



COMMUNICATION ON
PROGRESS

This is our **Communication on Progress** in implementing the principles of the **United Nations Global Compact** and supporting broader UN goals.

We welcome feedback on its contents.

I am pleased to confirm that EDF Luminus continues to support the ten principles of the Global Compact on human rights, labor, environment and anti-corruption. As already stated on November, 2013, in our initial letter of commitment, the Global Compact and its principles are part of the strategy, CSR policy and day-to-day operations of our company.

Being the first challenger on the Belgian electricity and gas markets, sustainability is the basis of our development. We offer a large range of environment-friendly energy products (guaranteed "green" electricity contracts, CO₂-compensated gas...) & energy efficiency services, for residential customers and companies (smart thermostats, boiler maintenance, demand side management, etc.). We also invest in growing our wind turbines and the renovation of our hydro power plants. We continuously upgrade our thermal power plants to reduce their impact on the environment. As highlighted in this first COP and our Sustainable Development report for 2013, we are engaged in collaborative projects that advance the broader development goals of the United Nations, particularly the Millennium Development Goals relating to environment protection.

EDF Luminus has made a clear statement of this commitment to stakeholders and the general public on its web site and in its 2013 Sustainable Development report (page 19).

We recognize that a key requirement for participation in the Global Compact is the annual submission of a Communication on Progress (COP) that describes our company's efforts to implement the ten principles. We support public accountability and transparency. We therefore commit to report on progress annually, in line with the Global Compact COP policy.

This first COP includes:

- The current statement expressing continued support for the Global Compact and renewing our ongoing commitment to the initiative and its principles.
- A description of practical actions that the company has taken to implement the Global Compact principles in each of the four issue areas (human rights, labor, environment, anti-corruption). See below.
- A measurement of outcomes. See below criteria 8, 12, 16 and 20. Also, our Sustainable Development report includes more than 30 indicators relating to Sustainability.

See CEO signature on specific pdf on line

Grégoire Dallemagne
CEO

On behalf of LMAS sprl

FIRST COMMUNICATION ON PROGRESS AND SELF-ASSESSMENT REGARDING THE 10 PRINCIPLES OF THE GLOBAL COMPACT November 2014

GC Advanced COP Self-Assessment

Updated 1 March 2013

In consultation with signatories and Local Networks, the Global Compact has undertaken an update to the GC Advanced level of the COP Differentiation Programme. On the following pages, you will find the latest version of the GC Advanced COP self-assessment.

Please note that changes include:

- Modification of wording of some existing criteria to further align them with the *Blueprint for Corporate Sustainability Leadership*
- Cross-reference of the criteria on “Robust Human Rights Management Policies and Procedures” to specific elements of the *Human Rights COP Reporting Guidance*
- Exclusion of *Blueprint* Dimension 3, “Engaging with the UN Global Compact” from the self-assessment. This information will be collected in the Global Compact participant profile.
- Placement of former Criterion 24 on external verification of the COP as part of the introductory questions at the beginning of the self-assessment
- Inclusion of a question on *Business and Peace* in the introductory questions, along with 3 follow-up questions for companies that have operations in high-risk and/or conflict-affected areas
- New options for companies to: explain the reason(s) for omission of a given criterion from their COP; indicate plans to fulfill a given criterion that have not yet been implemented; highlight other emerging or established best practices not found in the COP self-assessment

Our Communication on Progress is in the following format:

EDF Luminus COP is a stand-alone document, posted on the United Nations and EDF Luminus sites. The structure of this document follows the latest self-assessment format (in grey) used by companies pursuing the Global Compact “advanced level”. Although EDF Luminus is reaching for “active level” only, a year after its commitment to the Global Compact, using this format will help readers understand where EDF Luminus stands and what is missing to reach the “advanced level”. Text in green highlights answers where EDF Luminus is already in compliance with the Advanced Level criteria. Text in orange highlights areas where progress has to be made to reach advanced level.

This COP refers very often to the 2013 EDF Luminus Sustainable Development report or to other documents/texts already posted on EDF Luminus corporate website.

The 2013 report can be found here:

http://edfluminus.edf.com/fichiers/fckeditor/Commun/EDFLuminus/pdf/DevdurableFINAL_UK.pdf

What is the time period covered by your COP?

Time period covers January 1, 2013 till December 31, 2013.

Does your COP contain a statement by the CEO (or equivalent) expressing continued support for the Global Compact and renewing your company's ongoing commitment to the initiative and its principles?

Please find on page 1 of this COP our CEO's statement expressing continued support for the Global Compact.

Does your COP contain a description of actions and policies related to the following issue areas?

Human Rights	Labour	Environment	Anti-Corruption
Yes	Yes	Yes	Yes

Does your COP contain, if relevant, a description of policies and practices related to your company's operations in high-risk and/or conflict-affected areas?

No, since EDF Luminus is active in Belgium only, i.e. not in high-risk and/or conflict-affected areas.

Does your COP include qualitative and/or quantitative measurement of outcomes illustrating the degree to which targets/performance indicators were met? Y/N

Yes, for instance, ambitious targets regarding the development of renewables were met in 2013 and highlighted on page 39 of the EDF Luminus Sustainable development report. Our report includes more than 30 indicators, with a three year's history, to explain the evolution of the ethical, economic, environmental, and social development of our business.

How does your organization share its COP with stakeholders?

This first COP is easily accessible to all interested parties (e.g., via EDF Luminus website, Ethics page). The first EDF Luminus COP will also be mentioned in the Sustainability report for 2014. The 2013 Sustainability report of EDF Luminus mentioned our participation to the Global Compact as of November 2013 (see page 19 of the SD report). This report is widely distributed to all key stakeholders (eg. employees, opinion leaders, media, consumers, local community).

How is the accuracy and completeness of information in your COP assessed by a credible third-party?

- ☐ Note that assessment of the accuracy and completeness of information in your COP by a credible third-party became a requirement of COPs at the GC Advanced level as of 1 January, 2014. The Global Compact recognizes that there are various options in terms of external assessment. High-quality external assessment should ideally encompass qualitative and quantitative information and performance data in the COP, as well as an explanation of the management systems and processes that foster their credibility. A credible third party is defined as groups or individuals external to the reporting organization who are demonstrably competent in both the subject matter and assurance practices. For optional guidance on the assurance process, companies may refer to p. 41 of the GRI Guidelines (version G3.1).

At the moment, our COP as such is not assessed by a credible third-party.

- ☐ Information is reviewed by multiple stakeholders (e.g., representatives of groups prioritized in stakeholder analysis)
- ☐ Information is reviewed by a panel of peers (e.g., members of the same industry, competitors, benchmarked leaders, others organized via Global Compact Local Network)
- ☐ Information is assured by independent assurers (e.g., accounting or consulting firm) using their own proprietary methodology
- ☐ Information is assured by independent assurers (e.g., accounting or consulting firm) against recognized assurance standard (e.g., ISAE3000, AA1000AS, other national or industry-specific standard)

☒ Other established or emerging best practices

However, most of the information contained in the COP is already published in the EDF Luminus Sustainable development report. Parts of this report are extracts of the Annual Report submitted to the National Bank of Belgium, which is certified by KPMG Company Auditors and Boes & Co Company Auditors. In addition, within the framework of article 225 of the Grenelle II law of 12 July 2010 establishing new publication and verification obligations for French listed companies, the EDF statutory auditors verify the consolidated CSR information presented in the EDF management report. This includes information originating from EDF Luminus. Accordingly, in 2013, the Deloitte firm conducted two audits: one at the Ringvaart power plant, and the other at the EDF Luminus head office in Brussels. No remarks were issued following those audits.

Also, EDF Luminus is a certified Top Employer since 2013, an HR-oriented label which includes working conditions among its criterias and involves random audits on site.

The COP describes any action(s) that the company **plans to undertake by its next COP** to have the credibility of the information in its COP externally assessed, including goals, timelines, metrics, and responsible staff.

EDF Luminus is looking for affordable solutions to have the credibility of the information in this COP externally assessed. It's too early to describe actions undertaken.

The COP incorporates the following high standards of transparency and disclosure:

- ☐ Applies the Global Reporting Initiative (GRI) Sustainability Reporting Guidelines

This first COP does not fully comply with the Global Reporting Initiatives (GRI3 and GRI4) guidelines. However, EDF Luminus Sustainable development report for 2013 contains general and sector Standard Disclosures from the GRI4 Sustainability Reporting Guidelines.

Close to 20 key indicators relating to general or sector disclosures mentioned in the GRI4 Sustainability reporting guidelines are included in the Sustainability report.

See page 55 of the Sustainable Development report:

- 9 of them are core G4 disclosures.
- 6 are disclosures included in both utility and gas & oil sector disclosures.
- 2 are specific electric utility sector disclosures.
- 2 are specific oil and gas sector disclosures.

- ☐ Qualifies for Level B or higher of the GRI G3 or G3.1 application levels

- ☐ Is 'in accordance - core' with GRI G4

- ☐ Is 'in accordance - comprehensive' with GRI G4

- ☒ Provides information on the company's profile and context of operation

i Such as: Legal, group and ownership structure. Countries and scale of operation. Markets served (geographic/sector breakdown, types of customers/beneficiaries). Primary brands/products/services. Supply chain. Commitments to external initiatives.

Information on the company profile is available on pages 2, 4-5 (key figures) of our Sustainability report for 2013, which is available on line.

Markets served and types of offers are described on pages 28-32 of the Sustainable Development report.

The value chain is described on page 17.

Commitment to the Global Compact is included on page 19.

Implementing the Ten Principles into Strategies & Operations

⊕ The term 'value chain', for purposes of this self-assessment, refers to an organization's business partners both upstream (including suppliers and subcontractors) and downstream (e.g. for transport of finished products).

Criterion 1: The COP describes mainstreaming into corporate functions and business units

Indicate which of the following best practices are described in your COP:

- ☒ Place responsibility for execution of sustainability strategy in relevant corporate functions (procurement, government affairs, human resources, legal, etc) ensuring no function conflicts with company's sustainability commitments and objectives

At EDF Luminus, the CSR policy is endorsed by the CEO himself. The CSR department reports to the Deputy General Manager, in charge of Strategy & Innovation. The sustainability strategy is therefore reviewed regularly by the executive committee, as mentioned on page 19 of the 2013 Sustainable Development report. Departments represented in the CSR Committee include Purchasing, Production, Marketing, Corporate Affairs, Human Resources, Internal Audit, etc. Also, Sustainable Development is at the very heart of the company's strategy. Cf pages 10-11 of our Sustainable Development report.

- ☐ Align strategies, goals and incentive structures of all business units and subsidiaries with corporate sustainability strategy
- ☐ Assign responsibility for corporate sustainability implementation to an individual or group within each business unit and subsidiary
- ☐ Design corporate sustainability strategy to leverage synergies between and among issue areas and to deal adequately with trade-offs
- ☐ Ensure that different corporate functions coordinate closely to maximize performance and avoid unintended negative impacts
- ☐ Other established or emerging best practices
 - i** Specify in under 255 characters, including spaces. Alternatively, indicate if your COP does not address this criterion but explains the reason for omission (e.g., criterion deemed immaterial, legal prohibitions, privacy, competitive advantage).

- ☐ Any relevant policies, procedures, and activities that the company **plans to undertake by its next COP** to fulfill this criterion, including goals, timelines, metrics, and responsible staff
 - i** This option is for companies that have not yet begun to implement this criterion, but transparently and thoroughly disclose future plans to progress in this area in their COP.

Criterion 2: The COP describes value chain implementation

Indicate which of the following best practices are described in your COP:

- ☒ Analyze each segment of the value chain carefully, both upstream and downstream, when mapping risks, opportunities and impacts

We have identified each segment of the value chain, both upstream and downstream, and published it in our 2013 Sustainable Development report p. 17. Impacts are also described on that page. The Audit and Risks Committee at Board level reviews each year the internal audit program, to make sure risks are evaluated, controlled or mitigated in a systematic and sustainable manner.

☒ **Communicate policies and expectations to suppliers and other relevant business partners**

Our General Purchasing Conditions are sent to suppliers and contractors at the start of each tender and for each contract. Our purchasing conditions include expectations regarding Safety and CSR among extra-financial criteria.

- ☐ Implement monitoring and assurance mechanisms (e.g. audits/screenings) for compliance within the company's sphere of influence
- ☐ Undertake awareness-raising, training and other types of capacity building with suppliers and other business partners
- ☐ Other established or emerging best practices

i Specify in under 255 characters, including spaces. Alternatively, indicate if your COP does not address this criterion but explains the reason for omission (e.g., criterion deemed immaterial, legal prohibitions, privacy, competitive advantage).

- ☐ Any relevant policies, procedures, and activities that the company **plans to undertake by its next COP** to fulfill this criterion, including goals, timelines, metrics, and responsible staff

i This option is for companies that have not yet begun to implement this criterion, but transparently and thoroughly disclose future plans to progress in this area in their COP.

Robust Human Rights Management Policies & Procedures

⊕Criteria and best practices under human rights implementation have been modified to reflect the Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework (the Guiding Principles), as well as the Human Rights COP Reporting Guidance. Best practices reflect specific reporting elements of the latter guidance, either Basic (numbers starting with BRE) or Advanced (numbers starting with ARE).

Criterion 3: The COP describes robust *commitments, strategies or policies* in the area of human rights

Indicate which of the following best practices are described in your COP:

- ☒ Commitment to comply with all applicable laws and respect internationally recognized human rights, wherever the company operates (e.g., the Universal Declaration of Human Rights, Guiding Principles on Human Rights) (BRE1 + ARE1)
- ☐ The Guiding Principles suggest that this should include a commitment to treat the risk of causing or contributing to gross human rights abuses as a legal compliance issue wherever the company operates

Respect of the law and of international standards is mentioned explicitly in EDF Luminus CSR policy, published in 2012 and 2013 Sustainable Development Reports (pages 13 and 19).

It is also mentioned in the EDF Group CSR agreement, which was endorsed by EDF Luminus in 2011. This agreement includes explicit reference to the Universal Declaration of Human Rights, ILO key conventions regarding forced labor, child labor, discrimination, collective bargaining (29, 87, 98, 100, 105, 111, 135, 138, 182).

- ☒ Integrated or stand-alone statement of policy expressing commitment to respect and support human rights approved at the most senior level of the company (BRE 1 + BRE5 + ARE 1 + ARE 5)

The EDF Luminus Code of Conduct includes a statement from the CEO which expresses support for human rights. It also refers to the UN Global Compact and the Universal Declaration of Human Rights. See <http://edfluminus.edf.com/developpement-durable/ethique-292351.html>

- ☒ Statement of policy stipulating human rights expectations of personnel, business partners and other parties directly linked to operations, products or services (BRE 1)
- ☒ Statement of policy publicly available and communicated internally and externally to all personnel, business partners and other relevant parties (BRE 1 + BRE 5 + ARE 1 + ARE 5)

The Code of Conduct of EDF Luminus is available both on the intranet, to all employees, and on the internet. See <http://edfluminus.edf.com/developpement-durable/ethique-292351.html>.

EDF Luminus General Purchasing conditions include a CSR clause which is quite detailed:

24.2. Social clause - According to its commitments on ethics, EDF Luminus has particularly obliged itself to respect the fundamental principles and rights stated in the United Nations Declaration of Human Rights, the European Union Charter of Fundamental Rights and the Conventions made under the International Labour Organization. In this context, EDF Luminus applies these principles –and, particularly, those relating to child labour and forced or obligatory labour– to its purchases.

The Contractor declares that he shall adhere to the fundamental principles and rights stated above. He shall respect and implement the industrial and human resources required to ensure their application, by his own personnel, his sub-contractors and his suppliers. He shall also undertake to provide proof of their layout to EDF Luminus at the latter's first request. EDF Luminus reserves the right to verify, through a competent and authorized organization, that the working conditions that are applied by the Contractor, his sub-contractors and his suppliers do not violate these principles.).

Those conditions are systematically communicated to potential or actual suppliers.

- ☐ Other established or emerging best practices

- ☐ Specify in under 255 characters, including spaces. Alternatively, indicate if your COP does not address this criterion but explains the reason for omission (e.g., criterion deemed immaterial, legal prohibitions, privacy, competitive advantage).

- ☐ Any relevant policies, procedures, and activities that the company **plans to undertake by its next COP** to fulfill this criterion, including goals, timelines, metrics, and responsible staff
- i** *This option is for companies that have not yet begun to implement this criterion, but transparently and thoroughly disclose future plans to progress in this area in their COP.*

Criterion 4: The COP describes effective *management systems* to integrate the human rights principles

Indicate which of the following best practices are described in your COP:

- ☐ Process to ensure that internationally recognized human rights are respected
- ☒ **On-going due diligence process that includes an assessment of actual and potential human rights impacts (BRE 2 + BRE 3 + ARE 2 + ARE 3)**

A yearly risk assessment is done at EDF Luminus to help mitigate and control risks. A risk register is updated twice a year.

i *The Guiding Principles suggest that the assessment:*

- *Include the risk of impacts the business enterprise may be involved in through its own activities, business relationships, and country and/or industry context*
- *Involve meaningful consultation with potentially affected groups and other relevant stakeholders to assess actual and potential impacts as well as risks*
- *Be ongoing and evolving, adapted to size and complexity*
- *Be included in risk management systems*

The Guiding Principles also suggest that risks should not be limited to the risks to the company itself (material) but should also include risks to right-holders. Lastly the Guiding Principles suggest that findings from impact assessments should be integrated across relevant internal functions and processes.

- ☐ Internal awareness-raising and training on human rights for management and employees
- ☒ **Operational-level grievance mechanisms for those potentially impacted by the company's activities (BRE 4 + ARE 4)**

The Group Ethical alert system is accessible to all. CF <http://alerte-ethique.edf.com>.

- ☒ **Allocation of responsibilities and accountability for addressing human rights impacts**

Each manager is in charge of making sure human rights are respected and breaches addressed. The EDF Luminus Code of Conduct highlights the role of managers as the first alert level in case of irregularities. See: http://edfluminus.edf.com/fichiers/fckeditor/Commun/EDFLuminus/pdf/CodeDeConduite_FR_20_01.pdf. If necessary, the manager can ask for advice among HR, Legal and CSR colleagues. The Belgian law also makes it mandatory for companies to appoint “confidential counsellors” in order to prevent psychosocial incidents, especially discrimination or harassment. The appointment of those counsellors has to be approved by social partners and the number of cases reported to counsellors is part of the yearly Health & Safety report sent to Belgian authorities.

- ☐ Internal decision-making, budget and oversight for effective responses to human rights impacts
- ☐ Processes to provide for or cooperate in the remediation of adverse human rights impacts that the company has caused or contributed to (BRE 3+ BRE 4 + ARE3 + ARE 4) LEGAL
- ☐ Process and programs in place to support human rights through: core business; strategic philanthropic/social investment; public policy engagement/advocacy; partnerships and/or other forms of collective action (BRE 6 + ARE 6)
- ☐ Other established or emerging best practices

i *Specify in under 255 characters, including spaces. Alternatively, indicate if your COP does not address this criterion but explains the reason for omission (e.g., criterion deemed immaterial, legal prohibitions, privacy, competitive advantage).*

- ☐ Any relevant policies, procedures, and activities that the company **plans to undertake by its next COP** to fulfill this criterion, including goals, timelines, metrics, and responsible staff

i *This option is for companies that have not yet begun to implement this criterion, but transparently and thoroughly disclose future plans to progress in this area in their COP.*

Criterion 5: The COP describes effective *monitoring and evaluation mechanisms* of human rights integration

Indicate which of the following best practices are described in your COP:

- ☒ System to monitor the effectiveness of human rights policies and implementation with quantitative and qualitative metrics, including in the supply chain (BRE3 + ARE3)

i The Guiding Principles also suggest that such monitoring should be based on qualitative and quantitative indicators.

A mapping of all EDF Luminus suppliers in 2012 (2800) has been done in 2013 to identify critical suppliers from a CSR point of view. See Page 19 of the 2013 Sustainable Development report.

Some audits done at Group level have been shared with EDF Luminus in 2013 (60 audits done in 2013, 57 in 2012 and 57 in 2011). See <http://rapport-dd-2013.edf.com.edf-partage-web-02-natpub.edf.lbn.fr/audits-fournisseurs-resultats-2013>

- ☐ Monitoring drawn from internal and external feedback, including affected stakeholders
- ☐ Leadership review of monitoring and improvement results
- ☐ Process to deal with incidents the company has caused or contributed to for internal and external stakeholders (BRE 4 + ARE 4)
- ☒ Grievance mechanisms that are legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning, and based on engagement and dialogue (BRE4 + ARE4)

Alert system at EDF Luminus includes confidentiality counsellors. The Group alert system also allows direct alert to the Group Ethical Committee. See pages 52 of the EDF Luminus Sustainable Development report for 2013 and page 50 of the 2012 report.

- ☒ Outcomes of integration of the human rights principles

i - **Outcomes of due diligence process**

Suggested GRI Indicators: HR2 Percentage of significant suppliers, contractors, and other business partners that have undergone human rights screening, and actions taken. HR10 Percentage and total number of operations that have been subject to human rights reviews and/or impact assessments.)

- **External and formal reporting of operations or operating contexts that pose risks of severe human rights impacts.** The Guiding Principles suggest that communications should:

(a) Be of a form and frequency that reflect an enterprise's human rights impacts and that are accessible to its intended audiences;

(b) Provide information that is sufficient to evaluate the adequacy of an enterprise's response to the particular human rights impact involved;

(c) In turn not pose risks to affected stakeholders, personnel or to legitimate requirements of commercial confidentiality.

- **Disclosure of main incidents involving the company.** The Global Compact Office acknowledges that providing such details may be counterproductive for various reasons related to the protection of human rights, and that confidentiality may, at times, be more effective in alleviating human rights abuses.

- **Outcomes of remediation processes of adverse human rights impacts** (Suggested GRI Indicator: HR11 Number of grievances related to human rights filed, addressed and resolved through formal grievance mechanisms.)

The EDF Luminus Sustainable Development report for 2012 mentions that no formal grievances relating to human rights have been recorded. It was the same in 2013.

- ☐ Other established or emerging best practices

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- ☐ Any relevant policies, procedures, and activities that the company **plans to undertake by its next COP** to fulfill this criterion, including goals, timelines, metrics, and responsible staff

i This option is for companies that have not yet begun to implement this criterion, but transparently and thoroughly disclose future plans to progress in this area in their COP.

Robust Labor Management Policies & Procedures

Criterion 6: The COP describes robust *commitments, strategies or policies* in the area of labor

Indicate which of the following best practices are described in your COP:

- ☒ Reference to principles of relevant international labor standards (ILO Conventions) and other normative international instruments in company policies


The EDF Luminus Code of Conduct (see p. 27) refers explicitly to ILO conventions and other normative international instruments.

The EDF Group CSR agreement, which applies to EDF Luminus since 2011, includes a reference to several ILO conventions. See article 1 (page 5) at:

http://about-us.edf.com/fichiers/fckeditor/Commun/RH/Publications/Annee/2009/EDF_Accord_RSE09_va.pdf.

Also, all 10 principles of the Global Compact are mentioned in our Sustainable Development report for 2013 (page 19).

In Belgium, freedom to associate and negotiate is guaranteed by law.

-  While the 10 Global Compact principles are based on international conventions, organizations are encouraged to reference these documents explicitly to show detailed understanding of the Global Compact principles' underlying meaning.

- ☒ Reflection on the relevance of the labor principles for the company

-  The company should reflect on (1) significant labor-related social and economic impacts of the enterprise and (2) whether such impact could substantively influence the assessments and decisions of the organization's stakeholders.

In Belgium, freedom to associate and negotiate is guaranteed by law. Collective bargaining is mandatory for some topics. Among them are company rules, restructuring, etc.

The EDF Group CSR Agreement (see clause 6 page 8 and 9) which applies to EDF Luminus deals with "anticipation and guidance in industrial restructuring processes". According to this clause, the aim of this clause is to apply the following principle: "Principle of dialogue between management and the trade unions and employee representatives, via information and dialogue on the economic stakes, the consequences of decisions and the proper adaptation of individual and collective guidance, as well as the monitoring of their application."

- ☒ Written company policy to obey national labor law, respect principles of the relevant international labor standards in company operations worldwide, and engage in dialogue with representative organization of the workers (international, sectorial, national).

See EDF Group CSR agreement mentioned above.


- ☒ Inclusion of reference to the principles contained in the relevant international labor standards in contracts with suppliers and other relevant business partners

EDF Luminus General Purchasing conditions include a CSR clause which is quite detailed:

24.2. Social clause - According to its commitments on ethics, EDF Luminus has particularly obliged itself to respect the fundamental principles and rights stated in the United Nations Declaration of Human Rights, the European Union Charter of Fundamental Rights and the Conventions made under the International Labour Organization. In this context, EDF Luminus applies these principles –and, particularly, those relating to child labour and forced or obligatory labour– to its purchases.

The Contractor declares that he shall adhere to the fundamental principles and rights stated above. He shall respect and implement the industrial and human resources required to ensure their application, by his own personnel, his sub-contractors and his suppliers. He shall also undertake to provide proof of their layout to EDF Luminus at the latter's first request. EDF Luminus reserves the right to verify, through a competent and authorized organization, that the working conditions that are applied by the Contractor, his sub-contractors and his suppliers do not violate these principles.).

- ☐ Specific commitments and Human Resources policies, in line with national development priorities or decent work priorities in the country of operation

 Examples: Inclusion of vulnerable/discriminated groups in the workforce (e.g., women, disabled, migrant, HIV/AIDS, older/younger workers); equal pay for work of equal value; contribution to national strategies to eliminate child/forced labor, etc.

- ☐ Participation and leadership in wider efforts by employers' organizations (international and national levels) to jointly address challenges related to labor standards in the countries of operation, possibly in a tripartite approach (business – trade union – government).

☒ **Structural engagement with a global union, possibly via a Global Framework Agreement**
 The EDF Group CSR agreement has been signed by 3 global unions in 2009. See page 19 of the agreement. They are the following:

- ICEM (International Confederation of Energy, Mining and General Workers Unions)
- PSI (Public services International)
- IFME (International Federation of Mining and Energy).

- ☐ Other established or emerging best practices

i Specify in under 255 characters, including spaces. Alternatively, indicate if your COP does not address this criterion but explains the reason for omission (e.g., criterion deemed immaterial, legal prohibitions, privacy, competitive advantage).

- ☐ Any relevant policies, procedures, and activities that the company **plans to undertake by its next COP** to fulfill this criterion, including goals, timelines, metrics, and responsible staff

i This option is for companies that have not yet begun to implement this criterion, but transparently and thoroughly disclose future plans to progress in this area in their COP.

Criterion 7: The COP describes effective *management systems* to integrate the labor principles

Indicate which of the following best practices are described in your COP:

- ☐ Risk and impact assessments in the area of labor
- ☒ Dialogue mechanism with trade unions to regularly discuss and review company progress in addressing labour standards

There is a dialogue mechanism with trade unions, which takes into account both Belgium regulation and company standards. For instance, unions are systematically involved in the discussions about job descriptions and classification. All of the EDF Luminus workforce is represented by elected employees who participate in collective bargaining.

- ☒ Allocation of responsibilities and accountability within the organization

As shown on pages 9 and 11 of our Sustainable Development report, the executive committee of EDF Luminus includes a Human Resources division. The job description, area of responsibility, objectives & results of the Corporate Director in charge of Human Resources are approved by the Board.

- ☐ Internal awareness-raising and training on the labour principles for management and employees
- ☐ Active engagement with suppliers to address labour-related challenges

- ☒ Grievance mechanisms, communication channels and other procedures (e.g., whistleblower mechanisms) available for workers to report concerns, make suggestions or seek advice, designed and operated in agreement with the representative organization of workers

EDF Luminus complies with the Belgian law which makes it mandatory to appoint confidential counsellors, in charge of preventing and managing psychosocial incidents. Their appointment must be approved by the social partners.

The company rules and Code of Conduct of EDF Luminus mention other whistleblower mechanisms relating to Health and Safety, harassment, discrimination, etc. which includes external medical advice.

- ☐ Other established or emerging best practices

i Specify in under 255 characters, including spaces. Alternatively, indicate if your COP does not address this criterion but explains the reason for omission (e.g., criterion deemed immaterial, legal prohibitions, privacy, competitive advantage).

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- ☐ Any relevant policies, procedures, and activities that the company **plans to undertake by its next COP** to fulfill this criterion, including goals, timelines, metrics, and responsible staff
 - i** *This option is for companies that have not yet begun to implement this criterion, but transparently and thoroughly disclose future plans to progress in this area in their COP.*

Criterion 8: The COP describes effective monitoring and evaluation mechanisms of labour principles integration

Indicate which of the following best practices are described in your COP:

- ☒ System to track and measure performance based on standardized performance metrics

The number of cases reported to counsellors is part of the yearly Health & Safety report sent to Belgian authorities. See page 52 of our 2013 Sustainable Development report.

- ☒ Dialogues with the representative organization of workers to regularly review progress made and jointly identify priorities for the future

Dialogue with unions takes place in several instances at EDF Luminus. Among them are monthly works councils and Health and Safety committees.

As mentioned in EDF Luminus Sustainable Development report on page 48, a monitoring committee involving both management and union representatives held several meetings to discuss the implementation of the reorganization that took place in 2013.

The creation of this committee was part of the agreement reached with unions when negotiating the new organization.

- ☒ Audits or other steps to monitor and improve the working conditions of companies in the supply chain, in line with principles of international labor standards

A mapping of all EDF Luminus suppliers in 2012 (2800) has been done in 2013 to identify critical suppliers from a CSR point of view. See Page 19 of the 2013 Sustainable Development report. Audits of critical suppliers will occur regularly, in 2014 and beyond.

- ☐ Process to positively engage with the suppliers to address the challenges (i.e., partnership approach instead of corrective approach) through schemes to improve workplace practices
- ☐ Outcomes of integration of the Labour principles
 - i** *To report main incidents involving the company, disclosure that your organization had no labour-related abuses in the past year satisfies this best practice where providing details may be counterproductive. Suggested GRI Indicators: LA4, HR4-7.*
- ☐ Other established or emerging best practices
 - i** *Specify in under 255 characters, including spaces. Alternatively, indicate if your COP does not address this criterion but explains the reason for omission (e.g., criterion deemed immaterial, legal prohibitions, privacy, competitive advantage).*

-
- ☐ Any relevant policies, procedures, and activities that the company **plans to undertake by its next COP** to fulfill this criterion, including goals, timelines, metrics, and responsible staff
 - i** *This option is for companies that have not yet begun to implement this criterion, but transparently and thoroughly disclose future plans to progress in this area in their COP.*

Robust Environmental Management Policies & Procedures

Criterion 9: The COP describes robust *commitments, strategies or policies* in the area of environmental stewardship

Indicate which of the following best practices are described in your COP:

- ☐ Reference to relevant international conventions and other international instruments (e.g. Rio Declaration on Environment and Development)
i While the 10 Global Compact principles are based on international conventions, organisations are encouraged to reference these documents explicitly to show detailed understanding of the Global Compact principles' underlying meaning.
- ☐ Reflection on the relevance of environmental stewardship for the company
i In making that determination, the company should consider (1) if it has potentially significant environmental impacts and (2) whether such impact could substantively influence the assessments and decisions of the organisation's stakeholders.
- ☒ **Written company policy on environmental stewardship**

EDF Luminus has implemented a Health, Safety & Environment policy (last update in 2011), an HSE management system and is ISO 14001 certified globally, ie for all its activities. The Health, Safety and Environment policy and the IS 14001 certification are advertised on EDF Luminus internet site: <http://edfluminus.edf.com/developpement-durable/sante-securite-et-environnement-88507.html>

- ☒ **Inclusion of minimum environmental standards in contracts with suppliers and other relevant business partners**

EDF Luminus general purchasing conditions include a specific clause regarding Environment. See below.

24.1. Environmental clause - To respond to sustainable development issues, EDF Luminus has set the target of controlling environmental impact and obtaining and maintaining NF EN ISO 14001 certification for all its activities (production, distribution, engineering, etc.).

Under its environmental policy, EDF Luminus has undertaken commitments, particularly for:

- saving non-renewable resources;
- preventing pollution and controlling greenhouse gas emissions;
- improving health and safety.

In particular, EDF Luminus is a stakeholder in this approach for continuous improvement by also seeking ISO 14001 certification for its main sites. EDF Luminus has therefore undertaken, in the process of contracting and execution of its contracts, to identify the key points regarding respect for the environment and in particular those relating to waste control and the use of chemical products. As a result, the Contractor shall be reminded, and shall pass this on to his Subcontractors and suppliers, that the execution of the Agreement must strictly comply with the applicable regulations in that respect.

As part of his duty as an advisor to EDF Luminus and to allow EDF Luminus to respect its commitments regarding ISO 14001 certification, the Contractor is also requested, in the context of execution of the Agreement, to send to EDF Luminus any relevant information regarding respect for the environment (existing commitments, planned action for progress, reduction or prevention of impacts obtained, etc.) and to warn it of any circumstance likely to have a significant impact on the environment.

The duty of advisor, like the obligations required of the Contractor pursuant to the present clause 24.1, shall be assessed with regard to and within the limits of the missions entrusted to him in accordance with his specific competences.

There is a scoring system in place for suppliers before they can participate to a tender, which includes qualitative criteria, such as safety incidents frequency rate.

- ☒ **Specific commitments and goals for specified years**

EDF Luminus has a specific target each year for its investments in wind turbines. In 2013, three permit requests were deposited for a total of 20MW. Overall number of windmills in the EDF Luminus installed base included 60 windmills end of 2013 (124 MW). Some of those windmills are located on industrial areas and the electricity used by business partners, which helps with minimizing the potential impact of windmills on biodiversity, thus speeding up the permitting process.

We also take into account EDF Group CSR commitments, which apply to EDF Luminus, regarding the publication of such numbers each year. See page 6 of <http://rapport-dd-2013.edf.com.edf-partage-web-02-natpub.edf.lbn.fr/resources/ParagPdf/99/en-US/PdfFile.pdf>

- ☐ Other established or emerging best practices

i Specify in under 255 characters, including spaces. Alternatively, indicate if your COP does not address this criterion but explains the reason for omission (e.g., criterion deemed immaterial, legal prohibitions, privacy, competitive advantage).

- ☐ Any relevant policies, procedures, and activities that the company **plans to undertake by its next COP** to fulfill this criterion, including goals, timelines, metrics, and responsible staff

i This option is for companies that have not yet begun to implement this criterion, but transparently and thoroughly disclose future plans to progress in this area in their COP.

Criterion 10: The COP describes effective *management systems* to integrate the environmental principles

Indicate which of the following best practices are described in your COP:

- ☒ Environmental risk and impact assessments

EDF Luminus does integrate environmental risk evaluation in its Health, Safety & Environment risk analysis for all industrial sites. Risks are classified in 4 categories for all production sites. All risks above a certain threshold have to be reduced. Also, impact on environment has to be assessed prior to each new production asset building (as part of the permitting process).

- ☒ Assessments of lifecycle impact of products, ensuring environmentally sound management policies

In 2013, EDF Luminus published its global carbon footprint for the first time. This allows the company to prioritize actions to reduce the environmental impact of its activities. See pages 22-23-24 of the EDF Luminus 2013 Sustainable Development report.

- ☒ Allocation of responsibilities and accountability within the organisation

Allocation of responsibilities and accountability within the organization is part of the HSE management system. HSE and Production organizations are available to employees via the intranet.

- ☒ Internal awareness-raising and training on environmental stewardship for management and employees

The Health, Safety & Environment department of EDF Luminus prepares weekly messages dedicated to Safety and Environment. These are highlighted each week on the intranet, and at the beginning of each meeting. Specific presentations are also prepared for specific topics and have to be shared every quarter during "toolbox meetings" which are mandatory and tracked.

- ☒ Grievance mechanisms, communication channels and other procedures (e.g. whistleblower mechanisms) for reporting concerns or seeking advice regarding environmental impacts

The ethical alert system described above can also be used for environmental impacts.

- ☐ Other established or emerging best practices

i Specify in under 255 characters, including spaces. Alternatively, indicate if your COP does not address this criterion but explains the reason for omission (e.g., criterion deemed immaterial, legal prohibitions, privacy, competitive advantage).

- ☐ Any relevant policies, procedures, and activities that the company **plans to undertake by its next COP** to fulfill this criterion, including goals, timelines, metrics, and responsible staff

i This option is for companies that have not yet begun to implement this criterion, but transparently and thoroughly disclose future plans to progress in this area in their COP.

Criterion 11: The COP describes effective *monitoring and evaluation mechanisms* for environmental stewardship

Indicate which of the following best practices are described in your COP:

- ☒ System to track and measure performance based on standardized performance metrics

Compliance checks are done regularly. Periodic environmental audits are performed by external companies. We also take measures to solve the detected non conformities.

- ☒ Leadership review of monitoring and improvement results

This is done at the level of the Executive Committee on a quarterly basis. Detailed review once a year.

- ☒ Process to deal with incidents

This is part of the management system.

We have a specific crisis management plan to manage environmental and other types of crises. This plan has two main components: an emergency plan (site specific, technical-oriented) and a crisis management plan (at company level).

- ☐ Audits or other steps to monitor and improve the environmental performance of companies in the supply chain

- ☒ Outcomes of integration of the environmental principles

- i** To report main incidents involving the company, disclosure that your organization had no environmental incidents in the past year satisfies this best practice. Suggested GRI Indicators: EN 1-3, 5-6, 8, 10, 13, 16, 18-20, 26-27.

There were no environmental incidents involving EDF Luminus in 2013. Environmental incidents have to be reported to the Belgian authorities. The environment management system of EDF Luminus includes a systematic analysis of incidents and a list of corrective actions to be implemented. GRI indicators published in the 2013 Sustainable Development report include G4-EN8 and G4 EN16 (see page 55).

- ☐ Other established or emerging best practices

- i** Specify in under 255 characters, including spaces. Alternatively, indicate if your COP does not address this criterion but explains the reason for omission (e.g., criterion deemed immaterial, legal prohibitions, privacy, competitive advantage).

- ☐ Any relevant policies, procedures, and activities that the company **plans to undertake by its next COP** to fulfill this criterion, including goals, timelines, metrics, and responsible staff

- i** This option is for companies that have not yet begun to implement this criterion, but transparently and thoroughly disclose future plans to progress in this area in their COP.

Robust Anti-Corruption Management Policies & Procedures

i Criteria and best practices under Anti-Corruption implementation have been modified to reflect the Anti-Corruption Reporting Guidance. Best practices reflect specific reporting elements of the guidance, either Basic (numbers starting with B) or desired (numbers starting with D).

Criterion 12: The COP describes robust *commitments, strategies or policies* in the area of anti-corruption

Indicate which of the following best practices are described in your COP:

- ☒ Publicly stated formal policy of zero-tolerance of corruption (D1)

EDF Luminus Code of Conduct includes:

- A clear statement by CEO regarding Ethics, values and respect for stakeholders
- The EDF Group Code of Ethics which includes a clear statement about “fight against fraud and corruption in all its forms”

- ☒ Commitment to be in compliance with all relevant anti-corruption laws, including the implementation of procedures to know the law and monitor changes (B2)

We do monitor law evolution as part of the “business as usual” practices.

- ☐ Statement of support for international and regional legal frameworks, such as the UN Convention against Corruption (D2)
- ☐ Detailed policies for high-risk areas of corruption (D4)

- ☒ Policy on anti-corruption regarding business partners (D5)

We do have anti-corruption rules regarding business partners, which are mentioned in EDF Luminus Code of Conduct. Suppliers can use a specific mailbox to report non-ethical conduct relating to current or future contracts (cf <http://edfluminus.edf.com/developpement-durable/ethique-292351.html>). Also, EDF Luminus has an anti-fraud plan with a specific alert system which warrants the anonymity of whistle blowers.

- ☐ Other established or emerging best practices

i Specify in under 255 characters, including spaces. Alternatively, indicate if your COP does not address this criterion but explains the reason for omission (e.g., criterion deemed immaterial, legal prohibitions, privacy, competitive advantage).

- ☐ Any relevant policies, procedures, and activities that the company **plans to undertake by its next COP** to fulfill this criterion, including goals, timelines, metrics, and responsible staff

Criterion 13: The COP describes effective *management systems* to integrate the anti-corruption principle

Indicate which of the following best practices are described in your COP:

- ☒ Support by the organization’s leadership for anti-corruption (B4)

See above our answer for Criterion 12.

- ☒ Carrying out risk assessment of potential areas of corruption (D3)

In 2013, a suppliers’ cartography was established, in order to identify suppliers with the highest risks (see SD report 2013 page 19). Two suppliers will be audited before December 31, 2014.

- ☒ Human Resources procedures supporting the anti-corruption commitment or policy, including communication to and training for all employees (B5 + D8)

Human Resources procedures supporting anti-corruption policy include the company rules & Code of Conduct. Those documents are presented to all new employees.

- ☐ Internal checks and balances to ensure consistency with the anti-corruption commitment (B6)

- ☐ Actions taken to encourage business partners to implement anti-corruption commitments (D6)

- ☒ Management responsibility and accountability for implementation of the anti-corruption commitment or policy (D7)

Management is indeed accountable for implementing the anti-corruption policy. The fraud policy is accessible to all employees on the company's intranet.

- ☒ Communications (whistleblowing) channels and follow-up mechanisms for reporting concerns or seeking advice (D9)

There is an alert system to report concerns, both for employees and suppliers. It's been advertised each year since 2012. See EDF Luminus Code of Conduct on page 27 (the address is: internal.audit@edfluminus.be).

- ☒ Internal accounting and auditing procedures related to anticorruption (D10)

Internal controls occur regularly, performed by the Audit department. There is also an overall yearly risk assessment, which includes fraud & corruption topics. See page 9 of the Sustainable Development report for 2013.

- ☐ Other established or emerging best practices

- ☒ Specify in under 255 characters, including spaces. Alternatively, indicate if your COP does not address this criterion but explains the reason for omission (e.g., criterion deemed immaterial, legal prohibitions, privacy, competitive advantage).

- ☐ Any relevant policies, procedures, and activities that the company **plans to undertake by its next COP** to fulfill this criterion, including goals, timelines, metrics, and responsible staff

Criterion 14: The COP describes effective *monitoring and evaluation mechanisms* for the integration of anti-corruption

Indicate which of the following best practices are described in your COP:

- ☒ Leadership review of monitoring and improvement results (D12)

An internal assessment of all alert systems is done each year.

- ☒ Process to deal with incidents (D13)

The anti-fraud plan includes a process to deal with incidents which is briefly described in EDF Luminus Code of conduct page 26. All incidents reported are investigated and generate corrective measures if needed.

- ☒ Public legal cases regarding corruption (D14)

There are no public legal cases regarding corruption registered at EDF Luminus in 2013.

- ☐ Use of independent external assurance of anti-corruption programmes (D15)

- ☐ Outcomes of integration of the anti-corruption principle

- ☒ Outcomes of assessments of potential corruption (D3) and mechanisms for seeking advice /reporting (D9). Procedures supporting anti-corruption policy. Disclosure that your organization had no incidents suffices where providing details is counterproductive. GRI indicators SO2-4. NO.

- ☐ Other established or emerging best practices

- ☒ Specify in under 255 characters, including spaces. Alternatively, indicate if your COP does not address this criterion but explains the reason for omission (e.g., criterion deemed immaterial, legal prohibitions, privacy, competitive advantage).

- ☐ Any relevant policies, procedures, and activities that the company **plans to undertake by its next COP** to fulfill this criterion, including goals, timelines, metrics, and responsible staff

- ☒ This option is for companies that have not yet begun to implement this criterion, but transparently and thoroughly disclose future plans to progress in this area in their COP.

Taking Action in Support of Broader UN Goals and Issues

⊕ "Broader UN Goals and Issues" refers to an array of global issues - based on the most acute or chronic global challenges - including:

Peace & Security	Migration
Millennium Development Goals	Food Security
Human Rights	Sustainable Ecosystems and Biodiversity
Children's Rights	Climate Change Mitigation and Adaptation
Gender Equality	Water Security and Sanitation
Health	Employment and Decent Working Conditions
Education	Anti-Corruption
Humanitarian Assistance	

For a list of further Global Issues that are relevant to the work of the UN as well as business, please refer to business.un.org

Criterion 15: The COP describes core business contributions to UN goals and issues

Indicate which of the following best practices are described in your COP:

- ☒ Align core business strategy with one or more relevant UN goals/issues

EDF Luminus strategy takes into account explicitly the following global challenges:

- Climate change mitigation and adaptation (see page
- Sustainable ecosystems and biodiversity
- Gender equality (see page).

- ☒ Develop relevant products and services or design business models that contribute to UN goals/issues

EDF Luminus products and services contribute to climate change mitigation and adaptation. See pages 28-32 of the 2013 Sustainable Development report about offers to B2C & B2B customers and sustainable cities (ie. Energy monitoring, YouBalance offer, paperless bills, green contracts, etc.).

- ☐ Adopt and modify operating procedures to maximize contribution to UN goals/issues
- ☐ Other established or emerging best practices

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- ☐ Any relevant policies, procedures, and activities that the company **plans to undertake by its next COP** to fulfill this criterion, including goals, timelines, metrics, and responsible staff

Criterion 16: The COP describes strategic social investments and philanthropy

Indicate which of the following best practices are described in your COP:

- ☒ Pursue social investments and philanthropic contributions that tie in with the core competencies or operating context of the company as an integrated part of its sustainability strategy

The EDF Luminus sustainable report highlights some of the philanthropic contributions of the Company. See the "We Love Your Project" program on page 54.

- ☐ Coordinate efforts with other organizations and initiatives to amplify—and not negate or unnecessarily duplicate—the efforts of other contributors
- ☐ Take responsibility for the intentional and unintentional effects of funding and have due regard for local customs, traditions, religions, and priorities of pertinent individuals and groups
- ☐ Other established or emerging best practices

i Specify in under 255 characters, including spaces. Alternatively, indicate if your COP does not address this criterion

but explains the reason for omission (e.g., criterion deemed immaterial, legal prohibitions, privacy, competitive advantage).

- ☐ Any relevant policies, procedures, and activities that the company **plans to undertake by its next COP** to fulfill this criterion, including goals, timelines, metrics, and responsible staff

i *This option is for companies that have not yet begun to implement this criterion, but transparently and thoroughly disclose future plans to progress in this area in their COP.*

Criterion 17: The COP describes advocacy and public policy engagement

Indicate which of the following best practices are described in your COP:

- ☒ Publicly advocate the importance of action in relation to one or more UN goals/issues

The EDF Group participated to the Global Compact International Yearbook for 2014. See pages 120-121 which are focused on biodiversity.

- ☐ Commit company leaders to participate in key summits, conferences, and other important public policy interactions in relation to one or more UN goals/issues
- ☐ Other established or emerging best practices

i *Specify in under 255 characters, including spaces. Alternatively, indicate if your COP does not address this criterion but explains the reason for omission (e.g., criterion deemed immaterial, legal prohibitions, privacy, competitive advantage).*

- ☐ Any relevant policies, procedures, and activities that the company **plans to undertake by its next COP** to fulfill this criterion, including goals, timelines, metrics, and responsible staff

i *This option is for companies that have not yet begun to implement this criterion, but transparently and thoroughly disclose future plans to progress in this area in their COP.*

Criterion 18: The COP describes partnerships and collective action

Indicate which of the following best practices are described in your COP:

- ☒ Develop and implement partnership projects with public or private organizations (UN entities, government, NGOs, or other groups) on core business, social investments and/or advocacy

Partnerships with NGOs are described on page 25 and 54 of the Sustainable Development report for 2013.

- ☐ Join industry peers, UN entities and/or other stakeholders in initiatives contributing to solving common challenges and dilemmas at the global and/or local levels with an emphasis on initiatives extending the company's positive impact on its value chain
- ☐ Other established or emerging best practices

i *Specify in under 255 characters, including spaces. Alternatively, indicate if your COP does not address this criterion but explains the reason for omission (e.g., criterion deemed immaterial, legal prohibitions, privacy, competitive advantage).*

- ☐ Any relevant policies, procedures, and activities that the company **plans to undertake by its next COP** to fulfill this criterion, including goals, timelines, metrics, and responsible staff

i *This option is for companies that have not yet begun to implement this criterion, but transparently and thoroughly disclose future plans to progress in this area in their COP.*

Corporate Sustainability Governance and Leadership

Criterion 19: The COP describes CEO commitment and leadership

Indicate which of the following best practices are described in your COP:

- ☒ CEO publicly delivers explicit statements and demonstrates personal leadership on sustainability and commitment to the UN Global Compact

The EDF Luminus Sustainable Development report for 2013 highlights the commitment of the CEO to the UN Global Compact. See pages 10, 11, 13 and 19. The report itself is structured in line with the 5 pillars of the CSR policy of the company: ethics, customer satisfaction, profitability, environment and people issues.

- ☐ CEO promotes initiatives to enhance sustainability of the company's sector and leads development of industry standards

- ☒ CEO leads executive management team in development of corporate sustainability strategy, defining goals and overseeing implementation

As explained on page 19 of our Sustainable Development report for 2013, the Executive committee of EDF Luminus monitors the implementation of the CSR policy of EDF Luminus regularly, as part of the Transformation plan of the company. In 2013, CSR-related initiatives were reviewed quarterly by the Executive Committee.

- ☐ Make sustainability criteria and UN Global Compact principles part of goals and incentive schemes for CEO and executive management team
- ☐ Other established or emerging best practices

i Specify in under 255 characters, including spaces. Alternatively, indicate if your COP does not address this criterion but explains the reason for omission (e.g., criterion deemed immaterial, legal prohibitions, privacy, competitive advantage).

- ☐ Any relevant policies, procedures, and activities that the company **plans to undertake by its next COP** to fulfill this criterion, including goals, timelines, metrics, and responsible staff

Criterion 20: The COP describes Board adoption and oversight

Indicate which of the following best practices are described in your COP:

- ☒ Board of Directors (or equivalent) assumes responsibility and oversight for long-term corporate sustainability strategy and performance

See Board statement on pages 8-9 of the 2013 Sustainable Development report.

- ☐ Board establishes, where permissible, a committee or assigns an individual board member with responsibility for corporate sustainability.
- ☐ Board (or committee), where permissible, approves formal reporting on corporate sustainability (Communication on Progress)
- ☐ Other established or emerging best practices

i Specify in under 255 characters, including spaces. Alternatively, indicate if your COP does not address this criterion but explains the reason for omission (e.g., criterion deemed immaterial, legal prohibitions, privacy, competitive advantage).

- ☐ Any relevant policies, procedures, and activities that the company **plans to undertake by its next COP** to fulfill this criterion, including goals, timelines, metrics, and responsible staff

Criterion 21: The COP describes stakeholder engagement

Indicate which of the following best practices are described in your COP:

- ☐ Publicly recognize responsibility for the company's impacts on internal and external stakeholders
- ☐ Define sustainability strategies, goals and policies in consultation with key stakeholders
 - i** Regular stakeholder consultations in the area of human rights, labour, environment and anti -corruption. List of stakeholder groups engaged by the organization. Develop process for identifying key stakeholders and report on outcomes of consultation.
- ☐ Consult stakeholders in dealing with implementation dilemmas and challenges and invite them to take active part in reviewing performance
- ☒ Establish channels to engage with employees and other stakeholders to hear their ideas and address their concerns, and protect 'whistle-blowers'

The Sustainable Development report for 2013 describes different existing channels used by EDF Luminus to hear the concerns and ideas of external stakeholders. See pages 20-21: CREG General Council; public hearings for windmill projects; CSR barometer.

The Ethical Charter of the EDF Group includes a whistle-blower mechanism available to all stakeholders, internal and external.

- ☐ Other established or emerging best practices
 - i** Specify in under 255 characters, including spaces. Alternatively, indicate if your COP does not address this criterion but explains the reason for omission (e.g., criterion deemed immaterial, legal prohibitions, privacy, competitive advantage).

- ☐ Any relevant policies, procedures, and activities that the company **plans to undertake by its next COP** to fulfill this criterion, including goals, timelines, metrics, and responsible staff
 - i** This option is for companies that have not yet begun to implement this criterion, but transparently and thoroughly disclose future plans to progress in this area in their COP.

ANNEX: Business & Peace

This annex is not relevant since EDF Luminus is active in Belgium only, i.e. not in high-risk and/or conflict-affected areas.

The COP describes policies and practices related to the company's core business operations in high - risk or conflict-affected areas

Indicate which of the following best practices are described in your COP:

- ☐ Information on how policies, strategies and operating practices have been adapted to the specific high-risk/conflict context based on due diligence
- ☐ Adherence to best practices even where national law sets a lower standard, including in the management of security services
- ☐ Management of the supply chain to avoid contributing to conflict through purchasing decisions and practices
- ☐ Other established or emerging best practices
- ☒ *Specify in under 255 characters, including spaces. Alternatively, indicate if your COP does not address this criterion but explains the reason for omission (e.g., criterion deemed immaterial, legal prohibitions, privacy, competitive advantage).*

- ☐ Any relevant policies, procedures, and activities that the company **plans to undertake by its next COP** to fulfill this criterion, including goals, timelines, metrics, and responsible staff

The COP describes policies and practices related to the company's government relations in high -risk or conflict-affected areas

Indicate which of the following best practices are described in your COP:

- ☐ Assessment of opportunities for constructive engagement with government actors in order to support peace
- ☐ Measures undertaken to avoid complicity in human rights violations by government actors
- ☐ Management practices aimed at preventing corrupt relationships with government officials
- ☐ Other established or emerging best practices
- ☒ *Specify in under 255 characters, including spaces. Alternatively, indicate if your COP does not address this criterion but explains the reason for omission (e.g., criterion deemed immaterial, legal prohibitions, privacy, competitive advantage).*

- ☐ Any relevant policies, procedures, and activities that the company **plans to undertake by its next COP** to fulfill this criterion, including goals, timelines, metrics, and responsible staff

The COP describes local stakeholder engagement and strategic social investment activities of the company in high-risk or conflict-affected areas

Indicate which of the following best practices are described in your COP:

- ☐ Stakeholder engagement mechanisms across company and contractor operations
- ☐ Approaches to stakeholder engagement involving civil society, international organizations, etc
- ☐ Actions toward constructive and peaceful company-community engagement
- ☐ Sustainable social investment projects
- ☐ Other established or emerging best practices
- ☒ *Specify in under 255 characters, including spaces. Alternatively, indicate if your COP does not address this criterion but explains the reason for omission (e.g., criterion deemed immaterial, legal prohibitions, privacy, competitive advantage).*

- ☐ Any relevant policies, procedures, and activities that the company **plans to undertake by its next COP** to fulfill this criterion, including goals, timelines, metrics, and responsible staff