Supply Chain Management and Ethical Business Principles
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1. Code of Conduct in Supplier Relations

This commitment implies in the first place that our Company makes every effort to comply at all times with the rules and principles of action outlined in our Ethics Policy. Everyone who acts on behalf of the Company, must be fully aware of such requirements, and must apply these business practices in their professional activities.

The Company policies outline ENGIE Fabricom’s requirements and commitments in its supplier relations with the objective to offer competitive and sustainable solutions and provide a safe working environment while complying with principles of ethical business conduct.

In order to support implementation of our ethics standards, we implement a Code of Conduct in supplier relations. This code details the 7 principles we follow in our relationships with our suppliers and how the ethics procedure is to be applied in practice.

This Code of Conduct in supplier relations is intended for all employees working with the Company’s suppliers, including requestors, buyers, procurement partners, users, managers, project managers, etc.

We must all ensure at all times that our suppliers are fully aware of our Ethics Policy and that their conduct is consistent and aligned with the Company’s commitments.

Ethics are fully incorporated in the Company’s vision, strategy and management, and must therefore feed the business practices of each and every one of us on a daily basis.

**PRINCIPLE 1**

Comply with laws, regulations, external standards, Group commitments and internal procedures

Any person potentially able to have an influence on the purchasing process (requestors, buyers, supply officers, users, managers, project leaders, etc.) must act in accordance with the relevant rules, regulations and standards governing their professional activities.

- All parties involved must observe national and international regulations related to: human rights, fair competition, anti-corruption, safety and well-being of workers, child protection, and protecting the environment

- ENGIE FABRICOM’s Ethics Policy sets out the general rules and principles and is applicable at all operational locations

**PRINCIPLE 2**

Treat suppliers fairly, transparently and impartially

Our suppliers must be selected via a transparent, open, fair and thorough process. The Company ensures that offers are competitive, for sustainable and innovative solutions, and that relations based on mutual trust are established requiring suppliers to observe ENGIE Fabricom’s social and environmental commitments.

- The criteria governing the selection of suppliers and awarding of contracts shall be objective (technical, quality, contractual commitments, cost, CSR)
• All parties involved are to be informed of how the selection procedure will be conducted and of the details of the contract to be awarded (commitments, deliverables, schedule, responsibilities)

• The objectives of all relevant parties must be clear and shared.

• Information regarding a call for tenders must be communicated in the same way to all participating suppliers

• Commitments must only be undertaken on the basis of reliable and verified information

• The negotiation of purchasing conditions with a supplier must remain free and entirely disconnected from the sales activities when such supplier is also a client (no reciprocal commitments)

PRINCIPLE 3

Ensure that mutual commitments are respected

Any contract entered into must encompass all the responsibilities and mutual commitments undertaken by the parties.

• All parties involved must fulfil their obligations in good faith and in a constructive spirit, with due regard to the expectations of all stakeholders

• Buyers, requestors and accountants must ensure that payment terms are met and that fair competition is guaranteed

• In the event of a dispute, amicable solutions must be sought to resolve the matter quickly and objectively

PRINCIPLE 4

Protect the confidentiality of all information exchanged

Relationships with our suppliers often include access to trade secrets and suppliers’ know-how. Employees must in that regard exercise the utmost care and ensure compliance with the relevant internal rules.

• Suppliers’ confidential information and information exchanged during the requests for tenders phase are their property and must be treated accordingly

• The intelligence gathered by our teams is the property of ENGIE Fabricom and must be treated with the required level of confidentiality. Employees must follow the Company’s rules for the management of confidential data, see Procedure CPP06

• Such information constitutes intellectual capital belonging both to suppliers and to ENGIE Fabricom. Any party getting access to such information must ensure that it is kept confidential
Any failure to fulfil this obligation may jeopardise the interests of either an individual supplier or our Company as a whole and may result in loss of competitive advantage

PRINCIPLE 5

Foster awareness of and meet the Company’s commitments with regard to ethical standards, sustainable development and social responsibility

Relations with suppliers must not give rise to situations likely to undermine the Company’s commitments.

- All buyers must ensure that any potential supplier is familiar with ENGIE FABRICOM’s Ethics Policy, which can be consulted on the Company’s website (www.engie-fabricom.co.uk)
- Where appropriate, during the supplier selection phase, buyers must take into consideration the suppliers non-financial performance in terms of ethics and compliance, sustainable development and corporate social responsibility
- Buyers must request the selected suppliers to accept ENGIE Fabricom’s ethics, environmental and social responsibility clause
- Any suppliers who – either directly or via one of their subcontractors – engage in any form of child labour, illegal or forced labour, corruption or discrimination in the framework of any activities for the Group, are excluded from business dealings with ENGIE Fabricom

PRINCIPLE 6

Avoid any conflict of interests that may undermine objective and independent decision making

All parties involved in purchasing are particularly exposed to pressure and solicitations.

- All employees enjoying a degree of influence over purchasing decisions must ensure that they remain impartial at all times
- Employees must withdraw from any situation in which a separate secondary interest from that of the company may influence their professional conduct
- Employees must prohibit all forms of corruption
- Small gifts presented in line with national customs and invitations from suppliers to attend collective business events are permitted where such gifts or invitations are of a one-off nature and have been authorised by the management
- In all other cases, employees shall not accept or request gifts, favours or invitations for themselves or on behalf of others from any individuals or organisations linked to them – directly or indirectly – via a business contract
PRINCIPLE 7

Report any situation that does not comply with these rules

The procurement process requires great rigour in order to protect the Company and its image.

- Seeking financial results may never justify a deviation in behaviour
- Any individual seeking an opinion, advice, or wishing to report an issue, can contact his/her line manager or the Company’s ethics officer
- Where there is any doubt as to what course of action to take, or where the behaviour shown or means used appear to be in breach of the conduct, employees are encouraged to alert the Company through their manager or the Ethics Officer. Suppliers are also invited to signal any ethical incidents involving ENGIE Fabricom
2. Supply Chain

Ethics and legal requirements

ENGIE Fabricom conducts its business ethically and in accordance with the law and requires its supply chain partners to conduct their business in a similar manner.

Supply chain partners must:

- Comply with all applicable anti-trust, competition laws, and anti-corruption laws including the UK Bribery Act 2010, and have in place adequate policies and procedures designed to effectively prevent bribery and corruption. ENGIE Fabricom’s requires the highest standards of integrity from all its partners.

- Disclose in advance any relationship with an ENGIE Fabricom director, officer or employee or person working with ENGIE Fabricom that represents or might appear to represent a conflict of interest.

- Keep complete, accurate and reliable records of all matters related to their business with ENGIE Fabricom and provide copies of relevant records on request.

- Protect ENGIE Fabricom’s confidential information and take all reasonable steps to prevent its disclosure, loss, theft, damage or unauthorised use.

Supply chain companies partners must not:

- Develop any relationship with an ENGIE Fabricom director, officer or employee or those working for ENGIE Fabricom, whether financial or otherwise, which might conflict, or even appear to conflict, with such person’s obligation to act in the best interests of ENGIE Fabricom.

- Engage or allow others to engage in any form of bribery, or even the perception of bribery intended to improperly influence someone.

- Offer any incentive to any ENGIE Fabricom director, officer or employee or such person’s family or friends in order to obtain, retain or influence ENGIE Fabricom business.

Human rights and labour standards

We expect ENGIE Fabricom’s supply chain to demonstrate their commitment to human rights by respecting the rights and dignity of all their employees and those of their suppliers and to treat them fairly.

Supply chain partners must:

- Set working hours, wages and overtime pay in compliance with all applicable laws. Workers should be paid at least the minimum legal wage in the country the worker is employed, or a wage that meets local industry standards, whatever is greater.

- Ensure all workers are provided with recruitment agreements and employment contracts in writing as required by applicable laws, in a language understood by them.
• Ensure the work relationship between their workers and their suppliers is freely chosen and free from threats and that all workers are free to have time off, or to leave their employment or work after giving reasonable notice in compliance with all applicable laws

• Comply with all applicable laws on harassment and abuse of employees

• Employ workers on the basis of their ability to do the job, not on the basis of their personal characteristics or beliefs (including race, colour, gender, ethnicity, nationality, religion, sexual orientation, age, disability, maternity or marital status)

• Respect freedom of association and the right to collective bargaining. Where collective bargaining is restricted under law, the employer must not hinder the development of parallel means for independent and free association and bargaining

• Have adequate policies and reliable systems to prevent the use of illegally or unethically sourced materials, in particular policies and systems to prevent improper procurement of “conflict minerals”

• Supply chain partners must only use sources that have been verified as conflict free, and provide supporting data on its supply chain for those materials to ENGIE Fabricom promptly when requested

• Use recruiters that uphold and respect the standards contained in this supply chain policy and reflect best practices for recruiting in respect of human rights and labour standards

• Have robust policies and arrangements implemented to control their own supply chain, which as a minimum, demonstrates equal controls and expectations as included in the ENGIE Fabricom’s Supply Chain Management and Ethical Business Principles

Supply chain partners must not:

• Use any forced, bonded, involuntary prison or child labour

• Subject their employees to psychological, verbal, sexual, or physical harassment or any other form of abuse

• Use misleading or fraudulent practices during the recruitment of employees or offering of employment, such as failing to disclose or misrepresenting key terms and conditions of employment, including wages and benefits, the location of work, the living conditions, housing and associated costs, and any significant cost to be charged to the employees, and, if applicable, the hazardous nature of the work

• Use recruiters that do not comply with local labour laws

• Charge employees recruitment fees

• Retain workers’ identification documentation
Use temporary labour arrangements solely for the purpose of avoiding obligations to workers under labour or social security laws and regulations arising from the regular employment relationship.
3. Corporate Social Responsibility (CSR) – Policy Statement

ENGIE Fabricom’s CSR policy can be broken down into four themes: diversity, inclusion, solidarity & social ties, and well-being at work.

Creating Value and Performance

Today's CSR challenges are part of a wider context where the social and economic issues facing the Company are generalised. Furthermore, changes to energy activities means we need to attract tomorrow's skills while respecting equal opportunities and fair treatment, to develop innovation and thereby support the Company’s transformation.

One of ENGIE Fabricom's key priorities when it comes to social responsibility concerns youth employability. Young people are the key players in our future, tomorrow's corporate talents, and creators of performance. They constitute a hive of innovation, new skills, entrepreneurship and ideas at a time when the Company needs to embrace energy transition and technological change.

Youth employability also implies more synergy between the worlds of business and education, a synergy that ENGIE Fabricom has been working towards through its relationship with the education system and through outreach initiatives for high school and college students.

Just like the employability of young people, employee engagement is a major challenge for the Company, and one of its shared values.

Because this commitment is a key factor for corporate performance, boosting our capacity for innovation, ENGIE Fabricom has strengthened its policy for quality of life at work, crucial to increasing the involvement of the women and men within it. This primarily involves listening to employees and holding professional discussions in working teams. Everyone must be able to regularly and confidently express themselves when it comes to their work life and their expectations. Professional recognition, trust between workers and their effectiveness depends on this.

The four themes of the Company’s CSR policy: Diversity, Wellbeing at Work, Inclusion, Social Ties and Charities

Being active in the field of social responsibility not only means acting with regard to existing legal obligations but also anticipating changes in society as a whole. The Company’s objective is to create environments that encourage reflection and ideas, in order to envisage the company of the future and adapt its current operations in light of these developments.

Diversity

For ENGIE Fabricom, combating all forms of discrimination, promoting equal opportunities, and integrating and supporting young people, over-55s and people with disabilities, regardless of their background, are its main priorities.

For this diversity to be truly effective, the Company advocates the principle of equal opportunities in access to employment. It is committed to combating all forms of discrimination in recruitment, access to training and promotions, and more broadly in all aspects of the company.
The Company has initiated various measures both in-house and with its stakeholders. These challenges are reflected in the policies and/or agreements established by ENGIE Fabricom in the field of CSR:

With regard to diversity and gender equality, the ENGIE Group has set itself the target of 25% of women in the group’s workforce.

Each entity applies this policy across all of its regions, taking into account specific operational and local conditions. Exciting initiatives are therefore being implemented for the recruitment and professionalisation of people with disabilities. One of our main objectives is to work together to address new disability-related topics, particularly those that are too often overlooked, such as “dys”-type problems. Another priority is to consolidate our ambitions in terms of responsible purchasing.

Knowledge transfer between generations is promoted by encouraging older workers to train younger employees.

The affirmation of the principle of non-discrimination requires compliance with 20 legally established criteria. Belonging to a religion or not is one of them. ENGIE Fabricom therefore agrees that no employee or candidate will be treated unfavourably because of their religious beliefs.

In addition to equal treatment, the question is how to manage this diversity and to reconcile the smooth running of the business with the demands of employees in this matter which, although still in the minority, are nevertheless present.

Wellbeing at Work

Quality of life at work is a source of human development and performance. It is based on the professional commitment of employees. Listening to employees and holding professional discussions about work, promotes recognition of people, and trust in them and their effectiveness.

Quality of life at work, taken in its collective and individual dimension, encompasses multiple elements related to the organisation of labour, relations with colleagues, and corporate culture. It reinforces employee commitment, motivation and creativity, all of which are key elements for the company’s transformation through social innovation.

Inclusion:
Helping people with difficulty accessing employment to obtain and retain a job

We are committed to helping people with difficulty accessing employment to obtain and retain a job. To this end, it is important to orient the youngest among them towards apprenticeship, guidance and training schemes that will allow them to find their place in this changing economic environment.

Thanks to its local roots and close ties with social actors such as local authorities and charities, the Company implements innovative social actions to provide sustainable jobs to these vulnerable groups.
Social Ties and Charities

ENGIE Fabricom is committed to working with local communities and to forming proactive ties with community groups. The Company also encourages employees to engage with local and national charity campaigns throughout the year.

Specific arrangements at both corporate and individual project level are implemented to integrate business performance with donations to charitable organisations, which have been selected by the Company’s employees.
4. **ENGIE Fabricom’s Respect to Human Rights**

ENGIE Fabricom’s commitment in relation to human rights is to carry out its activities in accordance with internationally recognised human rights wherever it operates in accordance with the highest standards of protection of human rights (national laws or international standards).

It is also committed to:

- Ensuring compliance with the fundamental rights of its employees, as defined by the ILO (International Labour Organisation) standards: abolition of forced labour and child labour, non-discrimination, freedom of association and right to collective bargaining
- Rejecting all forms of harassment and violence in the workplace and offering its employees a work environment that is respectful of their individual rights and their privacy
- Ensuring that its activities do not infringe the rights of local communities surrounding its sites and that assignments related to the security of its assets and its employees are conducted with respect for human rights
- Including in its contracts with its suppliers and partners a provision requiring the respect by them of ENGIE Fabricom’s human rights commitments

The ENGIE Group’s Human Rights Referential "Commitments and Implementation" Document describes the procedure for implementing the ethical principle “respecting others”, reaffirms ENGIE Fabricom’s commitments and expands on the guidelines presented in ENGIE Fabricom’s ethical documents. Different methodological tools for internal use support the referential in order to help managers implement it.

**ENGIE Fabricom’s Commitment No 1:**

The Company carries out its activities while respecting internationally recognised human rights, wherever it operates.

**ENGIE Fabricom’s Commitment No 2:**

The Company will make sure that the fundamental rights of its employees are respected, in accordance with the conventions of the ILO:

- It rejects all forms of forced or compulsory labour
- It rejects all forms of child labour
- It rejects all forms of discrimination
- It recognises freedom of association and the right to collective bargaining
Moreover, it pays particular attention to guarantee:

- The highest standards of health and safety in the workplace
- Working hours and holidays in accordance with international standards

**ENGIE Fabricom’s Commitment No 3:**

The Company rejects all forms of harassment and violence in the workplace and will make sure that its employees are provided with a working environment that is respectful to their individual freedoms and privacy.

**ENGIE Fabricom’s Commitment No 4:**

The Company will make sure that its activities do not infringe the rights of local communities surrounding its sites.

**ENGIE Fabricom’s Commitment No 5:**

The Company will make sure that assignments related to the security of its employees and assets are conducted with respect for human rights.

**ENGIE Fabricom’s Commitment No 6:**

The Company includes in its contracts with its suppliers, contractors and partners a provision requiring the respect by them of the Company’s human rights commitments.

**ENGIE Fabricom’s Commitment No 7:**

The Company respects internationally recognised human rights in its relations with public relations.
5. **ENGIE Fabricom’s Approach to Sustainability**

For us, sustainability is about integrating social, environmental and economic conditions into our values and operations in a transparent and accountable manner.

Our sustainability strategy and commitments, which are aligned to the principles of the UN Global Compact, will support our strategic priorities, specifically the provision of a safe and sustainable environment, and the engagement, attraction, development and retention of people.

Our strategic priorities are as follows:

- We will continue our evolution into a customer-centric, multidisciplinary consulting, engineering and construction company, making resource allocation decisions across the business lines to benefit the most attractive growth prospects
- We will enhance our value-based engineering offering, helping customers to ensure their projects are economically viable
- We will invest in excellence in our technical and business functions, drive standardisation and follow common policies and procedures throughout the company
- We will invest in information technologies to differentiate our project delivery capabilities and to help us enhance the management of our customers’ assets
- We will improve the engagement of our people and focus on attracting, developing and retaining the best talent
- We will provide a safe and sustainable environment for our people and the communities in which we work

**Our sustainability strategy**

Our sustainability vision is to work with our clients and our supply chain partners to identify opportunities to avoid the consumption of natural resources where more viable sustainable alternatives may be available. Our strategy provides us with the focus for achieving that vision, it ensures that as a business we provide a balance between managing risk and unlocking opportunities that deliver long-term value to our business, our employees and ultimately our customers.
The table below outlines the key areas we incorporate into our strategy:

<table>
<thead>
<tr>
<th>People</th>
<th>Environment</th>
<th>Anti-bribery and Corruption</th>
<th>Community</th>
</tr>
</thead>
<tbody>
<tr>
<td>Diversity and Inclusion</td>
<td>Environmental Management</td>
<td>Code of Business Conduct and Ethics</td>
<td>Educational Partnerships</td>
</tr>
<tr>
<td>Human Rights</td>
<td>Carbon Management</td>
<td>Anti-bribery and Corruption</td>
<td>Strategic Partnerships</td>
</tr>
<tr>
<td>Health and Safety</td>
<td>Resource Efficiency</td>
<td>Supply Chain</td>
<td>Community Investment</td>
</tr>
</tbody>
</table>

Progress monitored through KPI’s and functional strategy and targets

The strategy is focused on three core pillars, the key aims of which are outlined below:

**People**

Investing for tomorrow by developing a diverse, inclusive and talented workforce which exhibits our values and behaviours to drive sustainability.

- We will resource for a diverse and inclusive workforce, introducing new people (both experienced and new entrants) to the resource pools in order to create a business with genuine diversity of thought and backgrounds.

**Innovation**

Delivering innovative technologies, solutions and services that add business value for our customers while minimising environmental impacts.

- We will drive long-term growth for ENGIE Fabricom by developing and encouraging a growing portfolio of innovative environmental technologies, solutions and services which add value to our customers and our business.

**Delivery**

Being a trusted partner by embedding a consistent sustainability standard across our projects.

- Our customers demand high standards, and sustainability is a fundamental part of this. We will ensure a consistent approach to embedding sustainability inherently into the core of our projects. We will implement value-add sustainability framework to be used for those clients with advanced sustainability objectives.
Sustainability impacts, risks and opportunities

As an international business our sustainability impacts are diverse and inextricably linked to the regions in which we operate. We believe that sustainability impact management must be integral to the way in which we manage our business and must be integrated throughout the entire management system. Sustainability related issues are part of our business. We have to ensure we concentrate on those that have the greatest impact on our ability to manage our operations.

We use a number of techniques to do this including:

- Risk management
- Stakeholder engagement
- Sustainability surveys
- Global standards, principles and frameworks

The top five principal business and strategic risks relating to the sustainability of our business are described in the table shown below:

<table>
<thead>
<tr>
<th>Risk</th>
<th>Description</th>
<th>How We Manage The Risk</th>
</tr>
</thead>
<tbody>
<tr>
<td>Health, safety, security and environment</td>
<td>ENGIE Fabricom is involved in activities that have the potential to cause</td>
<td>In order to control risk and prevent harm, we are focused on achieving the highest</td>
</tr>
<tr>
<td></td>
<td>serious injury to personnel or damage to property or the environment and</td>
<td>standards of health, safety and security management. This is achieved through the</td>
</tr>
<tr>
<td></td>
<td>damage to our reputation. These activities may involve operations such as</td>
<td>setting of an effective policy and putting in place clear standards which underpin</td>
</tr>
<tr>
<td></td>
<td>design, construction, commissioning and decommissioning, which have potential</td>
<td>our health, safety, security and environmental management systems.</td>
</tr>
<tr>
<td></td>
<td>to cause serious environmental damage, pollution and habitat destruction.</td>
<td>We have put in place processes to assure our systems work effectively throughout the</td>
</tr>
<tr>
<td></td>
<td></td>
<td>organisation and health and safety performance is regularly reviewed against agreed</td>
</tr>
<tr>
<td></td>
<td></td>
<td>targets to facilitate continual improvement.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>ENGIE Fabricom employs engineering specialists to support projects in implementing</td>
</tr>
<tr>
<td></td>
<td></td>
<td>comprehensive project management planning at all stages of a project. These processes</td>
</tr>
<tr>
<td></td>
<td></td>
<td>are governed by appropriate integrated management systems and are supported by risk</td>
</tr>
<tr>
<td></td>
<td></td>
<td>identification tools aimed at identifying and managing all aspects of project and</td>
</tr>
<tr>
<td></td>
<td></td>
<td>environmental risk.</td>
</tr>
<tr>
<td>Staff recruitment and retention</td>
<td>An inability to attract and retain sufficient high calibre employees could become a barrier to the continued success and growth of ENGIE Fabricom</td>
<td>This risk is mitigated with a clear HR strategy, which is aligned with the business strategy and focused on attracting, developing and retaining the best people for the company with succession planning as appropriate. It is underpinned by an employee framework which describes how we manage our people consistently and we have introduced talent and performance management systems to help us identify and nurture talent. In addition there is a continual review of compensation and benefits to ensure sector and geographic competitiveness and there are localised recruitment teams capable of recruiting large numbers into ENGIE Fabricom. The additional recruitment and attrition challenges being faced as a result of the planned takeover are being mitigated by retention measures.</td>
</tr>
</tbody>
</table>
| Ethical breach | A substantive ethical breach and/or non-compliance with laws or regulations could potentially lead to damage to ENGIE Fabricom’s reputation, fines, prosecution, litigation and claims for compensation. | ENGIE Fabricom has a number of measures in place to mitigate the risk of a substantive ethical breach and/or non-compliance with laws or regulations, including:  
- Embedded policies and procedures  
- Code of business conduct  
- Segregation of duties  
- Management oversight  
- Financial and operational controls  
- Independent whistle-blowing mechanism  
- Appointment of an Ethics Officer  
- Anti-fraud and other internal audits  
- Legal team advice  
- Training programme to support the code of business  
- Conduct and anti-bribery and corruption and competition law  
- Procedures  
- Oversight by ENGIE Group  
- Gifts and hospitality procedure |
<table>
<thead>
<tr>
<th>Project Delivery</th>
<th>Failing to maintain discipline and meeting customer expectations on project delivery could result in damage to reputation, loss of repeat business and potentially lead to litigation and/or claims against ENGIE Fabricom.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>The technical functions provide assurance, drives project execution and supports the development, training and mobilisation of personnel to enhance execution competencies. In addition, the system of applied policies and procedures, combined with comprehensive management oversight, the risk management process, project health checks, internal audit, peer reviews and customer feedback, mitigate the risk to successful project delivery.</td>
</tr>
<tr>
<td>Environmental Consultants</td>
<td>ENGIE Fabricom own/operate facilities and fabrication/manufacturing sites which could have specific environmental consequences requiring specific arrangements, which include protecting the environment and achieving legally enforceable operating parameters. Failure to maintain these standards may result in criminal or civil action and/or financial risk to the business.</td>
</tr>
<tr>
<td></td>
<td>Environmental management systems are in place to monitor and mitigate this risk. Planned preventative maintenance schedules are in place to further mitigate this risk.</td>
</tr>
</tbody>
</table>
6. Modern Slavery and Human Trafficking Statement

This statement is made pursuant to the UK Modern Slavery Act 2015 and sets out the steps that ENGIE Fabricom and its subsidiaries take to prevent modern slavery in our supply chain.

We have recognised the harm that is caused by slavery and human rights violations. This is reflected in our business ethics, and is demonstrated through our long-standing approach to sustainability.

Statement of intent

We have a duty not to be complicit in any form of slavery. We address modern slavery risks from the perspective that ethics and values must drive our actions and behaviours to ensure that we are not complicit in these practices and to contribute to their eradication. Integral to our company values is to always do the right thing, to act ethically and with integrity, and to care about our communities.

ENGIE Fabricom is committed to continually improving and enhancing the systems and processes we have in place to mitigate the risks of human rights violations arising in the context of our operations, including those of our business partners and in our supply chains. We understand that we have a responsibility to be alert to risks in our business and in our wider supply chain, and that this responsibility requires us to act upon any concerns identified.

We have a responsibility to ensure that our own employees, together with the workers in our supply chain, are not victims of slavery, whether it is human trafficking or forced and bonded labour.

ENGIE Fabricom recognises that trust is built upon openness and transparency and commits never to retaliate against or penalise employees, supply chain partners or third parties for making an honest report of potential, suspected or actual breaches of the law, the Code or the Supply Chain Code.

Assessing key risk areas on our projects

ENGIE Fabricom operates in a diversified and complex business arena wherein our relationships with our supply chain and our influence on them differs depending on our relative position in the value chain.

In managing our business and in our execution of projects, we engage with supply chain partners in the following ways:

Directly - where we contract directly with, and can mandate and require our suppliers and subcontractors and their sub-tiers to meet our Supply Chain Code and standards.

Providing Project Management services to our clients - where we manage contractors and other third parties who are contracted by our customers, on their behalf, necessitating a collaborative approach.

Procurement services - where we procure on behalf of our customers, necessitating the need to work closely with our customers to build upon their controls and processes.
Our due diligence procedures help us to identify our risks. Through their application we have identified our greatest risks are likely to be associated with our relationship with third parties - including joint venture partners, subcontractors and those supplying goods, equipment, materials - rather than among our direct employee population.

The engagement or management of subcontractors has been identified as a prominent risk factor for encountering modern slavery for our business. Their use of recruitment agencies and labour brokers and the employment of low-skilled migrant workers in certain geographies are all areas recognised to be high risk in terms of respect for the rights and welfare of workers.

In many instances, we manage these subcontractors on behalf of our customers in a Project Management Consultancy (PMC) capacity. Often with no direct contractual relationship with these subcontractors our efforts have been prioritised to understanding the risks associated with this type of project or where we operate in a joint venture capacity.

**Building responsibly**

We recognise the need for and the value of collaboration within and across sectors and with wider stakeholders to ensure meaningful impact on this issue; it is not an issue any company can solve singlehandedly.

We have undertaken a review of our existing approach to due diligence and the systems we use and, consequent on that, we are implementing a new enhanced solution, which will provide a consistent, company-wide approach looking across a comprehensive set of risks (including modern slavery) in respect of our third-party relationships.
7. **No Child Labour Policy**

**Introduction**

The foundation of this ‘No Child Labour Policy’ is based on the Company’s commitment to find practical, meaningful and culturally appropriate responses to support the elimination of such labour practices. It has been formulated in consideration with the acts. It therefore endorses the need for appropriate initiatives to progressively eliminate these abuses.

**Policy**

ENGIE Fabricom does not employ any person below the age of 18 years at the workplace with the exception of those aged over 16 who are engaged via apprenticeship or traineeship. ENGIE Fabricom prohibits the use of child labour and forced or compulsory labour at all its units. No employee is made to work against his/her will or work as bonded/forced labour, or subject to corporal punishment or coercion of any type related to work.

**Implementation**

This policy is publicly available throughout the Company and clearly communicated to all employees in a manner in which it can be understood through induction programmes and policy manuals. The implementation of the policy is the responsibility of the Company’s human resources department and the relevant location / project security staff, who do not permit minors to enter the facility as workers. There is zero tolerance policy towards its breach. Employment contracts and other records, documenting all relevant details of the employees, including age, are maintained at all units and are open to verification by any authorised personnel or relevant statutory body. The unit provides an annual report to the functional head on any incidents of child or forced labour.

When working in regions / industries with a risk of child labour the Company shall implement suitable controls to review and identify the potential risk and where necessary apply additional controls / measures to prevent child labour within the supply chain. Where there is a known potential for the use of child labour in the manufacture / distribution of any item the Company shall verify that those organisations involved in the supply chain have robust internal processes to prevent the use of child labour including, where applicable on site audit and verification visits.
8. **Counterfeit, Fraudulent and Suspect Items Policy**

At ENGIE Fabricom ethical business is our overriding priority and we regard the cooperation of our supply chain throughout the tiers as essential to maintain the highest standards for all the goods we supply.

We understand the potential risks concerning the supply of Counterfeit, Fraudulent and Suspect Items (CFSI) within the supply chain, and to this end we only choose suppliers that can demonstrate the quality and source of the goods that we require.

All our employees involved in the purchasing of goods have been informed about the potential for CFSI and advised that all goods must be purchased directly from the manufacturers or from agreed and official distribution channels.

**Introduction**

There is a significant risk to product quality from CFSI. To help mitigate this risk, many customers are now requiring suppliers of materials and components to implement processes that aim to prevent, detect and dispose of CFSI.

**Risk Mitigation**

ENGIE Fabricom employs a number of processes during manufacture of materials and components that help prevent, detect and dispose of CFSI. Authorised persons carry out these actions as required.

The chart on page 24 details the mitigation of risk from each step of the process:
<table>
<thead>
<tr>
<th>Section</th>
<th>Description</th>
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| Purchasing          | - Suppliers evaluated and approved in-line with a documented process  
                      - Raw materials are purchased to agreed specifications                                                                                                                                               |
| Goods Inwards       | - Incoming product accompanied by certification, which is checked against original purchase order  
                      - Incoming product inspected for suspect items and validated against purchasing specification in-line with a documented process  
                      - Any non-conformance is raised with the supplier and material rejected if necessary                                                                                                           |
| Storage / Stock     | - Product used for manufacture is stored in accordance with manufacturer’s recommendations, or, where such recommendations do not exist, in accordance with identified best practice                                      |
| Holding             |                                                                                                                                                                                                             |
| Manufacture         | - All products are manufactured onsite using materials from approved suppliers, to approved processes and under closely-monitored conditions  
                      - Product is inspected and any non-conformance is reviewed and material/components rejected if necessary. Examples of points for inspection from International Standards are appearance, inclusions/foreign objects and defects |
| Testing             | - Product is tested to meet the requirements of international standards  
                      - Product identified as non-conforming is isolated, quarantined and disposed of accordingly                                                                                                                                 |
| Goods Outwards      | - All documentation is checked and approved prior to despatch, and product is certified in line with our ISO9001 accreditation                                                                                                                                 |
9. Whistleblowers

ENGIE Fabricom is committed to the highest standards of openness, probity, accountability and high ethical behaviour by helping to foster and maintain an environment where employees and other stakeholders can act appropriately, without fear of reprisal. To maintain these standards, ENGIE Fabricom encourages employees and relevant stakeholders who have material concerns about suspected misconduct or any breach or suspected breach of law or regulation that may adversely impact ENGIE Fabricom, to come forward and report through appropriate channels (in certain cases on a confidential basis) without fear of retribution or unfair treatment.

ENGIE Fabricom conducts its business on the principles of fairness, honesty, openness, decency, integrity and respect. It is the intention of this policy to encourage employees and other relevant stakeholders to report and disclose improper or illegal practices or activities. ENGIE Fabricom is committed to investigate promptly any reported misconduct and to protect those who come forward to report such activities. ENGIE Fabricom assures that all reports shall be treated in strict confidence.

ENGIE Fabricom’s operating procedures are intended to detect and prevent or deter improper activities. However, the best systems of controls may not provide absolute safeguards against irregularities. This policy is intended to investigate and take appropriate action against any reported misconduct or concern.

In each case the person to whom a concern is reported (the “investigating officer”) will:

- Ensure that all matters reported to them are treated confidentially
- Notify an independent board director in case of subsequent complaint regarding the process followed
- Receive and record the concerns reported
- Send a written acknowledgment to the complainant’s home address of the information disclosed
- Ask whether the complainant wishes for their identity to be disclosed and reassure about protection from possible reprisals or victimisation
- Notify the concerns to internal audit
- Ensure that all concerns are properly investigated
- Where appropriate, arranging an initial interview with the complainant to discuss concerns further. This interview will be summarised in writing and you will be given the opportunity to review and approve the summary
- Offer to keep the complainant informed about the progress and outcome of the investigation, where possible
- If concerns relate to criminal activity then the investigating officer is also responsible for reporting the matter to the Police at the appropriate time and the Company will assist wherever possible with any Police investigation
Where appropriate, notify the subject of the allegations that a disclosure has been made and notify them of their right to be represented at any interview. The subject of the allegations will only be notified if this is not detrimental to the investigation and the notification is allowed by law.

Take whatever action is necessary to investigate the concerns in a professional, independent and unbiased manner.

Making a judgement regarding the allegations and produce a written report which will then be passed to relevant senior management for action to be taken where necessary.

**Taking things further**

If, following completion of any investigation, a complainant is not satisfied with the outcome, they can refer the matter to a member of the board.

Alternatively they can seek advice from Public Concern at Work, the independent charity providing free confidential advice on whistleblowing. Public Concern at Work can be contacted by ringing 0207 404 6609. Further information can be found at: http://www.pca.co.uk/

**Sanctions**

The Company recognises that the decision to report a concern can be a difficult one, not least because of the fear of reprisal from those responsible for the malpractice. The Company has a zero tolerance approach to retaliation of any kind against an individual who has raised a concern in good faith.

If an employee is already the subject of disciplinary or redundancy procedures then those procedures will not usually be put on hold as a result of that employee blowing the whistle.

Formal disciplinary action may be taken against any person who breaches the whistleblowing policy by failing to maintain confidentiality.

The Public Interest Disclosure Act (PIDA) 1998 provides protection to whistleblowers, however UK law provides no protection from criminal liability even if an employee may qualify for protection as a whistleblower; prosecutors may still consider a prosecution where an employee has participated in criminal conduct, even if they later report their involvement. Criminal offences may also be committed by whistleblowers who mishandle confidential information even if it is in the course of whistleblowing.

Formal disciplinary action will be taken against anyone who misuses the Whistleblowing procedure and maliciously makes false allegations which he or she knows not to be true.
Our Business Principles

HEALTH & SAFETY
We believe that all undesired incidents can be avoided. Through leadership and expertise we seek to develop a culture that ensures the highest possible level of safety. Our uncompromising approach is that our people must go back home safe and sound after work.

ENVIRONMENT
In carrying out our activities we respect the environment. We strive for sustainable development of our products and services.

QUALITY
We deliver our projects in a controlled, managed way. Our products and services meet the requirements of the customer. Our focus lies on systematic, continuous improvement.

RISK
Risks arising from our activities are identified and controlled in our day-to-day work. In this way we strive for optimum project control.

ETHICS
We stand for honesty, loyalty and trust. We have a culture in which questions of ethics are recognized and are discussed in an open, natural way.

PERSONNEL
Our members of personnel and their competences are our greatest asset. We promote personal development and entrepreneurship. Our members of personnel are committed and loyal, and provide excellent performance. Our HR strategy is aimed at developing our members of personnel, while promoting a culture of leadership and responsibility.

CUSTOMERS
Our relationship with customers is based on mutual respect, honesty and trust. We work together with them in a way that improves our performance while creating added value for our customers and ourselves.

FINANCE
We strive for profit in line with the expectations of our shareholders. We organize ourselves in a consistently profitable way with a view to optimization. Our personnel participate in the financial results of our group.

MARKET & DEVELOPMENT
We understand the developments and movements in the market. We are equipped to provide a wide range of products and services that meet the requirements of our customers. We aim to be one of the leading players in the market.

"DRIVE, COMMITMENT, DARING & COHESION"

Brussels, the 1st of August 2017

Stefaan De Volder
General Manager
International Operations

Wichard Huigen
CEO Onahore
International Operations

Stanley Maas
CEO Offshore
International Operations

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