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Communication on Progress – ENGIE and Global Compact

Category Global Compact Advanced Company

September 2019

This document shows the correspondence between the information contained in ENGIE 2019 Integrated Report published in May 2019 and the 21 'GC Advanced' criteria of the Global Compact.

The following sources are also associated with the correspondence grid:

- the ENGIE 2018 Registration Document published in March 2019
- the ENGIE website: 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?

2019 Integrated Report and 2018 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 2018 Registration Document pages 100 to 104

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

2019 Integrated Report learns from the reference framework of the International Integrated Report Council (see 2019 Integrated Report page 1).

The Group published its first report in November 2014.

The 2019 Integrated Report was published in May 2018 at the Group Annual Meeting.



I. Implementing the ten principles into strategies and operations

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

<p>The Corporate Social Responsibility policy establishes the Group's CSR priorities and commitments, consistent with the Group's various policies (environmental, HR, Ethics, Purchasing, etc.), to bring together the skills of all, create shared value and contribute to the achievement of the Sustainable Development Goals defined by the UN.</p>	<p><u>CSR Policy</u></p>
<p>CSR governance within the ENGIE Group is carried out at the highest level of the company by the Ethics, Environment and Sustainable Development Committee of the Board of Directors, by the Group Executive Committee (EXCOM) and by the CSR Executive Committee.</p> <div data-bbox="145 1010 820 1335" data-label="Diagram"> <p>The diagram titled 'CSR organization' shows a three-column structure. The first column, 'Implement the policy and share CSR best practices from BUs and the Group', includes the 'BU Management Committee' and 'Chief Sustainability Officer BU'. The second column, 'Boost the Group's CSR vision', includes the 'Executive Committee' (with 'Executive Vice President' below it) and 'CSR Management' (with 'Group Chief Sustainability Officer' below it). The third column, 'Validate the Group's level of CSR commitment', includes the 'Board of Directors' and 'Ethics, Environment and Sustainable Development Committee'. A 'Network of CSR Ambassadors' is shown at the bottom left, connected to the BU level.</p> </div> <p>The Ethics and Compliance system is managed by the Ethics Compliance and Group Privacy Department and is supported by managers with the support of the Ethics and Compliance network.</p> <p>The overall risk management is based on the following organization:</p> <div data-bbox="145 1547 820 1749" data-label="Diagram"> <p>The diagram titled 'Organization of risks' shows a three-column structure. The first column, 'Implementation', includes the 'Risk Department' (with 'Group Chief Risk Officer' below it) and 'BU Management Committee' (with 'BU Chief Risk Officer' below it). The second column, 'Supervision', includes the 'Executive Committee' (with 'Executive Vice President' below it). The third column, 'Validation', includes the 'Board of Directors' and 'Audit Committee'. Arrows indicate the flow of information and decision-making from the Risk Department and BU Management Committee up to the Executive Committee and Board of Directors.</p> </div>	<p><u>Cf.2019 Integrated Report pages 36-41 : CSR, Ethics and Compliance, Risks</u></p> <p><u>Cf.2018 Registration Document pages 136-138 : "4.1.1.2.3 Standing committees"</u></p> <p><u>Cf ENGIE.com:Board committees</u></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"> - the Business Unit CSR Responsibility managers (one in each BU, member of the Management Committee of the Business Unit) 	<p><u>Cf. ENGIE.com : CSR governance</u></p>



<p>- members of the Corporate CSR Department</p> <p>Two committees chaired by the CSR Department were created in 2017:</p> <ul style="list-style-type: none"> • The Green Bond Committee, a transversal Committee responsible for validating projects that could be financed by Green Bonds issued by the Group • the vigilance Committee set up to ensure the establishment and monitoring of vigilance plans in the framework of the duty of vigilance law <p>More broadly, the CSR Department has also launched a network of CSR ambassadors open to all employees of the Group.</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.</p> <p>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.</p> <p>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 & 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>On, 14 June 2019, ENGIE launched a EUR 1.5 billion bond issuance in green bonds format: the issuance proceeds will be used exclusively to finance numerous green projects in the area of renewable energies and energy services developed by the Group across the world.</p> <p>With this new issue, the total outstanding amount of green bonds issued by ENGIE is EUR 8.75 billion, meaning that the Group is now the largest corporate issuer of green bonds.</p>	<p><u>Cf. 2018 Registration Document pages 176 to 179 : "5.1.5.4 Green Bonds"</u></p> <p><u>Cf. ENGIE.com</u>: sustainable finance</p> <p><u>Cf Press release</u></p>
<p>The Group applies ten non-financial criteria relating to ethics, CO₂ emissions, social impact, human resources, environmental management of</p>	



ecosystems, stakeholder involvement, local purchasing and health and safety to all of its investment projects. Furthermore, the Group takes account of the CO₂ cost of its investments. These criteria are presented, analyzed and evaluated for each new investment project of a certain amount.

Cf.: ENGIE.com CSR criteria

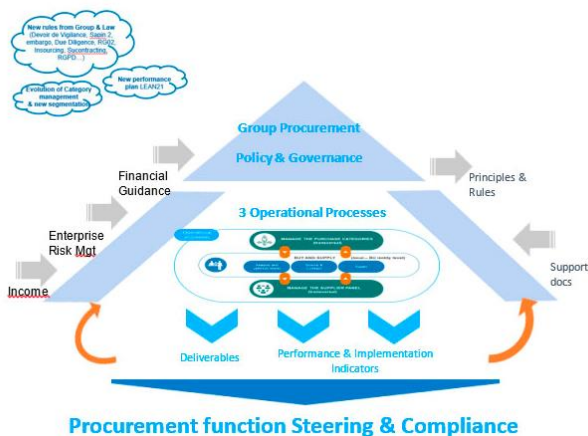
Criterion 2 : COP describes value chain implementation

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.

ENGIE's commitments in its relationship with its suppliers are the pursuit of competitiveness and sustainable solutions while ensuring the health and safety of its employees, and in strict compliance with the principles of business ethics.

The purchasing policy defines ENGIE's commitments and requirements in the following areas:

- Compliance with health and safety rules: suppliers must demonstrate that they meet these requirements
- Social responsibility, business ethics, embargoes and the fight against corruption. corruption: commitment of suppliers to ethical business conduct
- Sustainable development: ensuring competitive offers and sustainable and innovative solutions



Cf ENGIE procurement policy

Cf. 2018 Registration Document page 103 “ 3.7 Purchasing, Subcontracting and Suppliers”

7 principles in our relationships with suppliers

Following an assessment campaign started at the end of 2018, ENGIE signed a long term services contract with EcoVadis. This new partnership will help the Group to monitor its main suppliers panel in a CSR perspective EcoVadis has developed a methodology for assessing company CSR engagement against 21 CSR criteria and analyses multiple data sources by CSR experts.

Cf.ENGIE.com : sustainable purchasing



<p>In addition to a continuous assessment of the Preferred and Major Suppliers, ENGIE manages (with the support of EcoVadis) both a risk mapping per purchasing categories and a country risk assessment to optimize supplier relationship management.</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.</p> <p>In addition, in 2018, training was given to 840 buyers on advanced purchasing controls incorporating the requirements of the new laws (Duty of Care and Sapin 2).</p>	<p><u>Cf. 2018 Registration Document page 103 " 3.7Purchasing, Subcontracting and Suppliers"</u></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><u>https://www.engie.com/en/commitments/procurement/</u></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 "Human Rights" referential and policy 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>Cf. 2019 Integrated Report - "Ethics and compliance" (p.38)</p> <p>Cf. 2018 Registration Document - "4.2.3 Reference texts" (p.167)</p> <p>Cf. 2018 Registration Document - "4.3 Vigilance plan" (p.169)</p> <p>Ethics charter</p> <p>Practical guide to ethics</p> <p>Cf. ENGIE.com - Human rights referential</p> <p>Cf. ENGIE.com - vigilance plan</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>Cf. ENGIE.COM – Human rights referential</p> <p>Cf. 2019 Integrated Report- „Ethics and compliance" (p 38)</p>
<p>The vigilance plan covers all the measures established by ENGIE SA to prevent for its activities and those of its controlled subsidiaries serious violations regarding human rights and fundamental freedoms, the health and safety of individuals and the environment according to its ethical and social responsibility commitments. The Group's adherence to international standards on human rights, including the health and safety of persons and the environment is the foundation</p>	<p>Cf. 2018 Registration Document - "4.3 Vigilance plan" (p.169)</p> <p>Cf. ENGIE.com – vigilance plan</p>



<p>of the commitments that the Group intends to apply wherever it operates.</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>In 2018, this clause (ethics and vigilance) was updated and so were the Group's due diligence policies (investment projects, sponsorship, patronage, suppliers and sub-contractors, business consultants), in order to include the challenges related to the duty of vigilance.</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. In 2019, a new internal in-person training module on the human rights approach at ENGIE (which replaces an in-person training module offered via the association EDH ("companies for human rights") since many years) has been made available.</p> <p>Scribings, including one on human rights and another one on the Group's whistleblowing system which covers all the challenges of vigilance, were made accessible for all the Group's employees in 2018.</p>	<p>Cf. 2018 Registration Document - "4.3 Vigilance plan" (p.169)</p> <p>Cf. ENGIE.com : vigilance plan</p> <p>Cf. 2018 Registration Document – "4.2.5 Training and awareness" (p 169)</p> <p>Cf ENGIE.com</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 are the result of a broad consultation with operational entities and support functions. They complement specific human rights policies (such as health & 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>The Group's commitments to respect human rights are based on the mapping of human rights issues which was updated in 2018 as part of the Group's vigilance plan which is presented in the Registration Document and on the public internet site of the Group. This vigilance plan, adopted in 2018 as required by the French law on the duty of vigilance of parent companies and principals, aims to identify and prevent serious risks to people and to the environment. It is based on the Human Rights Referential policies and also generally covers the Group's commitments in terms of human rights, helping their implementation on an operational level.</p>	<p>Cf. 2018 Registration Document - "4.3 Vigilance plan" (p.169)</p> <p>Cf. ENGIE.com : vigilance plan</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><u>Cf. ENGIE.com – references and memberships/</u></p> <p><u>Cf EDH website</u> <u>www.e-dh.org</u></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><u>Cf. Bettercoal website</u></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. The vigilance plan is based on the Group's transversal processes, including those in respect of the identification and management of risks specific to each issue or area of vigilance, including risks related to human rights.</p>	<p><u>Cf. 2019 Integrated Report - "Ethics and compliance" (p.38)</u></p> <p><u>Cf. 2018 Registration Document - "4.2.3 Reference texts" (p.167)</u> <u>Cf. 2018 Registration Document : « 4.3 Vigilance plan » (p 169)</u> <u>Cf. ENGIE.com: Vigilance plan</u> <u>Cf. ENGIE.com :Human rights referential</u></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>The vigilance plan, which aims to identify and prevent the risks of negative impacts on people and the environment related to the Group's activities, is based amongst others on the Group's vigilance measures related to human rights. The Group's measures to prevent and manage the major risks in that respect, are specified in the vigilance plan. A report on the effective implementation of the plan is presented annually to the Committee on Ethics, Environment and Sustainable Development of the ENGIE Board of Directors</p>	<p><u>Cf. 2019 Integrated Report - "Ethics and compliance" (p.38)</u></p> <p><u>Cf. 2019 Integrated Report : "Significant involvement of the Board and its Committes in 2018" (p 32)</u></p> <p><u>Cf. 2018 Registration document - "4.2.2. Risk assessment" (p.167)</u> <u>Cf. 2018 Registration Document: "4.2.3 Reference texts" (p 167)</u> <u>Cf. 2018 Registration Document: "4.3 Vigilance plan" (p 169)</u> <u>Cf: ENGIE.com : Ethics risks analysis</u> <u>Cf. ENGIE.com : Due diligence</u> <u>Cf. ENGIE.com : Human rights referentials</u> <u>Cf. ENGIE.com : Vigilance plan</u></p>
<p>At the operational level, annual human rights risks assessments are conducted by entities and reported trough 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><u>Cf. 2019 Integrated Report - "Ethics and compliance" (p.38)</u></p> <p><u>Cf. 2018 Registration Document - "4.2.3. Reference texts" (p.167)</u> <u>Cf. 2018 Registration Document : "4.3 Vigilance plan"(p 169)</u> <u>Cf. ENGIE.com : Risks analysis</u> <u>Cf. ENGIE.com : Human rights referential</u> <u>Cf. ENGIE.com : Vigilance plan</u></p>

<p>In the form of checklists, they aim to support managers for the risks analysis required. These tools are deployed since 2014 and are regularly updated. In 2018, questions relating to risk factors (such as country, type of workforce, presence of vulnerable populations) were added as part of the annual review of the Group's "human rights infringement" risk. This strengthening of the annual risk review process allows entities to better identify their own specific risks and target actions to control and monitor risks.</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>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, health and safety, social & environmental responsibility clause in the general conditions of purchase, whistleblowing) and the training for the actors in the Purchasing function.</p>	<p><u>Cf. ENGIE.com</u> : procurement policy</p> <p><u>Cf. ENGIE.com</u> : Integrity referential</p> <p><u>Cf.2019 Integrated Report -"Ethics anc compliance" (p.38)</u></p> <p><u>Cf.2018 Registration Document</u> : "3.7 Purchasing, subcontracting and Suppliers"(p 103)</p> <p><u>Cf.2018 Registration Document</u> : "4.2.5 training and awareness" (p 168)</p> <p><u>Cf.2018 Registration Document</u> : "4.3 Vigilance plan" (p 169)</p> <p><u>Cf. ENGIE.com</u> : Human Rights Referential</p> <p><u>Cf. ENGIE.com</u> : Vigilance plan</p> <p><u>Cf. ENGIE.com</u> : Ethics and compliance- our approach - training</p>
<p>Training on human rights is available for all employees, amongst which an e-learning on human rights which has been available to all Group employees since October 2016. In 2019, a new internal in-person training module on the human rights approach at ENGIE (which replaces an in-person training module offered via the association EDH ("companies for human rights") since many years) has been made available.</p> <p>Scribings, including one on human rights and another one on the Group's whistleblowing system which covers all the challenges of vigilance, were made accessible for all the Group's employees in 2018.</p>	<p><u>Cf.2018 Registration Document</u> -"4.2.5. Training and awareness" (p.168)</p> <p><u>Cf. ENGIE.com</u> : Ethics and compliance- our approach - training</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.</p> <p>Within the General Secretariat, the Ethics, Compliance & Privacy Department coordinates the implementation, with the support of a global network of more than 300 persons.</p> <p>Managers and ethics and compliance officers must ensure that the conditions for its implementation in their entities are met.</p> <p>Fully linked to the company's ethics organization, the vigilance plan, which is based amongst others on the Group's vigilance</p>	<p><u>Cf.2019 Integrated Report</u> : " Ethics and compliance" (p 38)</p> <p><u>Cf.2018 Registration Document</u> -"4.2.1. Organization and structure" (p.167)</p> <p><u>Cf.2018 Registration Document</u> "4.3 Vigilance plan » (p169)</p> <p><u>Cf. ENGIE.com</u> : main parties involved in Ethics</p> <p><u>Cf. ENGIE.com</u> : Human rights referential</p> <p><u>Cf. ENGIE.com</u> : Vigilance plan</p>



measures related to human rights, benefits from governance, monitoring mechanisms, resources and associated actors, and is supervised at the highest level of the Group. Its management has been entrusted by the Group's Executive Committee to the Ethics, Compliance & Privacy Department. A report on the effective implementation of the plan is presented annually to the Committee on Ethics, Environment and Sustainable Development of the Board of Directors

To ensure that the vigilance plan is implemented and to coordinate the various steps involved, a specific inter-directional committee was set up by the Group. It is in particular responsible for ensuring that the plan is properly disseminated, that the various measures are coordinated, that the entities are made aware of it and for facilitating the feedback of information for the Group's reporting requirements.

In 2018 the Group entities were asked to contribute, at their level and within their direct and indirect subsidiaries, to the ownership, dissemination and implementation of the vigilance plan. The monitoring of these actions by the entities is included in the annual compliance report.



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 & 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>To ensure that the vigilance plan is implemented and to coordinate the various steps involved (including those relating to vigilance in regard of human rights), a specific inter-directional committee was set up by the Group in 2017. It is in particular responsible for ensuring that the plan is properly disseminated, that the various measures are coordinated, that the entities are made aware of it and for facilitating the feedback of information for the Group's reporting requirements.</p>	<p><u>Cf.2019 Integrated Report : "Ethics and compliance" (p 38)</u> <u>Cf.2018 Registration Document -"4.2.6. Controls and certifications" (p.168)</u> <u>Cf.2018 Registration Document : "4.3 Vigilance plan" (p 169)</u></p> <p><u>Cf. ENGIE.com : Control system</u> <u>Cf. ENGIE.com : Human rights referential</u> <u>Cf. ENGIE.com : Vigilance plan</u></p>
<p>The Human Rights referential and policy as well as the Group's vigilance plan which is based amongst others on the Group's vigilance measures related to human rights, fall within the scope of the annual compliance procedure (procedure that relies on the dedicated Group tool "REPORT'ethics") : 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>In 2018 the Group entities were asked to contribute, at their level and within their direct and indirect subsidiaries, to the ownership, dissemination and implementation of the vigilance plan. The monitoring of these actions by the entities is included in the annual compliance report.</p>	<p><u>Cf.2018 Registration Document : « 4.3 Vigilance plan »(p 169)</u></p> <p><u>Cf. ENGIE.com : control system</u> <u>Cf. ENGIE.com : Ethical compliance referential</u> <u>Cf. ENGIE.com : Human rights referential</u> <u>Cf. ENGIE.com : Vigilance plan</u></p>
<p>The internal ethics incidents reporting procedure (which relies on the dedicated Group tool "INFORM'ethics") includes explicitly human rights incidents.</p>	<p><u>Cf.2019 Integrated report : "Ethics and compliance" (p 38)</u> <u>Cf.2018 Registration Document -"4.2.4. Whistleblowing and reporting of ethics incidents" (p.168)</u></p> <p><u>Cf. ENGIE.com : Ethical compliance referential</u></p>
<p>ENGIE maintains constant and proactive dialogue with its stakeholders, through dedicated operational mechanisms for</p>	<p><u>Cf.2019 Integrated Report -"A zero-carbon transition that benefits all our stakeholders" (p.42)</u> <u>Cf.2018 Registration Document: "4.3 Vigilance plan" (p 169)</u></p>



<p>dialogue and consultation and by its participation to voluntary initiatives.</p> <p>The vigilance plan and its operational implementation have been presented in 2018 and will in the future be regularly presented to employee representative bodies via the existing committees: the European Works Council, the Committee on Ethics, the Environment and Sustainable Development, and the Board of Directors. The entities must present the vigilance plan and the obligations arising from the French law on the duty of vigilance to their employee representative organizations.</p> <p>To prevent and manage as effectively as possible the impacts of its activities, amongst others in the field of human rights, the Group has adopted a specific policy on "dialogue with stakeholders", a component of the Group's CSR policy.</p>	<p>Cf. ENGIE.com : vigilance plan Cf. ENGIE.com : Stakeholder engagement</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, the Group's whistleblowing system is open to all employees and to all external stakeholders and covers all the challenges of vigilance (linked to the Group's ethical commitments). For issues of a commercial nature, stakeholders have access to the Mediator of the Group.</p> <p>In 2017 the Group set a new policy on whistleblowers that incorporates the French legal requirements of the Sapin 2 law and the duty of vigilance law. Within the framework of this policy which has been implemented gradually since 2018 in view of its Group-wide deployment in 2019, an alert can be issued, anonymously or not, via email or by phone. It is received by an external service provider that transmits the report in anonymized form to ENGIE for processing.</p>	<p>Cf.2018 Registration Document -"4.2.4. Whistleblowing and reporting of ethics incidents" (p.168)</p> <p>Cf.2018 Registration Document : "4.3 Vigilance plan" (p 169)</p> <p>Cf. ENGIE.com : Whistleblowing system Cf. ENGIE.com : Human rights referential Cf. ENGIE.com : Vigilance plan Cf.2019 Integrated Report -"Ethics and compliance" (p.38)</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>In its Global Agreement on Fundamental Rights, Social Dialogue and Sustainable Development signed in 2010, ENGIE recalls that it fully supports international standards, including the Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises, the ILO Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy and the UN Global Compact.. These instruments incorporate, among others, the rights elaborated in the ILO Declaration of Fundamental Rights at Work (Freedom of Association and Collective Bargaining, conventions 87 and 98; Discriminations, conventions 100 and 111; Forced Labour, conventions 29 and 105; Child labour , conventions 138 and 182) and convention 94 concerning Labour Clauses in public Contracts.</p> <p>The principles contained in all of the listed instruments are considered to be part of this agreement.</p>	<p><u>Cf engie.com : Social Dialogue</u></p>
<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 in 2018</p>	<p><u>Agreements and fundamental principles of the Health and Safety Policy</u> <u>Cf 2019 Integrated Report page 34 : "Human resources"</u></p>
<p>The Group has set a new goal for 2020 an internal occupational accident frequency rate of lower or equal to 3</p> <p>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</p>	<p><u>Cf. 2019 Integrated Report page 7 : "Our performance"</u> <u>Cf 2019 Integrated Report page 34 : "Human Resources"</u> <u>Cf 2019 Integrated Report page 53 : "Ensuring an inclusive working environment"</u> <u>Cf 2019 Integrated Report page 60 : "Social indicators"</u></p>



<p>2008 and down 8% compared with 2016).Thereby the frequency rate is of 3.4 in 2018.</p>	<p><u>Cf. 2018 Registration Document page 76: Health and safety Policy – 3.4.6.1 the results</u></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.</p> <p>In 2016 a seminar gathered HR-Health and Safety network and workforce representatives to share practices for auditing and 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 2018 to review the implementation of these commitments</p>	<p><u>Cf 2018 Registration Document page 77 « 3.4.6.5 Dialogue with social partners »</u></p>
<p>The Group is engaged in the fight against discrimination. He is a signatory to the ILO Global Business and Disability Charter in 2016, the Other Circle LGBT Engagement Charter in 2017 and the European Embrace Difference manifesto alongside 50 other major groups. as part of its participation in ERT (European Round Table of Industrialists).</p>	<p><u>Cf. 2019 Integrated Report « Our commitments » pages 28-29</u></p> <p><u>Cf. Global Business and Disability Charter</u></p> <p><u>Cf. l'autre cercle LGBT Charter</u></p> <p><u>Cf. European manifesto « Embrace difference »</u></p>
<p>The Group continues its efforts in diversity and has set a 2020 target: 25% of women in the Group's workforce.</p> <p>At the end of 2018, women represent 21.1% of the workforce.</p>	<p><u>Cf. 2019 Integrated Report page 7 : “ our performance “</u> <u>Cf. 2019 Integrated Report page11 : “Our objectives”</u> <u>Cf. 2019 Integrated Report page 53 :” Ensuring an inclusive working environment “</u> <u>Cf. 2019 Integrated Report page 60 :” Social indicators “</u></p> <p><u>Cf.2018 Registration Document : pages 73-74: 3.4.3:”Social commitment : Building a company committed to corporate citizenship and solidarity”</u></p>
<p>Engie works to promote diversity of business by raising awareness: "I learn Energy", "Elles bougent", "Girls and Boys day day.</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><u>« J'apprends l'énergie »</u> <u>« Elles bougent »</u></p> <p><u>Cf. 2018 Registration Document : 3.4.3 “Social commitment : Building a company committed to corporate citizenship and solidarity” pages 73-74</u></p>
<p>In 2019, the Group strengthened its commitment to youth employment by joining the global initiative Global Alliance For YOUth. The ambition of this expanded initiative is to impact 6 million young people under 30 by 2022 to help them develop their future</p>	<p><u>Global alliance for YOUth</u></p>



<p>employability. ENGIE has set a goal of receiving 10% of work-study students in France under 3 years and in Europe under 5 years.</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"> - Accelerate the shift towards future-oriented activities - Organize the internal transfer of skills - Create a technical network - Organize the management of external skills - Fostering an entrepreneurial spirit among employees <p>In 2018, an analysis of major trends and issues in terms of skills was conducted and an educational and operational action plan was conducted.</p> <p>In 2018, 66.1% of the Group's workforce took a training course, thus respecting the target (2/3 of all employees to take a course). More than 6,600 transfers took place in 2018 and the Group hired over 29,700 new employees worldwide.</p>	<p><u>Cf. 2019 Integrated Report page 34 : « Adapting skills to new businesses »</u></p> <p><u>Cf. 2018 Registration Document 3.4.1.1 «Anticipation of the skills needed to prepare for the future» (p 71) :</u></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><u>Cf. 2018 Registration Document -3.4.1 «Human resources development and mobility policy» (p.71)</u></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><u>Cf. 2018 Registration Document - 3.4.5 « Social relations » (p.76)</u></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><u>ENGIE signs an ambitious Europe-wide Social Policy Agreement in support of its enterprise project</u></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><u>Cf ENGIE.com: Social dialogue</u> <u>Cf. 2018 Registration Document : 3.4.5: "Group collective bargaining agreement" p 76</u></p>
<p>A new "Leadership Model," in line with the Group's strategy and its transformation, was rolled out to managers. The Leadership Way identifies 4 behaviors core (Bold, Open, demanding, Caring) and 5 goals of Leader to inspire everyday behaviors and impact the team members.</p> <p>To support its deployment, the Co-Leaders training was launched in 2017 and attended by 23,000 managers at the end of 2018.</p> <p>The ENGIE Boost initiative, launched in 2018, aims to identify, develop, motivate, and retain High Potential talent at all levels of the organization, in order to prepare them for the Group's most strategic roles.</p>	<p><u>Cf.2018 Registration Document :3.4.1.4"Targeted development policies" page 72</u></p> <p><u>Cf.2018 Registration Document :3.4.1.4"Targeted development policies" page 72</u></p>
<p>ENGIE is investing heavily in training its employees in health and safety and raising their awareness of the issue. In 2018, 1000 additional managers took the 'Leadership in Health and Safety' course. In 2018, the members of the Group COMEX continued to realize security managerial visits</p>	<p><u>Cf.2018 Registration Document 3.4.6 "Health and Safety policy" page 76-77</u></p>



<p>A managerial programme comprising an action plan for 2016-2020, training programmes, internal audits and inspections, external certification, benchmarking and feedback, reinforced 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><u>Cf. 2018 Registration Document : 3.4.6 « Health and safety policy » page 76</u></p>
<p>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.</p>	<p><u>Cf. 2019 Integrated Report p 53: “Ensuring an inclusive working environment”</u> <u>Cf. ENGIE.com : Diversity policy</u></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 2018, the Group’s employment rate in France was 4.8%. the Group signed in 2018 a new agreement 2018-2020 aiming to:</p> <ul style="list-style-type: none"> - to promote the recruitment of people with disabilities - to accompany and propose the necessary adjustments - to support changes in career paths - to develop purchases in the protected and adapted sector 	<p><u>Cf. 2018 Registration Document - 3.4..3 «Social commitment : building a company committed to corporate citizenship- and solidarity Employees with disabilities» (p.74):</u></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><u>Cf. 2018 Registration Document -3.4.3 «Social commitment : building a company committed to corporate citizenship and solidarity» (p.74)</u></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>The health and safety results are monitored by the EXCOM, the Board of Directors and the EESDC and points are presented to the ENGIE 50.</p>	<p><u>Cf. 2018 Registration Document:3.4.6 « health and safety policy » (p.76)</u></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><u>Cf. ENGIE.com : Note on the methodology of social indicators</u></p> <p><u>Cf. ENGIE.com : Social reporting</u></p>
<p>ENGIE has adopted a social reporting method that has been checked against the AA1000 standards by its statutory auditors.</p>	<p><u>Cf. ENGIE.com: Note on the methodology of social indicators</u></p> <p><u>Cf. ENGIE.com: Social reporting</u></p>
<p>The Group has renewed in October 2017 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><u>Cf. 2018 Registration Document 3.4.3 «Social commitment : building a company committed to corporate citizenship and solidarity» (p.73)</u></p> <p><u>Cf: 2019 Integrated Report p 29: Our commitments</u></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"> • the Convention on Biological Diversity • the Millennium Development Goals • the United Nations Framework Convention on Climate Change. 	
<p>The Group has set new environmental targets for 2020 which:</p> <ul style="list-style-type: none"> • Share of renewable energy in the production capacity mix in 2020 : 25% • -20% CO2 emission reduction rate for power generation compared with 2012 <p>The results in 2016 are the following:</p> <ul style="list-style-type: none"> • Share of renewable energy in the production capacity mix: 19,5% • CO2 emission reduction rate for power generation compared with 2012 : -11,3% 	<p><u>Cf ENGIE.com: Press release</u></p> <p><u>Cf. 2019 Integrated Report page 7 : "Our performance"</u></p> <p><u>Cf. 2019 Integrated Report page 11 : "Our objectives"</u></p> <p><u>Cf. 2019 Integrated Report page 44-47 : "A sustainable zero- carbon transition"</u></p> <p><u>Cf. 2019 Integrated Report page 59 : "Environmental indicators"</u></p> <p><u>Cf ENGIE.com: CSR objectives</u></p> <p><u>Cf. 2018 Registration Document : "1.2.2 CSR indicators "p15</u></p>
<p>In February 2018, ENGIE has updated its environmental policy.</p>	<p><u>Cf. ENGIE.com : CSR policy</u></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"> • identify and publicize internally all the benefits and opportunities related to actions in favor of biodiversity; • set up on the Group's sites voluntary and concerted approaches with stakeholders; • to anchor biodiversity as an integral dimension of the Group's performance. <p>As part of the <u>Act4nature</u> initiative, on July 10, 2018, ENGIE joined forces with around 60 companies to protect biodiversity by adhering to the 10 common commitments and adding <u>specific commitments</u> to the Group.</p>	<p>Cf. ENGIE's Act4nature commitment: <u>Act4nature</u></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</p>	<p><u>Cf. ENGIE.com: ENGIE water rules and commitments</u></p> <p><u>Cf CEO Water Mandate COP 2018</u></p>



<p>initiative that the Group has endorsed since its launch. Every year, ENGIE submits a progress report to the CEO Water Mandate.</p>	
<p>ENGIE has signed the Energy Efficiency Charter for Public and Private Commercial Buildings.</p>	<p><u>Charter updated in 2017</u> <u>2018 Communication on Progress</u></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 SO₂, NO_x and particulate matter.</p>	<p><u>Cf.2019 Integrated Report : "A sustainable zero- carbon transition" pages 44-45</u> <u>Cf 2018 Registration Document 3.5.4.7 "Atmospheric pollutants" p 99</u></p>
<p>The Group's procurement policy sets down the following principles for sourcing:</p> <ul style="list-style-type: none"> • 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. • 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. 	<p><u>Cf 2018 Registration Document 3.7 "Purchasing and suppliers" p 103</u></p> <p><u>Cf. ENGIE.com</u> : sustainable purchasing</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><u>Cf. ENGIE.com: Note on the methodology of environmental indicators</u> <u>Cf. ENGIE.com: Environmental reporting</u></p>
<p>Its environmental reporting has been checked against the AA1000 standards by its statutory auditors.</p>	<p><u>Cf ENGIE.com: Statutory auditors certification</u> <u>Cf.ENGIE.com Statutory auditors reasonable assurance on a selection of social and environmental information</u></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>Cf <u>ENGIE.com: water</u></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"> - the Business Unit Environmental and Societal Responsibility managers (one in each BU, member of the Management Committee of the Business Unit) - members of the CSR Division 	<p><u>Cf. ENGIE.com: CSR Governance</u></p>
<p>The Group has mapped the environmental and health risks it may encounter.</p> <p>The Group was the subject, in 2018, of 24 complaints and 0 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 2018, the Group's expenditure on the environment (investments and operating costs linked to environmental conservation) totaled more than €411 M€</p>	<p><u>Cf.2018 Registration Document page 99 : 3.5.4.9 : « Active prevention of environmental risks »</u></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><u>Cf. ENGIE.com : environmental reporting</u></p>
<p>ENGIE has adopted an environmental reporting method that has been checked against the AA1000 standards by its statutory auditors.</p>	<p><u>Cf. ENGIE.com: Methodology on the environmental indicators</u> <u>Cf Statutory auditors certification on CSR information published</u> <u>Cf. Statutory auditors reasonable assurance on a selection of CSR information</u></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 Executive Committee and the Board of Directors' Ethics, Environment and Sustainable Development Committee every year.</p>	<p><u>Cf. 2019 Integrated Report page 32:"Significant involvement of the Board and its Committees in 2018"</u> <u>Cf. 2018 Registration Document "4.1.1.2.3 page 136 "Standing Committees"</u></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 2018, the Group scored A for CDP Climate and A- for CDP Water.</p>	<p><u>Cf. CDP website</u></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, ENGIE's Practical guide to ethics forbids corruption in all its forms, 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 has been reiterated by Isabelle KOCHER, CEO of ENGIE on several occasions (e.g. when the Ethics charter and Practical guide to ethics were updated): «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. 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.» Isabelle KOCHER, CEO, November 2016, introduction of ENGIE Ethics Charter</p>	<p>Reporting on the 10th principle against corruption: " 1 Commitment and policy" B1-B + D1-D5 (p 7-14) Cf. <u>2019 Integrated Report - "Ethics and compliance" (p38)</u></p> <p>Cf. <u>2018 Registration Document -"4.2. Ethics, compliance and privacy" (p.167)</u></p> <p>Cf. <u>2018 Registration Document : "4.2.3 reference texts" (p 167)</u></p> <p><u>Cf. ENGIE.com : Integrity referential</u></p> <p>engie.com internet website <u>http://www.engie.com/en/group/ethics-compliance/main-parties-involved-in-ethics/</u></p> <p><u>ENGIE Ethics charter</u></p>
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<p>In the framework of its anti-corruption program, the Group has implemented specific policies (including updated versions or newly issued versions in 2018 to address in particular the requirements of the French Sapin II law and the French law on the duty of vigilance) relating to:</p> <ul style="list-style-type: none"> - Due diligence: the Group has adopted several ethical due diligence policies regarding: <ul style="list-style-type: none"> - Business consultants - Investment project partners - Recipients of corporate sponsorship and patronage - Suppliers and direct sub-contractors - Gifts and hospitality - The prevention of conflicts of interests - Lobbying - The integration of an ethical, health & safety, social & environmental responsibility clause in contracts with suppliers, service providers, subcontractors and partners of the Group <p>ENGIE developed its own internal capacity to carry out ethics due diligence; since 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>Cf. 2019 Integrated Report - "Ethics and compliance" (p.38) Cf. 2018 Registration Document : "4.2.3 Reference texts" (p 167) Cf. ENGIE.com : Integrity referential Cf. ENGIE.com : Due diligence approach Cf. ENGIE.com : interests representation</p>
<p>The Group requires its suppliers to acquaint themselves with and support, its commitment regarding ethics and sustainable development as stipulated in the Ethics charter, the Practical guide to Ethics, the procurement policy, the document "ethics business relationships: governing principles", the code of conduct in supplier relations, and issued on its website.</p>	<p>Cf. ENGIE.com : Procurement Cf. ENGIE.com : Integrity referential Cf. ENGIE.com : Codes of conduct</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 10th principle against corruption "2. Implementation" B3-B6 + D6-D11 (p 14-24)</p>
<p><u>Risk assessment</u></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). The assessment of the corruption risk in the framework of this process is mandatory and is based on a methodology common to all Group entities which draws on a multi-item assessment grid.</p> <p>The results of the ethics risk analysis 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>In order to implement its ethics policy and its commitment to fight against corruption, the Group also conducts ethics risks assessments prior to entering into transactions that are presented to the ENGIE commitments committee, contracts with business consultants, sponsorship/patronage contracts, and contracts with suppliers and subcontractors (due diligence policies).</p>	<p>Cf. <u>2019 Integrated Report : "Ethics and compliance" (p 38)</u> Cf. <u>2018 Registration Document- "4.2.2. Risk assessment" (p.167)</u></p> <p><u>Cf. ENGIE.com : Ethical risks analysis</u></p>



<p>A <u>dedicated organization</u> 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 & 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 & 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 & Privacy Department. Since 2018, the Ethics, Compliance & Privacy Department has expanded its scope of intervention to become the competent department for all issues requiring the implementation of a compliance procedure. The Group Ethics, Compliance and Privacy Department is thus responsible for personal data protection, export controls and embargoes, interest representation and trade secrets.</p> <p>The Ethics, Environment and Sustainable Development Committee met 4 times in 2018 and handled the recurring themes and current topics related to ethics.</p> <p>Privacy Department is thus responsible for personal data protection, export controls and embargoes, interest representation and trade secrets.</p> <p>The Ethics, Environment and Sustainable Development Committee met 4 times in 2018 and handled the recurring themes and current topics related to ethics.</p>	<p>Cf. <u>2019 Integrated Report</u> : " <u>Ethics and compliance</u>" (p 38)</p> <p>Cf. <u>2019 Integrated Report</u> " <u>Significant involvement of the Board and its Committees in 2018</u>" (p 32)</p> <p>Cf. <u>2018 Registration Document</u>- "<u>4.2.1 organization and structure</u>" (p 167)</p> <p>Cf. <u>2018 Registration Document</u>: "<u>4.1.1.2.3 Permanent Committees – Ethics , Environment and Sustainable Development Committee »</u>" (p 138)</p>
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<p>The Ethics charter, which sets the general framework for the professional behavior of every employee:</p> <ul style="list-style-type: none"> - The Group's Ethics charter and the Practical guide to ethics, updated in 2016; are available via the Group's internet website and published in 20 languages. These reference documents forbid bribery and corruption. - The Ethics charter and the Practical guide to ethics were massively distributed to employees when updated in December 2016, and to all new employees who commit to respect the ethics principles. 	<p><u>Cf. 2019 Integrated Report - "Ethics and compliance » (p.38)</u></p> <p><u>Cf. 2018 Registration Document - "4.2.3. Reference texts" (p.167)</u></p> <p><u>Cf. ENGIE.com : Principles and commitments</u></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 (Group policy on the incorporation of ethics in HR processes).</p>	<p><u>Cf. ENGIE.com : ethical compliance referential</u></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 (Group policy on the incorporation of ethics in HR processes).</p>	<p><u>Cf. ENGIE.com : ethical compliance referential</u></p>
<p><u>Communication, manager training and employee awareness developed within the Group</u></p> <p>The specific training on the risk of fraud and corruption has been attended by 91% of the senior executives as at end of 2018. 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>E-learning and scribings are accessible to all employees.</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><u>Cf. 2019 Integrated Report : "Ethics and compliance" (p 38)</u></p> <p><u>Cf. 2018 Registration Document : "4.2.5 Training and awareness" (p 168)</u></p> <p><u>Cf. ENGIE.com : training</u></p>



<p><u>Initiatives</u></p> <p>The Group is involved in several multilateral international anti-corruption initiatives, such as:</p> <ul style="list-style-type: none">- UN Convention against Corruption (UNCAC)- The OECD anti-corruption initiative <p>The Group is a member of several think tanks specialized in ethics:</p> <ul style="list-style-type: none">- Institute for Business Ethics (I.B.E.)- Cercle Ethique des Affaires (CEA) en France- Transparency International France	<p>Cf. <u>2018 Registration Document -“4.4.1. Ethics, compliance and privacy” (p 167)</u></p> <p>Cf. <u>ENGIE.com</u> :references and memberships</p>
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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 & Privacy Department, which is accountable to the General Secretariat and works under the supervision of the Chief Executive Officer.</p>	<p>Reporting on the 10th principle against corruption "3. Monitoring" B7 + D12-D15 (p 25-27)</p> <p><u>Cf. 2019 Integrated Report -"Ethics and compliance" (p.38)</u></p> <p><u>Cf. 2018 Registration Document -"4.2.6. Control and certifications" (p 168)</u></p> <p><u>Cf. ENGIE.com : control system</u></p>
<p><u>Ethics incidents:</u></p> <ul style="list-style-type: none"> - A 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. Within the framework of this policy which has been implemented gradually since 2018 in view of its Group-wide deployment in 2019, an alert can be issued, anonymously or not, via email or by phone. It is received by an external service provider that transmits the report in anonymized form to ENGIE for processing. - Managerial notification of ethics incidents is done via a dedicated IT tool ("INFORM'ethics") - Ethics incidents are subject to systematic processing and implementation of corrective and preventive measures - The Compliance Committee assesses the handling of ethical incidents and monitors the process for updating the Group's ethics and compliance framework. - Yearly review of the ethics and compliance mechanisms and of the ethics incidents by the Ethics, Environment & Sustainable Development Committee of ENGIE Board of Directors 	<p><u>Cf. 2019 Integrated Report -"Ethics and compliance" (p.38)</u></p> <p><u>Cf. 2018 Registration Document -"4.2.4. Whistle-blowing and reporting of ethics incidents" (p.168)</u></p> <p>-</p> <p><u>Cf. ENGIE.com : Ethical compliance referential</u> <u>Cf. ENGIE.com : Whistleblowing system</u></p>
<p><u>Audit and internal control:</u></p> <ul style="list-style-type: none"> • <u>A self-evaluation questionnaire dealing with key ethical themes is implemented within the framework of Internal Control. The Group's internal control program ("INCOME") includes control activities that address the requirements of the French Sapin II law and the French law on the duty of vigilance.</u> • <u>Audits are conducted across the field of ethics and compliance policies</u> 	<p><u>Cf. 2019 Integrated Report -"Ethics and compliance" (p.38)</u></p> <p><u>Cf. 2018 Registration Document -"4.2.6. Control and certifications" (p 168)</u></p> <p><u>Cf. ENGIE.com : control system</u></p>



<p><u>Annual Ethics Compliance procedure :</u></p> <ul style="list-style-type: none"> - 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" - A dashboard is used to monitor implementation of the Group's ethics policy (including: distribution of ethics documentation, training, establishment of ethics procedures) <p>The 2017 annual report has been submitted to the General Management Committee and the Ethics, Environment & Sustainable Development Committee of ENGIE Board of Directors.</p>	<p>Cf. 2019 Integrated Report -" Ethics and compliance" (p.38)</p> <p>Cf. 2018 Registration Document -"4.2.6 Control and certifications" (p168)</p> <p>Cf. ENGIE.com : control system</p>
<p><u>External certification:</u></p> <p>The Group is engaged in external audit processes of its ethics and compliance system.</p> <ul style="list-style-type: none"> - The Group anti-corruption system was certified by an external organization in 2015. - In 2018, the Group was awarded ISO 37001 certification in respect of its anti-corruption management systems by an external organization. 	<p>Cf. 2019 Integrated Report -" Ethics and compliance" (p.38)</p> <p>Cf. 2018 Registration Document -"4.2.6 Control and certifications" (p168)</p> <p>Cf ENGIE.com : control system</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"> - To signal for low carbon investments - As one of the best ways to accelerate the transition <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"> - x2 by 2020 the coverage of emissions by carbon pricing regulations - and x2 again the coverage by 2030 <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>http://www.carbonpricingleadership.org/</p> <p>http://www.engie.com/breves/rapport-final-prix-carbone-canfin-mestrallet-royal/</p> <p>http://caringforclimate.org/</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"> - the United Nations Convention Against Corruption (UNCAC – 2003); - 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; - the OECD Guidelines for Multinational Enterprises; - the Principles of the ICC (International Chamber of Commerce); - the Council of Europe's Civil Law and Criminal Law Conventions on Corruption (1999); - 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 	

ENGIE details its contribution to the United Nation SDG for 2030

Cf. 2019 Integrated Report page 57
Cf. ENGIE.com : Contribution to the SDG



A sustainable zero-carbon transition
 For many years now, the development of renewables has been an important growth driver for ENGIE. Thanks to its 2015-2018 transformation program, the Group has repositioned its business model to respond to the demand for both the generation of decarbonized energy that helps combat global warming, and new energy services. The Group also pays particular attention to preserving natural resources and to reducing the impact of its activities on biodiversity.

A competitive zero-carbon transition
 As a leader in the zero-carbon transition, the Group creates the conditions for healthy, sustainable growth. After its strategic repositioning, the Group's operational performance and its organic growth show the robust nature of its model. This sustainable economic development is part of a tradition of transparency and corporate ethics at every level of the Group's operation.

A zero-carbon transition that serves everyone
 Territories are a cornerstone of the zero-carbon transition. From urban heating and cooling systems, green mobility and smart grids to lighting and safety systems, ENGIE offers innovative, bespoke solutions to invent the cities of the future and improve the well-being of their inhabitants. Since access to energy is an integral part of its societal responsibility, ENGIE provides technical or financial support to many projects around the world. The Group also adopts a responsible purchasing approach aimed at promoting ethical management in its supplier relations when managing its supply chain.

A zero-carbon transition that brings people together
 ENGIE's many businesses employ more than 160,000 staff on a daily basis. Their health, their safety at work, their commitment and their career within the Group are priorities that are fundamental to joint success, and are constantly monitored. In addition, stakeholders as a whole are seen as partners in building the Group's sustainable development, and as such are frequently consulted.

A zero-carbon transition for the future
 To support and anticipate profound changes in consumer expectations, the Group takes a global approach to investment, incubation or exchange with local ecosystems. Its experts use innovative technologies and digital solutions to devise new offers, optimize production costs and improve energy performance.

7 AFFORDABLE AND CLEAN ENERGY



Criterion 16 : The COP describes strategic social investments and philanthropy

<p>The Group pays some €6 million a year into the Housing Solidarity Fund (FSL), in accordance with its public service agreement.</p>	<p><u>Cf. 2018 Registration Document - « 3.6.3. Community philanthropy, solidarity and combating energy poverty » (page 102)</u></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><u>Cf. ENGIE.com: ENGIE foundation</u></p>
<p>In 2018-2019, the ENGIE Foundation has financed 117 projects around its two main axes: integration for children and youth and access to sustainable energy and biodiversity. for approximately 485,000 beneficiaries.</p>	<p><u>Cf. ENGIE.com: ENGIE foundation activity report</u></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><u>Cf. 2018 Registration Document: "3.6.2 3 Dialogue with stakeholders and partnership"(page 101)</u> <u>Cf ENGIE.com : ENGIE Volunteers program</u></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. Overview of Rassembleurs d'Energies projects</p>	<p><u>Cf. ENGIE.com: energy access for all</u></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. 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> <ul style="list-style-type: none"> - donations from current employees, allocated through the profit sharing scheme, - donations from former employees, - companies matching employee donations. <p>Additionally, Fape ENGIE receives donations from other individuals and external companies that choose to support its efforts.</p>	<p>http://www.fape-engie.fr/en/</p> <p><u>Cf. 2018 Registration Document: "Inclusion, job-seeking support and social solidarity" page 74</u></p> <p><u>Projects supported by FAPE</u></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>	
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Criterion 17 : The COP describes advocacy and public engagement

<p>ENGIE defended the principle of a global carbon price at the UN Climate Summit in September 2014 in New York.</p>	<p>http://www.engie.com/en/group/opinions/energy-transition-climate/speech-gerard-mestrallet-carbon-pricing/</p>
<p>As a leader in the energy transition, ENGIE recognises the importance of engaging international economic leaders in the climate debate. during the Business and Climate Summit..</p>	<p>http://www.engie.com/en/news/gerard-mestrallet-speech-business-climate-summit/</p>
<p></p>	<p></p>
<p>ENGIE has been a partner and supporter of the New World Forum since 2011.</p>	<p>http://www.engie.com/en/group/opinions/groups-strategy/mestrallets-speech-new-world-forum/</p>
<p>Terrawatt Initiative: At the end of 2015, ENGIE announced the launch of the Terrawatt Initiative, a global non-profit organization 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>Cf. Terrawatt http://www.engie.com/en/news/engie-leads-the-terrawatt-initiative-at-the-united-nations/ http://www.engie.com/en/innovation-energy-transition/isabelle-kocher-solarcop-marrakech-terrawatt-initiative/</p>
<p></p>	<p></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>https://www.engie.com/en/journalists/press-releases/industrial-issuers-26-billion-in-green-bonds-pledge-to-double-down-on-green-financing/ Cf ENGIE.com : Industrial issuers of €26 billion in Green bonds pledge to double down on green financing</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>https://www.fsb-tcf.org/wp-content/uploads/2017/06/TCFD-Supporting-Companies-28-June-2017-FINAL.pdf Cf. 2019 Integrated Report p 41 : TCFD: ENGIE is committed to better integration of climate risks Cf. ENGIE.com : Standards of CSR reporting</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><u>Cf. 2019 Integrated Report : "Our commitments" pages 28-29</u></p>
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III. CSR corporate governance and leadership

Criterion 19 : The COP describes CEO commitment and leadership

<p>ENGIE supports the Global Compact</p>	<p><u>Cf. ENGIE.com : ENGIE supports the Global Compact</u></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><u>Cf. ENGIE.com: Governance- Board Committees</u> <u>Cf. ENGIE.com: CSR governance</u></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 2018, with an average attendance rate of 95%.</p>	<p><u>Cf. 2019 Integrated Report "Significant involvement of the Board and its Committees in 2018" page 32:</u> <u>Cf. 2018 Registration Document : "The Ethics, Environment and Sustainable Development Committee" page 138</u></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 2018 is 53%.</p>	<p><u>Cf. 2019 Integrated Report : Our commitments p 28:</u> <u>Cf. ENGIE.com: Societal</u></p>
<p>In 2017, ENGIE updated its materiality matrix by launching a consultation that mobilized a hundred internal and external people.</p>	<p><u>Cf. 2019 Integrated Report : "A zero- carbon transition that benefits all our stakeholders" pages 42-43</u> <u>Cf. ENGIE.com: materiality matrix</u></p>