

#### European Affairs Division

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#### Foreword

The year 2024 was a period of transition, with the European elections, the Commissioners' hearings, and the new European Commission taking office on 1 December. These events had an influence on our working environment and our strategic priorities.

We kicked off the year with a New Year's event to present our priorities, emphasising the electrification of uses, the complementary nature of renewable energies and nuclear power, as well as the need for a global, optimised approach to the power system.

At an event held in Brussels in March 2024, EDF made its first public presentation of its scenario for decarbonising Europe by 2050. We shared the results of this scenario widely with European institutions and our stakeholders in order to emphasise the key role of electrification and the importance of a systemic approach. In particular, we shared our analyses on the flexibility of nuclear power and the need to electrify uses with think tanks, in line with the Group's internal work and Ambitions 2035 targets.

#### Marion Labatut, EDF EU Affairs Director

Our "Learn and Lunch" training sessions with experts from EDF R&D, aimed at our contacts, enabled us to share valuable knowledge. We resumed contact with MEPs and the institutions, in particular the Commissioners' cabinets. All these actions reflect our commitment to drive the energy transition and ensure a sustainable future.

The year 2024 also saw major changes in the associations. Xavier Ursat, Senior Executive VP for the Strategy, Technologies, Innovation and Development, was elected President of Nucleareurope, and EDF experts headed working groups at Eurelectric, with 2024 marking EDF's return to Solar Power Europe.

2024 was also marked by several visits made by EDF's CEO to Brussels to meet high-level decision-makers.







## European Union lobbying principles

promoting and defending the company's interests through its representatives within European institutions, such as the European Commission, the European Parliament, and the Permanent Representations of Member States. The objective is to directly or indirectly influence

proposals or decisions that could affect the EU's climate and energy framework, as well as EDF's operations. This activity is guided by ethical values and adherence to laws and regulations, reflecting EDF's commitment to corporate responsibility.

EDF is engaged to conducting EU lobbying in a transparent and responsible manner. The company is officially registered in the EU Transparency Register (n°39966101835-69) and complies with its code of conduct (Annex 3 of the 2014 Interinstitutional Agreement) in dealings with EU institutions. A structured process is in place to ensure accountability, triggering follow-up actions as necessary. In some cases, this may lead to EDF withdrawing from certain organisations or considering new memberships. EDF also adheres to applicable international conventions, avoids dishonest or undue influence, and provides EU representatives and stakeholders with accurate, complete, and up-to-date information.

Moreover, EDF abides by its internal *Code of Ethics and Compliance*, titled "European Union Lobbying Principles", as well as its Responsible Advocacy Charter, This code of Ethics and Compliance document is displayed in EDF's premises and shared with new employees.

To reinforce ethical practices, EDF organizes dedicated meetings and issues

relevant materials, encouraging staff training on these topics. For example, in the area of anti-corruption, 100% of staff successfully completed an indepth internal anti-corruption program in 2024.

A new one is planned for the first quarter

of 2025.

"A dynamic process has been put in place which triggers – when needed – follow-up actions. Ultimately, the process may result in EDF opting out of some organisations, or considering joining new ones."





When lobbying the EU institutions, employees and representatives contracted by EDF must behave in a transparent and responsible manner, respecting the following principles:

- Identify themselves as EDF employees or as acting on behalf of EDF before engaging in a lobbying action or any public intervention;
- Develop arguments always based on reliable, verified and up-to-date information;
- Respect the positions of other stakeholders;
- Comply with EU laws, regulations, conventions etc. governing lobbying, and follow the codes of conduct of the institutions being lobbied;
- Communicate and defend positions that are in line with EDF's strategic framework and "raison d'être":
- Be identified by the European Affairs Division.

#### *They must never:*

- Attempt to influence the position of a public official by offering him or her undue advantages, or by encouraging a breach of the ethical rules of the institution;
- Use, for commercial or advertising purposes, information obtained from an EU institution, or sell copies of such information to third parties;
- Seek information or decisions dishonestly, or by use of undue pressure or inappropriate behaviour:
- Deceive or mislead third parties and/ or public officials, or claim any formal relationship with the EU or any of its institutions in their dealings with third parties.

#### EDF subscribes to:

- \* The Universal Declaration of Human Rights;
- \* The Convention on the Elimination of All Forms of Discrimination against Women;
- \* The International Convention on the Rights of the Child;
- \* The Convention of the Organisation for Economic Cooperation and Development on the fight against the corruption of foreign public agents in international commercial transactions;
- \* The Conventions of the International Labour Organisation guaranteeing the fundamental principles and rights of employment and tackling discrimination;
- \* The Guidelines of the Organisation for Economic Co-operation and Development for Multinationals;
- \* The United Nations Convention against Corruption;
- \* EDF's European Affairs Division monitors closely its engagement with trade associations and think tanks and in particular how closely their values align with EDF's "raison d'être".

# 2024 Lobbying Facts & Figures

Among global leaders in low-carbon energy, the EDF Group is active across the low-carbon energy value chain, from generation to retail, from energy efficiency to trading

EDF's activities are mainly located in Europe, which accounts for 90% of its turnover. EDF is the European leader in carbon-free electricity, being the largest EU nuclear and renewables producer.

Its electricity emits 30gCO<sub>3</sub>/kWh. The carbon intensity of electricity and heat generated by the EDF Group is approximately seven times lower than the European average (210 gCO<sub>2</sub>/kWh), and more than fifteen times lower than the global average (458 gCO<sub>2</sub>/kWh).

EDF Group supplies energy and services to approximately 40.9 million customers and generated consolidated sales of €118.7 billion in 2024.

In line with EU energy policies, EDF considers electrification as a major way forward to decarbonise the EU economy.

The EDF Group aims to champion lowcarbon growth and is committed to meeting the new expectations of customers, by offering them value-added goods and services.

In 2024, a budget of about 2 million euros was dedicated to representation activities of the EDF European Affairs division. EDF's responses to EU consultations are publicly available on the EU register. Moreover, EDF communicates publicly on its standpoints and messages on its key areas of interest on social media (LinkedIn & X). The main financial contribution of EDF European Affairs to think tanks in 2024 went to Bruegel (€52.500) and €30.000 to Florence School of Regulation (FSR).

In addition to these membership fees, the European Affairs Division financed dedicated actions in support of electrification of uses; supporting of Electrification of uses; promoting of low-carbon electricity generation, both nuclear and renewable, respecting technological neutrality; highlighting a comprehensive, optimised approach to Europe's power system; strengthening European competitiveness while preserving climate ambitions.

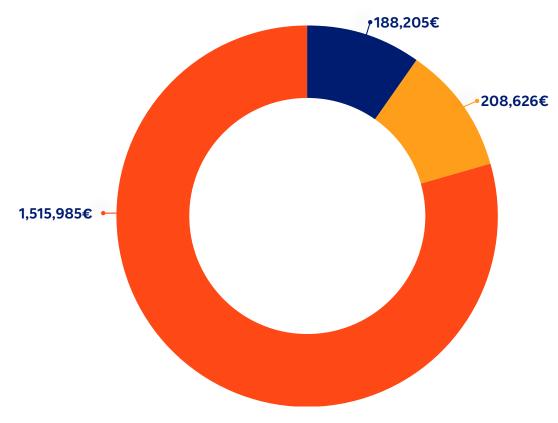
The main initiative that EDF EU Affairs supported in 2024 is a report on energy security with EPC (European Policy Centre) (50k€) and a report on the role of long term contracts with the Florence School of Regulation (122k€).

#### European Affairs budget

Trade associations membership, think tanks and studies

> (including European Energy Forum and Energy Solutions)

- **Events and communication**
- **Operating expenses**



Total 1,912,816€

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#### Communication

- \* 6-7 March: E-Vision Eurelectric event sponsorship. Speaker: Olivier Dubois Director, Electric Mobility, EDF Group. (budget €16k)
- \* 25-26 September: EHPA
  Heat&Pump Forum. Speaker:
  Frederic Fontan, Head of
  Regulation at EDF Customers,
  Services and Territories
  Division. (budget €10k)
- \* 4 December: sponsorship of Politico Sustainable Energy Week. Speaker: Luc Rémont, EDF's Chairman & Chief Executive Officer. (budget €50k)
- \* 12 December: sponsorship of the Energreen Deal Conference. Speaker: Marion Labatut, EDF's EU Affairs Director. (budget €10K)

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#### Challenges

The presentation of EDF's Net Zero 2050 scenario in March 2024 underlined the crucial importance of increasing the electrification of uses in all sectors in order to achieve climate targets. This transition is essential for reducing  $\mathrm{CO}_2$  emissions and promoting a sustainable economy.

#### **Activities**

In collaboration with numerous stakeholders such as Eurelectric and the Electrification Alliance, EDF called for a detailed action plan for electrification. This plan, including

## Electrification of uses for decarbonisation

indicative targets and specific progress indicators, was incorporated into the Energy Commissioner's mission statement, marking a significant step forward in our commitment.

EDF also carried out in-depth studies to identify specific barriers to electrification in the transport, building and industrial sectors.

In response to these challenges, EDF proposed the creation of an electrification bank to provide financial support for industrial electrification projects in

preparation for the Clean Industrial Deal to be proposed by the European Commission in early 2025. EDF CEO Luc Rémont shared this idea at Bruegel's annual conference in September 2024. It was taken up by numerous organisations, including those involved in the Antwerp dialogue. To round off the year, Luc Rémont took the message of electrification of uses to the Sustainable Energy Week organised by Politico in December 2024.

#### Outlook 2025

The European Commission has announced the adoption of an electrification action plan for early 2026. EDF will continue to advocate the prioritisation of electrification as a means of decarbonising industry, accompanied by clear targets and monitoring indicators.

EDF will also be asking for dedicated funding to support industry and the electrification of industrial processes.

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# Supporting the production of low-carbon electricity, both nuclear and renewable, respecting technological neutrality

#### Challenges

Decarbonising power generation is crucial to reducing  $\mathrm{CO}_2$  emissions and meeting climate targets. EDF is committed to promoting nuclear and renewable energy sources for sustainable and reliable electricity generation. Technological neutrality is a key demand of the Group: all European texts must be open to renewables and nuclear power, as well as renewable hydrogen and low-carbon hydrogen, with a view to complementarity. In line with the reform of electricity market design, we have

continued our work on the importance of long-term contracts, thus supporting the Florence School of Regulation's analyses on these subjects.

#### Activities

In April 2024, in partnership with Finnish company Fortum and Swedish company Vattenfall, EDF organised a high-level nuclear event, attended by Commissioner Breton and Executive Vice President Šefčovič, thus underlining its commitment to nuclear power. In March 2024, we took part in the international nuclear

summit in Brussels, strengthening our collaboration with international partners. We also contributed to the reshaping of the nucleareurope association, with the election of EDF's Group Senior Executive VP for the Strategy, Technologies, Innovation and Development, Xavier Ursat, as President in December 2024. Xavier Ursat has made several trips to Brussels to promote these messages, and spoke at the Friends of Europe event in October 2024 on these subjects. Hélène Chao, from the European Affairs Department (DAE), was also elected chairwoman of the nuclear working group of the European association

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Eurelectric. To raise awareness on EDF's production facilities, the DAE, in close collaboration with the Group's Nuclear Generation Division, organised several site visits for think tank researchers, MEPs and representatives of associations.

2024 also saw the return of EDF to the Solar Power Europe association, a key player in Brussels. This complements our commitment to renewable associations. such as Wind Europe, in order to continue work on speeding up the allowing and integration of renewable generation sources into the European power system. In 2024, EDF also continued its collaboration with Europe's eight largest hydropower companies within the European Hydropower Alliance (EUHA). Discussions were held with the European Commission (DG ENER) to reiterate the essential role of hydropower in the European electricity system for renewable generation, flexibility and storage. The development potential of hydropower and its contribution to the resilience of European water and power systems were also highlighted.

In terms of corporate governance and the environment, the DAE took advantage of 2024 to establish relations with various stakeholders active in these areas (NGOs, European Commission departments). Carine de Boissezon, EDF Group Impact Director, visited Brussels on several occasions to share EDF's actions and discuss possible improvements to the European framework. She spoke at several conferences, including the summit organised by the Corporate Leaders Group in December 2024.

#### Outlook 2025

As part of its new mandate, the European Commission will be proposing a series of texts, particularly concerning the Clean Industrial Deal and the Omnibus simplification package. It is important that these texts do not discriminate against nuclear power. EDF will defend a level playing field between nuclear and renewable energies in all texts so as to ensure that access to financing, long-term contracts and other facilities is granted and recognised on the same terms for all these technologies.

We will continue to work towards a regulatory framework for hydraulics that allows investment.

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## A comprehensive, optimised approach to europe's power system

#### Communication

- \* 21 March: presentation of **EDF's Net Zero 2050 scenario** in partnership with Euractiv. Speakers: Luc Rémont. **Chairman & Chief Executive** Officer, Charles Weymuller, Chief Economist, EDF Group. (Budget €22k)
- \* 15-17 October: EASE European **Storage Global Conference** sponsorship. Speakers: Antoine Bizet, **Deputy Director EU Affairs EDF**, **EDF** Group. (Budget €20k)

#### Challenges

The presentation of EDF's Net Zero 2050 scenario highlighted the importance of a global approach to minimising the costs of the European electricity system. Matching electricity supply and demand is essential for optimising costs and guaranteeing grid stability.

#### **Activities**

In 2024, the Bruegel Think Tank published a key report highlighting the importance analysis of the growing need for flexibility, both upstream and downstream. We

organised a number of events to raise awareness of the capabilities of French nuclear installations in terms of flexibility. In addition, two "Learn and Lunch" sessions with R&D were held to share scientific knowledge with our community-based and institutional stakeholders, reinforcing our commitment to optimised power system management. EDF continued and strengthened its activities within SMARTEN with the election of Hanae Chauvaud de Rochefort to the board, who then took part in several events in Brussels.

The role of all types of flexibility was also widely discussed at the EGSC conference supported by EDF, with the focus on

hydropower. The European Hydraulic Alliance, launched in 2023, took the time to structure its governance in 2024 so as to enable concrete actions to be relaunched in 2025.

The subject of security of supply and energy security was covered extensively in 2024 with participation in European Commission consultations, the contribution to an EPC study on economic security and support for the Eurelectric study on security of supply to be published in early 2025.

#### Outlook 2025

EDF will continue to advocate an optimised approach to the European energy system, taking the role of all types of flexibility, both upstream and downstream into consideration. The key role of generation sources such as hydroelectricity and nuclear power in ensuring the flexibility and resilience of the electricity system must be recognised, particularly in the texts of the Clean Industrial Deal.

of this approach for minimising power system costs. We also shared EDF's

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#### Challenges

European competitiveness has become a central issue with the Antwerp Declaration on European Industry, signed by over seventy leaders of major industrial groups in February 2024. This text marked the starting point of a debate on structuring the role of the European Union in supporting industry, while reconciling the imperatives of energy transition. Faced with international competitive pressure and growing decarbonisation requirements, the signatories called on Brussels to include the industry among the strategic priorities of the 2024-2029 legislature. This plea has been echoed by European institutions, making support for industry a key component of policy guidelines for the years ahead. The challenge is to ensure a regulatory and financial framework that enables European companies to remain competitive in the face of competitors benefiting from more interventionist public policies, while meeting the climate objectives set by the EU.

#### Activities

Against this backdrop, in-depth discussions were held between the major electrical sector associations and the main federations representing the energy-intensive industries. These efforts resulted in a joint declaration defining the conditions for effective support for energy-intensive industries, essential for their competitiveness and their transition to a low-carbon model. In addition, an initiative led by EDF has played a key role in the emergence of new, tailored financing tools. Initially proposed by EDF's CEO at the Bruegel think tank's annual conference. the idea of an "Flectrification Bank" has evolved into the Decarbonisation Bank. integrated into the Clean Industrial Deal of February 2025. This scheme is aimed at structuring financial support to accelerate industrial transition. At the same time, we had to ensure that the recent reform of the electricity market model could be rolled out, allowing electricity prices to be decoupled from gas prices thanks to tools such as longterm contracts.



## Strengthening European Competitiveness while preserving climate ambitions





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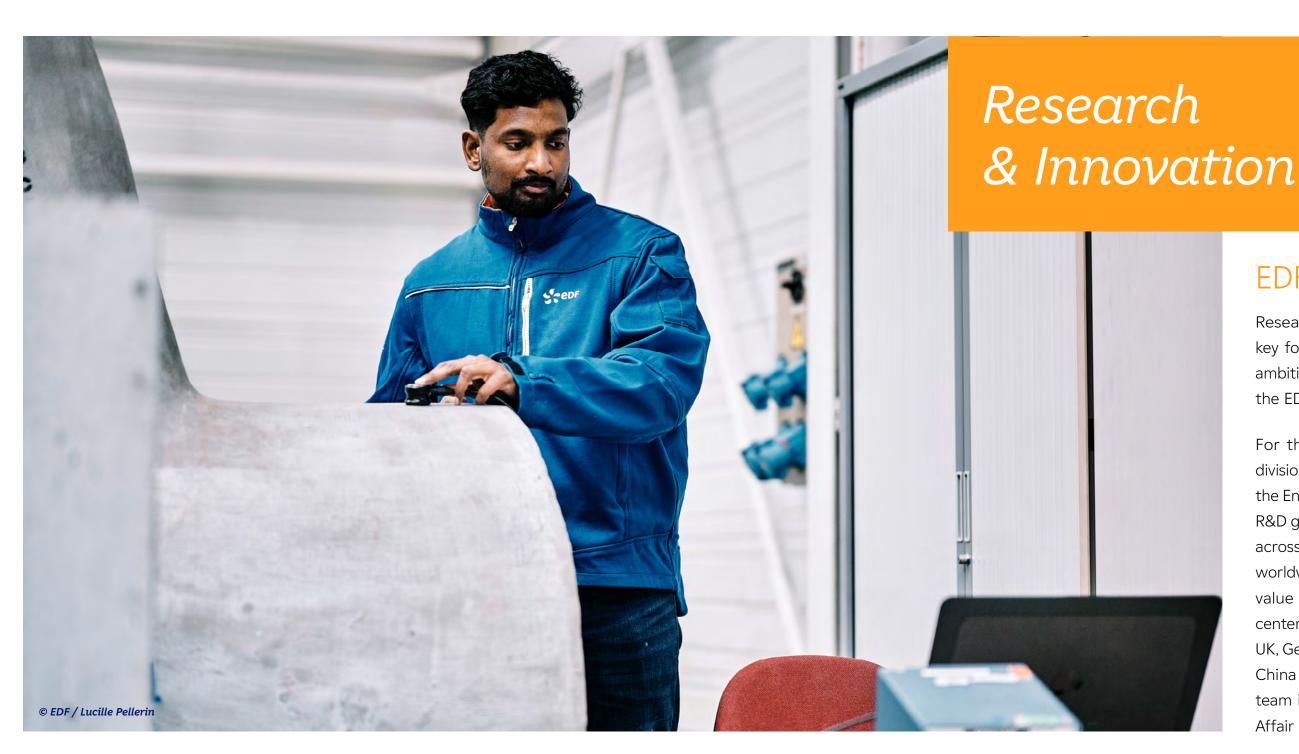
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#### EDF'S R&D

Research & Innovation activities are key for deployment of the EDF group ambitions toward energy transition and the EDF Net Zero 2050 scenario.

For this reason the EDF Group R&D division is one of the largest R&I units in the Energy sector in Europe. EDF Group R&D gathers around 2000 researchers across 14 labs in France, in Europe and worldwide. EDF Group R&D deliver local value through the International R&D centers, not only in France but also in UK, Germany, Italy, Bruxelles, Singapore, China and the US. The Bruxelles R&D team in fully integrated in the EDF EU Affair Division.

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R&I expertise and activities cover all the value chain of the electricity and the business of the EDF group, from low carbon generation (nuclear, renewable, hydropower) trough grid innovation and customer services.

EDF R&D works both to the improvement of the performances of the group in all the current activities and in preparing the future.

#### **EDF'S ENFIN**

The experts of the EDF Group Network for project Financing (ENFIN), part of the European Affairs Division, support EDF R&D department, EDF's business units and subsidiaries, as well as their partners, to boost innovative projects development and implementation in different fields such as renewable energy, storage, decarbonised mobility, energy efficiency, and decarbonisation of the energy-intensive industries.

Support to EDF Group innovative and decarbonisation projects

ENFIN supports EDF's R&I and decarbonisation efforts by identifying the most relevant European, national or regional funding programs (as well as European academic and industrial partners when necessary) to unlock the implementation of innovative and decarbonisation projects and support dissemination and knowledge sharing activities towards EU stakeholders. The ENFIN experts work on the preparation and submission of proposals to the IPCEI framework, European or national programs such as Horizon Europe, ERDF, Recovery and Resilience Plan, Connecting Europe Facility, Innovation Fund and LIFE, whose aim is to provide the financial support needed to design, develop, test and deploy solutions and key technologies in the achievement of EU's climate and energy targets.

Aligned with EDF's "raison d'être" and objectives focusing on building a net zero energy future with electricity and innovative solutions and services. ENFIN

has been contributing to the financing and implementation of numerous projects in various fields: nuclear energy, renewable energy, hydropower, decarbonisation of transport modes, energy storage, flexibility (e.g., vehicle to Grid), photovoltaic (PV), heat recovery, positive energy blocks, heating networks and hydrogen production and distribution facilities.

# Support to EDF Group R&I strategy within the EU framework

ENFIN is also responsible for analysing trends in European R&I field and contributing to the influence of EDF R&I at European level. ENFIN supports the development and implementation of European R&I collaborative projects to promote synergies with its European

counterparts (research laboratories, R&D centers, ...) and contribute to the dissemination of the EDF Group's innovative solutions at European level.

R&I is a key vector for bringing EDF expertise toward the EU institution, helping to understand the challenges of the energy and digital transition and to scope the R&I RoadMap of the Commission.

EDF contributes to the activities of the European Technology and Innovation Platforms (ETIP) and Public Private Partnerships (PPP) at European level, collaborating with academic and industrial organisations to define the R&I priorities and objectives to be met to achieve EU's energy and climate goals.

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### Stakeholders

In 2024, the work of the professional associations and think tanks in which EDF is involved was guided by the renewal of European institutions as well as increasing industrial, security and climate issues.

The main European associations in which the EDF Group was active in 2024 were EASE, EFET, EFIEES, EHPA, Eurelectric, Eurogas, EuroHeat&Power, France Industrie, Hydrogen Europe, SGI Europe, SmartEN, SNETP, Nucleareurope and WindEurope. In 2024, EDF was also a member of a number of think-tanks, including ERCST, Bruegel, EPC, CLG Europe, FSR and Notre Europe Jacques Delors.



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In 2024, the EDF Group was represented on the boards of various associations, including EASE (Vice Presidency, Committee Chairman), WindEurope, SmartEN, NuclearEurope, Effies (Presidency), SGI Europe and SNETP and Solar Power Europe. At the end of a process that began in 2024, EDF took over the presidency of NuclearEurope in January 2025. Through UFE, EDF participates in Eurelectric's governing bodies, the Coordination Committee and the Executive Board.

Major actions in the network of associations and think-tanks relating to the EDF Group's priorities for the 2024-2029 mandate

The subject of electrification advocated by EDF has been widely taken up in the Brussels

sphere, whether within associations such as Eurelectric, WindEurope, SolarPowerEurope, SmartEN, or think tanks like Bruegel. It is now on the European Commission's agenda for its new term of office. The subject of technological neutrality remains more complex, although significant progress has been made. The think tank EPC has supported the defence of nuclear power as an energy source through a major report on security of supply.

In February 2024, the study conducted by the Florence School of Regulation on long-term contractual conditions for the sale of electricity was completed after being commissioned by EDF. The study was concluded by a seminar attended by DG COMP and DG ENER.

Finally, EDF supported a number of conferences organised by major associations, such as Eurelectric's E-vision, the annual conference of the EASE association and that of the EHPA association, while regularly participating in and speaking at numerous think tank seminars (Bruegel, ERCST, FSR, EPC, CLG Europe).

Confirmation of the role of EDF Europe Network in its federation to involve the Group in ethical and coordinated lobbying

Within EDF, the Europe network, which brings together all the Group's participants in professional associations, continued its activities, in particular through:

- A series of online information meetings,
- A physical meeting in November 2024, attended by the Chairman of EDF and three General Secretaries or equivalent of major European associations, such as Eurelectric, WindEurope and SmartEN.

The purpose of this network is to identify all the people in the Group who have dealings with European institutions, to make them aware of the lobbying rules set out in the Code of Ethics and Compliance, to inform them of the Group's major European policies, and to circulate public responses to the various public consultations. It is also the basis on which the European Affairs Department is able to synthesise the Group's needs and take them to the Brussels stage.

Finally, the annual review of the Europe network was launched at the end of 2024, with two objectives:

The first is to collect information on the activities of the various associations in which EDF is involved and encourage Group members to take up positions of responsibility in these associations.

The second objective is to contribute to EDF's extra-financial rating. This review makes it possible to verify that the company's expenditure is committed to associations that fight climate change and support the just transition principles promoted by the Group. If this is not the case, EDF reminds the association of these objectives and helps to change its position.

This review is also an opportunity to take

stock of the Group's involvement in various associations and encourage participation in new ones. In 2024, EDF joined the Solar Power Europe association.

2025 : The European Union at an industrial and security crossroads, not to mention the climate

The group will support and actively participate in the initiatives of various associations and think tanks linked to the re-industrialisation and security of Europe by supporting certain conferences and taking part in numerous meetings and seminars. Particular attention will also be paid to climate issues to ensure that they are not relegated to the background.

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