



*Human rights and fundamental freedoms, Health and safety,  
Environment and Business ethic: the EDF group's  
commitments and requirements*

March 2021



The EDF group has a longstanding commitment to conducting business in a responsible manner, rooted in respect, solidarity and responsibility, while promoting sustainable solutions for people and the environment.

“To build a net zero energy future with electricity and innovative solutions and services, to help save the planet and drive wellbeing and economic development” is the *raison d’être* that EDF has adopted and enshrined in its articles of association.

Our *raison d’être* is making the EDF group’s CSR architecture more visible and more consistent. It cascades into 4 key topics and 16 major CSR commitments that have encompassed all the Group’s CSR commitments and policies since its General Meeting of 7 May 2020.

In accordance with its *raison d’être*, the EDF group’s CSR architecture is now based on 4 key topics, which in turn cascade into 16 major CSR commitments.

This set of standards compiles the commitments that the EDF group (EDF SA and the companies it controls<sup>1</sup>) has made, and the fundamental requirements relating to its business relations in respect of human rights and fundamental freedoms, protection of the environment, ensuring people’s health and safety, and business ethic.

This document mirrors the EDF group’s CSR commitments and requirements under the French law of 27 March 2017 on the duty of care and business ethic as they stand at the time of its adoption. This set of standards refers to all the public documents or Group policies listed respectively in appendices 1 and 2. It will be reassessed on a regular basis and updated in light of the Group’s strategy.

This set of standards does not detail the way in which these commitments and requirements are implemented. This aspect will be discussed in in-house memorandums or guides.

This document has been discussed with all trade unions in the Group via the Committee for Dialogue on Social Responsibility (CDSR).

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<sup>1</sup> Excluding RTE and Enedis, which manage the electricity transmission and distribution networks, and which are managed independently within the meaning of the French Energy Code.

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## 1. Scope of application

### In the EDF group

The commitments in this document apply to EDF SA's activities and to the activities of all the companies<sup>2</sup> it controls<sup>3</sup>.

### With business relations

The EDF group's commitments also constitute requirements vis-à-vis its business relations under the conditions provided in chapters 3, 4 and 5. The notion of business relations includes suppliers and subcontractors it has established business relationships with, and partners on projects.

In accordance with contractual obligations, repeated failure to comply with these requirements and failure to correct these shortcomings can entail severing business ties.

When EDF holds minority stakes in companies or projects, it assesses the risk of failure to comply with its commitments, informs its partners of its findings, and uses its influence to enforce compliance.

## 2. In practice: the principles for action

The application and enforcement of CSR commitments and requirements are based on principles for action that apply to all EDF group activities. They in particular include:

- Prior evaluation then continuous assessment and management of the impacts and risks relating to human rights and fundamental freedoms, environment, health and safety, and business ethic, arising from the Group's activities and its business relations' activities when their activities are included in the scope of the business relationship.
- Organising transparent two-way dialogue and consultation about all new projects worldwide.
- Mechanisms to record and process whistleblower reports: all individuals potentially impacted by the company's activities are informed of these mechanisms and able to access them, the reports are treated in strict confidence, and in-house whistleblowers (EDF employees and other workers) are protected.

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<sup>2</sup> Excluding RTE and Enedis, which manage the electricity transmission and distribution networks, and which are managed independently within the meaning of the French Energy Code.

<sup>3</sup> In particular through EDF's direct or indirect ownership of the majority of the share capital or voting rights in the governance bodies of the companies.

### 3. Respect for human rights and fundamental freedoms

The commitments in this chapter apply to the EDF group.

They are also requirements for business relations, as provided in chapter 1, with the exception of commitments followed by "\*\*\*".

#### Compliance with international standards

The EDF group tolerates no violations of human rights or fundamental freedoms, in any of its activities, and strives to enforce this principle in all activities carried out by third parties when those activities are included in the scope of the Group's business relationships.

The EDF group is committed to complying, and expects its business relations to comply, as a minimum, with the international standards regarding protection and defence of human rights and fundamental freedoms, in particular including the United Nations International Bill of Human Rights and the International Labour Organization's eight Fundamental Conventions<sup>4</sup>.

If there are inconsistencies between the laws in a host country and these international standards, the EDF group strives to find an approach that conforms to the spirit of the international standards and concurrently complies with the country's laws. \*\*

To ensure respect for human rights and fundamental freedoms in its activities, the EDF group has set up a vigilance mechanism to identify, assess and prevent any risk of violations of these rights and freedoms. This vigilance mechanism complies with the French law on the duty of care and is based on the recommendations in the UN Guiding Principles on Business and Human Rights<sup>5</sup>. \*\*

The EDF group is committed to paying special attention to the impacts of its activities on people considered vulnerable under international human rights law<sup>6</sup>, and requires its business relations to do the same.

The EDF group is committed to investigating, transparently, impartially and in good faith, all claims of violations of human rights or fundamental freedoms relating to the activities carried out by the Group's entities, service providers and subcontractors. \*\*

If a violation of human rights or fundamental freedoms relating its activities is confirmed, the Group will reach out to the victims and/or their representatives with a view to remedying the situation.

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<sup>4</sup> The list of conventions is provided in an appendix to this document.

<sup>5</sup> UN Guiding Principles on Business and Human Rights, HR/PUB/11/04, 2011.

<sup>6</sup> Vulnerable people, groups and communities are those who face a particular risk of exposure to discrimination and violations of their human rights. People who are relegated, marginalised or excluded from society are often especially vulnerable, and international law accordingly grants them specific protection. Examples include children, women, indigenous populations, members of ethnic or other minorities, migrant workers and people with disabilities.



The EDF group is committed to respecting all the internationally recognised human rights below, which represent the salient issues that it has identified in its risk mapping in light of its activities, and requires its business relations to do the same.

## **Employees' rights**

The EDF group is committed to respecting its employees' human rights and fundamental freedoms by complying, as a minimum, with the provisions in the ILO's standards.

### **Fight against discrimination**

The EDF group guarantees equality of treatment for employees and refuses to accept any form of distinction, exclusion or preference on grounds of a person's supposed race, skin colour, sex, age, religious views, political opinions, national background, social background, disability, family situation, sexual orientation or gender identity.

In the countries where it operates and within its own activities, the EDF group is actively involved in efforts to achieve equal access to employment and equal pay for equal work for women and men in the Group, and to building gender balance in its teams at all levels in the company. \*\*

Diversity is encouraged at all levels in work communities and employees must be protected against all forms of discrimination or reprisal.

### **Fight against harassment and violence**

The EDF group tolerates no harassment or violence of any kind at work, or outside work if harassment or violence is linked to relationships that may have been established in the workplace.

The EDF group is committed to fighting against all forms of workplace harassment, sexism and violence, and to protecting its employees from them.

### **Fight against forced labour**

The EDF group rejects all forms of forced labour, as defined in the ILO's Fundamental Conventions.

In particular, on the projects and activities it carries out, the EDF group ensures employees give their free and informed consent before carrying out their duties.

The EDF group in particular ensures that intermediaries and employment agencies do not resort to practices that may entail forced labour.

The EDF group is committed to never impeding the free movement of workers. In particular, the Group shall not confiscate workers' travel documents, identity documents or any other personal item.



## **Fight against child labour**

The EDF group rejects all forms of child labour, as defined in the ILO's Fundamental Conventions.

The EDF group shall not employ anyone under age 15 (barring exceptions provided in ILO Convention 138) and shall not employ anyone under age 18 for work considered hazardous in said Convention.

## **Respect for freedom of association and the right to collective bargaining**

The EDF group respects freedom of association and the right to collective bargaining, as defined by the ILO.

The EDF group acknowledges that all employees are free to establish and/or join the worker organisation of their choice and does not interfere with this right.

The EDF group shall not in any way threaten, harass, punish or discriminate employees on account of their trade union activities, and does not discourage them from joining the organisations of their choice.

The EDF group respects the right to collective bargaining and the role of worker organisations in related talks.

## **Ensuring fair and favourable working conditions**

The EDF group strives to comply with the ILO's standards related to working hours based on the following principles, barring exceptions mentioned by the ILO:

- Regular working weeks do not exceed 48 hours.
- Working weeks do not exceed 60 hours including overtime.
- Workers have at least 1 day off every 7 working days, except in the event of emergencies or other uncommon circumstances.
- Workers have at least 3 weeks of paid leave each working year.
- Maternity leave lasts at least 14 weeks.

The EDF group strives to comply with the ILO's standards related to compensation and fringe benefits.

The EDF group is committed to paying decent wages enabling employees and their family to meet their basic needs, and to providing all its employees with adequate welfare protection.

The EDF group ensures that all the employees it houses live in decent conditions meeting ILO standards.





## **Rights of local communities**

The EDF group is committed to never impairing the rights of the communities living around its operations.

The EDF group is committed to organising transparent two-way dialogue and consultation about all new projects worldwide.

The EDF group acknowledges the role of human-rights and environmental advocates, and shall not prevent them from exercising their rights. The Group strives to identify the risks arising from its activities and affecting human-rights and environmental advocates, and to enable said advocates to freely carry out their duties.

The EDF group identifies the risks pertaining to local communities' health, living conditions and environment on all its projects, in light of the International Finance Corporation (World Bank Group) Performance Standards, and offers to take suitable measures to address them.

## **Respect for the rights of indigenous populations**

The EDF group is committed to respecting the rights and distinctive features of indigenous populations as defined in the UN Declaration on the Rights of Indigenous Peoples (UNDRIP) and ILO Convention 169. The UNDRIP in particular stipulates that "Indigenous peoples shall not be forcibly removed from their lands or territories. No relocation shall take place without the free, prior and informed consent of the indigenous peoples concerned and after agreement on just and fair compensation."

## **Restoration of livelihoods, at least to pre-project conditions**

In cases where its activity threatens or affects a community's livelihood, the EDF group is committed to providing compensation and/or restoring livelihoods, at least to the conditions preceding its work.

## **Respect for cultural heritage**

The EDF group is committed to protecting and safeguarding, with the affected populations' agreement, the cultural, religious and other heritage on the land it uses for its activity.

## **Use of security forces**

The EDF group is committed to the security of its employees and facilities, in strict accordance with human rights including the rights of local communities.

## 4. Environmental protection

The commitments in this chapter apply to the EDF group.

In all the matters covered in this chapter, the EDF group requires its business relations, as defined in chapter 1, to comply with the local and national rules that apply to the activities they carry out together.

When the applicable rules differ from international best practices<sup>7</sup>, the Groupe shall inform its business relations of the latter and encourage them to apply them.

To prevent and mitigate risks of serious harm to the environment, the EDF group relies on its Ethics Charter and Sustainable Development Policy. They require its entities to act responsibly and develop technology that respects the environment.

### Fight against climate change

The EDF group is aiming for carbon neutrality by 2050. This involves achieving virtually zero direct emissions, reducing indirect emissions as significantly as possible within the framework of national policies and offsetting residual emissions through negative-emission projects.

The EDF group is committed to reducing its greenhouse gas emissions by 2030, by doing better than the requirements than the 2°C trajectory requirements established by the Paris Agreement. This trajectory has been approved under the Science-Based Targets initiative.

The EDF group is committed to developing renewable energies in France and worldwide, and to phasing out coal-fired electricity generation by 2030 in all its geographies.

The EDF group is rolling out a strategy to adapt its activities in light of the impacts of climate change. This strategy is two-pronged: it involves adapting existing installations to make them more resilient to extreme weather events, and incorporating changes in the climate into the design of new installations (in particular those with lifespans of over 40 years such as hydropower dams and nuclear power plants).

The EDF group is committed to continuously improving its reports relating to climate risks by following the recommendations of the G20 Task Force on Climate-related Financial Disclosures (TCFD). It has in particular appointed two Climate correspondents, to the Group's Executive Committee and its Board of Directors.

The EDF group is contributing to decarbonising economies by supporting the shift towards more electric power, developing smart cities and energy services, investing in innovation, research and development, raising stakeholder awareness of climate change, and working for climate-friendly laws.

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<sup>7</sup> Good International Industry Practice encompasses the practices expected from a competent and experienced industrial company in activities and contexts resembling those that the EDF group and its business relations might encounter. They are notably based on the International Finance Corporation's Performance Standards, the OECD Guidelines for Multinational Enterprises, the Equator Principles for private banks and industry-specific guides such as the International Hydropower Association's Hydropower Sustainability Guidelines.



The EDF group ensures its employees are aware of the causes and consequences of climate disruption and has committed, in particular, to rolling out a collective intelligence tool, called a Fresque du Climat (“climate fresco”) to its 165,000 employees by end-2022.

## Preventing pollution and disturbances

The EDF group is committed to controlling, supervising and analysing the gas and liquid emissions from its activities, and to limiting those emissions as much as reasonably practicable.

The EDF group is committed to using systems and processes to limit sources of waste, as part of its broader drive to optimise its industrial production processes.

To do that, the EDF group is committed to using the best available techniques (BATs) within a reasonable cost range.

Likewise, the EDF group pledges, whenever the technical and economic conditions are acceptable, to:

- Limit visual impacts by blending its buildings and structures into the surrounding landscape; and
- Manage unpleasant smells and noise near its industrial installations.

The EDF group is committed to allocating resources to preventing the risks of pollution and disturbances, by replacing hazardous substances with alternative products that are less harmful to human health and the environment, whenever doing so is technically and economically acceptable.

## Biodiversity conservation

The EDF group is committed to doing its utmost to limit its activities’ pressure on biodiversity and to avoid adversely affecting biodiversity. When this is not possible, the Group shall reduce its impact as much as possible and take suitable measure to offset the impacts.

The EDF group has made these commitments in two external initiatives: act4nature France and act4nature International. The pledges are based on 3 pillars:

- Reducing the impact of its activities by striving to minimise the major pressure factors identified by the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services in its May 2019 report:
  - Limit changes in land and sea use (which includes limiting deforestation, and land and water habitat fragmentation);
  - Limit overexploitation of resources (which includes limiting consumption of wood, water and the raw materials the Group uses);
  - Curb climate change;
  - Limit pollution;
  - Limit development of invasive alien species.
- Advancing scientific knowledge about biodiversity and sharing it.



- Reinforcing employee and public awareness of biodiversity-related issues.

## Resource optimisation

The EDF group is committed, within the scope of its activities, to rolling out a plan to optimise use of resources aimed at avoiding wastage and fostering the circular economy over the entire lifecycle of its installations and operations.

The EDF group is committed to regularly quantifying, setting objectives, monitoring progress and reducing consumption of fossil fuels, electricity, water, hazardous substances and natural resources, through conservation, reuse and recycling.

## Hazardous and non-hazardous waste management, recycling and lifecycle analysis

The EDF group is committed to limiting conventional waste production and to recycling it. It is also aiming to recover 90% of the waste the Group as a whole produces by end-2021.

The EDF group is committed to monitoring, controlling and treating wastewater and solid waste from its operations before releasing them.

The EDF group is committed to managing and treating hazardous waste to render it non-hazardous, and to ensuring it is certified as such under applicable regulation. Chemicals and other substances that can harm natural environments in the event of a spillage must be listed and managed in such a way as to ensure safety at all stages, i.e. during handling, in transport, in storage, and during recycling, reuse or disposal.

The EDF group is committed to handling its radioactive waste and transporting it from nuclear generation plants to long-term storage facilities in compliance with applicable regulation, and in particular according to the provisions in the Plan National de Gestion de Matières et Déchets Radioactifs (national plan for radioactive waste and material management) in the case of France.

The EDF group is committed to limiting waste production at source, and to sorting, packaging, storing and transporting waste safely until it is disposed of in the appropriate long-term facilities.

EDF is committed to playing a role in nuclear installation dismantling and waste management, at its own industrial plants and third-party plants.

## 5. Health and safety

The EDF group has enshrined these commitments in its Health and Safety policy and Global CSR Agreement (article 5). Its aim is to become a benchmark in this field.

The EDF group is committed to providing a safe working environment for all its employees and its subcontractors' employees. This specific commitment to providing a safe working environment is also one of the requirements for the EDF group's business relations, as provided in chapter 1.

Eradicating fatal accidents is one of the EDF group's priorities. It intends to do so with effective safety systems based on three fundamental rights relating to workplace health and safety:

- The right to be informed of workplace risks and to suitable education and training in safe working methods;
- The right to refuse work or stop work in the face of a serious and imminent threat;
- The right to take an active part in conversations and programmes aimed at improving workplace health and safety, including the possibility of setting up health and safety committees in all Group workplaces.

The EDF group follows its Health and Safety policy, which applies in all Group companies, in accordance with host country legislation. This policy is based on the ILO's standards, the European Framework Directive on Safety and Health at Work (Directive 89/391 EEC) and managerial best practices in large industrial groups.

Beyond zero accidents, the company is aiming for a higher goal: general health, encompassing employees' physical and mental health, and all-round health protection.

### Preventing workplace accidents

The EDF group is committed to instilling a safety culture aimed at zero fatal accidents and, in time, zero accidents.

The EDF group is committed to ensuring all its employees are trained, certified and regularly reminded of the risks inherent in their work and the appropriate ways of preventing those risks.

The EDF group is committed to the widespread use of participatory systems to gather information about and analyse all dangerous situations, near-accidents and accidents.

The EDF group is committed to showing the same consideration for subcontractors' and service providers' employees working on Group premises, and to ensuring they follow all the rules that apply to them and receive as much attention as Group employees in matters relating to health and safety.

The EDF group is committed to supplying the collective and personal protective equipment that its employees need to work safely. It ensures safety procedures are followed, including the use of mandatory personal protective equipment.



## **Employee health**

The EDF group is committed to identifying situations entailing risks and to taking action to prevent musculoskeletal, anxiety-related and depression-related disorders.

To this end, the EDF group is committed to raising all its employees' awareness of psycho-social risks in order to identify and forestall them, and to encouraging employee to report concerns relating to their own situation or that of their coworkers if necessary.

The EDF group is committed to stepping up prevention of addictions by using tools to raise awareness and by testing for the use of illicit drugs in accordance with applicable legislation.

## **Preventing toxic hazards for employees (substance inhalation, etc.)**

The EDF group strives to evaluate risks and select the least hazardous chemicals accordingly through its Purchasing policy.

The EDF group takes measures to avoid employee exposure to these substances.

It also protects the employees it identifies as being at risk of exposure in accordance with applicable regulation, by providing collective and personal protective equipment and by training them.

## **Preventing toxic hazards for the public**

The EDF group minimises the health risks that might affect the public through its safety policy and by monitoring waste and effluents in order to ensure it keeps any potential impacts under control.

## **Preventing road risks**

The EDF group ensures its employees follow local traffic regulations.

The EDF group's Essential Rules include several issues relating to road risks (wearing seatbelts, driving withing speed limits, not driving under the influence of alcohol or drugs, not using a telephone while driving).

The EDF group ensures the vehicles it supplies for its employees are properly serviced and maintained.

The EDF group prepare schedules allowing enough travel time to keep users safe.

The EDF group is committed to providing drivers and operators with the information and training they require, and to holding them accountable as regards compliance with the applicable requirements.



## Industrial safety

### *Nuclear safety*

When they operate a nuclear plant, EDF group companies are responsible for nuclear safety and reassert the fact that preventing nuclear accidents and limiting their consequences should they occur are EDF's absolute priorities.

The EDF group's approach stems from the International Atomic Energy Agency's principles and the Group has its own Nuclear Safety policy based on them. The Group also works closely alongside its industrial partners on these matters.

The EDF group is committed to taking into account, from the design stage, the risks and drawbacks that might arise during the operation of the power plants, whether relating to the actual operation of the facilities or to internal or external attacks. Even though EDF is constantly working to avoid any risk of accidents, it has considered the possibility of one occurring with a view to limiting its consequences regarding human health and safety. The Group's companies, in other words, have an efficient and effective organisation to deal with a crisis.

The EDF group's approach to safety is based both on compliance with strict operating rules and on the technical crews' cautious and inquisitive attitude, which results from establishing a genuine safety culture.

The EDF group is committed to high-quality dialogue with its employees and their representatives, subcontractors, supervisory authorities, local communities and all other stakeholders in nuclear safety.

The EDF group has embarked on a continuous improvement process based on numerous controls, both internal and external.

### *Hydropower safety*

The EDF group is committed to protecting the people and property near its hydropower plants from the risks and disturbances resulting from the plants' operation.

The EDF group strives to ensure plant integrity at all times, and enlists its engineering capabilities to maintain and upgrade these facilities.

The EDF group constantly assesses the risks and strives to provide solutions that accommodate other uses of the river, and to constantly improve them.

### *Other production capacity*

The EDF group strives to protect the people and property near its other conventional fossil-fired, wind, photovoltaic and other production facilities from the risks and disturbances resulting from their operation.

The EDF group is committed to regular dialogue with its employees and their representatives, subcontractors and local communities, and to including its industrial partners in these conversations.

## 6. Ethical behaviour and compliance

The commitments in this chapter apply to the EDF group.

The EDF group promotes a culture of integrity and applies a zero-tolerance policy towards fraud and corruption. Ethical conduct is therefore the absolute rule for all Group employees around the world, at all levels of the organisation. It also conducts business integrity checks before entering into any business relationships.

### Preventing the risk of corruption and influence peddling

The EDF group is committed to preventing corruption in all its forms.

To do so, EDF has set up an anti-corruption programme encompassing:

- A mechanism to prevent corruption and influence peddling in accordance with the French law of 9 December 2016 on transparency, the fight against corruption and the modernisation of the economy, known as the "Sapin 2" Law;
- A training programme for all its employees exposed to the risk of corruption.

All EDF group employees shall decline any bribe or other advantage offered in the hope of influencing a business decision, and any facilitating payments. Breach of any of these rules may result in disciplinary sanctions.

### Integrity checks on business relations

The EDF group is committed to only working with business relations that comply with the rules of integrity and the values upheld by the Group, and to conducting integrity checks before entering into a business relation with a new partner.

The EDF group ensures that the decision to work with a business relation meets a need for skills or resources that are not available in the Group, and is subject to a specific, clearly-defined and fixed-term assignment, giving rise to justifiable and proportionate remuneration.

The EDF group sets up a monitoring and reporting system for the term of the relationship with a business relation enabling it, if warranted and in accordance with contract stipulations, to terminate the relationship immediately if the partner fails to comply with EDF group values and rules of integrity.

### Gifts and hospitality

The EDF group is committed to limiting gifts and hospitality given or received, in order to protect itself against any attempt at corruption.

The EDF group shall not offer or accept gifts with a view to obtaining an undue advantage or anything else in return.





## Preventing conflicts of interest

The EDF group is committed to preventing, detecting and addressing conflicts of interests.

EDF group employees must inform their line manager of any potential conflict of interest as soon as possible, in order to address it. In a professional situation, EDF group employees must always make decisions with EDF's interest in mind, never on the basis of their own personal interest.

EDF group employees must not exert pressure regarding the employment, performance assessment or remuneration of a friend or relative, or do anything to influence the award of a contract to an entity in which they or someone close to them has an interest.

## Anti-fraud policy

The EDF group is committed to fighting against all forms of fraud.

All EDF group employees must conform to the law and internal procedures, contribute to developing and implementing rigorous practices aimed at preventing any wrongdoing.

## Sponsorship

The EDF group is committed to specifying its sponsorship operations' scope, action principles and the topics it considers eligible for partnerships.

The EDF group shall not favour or become involved in sponsorship operations with intent to influence a decision or secure an undue advantage.

The EDF group is committed to verifying the integrity of its sponsorship operations' beneficiaries.

## Interest representation

The EDF group is committed to carrying out all its endeavours involving interest representation in a completely transparent manner and based on reliable, verified and up-to-date information.

The EDF group is committed to complying with the laws, regulations and international conventions governing lobbying in the country where it is carried out, and to complying with the codes of ethics of the organisations it targets.

The EDF group shall not attempt to influence a public official's position by offering an undue advantage or encourage them to breach their organisation's ethical rules.

## **Preventing market abuse**

The EDF group is committed to avoiding market abuse by complying with the principles and regulations in force, and with the recommendations issued by market authorities, and expects its business relations to do likewise.

EDF group employees must not use or disclose inside or sensitive information with a view to deriving any benefit from it or enabling someone else to do so.

## **Preventing money laundering and the financing of terrorism**

The EDF group is committed to preventing the risk of money laundering and the financing of terrorism.

The EDF group is committed to understanding all it can about its business relations, in order to identify the end beneficiary of its financing or services, and thereby ensure that its activities are never used to “launder” the proceeds of criminal activities or to finance terrorism-linked activities directly or indirectly.

The EDF group is committed to establishing a monitoring and reporting system relative, in particular, to atypical or suspect operations, the transfer of funds from or to high-risk geographical regions, and operations or activities that require cash payments.

## **Preventing violations of competition law**

The EDF group is committed to preventing violations of competition law and to never make agreements with competitors with a view to distorting competition in a market.

The EDF group is committed to defining objective, transparent and non-discriminatory criteria for the award of contracts.

The EDF group shall not seek to obtain a competitive advantage by resorting to illegal or unfair practices.

## **Compliance with international sanctions and controls on international trade**

The EDF group is committed to verifying, prior to any undertaking, that the intended business relation and transaction are not on any international sanction lists, and to ensuring that the nature of the product or service it exports, its destination, its end user and its end use are genuine.

The EDF group is committed to obtaining from the competent authorities any prior authorisation required to export or transfer technology, software or goods that may have a dual civil or military use.



## Tax policy

The EDF group is committed to never carrying out or proposing operations principally for tax-related purposes or artificial optimisation schemes principally for tax-related purposes.

Regarding non-cooperative tax jurisdictions or “tax havens”:

- The EDF group pledges not to set up legal implantations (companies, branches or other entities) in non-cooperative states or territories which are not determined by reasons relating to economic activity;

The EDF group pledges not to carry out operations in or route financial flows through these jurisdictions principally for tax-related purposes.

## 7. The whistleblowing mechanism

The EDF group does not tolerate any form of retaliation against a person who in good faith and selflessly reports deeds that contravene the commitments and requirements in this document.

The EDF group is committed to providing a whistleblowing mechanism for:

- All Group employees, external employees or occasional workers, enabling them to report violations of laws and regulations, crimes and offences, failure to comply with the Code of Conduct, violation of an international undertaking ratified by France, or a threat or serious harm to the general interest;
- Third parties to report any risk of serious violations of human rights and individual freedoms, or harm to the environment, health and safety arising from the Group’s activities.

The EDF group guarantees that the facts reported, the identity of the whistleblower as well as that of any person reported, will be treated in the strictest confidence, and that personal data will be protected in accordance with the General Data Protection Regulation.

SIGNATURE

English translation filed in French signed by Jean-Bernard Levy, Chairman and CEO of EDF

## APPENDICES

### Appendix 1: The main international treaties protecting and defending human rights

1. United Nations International Bill of Human Rights: Universal Declaration of Human Rights (1948), International Covenant on Civil and Political Rights (1966) and International Covenant on Economic, Social and Cultural Rights (1966)
2. International Labour Organization Fundamental Conventions:
  1. Forced Labour Convention, 1930 (No. 29), Abolition of Forced Labour Convention, 1957 (No. 105)
  2. Minimum Age Convention, 1973 (No. 138), Worst Forms of Child Labour Convention, 1999 (No. 182)
  3. Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87), Right to Organise and Collective Bargaining Convention, 1949 (No. 98)
  4. Equal Remuneration Convention, 1951 (No. 100), Discrimination (Employment and Occupation) Convention, 1958 (No. 111)
3. Other International Labour Organization conventions and recommendations:
  1. Violence and Harassment Convention, 2019 (No. 190).
  2. Hours of work:
    1. Hours of Work (Industry) Convention, 1919 (No. 1)
    2. Hours of Work (Commerce and Offices) Convention, 1930 (No. 30), Forty-Hour Week Convention, 1935 (No. 47)
    3. Reduction of Hours of Work Recommendation, 1962 (No. 116)
    4. Weekly Rest (Industry) Convention, 1921 (No. 14)
    5. Weekly Rest (Commerce and Offices) Convention, 1957 (No. 106)
    6. Holidays with Pay Convention (Revised), 1970 (No. 132)
    7. Night Work Convention, 1990 (No. 171)
    8. Part-Time Work Convention, 1994 (No. 175)
    9. Maternity Protection Convention, 2000 (No. 183)
  3. Remuneration:
    1. Protection of Wages Convention, 1949 (No. 95)
    2. Minimum Wage Fixing Convention, 1970 (No. 131)
    3. Equal Remuneration Convention, 1951 (No. 100)
  4. Workers' Housing Recommendation, 1961 (No. 115)

## Appendix 2: EDF texts enshrining the commitments in this document

### 1. Public

- CAP 2030, EDF, 2015
- EDF's UN Global Compact renewal letter, 2019, <http://www.globalcompact-france.org/p-125-club-droits-humains>
- WBCSD's CEO Guide to Human Rights, 2019, <https://humanrights.wbcsd.org/>, [https://docs.wbcsd.org/2020/10/WBCSD\\_CEO\\_Guide\\_to\\_Human\\_Rights.pdf](https://docs.wbcsd.org/2020/10/WBCSD_CEO_Guide_to_Human_Rights.pdf)
- EDF's CSR Goals, 2016
- EDF's Global CSR Agreement, 2018
- EDF's *raison d'être* and commitments, 2020
- EDF's Ethics Charter, 2019
- EDF's Ethics and Compliance Code of Conduct, 2018
- EDF's Ethics and Compliance Programme, <https://www.edf.fr/en/the-edf-group/our-commitments/ethics-compliance/ethics-and-compliance-programme>
- Pledges: act4nature International 2020, <http://www.act4nature.com/wp-content/uploads/2020/06/EDF-VF-28-05.pdf>, *Entreprises engagées pour la nature*, act4nature France, led by the Office Français pour la Biodiversité, Business Ambition for 1.5°C (2020)
- EDF's Universal Registration Document and Vigilance Plan (*updated yearly*)
- EDF's Corporate Responsibility Goals, 2016, <https://www.edf.fr/en/the-edf-group/taking-action-as-a-responsible-company/our-six-corporate-responsibility-goals>
- The [www.edf.fr](http://www.edf.fr) website

### 2. Group policies

The Group policies below contain requirements relating to some of the commitments in this document:

- Sustainable Development policy
- Nuclear Safety policy
- Health and Safety policy
- Purchasing policy
- Ethics and Compliance policy
- Instruction note on Integrity checks on business relations
- Instruction note on Combating fraud
- Tax policy