

# Group Policy

## ETHICS & COMPLIANCE POLICY

<b>Applicability</b>	The Group Ethics & Compliance Policy (GECP) applies to all EDF group entities.
<b>Upstream reference</b>	Previous decisions replaced by the GECP
<b>Downstream reference</b>	Instruction memos based on the GECP
<b>Owner</b>	General Secretary
<b>Prepared by</b>	Group Ethics & Compliance Director
<b>Version</b>	Executive Committee 17 May 2016
<b>Application date</b>	May 2016

**GENERAL OBJECTIVES**

EDF's reputation is one of the best in the international energy sector. This reputation can be lost in an instant following an inquiry into the company or its employees.

Over a number of years, EDF has created a body of internal rules that aim to ensure compliance with national and international laws and regulations.

EDF has adopted a Code of Ethics in 2013 that was distributed widely among EDF entities. In addition, the EDF Group Ethics & Compliance Policy (GECP) sets out the rules which executive directors must be familiar and comply with, and which they must ensure compliance with in their entities.

Lack of knowledge or disregard of these rules could expose EDF and its staff to a risk of criminal and civil penalties, the cost of which may be significant and have an irreparable effect on the Group's image.

The GECP supersedes the decisions that feature in Appendix 1. It is supplemented by instruction memos intended to support its implementation within entities.

The rules contained in the GECP define internal control requirements covering ethics and compliance. The implementation of the GECP's rules is subject to the EDF group's monitoring and audit system.

  
**Jean-Bernard Lévy**

**CONTENTS**

<b>GENERAL OBJECTIVES</b>	<b>2</b>
<b>REQUIREMENTS</b>	<b>4</b>
1. ETHICS & COMPLIANCE FUNCTION IN THE EDF GROUP .....	4
1.1. EDF GROUP EXECUTIVE DIRECTORS .....	4
1.2. GROUP ETHICS & COMPLIANCE DIVISION (GECDD).....	4
1.3. ETHICS & COMPLIANCE OFFICER (ECO).....	5
1.4. WHISTLEBLOWING SYSTEM.....	5
2. PREVENTING THE RISK OF CORRUPTION.....	6
2.1. INTEGRITY CHECKS ON BUSINESS RELATIONS.....	6
2.2. RULES GOVERNING GIFTS AND HOSPITALITY.....	7
3. FINANCIAL ETHICS .....	7
3.1. PREVENTION OF MONEY LAUNDERING AND TERRORIST FINANCING RISKS.....	7
3.2. PREVENTION OF MARKET ABUSE.....	7
3.3. COMPLIANCE WITH EMIR .....	8
4. PREVENTING BREACHES OF COMPETITION LAW .....	9
5. PREVENTION OF CONFLICTS OF INTEREST .....	9
6. PROTECTING THE SECURITY OF PERSONAL DATA.....	9
7. COMBATTING FRAUD.....	10
8. COMBATTING HARASSMENT AND DISCRIMINATION.....	10
9. COMPLIANCE WITH INDUSTRY REGULATIONS .....	11
9.1. REMIT.....	11
9.2. CONTROLS ON EXPORTS OF DUAL-USE GOODS .....	11
10. COMPLIANCE WITH INTERNATIONAL SANCTIONS.....	12
<b>OVERSIGHT AND CONTROL SYSTEM</b>	<b>13</b>
<b>HISTORICAL AND CANCELLED DOCUMENTS</b>	<b>14</b>
APPENDIX 1: DECISIONS CANCELLED AND REPLACED BY THE GECDD .....	14
APPENDIX 2: INSTRUCTION MEMOS SUPPORTING THE GECDD .....	14
APPENDIX 3: DEFINITIONS OF KEY TERMS .....	15
APPENDIX 4: MAIN GROUP ENTITIES CONCERNED BY THE GECDD.....	17