

BIODIVERSITY POLICY

Group General Policy

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1. Perimeter

This policy applies to all Group activities, as well as to the upstream chain. It covers all consolidated financial reporting entities.

2. Context

The planet is facing an unprecedented erosion of biodiversity since the beginning of mankind. Human activities are at the root of this predicted sixth mass extinction. Indeed, all human activity is dependent on nature, which contributes directly and indirectly to the quality of life, by providing material goods (water, raw materials, etc.), regulating environmental conditions (climate, quality of water, air, soil, etc.) and through non-material contributions (living environment, health, cultural role, etc.).

To meet this global challenge, each player, whether public or private, can take action at their own level, depending on the impacts and dependencies on biodiversity associated with their activities.

The Group's activities are in constant interaction with biodiversity: some benefit from the services provided by nature (biomass, watercourses, climate regulation) and others, through the footprint of industrial sites, have an impact on ecosystems, which varies according to the type of activity and the location of the sites.

But whether in the city or the countryside, ENGIE sites can contribute to restoring ecological continuity and preserving ordinary biodiversity.

ENGIE has been committed to preserving biodiversity since 2011, first through its commitments in the French National Strategy for Biodiversity, then in a more international dimension through the signing of the Cancun pledge in 2016, its membership of the "Make it Mandatory" campaign at COP 15 in Kunming Montreal in 2022, and by publishing its strategy for taking Nature into account in its activities as part of the 2024 "It is Now for Nature" campaign. The Group has also made concrete, global commitments as early as 2018 in the act4nature approach, then in 2021 in Entreprises Engagées pour la Nature¹ and act4nature International². These latter commitments were updated in 2023. ENGIE benefits from the expertise of French and international partners: the IUCN French Committee³ and the UNEP World Conservation Monitoring Center⁴. Some Group subsidiaries also have partnerships with the French National Museum of Natural History, the "Ligue de Protection des Oiseaux", and Birdlife internationally.

3. Governance

The ENGIE's Board of Directors, supported by the Ethics, Environment and Sustainable Development Committee ("CEEDD"), ensures that the various extra-financial issues (Environment, Social and Governance) are taken into account in the Group's strategy, including the biodiversity issue. It is also responsible for validating ESG objectives and regularly reviewing progress.

¹ [ENGIE | Engagés pour la nature \(ofb.fr\)](#)

² [ENGIE-VF-29_04.pdf \(act4nature.com\)](#)

³ *Union Internationale pour la Conservation de la Nature*

⁴ *United Nations Environment Programme*

The ENGIE's Board of Directors, supported by the Investment and Technology Committee ("CIT"), ensures that ESG issues, including biodiversity-related impacts, risks and opportunities, are properly integrated into the Group's strategic investment projects.

The Executive Committee validates the Group's policies covering Nature issues, including biodiversity. It supports each of the associated ESG objectives, and monitors their implementation and performance. The Managing Director is also a signatory to the act4nature international commitments.

4. Actions

ENGIE is committed to complying with environmental and social laws and regulations applicable to its activities in the countries where it operates.

With the ambition of contributing to the global objectives of the Kunming Montreal Convention on Biological Diversity, defined in the Global Framework for Biodiversity, the Group's biodiversity strategy is part of a Nature Positive approach.

To this end, at the end of 2023, the Group strengthened and updated its objectives and commitments to 2030 in order to reinforce and adapt them to the global Nature Positive trajectory. These commitments are built in collaboration with stakeholders in the territories in which the Group operates, in line with the Group's policy of dialogue with its stakeholders, integrating affected communities, local communities and indigenous peoples.

At regular intervals, and at least once a year, the Group analyzes its impacts on and dependence on biodiversity and ecosystems across its entire value chain, according to the 5 major pressures defined by the IPBES⁵ - land use change, resource depletion, climate change, pollution and invasive alien species - in order to identify actions that can help reduce its impacts and control its dependence, while respecting the shared commitments of the act4nature international and Entreprises Engagées pour la Nature programs.

In order to reduce the terrestrial and aquatic footprint, contribute to the restoration of ecological corridors and reduce the presence of invasive alien species, the Group :

- Implement ecological site management wherever possible, i.e., at the very least, banning the use of chemical plant protection products and promoting green space management that respects nature and its cycles, and encourages local/endemic biodiversity.
- Locates protected areas and sensitive zones⁶ near its industrial sites, using tools made available to all its employees, identifies and qualifies the proximity of its sites in order to define, in consultation with local stakeholders, the most appropriate actions to minimize its impacts, or even transform them into positive impacts, while exploring innovative certification and financing tools.
- Committed to applying the "avoid, reduce, compensate" sequence to project development worldwide.

To help reduce the pressure on biodiversity caused by climate change, the Group has implemented a climate policy aimed at significantly reducing greenhouse gas emissions for its own activities, as well as for its customers and suppliers.

⁵ Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services

⁶ Catégories UICN I à VI, KBA, sites UNESCO (naturels et mixtes), MAB, RAMSAR, Natura 2000

Wherever possible, the Group strives to identify and implement Nature-based Solutions, in line with the standard defined by the IUCN, enabling us to restore biodiversity and ecosystems, and adapt to the impacts of climate change and natural disasters. More generally, the Group supports and promotes operational initiatives aimed at developing innovative solutions that benefit local communities throughout the lifecycle of its activities.

The Group acts on its value chain through its sustainable purchasing policy to include biodiversity, soil, water, deforestation..., exchanges with key suppliers and subcontractors, supports them in nature-related challenges, and accelerates the ecological transition with its customers. For biomass from the wood industry, the forest policy defines the Group's principles and commitments in terms of sustainable biomass.

Awareness-raising and training are key elements in the Group's approach to taking on board the importance of biodiversity in the development of its activities. ENGIE therefore continues to raise awareness among its employees at all hierarchical levels, and encourages the exchange of practices within its internal network of experts and practitioners.

As part of its efforts to improve knowledge of biodiversity and ecosystems, the Group also shares its observations, results of studies and fauna and flora inventories via the GBIF platform⁷.

Finally, the Group relies on the maintenance and development of its partnerships with biodiversity stakeholders to integrate biodiversity as effectively as possible into the development of its activities, and also to contribute to the development of knowledge on biodiversity at local and international level.

5. Implementation in Group processes

Biodiversity and ecosystem issues are fully integrated into the Group's core processes.

Strategic process: ENGIE's strategy is impacted by Nature issues, including biodiversity. The environment is part of ENGIE's Purpose and the associated issues are integrated into strategic thinking.

Performance reviews: Biodiversity performance is monitored and targets reviewed annually when the results for the year are presented to the Executive Committee and CEEDD.

Vigilance process: a biodiversity risk analysis for existing sites is carried out annually. Local entities then develop action plans in consultation with stakeholders to address identified impacts and risks. These action plans are analyzed and questioned annually during environmental reporting.

Investment process: each investment is subject to an ESG assessment. Biodiversity is fully integrated among the criteria analyzed, and impacts and risks assessed for both the construction and operating phases.

Stakeholder relations : Action plans developed and implemented by local entities are drawn up and monitored in consultation with the relevant stakeholders.

Employee training: ENGIE considers the acculturation, skills development and commitment of its employees to be a powerful lever for supporting the transformation of its business. . In addition to the ongoing commitment of skilled

⁷ GLOBAL BIODIVERSITY INFORMATION FACILITY

operators to sustainable operations, ENGIE created its Sustainability Academy in 2021, which enables ENGIE employees to be internal ambassadors for the Group's strategy and its operational implementation.

Research and development: ENGIE's Research and Innovation division conducts work on measuring the biodiversity footprint of activities and supports theses and research projects, for example on the implementation of the ERC or species inventories.

The implementation of this policy and the measurement of the effectiveness of actions are framed by objectives and targets defined for 2030.