



## Code of conduct on lobbying

ENGIE, a leading player in gas, electricity and the energy transition, is present in many countries around the world. In this regard, the Group is particularly attentive to the laws and regulations of the countries in which it operates. In order to promote its positions and best practices, it acts in consultation with all stakeholders.

ENGIE defines lobbying activity as promoting and defending the interests of its entities by informing the stakeholders concerned in the technical, economic, environmental and social fields. ENGIE wishes to share its vision of the energy system and its technical expertise with institutional bodies, in particular with members of government and parliament, central administrations and local authorities, and to inform them about the Group and promote its values, businesses and services. These positions, whilst taking into account the

general interest, aim to inform the various actors' public decision-making. To this end, ENGIE acts directly with its institutional contacts and/or contributes to the work of professional associations which also carry out lobbying activities. Additionally, the Group can call upon external lobbying organisations to support it on a particular mission.

ENGIE gives itself the means to put in place a high standard of ethical criteria to govern its lobbying activities. This activity is fully in line with the Group's global policy on ethics and environmental and social responsibility. Its governance structure is placed under the auspices of the Board of Directors, through its Committee on Ethics, Environment and Sustainable Development.

As an essential instrument of transparency, this present code of conduct is an addition to the foundation of ethics documents that already exist: an [Ethics charter](#), a [Practical guide to ethics](#) with the objective of helping employees in their decision-making, an integrity referential, a human rights referential, a management of ethical compliance referential and codes of conduct for its *métiers*.

This code of conduct applies to all lobbyists acting for ENGIE:

- employees of ENGIE who may undertake lobbying activities among institutional actors for the Group or its subsidiaries;
- where applicable, members of outside firms requested by the Group to undertake lobbying activities with institutional actors.



## Transparency, integrity and reliability: Group's commitments

- ENGIE is committed to allowing public access:
  - to its main positions on its website, and to updates thereof in the event of new and significant information;
  - to the lists of the main think tanks and professional associations of which it is a member and in which it is active.
- The Group is committed to promoting the lobbying practices set out in this code of conduct among all its contacts and thus contribute to the development of high standards in the industry.
- The Group refuses to take part in financing any political activity, even in countries where this is authorised and regulated by the law.
- For the sake of information and transparency, this lobbying code of conduct is posted on the Group's website.

## Transparency, integrity and reliability: lobbyist's commitments

**Each lobbyist acting for ENGIE is committed to:**

- Indicating, when communicating with institutional actors, whether he/she is acting on behalf of ENGIE or in support of a professional association of which ENGIE is a member.
- Carrying out his/her lobbying activities in accordance with ENGIE's fundamental ethical principles: act in accordance with laws and regulations; behave honestly and promote a culture of integrity; be loyal; respect others.

Which excludes, among other things:

- any act of corruption or influence peddling, whether active or passive.
- offering or accepting advantages of any kind which do not correspond to a simple display of courtesy, in compliance with the gifts and hospitality policy applicable within ENGIE.
- situations of conflict of interests: in case of doubt, any lobbyist acting for ENGIE will verify with his/her manager or ethics & compliance officer (for any ENGIE employee) or his/her firm or professional organisation (for any member of an outside firm) that he/she is not in a situation of conflict of interests. When choosing the Group's lobbying actors, care will be taken to

retain only those who commit to applying the principles contained in this code of conduct and to respecting the Group's [Ethics charter](#). In the case of persons exercising public responsibilities, they may only act on behalf of the Group if the legislation that applies to them so allows, in order to avoid any conflict of interests.

- Conditioning the Group's financial participation in symposiums, whatever the organizing body, to a partnership agreement that sets out the terms for this participation.
- Appearing on lobbyists' registers of organisations where they carry out lobbying activities, where these exist, and respect the codes of conduct and regulations of those same organisations.
- Observing the codes of conduct and regulations of the institutions, in particular in the context of their missions of general interest, and of the professional organisations in which they operate.
- Providing reliable information.

## Developing and defending Group positions

- In France, ENGIE's lobbying activities are placed under the authority of the France Institutions and Territories Department. This headquarters department coordinates, in accordance with the rules applicable to regulated subsidiaries, the Group's lobbying actions and calls on Group managers and experts to defend its positions.
- ENGIE's lobbying activities with the European Union institutions and bodies as well as the public authorities of European Union Member States on European subjects are carried out by the European Affairs Department, present in Paris and Brussels and placed under the authority of the Group's General Secretariat. At the European level, lobbying activities are carried out on the basis of a coordinated and defined ENGIE position, in close collaboration with the departments at headquarters and the operational entities.
- In other countries, these activities are carried out by the Business Units in coordination with the European and International Relations Department at NewCorp.

## Compliance approach

A responsible lobbying activity requires great rigour, therefore each Director of a Business Unit or at headquarters, with regard to the lobbying activities carried out for his or her organisation:

- Ensures that the Group's positions are known to lobbyists acting for ENGIE.
- Ensures that persons permanently assigned to the lobbying activity have the skills required to carry out their duties, receive regular training in their field of action and receive the support and instructions required for their activity.
- Ensure that any identified breaches of the principles and commitments of this code of conduct are duly terminated.
- Carries out a review of the lobbying action performed within its scope of activities.

## Advice or reporting

- Anyone who wishes to request an opinion or advice, for example in case of doubt about how to act, or to point out a difficulty or failure, can contact his/her managers or ethics & compliance officer (for any ENGIE employee) or his/her firm or professional organisation (for any member of an outside firm).
- Information on ethical incidents falling under this code of conduct will be communicated to ENGIE's Committee on Ethics, Environment and Sustainable Development as part of the Group's ethical compliance process.
- Any breach of this code of conduct may also be reported by any person inside or outside the Group to the Group's ethics alert e-mail address at [ethics@engie.com](mailto:ethics@engie.com).