2025
vigilance plan

May 2026

Content

Introduction

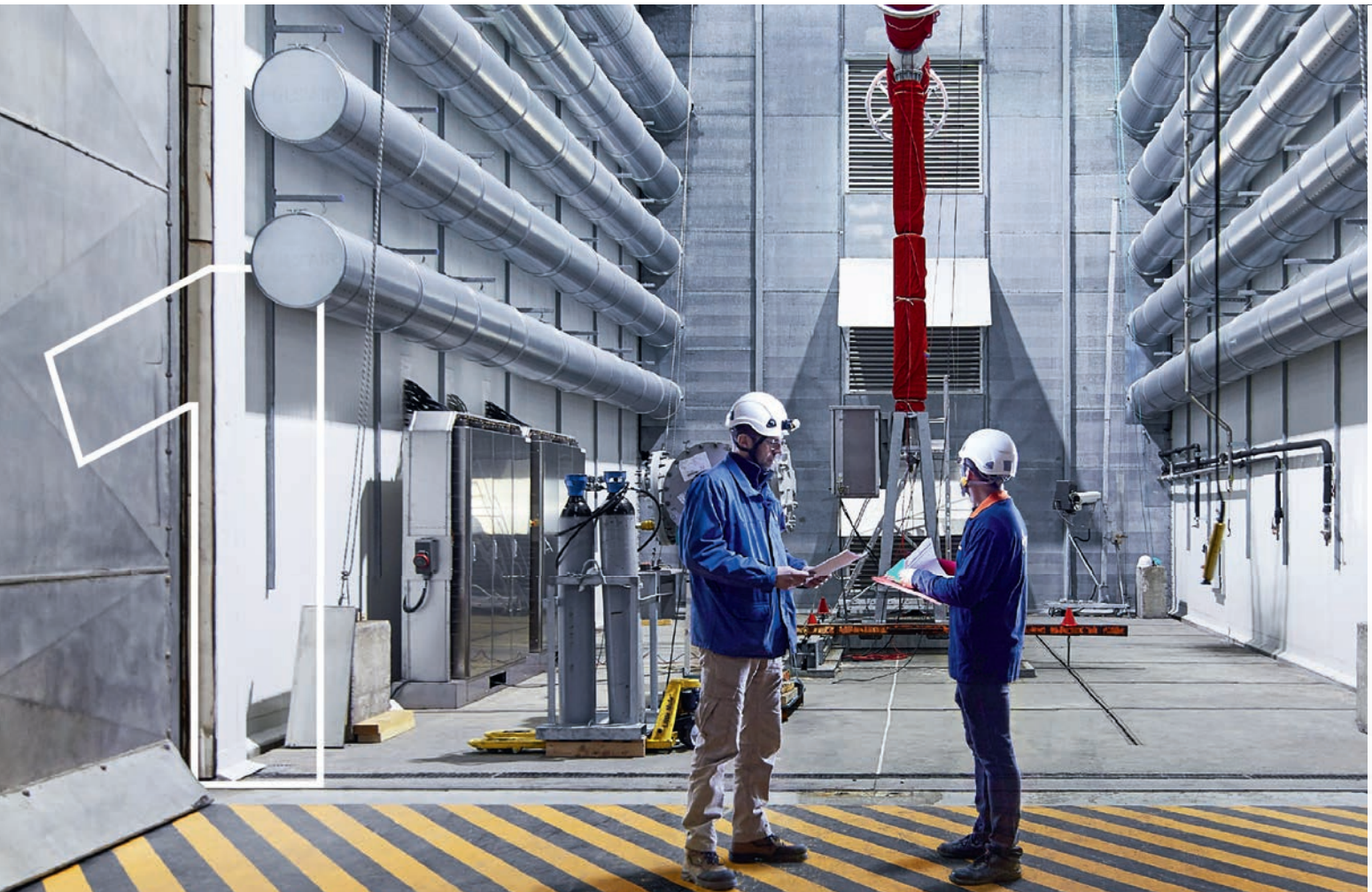
French Law No. 2017-399 of 27 March 2017 on the duty of vigilance of parent companies and ordering companies introduced, in Article L. 225-102-4 of the French Commercial Code, the obligation to draw up and implement a vigilance plan.

This plan must include *"reasonable vigilance measures to identify risks and prevent serious violations of human rights and fundamental freedoms, the safety and health of individuals and the environment"* that may result from the activities of the Company and its controlled subsidiaries, as well as the activities of suppliers or subcontractors with which it has an established business relationship, insofar as their activities are connected to that relationship.

It must also include a description of five measures:

1	2	3	4	5
Risk mapping to identify, analyse and rank risks	**Procedure for regular assessment** of the situation of controlled subsidiaries, subcontractors and suppliers based on the risk mapping	**Appropriate actions to mitigate risks** or serious harm prevention	**Whistleblowing mechanism** for reporting the existence or occurrence of risks	**System for monitoring the measures implemented** and evaluating their e˜fectiveness

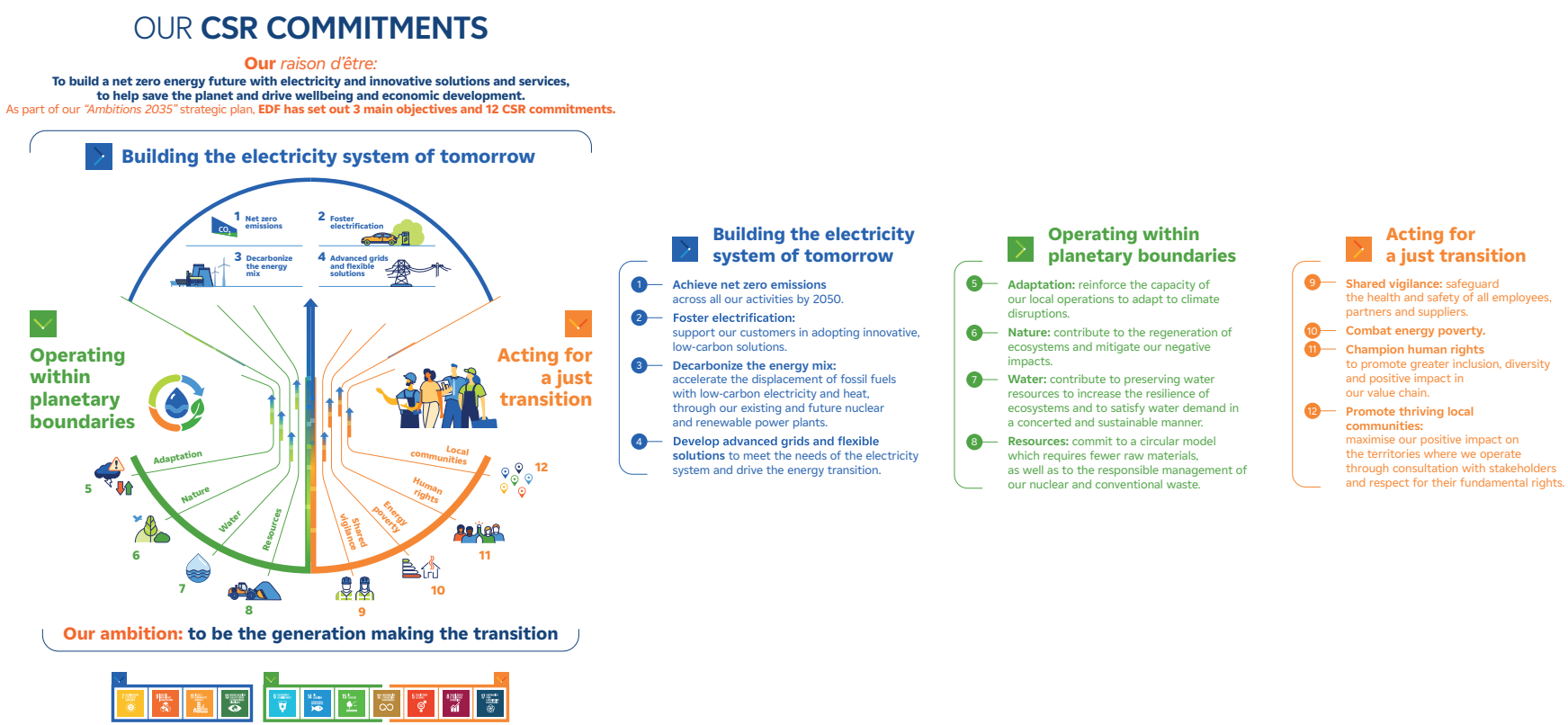
In this document, unless otherwise indicated, the terms "Company" and "EDF" refer to the company Électricité de France SA and the terms "EDF group" and "Group" refer to EDF and its subsidiaries and equity investments.



Framework of the vigilance plan

1.1 Presentation of the Group

1.1.1 Raison d'être and CSR commitments



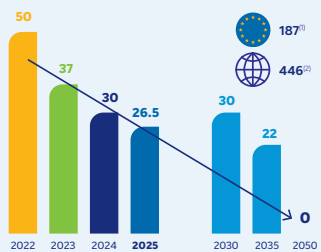
1.1.2 *Key figures 2025*

EDF's carbon trajectory

Carbon intensity trajectory

(In gCO2/kWh)

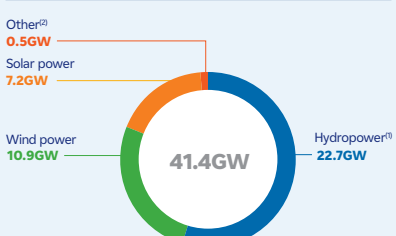
Around 7 times lower than the European average
and more than 17 times lower than the global average



(1) 2024 value, EU-27, European Environment Agency.
(2) 2024 value, International Energy Agency, World Energy Outlook 2025.

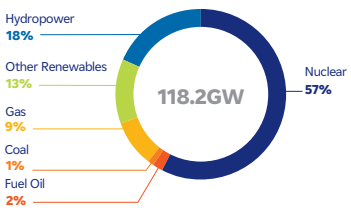
EDF, the renewable energy leader in Europe

Net installed renewable capacities by sector at end-2025



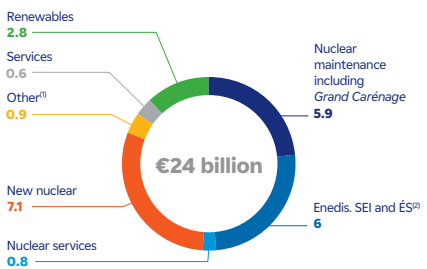
(1) Including marine energy: 0.24 GW.
(2) Biomass, geothermal energy.

Installed capacities(1)



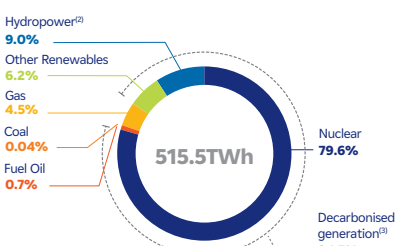
(1) Consolidated data.

Net investments excluding disposal plan



(1) Including central functions, real estate, gas and fuel oil.
(2) SEI: Systèmes Énergétiques Insulaires (Island Energy Systems). ÉS: Électricité de Strasbourg.

Electricity generation(1)

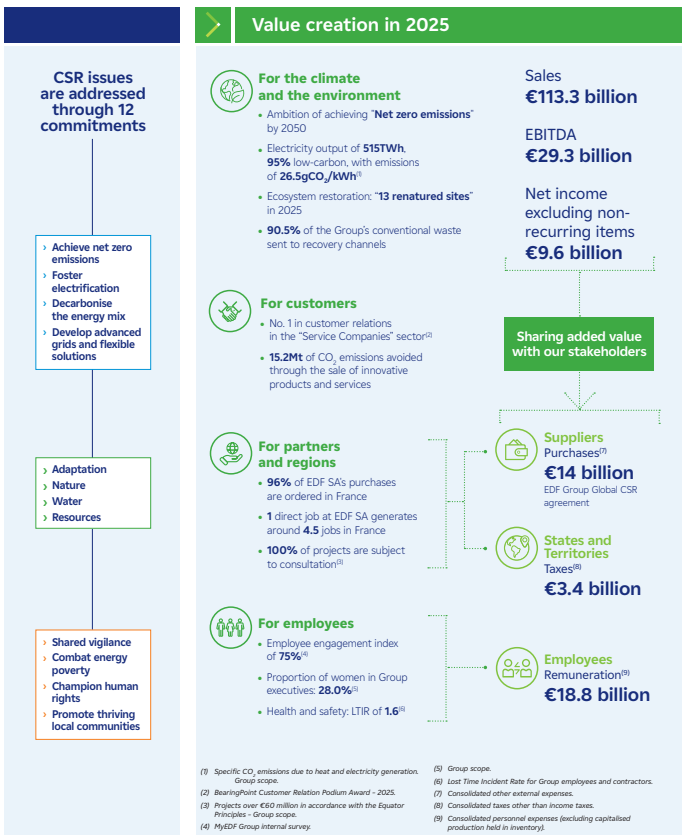


(1) By fully consolidated entities.
(2) Including pumped-storage hydropower and marine energy.
(3) Direct carbon emissions related to generation, excluding the life cycle analysis of generation facilities and fuel.

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 is part of the Group's strategy.

EDF is currently the world's leading electricity producer with no direct CO_2 emissions.(1) For every kWh produced, EDF emits 7 times less CO_2 than the average for European utilities in 2024 (187 gCO_2/kWh)(2) and 17 times less than the worldwide average (446 gCO_2/kWh)(3) 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 by 2035 the reduction in direct emissions will reach 80%. The carbon intensity of the electricity generated by the Group will be **30 gCO_2/kWh by 2030 and should drop to 22 gCO_2/kWh by 2035.** Furthermore, EDF is committed to reducing its indirect emissions by 35% by 2030 compared to 2019, and by 45% by 2035.



(1) Enerdata, World ranking of zero direct CO_2 emissions power producers (2024, TWh), https://power-producers-ranking.enerdata.net/
(2) EEA Greenhouse gas emission intensity of electricity generation in Europe 2025.
(3) 2024 data, International Energy Agency, World Energy Outlook 2025.

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

EDF's vigilance plan complies with:

- UN Guiding Principles on Business and Human Rights (UNGP);
- OECD Guidelines for Multinational Enterprises;
- Conventions of the International Labour Organization (ILO) guaranteeing fundamental principles and rights at work and combating discrimination;
- UN International Bill of Human Rights;
- Declaration on the Rights of the Child;
- Declaration on the Elimination of All Forms of Discrimination against Women.

In this context, the Group published on its website its duty of vigilance framework entitled "Human rights and fundamental freedoms, Safety and health, Environment and Business ethics: the EDF group's commitments and requirements"[4], which includes:

- the Group's commitments and requirements (EDF SA and the companies it controls, see section 1.3.1 "Main characteristics of EDF as regards the duty of vigilance law");
- the fundamental requirements regarding its business partners in terms of respect for human rights and fundamental freedoms, environmental protection, protection of personal safety and health, and business ethics.

These commitments were approved and signed by the Chairman and Chief Executive Officer and apply to the activities of EDF SA and all the companies it controls, for all Group employees, with the exception of RTE and Enedis. The notion of "business relationship" includes the suppliers and subcontractors with whom an established business relationship is maintained, as well as project partners. In compliance with contractual obligations, a breach of these requirements, repeated and not corrected after observations are made, may lead to the termination of the relationship.

This reference framework refers to and cross-references all of the Group's internal policies, which are prescriptive and apply to all controlled entities. The Group's entities are responsible for rolling out, or incorporating into their own policies, the requirements associated with these policies as well as the operational procedures to comply with them.

The obligations in terms of the duty of vigilance are backed by these guidelines, policies and procedures, including:

- the policies relating to the themes covered by the duty of vigilance: Corporate Social Responsibility (CSR), safety and health, nuclear safety;
- those that are indirectly associated but essential for the due implementation of the law: risk management and internal control, project management, ethics and compliance, as well as the Supplier and Purchasing Policy;
- the Group's guidelines, instructions and charters:
  - the vital rules and the BEST reference framework in terms of safety and health in connection with the Safety and Health Prevention Policy,
  - the Ethics Charter, the Ethics and Compliance Code of Conduct, as well as the instruction on the assessment of third parties,
  - the CSR Charter between EDF and its suppliers,
  - the global master agreement on the Group's social and environmental responsibility.

The Group's vigilance approach is based on an assessment and a roll-out as part of the Group's policies, guidelines, procedures, instructions and charters that address environmental, human rights and safety and health issues, or on key processes such as risk mapping, internal control, procurement and project management.

(4) Published in French and English on the website edf.fr (https://www.edf.fr/sites/groupe/files/2023-02/edfgroup_rse_referentiel-ddv-2021_en.pdf).

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 Manager.[5] 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 Department.

Governance level

The Group's vigilance plan and the actions stemming from it are validated by the CSR Strategy Committee, chaired by the Group's Chairman, and submitted to the Corporate Responsibility Committee, a committee of the Board of Directors dedicated to social and environmental responsibility issues.

Executive level

The Group Executive Committee's Commitments Committee 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 Chief Executive Officer, 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 vigilance.

Oversight Level

The vigilance plan is designed and overseen in collaboration with the Legal Affairs Department and the Impact Department within a Steering Committee and a Strategy Committee that also includes the Human Resources Department, the Procurement Department, the Risk Department, EDF power solutions[6], the Ethics and Compliance Department, the Export Control and International Sanctions Department, and representatives of subsidiaries with exposed activities.

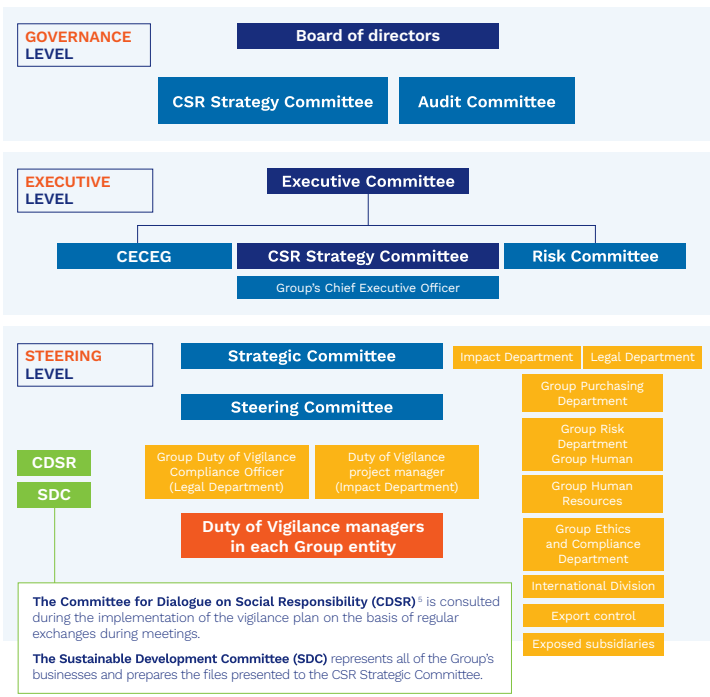
Based on proposals made by the Steering Committee, the Strategy Committee defines the orientations and objectives of the vigilance plan in a collegiate manner, ensures that these objectives are achieved, and may redefine them following operational advances.

The deployment and coordination of the vigilance plan relies on a network of Duty of Vigilance Managers appointed in each Group entity involved in CSR, ethics, compliance or internal control (see section 1.3.3 "Main improvements to the EDF group's vigilance plan in 2025").

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 Strategy Committee.

Governance of the vigilance plan



(5) The Group General Secretary and the Group Executive Director in charge of innovation, corporate responsibility and strategy.
(6) Since February 2025, the activities of EDF Renewables, EDF's International Department and EDF's International Legal Department have been combined within the EDF power solutions entity.

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 its stakeholders.

The Global Framework Agreement on EDF Group's Corporate Social and Environmental Responsibility[7], signed in 2025 for a five-year period 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"

Global Dialogue Committee on Social and Environmental Responsibility

The Global Committee for Dialogue on Social and Environmental Responsibility[8], composed of representatives from all signatories to the agreement, works on a number of issues related to the duty of vigilance (safety and health, exercising the Group's responsibility in international projects, etc.) and on the actions to be implemented to deploy and improve the Group's vigilance plan, such as the procedures for exercising the EDF group's duty of vigilance within its supply chain, respect for the human rights of its employees as well as those of its subcontractors and the populations impacted by its activities.

Thus, in accordance with the new agreement, 2025 was mainly devoted to its deployment throughout the Group. In addition to this topic, the first annual plenary session, held in September 2025, brought together all committee members to discuss current issues relating to the duty of vigilance, as well as the development of a roadmap for the monitoring body dedicated to the implementation of this agreement. These meetings of the Global Committee for Dialogue on Social and Environmental Responsibility are an opportunity for discussions to answer members' questions on subjects related to the Group's duty of vigilance or on local matters of concern of which members are aware.

Discussions with external stakeholders

Within the framework of meetings arranged by the French non-profit organisation Businesses for Human Rights (*Entreprises pour les droits de l'homme* - EDH[9]), EDF participated in meetings with other companies, lawyers, NGOs, and trade union federations for open discussions about stakeholder expectations, the practices of other companies, and how its vigilance plan elaboration processes can be improved.

Furthermore, since 2022 people specialising in human rights and just transitions at the International Labour Organization (ILO) have been members of the Group's Stakeholder Council. The vigilance plan is sent to the members of this body every year so that their feedback can be incorporated into the next plan.

At the same time, the Group continuously pursues open discussions with the various civil society actors (associations, public figures) who wish to keep up this dialogue, to contribute to and enhance its vigilance plan[10].

(7) Agreement signed on 27 January 2025.
(8) Since 27 January 2025, CMDRSE (Global Dialogue Committee on Environmental and Social Responsibility) has monitored the implementation of and compliance with the commitments of the aforementioned agreement.
(9) www.e-dh.org
(10) See infographic in the appendix.

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

"G4" presence

The Group's core development scope in Europe is its "G4", comprising France, Belgium, Italy and the United Kingdom. EDF is present in these countries as a key player in electricity generation, but it also has 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 that help customers reduce their carbon footprint in coherence with the local energy policy choices.

International development

In the rest of the world, outside the "G4", the Group is growing in a targeted manner, by engaging in value-creating projects in growth markets, and by exporting its recognised know-how to countries in search of concrete solutions for the success of the energy transition. To this end, the Group aims for business models that favour deconsolidation while preserving an industrial role that makes it possible to capitalise on the Group's experience and inspire confidence among its financial or institutional partners. This enables EDF to be aligned with the best practices of leading partners in competitive markets, while also developing new industrial skills and accelerating its capacity for innovation, both from a technological and contractual perspective.

For countries considered to be "higher-risk", particular vigilance is exercised, including over relations with partners.

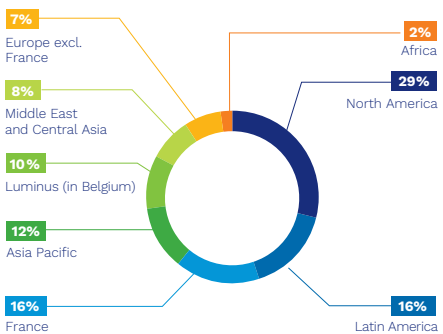
As regards the EDF group's international projects, EDF power solutions[11] activities span some 20 countries, including France and Belgium through Luminus, and five geographic areas: North America, Latin America, Africa, Europe, the Middle East, Central Asia, and Asia-Pacific. EDF power solutions has historically had a strong presence in Europe, notably in the United Kingdom. In recent years, the Middle East (United Arab Emirates, Saudi Arabia and Oman) has also been an area of strong development. EDF power solutions is also continuing the developments initiated in Central Asia (Uzbekistan), and is developing projects in various geographic areas including North America, Latin America (Brazil, the Andes - Chile-Peru-Colombia), Africa (Morocco, Egypt, Cameroon, Côte d'Ivoire, Mozambique, Malawi, South Africa, Madagascar), and Asia-Pacific (in particular India, China, Australia and Vietnam).

EDF power solutions develops, builds and operates renewable and low-carbon energy generation resources as well as flexibility and electricity transmission solutions. It deploys solutions at the heart of the four pillars of Ambitions 2035: hydropower, onshore and offshore wind power, solar power, storage, thermal, networks and decarbonisation solutions (BtoB, BtoC, BtoG).

Active across the entire value chain, from project origination to operation and maintenance, through development, engineering, construction and asset management, EDF power solutions had an installed capacity of 33GW gross and 20GW net at 31 December 2025. Excluding Luminus, this capacity was 30GW gross and 18GW net (the net reflects the equity share held by EDF power solutions). EDF power solutions develops, builds and operates its assets with co-investor partners.

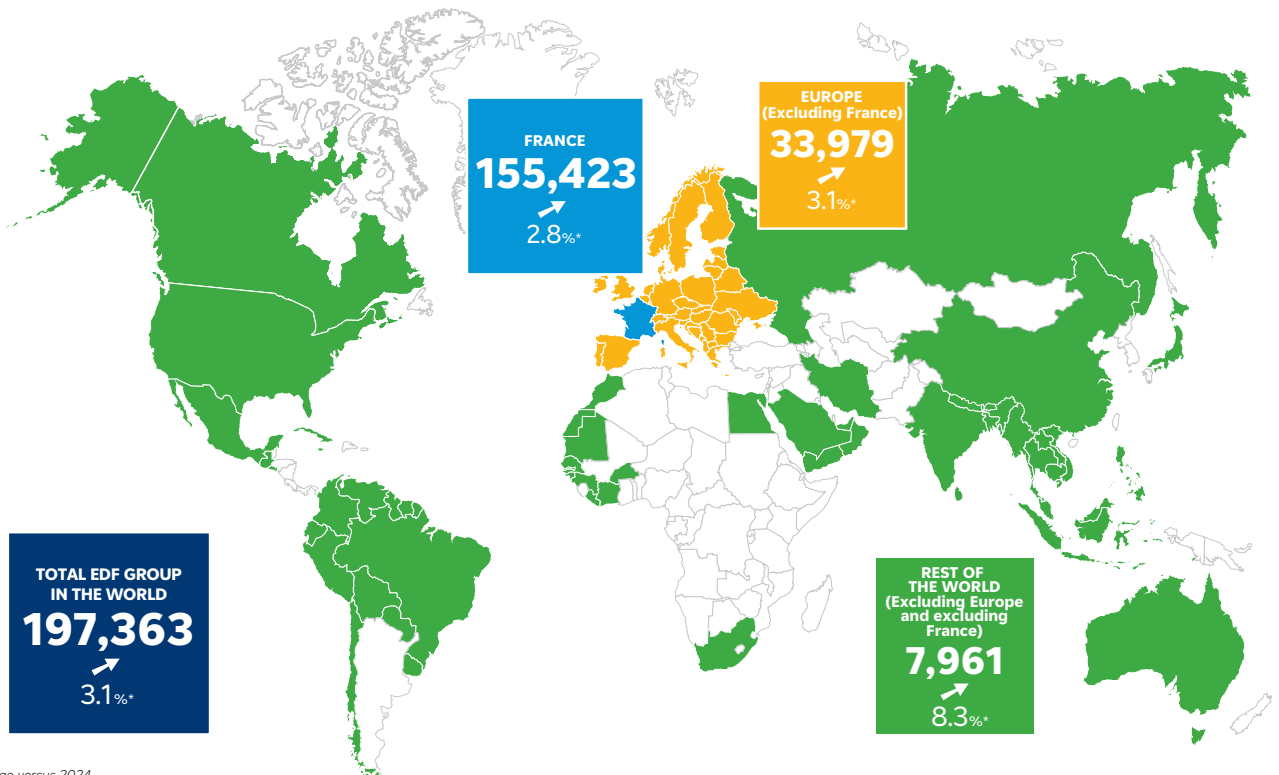
(11) Since February 2025, the activities of EDF Renewables, EDF's International Department and EDF's International Legal Department have been combined within the EDF power solutions entity.

EDF power solutions and Luminus' net installed wind power, solar power, hydropower, thermal and storage capacity[12] *(in %)*



The International Group's workforce

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



* *Change versus 2024*

(12) Net capacity: capacity corresponding to EDF power solutions' stake.

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% in the European Free Trade Association (EFTA) countries[13]).

Each subsidiary implements the **Group's Supplier and Procurement Policy** and organises its processes according to the principle of subsidiarity for Group subsidiaries. The suppliers of certain subsidiaries, or those involved in international projects, are subject to a specific vigilance system.

Given the primarily industrial nature of its activities, the Group must be vigilant as regards the risks of serious harm to the rights or health of people (employees, service providers, residents, local communities and customers) and to the environment prior to making investment decisions, particularly as regards the construction, operation, maintenance and decommissioning of facilities (see section 2.1 "Global actions to prevent and mitigate the risks related to the duty of vigilance").

18,000	95%	97.4%
TIER-1 SUPPLIERS	OF PURCHASES MADE IN FRANCE	OF PURCHASES MADE IN THE EUROPEAN UNION

Access the CSR Charter between EDF and its suppliers

Scope of the vigilance plan

The scope of the vigilance plan covers EDF's activities, the activities of its controlled subsidiaries[14], and the activities of its suppliers and subcontractors with which it has an established business relationship, insofar as their activities are connected to said relationship.

The Group's organisation is presented in section 4.1 "Group organisation".

The subsidiaries Dalkia and Framatome, who have over 5,000 employees, 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.

(13) European Union, Switzerland and the United Kingdom notably.

(14) Fully-consolidated subsidiaries that are included in the scope of consolidation as required by Article L. 233-16 II of the French Commercial Code (in France and abroad) (see note 3.3 "Scope of consolidation at 31 December 2025" to the consolidated financial statements for the financial year ended 31 December 2025).

1.3.2 *Duty of vigilance risk mapping methodology*

The identification and prioritisation of the risks used to draw up the vigilance plan are based on the Group's risk mapping exercise, which includes the risks relating to the duty of vigilance. An in-depth study of this risk mapping is specifically dedicated to the entities most exposed due to their activities and/or their location.

All Group entities carry out a risk mapping exercise, under the responsibility of management, using a typology aimed at covering all categories of risks that affect the Group, be they internal or external, operational or strategic.

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

In 2023 and 2024, an awareness campaign concerning the importance of the risk mapping for the duty of vigilance was directed to all the risk managers of the Group's entities. Risk mapping information was shared between the Group Risk Department and the Impact Department for a better approach to these risks. In 2025, the methodology dedicated to the duty of vigilance was integrated into the EDF group's methodological guide on risks.

This mapping comprises **five successive steps:**

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 identification of the risks follows 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 severity, assessed by reference to multiple criteria, including an assessment of their impact on the physical or human environment;
- **their probability of occurrence,** *i.e.* their degree of likelihood, assessed over an appropriate time horizon based on 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.

The assessment of the probability and severity of a risk requires the differentiation between gross and net levels:

- **the gross level** is the level taking into account all existing provisions tested against the Group's assets and therefore does not take into account the measures taken by the organisation to reduce the severity of the negative impact;
- **the net level** is the level that considers the effectiveness of the measures taken.

For the potential impacts, the rating considered is gross; for the actual impacts, the gross or net notion is not considered; the rating was carried out on the basis of the impacts observed.

Impact severity assessment methodology

In 2025, the method for assessing the severity of the impacts was specified in terms of magnitude, scope and irreversibility, as well as in terms of probability of occurrence. The scope of risk identification and the universe of risks to be considered during the risk analysis conducted in the various entities have also been detailed.

The risk is mainly assessed on the basis of the concepts of severity and probability of occurrence. As regards severity, the assessment must be determined according to three characteristics:

- **the magnitude** measures the intensity (severity) of the actual or potential damage or impact;
- **the scope** measures the extent of the impact, in terms of the number of people or populations affected, or in terms of the geographic extent of environmental impacts;
- **the irreversibility** measures the limits on the ability to return the affected persons or the environment to a situation equivalent to that which existed prior to the impact.

These characteristics may be exacerbated by the level of vulnerability of the populations concerned, vulnerability designating the susceptibility of an individual or group to suffer serious violations of their fundamental rights due to personal or contextual characteristics. It is associated with a reduced ability to protect oneself or assert one's rights.

Group's 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 the operational and functional entities.

The Group Risk Department 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 made it possible to clarify the consistency between the impacts, risks and opportunities (IRO) identified in the context of the CSRD and the main risks identified during the risk mapping. Overall, consistency has been achieved across all risk assessments conducted in the various contexts: Group risk mapping, CSRD and vigilance plan.

The risks specific to the duty of vigilance are presented by field in section 2 "Salient risks and risk prevention and mitigation measures":

- Salient risks relating to human rights and fundamental freedoms: see section 2.2.1;
- Salient risks relating to the environment: see section 2.3.1;
- Salient risks relating to human safety and health: see section 2.4.1;
- Salient risks relating to suppliers and subcontractors: see section 2.5.1.

1.3.3 Main improvements to the EDF group's vigilance plan in 2025

In 2025, several projects and actions were initiated or continued as part of a continuous improvement approach to the Group's vigilance plan.

Reinforcement of the methodology for mapping risks related to the duty of vigilance

In 2025, the EDF group's risk mapping methodology was specified in the section on risks related to the duty of vigilance. Thus, the risk severity assessment method describes the concepts of the magnitude, scope and irreversibility of these impacts, as well as aggravating factors such as the vulnerability of individuals.

Risk universes have also been integrated into the mapping methodology concerning the environment, human rights and personal safety and health.

Section 1.3.2 "Duty of vigilance risk mapping methodology"

Deployment of the supplier risk mapping for the Group's procurement network

The responsible purchasing approach is structured by the Group Purchasing Department, which sets the general framework and has managed the Group's purchasing network since April 2024 in compliance with the principle of subsidiarity of subsidiaries' governance and the management independence of the network operators.

In this respect, the risk mapping of each entity in the procurement network feeds into the Group's vigilance plan. In 2025, these risk maps were consolidated, enabling the presentation of EDF's main purchasing categories, extended to Dalkia, Framatome and EDF power solutions.

Section 2.5.1 "Identifying salient risks"

Integration of the duty of vigilance in the third-party assessment instruction

The third-party assessment procedure, deployed in 2025,[15] consists of identifying, prioritising and controlling the potential risks to the company arising from its relationship with each of its third parties (suppliers, customers, project partners, intermediaries, organisations benefiting from sponsorship, M&A counterparties, etc.). This procedure specifies that the assessment of third parties, in addition to limiting the Group's exposure to the specific risk of corruption, also contributes to the control of risky practices, notably in terms of the duty of vigilance. The business partner may not carry out any activities that entail a risk of serious harm to human rights, fundamental freedoms, the safety and health of people, or the environment.

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

Duty of Vigilance Managers are appointed in every Group entity, selected based on their duties in matters relating to CSR, ethics, compliance and/or internal control. Four meetings of the network of Duty of Vigilance Managers took place in 2025, focusing mainly on the following:

- the presentation of the Group's third stand-alone vigilance plan for 2024 and the Group's new global CSR agreement;
- the sharing of the establishment of vigilance procedures by certain Group subsidiaries and entities, such as EDF power solutions;
- the presentations on the EDF group's work on harassment and discrimination, as well as on the associated disciplinary sanctions;
- the human rights risks associated with the various minerals around the world;
- the regulatory watch: developments in the draft directive on the duty of vigilance of companies in terms of sustainability, the Omnibus Directive, as well as the ongoing disputes in France relating to the duty of vigilance.

In 2021, the Group developed an e-learning module dedicated to the duty of vigilance, to raise the awareness about and support the deployment of the Group's vigilance plan. In 2024, this e-learning module, as well as the one on human rights, was made available to the members of EDF's Board of Directors, as part of the new "CSR" training offering on the new e-learning platform.

4,200 employees

COMPLETED THE E-LEARNING MODULE ON THE DUTY OF VIGILANCE BY THE END OF 2025 (COMPARED WITH 3,000 AT THE END OF 2024)

These actions in 2025 were part of a year-round improvement process based on a regularly reviewed action plan.

(15) Instruction replacing the previous note on "Business relationship integrity control".

Salient risks and risk prevention and mitigation measures(16)

(16) The elements of the annual report are included in the corresponding prevention and mitigation measures.

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

The risk prevention and mitigation measures are implemented by each entity concerned, through the application of cross-functional and sector-specific policies and on the basis of the Group's common risk management methodology, which provides for the description of risk treatment action plans and an assessment of their effectiveness.

Project assessment procedure

Industrial projects are subject to risk analyses covering the scope of application of the duty of vigilance, taking into account their nature, size, technical features and location. Within this framework, the environmental and social impact studies for projects located in non-OECD countries are based on the most demanding **international standards** (mainly those issued by IFC, WB and ADB [17]).

Furthermore, in 2025, as in previous years, the issues relating to the environment, personal safety and health, and human rights were addressed in the analysis of the projects submitted to the **Group Executive Committee's Commitments Committee**, in the form of a listing of the risks associated with the projects, in order to ensure that EDF's commitments in this area are taken into account. 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, safety and health, human rights and ethics issues. In the milestones prior to the Group Executive Committee's Commitments Committee, these aspects are examined in the project validation bodies specific to each entity.

For certain projects, when the corresponding risks so require, 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.

Furthermore, within the framework of partnerships, major projects, external growth or investment operations, the EDF group regularly engages in share subscription or acquisition operations concerning French or foreign entities. A methodological guide listing the various due diligence actions to be carried out in terms of ethics and compliance, and providing practical guidance for their implementation, has been deployed within the Group. These due diligence actions are based on the Ethics and Compliance Policy, which covers the Group's compliance programmes, including the duty of vigilance. This guide proposes a series of actions to be implemented at each stage of project (*e.g.* acquisition or partnership) in a chronological and gradual manner according to the level of risk identified at each stage of the project.

(17) IFC: International Finance Corporation. WB: World Bank. ADB: Asian Development Bank.

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 the salient risks and the associated mitigation measures with regards to the Group's activities and the countries in which it and its subsidiaries operate.

Since 2021, the Group has used the Verisk Maplecroft® human rights indices to refine and further specify the human-rights risks that the Group may face in the countries where it operates, makes purchases and develops its activities.

Salient risks relating to human rights and fundamental freedoms

Risk category	Salient risk	Geographic area	Risk criticality	Negative material impact
Cross-cutting	Risks of harassment and discrimination.	Global	■	**ESRS S1** Own workforce **ESRS S2** Workers in the value chain
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
	Risks of inadequate consultation with local communities, particularly indigenous communities.	Central and South America, Southeast Asia, India and Africa	■ ■	**ESRS S3** Affected communities
	Risks related to the use of security forces.	Areas near conflict zones or authoritarian regimes	■ ■	**ESRS S3** Affected communities
	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 Gulf countries Europe, North America and Australia	■ ■ ■ ■ ■	**ESRS S1** Own workforce **ESRS S2** Workers in the value chain
	Risks of forced labour by subcontractors.	Gulf countries, South-East Asia	■	**ESRS S2** Workers in the value chain

Criticality: ■ ■ ■ high ■ ■ intermediate ■ moderate

2.2.2 *Principal prevention, mitigation and monitoring measures implemented*

The implementation of human rights commitments is part of the deployment of the global master agreement on the Group's social and environmental responsibility and its reference framework (see section 1.1.4).

In 2021, the EDF group published a document[18] listing the Group's commitments and the fundamental requirements regarding its business partners in terms of human rights and fundamental freedoms, environmental protection, protection of personal safety and health, and business ethics. These EDF group human rights commitments were approved and signed by the Chairman and Chief Executive Officer.

2.2.2.1 Human rights commitments

Compliance with international standards

The EDF group does not tolerate any infringement of human rights and fundamental freedoms, either in its own activities or in those of its business partners when their activities relate to EDF.[19]

Our various human rights commitments online

International standards

In accordance with the United Nations Guiding Principles on business and human rights (UNGP), the EDF group undertakes to respect, at the very least, the international standards for the protection and defence 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 Taskforce on Inequality and Social-related Financial Disclosures (TISFD) 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 solutions that ensure compliance with both the spirit of the international standards and the 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 risk of 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 pays special attention to the impact of its operations on individuals recognised as vulnerable[20] under international human rights law, and investigates, in complete transparency, impartiality and good faith, any alleged infringements of human rights or fundamental freedoms related to the operations of the Group's entities, service providers and subcontractors.

Proven cases of injury

If an infringement of human rights or fundamental freedoms is proven within the framework of 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 to which the EDF group adheres.

(18) www.edf.fr/sites/groupe/files/2023-02/edfgroup_rse_referentiel-ddv-2021_en.pdf
(19) www.edf.fr/en/the-edf-group/taking-action-as-a-responsible-company/corporate-social-responsibility/well-being-and-solidarity/human-rights
(20) Vulnerable individuals, groups and communities are those who face a particular risk of being exposed to discrimination and violations of their human rights. People who are disadvantaged, marginalised or excluded from society are often particularly vulnerable. International law grants them special protection, through specific treaties.

The rights of employees

The EDF group is committed to respecting human rights and fundamental freedoms by complying, as a minimum, with the standards of 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 and interns 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, notably, 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 EDF group's Global Agreement on Social and Environmental Responsibility, the EDF group undertakes to respect and protect the autonomy and independence of trade unions, in compliance with the laws and regulations in force. 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 his or her 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's standards as well as with all applicable laws and regulations on working hours in all countries where it operates.

Compensation, working conditions, and employee 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.

In 2025, all Group employees received a decent wage, in accordance with the applicable benchmarks.

Respect of safety and health for all

To tackle the industrial and commercial challenges it faces, the Group must remain a socially responsible and committed employer and customer and a benchmark in terms of safety and health.

The safety and health of all, be they employees, interns or subcontractors, is the EDF group's top priority, which includes environmental health, the development of air quality, the reduction of noise, visual or light pollution, and commercial offerings related to comfort and well-being. The Group's entities comply with the highest standards defined in the nuclear safety policy, the hydropower safety standards and the Group's safety and health Prevention Policy. Lastly, every new project is analysed from the point of view of the safety and health of the people involved, and with regard to its impact on the environment and health of local residents.(21)

The Group's safety and health Prevention Policy was updated in November 2025 and is based on a commitment jointly signed by the Chairman and Chief Executive Officer and all the members of the Executive Committee. This Group policy applies to all the companies controlled by the EDF group, in all the countries in which EDF operates, and to everyone. It concerns its employees, its interns and its subcontractors.

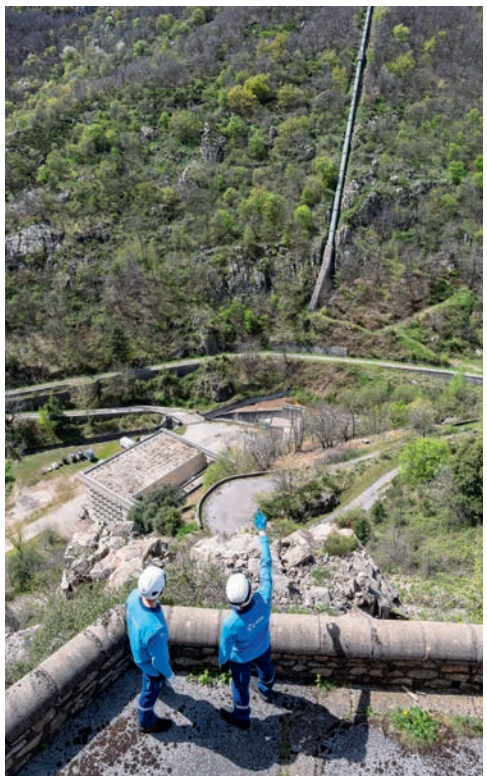
The policy's priorities are, first and foremost, to eradicate fatal and serious accidents, reduce the overall number of accidents and combat absenteeism, and improve the physical and psychological health of employees at work. The policy aims to anchor throughout the Group the foundation formed by the Group's life-saving rules and the BEST safety and health management reference framework.

EDF's Executive Committee reviews safety and health figures and monitors action plans regularly. A Group Strategic safety and health Committee oversees the implementation of the policy.

EDF is committed to improving the physical and psychological health of its employees and subcontractors, placing the absolute priority on protecting them and eradicating fatal and serious accidents.

In line with the steps taken at the Group to eradicate serious and fatal accidents, our policy aims to develop a collective safety requirement supported by both Group and subcontractor employees. It reinforces the progress made in collaboration with our service providers by promoting joint actions in the field, such as joint visits and the signing of charters.

(21) See in notably the BEST requirements guide for the EDF group for Safety and Health Management, and its self-assessment tool.



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 discussions and consultations for every 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 defenders caused by its business operations and allows them to speak freely about its operations.

The EDF group identifies, for every 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, ILO Convention 169 and the World Bank standards. In particular, the 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 Free Prior and Informed Consent (FPIC) 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.

2.2.2.2 Preventing and combating discrimination and harassment at work

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.

The Group Ethics and Compliance Policy (PECG) lists the Group's compliance programmes and the main rules that managers must know, comply with and enforce within their entities, in strict accordance with the risks faced by those entities. This policy was updated in June 2023. It also includes the harassment and discrimination prevention programme.

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.

Group's Ethics and Compliance Policy

As part of its Corporate Social Responsibility commitments, the global CSR agreement, the Ethics Charter and its agreements promoting diversity and disability inclusion, the EDF group is committed to setting targets for professional equality between men and women, measuring progress and implementing appropriate measures. The EDF group's gender equality and equal pay policy includes principles such as equal treatment for men and women throughout their working lives, condemnation of any behaviour or practice that discriminates against employees, EDF's contribution to changing attitudes, and zero tolerance of sexist and sexual harassment in the workplace.

2.2.2.3 Actions related to gender balance

Strengthening the EDF group's gender balance goals

In terms of professional equality, in 2021 the Executive Committee decided to strengthen the Group's gender balance goals set in 2019.

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

- **1st area:** Break the glass ceiling, at all hierarchical levels, and accelerate the feminisation of executives

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 by the end of 2030.

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

The EDF group wishes to develop 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).

- **3rd area:** Ensure non-sexist communication, promote gender balanced representation

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

A TARGET OF INCREASING THE NUMBER OF WOMEN ACROSS THE GROUP WAS SET IN 2021, COMMON TO ALL HIERARCHICAL LEVELS.

Between 36% and 40%

IN 2030

Changes in the professional gender equality index

In 2025, EDF published a performance of 95 points out of 100 on the gender equality index.

	Published in 2023 in respect of 2022	Published in 2024 in respect of 2023	Published in 2025 in respect of 2024
Professional gender equality index (EDF)[1]	90/100	95/100	95/100

(1) Publication of the index before 1 March N+1 for year N, definition regulated by the French Ministry of Labour, Full Employment and Integration.

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 recognising their cognitive biases, gender stereotypes and inclusive management. Work is underway to incorporate gender equality considerations into the managerial projects of entities.

Percentage of women among the Group's senior executives

As of 31 December 2025, the EDF group employed 317 women senior executives, representing 28.0% of the Group's senior executives (compared to 26.7% at the end of 2024). This increase reflects the improving gender balance among EDF SA's senior executives, and is also driven by the Group's subsidiaries in France and internationally.

Diversity, and notably gender balance, among executives and future executives are essential drivers of the Group's transformation. The target of 40% women among the Group's senior executives, including in its subsidiaries abroad, is particularly ambitious in terms of time, notably for an industrial group that does not have a sufficient pool of women in the short term to achieve this objective. However, the numerous actions aimed at promoting gender equality allow for a gradual increase in the percentage of women within the company.

Sustainability issues	Target	Reference	Review	Scope	2024	2025
Gender balance	40% of women among the Group's senior executives by the end of 2030	Validation of the Executive Committee	Annually	Group	26.7%	28.0%

Consequently, in 2023 EDF updated its action plan to foster diversity among senior executives in order to address this specific issue.

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

- increasing accountability among senior executives 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 senior executive positions in the appointment bodies;
- establishing an Annual Career Committee (People Review) dedicated to women, notably potential future women senior executives;
- strengthening and expanding the existing specific support for future senior executive women (mentoring, coaching, co-development, leadership discovery);
- 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 senior executives or future senior executives outside the company to further increase the representation of women in the pool.

Gender mix of the Board of Directors

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

Pay

Pay gap	2024	2025
% of pay gap between women and men	1.8%	1.7%

The gender pay gap refers to the difference in the average level of pay between male and female employees, expressed as a percentage of the average pay level of male workers.

The calculation of this indicator is based on a representative scope of the EDF group's workforce, including the employees present continuously in France (EDF SA, Enedis, Framatome, Dalkia) and in the United Kingdom (EDF Energy), *i.e.* approximately 80% of the global workforce.

The remuneration taken into account includes the basic salary as well as all benefits in cash and in kind.

2.2.2.4 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 harassment. Each employee, regardless of their level of responsibility, must be able to feel considered, respected and protected.

At EDF, a toll-free listening and advice hotline is available seven days a week for all Group employees, including for possible situations of harassment or discrimination.

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

- engage in live dialogue with employees on gender diversity and 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 Centre Hubertine Auclert's "violentometer"[22] ("violentomètre") 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 has been included in the professional equality agreements of EDF SA since 2017, and is included in those of RTE (2020), Enedis (2021) and EDF power solutions (2023). It took on an industry-wide dimension with the Professional Equality Agreement for the Electrical and Gas Industries (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 2025, the EDF group took charge of, assisted, backed and guided 182 new cases (164 in 2024) of employees who were victims of domestic and intra-family violence, representing nearly 1,000 employees (903 women and 96 men) assisted between 2019 and December 2025.

Actions and systems widely deployed at EDF

To implement and deploy its initiatives and measures, EDF relies on a network of Human Resources Correspondents within the company, which enables it to more effectively address gender equality issues by adapting them to very different professional environments depending on the business line and region, while offering awareness-raising and training initiatives tailored to stakeholders (employees, managers, HR, employee representative bodies, etc.).

In 2025, EDF participated in the Sexism Barometer, in partnership with other StOpE member organisations and the IPSOS polling institute, to assess the perceptions of gender-based and sexual violence in the workplace.

EDF ensures the professionalisation of SEC focal points on sexist and sexual behaviours at work, and uses innovative tools such as virtual reality and micro-learning to raise awareness among its employees.

999

EMPLOYEES VICTIMS OF DOMESTIC AND INTRA-FAMILY VIOLENCE ASSISTED BETWEEN 2019 AND DECEMBER 2025.

(22) https://www.centre-hubertine-auclert.fr/egalitheque/publication/le-violentometre

2.2.2.5 Support for parenthood and caregivers

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, as follows:

- 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.

2.2.2.6 Disability plan, a long-standing commitment

EDF pays particular attention to the integration and quality of life of its employees with disabilities and works to improve the career opportunities for these employees with the aim of allowing real equality of opportunity and preventing all forms of discrimination.

EDF is one of France's leading companies involved in the professional and social integration of people with disabilities, and its commitment goes well beyond the legal requirements. Its action is part of EDF's 12th agreement on equal rights and opportunities and professional inclusion for people with disabilities, signed in 2023.

At the sports level, this commitment has been reflected since 1992 by the partnership with the French Handisport Federation.

The EDF group strives to embrace all skills and energies, without exclusion. The number of BOETH employees increased by 11% in 2025 to 8,961 employees.

Employees with disabilities

Group indicators	2023	2024	2025
Number of employees with disabilities	7,054	8,096	8,961
% of employees with disabilities	3.9%	4.2%	4.5%

2.2.3 *Preventing and mitigating risks related to the Group's international activities and projects concerning violations of the rights of workers and communities*

2.2.3.1 At the project management level

The EDF group does not tolerate any infringement of human rights and fundamental freedoms, either in its own activities or in those of its business partners when their activities relate to EDF.

Depending on the context of the project, an HRIAM[23] study 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 "rights-holders" and "duty bearers"), an analysis of the project's impacts on these rights, and 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 are managed by EDF's internal human rights contacts. The conclusions of these studies are 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 contacts 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.

In operational terms, a large number of projects are being developed internationally, notably by EDF power solutions.

In 2025, the activities of EDF's International Department and those of EDF Renewables were merged into EDF power solutions. This reorganisation meets two main objectives: (i) implement more effectively the Group's low-carbon energy activities (excluding nuclear and hydropower in France) and flexibility solutions, in line with the goals of the "Ambitions 2035" corporate plan and with the evolution of the market; (ii) make the Group's organisation more efficient and understandable internationally for all external and internal stakeholders.

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

1. During 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 actions can also be carried out for particular sectors with identified risks.

2. During the development phase

Depending on the country risks identified and the specific features of the project, a Human Rights Impact Assessment and Management (HRIAM) study may be launched, in order to:

- clarify the human rights context in the project area, in relation to the 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[24]) for the construction of major infrastructures, such as hydropower, solar power and wind farms, but also for smaller contracts, such as photovoltaic generators for commercial and industrial (C&I) customers, notably in sub-Saharan Africa;

4. During the construction phase

Grievance mechanisms and complaints management systems are set up for workers and communities (in addition to the systems provided by EDF and any donors or lenders).

(23) HRIAM – Human Rights Impact Assessment and Management.
(24) EPC contract: Engineering Procurement and Construction: www.cmr-group.com/contrat-epc

2.2.3.2 Actions concerning workers' rights

The Group implements concrete actions to ensure respect for workers' rights and decent working and housing conditions in its projects.

Amaala project: integrated tourist complex in Saudi Arabia

The Amaala project, located in Saudi Arabia, aims to develop and operate an integrated tourist complex, including the autonomous management of drinking water, wastewater and electricity generation.

EDF and its partners are responsible for the implementation of the water treatment and energy generation infrastructures, mainly using solar panels and battery storage systems. At its peak in May 2025, the site involved more than 4,000 people. The project is backed by Saudi and international donors, and meets rigorous environmental, social, and safety and health standards, aligned with IFC standards.

The site is located about 75 km from the nearest city, connected by dilapidated road infrastructures. In addition, the behaviour of drivers is characterised by risky conduct that is rarely monitored or penalised by the authorities, thus increasing the risk of accidents. The development of the tourism complex is taking place in an environment that is still relatively undeveloped, with limited local capacity to accommodate a growing population, notably in terms of housing and essential services. The project spans several coastal and inland areas, connected by asphalt roads or tracks. During the development phases, these challenges were identified and several workers' housing units were built or renovated in line with international best practices. Road safety has been enhanced through employee training.

In terms of preventing heat-related illnesses, the project created air-conditioned rest shelters and monitored environmental conditions through the WBGT system (heat stress meter). Enhanced monitoring of the supply chain is carried out by the EPC, in collaboration with the project company, covering areas such as living conditions, food, human resources practices, etc. EDF power solutions, in collaboration with its partners, set up a monitoring of these actions *via* a dedicated HSSE committee and audits.

The lessons learned from Amaala and other projects in the region have also been incorporated into the dedicated contractual clauses template for future projects, and a seminar on fair recruitment practices was organised in September 2025.

Operating activity: Acquisition of US Chillers

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 safety and health audit was carried out in 2023. This entity has around 330 employees outside the United States, 99% of whom are migrant workers. A diagnosis of the working, safety and health conditions has been undertaken. The following measures have also been implemented: work to bring into compliance the collective housing for workers in Dubai and Bahrain, and establishment of a minimum wage. In 2025, Dalkia continued its prevention and audit actions relating to employee health, safety and living conditions. Several events have been organised to contribute to the workers' welfare:

- In Saudi Arabia, Dalkia works with two main subcontractors. Dalkia's teams hold regular meetings on working conditions and continuously check compliance with them, notably the validity of residence permits and employment contracts, as well as the compliance of health insurance, for example.

  Two audits on the housing of these subcontractors were carried out in 2025 with several findings: improvement in cleanliness, hygiene checks carried out, maintenance of washing machines and showers conducted, verification of first aid kits, improved access to water, reduced number of occupants per dwelling, protection against electrical risks implemented.

  With regard to one of the subcontractors, the relocation of staff accommodation is planned for 2026, with a control audit scheduled.
- In 2025, Dalkia Middle East took part in numerous events to contribute to the quality of work and life of employees, including a working group organised on best practices in terms of shared working conditions among French companies operating in the area. Dalkia Middle East's employees were also able to benefit from safety prevention training carried out at all sites, medical consultations in Dubai with doctors, and sports sessions organised at rented facilities.
- Lastly, the ISO 9001, 14001 and 45001 certifications of the Dubai, Bahrain and Qatar entities were finalised in 2025.

2.2.3.3 Actions concerning local communities

At the international scale, projects development includes a Stakeholder Engagement Plan (SEP), which consists in identifying relevant stakeholders and determining, informing and collecting their opinions, answering to them, and involving local and indigenous communities throughout the life cycle of projects.

Nachtigal project: hydropower plant in Cameroon

In Cameroon, the Nachtigal project, including the construction of a 420MW hydropower plant, launched in 2019 and commissioned in March 2025, deployed a stakeholder engagement plan (SEP) covering all phases of the project.

The main stakeholders identified are: PAPs (people affected by the project - farmers, fishermen, fishmongers, operators, sand miners), young people, women, decentralised local governments, district chiefs, traditional authorities (village chiefs, dignitaries), local communities, ministries and school officials.

The SEP included various stakeholder engagement strategies:

- information and consultation meetings for the people affected by the project, vulnerable people, leaders of local organisations, village leaders, mayors and school managers;
- awareness-raising meetings on safety and health topics for schools, local associations and companies;
- targeted campaigns (by phone, SMS, e-mail) focusing on 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

At the international level, each project sets up a request and complaints management mechanism (RCMM). Systems for collecting and processing complaints, alerts, reports and claims have been set up at Group level[25] and are accessible for each project. These systems are accessible to any person potentially impacted by the Group's activities and guarantee the confidentiality of alerts and whistleblowers. In addition, systems for collecting and processing questions are also set up locally.

Mpatamanga project: hydropower plant in Malawi

In Malawi, the consortium in which EDF participates is developing the Mpatamanga project to build a 361MW hydropower plant, launched by the government, which began in 2022 with commissioning scheduled for 2030. This project has a requests and complaints management mechanism allowing stakeholders to submit their requests, complaints and questions to the project company Mpatamanga Hydro Power Limited (MHPL), 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 Group Village Grievance Redress Committee - GVGRC);[26]
- by phone, SMS or WhatsApp;
- by post or email.

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

- complaints are handled according to the standard request and complaint management procedure described in the diagram below;
- incidents are handled according to the Environmental, Social, safety and health (ESHS) incident resolution procedure;
- gender-based violence, harassment, sexual exploitation and abuse are addressed through the Gender-Based Violence (GBV) procedure;
- questions, remarks and comments are addressed according to the QCC (Questions, Comments & Concerns) management process. MHPL informs stakeholders of the existence of this mechanism through the GVGRCs on the ground as well as through the dissemination of information to community cinema and other media. Since the start of the project, 37 complaints have been received, of which 34 have been resolved and three were still in the process of being resolved at the end of 2025.

(25) www.edf.fr/en/the-edf-group/taking-action-as-a-responsible-company/ethics-and-compliance-programme/whistleblowing-system

(26) Group Village Grievance Redress Committee (GVGRC): committee formed at the village level involved in managing complaints from communities impacted by the project. A GVGRC 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.

KIKOT-Mbebe project: hydropower facility in Cameroon

As part of the KIKOT-Mbebe hydropower facility project in Cameroon, whose construction is expected to start in 2026, a specific process has been put in place to allow the affected communities to express their concerns. This process includes the creation of a platform dedicated to civil society organisations (CSOs), with 21 organisations active in the following areas: protection of the rights of communities living near projects, promotion of health, gender and the fight against gender-based violence, local development, protection of natural resources, preservation of the tangible and intangible cultural heritage of communities.

For example, the Green Development Advocates (GDA) CSO carries out awareness-raising actions with the communities impacted by the project, with their feedback mainly focusing on:

- the scope of the project and potential delimitation errors during the work of the cadastral commissions;
- the threats that some of the representatives of the affected communities may face;
- an analysis of the mechanism for managing requests and complaints.

Following this feedback, actions were implemented in collaboration with GDA:

- on-site verification of the project's footprint and confirmation of cadastral data;
- the launch of a process for reviewing the project's requests and complaints management mechanism;
- raising awareness among the project teams on the protection of whistleblowers and human rights and environmental defenders.

As regards the Global Village Cameroon (GVC) CSO, community awareness raising on involuntary resettlement was carried out through the production and distribution of a documentary film in the affected villages. The project provided financial support of 70% without interfering in this action, in order to guarantee the independence of the CSO.

Sustainability issues	Indicator	Target	Reference	Review	Scope	2024	2025
Dialogue and consultation with stakeholders	Annual rate of projects for which a dialogue and consultation process is engaged	100%	2021	Annually	Projects of over €60 million examined by the CECEG	100%	100%

Details on the indicator:

Projects for which a dialogue and consultation process is undertaken with stakeholders are those that have a significant impact on the regions or the environment through prior studies: regional diagnostics, impact studies, etc.

2.2.3.4 Pending litigation in Mexico

In 2018, an NGO made a complaint to the OECD's French national contact point (NCP) about the planned Gunaa Sicarú wind farm, managed by a subsidiary of EDF power solutions[27] in Mexico.

As part of the OECD mediation process led by the French NCP, the EDF group participated in two dialogue meetings with the complainants, providing responses to the points raised. In the spring of 2020, the NCP closed the referral and on 12 July 2022 it published a press release noting the reinforcement of EDF's corporate policy and the work EDF had carried out on human rights, as well as on its engagement with stakeholders. As these measures complied with its recommendations, the NCP ended its monitoring of the matter.[28]

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

At the same time, in December 2019, EDF responded to a formal notice, issued under the duty of vigilance law, relating to this project, sent by this NGO and four natural individuals. EDF was then served with a summons on 13 October 2020 to appear before the Paris Court (*Tribunal Judiciaire*). The claimants requested, on the one hand, that the vigilance plan established by EDF be modified to better taken into account the risks of infringement of the rights of indigenous communities and, on the other hand, that compensation be paid for the damage caused by EDF's alleged failure to fulfil its duty of vigilance. EDF contests both claims. On 30 November 2021, the pre-trial judge rejected the associations' request to suspend the project on a precautionary basis, as well as their request for an injunction concerning EDF's 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 its deliberations on 18 June 2024, the new 5-12 Chamber of the Paris Court of Appeal, responsible for "emerging litigation", overturned the judge's order. Notably, the court considered that the formal notice must clearly identify the alleged breaches, and that the summons in question may relate to a different vigilance plan than the one 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 related not to the obligations of EDF SA, in terms of its duty of vigilance, but to the project itself, which is a matter subject to Mexican jurisdictions. No urgency or imminence of future harm had been demonstrated. The case was referred to the Paris Judicial Court on the merits and is expected to be examined in 2026. The case is still pending before the Paris Judicial Court.

On 20 January 2026, EDF power solutions Mexico announced that it was putting an end to the development process for the Gunaa Sicarú wind power project. Although EDF power solutions Mexico had a supply contract for the sale of electricity, as well as the necessary generation and interconnection permits, the project faced obstacles leading to its termination, mainly the following:

- the cancellation by the Mexican government of the direct current transmission line, a critical infrastructure for connecting the project to the national electricity grid;
- the cancellation by the Mexican Federal Electricity Commission[29] of the supply contract for the sale of electricity.

All information is available on the website dedicated to the project**: www.gunaa-sicaru.com**

(27) EDF Renewables until February 2025.
(28) https://www.tresor.economie.gouv.fr/Institutionnel/Niveau3/Pages/8fd9ecb1-2cb5-4e35-95b7-587b6793f341/files/f28dc42f-543f-46c1-8f32-b1d029b363d5
(29) Comisión Federal de Electricidad.

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. Each entity defines action plans to reduce and control its risks on the basis of its risk mapping.

The 2025 update to the risk mapping confirms the 2024 risk analysis, and does not highlight any new environmental risks. The risks related to thermal discharges into water, as well as radioactive discharges into water and air, are not considered salient following the materiality analysis, which can be consulted in section 3.2.3 "ESRS E2 – Pollution" of the 2025 Universal Registration Document.

Salient environmental risks

Salient risk	Generation activities most exposed	Risk criticality	Negative material impact
Greenhouse gas emissions with effects on the climate:			
• **Direct emissions** (Scope 1)	• Electricity and heat generation from fossil fuel	■ ■	**ESRS E1** Climate change
• **Indirect emissions** (Scope 3)	• Purchasing (upstream in the value chain) • Supply of gas and electricity, electricity generation by non-controlled plants (downstream of the value chain)	■ ■	
Discharges with potential effects on:			
• **air quality**: discharges into the air (mainly SO_2, NO_x and dust) occur through thermal combustion. In addition, discharges with potential effects on air, water, and soil may occur through possible operating incidents as well as in the Group's upstream value chain.	• Electricity and heat generation from fossil fuel	■	**ESRS E2** Pollution
Consumption with potential effects on:			
• **raw material resources**: notably raw materials used for building new facilities, and waste generation.	• All types of electricity generation (nuclear, thermal, hydropower, wind and solar power)	■ (existing production and decommissioning) ■ ■ (projects)	**ESRS E4** Biodiversity and ecosystems **ESRS E5** Resource use and circular economy

Salient risk	Generation activities most exposed	Risk criticality	Negative material impact
• **waste generation**: the construction and decommissioning activities, as well as the operation of electricity and heat generation facilities, generate various types of waste, which must be treated, recycled or stored.	• All types of electricity and heat generation (nuclear, thermal, hydropower, wind and solar power)	■	**ESRS E5** Resource use and circular economy
• **freshwater resources**: the use of freshwater (withdrawal and consumption) for the cooling system of nuclear and thermal power plants and for industrial processes, as well as in the Group's upstream value chain, may impact water availability.	• Electricity generation by thermal power plants (nuclear, fossil fuels)	■ ■	**ESRS E3** Water resources
Potential impacts on ecosystems:			
• **ecosystem degradation**: the artificialisation of soil, caused by the Group's construction, decommissioning and operating activities, can lead to the degradation of ecosystems. The activities of the hydropower sector can also contribute to the latter through the modification of hydrological regimes.	• All types of electricity generation (nuclear, thermal, hydropower, wind and solar power)	■ (existing production and decommissioning) ■ ■ (projects)	**ESRS E4** Biodiversity and ecosystems
• **overexploitation of upstream natural resources:** the construction and operation of energy generation infrastructure requires resources from mining, fossil fuels and various raw materials, which can lead to the destruction or alteration of ecosystems.	• Electricity and heat generation, notably from biomass	■ ■	
• **biodiversity loss**: the Group's construction/decommissioning activities, as well as its operating activities, may lead to a loss of biodiversity (*e.g.* bird strike/electrocution, modification of fish continuity).	• Electricity generation by nuclear, thermal, hydropower, wind and solar power	■ ■	

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

2.3.2 *Principal prevention, mitigation and monitoring measures implemented*

To prevent and mitigate risks of serious harm to the environment, EDF relies on its environmental management system (EMS) and its CSR policy, which commit its entities to a precautionary and 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.

Environmental assessment procedure

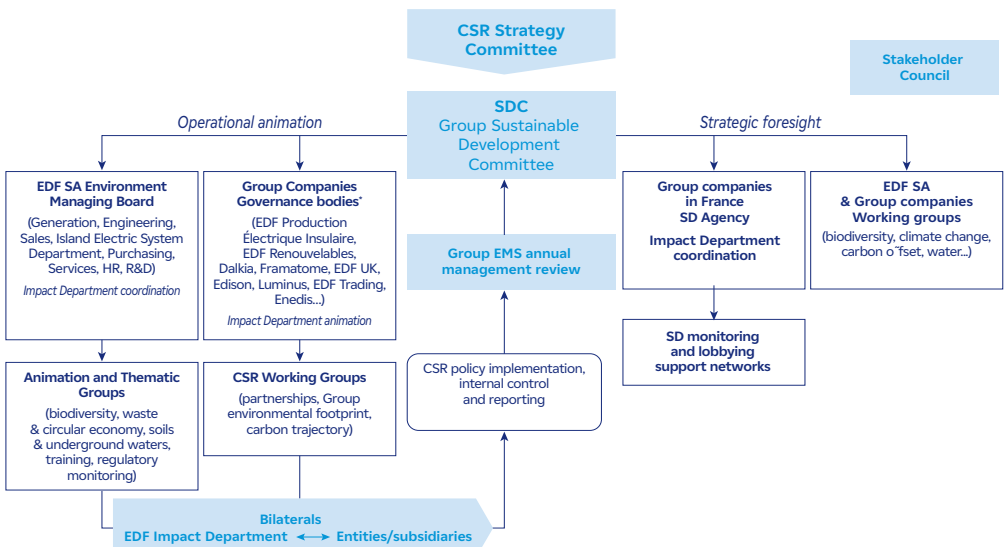
Pursuant to the requirements of the **CSR policy**, every Group entity[30] and project implements an environmental management approach adapted to its own challenges, and defines its organisation and the various levels of responsibility and authority associated with it, in order to meet its environmental commitments and control its risks by providing appropriate resources (human and financial).

The EMS operates through the Group processes of the entities and business lines, to give stakeholders formal assurance that:

- the environmental risks are under control and the EDF group complies with regulations and its commitments: every entity draws up and implements an environmental programme or action plan that takes into account the relevant Group commitments, its own significant environmental aspects and its regulatory obligations, and considering its risks and opportunities;
- the Group's organisational efficiency is being improved in a way that is appropriate to the challenges faced: every entity is responsible for its own internal control, internal and external audits of its EMS, and for its interfaces with the Group's EMS;
- the entities' environmental activities are the subject of mandatory non-financial reporting: every entity collects and communicates the required environmental information to the Impact Department.

The Group's EMS is certified compliant with the ISO 14001 international standard by an external body, the French standards agency AFNOR. All industrial sites are covered by an EMS, and more than 80% are covered by a certified EMS. The latest certification audit campaign, conducted by AFNOR over the period from the beginning of April 2024 to the end of May 2025, confirms that the certified EMS implemented by the entities and subsidiaries are effective, relevant, mature and enable the improvement of performance in all areas of the environment.

Governance of the EMS



** Environment managing boards or equivalent*

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

2.3.2.1 Preventing and mitigating climate impacts

2.3.2.1.1 Policies related to climate change mitigation

Faced with the climate emergency and in line with its raison d'être, the EDF group wants to develop a new energy model that emits less CO_2, is more efficient and is more respectful of the environment and people. 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 High Level Expert Group on the Net-Zero Emissions Commitments of Non-State Entities (UN HLEG).

A "Net Zero emissions" ambition supported by an ambitious carbon trajectory

EDF

No. 1

GLOBAL PRODUCER OF ELECTRICITY WITH NO DIRECT CO_2 EMISSIONS

The EDF group is the world's leading producer of electricity with no direct CO_2 emissions. As a ration of its production volume, the CO_2 emissions of the Group are much lower than those of other major electricity producers. In line with this leading role in decarbonising the economy, as well as its raison d'être, the EDF group has set itself the goal of achieving "Net Zero emissions" across all its activities by 2050. This target covers the greenhouse gas emissions across all scopes (1, 2 and 3)[31] and all geographic regions.[32] It is based on the definition included in the CSRD.[33] The Group's Net Zero goal is linked to the CSR policy, for which the Impact Department is responsible, and to the "Ambitions 2035" corporate project. The results are presented to the Executive Committee annually.

Net Zero by 2050	Goal of reducing the Group's direct greenhouse gas emissions to zero or virtually zero by 2050
	Goal of reducing direct and indirect emissions by at least 90%[1]
	Goal of 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).

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 (see the section "Targets and indicators related to climate change mitigation").

These targets relate to the Group's direct and indirect emissions. In addition to the monitoring of the Group's emissions, the definition of the carbon trajectory contributes to the orientation of its strategic choices and investments.

(31) For the definition of the three scopes, see section 2.3.2.1.3 point 1. "Group carbon footprint - annual GHG emissions".
(32) For details on the scope used, see section 2.3.2.1.3 point 1. "Group carbon footprint - annual GHG emissions".
(33) Annex II Acronyms and Defined Terms, Net-zero target.

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

EDF supports its customers in reducing their carbon footprint by offering energy efficiency and sufficiency advice, as well as decarbonisation solutions. The main driver is the electrification of uses (electric vehicles, electrified industrial processes, low-carbon heat, etc.) through low-carbon, available, competitive and sovereign electricity that gradually takes over from fossil fuels. In France, this translates, for example, into the goal of contributing to generating 150TWh of additional electricity demand in 2035 compared to 2023, mainly as a substitute for carbon-intensive energies.

Backing customers in reducing their carbon footprint, which is replicable in all the countries where the Group operates, is in line with all the ambitious decarbonisation scenarios, notably those of the IEA[34] and the NGFS[35], as well as France's national low-carbon strategy.

The associated policy aims to support customers and regions in the electrification and decarbonisation of their activities, *via* a wide range of offerings adapted to the different markets.

This requires that conditions conducive to such development be in place, through a reinforcement of the robustness, intelligence and flexibility of the network, through better management of intermittency and flexibility, and through the development of storage. This also involves seeking technical and financial innovations to provide sustainable electricity at a reasonable price and a requirement in terms of the quality of the service offered.

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

Generate more low-carbon electricity

The IPCC classifies electricity generation technologies either as carbon-based technologies, i.e. based on fossil fuels (such as gas or coal), without carbon capture and storage, and therefore generating direct greenhouse gas emissions, or as low-carbon technologies, *i.e.* with little or no direct emissions[36] of greenhouse gases (such as hydropower, nuclear power, wind and solar power, bioenergy, fossil fuels with carbon capture and storage - CCS).

According to Enerdata's latest annual ranking[37], the EDF group is the world's leading producer of electricity with no direct CO_2 emissions, due notably to the size of its nuclear and hydropower generation fleet. The Group's electricity generation mix was 95% decarbonised in 2025.

95%

OF THE GROUP'S ELECTRICITY GENERATION MIX DECARBONISED IN 2025

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 achieve this, the Group aims to maximise the availability and operating lifespan of its low-carbon assets, in particular its existing nuclear fleet, under the best possible safety and performance conditions, to build new large and small nuclear reactors, and to contribute to the development of renewable energies.

This ambition is aligned with the 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 level.[38] 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 (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[39] 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.).

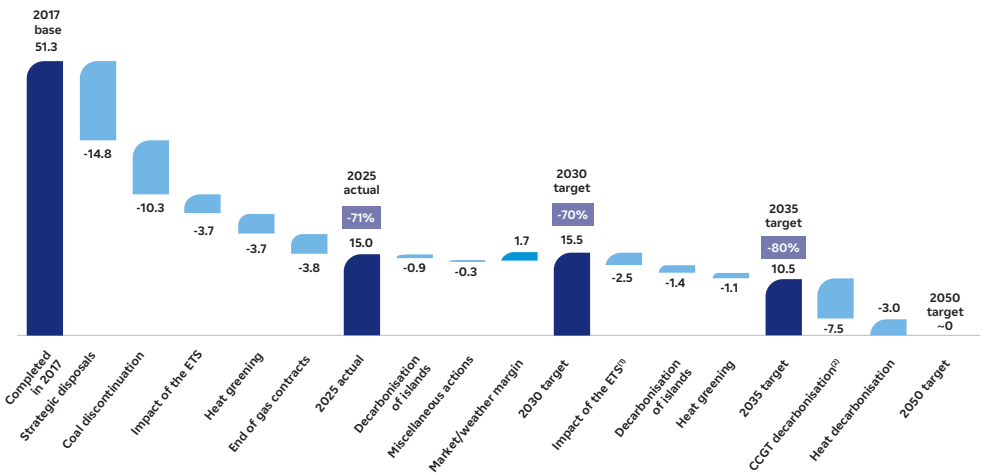
(34) IEA, International Energy Agency, Net Zero Emissions by 2050 scenario.
(35) NGFS, The Network of Central Banks and Supervisors for Greening the Financial System, Net Zero 2050 scenario.
(36) This does not include the emissions relating to the fuel supply chain and the life cycle of the other components of the production system.
(37) This is the Enerdata annual benchmark for electricity producers: power-producers-ranking.enerdata.net
(38) https://www.edf.fr/en/the-edf-group/edf-at-a-glance/reference-publications/edf-scenario-net-zero-2050
(39) EDF SEI: EDF Systèmes Energétiques Insulaires.

2.3.2.1.2 Actions and resources in relation to climate change policies

2.3.2.1.2.1 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 $MtCO_2e$)*



(1) EU ETS: European Emissions Trading Scheme.
(2) CCGT: combined cycle gas turbine.

Actions to reduce direct emissions	
Strategic disposals	Strategic disposals of carbon-intensive assets, notably 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 the demand on combined cycle gas turbine plants by the network due to the price of CO_2 in the European ETS market and to the priority given to injection of renewable energies.
Renewable heat	Greening of the heating networks managed by the Group using wood energy, 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 the weather conditions (objectives based on normalised weather conditions)
End of contracts	Decrease in the electricity output due to the end of the PPA(1) for the Norte Fluminense power plant in Brazil, transfer of the MECO power plant in Vietnam at the end of the Build Operate Transfer-type contract.
Decarbonisation of islands and non-interconnected areas	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 fugitive SF_6 emissions from electricity transmission and distribution equipment and fugitive HFC(2) emissions from air conditioning systems; complete electrification of the EDF group's light vehicle fleet as part of the EV100 commitment.
Capture of CO_2	Study of the technical and economic feasibility of a first CO_2 capture and storage system on a combined cycle gas turbine belonging to the EDF group in Italy.

(1) PPA, Power Price Agreement.
(2) Hydrofluorocarbons.

Low-carbon generation

EDF has the largest low-carbon energy investment programme in Europe[40]

The EDF group is investing heavily in low-carbon electricity generation facilities to help build a CO_2-neutral energy future.

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 and the operational life extension 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 the 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.

The implementation of the EDF group's roadmap to increase the generation of low-carbon electricity by 2035 involves maximising the availability of the existing nuclear fleet under the best conditions of safety and performance, the construction of new reactors, and the development of additional low-carbon capacity (up to 6GW gross of renewable energy commissioned per year).

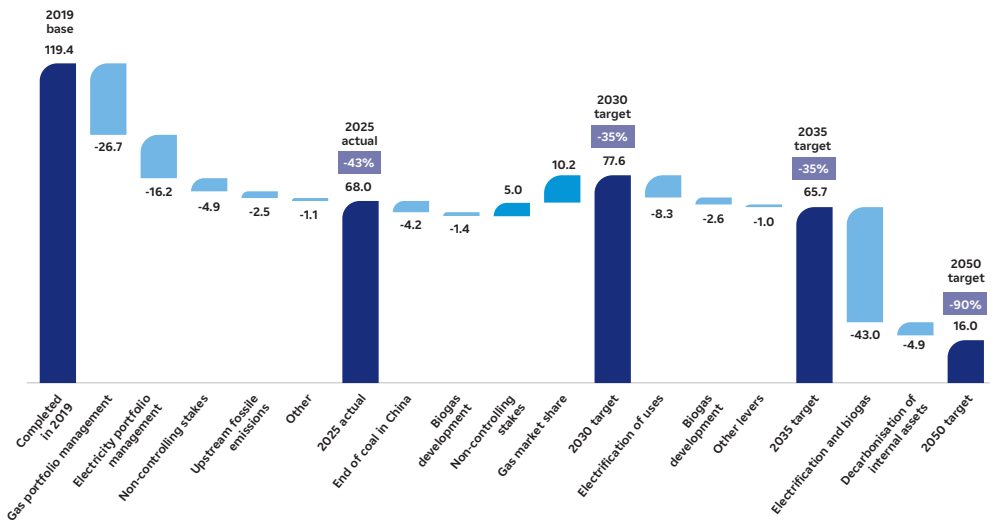
(40) 10th financial barometer of European energy companies "Watt's Next Conseil", June 2024: wattsnext.fr/wp-content/uploads/2024/07/Watts-Next-Barometre-financier-2024.pdf

2.3.2.1.2.2 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 *(in $MtCO_2e$)*



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 resale to end customers, in particular in countries where electricity has a high carbon intensity, and 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.
Other	Other factors influencing the Group's indirect emissions, including purchases, employee travel and waste management.
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- and medium-term organic growth in EDF's 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 low-carbon strategies.
Other levers	Reducing emissions from employee travel, in view of the roll-out of the EDF group's new travel policy.

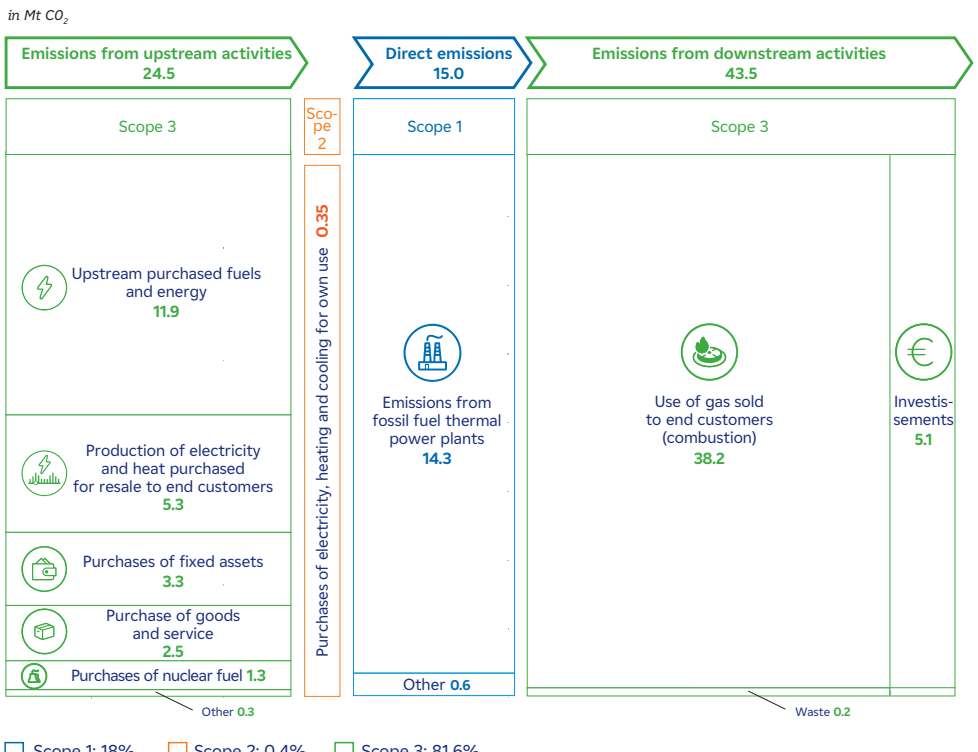
2.3.2.1.3 Targets and indicators related to climate change mitigation

1. Group carbon footprint – annual GHG emissions

EDF calculates its carbon footprint in accordance with the GHG Protocol[41] methodological standards, which are internationally recognised for greenhouse gas emissions accounting. This approach quantifies the dependence of the Group's activities on direct and indirect GHG emissions, including Scopes 1, 2 and 3. It facilitates the temporal monitoring of estimated emissions, while ensuring comparability among the different players. The carbon assessment is a management tool enabling EDF to guide its decisions in terms of environmental performance and its low-carbon pathway.

The Scope 1 and 3 emissions are calculated using the *location*-based approach, and the Scope 2 emissions are calculated using both the *location*- and *market*-based approaches.[42]

2025 Group carbon assessment by emission category



(41) The Greenhouse Gas Protocol Initiative, commonly known as the GHG Protocol, is the most internationally recognised method for carbon accounting. Launched in 1998 by the World Resource Institute (WRI) and the World Business Council for Sustainable Development (WBCSD), it was developed in partnership with businesses, NGOs and governments: ghgprotocol.org/

(42) These two approaches are defined in the section "Details of the Group's carbon footprint", in the section dedicated to Scope 2 on page 166 of the URD.

2. A carbon trajectory compatible with 1.5°C

The EDF group is committed to the fight against climate change. It has set a decarbonisation ambition compatible with the Paris Climate Agreement, the aim of which is to keep global warming well below 2°C, preferably at 1.5°C, compared to pre-industrial levels.

Net Zero long-term commitment

The EDF group's Net Zero commitment is based on a reduction of at least 90%[43] of its direct and indirect emissions, and a neutralisation of the residual emissions through high-integrity carbon sinks (see the table of these Net Zero objectives to 2050 in the section "A Net Zero emissions goal backed by an ambitious carbon trajectory"). This long-term commitment is supported by a trajectory for reducing emissions in the short and medium term, compatible with a global warming of 1.5°C.

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

EDF group indicator	Achieved 2024	Achieved 2025	2025 milestone	2027 milestone	2030 target	2035 target	2050 target
Carbon intensity (gCO_2/kWh)	30	26.5			30	22	~0
Scope 1 ($MtCO_2e$)	16.8	15.0	20.0	18.0	15.5	10.5	
% reduction *vs* 2017 (2017 baseline data: 51.3 $MtCO_2e$)	-67%	-71%	**-60%**	**-65%**	**-70%**	**-80%**	**Net Zero -90%**[1]
Scope 3 ($MtCO_2e$)	73.3	68.0		83.6	77.6	65.7	
% reduction *vs* 2019 (2019 baseline data: 119.4 $MtCO_2e$)	-38%	-43%		**-30%**	**-35%**	**-45%**	
Scope 3.11 emission ($MtCO_2e$ *vs* 2019) (2019 baseline data: 60.1 $MtCO_2e$)	-37%	-36%			**-28%**		

(1) Scopes 1, 2 and 3. The residual emissions will be neutralised (with a view to net zero emissions) through the use of carbon contribution projects.

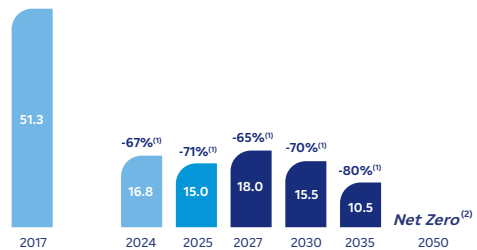
Reduction of direct emissions

In November 2023, the EDF group set new targets for reducing its direct[44] emissions of greenhouse gases. These reinforce the ambition level that the Group set for itself at the end of 2020 in terms of the absolute Scope 1 emissions and carbon intensity to be achieved by 2030. They supplement them by setting a 2025 and 2035 milestone for the **Scope 1** emissions and a 2035 milestone for the **carbon intensity**. In November 2024, the Group set a new milestone for 2027 for Scope 1.

Scope 1 targets

2025 target	**60% reduction** in Scope 1 emissions compared to 2017, ***i.e.* 20.0 $MtCO_2e$**
2027 target	**65% reduction** in Scope 1 emissions compared to 2017, ***i.e.* 18.0 $MtCO_2e$**
2030 target	**70% reduction** in Scope 1 emissions compared to 2017, ***i.e.* 15.5 $MtCO_2e$**
2035 target	**80% reduction** in Scope 1 emissions compared to 2017, ***i.e.* 10.5 $MtCO_2e$**

Scope 1 emissions *(in $MtCO_2e$)*



(1) Vs 2017.
(2) Reduction of emissions by at least 90% on the three scopes, followed by neutralisation of the residual emissions.

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 around 41 $MtCO_2e$ in 2035 compared to 2017. In 2025, EDF's Scope 1 emissions reached 15.0 $MtCO_2e$, below the 2025 target of 20 $MtCO_2e$, representing a 71% reduction compared to 2017.

(43) To neutralise the residual emissions (with a view to net zero emissions), the use of carbon contribution projects, aimed at "sequestering" the CO_2 present in the atmosphere and storing it, is only considered for after 2030.
(44) As indirect Scope 2 emissions represent less than 0.3% of the Group's greenhouse gas emissions, they are not covered by the new targets.

Group carbon intensity

The emissions reduction efforts are also reflected in the carbon intensity of the Group's electricity and heat generation, which amounted to 26.5 gCO_2/kWh in 2025, down by 3.5 gCO_2/kWh compared to 2024. The carbon intensity of the electricity and heat generated by the EDF group is around 7 times lower than the European average (187 gCO_2/kWh[45]) and more than 17 times lower than the global average (446 gCO_2/kWh[46]).

The change in the Group's carbon intensity in 2025 reflects the continued high level of low-carbon generation, in addition to the reduction in direct emissions (Scope 1) presented in section 2.3.2.1.3.1. Nuclear generation increased by 1%, to reach 410TWh (+5.9TWh compared to 2024), notably thanks to increased availability in France where it amounted to 373TWh, exceeding the initial forecasts. Wind and solar generation increased by 3%. Conversely, hydropower generation fell by 16% (-9.1TWh), with 2025 returning to a normal hydropower level after an exceptionally favourable year in 2024. The share of fossil fuel generation in total electricity and heat generation amounted to 7% in 2025 (40TWh), a 4TWh decrease compared to 2024.

However, this performance took place in a context of market and demand conditions that were particularly favourable to a low use of fossil thermal electricity generation facilities. In the scenario of a rapid return to average conditions (pre-2030), maintaining the carbon intensity below the threshold of 30 gCO_2/kWh cannot be guaranteed.

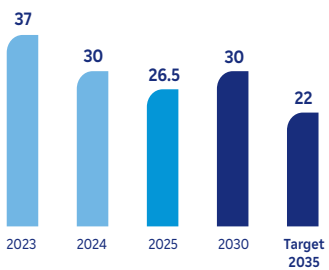
The carbon intensity is an information item specific to EDF and a ratio calculated between the Scope 1 CO_2 emissions[47] of the Group's electricity and heat generation plants and their associated generation levels, and therefore does not apply to the same scope as the low-carbon generation indicator.

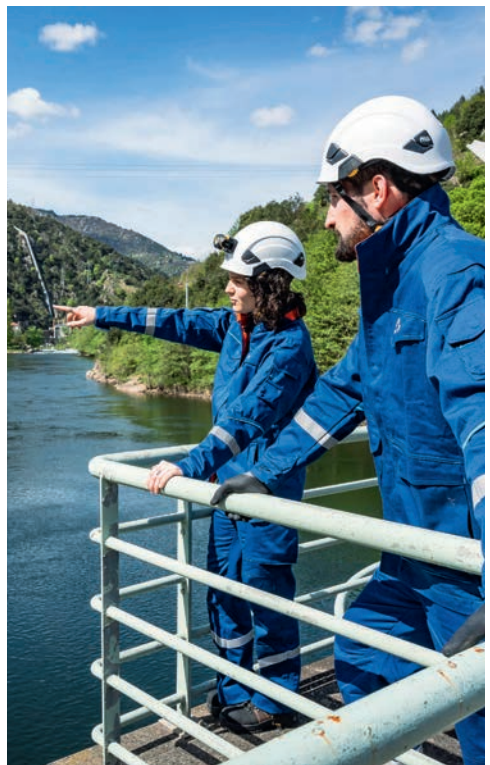
Carbon intensity trajectory

2030 target	30 gCO_2/kWh carbon intensity
2035 target	22 gCO_2/kWh carbon intensity

Change in carbon intensity

(in gCO_2/kWh)





(45) 2024 data, EU-27, European Environment Agency, Greenhouse gas emission intensity of electricity generation in Europe, November 2025.
(46) 2024 data, International Energy Agency, World Energy Outlook 2025.
(47) Direct CO_2 emissions related to generation, excluding the life cycle analysis of generation facilities and fuel (corresponding to approximately 96% of Scope 1).

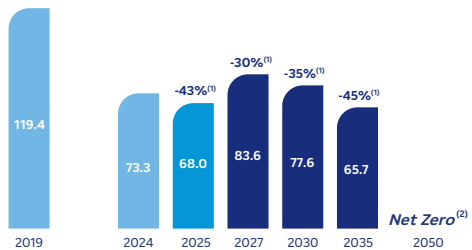
Reduction of the value chain emissions

The EDF group has set targets for reducing its indirect **Scope 3** emission by 2030, both for the whole of Scope 3 and specifically for the part of Scope 3 associated with gas sales to its end customers (see the section "Labelling of the Group's emissions trajectory").

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 $MtCO_2e$)*



(1) Vs 2019.
(2) Reduction of emissions by at least 90% on the three scopes, followed by neutralisation of the residual emissions.

The indirect emissions reduction target applies to all of the Group's Scope 3 emissions, and ensures that the Group is committed to a short-term 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% by 2027, 35% by 2030, and 45% by 2035, compared to 2019, for the whole of Scope 3. This represents an absolute reduction of around 54 $MtCO_2e$ in 2035 compared to 2019. In 2025, the Group reduced its Scope 3 emissions by 43% compared to 2019, the reference year for Scope 3 emissions.

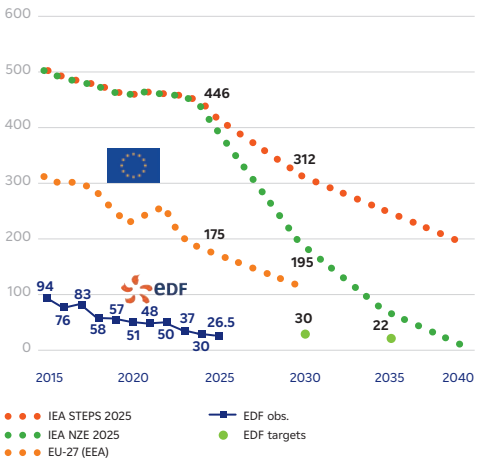
Labelling of the Group's emissions trajectory

The level of ambition of the Group's emissions reduction targets presented in the previous paragraphs has been assessed by Moody's as being part of an emissions trajectory compatible with a 1.5°C warming scenario.[48] Since the validation of this trajectory in early 2024, the Group's Scope 3 ambition has been raised (see the section "Reduction of the value chain emissions"). Like SBTi, Moody's relies on the sector curves of the IEA scenarios (see the graph for the world scope). A comparison with EDF's trajectory shows that the Group's cumulative emissions intensity between the reference year and Net Zero are well below the IEA's Net Zero scenario, and that its short, medium and long-term targets are compatible with such a scenario.

(48) For more details, see Moody's "Net Zero Assessment" report: https://www.moodys.com/web/en/us/solutions/ratings/nza.html.

Sectoral curves of the IEA direct emissions scenarios

(global carbon intensity[49] and for EDF in gCO_2/kWh)



The STEPS and NZE scenarios are the two global scenarios considered by the IEA in the World Energy Outlook 2025.

The STEPS scenario leads to an estimated warming of 2.4°C in 2100.

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 2025 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%

The reference year chosen, 2017, corresponds to the first year of publication of the EDF GHG assessment. This reference year remains representative in 2025 in terms of the scope and influence of external factors: the changes compared to the current scope of the Group's activities and the influence of external factors on the changes in the Group's assessment have all been traced.

2025 marks the 10th anniversary of the Paris Agreement, which was adopted on 12 December 2015 at COP21, and which motivated the development of ambitious climate policies in Europe and worldwide.

THE EDF GROUP CAN CLAIM TO HAVE **DIVIDED BY FOUR ITS DIRECT SCOPE 1 EMISSIONS** SINCE 2015 (FROM 60.4 $MTCO_2E$ IN 2015 TO 15 $MTCO_2E$ IN 2025) AND **BY MORE THAN THREE ITS CARBON INTENSITY** (FROM 95 GCO_2/KWH IN 2015 TO 26.5 GCO_2/KWH IN 2025), WHILE MAINTAINING ITS POSITION AS THE LARGEST PRODUCER OF ELECTRICITY IN THE WORLD WITHOUT DIRECT CO_2 EMISSIONS.

The Group's 2030 greenhouse gas reduction targets were set in 2020 and validated that same year as being part of a Well Below 2°C emissions trajectory by the Science Based Targets initiative (SBTi)[50], according to the latter's methodology specifically developed for the electricity sector.[51]

These **SBTi objectives for 2030** are as follows:

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

The Group chose not to submit its new objectives defined in 2024 to the SBTi, pending a change in their methodology (process under way and expected to be finalised in 2026). The current methodology amounts to setting an identical carbon intensity reduction target for all utilities (around -77% between 2017 and 2030) regardless of their initial carbon intensity, which strongly penalises players that are already well advanced in their decarbonisation, such as EDF.

It is understood, however, that there is currently no consensus on targets or trajectories for reducing greenhouse gas emissions at the level of a company (the objectives being set at the level of the States) which could ensure the compatibility of a strategy with a scenario limiting global warming to 1.5°C in accordance with the Paris Agreement.

As of 31 December 2025, the EDF group was not excluded from the "Paris Agreement" benchmarks, a recognition of the compatibility of the Group's business model with rapid decarbonisation.

See all the Group's policies, actions and results concerning climate change in section 3.2.2 "ESRS E1 - Climate change" on page 152 of the Group's 2025 Universal Registration Document, available on the website

(49) The curves presented represent the carbon intensity of electricity and heat at the global level.
(50) Initiative launched following the Paris Agreement in 2015 by the following four organisations: CDP, UN Global Compact, World Resources Institute and World Wild Fund.
(51) Setting 1.5°C aligned science-based targets – quick start guide for electric utilities, CDP, June 2020.

2.3.2.2 Preventing and mitigating the impacts of potential discharges on air, water and soil

2.3.2.2.1 Policies related to pollution control

The EDF group generally limits its environmental footprint throughout the life cycle of its facilities and activities, by minimising the use of natural resources, ensuring responsible land management and contributing to integrated and sustainable water management. These commitments are included in its CSR policy.

1. From the design stage of the facilities

Before the commissioning of its facilities, EDF carries out an environmental impact analysis, shared with the competent authorities, to assess the significant effects. This approach allows EDF to identify potential effects on the environment as early as possible and aims to avoid, reduce or offset these effects. In France, this approach is governed by the French Environment Code (Article L. 122-1): the environmental assessment of a project is a process involving the production of an environmental impact study by the project manager, the performance of administrative consultations (environmental authority and local authorities, in particular) and the public (public inquiry as a general rule).

In addition, in order to avoid or minimise the emissions into the atmosphere, water and soil, the Group refers to the best available techniques (BAT), described in the Best Available Technique References document. This document, developed by the European Commission in consultation with stakeholders (manufacturers, governments, NGOs, etc.), is applicable in Europe and revised periodically.

2. In normal operating phase

Compliance with environmental regulations

At all of its thermal and nuclear generation sites, EDF ensures compliance with the limits concerning thermal and chemical discharges into the air and water authorised by the competent authorities such as the Regional Environment, Planning and Housing Department (*Direction régionale de l'environnement, de l'aménagement et du logement* – DREAL) (thermal fleet) and the French Nuclear Safety and Radiation Protection Authority (*Autorité de sûreté nucléaire et de radioprotection* – ASNR) (nuclear fleet) in France, and by any other competent authority in the rest of the countries where the EDF group operates. The discharge authorisations limit the levels of chemical and radiological substances discharged into the water and the thermal discharges caused by the cooling circuits to values that protect aquatic environments. In terms of atmospheric emissions, the Inspectorate of Listed Facilities ensures compliance with the emission limit values of the facilities within its scope. It conducts inspections to verify compliance with the requirements set out in the prefectural decree specific to the facility, through site visits, based on self-monitoring or control documents submitted by authorised bodies. Furthermore, facilities carrying out an activity referred to in Annex I of Regulation (EC) 166/2006 E-PRTR are subject to an annual declaration of their discharges.

In France, the facilities in question submit their declaration on the GEREP platform, which is automatically forwarded to the inspection service responsible for monitoring the facility. The Inspectorate of Listed Facilities checks the declarations adapted to the challenges in terms of discharges. The data reported in GEREP is incorporated into the French pollutant release and transfer register (IREP) as well as the European pollutant register E-PRTR. The European register contributes to transparency and public participation in environmental decision-making.

Effluent control and environmental monitoring

The Group's industrial sites are subject to strict regulations in terms of monitoring of the environmental impact of their emissions and discharges to ensure that there are no significant environmental and health impacts. This monitoring, which is adapted according to the site, is based on two complementary approaches:

- continuous on-site measurements, allowing rapid detection of any anomalies;
- regular sampling and measurement campaigns carried out in atmospheric, terrestrial and aquatic compartments, including groundwater. The samples are then analysed in the laboratory according to adapted protocols. These measures are implemented in accordance with regulatory requirements and provide a routine monitoring function.

Moreover, there are voluntary and responsible sampling campaigns and expert assessments to further develop the understanding of the environmental fate of the substances discharged. In addition to the continuous measurements, each nuclear power plant carries out more than 10,000 chemical and radiochemical measurements per year. The associated data is publicly available online.(52)

Continuous improvement

The Group's entities implement a programme to eliminate or replace certain chemicals with more environmentally friendly products where technically feasible. These measures mainly focus on carcinogenic, mutagenic or reprotoxic (CMR) chemicals or other substances considered to represent a cause for concern. The application of the best available techniques (BAT) for the installations' pollution control ensures optimised management of the effluents produced. In this context, actions are taken to eliminate substances that could negatively impact the environment.

The EDF group no longer uses phytosanitary products for the maintenance of the outdoor areas of its industrial sites except in sensitive areas for safety and/or security reasons. Work is underway to find alternatives to phytosanitary products in these specific areas that are still treated. In mid-2022 Enedis decided to stop using phytosanitary products in source substations (except on surfaces where their use is necessary to control safety and security risks) and to construct all its new source substations in such a way as to avoid the subsequent use of these products.

(52) The data are available on the mini-websites of each nuclear power plant and on the website of the National Network for the Measurement of Environmental Radioactivity (https://mesure-radioactivite.fr/#/).

3. In the event of an incident

The Group has an operational system for identifying, managing and monitoring events concerning water, air and soil. It is integrated into the EMS. EDF is setting up the following initiatives:

- **environmental monitoring associated with emissions and discharges:** see section 2.3.2.2.1 "Policies related to pollution control";
- **anticipation of potential events:** locally, each operational unit and Group company identifies potential events that could have an environmental impact and identifies the associated control actions;
- **crisis management exercises:** the Group's crisis management policy requires regular testing of the crisis systems through an annual programme of crisis exercises;
- **incident follow-up:** an organisation is set up to monitor and communicate on the environmental events falling under the responsibility of each site. Major environmental events must be reported and analysed;
- **feedback about crises experienced within and outside the Group:** the feedback is taken into account in risk studies and control actions. For example, the lessons learned from the fire in 2019 at the Seveso-classified Lubrizol plant in Rouen were included in the analyses, and the additional orders relating to the storage of flammable liquids and toxic materials were integrated into the Group's ICPE-classified industrial tools.

4. Post-operations

The Group has launched a programme to decommission industrial assets that are no longer in operation, including, where necessary, discharge control and environmental monitoring, and in some cases soil rehabilitation operations (see section 2.3.2.2.3 "Actions related to soil pollution").

2.3.2.2.2 Air pollution: discharges of NO_x, SO_2, dust

2.3.2.2.2.1 Actions related to discharges of pollutants into the air (NO_x, SO_2, dust)

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 2025, 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 best available techniques (BAT) on the market are adopted to obtain an expected energy efficiency of more than 60%. These more efficient facilities, such as the recent Presenzano power plant, emit lower amounts of nitrogen oxides (a reduction of around 60% compared to facilities of the same size), sulphur oxides and dust.

In some cases, thermal installations are replaced by technologies that do not emit NO_x or SO_2, such as 100% renewable energy microgrids in island systems (isolated systems). In addition, actions are taken to reduce the NO_x emissions of island systems, on a case-by-case basis: optimisation of exhaust gas treatment processes, or reduction of the operating hours for certain 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 bioliquids as a substitute for fossil fuels. This low-sulphur fuel will lead to a significant reduction in the Group's SO_2 emissions;
- the phase-out of coal by 2030 (2027 for France). The combustion of coal induces emissions of substances such as SO_2 and dust. These emissions come from impurities present in coal.

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).

In 2025, the Group implemented **measures to manage and reduce the atmospheric emissions** from its facilities:

- in island territories, the conversion of thermal installations to bioliquids has positive effects on CO_2, SO_2 and dust emissions in particular. Bioliquid tests were conducted on the thermal fleet in mainland France (Vaires combustion turbines) in 2024;
- in mainland France, the use of non-road diesel instead of fuel oil in combustion turbines from the end of 2025 will also help to reduce SO_2 emissions;
- the exit of certain Edison Next Poland facilities and the sale of Sesto San Giovanni (fossil fuel technologies) reduce the scope of the Group's facilities likely to emit substances into the air.

2.3.2.2.2.2 Targets and indicators related to discharges of pollutants into the air (NO_x, SO_2, dust)

The emissions (NO_x, SO_2 and dust) from the EDF group's generation sites are governed by local or national regulations. Each site, depending on its specific nature (type of power plant, storage area, etc.), is subject to pollutant emission limit values that may be specific, based on scientific studies, and set by administrative order.

Translating the emission limits of the generation sites into exhaustive generic targets for the Group's air pollution is not very relevant. In addition, the operation of combustion facilities emitting these substances varies greatly from one year to another and depends on the overall balance of the electricity system.

The Group has chosen to set a Group target specifically linked to reducing the sulphur oxide emissions from the Group's thermal power and heat generation facilities by 2035 in order to prevent atmospheric acidification:

Target	Reference	Review	Scope	2025
Reduction of SO_2 emissions by 75% in 2035	2019	Annually	The Group's thermal power and heat generation facilities	-46%

The list of substances emitted into the atmosphere monitored by the Group's combustion facilities may vary depending on local regulations or facility type. An analysis of the emissions from the Group's facilities was carried out in relation to the thresholds set in the E-PRTR regulation. The following values represent the three main atmospheric pollutants that serve as indicators of the Group's thermal generation fleet: SO_2, NO_x and dust. These pollutants historically monitored by the Group constitute the Group's most significant pollutant flows.

The substances emitted into the atmosphere are:

Scope	Review	Related indicators *(kt)*	2024	2025
Group's thermal power and heat generation facilities	Annually	SO_2	10	10
		NO_x	28	28
		Dust	3	3

In 2025, the NO_x emissions from the Group scope amounted to 28 kt, stable compared to 2024.

The conversion to bioliquid fuel initiated by island thermal installations is contributing to a reduction in SO_2 emissions, starting in 2019 and reaching 10 kt in 2025.

2.3.2.2.3 Actions related to soil pollution

The EDF group is subject to regulatory provisions, particularly the industrial emissions directive in Europe. These regulations impose, for each site concerned, the initial description of the soil condition and the restoration of the site to a condition at least equivalent to that initially described and compatible with future use for an industrial activity.

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 rehabilitation.

Numerous thermal power plants using fossil fuels have been shut down over the last 20 years in mainland France. A rehabilitation programme for these sites is conducted, beyond the decommissioning phases of the buildings and existing structures, with the primary objective of restoration compatible with future industrial-type use. In this context, actions are carried out at these sites, depending on the condition of the soil and the identification of historical markings, in accordance with the methodological and regulatory standards in force, notably the national methodology for polluted sites and soils.

As part of the programmes to dismantle nuclear power plants that have been permanently shut down in France, operations are carried out with a view to restoring the sites to a condition compatible with future industrial use.

In 2025, the clean-up of the former Saint-Laurent A2 electrical transformer site, which had been contaminated with hydrocarbons, was completed. Approximately 4,500 m^3 of soil were excavated and sorted in view of their marking, according to thresholds set by the ASNR, and 3,800 tonnes were evacuated to a biological soil treatment platform in Indre-et-Loire.

In Italy, Edison, as Montedison's successor, is responsible for the decontamination of several historic industrial sites. The company is carrying out corrective actions on 36 sites spread over 16 geographic areas, including four sites of national interest. In 2021, in collaboration with Greenthesis and ACR Reggiani, Edison and Edison Regea created Tre Monti, specialising in soil and groundwater remediation at the Tremonti site in the Bussi Sul Tirino site of national interest. Since July 2024, the rehabilitation work has been managed by the new subsidiary of the Edison Regea Srl group.

See all the Group's policies, actions and results concerning climate change in section 3.2.3 "ESRS E2 - Pollution" on page 180 of the Group's 2025 Universal Registration Document, available on the website

2.3.2.3 Preventing and mitigating the impact of consumption with potential effects on raw material resources, waste generation and freshwater resources

2.3.2.3.1 Policies related to resource use and circular economy

The Group makes the optimal use of the natural resources consumed by its value chain an essential component of its corporate responsibility.

In this context, compliance by Group entities with the regulations in force on waste of all kinds is an essential component of this commitment.

In order to control the impacts related to the generation of waste and the risks related to the flows of incoming resources, **the Group's CSR policy** aims to develop the circular economy approach and improve the recovery of the waste generated. In this context, the Group endeavours to:

- **promote a circular economy approach** from the design phase of major projects by integrating an eco-design analysis to reduce the environmental impact throughout the facility's life cycle by involving, among others, regional stakeholders;
- **limiting the generation of conventional waste** by promoting the reuse, recycling and recovery of products/materials throughout the value chain: an adapted waste management approach is put in place for new construction sites in order to prevent and/or limit the generation of conventional waste and promote its recycling, recovery and reuse, particularly for parts and equipment during the decommissioning of industrial facilities.

R&D programmes focusing on the circular economy and local areas support the engineering and generation centres in implementing virtuous initiatives designed to conserve resources, prevent waste generation, and improve waste recovery in the appropriate sectors.

Furthermore, with regard more specifically to the **treatment of conventional waste**, the policy is implemented in various areas:

- implementation of on-site pre-treatment of the various waste types, in order to limit the volume generated and promote the recovery of the remaining fraction (concentration of hydrocarbons, separation of asbestos);
- establishment of partnerships with leading players in recycling;
- recovery of waste in authorised channels: for example, excavated soil from construction sites or sediments from hydropower dams are recovered as aggregates for civil engineering or public works;
- sorting and recovery of certain types of waste through dedicated recovery channels (end-of-life wind power or solar power assets for EDF power solutions);
- development of the reuse of parts and equipment, particularly during the decommissioning of industrial facilities.

In order to address the risks related to incoming wood energy resources, the supply of sustainable biomass is based on the development of a supply chain involving certified forests as well as by-products from the forest industry.

In terms of **nuclear dismantling and management of radioactive waste**, the Group has developed, in compliance with the regulations in force, an approach that allows it to:

- coordinate all operations of the nuclear fuel cycle, from purchase to use, and the downstream part of the cycle in France (storage in pools, treatment of spent fuel, conditioning of radioactive waste, recycling of recoverable materials, and storage of conditioned waste before storage);
- assume its responsibilities with regard to radioactive waste and, in France, decommission nuclear power plants in a completely safety manner and in compliance with environmental standards (by optimising and managing the radioactive waste from operations and decommissioning, for which the Group is responsible, by developing treatment channels to reduce the volume of waste warehoused and stored). EDF has set up dedicated assets to secure the financing of its long-term obligations.

The EDF group implements all of these measures according to a principle of subsidiarity and proportionality to the challenges within each business line and subsidiary of the Group.

2.3.2.3.2 Resource inflows

2.3.2.3.2.1 Actions and resources related to incoming resources

The EDF group has embarked on a process of improving the efficiency and optimisation of incoming resources. These efforts include the optimisation of fuel needs and the responsible management of raw materials. To achieve these objectives, the Group has embarked on a series of initiatives, described below, combining technological innovation, rigorous analyses and sustainable practices.

The EDF group supports the move towards energy use sobriety in order to control the sizing of new electricity generation infrastructures and, thus, to optimise the use of the resources necessary for the energy transition.

Optimisation of fuel needs

Fuels, in particular uranium, gas, fuel oil, bioliquids and wood energy, represent a significant share of the raw materials used by the Group for the generation of electricity and provision of energy services. In 2025, the Group continued the actions initiated in 2024 to optimise its fuel needs.

To optimise the use of fossil fuels, the Group focuses on several factors:

- the use of high-efficiency, next-generation gas-fired combined cycles (Edison's Marghera Levante and Presenzano facilities in Italy, commissioned between 2023 and 2024);
- the use of renewable and recovered resources (wood energy, waste heat, etc.). For example, Dalkia has a purchasing policy for these boiler plants, using renewable biomass resources as fuel. The wood energy comes mainly from by-products of forestry operations carried out for timber;
- the optimisation of EDF SEI, Dalkia or EDF Energy's existing facilities by improving energy efficiency or process efficiency, fuel quality requirements, or enhanced monitoring of efficiency levels (e-monitoring). For example, Dalkia uses an energy management tool to optimise the use of fuel in energy facilities and to increase the use of renewable energies (wood energy) as a substitute for fossil fuel, and EDF SEI has obtained ISO 50001 certification for seven thermal sites in island regions;
- the development of renewable energies, which contributes to reducing the use of fossil fuels. The conversion of the thermal fleet of island systems to sustainable liquid biomass enables a reduction in fossil fuel use in the context of facility renovation projects that also aim to optimise the consumption of biomass. EDF Energy is committed to phasing out fossil fuels and closed its last coal power plant in 2023;
- actions related to the optimisation and recycling of uranium

Responsible management of raw materials

This management is reflected in the proactive integration of these risks into the Group's various concession specifications for its suppliers. Several subsidiaries of the EDF group have taken numerous steps to ensure responsible management of incoming materials. The "On Deck" approach led by DCN to "Decarbonise the fuel cycle together", in close partnership with the suppliers concerned. Since 2023, this approach has been extended to the preservation of biodiversity and adaptation to climate change. Workshops were held with the main suppliers and discussions were conducted about supplier facilities, regions and transport routes.

The Group's purchasing function contributes to the circular economy action plan through:

- highlighting the reuse of materials (notably for the tertiary furniture markets);
- better knowledge of the supply chain and its traceability;
- the continued use of the CSR Suppliers' Club's collective intelligence workshops for nine purchasing categories (IT equipment and software, concrete, steel, workwear, waste, chemicals, heating, ventilation, air conditioning, catering);
- optimisation of resource consumption by implementing levers in contracts (around 70 of the 300 levers in the library of levers concern resource savings);
- Enedis integrates the circular economy into its purchasing criteria, either upstream *via* requirements for the reuse of materials (reuse of excavated soil, reuse or recycling of network cables), or downstream *via* eco-design and the recyclability of materials (zero plastic packaging).

This monitoring of raw or processed materials that are important for the EDF group is coupled with life cycle analyses for the major projects under development.

The Group's Strategy Department and R&D Department analyse the challenges, risks and opportunities associated with the main strategic raw materials used throughout the supply chain, based on several criteria: geopolitics, geological reserves in terms of scarcity, industrial potential for the generation and processing of raw materials, and economic projections of future market conditions (both supply and demand) for these raw materials.

Within the Group, **several activities on major project sites include life cycle analysis (LCA) and eco-design approaches** to limit the environmental impact of technologies and to optimise resource management:

- EDF Hydro launched an eco-design approach intended to be rolled out on major maintenance and development sites. This approach focuses on two main areas: the reduction of GHG emissions related to the construction of equipment and fittings, and the responsible management of raw materials. To this end, the eco-design project mobilises a network of specialised officers for each major field of hydropower, provides tools such as a life cycle analysis (LCA) model, and provides support for the teams in drafting calls for tenders. This initiative is part of EDF Hydro's 2023-2025 Nature Commitments.
- EDF power solutions carried out life cycle analyses of its technologies (onshore and offshore wind power, solar power, photovoltaic, battery storage) to identify the phases of the life cycle and the equipment with the highest impact, aiming to assess the technical and economic feasibility of potential areas for improvement.
- As part of the development of the new nuclear build EPR programme, the Group is developing an integrated approach in terms of the circular economy, including eco-design from the engineering phase of projects, for the flows of sizing materials, in particular for the civil engineering (concrete and low-carbon steel, reuse of excavated soil). The engineering centres, in proportion to the challenges, consider the circular economy with the help of appropriate methodological decision-making tools such as eco-design and circularity analysis grids. Additionally, for the Group's structuring projects, the industrial ecology and regional synergy dimension is included in the analysis from the design phase in order to optimise the management of incoming and outgoing flows of resources and waste. For example, in the industrial zone of Dunkirk, in collaboration with all regional stakeholders including manufacturers, a project was developed to decarbonise the region and pool resources such as waste heat (1.3TWh of recovered heat annually, 1.5 million Mm^3 of water saved, and 43 kt of CO_2 avoided).
- In 2025, as part of its ambition to green its heating networks and to adopt a circular approach, Dalkia deployed numerous projects using renewable and local recovered energies in order to limit the dependence on fossil fuels:
  - heat from the incineration of household waste in the energy recovery unit;
  - heat recovery from wastewater treatment plants;
  - heat recovery from the fumes from wood energy combustion;
  - waste heat recovery from industrial processes;
  - development of geothermal energy conversion.

2.3.2.3.2.2 Target and indicators related to incoming resources

To generate electricity and provide energy services, the Group uses raw materials, with fuels accounting for a significant proportion: uranium, gas, fuel oil, bioliquids and biomass. In 2025, the consumption of fossil fuels decreased: coal (-6%), heavy fuel oil (-4%), natural and industrial gas (-11%); these reductions reflect the EDF group's commitment to reducing fossil fuel consumption.

To date, the EDF group has not established a quantitative target for the consumption of strategic fuels and materials. Strategic materials are subject to prospective scientific monitoring by the Group's R&D Department and Strategy Department, both for the challenges of resource availability and the supply chain as well as the medium-term economic dimension with regard to geostrategic energy configurations. In France, EDF participates in external working groups with public authorities, academic institutions, the French Geological Survey Office (*Bureau de recherches gélogiques et minières* – BRGM) and the French Observatory of Mineral Resources for Industrial Sectors (*Observatoire français des ressources minérales pour les filières industrielles* – OFREMI) in order to improve the understanding of the challenges of strategic materials at the European and global levels and to consolidate its own internal analyses.

Materials consumed in 2025

Materials used	2023	2024	2025
Nuclear fuel[1] (tonnes)	999[2]	1,126	1,267
• of which weight of components/secondary materials used (absolute value)	-	99	171
• of which weight of components/secondary materials used (percentage)	-	9%	13%
Liquid and solid biomass excluding wood (kt)	112	268	289
Solid biomass (wood sector) (kt)	2,396	2,548	2,746
Coal (kt)	247	189	178
Heavy fuel oil (kt)	631	502	483
Domestic fuel oil (kt)	465	506	436
Natural gas (GWh LCV)	69,675	60,150	53,523
Industrial gas (GWh LCV)	372	355	279
Biogas (GWh LCV)	387	514	474

(1) The nuclear fuel is that loaded in the reactor.
(2) This value is that of the France scope (excluding the United Kingdom)

2.3.2.3.3 Waste generation

In 2025, in line with the Group's CSR policy, commitments implementing our circular economy approach were formalised and formed the basis of a common vision: thanks to the circular economy, EDF is developing, in collaboration with its stakeholders, a regional business model based on low-cost consumption and circular processes of resources, throughout the life cycle of its facilities and activities. The objective of this circular model is to maximise the economic, environmental and societal value created by EDF.

It focuses on **four axes:**

- building a circular economy culture within the EDF group;
- developing the circular economy approach in EDF group projects, notably major construction projects, by integrating the entire supply chain of the various sectors;
- resolutely committing to waste prevention and recycling at all our industrial and tertiary sites;
- integrating a new circular design into the Group's technical and commercial services for residential, local authority and corporate customers in order to provide innovative and differentiating offerings on the market.

2.3.2.3.3.1 Actions and resources related to waste

At the level of EDF SA and certain subsidiaries since 2025 (Framatome and Arabelle Solutions notably), 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 generation 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).

The multi-year action plan of the "Waste and circular economy" group, updated as of 2026, will implement the new **Circular Economy roadmap**, including the waste area, comprises two actions:

- strengthen, as a priority, waste prevention and maximise the value of the materials and waste generated through reuse, recycling and recovery channels, favouring local actors (sustainable purchasing, reuse, reconditioning, etc.);
- optimise our internal waste management to improve recycling and capture the value of waste by working closely with the EDF group's stakeholders.

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* - ASNR) in France and under the supervision of the Office for Nuclear Regulation in the United Kingdom.

Of the radioactive waste generated by EDF, around 95% 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 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 waste (VLLW) metals from nuclear facilities, planned 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 through a circular economy approach, reduce CO_2 emissions (60% reduction compared to steel production through mining) and save storage capacity at CIRES (Andra's storage centre dedicated to VLLW waste).

The facility is scheduled to be commissioned in 2031. Following the public debate held from 10 October 2024 to 7 February 2025, EDF decided to continue with the project, the advisability of which was reinforced by the feedback from many stakeholders in the region. EDF is continuing to provide information and to dialogue on the Technocentre as part of an ongoing consultation process under the aegis of guarantors appointed by the French National Commission for Public Debate (*Commission nationale du débat public*).

Treatment of radioactive waste - large components

Through the EDF group's long-standing expertise and the establishment of a European industrial platform of radioactive waste treatment plants, since 2016 Cyclife's teams have been responding to the Group's challenges and the needs of international customers in their projects to reduce the volume of their radioactive waste and optimise the cost of their operations, notably for dismantling. Whenever possible, Cyclife offers its customers materials recycling to promote a responsible and sustainable nuclear industry. Cyclife meets the growing need to preserve the final waste disposal and storage capacity of nuclear power plants.

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.

Cyclife also provides engineering and digital modelling services to prepare for dismantling operations, design waste treatment infrastructure, and develop innovative on-site and off-site treatment/conditioning 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 2025, the lower parts of the steam generators were sent to Sweden for processing.

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 the management of radioactive waste in section 1.4.1.1.2.3 "The challenges of nuclear operations", paragraph "Storage of conditioned final radioactive waste" on page 32 of the Group's 2025 Universal Registration Document, available on the website

Conventional waste

Prevention and methodology contribution of the R&D function

Two R&D projects operationally support the production businesses and focus on the management of conventional waste and the circular economy:

- **the DECINECO project:** this project is dedicated to research and experimentation aimed at strengthening the robustness of technologies incorporating eco-design and circularity in the industrial production tools. It plays a key role in improving the waste management practices and waste recovery or recycling in integrated channels;
- **the ECOCIRT project:** this project develops methodological analyses of eco-design and supports, in particular, new projects, such as the EPR2, as well as centralised electricity generation activities.

At the same time, projects are developed in collaboration with local stakeholders, using analysis methods to optimise energy and heat flows, such as the EPIFLEX project in Dunkirk.

Recognised for its expertise, the R&D Department also participates in expert groups tasked with developing national and international ISO standards on the circular economy and the management of 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.

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 still benefit others. It is intended for Group entities, as well as for companies, local authorities and associations that can benefit from EDF equipment at competitive prices or free of charge. This reuse approach 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 the emissions from its stakeholders reusing EDF equipment.

Since 2020, as part of the preparation for the dismantling of the Fessenheim nuclear power plant, a local organisation dedicated to reuse has given a second life to more than 7,500 items of industrial and tertiary equipment, representing more than 400 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 generation and operation but also external stakeholders such as companies, local authorities and associations.

IN 2025, REUSE *VIA* EDF REUTILIZ
AVOIDED THE EMISSION OF
3,259 TONNES OF CO_2 EQUIVALENT
FOR EDF AND ITS
STAKEHOLDERS, WITH 459 TONNES OF EQUIPMENT
REUSED AND 5,598 TONNES SINCE 2021.

Recovery

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 90% recyclable. Including the concrete foundations, this figure reaches 95% to 98%.

  Solutions for recycling or reusing blades are being developed for the industry: recovery and conversion into pellets for use in concrete, cement or resin (then converted into insulation panels, etc.), conversion into street furniture. For all the wind farms under its management, EDF power solutions 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.

- **Ashes recovered in technical processes**

  Resulting from the combustion of coal and biomass for electricity and heat generation, ash has properties that enable it to be recycled for various uses (particularly 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 Department 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 nine reactors being dismantled in the country, and the dismantling preparation operations are being completed on the two Fessenheim reactors shut down in 2020, to begin their dismantling in 2026 (after obtaining the decree).

For some of the dismantling operations, the Group relies on Cyclife teams, which provide innovative tools and processes (remote operation, robots) adapted to the different 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 optimise, through the minimisation of on-site cutting, the use of centralised facilities, schedules, costs, and the volumes of waste produced. These services are also provided internationally.

With regard to the decommissioning of thermal power plants, the Group implements various methods and engineering studies to limit the decommissioning waste and to recycle it as much as possible: reuse of equipment (see EDF Reutiliz), reuse of materials on site at the end of construction sites, material recycling of all waste that has a channel, reduction in the production of hazardous waste.

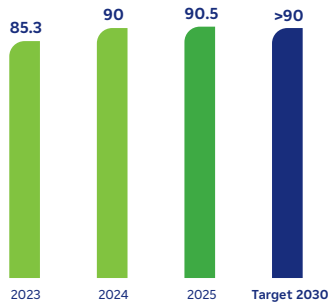
2.3.2.3.3.2 Targets and indicators related to waste

Target	Reference	Review	Scope	2024	2025
90%: annual rate of conventional waste directed towards a waste recovery industry **in 2030**	88.4 in 2022	Annually	Own activities	90.0%	90.5%

Group key performance indicator

The target for the recovery rate of conventional waste ensures that the Group manages its conventional waste generation in an optimised manner with a circularity approach allowing, following treatment, the recycling and possibly the reuse of raw materials in the generation circuit and ultimately resource savings. It thus limits the tonnage of non-recovered waste, requiring final storage that may have various negative impacts on the environment. This target was defined through an analysis of the main waste-producing activities and the technical possibilities of waste collection, sorting and recycling.

Annual rate of conventional waste directed towards a waste recovery industry *(in %)*



Inter-annual fluctuations in construction site waste generation are linked to the diversity of construction sites in the various production channels. The decommissioning of old industrial buildings containing asbestos, maintenance work on production circuits generating oil and hydrocarbon waste, and cleaning operations during the emptying of hydropower dams generating large amounts of sediment explain the variations not only in the volume and nature of the waste generated, but also in the recovery rate, for which the target is set at 90%.

See all the Group's policies, actions and results concerning the use of resources and waste in section 3.2.6 "ESRS E5 - Resource use and circular economy" on page 198 of the Group's 2025 Universal Registration Document, available on the Group's website

2.3.2.4 Preventing and mitigating the impact of consumption with potential effects on freshwater resources

2.3.2.4.1 Policies related to water resources

As a responsible user and a major player in the management of water resources, the EDF group is committed to helping preserve freshwater 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. This commitment was published in March 2025. This is reflected in the following main areas:

- water footprint management and optimisation of freshwater resource uses in terms of quantity and quality, on sites and throughout the value chain;
- contribution to the resilience of the regions where the Group operates through transparent and responsible management of water and facilities, and through positive contributions to the large water cycle;
- participation in water governance by river basin, seeking balanced and sustainable management;
- development of skills, expertise and partnerships making it possible to achieve these objectives, and awareness-raising actions for employees about these issues.

This policy is part of a prior regulatory framework for quantitative water management, setting limits on withdrawals and discharges and on the operation of hydropower facilities (minimum flow downstream of facilities). This regulation aims to ensure favourable hydrobiological conditions, and thus to limit the impact on aquatic environments.

The Group carries out water stress analyses of its thermal and nuclear power generation sites and industrial sites in order to identify those that require particular vigilance in terms of water sobriety. This is notably reflected in the rules governing the operation of facilities and therefore water withdrawals, which take hydrological conditions into account (regulated by drought decrees).

In addition, notably for new facilities planned to be located in areas exposed to high water stress, the Group directs the technological choices from the design phase towards low-water solutions to limit the pressure on the water resource. In 2025, as in previous years, the water-related issues (level of water stress, search for optimisation of the volumes used, etc.) were part of the CSR criteria used during the assessment of projects presented to the Group Executive Committee Commitments Committee

These commitments are set out in the various **international and national texts relating to water resource issues,** including the Sustainable Development Goals (SDGs) defined by the United Nations in 2015, including:

- SDG 6 focusing on water ("ensure access to water and sanitation for all and ensure the 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 river basin area;
- 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).

In France, these commitments are also included in the **Action Plan for Resilient and Concerted Water Management** launched by the French government in 2023, which aims to organise water sobriety and resource sharing.

There are two major uses of freshwater by the Group:

- **freshwater for cooling electricity generation facilities:** water used to supply the cooling circuits of thermal and nuclear power stations (open or semi-closed);
- **freshwater for industrial uses:**[53] freshwater used for industrial processes at thermal and nuclear power generation sites (make-up water for primary and secondary circuits in nuclear power plants, firefighting networks, washing systems, etc.) and freshwater used in industrial processes (metallurgical sites, heating networks, etc.).

In addition, a distinction is made between **water withdrawn** and **water consumed**: water consumed is the share of water withdrawn which is not released back into the aquatic environment (this water is either evaporated, infiltrated or incorporated). This is mainly the water evaporated in the cooling circuits of electricity generation facilities (water vapour plumes from cooling towers). The water withdrawn for industrial uses is mainly released into the environment (and therefore not consumed).

The actions developed subsequently therefore aim to control and, if possible, reduce, on the one hand, the consumption of freshwater by the cooling circuits of electricity generation sites and, on the other, the freshwater withdrawals made for industrial uses.

2.3.2.4.2 Actions related to freshwater withdrawals and consumption

The Group has initiated several key actions to better manage its sustainability challenges related to freshwater resources across all its entities that consume water for cooling and withdraw water for industrial uses. They aim to reduce freshwater usage in order to limit the pressure on this resource. This concerns all sites, whether or not they are in high water stress areas, however special attention is paid to sites located in high water stress areas.

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 preserve water quality and the environment.

Examples of specific actions are provided below. A distinction is made between the actions aiming to reduce the water consumption in the cooling circuits of electricity generation sites, and those aiming to reduce the freshwater withdrawals for industrial processes.

1. Freshwater consumption of the cooling circuits of electricity generation sites

From the design stage, nuclear and thermal power plants located along medium-sized rivers have been equipped with semi-closed cooling circuits that optimise water use and limit freshwater withdrawals: the water is recycled within the cooling system, and part of the make-up water for the air coolers comes from the reuse of water from the cooling circuits of nuclear and conventional auxiliary systems. However, some of the water is consumed (evaporation in the cooling towers).

For certain closed-loop nuclear sites located in specific contexts, regulatory measures are taken to limit the impact of the volumes consumed during low water periods:

- In Chooz, a Franco-Belgian agreement relating to the water of the Meuse stipulates that, in order to preserve the interests of downstream users during low water periods, the evaporation of one or two units of the nuclear power plant must be stopped when the flow of the Meuse decreases below certain thresholds.
- In Golfech and Cattenom, under certain flow conditions, water is released from the multi-use reservoirs located upstream, in order to balance the volumes consumed.

There are no known and operational technical solutions to significantly reduce the water consumption of the semi-closed cooling circuits of existing nuclear power plants. Indeed, the potential technical solutions would have very limited effects and would only be applicable to certain facilities. However, EDF's Engineering and R&D Departments conduct an international technical watch on innovative cooling technologies, with three potential areas for improvement studied: water recovery, the performance of dry cooling systems, and the performance of condensers. Where relevant, innovative solutions are tested in pilot projects. For example, an experiment is being conducted with the start-up Infinite Cooling, aiming to recover part of the water contained in the steam plumes of the cooling towers. This innovative process has not yet been tested at a nuclear site, but an experiment was conducted on a test platform at the Bugey nuclear site in 2024 and early 2025. It enabled the assessment of the system's water collection capacity. The average collection rate is around a few percent of the evaporated water (lower in summer than in winter). Additional studies are undertaken before deciding whether to continue the tests on an industrial facility.

(53) The water volumes used for washing solar panels, tertiary purposes and construction sites are not material and are not accounted for in the industrial uses.

For some thermal generation sites, it is possible to opt for air cooling. This solution is used in the thermal power plant near Norte Fluminense in Brazil, for EDF PEI's entire operating fleet, and for the new thermal power plant in Presenzano, Italy. The future EDF PEI Larivot bioliquid power plant in French Guiana will also be equipped with dry air-cooling systems for the engines. The thermal power plants in Italy, which are located in areas of water stress, are all equipped with either air cooling systems or hybrid cooling tower systems.(54)

The first three sites chosen for the construction of future EPR2 reactors are two coastal sites, which therefore do not use freshwater for cooling, and one site on the banks of the Rhône, which will be equipped with a cooling circuit using air coolers, limiting water withdrawal and heat discharge but resulting in consumption (evaporation).

2. Freshwater withdrawals for industrial processes

The Group has initiated a series of measures aimed at reducing the freshwater withdrawals made for various industrial uses.

Better quantifying water flows

In the water efficiency plans undertaken by the Group's entities in France (nuclear and thermal fleet, Dalkia, Framatome), the first area of action is to improve the tracking of water withdrawals and to specify water flows within the sites to better manage uses and identify strategies to reduce water withdrawals.

- The existing nuclear fleet in France has started two action programmes on this topic:
  - **The gradual equipment of water withdrawal points** with water meters and flow meters, where technically feasible. To date, the amount of water withdrawn is often estimated based on the operating times of the pumps and knowledge of their flow rates. The Rhône sites will be the first to be equipped with flow meters by the end of 2030. At the same time, campaigns to monitor the flow rates of extraction pumps were launched, with four power stations monitored in 2025. At three sites (Tricastin, Cruas and St-Alban), the measurements confirmed the flows; at one site (Civaux), the control campaign revealed discrepancies, the treatment of which is under discussion with the local authorities. Similar checks are scheduled for 2026 at other plants, supplemented by checks on pumps for industrial uses. The objective is to check all the withdrawal pumps over the next few years.
  - **Mapping water flows** for all industrial uses at a nuclear power plant (Golfech): the water flows were characterised from the withdrawal points to the discharge points, specifying the volumes and qualities required for the various processes. This work, carried out in 2024-2025, made it possible to consolidate the most relevant levers for optimising or reducing the water withdrawals.
- Since 2021, the thermal fleet has been mapping its water usage and, since 2022, has begun to equip certain combined cycle gas turbine facilities with smart meters (IoT): Bouchain in 2022/2023, Blénod in 2024, and Martigues in 2024/2025. The Brennillis combustion turbine is scheduled to be equipped in 2026, and the other combustion turbines will be equipped after 2026.
- Dalkia monitors its heating and cooling networks using thermography, remote control of sensors and meters, indicators for monitoring network water performance, etc.

Reduce leaks, renovate equipments, optimise operations

Several Group entities have reduced their water withdrawals by identifying leaks and renovating existing facilities. Better monitoring of water flows in the processes will make it possible to continue to identify any leaks in the installations that can be treated during maintenance operations.

For example, at Framatome, the new weekly monitoring of the water flows at the Jarrie plant, implemented in 2025, has made it possible to optimise operating processes and practices, resulting in a 5% decrease in the site's water requirements at constant production compared to 2019, representing a reduction in the plant's water withdrawal of approximately 65,000 m^3 in 2025.

Water recycling and reuse

Many of the Group's facilities have been designed with closed or semi closed circuits, meaning that water is recycled at all times. This is notably the case for primary and secondary circuits in nuclear power stations and heating and cooling networks. However, these systems require make-up water to compensate for leaks, evaporated water and the purges necessary for their operation (like samplings for control).

(54) A first air cooling stage (dry) and a second wet cooling stage (semi-closed).

Beyond existing water recycling through numerous closed-loop systems, the Group has implemented projects that aim to **increase water recycling or reuse**, thereby limiting water withdrawals:

- for nuclear power plants in France, feasibility studies on the REUSE[55] of industrial effluents to supplement semi-closed circuits are underway. Experiments were carried out in 2022 and 2023 at the Golfech nuclear power plant. They results validated the technical feasibility of these processes, but with constraints related to water quality (need to treat effluents, which become more concentrated as they are reused). Technical and economic studies must continue to evaluate the gains in terms of volumes and costs of this solution. A slightly different experiment is currently underway at the Tricastin power plant with promising results;
- several actions to reuse process water have been implemented at thermal power plants over the past years. A system for recycling water from the water-steam circuit was installed in 2021 at the Martigues thermal power plant, enabling the recovery of up to 40% of the site's annual requirements, estimated at 67,800 m^3 in 2025. The amount of water reused by this system will be monitored in 2026.
- Framatome carried out two operations to increase water recycling at its facilities in 2025:
  - at the Le Creusot technical centre, the closed-circuit operation of the chilled water network used for research and development activities was restored. This operation divided the site's water withdrawals by three (savings of around 5,800 m^3 of drinking water per year),
  - at the Montreuil-Juigné site, the cooling towers are being replaced by adiabatic towers, making it possible to expect significant savings in drinking water.

(55) Reuse of treated wastewater

Use of alternative water sources

To limit the freshwater withdrawals from surface water sources, it is sometimes possible to diversify the water sources: seawater desalination, rainwater harvesting and use of treated effluents from external sources (treatment plants, other industries). After treatment, this water can be used in industrial processes. It should be noted that the relevance of these actions must be analysed by integrating all environmental benefits and impacts.

Examples

- The Flamanville nuclear power plant in France and certain thermal power plants, such as Jarry Sud in Guadeloupe and Simeri Crichi in Italy, are equipped with desalination units.
- In 2023, Framatome installed seven underground rainwater storage tanks at its Montbard site. This 2,900 m^3 water reserve can cover approximately three months of operation without pumping surface water. In 2025, the site used more than 11,000 m^3 of rainwater, *i.e.* nearly 70% of the facility's needs.
- The design underway for the future EPR2 nuclear power plants for the Penly and Gravelines sites includes the reuse of water from the nearby municipal wastewater treatment plants. For the Penly power plant, rainwater and cliff drains will be used to supply water for industrial purposes.

2.3.2.4.3 Targets and indicators related to freshwater withdrawal and consumption

Freshwater 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	2025
Water intensity in kWh of the electricity generation: remain below the threshold of 0.9 L/kWh	2016	Annually	Group	0.87 L/kWh

Since 2016, the Group has been using a water intensity per kWh indicator calculated as a ratio of the total water consumption of the cooling circuits of electricity generation sites to the electricity generated. The Group's water intensity was 0.87 L/kWh in 2025, below the set threshold, despite a slight increase compared to previous years due to the increase in the share of nuclear power in the electricity generation mix.

Water intensity per kWh *(in L/kWh)*

* *Previously, this indicator was calculated on the basis of the average of the last five years. It is now provided on an annual basis. The values for 2023 are therefore different from those of the 2023 URD report (0.83 L/kW).*

Freshwater consumption for the cooling circuits of electricity generation sites

The volumes of freshwater withdrawn by the Group amount to about 13 billion m^3. The vast majority (97%) of the freshwater withdrawn by the Group is returned directly to the natural environment, meaning it is not consumed. In 2025, the Group consumed 447 million m^3 of freshwater for the cooling of nuclear and thermal power generation facilities, 1% more than in 2024 (442 million m^3), as a result of the increase in nuclear power generation in France.

2.3.2.4.4 Sharing of freshwater resources

As a long-standing major player in the management of freshwater resources in France through the operation of hydropower facilities, **the Group's water policy** includes a section on multi-use water management. In this context, the Group has initiated several actions to better manage its sustainability issues related to water resources and to promote its know-how in water management and sharing.

Actions concerning the multi-use management of freshwater 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 is involved **in national and local water governing and management bodies** (national water committee, river basin committees, local water commissions, etc.), and is represented by the French Electricity Union (UFE)[56] in the governing bodies of each catchment area. Since 2003, EDF has had an internal water coordination body in France whose operational management is entrusted to EDF Hydro. 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: reservoir water level control 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 dam water releases.

(56) Union française de l'électricité.

In order to strengthen this key role in multi-use water management for other water users and to 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:**[57] 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 river basin area stakeholders, with in some cases an increase in the low-water support volumes. To date, low-water support is provided in more than 15 valleys;
- **pump-storage power plant projects:** the EDF group is working on projects to design new pumped-storage power plants in France that will increase the flexibility of the energy generation and therefore free up the low-water support capacity for other facilities, while preserving water resources (in fact, this type of facility operates in a "closed circuit" since the water is reused between the upstream and downstream reservoirs). The French third multi-year energy programme (*Programmation pluriannuelle de l'énergie* – PPE3) consultation project plans for the development of pumped-storage power facilities with a potential of 1.5GW identified for commissioning between 2030 and 2035;
- **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 water levels and filling of dams, etc.), these skills are also valued externally, for example:
  - provision of modelling tools and technical support to some stakeholders involved in operational water management,
  - scientific collaboration with expert organisations in the field, such as INRAE, with which the R&D Department signed a joint roadmap in 2025 for the production of digital twins of water catchment areas.

See all the Group's policies, actions and results in terms of water resources in section 3.2.4 "ESRS E3 - Water resources" on page 184 of the Group's 2025 Universal Registration Document, available on the website

(57) A portion of low-water support has also been included in some concession specifications by the granting authority.

2.3.2.5 Preventing and mitigating potential impacts on ecosystems

2.3.2.5.1 Policies related to 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 owns or holds under concession. As part of this approach, the Group's entities strive to limit soil artificialisation and sealing, to optimise and enhance the value of land in accordance with regulations, notably by implementing innovative solutions to promote multi-use of land, or to deploy voluntary actions to promote biodiversity on EDF property. 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.

Since 2014, the EDF group has been regularly involved in voluntary contribution initiatives for the implementation of the French national biodiversity strategy (*Stratégie nationale biodiversité* – SNB), such as "*Entreprises engagées pour la nature*" (EEN) and *act4nature International*.

In 2023, the Group renewed its commitment to biodiversity through these two voluntary schemes, with the following objectives:

- reduce the contribution of the activities in its value chain to the major pressures on biodiversity, on land and in water and oceans, by means of appropriate sourcing, optimisation of end-of-life materials, and provision of support for customers pursuing energy sobriety;
- 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.

2.3.2.5.2 Actions and resources related to biodiversity and ecosystems

2.3.2.5.2.1 Reducing the activities' contribution to major pressure factors on biodiversity

The Group applies the principles of the mitigation hierarchy[58], or the regulations of the country where it is located if these are more stringent (notably in Europe). The Group's companies in France apply the prevent, minimise and offset (PMO) hierarchy for all projects and facilities in operation.[59] 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 strives to position new industrial developments on sites that are already artificial. As a result, EDF recycles its artificialised land for the development of generation infrastructures:

- by installing new generation units on former thermal sites: over the past 15 years, all new combustion turbines installed by EDF in France have been installed on recycled land and solar power facilities have been installed on various former thermal power plant sites. 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 (*e.g.* repowering hydropower or wind power plants);
- 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.

Impact studies have been carried out on major new infrastructure projects during the construction phase, and have implemented avoidance, reduction and possibly offsetting measures in accordance with the national legislation in force in France and the United Kingdom.

(58) 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.
(59) In France, the law on the restoration of biodiversity, nature and landscapes, adopted on 8 August 2016, requires companies to ensure that "offsetting measures aim to achieve no net loss, or even a gain, in biodiversity".

Actions during the operating phase in freshwater environments (hydropower)

Fish continuity: to ensure fish continuity (modified by the construction of dams), hydropower operators have initiated the installation of crossing devices. 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 river weirs, trapping/transportation and targeted turbine shutdowns. In view of the progress made in the construction of these facilities, eight developments located on watercourses classified in list 2 remain to be equipped. In the French overseas territories, no facility is affected by the classifications that end downstream of the facilities.

Flows: the activities of the hydropower sector can also modify the hydrological regimes. In 2025, a reduction in the reserved capacity came into effect for a facility in Pyrénées-Orientales to address multi-use challenges in a context of chronic water scarcity in the region.

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)

Flying fauna 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. 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* (FNE).

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:

- 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. An EDF-IRD thesis seeks, *via* neural networks, to establish a collision risk model;
- 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 for bat activity at altitude. Nearly two-thirds of the wind turbines operated by EDF power solutions in France are subject to regulations for bats: 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. In Belgium, all the facilities in Wallonia and some of the facilities in Flanders are equipped with curtailment systems.

Sustainable biomass supply: the supply of wood energy for electricity and heat generation can have an impact on ecosystems. Dalkia supplies the main wood-fired boiler plants that it operates in France, partly through its subsidiary Bois Énergie France (BEF), which represents an annual volume of 2.6 million tonnes of wood energy in 2025. Dalkia has voluntarily committed to increasing the share of wood from PEFC- or FSC-certified forests. This indicator makes it possible to highlight the sustainability of the product throughout the chain, from the producers (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 itself the target of having more than 30% PEFC wood by 2026 and beyond.

2.3.2.5.2.2 Acting to restore and preserve natural environments

Low-water support in times of drought

See section “Actions concerning the multi-use management of freshwater resources”.

Maintenance of vegetation under and around power lines

As part of the maintenance of vegetation under and around power lines, Enedis is trialling solutions to maintain open spaces favourable to biodiversity. These environments, too small for intensive agricultural use, are rarely exploited and receive no inputs or pesticides, making them wasteland rich in biodiversity. In order to maintain these environments without intervening too often and too brutally with traditional rotary grinding machines, experiments with alternative techniques have been carried out in recent years.

Restoration actions carried out at the Group

The EDF group is committed to participating in the restoration and/or preservation of more than 30 natural areas with local partners between 2020 and 2030 (see section 2.3.2.5.3 “Targets and indicators related to biodiversity and ecosystems”). Part of these restorations concern the large water cycle, a resource on which the Group is highly dependent. Some actions pool benefits for biodiversity, regulation of the water cycle, and mitigation of carbon emissions or sequestration.

2.3.2.5.3 Targets and indicators related to biodiversity and ecosystems

As a signatory to the advocacy campaigns organised by Business for Nature for COP15 and COP16, EDF wishes to contribute to a "positive nature" world (2050 ambition of the Kunming Montreal Global Biodiversity Framework).

In line with the materiality analysis, and in particular its dependencies, the Group has set a target for the restoration of natural areas: between 2020 and 2030, EDF will have participated in the restoration and/or preservation of more than 30 natural areas[60] with local partners in order to contribute to its own resilience and to that of the regions where it operates. Restoration specifically aims to restore ecosystems (wetlands, forests, etc.) that are linked to the large water cycle, a resource on which the Group is highly dependent.

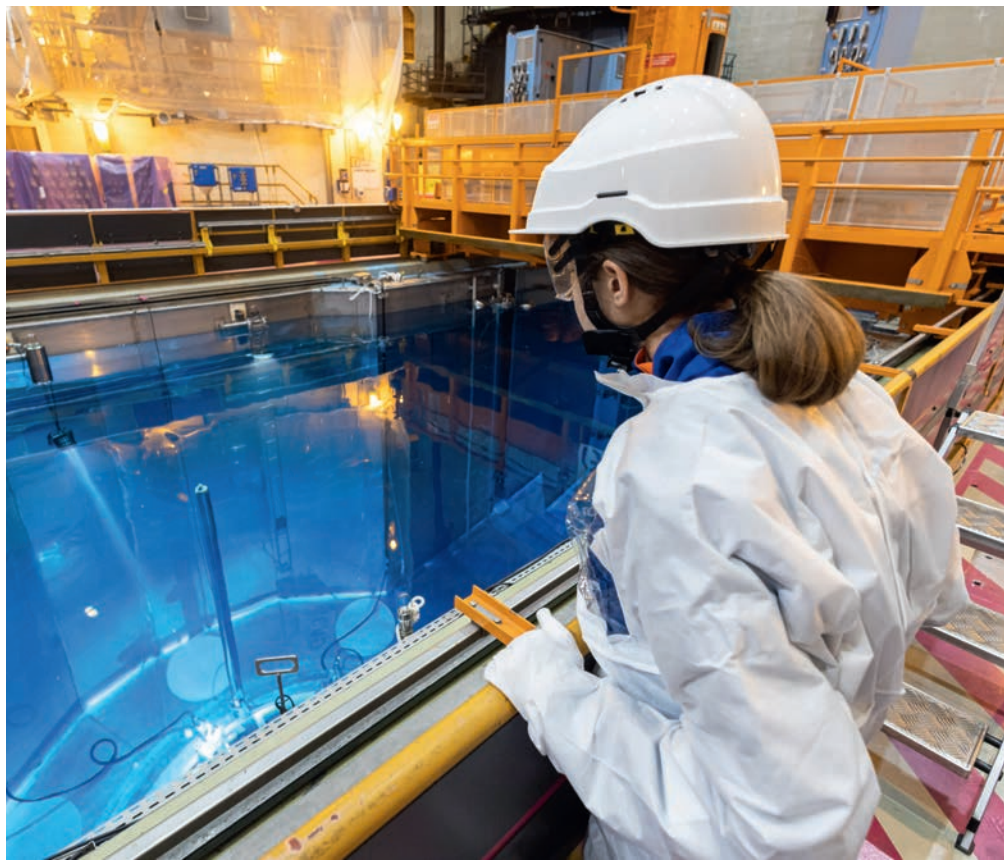
This voluntary target (unrelated to regulatory offsetting) is based on the objectives of the Kunming-Montreal global framework, which aims to conserve (Target 3) and restore (Target 2) 30% of terrestrial, aquatic and marine areas, as well as the European regulation on the restoration of nature.

Sustainability issues	Target	Reference	Review	Scope	2024	2025
Impact on ecosystems	Conserve and restore 30 sites on a voluntary basis between 2020 and 2030	2020	Annually	Group	6 sites	13 sites

See all the Group’s policies, actions and results in terms of biodiversity in section 3.2.5 “ESRS E4 - Biodiversity and ecosystems” on page 191 of the Group’s 2025 Universal Registration Document, available on the website

(60) Areas of more than 1 hectare, subject to multi-year management, ecological engineering and/or preservation actions, carried out with external partners who are experts in these actions. These actions exclude regulatory ecological offsetting actions.

2.4 Safety and health



2.4.1 *Identifying salient risks*

The mapping of the risks to the safety and health of employees and service providers is carried out by the Prevention and Health & Safety Department, which is responsible for the safety and health 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 in terms of harm to the safety and health of employees and service providers are linked to the operation of industrial facilities. Risks for consumers and local residents are also linked to the operation of industrial facilities.

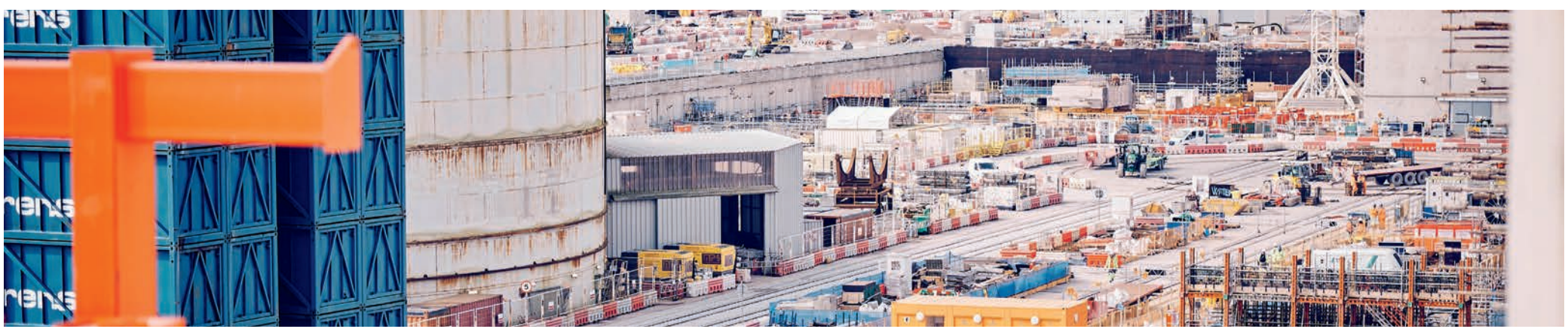
The risks to the safety and health of employees and suppliers' workers working at the Group's sites are established by the operational and functional entities based on the nature of their activity, the various hazards that may occur, and the identification of populations exposed to these dangers. These maps are enhanced with cases of accidents that have occurred, and with the multidisciplinary expertise of managers, prevention specialists, employee representatives and healthcare professionals.

The entities' single occupational risk assessment documents (*Documents uniques d'évaluation des risques professionnels* - DUERP) include all risks related to the activities, including psychosocial risks, which are assessed according to a shared methodology, adapted from the studies undertaken with the Gollac report.

Ten major safety risks were identified by the analysis of the Group's serious and fatal accidents over the last 40 years .These 10 major risks are associated with prevention rules called "The 10 vital rules of the EDF group". Their strict implementation across all Group entities saves lives. The assertion of a shared duty of vigilance towards others, and the willingness to be held accountable, completes the system for preventing irreversible situations.

Every serious and fatal incident, and every high potential event (HPE), is analysed to draw all possible lessons. An analysis of all these events makes it possible to identify similarities and recurring themes, thereby enabling the definition of annual prevention actions at Group level.

In the field of health, regular monitoring by occupational physicians and medical inspectors makes it possible to assess the health status of the employees being monitored and to implement specific actions within the framework of individual consultations.



Assessment procedure

The regular assessment of the EDF group's situation is carried out independently and in a complementary manner:

- at the operational level of each entity;
- at the level of the Prevention and Health & Safety Department;
- and through thematic or performance audits by the Group's Audit Department.

Each entity carries out its own annual self-assessment, examining its safety and health assessment through the internal control system (based on the 10 requirements of the policy), and draws on its strengths and weaknesses to define future goals. Targeted internal control actions are decided by the operational and functional entities based on their risk analysis.

In 2025, the Prevention and Health & Safety Department began a cycle of peer reviews. The department assesses the implementation of the requirements of the Group's safety and health Prevention Policy and the safety and health management system according to the BEST[61] internal standard for the entities represented on the Executive Committee, with a three-year periodicity.

Suppliers' services are assessed as soon as the tender is submitted. Each purchase incorporates safety and health levers to ensure the level of performance expected during the service. These levers are proportionate to the expected level of risk. The selection of bids that meet the expected requirements is made by considering, among the best-value criteria, a component related to safety and health, the weighting of which is adapted to the challenges of the service expected.

During the performance of the service, the EDF group's requirements are closely monitored in the field, which may, in the event of difficulties, lead first to the suspension of a project, then to a request for improvement plans from the management of the companies involved or, in the event of serious and repeated breaches, to the termination of the contract.

The EDF group's strategic industrial suppliers are also subject to specific monitoring, which may, in the event of a shortcoming in performance, lead to the establishment of a progress plan agreed between the managements of the two parties.

Risks related to safety and health

Risk category	Salient risk	Risk criticality	Negative material impact
Safety and health of employees and service providers	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
	Risk of musculoskeletal disorders and anxiety-depressive disorders, including stress.	■ ■	**ESRS S1** Own workforce **ESRS S2** Workers in the value chain
Safety and health of local communities[1]	Risk of industrial accidents, in particular nuclear and hydropower accidents.	■ ■	**ESRS S3** Affected communities **ESRS E2** Pollution **ESRS E3** Water resources
	Risk of damage to health due to impacts on air quality.	■	**ESRS S3** Affected communities **ESRS E2** Pollution

Criticality: ■ ■ ■ high ■ ■ intermediate ■ moderate

(1) The potential light and noise pollution at operational industrial sites has not been deemed to be material due to the measures put in place to prevent such pollution, in accordance with the impact studies carried out prior to any new project (see section 3.2.3 "ESRS E2 - Pollution" of the Universal Registration Document).

(61) Building Excellence in Safety Together (BEST).

2.4.2 *Principle mitigation, prevention and monitoring measures implemented*

2.4.2.1 Safety and health actions

The basis of safety and health management

The Group has a Health and Safety Prevention Policy, which was signed in April 2024 and reaffirmed at the end of 2025 with the new configuration of the Executive Committee. The goal is to eradicate serious and fatal accidents and to aim for 0 injured.

In addition to the cross-cutting integration of safety and health issues posed by the policy, 10 requirements and 10 vital rules are enacted.

The Group focuses its commitment on the 10 vital rules, which were re-examined in 2024 when the policy was updated, based on an analysis of the fatal accidents having occurred over the last 40 years. These vital rules are applicable throughout the Group.

See section 3.6.6.5.2 "Principal prevention, mitigation and monitoring measures implemented" for safety and health in the procurement approach Group's 2025 Universal Registration Document, available on the website

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

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

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.

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

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 safety and health management system in relation to the BEST reference framework, carried out by the Group's departments and companies, has now been replaced by a triennial assessment of the Group's departments through peer reviews. This change, which began in 2025, aims to strengthen the Group's level 2 control. It also allows entities to benefit from the vision and experience of their counterparts.

ISO 45001/MASE or VCA certifications

The share of employees belonging to entities with a certified management system (ISO 45001, MASE or VCA) was 59% in 2025, compared with 35.4% at the end of 2024.

"Safety Stop"

The Group's safety and health Prevention Policy specifies that when safety conditions relating to vital rules are not met, a "Site Safety Stop" must be declared to avoid exposure to risk, and the necessary actions must be taken before resuming operations, with the support of skilled personnel and management. Similarly, when in the preparatory phase it is deemed that the safety conditions provided for are not satisfactory, a "No Go" must be declared.

Since 2019, a Group Safety STOP event has been organised in October at all teams, allowing people to share information on safety and health as well as on the theme chosen at Group level. Held on 16 October 2025, it provided an opportunity to discuss the subject of safety and health in the field and in work collectives under the theme "Let's build a fair culture together".

Sharing the analysis of "high potential events"

In order to ensure the continuous improvement loop, and to maintain awareness of risk, high potential events (HPE) are collected, analysed and shared at Group level. 83% of these HPEs concern near-accidents or dangerous situations, and are therefore detected as a preventive measure against exposure to risk. The HPEs are analysed in order to avoid the repetition of events.

In 2025, 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.

Safety and Health audits

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

The Group Audit Department also carries out a safety and health assessment within the framework of the entity audits or on specific topics. Regular discussions with the Prevention and Health & Safety Department feed into the respective reviews.

The Prevention and Health & Safety Department peer reviews/level 2 controls also feed into this overall vision of safety and health at Group level.

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. Mainly based on the responses to the MyEDF survey, it identifies the risk factors specific to each group, as well as protective factors such as recognition, meaning of work, and participation in the setting of objectives.

On 20 November 2025, the Group signed the charter for mental health in the workplace, driven by the Alliance for Mental Health, in order to promote and benefit from its work.

A framework contract makes it possible to provide external support to develop training actions, provide support for groups in difficulty, manage post-traumatic shock, etc. at all levels of primary, secondary and tertiary prevention.

In 2025, a "vigilant team member" training course was deployed to enable volunteer employees (HR, managers, prevention specialists, medical teams and social partners) to better detect, understand and handle psychosocial risks. This training was set up by the Group's psychosocial risks expert and internal psychologists. Notably, it includes regular practice sharing/supervision periods. 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 implementation of these interviews is one of the requirements of the new safety and health Prevention Policy.

Lastly, a "Listening and Support" platform allows users to talk to a psychologist in complete confidentiality, 24 hours a day, 7 days a week, by telephone or *via* chat on the website. This platform, which is accessible to all Group employees in France, is also open to the employees' partners or other people living in their households.

The psychosocial risks expert, who is a clinical psychologist, manages all actions.

As in 2025, the theme of mental health was chosen in 2026 to carry out specific actions.

Musculoskeletal disorders (MSDs)

The safety and health function is strengthened through the recruitment of employees, at various levels of the company, to carry out workstation studies and define ways to reduce the arduous nature of activities. In addition to the 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. Partner companies organise warm-up sessions before starting work, as is the case on the EPR2 site in Penly.

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. As regards hydropower protection, the use of exoskeletons reduces the risk of injury during the water intake screening operations, thus 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.).

Safety and health actions related to subcontracting

Safety levers are integrated into the various stages of contracting for services and best safety is taken into account in the technical and economic assessment of the bids received during calls for tenders. Through its safety and health Prevention Policy, the EDF group has strengthened the partnership dimension to be developed by the entities between contractors and external companies. The policy requires that joint prevention visits in the field be carried out in order to improve collaboration and prevention by listening to and finding solutions with stakeholders. Representatives of service provider companies were involved in drafting the new policy. Furthermore, the Group remains committed to and involved in, on the one hand, the MASE certifications for the safety and health management systems of the companies working for the Group and, on the other hand, with the professional unions in order to benefit from their amplifying effect within their professions.

Improving working conditions

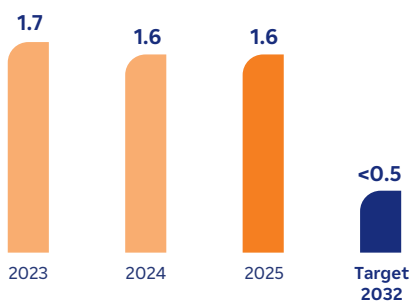
The well-being of people is a major focus of the Group's raison d'être. Various actions are implemented to support this commitment, in particular the fight against domestic and intra-marital violence as well as support for parenthood and family caregivers. The results of the annual MyEDF survey in 2025 show that 88% of employees are satisfied with the safety and health conditions at work.

Targets and indicators relating to safety and health

In order to have comparable data between Group entities and measure the accident rates directly related to the performance of activities, the EDF group has been using the Lost Time Injury Rate (**LTIR**) indicator for several years, which corresponds to the frequency rate calculation used in the UK and the US.[62] This indicator provides information on the overall level of safety of the employees of the Group and its partners during their professional activities.

The overall LTIR objective is based on a process of continuous improvement. The selected overall LTIR value of < 0.5 in 2032 was determined on the basis of the best practices observed within the Group: EDF SA and Framatome, but also among international leaders in the field of energy and in the Oil & Gas sector.

Global indicator	2025 target	2030 target	Review	Scope	2025
Employee + service provider LTIR	< 1.6	< 0.5	Annually	Group	1.5



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

(62) US OSHA Standard 29 CFR 1904.

Group key performance indicator

In 2025, the overall LTIR (EDF employees + service providers) remained stable. The overall LTIR value has been steadily declining for several years, illustrating the improvement brought about by the implementation of prevention measures for employees and service providers.

EDF deplores the fatal accidents related to professional activity that occurred in 2025, leading it to affirm as an absolute priority the need to eradicate such events by strengthening the application of the Group's 10 vital rules covering the main occupational risks (electrical, lifting, working at height, moving equipment, etc.) and by analysing high-potential incidents and LTI accidents to prevent them from happening again.

Group indicators

Group indicators	2025
Rate of employees covered by the safety and health management system *(as a %)*	59.1%
Number of deaths due to accidents directly related to professional activities – Employees	0
Number of deaths due to work-related illnesses – Employees	0
Number of deaths due to accidents directly related to professional activities – Service providers	3
Number of TRI recordable work-related accidents – Employees	1,100
Number of TRI recordable work-related accidents – Service providers	1,024
TRIR work-related accident rate – Employees	3.5%
TRIR work-related accident rate – Service providers	4.1%

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 safety and health management system provides information on the safety and health certifications (MASE, ISO 45001, etc.) contributing to the control of safety and 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 directly caused by the exposure of a worker to a physical, chemical or biological risk, or a risk resulting from the conditions in which the professional activities are carried out.

The number of deaths among partner employees due to accidents measures the number of fatal accidents of service providers directly related to the 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 work-related illnesses of subcontractors' employees because they usually occur several years after the performance of the service.

The Total Recordable Incident Rate (TRIR) represents the rate of work-related accidents with and without lost time that are recordable and linked to the professional activity of employees and service providers. This indicator, adopted in 2024, aims to enable management to implement targeted corrective and preventive actions, focusing on the accidents truly related to work-related activities which the employer can address. This definition is derived from the OSHA standard and is commonly adopted by major international groups.

In accordance with the applicable local regulations, EDF SA and ENEDIS monitor workplace accidents occurring during work and commuting, as defined by the French primary health insurance fund. In 2025, 1,045 accidents with or without lost time were recorded by EDF SA and 959 by ENEDIS.

See all the Group's policies, actions and results concerning safety and health in section 3.3.2.6 "Safety and health for all" on page 226 of the Group's 2025 Universal Registration Document, available on the website

2.4.2.2 Safety of nuclear and hydropower facilities

Nuclear safety

The Nuclear Safety and Radiation Protection Authority (*Autorité de sûreté nucléaire et de radioprotection* - ASNR) in France and the Office for Nuclear Regulation (ONR) in the United Kingdom ensure compliance with nuclear safety regulations, such as those prescribed by the French Environment Code. The safety of nuclear facilities is an absolute priority for EDF and is ensured, under the operator's primary responsibility, from design and operation to decommissioning. The "EDF group Nuclear Safety" policy was validated in 2025. It requires every Group entity to have an effective crisis management organisation that can be mobilised at any time and that trains and improves through regular exercises, notably with local and national authorities.

Given the importance of nuclear safety, clear and transparent information and communication on events and their possible impacts are promoted within the Group. This high-quality dialogue is sought and maintained with employees and their representatives, subcontractors, supervisory authorities (ASNR and ONR), local authorities, the French High Committee for Transparency and Information on Nuclear Safety[63] and all other stakeholders in nuclear safety.

The Nuclear Safety Council, chaired by the Chairman and Chief Executive Officer of EDF, meets several times a year and reviews, among other things, the EDF group's annual nuclear safety report. 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. He issues an independent opinion on nuclear safety within EDF. His annual report gives rise to directives followed up by the Nuclear Safety Council. It is made public and is available online.

Facility design

The operational safety of nuclear facilities is taken into consideration from the initial design stage, and is subject to regular monitoring, supported by a policy of workforce mobilisation and major investment programmes. The Group's nuclear safety policy is incorporated into the training provided to both EDF group employees and service providers. Nuclear safety is subject to internal controls (annual reviews, internal control and audit plans for nuclear inspection in France) and external controls (peer reviews between corporate members of WANO[64] and OSART[65] 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 the prefects in collaboration with State services and EDF.

For greater effectiveness, these plans take account of both external (flooding, etc.) and internal (fire, etc.) risks. The relevance of the alert, information and population protection system 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 ASNR. They involve EDF and public authorities, notably the prefectures. Since its first analyses following the Fukushima accident in March 2011, EDF has enhanced its crisis management organisation. It has set up a national system capable of providing rapid material and human assistance to any site experiencing a serious issue. This system, known as the Nuclear Rapid Response Unit (*Force d'action rapide nucléaire* - FARN), has been the subject of simulation exercises conducted from regional bases located in 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.

In 2025, FARN's major operational activities centred on five national exercises conducted at nuclear power plants. A large-scale exercise, bringing together a large part of the regional services, took place in June over two weeks. Sixty FARN team members deployed for six weeks in Mayotte after the passage of cyclone Chido.

In terms of major equipment purchases, all regional services are now equipped with the complete ultimate cold source convoy (SFU). This completes the acquisition of equipment for the new missions of FARN as a whole. Lastly, two new robust container-on-cradle command posts, equipped with the latest generation satellite communication systems, were acquired during the year.

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 period lasting several months – up to 24 months for key positions (safety engineer, operator, etc.) – each employee must undergo mandatory retraining. The frequency of these courses is annual, biennial or triennial, depending on the profession and area of activity.

(63) *Haut Comité pour la transparence et l'information sur la sécurité nucléaire* (High Committee for Transparency and Information on Nuclear Safety).
(64) World Association of Nuclear Operators
(65) Operational Safety Analysis Review Team

Hydropower safety

Hydropower safety at EDF consists of all the measures taken during the design, operation and maintenance of hydropower facilities, to protect people and property against water-related hazards arising from the presence or operation of the facilities.

The safety of people – general public, service providers and employees – is EDF's top priority. Hydropower safety is an essential requirement for carrying out the Group's hydropower generation activities.

EDF performs regular monitoring and maintenance of dams, contributing to hydropower safety. Hydropower safety consists of all the measures taken during the design of hydropower facilities and during their operation. It aims to protect people and property against water-related hazards due to the presence or operation of the facilities. Hydropower safety is a major, permanent concern of the producer.

It 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 France[66], 259 class A and B facilities undergo hazard assessment studies carried out every 10 and 15 years respectively. These studies consolidate an overview of the facilities and the associated countermeasures, forming part of a risk mitigation procedure.[67] The 67 largest dams are covered by a special administrative procedure (the Special Intervention Plan).

In 2025, work was carried out to prevent the risk of boulders falling on the Gnioure (Ariège) and Coiselet (Ain) dams. This required the reservoir level to be lowered as a preventive measure.

See all the Group's policies, actions and results concerning nuclear safety and hydropower safety in sections 1.4.1.1.2.2 "Nuclear safety, environment, radiation protection" and 1.4.1.3.1.3 "Hydropower safety" on pages 28 and 47, respectively, of the Group's 2025 Universal Registration Document, available on the website

2.4.2.3 Air pollution: discharges of NO_x, SO_2, dust

Actions relating to discharges of pollutants into the air (NO_x, SO_2, dust)

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. All of these actions are described in section 2.3.2.2 "Preventing and mitigating the impacts of potential discharges on air, water and soil".

See all the Group's policies, actions and results concerning air pollution in section 3.2.3.2 "Air pollution: discharges of NO_x, SO_2, dust" on page 182 of the Group's 2025 Universal Registration Document, available on the website

(66) Mainland France and French overseas départements and regions, including wholly-owned subsidiaries
(67) For further details, see the annual report of the Inspector for Hydropower Safety, available on EDF's website

2.5 Suppliers and subcontractors

2.5.1 Identifying salient risks

In accordance with the EDF group's governance, all subsidiaries must identify the salient risks relating to the duty of vigilance concerning suppliers and subcontractors. They are identified on the basis of a risk mapping covering all purchasing categories within its scope.

For example, within the EDF scope, this concerns EDF's industrial, tertiary and IT purchases, excluding fuel purchases, and a portion of the tertiary, IT and telecommunications purchases for certain subsidiaries. Every subsidiary has its own methodology, but work on gradual convergence was initiated in 2025. The shared 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 (safety and health, human rights and solidarity-based purchasing), and responsible regional development. The aim is to identify actions to be taken with suppliers at all stages of the purchasing process (strategy, contracting and market monitoring), to share them across the Group using tools such as a library of CSR levers, and ultimately to determine the level of residual risk for each purchasing category.

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 and the purchase category managers. Geographical location is also a major factor in the assessment of risk.

In parallel with the work on methodological convergence among the subsidiaries, actions to improve EDF's mapping were initiated in 2025:

- taking into account the results of CSR assessments when rating the level of risk control and calculating the residual risk by purchase category;
- enhancing CSR opportunities to identify ways to promote CSR, even on low-risk purchases.

Moreover, the risk assessment is regularly re-examined, with a particular focus, in 2025, on:

- biodiversity risks, taking into account the pressure factors defined by IPBES[68];
- the social and environmental impacts of artificial intelligence (AI) on categories such as application solutions, IT equipment, intellectual services and call centres.

For EDF, 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, in particular thanks to the allotment mechanism that facilitates access to the Group's markets. 97.4% of purchases are made in the European Union (99.3% in the European Free Trade Association[69]).

Major risks have been identified in the various purchasing areas for points relating in particular to safety and health, pollution and waste, greenhouse gas emissions, the use of rare materials and human rights. 17% of the purchasing categories analysed are classified as presenting a "major residual" risk; 30% are classified as "significant" risk; 52% are classified as "limited residual" risk.

The risk table presented below summarises the groupings of purchasing categories analysed and classified as presenting a major or significant residual risk for EDF[70], Dalkia, Framatome, and EDF power solutions. For each CSR theme, the gross risk is described; where subsidiaries diverge in their risk assessments, the highest risk is presented.

(68) The Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES), which assesses the state of biodiversity and ecosystem services, in response to requests from its member States.
(69) European Union, Switzerland and the United Kingdom notably.
(70) For EDF, the total invoicing of the groupings of purchasing categories presented was greater than €50 million in 2025.

Purchasing area	EDF	Dalkia	Framatome	EDF power solutions	Carbon neutrality and the climate	Resource conservation	Safety and health	Human rights	Salient risk	ESRS
Electricity Instrumentation and Control	✓	✓	✓		■■■	■■	■■	■■■	• Climate: energy consumption, place of manufacture, and transport. • Preserving resources: end-of-life management of equipment, pollution and impact on biodiversity. • Safety and health: 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.	E1 E4 E5 S2 S3
Civil engineering, decommissioning and decontamination	✓	✓		✓	■■■	■■	■■	■■	• Climate: significant emissions related to concrete production. • Preserving resources: risks of soil pollution, volume and traceability of waste Noise and visual pollution. • Safety and health: use of construction site equipment and explosives, handling and heavy loads. • Human rights: legality of labour, working conditions on construction sites.	E1 E2 E3 S2 S3
Heavy lifting systems	✓	✓	✓	✓	■■	■■	■■	■	• Climate: energy consumption for the extraction and smelting of minerals (metal, steel). • Preserving resources: end-of-life management of equipment, some of which may be radioactive. • Safety and health: working in factories and on construction sites, handling heavy loads.	E1 E5 S2
Non-destructive controls/ testing and maintenance in an industrial environment	✓				■	■■	■■	■■	• Preserving resources: management of electronic waste. • Safety and health: exposure to radiation, risk of falls, heavy loads Psychosocial risks related to specialist service providers' mobility, the pressure of deadlines and non-standard working hours. • Human rights: mineral extraction conditions in certain countries for the supply of electronic components.	E5 S2 S3
Industrial goods and services	✓	✓	✓	✓	■■	■■■	■■■	■■■	• Climate: CO_2 emissions related to the transport of equipment. • Preserving resources: air, water and soil pollution during the manufacturing phase, notably concerning clothing. Damage to biodiversity. Manufacturing and product end-of-life waste. • Safety and health: risk of falls, handling of heavy objects and exposure to chemicals. • Human rights: forced labour, child labour in the areas where equipment is manufactured.	E1 E2 E3 E4 E5 S2 S3

Purchasing area	EDF	Dalkia	Framatome	EDF power solutions	Carbon neutrality and the climate	Resource conservation	Safety and health	Human rights	Salient risk	ESRS
IT and telecom equipment	✓	✓	✓	✓	■■	■■	■	■■■	• Climate: CO_2 emissions related to the manufacturing location and transport of equipment. • Preserving resources: electrical and electronic waste, extraction of rare metals. • Human rights: child labour at manufacturing sites, notably for small equipment such as smartphones.	E1 E5 S2 S3
IT solutions, publishing, hosting and support	✓	✓		✓	■■	■■	■	■■	• Climate: significant increase in CO_2 emissions linked to the proliferation of data centres with the rise of AI. • Preserving resources: proliferation of data centres and equipment linked to the rise of AI. • Human rights: legality of labour, risks of discrimination and harassment due to suppliers' global and offshore locations.	E1 E2 E1 S2
Work on new and existing buildings	✓	✓			■■	■■	■■	■	• Climate: concrete manufacturing, transport. • Preserving resources: waste generation. • Safety and health: exposure to chemicals, working at height, physical risks.	E1 E5 S2
Production line for solar panels and batteries				✓	■■	■■	■■	■■■	• Climate: CO_2 emissions related to the manufacturing location and transport of equipment. • Preserving resources: water consumption in water-stressed areas, water and soil pollution during the manufacturing and extraction phase for certain minerals. • Safety and health: unsuitable working conditions, exposure to chemicals. • Human rights: working conditions, forced labour, risk of discrimination in certain mineral production and extraction areas.	E1 E2 E3 S2 S3
Forging, boiler making, piping, welding			✓		■■	■■	■■	■	• Climate: extraction and manufacture of energy-intensive metal raw materials, notably fossil fuels. • Preserving resources: partial recycling due to the use of metals in amalgam form, strong impact on biodiversity due to land use during the extraction phase, water consumption. • Safety and health: accident-inducing metal extraction activities and exposure to hazardous substances. • Human rights: risk of forced labour for the extraction of certain critical metals.	E1 E2 E3 E4 E5 S2 S3

Purchasing area	EDF	Dalkia	Framatome	EDF power solutions	Carbon neutrality and the climate	Resource conservation	Safety and health	Human rights	Salient risk	ESRS
Raw materials and semi-finished products			✓		■■	■■	■■	■	• Climate: extraction of energy-intensive minerals, notably fossil fuels, manufacture of industrial gases from fossil fuels. • Preserving resources: partial recycling due to the use of metals in amalgam form, strong impact on biodiversity due to land use during the extraction phase, pollution and use of acidic products, water consumption. • Safety and health: accident-inducing metal extraction activities and exposure to hazardous substances. • Human rights: extraction of certain minerals presenting a risk of financing armed conflicts, harm to local populations.	E1 E2 E3 E4 E5 S2 S3
Engineering, Procurement and Construction (EPC) contracts				✓	■■	■■	■■■	■■■	• Climate: energy consumption, emissions related to the transport and manufacture of materials. • Preserving resources: water consumption on construction sites, end-of-life management of equipment, risk of pollution and impacts on biodiversity, generation of inert substances and hazardous waste on construction sites. • Safety and health: working at height, lifting, movement of machinery, electrical work and co-activity at the construction site. • Human rights: international subcontracting, legality and working conditions, forced labour and child labour.	E1 E2 E3 E4 E5 S2 S3

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

2.5.2 *Main prevention, mitigation and monitoring measures implemented*

2.5.2.1 Supplier and Procurement Policy

In 2025, the Group deployed its new Supplier and Purchasing Policy. It fosters the responsible procurement approach through its **four pillars:**

- purchasing, an essential driver of the Group's performance: responsible, sustainable and socially inclusive procurement;
- managing supplier performance is crucial to the Group's success;
- performance of the procurement process: from the emergence of the need to the end of the relationship with the supplier;
- procurement data, the keys to success.

Every Group entity sets out the main principles of this policy through an action plan and indicators. The Group's procurement network, which brings together the major operators in the procurement teams (EDF SA, Enedis, Framatome, EDF Energy, Dalkia, EDF power solutions, Luminus, Edison and Arabelle Solutions), steers the implementation of the Supplier and Procurement Policy through a Group Procurement Management Committee working on performance on the basis of a shared and prioritised roadmap. The Group purchasing network operates in accordance with the principle of subsidiarity in terms of the governance of the subsidiaries and the management independence of the network operators.

The EDF group's Supplier and Procurement Policy emphasises its commitment to maintaining a performing and lasting partnership with its suppliers. It sets out the Group's raison d'être and CSR commitments as they relate to responsible procurement, including in particular the Group's commitments to human rights, to reducing environmental impacts, to socially responsible procurement, to local anchoring and to raising awareness among suppliers.

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

"Responsible supplier relations and procurement" label

The objective of the Responsible Supplier Relations and Procurement label (RFAR) is to develop the relations between customers and suppliers in order to build a lasting and balanced relationship between them, based on mutual trust. The charter is based on commitments which include the integration of environmental and societal issues in procurement including human rights.

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 Organisation for Economic Co-operation 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 safety and health, ethical behaviour towards customers, and respect for the environment.

This charter, available on the EDF website,[71] was rolled out in 2023 among the suppliers of EDF and Dalkia. An equivalent charter is used at Framatome and at Enedis.

In other Group companies

When they do not directly apply the systems described above, the major business lines or subsidiaries have equivalent commitments adapted to their specific industrial or geographical features.

In the United Kingdom, through EDF Energy's CSR and ethics requirements manual, EDF requires that its supply chain partners comply with the same high standards in terms of sustainability, responsibility and ethical conduct as those that it requires from its own employees and business activities. EDF Energy requires that all its suppliers respect the fundamental employment rights, as defined in the Universal Declaration of Human Rights (UDHR), the conventions of the International Labour Organization (ILO) and the United Nations Global Compact (UNGP).

Suppliers must also implement robust measures to eliminate all forms of child labour or slavery, publish an annual statement on modern slavery, where applicable, and comply with the minimum wage legislation in the countries where they operate. In the United Kingdom, EDF Energy has a Modern Slavery Statement covering all its employees and purchasing. This statement complies with the Modern Slavery Act and is published on EDF Energy's website. EDF Energy also contributed to the register of declarations of this legislation.

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

2.5.2.2 Responsible procurement approach

The EDF group's responsible procurement policy is at the heart of the Group's social and environmental responsibility practices in its supply chain.

The responsible procurement approach is adapted to all Group entities by the procurement network managed by the Group procurement Department, which brings together the major operators in the procurement networks (EDF SA, Enedis, Framatome, EDF Energy, Dalkia, EDF power solutions, Luminus, Edison and Arabelle Solutions). The Group Procurement Department is responsible for implementing the Supplier and Procurement Policy. The Group's responsible procurement 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 procurement categories relating to the themes of the Group's CSR policy;
- integrating CSR levers at all stages of the procurement process (requirements, selection criteria, comparison criteria, contractual clauses or productivity partnerships);
- supporting suppliers during the contractual relationship;
- monitoring and measuring the CSR performance of procurement.

The main action levers at Group level, implemented by the responsible procurement network, and currently being rolled out at the subsidiaries, are as follows:

- mapping of risks and opportunities by supplier or procurement category: this incorporates gross risks and opportunities (taking into account the nature of the goods and services purchased, as well as their geographical origin) and net risks and opportunities (taking into account the specific measures and actions put in place for the goods and services purchased);
- contractual templates (including CSR charters between the Group and its suppliers), incorporating the social and environmental requirements imposed on all Group suppliers. Where contractual templates are specific to a Group entity in terms of form, the fundamentals in terms of human rights and environmental rights remain essentially the same;
- a library of CSR levers (a lever is defined as a technical requirement, supplier selection criterion, specific contractual clause or partnership during the contract) organised by type of goods or service, according to the pillars of the CSR policy and the issues identified during the risk mapping exercise. It provides concrete examples of responsible and sustainable performance to be integrated into the procurement act. The library contains approximately 300 levers for 30 procurement categories or segments;
- a training catalogue for all stakeholders in the procurement function, from the specifications to the end of the contract;
- a supplier qualification, audit and assessment system.

These Group-wide action levers are broken down and supplemented by the specific actions taken by each entity.

Through the implementation of these levers, at the end of 2025 more than 95% of purchases presenting challenges had an environmental lever (within the scope of EDF SA, Framatome and Enedis), and 100% had performance clauses related to safety and health (within the scope of EDF SA, Dalkia, Edison, Enedis, Framatome and Luminus).

2.5.2.3 Other methods applied at the Group's main subsidiaries

The subsidiaries have equivalent commitment methods adapted to their specific industrial or geographical characteristics, the main ones being as follows:

EDF power solutions

EDF power solutions maps the CSR risks across all of its strategic supplies for renewable energy sources (solar, wind and batteries), taking into account country risks related to suppliers' generation sites, as well as their possible reputational risks.

EDF power solutions' responsible procurement is based on two pillars:

- the supplier qualification process, which takes place in two stages:
  - a request for information phase, during which the 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 suppliers' production sites to verify that the practices adopted correspond to EDF power solutions' standards;
- the environmental and social clauses in contracts: when they enter into the agreement, the service providers undertake to abide by EDF power solutions' environmental and societal requirements and to apply them 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 procurement process, from concession specifications and the definition of certain supplier panels, to contractualisation.

Framatome has a CSR risk mapping of its supplies that includes the risks related to geographic areas and procurement categories. The procurement categories metals, works and civil engineering, transport, electronic equipment and workwear were selected as presenting challenges.

The Supply Chain Department contributes to Framatome's safety plan and therefore to the improvement of the results on accidents with and without lost time in 2025. It also contributes to the energy and water savings plan, with sobriety objectives to be included in the offerings in 2026.

For each purchase of more than €600 thousand, CSR levers are systematically implemented, targeting in particular the categories and countries at risk. A grid of levers, based on the procurement network library, helps specifiers and buyers to determine the most binding levers and to challenge suppliers in the technical prescription or in the selection criteria.

Dalkia

Dalkia's Procurement Department incorporates CSR during the subcontractor qualification process through questions concerning their carbon footprint, their non-financial certification, as well as labour matters, including notably occupational safety and health.

Dalkia has also mapped its CSR risks by procurement segment. This map covers the environment, labour relations, working conditions, human rights, as well as ethics and compliance.

The library of levers produced by the procurement network has been transposed to Dalkia's specific activities, in particular the earthworks activity for the deployment of heating networks and the supply of pre-insulated steel pipes.

Edison

Edison has implemented a supplier qualification process. In addition to this process, Edison's supplier management tool includes a risk mapping that includes CSR issues. CSR levers are also integrated into all phases of the contracting process: in calls for tenders *via* selection criteria, in contractual templates, and in performance reviews involving Edison and its suppliers.

As regards supplier commitment activities, in November 2025 Edison organised the "Sustainable Procurement Day", an event designed to engage the entire ecosystem of suppliers and stakeholders in Edison's supply chain (partners, buyers and employees) around key sustainability issues. The event also provided an opportunity to discuss the Sustainable Procurement Academy, a platform created in partnership with Altis (Università Cattolica del Sacro Cuore in Milan) and dedicated to Edison's suppliers. This platform provides educational resources and specialised tools on the environment, social sustainability and governance, as well as on Edison's sustainability and investment policies and strategies.

Luminus

The Luminus procurement 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. The suppliers must also submit their accident statistics, which is used in the selection process. For construction projects, Luminus also requires safety certification.

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

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

EDF in the United Kingdom

In the United Kingdom, EDF Energy employs around 12,000 people and relies on a supply chain of nearly 3,400 suppliers.

In the supply chain, the potential risks related to modern slavery and human trafficking are assessed to identify the most exposed procurement network.

Suppliers must comply with a set of processes, including the requirement to conduct a risk self-assessment aligned with the ten principles of the United Nations Global Compact. EDF Energy encourages them to adopt a continuous improvement approach to their social and environmental practices. EDF Energy also provides its suppliers with several resources, such as the Supplier Guide to Diversity and Inclusion and the Sustainability and Ethics Requirements Manual, which are provided as part of the Supplier Relationship Management process. Moreover, compliance with the United Nations Global Compact is verified during the supplier onboarding process. Furthermore, the obligations relating to modern slavery are incorporated from the pre-contractual phase onwards, and suppliers are assessed at all stages of the procurement cycle, from qualification to contract performance.

In addition, the contractual agreements require suppliers to comply with the laws and policies applicable to the EDF group. Additional checks are carried out throughout the relationship between EDF and the supplier, in proportion to its risk profile and level of criticality. Integrity checks are also carried out on key suppliers to ensure that they comply with the EDF group's minimum standards. Those belonging to this category are subject to regular audits, taking into account their level of risk and financial characteristics.

Arabelle Solutions

The obligations related to the duty of vigilance, carried out during the supplier reference process, involve several controls, 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 involved. This analysis is carried out during the pre-qualification process, by the Environment safety and health (EHS) Department in charge of approval. Additional controls relating to human rights are also carried out as part of this process. Lastly, Arabelle Solutions' General Terms and Conditions of Procurement include a specific section incorporating these requirements.

Integration of environmental issues and safety and health into the procurement process:

2.3.2.1.2 "Actions and resources related to climate change policies"

2.3.2.4.2 "Actions related to freshwater withdrawals and consumption"

2.3.2.5.2 "Actions and resources related to biodiversity and ecosystems"

2.3.2.3.2.1 "Actions and resources related to incoming resources"

2.4.2.3 "Air pollution: discharges of NO_x, SO_2, dust"

2.5.2.4 Procurement stakeholder training

The training offering for all those involved in the Group's procurement function contains several types of training materials:

- e-learning modules on responsible procurement, human rights (in collaboration with the "Entreprises pour les droits de l'homme" association) and the duty of vigilance;
- e-learning modules from external training databases such as the Axa Climate School;
- online training modules on responsible procurement;
- a collaborative game immersing participants in the concrete case of a purchase requiring the selection of the best bid in term of CSR levers.

Practices at EDF

Since 2025, all new hires in the procurement functions have followed a mandatory initial training course, including a module dedicated to CSR. These e-learning courses are also included in the onboarding guide.

In addition, EDF's 2025 annual industrial procurement action plan includes the mandatory participation of all buyers in the responsible procurement game. The prescribing entities are also encouraged to roll out the game in their unit.

Moreover, CSR is recognised by the procurement teams as a skill monitored by Human Resources. All employees have a mandatory annual individual CSR objective, as well as an individual skills assessment by their manager and an associated training plan according to their position.

As regards suppliers, they are made aware of EDF's challenges and ambitions as part of the CSR Suppliers Club, GIFEN[72] and the CAPTEN[73] project.

2.5.2.5 Suppliers' CSR commitments

The procurement network is the main player in suppliers' commitment to CSR, through requirements and proactive support. In all its contractual templates, the Group imposes the following requirements on its suppliers:

- compliance with the applicable environmental and social regulations, in particular the ILO rules and the requirements of the law on the duty of vigilance;
- being subject to systems for assessing their CSR practices and in the subcontracting chain (through documentary audits or on-site audits, during qualification or during the performance of the contract);
- sanctions and the possibility of terminating a current contract in the event of non-compliance with the aforementioned requirements.

Practices at EDF

Prior to the contracting process, EDF's nuclear division requires each supplier to undergo a qualification process[74] in accordance with the regulations governing nuclear facilities. The qualification covers all topics of importance to the Group (safety and health, quality, compliance) and includes a section dedicated to CSR. If a supplier does not meet the qualification requirements, it cannot apply for contracts. If, during the performance of a contract, the supplier fails to meet the requirements for qualification renewal, it will be required to implement a compliance action plan or, in the most serious cases, the contract will be terminated.

(72) *Groupement des Industriels Français de l'Énergie Nucléaire*, a grouping bringing together the companies operating nuclear facilities, as well as the professional organisations and associations covering all types of nuclear industrial and power generation activities.
(73) Network of industry players in the nuclear sector.
(74) In accordance with public procurement rules and practices in France and Europe, this qualification process is restricted to industrial purchases in the nuclear sector.

For suppliers in the industrial or tertiary segments, EDF submits a panel of 1,000 priority suppliers, selected according to the volume of purchases and the CSR risks of their business sector, for a documentary audit. Every year, between 400 and 500 suppliers are asked for an assessment that is valid for three years. Since 2024, the assessment has included 19 questions, accompanied by evidence, covering all areas of the Group's CSR policy. This format makes it possible to target the main expectations and facilitates access for small-, medium- or intermediate-sized companies that do not have a dedicated CSR structure. The responses to the questionnaire are verified by an independent third party. Since the implementation of the questionnaire, 50% of the companies in the panel have been re-assessed (plus other companies outside the panel). More than 84% of the companies assessed comply with the safety and health requirements, around 74% with the human rights requirements, around 58% with the decarbonisation practices, and just under 49% with the climate change adaptation practices. Approximately 47% of the suppliers comply with all of the Group's requirements.

Suppliers and their subcontractors in a contractual relationship with EDF are also subject to the implementation of on-site CSR audits. These stringent and in-depth audits are planned:

- for a sample of contracts identified as at-risk during the procurement risk mapping;
- at the request of members of the procurement function who have identified a specific risk on a contract;
- in the event of a duty of vigilance alert.

The audits last for an average of two days, are carried out by an approved independent third party, and are based on an audit grid that covers all areas of the Group's CSR policy and duty of vigilance requirements. Depending on the result of the audit, they may result in a compliance action plan accompanied by follow-up audits, or in the termination of the contract in the event of a major breach. In 2025, the audit campaigns focused notably on occupant services in real estate (risks related to working conditions), workwear and PPE (continuous monitoring of suppliers in this segment presenting high social and environmental challenges in exposed countries), and external customer relations centres (risks related to working conditions).

In terms of proactive supplier engagement, EDF carries out **three main actions:**

- **the CSR Suppliers' Club** offers collective intelligence workshops over a period of six months, bringing together suppliers in the same procurement segment to share the challenges of the sector, identify best practices and define the procurement levers to be generalised in EDF contracts. In 2025, workshops were conducted on concrete, steel, IT hardware, IT software, catering, heating and ventilation, workwear and personal protective equipment (PPE), chemicals and waste. About a hundred suppliers were involved and enabled EDF to specify about 50 clauses or criteria to be included in contracts;
- **Pacte PME's Decarbonisation Alliance:** the Pacte PME association provides small- and medium-sized companies with support on strategic issues to help them develop their business by integrating the practices of intermediate-sized companies or large companies. The association's actions are financed by the French State and by a network of large companies of which EDF and Enedis are part. The decarbonisation alliance is a project to support SMEs in the decarbonisation of their activities, by making environmental consulting firms available at reduced prices to carry out carbon assessments and action plans to reduce emissions. 46 SMEs that supply EDF have committed themselves through the signing of the association's charter;
- **coordination of business networks:** EDF's industrial purchases, notably through GIFEN, mobilise partners in the nuclear sector on responsible procurement issues.

In November 2025, during the World Nuclear Exhibition, the players in the sector committed to signing the Supplier Relations and Responsible Procurement Charter. Similarly, the procurement and digital functions collaborate with suppliers on the subject of responsible digital technology.

2.5.2.6 Responsibility in the fuel supply chain

Uranium supply chain

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 under good environmental, social and societal conditions. The assessment method and grid were developed with the World Nuclear Association (WNA)(75). 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, safety and health, 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. This framework takes into account the issues of human rights and fundamental freedoms (human rights, whistleblowing register, rights of indigenous peoples and radiation protection), safety and health of people and the environment, in the broadest sense of the term (greenhouse gases, water, biodiversity waste, site clean-up after extraction).

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 the latter, the most recurrent relate to safety and health (radiation protection, display of instructions with the provision and wearing of appropriate personal protective equipment, improvement of the safety culture with appropriate training), reminders of the need to analyse the causes and trace the corrective actions after any incident or accident, actions to monitor and control the environmental footprint (CO_2 emissions, water, waste and effluent management), working and accommodation conditions (notably at "base camps"), supplier assessments and the correction of observed discrepancies (calibration of measuring instruments, traceability of the certifications issued). The audit recommendations are incorporated into suppliers' action and continuous improvement plans. Each supplier is audited every three years.

Coal supply chain

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 purchasing 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. This framework takes into account general performance requirements, including management systems, but also performance requirements concerning:

- ethics and transparency;
- human and labour rights (such as the fight against forced labour and child labour, the right to an adequate wage);
- social issues (including safety and health); and
- the environment.

JERA Trading, an EDF supplier, has become a member of Bettercoal. No transactions were carried out in 2025.

Gas supply chain

Edison and the EDF group's Gas Asset Management Department (DGAG) implement a business integrity assessment process that incorporates human rights considerations. These integrity checks are carried out through an extensive process of knowing the potential counterpart (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. Particular attention is paid to compliance with international sanctions.

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 assessment applies to all of the Group's contracts, and in particular to its 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 the 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.

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

Biomass supply chain

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 include an inspection or vetting carried out with the support of Rightship's services. This company assesses vessels according to its vetting framework which includes various criteria relating 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 Maritime Labour Convention (MLC) of 2006 or, if so is the case, checking that it complies with an equivalent system.

In addition, the vessels chartered by Edison for the transport of small-scale LNG[76], and flying the French flag, and the Contracting State, must comply, for all aspects relating 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 LNG FOB[77] contracts, also flying the French flag, the contracts stipulate that the employment conditions of the ship's staff and crew must comply 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 safety and health of employees and the environmental impact of vessels, including spills at sea and pollutant emissions.

Monitoring indicators

The number of supplier assessments carried out by the procurement network in 2025 is presented in the table below. With around 130,000 active suppliers over the past two years, this number reflects the efforts made by the procurement network to secure the Group's supply chain in a manner commensurate with the challenges involved.

Sustainability issues	Related indicators	Review	Scope	Results
Supplier support	Number of supplier assessments[1]	Annually	EDF SA, Arabelle Solutions, Dalkia in France, EDF power solutions, Edison, Enedis, Framatome, Luminus	**5,083** assessments with a CSR component **681** CSR assessments **67** CSR audits

(1) The number of audits and assessments is defined by distinguishing between remote documentary checks with evidence verified by a third party (assessments) and on-site controls by a certified third party (audits), and between generic controls that include a CSR component and controls dedicated to CSR topics. The audits and assessments are conducted either before the start of a contract (supplier qualification process) or during the performance of a contract.

(76) Small-scale LNG (SSLNG) generally refers to LNG-related facilities (reception terminals, storage units, vessels, etc.) with similar characteristics but of smaller scale than conventional LNG infrastructures.
(77) FOB, or "free on board", means that the seller provides the goods without transport and insurance costs.

Alerting and monitoring

3.1 Group whistleblowing system

3.1.1 Scope

The **Group's ethics, compliance and duty of vigilance whistleblowing procedure** applies to all EDF group entities.

In order to make alert-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 alerts filed pursuant to the Sapin II Law and the Duty of Vigilance Law, as well as all alerts filed by employees, external staff 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 of the EDF group procedure for collecting and processing alerts, appointed by the Executive Committee, is the Group Ethics and Compliance Department.[78]

Information on the whistleblowing system is available through:

- **the EDF website**[79], which is accessible to everyone (external employees, suppliers, subcontractors, customers, residents and other third parties, 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;
- **the intranet,** with a video on the Group whistleblowing system, the Whistleblowing Support Guide, and the link to the Group platform;
- **the sites**, where a "How to file an alert?" poster explains which employees can file an alert, the facts that may be reported, the respect for confidentiality and the protection of the whistleblower, as well as the procedures for accessing the whistleblowing system (two QR codes provide direct access to the support guide and the outsourced platform).

In addition, each entity's Ethics and Compliance Manager (EDF Departments and subsidiaries) is responsible for 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.

(78) Decree of 4 October 2022: the referee body is responsible for receiving the alert and processing it in compliance with the procedure. This referee is appointed by the Company.
(79) www.edf.fr/en/the-edf-group/taking-action-as-a-responsible-company/ethics-and-compliance-programme/whistleblowing-system

3.1.2 System

Accessibility of the system

The Group whistleblowing system, managed from an independent server, 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 file an alert 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. For certain large international projects, a local whistleblowing system is set up.

Reporting wrondgoing

The EDF group whistleblowing procedure allows its users 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 serious risk or infringement of human rights and fundamental freedoms, the safety and health of people or the environment, falling under the EDF group's scope of responsibility and its business relations.

Analysis of the admissibility of reports

Once the alert has been filed, the whistleblower will receive a confirmation within seven days. Whistleblowers can submit reports anonymously in countries where this is authorised. These anonymous reports are admissible as long as the factual elements are sufficiently detailed and precise to demonstrate the reality of the facts reported.

Each alert is subject to an admissibility review by the Group Ethics and Compliance Department's Alerts Committee in order to determine, before an investigation of the reported facts is launched, whether it meets the criteria and whether the appropriate protection regime can be identified.

During the admissibility review phase, the recipient of the alert may discuss the matter with the whistleblower and call on experts (Group Ethics and Compliance Department, Legal Department, Ethics and Compliance Officers, Duty of Vigilance Managers) to obtain any additional information necessary for the finalisation of the admissibility analysis.

Processing of admissible reports

Upon confirmation of the admissibility of the alert, the investigating officer appointed signs a specific confidentiality undertaking and has a maximum of three months within which to communicate to the whistleblower information on the measures envisaged or taken in order to remedy the alert filed, and on the reasons for said measures.

The investigation of the reported facts (verification of the facts, interviews of the persons concerned, search for evidence, etc.) is carried out with the support of business experts, the ethics and compliance managers of the entities or subsidiaries, the support departments (the Ethics and Compliance Department, the Human Resources Department, the Security and Economic Intelligence Department, the Legal Department, the Audit Department, etc.) and, when necessary, external consultants. These experts are bound by the same strict confidentiality obligations (with the prior signature of a confidentiality undertaking).

Upon completion of the investigation of the facts, if the facts reported are found to be true, an action plan is implemented. The whistleblowing alert will be closed only upon complete fulfilment of the related action plan.

Protection of whistleblowers: mechanisms in place to identify, report and investigate non-compliance/unlawful behaviour

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 bodies, the revised whistleblowing procedure came into force on 1 June 2023.

This whistleblowing procedure guarantees protection against any retaliation or discriminatory measures against any person filing an alert. The Group Ethics and Compliance Department is responsible for overseeing and monitoring the implementation of this procedure, and for archiving data in order to safeguard the whistleblower.

3.1.3 2025 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 Group Ethics and Compliance Department has consolidated all admissible alerts filed in 2025 within the EDF group and Enedis (*via* the Group system or any other channel).

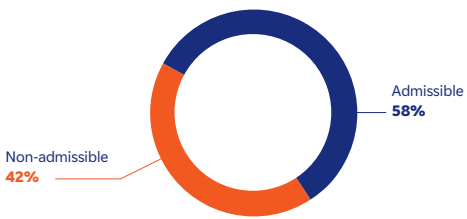
In 2025, 735 admissible alerts were filed (including 160 through the Group whistleblowing system). More alerts were received from subsidiaries than in 2024, proof of the increased awareness of the system throughout the Group. 468 alerts concerned incidents located in France and 267 abroad. 180 alerts concerned EDF and 555 the Group's subsidiaries. 46% of the alerts related to harassment and/or discrimination. In 2025, 65% of the alerts processed were sufficiently detailed to give rise to corrective actions or disciplinary sanctions (20 dismissals for proven harassment). 20% of the alerts could not be proven but nevertheless resulted in process improvement actions.

	Admissible alerts, including all types of stakeholders concerned	
Types of alerts	**2024**	**2025**
Rights and protection of individuals	46	102
of which human rights (including safety and health)	1	45
Harassment – discrimination	203	337
Fraud – corruption and conflicts of interest	139	204
Other categories	61	92

	Admissible alerts	
Types of stakeholders involved in human rights alerts:	**in 2024**	**in 2025**
Total human rights alerts	1	45
• of which workers in the value chain	1	45
• of which affected communities	0	0
• of which consumers or end-users	0	0

For these 2025 results, the following should be noted:

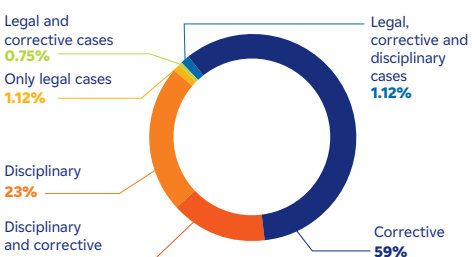
Alerts in the Group system



Results of investigations following alerts

Whistleblower's relationship with the Group (all channels combined)

Measures taken following alerts (all channels combined)

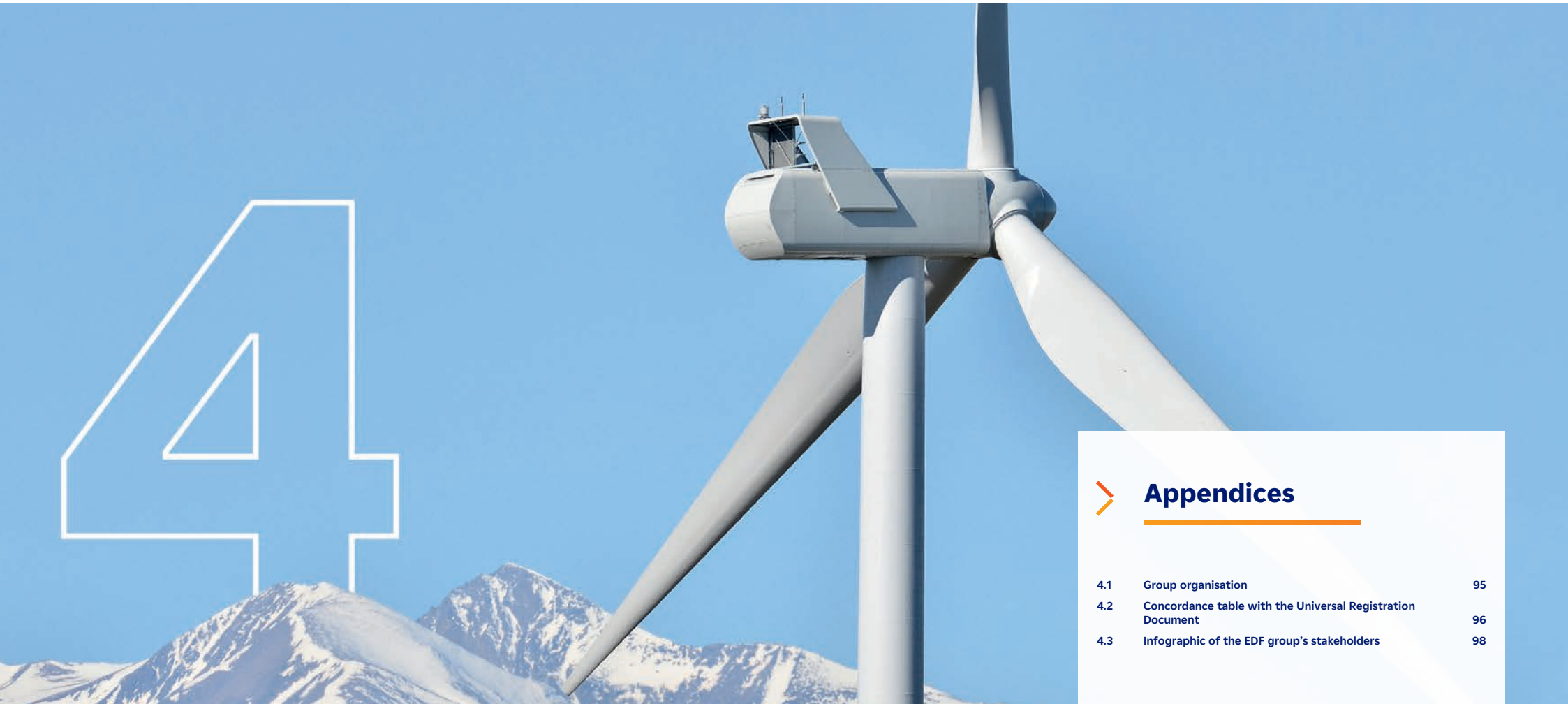


3.2 Monitoring system

The Group's vigilance mission is working to further enhance the monitoring framework of the vigilance plan as part of a continuous improvement approach.

The monitoring of the system is based on several processes:

- the governance of the vigilance plan and notably the Steering Committee, as well as the network of Duty of Vigilance Managers (see section 1.2 "Governance, oversight and stakeholder involvement");
- the monitoring of the actions presented to the Global Committee for Dialogue on Social and Environmental Responsibility (see section 1.2 "Governance, oversight and stakeholder involvement");
- the annual internal control, which dedicates a theme to the duty of vigilance, associated with requirements. The latter ask executives to implement a system adapted to their entity and their projects, as well as to appoint a Duty of Vigilance Manager in the entity for which they are responsible;
- the internal audits, conducted by the Group Audit Department, at the various entities. In 2025, an audit was carried out on certain international activities, covering, among other things, the duty of vigilance, resulting in proposals for improvement;
- the alerts are handled by the team in charge of the duty of vigilance, which also make it possible to assess the procedures in place and initiate new control actions;
- lastly, each part of this vigilance plan proposes indicators that also make it possible to monitor the effectiveness of the actions presented (see sections 2.2 "Human rights and fundamental freedoms", 2.3 "Environment", 2.4 "Safety and health" and 2.5 "Suppliers and subcontractors").



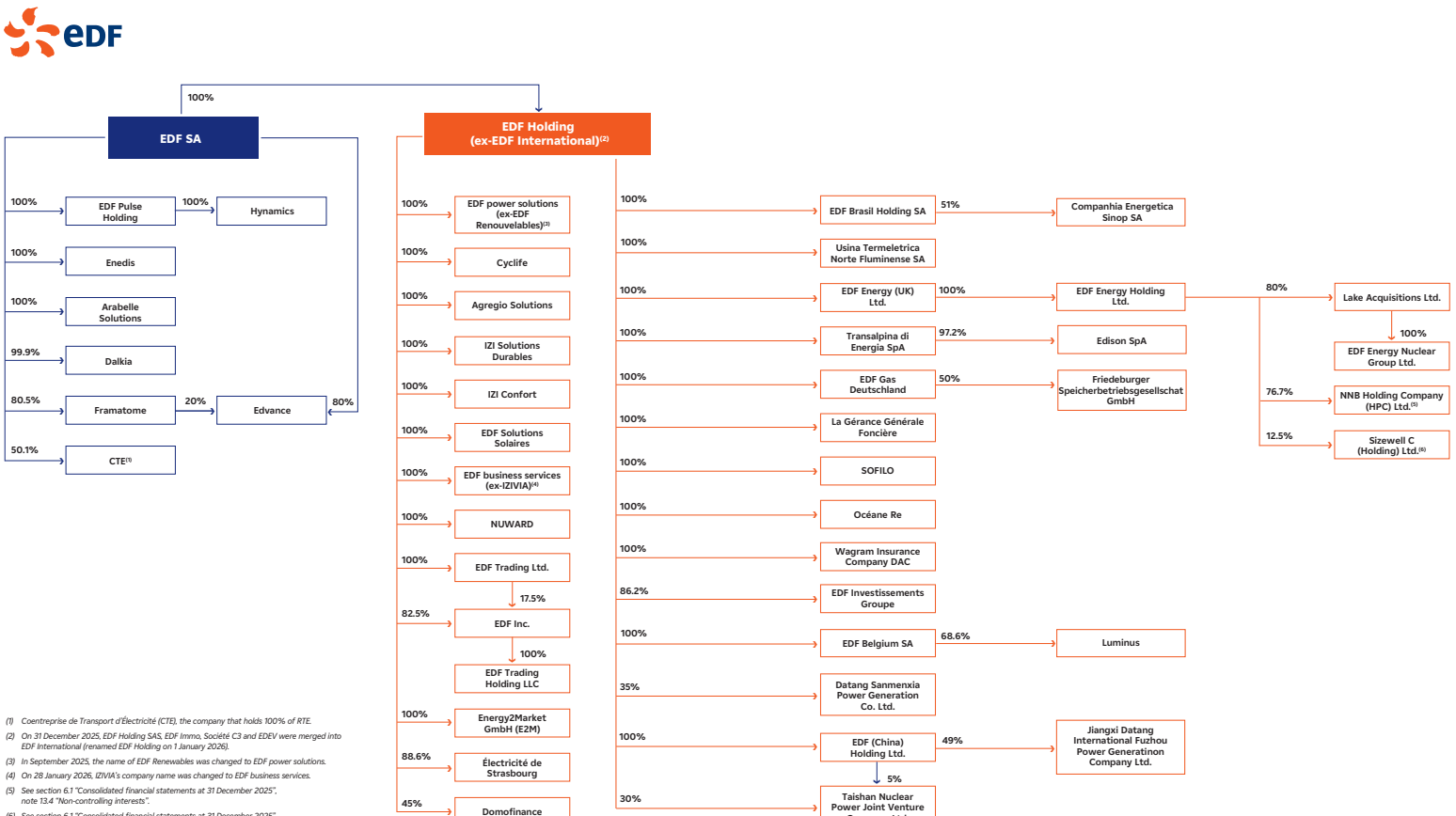
4

Appendices

4.1 Group organisation

A simplified organisation chart of the Group at 31 December 2025 is presented beside. 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 mentioned in section 6.1 "Consolidated financial statements at 31 December 2025", note 24 "Main companies in the scope of consolidation at 31 December 2025". The changes in the 2025 scope are discussed in section 6.1 "Consolidated financial statements at 31 December 2025", note 3.1 "Changes in the scope of consolidation".

See section 1.2.1 "Structure of the Group" of the Group's 2025 Universal Registration Document, available on the Group's website



(1) Coentreprise de Transport d'Électricité (CTE), the company that holds 100% of RTE.
(2) On 31 December 2025, EDF Holding SAS, EDF Immo, Société C3 and EDEV were merged into EDF International (renamed EDF Holding on 1 January 2026).
(3) In September 2025, the name of EDF Renewables was changed to EDF power solutions.
(4) On 28 January 2026, IZIVIA's company name was changed to EDF business services.
(5) See section 6.1 "Consolidated financial statements at 31 December 2025", note 13.4 "Non-controlling interests".
(6) See section 6.1 "Consolidated financial statements at 31 December 2025", note 11 "Investments in associates and joint ventures".

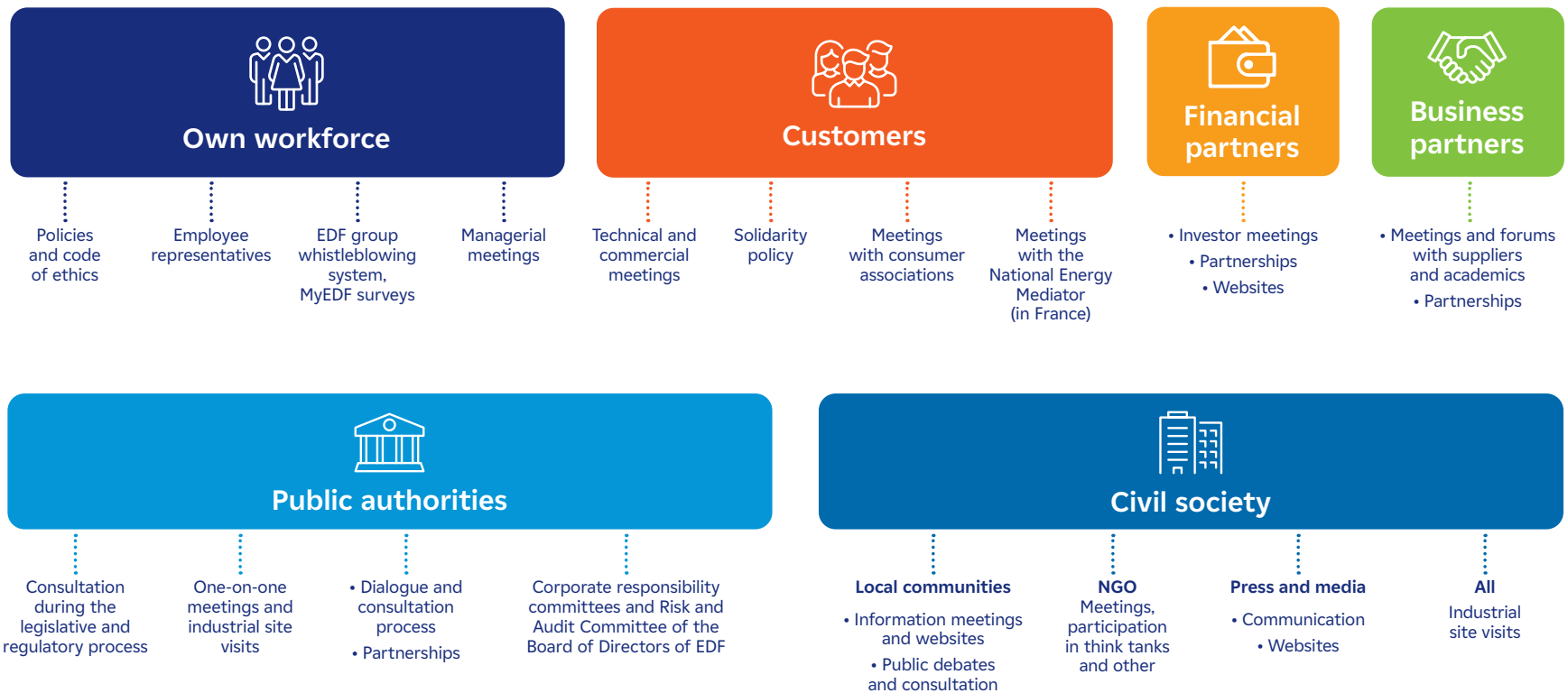
4.2 Concordance table with the Universal Registration Document

EDF's vigilance plan describes the various steps taken for each of the Group's CSR issues and commitments throughout chapter 2 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 mitigations and actions for 2025 in the various sections of the Sustainability Statement,** *including ESRS 2 General disclosures*
Human rights and fundamental freedoms	Cross-cutting	Risks of harassment and discrimination.	**S1** Own workforce **S**2 Workers in the value chain
	Activities and projects	• Risks related to land issues given the need for fair compensation and the implementation of sustainable livelihood restoration programmes. • Risk of inadequate consultation with local communities, particularly indigenous communities. • Risks related to the use of security forces.	**S3** Affected communities
	Activities and projects	Risk of infringement of workers' rights, notably risks related to decent working and housing conditions.	**S1** Own workforce **S**2 Workers in the value chain
	Activities and projects	Risk of forced labour by subcontractors.	**S**2 Workers in the value chain
Environment	Cross-cutting	Greenhouse gas emissions with effects on the climate: direct and indirect emissions.	**E1** Climate change
	Cross-cutting	Discharges with potential effects on air quality / with potential effects on air, water and soil.	**E2** Pollution
	Cross-cutting	Consumption with potential effects on: • raw material resources • waste generation • freshwater resources	**E2** Pollution **E3** Water resources **E4** Biodiversity and ecosystems **E**5 Resource use and circular economy
	Cross-cutting	Potential impacts on ecosystems: • ecosystem degradation • overexploitation of upstream natural resources	**E4** Biodiversity and ecosystems

Salient risks related to the duty of vigilance			Issues and commitments of the EDF group
Area	**Type of risk**	**Risk**	**Descriptions of mitigations and actions for 2025 in the various sections of the Sustainability Statement,** *including ESRS 2 General disclosures*
Personal safety and health	Employees and subcontractors	Risk of work-related accidents and work-related illnesses (asbestos, chemicals, ionising radiation and noise).	**S1** Own workforce **S**2 Workers in the value chain
	Employees and subcontractors	Risk of musculoskeletal disorders and anxiety-depressive disorders, including stress	**S1** Own workforce **S**2 Workers in the value chain
	Local residents	Risk of industrial accidents, in particular nuclear and hydropower accidents.	**S3** Affected communities **E2** Pollution **E3** Water resources
	Local residents	Risk of damage to health due to impacts on air quality.	**S3** Affected communities **E2** Pollution
Suppliers and subcontractors	Purchase category	Risks of harm to human rights, the environment or the safety and health of people, caused by commercial relationships established with suppliers in the most significant purchasing categories, rated by the entities in 2025.	**G**1 Business conduct **S**2 Workers in the value chain **S3** Affected communities **E1** Climate change **E2** Pollution **E3** Water resources **E4** Biodiversity and ecosystems **E**5 Resource use and circular economy

4.3 Infographic of the EDF group's stakeholders



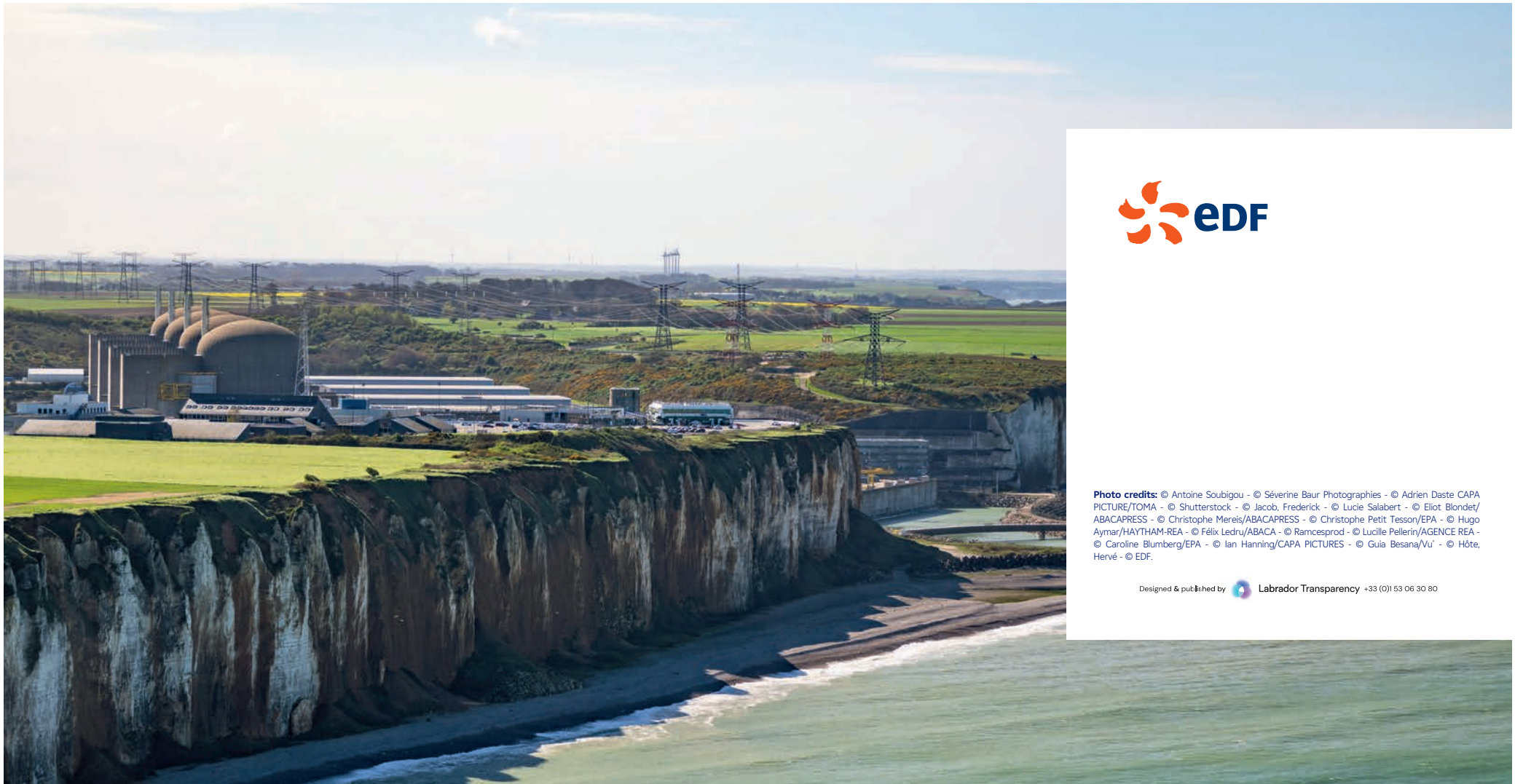


Photo credits: © Antoine Soubigou - © Séverine Baur Photographies - © Adrien Daste CAPA PICTURE/TOMA - © Shutterstock - © Jacob, Frederick - © Lucie Salabert - © Eliot Blondet/ABACAPRESS - © Christophe Mereis/ABACAPRESS - © Christophe Petit Tesson/EPA - © Hugo Aymar/HAYTHAM-REA - © Félix Ledru/ABACA - © Ramcesprod - © Lucille Pellerin/AGENCE REA - © Caroline Blumberg/EPA - © Ian Hanning/CAPA PICTURES - © Guia Besana/Vu' - © Hôte, Hervé - © EDF.

Designed & published by Labrador Transparency +33 (0)1 53 06 30 80