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Presentation of the integrity referential

Integrity is one of the 4 fundamental principles on which ENGIE has based its ethics and compliance policy.

The integrity referential serves as a framework for implementing the principle of “behaving honestly and promoting a culture of integrity”. It gathers together the policies and procedures dedicated to the prevention of fraud, corruption and influence peddling.

The ENGIE anti-corruption policies are part of the Group’s corruption prevention actions. They apply to employees from all Group entities, business consultants, industrial and financial partners, subcontractors and suppliers, and to partners in patronage and sponsorship projects.

These ENGIE’s anti-corruption policies and procedures reflect the Group’s ambition to follow for its actions in the highest international standards of ethics and compliance, such as the UN convention against corruption and the OECD Guidelines for Multinational Enterprises. The Group, which is in particular subject to the UKBA, the US FCPA, and the French Sapin 2 law, has shaped its policies with respect to the prevention of corruption to the rules promulgated.

The Group has also taken a voluntary commitment beyond the regulatory framework, by joining the United Nations Global Compact – the 10th principle of which relates to combating corruption – and the French section of the Transparency International NGO, organization of civil society dedicated to the fight against corruption.

To date, the integrity referential gathers the following policies and procedures, presented on ENGIE website:

- Business consultant policy
- Gift, hospitality & technical trip policy
- Ethics, environmental and societal responsibility clause
- Due diligence policy on partners related to investment projects
- Due diligence policy in the context of patronage and sponsorships
- Due diligence policy for suppliers and subcontractors
- Note on ethics due diligence for external/internal recruitment of persons most exposed to ethics risk
- Policy for the prevention of conflicts of interests

The code of conduct on lobbying and the code of conduct in supplier relations also contribute to the Group culture of integrity.

Other elements contributing to the compliance program and to integrity are presented in the Ethics compliance referential: main parties involved in integrity, mandatory analysis of corruption risks, policies and procedures gathered in the ethics compliance referential (amongst which: the Group whistleblowing system and the Group Ethics & Compliance training plan), managerial reporting (My Ethics Incident) and treatment of fraud and corruption incidents, control system, external certification of the anti-corruption program.