



# Vigilance Plan 2022



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# Introduction

French Act on the Duty of Vigilance of parent companies and ordering companies introduced the obligation to draw up and implement a Vigilance Plan<sup>1</sup>.

This plan must include “reasonable vigilance measures to identify risks and prevent serious violations of human rights and fundamental freedoms, the health and safety of individuals, and the environment” that may result from the activities of the company and its controlled subsidiaries, as well as those of suppliers or subcontractors with whom it has an established business relationship, when these activities are tied to that relationship.

It must also include five measures:

1

Risk mapping

2

Procedures for regular evaluation

3

Appropriate risk mitigation actions

4

Whistleblowing system

5

System for monitoring the measures implemented

1. Act No. 2017-399 of 27 March 2017, Article L. 225- 102-4 of the French Commercial Code.









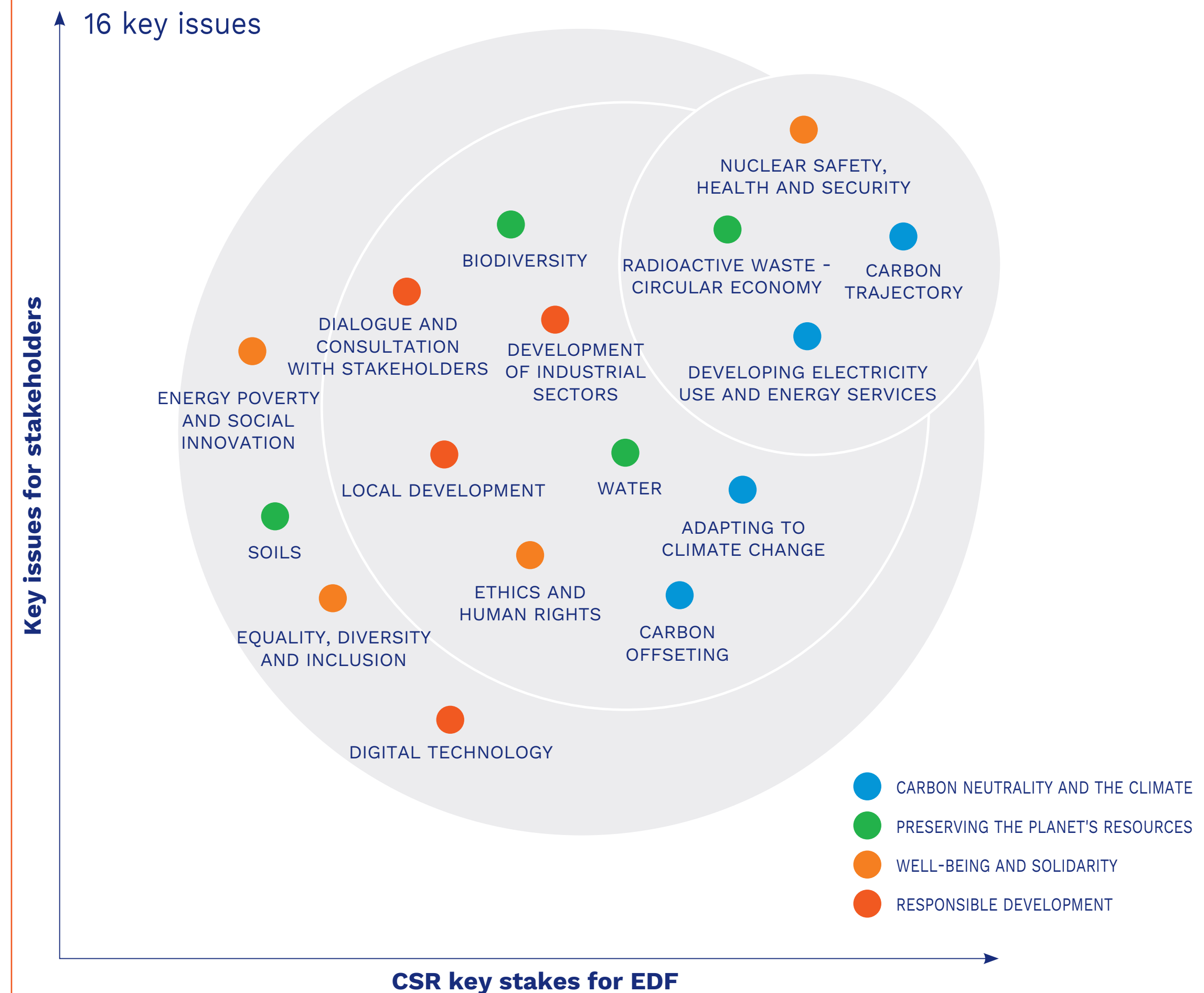
# Raison d’être and CSR commitments

EDF has a long track record of running a responsible business, based on the values of respect, solidarity and responsibility, promoting sustainable solutions for individuals and the environment.

EDF’s raison d’être has been modified to read **“To build a net zero energy future with electricity and innovative solutions and services, to help save the planet and drive well-being and economic development”** and this statement was added to its articles of association at the General Shareholders Meeting held on 7 May 2020. The Group’s raison d’être is broken down into **16 CSR commitments**<sup>2</sup>, which are ranked and grouped into four key issues:

- CARBON AND CLIMATE NEUTRALITY,
- PRESERVING THE PLANET’S RESOURCES,
- WELL-BEING AND SOLIDARITY,
- RESPONSIBLE DEVELOPMENT OF THE EDF GROUP’S ACTIVITIES.

EDF GROUP’S DUAL MATERIALITY MATRIX



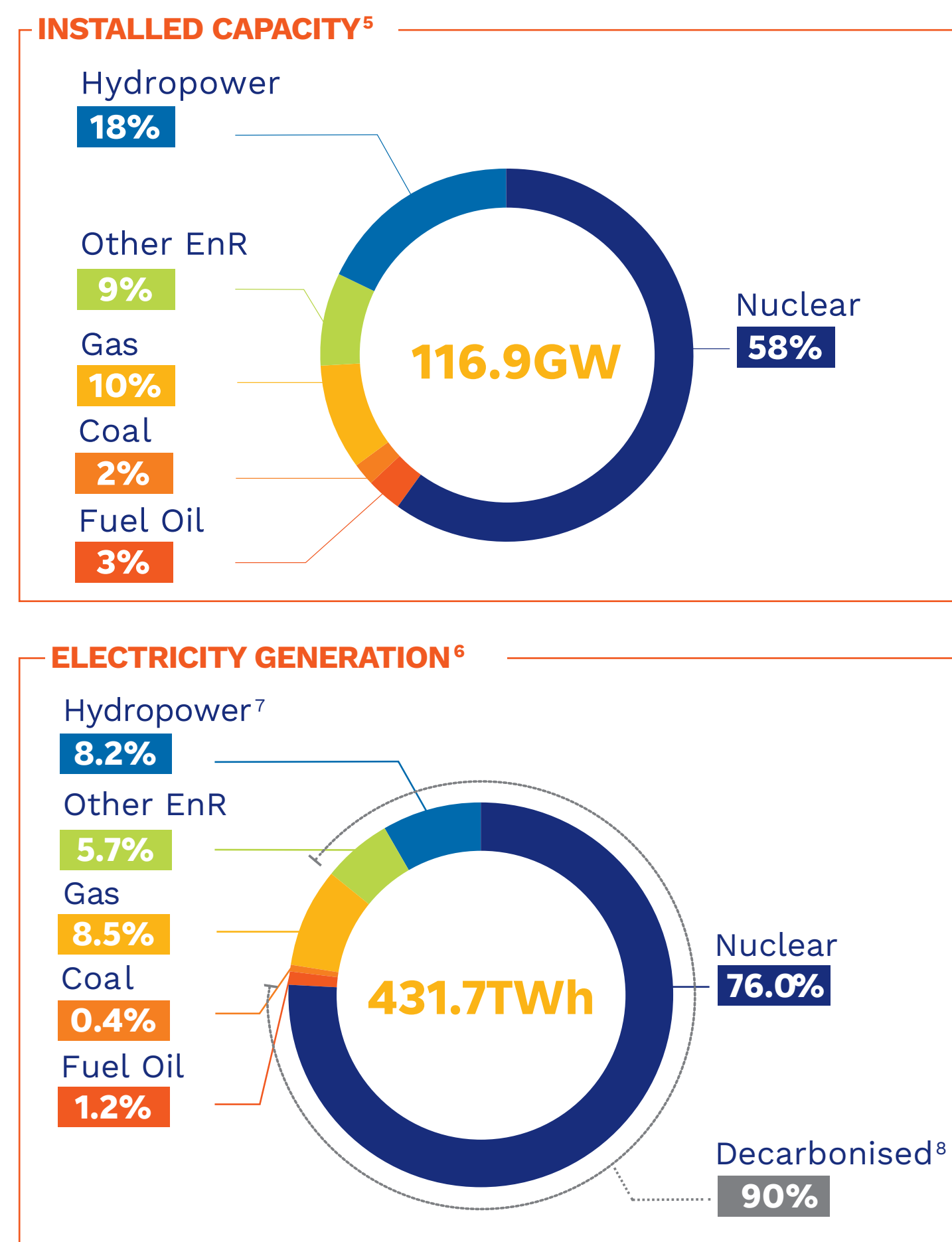
<sup>2</sup>. Corporate Social Responsibility.



# Key figures 2022



3. Consolidated scope. Counted per site.  
4. FTEs (full-time equivalent) at Group level.  
5. Consolidated data.  
6. Consolidated data.  
7. Hydro output including pumped storage consumption and sea energy.  
8. Direct output-related CO<sub>2</sub> emissions, excluding life-cycle analysis (LCA) of fuel and production means.





# Priorities of the CAP 2030 strategy

The CAP 2030 strategy sets out EDF’s raison d’être: *“To build a net zero energy future with electricity and innovative solutions and services, to help save the planet and drive well-being and economic development.”*

The EDF group produces some of the least carbon-intensive electricity in the world. In 2020, it made further commitments to reduce its greenhouse gas emissions by 2030, which have been validated by the Science Based Targets Initiatives as exceeding the 2°C ambition of the Paris Agreement.

For the first time, the EDF group has set targets covering not only its direct emissions, but also its indirect emissions. **The aim is to adopt a trajectory whereby the Group contributes to achieving carbon neutrality for its entire carbon footprint by 2050.** By 2030, the EDF group aims to reduce its direct emissions (scope 1) by 50% compared to the 2017 level of emissions and to reduce its scope 3 emissions by 28% compared to 2019.

For EDF, the fight against climate change is based on energy decarbonisation, energy efficiency and reduced energy consumption, as a means of lowering the carbon intensity of its customers’ energy uses. **The Group’s strategy is structured around three strategic priorities, which are described in the CAP 2030 strategy.**





# The Group’s framework relating to its commitments and requirements with respect to the environment, human rights, and health and safety

EDF’s Vigilance Plan was determined within the framework of the UN Guiding Principles on Business and Human Rights, OECD Guiding Principles, the fundamental conventions of the International Labour Organisation and UN International Bill of Human Rights.

In this context, the Group has published on its website its Duty of Vigilance standards in a document entitled “*Human rights and fundamental freedoms, Health and safety, Environment, and Business ethics: the EDF group’s commitments and requirements*”. This set of standards brings together the commitments and requirements of the EDF group (EDF and the companies it controls) and the fundamental requirements with regard to its business relationships in terms of respect for human rights and fundamental freedoms, environmental protection, guaranteeing the health and safety of individuals, and business ethics.

This set of standards refers to all the Group’s public documents and internal policies.

 **Access the “Human rights and fundamental freedoms, Health and safety, Environment, and Business ethics: the EDF group’s commitments and requirements”**

Mandatory Group procedures binding on all controlled entities <sup>9</sup>	Internal documents made public	External sources
<ul style="list-style-type: none"><li>• Risk management and internal control</li><li>• Governance of subsidiaries and holdings</li><li>• Project management</li><li>• Ethics and compliance</li><li>• CSR</li><li>• Health and safety</li><li>• Procurement</li></ul>	<ul style="list-style-type: none"><li>• Ethics Charter</li><li>• Code of conduct Ethics and Compliance</li><li>• Sustainable Development Charter for Suppliers</li><li>• Global Framework Agreement on Corporate Social Responsibility</li></ul>	<ul style="list-style-type: none"><li>• UN Global Compact</li><li>• UN Guiding Principles on Business and Human Rights</li><li>• OECD Guidelines for Multinational Enterprises</li><li>• WBCSD<sup>10</sup> CEO Guide to Human Rights</li><li>• Conventions of the International Labour Organisation (ILO) guaranteeing fundamental principles and rights at work and combatting for the elimination of discrimination</li><li>• Declaration on the Rights of the Child</li><li>• Declaration on the Elimination of All Forms of Discrimination against Women</li><li>• Global Reporting Initiative (GRI)</li><li>• Supplier Relations and Responsible Procurement Label (RF&amp;AR)</li></ul>

9. In compliance with the principle of the independent management of the operator of regulated infrastructures.  
10. World Business Council for Sustainable Development.



# Vigilance plan governance and steering

EDF has strengthened its oversight of the Vigilance Plan with the appointment, in December 2020, of a Group Duty of Vigilance Compliance Officer by two members of the Executive Committee: the Group Corporate Secretary and the Group Executive Director in charge of Innovation, Corporate Responsibility and Strategy.

This officer is responsible for the development, deployment and coordination of the vigilance plan and its application within the Group. The Vigilance Plan is designed and managed in collaboration with the Legal Department and the Impact Department.

## Governance level

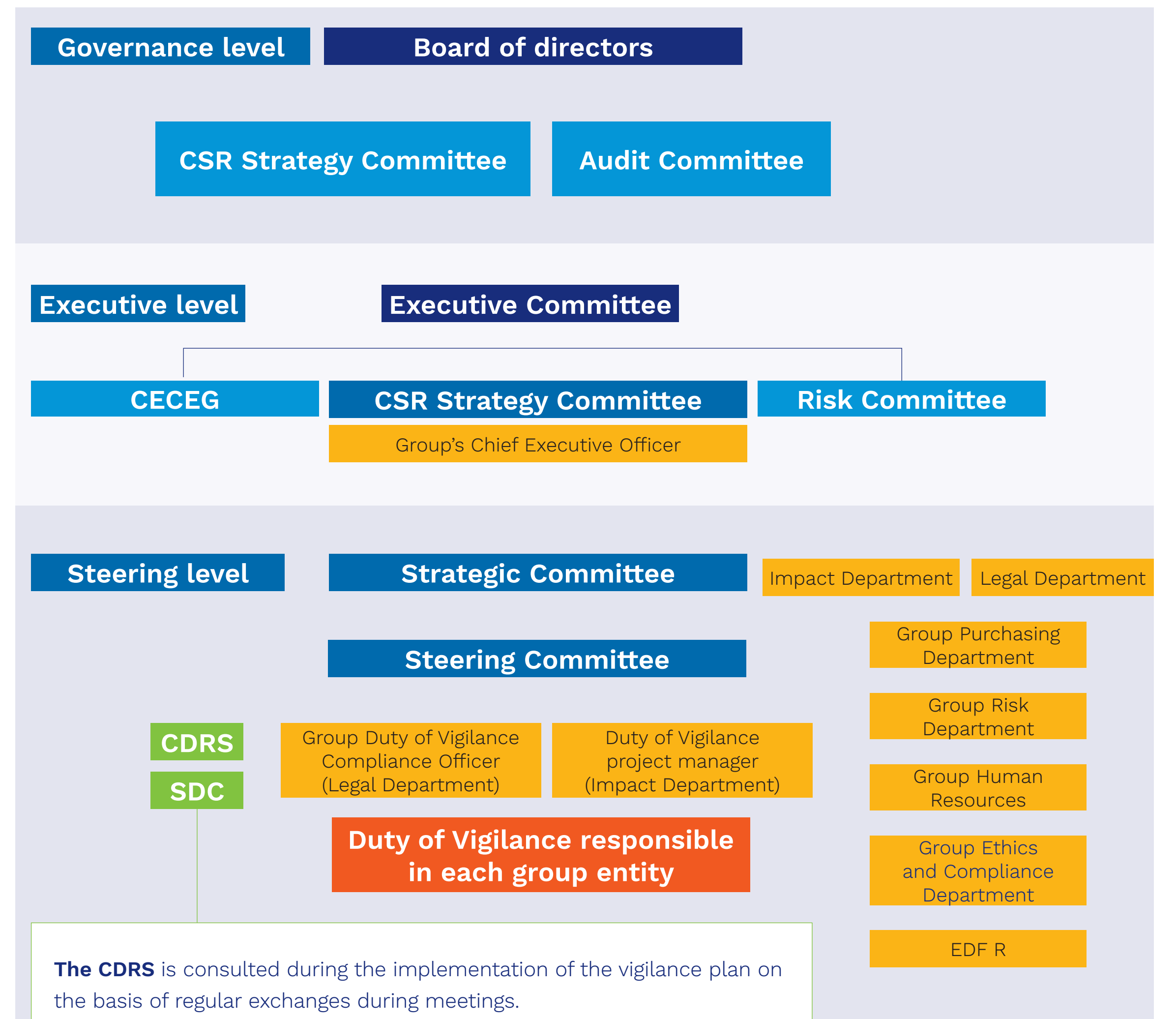
**The Corporate Responsibility Committee** of the Board of Directors validates the actions and orientations of the Group's Compliance Plan.

## Executive level

**The Executive Committee Commitments Committee (CECEG)** examines the alignment of the Group's investment projects with its *Raison d'être* and CSR commitments, as well as the Duty of Vigilance.

**The CSR Strategy Committee** Chaired by EDF's Chairman and CEO, this Comex committee validates the actions and orientations of the Group's vigilance plan.

**The Risk Committee** identifies the Group's priority risks risks, including those related to the duty of care.





## Steering level

The Vigilance Plan is designed and managed in collaboration with the Legal Department and the Impact Department within **a Steering Committee and a Strategic Committee** that also includes the Human Resources Department, the Purchasing Department, the Risk Department, the International Department, the Ethics and Compliance Department, the Export Control and International Sanctions Department, and, when applicable, representatives of subsidiaries with particularly exposed activities.

The Strategic Committee defines the orientations and objectives of the Vigilance Plan in a collegial manner, based on proposals from the Steering Committee. It ensures that these objectives are achieved and may redefine them according to the operational progress reported by the Steering Committee that meet on a quarterly basis.

**The network of Duty-of-Vigilance Officers** deploys and coordinates the vigilance plan in each Group entity.

**The Committee for Dialogue on Social Responsibility (CDRS)** is consulted during the implementation and monitoring of the vigilance plan.

**The Sustainable Development Committee (SDC)** represents all of the Group’s businesses and prepares the files presented to the CSR Strategic Committee.





# Stakeholder association

Dialogue with stakeholders is a major part of EDF's culture. It forms the basis of our cooperation with our stakeholders.

**The Global Framework Agreement on Corporate Social Responsibility has been signed by EDF in 2018 and extended for two years on 29 November 2021 with the Group's trade unions and two international trade union federations (IndustriAll and ISP). It states that EDF's Vigilance Plan is “developed and set up in association with the Company stakeholders, including workers' representative organisations”.**

## CDRS activities in 2022

CDRS meetings focused on:

- the 2021 Vigilance Plan,
- the vigilance actions in 2022,
- the proposed European directive on the corporate duty of vigilance in terms of sustainability was also presented to members,
- changes to the EDF group's whistleblowing system relating to the transposition into French

law of the European directive on the legal protection of whistleblowers.

These CDRS meetings also feature discussions designed to answer members' questions or examine key local issues of which members are aware.

## Exchanges with external stakeholders

Externally, EDF participated in discussions with other companies, lawyers, NGOs, and trade union federations within the framework of the “Entreprises pour les droits de l'homme” (Businesses for Human Rights) (EDH) non-profit organisation, in order to openly exchange on the expectations of all stakeholders, practices and improve Vigilance Plan preparation processes.

In November 2021, EDF also took part in a peer review on the Vigilance plan, organised by

Global Compact, bringing together other groups subject to the law, and personalities from the world of non-profits and research.

In 2022 a specialist in businesses and human rights was appointed to the Group Stakeholder Council to boost the Council's expertise in this field. In June 2022, EDF submitted its Vigilance Plan and its Group-wide implementation to the Stakeholder Council.

At the same time, the Group is steadfastly pursuing discussions opened with a range of members of civil society (non-profits, leading figures) keen to maintain this dialogue, with the aim of continuously improving its Vigilance Plan.

## Committee for Dialogue on Social Responsibility (CDRS)

Since 2018, the CDRS, made up of representatives of all the signatories of the agreement, has been working on numerous topics related to the Duty of Vigilance (health and safety, exercise of the Group's responsibility in the context of international projects, impacts of the pandemic, etc.) and on the actions to be implemented to roll out and improve the Group's Vigilance Plan.



# Main characteristics of EDF as regards the “Duty of Vigilance” law

The EDF group is an integrated energy company engaged in activities involving risks in three fields where the Duty of Vigilance applies. EDF is active in all areas of the electricity industry and some areas of the gas industry: power generation using nuclear, renewable and thermal energies; electricity transmission and distribution<sup>11</sup>; sales; energy services; energy trading.

## Main countries of activity

The Group’s activities are mainly located in OECD countries. Countries considered to be “higher-risk countries” receive special care, including in terms of relations with partners.

The EDF group is a major energy provider on four key European markets: France, the UK, Italy and Belgium. The Group is seeking to move into new geographical areas, developing low-carbon solutions in growing countries and strengthening its positions in Europe.

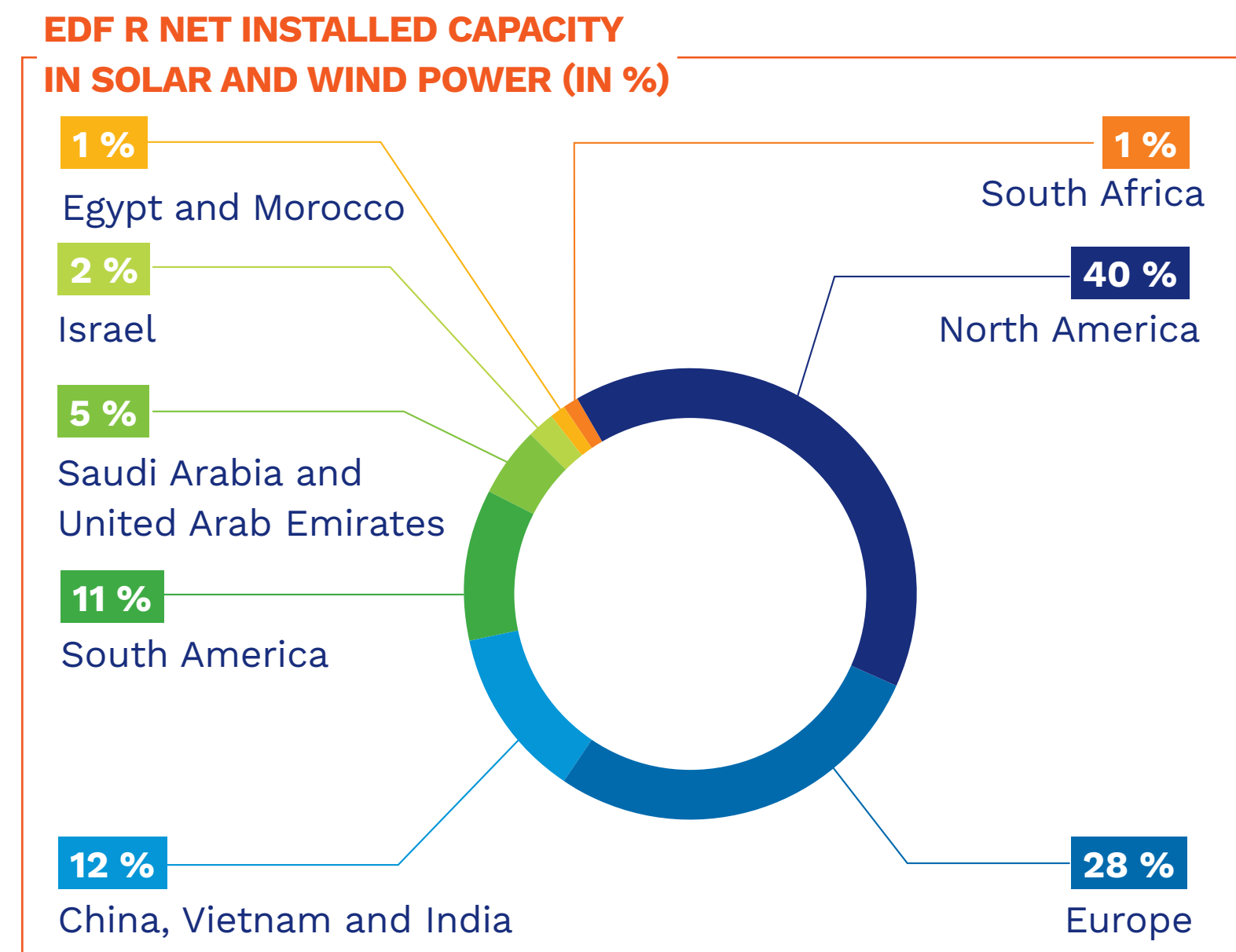
The Group most often develops its overseas projects as minority shareholder, mainly in the following countries: Brazil, Chile, the Middle East (Saudi Arabia and the United Arab Emirates), Western and Central Africa (Cameroon, Côte d’Ivoire, Togo), India, the United States, Germany and Spain.

Group-wide, EDF Renewables develops projects on its own or with partners, operates and maintains renewable power generation facilities (mainly wind and solar) in more than 20 countries. The main zones in which it has historically operated are North America (United States, Canada and

Mexico) and Europe, starting with France and the United Kingdom.

EDF Renewables has also rebalanced its business in geographical terms, increasing its presence in

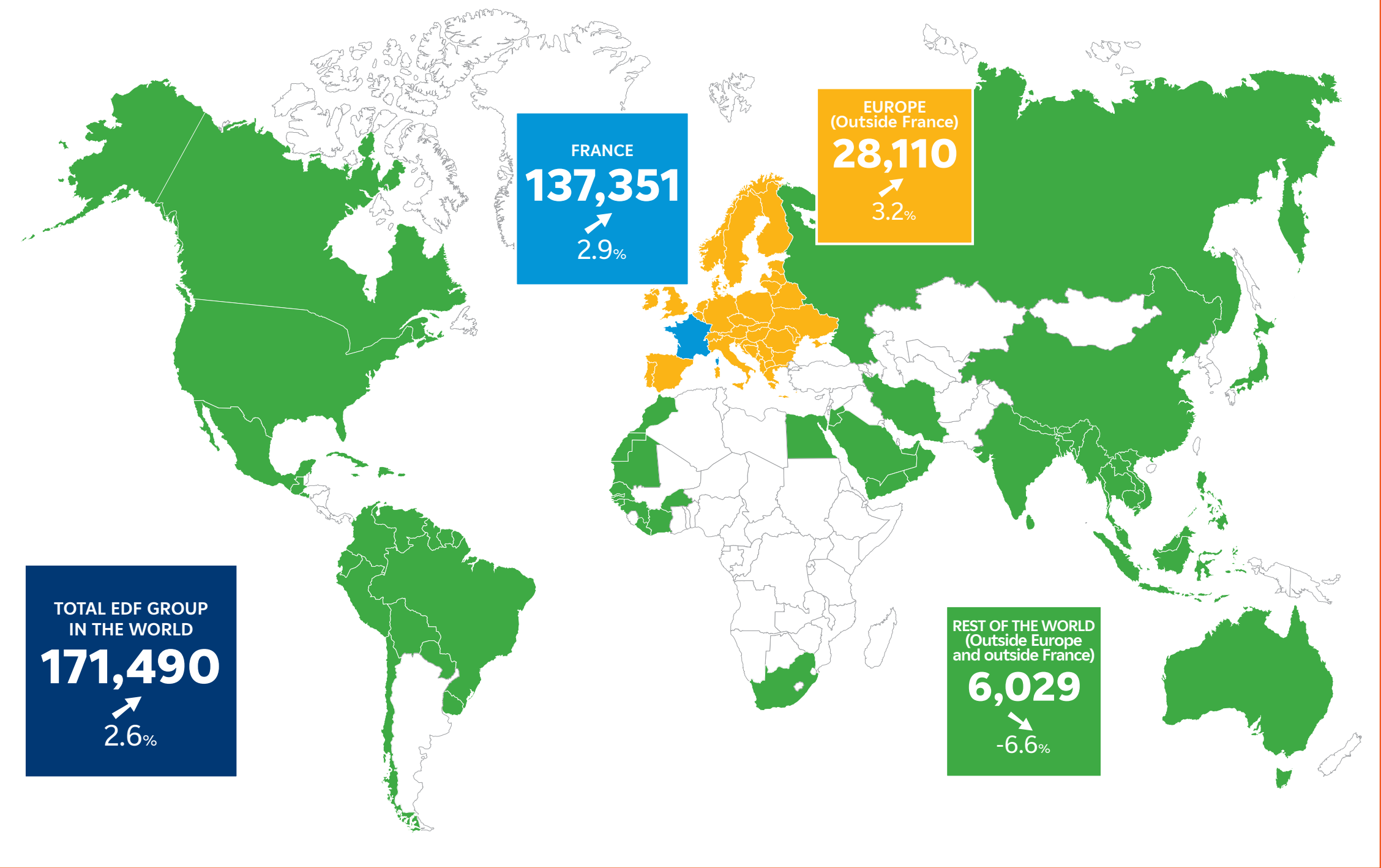
other countries with high potential for the development of renewable energy, including South Africa, Brazil, China, India, UAE, Saudi Arabia, Morocco, and Egypt.



11. In accordance with the principle of independent management of regulated infrastructure operators.



BREAKDOWN OF WORKFORCE



EDF group has operations in Russia in energy services through the Dalkia subsidiary Dalkia Rus and through its Moscow-based office which is in charge of the promotion and development of the Group’s business and new activities in energy

transition in Russia. Following the Russia-Ukraine conflict, EDF ceased operations in Russia, taking the decision in March to close its Moscow office, then announcing on 23 May 2022 the sale of Dalkia’s Russian subsidiary.

Suppliers and subcontractors

The scope of suppliers and subcontractors managed by the Group Purchasing Department represents approximately 11,000 tier-1 suppliers. More than 97% of its purchases are made in France and 99.4% in Europe<sup>12</sup>. Suppliers of certain subsidiaries or suppliers involved in international projects are subject to special vigilance measures. Because the Group’s activities are mainly in the industrial field, EDF exercises upstream vigilance, with regard to any risk of violation of persons’ rights or risk to their health (employees, service providers, local residents, local communities and customers) or risk to the environment prior to making investment decisions, particularly to build, operate, maintain or dismantle facilities.

Scope of the Vigilance Plan

The scope of the Vigilance Plan covers EDF’s activities, the activities of subsidiaries it controls<sup>13</sup>, as well as the activities of its suppliers and subcontractors with which the Group has established commercial relations to the extent their activities are related to those relations.

Dalkia and Framatome subsidiaries with a headcount of over 5,000 employees are integrated in the plan, together with all French and foreign subsidiaries.

RTE and Enedis, respectively the French power transmission and distribution system operators, are independently managed subsidiaries, and therefore publish their own Vigilance Plans.

See the Organisation of the Group on p.53

Purchases made in France

97%

Tier-1 suppliers

11,000

12. Including European Union, Switzerland, United Kingdom.  
13. Subsidiaries integrated into the scope of consolidation using the full consolidation method pursuant to Article L. 233-16 II of the French Commercial Code (in France and abroad).



# Methodology regarding Group risk mapping

The process for identifying and prioritising risks used to develop the Vigilance Plan is based on two complementary approaches:

- **Group risk mapping**, which includes several risks related to the duty of vigilance.
- **additional risk mapping, specifically focused on the entities** most exposed because of their activity and/or their location.

Each Group entity conducts a risk mapping exercise, under the responsibility of management, using a risk typology designed to cover all categories of risk, whether internal or external, operational or strategic, to which the Group is exposed.

## 5 successive steps



## Risk identification

In order to reasonably ensure that the main risks are being identified, **a separate approach for each business process and each asset is combined with a separate approach for each major risk type**. In addition, feedback, events, incidents, and near-misses are taken into consideration as a source of risk identification, as well as the results of audits. The identification of risks is the result of a discussion between the main actors: Managers, experts and stakeholders.

## Risk assessment and prioritisation

The identified risks are qualitatively prioritised according to:

- **their impact**, i.e. their potential criticality, assessed using multiple criteria, including the assessment of the impact on the physical or human environment;
- **their probability of occurrence**, i.e. its degree of likelihood evaluated over a relevant time horizon, estimated on the basis of the history of the activity, feedback, or internal or external expertise;

- **their level of risk control**, i.e. the efficiency of the actions implemented.

The main purpose of the general risk mapping exercise is to **define and implement action plans** (prevention, protection, mitigation etc.) to reduce the impact of the risks and/or risk probability.

### Group risk governance

The EDF group’s risk map is based on the entities’ risk maps, internal control self assessments, and cross-analyses of feedback from operational and functional entities.

The Group Risk Management Department identifies and assesses Group-level risks and draws up a Group risk map, which is validated by the Risk Committee chaired by the Group’s Chairman and then presented to the Board of Directors’ Audit Committee.



# How Group risk assessment shaped the Vigilance Plan in 2022

The EDF Group’s risk mapping process has led to the identification of several structural risks for the orientation of the vigilance plan.

## Methodology

The entities produce an annual risk map based on a methodology ordinary to the Group. The process of constructing the risk map for the entities is based on:

- the principle of management accountability;
- a typology of risks, including internal or external risks and operational or strategic risks, as well as opportunities;
- a qualitative evaluation method for the impact, the probability and the level of control of each risk;
- action plans for dealing with risks and the evaluation of their effectiveness.

Numerous discussions take place between the Group Risk Department and the entities and subsidiaries to review the relevance of risks and the soundness of the control actions undertaken.

## Identification of salient risks

Risk	Description
• <b>Ethics or compliance risk</b>	• Since 2019, this risk has included a “duty of vigilance” component, implementing a Group action programme and requiring Group entities to report back on their own action in this area.
• <b>Adaptation to climate change – physical risks and transition risks</b>	• This risk specifically includes a component focused on the impact of the Group’s operations on the climate.
• <b>Industrial safety violations and impact on environmental assets including biodiversity</b>	• This risk includes special focus on nuclear safety and hydropower safety.
• <b>Risk of managing complex major industrial projects, including EPR projects</b>	• This risk includes a component regarding potential impacts of projects on human rights, the environment, health and safety.
• <b>Risk operational continuity of supply chains and contractual relationships</b>	• This risk specifically includes vigilance-based measures during the contractualisation and contract monitoring stages.

The **risks specific to the Duty of Vigilance** are detailed by area:

- salient risks related to human rights and fundamental freedoms: [see p.20](#)
  - salient risks relating to the environment: [see p.27](#)
- salient risks relating to personal health and safety: [see p.39](#)
  - salient risks relating to suppliers and sub-contractors: [see p.44](#)



# Major improvements of the EDF group's vigilance plan in 2022

In 2022, several projects and actions were initiated as part of a continuous improvement process of the Group vigilance plan.

## Adaptation and roll-out of human rights commitments included in Duty of Vigilance standards

In March 2021, EDF drew up a set of guidelines listing the commitments of the Group (EDF and its controlled subsidiaries) and the fundamental requirements for its business relationships in terms of human rights and fundamental freedoms, environmental protection, protection of personal health and safety and business ethics (see p.08).

These standards are submitted to the members of the CDRS and signed by the Chairman of the EDF group. They:

- summarise its Duty of Vigilance commitments,
- spells out its requirements for its partners, financiers, suppliers, and subcontractors.

In 2022, **EDF began adapting each of human rights commitments featured in its standards** with the aim of explaining, contextualising, and rolling them out. Each commitment has its own human rights guide highlighting:

- the international frames of reference and related definitions,
- the main risk factors,
- main risk management actions,
- available tools, if necessary.

By the end of 2022, the guides focusing on discrimination, harassment, and use of security forces had been finalised.

## More in-depth analysis of country risks

The Group has developed **an in-house country profiling tool** to assess a country's context in terms of risks related to the duty of vigilance. It gathers the values of eight indicators (such as the Gender Gap Index or the Children's Rights in the Workplace Index) for more than 180 countries covering the three Duty of Vigilance themes (Human Rights, Environment, Health and Safety) as well as the country's socio-economic situation.

To complete this tool, in 2021 the Group has subscribed to Verisk Maplecroft® to have **access to the human rights indices** in order to refine and specify the human rights risks that the Group could face in the countries where it operates, purchases and develops. This subscription was renewed and extended to a wider range of indices to enable the Group's different entities to carry out more in-depth analyses.

## Reinforced integration of the duty of vigilance in the purchasing process of the Group Purchasing Department

The Group Purchasing Department has carried out a review to assess the integration of the duty of vigilance in its contracting phases. In 2021, the compliance commitment for bidders (which is mandatory to participate in the tender), covering the themes of corruption, money laundering, financing of terrorism, conflicts of interest and international sanctions, was finalised. Bidders now commit to comply with EDF's requirements relating to the French Duty of Vigilance Act.

In 2022, the CSR charter between EDF and its suppliers, which is a contract document, was updated to include compliance with obligations relating to the duty of vigilance, as well as details of CSR commitments (human rights, the environment, and health & safety) that the Group requires its suppliers and sub-contractors to both comply with themselves and make their own suppliers comply with. The rest of this review will take place in 2023 and will contribute to improving the integration of the duty of vigilance at all levels of the contracting process.



## Addition of the duty of vigilance to the methodological guide on ethics and compliance investigations to be conducted in connection with EDF external growth transactions

The EDF group is regularly required to carry out transactions to subscribe for or acquire securities in French or foreign entities as part of partnerships, major projects, or external growth or investment transactions. In 2023, EDF finalised **a methodological guide providing a practical list and presentation of the different due diligence measures** required in terms of ethics and compliance.

These due diligence measures are based on the Ethics & Compliances Policy, which lists the Group’s compliance programmes, particularly:

- the corruption and influence peddling prevention programme,
- compliance with international sanctions,
- preventing the risk of money laundering and financing of terrorism,
- preventing breaches of competition law,
- export control,
- the duty of vigilance.

This guide sets out a series of due diligence measures to take or actions to implement chronologically and gradually at every phase of an acquisition project/partnership/project based on the level of risk identified at each stage of the project.

## Group-wide awareness campaigns and roll-out of the vigilance plan

The **network of Duty of Vigilance Managers**, appointed at relevant Group entities, has been strengthened. At their entities, these Managers take on duties relating to CSR, Ethics & Compliance, or Internal Control. Five network management sessions were held in 2022, particularly focusing on the following subjects:

- issuing a duty of vigilance roll-out kit for staff newly appointed to these duties at their entities;
- sharing the setup of vigilance measures at certain Group subsidiaries;
- a half-day focusing on human rights, including a talk by an expert and practical case studies in smaller groups;
- regulatory monitoring: the proposed directive on the corporate duty of vigilance in terms of sustainability, the draft European regulation prohibiting products made using forced labour, plus changes to the EDF group whistleblowing system relating to the transposition into French law of the European directive on legal protection of whistleblowers.

With regard to training, in 2021, the Group developed **an e-learning module dedicated to the duty of vigilance** to raise awareness and help deploy the Group’s compliance plan. It provides a definition of the duty of vigilance, its scope of application, the actors involved and the associated

obligations, and identifies the risks and remedial actions through concrete examples relating to the Group’s activities. By the end of December 2022, approximatively 1,500 employees had attended e-learning sessions.

These actions in 2022 are part of a year-round improvement process based on a regularly reviewed action plan.









# Global actions to prevent and mitigate risks related to the duty of vigilance

Risk prevention and mitigation measures are implemented by each relevant entity by way of **applying cross-functional and sectorial policies and using ordinary Group methodology for risk control** as a basis. This methodology provides a description of risk treatment action plans and an evaluation of their efficacy.

Industrial projects are subject to **a risk analysis within the scope of application of the duty of vigilance**, taking into account their nature, size, technical features and location. For this purpose, **environmental and social impact assessments** are based on the most demanding international standards (mostly IFC, WB, ADB<sup>14</sup>).

In addition, issues relating to the environment, personal health and safety and human rights are systematically addressed as part of the **assessment process for projects submitted to the Group**

**Executive Committee's Commitments Committee (CECEG)** and to the Committee that validates the Group's international development projects, the International Business Development Committee (CBDI), in the form of an identification of the risks associated with projects, to ensure that EDF's commitments in this area are not overlooked.

Concretely, this takes the form of identifying the risks associated with the projects for the activities developed and for the supplier and subcontractors relationships envisaged in the framework of the project. This identification will be facilitated by the **providing of a regularly updated grid screening**, which will allow for an analysis of projects that are consistent with the Group's raison d'être, CSR commitments, and guidelines, as well as with international standards. This grid takes into account environmental, health and safety, human rights, and ethical dimensions.



14. IFC: International Finance Corporation. WB: World Bank. ADB: Asian Development Bank.



# Human Rights and Fundamental Freedoms

## Methodology

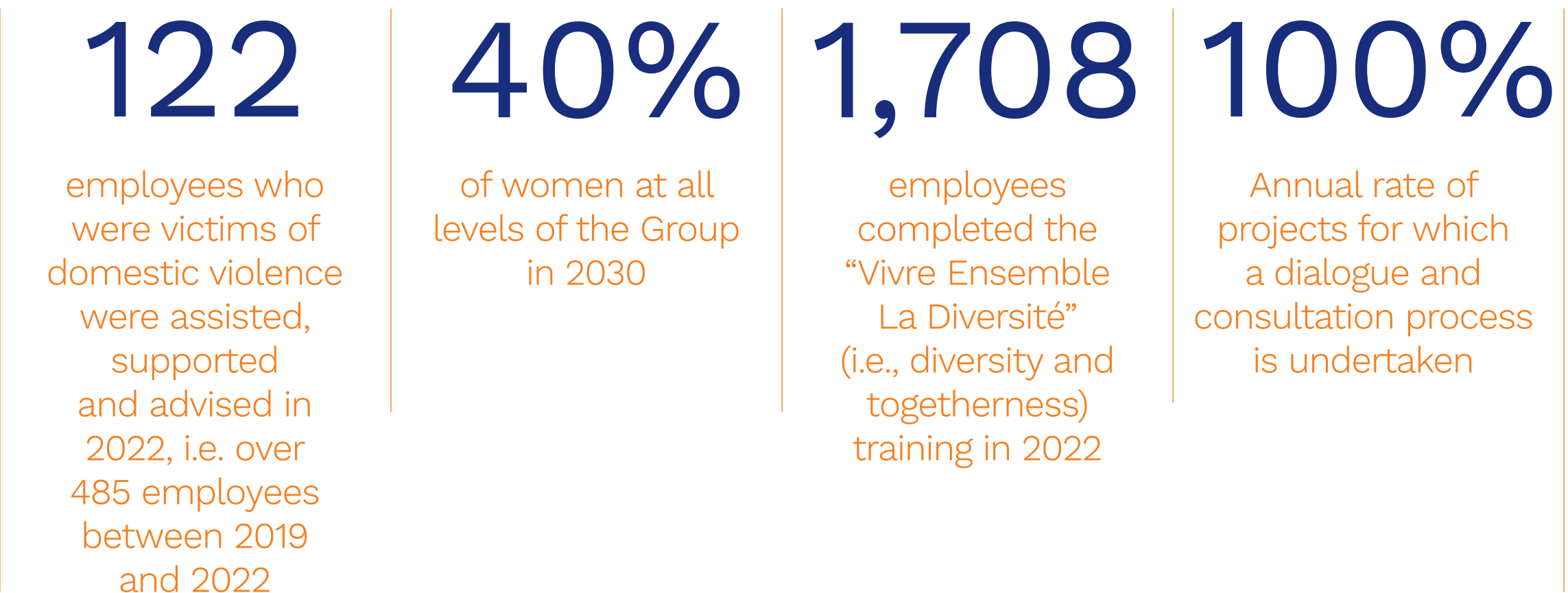
In the area of human rights and fundamental free-  
doms, the Group’s ethics and compliance policy,  
which includes the duty of vigilance, has led the  
EDF group to implement an approach that results

in the identification of key risks and associated  
mitigation measures, assessed according to the  
Group’s activities and the countries where the  
Company and its subsidiaries operate.

## Salient risks relating to human rights and fundamental freedoms

Cross-functional/global level	<ul style="list-style-type: none"><li>• <b>Risks related to harassment and discrimination</b></li></ul>
Group’s international activities and projects <sup>15</sup>	<ul style="list-style-type: none"><li>• <b>Risks of infringing on the rights of local communities: these risks are linked to land issues and population displacements, or to the consequences of inadequate consultation of local communities, particularly indigenous ones</b></li><li>• <b>Risk of infringement of workers’ rights including risks related to decent working conditions at the Group’s construction sites</b></li><li>• <b>Risks related to the use of security forces for projects near conflict zones or security regimes</b></li></ul>

## Monitoring indicators



15. in particular in geographical areas where local practices and situations, as well as legislation, are less demanding than the standards of OECD countries.



## Main prevention mitigation and monitoring measures implemented

The implementation of human rights commitments is part of the deployment of the EDF’s group Global Social Responsibility Agreement and of the Group’s reference framework (see p.08).

### Preventing and dealing with any physical or psychological violence, intolerance or injustice in the workplace

Executives must take all necessary steps to prevent discrimination, harassment and physical and emotional abuse within their entities by striving to make employees aware of such risks. They must provide regular information about the Group whistleblowing system and take appropriate disciplinary action in the event of proven wrongdoing.

### Combating sexism and all forms of discrimination

The EDF group is committed to:

- developing concrete action to promote equality in the workplace and occupational and social integration for disabled people,
- combating sexism and violence,
- combating all forms of discrimination,
- developing support for parents.

Group-wide goals of increasing the number of women at all levels of the

33%

in 2026

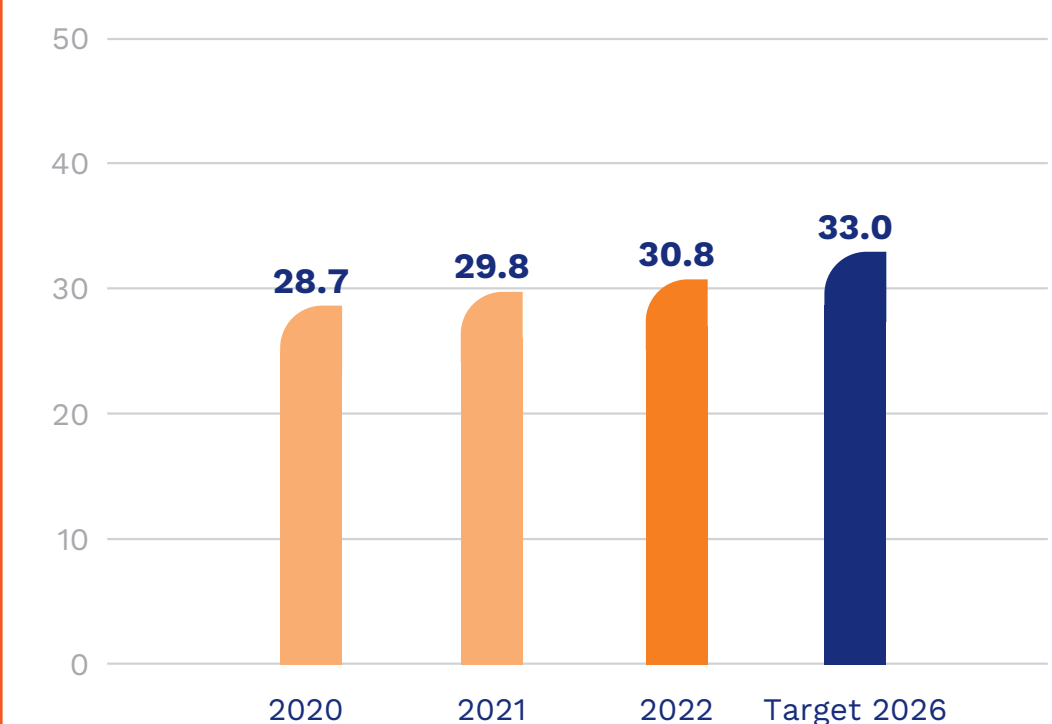
40%

in 2030

The EDF group’s professional equality policy is based on principles such as:

- equal treatment of women and men throughout their professional lives;
- condemning any behaviour or practice that discriminates against employees;
- EDF’s contribution to changing attitudes.

**GENDER BALANCE INDEX: PERCENTAGE OF WOMEN IN THE MANAGEMENT COMMITTEES OF THE GROUP’S ENTITIES (IN %)**







The EDF group and some of its subsidiaries have decided **to apply for an international certification** (GEEIS certification) to assess the quality and relevance of their commitments to gender diversity and equality in the workplace. The certification was renewed in 2019 and, for the very first time, it was extended to all the Group’s other fields of action in terms of diversity and inclusion.

Signing a GEEIS commitment charter, marking the Group’s commitment to fighting stereotypes by deploying inclusive artificial intelligence without gender stereotypes in all business processes and environments.

The EDF group is committed to **preventing and combating all forms of violence against women**, in the workplace (sexism, harassment) and also domestic and family violence (support, guidance and job retention). The aim is to train and raise the awareness of managers and Human Resources personnel on the subjects of sexism and both moral and sexual harassment.

Thus, with the help of the “ENERGIES mixité!” network, a new “sexism barometer” was set up as part of the #StOpE multi-company initiative, of which EDF has been a member since the beginning. Operational implementation of such measures was carried out in partnership with the Company’s medical and social teams and the “FIT, une femme un toit” association in particular.

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employees who were victims of domestic violence were assisted, supported and advised in 2022. Overall, more than 485 employees were assisted between 2019 and 2022.

The EDF group is committed to societal and professional integration of disabled people, with its **12<sup>th</sup> EDF agreement for equal rights and equal opportunity and the occupational integration of disabled people**, entered into on 11 January 2023 for the 2023-2025 period. The issues we face change over time, such as digital technologies, which were made a special point of focus in the latest EDF disability agreements, resulting in the signing of a first EDF digital accessibility policy in February 2022. EDF Renewables also renewed its agreement in December 2022 for the same period. Framatome has a valid agreement until the end of 2023.

In order to **prevent racial discrimination**, the EDF group addressed in 2021 the issue of its origins, and more specifically racism in the workplace, in a reference document for its managers and Human Resources (RH) Officers.





The EDF group has been committed to respecting religion in the workplace since 2008, and published a first set of guidelines in 2010 (updated in 2016), setting out guidelines for managers and HR officers to help them understand, analyse and act in compliance with the law.

EDF is also partner of L'Autre Cercle<sup>16</sup>, of the Energyay association<sup>17</sup> since 2010, and has been a signatory of the LGBT charter since 2015. EDF's HR staff and managers have been provided since 2015 with guidelines on "Respect for sexual orientations in the workplace". EDF has also designed, in partnership with Energyay, a process to accompany and support transitioning employees within the Group. "Supporting transitioning employees at EDF – Respect for gender identity" guidelines were published.

To implement these policies of inclusion and equal opportunity, EDF has produced **educational and training materials for its entire workforce**, whilst still providing managers and HR staff with more targeted materials. The Company trains everyone involved in its recruitment process, using training course on how to "recruit without discrimination".

To **raise awareness about diversity among employees** and promote the emergence of inclusive practices and organisations, the Group set up a range of digital training courses called "Vivre Ensemble La Diversité" (i.e., diversity and togetherness) in the form of serious games played by 1,708 employees in 2022 (i.e., 16,155 employees overall since they were launched).



**A toll-free hotline<sup>18</sup>** for all employees of the Company, operating seven days a week, to allow employees to confide in someone and obtain advice on all harassment and discrimination issues; a support team (with internal and external skills) intervenes in investigations carried out when alerts are reported.

## Preventing risks related to the Group's international activities and projects concerning violations of the rights of communities and workers and the use of security forces

The EDF group does not tolerate any infringement of human rights or fundamental freedoms in its operations or in those of its business relationships for operations related to the relationship.

These commitments are implemented and based on the principles of action that apply to all Group operations such as:

- **initial and ongoing screening and management of environmental and societal impacts** and risks, including those caused by operations as part of its business relationships;
- arranging, systematically and worldwide, **transparent, debated discussions and consultations** for each new project relating to a facility drawing on a budget of more than €50 million and having a significant impact on the territories or the environment;
- implementation and monitoring of these commitments and requirements is ensured under the **Group's internal policies or agreements**, in particular the CSR policy, the ethics and compliance

policy, the purchasing policy, the health and safety policy, the global CSR agreement, the Ethics Charter and the roll-out of the Vigilance Plan;

- implementation of **systems for collecting and processing reports of wrongdoing**, that are accessible and notified to anyone who could be impacted by the Company's operations, guaranteeing the confidentiality of the reports and protecting internal whistleblowers (employees and external staff<sup>19</sup>).



Depending on the context of the project, **a Human Rights Impact Assessment (HRIA)** is conducted. It is based on the principles defined by the UN Guiding Principles on Business and Human Rights, as developed for example by the Danish Institute for Human Rights. These studies place the identification of impacted human rights at the centre of the analysis.

16. L'Autre Cercle is an LGBT+ non-profit organisation (lesbian, bisexual, gay and transgender people, plus any people who do not identify as heterosexual and/or cisgender) whose main aim is to combat discrimination in the world of work ([www.autrecercle.org](http://www.autrecercle.org)).

17. Energyay is the LGBT association for the electric and gas industries and their [www.energyay.org](http://www.energyay.org)

18. Toll-free hotline 0800 30 40 40.

19. Occasional staff (trainees, work-study trainees, etc.) but also service providers or partners.

20. Projects over €50m in line with the Equator Principles – Group scope.



They include:

- an assessment of the state of human rights in the country as well as in the project area,
- a mapping of human rights-oriented stakeholders (listing “rights-holders” and “duty bearers”),
- an analysis of the project’s impacts on these rights,
- the development of mitigation measures.

This type of study identifies the activities at risk according to their importance and sensitivity. These studies are generally entrusted to national or international consultants specialising in the topic, and managed by EDF’s internal CSR referents.

The conclusions of these studies are intended to be integrated into all development, construction, operation and end-of-life activities of the project, via an ad hoc management system (internal CSR policy, CSR contact and correspondents, contractual tools, audits and performance monitoring, reporting, etc.). They concern both affected communities and workers, the use of security forces, the whistleblowing system and the protection of whistleblowers, etc.

**With regard to decent working conditions**, external inspection and audit missions carried out on the sites of internationally financed projects

(such as the Nachtigal project) enable the Group to detect breaches of the Group’s commitments at each stage of the project’s life.

**At the level of the investment decision-making process**, a strong focus on human rights, through the Group’s commitments framework, is integrated into each analysis files of projects presented to the Group Executive Committee’s Commitments Committee (CECEG), as well as to the Validation Committee for the Group’s international development projects (CBDI). Efforts are also systematically made to identify project-related risks of violation of human rights relating to both developed activities and relationships with suppliers and sub-contractors being considered for projects.

This identification will be facilitated by the construction of a screening grid which will allow for an analysis of projects that are consistent with the Group’s raison d’être, commitments and guidelines, as well as with international standards. This grid takes into account all of the Group’s human rights commitments and requirements, such as compliance with the ILO’s fundamental conventions (on child labour, forced labour, freedom of association, discrimination), the rights of local communities, and health and safety conditions for the populations in question.

### Wind project in Chili

As part of an onshore wind project in the Antofagasta region, EDF Renewables Chile conducted an anthropological survey of the indigenous Chango community, based on interviews with five organisations from the Chango community, which has begun the process of reconstructing its past. The information collected will be added to the preliminary impact study carried out as part of EDF Renewables’ project.

### Solar park in Israel

The Gevim project, on which construction was completed in March 2022, is located near the Gevim Kibbutz – a typical Israeli collectivist village. Representatives of the kibbutz and the district committee’s environmental team identified that the photovoltaic facility would have a visual impact on the kibbutz’s inhabitants and that the unique landscape would be affected as a result. So it was decided that a buffer zone of vegetation would be set up between the facility and the kibbutz, and that the facility must be made to blend into its environment as much as possible. A wide strip made up of trees and local plants requiring only limited watering was planted between the facility and the kibbutz.

**On the EDF group International Department projects**, human rights risks are examined and managed at different stages of projects.

#### • During the pre-development phase:

- for “new” countries, a “country” assessment is carried out using the Verisk Maplecroft® tool, an in-house country profiling tool or other sources.
- Specific due diligence measures can also be taken for specific industries: accordingly, a Human Rights Risks study was conducted in 2022 in Colombia to assess issues specific to the hydroelectricity sector, focusing on possible development zones, resulting in the

creation of a risk matrix (for EDF activities, local communities, and suppliers & sub-contractors) and issuing of management recommendations. Identified risks include, among others and depending on zones:

- \_ lack of community participation in and mistrust of projects, particularly in mining regions;
- \_ possible conflicts over water resources;
- \_ deteriorating security conditions, and use of security forces;
- \_ protection of whistleblowers (environmental and social), etc.





#### • During the development phase:

- depending on identified country risks, combined with project specifics, a Human Rights Impact Assessment & Management (HRIAM) study will be set up. This is currently the case in Malawi on the Mpatamanga project, for which EDF was selected with SCATEC as “strategic sponsor”. The aim of this study is to:
  - \_ specify the “Human Rights” context in the project zone, in connection with future development and construction activities;
  - \_ draw up a matrix of risks and opportunities generated by the project regarding human rights;
  - \_ identify “rights-holders”;
  - \_ identify social and environmental studies that need to incorporate a human rights component;
  - \_ submit a Human Rights Policy proposal for the project.
- **Human Rights clauses** are also systematically included in construction contracts (“EPC”) to build major infrastructure such as hydroelectric facilities, but also for smaller contracts such as photovoltaic generators for “B&I” (Business & Industry) clients, particularly in Sub-Saharan Africa.

#### • During the construction phase:

- claim and complaint management systems are set up for workers and communities (in addition to systems provided by EDF and any lessors).

### Conflict between Russia and Ukraine

Before the start of the war in Ukraine, the EDF group operated in Russia in two ways. Firstly, in the energy services field, via Dalkia’s subsidiary in Russia, the company Dalkia Rus. Then, via its Moscow office that was tasked, in Russia, with (i) promoting Group business lines and (ii) developing new activities relating to the energy transition.

Since the start of the war in Ukraine, the EDF group has relied on the measures set out in its vigilance plan to make sure that neither its activities nor the activities of entities with which it is in business feature risks of serious violation of human rights, health and safety, or the environment.

It has also relied on the provisions of the [OECD Guide](#)<sup>21</sup>, which recommends that businesses assess any plans to terminate a business relationship based on the importance of this relationship,

the legal consequences of the pursuance or termination of the relationship, changes that termination would cause in the field, as well as any credible information regarding potential negative economic and/or social impacts of the termination decision.

Accordingly, EDF suspended its operations in Russia, taking the decision in March 2022 to close its Moscow office, then announcing on 23 May 2022 the sale of Dalkia’s Russian subsidiary, Dalkia Rus.

Besides, to ensure that no contractual relationships breached the packages of sanctions adopted against Russia, the EDF group relied on its organisation and guidelines in terms of export control & sanctions. More generally, the decision to pursue certain relationships was always taken in accordance with international sanctions and restrictions imposed by Russia, the absolute need not to violate human rights, fundamental liberties, personal health and safety, and the environment, or to jeopardise nuclear security, plus continuing to secure the electricity supply of France and European countries, which – given the current geopolitical and economic situation – is a key goal as electricity is an essential product.

### Ongoing litigation in Mexico

In 2018, an NGO referred the planned Gunaa Sicaru wind farm, managed by a subsidiary of EDF Renewables in Mexico, to the OECD’s French national contact point (NCP). During the course of the OECD mediation process, the EDF group took part in two dialogue meetings with the plaintiffs and provided some responses to the concerns raised. The NCP closed the matter in spring 2020. The indigenous consultation process conducted by the Mexican authorities was suspended following the earthquake in 2018, and due to the Covid-19 pandemic. The process is now taking its course after the judge ordered the resumption of the consultation.

Likewise, in December 2019, EDF responded to a formal notice for the same project sent pursuant to the French “Duty of Vigilance” Act by that NGO and four individuals. EDF was then summoned on 13 October 2020 to appear before the Paris Court of Justice (tribunal judiciaire) under the French “Duty of Vigilance” Act. The applicants have asked the court to order changes to the Vigilance Plan produced by EDF to better address, in particular, the risks posed to the rights of indigenous communities and to order compensation for the damage caused by its failure to fulfil its duty of vigilance. EDF has challenged these two applications.

21. OECD due diligence guide for responsible business conduct, published on 20 March 2018.





On 30 November 2021, the pre-trial judge rejected the non-profits’ request for a precautionary suspension of the project as well as their request for an injunction against EDF’s Vigilance Plan, due to the lack of a prior formal notice. The applicants appealed the judgment of the pre-trial judge. The Tribunal proposed mediation, which EDF accepted. Since then, the process has been ongoing at the court of appeal.

On 12 July 2022, the French NCP published a press release noting the bolstering of EDF’s corporate policy and the work done on human rights, as well as engagement with stakeholders. As these measures met its recommendations, the NCP accordingly ended its monitoring<sup>22</sup>. Developments in the case are also being monitored by members of the CDRS ([see p.11](#)).

A website dedicated to the project is available in English and Spanish:  
<https://www.gunaa-sicaru.com/>.

22. <https://www.tresor.economie.gouv.fr/Articles/2022/07/26/pcn-francais-edf-et-edf-renouvelables-au-mexique>



# Environment

## Methodology

Group mapping of risks is performed based on the Group’s line of industrial activities. Environmental risks are identified, assessed, and prioritised through the environmental management system (EMS) and the internal control system linked to Group risk management. The identification of environmental risks is part of the Group’s overall risk management system. Each company draws up its own risk map, based on the Group’s methodology, and defines action plans to reduce and limit its risks.

The 2022 risk mapping update reconfirmed the 2021 risk analysis and did not highlight new environmental risks. The main change concerns the observation of the effects of climate change with higher temperatures in summer and droughts increasing the pressure on both environments and some of the Group’s business lines such as hydropower and nuclear activities.

## Identification of salient environmental risks

Salient risks	Generation activities most exposed
• <b>Impact on the climate: climate change and GHG emissions.</b>	Power and heat generation activities from fossil fuel.
• <b>The impacts of EDF’s activities on the air, water and soil and the production of waste.</b>	Power generation activities (nuclear, thermal, hydropower, wind and solar power).
• <b>Protection of biodiversity and services provided by ecosystems.</b>	
• <b>The management of water resources.</b>	

## Monitoring indicator







## Main prevention, mitigation and monitoring measures implemented

To prevent and mitigate risks of serious harm to the environment, EDF relies on its Environmental Management System (EMS) and its CSR policy to commit its entities to a precautionary approach and acting responsibly. The most significant risks are covered in risk control plans in conjunction with the Group's CSR policy.

In order to implement the environmental goals and related actions based on its CSR commitments and policy, the EDF group has set up a Group-wide environmental management mechanism using an EMS. This management system relies on EDF's governance bodies, which define the environmental guidelines and objectives to be achieved, in line with the expectations of external and internal stakeholders. In accordance with the requirements of the CSR policy, each of the Group's entities<sup>23</sup> is implementing an environmental management approach adapted to its own issues.

The EMS' operation is carried out by Group and business processes that allow for certification to stakeholders:

- **controls environmental risks and ensures that the EDF group complies with regulations and its commitments:** each entity draws up and implements an environmental programme or action plan that takes into account the Group's commitments concerning it, its significant environmental aspects, and its regulatory obligations, considering its risks and opportunities;
- **improve the efficiency of its organisations in a way that is appropriate to the issues at stake:** each entity is responsible for its own internal control, internal and external audits of its EMS, and interfaces with the Group EMS;
- **mandatory non-financial reporting of the environmental activities of the entities:** each entity collects and communicates the required environmental information to the Sustainable Development Department.

The Group's EMS is certified by an external body, AFNOR, according to the international standard ISO 14001.



In 2022, the results of the certification audits conducted by AFNOR confirm the quality of the leadership, strategies, and policies built in alignment with regional issues and the needs and expectations of stakeholders. The auditors also underlined the effective and rigorous coordination of environmental management systems at certified entities and subsidiaries, and noted progress on management of environmental impacts on business lines, with issues relating to CO<sub>2</sub> and biodiversity increasingly taken into account.

These audits revealed 11 new minor non-compliances; the 14 minor non-compliances from the previous audit campaign were resolved. The main area in which progress is expected is the systematic taking into account of environmental impacts from the design phase, based on the principles of the circular economy and development of a Group-wide prevention and prediction culture by better analysing causes and monitoring the effectiveness of corrective actions. Increasing internal audits, which drive progress, would also be beneficial.

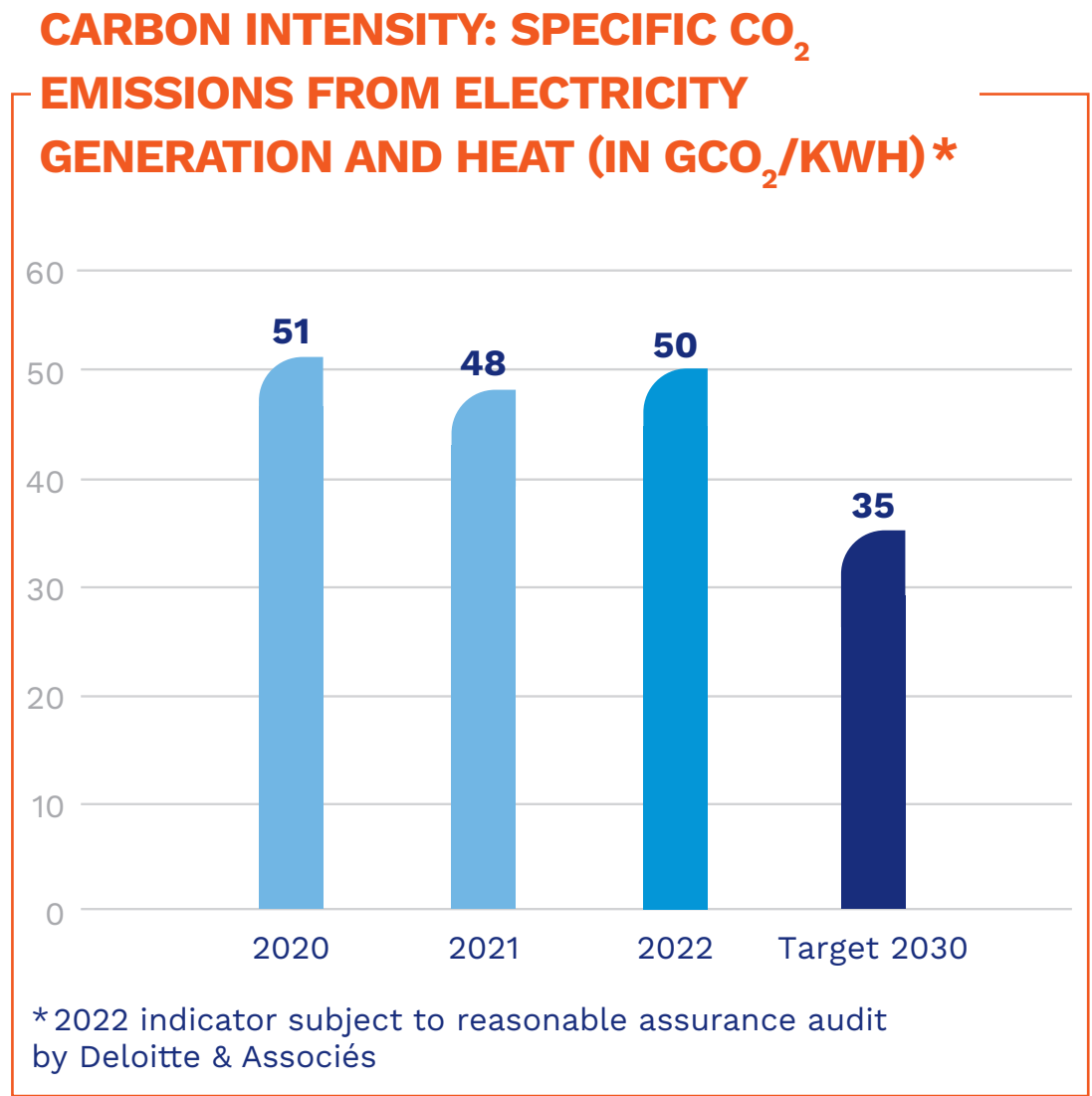
23. Companies with industrial, operational (installation, operation, maintenance), engineering, distribution and marketing activities relating to goods and services.



## Prevent impacts on the climate

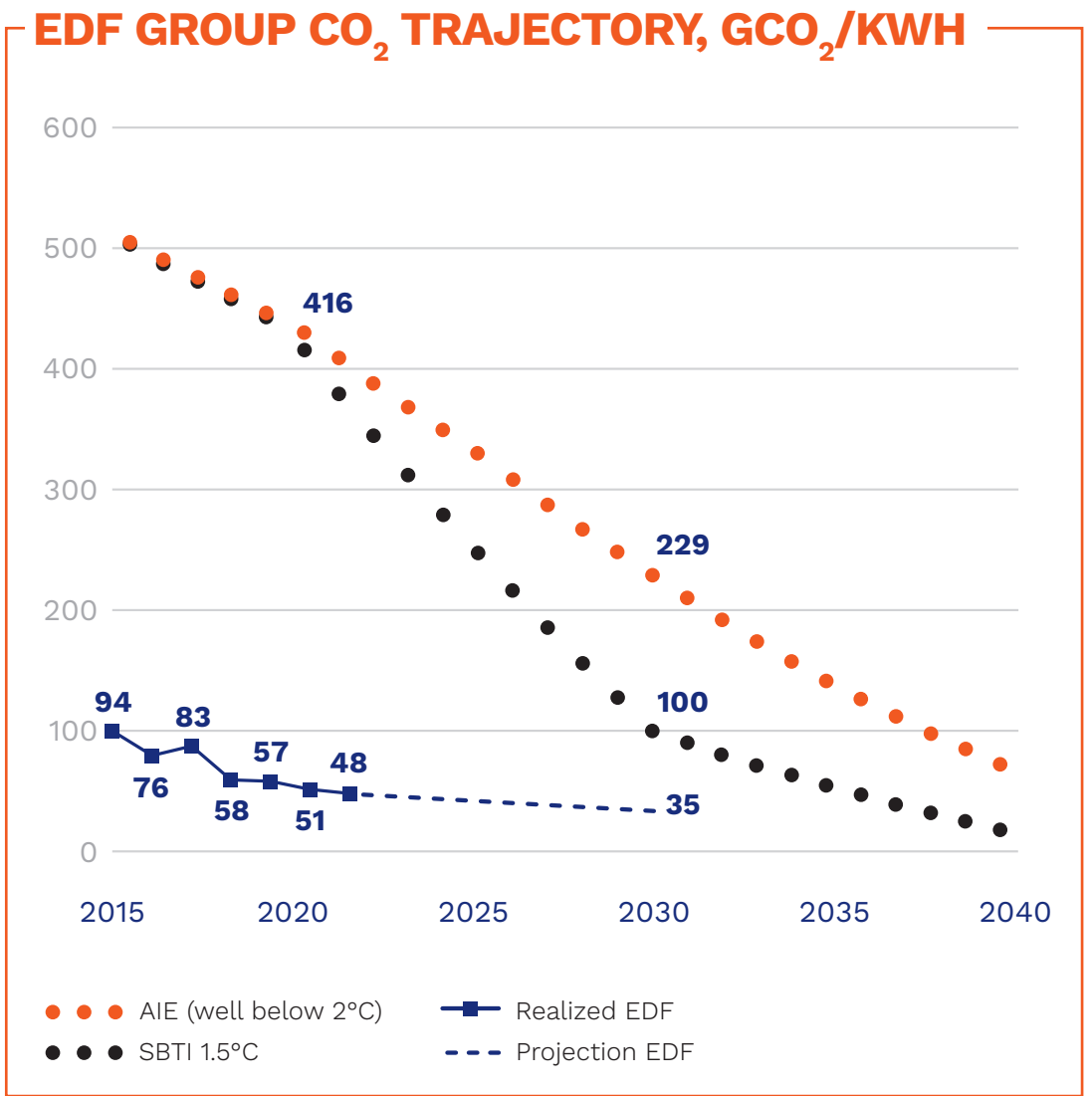
The EDF group recognises the urgency of acting against climate change. It has aligned its ambitions with the Paris Climate Agreement, whose goal is to limit global warming to well below 2, preferably 1.5°C, relative to pre-industrial levels. The Group's CO<sub>2</sub> emission reduction trajectory has been validated by Science Based Targets. The EDF group has set up a dedicated governance structure in line with the best practices recommended by the Task Force on Climate-Related Financial

### Group carbon trajectory



Disclosure (TCFD). The Group's climate strategy, aligned with CAP 2030, is accompanied by four CSR commitments:

- **an ambitious carbon trajectory,**
- **carbon offsetting solutions,**
- **adaptation to climate change,**
- **the development of electricity uses and innovative energy services, which form the EDF group's climate transition plan.**




## Carbon neutrality by 2050

The EDF group was one of the first companies, way back in 2018, to set itself the goal of contributing to achieving carbon neutrality by 2050. This commitment was strengthened and clarified in March 2020. This involves in practical terms:

- **direct emissions:** reducing the Group's direct greenhouse gas emissions to zero or virtually zero by 2050;
- **indirect emissions:** reducing indirect greenhouse gas emissions as much as possible within the framework of national policies;
- **Group residual emissions:** implementing negative-emission projects to offset the Group's residual emissions by 2050.

This covers emissions of all greenhouse gases for all Scopes (1, 2 and 3) and for all operations of the Group across the globe.

## 2030 targets recognised by the SBTi

 In 2020, the EDF group set new targets to cut its greenhouse gas emissions by 2030, covering both its direct emissions (Scope 1) and its indirect emissions (Scopes 2 and 3). On 7 December 2020, the Science Based Targets initiative<sup>24</sup> confirmed based on its recently-published methodology specially developed for the electrical sector<sup>25</sup> that these goals are in line with Well Below 2°C trajectory. The EDF group thus committed to the following 2030 targets:

- **50% reduction, on 2017 levels** for Scope 1 and Scope 2 emissions, also including emissions from non-consolidated assets and emissions associated with electricity purchased (i.e. not generated by it) to be sold to end customers;
- **28% reduction, compared with 2019 levels** of emissions from combustion of gas sold to end customers (Scope 3).

24. Initiative launched in the wake of the Paris Agreement in 2015 by the following four organisations: CDP, UN Global Compact, World Resources Institute and World Wild Fund.  
25. Setting 1.5°C aligned science based targets quick start guide for electric utilities, CDP, June 2020.



In keeping with these targets validated by SBTi, the EDF group has decided to set the following additional 2030 targets:

- **25MtCO2** for Scope 1 emissions in 2030,
- **a 28% reduction on 2019 levels** of the emissions of the entire Scope 3 by 2030.

In order to reach these targets, a greenhouse gas emissions reduction trajectory has been developed for the three Scopes of the EDF group. This trajectory contains a 2023 milestone, with the following interim targets:

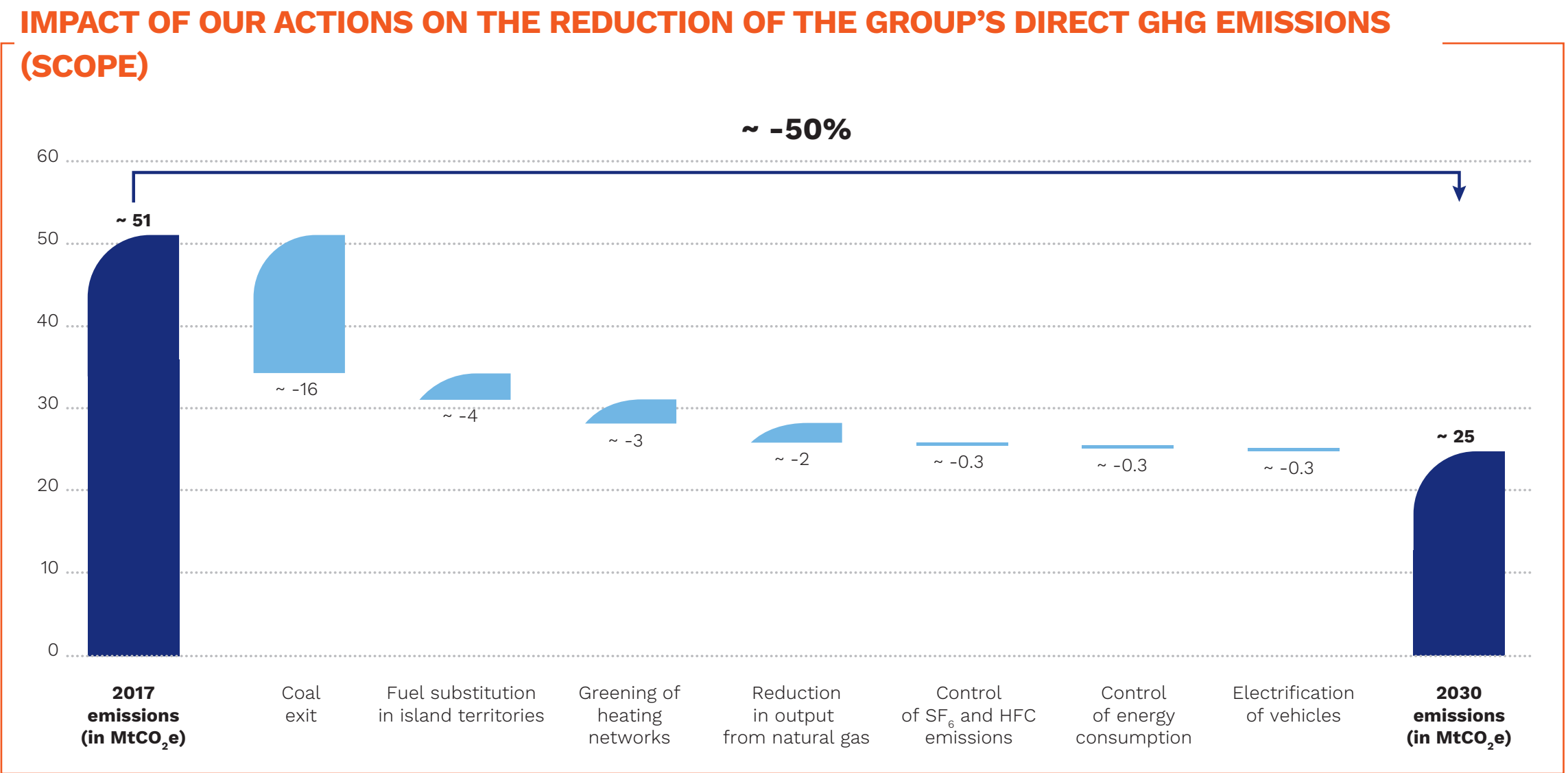
- **28 to 30MtCO2°** for Group Scope 1 emissions in 2023;
- **23% reduction, on 2017 levels** for Scope 1 and Scope 2 emissions, also including emissions from non-consolidated assets and emissions associated with electricity purchased (i.e. not generated by it) to be sold to end customers;
- **10% reduction, on 2019 levels** for emissions associated with the combustion of gas sold to end customers and an 8% reduction for the entire Scope 3 of the Group.

These 2023 and 2030 Group direct and indirect emissions targets were used to determine emission trajectories for all the Group’s business lines and entities.

SBTi Indicators	2021	2022	2030 target validated bt SBTi
Rate of reduction in emissions relating to the sale of electricity (emissions in Scopes 1 and 2, also including emissions from non-consolidated assets and emissions relating to electricity purchased for sale to end customers, baseline year: 2017)	- 28%	- 33%	- 50%
Rate of reduction in emissions relating to the sale of gas (emissions from the combustion of gas sold to end customers, baseline year: 2019)	- 24%	- 32%	- 28%

Main measures implemented to achieve this ambitious goal

By 2030, and in line with the CAP 2030 projects, the main actions enabling the EDF group to achieve these emission targets covering all three Scopes are as follows:





**Coal-fired power generation, currently representing 0.4% of the total power generation, to be reduced to 0 by 2030**

The EDF group is implementing its commitments by closing down coal-fired electricity generating plants. In 2019, the Group committed to ending all coal-fired power generation by 2030 across all geographical zones.

A regulated and limited functioning in the long term: in 2020, coal-fired heat and electricity generation accounted for 0.5% of the EDF group's total in 2022 output. These generation assets are used only during so-called “peak” periods and energy market crises<sup>26</sup>, as was the case for winter 2021-2022 and the coming winter 2022-2023.

In France, carbon-fired power generation facilities must not exceed a set emissions limit<sup>27</sup>. To cope with supply issues due to the economic situation, the emissions limits for these generation assets were temporarily adjusted<sup>28</sup>. Accordingly, in case of increased use of coal-fired thermal generation systems, the operators of these facilities must offset any excess emissions due to the increased limit. This offsetting requirement takes the form of a one-off payment of €40/t of CO<sub>2</sub>e emitted to a carbon offsetting fund. The purpose of this fund is to finance greenhouse gas reduction or capture projects in France.

## Energy transition in island regions

Corsica and the French overseas territories, as Non-Interconnected Zones (NIZ) in terms of the mainland power grid, are covered by specific Multi-Year Energy Programme (PPE), which set ambitious low-carbon and energy independence goals for them (energy independence of overseas territories by 2030 and Corsica by 2050). Among other measures, the EDF group is progressively replacing fuel oil with liquid biomass and shutting down both Combustion Turbines (CT) and the oldest motors.



## Greener heating networks

The EDF group, through its subsidiary Dalkia, manages over 330 urban heating and cooling networks. Dalkia has set itself the goal of achieving 65% renewable and recovered energy in its heating networks in France by 2026.

In particular, this commitment has led to development of the use of biomass, energy from waste, the recovery of fatal heat, and geothermal and oceanic thermal energy conversion.

26. The Conseil constitutionnel (i.e., French constitutional council) authorises increased fossil fuel-fired power generation facility emissions limits only in case of a serious threat to power supply security (Decision 2022-843 DC of 12 August 2022).

27. In accordance with Article R. 311-7-2 of the Energy Code.

28. In accordance with Article 36 of Act 2022-1158 of 16 August 2022 introducing emergency measures to protect spending power and its implementing Decree 2022-1233 of 14 September 2022.



### Low-carbon thermal energy

Gas activities account for a significant share of the EDF group’s GHG report, particularly through three activities: production of electricity from natural gas, production of heat from natural gas, and sale of natural gas to end customers. Because natural gas emits approximately two times less CO<sub>2</sub> than coal, and enables the production of electricity that can be managed ahead of time, **it can play a role in the energy transition of some countries, like Italy where it replaces coal.**

The EDF group has defined a set of internal criteria in order to align its gas business with its climate-related commitments:

- All EDF group’s gas activities fit into the carbon trajectories (covering both direct and indirect emissions) set for each of the Group’s entities in line with the Group’s 2030 goals. All development projects must demonstrate a contribution to the energy transition of the relevant regions and their business plan must ensure compliance with the Group’s 2050 carbon neutral target.
- No development of new gas projects (Combined Cycle Gas – CCG), unless the project contributes to reducing the carbon intensity of the country’s electrical system or further secures its supply. Whenever technically and

economically feasible, the project must use solutions designed to reduce its direct emissions, such as green gas, hydrogen or carbon capture and storage.

- The EDF group helps its gas customers to shift to energy savings, energy efficiency and a reduction in their emissions through its products and services, expertise and specialised subsidiaries. It develops and encourages alternative solutions to fossil fuels whenever available (low-carbon electricity, heat pumps, renewable gas, renewable heat etc.).
- The EDF group supports the development of the biogas sector whenever a project’s business model is viable in the long term. It does so mainly through its subsidiary Dalkia, which operates in biogas production, processing and recovery activities, both for cogeneration and direct reinjection into the natural gas distribution network.
- Finally, the EDF group is constantly working to optimise the energy and environmental performance of its fossil fuel-fired fleet **in order to reduce its CO<sub>2</sub> emissions**, as well as to provide more services to the electricity system.

To hit its direct GHG emissions reduction targets, the EDF group is also committed to taking action to manage and reduce SF<sub>6</sub> and HFC emissions, manage the consumption of Group facilities, and relating to its fleet of vehicles and staff travel.



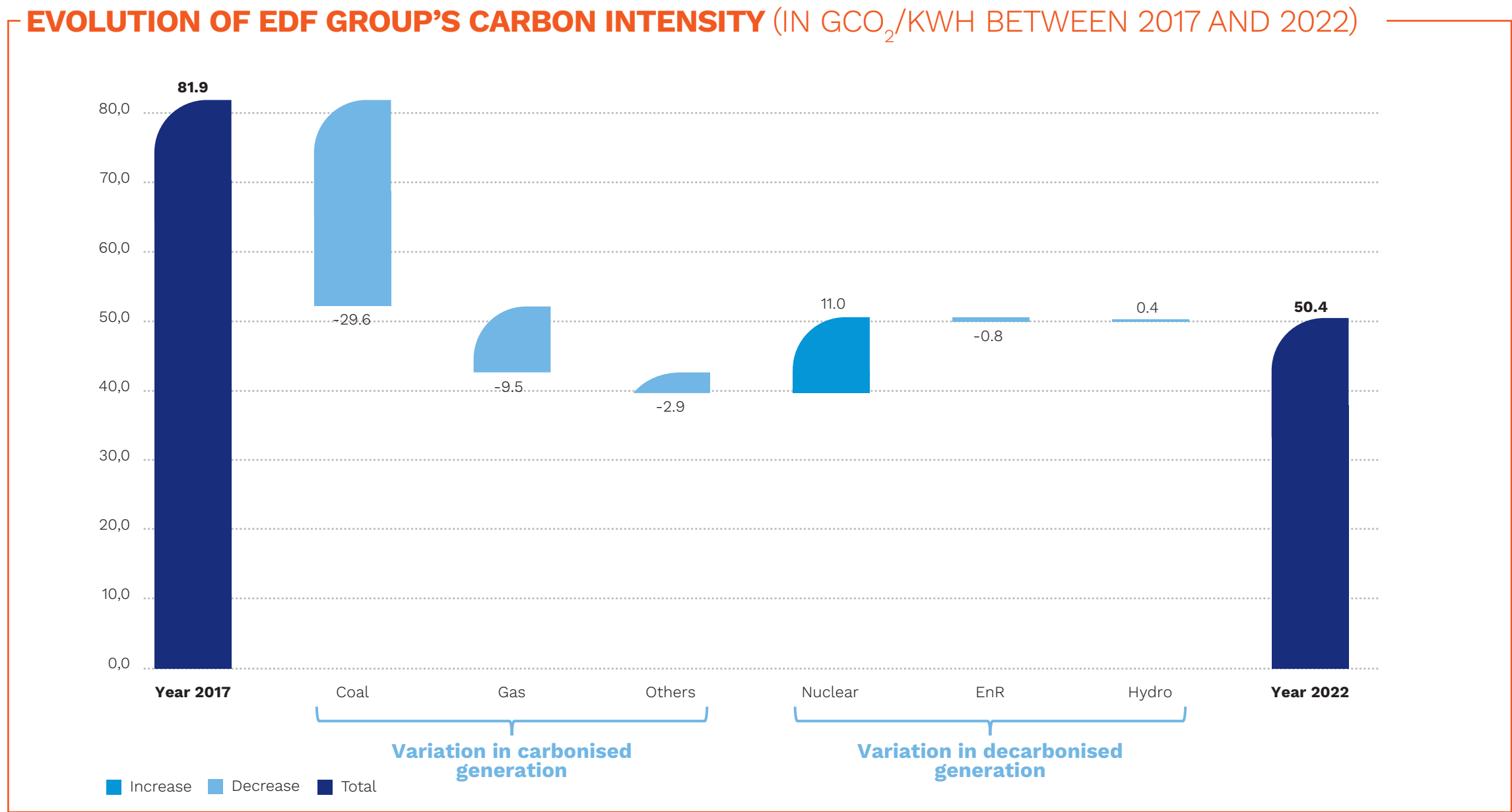
**By 2030, and in line with the CAP 2030 projects, the main actions enabling the EDF group to achieve its targets relating to decarbonised generation are as follows:**

Subjects	Actions
Grand Carénage	<b>Continued operation of France’s nuclear power plants beyond 40 years thanks to the Grand Carénage programme.</b>
New Nuclear	<b>In February 2022, the French President expressed his desire for 6 new EPR2 nuclear power generation reactors to be built in France and commissioned from 2035, and for 8 additional reactors to be studied. The Head of State also announced the development of the NUWARDTM reactor and innovative reactors.</b>
Development of renewables	<b>Doubling of installed renewable energy capacity, including hydro, between 2015 and 2030, to reach 60GW net in 2030.</b>
Flexibility and management of intermittency	<b>Development of electrical storage to improve system flexibility and management of the intermittency of noncontrollable renewable energies.</b>

Applying Group EDF roadmaps to reduce Scope 1 direct emissions and increase low-carbon production by 2030 should result in the EDF group achieving its carbon intensity reduction goal of 35gCO<sub>2</sub>/kWh by 2030.



The following diagram shows the estimated impact to date of the climate transition action plan on the EDF group’s carbon intensity.



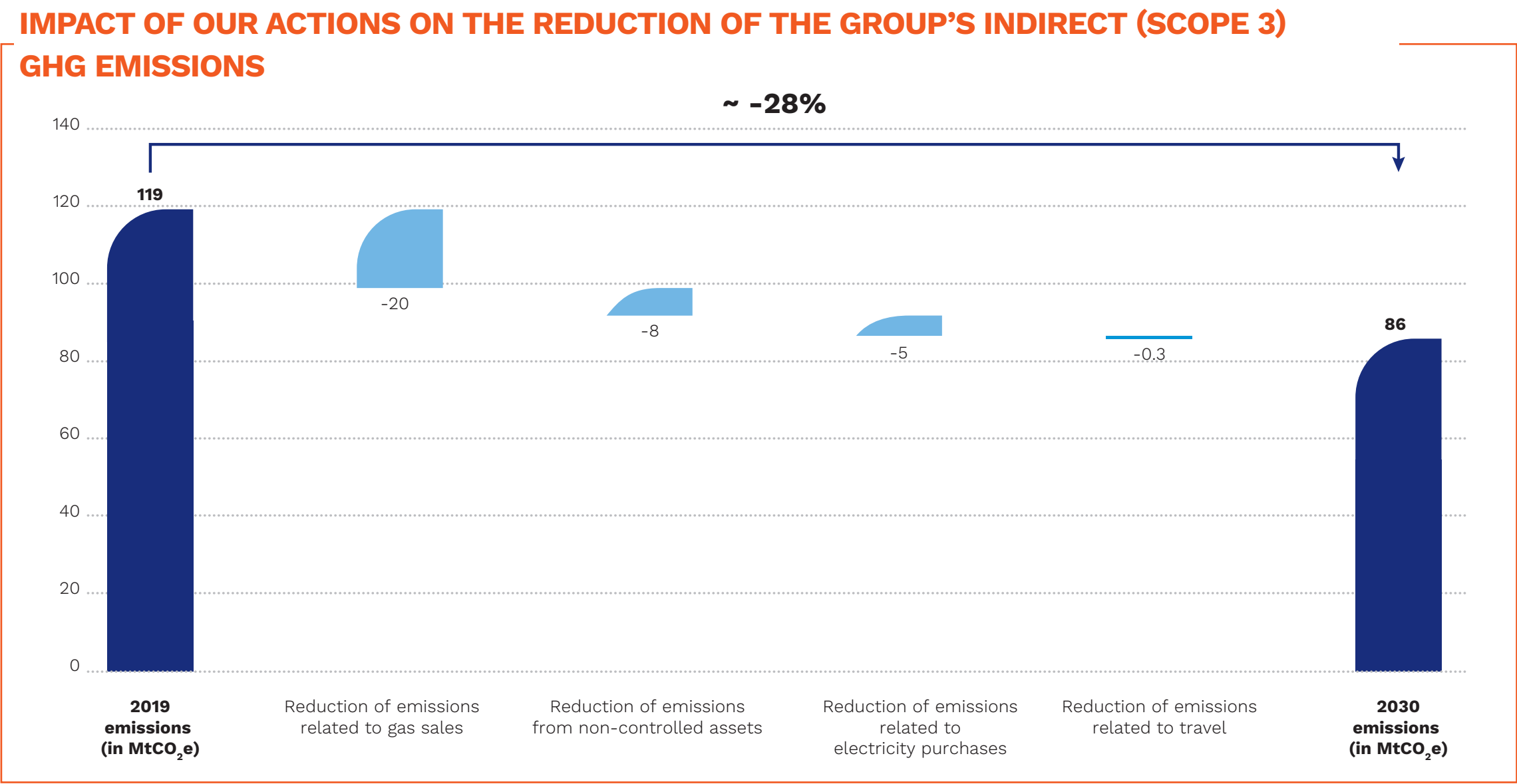
### Low-carbon investments

The Group is by far the biggest investor in the energy transition in Europe, accounting on its own for more than 20% of industrial investments in the electrical sector. In 2022, almost 94% of Group EDF investments were in low-carbon technologies; 50% of these were in the nuclear sector. 66% of the Group’s investments are aligned with the European sustainable taxonomy in effect since 31 December 2022.

### Doubling of installed renewable energy capacities between 2015 and 2030

The EDF group is today the second biggest renewable energy producer in Europe, with a global production in 2022 of 60.2TWh of electricity and 8.8TWh of renewable heat through hydroelectricity, wind turbines, photovoltaic solar power and other renewable energies. In accordance with its CAP 2030 strategy, it set itself the goal of more than doubling its net installed renewable capacity.

By 2030, and in line with the CAP 2030 projects, the main actions enabling the EDF group to achieve these indirect GHG emission targets are as follows:



66%

of the Group’s investments  
are aligned with the European  
sustainable taxonomy in effect since  
31 December 2022



The following table provides details these actions taken by the EDF group:

Action	Description
Reduction in emissions relating to the sale of gas	<ul style="list-style-type: none"><li>• Gas customer portfolio management;</li><li>• Support to consumers in their transition towards energy sobriety, energy efficiency, and the reduction of their emissions via Group offers, expertise, and subsidiaries, in particular by promoting alternative solutions to fossil fuels;</li><li>• increased biomethane injection rate into the natural gas distribution network in line with national strategies.</li></ul>
Reduction in emissions relating to the purchase of electricity	<ul style="list-style-type: none"><li>• Greening (use of renewable energy Power Purchase Agreements) of purchases of electricity for sale to end customers in countries where electricity has a high carbon intensity;</li><li>• management of portfolios of customers for which the EDF group sells but does not generate power.</li></ul>
Reduction of travel emissions	<ul style="list-style-type: none"><li>• Reducing emissions from employee travel, in view of the roll-out of the EDF group's new travel policy.</li></ul>
Reduction of emissions from non-consolidated assets	<ul style="list-style-type: none"><li>• Disinvestment by 2030 from coal-fired power generation assets located in China in which the EDF group has a minority holding.</li></ul>

Carbon offsetting solutions

For the EDF group, use of carbon offsetting is **the final stage of a process to achieve neutrality**, based on the “Avoid-Reduce-Compensate” approach. Carbon offsetting must not under any circumstances take the place of a strategy designed to drastically reduce the Group’s emissions, whether direct or indirect.

The EDF group is focusing on the use of “negative emissions” projects to offset its residual

emissions by 2050, compared to “avoided emissions” projects. This can include technological solutions, such as Bio-Energy with CO<sub>2</sub> Capture and Storage (BECCS), or natural solutions, such as carbon storage in forests and soil. In accordance with current carbon compatibility rules<sup>29</sup>, emission credits from carbon offsetting are not deducted from the EDF group greenhouse gas report and are accounted for separately.

29. GHG Protocol Corporate Accounting and Reporting Standard, WRI-WBCSD, 2015.





Prevent the impacts of EDF’s activities on the air, water, soil, biodiversity and the production of waste

Nature features four domains: land, oceans, fresh water, and the atmosphere. These domains are home to environmental assets, i.e., living or non-living natural elements. Ecosystems make up a large share of these assets, making the provision of ecosystem services, such as supplying fresh water, possible.

Business has positive or negative impacts on nature. Short-term impacts on nature can cause changes to the quality and resilience of environmental assets, which in turn generate medium and long-term risks for organisations, due to their dependency on them.

Policies on how to preserve natural resources are based on analysis of physical and transition

risks, and, among other measures, take the form of public commitments. The Group organised an assessment of biodiversity issues along the full value chain, including mapping issues upstream and downstream from its activities (Scope 3).

This biodiversity risk assessment, carried out using the double materiality method on dependencies and impacts, was based on the ENCORE database (Exploring Natural Capital Opportunities, Risks and Exposure). The main issues concern not only operations but also activities upstream from the EDF group value chain. Some of these upstream activities, particularly fuel and material supply operations, feature dependency issues relating to nature (resources, regulation services) and pressures (e.g. on ecosystems and water resources). The risk materiality analysis (physical and transition risks) shows that risks are correctly identified and covered, with some room for improvement.

Group Nature Commitments

The EDF group has a long-standing commitment to minimising the impact of its activities on biodiversity through a dedicated policy. Today, this ambition is reflected in its commitment to two mechanisms.

2020-2022 Nature Commitments	In France:	Commitment themes:
	Entreprises engagées pour la nature (EEN) initiative led by the French Office for Biodiversity (OFB).	
	Internationally:	
	Act4nature International initiative set up by the French non-profit EpE (Entreprises pour l’environnement, i.e. Enterprises for the Environment).	

These commitments cover all of the Group’s business lines, in all geographical areas and within the scope of operational activities that present biodiversity challenges.

30. IPBES: Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services.



In 2022, the Group increased nature governance and dialogue with stakeholders in the field.

## The Group’s actions to protect and manage the natural resources impacted by its activities through responsible land management

The Group’s action is based on three pillars.

### 1<sup>st</sup> pillar: reducing the activities’ contribution to major pressure factors

Most of the pressures applied to biodiversity are strictly governed by regulations. The IPBES report in 2019 identifies five major pressure factors: changing use of land and sea, overexploitation of resources, climate change, pollution and invasive alien species. EDF has developed its action programme to limit its impact on each of these factors.

#### PMO doctrine

The Group applies the principles of the mitigation hierarchy or the regulations of the country where it is located, if these are more stringent (particularly in Europe). Group companies apply the PMO (Prevent, Minimize, Offset) hierarchy for all projects and facilities in operation. The environmental and societal impact assessments are completed prior to projects, pursuant to the current regulations and best practices (such as IFC Performance Standards if they are more restrictive).

### Projects

For its new projects, the Group optimises its footprint and positions new industrial developments preferably on sites that have been subject to soil artificialisation. Appraisal and site restoration operations are carried out by the Group’s internal engineering entities with the assistance of external service providers. Regarding investment decisions, 100% of the projects presented to the CECEG are screened for risks related to biodiversity.

#### Structures currently in operation

Impacts of structures currently in operation, in particular nuclear structures, on the environment and biodiversity are the subject of monitoring conducted by EDF teams and scientific organisations such as IFREMER or IRSN.

#### Offsetting proposal

The EDF group conducted an experiment in the Isère department on the offsetting proposals with the “Initiative Biodiversité Combe-Madame” non-profit organisation and key community players. The experiment came to an end with the presentation of the project to the stakeholders in 2021. Dialogue on the actions that could be jointly carried out in the future on this site of both ecological and scientific interest is continuing.

## 2<sup>nd</sup> pillar: Recreating spaces and conditions conducive to biodiversity

### Positive ecological management

The Company manages natural sites belonging to the land it owns in partnership with local associations. EDF employs positive ecological management practices such as late mowing or eco-grazing. Part of the land owned is allocated to spaces dedicated to the protection or recreation of biodiversity, via management plans tailored to the site’s issues.

To consolidate the approach, EDF relies on several levers such as the certification of sites in whole or in part, or the signing of Real Environmental Obligations, for example on the former site of Ambès (about 42ha).

#### Extending consideration of biodiversity to third parties

For years, EDF has been committed to an approach to sustainably manage land and respect its biodiversity. The Company takes account of issues specific to natural environments and the animal and plant species present, and since 2020 has more systematically included these in its conceded land agreements (with local owners, municipalities, non-profits, etc.).

In 2022, 89% of the new agreements on the concession area include requirements in favour of biodiversity. An educational booklet presenting the ecological interest of the proposed measures has been drafted in conjunction with the *Fédération des conservatoires d’espaces naturels* (Federation of Conservatories of Natural Areas – FCEN).

## Protected areas and endangered species

### Europe

Several EDF sites contribute to achieving the preservation targets in the Natura 2000 areas and to implementing the Natura 2000 contracts. The Group takes action via multiple programmes dedicated to preserving biodiversity (e.g. Life+). EDF Hydro has been committed to protecting the Pyrenean desman since 2010 (currently via the 2021-2030 National Action Plan), Luminus migratory fish, and Enedis bearded vultures (Life Gypconnect 2015-2021). In the summer of 2022, the European Commission validated two new LIFE projects to limit the impact of power lines on birds: SafeLines4Birds, which concerns a dozen priority species over most of mainland France, and GypAct, which focuses on the protection of the Bearded Vulture in the Massif Central and the Pre-Alps. The Group also contributes to developing regional versions of these plans (dragonflies, otters, etc.).



### 3<sup>rd</sup> pillar: improving and sharing knowledge

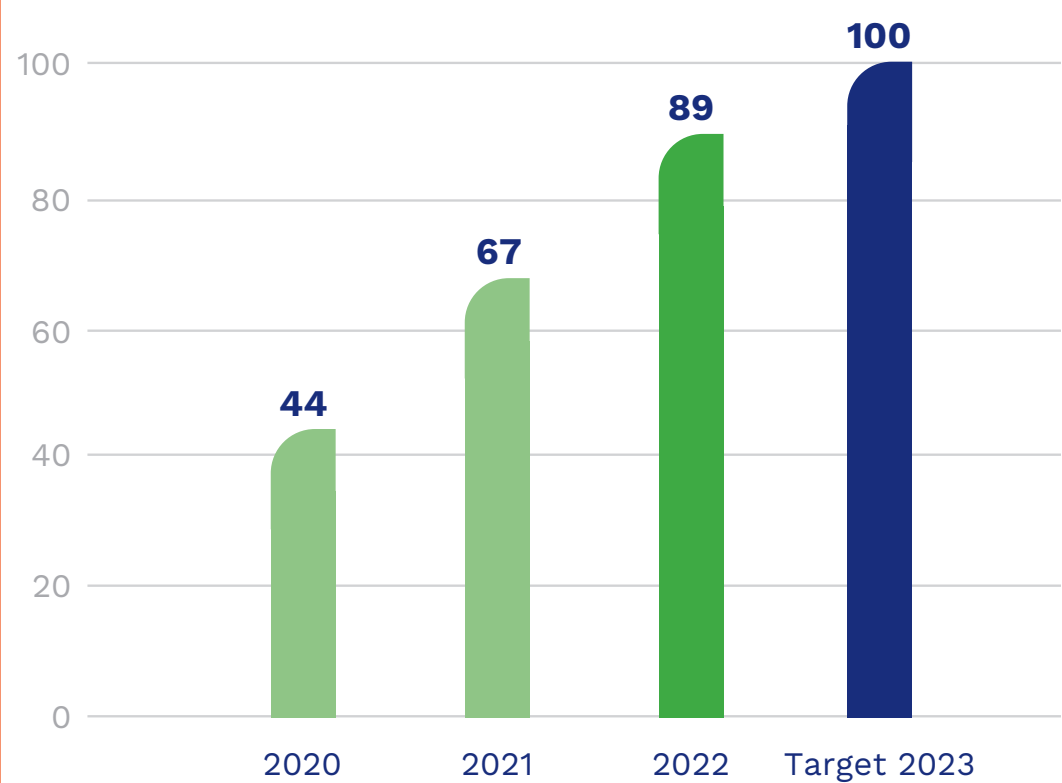
#### Research and biodiversity

For over 50 years, EDF has had a dedicated R&D and engineering department working on the environment (currently around 40 people with a budget of €10 million), in partnership with outside organisations.

#### Awareness of the ecological quality of land

The Company integrates biodiversity as one decision-making criterion in its industrial choices. The vast majority of EDF production sites are located close to protected sites and remarkable natural areas.

#### ACHIEVEMENT RATE OF “ACT4NATURE INTERNATIONAL” COMMITMENTS (IN %)



### The Group’s actions to protect and manage the natural resources impacted by its activities through integrated and sustainable water management

Water is an essential resource to generate most types of power, either to cool nuclear and thermal power stations, or to drive hydroelectric power stations. It is an issue identified in the Group materiality matrix.

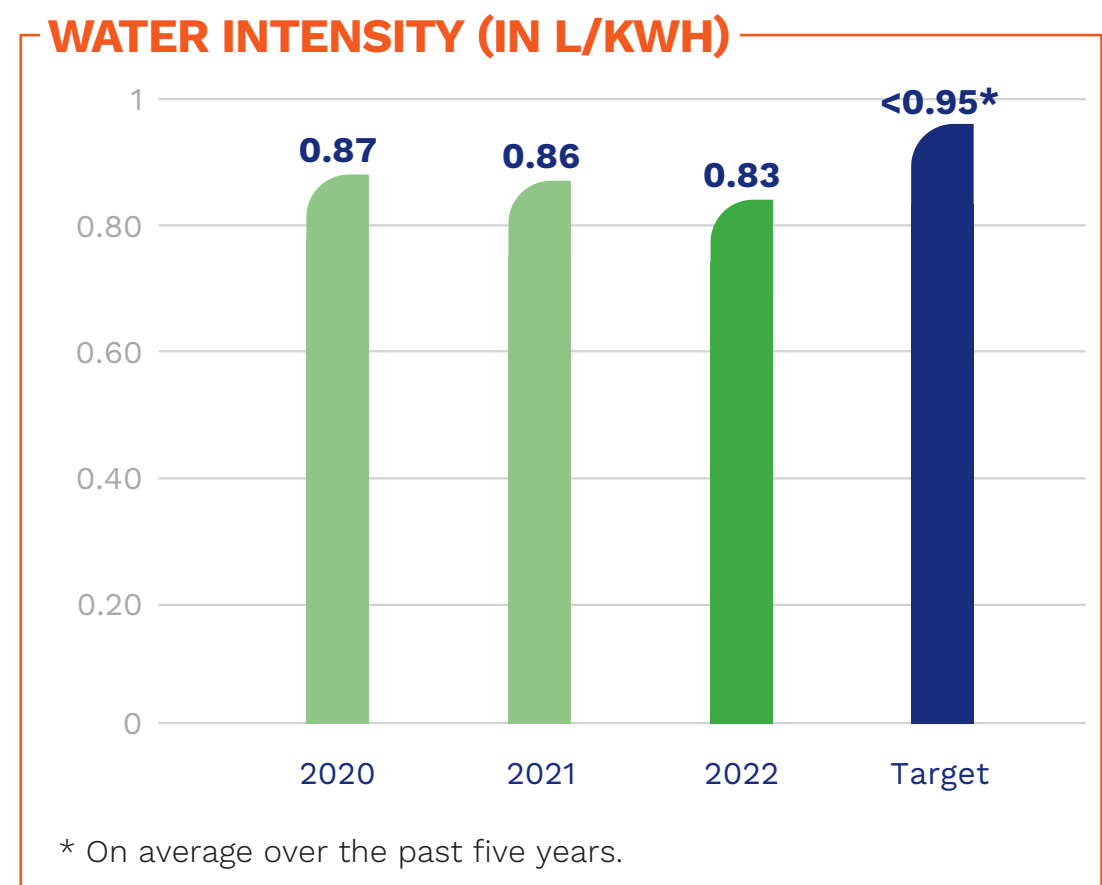
This is why the Group committed in its CSR policy to **protecting and managing water in an integrated and sustainable manner**, both in terms of quantity and quality and to discuss water issues with the regions in which it operates, fully taking account of the localness of water, particularly multiple uses of water faced with increasing climate issues. In mainland France, dams operated by EDF are used to store billions of cubic metres of water and have an essential role to play during droughts and heat waves.

#### Group water withdrawals

At the Group level, around 39 billion cubic metres of water are used for cooling thermal power facilities, of which 99% is reusable and returned virtually instantaneously to the natural environment. As such, EDF is a significant user, but negligible consumer, of water. Main water is not used for cooling systems but only for various forms of water process for a share lower than 0.1%.

The bulk of the water withdrawn by its installations is in France (79%) and the United Kingdom (19%) in areas where water stress is limited. The Group’s water withdrawals are down by 8% compared to 2021, mainly due to the significant decrease in nuclear generation.

A significant number of nuclear and thermal facilities are located by the sea and therefore do not use fresh water for cooling but sea water (without any quantitative constraints). 69% of the water withdrawn for cooling purposes by the Group comes from marine or estuary environments. This percentage is almost 61% in France, over 99% in the United Kingdom and close to 93% in Italy. For the remaining 31% (fresh water), the quantity of freshwater sourced from groundwater is marginal and amounts to 2hm<sup>3</sup>, about 0.01% of the fresh-water surface.





Group actions regarding radioactive and conventional waste, as well as the circular economy

Optimising the use of the natural resources consumed by the Group’s value chain is an essential component of the Group’s corporate responsibility. **The Group is committed to promoting a circular economy approach;** avoiding the production of conventional waste and promoting the re-use, recycling and recovery of products/ materials throughout the value chain; using this waste by reallocating uses internally within the Company during new developments, or in approved recovery channels; and assuming its responsibilities with regard to radioactive waste.

The Group’s actions to improve air quality

The EDF group is continuing its process of modernising and improving the environmental performance of its thermal fleet, until it meets the best available techniques in Europe.

The EDF group supports public initiatives to improve air quality. France’s “Climate and Resilience” Act strengthens outdoor and indoor air quality standards (mobility, heating, building renovation). As a responsible energy company, EDF has developed unique skills in this field over many years, and works with partners to propose solutions to improve air quality.

EDF provides a range of innovative solutions to improve the indoor air quality of buildings.

Change in SO<sub>2</sub>, NO<sub>x</sub> and dust emissions Group-wide:

SO <sub>2</sub> and NO <sub>x</sub> emissions	2020			2021			2022		
due to heat and electricity generation (in kt)	SO <sub>2</sub>	NO <sub>x</sub>	Dust	SO <sub>2</sub>	NO <sub>x</sub>	Dust	SO <sub>2</sub>	NO <sub>x</sub>	Dust
EDF group	17	30	3	18	31	3	16	29	3
EDF	3	9	0.2	4	10	0.2	3	10	0.2





# Health & Safety

## Methodology

The mapping of risks to the health and safety of employees and service providers is carried out by the Health and Safety Division, which is responsible for health and safety management, on the basis of risk analyses carried out by the Group's various entities and subsidiaries, in line with the Group's risk mapping system.

## Identification of salient risks relating to health and safety

Health and safety of employees and service providers	<ul style="list-style-type: none"><li>• Occupational accidents, occupational illnesses (asbestos, chemicals, ionising radiation and noise)</li><li>• Musculoskeletal diseases and anxiety-depressive disorders, including stress</li></ul>
Health and safety of consumers and local residents	<ul style="list-style-type: none"><li>• Safety of nuclear and hydraulic facilities</li><li>• Air quality</li><li>• Noise and light pollution</li></ul>

## Monitoring indicator

100%

of the Group's scope had carried out a self-assessment of its health and safety management system according to the BEST reference framework





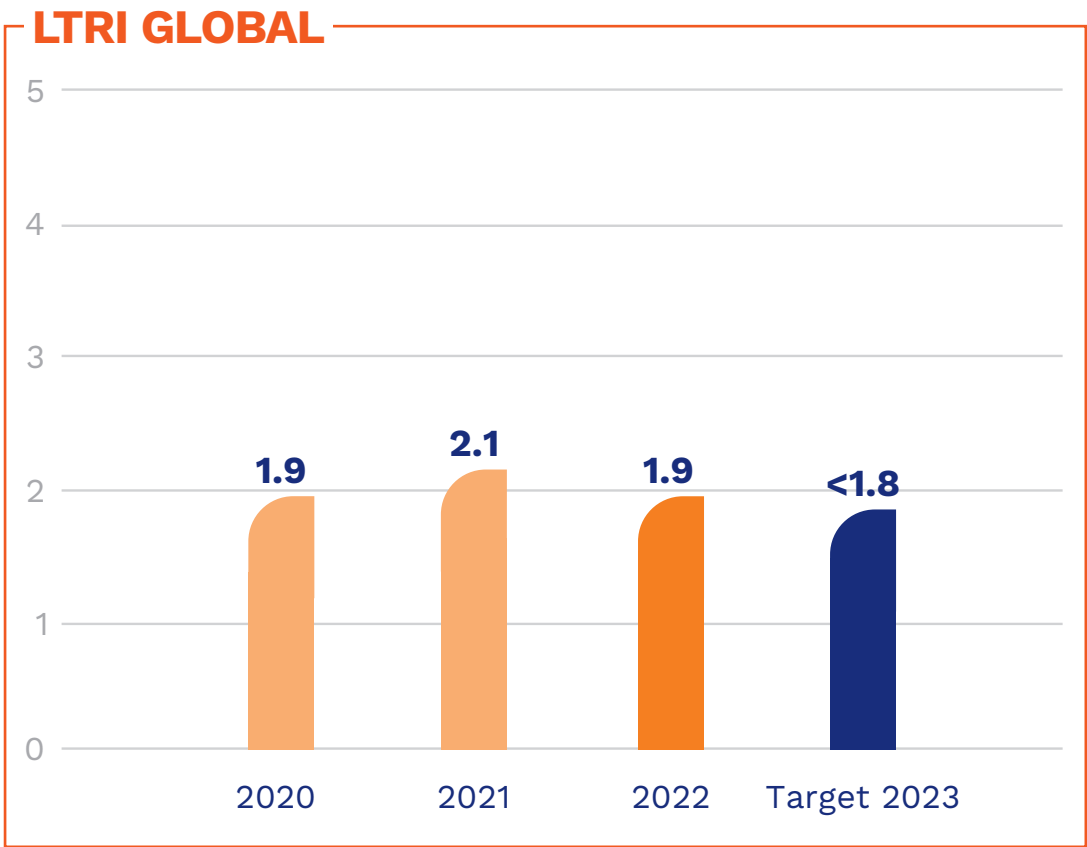
## Main mitigation, prevention and monitoring measures implemented

### Deployment of the Health and Safety Policy

To prevent and mitigate risks of serious harm to the health and safety of its employees and sub-contractors working on its sites, the Group relies on **a Health and Safety policy adopted in 2018 and updated in 2021**. This Group policy applies to all the companies controlled by the EDF group, in all the countries in which EDF operates. It concerns both its employees and its subcontractors.

The priorities of the policy are primarily to eradicate serious and fatal accidents, and secondarily to reduce the number of accidents and to fight against absenteeism.

The policy aims to anchor throughout the Group the foundation formed by the Group’s 10 key rules and the BEST (“Building Excellence in Safety Together”) health and safety management reference framework, enhanced with new practices that have proved their worth in several entities. This policy is accompanied by a roadmap that mobilises the Group’s entities to achieve the objectives set. The Executive Committee reviews health and safety figures and monitors action plans regularly.



### Further details on work-related accidents and occupational illnesses

	2020	2021	2022
<b>Employees</b>			
LTIR Group employees	1.4	1.7	1.6
Employee work-related accidents with at least one lost day	351	432	404
Accident severity rate	0.13	0.16	0.16
Occupational illnesses	41	40	52
<b>Subcontractors</b>			
Subcontractor LTIR	2.6	2.6	2.2
Subcontractor work-related accidents with at least one lost day	483	513	450

**10 key rules were identified** following an analysis of fatal accidents in the EDF group over the last 30 years. The review organised in 2021 by the Health and Safety Strategic Committee showed that 100% of the Group’s scope had carried out a self-assessment of its health and safety management system according to the BEST reference framework. In October 2022, the Strategic Health & Safety Committee conducted **a specific review of Health & Safety requirements regarding relationships with service providers**, highlighting the progress made by entities. Among other measures, this review led to the publication of an action plan on how to take greater account of health & safety in the purchasing process.

When safety conditions related to key rules are not met, a “NoGo” must be activated to correct the situation before starting. In the same way, when unforeseen circumstances no longer allow

the safety rules to be respected, a “safety STOP” should be marked. On 13 October 2022, a pause was observed throughout the Group for each team to discuss how to adapt the new policy to their own situation and ensure its adoption. Service providers are included and involved in major engagement and awareness events organised by the Group.

In order to ensure the continuous improvement loop, and to maintain risk awareness, **High-Potential Events (HPE) are collected**, analysed, and shared throughout the Group. Nearly 72% of these HPEs are near-misses or dangerous situations. Particular emphasis is placed on those related to the Group’s 10 key rules. In 2022, the safety criterion of the EDF profit-sharing agreement focused on developing analyses of accidents requiring shutdown and reducing the number of accidents classified as HPE requiring shutdown





or not. Moreover, audits are carried out each year throughout the Group, in particular in the form of site visits. These visits are written up in a site visit report shared locally with the audited teams.

### A framework for progress on the subject of health

EDF is committed to improving the physical and psychological health of its employees at work: both on-site and remotely. Making progress in this field requires the long-term involvement of medical teams, social workers, social partners, managers, prevention specialists and human resources managers in a multidisciplinary approach.

**Prevention of anxiety- and depression-related disorders, stress and musculoskeletal disorders (MSD)**, the three main causes of absenteeism, are regularly targeted by prevention initiatives. The development of team empowerment projects also led to a significant drop in absenteeism among the employees of the teams involved, due to the positive health impacts of the improved quality of life in the groups and the increased levels of commitment.

This approach is illustrated by the social agreements that include a large part of health. Accordingly, **there were further changes to work management and organisation methods in 2022**, particularly based on changes introduced during the sanitary crisis and the roll-out of the company-wide agreements signed in 2021 at various Group companies. The aim of this change is to find a fresh balance between research and performance, increase group cohesion, and develop the well-being of every employee.

For EDF, a **“*Travailler Autrement, Manager Autrement*” (“Work Differently, Manage Differently”)** agreement was signed at the end of 2021. This global agreement includes a process to make teams accountable plus new working arrangements (updating of the coherence framework for remote working with a maximum of 10 days/month of remote working authorised, increasingly flexible hours by adjusting working hours to best meet employees’ needs if necessary, provided the work team’s level of performance is unaffected, starting work straight on site).

To assist staff with this change, the Group also set up **2 financial aid schemes for remote working**:

- an allowance of up to €20/month (employer contribution to home occupancy fees),
- help with purchasing hardware to work remotely under good conditions.

EDF also raised awareness among its employees on how to adjust their behaviour and posture when working remotely by publishing **a health & safety guide issued in accordance with the “Work Differently, Manage Differently” agreement**. Awareness-raising activities are regularly organised to continue the prevention of cardiovascular risk, a major cause of death by heart attack, as well as the prevention of addictions, including the implementation of drug testing.

The operational departments’ risk assessments take into account musculoskeletal disorders and exposure to noise, hazardous chemicals, ionising and electromagnetic radiation, and biological agents, depending on the nature of their activities, and they implement local measures to prevent occupational illness. Based on its assessments, Framatome developed exoskeletons to reduce both hard working conditions and their impacts on musculoskeletal disorders.

The **prevention of psycho-social and socio-organisational risks** is based on the use of the employee perception survey (MyEDF) read at all levels of the organisation, providing a precise risk assessment highlighting the strengths of the organisation and team, as well as its weaknesses. This makes it possible to establish local action plans adapted to the situations encountered.

The EDF group has drawn up a guide for its entities so that they can develop the retention and return to work of employees who may have experienced health problems. This approach, which is based on the implementation of pre-return visits with medical teams and the holding of return interviews between employees and managers, is aimed at preventing the risk of occupational deintegration.

### Safety of nuclear and hydropower facilities

#### Nuclear facilities

The operational safety of nuclear facilities is taken into consideration from the initial design stage, and is regularly monitored, together with the implementation of an employee motivation policy and large-scale investment programmes. **The Group’s nuclear safety policy, redefined in 2021**, is incorporated into training for both EDF employees and subcontractors.





Nuclear safety is subject to internal controls (annual reviews, internal control plans and nuclear inspection audits in France) and external controls (peer reviews between corporate members of WANO and OSART audits) conducted by experts from the International Atomic Energy Agency (IAEA).

In France, the safety of nuclear facilities is controlled by the ASN (French Nuclear Safety Authority). In the UK, the Office for nuclear regulation (ONR) is the independent safety regulator in the civil nuclear sector. It monitors compliance with safety rules, including for the transport of radioactive materials.

Given the importance of the nuclear safety issue, **clear and transparent information and communication on events and their possible impacts** are promoted within the Group. This quality dialogue is sought and maintained with employees and their representatives, subcontractors, regulatory bodies (ASN and ONR), local authorities and all other stakeholders in nuclear safety.

The Nuclear Safety Council, chaired by the Chairman & Chief Executive Officer of EDF, meets several times a year and periodically reviews the annual nuclear safety assessment for the EDF group. A General Inspector for nuclear safety and

radiation protection (IGSNR) is appointed by the Chairman & Chief Executive Officer to whom he/she reports. He/she carries out inspection assignments for all of the nuclear activities of the EDF group. Each year, he/she issues an opinion on safety within EDF. The report is presented to and discussed by the Nuclear Safety Council. It is then made public.

#### Handling of stress corrosion detected on the auxiliary circuits of a number of nuclear reactors

On the occasion of the scheduled controls during the ten-year inspection of the Civaux 1 reactor in late 2021, stress corrosion was identified on parts of the pipework in the reactor's main primary circuit's auxiliary circuits. EDF immediately carried out inspections and expert appraisals of the 4 series making up the French nuclear fleet (900MW, 1,300MW-P4, 1,300MW-P'4 and N4).

In 2022, over 112 metallurgical expert appraisals were performed on pipework samples, a new inspection method using ultrasound was developed, and a strategy to repair welds affected by the phenomenon in question was implemented after instruction by the French Nuclear Safety Authority (ASN). Out of the 56 reactors in the nuclear fleet, 40 were identified as being

not vulnerable or only slightly vulnerable to the phenomenon of stress corrosion. These are the thirty-two 900MW series and the eight 1,300MW-P4 series reactors. 16 reactors were identified as being vulnerable or highly vulnerable to the phenomenon of stress corrosion: the twelve 1,300MW-P'4 series reactors and the four N4 series reactors. In 2022, sections of pipework were replaced on 10 reactors. 6 other reactors should be treated in 2023 with the preventive replacement of the potentially impacted lines. From 1 January 2023 onwards, EDF has included stress corrosion inspections using the improved ultrasound technology as part of its preventive maintenance plan.

#### Hydraulic facilities

Hydropower safety aims to limit risks of structural failure, risks relating to the operation of facilities during times of flooding, as well as watercourse flow variations during operation. **The hydropower safety policy aims for a high level of safety and continuous improvement.**

EDF performs regular monitoring and maintenance of dams, contributing to hydropower safety. Hydropower safety comprises all the measures taken when designing and operating hydropower plants to reduce risks and hazards to people and

property associated with water and the presence or operation of facilities. Hydropower safety is a major and permanent concern of the producer.

It involves three main activities:

- **the management of operational risks**, by providing information to users (communication campaigns, information of the employees operating on waterways, hiring “hydro-guides” during the summer months) about changes to water levels or flow fluctuations in downstream waterways;
- **the management of facilities during periods of exceptionally high water levels** in order to ensure safety at the facilities and for the surrounding communities;
- **measures to address the major risk associated with dam or reservoir failures**, through the regular monitoring and maintenance of facilities under the supervision of public authorities. In France<sup>31</sup>, a danger study is on each 240 class A and B dam, conducted every ten or fifteen years for class A dam and class B dam respectively. These studies consolidate an overview of the structures and associated countermeasures forming part of a risk mitigation procedure<sup>32</sup>. The 67 largest dams are subject to a special administrative procedure (“Special Intervention Plan”).

31. Metropolitan France and French overseas departments, regions, and collectivities, including wholly-owned subsidiaries.

32. For further details, see the annual report of the Inspector of Hydropower Safety, available on EDF's website.



## Air quality

The Group is fulfilling its commitments by closing coal-fired power plants. In parallel, the EDF group is continuing its process of modernising and improving the environmental performance of its thermal fleet, until it meets European best available techniques requirements. Regarding island systems, actions are taken to reduce NOx emissions, on a case-by-case basis: optimising exhaust gas processing, or reducing the number of hours of operation for certain turbines.

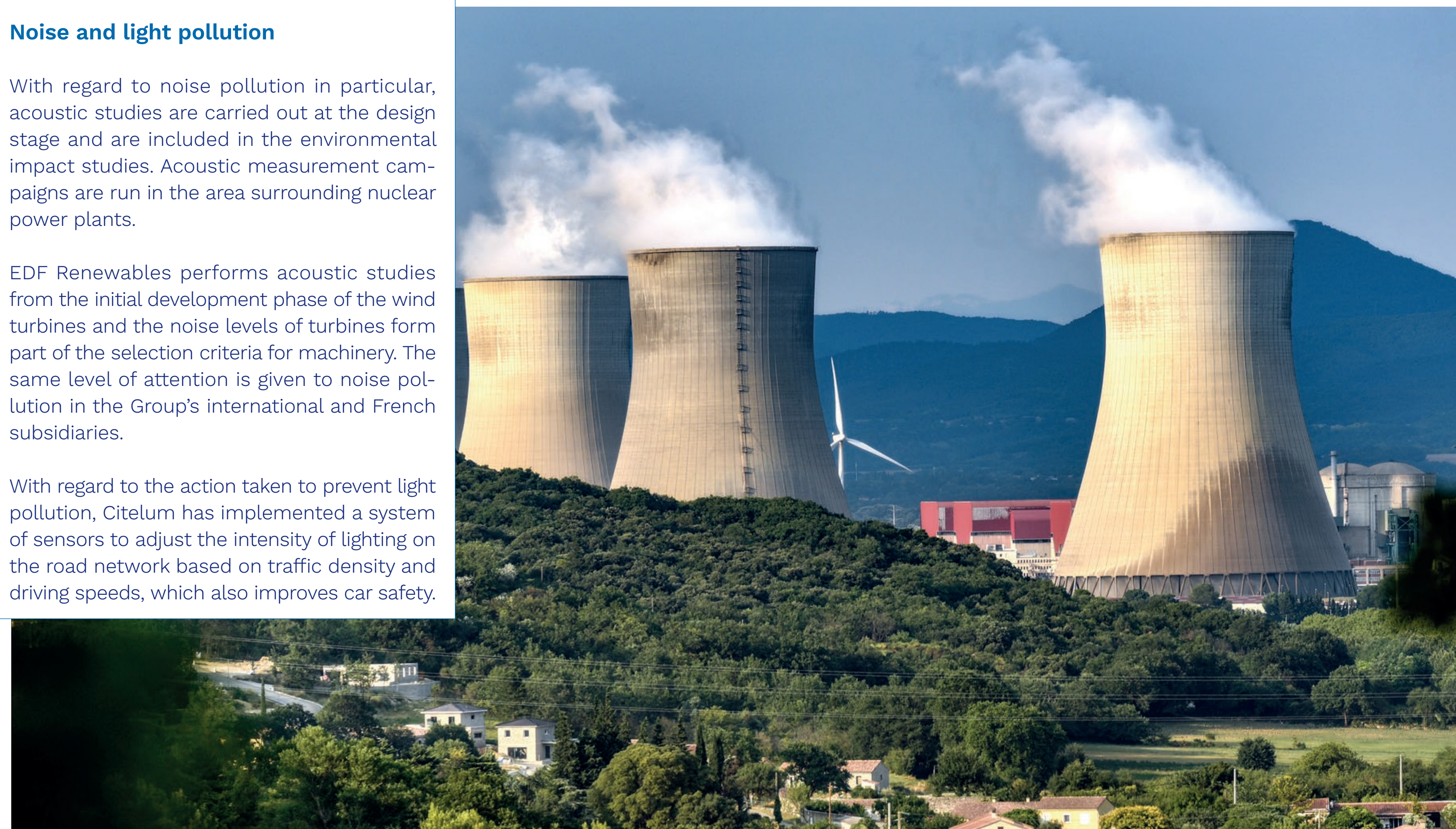
In Brazil, the emission levels of the Combined Gas Cycle power plant in Norte Fluminense are below NO<sub>x</sub> limit of 25ppm, mainly due to the high level of equipment maintenance. In Italy, the Marghera Levante power plant replaced less efficient facilities, and authorising not only increases in specific greenhouse gas emissions (up to 40%), but also a significant reduction in nitrogen oxide emissions (more than 50%) into the atmosphere.

## Noise and light pollution

With regard to noise pollution in particular, acoustic studies are carried out at the design stage and are included in the environmental impact studies. Acoustic measurement campaigns are run in the area surrounding nuclear power plants.

EDF Renewables performs acoustic studies from the initial development phase of the wind turbines and the noise levels of turbines form part of the selection criteria for machinery. The same level of attention is given to noise pollution in the Group's international and French subsidiaries.

With regard to the action taken to prevent light pollution, Citelum has implemented a system of sensors to adjust the intensity of lighting on the road network based on traffic density and driving speeds, which also improves car safety.





# Suppliers and subcontractors

## Methodology

The salient risks relating to the duty of vigilance concerning suppliers and subcontractors are identified on the basis of a risk map covering all of EDF’s purchasing categories within the scope of purchases covered by the Group Purchasing Department. The method takes into account all aspects of CSR (environment, working relations and conditions, human rights, ethics and compliance). Its ultimate aim is to determine the degree of residual risk and identify actions for the supplier.

**This risk analysis covers approximately 11,000 suppliers who have a contract with EDF.** More than 97% of its purchases are made in France and 99.4% in Europe<sup>33</sup>.

Risks are assessed per purchasing categories. The evaluation and prioritisation of risks is based on the activities of suppliers, and their geographical location is also a major factor in the assessment of risk.

## Identifying salient risks

Major risks have been identified in the various sectors of purchasing, mainly concerning safety, ethics, waste, the use of rare materials and human rights. 15% of the purchasing segments analysed are classified as having a major residual risk; 50% are classified as having a material residual risk and 35% are classified as having a low residual risk.

The largest procurement categories in financial terms for which major residual risks are deemed to remain include the following:

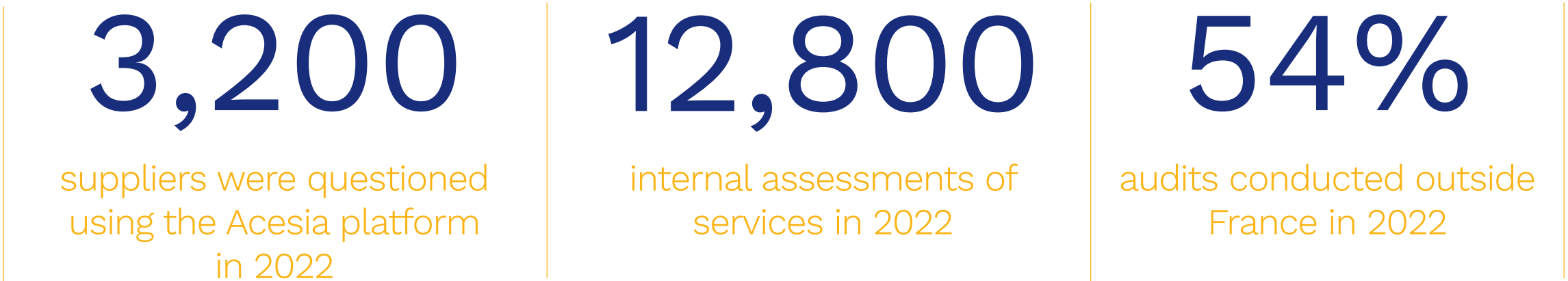
- IT and electronic services and materials regarding human rights risks in relation to the supply chain;
- work and maintenance services in an industrial environment regarding the increased safety risk;
- decommissioning/depollution services regarding environmental risk (waste production).

Some smaller categories are also included, such as airline ticketing.

Supply chain-related human rights risks featured in the risk map in areas including: textile

purchasing, computer hardware, and command control. This also applies to solar panels (forced labour risks).

## Monitoring indicators



33. European Union, Switzerland and the United Kingdom notably.



## Main prevention, mitigation and monitoring measures implemented

**The Group’s new supplier policy, adopted in 2021**, defines the shared principles that the senior managers of the various entities are responsible for implementing with regard to purchasing and contract management. It emphasises the Group’s CSR requirements and sets out the Group’s raison d’être and its commitments in terms of responsible purchasing, the use of companies employing disabled workers only, local presence, and supplier awareness.

Group commitments and obligations in respect of responsible procurement apply to every stage of the procurement process, including during prior supplier qualification, as well as during preparation of calls for tenders.

Even when these mechanisms are not directly applied, the Group major department or subsidiaries use equivalent methods of commitment adapted to their specific industrial or geographic characteristics.

EDF’s Group Purchasing Department takes CSR into account in its relations with its suppliers according to the principles of supplier commitments through:

## Climate and health & safety issues better taken into account in the purchasing process

In May 2022, as part of its adaptation of its raison d’être, the Group Purchasing Department decided to take further measures to tackle and focus on climate issues and natural resources in its purchasing process with prescribers and suppliers to reduce carbon emissions and preserve natural resources. Its main goals are to:

- **take account of sustainability issues upstream** from the launch of invitations to tender based on lifecycle cost analysis;

- **set up a coal and resources incentive system** for our suppliers;
- **get Group Purchasing Department staff engaged** with these key issues.

This project particularly includes assisting EDF’s supply chain to “go low-carbon”, helping prescribers to take account of these issues upstream from purchasing, and creating the tools needed to cover the purchasing process from A to Z.

**Validation of a compliance commitment** for all bidders (mandatory to respond to the call for tenders) covers the following areas:

- \_ corruption,
- \_ money laundering and the funding of terrorism,
- \_ the absence of any conflict of interest.
- \_ the requirements of the Duty of Vigilance Law.

**Incorporation of CSR criteria in tenders**, including specific criteria in the specifications on the basis of the risks identified for each type of contract and/or to address Group CSR aspirations such as the use of sheltered workshops, local engagement, and the inclusion of SMEs in the supplier panel

**Development of Productivity Partnerships**

**Integration of a CSR clause** covering environmental, human rights and health and safety commitments in the General Purchasing Conditions

**Systematic inclusion of a CSR Charter between EDF and its suppliers** as a contract document, updated on December 2022 to add the Group’s raison d’être and CSR commitments made by the Group, as well as to take better account of the duty of vigilance

**Ensuring these principles are upheld** by suppliers





Furthermore, following the EXCOM of 21 March 2022, it was decided that every business must require that **a high level of health & safety standards be met when selecting businesses** and that these standards must be increased at every stage of the purchasing process. To do so, an approach has been developed for each health & safety issue per purchasing category to identify the most exposed categories (e.g., rotating machine maintenance) in order to take appropriate actions such as including standards in specifications, and suitability and/or admissibility criteria, and criteria in technical ratings.

## Supplier assessments

The monitoring of suppliers, which includes a CSR component, begins with an internal evaluation of the services they provide. Supplier monitoring is mainly carried out by the business line or Contract Management, which uses Performance Assessment Sheets and Supplier Assessment Sheets.

**Document audits are completed by the supplier** and are always (and independently) checked by the AFNOR teams. Questionnaires cover the entire scope of CSR; some are custom-designed to take issues specific to a given category into account. In 2021, it is mainly the suppliers in the

risk categories (mobility and service providers working on nuclear sites) that have been questioned. It should be noted that suppliers were also interviewed at the request of Purchasing Category Managers (accommodations).

**At the end of 2021, a special human rights questionnaire was developed with AFNOR** and sent in 2022 to all suppliers with a contract in force, in the purchasing categories mentioned in international reports on the non-compliance with human rights or expressly mentioned by these reports, in the fields of textiles, computer equipment, control devices, and IT. In terms of solar panel purchases, EDF Renewables also sent out a questionnaire focusing on Human Rights to its suppliers in 2021: all surveyed suppliers provided a Human Rights policy and a purchasing code of conduct.

At the end of 2022, **3,200 suppliers were questioned using the ACESIA platform**, and nearly a thousand of them have been controlled. The assessments were “satisfactory” for 34% of the audited questionnaires. The suppliers to be assessed are mainly selected based on the supplier risk mapping and the needs of buyers and business lines, on the contracts in progress.

This tool makes it possible for purchasers and suppliers to share an approach of continuous improvement in Corporate Social and Environmental Responsibility.

**These on-site audits cover all CSR aspects:** environmental, social and ethical (in particular human rights) policies, commitments and practices. On-site supplier audits are conducted by external, independent providers. CSR audits are conducted based on supplier risk mapping and feedback capitalised by Procurement Category Managers on how contracts are executed, with the help of the business line entities.

These audits are designed to test the CSR commitments adopted and are conducted on site (head office or production site of the supplier or place of work at an EDF site).

In terms of organisation, 2022 was marked by audit postponements or cancellations due to geopolitical events (Russia-Ukraine crisis, instability in Burma, pandemic in China at the end of the year). 37 on-site CSR audits were conducted; 54% of which were outside France:

- 33.5% had a “satisfactory” result,
- 58.5% an “acceptable with comments” result,
- 8% an “insufficient” result: action plans were subsequently set up with suppliers and follow-up audits scheduled as necessary.

## “Work clothing” Audit campaign

A large proportion of CSR audits were carried out as part of a call for tenders for the “work-wear” category. Potential suppliers with audited production sites rated “Insufficient” or “Unsatisfactory” overall were ruled out of the supply chain selection process. In 2022, the declared secondary chain sub-contractors of suppliers selected in 2021 were audited. Only sub-contractors with a “Satisfactory” or “Acceptable” result can be included in secondary supply chain.

The results of this campaign show that environmental and societal impacts were better taken into account, particularly compared to the similar initial campaign back in 2014. There was only one “Insufficient” result. Several businesses have demonstrated their determination to minimise their environmental impact: OEKO-TEX certification prioritised or obtained, reduced use of chemicals, energy management, etc.





## Regarding audits conducted on other purchasing categories

Upstream from an invitation to tender regarding manufacturing of GRP piping, potential tenderers were audited to confirm the compliance of their practices with minimum expected CSR prerequisites. In case of an unsatisfactory or insufficient result, an action plan must be set up: if necessary, an inspection audit is also required before the contract can be awarded.

Across all purchasing categories, as in previous years, overall results for 2022 indicated appropriate management of safety and

environment-related operational risks, due mainly to certification providing a framework and a robust safety culture. Environmental impact was also found to have also been better taken into account: carbon offsetting, use of the local economy, presence of CSR indicators/goals.

However, several audited businesses did not have a code of ethics or anti-corruption policy. The other area for improvement was once more taking account of CSR criteria in successful bidders' own supply chains, even if some good practices were identified this year. EDF's requirements on these matters are still to be promoted in the audited companies.

## Awareness Raising and Training

The Purchasing Department and Impact Department organise awareness campaigns and training sessions for purchasers and prescribers focusing on responsible purchasing processes. In 2022, a training day was held along with 2 virtual classes aimed at people working in the CSR field at Group business lines and entities.

In addition, **in late 2022 an e-learning course was created and released Group-wide** to raise awareness of the Responsible Purchasing process.

Each of these training courses and awareness campaigns makes clear and explains the connection with the duty of vigilance.

## Coal procurement

In the coal supply chain, EDF no longer has direct contractual relations with mining companies or the market but remains an active supporter of Bettercoal<sup>34</sup> – the initiative for responsible coal purchases of which EDF is a founding member. The operational approach is based on a code that sets out ethical, corporate and environmental principles and provisions relevant to mining companies. It takes into account general performance requirements, including management systems, and also performance requirements concerning:

- ethics and transparency,
- human and labour rights (such as the prevention of forced and child labour, the right to a decent wage),
- social issues, including health and safety,
- the environment.

JERA Trading, its supplier, is now a member of Bettercoal, thus increasing the initiative's influence in Asia.

In 2022, 24% of the EDF group coal supplies from JERAT were sourced from operators who had adopted the Bettercoal initiative, 28% from North-American operators and 48% from other global producers. This reduction was particularly due to the suspension of imports from Russia and use of alternative suppliers from producing countries not signed up to the Bettercoal initiative. However, Bettercoal is currently in discussions with several of these producers to sign them up in 2023.

## Uranium procurement

Concerning uranium supply chain, EDF obtains its uranium supplies over the long term under diversified contracts in terms of origin and suppliers, in most of the main producing countries (Australia, United States, Canada, Kazakhstan, etc.).



34. bettercoal.org



The clauses authorising the completion of audits and setting out EDF's expectations in terms of enforcement of the fundamental rights and main international standards by suppliers and sub-contractors have progressively been added to contracts. The uranium mine audit system used by EDF since 2011 ensures that the ore is extracted and processed in good environmental, social and societal conditions.

The method and the evaluation grid were developed with WNA (World Nuclear Association). This method is based on international standards, including The World Nuclear Association's Sustaining Global Best Practices in Uranium Mining and Processing: Principles for Managing Radiation, Health and Safety, and Waste and the Environment, The Global reporting Initiative's (GRI), Sustainability reporting Guidelines & Mining and Metals Sector Supplement, and The International Council on Mining and Metals' (ICMM) Sustainable Development Framework.

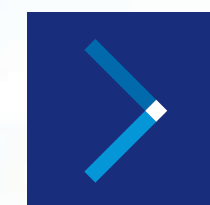
The issue of safety, which is particularly critical in mining (process safety), consists of a standardised

framework recognised by all those involved in the sector. These standards take account of the issue of human rights and fundamental liberties (human rights, whistleblowing register, rights of native peoples, radiation protection), personal health & safety, and the environment, including in the broadest sense of the term (greenhouse gases, water, biodiversity, waste postextraction site rehabilitation).

Every year, EDF carries out mine audits through internal means (2 audits per year). The reports present the main strengths, recommendations and suggestions. The most ordinary ones relate to health and safety (wearing personal protective equipment such as gloves or goggles), the display of safety instructions, monitoring accidents, performing radiological controls, monitoring environmental footprint (specifically carbon emissions) and proposals relating to well-being in the workplace. Audit recommendations are included in the continuous improvement plans and action plans. There were two uranium mine audits in 2022.







# 3.

## Whistleblowing and monitoring



# Group whistleblowing system

The EDF group whistleblowing system consists of a single reporting system for all wrongdoing reported under the Sapin II Act and the “Duty of Vigilance” Act as well as wrongdoing reported by employees alleging harassment and discrimination.

## Scope

In late 2022, following the transposition into French law of the European directive on the protection of whistleblowers, in the form of the “Waserman Act”, which came into force on 1 September 2022, EDF began working on a new whistleblowing procedure to take account of the broader definition of “whistleblower” status.

This Group system benefits all Group entities, except for Enedis and RTE<sup>35</sup>, which have their own whistleblowing system.

## Whistleblowing system

Whistleblowers may choose to use the Group whistleblowing system or the other channels available to them (manager, human resources, staff representatives, local ethics and compliance officers, mediators etc.).

The Group whistleblowing system, managed from an independent platform, may be **accessed at any time via the EDF group website**, in French, English, Italian, Portuguese, Dutch and Mandarin, in France or abroad. The whistleblower can report in the language of their choice.

In order to comply with the requirements of the Sapin II and Duty of Vigilance laws, EDF has taken appropriate measures to **guarantee the strict confidentiality of the personal data of whistleblowers**, of those implicated or cited, and of the facts reported, in particular by setting up a whistleblowing system hosted on a dedicated, secure external platform.

The Group whistleblowing system allows Group employees and external staff (temporary workers, service provider employees, etc.) or occasional employees (fixed-term contracts, apprentices, trainees, etc.), as well as third parties, to report

wrongdoing of which the EDF group or its staff are the culprits or victims.

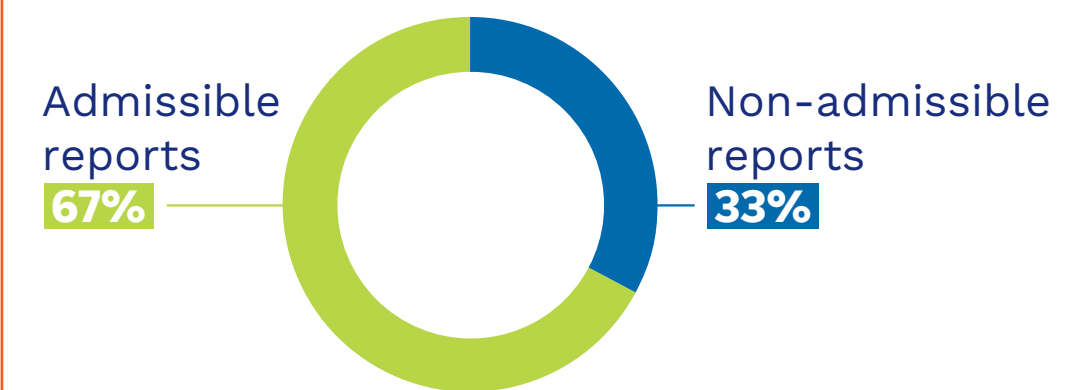
## Whistleblowing alerts in 2022

In 2022, within the Group (via the Group system or any other channel), **305 admissible alerts were recorded** (including 63 in the Group alert system). 224 were about incidents occurring in France and 81 abroad. 133 related to EDF and 172 to

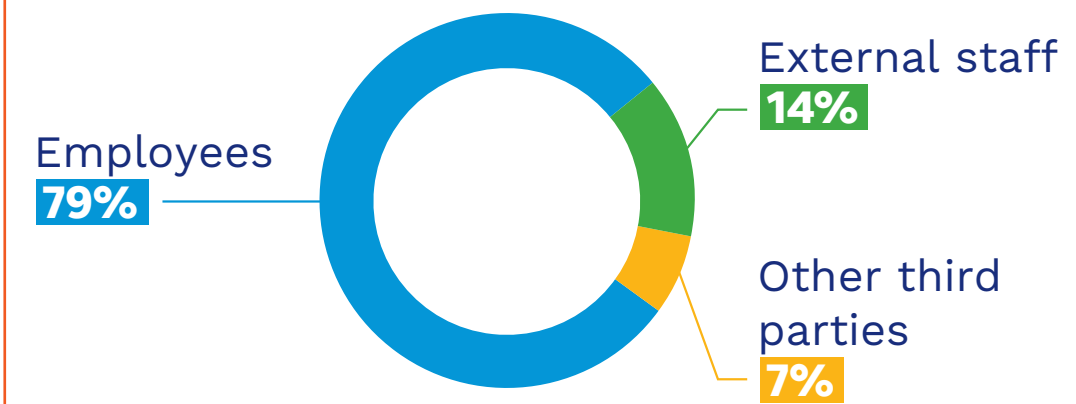
Group subsidiaries. 52% cases reported relates to harassment/discrimination.

In 2022, 68% the alerts handled were sufficiently detailed to result in corrective action or disciplinary sanctions (in particular, 9 dismissals following proven acts of harassment-discrimination). In 31% of the cases where the facts were not proven, action to improve the relevant processes was still taken.

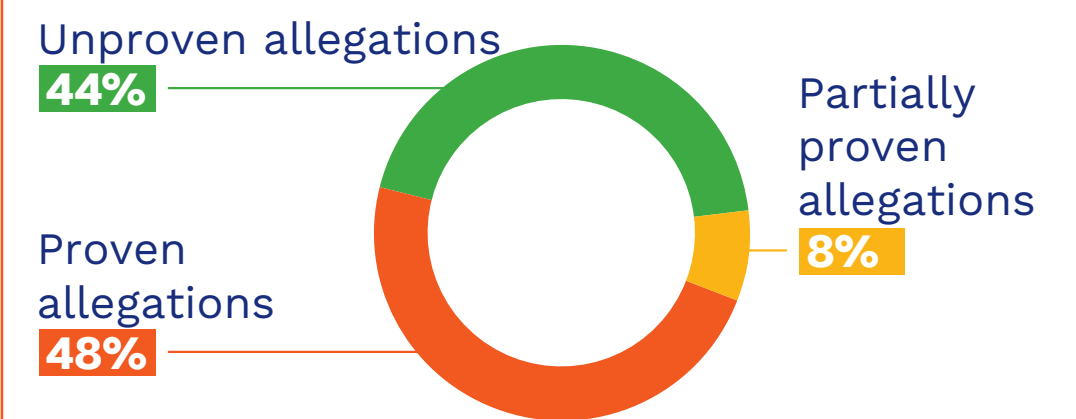
ADMISSIBILITY OF REPORTS IN THE GROUP'S WHISTLEBLOWING SYSTEM



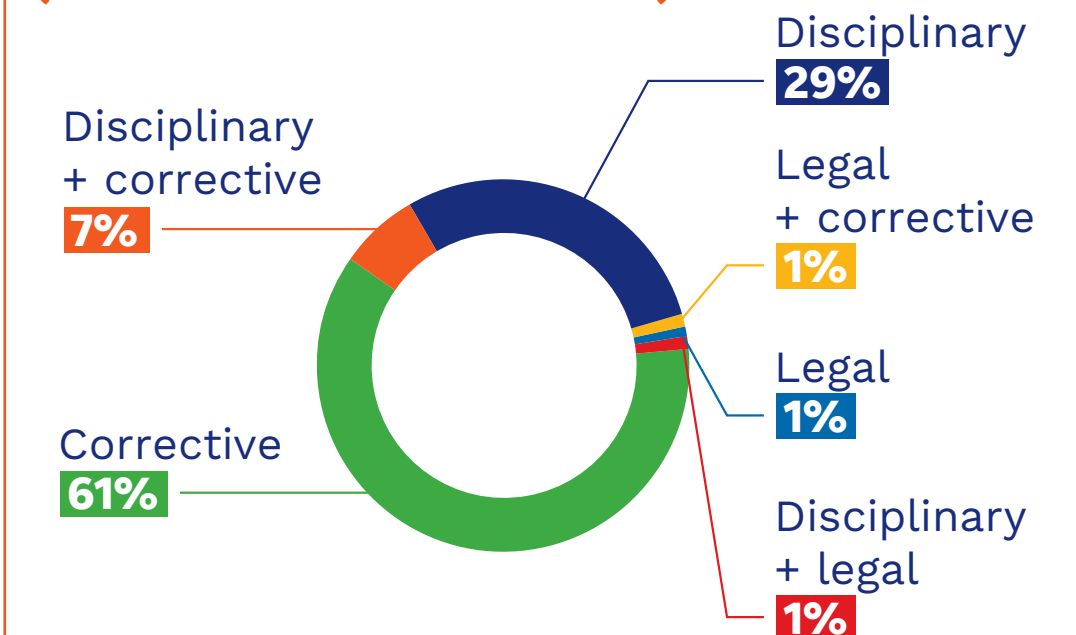
RELATIONSHIP OF WHISTLEBLOWERS WITH THE GROUP (ALL CHANNELS COMBINED)



RESULTS OF INVESTIGATIONS FOLLOWING ALERTS (ALL CHANNELS COMBINED)



ACTIONS TAKEN FOLLOWING ALERTS (ALL CHANNELS COMBINED)



35. Distribution network operator Enedis and transmission operator RTE are managed independently.

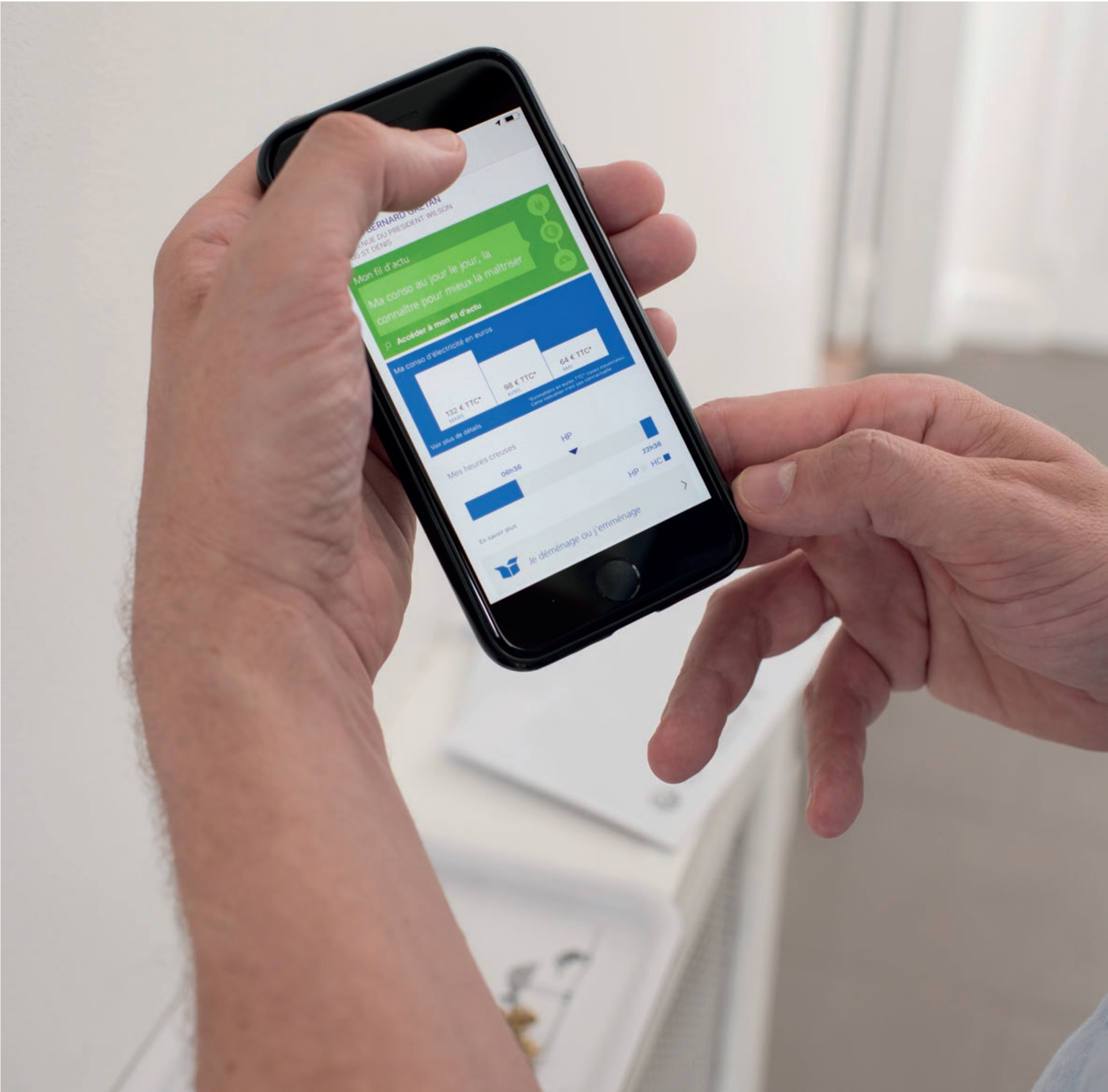


# Monitoring procedure

The Group’s vigilance mission is committed to developing the Vigilance Plan’s monitoring system as part of a continuous improvement process. This system is based on the operational action plan, which is monitored by the Steering Committee. This action plan is regularly presented to the CDRS (see p.11).

The assessment of the system is included in the annual internal control plan, and a dedicated risk sheet on due diligence has been drawn up and implemented. It allows entities to self-assess whether or not they meet duty of vigilance requirements. Furthermore, internal control in this field was increased with two “essential progress actions” to be implemented at entities in 2022:

- **raising awareness among all relevant managers and project managers**, via a dedicated e-learning course;
- **the other involved analysing salient risks** at each entity.





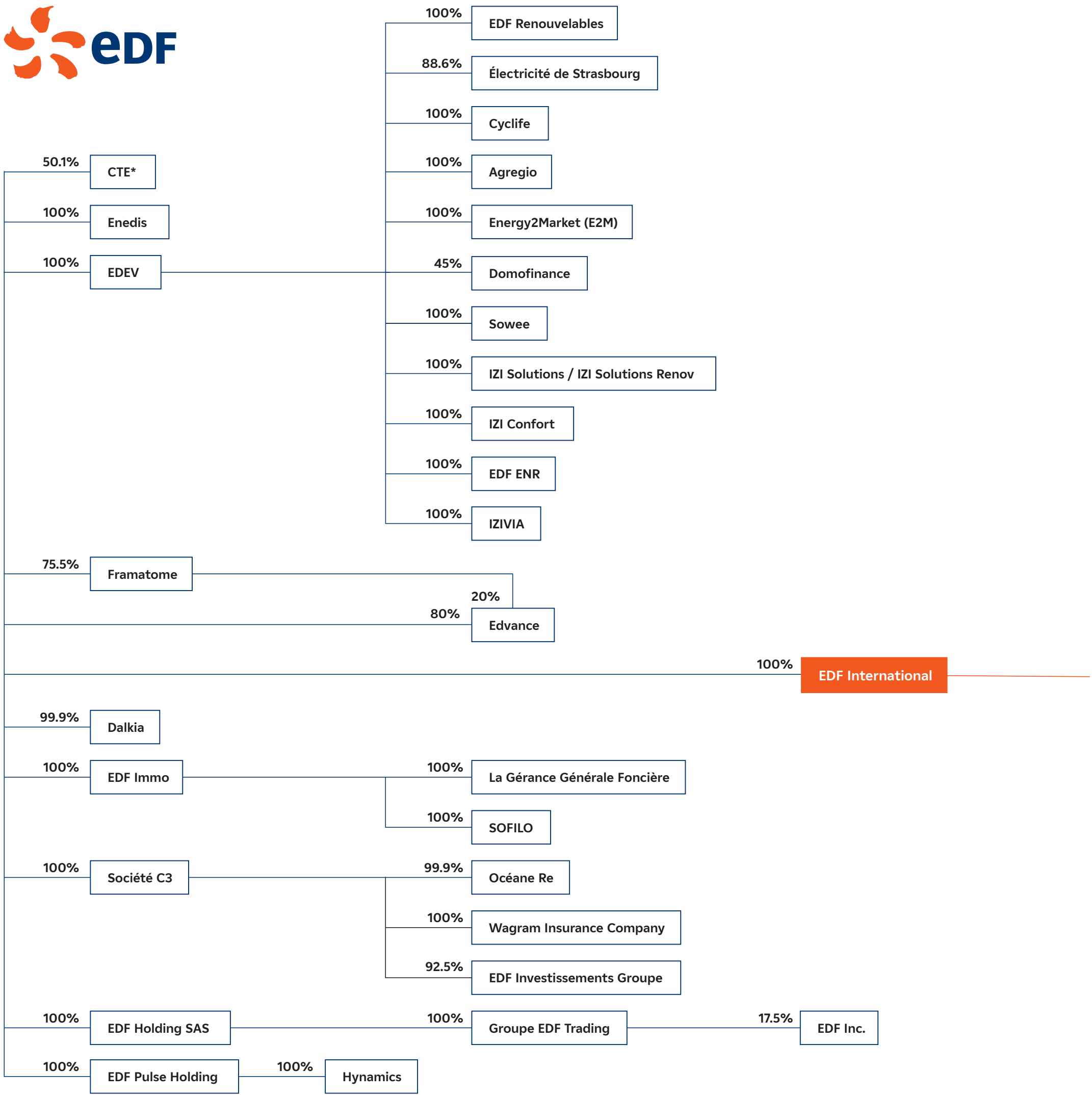


# 4.

## Appendices



# Organisation of the Group



\* Coentreprise de Transport d'Electricité or CTE, the company holding 100% of RTE.



# Concordance table with the Universal Registration Document

EDF’s Vigilance Plan reports on the various steps taken for each of the Group’s CSR issues and commitments throughout chapter 3 of the Universal Registration Document.

Salient risks related to the duty of vigilance			Stakes and commitments of the EDF group	
Area	Type of risk	Risk	Descriptions of the 2022 mitigations and actions in the different sections of the DPEF	
Human rights and fundamental freedoms	Transverse	Risks related to harassment and discrimination	Sections 3.3.3 “Equality, diversity and inclusion” and 3.3.4 “Energy poverty and social innovation”	
	Activities and projects	Risk of infringement of the rights of communities, indigenous peoples and vulnerable groups: these risks are linked in particular to land issues and population displacements or to consultations with indigenous populations that may prove insufficient given the complexity of the consultation process with indigenous populations (or ethnic minorities) or the management of this process in whole or in part carried out by an administration thus limiting EDF’s control over this risk.	Section 3.3.2.3 “Human Rights”	Sections 3.4.1 “Dialogue and consultation with stakeholders” and 3.3.2.4 “The EDF group whistleblowing procedure”

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Access the Universal Registration Document



Salient risks related to the duty of vigilance			Stakes and commitments of the EDF group	
Area	Type of risk	Risk	Descriptions of the 2022 mitigations and actions in the different sections of the DPEF	
Human rights and fundamental freedoms	Activities and projects	Risk of infringement of workers’ rights including risks related to decent working conditions at the Group’s construction sites.	Section 3.3.2.3 “Human rights”	Sections 3.4.1 “Dialogue and consultation with stakeholders” and 3.3.2.4 “The EDF group whistleblowing procedure”
		Risks related to the use of security forces for projects near conflict zones or security regimes.		
Environment	Transverse	Climate impact: the climate change and greenhouse gas emission.	Section 3.1 “Carbon neutrality and the climate”	Sections 3.4.1 “Dialogue and consultation with stakeholders” and 3.3.2.4 “The EDF group whistleblowing procedure”
		EDF impact on air, water, soils, biodiversity and waster production.	Section 3.2 “Preserving the planet’s resources”	



Salient risks related to the duty of vigilance			Stakes and commitments of the EDF group	
Area	Type of risk	Risk	Descriptions of the 2022 mitigations and actions in the different sections of the DPEF	
Health-Safety	Employees and subcontractors	Work-related accidents, work-related diseases (asbestos, chemicals, ionizing radiation and noise).	Section 3.3.1 “Security, health and safety	Sections 3.4.1 “Dialogue and consultation with stakeholders” and 3.3.2.4 “The EDF group whistleblowing procedure”
		Musculoskeletal disorders, anxiety-depressive disorders, including stress.		
	Consumers and residents	The safety of nuclear and hydraulic facilities.	Sections 3.3.1.1 “Nuclear safety” and 3.3.1.2 “Hydropower safety”	
		Air quality, noise and acoustic nuisance.	Sections 3.3.1.6 “Air quality” and 3.3.1.4 “Consumer health and safety”	



Salient risks related to the duty of vigilance			Stakes and commitments of the EDF group	
Area	Type of risk	Risk	Descriptions of the 2022 mitigations and actions in the different sections of the DPEF	
Suppliers	Purchase category	IT and electronic services and materials regarding human rights risks in relation to the supply chain.	Sections 3.4.2.3 “Contribution to development through purchasing” and 3.3.2.3.4 “Implementation of human rights commitments”	Sections 3.4.1 “Dialogue and consultation with stakeholders” and 3.3.2.4 “The EDF group whistleblowing procedure”
		Work and maintenance services in an industrial environment regarding the increased safety risk.	Section 3.4.2.3 “Contribution to development through purchasing”	
		Decommissioning/depollution services regarding environmental risk (waste production).		
	Specific	In 2022, the risks of human rights and in particular of forced labour in connection with the supply chain were clarified in the areas of procurement of IT and instrumentation & control, textiles and solar panels regarding forced labour risks.	Sections 3.4.2.3 “Contribution to development through purchasing” and 3.3.2.3.4 “Implementation of human rights commitments”	





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Designed & published by  LABRADOR