

# RESPONSIBLE COMMUNICATION

## The EDF Group Guide to Responsible Communication

---

### 1) Our references

EDF has considered the following reference documents to draft its responsible communication policy:

- Consolidated Code of Advertising and Marketing Communication Practice of the International Chamber of Commerce (latest edition, 2011)
- Guide for using ISO 26000 in the communication sector (2012)
- The Responsible Communication Charter drawn up by the Union des Annonceurs (French Advertisers Association) and signed by EDF on 16 January 2018
- The Sustainable Development Recommendation drawn up by the Autorité de Régulation Professionnelle de la Publicité (French Regulator for Advertising) (2016 revised version) and all ARPP recommendations
- All legislation and regulations relevant to the EDF Group's communication and in particular all text governing consultation processes, digital issues and financial disclosure (AMF Code – French Securities regulator)

### 2) Our position

EDF aims to be "the efficient and responsible electricity company, champion in low-carbon growth". This ambition, which is one of our CAP 2030 objectives, positions EDF as a responsible stakeholder of the energy transition. Acting responsibly implies responsible communication. EDF Group's communication therefore must be educational, close to its stakeholders' concerns and substantiated and guided by our public service values.

### 3) Scope

This Guide to Responsible Communication applies to all EDF Group communication departments in France and internationally. It therefore applies to entities in which we have a majority shareholding (EDF Energy, Luminus and Edison) and to French subsidiaries for which we exercise effective control over their communications. This excludes entities such as Enedis and RTE.

Our communications principles apply to all communications disciplines (institutional, internal, brand, financial, recruitment, sales and marketing, and crisis communication) and to all communications: press relations, event marketing, digital, marketing, etc...

### 4) Our five core principles

- a. All communications must be sincere and strive for accuracy and truthfulness. EDF does not issue any information that has not been checked and approved.

- b. We have a responsibility to all of our stakeholders and in particular our customers, employees and shareholders, and for major issues involving our social, corporate and environmental responsibility.
- c. EDF takes responsibility on the fact that a minimum of confidentiality is required concerning its business dealings, patents and relationship with its regulatory authorities to make its communication as clear as possible.
- d. EDF constantly strives to make its communications more professional, so aims to build its communications teams' skills.
- e. Responsible communication should not be approached solely from the ethical angle. It is also a key growth driver for our business.

## 5) Our 50 commitments

- a. EDF's communications must be dignified:
  - i. It must not use any degrading or humiliating images of a person.
  - ii. Any use of a person's image must have been authorised by that person.
  - iii. All communications must factor in the diversity of our company's audiences. No image that might propagate stereotypes on inequalities based on gender, religion or ethnicity may be used, even for humorous purposes.
  - iv. Communications must not propagate ideas that transgress social norms or suggest that violence or high-risk behaviour are acceptable.
  - v. EDF will constantly adapt its advertising and make it accessible to all of its visually - or hearing-impaired audiences, and ensure that all of its buildings that are open to the public are accessible.
- b. EDF constantly strives to make its communication clear and responsible:
  - i. EDF issues only information that it can guarantee to be true, including during a crisis. EDF constantly strives to avoid disseminating contradictory messages to its different audiences (in-house, financial or NGO audiences).
  - ii. EDF commits to making its communications as clear and understandable as possible, in particular in the sales area. It aims to eliminate any jargon or ambiguity from its communications. The same holds for all small-print information in page footers, and intentional omissions.
  - iii. EDF will refrain from indirect communications techniques, for example in the form of fake online consumer reviews.
- c. EDF uses environmentally-friendly communications:
  - i. EDF undertakes to make the Group's communications departments aware of the environmental impact of communication campaigns and will set up environmental assessment indicators for its communications.
  - ii. EDF aims to reduce its use of paper, to use only paper that is certified sustainable, and encourage virtual meetings to curb travel that generates substantial emissions of GHGs.
  - iii. EDF makes its staff aware of the importance of responsible behaviour, whether in the workplace (sorting waste, sending fewer emails, ride sharing) or at home (saving energy and water, etc.).

- iv. EDF does not disparage responsible behaviour or promote non-eco-friendly behaviour, even for humorous purposes. In a broader perspective, in all of its communication, EDF never seeks to propagate ideas of wasting energy, but constantly strives to reduce consumption through significant energy savings.
- d. Supplier relations
- i. If quality and cost are equal, EDF gives precedence to suppliers engaged in CSR initiatives or aligned to our values.
  - ii. EDF is committed to good and fair relations with its external communication partners and in particular:
    - 1. It refrains from any competitive bidding process that is not genuinely open and balanced; it refrains from any competitive bidding process aimed solely at harvesting agencies' ideas.
    - 2. As far as possible, it refrains from any competitive bidding process that places its partners under excessive pressure (on the eve of a weekend, or with overly tight deadlines).
    - 3. In France, where appropriate, and depending on the scope and type of competitive bidding process, EDF will provide compensation for the agencies not selected in the competitive bidding process for national advertising campaigns. This compensation will be announced on the opening of the bidding process.
- e. Sales and marketing communication
- i. EDF must constantly tighten its security measures to keep its customers' data secure.
  - ii. EDF raises customer awareness of data security and phishing threats.
  - iii. EDF refrains from any commercial use of its customers' data (such as selling files) without their explicit consent.
  - iv. EDF refrains from any undeclared product placement for commercial purposes.
  - v. EDF provides an easy solution for anyone receiving emails from the company to request the deletion of their data.
  - vi. EDF refrains from applying a surcharge on telephone numbers for its contacts.
  - vii. EDF constantly strives to improve customer relations and customer request handling, whether they are online users or not.
- f. Press relations
- i. EDF refrains from bribing and from applying any pressure whatsoever on journalists. This includes a ban on business gifts worth over €100.
  - ii. EDF refrains from any retaliatory advertising cuts following a press article not in the EDF Group's favour.
  - iii. EDF refrains from making any proposal concerning the possibility of obtaining editorial content in return for purchasing advertising space.
  - iv. In France EDF is testing the certification of its press releases to guarantee their authenticity.

- g. Communication about hazards or a crisis situation
  - i. EDF informs its customers and all stakeholders of the hazards associated with the crisis.
  - ii. EDF informs all local residents living near its production facilities of the risks incurred and the means of protecting themselves from the hazard/crisis.
  - iii. In a crisis, EDF must give precedence to truth over urgency of the information it disseminates. If it doesn't have the answers yet it must say it doesn't.
  
- h. Stakeholders' feedback and consultation
  - i. EDF strives for considerate communications with the most vulnerable audiences and in particular customers in situations of energy poverty.
  - ii. EDF deploys the most extensive range possible of solutions for listening to its audiences, including regular barometer surveys, satisfaction surveys and meetings of its stakeholder panels or methods appropriate to the country/region.
  - iii. EDF makes every effort to run best practice consultation initiatives to support its building projects. This is directly linked to our six corporate social responsibility objective: Systematically organise dialogue and consultation on our major projects around the world.
  - iv. In France, EDF sets up a scientific committee on communication, made up of recognised academics, to collect research findings once a year on organisations' best practices in communication.
  
- i. Advertising communication
  - i. EDF complies with the spirit and the letter of the recommendation of the local regulator for advertisement on Sustainable Development.
  - ii. In France EDF submits any advertising communications with a sustainable development theme to the French regulator (ARPP) beforehand and undertakes to follow its opinion. It also undertakes to immediately withdraw any advertising campaign that receives a negative opinion from the advertising ethics board.
  
- j. Event-marketing and public relations communications
  - i. Except where EDF is in a partnership with several other stakeholders, the companies of EDF Group apply eco-friendly event planning principles (applicable for examples for transport, site management, energy and water usage, catering, decor items and materials recycling...). In France, EDF follows such principles, as defined by the association "evenementresponsable.fr", (which set up a tool - ADERE tool - to help organising eco-friendly events).
  - ii. EDF leaves decisions about carbon-offsetting initiatives to its business units, but the Group gives precedence to reducing environmental impacts at the source.
  - iii. EDF aims to gradually eliminate from its public relations catalogue all corporate gifts that are not eco-friendly, and give precedence to fair trade items or items that are emblematic of socially responsible or environmentally friendly initiatives.
  - iv. EDF does not distribute plastic bags at events in which the company is involved, and it reduces the distribution of paper brochures and documents.

k. Digital communications

- i. EDF does not use fake accounts and does not buy fake contacts (friends, followers, etc.).
- ii. EDF checks that its digital advertising service providers do not buy advertising space from websites that finance illegal activities.
- iii. EDF makes its employees and service providers aware of the principles of socially responsible digital communications.

l. Internal communications

- i. EDF always strives to ensure that its employees receive in due time information that the media has already disseminated outside the company.
- ii. EDF fosters internal dialogue, in particular through discussion forums, such as the "Parlons Energies" ("Let's talk energy") forum, the VEOL Intranet, chat rooms or face to face meetings. Each country will have local channels it will use to foster dialogue
- iii. EDF strives to educate its staff about certain subjects, to explain the purpose (by disseminating written sets of arguments) and to value human within EDF Group.

6) Monitoring

- a. A system will be set up to monitor responsible communication. It will consist of specific performance indicators included in the EDF Group's overall communication dashboard.
- b. An annual assessment will be carried out. It will be organised by four people: a member from the corporate Communication Division, a regional communication manager, a member from the Sustainable Development Division and a member from outside the company.
- c. The responsible communication principles set out above will be circulated to the entire network of EDF Group communication staff at the annual meeting and explained in detail during half-day workshops.
- d. An online support space will be set up so that all communication staff can find additional resources.
- e. Responsible communication is directly related to corporate social responsibility. Regarding responsible communication, EDF strives to favour actions intended for information and avoids any action that are solely intended for advertising purpose.
- f. A person has been appointed at EDF Communication Division to take in charge Responsible Communication. She will be the contact for any question or help on this matter, in particular for questions about applying this guide:

**Emmanuelle Dumon-Finet**

[emmanuelle.dumon-finet@edf.fr](mailto:emmanuelle.dumon-finet@edf.fr) / +33.(0)6.71.43.39 70