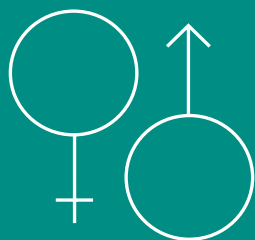


PRACTICAL GUIDE

# SEXUAL HARASSMENT & SEXIST ACTS



# FORE- WORD FORE- WORD FORE- WORD FORE- WORD



**As a leader in its field, ENGIE is committed to building a sustainable energy future for all. To achieve this future together, here at ENGIE we favour diversity and inclusion. The diversity of our teams and of their points of view are vectors for innovation and performance. The company must be a place where everyone feels protected, free to express what he or she is, regardless of their differences, without fear for their career or for their physical or psychic integrity.**

The existence of situations of sexual harassment and sexist acts is no longer acceptable within our Group.

This is why our Executive Committee wishes to restate its zero tolerance position, and this around the world.

This is because preventing and combating all forms of discrimination, violence and harassment, are at the heart of the Group's identity and part of the ENGIE Ethics Charter.

This commitment is fully a part of the Group's vigilance approach and its fundamental purpose. It further includes the stipulations of the European Group Agreement on improving the quality of life at work and ENGIE's health and safety policy. Protecting the well being and the quality of life of employees is further set out in the "No Mind At Risk" ambition stated in the Group's 2021/2025 health and safety action plan.

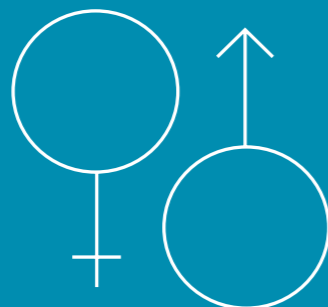
This strong Group commitment is now put into practice by making available the Sexual harassment and sexist acts practical guide. Creating the conditions for speaking out so that every talent and every expertise can live and work together within the Group and change the culture at ENGIE: that is our shared responsibility!

**Claire Waysand**

Executive Vice President -  
General Secretary, in charge  
of Strategy, Research, Innovation  
and Communication

**Jean-Sébastien Blanc**

Executive Vice President  
in charge of Human Resources  
and Corporate affairs



ENGIE Group HR

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# SEXUAL HARASSMENT & SEXIST ACTS ○ 1

# WHY PRODUCE AN ENTIRE GUIDE

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**This guide is primarily aimed at the Human Resources and Ethics departments in every country where the Group operates (or at every Regional Hub when the country does not have the resources or the means to deploy this guide).**

---

# THE AIM IS A TWO-FOLD ONE:

## PROPOSING

Sharing recommendations, solutions or guidelines to support countries or entities that have not yet implemented policies to combat sexual harassment and sexist acts.

## ALIGNING

Proposing, for those who have already implemented procedures, a common definition of these behaviours and a methodology for undertaking investigations into this very sensitive subject.

This guide is not intended to replace any policies or procedures that already exist and are applied in the countries or Regional Hubs.

**It should be used as a practical tool. At this stage and given the diversity of cultural norms and legal frameworks, every country is free to organise how it is implemented locally.**

When the countries or Regional Hubs have been able to implement the main principles of this guide and promote them, and to apply the principles relating to investigations, the Group Human Resources Ethics, Compliance and Privacy department will hold joint working sessions with "sexism referents" that may be designated by the countries/Regional Hubs (Appendix 3).



# DEFINITIONS & KEY FIGURES ○2

## DEFINITIONS & KEY FIGURES

As our Group operates in many countries with different laws and cultures, it is not easy to set out common definitions.

**It is essential to note that these definitions are given as an indication only, and that any legal requirement that applies in a given country takes precedent.**

BETTER  
UNDERSTANDING  
ACT   
BETTER 

## SEXUAL HARASSMENT

There is no international definition of sexual harassment and the only definition that we can use for inspiration is that of Article 1 of the Violence and Harassment Convention, 2019 (No. 190) of the International Labour Organization. Given the general nature of this definition, the following definition is proposed:

**Sexual harassment is characterised by, repeatedly, subjecting one or more people to words or behaviour that are sexual or sexist in nature and that affect the person's dignity due to their degrading or humiliating nature. This may occur at work or outside of it.**

Some examples:

- **Using familiar language every morning to female co-workers**, so that the victim suffers condescending paternalism ("hey beautiful", "pretty miss", etc.)
- **Making daily jokes about a co-worker's sexual orientation** ("you don't look gay", "I've nothing against gays but...")
- **Regularly placing works or articles of a sexual nature or that have sexual content on a co-worker's desk**, making comments about them, offering invitations or making sexual proposals sometimes accompanied by improper gestures
- **Eyeing a female intern from feet to waste** every day with an approving and libidinous look

## SEXIST ACTS

Sexist acts comprise all speech and actions that are denigrating and based on a person's gender or sexuality. This may range from behaviour that reinforces stereotypes that impact the person's dignity or the actual or imagined group that they belong to.

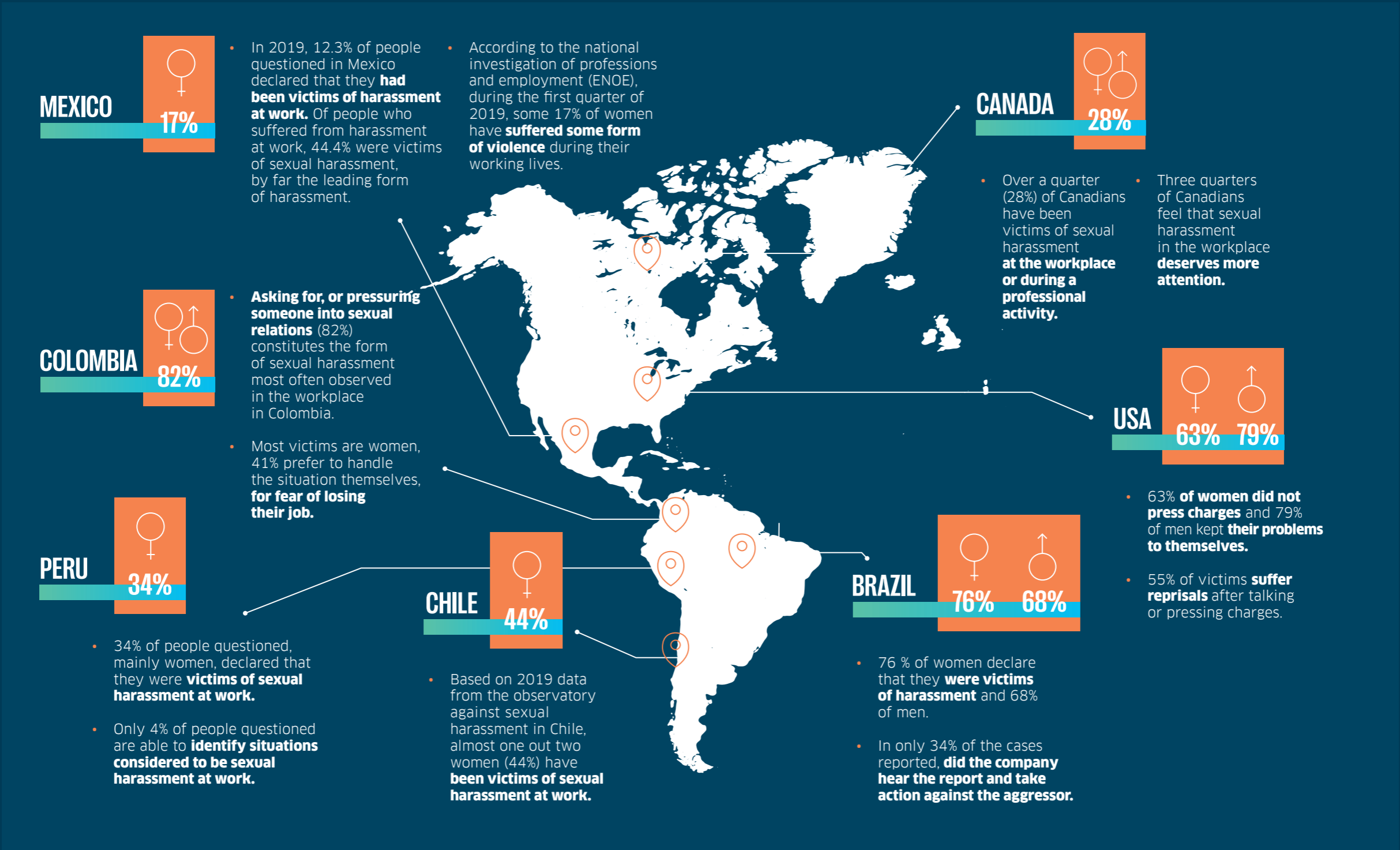
**Cases of sexual harassment are distinguished by whether or not they are repeated. They still remain unacceptable practices.**

Some examples:

- **Criticising a woman because she does not dress in a way that is feminine enough or man for not dressing like a real man**
- **Making a comment on motherhood or family commitments to a woman**, raising a potential for not being available or committed enough
- **Telling a woman that she only got a job** thanks to her looks or because she used sex to get ahead
- **Reproaching women for "acting like men" and men for "acting like women"**
- **Flattering the executive assistant** and acting like you have an intimate relationship with her in front of witnesses
- **During an annual review, saying "that's a great review and we haven't even had sex"**

The examples above may change category (from sexist acts to sexual harassment) if local law uses a different definition. It is important to note that if a third party from outside the company is a victim, witness or person involved in sexist acts or in sexual harassment at our offices or in any other professional environment with a link to our Group (e.g. customer facility, worksite, etc.), we recommend informing the third party's management so that they can take appropriate measures.

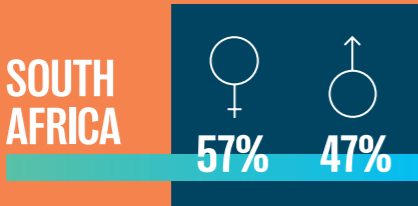
KEY FIGURES



KEY FIGURES



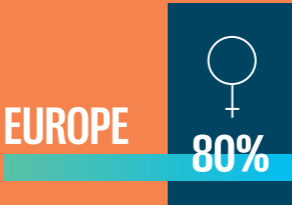
- In 2018, nearly 40% of women were victims of **physical violence in the workplace**, compared with some 60% who claim to have been victims of sexual harassment **by their superiors, male co-workers and sometimes even clients.**



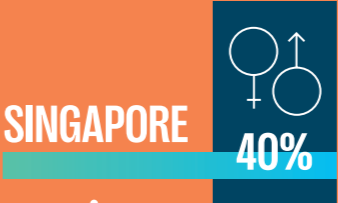
- Some 57% of women and 47% of men claim that **unsolicited advances** came from peer in the workplace, while 26% of women declared **that a boss or superior was the harasser.**

\* Contraction of "Man" and "Interrupting", defined as the act by a man explaining something to a woman assuming from the outset that he holds the knowledge while she is ignorant

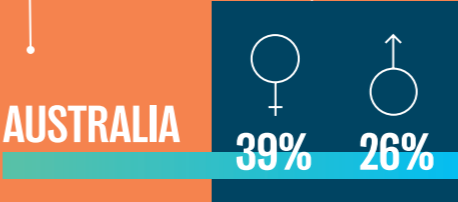
\*\* Contraction of "Man" and "Explaining", that designates behaviour where a man interrupts a woman during discussions or debates just because of her gender



- Six Europeans out of ten have at one time during their professional career, **been faced with sexist or sexual violence.**
- 80% of women feel that they have been **confronted with "manplaining"\*** and **"maninterrupting"\*** in the workplace.



- Two out of every five people questioned declared that they were **victims of harassment.**
- In approximately 40% of cases, **the harasser was reassigned or let go.**



- Almost two out of five women (39%) and one in four men (26%) declared that they had been **victims of sexual harassment in the workplace** during the five previous years.
- One in five people who filed a report of an official complaint were classed as troublemakers (19%), and were **ostracised, victimised or cold shouldered by co-workers** (18%) **or quit their job** (17%).



AND

IN PRACTICE? ○ 3

## IN PRACTICE?

**Whether we are in HR, an Ethics Officer, a Manager, a witness or a victim, we can do two things: prevent and act.**

As part of the Group's general health and safety commitment to staff, management plays a key role in risk prevention.



**PREVENTING  
&  ACTING**

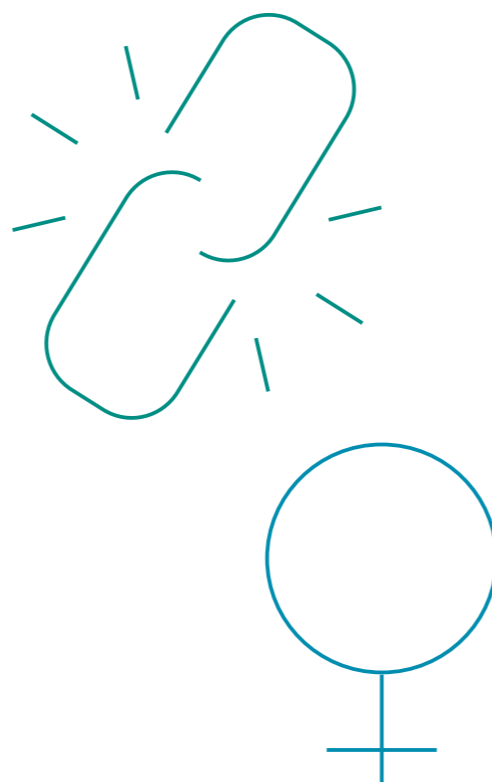
**At this stage in implementing the guide, we recommend that local HR and Ethics Officers, under country management, or failing this, relevant Regional Hub supervision, implement the following actions:**

## PREVENTING

An upstream effort on the working environment and changing mindsets is how sexist acts and sexual harassment are prevented. To achieve this, actions can be taken:

- **Raising staff awareness**  
(this awareness may come in various forms such as: memos, emails, posters, etc.)
- **Training management**  
who play a central role in fighting sexual harassment and sexist acts. This is a vital link in deploying a prevention policy and in detecting sexual harassment and sexist acts
- **Building internal and external communication that is devoid of gender stereotypes**
- **Proceeding with regular assessments**  
of how the issue is perceived by staff (barometer, investigations, etc.)

A "Sexism Referent" may also be designated. They will then become one of the key players in the approach, with the assignment of repeatedly informing all staff members of the mechanism put into place and the recourse available to them, directing people involved to the right contacts and supporting the people involved from the time their statement is collected until the matter is closed.



The "Sexism Referent" may also take part in the recurring workshops held on the subject by the Human Resources department and the Corporate Ethics, Compliance and Privacy department.

## ACTING

Whether a witness or a victim of sexual harassment or sexist acts, it is important to act quickly. A number of solutions exist:

- **Report what happened**  
You can make a report in French, English, Spanish or Portuguese. Messages written in other languages may be translated.
- The contacts are:  
**ethics@engie.com / 00 800 2348 2348**  
The confidentiality of any information collected must be guaranteed by the holders of this information. Alerts may be anonymous.
- **Be sure to react to reports**  
of sexual harassment or sexist acts
- **Ensure that investigations are always conducted** if a report is received
- **Ensure that sanctions** are taken against the perpetrator if the investigation proves their responsibility
- **Take charge of victims and follow-up matters over time**



# INITIATING & UNDERTAKING AN INVESTIGATION

○ 4

## STARTING & UNDERTAKING AN INVESTIGATION

**This part of the guide puts forward some principles to comply with when conducting an investigation into a potential case of sexual harassment or sexist acts.**

It is not intended to replace the guide on internal investigations prepared by the Ethics, Compliance & Privacy department.



# BASIC PRINCIPLES



## WHO RUNS THE INVESTIGATION?

The country Ethics Officer or ENGIE's Ethics, Compliance & Privacy department, depending on the person involved. This investigation may also be entrusted to an outside contractor.

The ongoing incident and investigation must be reported in MY ETHICS' INCIDENTS (using the COMMONETHICS software accessible to all Ethics Officers).

The corresponding country or Regional Hub must react to every report of sexual harassment or sexist acts. Regardless of who the person implicated is (the person claiming to be the presumed victim, a witness, staff representative, etc.) and regardless of the form that it takes (letter, verbal report, internal ethics alert, etc.), any report relating to a case of sexual harassment or sexist acts must be investigated.

## WHAT ARE THE STEPS IN THE INVESTIGATION?

### STEP 1 THE MAIN LINES

Investigations for cases of sexual harassment or sexist acts are always extremely sensitive investigations.

Although this guide is intended only to be educational, we ask HR and Ethics Officers to respect and guarantee a number of principles that are also set out in the guide on internal investigations produced by the Ethics, Compliance & Privacy department, such as (and this is a non-exhaustive list):

- **Informing the person implicated of their rights**
- **Ensuring the confidentiality of any information collected**
- **Ensuring the benefit, for any one involved of an impartial hearing as well as objective and equitable treatment**
- **Respect presumed innocence for anyone implicated**
- **Never confront the person presenting themselves as the person involved and the person implicated**
- **Never conduct a hearing alone (two people will always be present)**

## STEP 2

# COLLECTING THE FACTS

The investigator (who will be the country Ethics Officer or the Ethics, Compliance & Privacy department) must be accompanied by another person of their choice when conducting the interviews so that at least two persons are present (from the legal, HR department, etc.).

They will need to determine the reality of the alleged events (listening to the testimony of the persons involved – the person presenting themselves as the "alleged victim", the one or more people implicated as the alleged author, direct or indirect witnesses, etc.). The investigator must remain neutral in their attitude, in what they say and never judge what is reported to them while leaving people free to express themselves at their own speed.

If during the investigation any elements tend to confirm the harassment, then suspending the perpetrator for a conservatory period may be envisaged for the duration of the investigation. If not, prefer simple solutions to limit any contacts with the person implicated and their supporters and protect the person presenting themselves as the alleged victim (e.g. from any risk of pressure, threats, psychosocial hazards, etc.).

The primary responsibility of the top manager in the country or the Regional Hub is to stop any proven harassment. Victims who are recognised as such must also be informed that they can, in parallel, start legal proceedings against the person they are accusing before the relevant jurisdictions.

**If no local law sanctions this kind of behaviour in the country where the sexual harassment or the sexist acts took place, the victim must be aware that from the moment that any such acts are evidenced, their perpetrators will be sanctioned by ENGIE as a violation of the Group's values and ethics principles.**

## STEP 3

# PRODUCING AN INVESTIGATION REPORT

We recommend writing factual reports immediately after the interviews, and this throughout the investigation. It must be possible to chronologically track the events. Where applicable, retain all kinds of proof, in line with local law, then write an investigation report signed by the investigators.

If after the investigations, the witness statement diverge, are vague or if the facts are not evidenced, then inform the person presenting themselves as the alleged victim and ensure that they, and anyone who in good faith contributed to the investigation will be protected from any form of reprisals. On the other hand, they will also be informed of the risk of disciplinary action faced if they are found to have acted in bad faith.

## STEP 4

# IF THE ACCUSATIONS ARE TRUE

If the investigation confirms the existence of a case of sexual harassment or sexist acts, it is necessary:

- **To take disciplinary action against the staff member found to be the perpetrator of sexual harassment or sexist acts; every country organisation will take the disciplinary sanctions suited to their legal environment**
- **To, where necessary, see that the alleged victim is accompanied by health or social services, or by outside organisations so that they benefit from psychological support**
- **To implement measures to ensure that the alleged victim can continue their professional life. This protective measure is necessary to combat any retortion where events have been reported in good faith**

## STEP 5

# CONDITIONS FOR KEEPING AND ARCHIVING DOCUMENTS

- **The period for retaining documents must meet local requirements**
- **Staff from Human Resources at the entities and from the Corporate departments in charge of hiring will ensure that any collection and processing of personal data as part of the implementation of this policy will be compliant with applicable regulations (GDPR, national laws) as well as the Group policy in terms of protecting personal data and, where applicable that of the GBU or the entity**
- **Reports must be recorded in the My ETHICS' INCIDENTStool or any other equivalent software benefitting from the same protection (the COMMONETHIC tool accessible to all Ethics Officers)**



KEY

FIGURES ○ 5

## KEY RESOURCES

### CONTACTS

Any report can be made in French, English, Spanish or Portuguese. Messages written in other languages may be translated.

The confidentiality of any information collected must be guaranteed by the holders of this information. Alerts may be anonymous.

ETHICS  
**@ENGIE.COM**

00 800 2348 2348



YOUR MEMO  
FOR  
ACTING



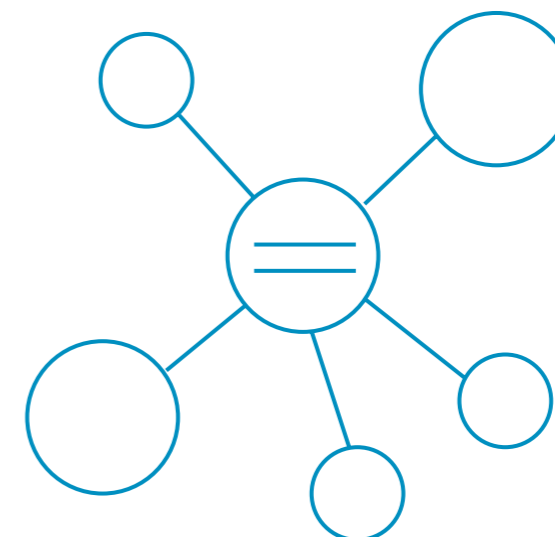
## KEY PREVENTION ELEMENTS

- **Make staff aware of the issue**
- **Train managers**
- **Building internal and external communication that is devoid of gender stereotypes**
- **Ensure that the reporting works properly**
- **Run regular assessment**
- **Designate a "Sexism Referent"**



## KEY ACTION ELEMENTS

- **Report what happened** (contact above)
- **Be sure to react to reports of sexual harassment or sexist acts**
- **Ensure that investigations are always conducted if a report is received**
- **Ensure that sanctions are taken against the perpetrator if the investigation proves their responsibility**
- **Take charge of victims and follow-up matters over time**
- **Organise systematic debriefings with the parties involved in the report**



## THE KEY ELEMENTS IN AN INVESTIGATION

- **Collecting the facts**
- **Produce an investigation report**
- **If the accusations are true:**
  - To take disciplinary action against the staff member found to be the perpetrator of sexual harassment or sexist acts
  - Where necessary, see that the alleged victim is accompanied by health or social services, or by outside organisations so that they benefit from psychological support
  - Implement measures to ensure that the alleged victim can continue their professional life



# APPENDIX

## SUGGESTED ASSIGNMENT FOR THE SEXISM REFERENT AND CRITERIA FOR DESIGNATING THEM

### Suggested assignments:

**1. Informing:** in liaison with the HR and/or Ethics department, ensuring that you comply with your requirement to inform all staff members within your perimeter is complied with:

- Allowing the display of legal documents, where there are any, and lists of possible recourse, using the intranet, posters, handing out brochures, etc.
- Informing and raising awareness among managers and staff: you can contribute, in liaison with the actions undertaken by the HR department, to changing mentalities in your field to guarantee an untroubled working environment, especially by proposing communication and awareness actions to staff.

**2. Orienting:** first of all, your role will be to listen to a person who asks you for a hearing, to collect the facts as reported in a neutral and caring way and to reorient them towards the most suitable resource especially the country Ethics Officer or the Regional Hub (who will be tasked with performing the investigation), making allowance for the seriousness, the urgency and the nature of their request. Possible resources available to complete your action include managers, HR, other members of the ethics branch, workplace healthcare, social support department, preventers (this is a non-exhaustive list to be adapted to the local context). You must further inform the person that there is confidential and anonymous ethics alert line. You also need to always respect the staff member's anonymity, unless they allow you to lift it. In all cases, you will need to commit to a reinforced requirement for confidentiality.

**3. Accompanying:** You will also need to conduct whatever follow-up is required with the alleged victim. You can intervene to support those responsible for sexist behaviour as well as victims when they ask for your help, taking care to remind them of the commitments made by the company in favour of a working environment that ensures respect for all.

### Suggested designation criteria:

The "sexism" referent must be chosen with care for they may be exposed to sensitive situations:

- They must be committed and ready to take on this role
- Their reputation must be beyond reproach
- They need to have a high enough level where they are recognised by management and the wider organisation
- They must naturally show empathy and openness
- They must be able to ensure the confidentiality of anything entrusted to them
- They must be fast reacting
- They must not show any fragility of their own when they taken on the role
- They may be chosen from HR or from ethics or from the business or operations sides.
- They will sign an assignment letter as soon as they take on the job.



# APPENDIX



**ETHICS@ENGIE.COM**

**00 800 2348 2348**

