sources are also associated with the correspondence grid:

- the ENGIE 2021 Universal Registration Document published in March 2022
- the ENGIE website: www.engie.com
- previous Integrated reports and Registration documents when necessary



Self Evaluation

1. Does your COP contain, if applicable, a description of policies and practices related to your business operations in high risk areas and / or affected by conflict ?

The consequences of the events affecting Ukraine's sovereignty on the energy market and the Group's activities are available on ENGIE.com :

- <https://www.engie.com/en/journalists/press-releases/statement-on-the-crisis-in-ukraine>
- <https://www.engie.com/sites/default/files/assets/documents/2022-07/ENGIE%20H1%202022%20Presentation%20VDEF.pdf#page=22>
- <https://www.engie.com/en/journalists/press-releases/the-engie-group-is-taking-action-to-tackle-the-energy-crisis-and-support-affordability>

2. How are the accuracy and scope of information in your COP evaluated by a credible third party?

2022 Integrated Report and 2021 Universal Registration Document contain financial, environmental, social and governance information of the Group. This information is annually audited by the Statutory Auditors.

Their report is available in [2021 Universal Registration Document pages 125 to 129 and page 52 of the 2022 Integrated Report](#)

3. Does your COP incorporate high standards of transparency and disclosure?

2022 Integrated Report learns from the reference framework of the International Integrated Report Council. The Group published its first report in November 2014. The 2022 Integrated Report was published in March 2022 before the Group General Annual Meeting.

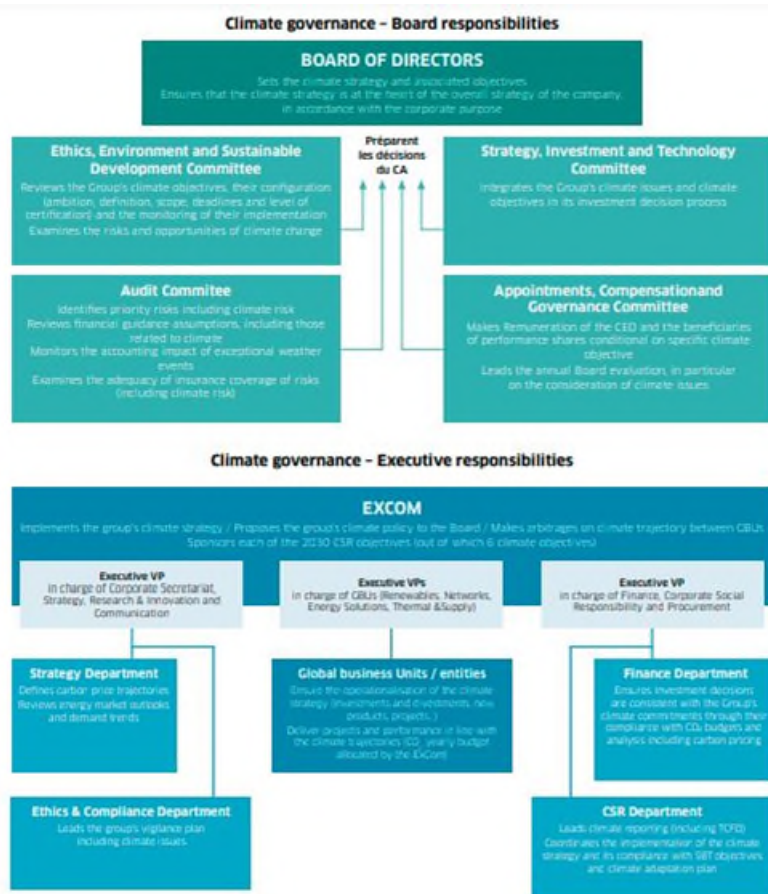


I. Implementing the ten principles into strategies and operations

Criterion 1 : The COP describes mainstreaming into corporate functions and business units.

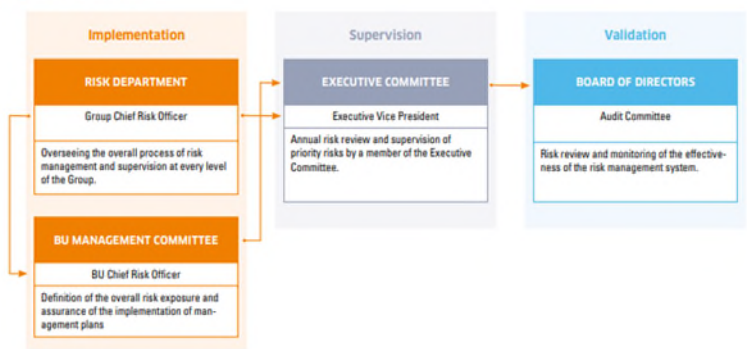
The Corporate Social Responsibility policy, updated in 2022, establishes the Group's CSR priorities and commitments, consistent with the Group's various policies (environmental, HR, Ethics, Purchasing, etc.), to bring together the skills of all, create shared value and contribute to the achievement of the Sustainable Development Goals defined by the UN.	CSR Policy
CSR is steered at the highest level of the Group by the Board of Directors through the Ethics, Environment and Sustainable Development Committee, which validates the scope of the policies undertaken, the outlook and the action plans, and which in 2019 has been given responsibility for the fight against climate change. The Group Executive Committee validates the proposed orientations in this area beforehand. The CSR Department monitors the Group's CSR performance. It leads a network of CSR managers within the operational entities, regularly reviews the Group's material challenges, ensures the preparation of annual action plans, monitors their implementation through annual CSR performance reviews, pilots the answers to the extrafinancial rating agencies and the monitoring of the CSR 2030 objectives with the assistance of the other departments concerned. Each operational entity ensures that the Group's CSR commitments are respected at local level. Each employee can become a Group CSR ambassador, participate in CSR debates and contribute to the Group's CSR initiatives. The CSR Department runs collaborative workshops with external stakeholders on high-stakes CSR issues.	Cf.2021 Universal Registration Document page 72 : « 3.1.1 CSR policy and governance » Cf ENGIE.com : Board committees

ENGIE relies on a specific governance of climate issues in order to implement its purpose: acting to accelerate the transition to a carbon-neutral economy and achieving its goal of Net Zero Carbon by 2045. It not only includes specific responsibilities for each body but also the integration of climate related issues into the Group's investment and planning processes.



The Ethics and Compliance system is managed by the Ethics Compliance and Group Privacy Department and is supported by managers with the support of the Ethics and Compliance network.



The overall risk management is based on the following organization: Organization of risks  <pre> graph LR subgraph Implementation RD[RISK DEPARTMENT Group Chief Risk Officer Overseeing the overall process of risk management and supervision at every level of the Group.] BMC[BU MANAGEMENT COMMITTEE BU Chief Risk Officer Definition of the overall risk exposure and assurance of the implementation of management plans] end subgraph Supervision EC[EXECUTIVE COMMITTEE Executive Vice President Annual risk review and supervision of priority risks by a member of the Executive Committee.] end subgraph Validation BD[BOARD OF DIRECTORS Audit Committee Risk review and monitoring of the effectiveness of the risk management system.] end RD --> EC BMC --> EC EC --> BD </pre>	
The CSR Executive Committee implements the CSR policy, ensures that Corporate and the Group's various Business Units share and build on their experiences, and manages exchanges on environmental and social responsibility strategies. The Committee meets on a monthly basis under the chairmanship of the Group CSR Director and is made up of: -the Global Business Unit CSR Responsibility managers (one in each BU, member of the Management Committee of the Business Unit) - the regional hub CSR Responsibility managers - members of the Corporate CSR Department Annual Performance Reviews with each Global Business Unit allow to review regularly the Group's material issues, to prepare annual action plans and tracks their implementation. Two committees chaired by the CSR Department were created in 2017: • The Green Bond Committee, a transversal Committee responsible for validating projects that could be financed by Green Bonds issued by the Group • the vigilance Committee set up to ensure the establishment and monitoring of vigilance plans in the framework of the duty of vigilance law	Cf. ENGIE.com : CSR governance
To support its development plan in renewable energy sources, energy efficiency services, the preservation of natural resources, clean mobility, and R&D in these areas, ENGIE issued four Green Bonds for €2.25 billion in 2021. The total amount issued by ENGIE in Green Bonds reached €14.25 billion at the end of 2021; ENGIE has thus confirmed its leadership and its commitment to playing a leading role in the energy transition while supporting the development of green finance At the end of December 2021, a total of €2.17 billion had been allocated to Eligible Projects in the field of renewable energy sources. When fully operational, these projects should contribute to avoiding greenhouse gas emissions by a minimum of 4.12 million tons of CO2 eq. per year.	Cf. 2021 Universal Registration Document " 5.3 Green Bonds" pages 191 to 200 Cf. 2022 Integrated Report : Green finance at the service of economic performance Cf. ENGIE.com: sustainable finance Cf. ENGIE.com : Contribution of funded projects to sustainable development goals



ENGIE refers to the four principles established by the International Capital Market Association ("Green Bond Principles"), which are: (i) use of proceeds; (ii) existing processes to evaluate and select Eligible Projects; (iii) management of proceeds; and (iv) reporting. The eligibility criteria included in the Green Bond Framework, available on ENGIE's website, were drawn up together with Vigeo Eiris, responsible for issuing an independent opinion.	
In its major investment projects, the Group incorporates 9 extra-financial criteria relating to ethics, CO2 emissions, social impact, human resources, environmental management of ecosystems, consultation with parties stakeholders, local purchasing and health and safety. In addition, the Group takes into account a cost of CO2 for its investments. These criteria are presented, analyzed and assessed for each new investment project above a certain amount..	<u>Cf. 2021 Universal Registration Document 1.5.1</u> <u>CSR Policy</u>

Criterion 2 : COP describes value chain implementation

ENGIE's Purchasing function outlines the principles that apply to managing supplier relations in accordance with the Group's commitments to ethical behaviour and social responsibility, particularly with regard to diversity and disability. Three major ambitions drive this policy: - to contribute to ENGIE's operational performance, - to be a model for creating synergy within the Group - to position itself as an ambassador of the company's values to its suppliers values, by encouraging them to join the UN Global Compact and for preferred suppliers to Global Compact and for preferred suppliers to be aligned or certified by the SBT (Science-based Target) ENGIE's commitments in its relationship with its suppliers are the pursuit of competitiveness and sustainable solutions while ensuring the health and safety of its employees, and in strict compliance with the principles of business ethics. The purchasing charter defines ENGIE's commitments and requirements in the following areas: - Compliance with health and safety rules: suppliers must demonstrate that they meet these requirements - Social responsibility, business ethics, embargoes and the fight against corruption. corruption: commitment of suppliers to ethical business conduct - Sustainable development: ensuring competitive offers and sustainable and innovative solutions Purchasing Governance: Purchasing governance defines the principles governing external spending at group level and sets practical operating rules for the purchasing function. Its objective is also to guarantee the separation of tasks and cooperation between buyers and specifiers in order to obtain the best offer combining price, quality, innovation and sustainability. To facilitate the implementation of the ethical approach, the Code of Conduct for relations with suppliers sets out the Group's seven principles for relations with its suppliers, and the procedures for applying the ethical approach in exchanges and relations with market players.	<u>Cf. ENGIE procurement policy</u> <u>Cf. 2021 Universal Registration Document pages 117-118 " 3.7 Purchasing, Subcontracting and Suppliers"</u> <u>Cf.engie.com : Group's Procurement Charter</u> <u>ENGIE's Code of conduct in suppliers relations : the 7 principles of the relationships with suppliers</u>
Following an assessment campaign started at the end of 2018, ENGIE signed a long term services contract with EcoVadis. This partnership helps the Group to monitor its main suppliers panel in a CSR perspective. In June 2020 the CSR assessment of suppliers was extended to the Major Suppliers of the BUs to cover a panel of around 1,600 existing suppliers in nearly 70 countries and representing a significant portion of expenditure. At the end of May 2022, the overall score of assessed suppliers is 54,7/100 which is good according to EcoVadis' referential. Over 45/100, EcoVadis considers that the supplier is engaged in major CSR topics, therefore risks are limited. The Supplier	<u>Cf.ENGIE.com : sustainable purchasing</u>



embraces continuous performance improvements on CSR and should be considered for a long-term business Relationship . The progress the evaluation is both monitored through EcoVadis' platform and internally by the Group Procurement Department. EcoVadis has developed a methodology for assessing company CSR engagement against 21 CSR criteria and analyses multiple data sources by CSR experts. In addition to a continuous assessment of the Preferred and Major Suppliers, ENGIE manages (with the support of EcoVadis) both a risk mapping per purchasing categories and a country risk assessment to optimize supplier relationship management.	
ENGIE defined in February 2020 19 new objectives for 2030 of which 6 of rank 1 in order to monitor its CSR performance as closely as possible. One of these objectives aims to have 100% of preferential suppliers (excluding energy purchases) aligned or certified SBT (Science-based target) by 2030. At the end of 2021, 20% of these suppliers met this target. Other management objectives are also implemented and concern: the CSR assessment of suppliers, payment terms and inclusive purchasing.	<u>Cf. 2022 Integrated Report : Global value creation</u> <u>Cf. CSR Procurement objectives</u>
An online training programme targeting all of ENGIE's sales teams has been launched to explain what 'responsible purchasing' means, help users find out more about ENGIE's efforts in the field and identify the best way of making a contribution to the Group's commitments. The programme's modules define a range of concepts including sustainable development, corporate social responsibility (CSR) and responsible purchasing, detail the Group's activities in the field and explain how to integrate CSR into every stage of the procurement process, whilst taking account of statements of need, the life-cycle approach and labels. Last but not least, the training programme addresses disability issues and relations with companies from the 'adapted and protected' sector. In 2021, the training plan particularly focused on: - the implementation of the suppliers and subcontractors due diligence policy within the entities; - ethics and supplier relations (over 750 people trained during the year). In addition, employees in the Purchasing function were required to attend online training sessions on ethics on 3 themes: - fraud and corruption, zero tolerance; - our Group, our Ethics - I competition law.	<u>Cf. 2021 Registration Document page 117-118 " 3.7 Purchasing, Subcontracting and Suppliers"</u>
ENGIE has set up a supplier portal that enables innovative SMEs to publicise themselves and get included in ENGIE's supplier pool.	<u>Cf.ENGIE.com</u> : procurement commitments



Implementing the ten principles into strategies and operations :
 Reliable policies and procedures concerning human rights
 Human rights:

- Principle 1 : Businesses should support and respect the protection of internationally proclaimed human rights
- Principle 2 : Businesses should make sure that they are not complicit in human rights abuses

Implementing the ten principles into strategies and operations :
 Reliable policies and procedures concerning human rights
 Human rights:

- Principle 1 : Businesses should support and respect the protection of internationally proclaimed human rights
- Principle 2 : Businesses should make sure that they are not complicit in human rights abuses

Criterion 3 : The COP describes robust commitments, strategies or policies in the area of human rights

The Group's commitment to human rights is shown in its ethical principles. This commitment is presented in the Ethics charter and the Practical guide to ethics. The "Human Rights" referential and policy comprise ENGIE's commitments to respect internationally recognized human rights and specifies the operational processes for analyzing and managing risks so that the Group can be vigilant about the impact of its activities on the human rights of all individuals. The human rights referential was adopted in May 2014. In 2017, the Group redefined its Human Rights referential and policy. The referential and policy are the cornerstones of the human rights component of the Group's vigilance plan which the Group defined in January 2018 and which addresses the provisions of the French law on the duty of vigilance. They complement the Group's existing actions related to the respect for human rights.	Cf.2022 Integrated Report - "A global risk management policy" (p.49) Cf. 2021 Universal Registration Document - "3.8.3 Reference texts" (p.117) Cf. 2021 Universal Registration Document - "3.9 Vigilance plan" (p.119-122) Ethics charter Practical guide to ethics Cf. ENGIE.com – The Group's human rights approach Cf. ENGIE.com - vigilance plan
The Human Rights referential and policy explain the Group's commitments; the first one is to "respect all internationally recognized human rights", as defined by international treaties. They then specify commitments regarding rights of employees and of local communities.	Cf. ENGIE.com – The Group's human rights approach Cf.2022 Integrated Report - "A global risk management policy" (p.49)
The vigilance plan covers all the measures established by ENGIE SA to prevent for its activities and those of its controlled subsidiaries serious violations regarding human	Cf. 2021 Universal Registration Document - "3.9 Vigilance plan" (p.119-122)

rights and fundamental freedoms, the health and safety of individuals and the environment according to its ethical and social responsibility commitments. The Group's adherence to international standards on human rights, including the health and safety of persons and the environment is the foundation of the commitments that the Group intends to apply wherever it operates.	Cf. ENGIE.com – vigilance plan
The Human Rights referential and policy apply to all employees. They also ask Group's business relationships to respect its own commitments, through a contractual provision. In 2018, this clause (ethics and vigilance) was updated and so were the Group's due diligence policies (investment projects, sponsorship, patronage, suppliers and sub-contractors, business consultants), in order to include the challenges related to the duty of vigilance. Since October 2016, an e-learning training module "Business and Human Rights" is available to all Group employees to present them the Group's approach and commitments regarding human rights. It was revised in 2019 to incorporate the new challenges for the Group related to the duty of vigilance and its commercial strategy. In 2019, a new internal in-person training module on the human rights approach at ENGIE (which replaces an in-person training module offered via the association EDH ("companies for human rights") since many years) has been made available. Training videos, including one on human rights and another one on the Group's whistleblowing system which covers all the challenges of vigilance, were made accessible for all the Group's employees in 2018. An automatic reporting system for digital training has been established throughout the Group.	Cf. 2021 Universal Registration Document - "3.9 Vigilance plan" (p.119-122) Cf. ENGIE.com : vigilance plan Cf.2021 Universal Registration Document – "3.8.5 Training" (p 118) Cf. ENGIE.com : The Group's human rights approach Cf. ENGIE.com: The Group's integrity approach Cf. ENGIE.com: Mandatory ethics trainings
The Human Rights referential is public and freely available on the Group's website. It was communicated to all senior executives and to all ethics and compliance officers who are in charge of its distribution and implementation. The Human Rights referential and policy are the result of a broad consultation with operational entities and support functions. They complement specific human rights policies (such as health & safety or responsible procurement) and aim to promote a proactive and global human rights approach. They are based on the United Nations Guiding Principles on business and human rights recommendations. The Group's commitments to respect human rights are based on the mapping of human rights issues which was updated in 2018 as part of the Group's vigilance plan which is presented in the Registration Document and on the public internet site of the Group. The vigilance plan, adopted in 2018 as required by the French law on the duty of vigilance of parent companies and principals, aims to identify and prevent serious risks to people and to the environment. It is based on the Human Rights Referential policies and also generally covers the Group's commitments in terms of human rights, helping their implementation on an operational level.	Cf. 2021 Universal Registration Document - "3.9 Vigilance plan" (p.119-122) Cf. ENGIE.com : The Group's human rights approach Cf. ENGIE.com : vigilance plan



The Group is a founding member of the association EDH ("companies for human rights"). EDH aims to improve integration of human rights into companies' policies and practices, especially by the operational implementation of the UN Guiding Principles.

[Cf. ENGIE.com – references and memberships/](#)

[Cf EDH website](#)

Criterion 4 : La COP describes effective management systems to integrate the human rights principles

The Human Rights referential and policy provide for the implementation of operational processes to ensure effective implementation of the Group's commitments. They ask for a due diligence approach by systematic human rights risks assessment. The vigilance plan is based on the Group's transversal processes, including those in respect of the identification and management of risks specific to each issue or area of vigilance, including risks related to human rights.	<u>Cf.2022 Integrated Report - "A global risk management policy" (p.49)</u> <u>Cf. 2021 Universal Registration Document - "3.8.3 Reference texts" (p.117)</u> <u>Cf. 2021 Universal Registration Document - "3.9 Vigilance plan" (p.119-122)</u> <u>Cf. ENGIE.com : Vigilance plan</u> <u>Cf. ENGIE.com :The Group's human rights approach</u>
Human rights are specifically identified as a Group ethical risk and so are assessed annually. Human rights are also screened in country risk assessments. These risks are presented to the Ethics, Environment and Sustainable Development Committee of ENGIE's Board of Directors. Human rights are incorporated in the analysis of the major capital investment projects, presented in Investment Committee. The vigilance plan, which aims to identify and prevent the risks of negative impacts on people and the environment related to the Group's activities, is based amongst others on the Group's vigilance measures related to human rights. The Group's measures to prevent and manage the major risks in that respect, are specified in the vigilance plan. A report on the effective implementation of the plan is presented annually to the Committee on Ethics, Environment and Sustainable Development of the ENGIE Board of Directors	<u>Cf.2022 Integrated Report - "A global risk management policy" (p.49)</u> <u>Cf.2022 Integrated Report : "Ethics, environment and sustainable development Committee" (p 45)</u> <u>Cf.2021 Universal Registration document -"3.8.2 Risk assessment" (p.116)</u> <u>Cf. 2021 Universal Registration Document - "3.8.3 Reference texts" (p.117)</u> <u>Cf. 2021 Universal Registration Document - "3.9 Vigilance plan" (p.119-122)</u> <u>Cf; ENGIE.com : Ethics compliance referential: "Ethics risks analysis"</u> <u>Cf. ENGIE.com : Due diligence</u> <u>Cf. ENGIE.com : The Group's human rights approach</u> <u>Cf. ENGIE.com : Vigilance plan</u>
At the operational level, annual human rights risks assessments are conducted by entities and reported through the global risk-management (ERM) system. New projects of the entities are also evaluated according to human rights criteria. An in-depth analysis is required for "at risk" countries. Methodological tools customized to the Group's activities accompany the Human Rights referential and policy. In the form of checklists, they aim to support managers for the risks analysis required. These tools are deployed since 2014 and are regularly updated. In 2018, questions relating to risk factors (such as country, type of workforce, presence of	<u>Cf.2022 Integrated Report - "A global risk management policy" (p.49)</u> <u>Cf. 2021 Universal Registration Document - "3.8.3 Reference texts" (p.117)</u> <u>Cf. 2021 Universal Registration Document - "3.9 Vigilance plan" (p.119-122)</u>

vulnerable populations) were added as part of the annual review of the Group's "human rights infringement" risk. This strengthening of the annual risk review process allows entities to better identify their own specific risks and target actions to control and monitor risks. Since 2018, the ethical due diligence of new partners before any investment project incorporates human rights.	Cf. ENGIE.com : Ethics compliance referential: "Ethics risks analysis" Cf. ENGIE.com : Human rights referential Cf. ENGIE.com : Vigilance plan
The Human Rights Referential provides explicitly the integration in contracts of the requirement for suppliers, service providers, subcontractors and partners to respect the Group Human Rights commitments. The clause through which the Group asks all its business relationships (suppliers, contractors and partners) to respect its own commitments to, amongst others, respect human rights, was updated early 2018 to include special "duty of vigilance" provisions applicable to the Group's affected suppliers and subcontractors in accordance with the French law on the duty of vigilance requirements. This commitment completes existing actions of a responsible purchasing policy, in particular the Code of conduct in supplier relations (integration of ethical criteria in procurement processes, ethics, health and safety, social & environmental responsibility clause in the general conditions of purchase, whistleblowing) and the training for the actors in the Purchasing function. In 2019, a new policy on supplier due diligence was rolled out. All of the Group's preferred suppliers are assessed on their CSR practices, including human rights.	Cf. ENGIE.com : procurement policy Cf. ENGIE.com : Integrity referential Cf.2022 Integrated Report - "A global risk management policy" (p.49) Cf.2021 Universal Registration Document : "3.7 Purchasing, subcontracting and Suppliers"(p 115) Cf.2021 Universal Registration Document – "3.8.5 Training" (p 118) Cf. 2021 Universal Registration Document - "3.9 Vigilance plan" (p.119-122) Cf. ENGIE.com : The Group's human rights approach Cf. ENGIE.com : Vigilance plan Cf. ENGIE.com : Mandatory ethics training
Training on human rights is available for all employees, amongst which an e-learning on human rights which has been available to all Group employees since October 2016, updated in 2019. In 2019, a new internal in-person training module on the human rights approach at ENGIE (which replaces an in-person training module offered via the association EDH ("companies for human rights") since many years) has been made available. Training videos, including one on human rights and another one on the Group's whistleblowing system which covers all the challenges of vigilance, were made accessible for all the Group's employees in 2018. An automatic reporting system for digital training has been established throughout the Group.	Cf.2021 Universal Registration Document – "3.8.5 Training" (p 118) Cf. ENGIE.com : Mandatory ethics trainings
The Human Rights referential and policy are fully integrated into the Group Ethics approach, overseen at the highest corporate level by the Ethics, Environment and Sustainable Development Committee of ENGIE's Board of Directors.	Cf.2022 Integrated Report - "A global risk management policy" (p.49)



Within the General Secretariat, the Ethics, Compliance & Privacy Department coordinates the implementation, with the support of a global network of more than 230 ethics and compliance officers. Managers and ethics and compliance officers must ensure that the conditions for its implementation in their entities are met. Fully linked to the company's ethics organization, the vigilance plan, which is based amongst others on the Group's vigilance measures related to human rights, benefits from governance, monitoring mechanisms, resources and associated actors, and is supervised at the highest level of the Group. Its management has been entrusted by the Group's Executive Committee to the Ethics, Compliance & Privacy Department. A report on the effective implementation of the plan is presented annually to the Committee on Ethics, Environment and Sustainable Development of the Board of Directors To ensure that the vigilance plan is implemented and to coordinate the various steps involved, a specific inter-directional committee was set up by the Group. It is in particular responsible for ensuring that the plan is properly disseminated, that the various measures are coordinated, that the entities are made aware of it and for facilitating the feedback of information for the Group's reporting requirements. In 2018 the Group entities were asked to contribute, at their level and within their direct and indirect subsidiaries, to the ownership, dissemination and implementation of the vigilance plan. The monitoring of these actions by the entities is included in the annual compliance report.	<u>Cf. 2021 Universal Registration Document - "3.8.1 Ethics and compliance governance" (p.116)</u> <u>Cf. 2021 Universal Registration Document - "3.9 Vigilance plan" (p.119-122)</u> <u>Cf. ENGIE.com :ethics compliance referential: " main parties involved in ethics compliance"</u> <u>Cf. ENGIE.com : The Group's human rights approach</u> <u>Cf. ENGIE.com : Vigilance plan</u>
--	--

Criterion 5 : The COP describes effective monitoring and evaluation mechanisms of human rights integration.

The monitoring of the Human Rights referential and policy is included in the ethics & compliance processes of the Group : internal control system, audits, etc. Specific checkpoints relating to the deployment and implementation of the Human Rights referential and policy are integrated in the Group's internal control system since 2014. At the end of 2019, the internal control framework relating to the human rights policy was reinforced and control points were created to monitor the Group's vigilance plan. To ensure that the vigilance plan is implemented and to coordinate the various steps involved (including those relating to vigilance in regard of human rights), a specific inter-directional committee was set up by the Group in 2017. It is in particular responsible for ensuring that the plan is properly disseminated, that the various measures are coordinated, that the entities are made aware of it and for facilitating the feedback of information for the Group's reporting requirements.	Cf.2022 Integrated Report - "A global risk management policy" (p.49) Cf.2021 Universal Registration Document - "3.8.6. Controls and certifications" (p.118) Cf. 2021 Universal Registration Document - "3.9 Vigilance plan" (p.119-122) Cf. ENGIE.com : Control system Cf. ENGIE.com : The Group's human rights approach Cf. ENGIE.com : Vigilance plan
The Human Rights referential and policy as well as the Group's vigilance plan which is based amongst others on the Group's vigilance measures related to human rights, fall within the scope of the annual compliance procedure (procedure that relies on the dedicated Group digital tool "My Ethics Report") : the ethics and compliance officers prepare a report on the progress made by their respective entities in regard of their ethics organization, which they submit, together with a compliance letter from the entity's CEO addressed to the upper level entity CEO, to the ethics and compliance officer of the upper level entity. Based on these reports, the ENGIE annual compliance report is prepared and presented to the Ethics, Environment and Sustainable Development Committee of ENGIE's Board of Directors. Since 2015 indicators on the implementation of this referential and policy have been integrated in the annual compliance report. These indicators were strengthened in 2019. In 2018 the Group entities were asked to contribute, at their level and within their direct and indirect subsidiaries, to the ownership, dissemination and implementation of the vigilance plan. The monitoring of these actions by the entities is included in the annual compliance report.	Cf. 2021 Universal Registration Document - "3.9 Vigilance plan" (p.119-122) Cf. ENGIE.com : Control system Cf. ENGIE.com : The Group's human rights approach Cf. ENGIE.com : Vigilance plan
ENGIE's compliance process imposes an obligation on all Group entities to report any suspicion of an ethics incident as soon as they become aware of it. This internal ethics incidents reporting procedure (which relies on the dedicated Group digital tool "My Ethics Incident") includes explicitly human rights incidents. In 2021, 277 managerial reports of ethics incidents were submitted, of which 48% pertained to the social responsibility and human rights domain.	Cf.2022 Integrated Report - "A global risk management policy" (p.49) Cf.2021 Universal Registration Document - "3.8.4. Whistleblowing and reporting of ethics incidents" (p.118) Cf. ENGIE.com: Group Codes of Conduct Cf. ENGIE.com : Ethical compliance system



ENGIE maintains constant and proactive dialogue with its stakeholders, through dedicated operational mechanisms for dialogue and consultation and by its participation to voluntary initiatives. The vigilance plan and its operational implementation are presented annually to employee representative bodies via the existing committees: the European Works Council, and the Committee on Ethics, the Environment and Sustainable Development, for the Board of Directors. The entities must present the vigilance plan and the obligations arising from the French law on the duty of vigilance to their employee representative organizations. To prevent and manage as effectively as possible the impacts of its activities, amongst others in the field of human rights, the Group has adopted a specific policy on "dialogue with stakeholders", a component of the Group's CSR policy.	<u>Cf. 2021 Universal Registration Document - "3.9 Vigilance plan" (p.119-122)</u> <u>Cf. ENGIE.com : The Group's human rights approach</u> <u>Cf. ENGIE.com : vigilance plan</u> <u>Cf. ENGIE.com : Stakeholder engagement</u>
Operational grievance mechanisms are implemented and are available for anyone who feels affected by the activities of the Group. At the Group level, the Group's whistleblowing system is open to all employees and to all external stakeholders and covers all the challenges of vigilance (linked to the Group's ethical commitments). For issues of a commercial nature, stakeholders have access to the Mediator of the Group. In 2017 the Group set a new policy on whistleblowers that incorporates the French legal requirements of the Sapin 2 law and the duty of vigilance law. Within the framework of this policy which has been implemented gradually since 2018 in view of its Group-wide deployment in 2019, an alert can be issued, anonymously or not, via email or by phone. It is received by an external service provider that transmits the report in anonymized form to ENGIE for processing. In 2021, 187 alerts, 29% of which pertained to the social responsibility and human rights domain, were made in the framework of the ENGIE whistleblowing system.	<u>Cf.2021 Universal Registration Document - "3.8.4. Whistleblowing and reporting of ethics incidents" (p.118)</u> <u>Cf. 2021 Universal Registration Document - "3.9 Vigilance plan" (p.119-122)</u> <u>Cf. ENGIE.com : Whistleblowing system</u> <u>Cf. ENGIE.com : The Group's human rights approach</u> <u>Cf. ENGIE.com : Vigilance plan</u> <u>Cf.2022 Integrated Report - "A global risk management policy" (p.49)</u> <u>Cf. ENGIE.com : Ethical compliance system</u>



Implementing the ten principles into strategies and operations : Reliable policies and procedures concerning labour standards

Labour :

- Principle 3 : Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining
- Principle 4 : Businesses should uphold the elimination of all forms of forced and compulsory labour
- Principle 5 : Businesses should uphold the effective abolition of child labour
- Principle 6 : Businesses should uphold the elimination of discrimination in respect of employment and occupation

Criterion 6 : The COP describes robust commitments, strategies or policies in the area of labour

In line with its commitments, ENGIE opened negotiations with the international union federations toward a worldwide agreement on fundamental rights and social responsibility. It was signed in January 2022 with the three global union federations most representative of our business lines, and with the four representative labor organizations at the Group level.

This agreement reaffirms ENGIE's intention to be recognized as a responsible employer that intends to attain a level of excellence socially that is commensurate with its environmental standards

Under this agreement, ENGIE and its subsidiaries are reaffirming their commitment to comply with internationally recognized standards for human, labour and trade union rights in all their activities.

ENGIE hereby confirms its commitment to comply with:

- The UN Guiding Principles on Business and Human Rights.
- The Universal Declaration of Human Rights.
- The OECD Guidelines for Multinational Enterprises.
- The ILO Tripartite Declaration of Principles relating to Multinational Enterprises and Social Policy.
- The UN Global Compact.

Engie is committed to fully respecting and implementing the Fundamental Conventions of the International Labour Organisation (ILO), even in countries that have not ratified these conventions, in particular those:

- Guaranteeing freedom of association and the principles of collective bargaining:
 - Convention 87, concerning freedom of association and protection of the right to organise (1948)
 - Convention 98, concerning the application of the principles of the right to organise and collective bargaining (1949)
- Abolishing the use of forced or compulsory labour
 - Convention 29, concerning forced or compulsory labour (1930)
 - Convention 105, concerning the abolition of forced labour (1957)
- Prohibiting child labour and exploitation

[Cf.Engie.com : "A modern and comprehensive social agreement"](#)

[Cf. Engie.com : Global Framework Agreement on Fundamental Rights and ENGIE's Social Responsibility](#)

• Convention 138, concerning the minimum age for admission to employment (1973) • Convention 182, concerning the prohibition and immediate action for the elimination of the worst forms of child labour (1999) - Protecting workers • Convention 102 concerning minimum standards of social security (1952) • Convention 155, concerning occupational health and safety and the working environment (1981) • Convention 167, concerning safety and health in construction (1988) - Combating discrimination • Convention 100, concerning equal remuneration for men and women workers for work of equal value (1951) • Convention 111, concerning discrimination in respect of employment and occupation (1958) • Convention 135, concerning the protection of workers' representatives in the company and the facilities to be granted to them (1971) • Convention 156, concerning equality of opportunity and treatment for men and women workers: workers with family responsibilities (1981) • Convention 190, on violence and harassment (2019)	
In May 2014, the Group signed a global health and safety agreement that extends and strengthens the commitments it made at European level in 2010. The agreement expressly provides for close partnerships to be formed with suppliers and subcontractors so that they will guarantee the same level of health and safety as that afforded to Group employees.	
The Group's health and safety policy is drawn up with input from managers and employees and is based on a Group agreement with the trade union federations. It aims to safeguard the integrity of people (be they employees, service providers or third parties) and goods and promote quality of life at work. It is supplemented by the Group Rules on Health and Safety, which set down requirements applying to all entities and by a multi-year action plan. The new 2021-2025 action plan takes up the Group's four major health and safety issues: - leadership - anticipation - integration - acculturation	Agreements and fundamental principles of the Health and Safety Policy Cf. 2022 Integrated Report : "Staying tough on safety" Cf. 2021 Universal Registration Document : 3.4.8.2.3 Definition of the new 2021-2025 action plan
The Group is committed to two indicators by 2030: - a frequency rate of accidents with lost time of Group employees and subcontractor employees on closed sites ≤ 2.3 Results 2021 : 2,9 : the economic recovery in 2021 has statistically generated greater risk exposure- the prevention rate, an indicator on the identification and anticipation of risks, thus promoting prevention. The goal is to have a prevention rate ≥ 0.75 by 2030. • Results 2021 : 0,58	Cf. 2021 Universal Registration Document page 21 : « Achievement of CSR targets by 2030 »
At the start of the crisis of COVID-19, the Group set up a dedicated communications system to support the roll out of the various personal protection measures. The measures defined and implemented in early 2020 were continued in 2021. The Group	Cf. ENGIE.com : COVID-19 Mobilization

enlisted a service provider specialized in managing health risks to help guide its decision making. Measures to prevent the infection of employees, subcontractors and customers were applied which took into account the contamination level of countries and the prevention systems set up locally by the authorities. The system put in place was part of a continuous improvement cycle. Feedback from entities expressing their needs and sharing any difficulties helped adapt the prevention system. To respond to the urgency of the health crisis and to improve the protection of its employees, the employees, the Group deployed the first two pillars of its global social protection program in April 2020 of its global social protection program: ENGIE Care.	Cf. 2021 Integrated report page 47 : " ENGIE Care" Cf. 2021 Universal Registration Document page 100 « 3.4.5.2 Social protection and pensions »
The Group is engaged in the fight against discrimination. He is a signatory to the ILO Global Business and Disability Charter in 2016, the Other Circle LGBT Engagement Charter in 2017 and the European Embrace Difference manifesto alongside 50 other major groups. as part of its participation in ERT (European Round Table of Industrialists). ENGIE has adhered to the United Nations Women Empowerment Principles ENGIE published the practical guide "LGBT+, understanding to act together" in order to raise awareness of the question of LGBT+ in the workplace. In 2021, ENGIE stepped up its actions to boost diversity and combat discrimination, with: • the launch of "Friends," the Group's network of LGBT+ and Straight Allies employees; • the worldwide publication of a new guide, "Understand each other to better act together"; • the training of 150 HR staff in France; • the provision of a training/awareness-raising catalog for management committees, managers, employee representative bodies and all employees; • participation for the second time in the "Role Models" of L'Autre Cercle, with two candidates presented. ENGIE was rewarded by the four-year renewal of its Diversity label in October 2017 for all Group activities in France.	Cf. 2021 Universal Registration Document page 91 : « 3.4.4.2.4 LGBT+ (Lesbian, Gay, Bisexual, Transgender/Transsexual plus) » p 99 Cf. Global Business and Disability Charter Cf. l'autre cercle LGBT Charter Cf. European manifesto « Embrace difference »
Engie works to promote diversity of business by raising awareness: "I learn Energy", "Elles bougent", "Girls and Boys day day. ENGIE is also tapping in the SME ecosystem to help increase the number of women in so-called "male professions" and the number of men in so-called "female professions". ENGIE has launched and is rolling out the Fifty-Fifty program to create the conditions needed to achieve gender equality. It is based on six pillars: structuring and governance, diagnostics, awareness and communication, organizational adaptation, employee development and external partnerships. In 2021, each entity benefited from a "Fifty-Fifty toolbox," tailored to the occupations and cultural environments of each region.	« J'apprends l'énergie » « Elles bougent » Cf. 2021 Universal Registration Document pages 97-98 "3.4.4.1 Gender diversity "



In 2021, women made up 21.8% of the Group's workforce. The proportion of women in management was 24.6%. The proportion of women on the Operational Committee is 27.3% (15 women and 40 men) in 2021. The proportion of women on the Group Executive Committee is 27.3% (three women and eight men). The gender pay and professional equity index, which stands at 89 for France and 82 outside France, is increasing for France and outside France. The results reflect a reduction in pay gaps to be pursued within the framework of the action plan linked to this objective.	<u>Cf. 2021 Universal Registration Document :</u> <u>3.4.4.1.2 Professional and pay equity pages 98-99</u>
In 2019, the Group strengthened its commitment to youth employment by joining the global initiative Global Alliance For YOUth. The ambition of this expanded initiative is to impact 6 million young people under 30 by 2022 to help them develop their future employability. ENGIE has set a goal of receiving 10% of work-study students in France under 3 years and in Europe under 5 years. At the end of 2021, ENGIE had 6,327 apprentices, i.e. 7.4% of the workforce in France.	<u>Global alliance for YOUth</u> <u>Cf. 2021 Universal Registration Document page 87 : "3.4.4.2.1 The social and professional inclusion of young people "</u>
ENGIE has set up a scheme for forward-looking management of jobs and competencies, which is geared towards adjusting recruitment and helping employees to adapt to the company's future needs. It has set up the "ENGIE Skills" program which develops synergies between the Group's initiatives: the HR aspect of the medium-term action plan, the professional observatory, and the careers of tomorrow. Since 2017, five priority actions were launched: - Accelerate the shift towards future-oriented activities - Organize the internal transfer of skills - Create a technical network - Organize the management of external skills - Fostering an entrepreneurial spirit among employees In 2018, an analysis of major trends and issues in terms of skills was conducted and an educational and operational action plan was conducted. In 2019, 69.2% of the Group's workforce took a training course, thus respecting the target of 2/3 of all employees to take a course. More than 7,900 transfers took place in 2019 and the Group hired over 37,000 new employees worldwide. In 2021, 81.9% of the Group's workforce took a training course.	<u>Cf. 2021 Universal Registration Document page 93 " 3.4.2.2.1 ENGIE Skills, the jobs and expertise advance management system "</u>

Criterion 7 : The COP describes effective management systems to integrate the labour principles

Social dialogue is held at three levels within the Group – global, European and French (almost 50% of the workforce being based in France) – and in each of the subsidiaries through representative and negotiating bodies. The social dialogue system is based on regular meetings with representatives of international trade union federations, a European Works Council and a Group Committee for France. • Engie signed a European agreement in April 2016 to support the implementation of its enterprise project. This agreement aims at strengthening professional excellence and develop the employability of its employees. • ENGIE signed in November 2017 a new European agreement on professional gender equality. This agreement for an indefinite term reaffirms that the promotion of equal opportunity, equal treatment and diversity of employees is an absolute priority for the Group. • In January 2022, ENGIE signed a global agreement on fundamental rights and social responsibility with the three global trade union federations most representative of our businesses as well as with the four representative trade union organizations at Group level.	<u>Cf. 2021 Registration Document page 101 « 3.4.6 Social dialogue »</u> <u>Cf.ENGIE.com : A modern and comprehensive social agreement</u>
The Group has defined a set of human resources development policies designed to attract, retain and develop all of the Group's employees, who constitute a key strategic asset. In 2017, ENGIE rolled out a new HR system to adapt skills to the Group's current and future challenges, with the aim of accelerating the shift towards growth-oriented activities and organizing the internal transfer of skills, promoting mobility and giving employees the opportunity to develop within the Group, and creating a network conducive to transferring and sharing skills. This system revolves around ENGIE skills and ENGIE Mobility. The ENGIE Boost initiative, launched in 2018, aims to identify, develop, motivate, and retain High Potential talent at all levels of the organization, in order to prepare them for the Group's most strategic roles.	<u>Cf. 2021 Universal Registration Document pages 92-94 "3.4.3 Human resources development and mobility policies"</u>
The Group has a proactive policy to combat discrimination and promote equal opportunity and equal opportunities and equal treatment. In terms of gender diversity, ENGIE has deployed the "fifty-fifty" project, which aims to create the conditions necessary to achieve managerial parity. A roadmap has been defined in order to attract the best talents and make ENGIE a reference in this field. It is based on six pillars: structuring and governance, diagnosis, awareness and communication, adaptation of the organization, development, and external partnerships.	<u>Cf.2021 Universal Registration Document pages 97-98 "3.4.4 Diversity and inclusion"</u> <u>Cf. ENGIE.com : Ambitious goals for professional equality and gender diversity</u>
Each of ENGIE's entities in France implements the Group's disability policy, whilst taking account of specific operational and local characteristics. At present, 11 collective agreements approved by the Regional Directorates for Businesses, Competition, Consumption, Labour and Employment cover some 95% of the Group's employees in France. The Group signed on the France perimeter a new agreement 2018-2020 aiming to: - to promote the recruitment of people with disabilities - to accompany and propose the necessary adjustments	<u>Cf. 2021 Universal Registration Document page 99 : "3.4.4.2.2 Employees with disabilities"</u> <u>Cf ILO Global Business and Disability Charter</u>



- to support changes in career paths - to develop purchases in the protected and adapted sector At the end of 2021, the Group in France had an employment rate of 3.4%	
ENGIE is actively involved in a number of projects that use sport as a driver and vector for social and professional inclusion.	<u>Cf. 2021 Universal Registration Document page 99: "3.4.4.2 Inclusion and job-seeking support"</u>



Criterion 8 : The COP describes effective monitoring and evaluation mechanisms of labour principles integration

Implementation of the Group's health and safety principles and requirements is monitored by means of internal inspections and audits, which are conducted by the Group Health and Safety Division. Health and safety management reviews are carried out at all levels. These take stock of the current situation and set out pathways for enhancing the management system's efficiency. The health and safety results are monitored by the EXCOM, the Board of Directors and the EESDC and points are presented to the ENGIE OPCOM.	<u>Cf. 2021 Universal Registration Document pages 103-104 : "3.4.8.2 The health and safety management system"</u>
ENGIE monitors its social responsibility efforts using a mechanism based on a number of quantified indicators, which are mentioned in its social reports, among other places. These help the Group to continuously improve its performance.	<u>Cf. ENGIE.com : Note on the methodology of social indicators</u> <u>Cf. ENGIE.com : Social Reporting</u>
ENGIE has adopted a social reporting method that has been checked against the AA1000 standards by its statutory auditors.	<u>Cf ENGIE.com : Statutory auditors certification on CSR information published</u> <u>Cf. ENGIE.com : Statutory auditors reasonable assurance on a selection of CSR information</u>
The Group has renewed in October 2017 for a four-year period the diversity label . This award recognized and highlighted ENGIE's commitments and actions to prevent discrimination, promote equal opportunities and foster diversity.	

Implementing the ten principles into strategies and operations : Reliable policies and procedures concerning environment protection

Environment :

- Principle 7 : Businesses should support a precautionary approach to environmental challenges
- Principle 8 : Businesses should undertake initiatives to promote greater environmental responsibility
- Principle 9 : Businesses should encourage the development and diffusion of environmentally friendly technologies

Criterion 9 : The COP describes robust commitments, strategies or policies in the area of environmental stewardship.

When developing its operational activities, ENGIE refers to and complies with the main international standards and agreements on protecting biodiversity, including: • the Convention on Biological Diversity • the Millennium Development Goals • the United Nations Framework Convention on Climate Change.	
In June 2022, ENGIE has updated its CSR, environmental and societal policies.	Cf. ENGIE.com : CSR policy Cf. ENGIE.com : environmental policy Cf. ENGIE.com : Stakeholder engagement
The Group is committed to phasing out power generation from coal and aims to move its portfolio of power generation assets to a 2 ° C trajectory compatible with the Paris Agreement. It has received certification from the Science Based Target (SBT) initiative. In terms of environment, the Group has set itself 4 new tier 1 objectives for 2030: - GHG emissions linked to energy production (scope 1 and 3), in line with the SBT trajectory, i.e. 43 Mt CO₂ eq in 2030 • 2021 results : 67 Mt CO₂ eq - GHG emissions linked to the use of products sold, in line with the SBT trajectory, i.e. 52 Mt in 2030 • 2021 results : 66 Mt CO₂ eq - Contribution to the decarbonization of our customers : 45 Mt CO₂ eq avoided through the use of ENGIE products and services • 2021 results : 28 Mt CO₂ eq - 100% of our preferred suppliers (excluding energy purchases) certified or aligned by the Science Based Targets initiative • 2021 results : 20%	Cf. 2022 Integrated Report : A global value creation
In May 2021, the Group committed to achieving Net Zero Carbon in all three of its emission scopes emissions by 2045. It also announced its coal phase-out plan, scheduled for 2025 in Europe and 2027 for the rest of the world. In May 2021, ENGIE made a dual commitment to biodiversity in both Act4nature International and Entreprises Engagées pour la Nature-Act4nature France. These two initiatives share the same ten common commitments and each invites signatory companies to add individual commitments. This new step allows ENGIE to broaden its commitment by defining a new 2020-2030 roadmap with objectives that apply to all of its activities in France and abroad with milestones in 2025.	Cf. 2022 Integrated Report page 23 Cf. ENGIE.com Biodiversity Policy : Objectives and commitments Cf. ENGIE.com : Protecting biodiversity is a priority for the Group's businesses and projects. Cf. Act4nature : ENGIE's commitments



ENGIE's individual commitments are as follows: - Avoid Reduce Compensate: 100% of the files submitted to the Group CDE (Engagement Committee) in 2022 - Nature-based solutions: 10 projects identified that comply with the IUCN standard by 2022 - Ecological site management: 50% of sites by 2025 - Priority sites for biodiversity: 50% sites with an action plan with relevant stakeholders by 2025 - Supply chain: Analysis of at least 2 activities per year by 2025 - Awareness - Sharing: 2 modules/year by 2025; at least in 2022 2023: 3000 employees / year	2022 Biodiversity Notebook
ENGIE has drawn up a water management policy that is in step with the core elements identified by the CEO Water Mandate, an initiative that the Group has endorsed since its launch. Every year, ENGIE submits a progress report to the CEO Water Mandate.	Cf. ENGIE.com : Water policy Cf. CEO Water Mandate COP 2021
ENGIE places air pollution issues at the very heart of its strategies. The Group has taken a wide range of actions to cut emissions of pollutants such as SO₂, NO_x and particulate matter.	Cf. 2021 Universal Registration Document page 112-113 "3.5.4.7 : Atmospheric pollutants »
The ENGIE Group's Purchasing function has defined an ambition, one of the axes of which is to contribute to the CSR approach and to the carbon neutrality of the Group. This is materialized in its sustainable purchasing policy and in its three following objectives for 2030: - To have 100% of its 250 Preferred Suppliers aligned or certified SBT - To have 100% of its preferred and major suppliers with an ECOVADIS score above the "CSR risk controlled" level - To have 100% of its inclusive purchases aligned with WG3 recommendations	Cf.2021 Universal Registration Document page 117-118 : «3.7 Purchasing, Subcontracting and Suppliers » Cf. ENGIE.com : Sustainable procurement
In October 2017, ENGIE supported these recommendations with the climate leaders of the WEF (World Economic Forum) at the G20, and set up an internal cross-functional working group which defined a plan for implementation of the recommendations. A partnership with the IPSL (Institute Pierre Simon Laplace) was established, aiming to identify the nature of the meteorological data likely to impact its facilities and to define the evolution curves for this data.	Cf. 2021 Universal Registration Document pages 73-74 : 3.1.3 Climate trajectory (related to the recommendations of the TCFD: Task Force on Climate-related Financial Disclosures Cf.2022 Climate report TCFD report

Criterion 10 : The COP describes effective management systems to integrate the environmental principles

The Corporate Social Responsibility (CSR) Department relies on a network of designated coordinators in the business units (GBU, GEMS and Nuclear) and geographical entities (national and regional Hubs). To engage employees as widely as possible on these subjects, the CSR Department also uses an internal network of global CSR ambassadors. The CSR Department provides regular presentations to the Board of Directors' Ethics, Environment and Sustainable Development Committee (EESDC) on the latest CSR topics (science-based targets, task force on climate-related financial disclosures, tracking CSR objectives and commitments, discussions with civil society) and an annual report (CSR ratings, CSR objectives, the environmental and societal actions of the Group). The CSR Department coordinates several committees : - the Green Financing Committee, in charge of overseeing projects likely to be financed by green bonds regularly issued on the market by the Group. - the SBT Committee, in charge of overseeing the decarbonization commitments, particularly those made as part of the science-based targets initiative - the Adaptation & TCFD Committee, in charge of overseeing the achievement of financial transparency commitments made in the TCFD initiative (Task Force on Climate related Financial Disclosures) and to monitor the Group's plans to adapt its assets to climate change. - the Duty of Vigilance Committee, in charge of overseeing measures to prevent serious violations relating to human rights and fundamental freedoms, the health and safety of individuals and the environment that might arise from the activities of the Group and the subsidiaries it controls	CSR Policy Environmental Policy Cf 2021 Universal Registration Document page 72 : 3.1.1 CSR policy and governance
To monitor the implementation of its environmental policy, manage environmental risks and enhance communication on environmental performance to stakeholders, the Group has developed a reporting system that goes above and beyond the requirements laid down by French law and draws on work carried out within dialogue bodies including the Global Reporting Initiative (GRI) and the World Business Council for Sustainable Development (WBCSD). Its environmental reporting has been checked against the AA1000 standards by its statutory auditors.	Cf. ENGIE.com : Note on the methodology of environmental indicators Cf. ENGIE.com : environmental reporting
The Group has mapped the environmental and health risks it may encounter . based on its materiality matrix.	Cf. 2021 Universal Registration Document pages 79-89 « 3.3 Analysis of main CSR risks and challenges Cf. 2021 Universal Registration Document pages 84-85 « 3.3.1 Main environmental risks »
As part of its vigilance plan, the Group has implemented the monitoring of action plans for sites presenting a potential environmental risk.	Cf. 2021 Universal Registration Document pages 121-122 : "3.9.1 Identification and management of the risks of serious harm to individuals and the environment "

Criterion 11 : The COP describes effective monitoring and evaluation mechanisms for environmental stewardship

ENGIE monitors its environmental responsibility efforts using a mechanism based on a number of quantified indicators, which are mentioned in its environmental reports, among other places. These help the Group to continuously improve its performance.	Cf. ENGIE.com : environmental reporting
ENGIE has adopted an environmental reporting method that has been checked against the AA1000 standards by its statutory auditors.	Cf.ENGIE.com : Methodology on the environmental indicators Cf ENGIE.com : Statutory auditors certification on CSR information published Cf. ENGIE.com : Statutory auditors reasonable assurance on a selection of CSR information
The Group submits an environmental report to the Executive Committee and the Board of Directors' Ethics, Environment and Sustainable Development Committee every year.	Cf. 2022 Integrated Report page 47 : Ethics, Environment and Sustainable Development Committee Cf.2021 Universal Registration Document page 159 : «4.1.2.4.4 The Ethics, Environment and Sustainable Development Committee»
Complaints and convictions related to environmental or health damage amounted to 13 and 2 respectively in 2021, resulting in compensation of 697k€. In 2021, environmental expenses (investments and current operating expenses related to environmental preservation) amounted to related to the preservation of the environment) amount to more than €633 millions.	Cf. 2021 Universal Registration Document - "3.5.4.9. Managing risk and environmental complaints" (p.113)
ENGIE fills out the CDP's questionnaire every year. In 2021, the Group scored A- for CDP Climate and for CDP Water and B- for CDP Forest.	Cf. CDP website



Implementing the ten principles into strategies and operations : Reliable policies and procedures concerning the fight against corruption

Anti-corruption :

- Principle 10 : Businesses should work against corruption in all its forms, including extortion and bribery.

Criterion 12 : The COP describes robust commitments, strategies or policies in the area of anti-corruption

ENGIE's ethical goal is to act, in all circumstances, in accordance with the Group's values and commitments and in compliance with laws and regulations. In terms of prevention of corruption, the ENGIE's ethics policy aims to develop an integrity culture and an ethics practice based on 4 principles, among which "Behave honestly and promote a culture of integrity". To support Group employees and entities in the strengthening of this culture of integrity, the ENGIE Ethics charter defines the 4 Group ethics principles, ENGIE's Practical guide to ethics forbids corruption in all its forms, and the Integrity Referential specifies the Group organization to manage the risks of integrity breaches and sets out the action plan for the prevention of fraud and corruption. ENGIE has reiterated its commitment to ethics by signing, in 2011, the global agreement on fundamental rights, social dialogue and sustainable development which applies to all the Group's entities and reaffirms its culture of integrity, trust and honesty and the principle of zero tolerance towards fraud and corruption within the Group and in respect of external parties. This global agreement, including the Group's commitment to the prevention of and the fight against corruption in all its forms, has been renewed in 2022. The zero tolerance message has been reiterated by the ENGIE CEO and by the ENGIE Chairman on several occasions (e.g. on the occasion of the publication of the 2022 Integrated Report): "Guided by our purpose, our strategy – which places our performance within a comprehensive CSR approach – contributes to the Sustainable Development Goals of the United Nations. Therefore, we are fully reaffirming our historic adherence to the 10 Principles of the United Nations Global Pact."	Reporting on the 10th principle against corruption: " 1 Commitment and policy" B1-B + D1-D5 (p 7-13) Cf.2020 Integrated Report - "Ethics and compliance" (p.42) Cf. 2021 Universal Registration Document - "3.8. Ethics and compliance" (p.116) Cf. 2021 Universal Registration Document - "3.8.3 Reference texts" (p 117) Cf. ENGIE.com : Integrity referential Cf. ENGIE.com: Principles and Commitments ENGIE Ethics charter Cf. 2022 Integrated Report – Joint Editorial (p. 2)
In the framework of its anti-corruption program, the Group has implemented specific policies (including updated versions or newly issued versions in 2018 and in 2019 to address in particular the requirements of the French Sapin II law and the French law on the duty of vigilance) relating to: - Due diligence: the Group has adopted several ethical due diligence policies regarding: - Business consultants - Investment project partners - Recipients of corporate sponsorship and patronage - Suppliers and direct sub-contractors - Newly recruited persons in positions most exposed to corruption risks (new policy since end 2021)	Cf.2020 Integrated Report - "Ethics and compliance" (p.42) Cf. 2021 Universal Registration Document - "3.8.3 Reference texts" (p 117) Cf. ENGIE.com : Integrity referential Cf. ENGIE.com : The Group's integrity approach

- Gifts and hospitality (procedure overhauled in 2020 and supported by a new Group digital gifts & hospitality register deployed in 2021) - The prevention of conflicts of interests - Lobbying - The integration of an ethical, health & safety, social & environmental responsibility clause in contracts with suppliers, service providers, subcontractors and partners of the Group (including, since 2021, with regard to the content of this clause in ENGIE's General Terms and Conditions of Purchase, the inclusion of the requirement for an external assessment of the supplier's performance regarding environment, ethics, human rights and sustainable purchasing) ENGIE developed its own internal capacity to carry out ethics due diligence; since 2018, the internal due diligence department plays a central role in the Group's due diligence procedures. With regard to interest representation, the Group has set up a reporting procedure so that all of the entities concerned can comply with their legal obligations, particularly with regard to the reporting obligation to France's High Authority for Transparency in Public Life, pursuant to the French Sapin II law.	
The Group requires its suppliers to acquaint themselves with and support, its commitment regarding ethics and sustainable development as stipulated in the <u>Ethics charter</u>, the <u>Practical guide to Ethics</u>, the <u>procurement policy</u> and <u>the code of conduct in supplier relations</u>, all published on its website.	<u>Cf. ENGIE.com : Procurement</u> <u>Cf. ENGIE.com : Integrity referential</u> <u>Cf. ENGIE.com : Codes of conduct</u>



Criterion 13 : The COP describes effective management systems to integrate the anti-corruption principle

The Group has implemented a scheme to fight against corruption which comes as follows:	Reporting on the 10th principle against corruption "2. Implementation" B3-B6 + D6-D11 (p 14-21)
<u>Risk assessment</u> An assessment of ethical risks that takes into account the specific characteristics of the Group's activities is integrated into the annual ENGIE's risk analysis process (ERM). The assessment of the corruption risk in the framework of this process is mandatory and is based on a methodology common to all Group entities which draws on a multi-item assessment grid. The results of the ethics risk analysis are presented to the Group Executive Committee and to the Ethics, Environment and Sustainable Development Committee of ENGIE Board of Directors. Review of country risk in terms of human rights and corruption related with the Group activities development is also conducted by the Ethics, Environment and Sustainable development Committee of ENGIE Board of Directors. In order to implement its ethics policy and its commitment to fight against corruption, the Group also conducts ethics risks assessments prior to entering into transactions that are presented to the ENGIE investment committee, contracts with business consultants, sponsorship/patronage contracts, contracts with suppliers and subcontractors, and recruitments of persons in positions most exposed to corruption risks (due diligence policies).	<u>Cf.2020 Integrated Report : "Ethics and compliance" (p 42)</u> <u>Cf. 2021 Universal Registration Document - "3.8.2 Risk assessment" (p.116)</u> <u>Cf. ENGIE.com :Ethics compliance referential: "Ethical risks analysis"</u>
A <u>dedicated organization</u> supervised by the Ethics, Environment and Sustainable Development Committee, a specialized Board of Directors committee, has been established. Under the leadership of the Group General Secretary, who presides over the Compliance Committee, the Group Ethics, Compliance & Privacy Department ensures systematic integration of ethics into the Group's strategy, management and practices. It proposes reference texts for ethics and compliance, supervises their implementation by the operational entities and the functional departments, leads training initiatives, receives reports on ethical incidents and contributes to the necessary control activities with the Group's other monitoring and control organizations. The Ethics & Compliance network, which brings together over 230 ethics and compliance officers and ethics correspondents from the Group's entities who support their management in the implementation of ethical policies, is headed by the Ethics, Compliance & Privacy Department. Since 2018, the Ethics, Compliance & Privacy Department has expanded its scope of intervention to become the competent department for all issues requiring the implementation of a compliance procedure.	<u>Cf.2020 Integrated Report : " Ethics and compliance" (p 42)</u> <u>Cf.2022 Integrated Report "Ethics, Environment and Sustainable Development Committee" (p 45)</u> <u>Cf. 2021 Universal Registration Document - "3.8.1 Ethics and compliance governance" (p.116)</u> <u>Cf.2021 Universal Registration Document: "Ethics , Environment and Sustainable Development Committee » (p 157)</u>

The Group Ethics, Compliance and Privacy Department is thus responsible for personal data protection, export controls and embargoes, and interest representation. The Ethics, Environment and Sustainable Development Committee met 7 times in 2021 and handled the recurring themes and current topics related to ethics.	
The Ethics charter, which sets the general framework for the professional behavior of every employee: - The Group's Ethics charter and the Practical guide to ethics, updated in 2016; are available via the Group's internet website and published in 20 languages. These reference documents forbid bribery and corruption. - The Ethics charter and the Practical guide to ethics were massively distributed to employees when updated in December 2016, and to all new employees who commit to respect the ethics principles. Works to overhaul the Ethics Charter began in 2021 and the new Group Ethics Charter will be presented in 2022.	Cf.2020 Integrated Report -"Ethics and compliance » (p.42) Cf. 2021 Universal Registration Document - "3.8.3 Reference texts" (p 117) Cf.ENGIE.com : Principles and commitments
The handing over of the ethics reference documents to the newly hired employees along with ensuring that they are aware of the ethics principles and committed to following them (Group policy on the incorporation of ethics in HR processes).	Cf. ENGIE.com : ethical compliance referential
Ethics is included in the annual appraisal process for senior executives. At the end of 2014, the Group decided the widespread inclusion of ethics in all annual evaluations (Group policy on the incorporation of ethics in HR processes, updated in 2020).	Cf. ENGIE.com : ethical compliance referential
<u>Communication, manager and employee training developed within the Group</u> The ethics and compliance training plan for Group employees specifies the mandatory ethics training for all Group personnel according to their exposure, in the context of their missions for the Group, to ethics issues and in particular the risk of corruption and influence peddling. It is based on a Group practical guide "Mapping of populations most exposed to corruption risk" which specifies how the employees most exposed to the risk of corruption must be identified. As part of this training plan, the Group has determined specific mandatory training paths for the following three target categories: all employees, employees most at risk of corruption and executive managers. The latter must complete a mandatory training path which includes, in particular a specific training on the risk of fraud and corruption; this course has been attended by 96% of the Group managed roles (GMR) as at end of 2021. This training is also mandatory since 2016 for members of the ethics and compliance network. The training dedicated to the purchase line deployed in the Group since 2014 has been updated in 2016 and in 2019. This training has been supplemented in 2022 by a module to support the implementation of the due diligence policy for suppliers and subcontractors within the entities. An automatic reporting system for digital training has been established throughout the Group. In addition to implementing this Group framework, Group entities are responsible for setting up a training framework at their level (e.g. training for new hires, human rights training, etc.), using the training modules made available by the Group where applicable.	Cf.2020 Integrated Report : "Ethics and compliance" (p 42) Cf. 2021 Universal Registration Document - "3.8.5 Training" (p 118) Cf. ENGIE.com : mandatory ethics trainings



A status of ethics training is presented each year to the Ethics, Environment and Sustainable Development Committee of ENGIE Board of Directors.	
<u>Initiatives</u> The Group is involved in several multilateral international anti-corruption initiatives, such as: - UN Convention against Corruption (UNCAC) - The OECD anti-corruption initiative The Group is a member of several think tanks specialized in ethics: - Institute for Business Ethics (I.B.E.) - Cercle Ethique des Affaires (CEA) en France - Transparency International France	<u>Cf. 2021 Universal Registration Document - "3.8. Ethics and compliance" (p.116)</u> <u>Cf. ENGIE.com :our standards and memberships</u>

Criterion 14 : The COP describes effective monitoring and evaluation mechanisms for the integration of anti-corruption

The ethics policy is covered by a compliance and control system run by the Group's Ethics, Compliance & Privacy Department, which is accountable to the General Secretariat and works under the supervision of the Chief Executive Officer.	Reporting on the 10th principle against corruption "3. Monitoring" B7 + D12-D15 (p 22-24) <u>Cf. 2020 Integrated Report - "Ethics and compliance" (p.42)</u> <u>Cf. 2021 Universal Registration Document - "3.8.6 Controls and certifications" (p 118)</u> <u>Cf. ENGIE.com : control system</u>
<u>Whistleblowing and reporting of ethics incidents:</u> - A whistleblowing system is open to all Group employees and to all external third parts (customers, suppliers, etc.). In 2017 the Group set a new policy on whistleblowers that incorporates the French legal requirements of the Sapin II law and the duty of vigilance law. Within the framework of this policy which has been implemented gradually since 2018 in view of its Group-wide deployment in 2019, an alert can be issued, anonymously or not, via email or by phone. It is received by an external service provider that transmits the report in anonymized form to ENGIE for processing. In 2021, 187 alerts, 34% of which pertain to integrity (areas of business ethics, accounting and financial integrity, and conflicts of interest), were made in the framework of the ENGIE whistleblowing system. - ENGIE's compliance process imposes an obligation on all Group entities to report any suspicion of an ethics incident as soon as they become aware of it. This managerial notification of ethics incidents is done via a dedicated IT tool (« My Ethics Incident », Group digital tool). In 2021, 277 managerial reports of ethics incidents were submitted. Integrity-related incidents were the most represented (44% of incidents were in the areas of business ethics, accounting and financial integrity, and conflicts of interest). - Ethics incidents reported within the framework of the Group's whistleblowing system and ethics incidents declared within the framework of the Group's managerial reporting system are subject to systematic processing and implementation of corrective and preventive measures. These actions are monitored through the Group digital tool "My Ethics Incident". - The Compliance Committee assesses the handling of ethical incidents and monitors the process for updating the Group's ethics and compliance framework. - Yearly review of the ethics and compliance mechanisms and of the ethics incidents by the Ethics, Environment & Sustainable Development Committee of	<u>Cf. 2020 Integrated Report - "Ethics and compliance" (p.42)</u> <u>Cf. 2021 Universal Registration Document - "3.8.4 Whistleblowing and reporting of ethics incidents" (p 118)</u> <u>Cf. ENGIE.com : Ethical compliance system</u> <u>Cf. ENGIE.com : Whistleblowing system</u>

ENGIE Board of Directors	
<u>Audit and internal control:</u> • A self-evaluation questionnaire dealing with key ethical themes is implemented within the framework of Internal Control. The Group's internal control program ("INCOME") includes control activities that address the requirements of the French Sapin II law and the French law on the duty of vigilance. • Audits are conducted across the field of ethics and compliance policies	<u>Cf.2020 Integrated Report -"Ethics and compliance" (p.42)</u> <u>Cf. 2021 Universal Registration Document - "3.8.6 Controls and certifications" (p 118)</u> <u>Cf. ENGIE.com : control system</u>
<u>Annual Ethics Compliance procedure :</u> The roll-out and implementation of the anti-bribery system within the Group's entities is undertaken through a procedure called the "annual ethics compliance procedure". It is supported by a dedicated Group IT tool through which an annual report on the work and progress made by the Group's entities in terms of implementing the ethics and compliance system (including the anti-corruption program) is reported by the Ethics & Compliance Officers to the Ethics, Compliance & Privacy Department (« My Ethics Report »). The 2021 annual report has been submitted to the General Management Committee and the Ethics, Environment & Sustainable Development Committee of ENGIE Board of Directors.	<u>Cf.2020 Integrated Report -" Ethics and compliance" (p.42)</u> <u>Cf. 2021 Universal Registration Document - "3.8.6 Controls and certifications" (p 118)</u>
<u>External certification:</u> The Group is engaged in external audit processes of its ethics and compliance system. These audits were carried out at Group level and in several operating entities that are representative of the Group's activities. - ENGIE's anti-corruption system was certified by an external organization in 2015. - In 2018, the Group was awarded ISO 37001 certification in respect of its anti-bribery management systems by an external organization. In this context, certification control audits were carried out in 2019 and 2020 which confirmed the Group's ISO 37001 certification. - In 2021 ENGIE launched its second ISO 37001 certification audit campaign with the support of an external organization. The Group received its second ISO 37001 certification in 2021. The first control audit is foreseen to be finalized in October 2022.	<u>Cf. 2020 Integrated Report -" Ethics and compliance" (p.42)</u> <u>Cf. 2021 Universal Registration Document - "3.8.6 Controls and certifications" (p 118)</u> <u>Cf. ENGIE.com : control system</u>



II. Taking action in support of broader United Nations goals and issues

Criterion 15 : The COP describes core business contributions to UN goals and issues.

Since 2013, ENGIE openly advocates for the generalization of carbon prices in the World: - To signal for low carbon investments - As one of the best ways to accelerate the transition ENGIE is Member of the World Bank Carbon Pricing Leadership Coalition (IMF, WEF, IETA, UN Global Compact, CDP, ...) which committed to : - x2 by 2020 the coverage of emissions by carbon pricing regulations - and x2 again the coverage by 2030	http://www.carbonpricingleadership.org/
ENGIE has committed to carbon pricing through its involvement in the Caring for Climate initiative.	http://caringforclimate.org/
ENGIE respects, complies with and supports multilateral initiatives and the following international and regional legal frameworks: - the United Nations Convention Against Corruption (UNCAC – 2003); - the OECD Convention on Combating Bribery of Foreign Public Officials in International Business, which was first adopted in 1997 and was ratified by France in 2000; - the OECD Guidelines for Multinational Enterprises; - the Principles of the ICC (International Chamber of Commerce); - the Council of Europe's Civil Law and Criminal Law Conventions on Corruption (1999); - the French law of November 13, 2007, the French law Sapin II, the French law on the duty of vigilance, the Bribery Act, the FCPA, the Sarbanes- Oxley Act, the Dodd Frank Act	
ENGIE details its contribution to the United Nation SDG for 2030	Cf. 2022 Integrated Report pages 14-15
	<u>Cf. ENGIE.com : The Group's contribution to the Sustainable Development Goals</u>

Criterion 16 : The COP describes strategic social investments and philanthropy

The Group pays some €6 million a year into the Housing Solidarity Fund (FSL), in accordance with its public service agreement.	<u>Cf. 2021 Universal Registration Document page 115 “3.6.2.1 Fuel poverty of individual customers”</u>
The ENGIE Foundation supports projects by associations and NGOs in every region of the world, mainly – though not exclusively – in the countries in which it operates. It forms partnerships with the organizations it supports, and these partnerships are often long-term. The organizations' projects are highly diverse, but they all fall into the scope of the Foundation's key focal areas and programs: Childhood and Youth, Energy Partners, and Biodiversity and Cities.	<u>Cf. ENGIE.com: ENGIE foundation</u> <u>Cf. 2021 Universal Registration Document page 116 : « 3.6.2.3 ENGIE Corporate Foundation »</u>
In 2021, the ENGIE Foundation has financed 110 projects around its two main axes : integration for children and youth and access to sustainable energy and biodiversity. for approximately 400,000 beneficiaries.	<u>Cf. ENGIE.com: ENGIE foundation 2020-2021 activity report</u>
In line with its values and its business plan, ENGIE acts in solidarity to promote access to energy for all and fight against energy poverty. Its commitment and employee involvement are also reflected in the many skills sponsorship operations and partnerships with external and internal NGOs as part of the ENGIE Volunteers Program.	<u>Energy assistance</u>
The Rassembleurs d'Energies environmental and social impact fund invests in social enterprises that promote shared and sustainable growth for all based on clean and affordable energy and on innovative business models in conjunction with the Group's operating entities. At the end of 2021, the 22 companies in the portfolio operating on four continents have enabled the clean and affordable electrification of more than 6.5 million beneficiaries worldwide world.	<u>Cf. 2021 Universal Registration Document page 116 : « 3.6.2.2 The environmental and social fund “ENGIE Rassembleurs d'Énergies” »</u> <u>Cf. ENGIE Rassembleurs d'Energies</u>
Fondation Agir Pour l'Emploi ENGIE (FAPE) works to promote occupational integration and workforce re-entry for long-term job seekers and those excluded from the job market. To raise funds, Fape ENGIE relies on a network of solidarity consisting of ENGIE Group companies and their current and former employees. These funds come from: - donations from current employees, allocated through the profit sharing scheme, - donations from former employees, - companies matching employee donations. Additionally, FAPE ENGIE receives donations from other individuals and external companies that choose to support its efforts. Since its creation in 2013, FAPE (France and Belgium) has provided more than 2 million euros in grants to 200 projects working to promote access to employment and the fight against exclusion. These 150 projects have created 250 jobs and consolidated 250 jobs across the country.	<u>Projects supported by FAPE</u>

Criterion 17 : The COP describes advocacy and public engagement

Leader in energy transition, ENGIE supports the importance of engaging international economic leaders in climate thinking during Business and Climate Summits.	 Climate Week NYC 2020 Content Hub ENGIE Impact
At the Climate Finance Day 2017 in Paris, ENGIE and eight other green bond issuers (EDF, Enel, Iberdrola, Icade, Paprec, SNCF Network, SSE and TenneT) have publicly committed to further development of one of the most dynamic segments of today's sustainable financing, namely the green bond market.	Cf ENGIE.com : Industrial issuers of €26 billion in Green bonds pledge to double down on green financing
The Group's main commitments are presented in the 2022 Integrated Report.	Cf. 2022 Integrated Report page 25
At the One Planet Summit in Paris on December 12, 2017, ENGIE committed to follow the recommendations of the TCFD in terms of reporting on the impact of climate change.	https://www.fsb-tcfd.org/wp-content/uploads/2017/06/TCFD-Supporting-Companies-28-June-2017-FINAL.pdf Cf. 2022 Climate report TCFD report Cf. 2021 Universal Registration Document page 73 : 3.1.3 "Climate trajectory (related to the recommendations of the TCFD: Task Force on Climate-related Financial Disclosures) " page 73
The SBT (Science Based Targets) initiative aims to encourage companies to take ambitious climate action by validating the compliance of their forecasted CO2 eq emissions to the commitments of the Paris Agreement. The Group has obtained SBT certification.	Cf. 2021 Integrated Report page 29: "Climate issues " Cf. 2021 Universal Registration Document "3.1.4 Science Based Targets certification and carbon neutrality"page 74

Criterion 18 : The COP describes partnerships and collective action

Various partnerships and memberships have been concluded with national and international bodies in support of ENGIE's environmental and social responsibility efforts.	Cf.2022 Integrated Report pages 25 : Commitments for collective progress
---	---



III. CSR corporate governance and leadership

Criterion 19 : The COP describes CEO commitment and leadership

ENGIE supports the Global Compact	<u>Cf. ENGIE.com : ENGIE supports the Global Compact</u>
-----------------------------------	--

Criterion 20 : The COP describes Board adoption and oversight

Environmental and social responsibility is governed at the very highest level within the ENGIE Group: by the Board of Directors' Ethics, Environment and Sustainable Development Committee, the Group's Management Committee, and the Environmental and Social Responsibility Executive Committee.	<u>Cf 2021 Universal Registration Document 3.1.1 "CSR policy and governance"</u> <u>Cf. ENGIE.com : Board committees</u>
The Ethics, Environment and Sustainable Development Committee oversees compliance with both the individual and collective values on which the Group's actions are based and with the rules of conduct that must be applied by every employee. The Committee met four times in 2019, with an average attendance rate of 100%.	<u>Cf. 2022 Integrated Report pages 47 : Ethics, Environment and sustainable development Committee</u> <u>Cf. 2021 Universal Registration Document page 159 : 4.1.2.4.4 « The Ethics, Environment and Sustainable Development Committee »</u>

Criterion 21 : The COP describes stakeholder engagement

ENGIE's responsible growth strategy is anchored in stakeholder dialogue. The Group set a target for 2020 : to set up a suitable mechanism for dialogue and consultation with stakeholders in 100% of its industrial activities. This target was achieved at end of 2020.	<u>Cf. 2022 Integrated Report : "A value shared with our stakeholders " p 36-37</u>
The year 2020 was marked by the establishment of two forums for dialogue: a Stakeholder Committee in charge of challenging the Group's strategy, and an access space made up of members of civil society, companies and local authorities, responsible for supporting sensitive projects. These committees met for the first time in 2021. The adaptation of the Group's business model cannot be done without taking into account the social impacts of the transition to a low-carbon economy. ENGIE is promoting a just transition that leads it to manage the restructuring of its activities while striving to decisions that are as satisfactory from an environmental point of view as from a social one. This is particularly the case in the context of the end of its coal and nuclear activities.	<u>Cf. 2021 Universal Registration Document 3.6.1 "Dialogue with stakeholders and partnerships" page 115</u> <u>Cf. 2021 Universal Registration Document 3.6.3 "Just transition" pages 116-117</u>