



Vigilance plan 2024

Content

1	Vigilance plan framework	4
1.1	Presentation of the Group	5
1.2	Governance, oversight and stakeholder involvement	9
1.3	Vigilance plan methodology	12
2	Salient risks and risk prevention and mitigation measures	18
2.1	Global actions to prevent and mitigate risks related to the duty of vigilance	19
2.2	Human rights and fundamental freedoms	20
2.3	Environment	32
2.4	Health and Safety	50
2.5	Suppliers and subcontractors	58
3	Alerting and monitoring	69
3.1	The EDF group's whistleblowing system	70
3.2	Monitoring system	72
4	Appendices	73

Introduction

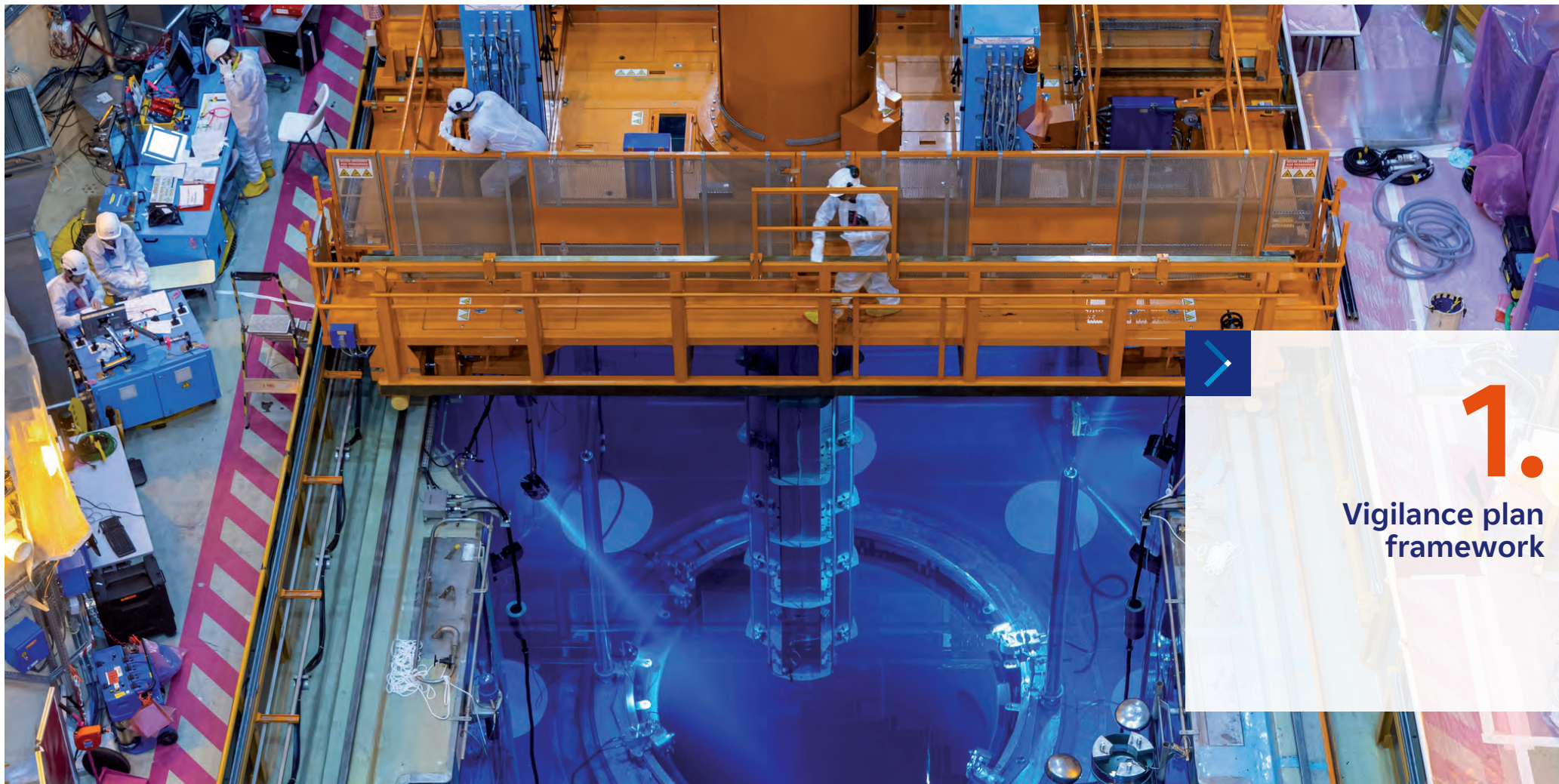
French law on the duty of vigilance of parent companies and ordering companies introduced the obligation to draw up and implement a vigilance plan¹.

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 a description of five measures:



¹ Law no. 2017-399 of 27 March 2017 in Article L. 225-102-4 and L.225-102-5 of the French Commercial Code

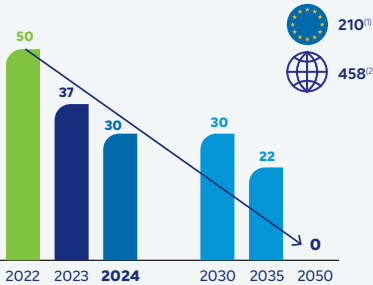


1.1.2 Key figures 2024

Carbon intensity trajectory

(In gCO₂/kWh)

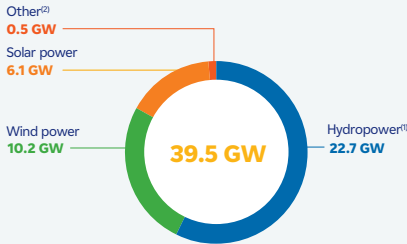
Around 7 times lower than the European average and more than 15 times lower than the global average



(1) 2023 value, EU-27, European Environment Agency.

(2) 2023 value, International Energy Agency, World Energy Outlook 2024.

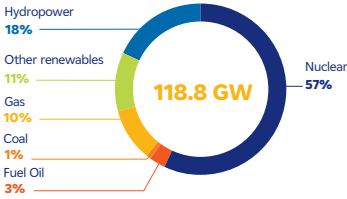
Net installed renewable capacities by sector at end-2024



(1) Including marine energy; 0.24 GW.

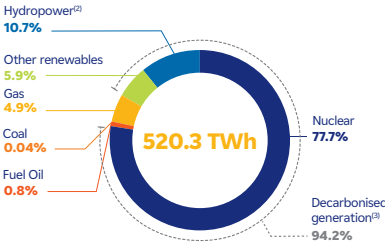
(2) Biomass, geothermal energy.

Installed capacities⁽¹⁾



(1) Consolidated data.

Electricity generation⁽¹⁾

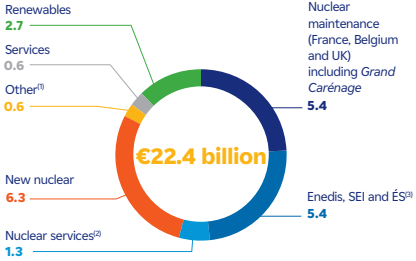


(1) By fully consolidated entities.

(2) Including pumped-storage consumption and marine energy.

(3) Direct carbon emissions related to generation, excluding the life cycle analysis of generation facilities and fuel.

Net investments excluding disposal plan



(1) Including central functions, real estate, gas and fuel oil.

(2) Framatome and, since June 2024, Arabelle Solutions

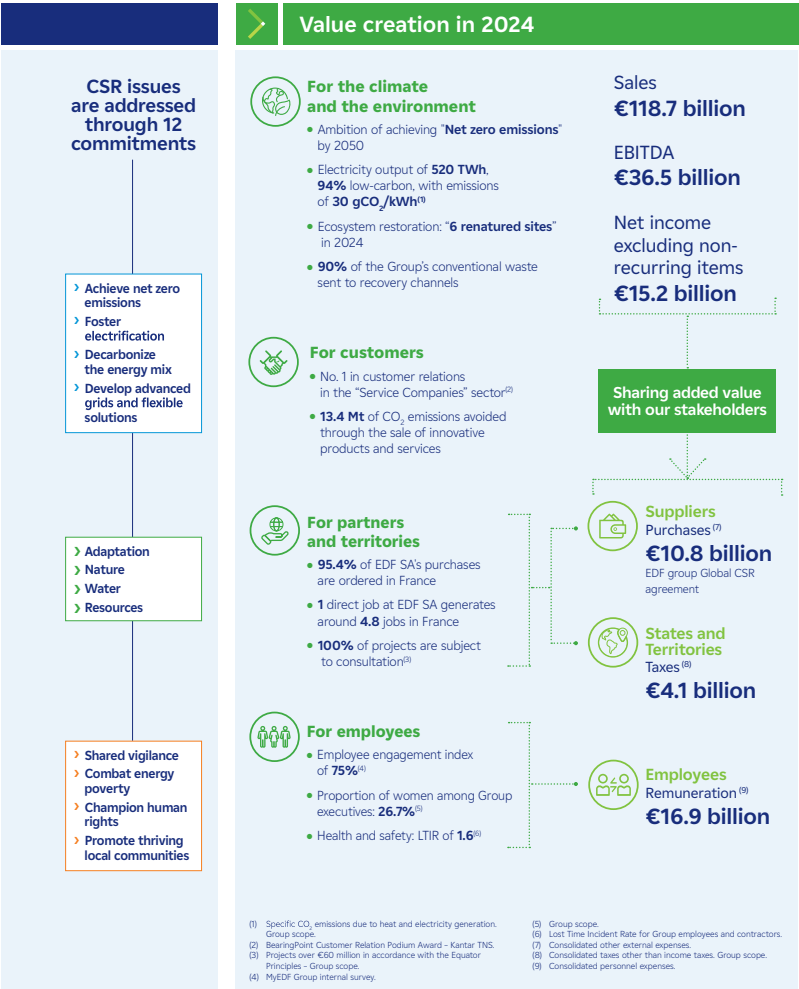
(3) SEI: Systèmes Énergétiques Insulaires (Island Energy Systems), ES: Électricité de Strasbourg.

1.1.3 Strategic priorities

EDF's *raison d'être* is "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". It was incorporated into the Company's articles of association at the end of the General Meeting of 7 May 2020 and underpins the Group's strategy.

Today, EDF is the world's leading producer of low-carbon electricity². For every kWh produced, EDF emits about seven times less CO₂ than the average for European utilities (210gCO₂/kWh)³ CO₂/kWh) and has set itself even more ambitious emission-cutting targets: by 2030, EDF will have reduced its direct emissions by 70% compared to 2017, and that reduction in direct emissions will reach 80% by 2035. The carbon intensity of the electricity produced by the Group will be 30gCO₂/kWh by 2030 and will drop to 22gCO₂/kWh by 2035. And EDF is committed to reducing its indirect emissions by 35% by 2030 compared to 2019, and 45% by 2035.

2 Source : Enerdata, *World ranking of zero direct CO₂ emissions power producers* (2023, TWh), <https://power-producers-ranking.enerdata.net/>
3 <https://www.eea.europa.eu/en/analysis/indicators/greenhouse-gas-emission-intensity-of-1/greenhouse-gas-emission-intensity-of-electricity-generation-eu-level>



1.1.4 The Group’s reference standards for its commitments and requirements with respect to the environment, human rights, and health and safety

EDF’s vigilance plan follows the UN Guiding Principles on business and human rights (UNGPR), OECD Guidelines, the fundamental conventions of the International Labour Organization (ILO) and the UN Universal Declaration of Human Rights.

In this context, the Group published on its website its duty of vigilance framework entitled “Human rights and fundamental freedoms, health and safety, environment, business ethics: the EDF group’s commitments and requirements. This framework brings together the commitments and requirements of the EDF group (EDF and the companies it controls) and the fundamental requirements of its business relationships in terms of respect for human rights and fundamental freedoms, protection of the environment, guaranteeing the health and safety of people, and business ethics.

These standards relate to and refer to all the Group’s public documents and internal policies.



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

Mandatory Group procedures binding on all controlled entities

- Risk management and internal control
- Governance of subsidiaries and holdings
- Project management, ethics and compliance
- CSR
- Health and safety
- Purchases

Internal documents made public

- Ethics charter
- Ethics and compliance code of conduct
- Sustainable development charter for EDF and its suppliers
- Global framework agreement on the Group’s social responsibility

External sources

- UN Global Compact
- UN Guiding Principles on Business and Human Rights
- OECD Guidelines for Multinational Enterprises
- WBCSD CEO Guide to Human Rights
- Conventions of the International Labour Organization (ILO) guaranteeing fundamental principles and rights at work and combating for the elimination of discrimination
- Declaration on the Rights of the Child
- Declaration on the Elimination of All Forms of Discrimination against Women
- Global Reporting Initiative (GRI)
- Supplier Relations and Responsible Purchasing Label (RF&AR)

1.2 Governance, oversight and stakeholder involvement

1.2.1 Governance of the vigilance plan

EDF strengthened its oversight of the vigilance plan in December 2020 with the appointment by two members of the Executive Committee of a Group Duty of Vigilance Compliance Manager⁴. This Manager is responsible for drawing up, rolling out and coordinating the vigilance plan and its implementation throughout the Group, in partnership with the Impact Division.

The vigilance plan is designed and overseen in collaboration with the Legal Affairs Division 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.

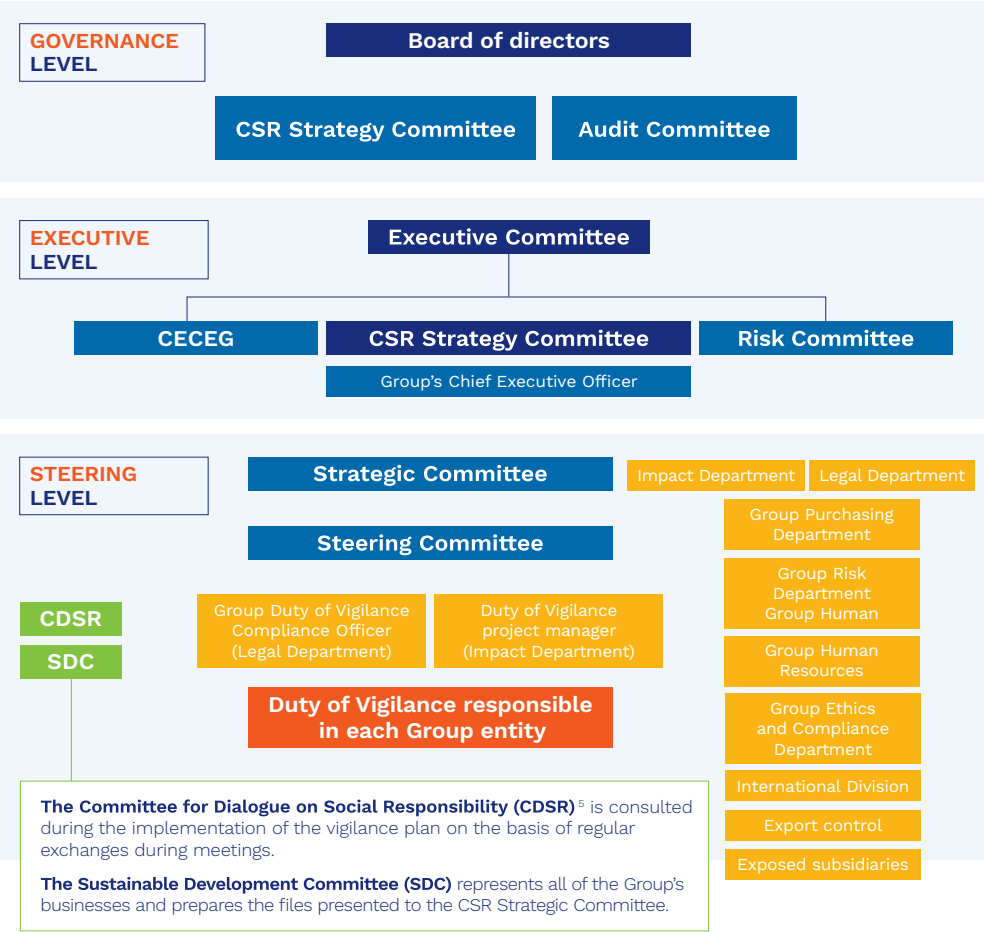
Executive level

The Group Executive Committee's 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, validates the actions and orientations of the Group's vigilance plan.

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

Governance of the vigilance plan



4 The Group General Secretary and the Group Executive Director in charge of innovation, corporate responsibility and strategy.
5 Since January 27, 2025, the CMDRSE (Global Committee for Dialogue on Social and Environmental Responsibility) has been the monitoring committee for the implementation and compliance with the commitments of the above-mentioned agreement.

Oversight Level

The vigilance plan is designed and overseen in collaboration with the Legal Affairs Division and the Impact Department within a **Steering Committee and a Strategic Committee** that also includes the Human Resources Division, the Purchasing Division, the Risk Division, the International Division, the Ethics and Compliance Division, the Export Control and International Sanctions Division, and representatives of subsidiaries with exposed activities.

The CSR Strategy 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 following operational advances reported by the Steering Committee, which meets quarterly.

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

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

The Sustainable Development Committee (SDC) represents all the Group's businesses and prepares the dossiers presented to the CSR Strategic Committee.



1.2.2 Stakeholder involvement

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

Committee for Dialogue on Social Responsibility (CDRS)

The Global Framework Agreement (GFA) on the Group's social and environmental responsibility⁶ signed by EDF, the 18 trade union organisations representing the Group's employees and two international trade union federations (IndustriAll Global Union and PSI) stipulates that its vigilance plan is "developed and set up in association with the company's stakeholders, including workers' representative organisations". Since 2018, the Committee for Dialogue on Social Responsibility (CDRS)⁷, composed of representatives of all the signatories to the agreement, has been working on numerous topics related to the duty of vigilance (health and safety, exercise of the Group's responsibility in connection with international projects, etc.) and on the actions to be implemented to roll out and improve the Group's vigilance plan. Thus, in 2024, **the meetings of the CDRS enabled its members to learn about the publication of the 2023**

vigilance plan and to discuss the 2024 vigilance actions, including the living wage, as well as the 2023 assessment and 2024 outlook on the Group's health and safety policy. Interventions by external experts in the nonprofit sector were also organised to illustrate their view of major current issues in terms of human rights. Comments and suggestions of the Group's Stakeholder Council, relating to the vigilance plan, were also shared and discussed.

In terms of the legislative framework, members were also briefed on **developments in the draft European directive on the duty of vigilance and corporate sustainability responsibility (CS3D)**, as well as the Group's implementation of the CSRD directive on sustainability reporting. These CDRS meetings are an opportunity to debate issues in order to answer members' questions about subjects related to the Group's duty of vigilance, or to local issues known to them.

Discussions with stakeholders

EDF participated in meetings with other companies, lawyers, NGOs, and trade union federations through the non-profit organisation "Entreprises pour les droits de l'homme" (Businesses for Human Rights) (EDH), **for open discussions on stakeholders' expectations** and other companies' practices, and to improve its vigilance plan preparation processes.

Since 2022, personalities specialised in human rights and links with finance at the United Nations or green jobs at the International Labour Organization (ILO) have been members of the Group's Stakeholders Council in order to better integrate this expertise within this body.

A privileged body for dialogue with external stakeholders, **the Group's Stakeholder Council is a multidisciplinary, gender-balanced, voluntary collective made up of thirteen personalities from civil society** who are specialists in the environment, climate, academics, representatives of student groups, economists and actors in the social and solidarity economy. It has been co-chaired by EDF's Chairman and Chief Executive Officer and Cécile Renouard⁸ since 2022.

Meanwhile, the Group continuously pursues open discussions with various civil society actors (associations, public figures) who wish to keep up this dialogue, for new ideas to advance its vigilance plan.

⁶ Agreement signed on 27 January 2025

⁷ Since January 27, 2025, the CMDRSE (Global Committee for Dialogue on Social and Environmental Responsibility) has been the monitoring committee for the implementation and compliance with the commitments of the above-mentioned agreement.

⁸ Philosopher, professor at the École des Mines, ESSEC and IEP Paris, and president of the Campus de la Transition.

1.3 Vigilance plan methodology

1.3.1 Main characteristics of EDF as regards the duty of vigilance law

From the construction and operation of nuclear, hydropower, photovoltaic, wind and thermal power plants, to the development and operation of electricity grids, to marketing and helping customers to save energy, the Group is present at every step of the value chain in France and is expanding internationally.

Main countries of activity

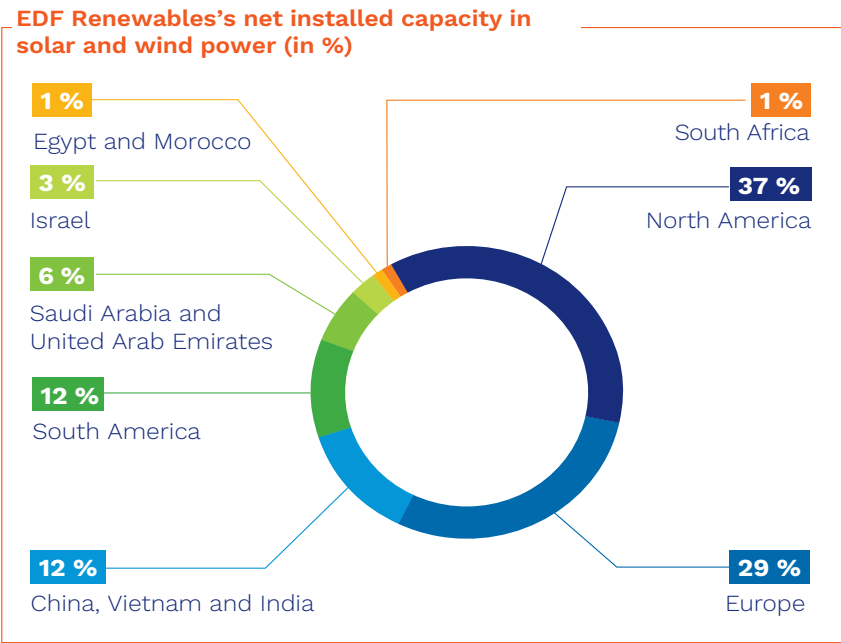
The Group’s core development scope in Europe is its “G4”, comprising France, Italy, Belgium and the United Kingdom. The EDF group is present in these countries as a key player in electricity generation, with a significant customer portfolio in each region. Building on its strong local integration, the EDF group is developing a range of supply offerings, solutions and services aligned with local energy policy choices, to help customers reduce their carbon footprint.

In the rest of the world, outside the “G4”, the Group is mainly developing through business models in which it does not have exclusive control of an asset, but an industrial role that capitalises on the Group’s experience. EDF will look for growth drivers, by engaging in value-creating projects in growing markets, and by exporting its recognised expertise to countries looking for concrete solutions to succeed in the energy transition. For countries considered to be “higher-risk” particular vigilance is exercised, including over relations with partners.

The Group is developing projects in various geographical areas including Brazil, the Andean Arc (Chile-Peru-Colombia), the Middle East (Saudi Arabia and the United Arab Emirates), West and Central Africa (Cameroon, Côte d'Ivoire, Togo), Southern Africa (Mozambique, Malawi), Laos, India, the United States, Australia, Germany, Spain and Uzbekistan.

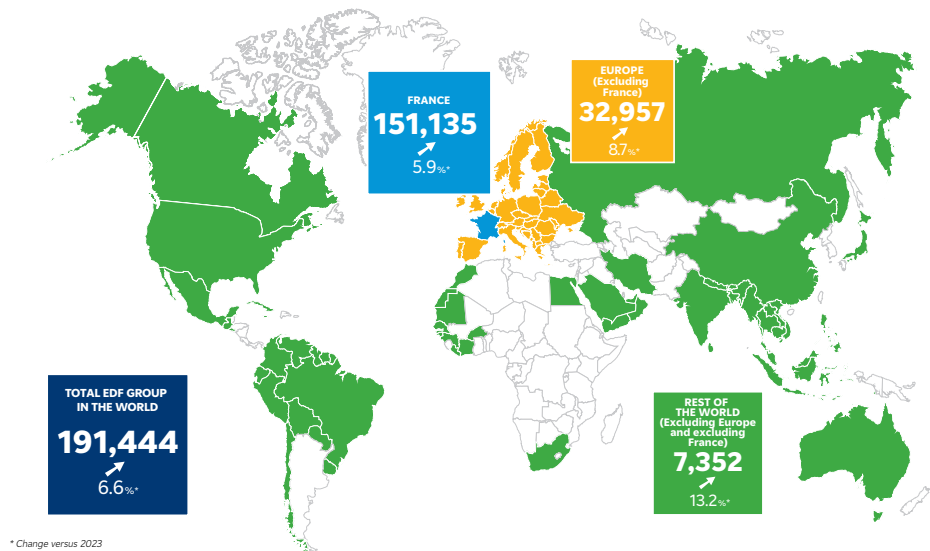
Group-wide, **EDF Renewables** develops projects alone or in partnership, and operates and maintains facilities producing electricity from renewable energies in nearly 25 countries. EDF Renewables operates across the entire value chain. It is active upstream in project development, in engineering during the construction of wind and solar farms, and finally in the operation and maintenance of the facilities built. As of 31 December 2024, EDF Renewables holds 60.3% wind power projects, 37.0% solar power projects and 2.7% storage projects⁹, and has begun a technological rebalancing initiative by accelerating its development in solar power.

Historically, its main operations are located in North America (United States, Canada and Mexico) and Europe, starting with France and the United Kingdom. EDF Renewables also started to rebalance the geographical distribution of its activities. It is strengthening its presence in other countries with high potential for growth in renewable energies such as South Africa, Brazil, China, India, the United Arab Emirates, Saudi Arabia, Morocco and Oman.



The International Group's workforce

96% of the Group's global workforce is European and 79% is based in France.



Suppliers and subcontractors

The scope of EDF's suppliers and subcontractors represents approximately 18,000 tier-one suppliers. More than 95% of purchases are made in France and 97.4% are made in the European Union (99.3% when the European Free Trade Association (EFTA) countries are added)¹⁰. Certain subsidiaries' suppliers and suppliers involved in international projects are subject to special vigilance measures. Because the Group's activities are mostly industrial by nature, before making investment decisions EDF exercises upstream vigilance with regard to risks of serious infringements of human rights or harm to human health (concerning employees, contractors, local residents, local communities and customers) and risks to the environment that could arise, particularly during construction, operation, maintenance or decommissioning of facilities.



Scope of the vigilance plan

The scope of the vigilance plan covers EDF's activities, the activities of its controlled subsidiaries¹¹, and the activities of its suppliers and subcontractors with which it has an established business relationship, insofar as their activities are connected to that relationship.

Dalkia and Framatome, two subsidiaries with over 5,000 employees each, are included in the plan, together with all French and foreign subsidiaries.

RTE and Enedis, respectively operators of the French electricity transmission and distribution systems, are independently managed regulated subsidiaries and therefore publish their own vigilance plans.

See the Organisation of the Group p.74

10 The European Union, Switzerland and the United Kingdom in particular.
11 Subsidiaries integrated into the scope of consolidation by full consolidation within the meaning of Article L. 233-16 II of the French Commercial Code (in France and abroad).

1.3.2 Group risk mapping methodology

The process for identifying and ranking the risks used to develop the vigilance plan involves two complementary approaches: **Group risk mapping**, which covers the risks related to the duty of vigilance, and **additional risk mapping, which specifically focuses on the entities most exposed to risks** because of their activity and/or their location.



The EDF group risk mapping methodology guide describes the risks specifically related to the duty of vigilance. The Group asks entities to map risks affecting human rights and fundamental freedoms, health and safety at work, and the environment, which could be caused by its activities or the activities of its suppliers, service providers or partners.

Pursuant to the Group’s approach, each Group entity carries out its own risk mapping, under the responsibility of management, using a typology that aims to cover all risk categories that affect the Group, internal and external, operational and strategic.

In 2023 and 2024, all the Group’s entities risk managers were made aware of the importance of risk mapping for the duty of vigilance. Risk mapping information was shared between the Group Risk Division and the Impact Division for a better approach to these risks.

Risk identification

To be reasonably certain that the principal risks are being identified, **a separate approach for each business process and each asset is combined with an approach for each major risk type**. Feedback, events, incidents, and near-misses are also taken into consideration as a source of risk identification, together with the results of audits. The final identification of risks is the outcome of a discussion between the main actors: managers, experts and stakeholders.

Risk assessment and ranking

The identified risks are qualitatively ranked based on:

- **their impact**, i.e. their potential severity: this is assessed by reference to multiple criteria, including evaluation of their impact on the physical or human environment;
- **their probability of occurrence**, i.e. their degree of likelihood: this is evaluated over an appropriate time horizon estimated on the basis of the history of the activity, past experience, or internal or external expertise;
- **their level of control**, i.e. the effectiveness 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 mapping is based on the entities’ risk maps, internal control self-assessments, and cross-analyses of experiences reported by operational and functional entities.

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

Moreover, the implementation of the CSRD allowed to specify the consistency between the impact, risks and opportunities (IRO) identified in the context of the CSRD, and the main risks identified in the risk mapping. Overall, all the risk analyses carried out in the various contexts have been set up with a view to over-arching consistency: Group risk mapping, CSRD and the vigilance plan.

1.3.3 How Group risk assessment shaped the vigilance plan in 2024

This approach enables to identify the principal risks at the level of the EDF group. The resulting risks are ranked according to a three-level criticality scale (high, intermediate or moderate) assessed on the basis of their potential severity, their probability of occurrence, and their impact, taking into account existing measures.

- 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.32
 - Salient risks relating to human health and safety: see p.50
 - Salient risks relating to suppliers and subcontractors: see p.58

Risk	Description
Ethics or compliance risk	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.
Adaptation to climate change - physical risks and transition risks	This risk includes a section on the impacts of the Group’s activities on the climate.
Industrial safety risks and impact on environmental assets including biodiversity	This risk is specific to nuclear safety and hydropower safety.
Managing complex large industrial projects, including EPR projects	This risk includes a component regarding projects’ potential impacts on human rights, the environment, health and safety.
Operational continuity risks for supply chains and contractual relations	This risk specifically includes vigilance-based measures during the contracting and contract monitoring stages.
The occupational health and safety risks for employees and subcontractors	This risk is related to the industrial nature and diversity of the Group’s activities, which reinforce the fundamental importance of complying with rules and taking into account the various risks that may affect people working at the Group’s industrial facilities, in order to preserve health and safety in the workplace.

See Appendices p.75

1.3.4 Main improvements to the EDF group's vigilance plan in 2024

In 2024, several projects and actions were initiated or prolonged as part of a continuous improvement approach to the Group vigilance plan.

Adaptation and rollout of human rights commitments included in the Group's duty of vigilance standards

In March 2021, EDF drew up a document listing the commitments of the Group (EDF and its controlled subsidiaries) and the fundamental requirements for its business relations in terms of human rights and fundamental freedoms, environmental protection, protection of human health and safety, and business ethics. The Group summarises its duty of vigilance commitments in that document, and spells out its requirements for partners, financiers, suppliers, and subcontractors. This document, submitted to the members of the CDRS (see p.11), was signed by the Chairman of the EDF group.

In 2023, EDF finalised **the application of each of the human rights commitments in its duty of vigilance standards in order to clarify, contextualise and roll 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 control actions and, where applicable, available tools. These guides are available in French, English, Italian, Spanish and Simplified Chinese. In 2024, EDF supplemented these tools by developing a file to identify potential risks of human rights violations by major type of raw material based on the technologies and the main producing or extracting countries.

The Group also published [a page on its website explaining its commitments and actions to promote human rights](#).

Reinforced integration of the duty of vigilance in the procurement process

The Group Executive Committee Commitments Committee (CECEG) closely examines the most significant projects in terms of the scale of the commitments before the Executive Committee decides. In this context, the EDF group's Commitments policy sets the framework for decisions on commitments and in particular states that the project must carry out an assessment of the risks of non-compliance with commitments and fundamental requirements in terms of respect for

human rights and fundamental freedoms, of protection of the environment, of guaranteeing the health and safety of people, and of business ethics, in accordance with the law on the duty of vigilance. In addition, these projects are subject to an opinion by the Impact Department. This opinion is based on an analysis grid that translates the Group's CSR commitments into operational terms. Issues relating to the environment, personal health and safety, and human rights are therefore systematically addressed in the analysis of projects. Where necessary, the Impact Department requests due diligence specific to these issues. For certain projects, when the corresponding risks and complexity so require it, the Group has recommended, since 2024, the development of a dedicated vigilance plan. These project-specific vigilance plans are worked on by the entities supporting these projects, then submitted to the Group's duty of vigilance managers.

Group-wide awareness campaigns and rollout of the vigilance plan

Duty of vigilance managers are appointed in each Group entity, selected based on their duties in matters relating to CSR, ethics and compliance, or internal control.

Four meetings of the duty of vigilance managers' network took place in 2024, focusing mainly on the following:

- presentation of the Group's second autonomous vigilance plan for 2023 and the main actions for 2024;
- sharing information about the introduction of vigilance measures at certain Group subsidiaries;
- an intervention by the Sports Ethics Agency on the identification of criminal risks in the sports sector as part of relations with partners in anticipation of the Olympic Games;
- sharing the comments and suggestions of certain Group stakeholders on the vigilance plan;
- regulatory watch: developments regarding the draft of the Corporate sustainability due diligence directive and ongoing French disputes relating to the duty of vigilance.

Regarding trainings, the Group developed in 2021 **a specific e-learning module on the duty of vigilance**, to raise awareness and help roll out the Group's vigilance plan.

In 2024, this e-learning module, as well as the one on human rights, were made available to the members of the EDF Board of Directors, as part of the new “CSR” training offering on the new elearning platform. By the end of December 2024, around 3,000 employees had completed this e-learning module (2,500 at the end of 2023). In addition, a half-day of training, dedicated to the duty of vigilance, was also provided to the legal officers supporting EDF's group Executive Committee Commitments Committee (CECEG).

These actions in 2024 are part of a year-round improvement process based on a regularly reviewed action plan.

3,000

employees completed the
e-learning module on duty of
vigilance by the end of 2024
(compared with 2,500 by the end of 2023)





2.

Salient risks and risk prevention and mitigation measures¹²

¹² The elements of the annual report are integrated into the related prevention and mitigation measures.

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

Risk prevention and mitigation measures are implemented by each relevant entity, through the application of cross-cutting and sector-specific policies using the common Group risk control methodology as a basis. This methodology involves establishing descriptions of action plans for dealing with risks and an evaluation of their effectiveness.

Industrial projects are subject to **a risk analysis covering the scope of application of the duty of vigilance**, taking into account their nature, size, technical features and location. For the purpose of this analysis, **environmental and social impact studies** for projects located in non-OECD countries are based on the most demanding international standards, mainly those issued by the International Finance Corporation (IFC), World Bank, and Asia Development Bank.

In addition, to ensure that EDF's commitments regarding the environment, human health and safety, and human rights are not overlooked, the related issues are systematically addressed through the identified project risks when **projects are submitted to the Group Executive Committee's Commitments Committee (CECEG) for assessment**.

In practice, this involves identifying the risks associated with projects both for the activities being developed and for the supplier and subcontractor relations envisaged for the purpose of the project. This risk identification is facilitated by **the provision of a regularly updated screening grid** used for analysis of projects in coherence with the Group's raison d'être, CSR commitments, and guidelines, as well as with international standards.

This grid covers environmental, health and safety, human rights and ethics issues. In the milestones prior to the CECEG, these aspects are examined in the project validation bodies specific to each entity.

Furthermore, the EDF group regularly engages in share subscription or acquisition operations concerning French or foreign entities, for purposes of partnerships, major projects, external growth or investment. In 2023, EDF finalised a methodology guide providing a list and practical presentation of the ethics and compliance due diligence work required. These requirements are based on the ethics and compliance policy, which covers the Group's compliance programmes, including the duty of vigilance. This guide sets out a series of due diligence checks to be performed and actions to implement in a chronological sequence for every phase of a proposed acquisition/partnership/project, based on the level of risk identified at each stage.



2.2 Human rights and fundamental freedoms

2.2.1 Identifying salient risks

In matters of human rights and fundamental freedoms, the Group's ethics and compliance policy, which includes the duty of vigilance, has led the EDF group to identify salient risks and associated mitigation measures with regards to the Group's activities and the countries where

the company and its subsidiaries operates. The Group has used the Verisk Maplecroft®, human rights indices since 2021 for a more granular analysis of the human rights risks the Group could face in the countries where it operates, makes purchases and is developing.

2.2.2 Monitoring indicators

40%

of executives within the Group to be women by the end of 2030

95/100

Gender Equality Index

100%

Annual rate of projects for which a dialogue and consultation process is undertaken



Salient risks relating to human rights and fundamental freedoms

Risk category	Salient risk	Geographic area	Risk criticality	Material negative impact	Group risk ¹³
Cross-cutting	Risks related to harassment and discrimination	Global	■	ESRS S1 Own workforce ESRS S2 Workers in the value chain	3D
International activities and projects	Risks of infringement of the rights of local communities:				
	Risks related to land issues given the need for fair compensation and the implementation of sustainable livelihood restoration programmes.	All areas excluding Europe, North America and Australia	■ ■	ESRS S3 Affected communities	1A
	Risks related to population displacements or the consequences of inadequate consultation with local communities, particularly indigenous communities.	Latin America, South-East Asia, India	■ ■	ESRS S3 Affected communities	1A
	Risks related to the use of security forces.	Areas near conflict zones or authoritarian regimes	■ ■	ESRS S3 Affected communities	1A
	Workers on construction sites and in operational activities:				
	Risks of infringement of workers' rights, notably risks related to decent working and housing conditions.	All areas excluding Europe, North America and Australia	■ ■	ESRS S1 Own workforce	1E, 1A, 1B
		Gulf countries	■ ■		
		Europe, North America and Australia	■	ESRS S2 Workers in the value chain	1E, 1A, 1B
		Gulf countries, South-East Asia	■	ESRS S2 Workers in the value chain	

Net criticality of control actions: ■ ■ ■ high ■ ■ intermediate ■ moderate

13 See appendix "Risks to which the Group is exposed" p.75

2.2.3 Principal prevention, mitigation and monitoring measures implemented

The implementation of human rights commitments is part of the deployment of the Global Framework Agreement (GFA) on the Group's social responsibility and the EDF group's standards on CSR commitments and requirements (see p.11).

In 2021, the EDF group published a set of guidelines listing the commitments of the Group 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. These EDF group human rights commitments were approved and signed by the Chairman and Chief Executive Officer.

Human rights commitments

Compliance with international standards

The EDF group does not tolerate any infringement of human rights and fundamental freedoms, either in its activities or in those of its business relationships when their activities are related to this relationship.

 **Our various human rights commitments online**

International Standards

In accordance with the United Nations Guiding Principles on business and human rights (UNGPs), the EDF group undertakes to respect, at the very least, international standards for the protection and defense of human rights and fundamental freedoms, and in particular the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, and the fundamental conventions of the International Labour Organization (ILO). Since January 2025, the Group has been a member of the TISFD (Taskforce on Inequality and Social-related Financial Disclosures) alliance, whose objective is to foster the emergence of economic practices that promote fairer societies. This alliance brings together around a hundred organisations from various sectors.

Conflicting standards

If the laws of a country where it operates conflict with these international standards, the EDF group endeavours to find a solution to render it compliant with both the spirit of the international standards and national laws.

Vigilance approach

To ensure that human rights and fundamental freedoms are respected in its operations, the EDF group has implemented a vigilance approach to identify, assess and prevent any potential infringement of human rights or fundamental freedoms. This vigilance approach has been designed to comply with the French Duty of Vigilance Law and is based on the recommendations of the UN Guiding Principles on business and human rights.

Vulnerable persons

The EDF group is committed to the careful monitoring of the impacts of its operations on individuals recognised as vulnerable under international human rights law and investigates, in complete transparency, impartiality and good faith, any alleged infringements of human rights or fundamental freedoms connected to the operations of the Group's entities, providers and subcontractors.

Proven cases of injury

If an infringement of human rights or fundamental freedoms is proven in the operations of the Group's entities, the EDF group has agreed to engage in dialogue with the victims and/or their representatives to address the situation, pursuant to the OECD Principles for Multinational Enterprises with which the EDF group complies.

The rights of employees

The EDF group is committed to human rights and fundamental freedoms and complies, as a minimum, with the provisions of the standards published by the International Labour Organization (ILO).

Combating discrimination

In terms of the prevention of discrimination, the EDF group guarantees equal treatment for its employees and is against any form of distinction, exclusion or preference, whether based on presumed race, skin colour, gender, age, religion, political beliefs, national origin, social origin, disability, family status, sexual orientation or gender identity. In the countries where it operates and for its own operations, the EDF group actively promotes equality in the workplace and equal treatment for equal work for the women and men working for the Group and strives to achieve balanced work teams at all levels of the Company. Diversity is encouraged at all staffing levels and employees must be protected from all forms of discrimination or retaliation.



Combating harassment, sexism and violence

The EDF group does not tolerate any form of harassment or violence, whether within or outside the workplace, relating to the working relationships established in the workplace. The Group is committed to preventing and protecting its employees from all forms of harassment, sexism and violence in the workplace.

Refusal of all forced labour

The EDF group is against all types of forced labour, as defined in the ILO fundamental conventions as well as any form of human trafficking. In particular, for the projects and operations implemented by the Group, it ensures that all employees have given their free, informed consent for the performance of all their duties. In particular, the EDF group ensures that its intermediaries and recruitment agencies do not use any practices that could result in forced labour. The Group is committed to protecting the free movement of workers and, in particular, will not confiscate the travel documents, identity papers or any other personal belongings of workers in any circumstances whatsoever.

No child labour

The EDF group is against all types of child labour, as defined in the ILO fundamental conventions. The Group commits to not employ anyone under the age of 15 (subject to the exceptions set out in ILO Convention 138) or anyone under the age of 18 for work considered dangerous as provided for in the ILO convention.

Freedom of association, right to collective bargaining and trade union rights

The EDF group upholds an individual's right to freedom of association and the right to collective bargaining as defined by the ILO. The Group recognises that all employees are free to form and/or join the workers' organisation of their choice and will not interfere with that right.

In accordance with the Group's Global Framework Agreement on Corporate Social Responsibility, the EDF group is committed to respecting and protecting the autonomy and independence of trade unions, in compliance with applicable laws and regulations. It aims to guarantee the effective exercise of trade union rights and recognises the

representative trade union organisations in the Company as contact people and partners. The EDF group respects strict neutrality as to whether or not its employees choose to belong to a trade union, and if so, which trade union they wish to be represented by. Employees are not discriminated against because of their union membership and/or activities. Notably, the EDF group sets aside a number of hours dedicated to the performance of trade union functions and mandates, as well as a supervised career path for employees holding representative and/or trade union positions. The EDF group prohibits any harassment, intimidation, sanction or discrimination against an employee because of their trade union activities, and does not discourage employees from joining organisations of their choice. The Group respects the right to collective bargaining and the role of workers' organisations in the collective bargaining process.

Work time

The EDF group complies with the ILO standards and all applicable laws and regulations governing working time, based on the following principles:

aside from the exceptional cases mentioned by the ILO, regular working weeks should not exceed 48 hours; working weeks are limited to 60 hours, including overtime; workers should have at least one day off for every seven days worked, except in emergencies or unusual situations; workers should have at least three weeks of paid leave for a full year of service; workers are entitled to at least 14 weeks of maternity leave.

Compensation, working conditions, and social benefits

The EDF group strives to comply with the ILO standards on pay, working conditions and employee benefits. The Group is committed to paying a decent wage, covering the basic needs of its employees and their families, and to providing adequate social security cover for all its employees. When employee accommodation is provided by the Company, the EDF group ensures that decent housing or accommodation is provided in compliance with the ILO standards.

At the EDF group, in 2024, all employees received a decent wage, in accordance with the applicable benchmarks.



The rights of affected communities

The EDF group is committed to protecting the rights of the local communities affected by its operations and arranging, systematically and worldwide, transparent, debated discussions and consultations for each new project relating to a facility drawing on a budget of more than €60 million and having a significant impact on the territories or the environment.

The Group recognises the role of human rights and environmental defenders from all walks of life, both among its suppliers and in civil society. It is committed to protecting the exercise of their rights and ensures that it identifies the risks to human rights and environmental activists caused by its business operations and allows them to speak freely about its operations.

The EDF group identifies, for each project, the potential impact on the health, living conditions and environment of local communities, with reference to the performance standards of the International Finance Corporation (World Bank Group) and proposes suitable measures.

Indigenous populations

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

The EDF group is aware of the unique issues facing indigenous peoples and is committed to following the best international standards in this area and, more specifically, the UNDRIP (United Nations Declaration on the Rights of Indigenous Peoples), ILO Convention 169 and World Bank standards. In particular, the EDF group recognises the criteria for characterising indigenous peoples included in these standards, including historical and geographic “pre-existence”, “cultural distinctiveness”, “self-identification”, and “non-dominance”. The EDF group upholds the individual and collective rights of indigenous peoples and

communities, including their right to self-determination, their right to land, territories and resources, and their right to FPIC (Free Prior and Informed Consent) in its projects and activities, as defined by ILO Convention 169.

Whenever its operations threaten or affect the livelihood of a community, the Group implements compensation and/or restoration measures for their livelihood matching or exceeding the level prior to its operations.

The EDF group is committed to respecting and protecting or safeguarding, in agreement with the populations concerned, any expressions of their culture, religion or heritage present on the land used for its operations.

In terms of the use of security forces, the Group is committed to protecting the safety of its employees and sites in strict compliance with human rights, including those of local communities, and only authorises the use of force for preventive or defensive purposes in a manner proportionate to the nature and severity of the threat.

2.2.3.1 Preventing and fighting against all forms of discrimination, physical or moral violence, intolerance or injustice in the workplace

The EDF group makes diversity one of the keys to the success of its “Ambitions 2035” corporate plan. It is also an essential element of its commitments as a responsible company in line with its *raison d'être*. Seeking and promoting the diversity of profiles and their full integration is decisive in enabling the Group to reflect its customers and civil society. This is also one of the conditions for enhancing the Group's attractiveness.

The Group's ethics and compliance policy outlines its compliance programmes and the main rules that managers must be aware of, comply with and ensure compliance within their entities, in strict accordance with the specific risks of faced by these entities. This policy was updated in June 2023. It also includes the harassment and discrimination prevention programme. In addition, the EDF group is committed to developing concrete actions to promote professional equality and the professional and social inclusion of people with disabilities, to combating sexism and violence, to fighting all forms of discrimination and to supporting parenthood.

Within the Group France scope, training and awareness-raising tools as well as reference documents promoting inclusion are made available to employees, the HR department and management. These resources aim to prevent and combat discrimination on the grounds of gender, sexual orientation, real or assumed origin, religious convictions, health status or disability.

2.2.3.1.1. Actions related to gender balance

Strengthening the EDF group's Gender balance Goals

In terms of professional equality, the Executive Committee decided to strengthen in 2021, the company's goals for gender balance at Group level formulated in 2019.

The Group's gender balance goals are being implemented in three areas.

- **1 st area:** Break the glass ceiling, at all hierarchical levels, and accelerate progress at executive level.

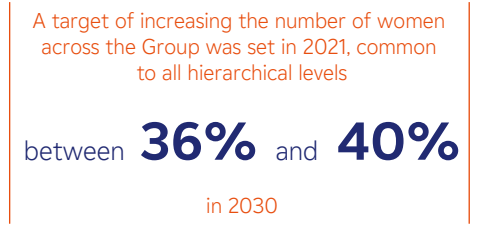
A target of increasing the number of women across the Group was set in 2021, common to all hierarchical levels: 33% in 2026 and between 36% and 40% in 2030, with an increased target of 40% women among the Group's executives at the end of 2030.

- **2 nd area:** Inspire interest in technical and digital professions

The EDF group aims to enhance gender diversity in science, digital technology and innovation, notably by continuing to raise awareness among young girls to encourage them to explore scientific, technical and digital careers, and by better integrating gender diversity into the Group's innovation programmes (Écosystème Pulse, Parlons Énergies, Dispositif Y). Each relevant entity develops a programme to increase the participation of young women in STEMs (Science, Technology, Engineering, Mathematics).

- **3 rd area:** Ensuring non-sexist communication, promoting gender balanced representation.

The EDF group seeks to enhance gender diversity in both its internal and external representation, mainly by encouraging greater female participation in its public engagements.



Results in 2024

The results concern the proportion of women in the Group's workforce as a whole, in the executive category (managers) and on Management Committees.

Management and controls of gender pay equality at EDF: the gender equality index

The gender equality index must be calculated by companies with more than 50 employees and published annually before 1 March. Companies were given a period of three years to reach the threshold of 75 points out of 100 after the first publication of their index. However, with the adoption of the Rixain Law, companies scoring below 85 must now implement corrective actions and notably a salary catch-up budget for women. Therefore, companies are now required to deliver tangible results rather than solely allocating resources.

In 2024, EDF reported a performance of 95 points out of 100 on this index.

	Published in 2022 in respect of 2021	Published in 2023 in respect of 2022	Published in 2024 in respect of 2023
Professional gender equality index (EDF) ⁽¹⁾	90/100	90/100	95/100

(1) Index published before 1 March reference year+1 in respect of reference year.

With this improving score, EDF confirms its strong momentum in terms of gender diversity and equality. Over the past five years, the company has not published an index below 90 points.

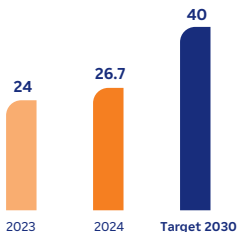
Moreover, the Group is continuing its actions to raise awareness among managers and the Human Resources department on the deconstruction of gender stereotypes.

Attention is paid to the diversification of sourcing to promote the recruitment of diverse employees and enrich work teams. To this end, “recruiting without discriminating” training is made available to all employees in charge of recruitment.

Likewise, Management Committees receive guidance on recognizing their cognitive biases, gender stereotypes and inclusive management. Work is underway to incorporate gender equality considerations into the managerial projects of the various entities.

Women among the Group’s executives

The diversity, and notably the gender balance, of executives and future executives are essential drivers of the Group’s transformation. Thus, beyond the deadlines of the Rixain Law in France, the EDF group has set itself the target of reaching 40% of female representation among all Group executives, including all of its foreign subsidiaries. This target is particularly ambitious in terms of timing, in particular for an industrial group that currently lacks a sufficient pool of women in the short-term to quickly reach 40% women at the senior management level. However, the numerous actions aimed at promoting gender equality allow for a gradual increase in the percentage of women within the Company.



Consequently, EDF updated its action plan to foster executive diversity in 2023, specifically to address this challenge.

The aim is to accelerate the increase in the proportion of women in senior management by working on the various stages of career management that can lead to this path, to act on direct levers (internal promotions and external recruitment of women executives and to mobilise senior managers around this objective (performance criteria in bonuses and contributions to Management Committees). Notably, the following actions were carried out or reinforced in 2024:

- increasing executive accountability by introducing in 2024 a new gender balance performance criterion in the bonuses of the Group’s executives, in addition to the existing criterion in the long-term remuneration plan;
- strengthening the requirement for gender diversity in internal applications for executive positions in the appointment bodies;
- establishing an annual Career Committee (People Review) dedicated to women, notably potential future women executives;
- strengthening and expanding existing specific support for future women leaders (mentoring, coaching, co-development, leadership disclosure, etc.);

- the implementation of support and mobilisation of Management Committees, by raising awareness of cognitive biases and the need to implement inclusive management, allowing the integration of gender issues into the managerial projects of entities;
- sourcing of women executives or future executives outside the company to further increase the representation of women in the pool.

In addition to these actions, a longer-term structural transformation is underway for the company’s talent management: the roll-out from 2025 of a new leadership development system, designed to identify and support the company’s future leaders. This system will be accessible to a larger number of managers, with a view to greater inclusion, but will also be more attractive to younger generations, with the long-term aim of developing a more diverse and mixed management pool.

In terms of gender diversity, as of 31 December 2024, 31.4% of EDF SA’s 10% most senior positions were held by women, compared with 30.6% as of 31 December 2023, an increase of 0.8 pt compared with 2023.

Gender mix of the Board of Directors

The proportion of women on the Board of Directors is in compliance with the statutory threshold. The Committees in charge of remuneration, appointments and governance, of corporate responsibility, of risks and of audit are chaired by women.

2.2.3.1.2. Actions related to the fight against sexism and violence

Combating sexism and violence

The EDF group is convinced that the Company’s performance depends on the respect for the dignity of people at all levels and is committed to combating all forms of workplace violence and harassment and to combating sexism at work. The Group has zero tolerance for sexual harassment. Each employee, regardless of their level of responsibility, must be able to feel considered, respected and protected.

EDF provides a toll-free hotline, operating seven days a week, for all employees to confidentially seek support and obtain guidance on all harassment and discrimination concerns. A support team (with in-house and external skills) intervenes in investigations carried out when alerts are reported. The EDF group maintains a strict zero-tolerance policy for any form of workplace violence.

EDF launched an action to promote employee dialogue on diversity and changing mentalities: “Let’s talk about gender diversity”, the objectives of which are to:

- dialogue directly with employees on gender and gender equality;
- gather employees’ perceptions of the reality and effectiveness of the actions carried out in their daily work;
- identify weak signals and priorities for action using collective intelligence.

EDF has created a new awareness-raising tool: “Stop sexist and sexual violence” (“STOP aux violences sexistes et sexuelles”), inspired by the Centre Hubertine Auclert’s “violentometer” (“*violentomètre*”)¹⁴ but specifically tailored to address workplace violence.

Fight against domestic and intra-family violence: a support, awareness-raising and care system for victims

The subject of domestic violence was included for the first time in the EDF SA Professional Equality Agreement in 2017 and then included in the new 2021 agreement. It is now also included in the professional equality agreements of the companies Enedis (2021), EDF Renewables (2023), RTE (2020). It has taken on a sectoral dimension with the Professional Equality agreement for the electricity and gas industry branch (2024).



At EDF, these measures were operationally implemented in partnership with the Company’s medical and social teams and the “one woman, one roof” (“FIT, une femme un toit”) association notably. In 2024, EDF once again assisted, accompanied, supported and referred 164 employees who were victims of domestic violence, i.e. more than 817 employees supported between 2019 and 2024..



2.2.3.1.3. Support for parenthood and caregivers

The topic of support for parenthood and family caregivers is an integral part of French legislation and applies to the Group’s scope in France.

For Group companies in the electricity and gas industries, the EDF group is reinforcing its support systems for parenthood and family caregivers following the “Family rights” sector agreement of 15 December 2017:

- new rights for family caregivers (access to an advice and services platform, additional remuneration covering three caregiver leaves of absence to help a disabled or independence-loss relative);

- creation of parenting leave available to both women and men, accommodating the diverse structures of modern families, including single-parent families and parents of children with disabilities;
- possible extension of paternity and childcare leave for parents who wish to do so, by converting part of the birth bonus into additional days (with a basic minimum of 5 weeks of paternity leave and 16 weeks of maternity leave);
- financial aid for children’s education costs;
- CESU system pre-financed to the tune of 80% by the company for parents of children under the age of 12 and increased support for single parents or parents of children with disabilities.

Breast-feeding mothers are supported by entitlement to paid authorised absence of up to one hour per day (not prorated on the basis of time worked), for one year following the child’s birth.

The Group is committed to equal opportunities in career development for all through several types of action: at EDF, equal access to training and career advancement is reflected in the reimbursement of additional childcare costs following a long training course or one requiring travel.

2.2.3.1.4. Disability plan, a long-standing commitment

EDF is one of the first major French companies to be involved in the professional and social integration of people with disabilities, committing to go well beyond the legal requirements. The 12th EDF agreement for equal rights and equal opportunity, and the occupational inclusion of disabled people, was signed on 11 January 2023 for the 2023-2025 period.

At the sports level, this commitment has been reflected since 1992 by the partnership with the French Handisport Federation. EDF was also a partner of the Paris 2024 Paralympic Games.

The EDF group strives to embrace all skills and energies, without exclusion. Thus, the Group facilitates the professional integration of people with disabilities across its entities. By the end of 2024, the Group employed 8,096 individuals with disabilities, a sharp increase compared to 2023. In particular, in 2024, EDF employed 2,997 employees with disabilities (4.4% of its workforce as of 31 December 2024).

Group scope	2022	2023	2024
Number of employees with disabilities	6,791	7,054	8,096
% of employees with disabilities	4.0%	3.9%	4.2%

14 <https://www.centre-hubertine-auclert.fr/egalitheque/publication/le-violentometre>

EDF pays particular attention to the integration and quality of life of its employees with disabilities. One of the flagship actions of the 2023-2025 agreement was the renewal of the Quality of Life at Work Survey. This survey, already carried out for the first time in 2021, covered 2,584 employees with disabilities at EDF and benefited from a participation rate of 72%, an increase of six points compared to

2021. As in 2021, the results highlight the generally positive feeling about the quality of integration into the Company (74% of employees say they are satisfied) and job satisfaction (78%, +4 points compared to 2021); EDF is working to improve career opportunities for employees with disabilities, aiming to ensure true equality of opportunities and preventing all forms of discrimination.

In operational terms, a large number of projects are developed internationally, notably by the Group's International Department or by EDF Renewables.

Human rights risks are understood and managed at the various stages of the projects:

1. At the pre-development phase

For “new” countries, an assessment is carried out using the Verisk Maplecroft® tool, or other internal and external sources: specific due diligence can also be carried out for particular sectors with identified risks.

2. During the development phase

A Human Rights Impact Assessment and Management (HRIAM) study may be launched, depending on the country risks identified and the specific features of the project, in order to clarify the human rights context in the project area, in relation to future development and construction activities:

- clarify the human rights context in the project area, in relation to 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.

3. Human rights clauses

Human rights clauses are systematically included in the project's main contracts (“EPC” type), for the construction of major infrastructures such as hydropower, solar power and wind farms, but also for smaller contracts such as photovoltaic generators for “C&I” (Commercial and Industrial) customers, notably in sub-Saharan Africa.

4. 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).

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

The EDF group does not tolerate any infringement of human rights and fundamental freedoms, either in its activities or in those of its business relationships when their activities are related to this relationship.

Human rights commitments are implemented as part of the Group's CSR commitments and requirements.

Depending on the context of the project, a Human Rights Impact Assessment and Management (HRIAM) is conducted. It is based on the principles defined by the UN Guiding Principles on Business and Human Rights. These studies place the identification of impacted human rights at the centre of the analysis. 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 “rightsholders” 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 Human Rights contacts. 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 Human Rights policy, Human Rights 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.



Combined cycle gas project in Uzbekistan

In Uzbekistan, EDF, Nebras, Sojitz and Kyuden are developing a combined cycle gas turbine. Its construction is entrusted to Harbin Electric International and its financing is provided by the International Finance Corporation. More than 1,100 workers are currently mobilised at the site, half of whom are recruited locally and the other half of whom are Chinese workers. They should be close to 2,500 at the peak of construction. Particular attention is paid to the working conditions of workers on the construction site with the application of good international practices for health and safety aspects (OHS). The accommodation conditions were particularly controlled at the start of construction, when the remote camp was not yet available. In 2024, attention was paid to contractual aspects (employment contracts, quality of payslips, notably for Chinese employees recruited in China), compliance with working hours, free movement of employees, as well as health and safety aspects

(start of work at height). The requirements of the client (the Project) are reported in the construction contract and “cascaded” into the chain of subcontractors. An ESHS team (dedicated to the environmental, social and health and safety fields) is in charge of verifying the due CSR performance of the manufacturer and its subcontractors, in close collaboration with the same team present on the manufacturer’s side.

The 30 hectares of agricultural land required for the construction of the power plant did not necessitate the physical removal of people. The fifteen or so farmers who used this land and trees (whether fruit bearing or not) were compensated, at a level higher than that required by national regulations. Support programmes for their professional activities are rolled out. An independent consultant (the Lender’s Independent E&S Consultant - LIESC) checks quarterly that the lenders’ ESHS requirements are being met. The drawdowns of loans throughout the construction phase are subject to compliance with these covenants.

Hydropower plant in Malawi

In Malawi, the consortium between EDF and the Norwegian company SCATEC is developing the Mpatamanga project to build a 361 MW hydropower plant, launched by the government, which began in 2022 with commissioning scheduled for 2025 or 2026. This project has a request and complaints management mechanism allowing stakeholders to send their requests, complaints and questions to the project company MHPL (Mpatamanga Hydro Power Limited, a company incorporated under Malawian law). These can be addressed in different ways:

- in physical form, to a member of MHPL, the Ministry of Energy in Lilongwe or a member of a GVGR (Group Village Grievance Redress Committee)¹⁵;
- by phone, SMS or WhatsApp;
- by post or email.

Requests and complaints are sorted by category for processing by MHPL and GVGR:

- complaints are handled according to the standard request and complaint management procedure described in the diagram below;
- incidents are handled according to the ESHS (Environmental, Social, Health and Safety) incident resolution procedure;
- gender-based violence, harassment, sexual exploitation and abuse are addressed through the GBV (Gender-Based Violence) procedure;
- questions, observations and comments are sent pursuant to the QCC (Questions, Comments & Concerns) management process. MHPL informs stakeholders of the existence of this mechanism through GVGRs in the field as well as through the dissemination of information at the community cinema and other media. Since the start of the project, 20 complaints have been received, of which 19 have been resolved and one was still in the process of being resolved at the end of 2024.

¹⁵ Group Village Grievance Redress Committee (GVGR): committee formed at the village level involved in managing complaints from communities impacted by the project. A GVGR is made up of a member of the village development committee, two people affected by the project, a representative of the community police, women, young people and the local religious organisation, as well as a member of the National Resource Management Committee, a worker and the village chief

Hydropower plant in Cameroon

In Cameroon, the Nachtigal project, for which the construction of a 420 MW hydropower plant began in 2019 with a gradual commissioning scheduled between 2024 and 2025, has rolled out a SEP – stakeholder engagement plan – across all phases of the project.

The stakeholders in the Nachtigal project were identified, the main ones being: PAPs - people affected by the project - (farmers, fishermen, fishers, operators, sandblasters), young people, women, decentralised local government, district chiefs, traditional authorities (village chiefs, notables), local communities, ministries and school managers.

The SEP included various stakeholder engagement strategies:

- information and consultation meetings for people affected by the project, vulnerable people, leaders of local organisations, village leaders, mayors and school managers;
- awareness-raising meetings on health and safety topics for schools, local associations and companies;

- targeted campaigns (by phone, text message, e-mail) dedicated to central and local administrations and local associations to invite them to attend information meetings;
- community consultation forums organised in the villages;
- the definition of a framework for regional consultation with mayors, and regional and municipal councillors;
- a focus group for vulnerable people and fishers;
- site visits and meetings with local residents and manufacturers.

In total, more than 140 meetings were organised with stakeholders on the topics of resettlement, livelihood restoration, training, economic development and awareness-raising.

Communication methods were also defined in the SEP, including direct correspondence, posters and flyers, the Nachtigal website, social networks, a WhatsApp group for administrative and municipal authorities, local radio with a monthly programme, as well as billboards.



Dalkia

Following the acquisition of US Chillers, a Dalkia subsidiary based in Dubai, Qatar, Bahrain, Saudi Arabia and the United States, and its integration into the Group, an internal health and safety audit was carried out in 2023. This entity has around 380 employees outside the United States, 99% of whom are migrant workers. A diagnosis of working conditions and health and safety was finalised, and the roll-out of health and safety practices was undertaken. The following measures were implemented: work to bring into compliance the collective housing for workers in Dubai and Bahrain, and establishment of a minimum wage. Integration work continued in 2024, with the following actions notably:

- the roll-out of ISO 9001 and 14001 standards in Bahrain and Qatar at the end of 2024;
- the planned roll-out of ISO 9001, 14001 and 45001 standards in Saudi Arabia in 2025 and 45001 in the UAE, Bahrain and Qatar in 2025/2026;
- the introduction of an allowance for the use of their personal smartphone and an allowance for the cleaning of clothes;

- roll-out for Dalkia US Chillers of safety training sessions at customer sites from November 2024 until the end of 2025;
- an audit of the housing conditions of subcontractors in Saudi Arabia and the definition of an action plan to be undertaken by local management in 2025.

Ongoing litigation under way in Mexico

In 2018, an NGO made a complaint to the OECD's French national contact point (NCP) about the planned Gunaa Sicaru wind farm, to be managed by a subsidiary of EDF Renewables in Mexico.

During the course of the OECD mediation process, the EDF group took part in two dialogue meetings with the applicants and provided some responses to the concerns raised. The French NCP closed the matter in spring 2020. On 12 July 2022, the same NCP published a follow-up statement noting the strengthening of EDF's corporate policy and its work done on human rights and engagement with stakeholders. As these measures met its recommendations, the NCP ended its monitoring of the matter¹⁶.

The indigenous consultation process conducted by the Mexican authorities was suspended following an earthquake in 2018, and then due to the Covid-19 pandemic. The consultation process had still not resumed as of 31 December 2024, despite an order from a local judge requiring it to be resumed at the end of August 2024.

In parallel, in December 2019, EDF responded to a formal warning concerning the same project issued under the French duty of vigilance law by the same NGO and by four individuals. EDF was then subpoenaed on 13 October 2020 to appear before the Paris Court (Tribunal Judiciaire) in accordance with the French duty of vigilance law. The applicants have asked the court to order changes to EDF's vigilance plan, particularly in order to better address the risks posed to the rights of indigenous communities, and to order compensation for the prejudice caused by its alleged failure to fulfil its duty of vigilance. EDF contests both applications. On 30 November 2021, the pre-trial judge dismissed the association's request to suspend the project as a precautionary measure, as well as their request for an injunction concerning the EDF vigilance plan, due to the lack of prior formal notice. The Court

proposed mediation, and EDF accepted. The plaintiffs then appealed the pre-trial judge's decision. During the deliberation of 18 June 2024, the new 5-12 Chamber of the Paris Court of Appeal, in charge of emerging disputes, reversed the order of the pre-trial judge concerning the formal notice. Notably, the court considers that it must clearly identify the alleged breaches, and that the summons may relate to a vigilance plan different from that referred to in the formal notice. However, the court rejected the request to suspend the project on the grounds that the request for a precautionary measure relates not to the obligations of EDF SA in terms of its duty of vigilance, but to the project itself, and is subject to Mexican jurisdictions. No urgency or imminence of future attacks has been demonstrated. The case is referred on the merits to the Paris Court of Justice. The progress of the project is monitored at the same time by the members of the CDRS.

A special website on the Gunaa Sicaru project is available in English and Spanish:

<https://www.gunaa-sicaru.com>

¹⁶ <https://www.tresor.economie.gouv.fr/Articles/2022/07/26/pcn-francais-edf-et-edf-renouvelables-au-mexique>

2.3 Environment

2.3.1 Identifying salient risks

Group risk mapping is established by reference to the Group's various industrial activities. Environmental risks are identified, assessed, and ranked through the environmental management system (EMS) and the internal control system, in liaison with Group risk management.

The identification of environmental risks is part of the Group's overall risk management practices. Each entity defines action plans to reduce and control its risks on the basis of its risk mapping.

The 2024 update to the risk mapping confirms the 2023 risk analysis, and does not highlight any new environmental risks. The main change is that the impact of the acceleration of climate change is now taken into account, together with the systemic challenge of this risk for EDF and all of its stakeholders.

2.3.2 Monitoring indicators



Salient environmental risks

Salient risk	Generation activities most exposed	Risk criticality	Material negative impact	Group risk ¹⁷
Greenhouse gas emissions with effects on the climate:				
- Direct emissions (Scope 1)	- Electricity and heat generation from fossil fuel	■ ■	ESRS E1 Greenhouse gas emissions	5B
- Indirect emissions (Scope 3)	- Supply of gas and electricity, electricity generation by non-controlled plants	■ ■		5B
Discharges with potential effects on:				
- air quality: mainly SO ₂ , NO _x and dust emissions	- Electricity and heat generation from fossil fuel	■	ESRS E2 Discharges with effects on air, water and soil quality	1I
- water quality: mainly thermal discharge from thermal power plant cooling systems	- Electricity generation by thermal power plants (nuclear, fossil fuels)	■		1I
Consumption with potential effects on:				
- material resources: including materials used in building new facilities, and waste generation	- All types of electricity generation (nuclear, thermal, hydropower, wind and solar power)	■ (existing generation)	ESRS E5 Waste generation	1I
		■ ■ (projects)	ESRS E4 Impact via upstream resources	1A, 1I
	- freshwater resources: evaporation due to closed-circuit cooling of thermal power plants and to industrial processes	- Electricity generation by thermal power plants (nuclear, fossil fuels)	■ ■	ESRS E3 Use of fresh water
Potential impacts on biodiversity:				
- Changing land and sea uses: mainly land take for new projects	- All types of electricity generation (nuclear, thermal, hydropower, wind and solar power)	■ ■	ESRS E4 Ecosystem degradation	1A, 1I
- Overexploitation of natural resources: notably forests	- Electricity and heat generation from biomass	■ ■	ESRS E4 Impact via upstream resources	1I

Net criticality of control actions: ■ ■ ■ high ■ ■ intermediate ■ moderate

17 See appendix "Risks to which the Group is exposed" p.75

2.3.3 Principal prevention, mitigation and monitoring measures implemented

2.3.3.1 Environmental Management System

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

To define the environmental goals and related actions deriving from its CSR commitments and policy, the EDF group promotes Group-wide environmental awareness through its EMS. This management system relies on EDF's governing bodies, which define the environmental guidelines and objectives to be achieved, in line with the expectations of external and internal stakeholders.

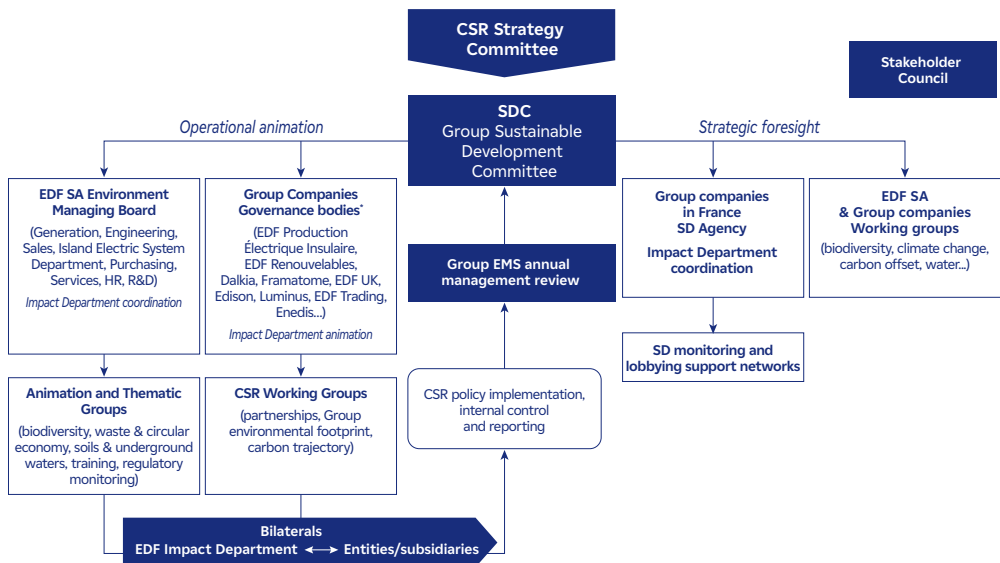
In accordance with the requirements of the CSR policy, each of the Group's entities¹⁸ and projects is implementing an environmental management approach adapted to its own concerns.

The EMS operates through Group, entity and function processes, to give stakeholders formal assurance that:

- environmental risks are under control and the EDF group complies with regulations and its commitments:** each entity draws up

and implements an environmental programme or action plan that takes account of the relevant Group commitments, its own significant environmental aspects and its regulatory obligations, considering its risks and opportunities;

- the Group's organisational efficiency is being improved in a way that is appropriate to the challenges faced:** each entity is responsible for its own internal control, internal and external audits of its EMS, and interfaces with the Group EMS;
- its internal control, as well as internal and external audits of its EMS, interfaces with the Group's EMS;**
- mandatory non-financial reporting on the entities' environmental activities is in place:** each entity collects and communicates the required environmental information to the Impact Division.



* Environment managing boards or equivalent

The Group's EMS is certified compliant with international standard ISO 14001 by an external body, the French Standardisation Association (Association française de normalisation – AFNOR). All industrial sites are covered by an EMS, and more than 80% of them are certified.

¹⁸ Companies with industrial, operational (installation, operation, maintenance), engineering, distribution and supply activities for goods and services.

The latest certification audit campaign, conducted by AFNOR between April 2023 to March 2024, confirms that the environmental management systems of the certified entities and subsidiaries are effectively and genuinely embedded within the Group's practices and culture. The Group's environmental policy was assessed as ambitious and aligned with the key challenges facing EDF, particularly regarding climate and biodiversity. Expertise and skills are shared with the regions, with a view to improving the management of the environmental impacts. These audits identified four new minor cases of non-compliance, with the minor cases from the previous audit campaign having been resolved. The main area for improvement concerns the management of action plans, specifically the need for more robust root cause analysis and enhanced monitoring of the effectiveness of corrective measures, particularly for compliance-related actions.

2.3.3.2 Preventing impacts on the climate

In the face of climate emergency, the EDF group aims to develop, wherever it is present, a new energy model that emits less CO₂, is more efficient, and is more respectful of the environment and people, in accordance with the Group's raison d'être. To mobilise accordingly, the Group is implementing a climate transition plan, focusing on three axes, supported by the Group's highest levels of governance, with the appointment of climate officers within the Group's Board of Directors and Executive Committee. The EDF group is engaged in an accountability process focusing on the 10 Recommendations of the United Nations HighLevel Expert Group on the Net-Zero Emissions Commitments of NonState Entities (UN HLEG).

Carbon intensity



Ambition of achieving "Net zero emissions" by 2050

The EDF group is the world's leading producer of electricity with no direct CO₂ emissions. As a ration of its production volume, the CO₂ emissions of the Group are much lower than those of other major electricity producers. In line with this role as a leader in the decarbonisation of the economy, and consistent with its purpose of building a CO₂-neutral energy future, the EDF group has set a target of achieving "Net Zero" emissions across all of its activities by 2050. This target covers greenhouse gas emissions across all scopes (1, 2 and 3)²¹ and all geographic regions²². It is based on the definition included in the CSRD²³. The Group's Net Zero ambition is linked to the CSR policy, for which the Impact Division is responsible, and to the "Ambitions 2035" corporate plan. The results are presented to the Executive Committee annually.

This long-term ambition is supported by short- and medium-term reduction targets that are established and reviewed regularly, and are translated into emission trajectories for all of the Group's business lines and entities. The Group's carbon trajectory, whose ambition was strengthened in 2023, was validated as compatible with a 1.5 °C warming scenario by Moody's. These targets relate to the Group's direct and indirect emissions. In addition to the monitoring of Group emissions, the definition of the carbon trajectory contributes to the orientation of the Group's strategic choices and investments.

	Reducing the Group's direct greenhouse gas emissions to zero or almost zero by 2050
Net Zero by 2050	Reducing direct and indirect emissions by at least 90% ¹
	Neutralising residual emissions through high integrity carbon sinks ²

1. Compared to the reference year used for the definition of the 2030 targets.
2. Neutralisation after 2030 only, in line with the principles defined in the report of the United Nations High-Level Expert Group on the Net-Zero Emissions Commitments of Non-State Entities (November 2022).

19 2023 data, EU-27, European Environment Agency, Greenhouse gas emission intensity of electricity generation in Europe, October 2024.
20 2023 data, International Energy Agency, World Energy Outlook 2024.
21 For the definition of the three scopes, see section 3.2.2.1.3.1 "Group carbon footprint - annual GHG emissions" of the Universal Registration Document 2024
22 For details on the scope used, see section 3.2.2.1.3.1 "Group carbon footprint - annual GHG emissions" of the Universal Registration Document 2024
23 Annex II Acronyms and Defined Terms, Net-zero target.

Developing the use of electricity, energy efficiency and innovative energy services

The development of the use of low-carbon electricity is one of the key areas of work in the fight against global warming, by reducing the carbon footprint of the Group's customers. For France, this translates into a target of 150 TWh of additional electricity demand, compared to 2023, by 2035 to replace carbon-intensive energies. This ambition, which can be replicated in all countries where the Group operates, is in line with all decarbonisation scenarios, in particular those of the IEA and NGFS, as well as the French national low-carbon strategy (Stratégie Nationale Bas Carbone). The associated policy aims to support customers and regions in the decarbonisation of their activities, through a wide range of offers adapted to the various markets, making it possible to exploit revenue opportunities, new markets for the Group and new sources of financing, and through the development of energy-efficient solutions, innovative technologies, low-carbon offers (self-consumption, energy efficiency, electric mobility, etc.).

This implies having favourable conditions for such a development, via strengthening the robustness, intelligence and flexibility of the network, better management of intermittency and flexibility and development of storage, the search for technical and financial innovations to provide sustainable electricity and a reasonable price, and a requirement for the quality of the service offered.

This policy applies to the Group's distribution and marketing activities. It is part of the corporate strategy coordinated at Executive Committee level.

Generate more low-carbon electricity

The IPCC classifies electricity generation technologies as either unabated fossil fuel technologies, e.g. gas or coal without any carbon capture and sequestration system and therefore generating direct greenhouse gas emissions, in contrast to low-carbon technologies, i.e. with little or no direct greenhouse gas emissions²⁴ (such as hydropower, nuclear, wind and solar, bioenergy, fossils with carbon capture and storage (CCS)).

According to Enerdata's latest annual ranking²⁵, the EDF group is the world's leading producer of electricity with no direct CO₂ emissions, due notably to the size of its nuclear and hydropower generation fleet. The Group's electricity generation mix was 94% decarbonised in 2024.

The Group aims to produce more low-carbon electricity with all the technologies that contribute to it, by relying on nuclear and all forms of renewable energy. To this end, the Group aims to maximise the availability and operating lifespan of all of its low-carbon assets, in particular its existing nuclear fleet, while ensuring the best conditions of safety and performance. The Groupe also aims to build new high- and low-power nuclear reactors, and to accelerate the development of renewable energies. This ambition is aligned with climate scenarios compatible with the Paris Agreement, which all highlight the need to meet the demand related to the electrification of uses with low-carbon technologies, just like EDF's Net Zero scenario at European level²⁶. It translates into targets for net

low-carbon electricity generation and the development of gross renewable capacity.

As part of its strategy, the Group also ambitions to continue to deploy renewable capacity and flexibilities to ensure the stability of the networks. On the supply side, in addition to the flexibility already provided by the nuclear and hydropower plants, the Group will develop storage resources and will continue to decarbonise flame-based thermal generation facilities. Regarding customers, flexibility solutions involve steering consumption accordingly (in order to move it towards the most advantageous time periods for the electricity system), in particular via "smart" recharging of electric vehicles or consumption shedding.

Lastly, the public networks managed by Enedis, EDF SEI and Strasbourg Électricité Réseaux will have to continue their transformation in order to meet the challenges of tomorrow's electricity system and the new connection needs (for new renewable capacity, electric charging stations, etc.)

²⁴ Does not include emissions relating to the fuel supply chain and the life cycle of other components of the production system.

²⁵ The annual benchmark for electricity producers: [power-producers-ranking.enerdata.net/](https://www.enerdata.net/power-producers-ranking)

²⁶ www.edf.fr/en/the-edf-group/edf-at-a-glance/reference-publications/edf-scenario-net-zero-205

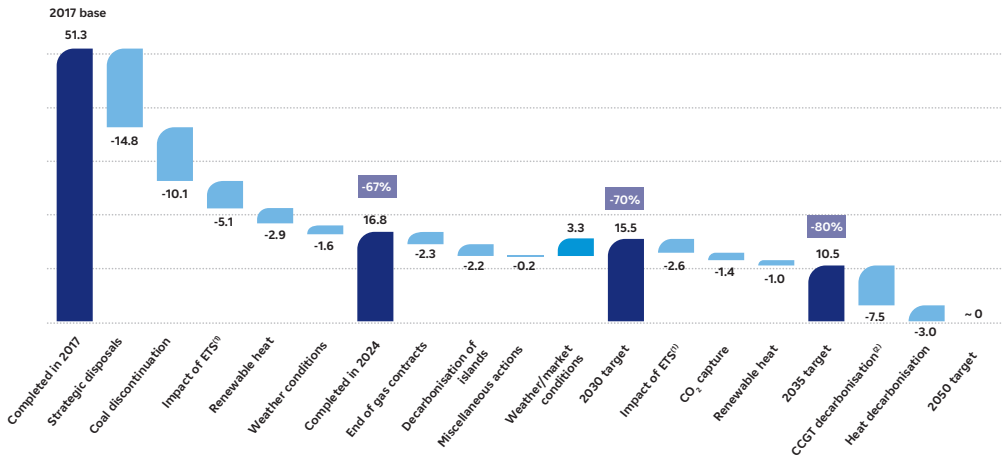
Actions related to climate change mitigation

Own operations: reduce the Group's direct emissions, generate more low-carbon electricity

- Reduction of direct emissions

Scope 1 net zero trajectory between 2017 and 2050

(in MtCO₂e)



(1) EU ETS : European Emissions Trading Scheme.

(2) CCGT : cycle combiné gaz thermique.

Actions to reduce direct emissions

Strategic disposals	Strategic disposals of carbon-intensive assets, particularly in Poland.
Coal discontinuation	Closure of the coal plants at Cottam (FR), West Burton A (UK) and Le Havre 4 (FR), with training and reassignment of staff.
Impact of the ETS	Reduction in demand on combined cycle gas turbine plants by the network due to the price of CO ₂ in the European ETS market and priority injection of renewable energies.
Renewable heat	Greening of the heating networks managed by the Group using biomass, waste heat recovery, and geothermal and oceanic thermal energy conversion.
Optimisation of the use of low-carbon generation facilities (weather conditions)	Optimisation of the use of the various generation facilities according to weather conditions: very limited use of CCGT in Brazil in 2023 due to the hydraulicity conditions.
End of contracts	Expected decrease in the electricity output due to the end of the PPA ²⁷ for the Norte Fluminense plant in Brazil, transfer of the MECO plant in Vietnam at the end of the Build Operate Transfer-type contract.
Decarbonisation of islands	Replacement of light and heavy fuel oil used in non-interconnected zones with liquid biomass, in coherence with their local multi-year energy programme.
Miscellaneous actions	Reduction of diffuse emissions of sulphur hexafluoride (SF ₆) from electricity transmission and distribution equipment as well as diffuse emissions of hydrofluorocarbons (HFC) from air conditioning systems; complete electrification of the EDF group's light vehicle fleet as part of the EV100 commitment.
Capture of CO ₂	Commissioning of a first CO ₂ capture and storage system on a EDF group combined cycle gas turbine in Italy. "Decarbonisation of the EDF group's fossil fuels" ²⁸ .

27 Power Price Agreement.

28 The aim of the Group-wide "decarbonised thermal energy" strategic project is to identify the various decarbonisation systems or techniques for thermal generation facilities (boilers, combined cycles, combustion turbines, engines) that traditionally run on fossil fuels (coal, natural gas and fuel oil).

• Low-carbon generation

EDF, Europe’s biggest investor in decarbonised energy²⁹.

The EDF group is investing heavily in low-carbon electricity generation facilities to help build a CO₂-neutral energy future.

The mix of the Group’s electricity generation in 2024 comprised 77.7% nuclear, 10.7% hydropower, 5.9% other renewable energies, 4.9% gas, 0.8% fuel oil and less than 0.04% coal³⁰.

By 2035, the main actions that will enable the EDF group to achieve its decarbonised generation targets are as follows:

Roadmap for increasing the Group’s decarbonised generation

Subjects	Actions
Extension of the operating life of existing nuclear assets	Continued operation of France’s nuclear fleet beyond 40 years thanks to the Grand Carénage industrial refurbishment programme.
Nuclear New Build	France: development of a programme of six EPR2 reactors and study of the feasibility of eight additional reactors. United Kingdom: construction of two EPR reactors at Hinkley Point C and development of a project for two reactors at Sizewell C (minority stake).
Development of renewable energies	Development of gross installed renewable energy capacity commissioned by the Group.
Network development	Development of networks to meet connection needs and increase network resilience and intelligence.
Increase flexibility solutions	Development of storage, “greening” of flame-based thermal generation facilities and development of customer flexibility to ensure the balance between supply and demand.

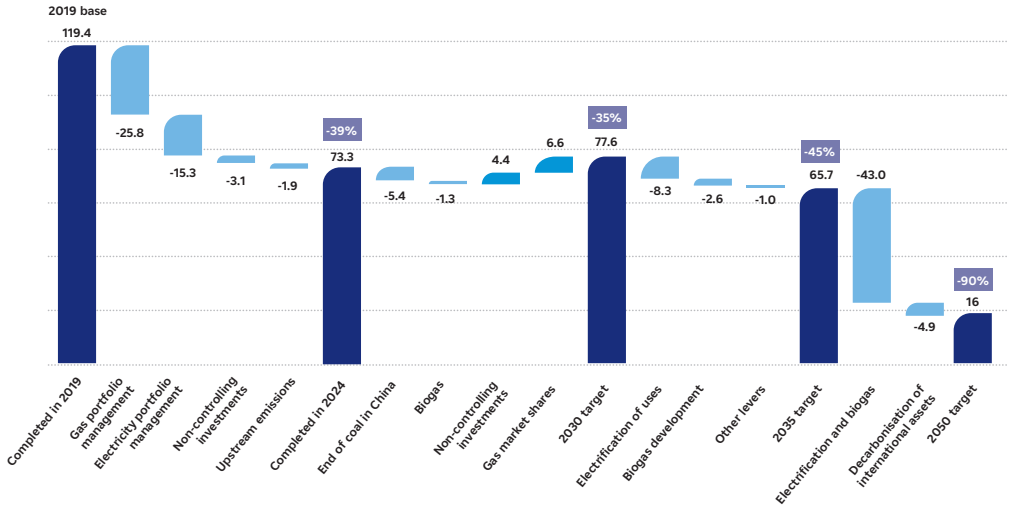
Value chain: reducing the Group’s upstream and downstream indirect emissions

• Reduction of indirect emissions

EDF is taking action to reduce its indirect emissions upstream and downstream of its value chain.

Scope 3 net zero trajectory between 2019 and 2050

(MtCO₂e)



29 10th financial survey of European energy companies “Watt’s Next Conseil”, June 2024; wattsnext.fr/wp-content/uploads/2024/07/Watts-Next-Barometre-financier-2024.pdf

30 In consolidated data

Actions to reduce indirect emissions in the value chain

Gas portfolio management	Management of the EDF group's gas customer portfolios, particularly in North America.
Electricity portfolio management	Greening (use of renewable energy Power Purchase Agreements) of purchases of electricity for sale to end customers, in particular in countries where electricity has a high carbon intensity; portfolio management for customers for whom EDF sells but does not generate electricity.
Upstream emissions	Reduction in upstream emissions proportional to the reduction in the EDF group's thermal production and the reduction in gas sales.
End of coal in China	Gradual divestment by 2030 from coal-based electricity generation assets located in China in which the EDF group has a minority stake.
Non-controlling stakes	EDF's minority stakes in new international gas assets, contributing to the decarbonisation of the countries concerned (EDF group's responsible gas criteria).
Gas market share	Short-term organic growth in EDF gas sales in Europe.
Electrification of uses	Supporting customers towards energy sobriety, energy efficiency and lower emissions through the Group's offers, expertise and subsidiaries, by promoting in particular alternative solutions to fossil fuels.
Biogas development	Increase in the rate of biomethane injection into the natural gas distribution network in line with national lowcarbon strategies..
Other levers	Reducing emissions from employee travel, in view of the roll-out of the EDF group's new travel policy.

Indicators related to climate change mitigation

- Net Zero long-term commitment

All Group targets and indicators defining a trajectory compatible with 1.5°C

EDF group indicator	Achieved 2023	Achieved 2024	2025 milestone	2027 milestone	2030 target	2035 target	2050 target
Carbon intensity (gCO ₂ /kWh)	37	30			30	22	~ 0
Scope 1 (MtCO ₂ e)	19	16.8	20.0	18.0	15.5	10.5	
% reduction vs. 2017 (2017 baseline data: 51.3 MtCO ₂ e)	-63%	-67%	- 60%	- 65%	-70%	-80%	Net Zero
Scope 3 (MtCO ₂ e)	72	73.3		83.6	77.6	65.7	- 90% ³¹
% reduction vs. 2019 (2019 baseline data: 119.4 MtCO ₂ e)	-39%	-38%		-30%	-35%	-45%	
Scope 3 emission (MtCO ₂ e vs. 2019)	-41%	-37%			-28%		

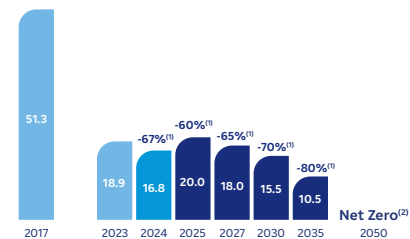
- Reduction of direct emissions

Scope 1 objectives

2025 target	60% reduction in Scope 1 emissions compared to 2017, i.e. 20.0 MtCO ₂ e
2027 target	65% reduction in Scope 1 emissions compared to 2017, i.e. 18.0 MtCO ₂ e
2030 target	70% reduction in Scope 1 emissions compared to 2017, i.e. 15.5 MtCO ₂ e
2035 target	80% reduction in Scope 1 emissions compared to 2017, i.e. 10.5 MtCO ₂ e

31 To neutralise the residual emissions (with a view to net zero emissions), the use of carbon contribution projects, aimed at "sequestering" the CO2 present in the atmosphere and storing it, is only considered after 2030

Scope 1 emissions (in MtCO₂e)



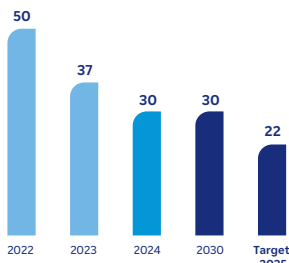
(1) Vs 2017.
(2) Over the 3 Scopes.

The direct emissions reduction target applies to all of the Group’s Scope 1 emissions, and ensures that the Group operates on a trajectory compatible with a warming of 1.5°C. It takes into account internal strategic assumptions, in particular the evolution of the Group’s thermal generation fleet, and is based on scenarios compatible with the Paris Agreement. EDF aims to reduce its direct emissions by 60%, 70% and 80% by 2025, 2030 and 2035. This represents an absolute reduction of approximately 41 MtCO₂e i.e. 2035 compared to 2017. In 2024, EDF’s Scope 1 emissions reached 16.8 MtCO₂e, i.e. a reduction of 67% compared to 2017.

Carbone intensity trajectory

2030 target	30 gCO ₂ /kWh carbon intensity
2035 target	22 gCO ₂ /kWh carbon intensity

Change in carbon intensity (in gCO₂/kWh)



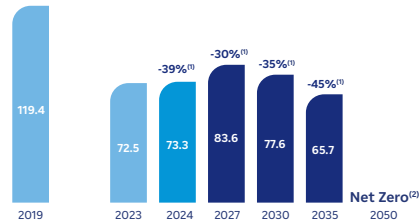
The emissions reduction efforts are also reflected in the carbon intensity of the Group’s electricity and heat generation, which amounted to 30 gCO₂/kWh in 2024, i.e. the target set for 2030, and down by 7 gCO₂/kWh compared to 2023. The carbon intensity of the electricity and heat produced by the EDF group is around seven times lower than the European average (210 gCO₂/kWh³²) and more than 15 times lower than the global average (458 gCO₂/kWh³³). In addition to the effect of the reduction in direct emissions, the change in carbon intensity reflects the increase in the Group’s low-carbon production in 2024. All of the Group’s sectors contribute: +11% for nuclear, +30% for hydro, and +7% for wind and solar. In 2024, nuclear generation amounted to 404TWh, i.e. +40.8TWh compared to 2023, particularly in France where EDF’s nuclear generation exceeded initial forecasts, exceeding 361 TWh at the end of the year. Between 2023 and 2024 the hydropower generation increased by 12.7TWh, due to the performance of generation tools and very good hydraulic conditions. The share of fossil-fuel generation in the Group’s total electricity generation and heat production was only 8% in 2024, at 44TWh, down by 4TWh compared to 2023. However, this performance was the result of market and demand conditions that were particularly favourable to a low level of use of fossil fuel-based electricity generation facilities. It is not guaranteed that a level below the 30 gCO₂/kWh threshold can be maintained in the very short term (pre-2030) in a scenario of average conditions.

• Reduction of the value chain emissions:

In November 2024, the Group set two new milestones for 2027 and 2035 for Scope 3, and revised its ambition upwards for the 2030 milestone.

2027 target	30% reduction, compared with 2019 levels, of all Scope 3 emissions by 2027
2030 target	35% reduction, compared with 2019 levels, of all Scope 3 emissions by 2030
2035 target	45% reduction, compared with 2019 levels, of all Scope 3 emissions by 2035

Scope 3 emissions (in MtCO₂e)



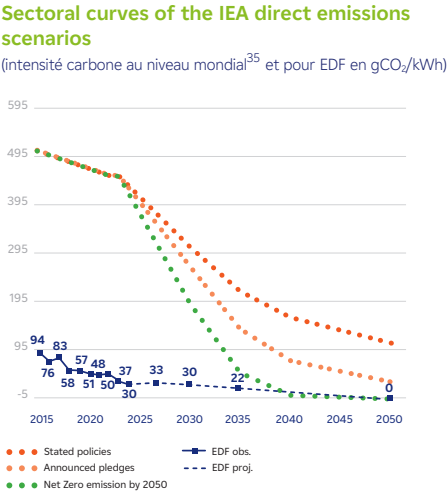
(1) Vs 2019.
(2) Over the 3 Scopes.

The indirect emissions reduction target applies to all of the Group’s Scope 3 emissions, and ensures that the Group is committed to a shortterm trajectory compatible with a warming of 1.5°C. It is based on scenarios that are compatible with the Paris Agreement. EDF is aiming for a reduction in emissions of 30% in 2027, 35% in 2030, and 45% in 2035, compared to 2019, for the whole of Scope 3. This represents an absolute reduction of around 54 MtCO₂e in 2035 compared to 2019. In 2024, the Group reduced its Scope 3 emissions by 39% compared to 2019.

32 2023 data, EU-27, European Environment Agency, Greenhouse gas emission intensity of electricity generation in Europe, October 2024.
33 2023 data, International Energy Agency, World Energy Outlook 2024.

• Labelling of the Group's emissions trajectory

The ambition level of the Group's emissions reduction targets presented in the previous paragraphs has been assessed by Moody's as being compatible with a 1.5°C warming scenario³⁴. Since the validation of this trajectory in early 2024, the Group's Scope 3 ambition has been raised. Like SBTi, Moody's relies on the sector curves of the IEA scenarios (see the graph for the world scope). The comparison with EDF's trajectory shows that the Group's cumulative emissions intensity are well below the IEA's Net Zero scenario, and that its short-, medium- and long-term objectives are compatible with such a scenario.



The STEPS, APS and NZE scenarios are the three global scenarios considered by the IEA in the World Energy Outlook 2024.
The STEPS (Stated Policies) scenario is the trend scenario, leading to global warming of 2.4°C in 2100.
The APS (Announced Pledges) scenario corresponds to the implementation of all the climate commitments made by countries, leading to an estimated warming of 1.7°C.
The NZE (Net Zero Emission) scenario is the most ambitious scenario, limiting warming to 1.6°C around 2040 before returning to 1.4°C in 2100.

In addition, the trajectory for reducing the EDF group's carbon footprint, all greenhouse gas emission scopes combined, is consistent with the ambition to keep global warming at 1.5°C and with the emission reduction rates envisaged in the Net Zero Emissions scenario of the IEA (IEA WEO 2024 data).

Emission reduction targets vs. 2017	2030	2035	2050
EDF group (all Scopes)	-42%	-53%	-90%
IEA APS (Well Below 2°C)	-10%	-31%	-68%
IEA NZE (1.5°C)	-29%	-63%	-98%

2.3.3.3 Climate change adaptation

The current climate disruption is unprecedented on such a short time scale. The planet's average temperature has already increased by nearly 1.2°C since 1750. This warming goes hand in hand with a rise in sea levels and an increase in the frequency and severity of natural disasters, which can vary depending on the regions of the world. It contributes to the erosion of biodiversity on a global scale. Climate risk is already a tangible reality, the effects of which will increase in the coming years.

EDF's facilities have a technical lifespan potentially easily exceeding 40 years, making it, among non-state entities, one of the major firms most exposed to the physical effects of climate change. As a result, climate risk has been recognised as a priority risk at the level of the EDF group since 2018, after investing resources in understanding risks and potential impacts since the 1990s and the first IPCC reports.

Adapting to climate change refers to a procedure to adjust to the current climate, its changes, and its consequences. This means mitigating the harmful effects of climate change and making the most of any beneficial effects and resulting opportunities.

Target and indicator related to climate change adaptation

EDF has set the target of updating all the adaptation plans of its entities every two years at least. This indicator reflects the structuring, prioritisation and industrialisation of the actions undertaken as close as possible to the Group entities exposed to the physical risks of climate change, in compliance with the requirements of the TCFD. Depending on the entities concerned³⁶, it is a question of producing an adaptation plan using a qualitative and/or quantitative approach, integrated into the environmental management system. The updating of these adaptation plans is necessary in a context of permanent evolution of the state of knowledge in terms of climate projections, the evolution of the EDF group's maturity on the subject, and changes in the regulatory requirements in terms of adaptation. The target is 100% in 2025.

Target	Reference	Review	Scope	Performance
Percentage of adaptation plans updated less than two years ago	54% in 2024	Annual	Own activities and value chain	2024 54%

34 For more details, see Moody's appraisal report "Net Zero Assessment": www.moody.com/researchdocumentcontentpage.aspx?docid=IBC_1395660
35 The curves presented represent the carbon intensity of electricity and heat at the global level.
36 The scope for 2024: the Nuclear and Thermal Generation Division, EDF Hydro, the New Nuclear Build France programme, EDF PEI, EDF SEI, EDF Energy, Luminus, Edison, EDF Renewables, the Transformation and Operational Efficiency Division, Framatome, Dalkia.

The EDF group has set itself a set of commitments as part of its climate change adaptation approach:

- evaluate the impacts of climate change on future and existing activities;
- adapt existing facilities to make them less sensitive to climatic conditions and more resilient to extreme weather events;
- incorporate climate change scenarios in the design of new installations;
- adapt the Group's solutions, internal operations and know-how in light of climate change;
- take into account the ecosystemic dimension of climate change.

In particular, this policy states that entities most exposed to the physical consequences of climate change should elaborate a climate change adaptation plan and update it every five years. These plans are approved by the CSR Strategy Committee.

The EDF group welcomes the implementation of the third version of the National Climate Change Adaptation Plan (PNACC-3), built around a reference warming trajectory for adaptation to climate change (Trajectoire de réchauffement de référence pour l'adaptation au changement climatique - TRACC) corresponding to a warming of +4°C in France by 2100, i.e. +3°C worldwide compared to the pre-industrial period. Nevertheless, EDF favours the use of CMIP6 data by the internal climate unit for industrial applications.

See section 3.2.2 "ESRS E1 - Climate change" for all the Group's policies, actions and results concerning climate change, of the Group's 2024 Universal Registration Document, available on the Group's website





2.3.3.4 Preventing EDF's impacts on the air, water, soil, biodiversity and the production of waste

Biodiversity

The EDF group's CSR policy outlines the Group's commitments within its direct and indirect scope, on several themes including those related to biodiversity and ecosystems. The challenges of the EDF group's "net zero emissions" ambition are inseparable from an approach to promote biodiversity. To limit its environmental footprint throughout the life cycle of its facilities and activities, the EDF group seeks to act responsibly with regard to the land it holds or holds under concession. In this context, the Group's entities endeavour to limit the artificialisation and sealing of soils, to optimise and enhance the value of the land in accordance with regulations, in particular through the implementation of innovative solutions to promote multiple uses of land. In addition, the Group ensures the sustainability of its biomass supplies, for which it is committed to increasing the proportion of wood from PEFC- or FSC-certified forests. In particular, EDF ensures that no forest, directly or indirectly, will disappear for its energy needs.

In 2023, the Group renewed its commitment to two voluntary schemes: "Entreprises engagées pour la nature", under the aegis of the French Biodiversity

Office (*Office français de la biodiversité – OFB*), and "act4nature international", under the aegis of the association *Entreprises pour l'Environnement (EPE)*, with the following objectives:

- reduce the contribution of its activities to the major pressure factors on land, water and ocean biodiversity, throughout the value chain by selecting appropriate supplies, optimising end-of-life equipment, and supporting customers towards energy sufficiency;
- recreate spaces and conditions conducive to biodiversity;
- enhance biodiversity knowledge and share insights;
- transform our processes, our organisation and our skills.

The Group's commitments and actions were recognised in October 2024 as meeting the criteria of the "It's Now for Nature" initiative, as part of the campaign launched by Business for Nature on the occasion of COP16. Currently, the policy on sustainable practices regarding oceans and seas is not distinct from the policies regarding other ecosystems.

Reducing the activities' contribution to major pressure factors on biodiversity

Actions on projects under construction

The Group applies the principles of the mitigation hierarchy³⁷, or the regulations of the country where it is located if these are more stringent (notably in Europe). The Group's companies apply the mitigation hierarchy for all projects and facilities in operation³⁸. 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).

In order to limit the change in land use, the Group optimises its footprint and positions new industrial developments preferentially on sites that are already artificial.

EDF thus recycles its artificial land for the development of production infrastructures:

- by the installation of new generation units on former thermal sites: for the past 15 years, all new combustion turbines installed in France by EDF have been installed on recycled land, and solar power facilities have been installed on various former thermal power plant sites such as Aramon (6.3 ha), Artix (4.4 ha), Ambès (10.3 ha) and Ottmarsheim (15.1 ha). Additional solar power facilities are planned, particularly in Porcheville and Loire-sur-Rhône. Furthermore, if new low-carbon

thermal generation facilities are needed to balance the electricity system, they will preferably be situated on land that is mostly already artificial (recycling of the land of former thermal power plants);

- by increasing the generation capacity of its existing facilities (repowering on hydropower or wind facilities, for example);
- by extending the operating lifespan of its generation facilities, in particular by continuing to operate the existing French nuclear fleet beyond 60 years, in complete safety and performance.

EDF is also developing generation capacities that favour the co-use of the same land by several activities, in particular with agriculture for onshore wind farms and fishing for offshore farms, and mainly thanks to agrivoltaics for solar power generation. In France, with the introduction of regulations in 2024 that frame the conditions for the implementation of agri-compatible agrivoltaic and photovoltaic projects, the EDF group has dedicated part of its R&D, development and construction activities to these facility categories, allowing the co-use of crops such as vines, arboriculture or livestock.

In addition, major new infrastructure projects under construction were subject to impact assessments and implemented avoidance, reduction and possibly compensation measures.

37 Principles based on Performance Standard 6 of the International Finance Corporation (IFC, a World Bank organisation) dedicated to biodiversity conservation and sustainable management of living natural resources.

38 The French biodiversity law of 2016 requires companies to implement offsetting measures designed to avoid a net loss, and, preferably, even make a net gain in biodiversity



Actions during the operating phase on freshwater environments (hydropower)

Fish farming continuity: To ensure the continuity of fish farming (modified by the construction of dams), the hydropower operators have committed to, from the design stage of certain facilities, install “fish-passage” type systems such as on the Rhine. This adapted layout approach has gradually become embedded in the design and upgrading of facilities. Since the 1980s, EDF has implemented over 250 schemes in France to facilitate fish migration on sites with ecological implications (mainly on listed waterways). These include dam crossing facilities (such as “fish passes”), dismantling of trapping/transportation river weirs and targeted turbine shutdowns.

In the French overseas territories, no facility is affected by the classifications that end downstream of the facilities.

In Belgium, within Luminus, the Life4Fish project, aimed at reconciling the production of renewable energy and the preservation of migratory fish in the Meuse, ended in 2023 after successfully implementing its planned actions. Concerning the two reference species, the results were in line with expectations: the maximum mortality threshold of 20% was respected for eels, with a rate of 12.7%, while the impact on salmon smolts was reduced by half.

Flows: The activities of the hydropower sector can also modify the hydrological regimes. EDF monitors the generation losses associated with increases in the flow reserved for biodiversity. In 2024, the flow rate reserved for the Mollières water intake (Valabres hydropower plant, Alpes-Maritimes) represented a production loss of 894MWh.

Low-flow support during drought: Thanks to its ability to forecast and coordinate water management, EDF Hydro is a key player in optimising the water resources available in the reservoirs that it operates. In this context, EDF Hydro provides a significant volume of low-flow support that helps preserve freshwater aquatic environments. This support is one of the actions covered by the Group’s act4nature commitment for the 2023-2025 period.

Actions during the operational phase in terrestrial environments (networks, wind power, biomass)

Avifauna collisions and electrocution: Taking biodiversity into account is a major issue for the network operator Enedis: half of the electricity distribution network is overhead and presents a risk of large-scale bird mortality due to collisions with the lines or electrocution. The construction of new underground power lines helps to address the challenge of preserving bird life. On the remaining overhead lines, in partnership with nature associations, Enedis is gradually and in a targeted manner implementing corrective actions such as the installation of beacons to avoid bird collisions or

insulating equipment to avoid bird electrocution. These actions are managed by the National Avifauna Committee (Comité national avifaune – CNA), which brings together Enedis, RTE, the French League for the Protection of Birds (Ligue pour la protection des oiseaux - LPO) and France Nature Environnement.

In order to limit the impacts of wind farms on flying fauna, measures to mitigate and monitor the impacts are implemented during the construction phase and during operation, such as maintenance of the surroundings of the wind turbines to limit their attractiveness. In wind farms with proven risks of collisions, measures to reduce bird and bat mortality are included:

- bats: the most common method is shut down-on-demand, which consists of stopping the wind turbines when the weather conditions are the most favourable to bat activity at altitude;
- birds: it is possible to install detection-reaction systems in wind farms that emit sound signals in order to frighten away birds when they approach the rotor or that stop the turbines in real time.

Research focuses on the interaction of bird life with wind farms and the factors influencing it both at sea and on land. Thus, the thesis, developed as part of the EDF Renewables R&D programme, entitled “Deep learning simulation of seabird behaviour: evaluating the impact of offshore wind farms”, seeks via neural networks to have a model of the risk of collisions.

Bat collisions: Nearly two thirds of the wind turbine fleet operated by EDF Renewables in France is subject to bat-related regulations: the wind turbines are stopped when the conditions for the presence of bats in the immediate vicinity of the turbines are met. The control plans put in place vary according to the parameters specific to each site and enable a significant reduction in collisions. Specific monitoring carried out during the first years of operation makes it possible to optimise these plans.

Procurement of sustainable biomass: The procurement of biomass for electricity and heat generation can have a significant impact on ecosystems. Dalkia, an EDF group company, supplies the main biomass boilers operated by EDF in France through its subsidiary Bois Energie France (BEF), representing an annual volume of 2.4 million tonnes of wood in 2024. Dalkia has voluntarily committed to increasing the share of wood from PEFC- or FSC-certified forests. This indicator highlights the sustainability of the product throughout the chain from the producer (forest owner, farmer, etc., committed to a sustainability approach) to the recycler (who recycles waste and residues for energy recovery) until final use. Dalkia has set the target of having more than 30% PEFC wood by 2026 and beyond, knowing that the volume of BEF’s supply is expected to double with regard to decarbonisation projects in industry and greening of heating networks.

Target of preservation and restoration of natural areas

In line with the third pillar of its voluntary commitments, relating to the recreation of spaces and conditions favourable to biodiversity, the EDF group has committed to voluntarily preserving and restoring 12 sites between 2023 and 2025 (see act4nature international commitments). The 2025 target was set without being based on ecological thresholds. This target is linked to the material positive impact of improving ecosystems. This target is voluntary, unrelated to regulatory offsetting. The restoration operations are carried out with external partners (particularly associations).

Sustainability issue	Target	Reference	Review	Périmètre	2024
Impact on ecosystems	Preserve and restore on a voluntary basis 12 sites between 2023 and 2025 (see act4nature international commitments)	2023	Annual	EDF SA	6 sites

See all the Group's biodiversity policies, actions and results in section 3.2.5 "ESRS E4 - Biodiversity and ecosystems" of the Group's 2024 Universal Registration Document, available on the Group's website

Water resources

As a responsible user and a major player in the management of water resources, the EDF group is committed to helping preserve water resources in order to enhance environmental resilience and satisfy uses in a concerted and sustainable manner, in line with its CSR policy, implemented by the CSR Strategy Committee. In relation to the identified IROs, this commitment is reflected in the following main areas:

- the EDF group optimises its use of water resources in terms of quantity and quality on its sites and in its value chain;

- the EDF group is committed to the resilience of the territories where it operates through transparent and responsible management of water and its facilities, as well as contributing positively to the "large" water cycle;
- the EDF group is actively involved in the water governance at the river basin scale, in the search for compromises in the water management;
- the EDF group is developing the skills, know-how and partnerships necessary to achieve these objectives, while raising awareness of these issues among its employees.

It should be noted that this policy is subject to a regulatory framework on quantitative water management:

- some of the nuclear facilities using semi-closed cooling circuits, where part of the water evaporates, are legally required to guarantee a minimum downstream flow of the site (reserved flow). This may involve reducing the volumes of water consumed during low-water periods by lowering electricity generation or offsetting the deficit by releasing water from upstream dams. These low-water support rules supplement the rules on thermal and chemical discharges;
- similarly, hydropower facilities continuously deliver a minimum flow, within the limits of the natural incoming flows, to the natural river course between the water intake and the return downstream of the facility, ensuring favourable hydrobiological conditions.

These operating limits ensure that the quantitative impact on water resources is controlled: if river flows are too low, electricity generation is limited or even stopped. The same applies to the other industrial activities.

The Group carries out **water stress analyses** of its thermal and nuclear electricity generation sites and its industrial sites to identify those that require particular vigilance regarding water sobriety. This is taken into account through the facilities operating rules regarding hydrological conditions relating to withdrawals (regulated by drought decrees), and in the technological choices made during the facility design to reduce pressure on water resources.

In addition, for new facilities planned to be located in areas exposed to high water stress, the Group undertakes to direct the technological choices from the design phase towards low-water solutions to limit the pressure on the water supply. Furthermore, for any new project presented to the Commitments Subcommittee of the Group Executive Committee, the assessment of water stress is one of the criteria used to assess the water-related aspects of a project.

These commitments align with the various international and national frameworks related to water resources issues, including:

- the Sustainable Development Goals (SDGs) defined by the United Nations in 2015 (one of the 17 SDGs covers water: "guarantee access to water and sanitation for all and ensure sustainable management of water resources");
- the Water Framework Directive (WFD) established by the European Union in 2000 with the aim of restoring good water quality by 2027 and organising water management by major catchment areas;
- the legislative provisions codified in the French Environment Code relating to water and aquatic and marine environments (Articles L. 210-1 and following of the French Environment Code);
- the action plan for resilient and concerted water management launched by the French government in 2023, aimed at organising water sobriety and resource sharing.

Water withdrawal and consumption

The Group has initiated several key actions to better manage its sustainability challenges related to water resources across all its entities that consume water for cooling and withdraw water for industrial processes. These initiatives aim to reduce water usage to limit the pressure on the resource.

This applies to all Group sites, with particular attention paid to sites located in areas of high-water stress.

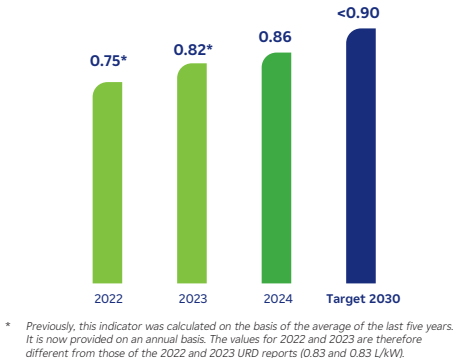
In France, the Group has defined water management plans for its main entities that use freshwater (nuclear and thermal generation fleet, Framatome and Dalkia) in order to: better characterise water uses; reduce withdrawals and consumption; preserve water quality and the environment; develop innovative processes.

In addition, to promote synergies between the units and the sharing of experiences and best practices, the Group initiated a working group on water sobriety across all its entities in 2024. This covers both the use of water for its own operations and activities at the upstream end of the value chain.

Water consumption of the cooling circuits of electricity generation sites

This voluntary target on the water intensity in kWh of the electricity generation ensures that the Group limits its water consumption per unit of electricity generated. This is the specific consumption of water evaporated per kilowatt-hour of electricity generated (in L/kWh). The Group's objective for this indicator is to not exceed the threshold of 0.90 L/kWh. Given the expected evolution of the electricity generation facilities (increase in the share of renewable energies and seaside nuclear generation), the water intensity at Group level is expected to decrease in the coming years. The threshold used has been reduced by 0.05 L/kWh compared to the threshold of 0.95 L/kWh that the Group set for itself in 2016. In 2024, the indicator stood at 0.86 L/kWh. It should be noted that this figure, while being below the threshold, is slightly higher compared to 2022 and 2023 due to the increase in nuclear power generation.

Water intensity per kWh (in L/kWh)



Water consumption of the cooling circuits of electricity generation sites

In order to ensure that the Group's material sustainability issues in terms of water consumption in the cooling circuits of electricity generation sites are effectively addressed, the following monitoring is in place:

Target	Reference	Review	Scope	2024
Water intensity in kWh of the electricity generation: remain below the threshold of 0.9 L/kWh	2016	Annual	Group	0.86 L/kWh

This voluntary target on the water intensity in kWh of the electricity generation ensures that the Group limits its water consumption per unit of electricity generated. This is the specific consumption of water evaporated per kilowatt-hour of electricity generated (in L/kWh). The Group's objective for this indicator is to not exceed the threshold of 0.90 L/kWh. Given the expected evolution of the electricity generation facilities (increase in the share of renewable

energies and seaside nuclear generation), the water intensity at Group level is expected to decrease in the coming years. The threshold used has been reduced by 0.05 L/kWh compared to the threshold of 0.95 L/kWh that the Group set for itself in 2016. In 2024, the indicator stood at 0.86 L/kWh. It should be noted that this figure, while being below the threshold, is slightly higher compared to 2022 and 2023 due to the increase in nuclear power generation.

Sharing of water resources

EDF constantly ensures that its hydropower facilities are managed in consultation with stakeholders (the French government, local governments, water agencies, associations, etc.).

In France, the EDF group participates in national and local water governing and management bodies (national water committee, water catchment area committees, local water commissions, etc.), and is represented by the French Electricity Union³⁹ in water management meetings.

Since 2003, EDF set up an internal water coordination body in France whose operational management is entrusted to EDF Hydro's management. Its mission is to organise cross-functional monitoring and sharing of information on water issues between the energy-producing entities in mainland France and to promote synergies in the operational management of water. This coordination enables the Group to guarantee optimal operation of all electricity generation facilities in France by integrating the multiple operating factors in connection with water resources and electricity generation facilities: water level monitoring and guarantee of low-flow support for dams, anticipation of changes in water temperatures and river flows at thermal and nuclear power plants, organisation of water releases.

In order to strengthen this key role in multi-use water management for other water users and enable external stakeholders to benefit from the technical and strategic skills thus developed, the EDF group has undertaken several key actions to improve the management of these sustainability issues and opportunities:

- **renewal of low-flow support agreements:** EDF Hydro supports low-water flows from many of the reservoirs that it operates, thus preserving aquatic environments and securing downstream water uses (including, for example, drinking water supply or irrigation). In a context of climate change, EDF Hydro is committed to periodically renewing the low-water support agreements with catchment area stakeholders, with in some cases an increase in the low-water support volumes. For example, in

2024, EDF Hydro signed an agreement with three French départements (Lozère, Ardèche, Haute Loire) concerning the contribution of the Montpezat facility to support the low flows in the Ardèche, Chassezac-Loire and Loire rivers. As part of the agreement, studies will be carried out to optimise both the low-flow support and the energy generation of the hydropower facilities while integrating climate change forecasts;

- **STEP projects:** the EDF group is working on projects to design new pumped-storage plants (Station de transfert d'énergie par pompage – STEP) in France that will increase flexibility in energy generation and therefore free up low-water support capacity in other facilities, while preserving water resources (in fact, STEPs operate in a “closed circuit” since the water is reused between two upstream and downstream reservoirs). The third multi-year energy programme (Programmation pluriannuelle de l'énergie – PPE) consultation project provides for the development of STEP facilities with a potential of 1.5GW identified for commissioning between 2030 and 2035. A first project is already well advanced, the Vouglans-Saut-Mortier project (located in the Jura region). Its objective is to increase the volumes of water stored by reusing the existing facilities. In addition to increasing the generation capacity of low carbon electricity, this project will be beneficial for the natural environment and other water uses (low-flow support flows, cooling of downstream aquatic environments in the summer period, tourist activity);

- **technical skills in water resource modelling:** the EDF group has developed recognised expertise in water resource forecasting in France, which relies in particular on a network of hydrometeorological measurement stations located in all water catchment areas in which EDF operates. In addition to the internal contributions (flood management, anticipation of low levels and filling of dams, etc.), these skills are also valued externally, for example:

> providing modelling tools and technical support to certain stakeholders involved in the operational management of water resources;

> contribution to collaborative scientific projects, for example with participation in the Explore 2 project in 2024⁴⁰;

> the development of a digital twin of the Loire water catchment area, in order to model changes in natural water resources and water uses according to different climate change scenarios. This work is intended to be consolidated in partnership with scientific organisations and shared with water stakeholders.

Target and indicator relating to the multi-use management of water resources

Related indicators	Target	Reference	Review	Scope	2022	2023	2024
Meeting demand to support low-water levels	100%	-	Annual	EDF Hydro	100%	100%	100%

- See all the Group's policies, actions and results in terms of water resources in section 3.2.4 “ESRS E3 - Water resources” of the Group's 2024 Universal Registration Document, available on the Group's website

This target concerns the hydropower fleet in mainland France managed by EDF Hydro. It aims to meet the demand for low-water flow support within the limits of the contractual arrangements. In 2024, the contractual provisions for low-water support in France were met. This voluntary management of multiple water uses has led EDF to deliver an average of more than 465Mm³ per year over the last 10 years. This is a voluntary target, specific to EDF, included in the Act4nature commitments (2023- 2025).

40 This project is led by the French National Research Institute for Agriculture, Food and Environment (Institut national de recherche pour l'agriculture, l'alimentation et l'environnement – INRAE) and the International Office for Water (OIEau) and aims to update the knowledge on the impact of climate change on hydrology in France, based on the latest IPCC publications: <https://professionnels.ofb.fr/fr/node/1244>



Soil pollution

The EDF group does not make any recurring discharges into the soil, which are therefore not subject to any regulatory declaration. Monitoring is conducted to verify compliance. However, some sites may have been impacted by substances from operations in the past and the EDF group, as a responsible operator, is working on their remediation. In addition, phytosanitary-type chemicals may be used at the facilities. EDF therefore pays particular attention to limiting the use of such products or replacing them.

See all the Group's policies, actions and results on soil pollution in section 3.2.3.3 "Soil pollution" of the Group's 2024 Universal Registration Document, available on the Group's website

Waste

The Group's entities and companies are committed to a process of continuous improvement according to the principle that the "best waste" is waste that is not produced. The issue of waste is integrated into the environmental management system at the level of the Group's business lines and subsidiaries.

At the level of EDF SA, the "Waste and circular economy" group, which brings together the waste correspondents of the business lines, is tasked with carrying out actions for prevention, optimisation of resources, and reuse in order to limit the production of waste, as well as for promoting the sharing of feedback on prevention and recovery methods and best practices. A multi-year roadmap drawn up by EDF SA makes it possible to structure the actions

redeployed by the entities and monitored through quarterly meetings and associated indicators (quantity of waste recovered, quantity of equipment reused, monitoring of a waste recycling rate to encourage recycling, and thus resource savings).

Radioactive materials and waste

The management of radioactive waste is subject to a strict regulatory framework under the control of the French Nuclear Safety and Radiation Protection Authority (*Autorité de sûreté nucléaire et de la radioprotection* - *ASN*) in France and under the supervision of the Office for Nuclear Regulation in the United Kingdom.

It should be noted that 95% of the volume of radioactive waste produced by EDF is "short-lived" waste (period less than or equal to 31 years). It mainly comes from filtration systems, and maintenance and servicing operations. Most of the radioactive waste from plant decommissioning works is also short-lived waste.

Recycling of recoverable materials

• Recycling of used fuel

EDF's control of each stage of the fuel cycle, the design of high-efficiency fuel and suitable management of that fuel within nuclear units all contribute to optimising natural uranium needs. The recycling of used fuel currently saves around 10% of natural uranium mainly through the use of MOX fuel for a cycle at equilibrium and up to 25% when the uranium reprocessing process is fully operational.

The treatment of used fuel (separation of uranium, plutonium and fission products, vitrification of fission products and compacting of metal structures) enables the reduction of the volume of radioactive waste by a factor of four to five and its radiotoxicity by a factor of ten.

• Recycling of VLLW metal materials

The Technocentre is a planned industrial facility for the processing and recycling of very low-level (VLLW) metals from nuclear facilities. It is planned to be built in Fessenheim.

The objective is the production, after melting, of ingots in the conventional field, whose radiological characteristics guarantee a use without impact on health and the environment whatever the use.

Since 14 February 2022, the legal framework opens up the possibility of recovering VLLW metals.

The project will thus save natural resources in a circular economy approach, reduce the CO2 emissions (60% reduction compared to steel production by mining), and reduce the need for storage capacity at CIRES (Andra storage facility dedicated to VLLW).

The French sources of recyclable metal, mainly from the decommissioning of facilities, amount to 500,000 tonnes held mainly by EDF (approximately 200,000 tonnes, including steam generators) and Orano (approximately 200,000 tonnes, including diffusers at the Georges Besse 1 plant). The project also aims to recover some of the foreign sources of recyclable metal. The commissioning of the installation is scheduled for 2031. The preliminary

public debate was held from 10 October 2024 to 7 February 2025.


• Treatment of radioactive large component waste

Thanks to the long-standing know-how of the EDF group and the establishment of a European industrial platform for radioactive waste treatment plants, the teams of Cyclife, a EDF wholly-owned subsidiary, have been meeting the Group's challenges since 2016, as well those of international customers in their projects to reduce the volume of their radioactive waste and to optimise their operating costs, in particular for dismantling operations. Whenever possible, Cyclife offers its customers materials recycling to promote a responsible and sustainable nuclear industry. Cyclife meets the growing need to preserve the waste disposal and final storage capacity of nuclear power plants, by reducing their volume and, if possible, by recycling the treated materials. Over the years, the Cyclife group has developed a range of services using the best channels for each category of waste. Cyclife operates three waste treatment facilities in France, the United Kingdom and Sweden. Each of them offers specific radioactive waste incineration and melting capacities. EDF or external customers can access the facility offering the best technical, economic and regulatory solution for the waste to be treated. Cyclife also provides engineering services to design waste treatment infrastructures and innovative on- and off-site treatment/packaging protocols. In 2024, the upper parts of the steam generators at the Fessenheim power plant were processed in the Swedish plant, allowing for the recovery of 600 tonnes of metal. The recycled ingots

were resold in Sweden to steelmakers. In France, the Cyclife France plant allows the incineration and melting of waste from facilities in operation or dismantling, thus allowing a significant reduction in volume before storage.

• Final radioactive waste

Radioactive waste is classified into different categories depending on its nature, its level of radioactivity and the lifespan of its radionuclide components: high-level waste (HLW), intermediate-level waste (ILW), low-level waste (LLW) and very low-level waste (VLLW). It is called long-lived (LL) when it remains active for more than 31 years.

 See all the Group's policies, actions and results concerning waste management in section 1.4.1.1.2.3 "The challenges of nucléaire operations", paragraph "Storage of conditioned final radioactive waste" of the Group's 2024 Universal Registration Document, available on the Group's website

Conventional waste

Reuse

The EDF group has set up numerous projects, during which the use of recycled materials is encouraged (aggregates, excavated soil, concrete, steel, etc.) and the deposited materials are reused or recovered, in compliance with the standards in force. They make available a large number of equipment items and spare parts that remain usable.

Among these projects, EDF Reutiliz is the EDF group's reuse platform (excluding regulated subsidiaries). It gives a second life to equipment that some Group entities no longer use but that can benefit others. It is intended for Group entities but also for companies, local authorities and associations that can benefit from EDF equipment at competitive prices or free of charge. This reuse approach thus contributes to the preservation of resources, the reduction of waste and the reduction of EDF's GHG emissions (Scope 3), as well as to the reduction of emissions from its stakeholders reusing EDF equipment. It is also a solidarity-based approach that contributes to making donations to associations and schools.

Since 2020, as part of the preparation phase for the dismantling of the Fessenheim nuclear power plant, a local organisation dedicated to reuse has given a second life to more than 7,400 items of industrial and tertiary equipment, representing more than 396 tonnes of equipment reused by other EDF group units, associations, schools and companies.

These projects concern the Group's business lines in connection with energy production and operation but also external stakeholders such as companies, local authorities and associations.

In 2024, reuse via EDF Reutiliz avoided the emission of 9,003 tonnes of CO₂ equivalents for EDF and its stakeholders, with 471 tonnes of equipment reused and 5,010 tonnes since 2021.

In 2021, Enedis also set up a digital platform that enabled tracking the reuse of 488 tonnes of equipment in 2024.

Recovery

The waste recycling policy has several aspects, as described in the policy section. Significant initiatives for businesses related to renewable energies and thermal generation concern, for example, wind turbine blades and ash management:

• Wind turbine blades

Composed mainly of concrete, steel, aluminium, special chemical elements used in the composition of permanent magnets, the structure of a wind turbine is easily 90% recyclable. Including concrete foundations, this figure reaches 95 to 98%.

Solutions for recycling or reuse of blades, although not structured on an industrial scale, are being developed for the sector: recovery and transformation into aggregates for integration into concrete, cement or resin (then transformation into insulation panels, etc.), transformation into street furniture (example of the dismantling of the EDF Renewables fleet at Tenesa in Corsica). For all the wind farms under its management, EDF Renewables is committed to reuse, recycle or recover wind turbine blades when they are no longer in use to prevent them from being sent to landfills. Unveiled by Siemens Gamesa in 2021, a new model of recyclable blades will be used by EDF Renewables on 10 wind turbines at the Calvados offshore wind farm. This marks a first in France. Made from a combination of materials cast together with resin, this new blade model allows the resin to be effectively separated from the other components at the end of the blade's life so that the materials can

be reused in a wide range of applications (automotive, aeronautics, railways, etc.).

• Ashes recovered in technical processes

Resulting from the combustion of coal to generate electricity, coal ashes have properties that enable them to be used in various applications (in particular cement and concrete). As part of a continuous improvement approach, EDF has undertaken research to improve the recovery of ash, sediment and sludge in particular through the scientific work of the RECORD association, a network dedicated to the development of the circular economy and a national player in applied research in the field of the efficient use of resources and waste, with the collaboration of the Group's R&D.

Decommissioning of nuclear and thermal power plants

The Decommissioning and Waste Projects Division of EDF is responsible for the dismantling of reactors that have been permanently shut down and for the management of all waste, whether from operation or dismantling.

There are currently 11 reactors being dismantled: 9 so-called “generation 1” reactors and the 2 Fessenheim reactors shut down in 2020.

From 25 March to 30 April 2024, the public inquiry was held on the request for authorisation to dismantle the Fessenheim plant. After 37 days of public consultation, more than 200 contributions and very favourable comments (nearly 80% positive contributions from the public), EDF received the conclusions of the commission of inquiry: an unqualified favourable opinion.

To carry out some of these operations, the Group relies on the teams of Cyclife, an EDF wholly-owned subsidiary, which offers innovative tools and processes (remote operation, robots) adapted to the various reactor technologies to be dismantled. This know-how, combined with unique industrial resources for the treatment of waste from these operations, enables the development of combined dismantling and waste handling solutions, and thus optimises, through the minimisation of onsite cutting, the use of centralised facilities, schedules, costs, and the volumes of waste produced. These services are also provided internationally.

Regarding the decommissioning of thermal power plants, the Group implements various methods and engineering studies to limit decommissioning waste, on the one hand, and to ensure its optimal recovery, on the other: reuse of equipment (see EDF Reutiliz), reuse of materials on site at the end of the project, material recycling of all waste for which there is a channel, reduction of the production of hazardous waste. The sale of scrap metal represents a significant economic gain.



See all the Group's policies, actions and results concerning the use of resources in section 3.2.6 “ESRS E5 - Resource use and circular economy” of the Group's 2024 Universal Registration Document, available on the Group's website



2.4 Health and Safety

2.4.1 Identifying salient risks

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

The salient risks to the health and safety of employees and contractors relate to the operation of industrial facilities. Risks concerning consumers and local residents relate to the operation of industrial facilities.

2.4.2 Monitoring indicators



41 Lost Time Incident Rate (LTIR): the Group's overall LTIR represents the number of accidents occurring in the course of work (for employees and contractors, regardless of the level of subcontracting, including co-contracting and temporary workers) that resulted in one or more days off work and happened over a period of 12 months, per million hours worked. It is calculated by multiplying the number of work-related accidents involving lost time by one million, then dividing by the number of hours worked by employees.

42 See appendix "Risks to which the Group is exposed" p.75

Identifying health and safety salient risks

Risk category	Salient risk	Risk criticality	Material negative impact	Group risk ⁴²
Health and safety of employees and contractors	Risk of work-related accidents and work-related illnesses (asbestos, chemicals, ionising radiation and noise)	■ ■	ESRS S1 Own workforce ESRS S2 Workers in the value chain	1D
	Musculoskeletal diseases and anxiety-depressive disorders, including stress	■	ESRS S1 Own workforce ESRS S2 Workers in the value chain	1D
Health and safety of local communities	Safety of nuclear and hydropower facilities	■ ■	ESRS S3 Affected communities	1F, 2C
			ESRS E2 Pollution	
	Air quality	■	ESRS E3 Water and marine resources	1I
			ESRS S3 Affected communities	
			ESRS E2 Pollution	

Net criticality of control actions: ■ ■ ■ high ■ ■ intermediate ■ moderate

2.4.3 Principal mitigation, prevention and monitoring measures implemented

2.4.3.1 Rollout of the Health and safety policy

The Group's health and safety policy was updated in April 2024.

The basis of health and safety management

The 10 life-saving rules

The Group focused its commitment on the 10 life-saving rules, identified in 2014 on the basis of an analysis of the fatal accidents that have befallen the EDF group over several decades. The update in 2024 of the prevention and health and safety policy was accompanied by a review of the key rules, the wording of which was improved to take into account feedback and strengthen their implementation in the field.



We shall all comply with the **10 EDF Life-Saving Rules** to protect us collectively from the hazards.

Dare to question and be questioned, and to be able to say **STOP** in case of danger!

ALL TOGETHER, LET'S BE THE LEADERS OF THE SHARED VIGILANCE!



I never cross a barrier, including a radiography barrier, unless I'm authorised to do so.



I never work or drive under the influence of alcohol or drugs.



I use the safety equipment (belt, hard hat, etc.). I respect the speed limits, I do not handle the phone or SatNav when driving a vehicle.



I always protect myself against falling from height and I protect others from falling objects.



I never move under a suspended load, and I keep a safe distance from it.



I only work on equipment with isolated energy sources.



I always use the specified protective equipment when working with or near live equipment.



I always keep a safe distance from moving equipment or vehicles.



I always wear a life jacket when working near water if there is no collective protection.



I never enter a confined space without authorisation, atmospheric control, and supervision.

LIFE IS PRECIOUS No emergency justifies taking risks!



The BEST reference framework

Pursuant to the new policy, the self-assessment of their health and safety management system with regard to the BEST reference framework, carried out by the Group's departments, divisions and companies is now replaced by a three-year assessment supplemented by a peer review. This change, which will take place from 2025, aims to strengthen the consistency of the assessment at Group level and to enable entities to benefit from the vision and experience of their counterparts.

ISO 45001/MASE or VCA certifications

The share of employees belonging to entities whose management system is certified (ISO 45001, MASE or VCA) was 26% in 2024 compared to 35.4% at end-2023 and end-2022, as entities increasingly rely on the Group's internal guidelines (BEST).

This figure is published on the "edf.fr" website and on those of the certified entities.

"Safety Stop"

The Group's health and safety policy specifies that when the safety conditions relating to the life-saving 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.

Moreover, a Group Safety STOP event is organised every year, for each team, in October. This year, it was held on 17 October 2024. It provided an opportunity to discuss health and safety issues in the field and in work groups, focusing on the 2024 theme of "Working together for our health and safety".

Sharing the analysis of "high potential events" (HPE)

In order to ensure the continuous improvement loop, and to maintain risk awareness, high potential events (HPE) are collected, analysed and shared at Group level; 80% of these HPEs are near misses or dangerous situations. Particular emphasis is placed on those related to the Group's 10 life-saving rules.

In 2024, a safety criterion of the EDF SA profit-sharing agreement focused on increasing the HPE/LTI ratio with a view to encouraging the collection of HPEs in the field and reducing the number of accidents with lost time.

Health and Safety audits

Audits are carried out each year across the Group, in particular in the form of site visits. These site visits are documented in a report shared locally with the audited teams.

Anxiety-depressive disorders and stress

For many years, the EDF group has been working to prevent psychosocial risks that can lead to anxiety-depressive disorders. A risk assessment method was defined at Group level. Based notably on the use of the responses to some twenty questions from the MyEDF survey, it enables the identification of the risk factors specific to each collective but also protective factors, such as recognition, work ethic, participation in setting objectives.

Furthermore, a framework contract provides external support to develop training actions and support groups in difficulty.

A training offering is provided for managers to support them in conducting return-to-work interviews at the end of each work stoppage, making it possible to welcome back employees under the best possible conditions. The systematic performance of these interviews is one of the requirements of the new health and safety prevention policy.

Lastly, a "Listening and Support" platform allows users to talk, 24 hours a day, seven days a week, in complete confidentiality, with a psychologist by telephone or via a chat in different languages. In addition, the platform can be accessed through a smartphone app providing users with awareness-raising resources and tools. This platform, which is

accessible to all Group employees in France, is also open to individuals living in the employees' households and to employee service providers.

Musculoskeletal disorders (MSDs)

The health and safety function is strengthened through recruitment, at various levels of the Company, in order to carry out workstation studies and define ways to reduce the arduous nature of activities. In addition to actions to improve workstations, a training offering is made available to employees in both technical and tertiary functions. Physiotherapists and osteopaths work in several entities. Service companies organise warm-up sessions before starting work, as is the case for one of them on the EPR2 site in Penly.

A monitoring process on innovations available on the market is carried out to identify new forms of work. Several exoskeleton applications are in place to reduce the arduous nature of activities. These physical assistance devices provide relief to the upper limbs of the human body. They are, for example, used by jobs involving arm-intensive work tasks, in restrictive positions, with tools to be carried at arm's length. This is the case, for example, for grinding operations in the air at a nuclear site in France. In hydropower generation, the use of exoskeletons reduces the risk of injury during water intake screening operations, facilitating the use of rakes.

Radiation protection

The mobilisation of the various stakeholders is enabling the Group to continue the drive for improvement in the field of radiation protection and dosimetry (training and education of employees and management, increased monitoring of the cleanliness of installations, improvements to the equipment available to operators, optimisation of the installation of lead screens, standardisation of working methods and equipment among nuclear sites, increased supervision, etc.).

As a result, for the past decade the average annual collective dose is 0.69 man-Sieverts (manSv) per reactor, down by 1% from the previous decade, whereas the average volume of hours worked has increased by 35% from one decade to the other. In 2024, the average collective dose was 0.75 manSv per reactor. The average annual individual dose (EDF employees and industrial partners) will remain below 1 mSv in 2024 (0.99 mSv). It is well below the regulatory limit of 20 millisieverts over 12 months for the whole body.

EDF is voluntarily pursuing the ALARA (As Low as Reasonably Achievable) approach to controlling collective dosimetry by continuing to reduce radiation exposures through multi-year facility sanitation programmes and by testing new technologies aimed at reducing their source.

Health and safety actions related to subcontracting

In addition to integrating safety criteria into the various stages of contracting services and taking the best safety performance into account in the technical and economic evaluation of bids received during calls for tenders, the EDF group strengthened, through its new Prevention and Health and Safety policy adopted in 2024, the partnership dimension to be developed by the entities between principals and contractors. The new policy sets out the requirement to carry out joint prevention visits among all stakeholders to share, in a very concrete way, the prevention actions to be rolled out in the field. Moreover, representatives of service providers were involved in the drafting of the new policy and the updating of the Group's 10 life-saving rules.

Regular discussions were held with the MASE association⁴³ to update the partnership charter that has linked the EDF group to this association since 2019, providing an important relay for supporting companies, particularly very small enterprises and SMEs, in developing their health and safety management.

Improving working conditions

The well-being of people is a major focus of the Group's raison d'être. Various actions are implemented to support this commitment, in particular the fight against domestic and intra-marital violence as well as support for parenthood and family caregivers. The results of the annual MyEDF survey in 2024 show that 88% of employees are satisfied with the health and safety conditions at work.

Targets and indicators for health and safety

In order to have comparable data between Group entities and measure accident rates directly related to the performance of activities, the EDF group set up a **"LTIR"** (Lost Time Injury Rate) indicator corresponding to the calculation of the frequency rate according to Anglo-Saxon standards. This indicator provides information on the overall level of safety of the employees of the Group and its partners during their professional activities. It enables management to focus on work-related accidents.

The overall LTIR objective is based on a process of continuous improvement. The selected value overall LTIR <1 in 2030 is determined on the basis of the best practices observed at the Group: EDF UK and Framatome, but also international leaders in the field of energy and the Oil & Gas sector.

Global indicator	2024 target	2030 target	Review	Scope	2024
Employee + Supplier LTIR	< 1.7	< 1	Annual	Group	1.6

43 Link to the website of the MASE association: mase-asso.fr

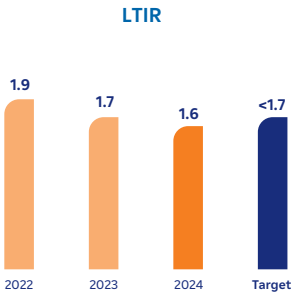
Details on the indicators

The Lost Time Incident Rate (LTIR): the Group's overall Lost Time Incident Rate represents the number of work-related accidents (employees and service providers, whatever the level of subcontracting, including co-contracting and temporary staff) with lost time of one day or more, occurring over a 12- month period, divided by one million hours worked. It is calculated by multiplying the number of work-related accidents in service leading to lost time by one million and divided by the number of hours worked by employees.

Group key performance indicator

In 2024, the overall LTIR (EDF + service providers) progressed with an increasingly significant overlap of the EDF LTIR and the service provider LTIR.

Although 2020 was an exceptional year, the Global LTIR has exhibited a steady downtrend since 2019, due to the reflecting improvements driven by the deployment of preventive measures for employees and service providers.



EDF continues to record work-related fatal accidents, making it an absolute priority to eradicate these events, in particular by strengthening the application of the Group's 10 life-saving rules covering the main business risks (electrical, lifting, working at height, road, risk, etc.)

Group indicators	2024
Rate of employees covered by the health / safety management system (as a %)	34.6%
Number of deaths due to accidents directly related to professional activities – Employees	1
Number of deaths due to work-related illnesses – Employees	2
Number of deaths due to accidents directly related to professional activities – Service providers	2

EDF SA indicators	2024
Number of recordable work-related accidents – Employees	410
Number of recordable work-related accidents – Service providers	537
Work-related accident rate – Employees	4.3
Work-related accident rate – Service providers	5.9

Details on the indicators

An accident is considered to be related to professional activities if the employee, at the time the event occurs, is under the instruction of the employer or if the occurrence is due to hazardous conditions (property, equipment or third parties) in the employer's scope of responsibility (employer site).

The percentage of employees covered by the health / safety management system (as a %) provides information on health and safety certification (MASE, ISO 45001, etc.) which contributes to control health

and safety risks by offering better protection of employees.

The number of deaths due to work-related accidents and illnesses measures the number of fatal accidents of employees directly related to their professional activities as well as illnesses as a direct consequence of the exposure of a worker to a physical, chemical or biological risk or a risk resulting from the conditions in which they carry out their professional activities.



The number of fatalities due to accidents measures the number of fatal incidents involving service providers that are directly related to their professional activities.

The latency between the occupational exposure, the appearance of the pathology and the death does not make it possible to identify the deaths due to occupational illnesses of subcontracted employees because they usually occur several years after the performance of the service.

The work-related accidents indicator shows the number and rate of work-related accidents with lost time and without lost time related to the professional activities of employees and service providers. It provides information on the workstations or sectors where accidents are most frequent (TRIR: Total Recordable Incident Rate). As accidents without lost time could not be fully accounted for by the Group, the indicator is presented for EDF SA only.



See all the Group's policies, actions and results concerning health and safety policies in section 3.3.2.6 "ESRS S1 - Health and safety for all" of the Group's 2024 Universal Registration Document, available on the Group's website

2.4.3.2 Safety of nuclear facilities and hydraulic installations

Nuclear safety

The French Nuclear Safety and Radiation Protection Authority (Autorité de sûreté nucléaire et de radioprotection - ASN) in France and the Office for Nuclear Regulation (ONR) in the United Kingdom ensure compliance with safety regulations, including for the transport of radioactive materials. An absolute priority for EDF, the safety of nuclear power plants is a concern at all times, from the design to the decommissioning of facilities, and including their operation. The "EDF group Nuclear Safety" policy was redefined in 2021. The policy deals notably with operational and cybersecurity incidents.

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, supervisory 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 report for the EDF group. A General Inspector

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

Facility design

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 engagement policy and large-scale investment programmes. The Group's nuclear safety policy is incorporated into training for both EDF group 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 WANO⁴⁴ and OSART⁴⁵), audits conducted by experts from the International Atomic Energy Agency (IAEA).

Exercises

In the event of an accident, a crisis response procedure is in place to limit the environmental and human impacts and make sure the facility is safe. It is founded on two closely coordinated plans, designed to cover the local and national level. These are:

- the internal emergency plan for each nuclear site, developed by EDF;
- the special intervention plan, prepared by French prefectures in collaboration with the French government and EDF.

For greater effectiveness, these plans take account of risks both external (flooding, etc.) and internal (fire, etc.). The adequacy of the system for warning, informing and protecting people is regularly assessed through accident simulation exercises. Each year, approximately 100 exercises are organised for the entire French nuclear fleet, i.e. around one every three days. Around ten of these are national in scope, under the direction of the ASN. They involve EDF and the public authorities, notably the prefectures. From its very first analyses following the Fukushima accident in March 2011, EDF has enhanced its crisis management procedure. It has set up a national system capable of providing rapid material and human assistance to any site experiencing a serious issue. Simulation exercises for this system, called the Nuclear Rapid Action Force (Force d'action rapide nucléaire - FARN), have been conducted from the regional bases at Civaux, Paluel, Dampierre and Bugey. The system can be deployed on a section of any site in difficulty. FARN allows parallel operations on six units on a same site.

44 World Association of Nuclear Operators

45 Operational Safety Analysis Review Team

Training

The Group's nuclear safety policy is an integral part of the training given to employees of EDF and its service providers. After an initial training course of several months – up to 24 months for key positions (safety engineer, operator, etc.) – each employee must undergo mandatory retraining. Training takes place every year, two years or three years, depending on the functions and fields of activity.

Hydraulic systems

EDF performs regular monitoring and maintenance of dams, contributing to hydropower safety. Hydropower safety consists of all the measures taken during the design and subsequent operation of hydropower facilities, to protect people and property against water-related hazards arising from the presence or operation of structures.

Hydropower safety is a major, permanent concern for EDF and involves three main activities:

- control of operational risks, i.e. risks caused by changes in water levels or water flow downstream of the facilities;
- management of the facilities during periods of exceptionally high water levels, to keep the installations and surrounding communities safe;

- measures to prevent the major risk of dam or reservoir failure, through regular monitoring and maintenance of facilities under the supervision of public authorities. In France⁴⁶, 237 class A and B dams undergo hazard assessment studies carried out every ten and fifteen years respectively. These studies consolidate an overview of the facilities and associated countermeasures, forming part of a risk mitigation procedure⁴⁷. The 67 largest dams are covered by a special administrative procedure (the Special Intervention Plan).

See all the Group's policies, actions and results concerning nuclear safety in section 1.4.1.1.2.2 "Nuclear safety, environment and radiation protection" and in section 1.4.1.3.1.3 "Hydropower safety" of the Group's 2024 Universal Registration Document, available on the Group's website

2.4.3.3 Air quality

For many years, the EDF group has carried out actions in the field of ambient air quality, which aim to monitor, control and reduce its atmospheric emissions. These actions lead the Group in particular to change its thermal generation fleet.

The existing thermal facilities, which represented around 6% of the Group's electricity generation in 2024, operate within a regulatory framework aligned with current air quality policies. This framework requires risk analysis before commissioning, compliance with thresholds, monitoring at emission points and in some cases in the environment. For new combined cycle gas facilities, the BAT on the market is adopted to obtain an expected energy efficiency of more than 60%. These more efficient facilities emit less nitrogen oxides (NOx), sulphur oxides and dust.

In some cases, thermal facilities are replaced with non-NOx- or non-SO₂- emitting technologies, as in the case of isolated systems, such as 100% renewable micro-grids in island systems. To further reduce NOx emissions in these systems, EDF applies targeted measures, on a case-by-case basis, including optimizing exhaust gas treatment and limiting operating hours for specific turbines. The two transformation actions regarding the generation fleet that will have a significant impact on the Group's emissions are:

- the conversion of thermal facilities, particularly on islands, to biofuels as a substitute for fossil fuels. This low-sulphur fuel will lead to a significant reduction in the Group's SO₂ emissions;
- the phase-out of coal by 2030 (2027 for France).

In addition to the actions carried out on its generation fleet, EDF has an R&D programme on the subject and contributes to prevention and research actions on the health impact of air pollution by being involved. For example, the Group actively participates in organisations such as the Association for the Prevention of Atmospheric Pollution (Association pour la prévention de la pollution atmosphérique - APPA) and the Interprofessional Technical Centre for the Study of Atmospheric Pollution (Centre interprofessionnel technique d'études de la pollution atmosphérique - CITEPA), and the French-Speaking Association for Health and Environment (Société francophone de santé et environnement - SFSE).

46 Mainland France and French overseas départements and regions, including wholly-owned subsidiaries

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

In 2024, the Group implemented specific measures to manage and reduce the atmospheric emissions from its facilities:

- as regards the thermal fleet in France, bioliquid tests were carried out in 2024 (Vaires combustion turbines): the results demonstrated that the use of bioliquids has a positive effect on CO2 and SO2 emissions in particular;
- in Italy, the recent Presenzano cogeneration and combined cycle power plant began operation in 2024. This plant is equipped with “H” technology

to achieve an energy efficiency of more than 60%, in accordance with the BAT on the market. In addition, this power plant also emits less nitrogen oxides (NOx) than the old facilities.

See all the Group's policies, actions and results concerning air pollution in sectionr 3.2.3.2 “Air pollution: discharges of NOx, SO₂ and dust” of the Group's 2024 Universal Registration Document, available on the Group's website

In 2024, NO_x emissions at the Group scope amounted to 28 kt, up slightly compared to 2023 (+6%). This change is linked in particular to increased production in 2024 from certain thermal generation facilities in island systems and internationally. The initiated conversion of island thermal facilities to bioliquids contributes to the reduction in SO₂ emissions, which is expected to reach 10 kt in 2024.

Target	Reference	Review	Scope
Reduction of SO ₂ emissions by 75% in 2035	2019	Annual	The Group's thermal power and heat production facilities

Review	Scope	Related indicators	2023	2024
Annual	The Group's thermal power and heat production facilities	SO ₂	11 kt	10 kt
		NO _x	26 kt	28 kt
		Dust	3 kt	3 kt



2.5 Suppliers and subcontractors

2.5.1 Identifying salient risks

The key risks relating to the duty of vigilance concerning suppliers and subcontractors are identified on the basis of a risk map covering all purchasing categories within EDF's scope. This concerns EDF's industrial, tertiary and IT purchases, excluding fuel purchases, and a portion of tertiary, IT and telecommunications purchases for certain subsidiaries. The methodology takes into account all CSR themes, by aligning itself both with the EDF group's CSR policy and the CSRD standards: carbon & climate neutrality (mitigation, adaptation), preservation of the planet's resources (pollution, water and marine resources, biodiversity, waste and the circular economy), well-being and solidarity (health and safety, human rights and solidarity-based

purchasing), and responsible regional development. It makes it possible to identify actions to be carried out with suppliers at all stages of the purchasing process (strategy, contracting and market monitoring) and ultimately to determine the level of residual risk.

This risk analysis covers 184 purchasing categories for approximately 18,000 suppliers that have a contract with EDF. More than 95% of purchases are made in France, mainly due to the division of contracts into lots, which facilitates access to the Group's contracts. Equally, 97.4% of purchases are made in the European Union (99.3% in the European Free Trade Association⁴⁸).

Risks are assessed per purchase category. The assessment and prioritisation of gross risks are based on the scope of activity of the suppliers, with regard to the risk factors identified with the experts in each CSR theme. Geographical location is also a major factor in the assessment of risk.

Major risks have been identified in the various purchasing areas, mainly relating to health and safety, pollution and waste, greenhouse gas emissions, the use of rare materials and human rights; 16% of the purchasing categories analysed

are classified as "major residual risk"; 51% are classified as "significant risk"; 34% are classified as "limited residual risk". Among the purchasing categories analysed and classified as having a major residual risk, the table below summarises the purchasing areas – by category groupings – with total invoicing of more than €50 million in 2024 (all the risks detailed below specify the main risk of Group 1E relating to supply chains, as well as the main risk of Group 1B relating to control of the nuclear fuel cycle concerning uranium).

2.5.2 Monitoring indicators

95%

of purchases are made in France

350

suppliers were surveyed through the ACESIA platform in 2024

32%

of audits performed outside France in 2024

48 European Union, Switzerland and the United Kingdom in particular.

Fields of purchase	Carbon neutrality and the climate	Preserving the planet's resources	Health and safety	Human rights	Salient risk	Negative material impact
Electricity Instrumentation and Control	■ ■	■ ■	■ ■	■ ■	<ul style="list-style-type: none"> Carbon neutrality and the climate: place of manufacture and transport. Preserving the planet's resources: end-of-life management of equipment, pollution and impact on biodiversity. Health and safety: electrical and chemical exposure, machine work. Human rights: legality of labour, forced labour and child labour, due to the international subcontracting chain for certain items of equipment. 	ESRS E1 ESRS E4 ESRS E5 ESRS S2 ESRS S3
Civil engineering, decommissioning and decontamination	■ ■	■ ■	■ ■	■ ■	<ul style="list-style-type: none"> Preserving the planet's resources: risks of soil pollution, volume and traceability of waste. Noise and visual pollution. Health and safety: use of construction site equipment and explosives, handling and heavy loads. Human rights: legality of work and working conditions on construction sites. 	ESRS E1 ESRS E2 ESRS E3 ESRS S2 ESRS S3
Heavy lifting systems	■ ■	■ ■	■	■	<ul style="list-style-type: none"> Carbon neutrality and the climate: Energy consumption for the extraction and smelting of minerals (metal, steel). Preserving the planet's resources: end-of-life management of equipment, some of which may be radioactive. 	ESRS E1 ESRS E5
Non-destructive controls/testing and maintenance in an industrial environment	■	■ ■	■ ■	■ ■	<ul style="list-style-type: none"> Preserving the planet's resources: electronic waste management. Health and safety: exposure to radiation, risk of falls, heavy loads. Psycho-social risks related to specialist contractors' mobility, the pressure of deadlines and non-standard working hours. Human rights: mineral extraction conditions in certain countries for the supply of electronic components. 	ESRS E5 ESRS S2 ESRS S3
Industrial goods and services	■ ■	■ ■	■ ■	■ ■	<ul style="list-style-type: none"> Carbon neutrality and the climate: CO₂ emissions related to the transport of equipment. Preserving the planet's resources: air, water and soil pollution during the manufacturing phase, notably concerning clothing. Manufacturing and product end-of-life waste. Health and safety: risk of falls, handling of heavy objects and exposure to chemicals. Human rights: forced labour, child labour in the areas where equipment is manufactured. 	ESRS E1 ESRS E2 ESRS E3 ESRS E4 ESRS E5 ESRS S2 ESRS S3

Fields of purchase	Carbon neutrality and the climate	Preserving the planet's resources	Health and safety	Human rights	Salient risk	Negative material impact
IT and telecom equipment	■ ■	■ ■	■	■ ■	<ul style="list-style-type: none"> Carbon neutrality and the climate: CO₂ emissions related to the manufacturing location and transport of equipment. Preserving the planet's resources: electrical and electronic waste, extraction of rare metals. Human rights: child labour at manufacturing sites, notably for small equipment such as smartphones. 	SRS E1 ESRS E5 ESRS S2 ESRS S3
IT solutions, publishing, hosting and support	■	■	■	■ ■	<ul style="list-style-type: none"> Human rights: legality of labour, risks of discrimination and harassment due to suppliers' global and offshore locations. 	ESRS S2
Work on new and existing buildings	■ ■	■ ■	■	■	<ul style="list-style-type: none"> Carbon neutrality and the climate: concrete manufacturing, transport. Preserving the planet's resources: waste production. 	ESRS E1 ESRS E5
Production line for solar panels and batteries ⁴⁹	■ ■	■ ■	■ ■	■ ■	<ul style="list-style-type: none"> Carbon neutrality and the climate: CO₂ emissions related to the manufacturing location and transport of equipment. Preserving the planet's resources: water consumption in water-stressed areas, water and soil pollution during the manufacturing and extraction phase for certain minerals. Health and safety: unsuitable working conditions, exposure to chemicals. Human rights: working conditions, forced labour, risk of discrimination in certain mineral production and extraction areas. 	ESRS E1 ESRS E2 ESRS E3 ESRS S2 ESRS S3

Net criticality of control actions: ■ ■ ■ high ■ ■ intermediate ■ moderate

49 Excluding EDF scope.

2.5.3 Principal prevention, mitigation and monitoring measures implemented

2.5.3.1 Supplier policy

The supplier policy emphasises the EDF group's commitment to maintaining a performing and lasting partnership with its suppliers. It sets out the Group's raison d'être and CSR commitments from the perspective of responsible purchasing, including especially the Group's commitments relating to human rights, relationships with SMEs and companies who employ disabled people only and structures for integration through economic activity, to local anchoring and to raising supplier awareness.

The responsible supply policy remains central to this approach, with the systematic inclusion of health/safety, environmental, social and human rights-related clauses in agreements.

“Responsible supplier relations and purchasing”

Charter EDF is one of the first signatories of the Corporate Social Responsibility Charter. The objective of this charter is to change the relationship between customers and suppliers, in order to build, within a framework of reciprocal trust, a sustainable and balanced relationship among the latter. The charter is based on commitments which include the integration of environmental and societal issues in purchasing, including human rights.

This charter is accompanied by a certification process based on the RFAR (Responsible Supplier Relations and Purchasing) label framework. Obtained for the first time in 2015 and renewed in 2024 for three years, this French label, backed by the ISO 20400 standard, acknowledges companies that maintain sustainable and balanced relationships with their suppliers and validates in particular: the Company's CSR strategy, the organisation's diligence in monitoring the effective implementation of stated CSR commitments (including human rights) and the quality of the tools for measuring and steering the responsible purchasing approach, as well as the related improvement plans.

CSR charter between EDF and its suppliers

The reciprocal commitments between EDF and its suppliers in terms of social responsibility are enshrined in the social and environmental responsibility charter, a contractual document of the trade. Updated in 2023, it refers to the Group's raison d'être and CSR commitments, and takes better account of the duty of vigilance.

Through this charter, the supplier undertakes to respect the conventions of the International Labour Organization (ILO), the principles of the United Nations Global Compact, the United Nations Guiding Principles on business and human rights (UNGP) and the Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises. It must take all necessary measures to ensure that they are applied directly and through its subcontractors, in particular in the areas of compliance with the law, employee health and safety, ethical behaviour towards customers and respect for the environment.

This charter was rolled out in 2023 across EDF and Dalkia suppliers.

This charter is available on the EDF website⁵⁰. An equivalent charter is used at Framatome.

Code of Conduct for those involved in the contracting process

The Group Purchasing Division distributes a “Code of Conduct for those involved in the contracting process”.

It sets out the simple and inescapable rules governing the Group's relations with its suppliers based on major international human rights texts (the Declaration of Human Rights, ILO conventions, etc.).

This code is available on the EDF website⁵¹.

⁵⁰ https://www.edf.fr/sites/groupe/files/2023-02/edfgroup_rse_charte-fournisseurs_2023_en.pdf

⁵¹ https://www.edf.fr/sites/default/files/contrib/groupe-edf/engagements/ethique/2021/edf_code-de-conduite_2021_vf.pdf



2.5.3.2 Responsible purchasing approach

The EDF group's responsible purchasing policy is at the heart of the Group's social and environmental responsibility practices in its supply chain. For EDF, it is structured by the Group Purchasing Division, which sets the general framework and has managed the Group's Purchasing function since April 2024 in compliance with the principle of subsidiarity of governance of the subsidiaries and the management independence of the network managers.

The Group Purchasing Division

The commitments and obligations of the Group in terms of responsible purchasing are incorporated into each stage of the purchasing process, including upstream, during the qualification of suppliers, as well as in the preparation phase of calls for tenders.

In line with the material sustainability challenges for the Group, the responsible purchasing approach includes actions aimed at managing negative impacts and material risks in relation to human rights and the health and safety of workers in EDF's value chain.

The Group's Responsible Purchasing approach is a process of continuous improvement in the relationship between the Group and its suppliers, based on four pillars:

- identifying the risks and opportunities of the purchasing categories relating to the themes of the Group's CSR policy;

- integrating CSR levers at all stages of the purchasing process (requirements, selection criteria, comparison criteria, contractual clauses or productivity partnerships);
- supporting suppliers during the contractual relationship;
- monitoring and measuring the CSR performance of purchases.

Identifying the risks and opportunities of the purchasing categories

Each entity in the purchasing function has a purchasing risk analysis that includes a CSR component. The mapping of risks specific to CSR issues analyses the risks and opportunities on the themes and associated subthemes of the Group's CSR policy.

The mapping includes a risk rating for each category of purchase or supplier, weighted according to the nature and country of origin of the good or service purchased. Risk mapping is the basis of the approach, thus making possible to determine the priority purchasing categories and suppliers requiring the implementation of measures (integration of CSR levers in purchasing), as well as supplier support and monitoring actions.

To control residual risks, the risk mapping is regularly updated by taking into account:

- the effective implementation of countermeasures;

- the results of the monitoring of priority categories and suppliers;
- regulatory monitoring and global news.

The risk mapping of each entity in the purchasing function feeds into the Group's vigilance plan, in accordance with the law on the duty of vigilance.

Specifically, the risks related to workers in the value chain are included in the CSR risk mapping of the entities in the purchasing function. Particular vigilance is set on human rights, compliance with international labour law and working conditions, housing conditions and the health and safety of workers.

Integrating CSR levers at all stages of the purchasing process

The integration of CSR levers in purchasing is the counterpart to the risks identified in the risk mapping. The levers deployed by the purchasing function take into account the nature of the activities of each Group entity, as well as the regulatory constraints of each sector (notably subject to the Public Procurement Code).

The levers can be deployed throughout the life cycle of a purchase, from the expression of needs to the end of the partnership relationship. These are shared within the Group's purchasing function:

- validation of a compliance commitment from all bidders (mandatory to participate in the call for

tenders). Bidders notably undertake to comply with requirements pursuant to the Duty of Vigilance Law: respecting human rights and the fundamental rights of individuals, guaranteeing individuals' health and safety at work, protecting the environment, and complying with social and environmental legislation applying to their business;

- the "corporate social responsibility charter for EDF and its suppliers" including compliance with international human rights standards;
- contractual clauses enabling the Group's suppliers to be assessed and audited in order to verify their compliance with EDF's commitments and, in the event of proven serious breaches, to apply penalties or contract breaches;
- CSR criteria specific to the goods and services purchased, making it possible to select or compare suppliers' offers in the context of calls for tenders;
- specifications in the concession specifications to reduce the potential social and environmental impacts of the goods and services purchased, according to the technical fields concerned;
- the implementation of "Productivity Partnerships" offering the possibility of sharing with the suppliers concerned the gains associated with an optimisation of the good or service purchased. Optimisation may concern costs, deadlines, or carbon and resource issues (circular economy and waste reduction).



Supporting suppliers during the contractual relationship

The Group's Responsible Purchasing approach includes support for suppliers before and during the contractual relationship:

- supplier qualification is an assessment system prior to contracting. The Group's entities include CSR criteria in the process;
- the assessments, a system foreseen contractually, make it possible to question suppliers about their CSR commitments and their consistency with those of the Group;
- on-site audits at suppliers' sites are intended to test the CSR commitments adopted and consist of field audits (at head office, at the supplier's production site or at an EDF site).

All the business line and project entities of the Group are responsible for supporting suppliers in their scope of activity and region.

In 2024, the Group Purchasing Division organised the second edition of the "CSR Suppliers Club", which brings together around a hundred companies from the purchasing categories facing environmental and social challenges. In this context, around 60 partners from the transport, civil engineering, steel, IT and protective equipment sectors were invited to participate in collective intelligence workshops whose objective was to define in a sectoral approach the levers meeting the challenges of decarbonisation and water footprint reduction, which are to be deployed in the Group's purchases. These workshops made it possible to discuss the

maturity of the sectors in a transparent and constructive manner and to align the players with the most relevant concrete levers to be implemented gradually. Moreover, this event also made it possible to raise awareness and discuss several CSR topics with these companies, among them human rights in purchasing activities.

Monitoring and measuring the CSR performance of purchases

In 2024, the purchasing function adopted performance indicators to manage the deployment of responsible purchasing at the Group's entities, and to assess the impact of practices on suppliers and the Group's nonfinancial results. These indicators are currently being standardised and instrumented.

In addition, the audit carried out by an external third party as part of the process to obtain the RFAR label makes it possible to compare the entity's practices with the standards of the ISO 20400 standard and to ensure the continuous improvement of the responsible purchasing approach.

Lastly, as a member of the Responsible Purchasing Observatory, EDF participates each year in the association's survey which measures the level of maturity of the practices deployed in comparison with the other members of the association.

Integration of health and safety in purchasing

The stringency of health and safety requirements is one of the essential criteria to select companies. This requirement must be reinforced at all stages of the purchase process. To do so, an approach based on the purchasing categories was developed to identify the most exposed categories (e.g. rotating machine maintenance) to take appropriate actions such as including standards in specifications, and suitability and/or admissibility criteria, and criteria in technical ratings.

This point was strengthened in 2024 by the new Health and safety prevention policy, which emphasises the partnership dimension thanks to exchanges among stakeholders during joint prevention visits on site.

Other methods applied in the Group's main subsidiaries

In 2024, the entities specialised in purchase practices came together in a single purchasing function, led by the Group Purchasing Division, with the objective to harmonise practices throughout the Group, while respecting the management independence of network operators. The integration of CSR in purchasing is a structuring dimension of the purchasing sector, which is composed of the purchasing functions of EDF, Dalkia, Luminus, EDF Energy, Hinkley Point C, Framatome, Enedis, Edison, EDF Renewables and Arabelle Solutions.

The first three areas of harmonisation within the sector are risk mapping, the share of purchasing levers (in particular concerning human rights), and

the centralization of supplier assessment and audit practices.

Among the subsidiaries with equivalent commitment methods adapted to their industrial or geographical specificities:

EDF Renewables

EDF Renewables maps CSR risks across all its strategic supplies, taking into account country risks related to suppliers' production sites, as well as any potential reputational risks.

EDF Renewables' responsible procurement is based on two pillars:

1- the supplier qualification process takes place in two stages:

- a request for the information phase, during which suppliers answer a list of questions and provide documents about their environmental and societal management, including information about human rights (policies, codes of conduct, commitments, procedures, supply chain management, and any sanctions),
- an audit phase on the production sites of the suppliers to verify that the practices adopted correspond to EDF Renewables' standards.

2- environmental and social clauses in contracts: when they enter into the agreement, providers undertake to abide by EDF Renewables environmental and societal requirements and to apply these to their own suppliers and subcontractors. Failure to fulfil these requirements may entail the repeal of the agreement.

Framatome

Framatome's Supply Chain Department integrates CSR throughout Framatome's purchasing process, from specifications and the definition of certain supplier panels, to contract drafting.

In addition to the integrity checks carried out on the basis of ethical risks of its suppliers, which enables the detection of poor CSR practices, Framatome has drawn up a CSR risk map (environment, human rights, health, safety and security) of its supplies based notably on country risk (location of suppliers) and activity risk. Based on these mappings, a control is carried out to assess the level of compliance of suppliers with the duty of vigilance using an "ACESIA" CSR documentary assessment carried out by AFNOR auditors or an equivalent assessment provided by suppliers.

Dalkia

In 2023, Dalkia overhauled its Responsible Purchasing approach by developing a CSR risk map for its purchases, including 49 purchasing segments and approximately 19,000 suppliers. Risks were analysed in all areas of CSR: environment, labour relations and working conditions, human rights, ethics and compliance. Ten purchasing categories are considered to be at risk: suppliers of work equipment, of gas, of heat pumps and refrigeration units, of mechanical and hydropower equipment and

materials, of building products, of industrial chemicals, of measurement and metering, of electrical equipment, of services for heating and cooling production equipment and of multi-technical services.

Edison

Edison implemented a qualification process based on the use of CSR criteria to be completed by suppliers and including questions on supplier sustainability objectives and the calculation of the carbon footprint.

In 2024, meetings continued on the theme of "Sustainability in the supply chain: a value shared with the country". For Edison, it involves working with the entire ecosystem of stakeholders in its supply chain (suppliers, partners, buyers and Edison employees) in sustainability issues in line with regional visions.

Furthermore, in 2024, Edison created and launched, in partnership with Altis (Università Cattolica del Sacro Cuore de Milan), the "Sustainable Procurement Academy", a platform dedicated to its suppliers to provide educational resources, tools and specialised courses on environmental, social and governance sustainability issues. The scope covers Edison's activities, including those of its suppliers.

Luminus

The Luminus purchasing platform provides for specific selection criteria, depending on the calls for tenders. These non-financial criteria may concern carbon emissions, packaging, recycling, waste management or transport.

During call for tenders procedures, Luminus requires suppliers to accept the Code of Conduct as a prerequisite for any participation. Suppliers must also submit their accident statistics; which is used in the selection process.

In the selection process for suppliers of goods and services, the Luminus Purchasing department has developed a tool to help and encourage project teams to integrate CSR selection criteria.

Furthermore, for each on-site intervention, suppliers must carry out a risk analysis in addition to that already carried out by Luminus.

EDF in the United Kingdom

In the United Kingdom, EDF employs around 11,500 people, with a supply chain of around 3,300 suppliers. All employees are required to comply with EDF's ethical guidelines (Code of Conduct and Ethics and business conduct policy). EDF has also implemented support guides to sensitize its staff to these principles and values, and provides the necessary tools to report any behaviour contrary to EDF's principles.

In the supply chain, the potential risks of slavery and human trafficking are assessed in order to identify the riskiest purchasing sectors. Suppliers are required to comply with a set of standards, including the obligation to conduct a self-assessment of their risks aligned with the 10 principles of the United Nations Global Compact. In the United Kingdom, EDF encourages its supply chain to improve their social and environmental practices. EDF also provides its suppliers with direct access to various resources, such as the Supplier's Guide to Diversity and Inclusion and the Sustainability and Ethics Supplier Requirements Manual, which are offered as part of the Supplier Relationship Management (SRM) process. Compliance with the United Nations Global Compact is verified during the supplier onboarding process. Obligations in relation to modern slavery are integrated in the upstream contracting process and suppliers are evaluated throughout the procurement cycle, from qualification to contract execution.



Moreover, contractual agreements require suppliers to adhere to applicable laws and EDF group policies. Additional checks are carried out throughout the relationship between EDF and the supplier, scaled according to the supplier's risk profile and level of criticality. Integrity checks are also carried out on main suppliers to ensure that they comply with EDF's minimum standards. Such suppliers are checked regularly, considering their level of risk and financial characteristics.

Arabelle Solutions

Obligations related to the duty of vigilance, carried out during the supplier listing process (based on the "Know Your Supplier" process), involve several checks, depending on the Scope of the supplier and the associated risks. Suppliers who, on behalf of Arabelle Solutions, deal with government bodies (such as administrative service providers), suppliers recommended by customers and suppliers in construction and public works, are examples of high-risk categories subject to additional compliance assessments before integration. All suppliers and subcontractors who provide on-site services, managed by Arabelle Solutions, are subject to an additional review, assessed according to the nature of the security risks concerned. This analysis is carried out during the pre-qualification process, by the Environment Health and Safety (EHS) department in charge of approval. Additional controls relating to human rights are also carried out as part of the qualification process. Finally, Arabelle

Solutions' General Purchasing Conditions include a specific section dealing with EHS requirements.

Supplier evaluation

The verification of EDF suppliers' compliance with CSR commitments is mainly based on documentary and on-site assessments and audits. The prioritisation of these audits, carried out by the Group Purchasing Division, is based on risk mapping.

Internal service 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 Division or Contract Management, which uses Performance Assessment Sheets.

Documentary and on-site CSR audits are systematically carried out.

Documentary audits (CSR)

These audits are completed and documented by the supplier and then systematically verified by an independent body, French standards agency AFNOR. 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.

In 2024, the Group Purchasing Division continued its CSR documentary audit campaign on human rights, specifically targeting suppliers in purchasing

categories covered by international reports on non-compliance with human rights, in the areas of work clothing) and PPE, IT equipment, intellectual services, static and rotating machinery, command control, civil engineering and real estate.

As part of a risk management approach, suppliers in categories with a major residual CSR risk were questioned (relocation, document management, handling in tertiary services).

The suppliers to be assessed are mainly selected based on the supplier risk mapping, the needs of buyers and business lines, and ongoing contracts. The categories assessed are chosen according to their risk levels, but also to ensure a total coverage of categories with major residual risk over a period of two to three years.

The assessments enable buyers and suppliers to engage in a continuous improvement approach in Corporate Social and Environmental Responsibility.

Over 2024, around 350 suppliers were surveyed through the ACESIA platform.

Pursuant to General Terms and Conditions of Purchase signed by the supplier as part of its contract with EDF, in case of an unsatisfactory assessment, an audit may be requested to verify in situ by an authorised body whether the social and environmental impacts linked to the activity of the contractor and its sub-contractors comply with the provisions of the contract and EDF's Corporate

Social Responsibility Charter. However, in case of satisfactory results, the virtuous practices of suppliers can be highlighted, as was the case in the Company's business travel management tool, by indicating establishments that have distinguished themselves positively through their practices.

On-site CSR audits ordered by the Group Purchasing Department

The scope of these audits covers all areas of CSR: environmental policies, commitments and practices, human rights (personal health and safety, child labour, forced labour, working conditions, prevention of discrimination and harassment), business ethics.

On-site supplier audits are conducted by external, independent providers. CSR audits are triggered on the basis of supplier risk mapping and feedback on contract performance conditions, capitalised by the Purchasing Category Managers with the assistance of the business line entities.

The audits aim to assess the CSR commitments adopted, and consist of on-site audits (head office, supplier's production site, or EDF construction site). CSR audits are carried out on purchasing categories where progress is expected. In 2024, almost 32% of the audits carried out were outside France (mainly in China and Morocco) and concerned mostly industrial sites, industrial supplies (PPE and work clothing), static machines and training.

Pursuant to General Terms and Conditions of Purchase signed by the supplier as part of its contract with EDF, in case of insufficient or unsatisfactory audit result, the supplier is required to implement the necessary actions to address the discrepancies noted in the report. Follow-up audits are conducted to verify the implementation of the actions. If the follow-up audits still appear to be insufficient, and in the light of all the contractual monitoring elements (insufficient evaluation sheets, inefficient action plans, letter of formal notice without response, etc.), the suspension or termination of contract is provided for in the contractual clauses.

Procurement stakeholder training

Employee training helps convey the objectives and measures implemented to deploy the responsible purchasing approach within the Group. Responsible purchasing is included in many training and awareness-raising materials:

- initial training for buyers;
- onboarding training for apprentices in the purchasing teams;

- e-learning module available to all Group employees;
- training module for participants in the Group's "Environment and Society" programme;
- virtual classroom open to all Group employees.

A role-play on responsible purchasing was created and integrated to trainings. Built on a realistic concrete case, it allows to explore all possible levers that can be used during a purchase by being aware of the necessary trade-offs among various CSR issues, the costs and the deadlines of a purchase.

More generally, the "human rights into business" e-learning module, developed with the association "*Entreprises pour les droits de l'homme*" (EDH), is accessible to all employees. In 2023, a virtual classroom was also created to train employees in human rights. These tools are used to raise employees' awareness of the concepts covered by human rights and practical applications within the Group throughout the value chain (employees, suppliers, subcontractors, local communities, etc.). The Group also offers courses organised by EDH to provide training on human rights, the duty of vigilance and international standards, as well as the assessment of impacts on human rights.

Especially for EDF Renewables, new buyers joining the Purchasing Division of EDF Renewables are sensibilized to responsible purchasing practices and to the commitments of the Purchasing Policy and the Environmental & Social (E&S) Policy.

In addition, in 2024, buyers and audit engineers were specifically trained in E&S audits. The three training sessions provided allowed to train around 40 internal auditors.

2.5.3.3 Fuels Supply

Uranium supply

EDF primarily secures its supplies through long-term contracts diversified in both origins and suppliers, in most of the main producing countries (Australia, United States, Canada, Kazakhstan, etc.). The clauses authorising the completion of audits and setting out EDF's expectations in terms of enforcement of fundamental rights and main international standards by suppliers and sub-contractors have progressively been added to contracts.

Audit Framework

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 assessment method and grid were developed with the World Nuclear Association (WNA)⁵². 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 & Metals (ICMM)'s Sustainable Development Framework". The issue of safety, which is particularly critical in the mining sector (process safety), constitutes a standardised framework recognised by all players in the sector. It takes into account the issues of human rights and fundamental freedoms (human rights, whistleblowing register, rights of indigenous peoples and radiation protection), health and safety of people and the environment, in the broadest sense of that term (greenhouse gases, water, biodiversity waste, site clean-up after extraction).

52. Guidelines for Evaluating Supplier Performance at Uranium Mining and other Processing Sites in the Nuclear Fuel Supply Chain.



Audits

EDF conducts mine audits every year using internal resources with occasional support from external auditors. The reports present the main strengths, recommendations and suggestions. Among these, the most recurring relate to health and safety (such as radiological controls, the provision and wearing of appropriate personal protective equipment, the display of safety instructions and the location of fire equipment in premises, or the organisation of training on nuclear safety), a reminder of the need to analyse the causes and trace the corrective actions after any incident or accident, the actions to monitor the environmental footprint (notably CO2 emissions), working and accommodation conditions (notably at the remote sites) or the correction of discrepancies observed (calibration of measuring instruments, traceability of certifications issued). Audit recommendations are incorporated into suppliers' action and continuous improvement plans. Each supplier is audited every three years.

Coal supply

Since the takeover of its coal contracts by JERA Trading (JERAT), EDF no longer has direct contractual relationships with mining companies or the market, but remains a promoter of Bettercoal, the responsible coal procurement initiative of which EDF was a founding member. Bettercoal brings together energy companies, port institutions and coal terminals to advance CSR in the coal supply chain, particularly in the mines, and notably to ensure respect for fundamental rights.

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, but also performance requirements regarding: 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, and the environment.

JERA Trading, an EDF supplier, has become a member of Bettercoal. No transactions were carried out in 2024.

Gas supply

Edison and the EDF group's Gas Asset Management Department (DGAG) implement a business integrity evaluation process that incorporates human rights considerations. These integrity checks are carried out through an extensive process of knowing the potential counterparty (Know-Your-Counterpart), which is part of the EDF group's ethics and compliance policy. This verification is carried out even before the start of any relationship with a potential counterparty, and the verification is repeated periodically even after the establishment of a commercial relationship.

Regarding counterparties involved in gas supply contracts, Edison and DGAG regularly monitor new information (including in terms of human rights) that may have a negative impact on the reputation of the counterparties and that of the EDF group. This evaluation applies to all of the Group's contracts, and in particular to the Group's long-term gas commitments (longer than five years).

Regarding the Group's gas trading activities, EDF Trading applies a due diligence process to all existing or potential counterparties that includes human rights issues. This process is based on international human rights standards that the Group is committed to respect in its business relationships. In addition, EDF Trading continuously monitors its counterparties to identify any potential problems.

Biomass supply

The Group application note on sustainable biomass includes a human rights section indicating the main risks that may exist in this value chain: child labour, forced labour, degraded working conditions, respect for the rights of indigenous populations. These risks may be exacerbated by the potential presence of vulnerable workers (migrant workers, informal work situations, etc.). The Group recommends implementing pre-contractual procedures concerning supply chain compliance, as well as the inclusion of specific clauses when contracting. In addition, suppliers are required to comply with the CSR charter between EDF and its suppliers, a component of contracts.

Fuel transportation

As part of the chartering policy of the Group's companies, the chartering and approval of vessels that are to unload liquid fuels at port facilities operated by the Group systematically includes an inspection or vetting carried out with the support of Rightship's services. This company assesses vessels according to its vetting which includes various criteria related to the protection of workers, including:

- checking that the shipowner is not blacklisted for abandoning seafarers (ILO list);
- this same verification is carried out for the vessel itself;
- the search for any alerts for "Human rights at Sea infringements - Poor working-living conditions";
- checking that the vessel does not fly the flag of a country that is not a signatory to the MLC convention (Maritime Labour Convention) of 2006 and in this case, if it complies with an equivalent system.

In addition, vessels chartered by Edison for the transport of small-scale LNG⁵³ are under the French flag, and the Contracting State must comply, for all aspects related to the ownership, operation and management of the vessel, with the following rules:

- international conventions, laws and regulations, including international sanctions;
- European Union regulations and directives;
- the laws and regulations of the flag State of the vessel;
- the laws and regulations of the ports and other places where the vessel calls, and the waters through which it transits.

Lastly, for vessels chartered by Edison and EDF for FOB contracts⁵⁴, also flying the French flag, the contracts provide for employment conditions for the ship's staff and crew in line with the standards of the International Transport Workers Federation (ITF). The vessel must have a Blue Card (international certification) or equivalent certification.

In contractual terms, the shipowner must report to the Group all information relating to the health and safety of employees and the environmental impact of vessels, including spills at sea and pollutant emissions.



⁵³ Small-scale LNG: Small-scale LNG generally refers to LNG-related facilities (reception terminals, storage units, vessels, etc.) with similar characteristics but of a smaller scale than the conventional LNG infrastructures.

⁵⁴ FOB, or "free on board" means that the seller provides the goods without transport and insurance costs.



3.

Alerting and monitoring

3.1 The EDF group's whistleblowing system

The EDF group's whistleblowing procedure was revised in 2023 to take account of the Waserman Law of 21 March 2022, transposing into French law the European directive on the protection of whistleblowers, and its implementing decree of 4 October 2022. After being validated by the competent authorities, the revised whistleblowing procedure will come into force on 1 June 2023.

3.1.1 Scope

In order to make report-handling more secure and to strengthen the confidentiality and security of personal data, in 2018, the Executive Committee decided to set up a single whistleblowing system for all wrongdoing reported under the Sapin II Law and the Duty of Vigilance Law, as well as wrongdoing reported by employees and external employees, and third-party direct witnesses, alleging harassment and discrimination. This Group system benefits all Group entities, except for the subsidiaries in the regulated sector, Enedis and RTE, which have their own whistleblowing system to uphold their managerial independence.

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

The referee body for the EDF group procedure for collecting and processing reports of wrongdoing, appointed by the Executive Committee, is the Group Ethics and Compliance Division (DECD)⁵⁵.

Information concerning the whistleblowing system is available on the EDF website and is therefore accessible to all (external employees, suppliers and subcontractors and third parties (customers, local residents, etc.). The website notably reminds users that the Group's whistleblowing procedure guarantees protection against any retaliation or discriminatory measures for any whistleblower who meets the conditions set out in the legislation in force. These points are also included in the "Whistleblower Support Guide" and in the EDF Code of Conduct.

This information is also available on the intranet, notably through an animation on the Group's whistleblowing system, including a video, the Whistleblower Support Guide, and a link to the Group platform; posters are also placed at the sites ("How to alert?" which summarises the employees and workers who may report, the facts that may be reported, the respect for the confidentiality and protection of the whistleblower, as well as the procedures for referral to the whistleblowing system, with a QR code allowing direct access to the

support guide as well as a QR code allowing direct access to the outsourced platform).

In addition, each entity's Ethics and Compliance Manager (EDF and subsidiary divisions) is in charge of communicating the whistleblowing procedure to employees (relaying information through their own community or during awareness-raising campaigns, notably during the "Ethics & Compliance All Actors" week). With regard to suppliers and subcontractors, the whistleblowing system is included in the CSR charter between EDF and its suppliers, which is a component of the contract.

3.1.2 System

Accessibility of the system

The Group whistleblowing system, managed from an independent server that is not connected to EDF's IS, can be accessed at any time via the EDF group website. The interface is available in several languages (French, English, Italian, Spanish, German, Portuguese, Dutch and Mandarin) in France and abroad, and the whistleblower can report wrongdoing in the language of their choosing.

Locally, it is possible to carry out an alert in writing to the Ethics and Compliance Manager or line manager, human resources and any other authorised functions in the entity's local implementation note.

EDF Renewables uses the EDF group's Grievance Mechanism. For certain large international projects, a local grievance system is set up.

Reporting wrongdoing

The EDF group whistleblowing procedure to report facts constituting:

- a violation or an attempt to conceal a violation of the law or a regulation falling under the EDF group's scope of responsibility;
- a violation or an attempt to conceal a violation of an international commitment ratified by France, of a European Union law, or of the Code of Conduct, falling under the EDF group's scope of responsibility;
- a threat or damage to the general interest falling under the EDF group's scope of responsibility;
- a risk or serious infringement of human rights and fundamental freedoms, the health and safety of individuals or the environment, falling under the EDF group's scope of responsibility and its business relations.

⁵⁵ Decree of 4 October: The referee is tasked with gathering the wrongdoing report and with processing it in compliance with the procedure. This referee is appointed by the Company.



Whistleblower protection: mechanisms in place to identify, report and investigate non-compliance/unlawful behaviour

The Group procedure for processing whistleblowing was reviewed during 2023, to factor in the developments entailed in the transposition in French law of the European Directive for whistleblower protection. The Group's ethics, compliance and duty of vigilance whistleblowing procedure applies to all EDF group's entities. This whistleblowing procedure guarantees protection against any retaliation or discriminatory measures for any whistleblower who meets the conditions set out in the legislation in force. The Group Ethics and Compliance Division is responsible for managing and monitoring the implementation of this procedure. As indicated in the Whistleblower Support Guide, available on the EDF website, the status of "whistleblower" covers professional protection against any reprisal measures, and the DECD also keeps archived data in order to ensure the whistleblower's protection.

3.1.3 Whistleblowing alerts in 2024

2024 results

Whistleblowing results are consolidated and included in the annual ethics and compliance report submitted to the Executive Committee and presented to the EDF Board of Directors' Corporate Responsibility Committee. The DECD consolidated all admissible alerts made in 2024 at the EDF group, and Enedis (via the Group system or any other channel).

In 2024, 449 admissible alerts were recorded (including 93 in the Group whistleblowing system); 335 alerts related to incidents located in France and 114 abroad; 151 related to EDF and 298 to Group subsidiaries. Among them, 45% of the cases reported relate to harassment/discrimination. In 2024, 65% of the alerts processed were sufficiently detailed to give rise to corrective actions or disciplinary sanctions (16 dismissals pronounced for proven harassment). 42% of alerts for which the facts were not proven nevertheless gave rise to actions to improve processes.

Types of alerts

	Alerts admissible in 2024, all types of stakeholders concerned
Rights and protection of individuals	46
• of which human rights	1
Harassment – discrimination	203
Fraud – corruption and conflicts of interest	139
Other categories	61

Types of stakeholders involved in human rights alerts:

	Alerts admissible in 2024
Total human rights alerts	1
• of which workers in the value chain	1
• of which affected communities	0
• of which consumers or end-users	0

Note for these 2024 results:

- alerts admissible in the Group system: 61% in 2024;
- the 2024 results of investigations following alerts: 45% of investigations were non-proven, 46% proven and 9% partially proven;
- the whistleblower's relationship with the Group (all channels combined): 80% employees, 10% third-parties, 9% external employees, 1% occasional employees.

Measures taken following alerts (all channels combined): 57% corrective, 10% disciplinary and corrective, 22% disciplinary, 6% judicial, 4% judicial and corrective, 1 disciplinary, judicial and corrective case, and 1 disciplinary and judicial case.

3.2 Monitoring system

The Group’s vigilance team is committed to developing the vigilance plan monitoring system in a continuous improvement approach. This system is based on the operational action plan which is monitored by the Steering Committee. This action plan is regularly presented to the CDRS⁵⁶ (see p.11).

Assessment of the vigilance plan monitoring system is included in the annual internal control plan, and a due diligence risk guide has been drawn up and implemented. Entities use this guide for self-assessment of their compliance with duty of vigilance requirements.



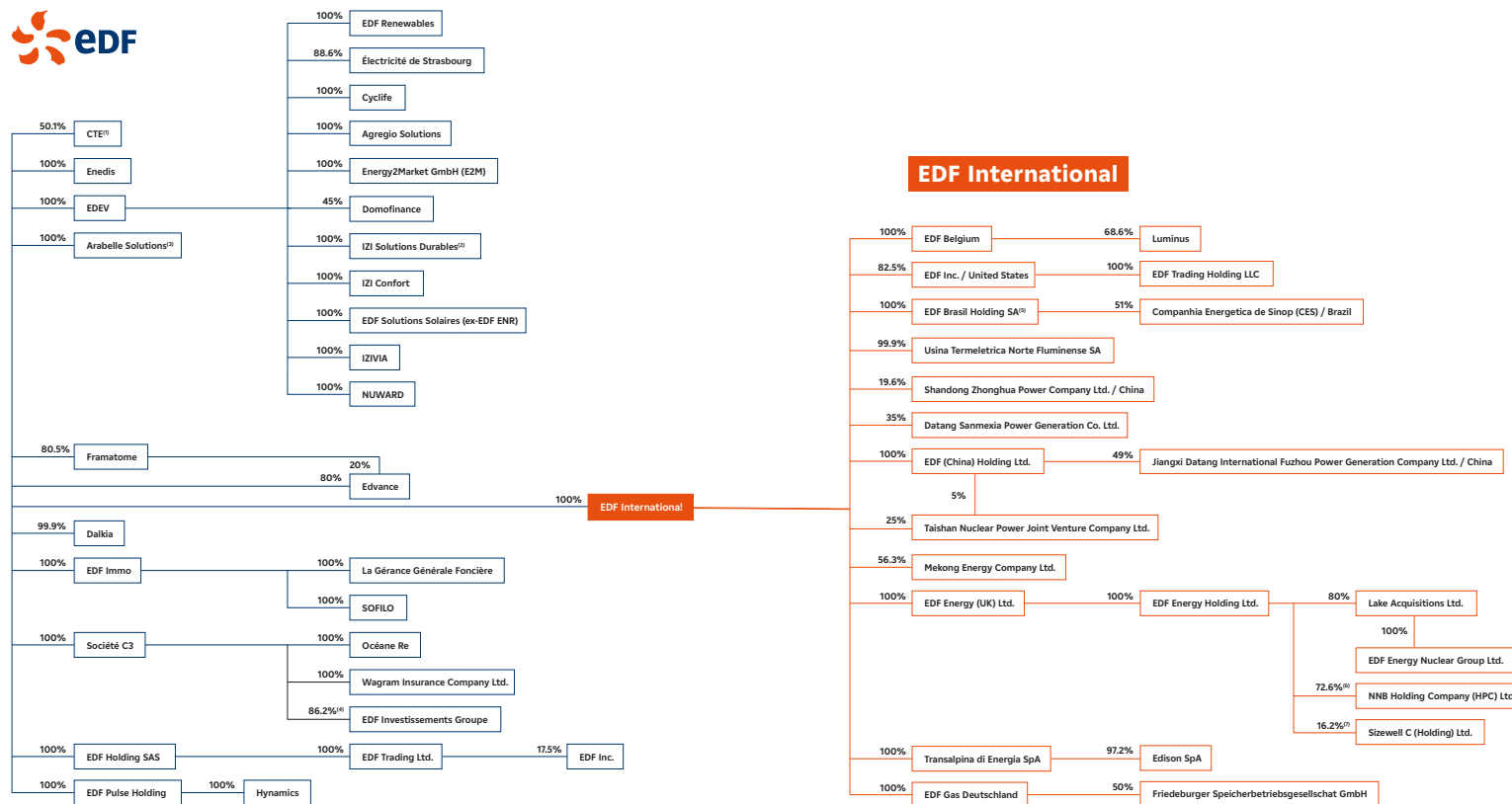
56 Since 27 January 2025, the CMDRSE (Global Dialogue Committee on Environmental and Social Responsibility) has been monitoring the implementation of and compliance with the commitments of the abovementioned agreement.



Structure of the Group

A simplified organisation chart of the Group at 31 December 2024 is presented below. The percentage given for each entity (subsidiary or sub-group of subsidiaries) corresponds to the ownership interest held directly or indirectly in the capital. The values given are rounded. The companies or groups of companies included in the Group's scope of consolidation are indicated in section 6.1, note 3.3 "Scope of consolidation at 31 December 2024" to the consolidated financial statements for the financial year ended 31 December 2024. Changes in the scope of consolidation for 2024 are presented in section 6.1, note 3.1.1 "Changes in the scope of consolidation" to the consolidated financial statements for the financial year ended 31 December 2024.

See section 1.2.1 "Group organisation" of the Group's 2024 Universal Registration Document, available on the Group's website



⁽¹⁾ Centreprise de Transport d'Électricité (CTE), the company that holds 100% of RTE.
⁽²⁾ IZI Solutions Rénov was merged into IZI Solutions Durables on 31 May 2024.
⁽³⁾ Arabelle Solutions corresponds to the nuclear activities of GE Steam Power acquired on 31 May 2024.
⁽⁴⁾ On 6 November 2024, a €520 million capital increase was subscribed by Natixis Belgium Investments, which now holds 13.78% of EDF IG's capital as at 31 December 2024 (754% at 31 December 2023) while EDF, via C3, holds the remaining 86.22% (92.46% at 31 December 2023).

⁽⁵⁾ Certain subsidiaries previously held by EDF Norte Fluminense (including Companhia Energetica de Sinop, a 5% owned company consolidated under the equity method) are now held by EDF Brasil Holding.
⁽⁶⁾ See section 6.1 note 16.4 "Non-controlling interests" to the consolidated financial statements for the financial year ended 31 December 2024.
⁽⁷⁾ See section 6.1 note 112.3 "Investments in associates and joint ventures" to the consolidated financial statements for the financial year ended 31 December 2024.

Risks to which the Group is exposed

Table of risks - numbers, names and criticality

The criticality assessment takes account of the control actions undertaken.

Category	Risk	ESRS standard*	Criticality
1. Operational performance risks	1A - Risks related to management of large, complex industrial projects, including EPRs	S1-S2-S3	■■■
	1B - Risk of non-achievement of objectives concerning operation and/or lifespan extensions of nuclear power plants (France and the United Kingdom)	S1-S2-G1	■■■
	1C - Risk of attacks against assets, including cyber-attacks	G1	■■■
	1D - Risks to health or safety at work (employees and contractors)	Cross-cutting S-S1-S2	■■
	1E - Risks related to operational continuity of supply chains and contractual relations	E4-S1-S2-G1	■■
	1F - Hydropower safety risks	Cross-cutting S	■■
	1G - Supply/demand imbalance risk for EDF	1G	■■
	1H - Blackout risk	1G	■
	1I - Industrial safety risks and impact on environmental assets, including biodiversity	Cross-cutting E-E2-E4-E5-Cross-cutting S	■
2. Specific nuclear operation risks	2A - Risks related to control of radioactive waste processing, decommissioning of nuclear facilities, and secure coverage of the related obligations	E5	■■
	2B - Risks related to control of the fuel cycle	S1- S2	■■
	2C - Nuclear safety risks at plants in operation resulting in nuclear civil liability	Cross-cutting S	■■
3. Market regulation, political and legal risks	3A - Risks related to changes in public policies and the regulatory framework in France and Europe, particularly the ARENH and post-ARENH schemes	S4-G1	■■■
	3B - Risks related to changes in the legislative and regulatory framework for hydropower concessions		■■
	3C - Risks related to changes in the legislative and regulatory framework for electricity distribution concessions		■■
	3D - Ethics or compliance risks	S1-S2-S4-G1	■
	3E - Litigation risk		■
4. Financial and market risks	4A - Energy market risk		■■■
	4B - Risk related to the Group's balance sheet assets and liabilities		■■
	4C - Financial market risk		■■
	4D - Interest rate risk		■■
	4E - Liquidity risk		■■
	4F - Counterparty risk		■■
	4G - Foreign exchange risk		■
5. Group transformation and strategic risks	5A - Skill adaptation risks	S1- S2	■■
	5B - Climate change adaptation: physical risks and transition risks	E1-E3	■■
	5C - Transformation capability risk in the face of disruptive change	S1- S2	■■
	5D - Long-term employee benefit obligations risk		■■

Criticality: : ■■■ high ■■ intermediate ■ moderate

*This column indicates any IROs identified in application of the European Sustainability Reporting Standards (ESRS) that correspond to the risk. Details of the correspondence are provided in section 3.1.4.2 "Correspondence between the IROs (sustainability statement) and the main risks to which the Group is exposed (section 2.2 of the URD)".

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 this document as follows:

Salient risks related to the duty of vigilance			Issues and commitments of the EDF group	
Area	Type of risk	Risk	Descriptions of the 2024 mitigations and actions in the different sections of the Sustainability Statement	
Human rights and fundamental freedoms	Cross-cutting	Risks related to harassment and discrimination.	ESRS S1 Own workforce ESRS S2 Workers in the value chain	ESRS 2 General information
	Activities and projects	Risk of infringement of the rights of communities and indigenous peoples: <ul style="list-style-type: none">risks related notably to land issues and population displacement or the consequences of inadequate consultations.risks related to the use of security forces.	ESRS S3 Affected communities	
	Activities and projects	Risk of infringement of workers' rights, notably risks related to decent working and housing conditions.	ESRS S1 Own workforce ESRS S2 Workers in the value chain	
	Activities and projects	Risk of forced labour by subcontractors.	ESRS S2 Workers in the value chain	

Salient risks related to the duty of vigilance			Issues and commitments of the EDF group	
Area	Type of risk	Risk	Descriptions of the 2024 mitigations and actions in the different sections of the Sustainability Statement	
Environment	Cross-cutting	Impact on the climate: climate change and greenhouse gas emissions.	ESRS E1 Greenhouse gas emissions	
	Cross-cutting	Impact on air and water quality.	ESRS E2 Discharges with effects on air, water and soil quality	
	Cross-cutting	Impacts on resources.	ESRS E3 Water and marine resources ESRS E4 Biodiversity and ecosystems ESRS E5 Resource use and circular economy	ESRS 2 General information
	Cross-cutting	Impacts on biodiversity.	ESRS E4 Biodiversity and ecosystems	
Human health and safety	Employees and subcontractors	Work-related accidents, work-related diseases (asbestos, chemicals, ionising radiation and noise).	ESRS S1 Own workforce ESRS S2 Workers in the value chain	ESRS 2 General information
	Employees and subcontractors	Musculoskeletal disorders, anxiety-depressive disorders, including stress.	ESRS S1 Own workforce ESRS S2 Workers in the value chain	
	Local residents	Safety of nuclear and hydropower facilities.	ESRS S3 Affected communities ESRS E2 Pollution ESRS E3 Water and marine resources	
	Local residents	Air quality.	ESRS S3 Affected communities ESRS E2 Pollution	

Salient risks related to the duty of vigilance			Issues and commitments of the EDF group	
Area	Type of risk	Risk	Descriptions of the 2024 mitigations and actions in the different sections of the Sustainability Statement	
Suppliers and subcontractors	Purchase category	Electricity Instrumentation and Control.	ESRS G1	ESRS 2 General information
	Purchase category	Civil engineering, decommissioning and decontamination.	Governance information	
	Purchase category	Heavy lifting systems.	ESRS S2 Workers in the value chain	
	Purchase category	Non-destructive controls/testing and maintenance in an industrial environment.	ESRS S3 Affected communities	
	Purchase category	Industrial goods and services.	ESRS E1 Climate change	
	Purchase category	IT and telecom equipment.	ESRS E2 Pollution	
	Purchase category	IT solutions, publishing, hosting and support.	ESRS E3 Water and marine resources	
	Purchase category	Work on new and existing buildings.	ESRS E4 Biodiversity and ecosystems	
	Purchase category	Production line for solar panels and batteries.	ESRS E5 Resource use and circular economy	

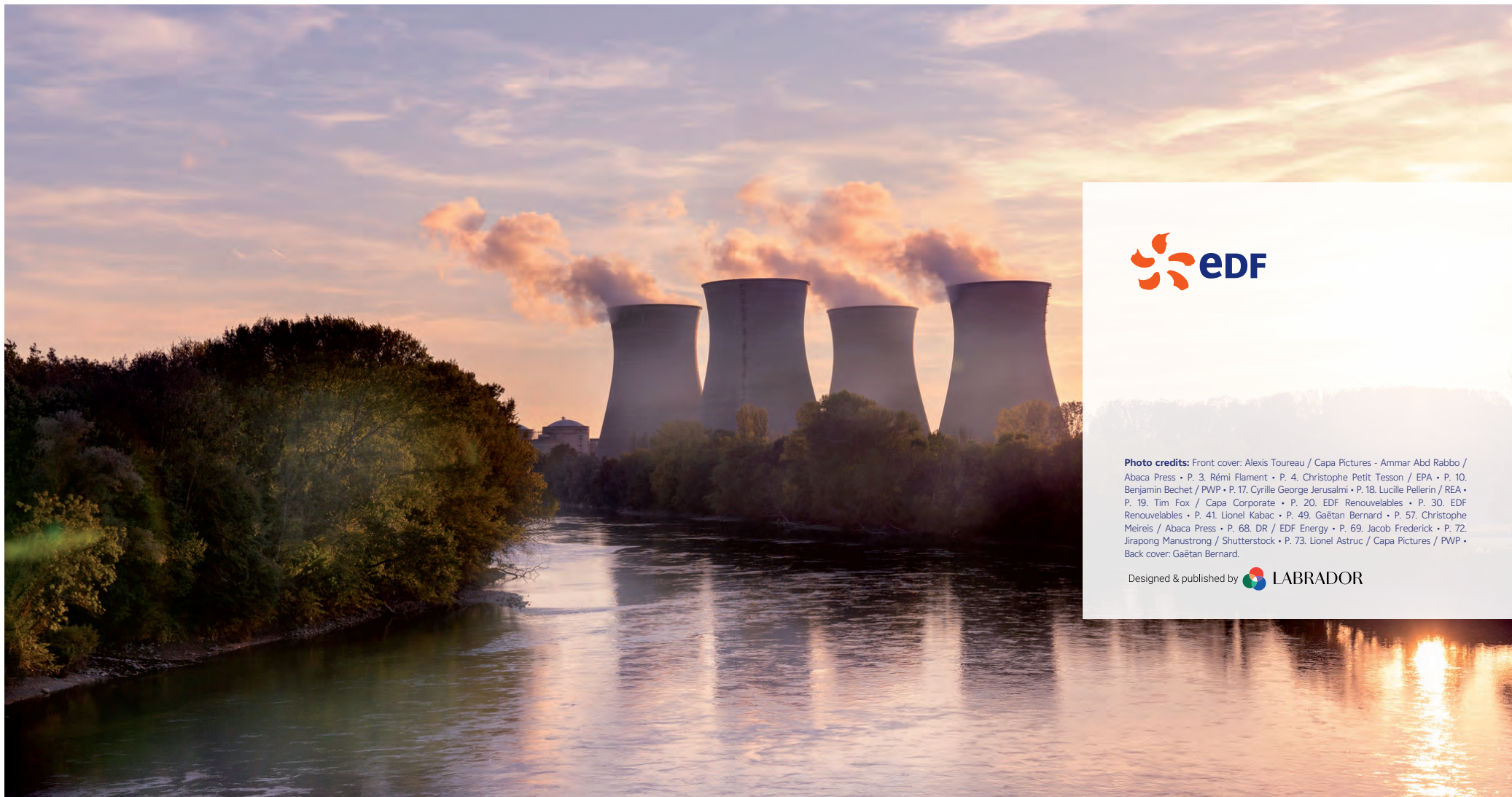


Photo credits: Front cover: Alexis Toureau / Capa Pictures - Ammar Abd Rabbo / Abaca Press • P. 3. Rémi Flament • P. 4. Christophe Petit Tesson / EPA • P. 10. Benjamin Bechet / PWP • P. 17. Cyrille George Jerusalmi • P. 18. Lucille Pellerin / REA • P. 19. Tim Fox / Capa Corporate • P. 20. EDF Renouvelables • P. 30. EDF Renouvelables • P. 41. Lionel Kabac • P. 49. Gaëtan Bernard • P. 57. Christophe Meireis / Abaca Press • P. 68. DR / EDF Energy • P. 69. Jacob Frederick • P. 72. Jirapong Manustrong / Shutterstock • P. 73. Lionel Astruc / Capa Pictures / PWP • Back cover: Gaëtan Bernard.

Designed & published by  LABRADOR