



ENGIE's answer to Business & Human Rights Resource Centre Survey Questions

April 14th 2022

As previously publicly mentioned in a Statement dated 2 March 2022, the ENGIE Group condemns the invasion of Ukraine and expresses its support for the affected people. The Board expressed heartfelt concern in relation to this situation, which is endangering peace in Europe, as well as the lives of civilians. In light of this situation, the Board supports decisions made by the European Union.

ENGIE has been invited in March 2022 by the Business & Human Rights Resource Centre to respond to a Survey about ENGIE's human rights due diligence related to the company's operations and/or investments in Russia and/or Ukraine, however, ENGIE does not operate or invest in Ukraine or Russia.

ENGIE does not engage in any industrial activity in Russia and no investment projects are underway on Russian territory. ENGIE has only a simple representative office in Moscow.

In Ukraine, one employee was based in the country and has been exfiltrated at the very beginning of the conflict. ENGIE has no activities in Crimea, Donbass or Luhansk Oblasts.

ENGIE has a Human Rights Policy since 2014 to ensure compliance with the Group's commitments in all its activities by implementing a global vigilance approach. ENGIE is committed to conducting its business in a manner that respects internationally recognized human rights wherever the Group operates. The Group exercises vigilance by identifying and managing any risks to people that arise from its activities. The vigilance approach is guided by the UN Guiding Principles and French law on the duty of vigilance of parent companies and ordering companies.

ENGIE has implemented for years an embargo Policy pursuant to which any contemplated transaction related to Russia or with a Russian individual or entity is subject to a comprehensive due diligence on international sanction laws and in ethics.

The due diligence process identifies the persons and entities involved in the contemplated transaction : clients, contractors and subcontractors, financials... Individuals, corporate structures, their officers and shareholders, as well as their respective Ultimate Beneficial Owners are subject to a comprehensive due diligence so as to review their compliance with regard to international sanction laws and with regard to ethics.

ENGIE complies with applicable international sanction laws.

We also invite you to read ENGIE's Press release dated 2 March 2022 which is a Statement on the crisis in Ukraine.