

**Modern Slavery Statement**  
**(for the financial year ending 31<sup>st</sup> December 2023)**

ENGIE S.A. is the ultimate parent company of the ENGIE Group, a global reference in low-carbon energy and services. Together with its 96,000 employees, its customers, partners and stakeholders, ENGIE is committed to accelerate the transition towards a carbon-neutral world, through reduced energy consumption and more environmentally-friendly solutions. Inspired by its purpose (“raison d’être”), ENGIE reconciles economic performance with a positive impact on people and the planet, building on its key businesses (gas, renewable energy, services) to offer competitive solutions to its customers. ENGIE operates on 5 continents. Our Group’s operational activities are conducted by ENGIE S.A. and by its subsidiaries through operational organizations; compliance with our Group’s ethics and compliance principles, including those relating to the respect for human rights, forms an integral part of those operations which are conducted under the responsibility of the respective organizations’ management. To find out more about us and our activities, please visit our website: [www.engie.com](http://www.engie.com), “Who we are” and “Activities”, accessible through our Group’s website’s homepage.

As a global player in the aforementioned fields of activity, ENGIE works with a wide range of equipment and service suppliers, both locally and internationally. ENGIE considers its suppliers and subcontractors as key stakeholders in the Group’s value chain. Our Group’s commitments and requirements in its relations with these stakeholders are set forth in our Procurement Charter. This Charter is presented in detail in our Group’s Universal registration document (please see [ENGIE Universal registration document 2023](#), p 120). It provides amongst others for the following principles governing our Group’s purchasing activities:

- Selection and qualification of suppliers using multiple criteria, including societal and environmental (including human rights, in particular the rejection of any form of forced labor).
- Professionalization of staff and development of expertise of the employees in the Procurement network via a progressive, ongoing training program. In 2023, the Procurement Department set up a cross-functional training program (*Procurement Academy*) which includes a set of mandatory training courses in the following areas: Ethics, Sustainability (Energy Transition and Climate Change), Health & Safety, Management, Diversity and Inclusion, working conditions and IT security.
- Ensuring that all agreements with suppliers are the subject of a written contract that includes a mandatory ethical, environmental and social responsibility clause (including the requirement that they adhere to the Group’s human rights commitments).

The ENGIE Group’s commitment to the respect for human rights, including explicitly the rejection of forced labor, is laid down in a number of key documents, including the following ones which are all publicly available:

- our [Ethics Code of Conduct](#);

- our [Procurement Charter](#) and our [Code of Conduct in Supplier Relations](#); and
- our dedicated Human Rights Policy, called the “[Human Rights Referential: commitments and implementation](#)”.
- the Global Agreement on Fundamental Social Rights and Social Responsibility signed in 2022 by ENGIE and the Group's social partners.

In 2023, the Group adopted a new Ethics Code of Conduct. This document, which replaces ENGIE's Ethics Charter and Practical Guide to Ethics, specifies, in particular, on page 8, ENGIE's ethical commitments. These commitments include respect for human rights, in particular the prohibition of forced labor or child labor. On page 20, the Ethics Code of Conduct reiterates this principle while confirming that ENGIE expects this principle to be respected equally by all its third parties. The Ethics Code of Conduct is published on the Group's website: <https://www.engie.com/en/group/ethics-and-compliance>.

For more information on the Human Rights Policy of the Group, please visit the dedicated pages on the Ethics, Compliance & Privacy portal of our public website: <https://www.engie.com/en/group/ethics-and-compliance/policies-and-procedures/human-rights-referential>.

The Human Rights Policy is the cornerstone of the human rights component of the “vigilance plan” which the Group defined in January 2018 and which addresses the requirements of the French law on the duty of vigilance. The risk map established by the Group and which forms part of the “vigilance plan”, includes the risk of violation of the fundamental rights of workers such as the prohibition of forced labor and child labor. The vigilance plan is presented in the ENGIE Universal registration document (please see [ENGIE Universal registration document 2023](#), p 124-134). The Group created a specific section on its internet site, dedicated to the Group’s vigilance plan and its implementation: <https://www.engie.com/en/ethics-and-compliance/vigilance-plan>. This dedicated internet section was overhauled in 2021 to make it easier for all Group stakeholders to learn about the Group’s four main vigilance approaches (human rights, health and safety, CSR, procurement). ENGIE engages into voluntary commitments to advance ethics and human rights: we adhere to the United Nations Global Compact and the French section of Transparency International. ENGIE is also a member of *Entreprises pour les Droits de l’Homme (EDH)*, which aims to enhance awareness of human rights issues and their integration into the activities of member companies.

The ENGIE Group exercises vigilance through its Human Rights Policy in particular. Based on the UN Guiding Principles on Business and Human Rights, developed in liaison with the ENGIE operational organizations and adopted by the Group Executive Committee in 2014, our dedicated Human Rights Policy states in detail our human rights commitments and provides for operational processes to ensure that these commitments are lived up to, in particular:

- (1) A commitment to carry out our activities while **respecting internationally recognized human rights** including the international standards of the ILO (i.e. including the rejection of any form of forced labor), everywhere we operate (see commitments 1 and 2).
- (2) A commitment including the **supply chain** through a clause requiring compliance with our Group's commitments in terms of human rights in contracts with suppliers, subcontractors and partners of the Group (see commitment 6). The prohibition of forced labor is specifically mentioned in this clause. Through this clause, the supplier, subcontractor and partner commits to compliance in his name and in the name and on behalf of his suppliers and sub-contractors. This clause includes the challenges related to the duty of vigilance. The Purchasing reference system which includes the ethics and vigilance clause was reinforced in 2019 through the updating of the Code of Conduct in Supplier Relations to incorporate the requirements of the conventions of the International Labor

organization on fundamental workers' rights. The Group's Procurement Charter was revised in 2021 to strengthen ENGIE's requirements with regard to its suppliers in terms of human rights. Further, the due diligence policies existing in the Group since several years include checks on the respect of human rights by suppliers, subcontractors, partners and beneficiaries of patronage and sponsorships. In this context, the purchasing department systematically evaluates the Group's new strategic, preferred and major suppliers via due diligence, i.e. around 1100 suppliers representing 38% of the Group's non-energy expenditure. In 2023, the Group set up a dedicated team in charge of carrying out the due diligence of key Suppliers and equipped itself with a new digital tool providing an ethics risk score covering five dimensions: country risk, activities' risk, politically exposed persons, sanctions and controversies. This tool complements the CSR assessment carried out by an external provider on the Environment, Labor and Human Rights, Ethics and Sustainable Procurement dimensions.

- (3) **Risk analyses** by the Group entities for each project in its preliminary phase and on a yearly basis for activities (for the latter: assessment done in the framework of the Group's ERM process). These analyses specifically include questions to ensure that Group entities do not participate in, or benefit from, any forced labor whatsoever. The countries considered at high risk with regard to human rights violations must undergo further assessment. Accordingly, a specific in-depth vigilance action plan to identify and manage the risks of forced labor practices in the Group's supply chains located in China has been implemented since 2021. This action plan has been renewed each year for the field of solar and extended to the "wind turbines" purchasing category for new Chinese suppliers. Methodological and awareness-raising tools are available to the Group entities to assist in these risk analyses. These tools are regularly updated as part of the Group's continuous improvement approach. They include a precise definition of forced labor according to the ILO standards, they rank the risk of forced labor for each country, and they list the points (through a standard Group check-list) that need checking to ensure the Group entities do not make use of this type of work. The 2023 yearly risk assessment exercise did not reveal forced labor as a salient human rights risk for the Group; i.e. either the risk is not existent or, if existent – in particular in countries at risk for this type of human rights violation as per the methodological tool used in the Group to identify such countries -, it is addressed through our Group's ethics and compliance framework.
- (4) **Training and awareness-raising modules** focusing on human rights, including the issue of forced labor through practical cases, available for all Group employees in addition to the dedicated training for Purchasers mentioned hereabove in this Declaration. In that respect an in-person training on the Group's human rights approach and an e-learning module on human rights for all employees were initiated in 2019 and again deployed every year, including in 2023.
- (5) **Grievance mechanisms** set up at operational level and at ENGIE Group level for anyone affected by our Group's activities. In 2018, the Group deployed its current Whistleblowing Policy. The whistleblowing system, open to all employees and to all external Group stakeholders worldwide since 1<sup>st</sup> January 2019, covers all vigilance challenges. The alert is received by an external service provider that transmits the report anonymously to ENGIE for processing. There were no reported violations on forced labor in 2023.
- (6) **Monitoring of the implementation of these measures** through our Group's ethics and compliance process, internal control process and through internal audits. No issues relating to forced labor were identified in 2023 in the framework of the control processes.

The Global Agreement on Fundamental Social Rights and Social Responsibility signed in 2022 by ENGIE and the Group's social partners also contributes to the management of risks related to, for example,

fundamental workers' rights, occupational health and safety, and suppliers and subcontractors (please see [ENGIE Universal registration document 2023](#) p.126).

The due application of these principles is monitored by the ENGIE S.A. Board through the EESD Committee (Committee for Ethics, Environment and Sustainable Development of the ENGIE Board of Directors), in particular within the framework of the Group annual compliance procedure.

Through this framework we ensure that our expectations towards our people and our suppliers, subcontractors and partners in relation to banning any use of forced labor, including human trafficking and slavery, are addressed.

This statement aims at addressing the reporting requirement of the UK Modern Slavery Act 2015 for ENGIE Group which carries on business in the UK, it being understood that where ENGIE Group entities may have submitted their own statement to that effect, the current statement comes in addition thereto.

This statement has been approved by the ENGIE S.A. Board of Directors on 16<sup>th</sup> May, 2024.

Original copy signed on 19<sup>th</sup> June 2024, by Catherine MacGregor, Member of the Board of Directors and Chief Executive Officer of ENGIE S.A.