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Presentation of ethics compliance referential

Compliance is one of the 5 principles on which ENGIE has based its ethics and compliance policy.

Ensuring ethics compliance allows to determine Group efficiency level in terms of ethics, by measuring results and performances improvement.

The ethics compliance referential serves as a framework for implementing the principle that laws and regulations apply to each of us (ENGIE Ethics code of conduct, p.8).

It outlines how the Group is organized to help implement the Group ethics and compliance program and to measure compliance. It gathers the Group's policies, procedures and activities to ensure the effective implementation of the Group's ethics and compliance policies and procedures.

1. Main parties involved in ethics compliance

ENGIE's ethical commitment is managed at the highest level of the Group, under the impetus of the Group's Board of Directors and general management, and relies on the commitment of the Group's entire management chain.

The Compliance Committee is in charge of supporting ENGIE's ethics and compliance actions. It evaluates the handling of ethical incidents and monitors the process for updating the Group's Ethics & Compliance system.

The Group Ethics, Compliance & Privacy department manages the integration of ethics into the Group's strategy, management and practices. It proposes the policies and procedures in terms of ethics and compliance and in terms of data privacy and drives their application by GBUs, Regional Hubs, entities and Corporate departments. It runs a network of more than 240 people actively involved in the operational implementation of the Group's ethical commitments. The Group Ethics, Compliance & Privacy Department also coordinates the network of Group Data Privacy Managers (DPM), which has around 130 people.

It is composed of members of the Ethics & Compliance line, as well as ethics correspondents.

Mobilizing all of these parties contributes to the Group's exemplary practices in ethics and compliance.

2. Ethics risks analysis

The Group ensures to know precisely and in detail the ethics risks it may face, whether in its daily activities or as part of its development projects. These analyses allow the mapping of ethics risks, which is updated annually and presented to the Ethics, Environment and Sustainable Development Committee (EESDC) of ENGIE Board of Directors, as well as the establishment of specific action plans.

3. ENGIE reference texts

To date, the ethics compliance referential gathers in particular the following policies and procedures, presented on ENGIE website:

- The Group whistleblowing system
- The My Ethics Incident process tool (managerial reporting of ethics incidents)
- Internal Inquiry Guide
- The Group Ethics & Compliance training plan
- The practical guide on mapping of populations most at risk of corruption
- The My Ethics Report procedure and tool (annual ethics compliance reporting)
- The embargo policy
- The policy on incorporation of ethics into HR processes
- The guidelines for managing early warning signs
- The policy on personal data protection

Also contributing to ensuring the effective implementation of the Group's ethics and compliance policies and procedures: the Group's internal control program, internal audits and external certifications.