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Reporting – Global Compact Principle 10

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ANTI-CORRUPTION

PRINCIPLE 10

With regard to ethics, ENGIE’s goal is to act in accordance with its values and commitments, always and everywhere, observing all applicable laws and regulations in force.

Fighting corruption is one of the Group’s major commitments, reflected in its organization and modes of governance. ENGIE policy is based on the principle of maintaining a culture of integrity, trust and honesty, including a zero tolerance policy on fraud and corruption, both inside and outside the company when it deals with third parties.

In 2012 the Group started reporting on the 10th principle against corruption for the Global Compact which comprises about 22 indicators. The reporting is made in accordance with the guidelines provided by UNGC and Transparency International.

N°	Actions	Basic Reporting Element	Desired Reporting Element
1.	Commitment and policy	B1-B2	D1-D5
2.	Implementation	B3-B6	D6-D11
3.	Monitoring	B7	D12-D15

This action is part of a broader program of voluntary initiatives taken by the Group to contribute improving integrity, as ENGIE is committed to developing the highest standards of ethics and transparency and supports multilateral international initiatives to fight corruption.

“Behave honestly and promote a culture of integrity” is one of the 4 fundamental ethical principles guiding ENGIE, according to the Group [Ethics charter](#), updated in 2016, published in 20 languages and distributed to all Group employees.

ENGIE, which employs around 160,000 people, understands the need for inviolable ethics rules, the respect for integrity, and for adequate means of continuously raising the awareness of every employee on ethics.

Agenda

Executive summary	4
1. Commitment and policy	7
B1-Publicly stated commitments to work against corruption in all its forms, including bribery and extortion	7
B2-Commitment to be in compliance with all relevant laws, including anti-corruption laws.....	9
D1-Publicly stated formal policy of zero tolerance of corruption	9
D2-Statement of support for international and regional legal frameworks.....	9
D3-Carrying out risk assessment of potential areas of corruption.....	10
D4-Detailed policies for high risk areas of corruption	10
D5-Policy on anti-corruption regarding business partners.....	11
2. Implementation	13
B3-Translation of an anti-corruption commitment into actions	13
B4-Support by the organization’s leadership for anti-corruption	15
B5-Communication and training on the anti-corruption commitment for all employees	15
B6-Internal checks and balances to ensure consistency with the anti-corruption commitment.....	16
D6-Actions taken to encourage business partners to implement an anti-corruption commitment	17
D7-Management responsibility and accountability for implementation of the anti-corruption commitment or policy	18
D8-Human Resources procedures supporting the anti-corruption commitment or policy	18
D9-Communications (whistle blowing) channels and follow-up mechanisms for reporting concerns or seeking advice	18
D10-Internal accounting and auditing procedures related to anti-corruption	19
D11-Participation in voluntary anti-corruption initiatives	19
3. Monitoring	20
B7-Monitoring and improvement processes.....	20
D12-Annual Compliance Procedure	21
D13-Dealing with incidents	21
D14-Public legal cases regarding corruption.....	22
D15-Use of independent external assurance of anti-corruption programs	22

Executive summary

ENGIE is implementing a program to fight against corruption, which incorporates best international standards: UK Bribery Act, US Foreign Corrupt Practices Act (FCPA), and French Sapin II law.

A commitment at the highest Group level

- *The Group's executives, particularly the Chairman, the CEO and the Executive Committee, drive and supervise ENGIE's ethics policy and ensure its effective implementation, in particular through the Compliance Committee.*
- *A strong zero tolerance approach to ethics is part of the ethical referentials and is regularly expressed by the CEO:*

"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 recognised 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 is placed on us, by making ethics an absolute priority every day."

Isabelle KOCHER, CEO, November 2016, introduction of ENGIE [Ethics charter](#).

- *The Group's external commitments are made with organisations like Global Compact and Transparency International France, and required of all our suppliers, service providers, subcontractors and partners.*

Risk assessment

- *An assessment of ethical risks that takes into account the specific characteristics of ENGIE's activities is integrated into the Group's risk analysis process (annual ERM process). 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. The results of the ethics risk analysis are presented to the Group's Executive Committee and to the Ethics, Environment and Sustainable Development Committee of ENGIE Board of Directors.*

Establishing an anti-corruption compliance program

- *A dedicated organisation supervised by the Ethics, Environment and Sustainable Development Committee of ENGIE Board of Directors, has been established.*
- *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 organisations. It heads up the Ethics & Compliance network, which consists of over 300 persons.*
- *Responsibilities are defined at all levels of the managerial line.*
- *The Group's [Ethics charter](#) together with the [Practical guide to ethics](#) are the reference documents regarding ethics and compliance. They forbid bribery and corruption in all forms. They are distributed to all new employees who commit to respect the ethics principles. They are available via the ethics, compliance & privacy portal of the Group's internet website (<https://www.engie.com/en/ethics-compliance/>) and via the Group's intranet.*

- *Specific policies are implemented as part of the integrity referential relating to:*
 - *Due Diligence: the Group has adopted several ethical due diligence policies regarding:*
 - *Business consultants*
 - *Investment project partners*
 - *Recipients of corporate sponsorship and patronage*
 - *Suppliers and direct sub-contractors*
 - *Gifts and hospitality*
 - *Prevention of conflicts of interests*
 - *the integration of an ethical, health & safety, social & environmental responsibility clause into contracts with the Group's suppliers, service providers, subcontractors and partners*
- *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.*
- *The Group has developed various codes of conduct in order to apply the commitments outlined in ENGIE's [Ethics charter](#) to each of its activities and professional practices, and especially regarding relations with suppliers and lobbying activities.*
- *With regard to interest representation, the Group has set up in 2017 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.*
- *Ethics is integrated into the annual appraisal process of management and employees.*
- *A whistleblowing system is open to Group employees and to all external third parties (customers, suppliers, etc.). In 2017 the Group set a new policy on whistleblowers 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").*
- *The Guidelines for managing early warning signs in the field of ethics and compliance, issued in the Group in 2018, formalize ENGIE's commitment to prevent and detect ethical incidents as early as possible through early warning signals called "early warning signs".*
- *Ethics incidents are subject to systematic processing and implementation of corrective and preventive measures.*

Communication, manager training and employee awareness

- *The Ethics & Compliance Convention (last meeting: April 2016) mobilizes the ethics & compliance officers and ethics correspondents network and Group managers. It provides an opportunity to reaffirm the Group's ethical commitments and to support entities in the implementation of policies, procedures and continuous improvement of ethics practices.*
- *The Group Ethics, Compliance & Privacy Department organizes web conferences, where appropriate in conjunction with other Group departments, open to all members of the Ethics and Compliance network as well as to members of other Group functions particularly concerned with the topics, to present in particular new policies and tools in support of their application, innovations in key processes, as well as significant legislative developments in the field of ethics and compliance.*
- *The Group carries out a series of awareness-raising and training activities including: a mandatory awareness seminar about the risk of fraud and corruption for senior executives, for members of Business Unit's (BU's) general management committees and for members of the ethics & compliance network, and specific training for ethics & compliance officers, for managers and for the procurement line.*

- *Ethics awareness sessions via e-learning and scribings are accessible to all employees.*

Control system

- *A self-evaluation questionnaire dealing with key ethical themes has been implemented within the framework of Internal Control.*
- *The roll-out and implementation of the anti-bribery system within the Group's entities is followed up through an annual ethics compliance procedure which is implemented via the Group tool "REPORT'ethics".*
- *Audits are conducted across the field of ethics and compliance policies.*
- *The Group is also engaged in external audit processes of its ethics and compliance system. In 2015 the Group anti-corruption system was awarded certification by Mazars, an accounting and auditing firm, and ADIT, a business intelligence firm. In 2018, the Group was awarded ISO 37001 certification in respect of its anti-corruption management systems by ETHIC Intelligence.*

1. Commitment and policy

B1-Publicly stated commitments to work against corruption in all its forms, including bribery and extortion

ENGIE shares its culture of integrity and compliance with its commitment to bar any act of corruption (which is translated in a zero tolerance policy on fraud and corruption), in particular by corporate communications.

This commitment is publicly stated in statements made by the CEO and the Board of Directors. It is also illustrated by voluntary initiatives and memberships of the Group.

1. Publicly stated commitment and declarations

The culture of integrity, zero tolerance approach towards corruption and the Group's commitment to work against corruption are presented and detailed in ENGIE public reference documents:

- The ENGIE's annual registration document
- The ENGIE's annual integrated report
- [Ethics charter](#) (updated in 2016)
- [Practical guide to ethics](#) (updated in 2016)
- The Global Agreement on fundamental rights, social dialogue and sustainable development signed with Trade Unions
- The "Ethics of Business Relationships: Governing Principles", with a section fully dedicated to principles to gifts and hospitality
- The Global Compact Communication on Progress and specific report about the 10th principle

- The [Code of conduct on lobbying](#)
- [The Code of conduct in supplier relations](#)

These documents are available via the ethics, compliance & privacy portal of the Group's internet website (<https://www.engie.com/en/ethics-compliance/>) and via the Group's intranet.

The distribution of the updated [Ethics charter](#) to all employees in December 2016 was an opportunity for Isabelle KOCHER, ENGIE's CEO, to reaffirm the Group's ethics commitments:

"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 recognised 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](#)

ENGIE's [Ethics charter](#), translated into 20 languages and sent to all Group's employees, includes the section "**Behave honestly and promote a culture of integrity**" (page 4):

"Honesty and integrity must govern both business and interpersonal relationships, and everyday professional practices. It is essential for every individual to act in an upright manner in all circumstances, and promote a culture of honesty and integrity. Based on this principle, the Group attaches the utmost importance to exemplary behaviour from its employees. In choosing its partners, ENGIE is careful to maintain high requirements regarding honesty and respect for human rights. As a consequence, ENGIE encourages reporting of ethical incidents, and no employee may be sanctioned neither for using a

reporting measure for these incidents, selflessly and in good faith, nor for refusing to carry out an act which they believe goes against the Group's ethical principles."

The [Practical guide to ethics](#) includes the following (page 4):

"ENGIE upholds the highest ethical standards. ENGIE's principles of action are rooted in international benchmark texts, in particular:

- The Universal Declaration of Human Rights and Additional Protocols
- The conventions of the International Labor Organization (ILO), and the Guidelines of the Organization for Economic Co-Operation and Development (OECD) for multinational enterprises
- The United Nations Convention against Corruption."

The **Global Agreement on fundamental rights, social dialogue and sustainable development**, signed in 2011, applies to all the Group entities worldwide. It includes the following ethics principle: "the maintenance of a culture of integrity, trust and honesty, including a zero tolerance policy on fraud and corruption, inside the company as well as with others".

The "**Ethics of Business Relationships: Governing Principles**" aims at:

- ensuring that business relationships with all external stakeholders (customers, public authorities, competitors, suppliers, commercial partners, and corporate patronage and sponsorships partners, etc.) are subject to high ethical standards
- adapting our principles to make sure that they are compliant with applicable laws in the sensitive areas of business relationships, and to make them enforceable
- increasing our customer satisfaction and service quality, as well as ensuring relevant standards for the protection of local populations
- protecting the Group's reputation

The **Group Integrity Referential** is published on ENGIE's [internet website](#):

"Integrity is one of the four principles on which ENGIE has based its ethics and compliance policy."

All public elements on ENGIE's ethics and compliance commitments, and in particular in the fight against corruption, are available via its website at: <http://www.engie.com/en/group/ethics-compliance/>

2. Voluntary initiatives and memberships for working against corruption

ENGIE has chosen to support multilateral initiatives from international organizations to fight corruption. The Group believes that a global framework is needed in order to combat global corruption. In this respect, the Group's initiatives and memberships are listed below:

- In 2009, ENGIE, at the invitation of the International Chamber of Commerce, Transparency International, The United Nations Global Compact, and the World Economic Forum Partnering Against Corruption Initiative (PACI), signed a **Letter to support the United Nation Convention against Corruption (UNCAC)**.
- ENGIE committed to the United Nations Global Compact (UNGC) since 2000, chose in 2011 to complete the **specific report on the 10th principle against corruption** (by reporting on 22 points); ENGIE's then President and Chief Executive officer Gérard Mestrallet chaired the French Network of the Global Compact between 2007 and 2013.
- ENGIE supports the OCDE initiative against corruption.
- ENGIE is a member of

Transparency International, French section, a non-profit organization that fights corruption.

B2-Commitment to be in compliance with all relevant laws, including anti-corruption laws

“Acting in accordance with laws and regulations” is the first of the Group’s 4 fundamental ethics principles, published in the [Ethics charter](#). According to this principle: “in all circumstances, all Group employees must observe international, federal, national, local regulations, as well as rules of professional ethics for their activities, and the Group’s ethics and compliance policies.” (page 4).

This commitment is regularly reiterated in public statements at the highest level of the Group’s management as well as in the company’s annual reports, published on the Group’s internet website.

Business partners and stakeholders can take note of the following statement on the Group’s [internet website](#): “In line with its values and commitments, ENGIE seeks to act in all circumstances in accordance with the laws and regulations in force in the countries where it operates. To protect its values and commitments, the Group has implemented an ethics Policy that underpins everyday strategic decisions, management, and professional practices for all Group Employees.”

Since 2016, the Group Ethics, Compliance & Privacy Department expanded its missions to legal counsel and control, and since 2018, it 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.

D1-Publicly stated formal policy of zero tolerance of corruption

The Global Agreement on fundamental rights, social dialogue and sustainable development signed in 2011 applies to all ENGIE entities worldwide. The ethics principles of the Agreement include: “the maintenance of a culture of integrity, trust and honesty, including a zero tolerance policy on fraud and corruption, inside and outside the company (when dealing with third parties)”.

The position of principle on zero tolerance against corruption is clearly detailed in the [Practical guide to ethics](#): “ENGIE condemns all forms of influence peddling and corruption” (p.11). It is published on ENGIE’s [internet website](#): “A strong message of zero tolerance with respect to ethics – especially in the fight against fraud and corruption – runs throughout the Group’s ethics and compliance framework. This message is regularly communicated by the Group’s Presidency and passed on by managers at all Group levels.”

In order to give employees and business partners a full understanding of the Group’s position against corruption as well as of procedures, the ENGIE Ethics, Compliance & Privacy Department published a specific anti-corruption program approved by the Executive Committee in 2010 and updated end 2017, the **Integrity Referential**.

This Integrity Referential is published on the Group’s intranet site, and distributed to the ENGIE Ethics & Compliance line for implementation in entities worldwide. It is also published on the corporate [internet website](#), in order to be consulted by business partners and stakeholders.

The Group has also established business guidelines presented on its website, describing principles about integrity in business relationships regarding especially ethical due diligence regarding 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; the integration of an ethical, health & safety, social & environmental responsibility clause into contracts with the Group’s suppliers, service providers, subcontractors and partners; lobbying activities and supplier relations.

D2-Statement of support for international and regional legal frameworks

ENGIE aligns itself with the global anti-corruption movement across industries and multilateral

organizations, as well as with international and regional legal frameworks, to contribute to the promotion of level playing-fields within industries.

ENGIE's principles of action are rooted in the international reference models mentioned below, for which statements of support have been made.

ENGIE supports the following multilateral initiatives, and international and regional legal frameworks:

- The United Nations Convention against corruption, UNCAC (2003)
- The 1997 OECD "Convention on combating bribery of foreign public officials in international business transactions", ratified in France in 2000
- The Guidelines for Multinational Enterprises laid down by the Organization for Economic Co-Operation and Development
- ICC (International Chamber of Commerce) Principles
- The Council of Europe's Civil Law and Criminal law Conventions on corruption (1999)
- The French Law of November 13, 2007, the Bribery Act, the FCPA, Sarbane Oxley, Dodd Frank Act, the Sapin II French law etc.

D3-Carrying out risk assessment of potential areas of corruption

ENGIE is conscious that Gas, Energy and Public Services sectors are internationally considered as being at greater risk of exposure to corruption. Equally, companies of all sectors involved in public procurement contracts in some countries of the world are also considered as being in situation of greater risk.

To implement its ethics policy and anti-corruption policy, the Group carries out ethics risk assessment through its annual ERM (Enterprise Risk Management) Process, and before concluding contracts that fall under the scope of ENGIE's Commitment Committee, business consultants' contracts, patronage/sponsorships contracts and contracts with suppliers and direct sub-contractors.

The process for assessing the corruption risk includes a methodology common to all Group entities, based on dedicated check-list.

The Group uses tools such as Maplecroft in order to evaluate the level of the risk of corruption in the countries in which it operates or wants to develop.

Since 2011, the level of corruption and non-respect of human rights in countries are integrated in the measurement of country risks for the Group.

D4-Detailed policies for high risk areas of corruption

Some professional activities, relationships with specific business partners, business areas, and other situations can be conducive to the risk of corruption, such as: selection process of and relationships with suppliers, the use of business consultants, patronage/sponsorship deals, gifts and hospitality,

Presented on the Group's [internet](#) and intranet websites, the following policies, taking into account the best practices of the international framework such as the US Foreign Corrupt Practices Act ("FCPA"), the UK Bribery Act and the Sapin II French law, have been adopted:

- The Business Consultants policy, in force since January 1st 2013, deals with Business Consultants and aims at monitoring the risk of corruption linked to the use of business consultants. Its key elements include: an ethical due diligence of all business consultants, the analysis of the business rationale of their missions, a framework governing compensation, traceability of selection decisions and services provided.
- "[Ethics for Business Relationship: Governing Principles](#)" aims in particular at monitoring the risk of corruption in the context of gifts and hospitality. Gift and Hospitalities policies have been

progressively implemented since January 2013 in all Group entities.

- The Group has put in place a policy on analysis of the ethical risk related to investment projects in 2015. This policy was 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. Within the framework of this policy, every partner in every project that comes before the commitments committee is subject to a due diligence procedure. The intensity of the due diligence measures to be taken, varies with the level of exposure to the ethics and compliance risk facing the BU or the Group for which the project must be carried out.
- Since 2016, ENGIE refuses to partake in any financing of political activity, including in countries where this is authorised and regulated by the law: “ENGIE refuses to partake in any financing of political activity, including in countries where this is authorised and regulated by the law” ([Practical guide to ethics](#), p.11). The Group’s refusal to engage in political activity financing is repeated in the Code of conduct on lobbying (page 2).
- The Group has from November 2016 a policy for the prevention of conflict of interests, which aims to eliminate any doubts concerning the impartiality of a decision taken by a Group employee or his or her potential lack of loyalty in taking a decision. This policy informs employees and guides them if facing such situation: it gives them examples of situations, and specifies the process for management and traceability in this matter.
- ENGIE has a [Code of conduct on lobbying](#) since March 2017. This code provides a framework for the Group’s lobbying activity by outlining commitments to promote ENGIE while continuing to favour the public interest. It aims to improve the transparency of lobbying activities and to confirm the Group’s integrity standards for these activities. It is applicable to all lobbyists working on behalf of the Group, including Group employees and representatives.
- With regard to interest representation, the Group has set up in August 2017 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.
- As regards patronage and sponsorships, the Group issued in June 2018 a dedicated due diligence policy which addresses the requirements of the French Sapin II law and the French law on the duty of vigilance.
- The due diligence policy for suppliers and direct sub-contractors, issued in November 2018, covers the due diligence required for future suppliers and sub-contractors in the light of the requirements of the French Sapin II law and the French law on the duty of vigilance.
- In 2016, 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.

D5–Policy on anti-corruption regarding business partners

ENGIE raises awareness of its public and private partners so that the Group’s anti-corruption principles are known and respected.

According to the [Ethics charter](#) (page 7), available via the Group’s intranet and internet website: “ENGIE’s employees (...) ensure that the ethical concerns of partners, suppliers, service providers and subcontractors are compatible with those of the Group, and bring ENGIE’s [Ethics charter](#) to their attention.”

1. Relationship with suppliers

The [Code of conduct in supplier relations](#), distributed to all Group entities, is available via the internet

website www.engie.com. It requires employees to disseminate ethical principles and to screen suppliers on ethical principles such as anti-corruption and human rights.

This code, issued in 2016, applies to all employees having business relationships with suppliers, service providers, subcontractors or partners. It has been updated in 2019.

Since 2014, an [ethical, health & safety, social & environmental responsibility clause](#), targeting the implementation of these ethics principles, is integrated in contracts with suppliers, and also in all contracts with service providers, subcontractors and partners since 2015. 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.

2. Business Consultants

Principles presented in the [Practical guide to ethics](#), in the document “Ethics of Business Relationships: Governing Principles”, the Group’s internet website and in the business consultants policy (in force since 2013), are applied wherever the Group operates.

The business consultants policy has 4 objectives:

1. to submit all business consultants considered for appointment to a prior due diligence process
2. to analyze the business rationale of the business consultants’ missions
3. to strictly monitor the remunerations paid
4. to ensure traceability of the entire selection process and the adequacy between fees and effective services.

3. Partners in investment projects

The Group has developed a specific policy of analysis of the ethical risk related to investment projects in 2015. It was 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. According to this policy all partners to all projects presented to the commitments committee are subject to a due diligence procedure adapted to the level of exposure to the ethics and compliance risk facing the BU or the Group for which the project must be carried out.

4. Beneficiaries of patronage and sponsorships

The Group issued in 2018 a due diligence policy regarding patronage and sponsorships. This policy institutes a risk-based due diligence process and requires that each patronage and sponsorship contract includes the [Group’s ethical, health & safety, social & environmental responsibility clause](#).

5. Suppliers and direct sub-contractors

The Group issued in 2018 a due diligence policy for suppliers and direct sub-contractors. The policy covers the due diligence required for future suppliers and sub-contractors in the light of the requirements of the French Sapin II law and the French law on the duty of vigilance. It sets out the rules, framework, scope and means for conducting such due diligence.

6. Public-sector partners

ENGIE has a Code of conduct on lobbying since March 2017. This code provides a framework for the

Group's lobbying activity by outlining commitments to promote ENGIE while continuing to favour the public interest. It aims to improve the transparency of lobbying activities and to confirm the Group's integrity standards for these activities. It is applicable to all lobbyists working on behalf of the Group, including Group employees and representatives.

With regard to interest representation, the Group has set up in August 2017 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.

2. Implementation

B3-Translation of an anti-corruption commitment into actions

ENGIE has identified corruption risks within the Group's operations, developed detailed policies and procedures, appointed management and built an organization to implement, monitor and continuously improve on fight against corruption.

The areas particularly conducive to fraud and corruption are catalogued and illustrated in the [Practical guide to ethics](#), which provides key information needed to understand the topic, and issues relating to specific professional practices, whether associated with a particular business (for example: lobbyist) or with cross-discipline activities such as relationship with suppliers, or with sensitive fields such as the use of business consultants.

ENGIE is implementing a scheme to fight against corruption taking into account principles of the best international standards such as those of the UK Bribery Act, the US Foreign Corrupt Practices Act (FCPA) and the French Sapin II law.

1. Establishing an anti-corruption compliance program

A dedicated **organisation** supervised by the Ethics, Environment and Sustainable Development Committee of ENGIE Board of Directors, has been established.

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. It heads the Ethics & Compliance network, bringing together all the ethics and compliance officers and ethics correspondents from the Group's entities, i.e. more than 300 persons. 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.

Responsibilities are defined at all levels of the managerial line. The Group's delegations of authority and engagement letters include a specific reference to ethical responsibilities.

The Group's [Ethics charter](#) and the [Practical guide to ethics](#), Group's ethics and compliance reference documents, forbid bribery and corruption in all forms. They are distributed to all new employees who commit to respect the ethics principles. They are available via the internet site (ethics, compliance & privacy portal's welcome page: <https://www.engie.com/en/ethics-compliance/>) and via the Group's intranet website.

Specific policies as part of the [integrity referential](#) are implemented relating to:

- Due diligence: the Group has adopted several ethical due diligence policies regarding:
 - business consultants
 - investment project partners
 - recipients of corporate sponsorship and patronage
 - suppliers and direct sub-contractors
- gifts and hospitality
- prevention of conflict of interests
- the integration of an [ethical, health & safety, social & environmental responsibility clause](#) into contracts with the Group's suppliers, service providers, subcontractors and partners (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).

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.

The Group has developed various **codes of conduct** in order to apply the commitments outlined in ENGIE’s Ethics charter to each of its activities and professional practices, and especially regarding relations with suppliers and lobbying activities (see [Code of conduct in supplier relations](#) and [Code of conduct on lobbying](#)).

With regard to **interest representation**, the Group has set up a reporting procedure in 2017 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.

Ethics is integrated into the **annual appraisal process of management and employees**.

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 whistleblowers 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. The Group’s whistleblowing system is presented in detail on the Group’s internet website.

Managerial notification of ethics incidents is done via a dedicated IT tool (INFORM'ethics).

Guidelines for managing **early warning signs** in the field of ethics and compliance were issued in the Group in 2018. They formalize ENGIE's commitment to prevent and detect ethical incidents as early as possible through early warning signals called “early warning signs”.

Ethics incidents are subject to systematic processing and implementation of corrective and preventive measures.

2. Communication, manager training and employee awareness

The Ethics & Compliance Convention mobilizes the ethics and compliance network and Group top managers. It provides an opportunity to reaffirm the Group's ethical commitments and to support entities for the implementation of policies and procedures and the continuous improvement of the ethics practices.

The Group Ethics, Compliance & Privacy Department organizes web conferences, where appropriate in conjunction with other Group departments, open to all members of the Ethics and Compliance network as well as to members of other Group functions particularly concerned with the topics, to present in particular new policies and tools in support of their application, innovations in key

processes, as well as significant legislative developments in the field of ethics and compliance.

The Group carries out a series of awareness-raising and training activities including a mandatory awareness-raising seminar about the risk of fraud and corruption for senior executives, for members of BU's general management committees and for members of the ethics and compliance network, specific training for ethics officers and the procurement line.

Ethics and compliance training is available for all Group employees via e-learning modules and scribings.

B4-Support by the organization's leadership for anti-corruption

Leadership's messages and commitments, as well as support to collaborators' actions regarding integrity, are on the Group's intranet website.

The governance system involves the entire Group managerial chain. It is organised as follows:

- A dedicated organisation supervised by the Ethics, Environment and Sustainable Development Committee of ENGIE Board of Directors, has been established.
- 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. It conducts the Ethics & Compliance network, bringing together all the ethics and compliance officers and ethics correspondents from the Group's entities, i.e. more than 300 persons.
- Responsibilities are defined at all levels of the managerial line. The Group's delegations of authority and engagement letters include a specific reference to ethical responsibilities.
- The Group managers are the first guarantors of the application of ethics. They must have the tools necessary to deploy the Group's ethics principles and detect any violation of these rules and establish a system to control the application of the ethics and compliance systems.
- Each year, the BU Managers address a letter of compliance certifying their commitment to the application of the ethical and compliance system within their BU accompanied by a report prepared by the ethics and compliance officer, to the Group CEO.

ENGIE implemented a new organisation since January 1st, 2016. This transformation was the opportunity to reaffirm ethics commitments, in particular regarding anti-corruption. The Ethics, Compliance & Privacy Department has been strengthened, both regarding staffing and missions, and is now leading an authoritative line. 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.

B5-Communication and training on the anti-corruption commitment for all employees

All the documents and publications about integrity (such as the referential, guidelines, ...) are available via the Group's internet site (ethics, compliance & privacy portal's welcome page: <https://www.engie.com/en/ethics-compliance/>) and the intranet which is accessible for every Group entity.

In compliance with the principles set forth in the US Federal Corrupt Practices Act and the UK Bribery Act, ENGIE conducts a number of actions in terms of raising awareness and training, amongst which:

- A specialized and mandatory training (“**Understanding and anticipating the risk of fraud and corruption**”) launched in 2012 and designed for ENGIE senior executives. End of 2018, 91% of ENGIE’s senior executives attended the seminar. Since 2016, this training is also mandatory for members of BU’s general management committees and for members of the ethics and compliance network. It is strongly recommended to business developers.
- A training seminar on “**Business Ethics**” dedicated to managers has been launched in 2009. This seminar aims at discussing the various aspects of being ethical in the decision making process and the management of a company, monitoring and mitigating the risk of fraud and corruption. Since 2017, this training, currently named “**Ethics & Compliance at ENGIE**” has been made available to Ethics & Compliance officers at NewCorp, in BUs and in entities, so that they can provide it to those they consider as the most exposed, including to corruption and influence peddling risks, focusing on the most appropriate topics depending on the audience.
- The training seminar dedicated to the **purchasing line**, launched in 2014, has been updated in 2016. It is targeted at all the members of the purchasing line and discusses ethics issues (including fraud and corruption) in the supply and purchase chain.
- **Several e-learning training modules**, focusing on various ethics issues are accessible to all Group employees. In 2018, 6 of the 7 modules made available in the Group were replaced by modernised modules as regards their digital access and updated as regards their content. These modules, some of which are mandatory (for all employees; for members of personnel particularly exposed to corruption risks; for the members of the ethics & compliance network), discuss amongst others the following topics:
 - Module : “Our Group, our ethics”, including amongst others the following themes: ethics, employees’ role in relation to ethics, corruption, conflicts of interests (launched in 2018; available in 6 languages; BUs/entities have the possibility to translate the modules in other languages)
 - Module “Fraud and corruption: zero tolerance”, including detailed information on fraud and corruption: definition, how to prevent fraud and corruption, ENGIE’s policies and procedures (launched in 2018; available in 6 languages; BUs/entities have the possibility to translate the modules in other languages)
- **Video scribing**, specific & periodic awareness-raising tools, making it possible to recall the Group’s commitments and to anchor the reflexes to be adopted in the event of an ethical dilemma on various themes, are accessible for all of the Group’s employees (topics covered include: whistleblowing, gifts and hospitality, corruption, conflicts of interests).

Moreover, thematic webinars are regularly organised in the course of the year to support ethics and compliance officers in the implementation of the Group ethics and compliance policies and procedures. These webinars are mandatory for the members of the ethics & compliance network.

The Group Ethics, Compliance & Privacy Department also organizes web conferences, where appropriate in conjunction with other Group departments, open to all members of the Ethics and Compliance network as well as to members of other Group functions particularly concerned with the topics, to present in particular new policies and tools in support of their application, innovations in key processes, as well as significant legislative developments in the field of ethics and compliance.

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

The implementation of the various policies is evaluated through the internal control system and the audits in all Group’s entities [see B7].

The Group is also engaged in external audit processes of its ethics and compliance system. In 2015 the Group anti-corruption system was awarded certification by Mazars, an accounting and auditing firm, and ADIT, a business intelligence firm. In 2018, the Group was awarded ISO 37001 certification in respect of its anti-corruption management systems by ETHIC Intelligence.

D6-Actions taken to encourage business partners to implement an anti-corruption commitment

ENGIE business partners are: customers, joint-venture partners, suppliers, external service providers, business consultants, lobbyists, partner companies in public initiatives, public officers, etc.

Special attention is paid to the relationship with suppliers and business consultants: policies, codes of conduct, action plans, and tools aimed at preventing incidents with these business partners are implemented.

All entities are required to use an [ethical, health & safety, social & environmental responsibility clause](#) in contracts with suppliers, service providers, subcontractors and partners, which states that suppliers must proscribe any form of corruption whatsoever during the performance of the contract and undertake to ensure the respect and application of rules by their principal subcontractors and/or suppliers. 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.

ENGIE requires its commercial partners, subcontractors and suppliers to establish their own ethical, environmental and social rules, if they have not already done so, and to maintain practices that are compatible with the Group’s values, in particular regarding fight against corruption and respect of human rights.

Since 2012, the Group decided to ensure consistency with the anti-corruption commitment in the sensitive field of business consultants. The inherent risk of using the services of a business consultant must be assessed by a mandatory due diligence, taking into account his/her reputation, technical, financial and commercial references, clean criminal record and professionalism.

The Group has developed since 2015 a specific policy on the analysis of the ethical risk related to investment projects, under which all stakeholders in its investment projects are subject to a due diligence procedure adapted to the risk profile. This policy was 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.

As regards patronage and sponsorships, the Group issued in June 2018 a dedicated due diligence policy which addresses the requirements of the French Sapin II law and the French law on the duty of vigilance.

A due diligence policy for suppliers and direct sub-contractors, covering the due diligence required for future suppliers and sub-contractors in the light of the requirements of the French Sapin II law and the French law on the duty of vigilance, was issued in November 2018. 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.

As regards lobbying activities, ENGIE’s Code of conduct on lobbying (March 2017) provides a framework for the Group’s lobbying activity by outlining commitments to promote ENGIE while continuing to favour the public interest. It requires that every ENGIE lobbyist commits to perform its lobbying activities in accordance with ENGIE’s fundamental ethics principles.

With regard to interest representation, the Group has set up in 2017 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.

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

ENGIE identifies directors and managers as the primary promoters of the Group's [Ethics charter](#) and its everyday application towards employees and stakeholders (see [Ethics charter](#) and [Practical guide to ethics](#)).

Tools for implementing this strategy include training sessions about anti-corruption at Group and entities levels. A specific dedicated Group training is mandatory for senior executives, members of BU's general management committees, members of the ethics and compliance network, and strongly recommended to business developers.

The Group's delegations of authority and engagement letters include a specific reference to ethical responsibilities.

Senior executives and managers are involved by including ethics in their annual appraisal process.

ENGIE's annual Compliance Procedure [see D12] requires compliance and commitment letters from the top management of each entity regarding their perimeter.

D8-Human Resources procedures supporting the anti-corruption commitment or policy

Human Resources develop the ethics and anti-corruption policy in their own HR policies and procedures:

- The [Ethics charter](#) and the [Practical guide to ethics](#) are distributed to all new arrivals to Group entities, and since the end of 2014, the handing over of the reference documents is coupled with ensuring that employees are aware of these principles and are committed to following them.
- The Human Resources reference document on behaviour in the company ("Leadership Deal") formally includes two points concerning ethics and integrity as required behaviour for managers:
 - o Promoting integrity and trust
 - o Display the behaviors linked to the ENGIE values and leadership dimensions
- Since the end of 2014, the Group requires the inclusion of ethics in the annual appraisal process for senior executives to be extended to all Group employees. This involves on one hand ensuring that all employees are aware of the Group's ethical principles, and on the other hand, creating a compulsory discussion between employees and their managers on how ethical practices have been implemented in day-to-day business.
- The Group has updated its policy on the incorporation of ethics in HR processes in May 2017. This document reiterates and details the Group's ethics requirements for Human Resources processes: recruitment, welcoming newcomers, managing sensitive positions, training, annual employee appraisal, leaving a position, whistleblowing, sanctions. This policy applies to all Group employees involved in a HR process.

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

ENGIE has put in place a whistleblowing system that is open to all employees and all external stakeholders (client, supplier, etc.) to report (suspected) ethical violations in confidence. In 2017 the Group set a new policy on whistleblowers 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. The system is placed under the responsibility of the Group Ethics, Compliance & Privacy Director. It is presented in detail to external Group stakeholders on ENGIE's internet [website](#), and

to employees on the Group intranet website.

What to do in case of presumed breaches of ethics rules is also presented in:

- The [Ethics charter](#): “As a consequence, ENGIE encourages reporting of ethical incidents, and no employee may be sanctioned neither for using a reporting measure for these incidents, selflessly and in good faith, nor for refusing to carry out an act which they believe goes against the Group’s ethical principles.” (page 4)
- The [Practical guide to ethics](#): “Reporting of ethics incidents helps to prevent and remedy breaches. It is encouraged by the Group, which provides the necessary procedures and ensures that no sanction of any kind can be brought by the Group against an employee who has, in good faith and selflessly, used a procedure to report ethical incidents.” (page 5).

“Any employee or any Group who has been a victim or witness of unethical practices is invited to report to the managerial staff or ethics & compliance officer of the entity in question, or to the Group Ethics, Compliance & Privacy Director. ENGIE also has an email address for use by all its employees and stakeholders ethics@engie.com: they can use it to inform the Group if they suspect any breach of the ethics and compliance rules.” (page 14)

The principle of protection for whistleblowers is also set out in the [Practical Guide to Ethics](#) (page 14): “A person expressing in good faith and selflessly their ethical or compliance concerns cannot have any measures brought against them for expressing this concern. The identity of the whistleblower and the identity of those possibly implicated remain confidential, and breaking confidentiality may lead to sanctions. Any abusive use of the reporting mechanisms can, however, result in proceedings (e.g. defamation, etc.).”

Some Group entities developed similar tools at their level, in particular in the United-Kingdom, in the United States and in Brazil.

D10-Internal accounting and auditing procedures related to anti-corruption

Ethics and compliance is included in the Group audit program, which includes specific items concerning corruption.

Internal Audits are carried out annually on implementation of ethics policies.

The Internal Control Department (INCOME procedure) participates in the implementation of the Group’s ethics and compliance policy by integrating mandatory points of control in the Group referential.

D11-Participation in voluntary anti-corruption initiatives

To fight against corruption and on a voluntary basis, ENGIE:

1. Supports the Global Compact

The Group aims at increasing the quality of internal procedures and reporting practices.

The Group reports to the Global Compact since 2012 on the 10th principle against corruption on 22 indicators in the framework of COP (Communication on Progress). ENGIE carries out initiatives for promoting the Global Compact with respect to its business partners.

2. Participates in Transparency International, French Section

ENGIE is a company member of the French section of Transparency International (TI), the non-profit organization that is extremely active in the fight against corruption. ENGIE agrees with TI values, its object of raising awareness and reducing apathy towards, and tolerance of, corruption, and devises and implements

practical actions to address it.

Commitments of ENGIE in relation to TI:

- decline bribery and corruption in all forms publicly and promote honest and transparent practices in all its activities
- Prevent corruption risk by adopting an anti-corruption program inspired by TI's recommendations
- Take corrective measures in case of breach in the anti-corruption prevention system, to avoid repetition

3. Monitoring

B7-Monitoring and improvement processes

The Group's monitoring and improvement process for ethics and integrity is based on 4 focus areas:

1. Managerial guidance involving the Group's entire management chain

The governance system involves the entire Group's managerial chain. It is organised as follows:

- A dedicated organisation supervised by the Ethics, Environment and Sustainable Development Committee of ENGIE Board of Directors, has been established.
- 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 organisations. It heads the Ethics & Compliance network, bringing together all the ethics and compliance officers and ethics correspondents from the Group's entities, i.e. more than 300 persons. 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.
- Responsibilities are defined at all levels of the managerial line. The Group's delegations of authority and engagement letters include a specific reference to ethical responsibilities. The Group managers are the primary guarantors of the application of ethics. They must have the tools necessary to deploy the ethics and compliance policy, and detect any violation of these rules and establish a system to control the application of the ethics and compliance systems.
- Each year, the BU Managers submit a letter of compliance certifying their commitment to the application of the ethical and compliance system within their BU accompanied by a report prepared by the ethics and compliance officer, to the Group CEO.

2. Risk, audit and control management

Ethics risks are assessed annually by each BU, and integrated into the Group annual risk review (ERM process), since 2016 on the basis of a common analysis methodology. Be they considered as major or not for entities, the results of the analysis on corruption risks and respect of human rights must be reported by BUs to the Group.

The Risks Department, the Ethics, Compliance & Privacy Department, the Internal Control Department and the Internal Audit Department contribute to the regular assessment of the

implementation of the ethics and compliance policy. Audits are also carried out. Areas are identified in coordination by these departments.

3. Annual compliance procedure

An annual compliance procedure for monitoring the application of the Group's ethics and compliance policy in the entities has been established [see D12].

4. Process dealing with incidents

The ethics incidents are monitored by the Compliance Committee, which assesses the handling of ethical incidents and monitors the process for updating the Group's ethics and compliance framework. A detailed description of procedures for dealing with incidents is given in D13.

D12-Annual Compliance Procedure

The compliance procedure allows to monitor the implementation of the Group's ethical policy in the entities: the ethics and compliance officers produce an annual report on the work and progress of their entity's ethics and compliance organisation, in applying ENGIE's rules and procedures as well as any specific measures or actions taken by the entity itself. They submit this information to the Group Ethics, Compliance & Privacy Department via the internal digital tool "REPORT'ethics".

This report, addressed to the upper level entity, is accompanied by a compliance letter from the entity manager certifying his/her commitment to the application of the ethics and compliance system within the organisation for which he/she is responsible.

Similarly, every BU manager will submit the annual letter of compliance to accompany the BU's report to the Group CEO.

On this basis, the Group Ethics, Compliance & Privacy Director establishes the ENGIE annual compliance report, presented to the Executive Committee, then to the Committee for Ethics, Environment and Sustainable Development of ENGIE Board of Directors.

D13-Dealing with incidents

ENGIE has developed a system for dealing with incidents, whose aim is to: put a stop to any unethical behaviour, ascertain precisely what occurred and determine the ramifications, propose compensation for the damage caused, punish the individuals responsible, and suggest measures for improvement.

To this end, INFORM'ethics, the confidential internal managerial reporting IT tool for ethics incidents, contributes to the monitoring of incidents follow-up, the prevention of associated risks, the company's protection and is an integral part of the Group's operational governance.

The INFORM'ethics system responds to the principle of mandatory reporting of ethics incidents identified in each of the 7 areas defined by the Group: Accounting and Financial Integrity, Conflict of Interest, Social Responsibility and Human Rights, Business Ethics, Confidential Information, Protection of Intangible Property and Data Privacy.

It is deployed in all the Business Units (BUs) and Group Functional Departments.

The reporting of ethical incidents within INFORM'ethics falls for each identified BU: to the general manager, the financial director, the chief legal officer, the director of human resources, the director of safety/security and the ethics and compliance officers; and for each identified entity: to the general manager and the ethics and compliance officers. The entity, under the responsibility of the Business Unit, is responsible for handling the incident.

Besides the reporting of ethics incidents, INFORM'ethics enables preventive and corrective measures to be launched at the instigation of the Compliance Committee. Furthermore, since end 2018 the Internal

Control Department performs in-depth analyses of incidents reported via INFORM'ethics in order to make the prevention system more efficient.

INFORM'ethics is thus part of a process of continuous improvement to enable the implementation of preventive measures in the Group.

In 2018, "Guidelines for managing early warning signs in the field of ethics and compliance" were deployed in the Group. They formalize ENGIE's commitment to prevent and detect ethical incidents as early as possible through early warning signals called "early warning signs".

D14-Public legal cases regarding corruption

The internal "Ethics compliance" referential details the control procedures contributing to fight against corruption. It is a set of procedures designed to steer ethics practices using 4 guiding principles: managerial involvement and responsibility, which showcases exemplary actions; continuous improvement of practices; the search for synergies between functional and operational actors; and the perception of ethical compliance as a contribution to the Group's global performance.

It is published on the Group intranet website, and a presentation of its principles is published on ENGIE's [corporate website](#).

D15-Use of independent external parties in view of assessing anti-corruption programs

The Group is engaged in external audit processes of its ethics and compliance system. In 2015 the Group's anti-corruption system was awarded certification by Mazars, an accounting and auditing firm, and ADIT, a business intelligence firm. In 2018, the Group was awarded ISO 37001 certification in respect of its anti-corruption management systems by ETHIC Intelligence.

The Ethics, Compliance & Privacy Department and the Sustainable Development Department also reply each year to assessments carried out by extra-financial ratings agencies.

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