UNIVERSAL REGISTRATION DOCUMENT 2022

Including annual financial report



3.9 VIGILANCE PLAN

In accordance with Law 2017-399 of March 27, 2017, this section summarizes the broad strokes of the Group's vigilance plan. A developed version of the vigilance plan, its progress report, as well as details of the policies and actions are available on the ENGIE's website:



The plan covers all the measures established by ENGIE SA to prevent risks related to its activities and those of its controlled companies. It covers serious violations relating to human rights and fundamental freedoms, the health and safety of individuals and the environment. The Group's adherence to international standards is the minimum basis for commitments that the Group intends to apply wherever it operates. These measures and the common whistleblowing system have already been in use for several years. Completely integrated to the ethics organization, the vigilance plan benefits from steering, governance and dedicated monitoring (see Section 3.9.5).

4 VIGILANCE APPROACHES

Risk identification and management (activities, projects, etc.)

MANAGEMENT ENTRUSTED TO THE ETHICS, COMPLIANCE & PRIVACY DEPARTMENT

| HUMAN RIGHTS APPROACH | AND SOCIETAL SECURITY | | VIGILANCE MONITORII COMMITTEE | |
|---|----------------------------------|---|--|--|
| Human rights policy Ethics, Compliance & Privacy Department | CSR policy CSR Department | Health and Safety - Security policies Health and Safety - Security Departments | ASSOCIATION OF STAKEHOLDERS Global Agreement, European Works Council. | |
| PURCHASING APPROACH | Procurement Charter | Procurement Department | stakeholder committees, etc. | |
| Qui | | ES, SUPPLIERS, SUBCONTRACTORS | cies | |
| | WHISTLEBLOWING A | ND COLLECTION OF ALERTS | | |
| | | TO COLLECTION OF ALLING | | |
| | ENGIE whistleblowing | ng system, ad hoc systems | | |
| | | ng system, ad hoc systems — | | |
| MONIT | ORING OF EFFECTIVE ROLL-OUT | | | |

3.9.1 IDENTIFICATION AND MANAGEMENT OF THE RISKS OF SERIOUS HARM TO INDIVIDUALS AND THE ENVIRONMENT

The Group exercises vigilance through policies that cover all issues and procedures relating to the identification and assessment of risks. Goals and follow-up and assessment processes are put in place on the basis of these procedures.

3.9.1.1 Prevent and manage the risks related to human rights

ENGIE's Ethics, Compliance & Privacy Department, attached to the Legal, Ethics and Compliance Department, itself under the authority of the Corporate Secretariat, is directly responsible for the legal rights component of the vigilance plan. It relies on its network of Ethics and Compliance Officers and ethics correspondents located across the world and on other departments concerned by human rights aspects (see Section 3.8.1).

The major risks of negative impacts on the human rights of any individual due to the Group's activities are related to the fundamental rights of workers. More generally, challenges relating to human rights for the Group are as follows:

| EMPLOYEES' | RIGHTS OF LOCAL | SUBCONTRACTORS / SUPPLIERS / |
|--|---|--|
| FUNDAMENTAL RIGHTS | COMMUNITIES | PARTNERS |
| Health and safety conditions Freedom of association Non-discrimination Fight against forced labor Working hours Housing conditions of workers Private life | Health of surrounding populations Living conditions of surrounding populations (food, water, housing, culture, access to resources, etc.) and the right to a healthy environment Rehousing of populations Fight against the suppression of the Group's opponents | Work and health and safety conditions of subcontractors Energy supply Traceability and supply of materials used for the Group's products and services Best practices of commercial partners in projects |

SAFETY CONDITIONS FOR EMPLOYEES AND SITES

- Best practices of private or public security forces in the performance of their security mission, and notably practices relating to the use of force
- Security conditions of employees in at-risk countries

Details regarding risks are available on ENGIE's website at the following address: www.engie.com/en/group/ethics-and-compliance/policies-and-procedures/human-rights-referential.

The Group's human rights policy, adopted in 2014 and constantly evolving, specifies the Group's commitments and provides for regular processes to identify and manage risks. In particular, every year, the entities must assess their activities with regard to their impact on human rights, via a dedicated self-diagnostic scorecard (see Section 3.8.2). They must also assess any new business activity via a dedicated scorecard designed to identify the risk factors specific to the planned activity.

Risks are assessed by country, the presence of subcontracting, business, characteristics relating to workers, the presence of populations where risk is heightened if they are vulnerable, the products/services used, use of armed security forces, and the type of sales relations. The assessment of third parties (suppliers, subcontractors, partners, contractors, etc.) explicitly including human rights (see Section 3.9.3) as well as the whistleblowing system (see Section 3.9.4), is also used to identify risks.

The entities in two major regions, South America (SOUTHAM) and Asia - Middle East - Africa (AMEA), along with Global Energy Management & Sales (GEMS) and Tractebel, saw a change in risk levels relating to human rights, either because of their country of activity or the sector in which they do business (gross risk). At the operational level, the specific risks identified are the subject of specific action plans described on the aforementioned website.

In 2022, the Group continued its enhanced vigilance actions, which were introduced in 2020, to identify and manage the practical risks of forced labor practices in the Group's Chinese supply chains (see Section 2.2.5.3).

The Group began to roll out an action plan in one of its entities in 2022, targeting ENGIE's customer relation centers located abroad, aimed at assessing the actual working conditions of workers and this, in consultation with them.

A face-to-face training course on the Group's human rights approach was developed in 2019 and particularly targets operational collaborators and managers directly concerned by this topic. In 2022, individuals in positions particularly exposed to human rights risks were identified and a specifically dedicated training plan was launched. An elearning module on human rights for all employees has been also in use for several years now.

The monitoring of the application of these processes is incorporated into the ethics compliance report (quantitative indicators) and into the internal control system (see Section 3.8.6).

| 1,523 employees trained in person on human rights, around 55% of whom were operational functions, and half of these from at-risk entities, and 13,050 employees trained by e-learning (decrease in this figure compared with 2021 due to the disposal of EQUANS). |
|---|
| 82.4% of the Group's entities assessed the roll-out of the vigilance plan at their level as effective $^{(1)}$. |
| 96.2% of the entities that assessed the roll-out of the human rights policy considered it to be effective ⁽¹⁾ . |
| 95%: Coverage of the annual human rights risk sheet. |
| 100%: Number of due diligence procedures (with human rights risk) on partners in the context of the Group's investment committees |
| |

(1) Maximum level 4 according to the internal control standards.

In 2022, ENGIE signed a new global agreement relating to fundamental social rights and social responsibility. The agreement also includes a monitoring of commitments:

| Group commitments | Monitoring (2022 figures) |
|--|---|
| ENGIE Care program | 66.5% of entities: fully paid maternity leave (14 weeks) |
| (minimum level of social | 27.7% of entities: fully paid paternity leave (4 weeks) |
| protection for all employees | 94.6% of employees: 12 months' gross salary paid in the event of death |
| worldwide) | 97.2% of employees: health care plan with 75% of hospital costs covered |
| | 79.2% of employees: 12 months' gross salary paid in the event of permanent disability |
| Gender diversity: 50% of female managers | 30%: percentage of female managers |
| Equal pay between men and women | 1.73%: pay difference between men and women |

3.9.1.2 Prevent and manage risks related to health and safety in the workplace

The mapping of risks relating to health and safety includes both risks of harm to the health and safety of people working for the Group (employees, temporary workers, subcontractors, interns) and risks relating to industrial facilities that are owned by the Group or maintained and / or operated by the Group for customers, which could generate risks for people working for the Group or for neighbors of these industrial facilities. These different risks correspond to three axis of prevention, No Life at Risk (safety at work), No Mind at Risk (well-being at work) and No Asset at Risk (process safety).

MAPPING OF HEALTH AND SAFETY AND PROCESS SAFETY RISKS

| RISKS TO PERSONAL HEALTH AND SAFETY | | | | | |
|--|---|--|--|--|--|
| OCCUPATIONAL ACCIDENTS | HARM TO HEALTH | INDUSTRIAL ACCIDENTS | | | |
| Risks related to safety: | Risks related to the context of execution of activities: | Risks related to industrial processes Examples of activities: | | | |
| examples of risks: falls from height, road accidents, electric shocks, electrocution, explosion, fire, poisoning, injuries relating to the use of tools or machinery, the lifting of equipment. | examples of risks to health: musculoskeletal disorders, psychoso- cial risks, exposure to carcinogenic, mutagenic or reprotoxic products. | operation of LNG terminals, of gas underground storage sites, of gas transmission and distribution networks, of boiler rooms and plants of hydro dams, of heating networks of wind farms; services at a customer's industrial facility; construction of infrastructures. | | | |

Due to the number of fatal accidents in 2021, the Group decided to improve its health and safety at work rules and practices by assessing its health and safety management system and analyzing deviations from best practices implemented by the most efficient industrial players in this field.

To do so, the Group engaged the services of an external consultant to carry out this assessment of its health and safety organization and culture.

The assessment carried out by the external consultant identified the Group's strong points and resulted in the issue of a certain number of recommendations aimed at permanently eradicating serious and fatal accidents.

Based on these recommendations, the analysis carried out internally and feedback from operating entities, the Group defined a major health and safety transformation plan called "ENGIE One Safety," which will be gradually rolled out by 2024.

The main measures of ENGIE One Safety applied in 2022 were the following:

- improving the Group health and safety rules drawing on best practices from an external benchmark; these rules cover the health and safety of subcontractors, the identification and processing of events with high potential of severity (HiPo), the management of risks, compliance with the Life-Saving Rules, and promotion of a fair culture (recognition and sanctions);
- the design and testing of a new method of training-coaching managers so that managerial safety rituals (for example, managerial safety visits, subcontractor visits) have the expected outcome on the safety behavior of the teams on the ground, including that of our subcontractors;
- revising the Group's health and safety indicators so that they focus more on anticipating risks and the

3.9.1.3 Prevent and manage risks related to personal security

The Group's Security and Economic Intelligence Department is notably responsible for ensuring that people are protected. It brings together and leads a network of security managers who define and coordinate the implementation of the ENGIE's Group Security policy.

The "protection of individuals against malicious acts" section of ENGIE's Group Security policy is governed by Law 2017-399 on the duty of vigilance of parent companies and contractors dated March 27, 2017. This duty of protection applies to all employees, regardless of their status, and notably those who are internationally mobile.

Malicious threats and acts targeting individuals form an integral part of the security risks included in the company's risk catalog (ERM/Enterprise Risk Management). Security incidents are recorded in a Group incident reporting tool

3.9.1.4 Prevent and manage environmental and societal risks

From an environmental perspective, the major risk for the Group is climate risk, followed by biodiversity, water and pollution risks. These global and local environmental risks are identified annually at both Group and local level in order to

implementation of efficient preventive actions in the field; new indicators focused on prevention were thus defined (leading indicators)⁽¹⁾, in addition to the traditional indicators which focus on accident reporting (lagging indicators);

- implementation of a group of health and safety experts, managed centrally, aimed at carrying out internal audits for the Group and supporting the entities on specific subjects;
- deployment of a new communication plan aimed at raising awareness among Group employees and subcontractors of the intangible nature of the Life-Saving Rules.

The main actions implemented in terms of process safety (No Asset at Risk prevention axis) are described in Section 2.2.5.2 "Risk of industrial accident."

The other measures intended to ensure the health and safety of individuals working for the Group are presented in Section 2.2.6.2 "Health and safety at work" and in Section 3.4.7 "Health and safety policy." Details of the measures are provided on the Group's website: https://www.engie.com/ engagements/global-care.

(MySecurityIncident), brought to the attention of the security team and are systematically dealt with.

The security network pays particular attention to the respect for human rights in security activities and implements measures aimed at preventing any risk of disproportionate use of force. For this reason, contracts with care-taking and private security firms always include the Group's ethics and sustainable development clause which appears in the general procurement conditions. Moreover, these firms are always subject to checks (due diligence) before they are used.

Security managers are advised by the Security department, which regularly reminds them of their obligations in this area. Finally, security players, working closely with the data privacy teams, ensure that GDPR rules and local laws relating to recordings and the conservation of video protection data are also strictly adhered to.

establish a list of "at risk" sites. From a societal point of view, the risks analyzed are the impact of activities on local communities and their social consequences.

| ENVIRONMENTAL RISKS | SOCIETAL RISKS |
|---|--|
| Climate change and GHG Biodiversity and the rehabilitation of ecosystems Water Pollution Adaptation | Relations with local communities Training, employee retraining Right to operate in a territory Affordable business offers |

The Group's CSR Policy guides the vigilance process with regard to environmental and social matters (see Section 3.1.1). Environmental and societal risks are analyzed periodically at every level of the company. This policy is deployed in each Global Business Unit (GBU), subsidiary, and site. Its implementation is monitored through goals and action plans that are reviewed every year. This review process enables us to make sure our obligations, with respect to environmental and societal vigilance, are properly satisfied.

The environmental policy fully incorporates this risk analysis. The control of its CO_2 emissions is a major issue for the Group: ENGIE committed, in May 2021, to the "Net Zero-Carbon" by 2045 objective for all of its direct and indirect emissions. This objective should be achieved by following a "well below 2°C" trajectory, with intermediate milestones.

To date, the Group has taken visible measures, notably with a view to deploying its plan to exit coal by 2027 at the latest, to reduce the carbon intensity of its electricity production, to reduce emissions relating to the use of products sold, drastically by 2045, to align future investments with its carbon ambition, to allocate carbon budgets to each GBU and to assess management teams based on the achievement of "Net Zero-Carbon" objectives.

ENGIE's climate trajectory is set out in the 2023 Climate Notebook (www.engie.com/en/group/social-responsibility/csrpublications).

The environmental policy also aims to institute action plans at various levels to avoid, reduce, and if necessary, offset the environmental impacts of the Group's activities.

The societal policy is focused on stakeholder engagement. Its implementation includes a toolbox, training programs and a center of expertise.

E-learning modules covering the climate, biodiversity, stakeholder engagement and the CSR matrix in investment decisions have been developed since 2021 with the Sustainability Academy and target, more specifically, operational employees and managers who are directly concerned by this subject.

Results from e-learning participation in 2022:

| e-learning courses proposed | Number of participants since the launch |
|--|--|
| Net zero-carbon ambition (2021) | 5,883 |
| Business change maker (2021) | 1,188 |
| CO ₂ killer (2021) | 1,324 |
| People of the world (2021) | 1,075 |
| Introduction to biodiversity (November 2021) | 2,275 |
| Stakeholder engagement (March 2022) | 302 |
| CSR matrix (April 2022) | 328 |
| Digital Responsibility (June 2022) | 2,722 |
| TOTAL | 15,097 |

In addition, since 2021, the Group has taken nine CSR criteria into account for its major investment projects, assessed using risk and opportunity analyses. These criteria mainly relate to: reducing GHG emissions, adaptation to climate change, biodiversity, water, pollution, the circular economy, ethics,

health and safety, collaboration with stakeholders and sustainable procurement. These criteria are described in detail on the ENGIE website at https://www.engie.com/en/analysts/ governance/duty-of-vigilance-environmental-societal-risks.

3.9.1.5 Prevent and manage risks related to energy supply

The main challenges for ENGIE relating to energy supply (biomass, gas, LNG, etc.) are as follows:

CHALLENGES IN THE ENERGY SUPPLY CHAIN (PRODUCTION, TRANSMISSION, ETC.)

| HUMAN RIGHTS | ENVIRONMENTAL |
|---|--|
| Forced labor, child labor (e.g.: equipment production, mining) Rights of local communities and indigenous populations (e.g. land rights, right to free and informed consent, right to resources, right to health) Health and safety of workers and local communities (e.g. the impact of production operations, protective equipment, chemical products used, risk of explosion, emissions) | Climate change (e.g. CO₂ / methane emissions, carbon footprint, deforestation, use of fossil fuels) Water scarcity and quality (e.g. the use of drinking water, water requirements, the overuse of water, use of chemical products) Air, water and soil pollution (e.g. chemical products, heavy metals, residues, waste management) Biodiversity (e.g. risk to ecosystems, risk to flora and fauna to ecological corridors, deforestation, the use of agricultura land) |
| GIE has identified risks relating to the Group's energy ply as a specific issue of vigilance for the Group. The ties responsible for these purchases manage these risks ctly, in accordance with the Group's reporting rules and graphic and identify the risk energies to each of their | https://www.engie.com/en/analysts/governance/duty-of- vigilance-environmental-societal-risks) to meet challenges, with specific action plans per energy source. If has also improved its governance structure to ensure the duty of vigilance is included in decision making processor |

er d governance, and identify the risks specific to each of their activities by energy source, and at the country and energy supplier level.

With regard to large energy supplies, ENGIE has drawn up a CSR approach (described on ENGIE's website:

e F duty of vigilance is included in decision-making processes and has systematized the supply chain risk assessment approach, based on the 3P approach (People, Planet and Profit).

More generally, entities implement the following prevention and risk management measures:

- entities adopt, where necessary, mitigation measures and contractual clauses adapted to the identified risks (e.g. specific performance clauses for the carbon footprint and methane emissions) in their contracts with suppliers;
- they include the Group's ethics and CSR clause in their contracts, which also allows them to terminate a contract in the event of a breach of these obligations by the third party;
- they apply the human rights policy, ethical due diligence policies, environmental and societal policies, as well as ENGIE's other policies;
- they ensure the certification of certain suppliers and energy sources (e.g. biomass) as well as the presence of guarantees of origin;

- they carry out onsite audits at certain suppliers;
- they take part in bilateral and sector CSR working groups;
- they enter into gas procurement agreements that are compatible with the Group's carbon trajectory;
- in relation to the issue of US shale gas, and the consideration of its environmental impacts, ENGIE carries out extensive due diligence and chooses, among US producers, those who are able to offer the best guarantees in terms of emissions traceability and the environmental monitoring of their activity;
- ENGLE continues its strategy to withdraw from the coal business (in Europe by 2025 and worldwide by 2027).

3.9.1.6 Prevent and manage risks related to non-energy purchases

Six procurement categories are currently considered high risk in terms of human rights, health and safety and / or their environmental impact. These procurement categories are listed below:

| PROCUREMENT CATEGORIES | SEVERE RISKS IDENTIFIED | ACTION PLANS |
|---|--|---|
| • Solar panels • Batteries | Human / environmental rights Environmental / human rights | Contractual provisions reinforced to ensure the traceability of equipment and new suppliers located in lower risk countries (see Section 2.2.5.3) |
| · Wind power | Human / environmental rights | Contractual provisions reinforced to ensure the traceability of equipment (see Section 2.2.5.3) |
| · Electrical equipment | Human Rights | Social audits and sourcing of new suppliers |
| · Workwear | Human Rights | Social audits and diversification (Brazil for example) |
| • IT equipment (PCs, printers, etc.) | Human Rights | Diversification of the panel of suppliers thanks to relocation to the United States and Europe |
| • Turnkey EPC contracts | Health and safety / human rights | Reinforcement of health and safety rules and exclusion of supplier: who do not respect these rules |

Since 2020, particular attention has been paid to purchases that may be linked to forced labor in China. The principal measures taken to identify and manage these risks are presented in Section 2.2.5.3.

The identification of these six categories and risk management are ensured by the implementation of ENGIE's Procurement vigilance process through:

- the implementation of the Group's Procurement management system;
- the management category as defined in the Group's procurement organization.

The Procurement management system is structured around two guidance documents: a Procurement Charter and Procurement Governance which set out:

• ENGIE's commitments and requirements vis-à-vis its suppliers in terms of ethical relations, a selection on ethical, health and safety, and environmental criteria;

 14 rules, including due diligence obligations for key suppliers for the Group and entities, the implementation of the Code of Conduct for supplier relations, and an analysis of ethical risks that must be carried out within each entity, etc.

These principles and rules are set out in the operational procurement processes which include the following key stages:

- the CSR assessment of new preferred (Group level) and major (entity level) suppliers by our partner EcoVadis;
- the analysis of risks and opportunities based on a risk matrix developed in partnership with EcoVadis. This matrix establishes a CSR risk for each of the 62 procurement categories across four dimensions: ethics, human rights, environment and sustainable procurement. The CSR risk is either compounded or improved by the level of country risk;

- the implementation of associated management plans taking into account the eligibility criteria of suppliers. These plans may include, for example, audits, specific contractual provisions to limit the risk, an ethics clause, etc. A risk reduction plan is automatically implemented for suppliers with an EcoVadis score below 45/100;
- the measurement of the performance delivered by the suppliers and related improvement plans.

The proper implementation of these processes is verified via the INCOME internal control program (see Section 2.3). With 28 different controls, the INCOME PRO reference system covers all procurement processes.

Moreover, the Group Procurement Department works in partnership with the Audit Department to ensure the monitoring of corrective action plans recommended by the latter.

Lastly, the Procurement management system is facilitated by a continuous training plan for the entire Procurement sector. Face-to-face and videoconferencing sessions are supplemented by the delivery of online modules via Ulearn, the Group's training Intranet. In 2022, around 300 purchasers took part in the "Ethics and supplier relations" and "Due Diligence" training courses through face-to-face sessions and videoconferencing. Three Ulearn training modules were mandatory for the entire procurement function: Fraud and Corruption, Zero Tolerance; Our Group, Our Ethics; and Competition Law. In December 2022, the Group Procurement Department also took part in the "Climate fresco" training course which raises awareness among employees regarding climate issues and possible actions.

3.9.2 SITUATION RELATED TO RUSSIA AND UKRAINE

ENGIE has no industrial activity in Russia and no investment projects are underway on Russian territory. ENGIE closed its representative office in Moscow in 2022. One employee was

3.9.3 THIRD-PARTY ASSESSMENT

In 2022, 100% of the partners in the Group's investment projects were subject to due diligence, including a systematic study of "vigilance" topics by the ethics line.

Directly or indirectly, 100% of the Ethics & Compliance Officers have access to a specialist due diligence tool. Due diligence is carried out on third parties (suppliers, subcontractors, partners, contractors, etc.) in line with due diligence policies, as described on ENGIE's website: https:// www.engie.com/en/ethics-and-compliance/vigilance-plan/

third-parties. In 2022, the Group's Ethics & Compliance Officers and ethics correspondents declared more than 17,000 level one due diligence searches performed using the due diligence tools.

based in Ukraine and left the country at the beginning of the Russian invasion, in February 2022. Moreover, ENGIE has no activities in Crimea, the Donbass or the Louhansk Oblast.

In addition, the Group's new preferred and major suppliers are automatically assessed by the procurement line via due diligence carried out by the Category Managers and Chief Procurement Officers before contracting takes place. Since 2019 this rule has been gradually extended to cover a panel of 1,563 recurring suppliers, representing 38% of expenditure excluding energy. In 2022, the procurement line launched an ethics assessment by EcoVadis of around 400 preferred and major suppliers. The objective monitored by the procurement line is to assess around an additional 250 to 300 preferred and major suppliers each year.

3.9.4 WHISTLEBLOWING AND COLLECTION OF ALERTS

The whistleblowing system has been open to all employees, permanent or temporary, and to all external stakeholders, since January 2019. An external service provider forwards the anonymous report to ENGIE for processing (see

Section 3.8.4). In 2022, 254 alerts were received via the system, 78 of which concern risk categories related to the duty of vigilance. They can be summarized as follows:

| Allegations of harassment* | Allegations relating to health and safety | Allegations relating to working practices | Allegations of discrimination | Questions related to the environment and the rights of communities |
|-------------------------------|--|--|-------------------------------|---|
| 39 | 10 | 21 | 7 | 1 |

* There were 35 allegations of harassment and two allegations of sexual harassment. Nine allegations of sexual harassment were also identified within the management system.

As for all of our alerts, alerts relating to allegations of discrimination and harassment are processed systematically and immediately. When allegations are proven to be true,

disciplinary measures are systematically taken and action plans deployed.

3.9.5 STEERING, GOVERNANCE AND FOLLOW-UP OF THE DEPLOYMENT OF THE PLAN

3.9.5.1 Steering and follow-up at the highest corporate level

The Group has set up monitoring and global coordination at the highest level to meet the law's objectives in an effective way. The plan was approved by the Executive Committee, which entrusted its management to the Ethics, Compliance & Privacy Department (ECPD), under the responsibility of the Legal, Ethics and Compliance Department, itself attached to the Corporate Secretariat. A report on the effective implementation of the plan is presented annually to the EESDC of the Board of Directors.

A specific committee is responsible for the operational implementation of the plan. Its aim is to ensure that the plan is distributed and that information can be fed back easily. The members are:

| Departments | | | | | | | |
|-------------|---------|---------------------------|------------------------------------|------------------------|------------------|---------------------|------|
| ECPD | CSR | Procurement Department | Health and Safety Department | Security Department | HR Department | Internal control | Risk |
| | | | Regions / opera | ational members | | | |
| SOUTHAM | NORTHAM | FRANCE | EUROPE | AMEA | GEMS | TRACTEBEL | |
| | | | | | | | |

In addition, each entity must ensure that the vigilance plan has been effectively rolled out within its scope. The monitoring of these actions by the entities is included in the annual compliance report (see Section 3.8.6).

3.9.5.2 Stakeholder relations

The plan and the progress made in its implementation are presented and regularly discussed with the employee representative bodies. It has been implemented via the existing committees at the Group level, as well as at the European Works Council. The plan is also presented to the EESDC for the Board of Directors. The entities were also asked to present the vigilance plan to their employee representative organizations. This approach was implemented when the first vigilance plan was adopted.

Since 2020, an internal control process, notably aimed at ensuring that all stakeholders are aware of the requirements set out in the law and the vigilance plan, has been in place.

The new global agreement is a resource to facilitate the deployment of the vigilance approach. It was negotiated and signed in 2022 with all of the Group's social partners at a global level. Under this agreement, ENGIE's duty of vigilance is subject to strengthened social dialog: group discussion sessions were organized with international the trade union federations in 2022. These discussions resulted in the

adoption of the mechanism described on the website. A body to monitor this agreement meets once a year. These exchanges also make it possible to monitor the vigilance approach in consultation with social partners. For further information: https://www.engie.com/en/ethics-and-compliance/vigilanceplan/stakeholders.

In order to prevent and manage the human rights, environmental and societal impact of its activities as best as possible, ENGIE has adopted a specific "commitment to stakeholders" policy, as part of the Group's CSR policy. This policy is available on ENGIE's website: https://www.engie.com/ en/group/social-responsibility/policies.

Finally, the Group is committed to building a meaningful dialog which each of its stakeholders. In 2021, ENGIE set up a Dialog Committee with its stakeholders as well as a recourse space to support sensitive projects. This Committee met on October 21, 2022 to discuss the subject of a fair transition (see Section 3.6.3).

3.9.6 DUTY OF VIGILANCE CORRELATION TABLE

| Risk categories covered by the vigilance plan | Location in the URD | Page |
|---|--|------|
| Risks related to human rights | Section 3.8.1 "Ethics and compliance governance" | 131 |
| Risks related to the health and safety of individuals | Section 3.4.7 "Health and safety policy" | 115 |
| Risks related to the security of individuals | Section 3.9.1.3. "Prevent and manage risks related to personal security" | 137 |
| Environmental and societal risks | Section 3.1.1 "CSR policy and governance" | 66 |
| Risks related to non-energy procurement | Section 3.7 "procurement, outsourcing and suppliers" | 130 |
| The four risks above | Section 2.2 "Risk factors" | 45 |

Details of the categories above are provided on the Group's website: https://www.engie.com/en/group/ethics-and-compliance/policies-and-procedures.

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