

ANTI-POLLUTION POLICY (Group General Policy)

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Introduction

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

As a major player in the energy sector and in decarbonization, ENGIE recognizes the impact of its activities on the environment. In a context of accelerating climate change and environmental degradation, it is imperative to act responsibly to reduce polluting emissions into the air, water and soil. ENGIE is committed to implementing innovative solutions for cleaner energy and actively contributing to the fight against pollution.

The main types of pollution emitted by the Group are (i) air pollution (nitrogen dioxide, sulfur dioxide, particulate matter and, to a lesser extent, mercury), (ii) water pollution (temperature variations, traces of disinfectants) and (iii) accidental soil pollution (leachates, PAHs¹).

For air pollution, the associated activities are electricity and heat production units. For water discharges, these are mainly thermal power plants, desalination plants, LNG terminals and heat production units. Finally, with regard to soil pollution risks, biomethanizers present an accidental risk, and our former gas plants are sometimes sites containing PAHs.

Noise and odor pollution are not detailed here, as they are given special attention in our stakeholder engagement policy.

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 pollution issue. It is also responsible for validating ESG objectives and regularly reviewing progress.

The Executive Committee validates the Group's policies covering Nature issues, including pollution. It supports each of the associated ESG objectives, ensures their implementation and monitors performance.

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

4. Actions

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

As part of its own operations, the Group is committed to the following actions to effectively reduce the various forms of pollution:

¹ Polycyclic Aromatic Hydrocarbons from the manufacture of town gas at the beginning of the 20th century

- The Group measures and is committed to reducing emissions of atmospheric pollutants, the main ones generated being nitrogen oxides (NOx), sulfur oxides (SOx), particulate matter and, to a lesser extent, mercury.
- Although the potential impacts in terms of water and soil pollution for ENGIE's direct operations are of a less significant nature, both for the environment and for the health of third parties, the Group undertakes to ensure regular monitoring of various parameters, for example changes in the temperature of discharged water or the release of chlorine residues.
- Within the limits of technical and economic feasibility, the Group is committed to implementing the best available technologies to reduce discharges to water, air or soil as much as possible.
- In order to improve diagnosis and adjust reporting in future years, the Group is setting up a qualitative inventory system for substances of concern, substances of very high concern and microplastics that could be discharged into the natural environment by various industrial processes.

In the upstream chain, ENGIE asks its suppliers to integrate environmental issues, including pollution, and to take the necessary steps to reduce it.

Finally, the Group works with governments, local communities and non-governmental organizations to develop effective policies and initiatives to fight pollution.

5. Implementation in Group processes

Pollution-related issues are integrated into the Group's main processes.

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

Performance reviews: pollution reduction performance and targets are reviewed annually when the annual results are presented to the Executive Committee.

Vigilance process: a pollution 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. Pollution is fully integrated into the analysis criteria, and impacts and risks are assessed in terms of emissions into the air, water or soil during the construction and operation 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 operators to sustainable operations, ENGIE created its Sustainability Academy in 2021, which enables ENGIE employees to be internal ambassadors for the Group's ESG strategy and its operational implementation.

Research and development : ENGIE's Research and Innovation division devotes part of its resources to pollution research. Example: improving the measurement of atmospheric pollutant emissions, and potential disturbances occurred by the discharges into water and oceans.

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