

Communication on Progress – ENGIE and Global Compact

Category Global Compact Advanced Company

September 2021

This document shows the correspondence between the information contained in <u>ENGIE 2021 Integrated Report</u> published in May 2021 and the 21 'GC Advanced' criteria of the Global Compact.

The following sources are also associated with the correspondence grid:

- the ENGIE 2020 Universal Registration Document published in March 2021
- 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?

2021 Integrated Report and 2020 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 2020 Universal Registration Document pages 115 to 118 and page 54 of the 2021 Integrated Report

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

<u>2021 Integrated Report</u> learns from the reference framework of the International Integrated Report Council. The Group published its first report in November 2014. The 2021 Integrated Report was published in May 2021 before the Group General Annual Meeting.



I. Implementing the ten principles into strategies and operations

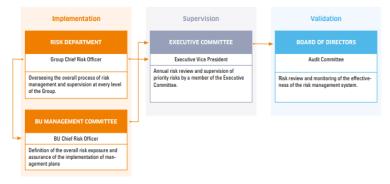
Criterion 1 : The COP describes mainstreaming into corporate functions and business units.

The Corporate Social Responsibility policy, updated in 2020, establishes the Group's CSR priorities and commitments, consistent with the Group's various policies **CSR Policy** (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 CSR governance within the ENGIE Group is carried out at the highest level of the company by the Ethics, Environment and Sustainable Development Committee of the Board of Directors, by the Group Executive Committee (EXCOM) and by the CSR Cf.2020 Universal Registration Document page 66: Executive Committee. « 3.1.1 CSR policy and governance » Cf ENGIE.com: Board committees CSR organization Validating the Group's level of CSR commitment Boosting the Group's CSR vision ork of CSR Ambassadors 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. Group Chief Ethics Compliance & Privacy Office Secretary General of the Group Ethics, Environment and Sustainable Development Committee Implementation and assessment of policies and procedures Annual activity report Annual activity report BU MANAGEMENT COMMITTEE Monitoring of changes to the Group's Ethics & Compliance system



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

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 open to all employees of the Group.

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

Cf. 2019 Universal Registration Document " 5.1.5.4 Green Bonds" pages 183 to 190

<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>: Contribution of funded projects to 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.

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 (Sciencebased 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 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

Cf. ENGIE procurement policy

Cf. 2020 Universal Registration Document pages 108-109 " 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 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 2021, the overall score of assessed suppliers is 54,3/100 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 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.

Cf.ENGIE.com: sustainable purchasing

Cf. 2021 Integrated Report : Medium and long-term value creation



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 2020, 15% of these suppliers met this target. Other management objectives are also implemented and concern: the CSR assessment of suppliers, payment terms and inclusive purchasing.	Cf. CSR Procurement objectives
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 2020, the training plan focused on: - supplier and subcontractor due diligence policy; - 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 online training sessions on ethics on 3 themes: - fraud and corruption; - our Group's zero tolerance policy - our ethical competition law.	Cf. 2020 Registration Document page 108 " 3.7 Purchasing, Subcontracting and Suppliers"
ENGIE has set up a supplier portal that enables innovative SMEs to publicise themselves and get included in ENGIE's supplier pool.	Cf.ENGIE.com



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. 2020 Integrated Report - "Ethics and compliance & Vigilance Plan" (p.42-43) Cf. 2020 Universal Registration Document - "3.8.3 Reference texts" (p.109) Cf. 2020 Universal Registration Document - "3.9 Vigilance plan" (p.111-114) 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.2020 Integrated Report- "Ethics and compliance & Vigilance Plan" (p 42-43)
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.2020 Universal Registration Document - "3.9 Vigilance plan" (p.111-114) 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.2020 Universal Registration Document - "3.9 Vigilance plan" (p.111-114)



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. ENGIE.com : vigilance plan Cf.2020 Universal Registration Document –
contractors, business consultants), in order to include the challenges related to the duty of vigilance.	"3.8.5 Training and awareness" (p 110)
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	Cf. ENGIE.com : The Group's human rights approach
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	Cf. ENGIE.com: The Group's integrity approach
ENGIE (which replaces an in-person training module offered via the association EDH ("companies for human rights") since many years) has been made available.	Cf. ENGIE.com: Mandatory ethics trainings
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.	
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.	Cf. 2020 Universal Registration Document - "3.9 Vigilance plan" (p.111-114)
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	Cf. ENGIE.com : The Group's human rights approach
proactive and global human rights approach. They are based on the United Nations Guiding Principles on business and human rights recommendations.	Cf. ENGIE.com : vigilance plan
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.	
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.

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

<u>Cf.2020 Universal Registration Document -"3.8.3</u> Reference texts" (p.109)

<u>Cf.2020 Universal Registration Document : « 3.9 Vigilance plan » (p 111-114)</u>

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 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

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

Cf.2020 Integrated Report : "An engaged Board" (p 35)

Cf.2020 Universal Registration document -"3.8.2 Risk assessment" (p.109)

Cf.2020 Universal Registration Document: "3.8.3 Reference texts" (p 109)

Cf.2020 Universal Registration Document: "3.9 Vigilance plan" (p 111-114)

<u>Cf; ENGIE.com : Ethics compliance referential:</u>
<u>"Ethics risks analysis"</u>

Cf. ENGIE.com : Due diligence

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

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

Cf. ENGIE;com: Vigilance plan
Cf.2020 Integrated Report - "Ethics and

compliance & Vigilance Plan" (p.42-43)

Cf.2020 Annual Registration Document - "3.8.3. Reference texts" (p.109)

<u>Cf.2020 Universal Registration Document : "3.9 Vigilance plan"(p 111-114)</u>



"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.

<u>Cf. ENGIE.com</u>: <u>Ethics compliance referential</u>: <u>"Ethics risks analysis"</u>

Since 2018, the ethical due diligence of new partners before any investment project incorporates human rights.

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.

<u>Cf. ENGIE.com : procurement policy</u> <u>https://www.engie.com/en/group/suppliers/sustainable-purchasing-policy</u>

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.

Cf. ENGIE.com : Integrity referential

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.

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

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.

<u>Cf.2020 Universal Registration Document : "3.7 Purchasing, subcontracting and Suppliers"(p</u> 108)

<u>Cf.2020 Universal Registration Document :</u>
"3.8.5 training and awareness" (p 110)

<u>Cf.2020 Universal Registration Document : "3.9 Vigilance plan" (p 111-114)</u>

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

Cf. ENGIE.com : Vigilance plan

Cf. ENGIE.com : Mandatory ethics training https://www.engie.com/en/group/ethics-and-compliance/policies-and-procedures/ethical-compliance-referential/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.

Cf.2020 Universal Registration Document -'3.8.5 Training and awareness' (p.110)

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.

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

An automatic reporting system for digital 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 180 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

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.

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

<u>Cf.2020 Universal Registration Document -"3.8.1</u> <u>Organization and structure" (p.109)</u>

<u>Cf.2019 Universal Registration Document "3.9</u> <u>Vigilance plan » (p111-114)</u>

Cf. ENGIE.com :ethics compliance referential: "
main parties involved in ethics compliance"

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

Cf. ENGIE.com: Vigilance plan



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	Cf.2020 Integrated Report : "Ethics and
& compliance processes of the Group : internal control system, audits, etc.	compliance & Vigilance Plan" (p 42-43)
Specific checkpoints relating to the deployment and implementation of the Human	
Rights referential and policy are integrated in the Group's internal control system	Cf.2020 Universal Registration Document -
since 2014.	"3.8.6. Controls and certifications" (p.110)
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.	Cf.2020 Universal Registration Document : "3.9
To ensure that the vigilance plan is implemented and to coordinate the various steps	Vigilance plan" (p 111-114)
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	Cf. ENGIE.com : Control system
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	Cf. ENGIE.com: The Group's human rights
the feedback of information for the Group's reporting requirements.	approach
	Cf. ENGIE.com : Vigilance plan
The Human Rights referential and policy as well as the Group's vigilance plan which	Cf.2020 Universal Registration Document: « 3.9

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" which replaces, since 2020, the "REPORT'ethics" tool): 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

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.

Committee of ENGIE's Board of Directors.

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" which replaces since 2020 the tool "INFORM'ethics") includes explicitly human rights incidents. In 2020, 283 managerial reports of ethics incidents were submitted, of which 37% pertained to the social responsibility and human rights domain.

3.9 Vigilance plan »(p 111-114)

Cf. ENGIE.com: Control system

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

Cf. ENGIE.com: Vigilance plan

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

Cf.2020 Universal Registration Document -"3.8.4. Whistleblowing and reporting of ethics incidents" (p.110)

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 participation to voluntary initiatives.	Cf.2020 Universal Registration Document: "3.9 Vigilance plan" (p 111-114)
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	Cf. ENGIE.com : The Group's human rights approach
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	Cf. ENGIE.com : vigilance plan
organizations.	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	Cf.2020 Universal Registration Document -
who feels affected by the activities of the Group.	"3.8.4. Whistleblowing and reporting of ethics incidents" (p.112)
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.	Cf.2020 Universal Registration Document : "3.9 Vigilance plan" (p 111-114)
	Cf. ENGIE.com : Whistleblowing system
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,	Cf. ENGIE.com : The Group's human rights approach
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 2020, 201 alerts, 35% of	Cf. ENGIE.com : Vigilance plan
which pertained to the social responsibility and human rights domain, were made in the framework of the ENGIE whistleblowing system.	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	Cf ENGIE.com : Social Dialogue Cf. 2020 Universal Registration document page 92 : « 3.4.5.6 Employee relations »
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.	
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 and 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.2021 Integrated Report page 47: "Health and safety: combining prevention, ambition and resilience"
The Group has its 2020 target, an internal occupational accident frequency rate of lower or equal to 3 (at 2015 scope)	Cf. 2020 Universal Registration Document page 17: « 1.5.2 2020 CSR targets »



The Group is committed to two new indicators by 2030:

- a frequency rate of accidents with lost time of Group employees and subcontractor

employees on closed sites ≤ 2.9 Results 2020: 2, 7: The effect of the health crisis on this result was marked particularly during the periods of confinement in the countries where the Group - the prevention rate, anindicator on the identification and anticipation of risks, thus promoting prevention. The goal is to have a prevention rate \geq 0.75 by 2030. • Results 2020 : 0,59 The Group is closely monitoring developments in the situation related to the Covid-19 Cf. 2020 Universal Registration Document page epidemic and is implementing the appropriate measures to prevent the contamination 94: « 3.4.8.2.2 The management of risks of its employees, subcontractors and customers depending on the state of arising from the Covid-19 pandemic » contamination of the various countries where it operates. A Group Covid-19 steering committee has been entrusted with the supervision of Cf. 2021 Integrated report page 47: "ENGIE ENGIE's actions. In addition, three specific committees have been created, including Care" one dedicated to the protection of individuals. This committee was responsible for drafting and adapting the general guidelines for the control of health risks as well as Cf. ENGIE.com: COVID-19 Mobilization various thematic guidelines. From the outset of the crisis, the Group decided to limit contamination as much as possible by to limit contamination as much as possible by drawing on external best practices. The Group called on a service provider specializing in health risk management in various The Group has called on a service provider specializing in health risk management in various territories to assist it in its decision-making. Measures to prevent the contamination of employees, subcontractors and clients have been applied, taking into account the state of contamination in the country. 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. The Group is engaged in the fight against discrimination. He is a signatory to the ILO Cf. 2020 Universal Registration Document page Global Business and Disability Charter in 2016, the Other Circle LGBT Engagement 91: « 3.4.4.3.3 LGBT+ (Lesbian, Gay, Bisexual, Charter in 2017 and the European Embrace Difference manifesto alongside 50 other Transgender/Transsexual plus) » major groups. as part of its participation in ERT (European Round Table of Cf. Global Business and Disability Charter Industrialists). ENGIE has adhered to the United Nations Women Empowerment Principles Cf. l'autre cercle LGBT Charter Cf. European manifesto « Embrace difference » In 2020, the Group's workforce gender diversity was 21.5%, up 0.6 points on 2019. Cf. 2020 Universal Registration Document pages 16-18 "1.5 CSR performance » However, this increase was still insufficient to achieve the initial 2020 target of 25%. Efforts to increase the gender mix in the Group's workforce will naturally continue with Cf. ENGIE.com the new 2030 target for gender diversity targeted at management management. 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 Results 2020 : 24,1% - have a 100% gender equity index for the entire Group • Results 2020 : France : 87 ; excluding France : 80 Engie works to promote diversity of business by raising awareness: "I learn Energy", « J'apprends l'énergie » "Elles bougent", "Girls and Boys day day. « Elles bougent »

Cf. 2020 Integrated Report page 61:

"Preserving health, safetyand security at work"



ENGIE is also tapping in the SME ecosystem to help increase the number of women	Cf. 2020 Universal Registration Document pages
in so-called "male professions" and the number of men in so-called "female	89 "3.4.4.1 Diversity and the commitment to
professions".	professional and pay equality between women
ENGIE obtained in 2017 the renewal of the diversity label for a four-year period for all	and men"
Group production and services activities in France.	
In 2019, the Group strengthened its commitment to youth employment by joining the	Global alliance for YOUth
global initiative Global Alliance For YOUth. The ambition of this expanded initiative is	Cf. 2020 Universal Registration Document page
to impact 6 million young people under 30 by 2022 to help them develop their future	87: "3.4.2.2 The employees' commitment to the
employability. ENGIE has set a goal of receiving 10% of work-study students in France	Group's strategy"
under 3 years and in Europe under 5 years.	
At the end of 2020, ENGIE had 5,961 apprentices, i.e. 7.1% of the workforce in France	
and 1% of the workforce in Europe. of the workforce in Europe.	
ENGIE has set up a scheme for forward-looking management of jobs and	Cf. 2020 Universal Registration Document pages
competencies, which is geared towards adjusting recruitment and helping	87-88 "3.4.3.3 Training, skills development, and
employees to adapt to the company's future needs. It has set up the "ENGIE Skills"	leadership "
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.	
In 2020, 70,1% of the Group's workforce took a training course.	



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.	Cf. 2020 Registration Document page 83 « 3.4.5 Employee relations »
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.	Cf. 2020 Universal Registration Document pages 86-88 "3.4.3 Human resources development and mobility policies"
	Cf. ENGIE.com: Social dialogue Cf. 2010 Universal Registration Document page 92 « 3.4.5 Remuneration, social protection, employee savings plans, and employee shareholding »
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.	Cf. 2020 Universal Registration Document page 87 " 3.4.3.3 Training, skills development, and leadership"
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.	Cf.2020 Universal Registration Document page 89 "3.4.4.1 Diversity and the commitment to professional and pay equality between women and men" 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 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	Cf. 2020 Universal Registration Document pages 90-91: "3.4.4.3 Diversity"



- to accompany and propose the necessary adjustments	
- to support changes in career paths	
- to develop purchases in the protected and adapted sector	
At the end of 2020, the Group in France had an employment rate of 3.7%	
ENGIE is actively involved in a number of projects that use sport as a driver and vector	Cf. 2020 Universal Registration Document page
for social and professional inclusion.	90: "3.4.4.2 Inclusion and job-seeking support""



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. 2020 Universal Registration Document page 94: "3.4.8.2 The health and safety management system"
ENGIE monitors its social responsibility efforts using a mechanism based on a	Cf. ENGIE.com : Note on the methodology of
number of quantified indicators, which are mentioned in its social reports, among	social indicators
other places. These help the Group to continuously improve its performance.	Cf. ENGIE.com : Social Reporting
ENGIE has adopted a social reporting method that has been checked against the	Cf Statutory auditors certification on CSR
AA1000 standards by its statutory auditors.	information published
, ,	Cf. Statutory auditors reasonable assurance on a
	selection of CSR information
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 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
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 CO ₂ eq in 2030 - 2020 results: 68 Mt CO ₂ eq - GHG emissions linked to the use of products sold, in line with the SBT trajectory, i.e. 52 Mt in 2030 - 2020 results: 62 Mt CO ₂ eq - Contribution to the decarbonization of our customers: 45 Mt CO ₂ eq avoided through the use of ENGIE products and services - 2020 results: 21 Mt CO ₂ eq - 100% of our preferred suppliers (excluding energy purchases) certified or aligned by the Science Based Targets initiative - 2020 results: 15%	Cf. CSR Policy: 2. Breakdown by policy and objective Cf. 2021 Integrated Report: Medium and long-term value creation
The Group has achieved its 2020 environmental targets: 25% of renewable energy in the production capacity mix in 2020: 2020 results: 31% -20% CO2 emission reduction rate for power generation compared with 2012: 2020 results: -52%	Cf.2020 Universal Registration Document pages 16-18 : 1.5 CSR performance
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	Cf. 2021 Integrated Report page 10 "Moving toward net zero carbon by 2045" 2021 Biodiversity Notebook



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.	
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	
ENGIE has drawn up a water management policy that is in step with the core elements	Cf. ENGIE.com : Water policy
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. CEO Water Mandate COP 2019
ENGIE places air pollution issues at the very heart of its strategies. The Group has	Cf. 2020 Universal Registration Document
taken a wide range of actions to cut emissions of pollutants such as SO2, NOx and	page 103 "3.5.4.7 : Atmospheric pollutants »
particulate matter.	
The ENGIE Group's Purchasing function has defined an ambition, one of the axes of	Cf.2020 Universal Registration Document
which is to contribute to the CSR approach and to the carbon neutrality of the Group.	page 108 : «3.7 Purchasing, Subcontracting
This is materialized in in its sustainable purchasing policy and in its three following	and Suppliers »
objectives for 2030:	Cf. ENGIE.com : Sustainable procurement
- 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	
In October 2017, ENGIE supported these recommendations with the climate leaders of	Cf. 2020 Universal Registration Document
the WEF (World Economic Forum) at the G20, and set up an internal cross-functional	page 65 : 3.1.3 Climate trajectory (related to
working group which defined a plan for implementation of the recommendations. A	the recommendations of the TCFD: Task
partnership with the IPSL (Institute Pierre Simon Laplace) was established, aiming to	Force on Climate-related Financial
identify the nature of the meteorological data likely to impact its facilities and to define	Disclosures Cf. 2021 Integrated Report page
the evolution curves for this data.	29 : Climate issues



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 Board of Directors.	Cf. ENGIE.com: CSR governance CSR Policy Environmental Policy CSR Governance Cf 2020 Universal Registration Document page 66: 3.1.3 Climate trajectory (related to the recommendations of the TCFD: Task Force on Climate-related Financial Disclosures)
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).	Cf. ENGIE.com : Note on the methodology of environmental indicators
Its environmental reporting has been checked against the AA1000 standards by its statutory auditors.	Cf. ENGIE.com : Statutory Auditors' Assurance 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
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. 2021 Integrated Report page 28: Ethics, Environment and Sustainable Development Committee Cf. 2020 Universal Registration Document page 145: «4.1.2.4.4 The Ethics, Environment and Sustainable Development Committee»
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	
Complaints and convictions related to environmental or health damage amounted to 6 and 2 respectively in 2020, resulting in compensation of €14k. In 2020, environmental expenses (investments and current operating expenses related to environmental preservation) amounted to related to the preservation of the environment) amount to more than 553 million.	Cf. 2020 Universal Registration Document - "3.5.4.9. Active prevention of environmental risks" (p.104)
ENGIE fills out the CDP's questionnaire every year. In 2020, 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-

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

Cf. 2020 Universal Registration Document -"3.8. Ethics, and compliance" (p.109)

<u>Cf. 2020 Universal Registration Document :</u>
"3.8.3 reference texts" (p 109)

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.2020 Universal Registration Document :</u>
"3.8.3 Reference texts" (p 109)

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 (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 Ethics charter, 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

Cf. ENGIE.com: Integrity referential

Cf. ENGIE.com : Codes of conduct



interest representation.

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 14-21)
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 investment 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.2020 Universal Registration Document- "3.8.2. Risk assessment" (p.109) 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 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 180 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. Since 2018, the Ethics, Compliance & Privacy Department is second to the implementation of a compliance procedure. The Group Ethics, Compliance and Privacy Department is thus responsible for personal data protection, export controls and embargoes, and	Cf.2020 Integrated Report: "Ethics and compliance" (p 42) Cf.2020 Integrated Report "an engaged Board" (p 35) Cf.2020 Universal Registration Document- "3.8.1 Ethics and compliance governance" (p 109) Cf.2020 Universal Registration Document: "Ethics, Environment and Sustainable Development Committee » (p 145)



The Ethics, Environment and Sustainable Development Committee met 4 times in 2020 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.2020 Universal Registration Document - "3.8.3. Reference texts" (p.109) 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 and employee training developed within the Group 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 2020. This training is also mandatory since 2016 for members of the ethics and compliance network, and strongly recommended for business developers. The training dedicated to the purchase line deployed in the Group since 2014 has been updated in 2016 and in 2019. Ethics training, including in particular on the prevention of and the fight against corruption, is available for all Group employees via training videos and e-learning modules. An automatic reporting system for digital 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	Cf.2020 Integrated Report : "Ethics and compliance" (p 42) Cf.2020 Universal Registration Document : "3.8.5 Training and awareness" (p 110) Cf. ENGIE.com : mandatory ethics trainings
Sustainable Development Committee of ENGIE Board of Directors.	
Initiatives The Crown is involved in accord multilateral international anti-parameters initiatives	Cf.2020 Universal Registration Document -
The Group is involved in several multilateral international anti-corruption initiatives, such as:	"Ethics, and compliance" (p 109)
- UN Convention against Corruption (UNCAC)	Cf. ENGIE.com :our standards and
- The OECD anti-corruption initiative	memberships
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	



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"</u> (p.42)

<u>Cf.2020 Universal Registration Document</u> - "3.8.6. Control and certifications" (p 111)

Cf. ENGIE.com: control system

Whistleblowing and reporting of 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. In 2020, 201 alerts, 21% 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 which replaces since 2020 the tool "INFORM'ethics"). In 2020, 283 managerial reports of ethics incidents were submitted. Integrity-related incidents were the most represented (54% 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 ENGIE Board of Directors

- <u>Cf. 2020 Integrated Report -"Ethics and</u> compliance" (p.42)
- Cf. 2020 Universal Registration Document "3.8.4. Whistleblowing and reporting of ethics incidents" (p.110)
- Cf. ENGIE.com : Ethical compliance system
- Cf. ENGIE.com : Whistleblowing system



Audit a	nd intarn	al control.

- 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"</u> (p.42)

<u>Cf.2020 Universal Registration Document -</u> <u>"3.8.6. Controls and certifications" (p 111)</u>

Cf. ENGIE.com: control system

Annual Ethics Compliance procedure:

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 » which replaces, since 2020, the tool "REPORT'ethics").

The 2020 annual report has been submitted to the General Management Committee and the Ethics, Environment & Sustainable Development Committee of ENGIE Board of Directors.

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

<u>Cf.2020 Universal Registration Document -"3.8.6</u> <u>Controls and certifications" (p111)</u>

External certification:

The Group is engaged in external audit processes of its ethics and compliance system.

- The Group anti-corruption system was certified by an external organization in 2015.
- In 2018, the Group was awarded ISO 37001 certification in respect of its antibribery 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 EuroCompliance, a certification agency specialized in the certification of corruption prevention programs. The group level was audited in June and July 2021 and was awarded a new ISO 37001 certificate. ENGIE's operational level audit is scheduled for the second semester of 2021.

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

Cf.2020 Universal Registration Document - "3.8.6" Controls and certifications" (p111)

Cf. ENGIE.com : control system



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. 2021 Integrated Report pages 38-39
	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. 2020 Universal Registration Document page 106 "3.6.2.1 Fuel poverty of individual customers"
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. 2020 Universal Registration Document page 107: « 3.6.2.3 ENGIE Corporate Foundation »
In 2020, the ENGIE Foundation has financed 120 projects around its two main axes: integration for children and youth and access to sustainable energy and biodiversity. for approximately 480,000 beneficiaries.	Cf. ENGIE.com: ENGIE foundation 2020-2021 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.	Energy assistance
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 2020, the 19 companies in the portfolio operating on four continents have enabled the clean and affordable electrification of more than 5.5 million beneficiaries worldwide world.	Cf. 2020 Universal Registration Document page 106: « 3.6.2.2 The environmental and social fund "ENGIE Rassembleurs d'Énergies" » 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. Since its creation in 2013, FAPE (France and Belgium) has provided more than 1.7 million euros in grants to 150 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.	Cf. ENGIE.com



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
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.	ENGIE Impact 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.	Main Group's commitments
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. 2021 Integrated Report page 29: "Climate issues " Cf. 2020 Universal Registration Document page 65: 3.1.3 "Climate trajectory (related to the recommendations of the TCFD: Task Force on Climate-related Financial Disclosures) "
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.	Cf. 2021 Integrated Report page 29: "Climate issues " Cf. 2020 Universal Registration Document
The Group has obtained SBT certification.	"3.1.4 Science Based Targets certification and carbon neutrality"

Criterion 18: The COP describes partnerships and collective action

Various partnerships and memberships have been concluded with national and	Cf.2021 Integrated Report pages 14 : 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	Cf 2020 Universal Registration Document 3.1.1
the ENGIE Group: by the Board of Directors' Ethics, Environment and Sustainable	"CSR policy and governance" page 68
Development Committee, the Group's Management Committee, and the	Cf. ENGIE.com : Board committees
Environmental and Social Responsibility Executive Committee.	
The Ethics, Environment and Sustainable Development Committee oversees	Cf. 2021 Integrated Report pages 28-29: Ethics,
compliance with both the individual and collective values on which the Group's	Environment and sustainable development
actions are based and with the rules of conduct that must be applied by every	Committee
employee. The Committee met four times in 2019, with an average attendance rate	
of 100%.	Cf. 2020 Universal Registration Document pages
	145-146: 4.1.2.4.4 « The Ethics, Environment
	and Sustainable Development Committee »

Criterion 21: The COP describes stakeholder engagement

ENGIE's responsible growth strategy is anchored in stakeholder dialogue.	Cf. 2021 Integrated Report : "Being a responsible
The Group set a target for 2020 : to set up a suitable mechanism for dialogue and	player " p 48-49:
consultation with stakeholders in 100% of its industrial activities. This target was	
achieved at end of 2020 .	
The year 2020 was marked by the establishment of two forums for dialogue: a	Cf. 2020 Universal Registration Document 3.6.1
Stakeholder Committee in charge of challenging the Group's strategy, and an access	"Dialogue with stakeholders and partnerships"
space made up of members of civil society, companies and local authorities,	page 106
responsible for supporting sensitive projects. These committees met for the first time	
in 2021.	Cf. 2020 Universal Registration Document 3.6.3
The adaptation of the Group's business model cannot be done without taking into	"Just transition" page 107
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.	