



## ENGIE SA 2024 MODERN SLAVERY STATEMENT (for the financial year ending 31<sup>st</sup> December 2024)

### 1. Presentation of the Group

ENGIE S.A. is the ultimate parent company of the ENGIE Group, a global reference in low-carbon energy and services. With its 97,967 employees at 31 December 2024, its customers, partners and stakeholders, ENGIE is committed to accelerating the transition towards a carbon-neutral world, through reduced energy consumption and more environmentally-friendly solutions. Guided by its purpose ("raison d'être"), ENGIE reconciles economic performance with a positive impact on people and the planet, building on its core businesses to offer competitive solutions to its customers. ENGIE operates mainly in France and in four regions (Europe, South America, North America and Asia, Middle East, Africa - AMEA). The Group's operational activities are conducted by ENGIE S.A. and its subsidiaries; compliance with ethics and compliance principles, including those relating to respect for Human rights, is an integral part of these operations carried out under the responsibility of the management of these organisations.

In March 2025, ENGIE published its Sustainability Statement for 2024 in accordance with the *Corporate Sustainability Reporting Directive* (CSRD). This document is available in ENGIE's 2024 Universal Registration Document. It covers the Group's material challenges in terms of ESG (Environment, Social and Governance), the actions taken to manage them and the targets set to measure progress. The document includes a Social Section introduced by a Chapter on Respect for Human Rights and a Chapter on Sustainable Procurement in the Governance Section (please consult [ENGIE's Universal Registration Document 2024](#), p. 68, p.141, p.189)

To find out more about the ENGIE Group and its activities, please visit the website: [www.engie.com](http://www.engie.com), "About us" and "Activities" tabs, accessible from the home page.

### 2. The Group's commitments

The Group's commitment to respecting Human rights, including the explicit rejection of forced labour, is at the heart of its Ethics and Compliance System, which is set out in the following documents, which are all publicly available:

- the Group's [Ethics Code of Conduct](#)
- the dedicated Human Rights Policy, updated in 2024 and now called the "[Duty of Vigilance Policy - Human Rights](#)",
- the Group's [Vigilance Plan](#), drawn up in accordance with French law on the duty of vigilance of parent companies and contractors,
- the [Procurement Charter](#) and the [Code of Conduct in Supplier relations](#), and
- the [ENGIE Global Agreement on Fundamental Rights and Social Responsibility signed in 2022 by ENGIE and the Group's social partners](#).

## 2.1. The Ethics Code of Conduct

The Ethics Code of Conduct specifies ENGIE's ethical commitments on page 8. These commitments include respect for Human rights and, in particular, the prohibition of forced labour and child labour. On page 20, the Ethics Code of Conduct reiterates this principle while confirming that ENGIE expects this principle to be respected equally by all its third parties. The Ethics Code of Conduct is available in 15 languages on the Group's website at the following address: <https://www.engie.com/en/group/ethics-and-compliance>.

## 2.2. The Human rights vigilance approach

The Vigilance Plan that the Group defined in January 2018 is presented in [ENGIE's Universal Registration Document 2024](#) (p. 223). ENGIE also engages into voluntary commitments to promote Ethics and Human rights: the Group adheres to the United Nations Global Compact and the French section of Transparency International. ENGIE is also a member of the association *Entreprises pour les Droits de l'Homme (EDH)*, which aims to enhance awareness of human rights issues and to integrate them into the activities of its member companies.

ENGIE exercises its vigilance in particular through its Duty of Vigilance Policy - Human Rights. Since 2014, based on the United Nations Guiding Principles on Business and Human Rights, developed in liaison with ENGIE's operational organisations and adopted by the Group's Executive Committee, the purpose of the policy is to define the Group's commitments relating to Human rights and the means to implement them, in particular:

- (1) a global commitment by the Group to carry out its activities while **respecting internationally recognised human rights** and the international standards of the ILO, wherever it operates (see commitment 1.1 of the Duty of Vigilance Policy - Human Rights);
- (2) a commitment to **respect workers' rights**, whereby the Group ensures that the fundamental rights of its employees are respected, in accordance with ILO conventions, including the rejection of all forms of slavery, human trafficking and forced and compulsory labour, and the rejection of all forms of child labour (see commitment 1.2.1 of the Duty of Vigilance Policy - Human Rights);
- (3) a commitment by the Group to exercise vigilance over the **practices of its suppliers and subcontractors** (see commitment 1.2.3. of the Duty of Vigilance Policy - Human Rights). Through this commitment, in accordance with its duty of vigilance, the Group seeks to identify the risks associated with the activities of its suppliers and subcontractors. Where risks have been identified, it implements in-depth vigilance measures, including due diligence before entering into the relationship, the inclusion of contractual provisions on respect for Human rights and the assessment of the practices of the supplier or subcontractor during the contractual relationship;
- (4) **risk analyses** by Group entities upstream of projects and on an annual basis for risks related to the entity's activities (for the latter, the assessment is carried out as part of the Group's ERM process). These analyses specifically include questions aimed at ensuring that Group entities do not participate in or benefit from any form of forced labour. Countries considered to be at high risk of Human rights violations are subject to additional assessment. The annual risk assessment exercise carried out in 2024 did not identify forced labour as a salient Human rights risk for the Group;
- (5) **training and awareness-raising modules** focusing on Human rights, including the issue of forced labour through case studies, made available to all Group employees and deployed each year, including in 2024;
- (6) **Grievance mechanisms** set up at entity and Group level for anyone affected by the Group's activities. The Group's whistleblowing system is based on the collection of alerts by means of an e-mail to [ethics@engie.com](mailto:ethics@engie.com) and a dedicated telephone number. These channels are open to all Group employees worldwide and to all the Group's external stakeholders. Alerts can be received in several languages and the service is available 24 hours a day, 7 days a week. No forced labour violations were identified as a result of these alerts in 2024;
- (7) **monitoring the implementation of these measures** through the Group's ethics and compliance process, the internal control process and internal audits. No issues relating to forced labour were identified in 2024 as part of the control processes.

### 2.3. Responsible procurement

The sustainability of purchases and of the Group's entire supply chain is built around several pillars, including the human impact of procurement, and involves ethical and sustainable practices. ENGIE works with a wide range of suppliers of equipment and services, both locally and internationally. ENGIE considers its suppliers and subcontractors as key stakeholders in the Group's value chain.

The Group's Procurement Referential includes the Code of Conduct in Suppliers Relations, which incorporates the requirements of the International Labour Organisation's conventions on fundamental workers' rights, and the Group Procurement Charter, presented below.

The Group's commitments and requirements with regard to its suppliers and subcontractors, particularly in terms of Human rights, Health and Safety and Ethics, are set out in the Group Procurement Charter. In particular, it sets out the following principles:

- the selection and qualification of suppliers based on multiple criteria, including societal and environmental factors (including Human rights and in particular the rejection of all forms of forced labour) ;
- developing the skills of the Procurement function through a continuous and progressive training programme ;
- ensure that any agreement with a supplier is the subject of a written contract that includes the ethical, environmental and social responsibility clause set out below (including the obligation to adhere to the Group's Human rights commitments).

The Group's due diligence policies, which have been in place for several years, include checks on suppliers' and subcontractors' respect for human rights.

These requirements apply to the whole of the Group's supply chain and are integrated into the model ethics, social and environmental responsibility clause requiring compliance with the Group's commitments, in particular Human rights, in contracts with suppliers and subcontractors. This clause includes topics relating to the duty of vigilance. The prohibition of forced labour is specifically mentioned in this clause. On the basis of this clause, the supplier and subcontractor undertake to comply with it and to ensure that their suppliers and subcontractors also comply.

Since several years, the Group implemented a specific in-depth vigilance action plan to identify and manage the risks of forced labour practices in the Group's supply chains located in China for certain product categories (solar and wind power). In 2024, the Group continued its in-depth vigilance actions. The main measures implemented are described in the "Vigilance Plan" section of [ENGIE's 2024 Universal Registration Document](#) p.226 ;

A cross-functional training programme (*Procurement Academy*) provides a range of mandatory training courses in the following areas: Ethics, Human Rights, Sustainable Development (Energy Transition and Climate Change), Hygiene, Health, Safety, Management, Diversity and Inclusion, Working Conditions and IT Security.



## **2.4. ENGIE Global Agreement on Fundamental Rights and Social Responsibility**

The Global Agreement on Fundamental Rights and Social Responsibility signed in 2022 by ENGIE and the Group's social partners enables the deployment of high standards in terms of labour relations and social rights through regular, open and constructive social dialogue. The agreement includes a section on the Group's commitments in terms of fundamental rights, including the rejection of forced labour and child labour. The agreement is available at <https://www.engie.com/en/news/international-social-agreement>. Further information is available in [ENGIE's 2024 Universal Registration Document](#), Sections "Social Information" p.141 and "Vigilance Plan" p.223).

## **3. Scope of the Statement**

This Statement aims at addressing the requirement of the UK Modern Slavery Act 2015 for the ENGIE Group operating in the UK, it being understood that where ENGIE Group entities have submitted their own Statement to this effect, this Statement is in addition to them.

Through all these measures, the Group ensures that its expectations towards its employees and its suppliers, subcontractors and partners concerning the prohibition of any use of forced labour, including human trafficking and slavery, are met.

The proper application of these principles is monitored by the ENGIE S.A. Board of Directors through its Ethics, Environment and Sustainable Development Committee (EESDC), in particular as part of the Group's annual compliance procedure.

This Statement has been approved by the Board of Directors of ENGIE SA. on 14th May 2025.

Original copy signed on 14th May 2025, by Catherine MacGregor, Member of the Board of Directors and Chief Executive Officer of ENGIE S.A.