

Date 30/09/2020

Communication on Progress – ENGIE and Global Compact

Category Global Compact Advanced Company

October 2020

This document shows the correspondence between the information contained in ENGIE 2020 Integrated Report published in April 2020 and the 21 'GC Advanced' criteria of the Global Compact.

The following sources are also associated with the correspondence grid:

- the ENGIE 2019 Universal Registration Document published in March 2020
- the ENGIE website: www.engie.com
- previous Integrated reports and Registration documents when necessary



Self Evaluation

- 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?
 Not applicable
- 2. How are the accuracy and scope of information in your COP evaluated by a credible third party?

2020 Integrated Report and 2019 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 2019 Universal Registration Document pages 116 to 119 and page 65 of the 2020 Integrated Report

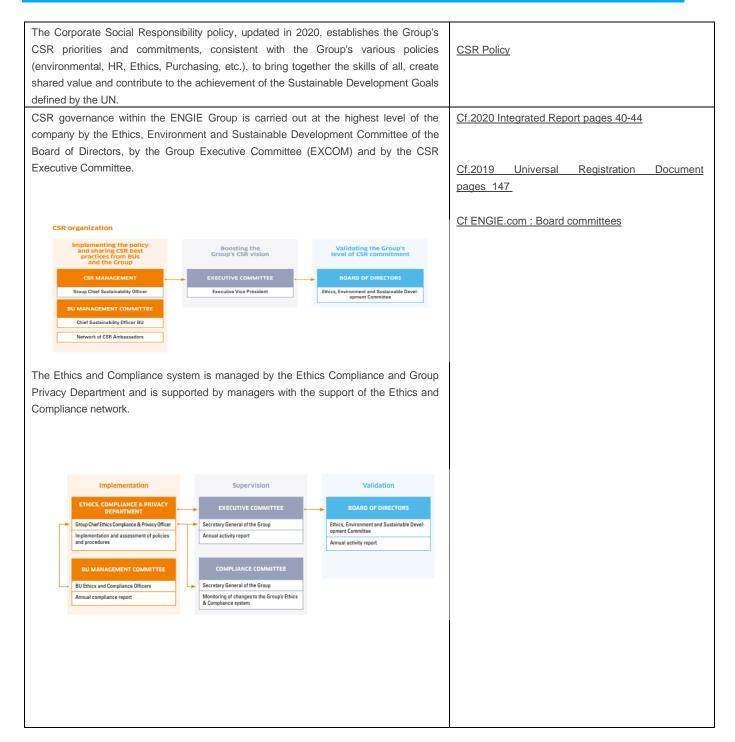
3. Does your COP incorporate high standards of transparency and disclosure?

<u>2020 Integrated Report</u> learns from the reference framework of the International Integrated Report Council (see <u>2020 Integrated Report page 0</u>). The Group published its first report in November 2014. The 2020 Integrated Report was published in April 2020 before the Group General Annual Meeting.



I. Implementing the ten principles into strategies and operations

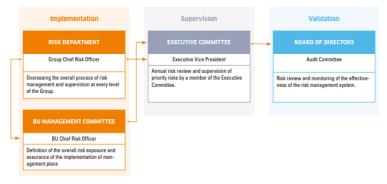
Criterion 1 : The COP describes mainstreaming into corporate functions and business units.





The overall risk management is based on the following organization:

Organization of risks



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 Business Unit CSR Responsibility managers (one in each BU, member of the Management Committee of the Business Unit)
 - members of the Corporate CSR Department

open to all employees of the Group.

Annual Performance Reviews with each 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
 More broadly, the CSR Department has also launched a network of CSR ambassadors

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 \leqslant 3.4 billion in 2019. The total amount issued by ENGIE in Green Bonds reached \leqslant 11.15 billion at the end of March 2020 following the new emission of \leqslant 1.5 billion in March 2020.

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 2019, a total of €1,299 million had been allocated to Eligible Projects in the field of renewable energy sources on the Green Bonds of January 2018 and January 2019. When fully operational, these projects should contribute to avoiding

Cf. ENGIE.com : CSR governance

<u>Cf. 2019 Universal Registration Document " 5.1.5.4</u> <u>Green Bonds" pages 183 to 190</u>

<u>Cf. 2020 Integrated Report</u>: Allocation of the January 2019 Green Bond by technology

Cf. ENGIE.com: sustainable finance

<u>Cf. ENGIE.com</u>: <u>Contribution of funded projects to</u> sustainable development goals



greenhouse gas emissions by a minimum of 5.92 million metric tons of CO2 eq. per year. 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.	
The Group applies ten non-financial criteria relating to ethics, CO ₂ emissions, social impact, human resources, environmental management of ecosystems, stakeholder involvement, local purchasing and health and safety to all of its investment projects. Furthermore, the Group takes account of the CO ₂ cost of its investments. These criteria are presented, analyzed and evaluated for each new investment project of a certain amount.	Cf. ENGIE.com CSR criteria



Criterion 2: COP describes value chain implementation

ENGIE's Purchasing and Procurement Policy 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. The policy is driven by three core objectives: contributing to ENGIE's performance, acting as a model for creating synergies within the Group, and being an ambassador for the company's values in dealings with suppliers by encouraging them to sign up to the UN Global Compact, among other things.

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 policy defines ENGIE's commitments and requirements in the following

- 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

Procurement governance

Group Procurement.

Policy & Governance
Financial
Guidance

3 Operational Processes

Enterprise
Risk Mul.

Deliverables

Performance & Implementation
Indicators

Procurement function Steering & Compliance

Cf. ENGIE procurement policy

Cf. 2019 Universal Registration Document page 109 "
3.7 Purchasing, Subcontracting and Suppliers"

7 principles in our relationships with suppliers

Following an assessment campaign started at the end of 2018, ENGIE signed a long term services contract with EcoVadis. This new partnership will help the Group to monitor its main suppliers panel in a CSR perspective. In June 2019, the CSR assessment of suppliers was extended to the Major Suppliers of the BUs to cover a panel of around 1,400 existing suppliers in nearly 70 countries and representing a significant portion of expenditure. At the end of May 2020, the overall score of assessed suppliers is 55,2/100 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 embraces continuous

Cf.ENGIE.com: sustainable purchasing



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 in order to monitor its Cf. 2020 Integrated Report : Our objectives CSR performance as closely as possible. Among these 19 objectives, one aims to have 100% of preferential suppliers Cf. CSR Procurement objectives (excluding energy purchases) certified SBT (Science-based target) by 2030. 🧐 Planet 2019 Objective Objective 2030 Contribution to SDGs Other management objectives are also implemented and concern: the CSR assessment of suppliers, payment terms and inclusive purchasing. An online training programme targeting all of ENGIE's sales teams has been launched 2018 Registration Document page 103 3.7Purchasing, Subcontracting and Suppliers" 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 addition, in 2018, training was given to 840 buyers on advanced purchasing controls incorporating the requirements of the new laws (Duty of Care and Sapin 2). In 2019 and

2020, two presential training sessions complete these measures aiming to train more

ENGIE has set up a supplier portal that enables innovative SMEs to publicise

than 1300 employees across ENGIE Group.

themselves and get included in ENGIE's supplier pool.

https://www.engie.com/en/commitments/procurement/



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	Cf. 2020 Integrated Report - "Ethics and compliance & Vigilance Plan" (p.42-43) Cf. 2019 Universal Registration Document - "3.8.3 Reference texts" (p.110) Cf. 2019 Universal Registration Document - "3.9 Vigilance plan" (p.112) Ethics charter
vigilance.	Practical guide to ethics
They complement the Group's existing actions related to the respect for human rights.	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. <u>ENGIE.com</u> – The Group's human rights approach <u>Cf.2020 Integrated Report- "Ethics and compliance & Vigilance Plan" (p 42-43)</u>
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 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.2019 Universal Registration Document - "3.9 Vigilance plan" (p.112) 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.	Cf.2019 Universal Registration Document - "3.9 Vigilance plan" (p.112) Cf. ENGIE.com : vigilance plan



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-Cf.2019 Universal Registration Document contractors, business consultants), in order to include the challenges related to the "3.8.5 Training and awareness" (p 111) duty of vigilance. Since October 2016, an e-learning module "Business and Human Rights" is available Cf. ENGIE.com: The Group's human rights to all Group employees to present them the Group's approach and commitments approach 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. Cf. ENGIE.com: The Group's integrity approach 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 Cf. ENGIE.com: Mandatory ethics trainings ("companies for human rights") since many years) has been made available. Scribings, 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 distance training has been established throughout the Group. The Human Rights referential is public and freely available on the Group's website. It Cf. 2019 Universal Registration Document was communicated to all senior executives and to all ethics and compliance officers "3.9 Vigilance plan" (p.112) who are in charge of its distribution and implementation. The Human Rights referential and policy are the result of a broad consultation with Cf. ENGIE.com: The Group's human rights operational entities and support functions. They complement specific human rights approach policies (such as health & safety or responsible procurement) and aim to promote a proactive and global human rights approach. Cf. ENGIE.com: vigilance plan 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. This 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. ENGIE.com - references and 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 memberships/ practices, especially by the operational implementation of the UN Guiding Principles. 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.	Cf.2020 Integrated Report -"Ethics and compliance & Vigilance Plan" (p.42-43) Cf.2019 Universal Registration Document -"3.8.3 Reference texts" (p.110) Cf.2019 Universal Registration Document : « 3.9 Vigilance plan » (p.112) Cf. ENGIE.com : Vigilance plan Cf. ENGIE.com : The Group's human rights approach
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 Commitments 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	Cf.2020 Integrated Report - "Ethics and compliance & Vigilance Plan" (p.42-43) Cf.2020 Integrated Report : "An engaged Board" (p.35) Cf.2019 Universal Registration document -"3.8.2 Risk assessment" (p.110) Cf.2019 Universal Registration Document: "3.8.3 Reference texts" (p.110) Cf.2019 Universal Registration Document: "3.9 Vigilance plan" (p.112) Cf; ENGIE.com : Ethics compliance referential: "Ethics risks analysis" Cf. ENGIE.com : Due diligence Cf. ENGIE.com : The Group's human rights approach Cf. ENGIE; com : Vigilance plan
At the operational level, annual human rights risks assessments are conducted by entities and reported trough 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 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.2020 Integrated Report - "Ethics and compliance & Vigilance Plan" (p.42-43) Cf.2019 Annual Registration Document - "3.8.3. Reference texts" (p.110) Cf.2019 Universal Registration Document : "3.9 Vigilance plan"(p 112) 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.	Cf. ENGIE.com : procurement policy https://www.engie.com/en/group/suppliers/susta inable-purchasing-policy



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 <u>Code of conduct in supplier relations</u> (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.

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.

Scribings, 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 distance training has been established throughout the Group.

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.

Within the General Secretariat, the Ethics, Compliance & Privacy Department coordinates the implementation, with the support of a global network of more than 190 persons.

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

Cf. ENGIE.com : Integrity referential

<u>Cf.2020 Integrated Report -"Ethics and compliance & Vigilance Plan" (p.42-43)</u>

<u>Cf.2019 Universal Registration Document: "3.7 Purchasing, subcontracting and Suppliers"(p</u> 109)

Cf.2019 Universal Registration Document : "3.8.5 training and awareness" (p 111)

Cf.2019 Universal Registration Document : "3.9

Vigilance plan" (p 112)

<u>Cf. ENGIE.com</u>: The <u>Group's human rights</u> approach

Cf. ENGIE.com : Vigilance plan

<u>Cf. ENGIE.com</u>: <u>Mandatory ethics training</u> https://www.engie.com/en/group/ethics-andcompliance/policies-and-procedures/ethicalcompliance-referential/training

Cf. 2019 Universal Registration Document - 3.8.5

Training and awareness' (p.111)

Cf. ENGIE com : Mandatory othics trainings

Cf. ENGIE.com: Mandatory ethics trainings
https://www.engie.com/en/group/ethics-andcompliance/policies-and-procedures/ethicalcompliance-referential/training

Cf.2020 Integrated Report: "Ethics and compliance & Vigilance Plan" (p 42-43)

Cf.2019 Universal Registration Document -"3.8.1

Organization and structure" (p.110)

Cf.2019 Universal Registration Document "3.9

Vigilance plan » (p112)

<u>Cf. ENGIE.com :ethics compliance referential: "</u> <u>main parties involved in ethics compliance"</u>

<u>Cf. ENGIE.com : The Group's human rights</u> <u>approach Cf. ENGIE.com : Vigilance plan</u>



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.



participation to voluntary initiatives.

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.2020 Integrated Report: "Ethics and compliance & Vigilance Plan" (p 42-43) Cf.2019 Universal Registration Document - "3.8.6. Controls and certifications" (p.111) Cf.2019 Universal Registration Document: "3.9 Vigilance plan" (p 112) 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 tool "REPORT'ethics"): the ethics and compliance officers prepare a report on the progress in ethical organization made by their respective entities, submitting this, together with a compliance letter from the entity's manager, to the Group CEO via the BU ethics and compliance officers. 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.	Cf.2019 Universal Registration Document: « 3.9 Vigilance plan »(p 112) Cf. ENGIE.com: control system Cf. ENGIE.com: The Group's human rights approach Cf. ENGIE.com: Vigilance plan
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.	
The internal ethics incidents reporting procedure (which relies on the dedicated Group tool "INFORM'ethics") includes explicitly human rights incidents.	Cf.2020 Integrated report : "Ethics and compliance & Vigilance Plan" (p 42-43) Cf.2019 Universal Registration Document - "3.8.4. Whistleblowing and reporting of ethics incidents" (p.111) Cf. ENGIE.com: Group Codes of Conduct Cf. ENGIE.com : Ethical compliance referential
ENGIE maintains constant and proactive dialogue with its stakeholders, through dedicated operational mechanisms for dialogue and consultation and by its	Cf.2019 Universal Registration Document: "3.9 Vigilance plan" (p 112)



The vigilance plan and its operational implementation are presented annually to employee representative bodies via the existing committees: the European Works Council, the Committee on Ethics, the Environment and Sustainable Development, and 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.

Cf. ENGIE.com : The Group's human rights approach

Cf. ENGIE.com: vigilance plan

Cf. ENGIE.com: Stakeholder engagement

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.

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.

<u>Cf.2019 Universal Registration Document -</u>
<u>"3.8.4. Whistleblowing and reporting of ethics incidents" (p.111)</u>

<u>Cf.2019 Universal Registration Document : "3.9 Vigilance plan" (p 112)</u>

<u>Cf. ENGIE.com : Whistleblowing system</u> <u>Cf. ENGIE.com : The Group's human rights</u> approach

Cf. ENGIE.com : Vigilance plan
Cf.2020 Integrated Report - "Ethics and
compliance & Vigilance Plan" (p.42-43)



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 its Global Agreement on Fundamental Rights, Social Dialogue and Sustainable Development signed in 2010, ENGIE recalls that it fully supports international standards, including the Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises, the ILO Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy and the UN Global Compact These instruments incorporate, among others, the rights elaborated in the ILO Declaration of Fundamental Rights at Work (Freedom of Association and Collective Bargaining, conventions 87 and 98; Discriminations, conventions 100 and 111; Forced Labour, conventions 29 and 105; Child labour, conventions 138 and 182) and convention 94 concerning Labour Clauses in public Contracts. The principles contained in all of the listed instriments are considered to be part of this agreement.	Cf ENGIE.com : Social Dialogue Cf. 2019 Universal Registration document page 83 : « 3.4.5 Employee relations »
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. In 2016 a seminar gathered HR-Health and Safety network and workforce representatives to share practices for auditing and improving the quality of life in the workplace and to study together the working axes. Monitoring committees for the various collective agreements signed at Group level met in 2019 to review the implementation of these commitments.	Cf. Universal Registration Document "3.4.6.5 Dialogue with social partners"
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.	Agreements and fundamental principles of the Health and Safety Policy Cf.2020 Integrated Report page 38: "Safe, fulfilling work conditions"
The Group has set a new goal for 2020 an internal occupational accident frequency rate of lower or equal to 3 (at 2015 scope)	Cf. 2020 Integrated Report page 61 : "Preserving health, safetyand security at work"



A managerial system comprising a 2016-2020 action plan, training courses, internal controls and audits, certifications, benchmarks and feedback, ENGIE has succeeded in reducing the frequency of occupational accidents involving its employees. Thereby the frequency rate is of 3.7 in 2019 for a target of 3.9 at 2019 scope. The Group is committed to a new indicator by 2030: - a frequency rate of accidents with lost time of Group employees and subcontractor employees on closed sites ≤ 2.9 - the prevention rate, a new indicator on the identification and anticipation of risks, thus promoting prevention. The goal is to have a prevention rate ≥ 0.75 by 2030.	Cf. 2020 Integrated Report page 61: Preserving health, safety and security at work Cf. 2020 Integrated Report page 67: "Social indicators" Cf. 2019 Universal Registration Document page 75 "The "health and safety at work" challenge"
The Group is closely monitoring developments in the situation related to the Covid-19 epidemic and is implementing the appropriate measures to prevent the contamination of its employees, subcontractors and customers depending on the state of contamination of the various countries where it operates. The system put in place includes: a Group steering committee, 3 geographic committees (France-Belgium-International) in addition to the country committees and a General Management committee as well as the dissemination of information on intranet sites and regular videoconference meetings with local management and Group management. This system should facilitate the return to work, while preserving the health of employees, the resumption of commercial activity and the resumption of our supplies in the event of a disruption.	Cf. ENGIE.com : COVID-19 Mobilization
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	Cf. 2020 Integrated Report page 21 Cf. Global Business and Disability Charter Cf. <u>l'autre cercle LGBT Charter</u> Cf. <u>European manifesto « Embrace difference »</u>
The Group continues its efforts in diversity and has set a 2020 target: 25% of women in the Group's workforce. At the end of 2019, women represent 20.9% of the workforce. The Group has set itself two new objectives in terms of gender diversity and equality by 2030: - have 50% of women in management by 2030 - have a 100% gender equity index for the entire Group	Cf. 2020 Integrated Report page 14 "Our objectives" Cf. 2020 Integrated Report page 38 "What objective has the Group set for itself to combat gender inequality?" Cf. 2020 Integrated Report page 67 "Social indicators" Cf. 2019 Universal Registration Document pages 80-82 "3.4.3 Social commitment: Building a company committed to corporate citizenship and solidarity" Cf. ENGIE.com
Engie works to promote diversity of business by raising awareness: "I learn Energy", "Elles bougent", "Girls and Boys day day.	« J'apprends l'énergie » « Elles bougent »



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 obtained in 2017 the renewal of the diversity label for a four-year period for all Group production and services activities in France.	Cf. 2019 Universal Registration Document pages 80-82 "3.4.3 Social commitment: Building a company committed to corporate citizenship and solidarity"
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.	Global alliance for YOUth
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. In 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.	Cf. 2020 Integrated Report page 38 "Adapting skills to prepare for the future" Cf. Universal Registration Document page 77 "3.4.1.1 Anticipation of the skills needed to prepare for the future "



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

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. 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.	Cf. 2019 Universal Registration Document page 77 "3.4.1 Human resources development and mobility policies" Cf. 2019 Registration Document page 83 « 3.4.5 Employee relations »
Engie signed a European agreement in April 2016 to support the implementation of its enterprise project. This agreement has two priorities: strengthening professional excellence and develop the employability of its employees. It provides a budget of € 100M per year over 3 years dedicated to training and to achieve the goal of training each year 2/3 of employees from each company. Furthermore, it will strengthen the mobility (functional and geographical). 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. A new "Leadership Model," in line with the Group's strategy and its transformation, was rolled out to managers. The Leadership Way identifies 4 behaviors core (Bold, Open, demanding, Caring) and 5 goals of Leader to inspire everyday behaviors and impact the team members. To support its deployment, the Co-Leaders training was launched in 2017 and attended by 25,000 managers at the end of 2019.	Cf. ENGIE.com: Social dialogue Cf. 2019 Universal Registration Document page 83 « 3.4.5 Employee relations » Cf. 2019 Universal Registration Document page 78 "3.4.1.4 Targeted development policies" Cf. 2020 Integrated Report page 61 " Developing employability"
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. A managerial programme comprising an action plan for 2016-2020, training programmes, internal audits and inspections, external certification, benchmarking and feedback, reinforced by "Safety Inspections" has enabled ENGIE to drive down the accident frequency rate among its employees. The objectives for the period 2016-2020 relate in particular to the reduction in work accident and reducing absenteeism for medical reasons.	Cf. 2019 Universal Registration Document page 78 "3.4.1.4 Targeted development policies" Cf. 2019 Universal registration Document : 3.4.6 "Health and safety policy " pages 83-84
The WIN (Women in Networking) network has over 2,000 members among the Group's female staff. It offers members regular exchanges and group discussions on professional challenges and ENGIE's strategy and has members in twenty countries.	Cf. ENGIE.com : Ambitious goals for professional equality and gender diversity



Each of ENGIE's entities in France implements the Group's disability policy, whilst Cf. 2019 Universal Registration Document pages 80-81: "3.4.3 Social commitment: Building a taking account of specific operational and local characteristics. At present, 11 collective agreements approved by the Regional Directorates for Businesses, company committed to corporate citizenship and Competition, Consumption, Labour and Employment cover some 95% of the solidarity" Group's employees in France. At the end of 2019, the Group's employment rate in France was 4.3%. the Group signed in 2018 a new agreement 2018-2020 aiming to: - to promote the recruitment of people with disabilities - to accompany and propose the necessary adjustments - to support changes in career paths - to develop purchases in the protected and adapted sector ENGIE is actively involved in a number of projects that use sport as a driver and vector Cf. 2019 Universal Registration Document pages for social and professional inclusion. 80-82: "3.4.3 Social commitment: Building a

company committed to corporate citizenship and

solidarity"



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 50.	Cf. 2019 Universal Registration Document page 83: "3.4.6.2 The health and safety management system"
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.	Cf. ENGIE.com : Note on the methodology of social indicators
ENGIE has adopted a social reporting method that has been checked against the AA1000 standards by its statutory auditors.	Cf. ENGIE.com: Note on the methodology of social indicators Cf. ENGIE.com: Social reporting Cf.ENGIE.com
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.	Cf. 2019 Universal Registration Document page 80: 3.4.3 Social commitment: Building a company committed to corporate citizenship and solidarity Cf. 2020 Integrated Report page 21: "Our other commitments"



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.	
the officed realions i famework convention on offinate change.	
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 in 2030 - GHG emissions linked to the use of products sold, in line with the SBT trajectory, i.e. 52 Mt in 2030 - 100% of the proposals made to customers will include an alternative contributing to their decarbonisation - 100% of our preferred suppliers (excluding energy purchases) certified by the Science	Cf. 2020 Integrated Report page 17 : "Ambitious targets for 2030" Cf. CSR Policy
Based Targets initiative	
The Group has set environmental targets for 2020 which: Share of renewable energy in the production capacity mix in 2020: 25% CO2 emission reduction rate for power generation compared with 2012 The results in 2019 are the following: Share of renewable energy in the production capacity mix: 27,8% CO2 emission reduction rate for power generation compared with 2012: -43.7%	Cf. 2020 Integrated Report page 14 : Our objectives Cf. 2020 Integrated Report page 54 : Contributing to the protection of the environment Cf. 2020 Integrated Report page 67: Environmental indicators Cf.2019 Universal Registration Document page 16 : 1.2.2 CSR indicators
In June 2020, ENGIE has updated its CSR, environmental and societal policies.	Cf. ENGIE.com : CSR policy Cf. ENGIE.com : environmental policy Cf. ENGIE.com : societal policy
During 2020 H1 Financial results presentation, the Group reaffirmed its commitment to accelerate the development of renewable energies developing 1GW more than initially planned per year. The Group will therefore develop an additional 11 GW of renewable energies over the 2019-2021 period. It also sets itself the objective of having 58% of renewable energies in its electrical capacities by 2030.	Cf. ENGIE.com: H1 2020 results Cf.2020 Integrated Report page 27 "Increase in installed capacity by 2021 Cf. 2020 Integrated Report page 14 "Our objectives"
	21



In addition to its environmental policy, in terms of preservation of biodiversity, ENGIE has renewed its commitment to the SNB for the 2016-2018 period, with the ambition of: • identify and publicize internally all the benefits and opportunities related to actions in favor of biodiversity; • set up on the Group's sites voluntary and concerted approaches with stakeholders; • to anchor biodiversity as an integral dimension of the Group's performance. As part of the Act4nature initiative, on July 10, 2018, ENGIE joined forces with around 60 companies to protect biodiversity by adhering to the 10 common commitments and adding specific commitments . to the Group.	Cf. ENGIE.com : Biodiversity Policy : 5.3. Goals and commitments Cf. ENGIE.com : Protecting biodiversity is a priority for the Group's businesses and projects Cf. ENGIE's Act4nature commitment Cf. act4nature — ENGIE's statement of the 2018 commitments
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 2019
ENGIE has signed the Energy Efficiency Charter for Public and Private Commercial Buildings.	Charter updated in 2017 2018 Communication on Progress
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, NOx and particulate matter.	Cf. 2019 Universal Registration Document page 105 "3.5.4.7": Atmospheric pollutants »
The Group's procurement policy sets down the following principles for sourcing: • All calls for tender must follow a set structure and must be issued by purchasers based on an optimized statement of need to keep the overall acquisition cost as low as possible (including operating, maintenance and end-of-life costs); the relevant need must be stated in line with functional specifications as far as possible and should specify all applicable requirements, in particular in terms of technical aspects, performance, health, safety, social responsibility and environmental aspects. • All tenders received from suppliers must be analyzed by the purchasing advisor and the purchaser against a specific scale for assessing compliance with the various requirements set out at the statement-of-need stage; all eligible tenders must then be clarified; needs may need to be developed further; if the statement of need is amended, all the companies consulted must be invited to submit a fresh tender based on the amendments made.	Cf.2019 Universal Registration Document page 109: «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. 2019 Universal Registration Document page 65: 3.1.3 Update on the work of the TCFD Cf. 2020 Integrated Report page 19: A detailed analysis of climate risks



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

The CSR Executive Committee implements the CSR policy, ensures the capitalization of experiences between the Corporate and the various BUs, and exchanges on CSR strategies. Chaired by the Group CSR Director, it brings together each month the Environmental and Social Responsibility managers of the BUs (one in each BU, member of the BU's Management Committee) and members of the Group CSR Department. After validation by the Deputy CEO in charge of CSR, the CSR Department regularly presents current topics (Science-Based Target, Task force on Climate-related Financial Disclosures, CSR commitments) and an annual report (CSR ratings, CSR objectives, environmental and societal actions of the Group and the BUs) to the EESDC (Ethics, Environment and Sustainable Development Committee) of the	Cf. ENGIE.com: CSR governance
Board of Directors. 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	Cf. ENGIE.com : Note on the methodology of environmental indicators Cf. ENGIE.com : Statutory Auditors' Assurance
statutory auditors.	Notices
The Group has mapped the environmental and health risks it may encounter. Complaints and convictions related to environmental or health damage amounted to 10 and 1 respectively in 2019, and gave rise to compensation of € 13k. In 2019, environmental expenditure (investments and current operating expenses linked to the preservation of the environment) amounted to more than 466 million euros.	Cf. 2019 Universal Registration Document page 105 « 3.5.4.9 Active prevention of 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. 2019 Universal Registration Document page 112: "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. Statutory auditors certification on CSR information published Cf. Statutory auditors reasonable assurance on a selection of CSR information Cf. ENGIE.com: Statutory Auditors' Assurance Notices
The Group's top management sponsors ENGIE's efforts to make the environment an integral part of its management approach. BU-trained auditors, supported by the relevant Corporate departments, conduct environmental audits to ensure that environmental legislation is respected in the field and assess major environmental risks. Each year, the Group's BU directors make fresh commitments to comply with legislation and guarantee the quality/reliability of environmental data.	
The Group submits an environmental report to the Executive Committee and the Board of Directors' Ethics, Environment and Sustainable Development Committee every year.	Cf. 2020 Integrated Report page 34 : Strong involvement by Board Committees in 2019 Cf.2019 Universal Registration Document page 144 : « 4.1.2.4 Standing committees »
The Corporate Audit and Risk Division has a team devoted solely to environmental issues. This team carries out a number of thematic audits each year, examining issues such as waste management and water management ENGIE fills out the CDP's questionnaire every year. In 2018, the Group scored A for CDP Climate and A- for CDP Water.	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.

The zero tolerance message has been reiterated by the CEO of ENGIE on several occasions (e.g. when the Ethics charter and Practical guide to ethics were updated): «We have a very clear policy: zero tolerance, particularly regarding fraud and corruption, and complete commitment to compliance with ethical rules – those of the countries in which we operate and those we set for ourselves.

Although our Group draws strength from its operational excellence, it is also recognized by all of its partners and customers for its very high level of reliability and responsibility. It is therefore down to each and every one of us to live up to the trust that is placed on us, by making ethics an absolute priority every day."

Introduction of ENGIE Ethics Charter of November 2016 by the CEO

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

Reporting on the 10th principle against corruption: " 1 Commitment and policy" B1-B + D1-D5 (p 7-

Cf.2020 Integrated Report - "Ethics and compliance" (p.42)

Cf. 2019 Universal Registration Document -"3.8. Ethics, and compliance" (p.110)

<u>Cf. 2019 Universal Registration Document :</u>
"3.8.3 reference texts" (p 110)

Cf. ENGIE.com: Integrity referential

Cf. ENGIE.com: Principles and Commitments

ENGIE Ethics charter

<u>Cf.2020 Integrated Report - "Ethics and compliance" (p.42)</u>

<u>Cf.2019 Universal Registration Document :</u>
"3.8.3 Reference texts" (p 110)

Cf. ENGIE.com : Integrity referential

Cf. ENGIE.com: The Group's integrity approach



- Suppliers and direct sub-contractors
- Gifts and hospitality
- 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

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 Ethics, the Practical guide to Ethics, the procurement policy, the document "ethics business relationships: governing principles", the code of conduct in supplier relations, and issued on its website.

Cf. ENGIE.com: Procurement

<u>Cf. ENGIE.com</u>: Integrity referential Cf. ENGIE.com: Codes of conduct



Criterion 13: The COP describes effective management systems to integrate the anticorruption principle

The Group has implemented a scheme to fight against corruption which comes as follows:	Reporting on the 10 th principle against corruption "2. Implementation" B3-B6 + D6-D11 (p 13-21)
Risk assessment 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 commitments committee, contracts with business consultants, sponsorship/patronage contracts, and contracts with suppliers and subcontractors (due diligence policies).	Cf.2020 Integrated Report: "Ethics and compliance" (p 42) Cf.2019 Registration Document- "3.8.2. Risk assessment" (p.110) Cf. ENGIE.com: Ethics compliance referential: "Ethical risks analysis"
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 helps to integrate ethics into the Group's vision, 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 190 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 has expanded its scope of intervention to become the competent department for all issues requiring the implementation of a compliance procedure. The Group Ethics, Compliance and Privacy Department is thus responsible for personal data	Cf.2020 Integrated Report: "Ethics and compliance" (p 42) Cf.2020 Integrated Report "an engaged Board" (p 35) Cf.2019 Universal Registration Document- "3.8.1 organization and structure" (p 110) Cf.2019 Universal Registration Document: "Ethics, Environment and Sustainable Development Committee » (p 147)



protection, export controls and embargoes, interest representation and trade secrets.	
The Ethics, Environment and Sustainable Development Committee met 4 times in 2019 and handled the recurring themes and current topics related to ethics. Privacy Department is thus responsible for personal data protection, export controls and embargoes, interest representation and trade secrets.	
The Ethics, Environment and Sustainable Development Committee met 4 times in 2019 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 languagesThese 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.	Cf.2020 Integrated Report -"Ethics and compliance » (p.42) Cf.2019 Universal Registration Document - "3.8.3. Reference texts" (p.110) 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
Communication, manager training and employee awareness developed within	Cf.2020 Integrated Report : "Ethics and
the Group	compliance" (p 42)
The specific training on the risk of fraud and corruption has been attended by 86% of the Group managed roles (GMR) as at end of 2019. This training is also mandatory since 2016 for members of BU's general management committees and members of the ethics and compliance network, and strongly recommended for business developers.	Cf.2019 Universal Registration Document : "3.8.5 Training and awareness" (p 111)
The training dedicated to the purchase line deployed in the Group since 2014 has been	Cf. ENGIE.com : mandatory ethics trainings
updated in 2016 and in 2019. E-learning and scribings are accessible to all employees. An automatic reporting system for distance training has been established throughout the Group.	
Ethics and compliance training plans are prepared at Group and BUs/entities levels. A status of ethics training is presented each year to the Ethics, Environment and Sustainable Development Committee of ENGIE Board of Directors.	



Initiatives

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

Cf.2019 Universal Registration Document -

"Ethics, and compliance" (p 110)

<u>Cf. ENGIE.com</u> :our standards and <u>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 10 th principle against corruption "3. Monitoring" B7 + D12-D15 (p 20-22) Cf.2020 Integrated Report -"Ethics and compliance" (p.42) Cf.2019 Universal Registration Document - "3.8.6. Control and certifications" (p 111) Cf. ENGIE.com: control system
	OI. EIVOIE.com : control system
 Ethics incidents: 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 whistle-blowers 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. Managerial notification of ethics incidents is done via a dedicated IT tool ("INFORM'ethics") Ethics incidents are subject to systematic processing and implementation of corrective and preventive measures 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 ENGIE Board of Directors 	Cf. 2020 Integrated Report -"Ethics and compliance" (p.42) Cf. 2019 Universal Registration Document - "3.8.4. Whistle-blowing and reporting of ethics incidents" (p.111) Cf. ENGIE.com: Ethical compliance system Cf. ENGIE.com: Whistleblowing system
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	Cf.2020 Integrated Report -"Ethics and compliance" (p.42) Cf.2019 Universal Registration Document - "3.8.6. Control and certifications" (p 111) Cf. ENGIE.com: control system
Annual Ethics Compliance procedure :	Cf.2020 Integrated Report - Ethics and
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 IT tool through which an annual report on the work and	compliance" (p.42) Cf.2019 Universal Registration Document -"3.8.6
progress made by the Group's entities in terms of implementing the ethics and	Control and certifications" (p111)



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compliance system (including the anti-corruption program) is reported by the Ethics	
& Compliance Officers to the Ethics, Compliance & Privacy Department	
("REPORT'ethics").	
The 2019 annual report has been submitted to the General Management Committee	
and the Ethics, Environment & Sustainable Development Committee of ENGIE Board	
of Directors.	
External certification:	Cf. 2020 Integrated Report - Ethics and
The Group is engaged in external audit processes of its ethics and compliance	compliance" (p.42)
system.	
- The Group anti-corruption system was certified by an external	Cf.2019 Universal Registration Document - "3.8.6"
organization in 2015.	Control and certifications" (p111)
- In 2018, the Group was awarded ISO 37001 certification in respect of its	
anti-corruption management systems by an external organization. In this context,	Cf. ENGIE.com : control system
certification control audits were carried out in 2019 and 2020 which confirmed the	
Group's ISO 37001 certification.	



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. 2020 Integrated Report pages 50-51
	Cf. ENGIE.com : The Group's contribution to the Sustainable Development Goals



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.	Cf. 2019 Universal Registration Document page 108 "3.6.3 Solidarity and combating fuel poverty"
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.	Cf. ENGIE.com: ENGIE foundation Cf. 2019 Universal Registration Document pages 108-109: « 3.6.4 ENGIE Corporate Foundation »
In 2018-2019, the ENGIE Foundation has financed 117 projects around its two main axes: integration for children and youth and access to sustainable energy and biodiversity. for approximately 485,000 beneficiaries.	Cf. ENGIE.com: ENGIE foundation 2018-2019 activity report
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	Cf. 2019 Universal Registration Document page 108: 3.6.3 Solidarity and combating fuel poverty
Through its Rassembleurs d'Energies initiative, ENGIE provides technical and financial support to social entrepreneur projects aiming to open up sustainable energy access to vulnerable populations worldwide.	Cf. ENGIE.com: energy access for all Cf. 2019 Universal Registration Document page 107: « 3.6.1 Socio-economic development in local communities » Cf. ENGIE Rassembleurs d'Energies
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. Thanks to donations from current and former Group employees, FAPE has already given its partner associations the means to finance over 93 integration projects	http://www.fape-engie.fr/en/ Cf.2019 Universal Registration Document page 81: Inclusion, job-seeking support and social solidarity Projects supported by FAPE



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.	https://www.engie.com/en/journalists/press- releases/industrial-issuers-26-billion-in-green- bonds-pledge-to-double-down-on-green- financing/ 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 attached document.	https://www.engie.com/sites/default/files/asset s/documents/2020-04/202004%20- %20Sustainability%20book.pdf#page=10
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. 2020 Integrated Report page 19: A detailed analysis of climate risks Cf. 2019 Universal Registration Document page 65: "3.1.3 Update on the work of the TCFD"

Criterion 18: The COP describes partnerships and collective action

Various partnerships and memberships have been concluded with national and	Cf.2020 Integrated Report pages 20-21 : Our
international bodies in support of ENGIE's environmental and social responsibility	other commitments
efforts.	



III. CSR corporate governance and leadership

Criterion 19: The COP describes CEO commitment and leadership

ENGIE supports the Global Compact	Cf. ENGIE.com: ENGIE supports the Global Compact
	Cf. ENGIE.com : Group's commitment

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	Cf. 2020 Integrated Report : CSR governance
Development Committee, the Group's Management Committee, and the Environmental and Social Responsibility Executive Committee.	Cf. ENGIE.com : Board committees
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	Cf. 2020 Integrated Report pages 34-35 : Strong involvement by Board Committees in 2019
employee. The Committee met four times in 2019, with an average attendance rate of 100%.	Cf. 2019 Universal Registration Document page 147: The Ethics, Environment and Sustainable Development Committee

Criterion 21: The COP describes stakeholder engagement

ENGIE's responsible growth strategy is anchored in stakeholder dialogue. The Group has set a target for 2020 : to set up a suitable mechanism for dialogue	Cf. 2019 Integrated Report : Our commitments p 28:
and consultation with stakeholders in 100% of its industrial activities. The result reached at the end of 2019 is 74%.	Cf. ENGIE.com: Societal
	Cf. 2020 Integrated Report page 14 : Our objectives
	Cf.2020 Integrated Report page 45 : A zero- carbon transition that benefits all our stakeholders