



# Presentation of ethics compliance referential

**Compliance is one of the 4 principles on which ENGIE has based its ethics and compliance policy.**

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

The ethics compliance referential serves as a framework for implementing the principle of “acting in accordance with laws and regulations”.

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

## 1. Main parties involved in ethics compliance

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

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

The Group Ethics & Compliance department manages the integration of ethics into the Group's strategy, management and practices. It proposes the policies and procedures in terms of ethics and compliance and drives their application by Business Units (BUs), Métiers and functional departments. It runs a network of more than 250 people actively involved in the operational implementation of the Group's ethical commitments. It is composed of members of the Ethics & Compliance line, as well as ethics correspondents.

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

For more information on main parties involved in ethics compliance, [click here](#).

## 2. Ethics risks analysis

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

For more information on ethics risks analysis, [click here](#).

## 3. ENGIE reference texts

To date, the ethics compliance referential gathers in particular the following policies and procedures, presented on [ENGIE website](#):

- The Group whistleblowing system
- The INFORM'ethics process (tool for managerial reporting of ethics incidents)
- Mandatory ethics training
- The annual ethics compliance procedure
- The embargo policy
- The policy on incorporation of ethics into HR processes
- The policy on personal data protection
- The [policy] on the protection of confidentiality of inside information

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