



Date 08/09/2018

## **Communication on Progress – ENGIE and Global Compact**

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**Category Global Compact Advanced Company**

**September 2018**

This document shows the correspondence between the information contained in ENGIE 2018 Integrated Report published in May 2018 and the 21 'GC Advanced' criteria of the Global Compact.

The following sources are also associated with the correspondence grid:

- the ENGIE 2017 Registration Document published in March 2018
- the ENGIE website: [www.engie.com](http://www.engie.com)
- previous Integrated reports and Registration documents when necessary



## Self Evaluation

1. Does your COP contain, if applicable, a description of policies and practices related to your business operations in high risk areas and / or affected by conflict ?

Not applicable

2. How are the accuracy and scope of information in your COP evaluated by a credible third party?

2018 Integrated Report and 2017 Registration Document contain financial, environmental, social and governance information of the Group. This information is annually audited by the Statutory Auditors. Their report is available in 2017 Registration Document pages 100 to 104:

[https://www.engie.com/wp-content/uploads/2018/06/engie\\_document-de-reference-2017\\_en\\_pour-site-rse-attestation-des-cac1.pdf](https://www.engie.com/wp-content/uploads/2018/06/engie_document-de-reference-2017_en_pour-site-rse-attestation-des-cac1.pdf)

3. Does your COP incorporate high standards of transparency and disclosure?

2018 Integrated Report learns from the reference framework of the International Integrated Report Council (see 2018 Integrated Report page 1).

The Group published its first report in November 2014.

The 2018 Integrated Report was published in May 2018 at the Group Annual Meeting.

<https://library.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&l=en&p=2>



## I. Implementing the ten principles into strategies and operations

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

<p>The Group updated in November 2017 its Corporate Social Responsibility Policy to align it with the Group's policies in various areas (including the environment, HR, ethics and procurement, ...).</p>	<p><a href="https://www.engie.com/wp-content/uploads/2018/06/engie_rse_en_imp1.pdf">https://www.engie.com/wp-content/uploads/2018/06/engie_rse_en_imp1.pdf</a></p>
<p>CSR is governed at the very highest level within ENGIE Group: by the Board of Directors' Ethics, Environment and Sustainable Development Committee, the Group's Management Committee, and the CSR Executive Committee.</p> <p>The Group Executive Committee (COMEX) devotes two meetings per year, totally dedicated to Environmental and Social Responsibility.</p>	<p>Cf.2018 Integrated Report page 28:</p> <p><a href="https://library.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;p=30&amp;lc=0">https://library.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;p=30&amp;lc=0</a></p> <p>Cf.2017 Registration Document page 126 :</p> <p><a href="https://library.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45/#v=Version1&amp;l=en&amp;p=128&amp;lc=0">https://library.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45/#v=Version1&amp;l=en&amp;p=128&amp;lc=0</a></p> <p>Cf ENGIE.com:</p> <p><a href="https://www.engie.com/en/group/governance/board-directors/board-committees/">https://www.engie.com/en/group/governance/board-directors/board-committees/</a></p>
<p>The CSR Executive Committee implements the CSR policy, ensures that Corporate and the Group's various Business Units share and build on their experiences, and manages exchanges on environmental and social responsibility strategies.</p> <p>The Committee meets on a monthly basis under the chairmanship of the Group CSR Director and is made up of:</p> <ul style="list-style-type: none"> <li>- the Business Unit CSR Responsibility managers (one in each BU, member of the Management Committee of the Business Unit)</li> <li>- members of the Corporate CSR Department</li> </ul> <p>Two committees chaired by the CSR Department were created in 2017:</p> <ul style="list-style-type: none"> <li>• The Green Bond Committee, a transversal Committee responsible for validating projects that could be financed by Green Bonds issued by the Group</li> <li>• the vigilance Committee set up to ensure the establishment and monitoring of vigilance plans in the framework of the duty of vigilance law</li> </ul> <p>More broadly, the CSR Department has also launched a network of CSR ambassadors open to all employees of the Group.</p>	<p>Cf. ENGIE.com :</p> <p><a href="https://www.engie.com/en/analysts/governance/csr-department-governance/">https://www.engie.com/en/analysts/governance/csr-department-governance/</a></p>



<p>In May 2014, ENGIE issued a green bond for a total amount of €2.5 billion. The funds raised helped finance the Group's development of renewable energy and energy efficiency projects. Eligible projects were selected on the basis of a number of environmental and social criteria established in partnership with the agency Vigeo.</p> <p>In 2016, the totality of the funds were allocated to eligible projects and it helped to finance 77 projects in the fields of renewable energy and energy efficiency.</p> <p>In March 2017, the Group issued its new Green Bond of €1,5 billion. To be eligible, projects financed must meet a number of environmental and social criteria in eight areas : fight against climate change and the conservation of the natural resources, environmental management, biodiversity, dialogue with stakeholders, business ethics, human rights, responsible procurement and health and safety. These criteria were developed by ENGIE, reviewed by Vigeo Eiris and are published on ENGIE website.</p> <p>Bond issue proceeds will be allocated according to a specific traceability procedure that will be verified by an external audit firm. In the spirit of continuous improvement and contribution to best practices, the Group took on the occasion of this Green Bond as an opportunity to further commit on the reporting and the transparency of the allocation process.</p> <p>In September 2017, ENGIE issued its third Green Bond for a total amount of € 1.25 billion. This loan will contribute to financing the Group's development in renewable energy projects, energy efficiency and the preservation of natural resources, as well as R &amp; D investments in these areas and equity investments in the social impact fund projects of ENGIE: "Rassembleurs Energies".</p> <p>In January 2018, ENGIE issued a fourth green bond for € 1 billion.</p>	<p>Cf. 2017 Registration Document pages 176 to 179 :  <a href="https://library.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45/#v=Version1&amp;l=en&amp;p=178&amp;lc=0">https://library.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45/#v=Version1&amp;l=en&amp;p=178&amp;lc=0</a></p> <p>Cf. ENGIE.com:  <a href="https://www.engie.com/en/analysts/sustainable-finance/green-bond/">https://www.engie.com/en/analysts/sustainable-finance/green-bond/</a></p>
<p>The Group applies ten non-financial criteria relating to ethics, CO<sub>2</sub> emissions, social impact, human resources, environmental management of ecosystems, stakeholder involvement, local purchasing and health and safety to all of its investment projects. Furthermore, the Group takes account of the CO<sub>2</sub> cost of its investments. These criteria are presented, analyzed and evaluated for each new investment project of a certain amount.</p>	<p>Cf.: ENGIE.com :  <a href="https://www.engie.com/en/analysts/sustainable-finance/csr-criteria/">https://www.engie.com/en/analysts/sustainable-finance/csr-criteria/</a></p>



**Criterion 2 : COP describes value chain implementation**

<p>ENGIE's Purchasing and Procurement Policy outlines the principles that apply to managing supplier relations in accordance with the Group's commitments to ethical behaviour and social responsibility, particularly with regard to diversity and disability. The policy is driven by three core objectives: contributing to ENGIE's performance, acting as a model for creating synergies within the Group, and being an ambassador for the company's values in dealings with suppliers by encouraging them to sign up to the UN Global Compact, among other things.</p>	<p>Cf ENGIE procurement policy updated in May 2016 : <a href="http://www.engie.com/wp-content/uploads/2016/05/procurement-policy-engie.pdf/">http://www.engie.com/wp-content/uploads/2016/05/procurement-policy-engie.pdf/</a></p> <p>2017 Integrated Report pages 33-34 : <a href="http://library.engie.com/uid_9b091935-66a4-48c6-9bdc-54982f2600b0/beevirtua/beevirtua.html#app=3d20&amp;9557-source=xmlConfs/init.xml&amp;adf3-lang=en&amp;ccb3-pageId=34">http://library.engie.com/uid_9b091935-66a4-48c6-9bdc-54982f2600b0/beevirtua/beevirtua.html#app=3d20&amp;9557-source=xmlConfs/init.xml&amp;adf3-lang=en&amp;ccb3-pageId=34</a></p>
<p>ENGIE has adopted ACESIA, a platform for evaluating suppliers' CSR performance. The tool, which was developed by AFNOR Solutions Achats, analyses suppliers' responses to 25 environmental and 13 social indicators. The data are used for purposes such as monitoring suppliers' compliance with legislation and fulfilling the Group's obligations to be vigilant, notably for issues such as illegal work, waste management and transport. As well as highlighting best practices, ACESIA also fosters innovation by encouraging suppliers to commit to a specific action plan, which it generates automatically based on their responses to the indicators. Moreover, hundreds of suppliers of the Group completed a self-assessment CSR questionnaire, this approach has been extended to 500 suppliers in 2016.</p>	<p><a href="http://www.engie.com/en/analysts/actions/principle-2-acting-responsibly/responsible-purchasing/">http://www.engie.com/en/analysts/actions/principle-2-acting-responsibly/responsible-purchasing/</a></p>
<p>An online training programme targeting all of ENGIE's sales teams has been launched to explain what 'responsible purchasing' means, help users find out more about ENGIE's efforts in the field and identify the best way of making a contribution to the Group's commitments. The programme's modules define a range of concepts including sustainable development, corporate social responsibility (CSR) and responsible purchasing, detail the Group's activities in the field and explain how to integrate CSR into every stage of the procurement process, whilst taking account of statements of need, the life-cycle approach and labels. Last but not least, the training programme addresses disability issues and relations with companies from the 'adapted and protected' sector. In 2015, more than 400 buyers attended the training on sustainable procurement.</p>	<p><a href="http://www.engie.com/en/analysts/actions/principle-2-acting-responsibly/responsible-purchasing/">http://www.engie.com/en/analysts/actions/principle-2-acting-responsibly/responsible-purchasing/</a></p>
<p>ENGIE has set up a supplier portal that enables innovative SMEs to publicise themselves and get included in ENGIE's supplier pool.</p>	<p><a href="http://www.engie.com/en/commitments/procurement/relationships-with-smes/">http://www.engie.com/en/commitments/procurement/relationships-with-smes/</a></p>



**Implementing the ten principles into strategies and operations :  
Reliable policies and procedures concerning human rights  
Human rights:**

- Principle 1 : Businesses should support and respect the protection of internationally proclaimed human rights
- Principle 2 : Businesses should make sure that they are not complicit in human rights abuses

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

<p>The Group's commitment to human rights is shown in its ethical principles. This commitment is presented in the Ethics charter and the Practical guide to ethics. The <b>"Human Rights" referential and policy</b> comprise ENGIE's commitments to respect internationally-recognized human rights and specifies the operational processes for analyzing and managing risks so that the Group can be vigilant about the impact of its activities on the human rights of all individuals.</p> <p>The human rights referential was adopted in May 2014. In 2017, the Group redefined its Human Rights referential and policy. The referential and policy are the cornerstones of the human rights component of the Group's vigilance plan which the Group defined in January 2018 and which addresses the provisions of the French law on the duty of vigilance.</p> <p>They complement the Group's existing actions related to the respect for human rights.</p>	<p>2017 Integrated Report - "An ambitious commitment to ethics and compliance" (p.31) <a href="https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rapport%20integré&amp;p=32&amp;lc=0">https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rapport%20integré&amp;p=32&amp;lc=0</a></p> <p>2017 Registration Document - "4.4.4 Reference texts" (p.131) <a href="https://horizonlibrary.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45#v=Version1&amp;l=en&amp;p=132&amp;lc=0">https://horizonlibrary.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45#v=Version1&amp;l=en&amp;p=132&amp;lc=0</a></p> <p>2017 Registration Document - "4.5 Vigilance plan" (p.133) <a href="https://horizonlibrary.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45#v=Version1&amp;l=en&amp;p=134&amp;lc=0">https://horizonlibrary.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45#v=Version1&amp;l=en&amp;p=134&amp;lc=0</a></p> <p>Ethics charter <a href="https://library.engie.com/uid_bf06d0f9-89de-4f27-b8f6-b08f5bf9d4ce#app=3d20&amp;l=en&amp;p=0&amp;9557-source=xmlConfs/init.xml&amp;v=Version1&amp;lc=0">https://library.engie.com/uid_bf06d0f9-89de-4f27-b8f6-b08f5bf9d4ce#app=3d20&amp;l=en&amp;p=0&amp;9557-source=xmlConfs/init.xml&amp;v=Version1&amp;lc=0</a></p> <p>Practical guide to ethics <a href="https://library.engie.com/uid_204082eb-b4f4-4070-a387-fe759559aaf2#app=3d20&amp;9557-source=xmlConfs/init.xml&amp;l=en&amp;p=0&amp;v=Version1">https://library.engie.com/uid_204082eb-b4f4-4070-a387-fe759559aaf2#app=3d20&amp;9557-source=xmlConfs/init.xml&amp;l=en&amp;p=0&amp;v=Version1</a></p>
<p>The Human Rights referential and policy explain the Group's commitments; the first one is to "respect all internationally recognized human rights", as defined by international treaties. They then specify commitments regarding rights of employees and of local communities.</p>	<p>engie.com internet website <a href="http://www.engie.com/en/group/ethics-compliance/human-rights-referential/">http://www.engie.com/en/group/ethics-compliance/human-rights-referential/</a></p>
<p>The Human Rights referential and policy apply to all employees . They also ask Group's business relationships to respect its own commitments, through a contractual provision.</p>	<p>2017 Registration Document -"4.4.6 Training and awareness" (p.131) <a href="https://horizonlibrary.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45#v=Version1&amp;l=en&amp;p=132&amp;lc=0">https://horizonlibrary.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45#v=Version1&amp;l=en&amp;p=132&amp;lc=0</a> engie.com internet website</p>



<p>Since October 2016, an e-learning module “Business and Human Rights” is available to all Group employees to present them the Group’s approach and commitments regarding human rights.</p>	<p><a href="http://www.engie.com/en/group/ethics-compliance/training/">http://www.engie.com/en/group/ethics-compliance/training/</a></p>
<p>The Human Rights referential is public and freely available on the Group’s website. It was communicated to all senior executives and to all ethics and compliance officers who are in charge of its distribution and implementation.</p> <p>The Human Rights referential and policy redefined in 2017, will be made public in 2018.</p> <p>The Human Rights referential and policy are the result of a broad consultation with operational entities and support functions. They complement specific human rights policies (such as health &amp; safety or responsible procurement) and aim to promote a proactive and global human rights approach.</p> <p>They are based on the United Nations Guiding Principles on business and human rights recommendations.</p>	<p>engie.com internet website  <a href="http://www.engie.com/en/group/ethics-compliance/human-rights-referential/">http://www.engie.com/en/group/ethics-compliance/human-rights-referential/</a></p>
<p>The Group is a founding member of the association EDH (“companies for human rights”). EDH aims to improve integration of human rights into companies’ policies and practices, especially by the operational implementation of the UN Guiding Principles.</p>	<p>engie.com internet website  <a href="http://www.engie.com/en/group/ethics-compliance/references-and-memberships/">http://www.engie.com/en/group/ethics-compliance/references-and-memberships/</a></p> <p>EDH website  <a href="http://www.e-dh.org">www.e-dh.org</a></p>
<p>ENGIE is also a founding member of Bettercoal, a worldwide initiative aiming to promote continuous improvement of responsibility in the international coal supply chain, in particular regarding ethics, social and environmental responsibility and human rights.</p>	<p><a href="http://www.bettercoal.org">www.bettercoal.org</a></p>

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

<p>The Human Rights referential and policy provide for the implementation of operational processes to ensure effective implementation of the Group’s commitments. They ask for a due diligence approach by systematic human rights risks assessment.</p>	<p>2018 Integrated Report -“An ambitious commitment to ethics and compliance” (p.31)  <a href="https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rapport%20integre&amp;p=32&amp;lc=0">https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rapport%20integre&amp;p=32&amp;lc=0</a></p> <p>2018 Integrated Report -“Strengthening confidence in the company” (p.40)  <a href="https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rapport%20integre&amp;p=42&amp;lc=0">https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rapport%20integre&amp;p=42&amp;lc=0</a></p> <p>2017 Registration Document -“4.4.4 Reference texts” (p.131)  <a href="https://horizonlibrary.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45#v=Version1&amp;l=en&amp;p=132&amp;lc=0">https://horizonlibrary.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45#v=Version1&amp;l=en&amp;p=132&amp;lc=0</a></p>
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	<p>engie.com internet website  <a href="http://www.engie.com/en/group/ethics-compliance/human-rights-referential/">http://www.engie.com/en/group/ethics-compliance/human-rights-referential/</a></p>
<p>Human rights are specifically identified as a Group ethical risk and so are assessed annually. Human rights are also screened in country risk assessments. These risks are presented to the Ethics, Environment and Sustainable Development Committee of ENGIE's Board of Directors.</p> <p>Human rights are incorporated in the analysis of the major capital investment projects, presented in Commitments Committee.</p>	<p>2018 Integrated Report - "An ambitious commitment to ethics and compliance" (p.31)  <a href="https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rapport%20integrate&amp;p=32&amp;lc=0">https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rapport%20integrate&amp;p=32&amp;lc=0</a></p> <p>2018 Integrated Report - "The Board of Directors, supporting ENGIE's strategy" (p.28)  <a href="https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rapport%20integrate&amp;p=30&amp;lc=0">https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rapport%20integrate&amp;p=30&amp;lc=0</a></p> <p>2017 Registration document - "4.4.3. Risk assessment" (p.130)  <a href="https://horizonlibrary.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45#v=Version1&amp;l=en&amp;p=132&amp;lc=0">https://horizonlibrary.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45#v=Version1&amp;l=en&amp;p=132&amp;lc=0</a></p> <p>engie.com internet website  <a href="http://www.engie.com/en/group/ethics-compliance/ethics-risks-analysis/">http://www.engie.com/en/group/ethics-compliance/ethics-risks-analysis/</a></p>
<p>At the operational level, annual human rights risks assessments are conducted by entities and reported through the global risk-management (ERM) system.</p> <p>New projects of the entities are also evaluated according to human rights criteria. An in-depth analysis is required for "at risk" countries.</p> <p>Methodological tools customized to the Group's activities accompany the Human Rights referential and policy.</p> <p>In the form of checklists, they aim to support managers for the risks analysis required. These tools are deployed since 2014.</p>	<p>2018 Integrated Report - "An ambitious commitment to ethics and compliance" (p.31)  <a href="https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rapport%20integrate&amp;p=32&amp;lc=0">https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rapport%20integrate&amp;p=32&amp;lc=0</a></p> <p>2017 Registration Document - "4.4.4. Reference texts" (p.131)  <a href="https://horizonlibrary.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45#v=Version1&amp;l=en&amp;p=132&amp;lc=0">https://horizonlibrary.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45#v=Version1&amp;l=en&amp;p=132&amp;lc=0</a></p> <p>engie.com internet website  <a href="http://www.engie.com/en/group/ethics-compliance/ethics-risks-analysis/">http://www.engie.com/en/group/ethics-compliance/ethics-risks-analysis/</a></p>
<p>The Human Rights Referential provides explicitly the integration in contracts of the requirement for suppliers, service providers, subcontractors and partners to respect the Group Human Rights commitments.</p> <p>The clause through which the Group asks all its business relationships (suppliers, contractors and partners) to respect its own commitments to, amongst others, respect human rights, was updated early 2018 to include special "duty of vigilance" provisions applicable to the Group's affected suppliers and subcontractors in accordance with the French law on the duty of vigilance requirements.</p>	<p>engie.com internet website  <a href="http://www.engie.com/en/commitments/procurement/procurement-policy/ethics-social-responsibility/">http://www.engie.com/en/commitments/procurement/procurement-policy/ethics-social-responsibility/</a></p> <p>engie.com internet website  <a href="https://www.engie.com/wp-content/uploads/2018/06/engie_csr_clause_april-2018.pdf">https://www.engie.com/wp-content/uploads/2018/06/engie_csr_clause_april-2018.pdf</a></p> <p>2018 Integrated Report - "Strengthening confidence in the company" (p.40)</p>



<p>This commitment completes existing actions of a responsible purchasing policy, in particular the <u>Code of conduct in supplier relations</u>: integration of ethical criteria in procurement processes, ethics, environmental and societal responsibility clause in the general conditions of purchase, “Ethics and supplier relations” training (implemented since December 2016, instead of the former “Ethics and purchasing” training, constructed in cooperation between the Ethics, Compliance &amp; Privacy Department and the Strategic Sourcing &amp; Supply Department (formerly named: Procurement Department and proposed since 2014).</p>	<p><a href="https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rapport%20intgré&amp;p=42&amp;lc=0">https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rapport%20intgré&amp;p=42&amp;lc=0</a></p>
<p>Training on human rights is available for all employees, either internally (new e-learning on human rights since October 2016), or through the association EDH (“Companies for Human Rights”: one-day classroom training).</p>	<p>2017 Registration Document -‘4.4.6. Training and awareness’ (p.131)  <a href="https://horizonlibrary.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45#v=Version1&amp;l=en&amp;p=132&amp;lc=0">https://horizonlibrary.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45#v=Version1&amp;l=en&amp;p=132&amp;lc=0</a></p>
<p>The Human Rights referential and policy are fully integrated into the Group Ethics approach, overseen at the highest corporate level by the Ethics, Environment and Sustainable Development Committee of ENGIE’s Board of Directors.          Within the General Secretariat, the Ethics, Compliance &amp; Privacy Department coordinates the implementation, with the support of a global network of more than 300 persons.          Managers and ethics and compliance officers must ensure that the conditions for its implementation in their entities are met.</p>	<p>2017 Registration Document -“4.4.2. Organization and structure” (p.130)  <a href="https://horizonlibrary.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45#v=Version1&amp;l=en&amp;p=132&amp;lc=0">https://horizonlibrary.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45#v=Version1&amp;l=en&amp;p=132&amp;lc=0</a>          engie.com internet website  <a href="http://www.engie.com/en/group/ethics-compliance/main-parties-involved-in-ethics/">http://www.engie.com/en/group/ethics-compliance/main-parties-involved-in-ethics/</a></p>



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

<p>The monitoring of the Human Rights referential and policy is included in the ethics &amp; compliance processes of the Group : internal control system, audits, etc.</p> <p>Specific checkpoints relating to the deployment and implementation of the Human Rights referential and policy are integrated in the Group's internal control system since 2014.</p>	<p>2017 Registration Document -"4.4.7. Control system" (p.132)  <a href="https://horizonlibrary.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45#v=Version1&amp;l=en&amp;p=134&amp;lc=0">https://horizonlibrary.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45#v=Version1&amp;l=en&amp;p=134&amp;lc=0</a></p> <p>engie.com internet website  <a href="http://www.engie.com/en/group/ethics-compliance/control-system-ethics/">http://www.engie.com/en/group/ethics-compliance/control-system-ethics/</a></p>
<p>The Human Rights referential and policy fall within the scope of the annual compliance procedure: the ethics and compliance officers prepare a report on the progress in ethical organization made by their respective entities, submitting this, together with a compliance letter from the entity's manager, to the Group CEO via the BU ethics and compliance officers. Based on these reports, the ENGIE annual compliance report is prepared and presented to the Ethics, Environment and Sustainable Development Committee of ENGIE's Board of Directors.</p> <p>Since 2015 indicators on the implementation of this referential and policy have been integrated in the annual compliance report</p>	<p>engie.com internet website  <a href="http://www.engie.com/en/group/ethics-compliance/ethical-compliance-referential/">http://www.engie.com/en/group/ethics-compliance/ethical-compliance-referential/</a></p>
<p>The internal ethics incidents reporting procedure includes explicitly human rights incidents.</p>	<p>2017 Registration Document -"4.4.5. Whistleblowing and reporting of ethics incidents" (p.131)  <a href="https://horizonlibrary.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45#v=Version1&amp;l=en&amp;p=132&amp;lc=0">https://horizonlibrary.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45#v=Version1&amp;l=en&amp;p=132&amp;lc=0</a></p> <p><a href="http://www.engie.com/en/group/ethics-compliance/ethical-compliance-referential/">http://www.engie.com/en/group/ethics-compliance/ethical-compliance-referential/</a></p>
<p>ENGIE maintains constant and proactive dialogue with its stakeholders, through dedicated operational mechanisms for dialogue and consultation and by its participation to voluntary initiatives.</p>	<p>2018 Integrated Report -"A global growth for ENGIE and its stakeholders" (p.35)  <a href="https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rapport%20integre&amp;p=36&amp;lc=0">https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rapport%20integre&amp;p=36&amp;lc=0</a></p>
<p>Operational grievance mechanisms are implemented and are available for anyone who feels affected by the activities of the Group.</p> <p>At the Group level, stakeholders have access to the ethics mail or the Mediator of the Group. In 2017 the Group set a new policy on whistle-blowers that incorporates the French legal requirements of the Sapin 2 law and the duty of vigilance law.</p>	<p>2017 Registration Document -"4.4.5. Whistleblowing and reporting of ethics incidents" (p.131)  <a href="https://horizonlibrary.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45#v=Version1&amp;l=en&amp;p=132&amp;lc=0">https://horizonlibrary.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45#v=Version1&amp;l=en&amp;p=132&amp;lc=0</a></p> <p>2018 Integrated Report -"An ambitious commitment to ethics and compliance" (p.31)  <a href="https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rapport%20integre&amp;p=32&amp;lc=0">https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rapport%20integre&amp;p=32&amp;lc=0</a></p>



## Implementing the ten principles into strategies and operations : Reliable policies and procedures concerning labour standards

### Labour :

- Principle 3 : Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining
- Principle 4 : Businesses should uphold the elimination of all forms of forced and compulsory labour
- Principle 5 : Businesses should uphold the effective abolition of child labour
- Principle 6 : Businesses should uphold the elimination of discrimination in respect of employment and occupation

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

<p>The Group's health and safety policy is drawn up with input from managers and employees and is based on a Group agreement with the trade union federations. It aims to safeguard the integrity of people (be they employees, service providers or third parties) and goods and promote quality of life at work. It is supplemented by the Group Rules on Health and Safety, which set down requirements applying to all entities. The action plan "zero fatalities" launched in 2012 was continued and intensified in 2017</p>	<p>Cf. 2018 Integrated Report page 38: <a href="https://library.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;p=40&amp;lc=0">https://library.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;p=40&amp;lc=0</a> Cf. ENGIE.com: <a href="https://www.engie.com/en/commitments/health-and-safety-policy/">https://www.engie.com/en/commitments/health-and-safety-policy/</a></p>
<p>The Group has set a new goal for 2020 an internal occupational accident frequency rate of lower or equal to 3 A managerial system comprising a 2016-2020 action plan, training courses, internal controls and audits, certifications, benchmarks and feedback, ENGIE has succeeded in reducing the frequency of occupational accidents involving its employees (down 60% since 2008 and down 8% compared with 2016).Thereby the frequency rate is of 3.3% in 2017.</p>	<p>Cf. 2018 Integrated Report pages 7, 39 : <a href="https://library.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;p=8&amp;lc=0">https://library.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;p=8&amp;lc=0</a>  <a href="https://library.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;p=40&amp;lc=0">https://library.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;p=40&amp;lc=0</a>  Cf. 2017 Registration Document 3.4.6.2 «Targets and implemented progress actions» page 67: <a href="https://library.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45/#v=Version1&amp;l=en&amp;p=70&amp;lc=0h">https://library.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45/#v=Version1&amp;l=en&amp;p=70&amp;lc=0h</a></p>
<p>In May 2014, the Group signed a global health and safety agreement that extends and strengthens the commitments it made at European level in 2010. The agreement expressly provides for close partnerships to be formed with suppliers and subcontractors so that they will guarantee the same level of health and safety as that afforded to Group employees. In 2016 a seminar gathered HR-Health and Safety network and workforce representatives to share practices for auditing and</p>	<p>Cf. 2017 Registration Document 3.4.6.3 « Dialogue with social partners » page 68: <a href="https://library.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45/#v=Version1&amp;l=en&amp;p=70&amp;lc=0">https://library.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45/#v=Version1&amp;l=en&amp;p=70&amp;lc=0</a></p>



<p>improving the quality of life in the workplace and to study together the working axes.</p> <p>Monitoring committees for the various collective agreements signed at Group level met in 2017 to review the implementation of these commitments</p>	
<p>Since 2011, the diversity objectives have recorded strong gains, the Group decided to continue its efforts in diversity and has set a 2020 target: 25% of women in the Group's workforce.</p> <p>At the end of 2017, women represent 22.2% of the workforce.</p>	<p>Cf .2018 Integrated Report pages 7, 39:  <a href="https://library.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;p=8&amp;lc=0">https://library.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;p=8&amp;lc=0</a></p> <p><a href="https://library.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;p=40&amp;lc=0">https://library.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;p=40&amp;lc=0</a></p> <p>Cf. 2017 Registration Document : page 64 : 3.4.3:"Social commitment : Building a company committed to corporate citizenship, diversity and solidarity":  <a href="https://library.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45/#v=Version1&amp;l=en&amp;p=66&amp;lc=0">https://library.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45/#v=Version1&amp;l=en&amp;p=66&amp;lc=0</a></p>
<p>Engie works to promote diversity of business by raising awareness: "I learn Energy", "My camera from the Pros", "Girls and Boys day day" .and entered into two new partnerships with a firm Limousin architect and University of Limoges.</p> <p>ENGIE is also tapping in the SME ecosystem to help increase the number of women in so-called "male professions" and the number of men in so-called "female professions".</p> <p>ENGIE obtained in 2017 the renewal of the diversity label for a four-year period for all Group production and services activities in France.</p>	<p>Cf. 2018 Integrated Report page 38 : « Diversity / gender equality »:  <a href="https://library.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;p=40&amp;lc=0">https://library.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;p=40&amp;lc=0</a></p> <p>Cf. ENGIE.com: ctrl + click to the link to ENGIE.com</p> <p>Cf. 2017 Registration Document : 3.4.3 "Social commitment : Building a company committed to corporate citizenship, diversity and solidarity" page 64:  <a href="https://library.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45/#v=Version1&amp;l=en&amp;p=66&amp;lc=0">https://library.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45/#v=Version1&amp;l=en&amp;p=66&amp;lc=0</a></p>
<p>As part of its actions to fight against discrimination on the grounds of sexual orientation, ENGIE signed on December 6, 2017 the LGBT commitment charter of the Autre Cercle.</p>	<p>Cf. 2017 Registration Document : 3.4.3 "Social commitment : Building a company committed to corporate citizenship, diversity and solidarity" page 66:  <a href="https://library.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45/#v=Version1&amp;l=en&amp;p=68&amp;lc=0">https://library.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45/#v=Version1&amp;l=en&amp;p=68&amp;lc=0</a></p>
<p>The Group signed a generation contract agreement with two representative trade union organizations in September 2013. By signing the document, the Group pledged to meet the following targets by the end of 2015:</p> <ul style="list-style-type: none"> <li>- hire 8,000 people aged under 35 on permanent contracts in France, of whom 3,000 to be under 25.</li> <li>- ensure that people on work-linked training contracts make up 5% of the workforce, and hire 50% of these trainees;.</li> <li>- keep older employees in work, ensuring they make up 13% of the workforce.</li> </ul>	<p>2015 Registration Document 3.2.5 « Social Relations » (P.74)  <a href="http://library.engie.com/uid_75ee14f2-7c97-41be-82ed-8578be0e7487/beevirtua/beevirtua.html#app=3d20&amp;9557-source=xmlConfs/init.xml&amp;adf3-lang=en&amp;ccb3-pagelId=76">http://library.engie.com/uid_75ee14f2-7c97-41be-82ed-8578be0e7487/beevirtua/beevirtua.html#app=3d20&amp;9557-source=xmlConfs/init.xml&amp;adf3-lang=en&amp;ccb3-pagelId=76</a></p> <p>2017 Integrated Report page 25-26 :  <a href="http://library.engie.com/uid_9b091935-66a4-48c6-9bdc-54982f2600b0/beevirtua/beevirtua.html#app=3d20&amp;ccb3-pagelId=26&amp;adf3-lang=en&amp;9557-source=xmlConfs/init.xml">http://library.engie.com/uid_9b091935-66a4-48c6-9bdc-54982f2600b0/beevirtua/beevirtua.html#app=3d20&amp;ccb3-pagelId=26&amp;adf3-lang=en&amp;9557-source=xmlConfs/init.xml</a></p>



<p>By the end of 2015, the following results had been achieved:</p> <ul style="list-style-type: none"> <li>- 7 770 people aged under 35 had been hired on permanent contracts in France</li> <li>- people on work-linked training contracts made up 4,8 % of the workforce (target: 5%)</li> <li>- 557 people aged over 50 had been hired on permanent contracts, meaning the 50+ age group accounted for 7,1% of all new hires on permanent contracts (target: 6%).</li> </ul> <p>Following the 2013 agreement on the generation contract, ENGIE renews its commitment through a three-year unilateral action plan for ENGIE SA and its subsidiaries covering the period 2016-2018. This action plan has three objectives:</p> <ul style="list-style-type: none"> <li>- Facilitating the integration of young people into employment through their access to an open-ended contract</li> <li>- Encourage the hiring and retention of older employees</li> <li>- Ensure the transmission of knowledge and skills</li> </ul> <p>This action plan is in line with the Group's agreement signed in September 2013. It covers all French companies included in the scope of consolidation by full consolidation of the Group or the majority of the share capital of which is held directly or Indirectly by ENGIE SA, subject to the dominant influence test.</p>	
<p>ENGIE has set up a scheme for forward-looking management of jobs and competencies, which is geared towards adjusting recruitment and helping employees to adapt to the company's future needs. It has set up the "ENGIE Skills" program which develops synergies between the Group's initiatives: the HR aspect of the medium-term action plan, the professional observatory, and the careers of tomorrow. In 2017, five priority actions were launched:</p> <ul style="list-style-type: none"> <li>- Accelerate the shift towards future-oriented activities</li> <li>- Organize the internal transfer of skills</li> <li>- Create a technical network</li> <li>- Organize the management of external skills</li> <li>- Fostering an entrepreneurial spirit among employees</li> </ul> <p>- In 2017, 67.7% of the Group's workforce took a training course, thus respecting the target (2/3 of all employees to take a course). More than 6,100 transfers took place and the Group hired over 23,800 new employees worldwide.</p>	<p>Cf. 2018 Integrated Report page 38 : « Training / Motivation » : <a href="https://library.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;p=40&amp;lc=0">https://library.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;p=40&amp;lc=0</a></p> <p>Cf. 2017 Registration Document 3.4.1.1 «Forward planning of jobs and skills to prepare for the future» (p 63) : <a href="https://library.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45/#v=Version1&amp;l=en&amp;p=64&amp;lc=0">https://library.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45/#v=Version1&amp;l=en&amp;p=64&amp;lc=0</a></p>



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

<p>The Group has defined a set of human resources development policies designed to attract, retain and develop all of the Group's employees, who constitute a key strategic asset. In 2017, ENGIE rolled out a new HR system to adapt skills to the Group's current and future challenges, with the aim of accelerating the shift towards growth-oriented activities and organizing the internal transfer of skills, promoting mobility and giving employees the opportunity to develop within the Group, and creating a network conducive to transferring and sharing skills.</p> <p>This system revolves around ENGIE skills and ENGIE Mobility.</p>	<p>Cf. 2017 Registration Document -3.4.1 «Human resources development and mobility policy» (p.63)  <a href="https://library.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45/#v=Version1&amp;l=en&amp;p=64&amp;lc=0">https://library.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45/#v=Version1&amp;l=en&amp;p=64&amp;lc=0</a></p>
<p>Social dialogue is held at three levels within the Group – global, European and French (almost 50% of the workforce being based in France) – and in each of the subsidiaries through representative and negotiating bodies. The social dialogue system is based on regular meetings with representatives of international trade union federations, a European Works Council and a Group Committee for France.</p>	<p>Cf. 2017 Registration Document - 3.4.5 « Social relations» (p.67)  <a href="https://library.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45/#v=Version1&amp;l=en&amp;p=68&amp;lc=0">https://library.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45/#v=Version1&amp;l=en&amp;p=68&amp;lc=0</a></p>
<p>Engie signed a European agreement in April 2016 to support the implementation of its enterprise project.</p> <p>This agreement has two priorities: strengthening professional excellence and develop the employability of its employees.</p> <p>It provides a budget of € 100M per year over 3 years dedicated to training and to achieve the goal of training each year 2/3 of employees from each company. Furthermore, it will strengthen the mobility (functional and geographical).</p>	<p><a href="https://www.engie.com/wp-content/uploads/2016/04/engie-accord-social-europeen.pdf">https://www.engie.com/wp-content/uploads/2016/04/engie-accord-social-europeen.pdf</a>          2017 Integrated Report p 25:  <a href="http://library.engie.com/uid_9b091935-66a4-48c6-9bdc-54982f2600b0/beevirtua/beevirtua.html#app=3d20&amp;ccb3-pageld=26&amp;adf3-lang=en&amp;9557-source=xmlConfs/init.xml">http://library.engie.com/uid_9b091935-66a4-48c6-9bdc-54982f2600b0/beevirtua/beevirtua.html#app=3d20&amp;ccb3-pageld=26&amp;adf3-lang=en&amp;9557-source=xmlConfs/init.xml</a></p>
<p>ENGIE signed in November 2017 a new European agreement on professional gender equality. This agreement for an indefinite term reaffirms that the promotion of equal opportunity, equal treatment and diversity of employees is an absolute priority for the Group.</p>	<p>Cf ENGIE.com:  <a href="https://www.engie.com/en/analysts/governance/social-dialogue/">https://www.engie.com/en/analysts/governance/social-dialogue/</a></p> <p>Cf. 2017 Registration Document : 3.4.5.2: "Group collective bargaining agreement" p67:  <a href="https://library.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45/#v=Version1&amp;l=en&amp;p=68&amp;lc=0">https://library.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45/#v=Version1&amp;l=en&amp;p=68&amp;lc=0</a></p>
<p>A new "Leadership Model," in line with the Group's strategy and its transformation, was rolled out to managers. The Leadership Model identifies 3 core areas of managerial responsibility and 6 core competencies. To support its deployment, the Co-Leaders training was launched in 2017 and attended by 10500 managers 1000 pairs of mentoring were set up between 2014 and 2015 as well as a digital platform for linking new pairs. In 2016, more than 200 mentoring pairs were set up.</p>	<p>Cf.2017 Registration Document :3.4.1.4"Targeted development policies" page 64:  <a href="https://library.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45/#v=Version1&amp;l=en&amp;p=66&amp;lc=0">https://library.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45/#v=Version1&amp;l=en&amp;p=66&amp;lc=0</a></p>
<p>ENGIE is investing heavily in training its employees in health and safety and raising their awareness of the issue. In 2017, more than 1300 managers took the 'Leadership in Health and Safety' course.</p>	<p>2017 Registration Document 3.4.6.2 "Targets and implemented progress actions" page 68:</p>



<p>In 2017, the members of the Group COMEX continued to realize security managerial visits</p>	<p><a href="https://library.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45/#v=Version1&amp;l=en&amp;p=70&amp;lc=0">https://library.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45/#v=Version1&amp;l=en&amp;p=70&amp;lc=0</a></p>
<p>A managerial programme comprising an action plan for 2010-2015, training programmes, internal audits and inspections, external certification, benchmarking and feedback, reinforced in 2017 by "Safety Inspections" has enabled ENGIE to drive down the accident frequency rate among its employees (down -60% from 2008). The objectives for the period 2016- 2020 relate in particular to the reduction in work accident and reducing absenteeism for medical reasons.</p>	<p>Cf. 2018 Integrated Report « Health / safety / security» page 38:  <a href="https://library.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;p=40&amp;lc=0">https://library.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;p=40&amp;lc=0</a></p> <p>Cf. 2017 Registration Document : 3.4.6 « Health and safety policy » page 67:  <a href="https://library.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45/#v=Version1&amp;l=en&amp;p=68&amp;lc=0">https://library.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45/#v=Version1&amp;l=en&amp;p=68&amp;lc=0</a></p>
<p>In 2017, the WIN (Women in Networking) network has over 2,000 members among the Group's female staff. It offers members regular exchanges and group discussions on professional challenges and ENGIE's strategy and has members in twenty countries. The network has recently been launched in China, Singapore and the Netherlands.</p>	<p>Cf. 2018 Integrated Report p 38:  <a href="https://library.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;p=40&amp;lc=0">https://library.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;p=40&amp;lc=0</a></p> <p>Cf. ENGIE.com:  <a href="https://www.engie.com/en/analysts/esr-policy/diversity-policy/">https://www.engie.com/en/analysts/esr-policy/diversity-policy/</a></p>
<p>Each of ENGIE's entities in France implements the Group's disability policy, whilst taking account of specific operational and local characteristics. At present, 11 collective agreements approved by the Regional Directorates for Businesses, Competition, Consumption, Labour and Employment cover some 95% of the Group's employees in France.</p> <p>At the end of 2017, the Group's employment rate in France was 4.61%. In October 2016, the Group signed the Global Business and Disability Charter of the ILO (International Labor Organization)</p>	<p>Cf. 2017 Registration Document - 3.4.2.3 «Social commitment : building a company committed to corporate citizenship, diversity and solidarity» (p.65):  <a href="#">Copy / paste the link to 2017 Registration Document</a></p>
<p>ENGIE is actively involved in a number of projects that use sport as a driver and vector for social and professional inclusion.</p>	<p>Cf. 2017 Registration Document -3.4.3 «Social commitment : building a company committed to corporate citizenship, diversity and solidarity» (p.65)  <a href="https://library.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45/#v=Version1&amp;l=en&amp;p=66&amp;lc=0">https://library.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45/#v=Version1&amp;l=en&amp;p=66&amp;lc=0</a></p>



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

<p>Implementation of the Group's health and safety principles and requirements is monitored by means of internal inspections and audits, which are conducted by the Group Health and Safety Division.</p> <p>Health and safety management reviews are carried out at all levels. These take stock of the current situation and set out pathways for enhancing the management system's efficiency.</p>	<p>Cf. 2018 Integrated Report « Health / safety / Security » page 38  <a href="https://library.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;p=40&amp;lc=0">https://library.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;p=40&amp;lc=0</a></p> <p>Cf. 2017 Registration Document:3.4.6 « health and safety policy » (p.67):  <a href="https://library.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45/#v=Version1&amp;l=en&amp;p=68&amp;lc=0">https://library.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45/#v=Version1&amp;l=en&amp;p=68&amp;lc=0</a></p>
<p>ENGIE monitors its social responsibility efforts using a mechanism based on a number of quantified indicators, which are mentioned in its social reports, among other places. These help the Group to continuously improve its performance.</p>	<p>Cf. ENGIE.com :  <a href="https://www.engie.com/wp-content/uploads/2018/06/engie_document-de-reference-2017_en_pour-site-rse-note-de-methodologie-du-reporting-social.pdf">https://www.engie.com/wp-content/uploads/2018/06/engie_document-de-reference-2017_en_pour-site-rse-note-de-methodologie-du-reporting-social.pdf</a></p> <p><a href="https://www.engie.com/wp-content/uploads/2018/06/engie_document-de-reference-2017_en_pour-site-rse-reporting-social-.pdf">https://www.engie.com/wp-content/uploads/2018/06/engie_document-de-reference-2017_en_pour-site-rse-reporting-social-.pdf</a></p>
<p>ENGIE has adopted a social reporting method that has been checked against the AA1000 standards by its statutory auditors.</p>	<p>Cf. ENGIE.com:  <a href="https://www.engie.com/wp-content/uploads/2018/06/engie_document-de-reference-2017_en_pour-site-rse-attestation-des-cac1.pdf">https://www.engie.com/wp-content/uploads/2018/06/engie_document-de-reference-2017_en_pour-site-rse-attestation-des-cac1.pdf</a></p>
<p>The Group has renewed for a four-year period the diversity label (awarded by French standardization agency AFNOR). This award recognized and highlighted ENGIE's commitments and actions to prevent discrimination, promote equal opportunities and foster diversity.</p>	<p>Cf. 2017 Registration Document 3.4.3 «Social commitment : building a company committed to corporate citizenship, diversity and solidarity» (p.64):  <a href="https://library.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45/#v=Version1&amp;l=en&amp;p=66&amp;lc=0">https://library.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45/#v=Version1&amp;l=en&amp;p=66&amp;lc=0</a></p> <p>Cf. 2018 Integrated Report p 18:  <a href="https://library.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;p=20&amp;lc=0">https://library.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;p=20&amp;lc=0</a></p>

## Implementing the ten principles into strategies and operations : Reliable policies and procedures concerning environment protection

### Environment :

- Principle 7 : Businesses should support a precautionary approach to environmental challenges
- Principle 8 : Businesses should undertake initiatives to promote greater environmental responsibility
- Principle 9 : Businesses should encourage the development and diffusion of environmentally friendly technologies

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

<p>When developing its operational activities, ENGIE refers to and complies with the main international standards and agreements on protecting biodiversity, including:</p> <ul style="list-style-type: none"> <li>• the Convention on Biological Diversity</li> <li>• the Millennium Development Goals</li> <li>• the United Nations Framework Convention on Climate Change.</li> </ul>	
<p>The Group has set new environmental targets for 2020 which:</p> <ul style="list-style-type: none"> <li>• Share of renewable energy in the production capacity mix in 2020 : 25%</li> <li>• -20% CO2 emission reduction rate for power generation compared with 2012</li> </ul> <p>The results in 2016 are the following:</p> <ul style="list-style-type: none"> <li>• Share of renewable energy in the production capacity mix: 19,5%</li> <li>• CO2 emission reduction rate for power generation compared with 2012 : -11,3%</li> </ul>	<p><a href="http://www.engie.com/en/journalists/press-releases/2016-integrated-report/">http://www.engie.com/en/journalists/press-releases/2016-integrated-report/</a></p> <p>Cf. 2018 Integrated Report pages 7, 15, 44-47: <a href="https://library.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;p=8&amp;lc=0">https://library.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;p=8&amp;lc=0</a> <a href="https://library.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;p=16&amp;lc=0">https://library.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;p=16&amp;lc=0</a> <a href="https://library.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;p=46&amp;lc=0">https://library.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;p=46&amp;lc=0</a></p> <p>Cf. 2017 Registration Document p14: <a href="https://library.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45/#v=Version1&amp;l=en&amp;p=16&amp;lc=0">https://library.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45/#v=Version1&amp;l=en&amp;p=16&amp;lc=0</a></p>
<p>In February 2018, ENGIE has updated its environmental policy.</p>	<p>Cf. ENGIE.com: <a href="https://www.engie.com/wp-content/uploads/2018/06/engie_poienv_pap_bat_en_bd.pdf">https://www.engie.com/wp-content/uploads/2018/06/engie_poienv_pap_bat_en_bd.pdf</a></p>
<p>. In addition to its environmental policy, in terms of preservation of biodiversity, ENGIE has renewed its commitment to the SNB for the 2016-2018 period, with the ambition of:</p> <ul style="list-style-type: none"> <li>• identify and publicize internally all the benefits and opportunities related to actions in favor of biodiversity;</li> <li>• set up on the Group's sites voluntary and concerted approaches with stakeholders;</li> </ul>	<p>Cf. ENGIE's Act4nature commitment: <a href="#">Ctrl + click for the link Act4nature</a></p>



<ul style="list-style-type: none"> <li>• to anchor biodiversity as an integral dimension of the Group's performance.</li> </ul> <p>As part of the Act4nature initiative, on July 10, 2018, ENGIE joined forces with around 60 companies to protect biodiversity by adhering to the 10 common commitments and adding specific commitments to the Group.</p>	
<p>ENGIE has drawn up a water management policy that is in step with the core elements identified by the CEO Water Mandate, an initiative that the Group has endorsed since its launch. Every year, ENGIE submits a progress report to the CEO Water Mandate.</p>	<p>Cf. ENGIE.com:  <a href="#">ctrl + click for the link to ENGIE.com : Water rules and commitments</a>  <a href="#">Ctrl + click for the link to ENGIE.com: CEO Water Mandate COP2017</a></p>
<p>ENGIE has signed the Energy Efficiency Charter for Public and Private Commercial Buildings. ENGIE's action sheet is action sheet no. 19 in the document below (available in French only):</p>	<p><a href="http://www.planbatimentdurable.fr/charte-pour- l-efficacite-energetique-des-batiments- a894.html">http://www.planbatimentdurable.fr/charte-pour- l-efficacite-energetique-des-batiments- a894.html</a>  <a href="http://www.planbatimentdurable.fr/IMG/pdf/Rapport_2_CSTB_DH_UP_PBD_charte_tertiaire_VF.pdf">http://www.planbatimentdurable.fr/IMG/pdf/Rapport_2_CSTB_DH_UP_PBD_charte_tertiaire_VF.pdf</a></p>
<p>ENGIE places air pollution issues at the very heart of its strategies. The Group has taken a wide range of actions to cut emissions of pollutants such as SO<sub>2</sub>, NO<sub>x</sub> and particulate matter.</p>	<p>Cf.2018 Integrated Report pages 44-45:  <a href="https://library.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;p=46&amp;lc=0">https://library.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;p=46&amp;lc=0</a></p> <p>Cf 2017 Registration Document 3.5.4.7 "Atmospheric pollutants" p 94:  <a href="https://library.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45/#v=Version1&amp;l=en&amp;p=96&amp;lc=0">https://library.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45/#v=Version1&amp;l=en&amp;p=96&amp;lc=0</a></p>
<p>The Group's procurement policy sets down the following principles for sourcing:</p> <ul style="list-style-type: none"> <li>• All calls for tender must follow a set structure and must be issued by purchasers based on an optimized statement of need to keep the overall acquisition cost as low as possible (including operating, maintenance and end-of-life costs); the relevant need must be stated in line with functional specifications as far as possible and should specify all applicable requirements, in particular in terms of technical aspects, performance, health, safety, social responsibility and environmental aspects.</li> <li>• All tenders received from suppliers must be analyzed by the purchasing advisor and the purchaser against a specific scale for assessing compliance with the various requirements set out at the statement-of-need stage; all eligible tenders must then be clarified; needs may need to be developed further; if the statement of need is amended, all the companies consulted must be invited to submit a fresh tender based on the amendments made.</li> </ul>	<p>Cf 2017 Registration Document 3.7 "Purchasing and suppliers" p 99:  <a href="https://library.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45/#v=Version1&amp;l=en&amp;p=100&amp;lc=0">https://library.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45/#v=Version1&amp;l=en&amp;p=100&amp;lc=0</a></p> <p>Cf. ENGIE.com:  <a href="https://www.engie.com/en/analysts/responsible-consumption/sustainable-purchasing/">https://www.engie.com/en/analysts/responsible-consumption/sustainable-purchasing/</a></p>



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

<p>To monitor the implementation of its environmental policy, manage environmental risks and enhance communication on environmental performance to stakeholders, the Group has developed a reporting system that goes above and beyond the requirements laid down by French law and draws on work carried out within dialogue bodies including the Global Reporting Initiative (GRI) and the World Business Council for Sustainable Development (WBCSD).</p>	<p>Cf. ENGIE.com  <a href="https://www.engie.com/wp-content/uploads/2018/06/engie_document-de-reference-2017_en_pour-site-rse-note-de-methodo-env-.pdf">https://www.engie.com/wp-content/uploads/2018/06/engie_document-de-reference-2017_en_pour-site-rse-note-de-methodo-env-.pdf</a>   <a href="https://www.engie.com/wp-content/uploads/2018/06/engie_document-de-reference-2017_en_pour-site-rse-report-env.pdf">https://www.engie.com/wp-content/uploads/2018/06/engie_document-de-reference-2017_en_pour-site-rse-report-env.pdf</a></p>
<p>Its environmental reporting has been checked against the AA1000 standards by its statutory auditors.</p>	<p><a href="https://www.engie.com/wp-content/uploads/2018/06/engie_document-de-reference-2017_en_pour-site-rse-attestation-des-cac1.pdf">https://www.engie.com/wp-content/uploads/2018/06/engie_document-de-reference-2017_en_pour-site-rse-attestation-des-cac1.pdf</a></p>
<p>Supported by its research centre, ENGIE has performed life cycle analyses for one kWh of generated electricity and the gas chain. Measurement of the water footprint is connected to these LCAs..</p>	<p><a href="http://www.engie.com/en/highlights/life-cycle-assessment/">http://www.engie.com/en/highlights/life-cycle-assessment/</a></p>
<p>The Environmental and Social Responsibility Executive Committee implements the CSR policy, ensures that Corporate and the Group's various Business Units share and build on their experiences, and manages exchanges on CSR strategies.</p> <p>The Committee meets on a monthly basis under the chairmanship of the Group CSR Director and is made up of:</p> <ul style="list-style-type: none"> <li>- the Business Unit Environmental and Societal Responsibility managers (one in each BU, member of the Management Committee of the Business Unit)</li> <li>- members of the CSR Division</li> </ul>	<p>Cf. ENGIE.com:  <a href="https://www.engie.com/en/analysts/governance/csr-department-governance/">https://www.engie.com/en/analysts/governance/csr-department-governance/</a></p>
<p>The Group has mapped the environmental and health risks it may encounter.</p> <p>The Group was the subject, in 2017, of 13 complaints and 1 sentence for harm to the environment or health, paying out no damage. While these figures may seem very low given the Group's size and the industrial nature of its activities, the Group actively monitors them and is taking action to reduce them further. Moreover, ENGIE has set aside: €19,2 million for addressing risks related to environmental disputes. In 2017, the Group's expenditure on the environment (investments and operating costs linked to environmental conservation) totaled €603 M€</p>	<p>2017 Registration Document page 95  <a href="https://library.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45/#v=Version1&amp;l=en&amp;p=96&amp;lc=0">https://library.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45/#v=Version1&amp;l=en&amp;p=96&amp;lc=0</a></p>



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

<p>ENGIE monitors its environmental responsibility efforts using a mechanism based on a number of quantified indicators, which are mentioned in its environmental reports, among other places. These help the Group to continuously improve its performance.</p>	<p>Cf. ENGIE.com :  <a href="https://www.engie.com/wp-content/uploads/2018/06/engie_document-de-reference-2017_en_pour-site-rse-report-env.pdf">https://www.engie.com/wp-content/uploads/2018/06/engie_document-de-reference-2017_en_pour-site-rse-report-env.pdf</a></p>
<p>ENGIE has adopted an environmental reporting method that has been checked against the AA1000 standards by its statutory auditors.</p>	<p>Cf. ENGIE.com:  <a href="https://www.engie.com/wp-content/uploads/2018/06/engie_document-de-reference-2017_en_pour-site-rse-note-de-methodo-env-.pdf">https://www.engie.com/wp-content/uploads/2018/06/engie_document-de-reference-2017_en_pour-site-rse-note-de-methodo-env-.pdf</a>   <a href="https://www.engie.com/wp-content/uploads/2018/06/engie_document-de-reference-2017_en_pour-site-rse-attestation-des-cac1.pdf">https://www.engie.com/wp-content/uploads/2018/06/engie_document-de-reference-2017_en_pour-site-rse-attestation-des-cac1.pdf</a></p>
<p>The Group's top management sponsors ENGIE's efforts to make the environment an integral part of its management approach. BU-trained auditors, supported by the relevant Corporate departments, conduct environmental audits to ensure that environmental legislation is respected in the field and assess major environmental risks. Each year, the Group's BU directors make fresh commitments to comply with legislation and guarantee the quality/reliability of environmental data.</p>	
<p>The Group submits an environmental report to the Management Committee and the Board of Directors' Ethics, Environment and Sustainable Development Committee every year.</p>	<p>Cf. 2018 Integrated Report page 28:  <a href="https://library.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;p=30&amp;lc=0">https://library.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;p=30&amp;lc=0</a></p>
<p>The Corporate Audit and Risk Division has a team devoted solely to environmental issues. This team carries out a number of thematic audits each year, examining issues such as waste management and water management</p>	
<p>ENGIE fills out the CDP's questionnaire every year. In 2016, the Group scored A+ for CDP Climate and A- for CDP Water.</p>	<p><a href="https://www.cdp.net/en-US/Pages/HomePage.aspx">https://www.cdp.net/en-US/Pages/HomePage.aspx</a></p>



## Implementing the ten principles into strategies and operations : Reliable policies and procedures concerning the fight against corruption

### Anti-corruption :

- Principle 10 : Businesses should work against corruption in all its forms, including extortion and bribery.

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

<p>ENGIE's ethical goal is to act, in all circumstances, in accordance with the Group's values and commitments and in compliance with laws and regulations.</p> <p>In terms of prevention of corruption, the ENGIE's ethics policy aims to develop an integrity culture and an ethics practice based on 4 principles, among which "Behave honestly and promote a culture of integrity". To support Group employees and entities in the strengthening of this culture of integrity, the ENGIE Ethics charter defines the 4 Group ethics principles, and the Integrity Referential specifies the Group organization to manage the risks of integrity breaches and sets out the action plan for the prevention of fraud and corruption.</p> <p>ENGIE has reiterated its commitment to ethics by signing, in 2011, the global agreement on fundamental rights, social dialogue and sustainable development which applies to all the Group's entities and reaffirms its culture of integrity, trust and honesty and the principle of zero tolerance towards fraud and corruption within the Group and in respect of external parties.</p> <p>The zero tolerance message was reiterated in 2016 by Isabelle KOCHER, CEO of ENGIE on several occasions (in April 2016 at the 2016 Group Ethics &amp; Compliance Convention and in December 2016 when the Ethics charter and <u>Practical guide to ethics</u> were updated):</p> <p>«We have a very clear policy : zero tolerance, particularly regarding fraud and corruption, and complete commitment to compliance with ethical rules – those of the countries in which we operate and those we set for ourselves.</p> <p>Although our Group draws strength from its operational excellence, it is also recognized by all of its partners and customers for its very high level of reliability and responsibility. It is therefore down to each and every one of us to live up to the trust that is placed on us, by making ethics an absolute priority every day.»</p> <p>Isabelle KOCHER, CEO, November 2016, introduction of ENGIE Ethics Charter</p>	<p>2018 Integrated Report - "An ambitious commitment to ethics and compliance" (p.31)  <a href="https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rapport%20intgré&amp;p=32&amp;lc=0">https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rapport%20intgré&amp;p=32&amp;lc=0</a></p> <p>2017 Registration Document -"4.4.1. Commitment at the highest Group level" (p.130)  <a href="https://horizonlibrary.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45#v=Version1&amp;l=en&amp;p=132&amp;lc=0">https://horizonlibrary.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45#v=Version1&amp;l=en&amp;p=132&amp;lc=0</a></p> <p>Reporting on the 10<sup>th</sup> principle against corruption  "1. Commitment and policy" B1-B2 + D1-D5</p> <p>engie.com internet website  <a href="http://www.engie.com/en/group/ethics-compliance/group-integrity-referential/">http://www.engie.com/en/group/ethics-compliance/group-integrity-referential/</a></p> <p>engie.com internet website  <a href="http://www.engie.com/en/group/ethics-compliance/main-parties-involved-in-ethics/">http://www.engie.com/en/group/ethics-compliance/main-parties-involved-in-ethics/</a></p> <p>ENGIE Ethics charter  <a href="http://library.engie.com/uid_bf06d0f9-89de-4f27-b8f6-b08f5bf9d4ce/">http://library.engie.com/uid_bf06d0f9-89de-4f27-b8f6-b08f5bf9d4ce/</a></p>
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<p>In the framework of its anti-corruption program, the Group has implemented specific policies relating to:</p> <ul style="list-style-type: none"> <li>- Business consultants</li> <li>- Gifts and hospitality</li> <li>- Lobbying (March 2017)</li> <li>- Patronage and sponsorships (completed in June 2018 through a dedicated due diligence policy which addresses the requirements of the French Sapin II law and the French law on the duty of vigilance)</li> </ul> <p>The implementation of due diligences on all partners in the investment projects and major contracts (updated in June 2018, in particular to adapt its content to the requirements of the French Sapin II law and the French law on the duty of vigilance)</p> <ul style="list-style-type: none"> <li>- The integration of an ethics, environmental and societal responsibility clause in contracts with suppliers, service providers, subcontractors and partners of the Group (this clause was updated early 2018 to include special “duty of vigilance” provisions applicable to the Group’s affected suppliers and subcontractors in accordance with the French law on the duty of vigilance requirements).</li> <li>- The prevention of conflicts of interests (November 2016)</li> </ul> <p>In 2016, ENGIE developed its own internal capacity to carry out ethics due diligence; in 2018, the internal due diligence department plays a central role in the Group’s due diligence procedures.</p> <p>With regard to interest representation, the Group has set up a reporting procedure so that all of the entities concerned can comply with their legal obligations, particularly with regard to the reporting obligation to France’s High Authority for Transparency in Public Life, pursuant to the French Sapin II law.</p>	<p>2018 Integrated Report - “An ambitious commitment to ethics and compliance” (p.31)  <a href="https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rapport%20intégré&amp;p=32&amp;lc=0">https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rapport%20intégré&amp;p=32&amp;lc=0</a></p> <p>2018 Integrated Report - “Strengthening confidence in the company” (p.40)  <a href="https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rapport%20intégré&amp;p=42&amp;lc=0">https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rapport%20intégré&amp;p=42&amp;lc=0</a></p> <p>2017 Registration Document -“4.4.4 Reference texts” (p.131)  <a href="https://horizonlibrary.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45#v=Version1&amp;l=en&amp;p=132&amp;lc=0">https://horizonlibrary.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45#v=Version1&amp;l=en&amp;p=132&amp;lc=0</a></p>
<p>The Group requires its suppliers to acquaint themselves with and support, its commitment regarding ethics and sustainable development as stipulated in the <a href="#">Ethics charter</a>, the <a href="#">Practical guide to Ethics</a>, the <a href="#">procurement policy</a>, the document “ethics business relationships: governing principles”, <a href="#">the code of conduct in supplier relations</a>, and issued on its website.</p>	<p>engie.com internet website  <a href="http://www.engie.com/en/commitments/procurement/">http://www.engie.com/en/commitments/procurement/</a></p>



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

<p>The Group has implemented a scheme to fight against corruption which comes as follows:</p>	<p>Reporting on the 10<sup>th</sup> principle against corruption "2. Implementation" B3-B6 + D6-D11</p> <p>engie.com internet website <a href="http://www.engie.com/en/group/ethics-compliance/group-integrity-referential/">http://www.engie.com/en/group/ethics-compliance/group-integrity-referential/</a></p>
<p><b>Risk assessment</b></p> <p>An assessment of ethical risks that takes into account the specific characteristics of the Group's activities is integrated into the annual ENGIE's risk analysis process (ERM).</p> <p>The results are presented to the Group Executive Committee and to the Ethics, Environment and Sustainable Development Committee of ENGIE Board of Directors.</p> <p>Review of country risk in terms of human rights and corruption related with the Group activities development is also conducted by the Ethics, Environment and Sustainable development Committee of ENGIE Board of Directors.</p> <p>Twelve environmental, social and societal criteria are presented, analyzed and assessed for each new investment project and major contracts of certain amounts. These criteria relate in particular to ethics, local purchases.</p>	<p>2017 Registration Document- "4.1.3. Risk assessment" (p.130) <a href="https://horizonlibrary.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45#v=Version1&amp;l=en&amp;p=132&amp;lc=0">https://horizonlibrary.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45#v=Version1&amp;l=en&amp;p=132&amp;lc=0</a></p> <p>engie.com internet website <a href="http://www.engie.com/en/group/ethics-compliance/ethics-risks-analysis/">http://www.engie.com/en/group/ethics-compliance/ethics-risks-analysis/</a></p> <p>2018 Integrated Report- "An ambitious commitment to ethics and compliance" (p.31) <a href="https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rapport%20integr&amp;p=32&amp;lc=0">https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rapport%20integr&amp;p=32&amp;lc=0</a></p>
<p>A <b>dedicated organization</b> supervised by the Ethics, Environment and Sustainable Development Committee, a specialized Board of Directors committee, has been established.</p> <p>Under the leadership of the Group General Secretary, who presides over the Compliance Committee, the Group Ethics, Compliance &amp; Privacy Department helps to integrate ethics into the Group's vision, strategy, management and practices. It proposes reference texts for ethics and compliance, supervises their implementation by the operational entities and the functional departments, leads training initiatives, receives reports on ethical incidents and contributes to the necessary control activities with the Group's other monitoring and control organizations. The Ethics &amp; Compliance network, which brings together over 300 ethics and compliance officers and ethics correspondents from the Group's entities who support their management in the implementation of ethical policies, is headed by the Ethics, Compliance &amp; Privacy Department.</p>	<p>2017 Registration Document "4.4.2. Organization and structure" (p.130) <a href="https://horizonlibrary.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45#v=Version1&amp;l=en&amp;p=132&amp;lc=0">https://horizonlibrary.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45#v=Version1&amp;l=en&amp;p=132&amp;lc=0</a></p> <p>2018 Integrated Report - " The Board of Directors, supporting ENGIE's strategy" (p.28) <a href="https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rapport%20integr&amp;p=30&amp;lc=0">https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rapport%20integr&amp;p=30&amp;lc=0</a></p> <p>2017 Registration Document- "Ethics, Environment and Sustainable Development Committee" (p.126) <a href="https://horizonlibrary.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45#v=Version1&amp;l=en&amp;p=128&amp;lc=0">https://horizonlibrary.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45#v=Version1&amp;l=en&amp;p=128&amp;lc=0</a></p>

<p>The Ethics, Environment and Sustainable Development Committee met 4 times in 2017 and handled the recurring themes and current topics related to ethics.</p>	
<p>The <b>Ethics charter</b>, which sets the general framework for the professional behavior of every employee:</p> <ul style="list-style-type: none"> <li>- The Group's <b>Ethics charter</b> and the <b>Practical guide to ethics</b>, updated in 2016; are available via the Group's internet website and published in 20 languages in the ENGIE virtual library. These reference documents forbid bribery and corruption.</li> <li>- The <b>Ethics charter</b> and the <b>Practical guide to ethics</b> were massively distributed to employees when updated in December 2016, and to all new employees who commit to respect the ethics principles.</li> </ul>	<p>2018 Integrated Report -"An ambitious commitment to ethics and compliance » (p.31)  <a href="https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rapport%20intgré&amp;p=30&amp;lc=0">https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rapport%20intgré&amp;p=30&amp;lc=0</a></p> <p>2017 Registration Document -"4.4.4. Reference texts" (p.132)  <a href="https://horizonlibrary.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45#v=Version1&amp;l=en&amp;p=134&amp;lc=0">https://horizonlibrary.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45#v=Version1&amp;l=en&amp;p=134&amp;lc=0</a></p> <p>engie.com internet website  <a href="http://www.engie.com/en/group/ethics-compliance/ethics-charter-and-practical-guide-to-ethics/">http://www.engie.com/en/group/ethics-compliance/ethics-charter-and-practical-guide-to-ethics/</a></p> <p>Ethics charter:  <a href="http://library.engie.com/uid_9b11cf19-69c1-41d3-872a-01a701baffa3/">http://library.engie.com/uid_9b11cf19-69c1-41d3-872a-01a701baffa3/</a></p> <p>Practical guide to ethics:  <a href="http://library.engie.com/uid_204082eb-b4f4-4070-a387-fe759559aaf2/">http://library.engie.com/uid_204082eb-b4f4-4070-a387-fe759559aaf2/</a></p>
<p>The handing over of the ethics reference documents to the newly hired employees along with ensuring that they are aware of the ethics principles and committed to following them (the HR note dated end of 2014 has been updated and turned into the Group policy on the incorporation of ethics in HR processes as of May 2017).</p>	<p>2018 Integrated Report -" An ambitious commitment to ethics and compliance" (p.31)  <a href="https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rapport%20intgré&amp;p=30&amp;lc=0">https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rapport%20intgré&amp;p=30&amp;lc=0</a></p>

<p>Ethics is included in the annual appraisal process for senior executives. At the end of 2014, the Group decided the widespread inclusion of ethics in all annual evaluations (the HR note dated end of 2014 has been updated and turned into the Group policy on the incorporation of ethics in HR processes as of May 2017).</p>	<p>2018 Integrated Report -“An ambitious commitment to ethics and compliance” (p.31)  <a href="https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rapport%20intgré&amp;p=30&amp;lc=0">https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rapport%20intgré&amp;p=30&amp;lc=0</a></p>
<p><b><u>Communication, manager training and employee awareness developed within the Group</u></b></p> <p>The specific training on the risk of fraud and corruption has been attended by 93% of the senior executives as at end of 2017. This training is also mandatory since 2016 for members of BU's general management committees and members of the ethics and compliance network, and strongly recommended for business developers.</p> <p>The training dedicated to the purchase line deployed in the Group since 2014 has been updated in 2016.</p> <p>Ethics and compliance training plans are prepared at Group and BUs/entities levels.</p> <p>A status of ethics training is presented each year to the Ethics, Environment and Sustainable Development Committee of ENGIE Board of Directors.</p>	<p>2017 Registration Document -“4.4.6. Training and awareness” (p.131)  <a href="https://horizonlibrary.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45#v=Version1&amp;l=en&amp;p=132&amp;lc=0">https://horizonlibrary.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45#v=Version1&amp;l=en&amp;p=132&amp;lc=0</a></p> <p>2018 Integrated Report -“An ambitious commitment to ethics and compliance” (p.31)  <a href="https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rapport%20intgré&amp;p=30&amp;lc=0">https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rapport%20intgré&amp;p=30&amp;lc=0</a></p> <p>2018 Integrated Report -“Strengthening confidence in the company” (p.40)  <a href="https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rapport%20intgré&amp;p=42&amp;lc=0">https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rapport%20intgré&amp;p=42&amp;lc=0</a></p> <p>engie.com internet website  <a href="http://www.engie.com/en/group/ethics-compliance/training/">http://www.engie.com/en/group/ethics-compliance/training/</a></p>
<p><b><u>Initiatives</u></b></p> <p>The Group is involved in several multilateral international anti-corruption initiatives, such as:</p> <ul style="list-style-type: none"> <li>- UN Convention against Corruption (UNCAC)</li> <li>- The OECD anti-corruption initiative</li> </ul> <p>The Group is a member of several think tanks specialized in ethics:</p> <ul style="list-style-type: none"> <li>- Institute for Business Ethics (I.B.E.)</li> <li>- Cercle Ethique des Affaires (CEA) en France</li> <li>- Transparency International France</li> </ul>	<p>2017 Registration Document -“4.4.1. Commitment at the highest Group level” (p.130)  <a href="https://horizonlibrary.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45#v=Version1&amp;l=en&amp;p=132&amp;lc=0">https://horizonlibrary.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45#v=Version1&amp;l=en&amp;p=132&amp;lc=0</a></p> <p>engie.com internet website  <a href="http://www.engie.com/en/group/ethics-compliance/references-and-memberships/">http://www.engie.com/en/group/ethics-compliance/references-and-memberships/</a></p>

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

<p>The ethics policy is covered by a compliance and control system run by the Group's Ethics, Compliance &amp; Privacy Department, which is accountable to the General Secretariat and works under the supervision of the Chief Executive Officer.</p>	<p>2018 Integrated Report -"An ambitious commitment to ethics and compliance" (p.31)  <a href="https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rappport%20intgré&amp;p=30&amp;lc=0">https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rappport%20intgré&amp;p=30&amp;lc=0</a></p> <p>2017 Registration Document -"4.4.7. Control system" (p.132)  <a href="https://horizonlibrary.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45#v=Version1&amp;l=en&amp;p=134&amp;lc=0">https://horizonlibrary.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45#v=Version1&amp;l=en&amp;p=134&amp;lc=0</a></p> <p>Reporting on the 10<sup>th</sup> principle against corruption  "3. Monitoring" B7 + D12-D15</p> <p>engie.com internet website  <a href="http://www.engie.com/en/group/ethics-compliance/control-system-ethics/">http://www.engie.com/en/group/ethics-compliance/control-system-ethics/</a></p>
<p><b>Ethics incidents:</b></p> <ul style="list-style-type: none"> <li>- A confidential whistle-blowing system is open to all Group employees and to all external third parts (customers, suppliers, etc.). In 2017 the Group set a new policy on whistle-blowers that incorporates the French legal requirements of the Sapin II law and the duty of vigilance law.</li> <li>- Managerial notification of ethics incidents is done via a dedicated IT tool (INFORM'ethics)</li> <li>- Ethics incidents are subject to systematic processing and implementation of corrective and preventive measures</li> </ul> <p>Yearly review of the ethics and compliance mechanisms and of the ethics incidents by the Ethics, Environment &amp; Sustainable Development Committee of ENGIE Board of Directors</p>	<p>2018 Integrated Report -"An ambitious commitment to ethics and compliance" (p.31)  <a href="https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rappport%20intgré&amp;p=30&amp;lc=0">https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rappport%20intgré&amp;p=30&amp;lc=0</a></p> <p>2018 Integrated Report -" The Board of Directors, supporting ENGIE's strategy" (p.27)  <a href="https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rappport%20intgré&amp;p=28&amp;lc=0">https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rappport%20intgré&amp;p=28&amp;lc=0</a></p> <p>2017 Registration Document -"4.4.5. Whistle-blowing and reporting of ethics incidents" (p.131) - "4.4.7. Control system" (p.132)  <a href="https://horizonlibrary.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45#v=Version1&amp;l=en&amp;p=134&amp;lc=0">https://horizonlibrary.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45#v=Version1&amp;l=en&amp;p=134&amp;lc=0</a></p> <p>engie.com internet website  <a href="http://www.engie.com/en/group/ethics-compliance/whistleblowing/">http://www.engie.com/en/group/ethics-compliance/whistleblowing/</a>  <a href="http://www.engie.com/en/group/ethics-compliance/control-system-ethics/">http://www.engie.com/en/group/ethics-compliance/control-system-ethics/</a>  <a href="http://www.engie.com/en/group/ethics-compliance/ethical-compliance-referential/">http://www.engie.com/en/group/ethics-compliance/ethical-compliance-referential/</a></p>
<p><b>Audit and internal control:</b></p> <ul style="list-style-type: none"> <li>- A self-evaluation questionnaire dealing with key ethical themes is implemented within the framework of Internal Control</li> <li>- Audits are conducted across the field of ethics and compliance policies</li> </ul>	<p>2018 Integrated Report -"An ambitious commitment in support of ethics" (p.31)  <a href="https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rappport%20intgré&amp;p=30&amp;lc=0">https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rappport%20intgré&amp;p=30&amp;lc=0</a></p>

<p>- Integration in 2016 of new ethics policies in the internal control system (respect of the policy for the prevention of conflict of interests, respect of the embargo policy); as from 2018, the Group's internal control program includes control activities related to mandatory training and / or awareness raising for those most at risk in the area of ethics and compliance in order to meet the requirements of the French Sapin II law.</p>	<p><a href="https://horizonlibrary.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45#v=Version1&amp;l=en&amp;searchText=rappport%20intgré&amp;p=30&amp;lc=0">0700dece80bb#v=Version1&amp;l=en&amp;searchText=rappport%20intgré&amp;p=30&amp;lc=0</a></p> <p>2017 Registration Document -"4.4.7. Control system" (p.132) <a href="https://horizonlibrary.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45#v=Version1&amp;l=en&amp;p=134&amp;lc=0">https://horizonlibrary.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45#v=Version1&amp;l=en&amp;p=134&amp;lc=0</a></p> <p>engie.com internet website <a href="http://www.engie.com/en/group/ethics-compliance/control-system-ethics/">http://www.engie.com/en/group/ethics-compliance/control-system-ethics/</a></p>
<p><b>Annual Ethics Compliance procedure :</b></p> <p>- The roll-out and implementation of the anti-bribery system within the Group's entities is undertaken through a procedure called the "annual ethics compliance procedure"</p> <p>- A dashboard is used to monitor implementation of the Group's ethics policy (including: distribution of ethics documentation, training, establishment of ethics procedures)</p> <p>The 2017 annual report has been submitted to the General Management Committee and the Ethics, Environment &amp; Sustainable Development Committee of ENGIE Board of Directors.</p>	<p><a href="https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rappport%20intgré&amp;p=30&amp;lc=0">2018 Integrated Report -" An ambitious commitment to ethics and compliance" (p.31)</a> <a href="https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rappport%20intgré&amp;p=30&amp;lc=0">https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rappport%20intgré&amp;p=30&amp;lc=0</a></p> <p>2017 Registration Document -"4.4.7 Control system" (p.132) <a href="https://horizonlibrary.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45#v=Version1&amp;l=en&amp;p=134&amp;lc=0">https://horizonlibrary.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45#v=Version1&amp;l=en&amp;p=134&amp;lc=0</a></p> <p>engie.com internet website <a href="http://www.engie.com/en/group/ethics-compliance/control-system-ethics/">http://www.engie.com/en/group/ethics-compliance/control-system-ethics/</a></p> <p>engie.com internet website <a href="http://www.engie.com/en/group/ethics-compliance/ethical-compliance-referential/">http://www.engie.com/en/group/ethics-compliance/ethical-compliance-referential/</a></p>
<p><b>External certification:</b></p> <p>The Group is engaged in external audit processes of its ethics and compliance system.</p> <p>- The Group anti-corruption system was certified by an external organization in 2015.</p> <p>- In 2018, the Group was awarded ISO 37001 certification in respect of its anti-corruption management systems by an external organization.</p>	<p><a href="https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rappport%20intgré&amp;p=30&amp;lc=0">2018 Integrated Report -" An ambitious commitment to ethics and compliance" (p.31)</a> <a href="https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rappport%20intgré&amp;p=30&amp;lc=0">https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rappport%20intgré&amp;p=30&amp;lc=0</a></p> <p>2017 Registration Document -"4.4.7 Control system" (p.132) <a href="https://horizonlibrary.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45#v=Version1&amp;l=en&amp;p=134&amp;lc=0">https://horizonlibrary.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45#v=Version1&amp;l=en&amp;p=134&amp;lc=0</a></p> <p>engie.com internet website <a href="http://www.engie.com/en/group/ethics-compliance/control-system-ethics/">http://www.engie.com/en/group/ethics-compliance/control-system-ethics/</a></p>



## II. Taking action in support of broader United Nations goals and issues

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

<p>Since 2013, ENGIE openly advocates for the generalization of carbon prices in the World:</p> <ul style="list-style-type: none"> <li>- To signal for low carbon investments</li> <li>- As one of the best ways to accelerate the transition</li> </ul> <p>ENGIE is Member of the World Bank Carbon Pricing Leadership Coalition (IMF, WEF, IETA, UN Global Compact, CDP, ...) which committed to :</p> <ul style="list-style-type: none"> <li>- x2 by 2020 the coverage of emissions by carbon pricing regulations</li> <li>- and x2 again the coverage by 2030</li> </ul> <p>Mr Mestrallet nominated co-president of the French Commission on carbon pricing, which made proposals to reinforce the carbon pricing signals (report submitted in July 2016)</p> <p>The ENGIE Group has committed to carbon pricing through its involvement in the Caring for Climate initiative.</p>	<p><a href="http://www.carbonpricingleadership.org/">http://www.carbonpricingleadership.org/</a></p> <p><a href="http://www.engie.com/brevet/rapport-final-prix-carbone-canfin-mestrallet-royal/">http://www.engie.com/brevet/rapport-final-prix-carbone-canfin-mestrallet-royal/</a></p> <p><a href="http://caringforclimate.org/">http://caringforclimate.org/</a></p>
<p>ENGIE respects, complies with and supports multilateral initiatives and the following international and regional legal frameworks:</p> <ul style="list-style-type: none"> <li>- the United Nations Convention Against Corruption (UNCAC – 2003);</li> <li>- the OECD Convention on Combating Bribery of Foreign Public Officials in International Business, which was first adopted in 1997 and was ratified by France in 2000;</li> <li>- the OECD Guidelines for Multinational Enterprises;</li> <li>- the Principles of the ICC (International Chamber of Commerce);</li> <li>- the Council of Europe’s Civil Law and Criminal Law Conventions on Corruption (1999);</li> <li>- the French law of November 13, 2007, the French law Sapin II, the French law on the duty of vigilance, the Bribery Act, the FCPA, the Sarbanes- Oxley Act, the Dodd Frank Act</li> </ul>	
<p>ENGIE details its contribution to the United Nation SDG for 2030</p>	<p>Cf. ENGIE.com:  <a href="https://www.engie.com/en/analysts/csr-objectives/contribution-sdg/">https://www.engie.com/en/analysts/csr-objectives/contribution-sdg/</a></p>



**Criterion 16 : The COP describes strategic social investments and philanthropy**

<p>The Group has partnered with the French public authorities to ensure that, by the end of 2017, over 900 000 customers could receive special solidarity tariffs and basic needs tariffs.</p> <p>The Group pays some €6 million a year into the Housing Solidarity Fund (FSL), in accordance with its public service agreement.</p>	<p>Cf. 2017 Registration Document - « 3.6.3. Community philanthropy, solidarity and combating energy poverty » (page 98):  <a href="https://library.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45/#v=Version1&amp;l=en&amp;p=100&amp;lc=0">https://library.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45/#v=Version1&amp;l=en&amp;p=100&amp;lc=0</a></p>
<p>The ENGIE Foundation supports projects by associations and NGOs in every region of the world, mainly – though not exclusively – in the countries in which it operates. It forms partnerships with the organizations it supports, and these partnerships are often long-term. The organizations' projects are highly diverse, but they all fall into the scope of the Foundation's key focal areas and programs: Childhood and Youth, Energy Partners, and Biodiversity and Cities.</p>	<p>Cf. ENGIE.com:  <a href="https://fondation-engie.com/en/">https://fondation-engie.com/en/</a></p>
<p>Since its creation in 2010, the ENGIE Foundation has financed 108 projects as part of its Energy Partners programs, benefiting some 275,000 people.</p>	<p>Cf. ENGIE.com:  <a href="https://fondation-engie.com/content/uploads/2018/01/rapport-annuel-fondation-enge-en_160118.pdf">https://fondation-engie.com/content/uploads/2018/01/rapport-annuel-fondation-enge-en_160118.pdf</a></p>
<p>As a committed, responsible actor, ENGIE sets great store by its corporate social responsibility and plays an active role in the development of the countries in which it operates. The Group's sponsorship policy is an expression of its social responsibility and reflects its values.</p>	
<p>In line with its values and its corporate mission, ENGIE is acting in a spirit of solidarity to promote energy access for all and fight energy poverty. Its commitment and its employees' dedication to the cause are further evidenced by the numerous competency patronage activities and NGO partnerships it has undertaken.</p>	<p>Cf. 2017 registration Document: 3.6.1 Socio economic development in local communities p 97:  <a href="https://library.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45/#v=Version1&amp;l=en&amp;p=98&amp;lc=0">https://library.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45/#v=Version1&amp;l=en&amp;p=98&amp;lc=0</a></p>
<p>Through its Rassembleurs d'Energies initiative, ENGIE provides technical and financial support to social entrepreneur projects aiming to open up sustainable energy access to vulnerable populations worldwide.</p> <p>Overview of Rassembleurs d'Energies projects</p>	<p>Cf. ENGIE.com:  <a href="https://www.engie.com/en/commitments/providing-sustainable-energy-access-for-all/">https://www.engie.com/en/commitments/providing-sustainable-energy-access-for-all/</a>  <a href="https://library.engie.com/media/a1a402ee-ae9b-47d1-9aec-e24cfdb13a78/#v=Version1&amp;l=en&amp;p=0&amp;lc=0">https://library.engie.com/media/a1a402ee-ae9b-47d1-9aec-e24cfdb13a78/#v=Version1&amp;l=en&amp;p=0&amp;lc=0</a></p>
<p>Fondation Agir Pour l'Emploi ENGIE (FAPE) works to promote occupational integration and workforce re-entry for long-term job seekers and those excluded from the job market.</p> <p>To raise funds, Fape ENGIE relies on a network of solidarity consisting of ENGIE Group companies and their current and former employees. These funds come from:</p>	<p><a href="http://www.fape-engie.fr/en/">http://www.fape-engie.fr/en/</a></p> <p>Cf. 2017 Registration Document page 65:  <a href="https://library.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45/#v=Version1&amp;l=en&amp;p=66&amp;lc=0">https://library.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45/#v=Version1&amp;l=en&amp;p=66&amp;lc=0</a></p>



<ul style="list-style-type: none"> <li>- donations from current employees, allocated through the profit sharing scheme,</li> <li>- donations from former employees,</li> <li>- companies matching employee donations.</li> </ul> <p>Additionally, Fape ENGIE receives donations from other individuals and external companies that choose to support its efforts.</p> <p>Thanks to donations from current and former Group employees, FAPE has already given its partner associations the means to finance over 93 integration projects</p> <p>At its meeting of June 28, 2018, the Executive Committee of FAPE ENGIE granted 67,500 euros in grants to 10 associations and integration companies that work to promote the integration and employment of the public who are the furthest away.</p>	<p><a href="http://www.fape-engie.fr/en/what-we-do/our-initiatives/">http://www.fape-engie.fr/en/what-we-do/our-initiatives/</a></p>
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**Criterion 17 : The COP describes advocacy and public engagement**

<p>Gérard Mestrallet, Chairman and CEO of ENGIE, defended the principle of a global carbon price at the UN Climate Summit in September 2014 in New York.</p>	<p><a href="http://www.engie.com/en/group/opinions/energy-transition-climate/speech-gerard-mestrallet-carbon-pricing/">http://www.engie.com/en/group/opinions/energy-transition-climate/speech-gerard-mestrallet-carbon-pricing/</a></p>
<p>As a leader in the energy transition, ENGIE recognises the importance of engaging international economic leaders in the climate debate. As such, Gérard Mestrallet was appointed to coordinate the Business Dialogue, a forum for exchange between prominent economic and political personalities that was launched at the Business and Climate Summit in May 2015.</p> <p>This is the second time the Business &amp; Climate Summit has been held; it opened on June 28th in London, with Segolene Royal present. The Business &amp; Climate Summit has emerged as the major get-together for the largest companies and international investors involved in the struggle against climate change. Gerard Mestrallet spoke in the final plenary session of the event, on the subject of climate policy, post-COP21.</p>	<p><a href="http://www.engie.com/en/news/gerard-mestrallet-speech-business-climate-summit/">http://www.engie.com/en/news/gerard-mestrallet-speech-business-climate-summit/</a></p>
<p>At the European Council meeting on the climate, which brought the European Union's 28 heads of State and government to Brussels on October 23 and 24, 2014, Gérard Mestrallet, Chairman and CEO of ENGIE, spoke to French newspaper Les Echos on behalf of the Magritte Group to defend the views of Europe's 10 biggest energy companies, which are in favour of an ambitious European energy policy for reducing CO<sub>2</sub> emissions.</p>	<p><a href="http://www.gdfsuez.com/groupe/opinions/strategie-groupe/interview-gerard-mestrallet-les-echos/">http://www.gdfsuez.com/groupe/opinions/strategie-groupe/interview-gerard-mestrallet-les-echos/</a></p>
<p>ENGIE has been a partner and supporter of the New World Forum since 2011.</p>	<p><a href="http://www.engie.com/en/group/opinions/groups-strategy/mestrallets-speech-new-world-forum/">http://www.engie.com/en/group/opinions/groups-strategy/mestrallets-speech-new-world-forum/</a></p>
<p>Terrawatt Initiative: At the end of 2015, ENGIE announced the launch of the Terrawatt Initiative, a global non-profit organization</p>	<p><a href="http://www.engie.com/en/news/engie-leads-the-terrawatt-initiative-at-the-united-nations/">http://www.engie.com/en/news/engie-leads-the-terrawatt-initiative-at-the-united-nations/</a></p>



<p>that works with the International Solar Alliance (ISA) and its member states to establish the regulatory conditions necessary for the mass deployment of competitive solar generation. The ISA target is 1 TW of additional solar power capacity by 2030. In this context, the International Renewable Energy Agency (IRENA) and the Terrawatt Initiative, chaired by Isabelle Kocher since the beginning of 2016, have pledged to cooperate and work on concrete ways of implementing the objectives of the Paris Agreement as soon as possible, with a specific focus on solar power generation.</p>	<p><a href="http://www.engie.com/en/innovation-energy-transition/isabelle-kocher-solarcop-marrakech-terrawatt-initiative/">http://www.engie.com/en/innovation-energy-transition/isabelle-kocher-solarcop-marrakech-terrawatt-initiative/</a></p>
<p>The “Pascal Canfin-Alain Grandjean-Gérard Mestrallet » mission assigned by Ségolène Royal, President of the COP 21.</p> <p>This initiative was responsible for:</p> <ul style="list-style-type: none"> <li>- analyzing and developing proposals for a price corridor for the European carbon market</li> <li>- developing proposals to accelerate France’s coal phase out with the introduction of a floor price for carbon in the electricity sector</li> <li>- contributing ideas to expand the scope of carbon pricing throughout the world</li> </ul> <p>The initiative heard from more the 80 experts (researchers, civil society, stakeholders and representatives from companies and governments in France, Belgium and Germany). It submitted its report containing 10 proposals in July 2016.</p>	<p><a href="http://www.engie.com/breves/intervention-prix-du-carbone-elysee/">http://www.engie.com/breves/intervention-prix-du-carbone-elysee/</a></p> <p><a href="https://www.engie.com/wp-content/uploads/2016/07/rapport-mission.pdf">https://www.engie.com/wp-content/uploads/2016/07/rapport-mission.pdf</a></p>
<p>Participation at COP 23: on the occasion of COP23, ENGIE reaffirms its commitment against global warming and pursues its low-carbon strategy.</p>	<p><a href="https://plus.google.com/collection/k3YKU">https://plus.google.com/collection/k3YKU</a></p>
<p>At the Climate Finance Day 2017 in Paris, ENGIE and eight other green bond issuers (EDF, Enel, Iberdrola, Icade, Paprec, SNCF Network, SSE and TenneT) have publicly committed to further development of one of the most dynamic segments of today’s sustainable financing, namely the green bond market.</p>	<p><a href="https://www.engie.com/en/journalists/press-releases/industrial-issuers-26-billion-in-green-bonds-pledge-to-double-down-on-green-financing/">https://www.engie.com/en/journalists/press-releases/industrial-issuers-26-billion-in-green-bonds-pledge-to-double-down-on-green-financing/</a></p>
<p>At the One Planet Summit in Paris on December 12, 2017, ENGIE committed to follow the recommendations of the TCFD in terms of reporting on the impact of climate change</p>	<p><a href="https://www.fsb-tcfd.org/wp-content/uploads/2017/06/TCFD-Supporting-Companies-28-June-2017-FINAL.pdf">https://www.fsb-tcfd.org/wp-content/uploads/2017/06/TCFD-Supporting-Companies-28-June-2017-FINAL.pdf</a></p> <p>Cf. Integrated Report p18 :</p> <p><a href="https://library.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;p=20&amp;lc=0">https://library.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;p=20&amp;lc=0</a></p> <p>Cf. ENGIE.com :</p> <p><a href="https://www.engie.com/en/analysts/integrated-performance/standards-of-csr-reporting/">https://www.engie.com/en/analysts/integrated-performance/standards-of-csr-reporting/</a></p>



**Criterion 18 : The COP describes partnerships and collective action**

<p>Various partnerships and memberships have been concluded with national and international bodies in support of ENGIE's environmental and social responsibility efforts.</p>	<p><a href="http://www.engie.com/en/analysts/partnerships-memberships/">http://www.engie.com/en/analysts/partnerships-memberships/</a></p>
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### III. CSR corporate governance and leadership

#### Criterion 19 : The COP describes CEO commitment and leadership

<p>Editorial of Gérard Mestrallet, Chairman and Chief Executive Officer of ENGIE and Isabelle Kocher, Deputy Chief Executive Officer and Chief Operating Officer of ENGIE.</p>	<p>Cf. 2018 Integrated Report pages 2-3:  <a href="https://library.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;p=4&amp;lc=0">https://library.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;p=4&amp;lc=0</a></p>
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#### Criterion 20 : The COP describes Board adoption and oversight

<p>Environmental and social responsibility is governed at the very highest level within the ENGIE Group: by the Board of Directors' Ethics, Environment and Sustainable Development Committee, the Group's Management Committee, and the Environmental and Social Responsibility Executive Committee.</p>	<p>Cf. ENGIE.com:  <a href="https://www.engie.com/en/group/governance/board-directors/board-committees/">https://www.engie.com/en/group/governance/board-directors/board-committees/</a>  <a href="https://www.engie.com/en/analysts/governance/csr-department-governance/">https://www.engie.com/en/analysts/governance/csr-department-governance/</a></p>
<p>The Ethics, Environment and Sustainable Development Committee oversees compliance with both the individual and collective values on which the Group's actions are based and with the rules of conduct that must be applied by every employee. The Committee met four times in 2017, with an average attendance rate of 85%.</p>	<p>2018 Integrated Report page 28:  <a href="https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rapport%20integrate&amp;p=30&amp;lc=0">https://horizonlibrary.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;searchText=rapport%20integrate&amp;p=30&amp;lc=0</a>            2017 Registration Document page 126:  <a href="https://horizonlibrary.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45#v=Version1&amp;l=en&amp;p=128&amp;lc=0">https://horizonlibrary.engie.com/media/dd7b9a01-107b-42e9-ace3-90e849c17f45#v=Version1&amp;l=en&amp;p=128&amp;lc=0</a></p>

#### Criterion 21 : The COP describes stakeholder engagement

<p>ENGIE's responsible growth strategy is anchored in stakeholder dialogue. In 2015, the Group bolstered its various partnerships on social and environmental issues by setting up a dedicated consultation and discussion mechanism with a group of stakeholders representing a range of social concerns.</p> <p>In addition, the Group has set a target for 2020 : to set up a suitable mechanism for dialogue and consultation with stakeholders in 100% of its industrial activities. The result reached at the end of 2017 is 48%.</p>	<p>Cf. 2018 Integrated Report p 28:  <a href="https://library.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;p=30&amp;lc=0">https://library.engie.com/media/97cb8114-0b70-4a87-99ee-0700dece80bb#v=Version1&amp;l=en&amp;p=30&amp;lc=0</a></p> <p>Cf. ENGIE.com:  <a href="https://www.engie.com/en/analysts/engie-and-society/">https://www.engie.com/en/analysts/engie-and-society/</a></p>
<p>In 2017, ENGIE updated its materiality matrix by launching a consultation that mobilized a hundred internal and external people.</p>	<p>Cf. ENGIE.com:  <a href="https://www.engie.com/en/analysts/csr-vision-issues/materiality-matrix/">https://www.engie.com/en/analysts/csr-vision-issues/materiality-matrix/</a></p>