

ETHICS & COMPLIANCE POLICY

Tractebel - a leading global player in energy, water and infrastructure engineering – aims to build a trustworthy and reliable relationship with all its stakeholders adopting a culture of integrity and zero tolerance towards any illegal or unethical actions.

As part of the ENGIE Group, Tractebel adopts the ENGIE Ethics Code of Conduct as the foundation for its Ethics & Compliance Program. The ethical standards are based on the following five fundamental ethical principles which each and every one in Tractebel must promote and protect, whatever his/her position in the hierarchy, entity, or geographical sphere of intervention:

- 1 Proactively minimize environmental and social impacts of our activities and projects, striving to eliminate harm.
- **2** Factor the environment into project lifecycles so that our customers benefit from environmentally friendly, innovative solutions geared to their needs.
- 3 Make all of our employees and all stakeholders aware of the environmental challenges and the commitments applicable to our daily business.
- 4 Comply with ENGIE's policy on environmental responsibility and with labour and environmental legislation wherever have presence.

These principles are further detailed in the Referentials, in special the Tractebel Integrity Referential, the other Policies and Codes of Conduct of the Tractebel Ethics & Compliance Program.

In order to ensure the implementation of this Policy and the continuous improvement thereof, Tractebel deploys an anti-bribery management system as part of its Ethics & Compliance Program which meets the requirements set out in the ISO 37001:2016 standard.

This Ethics & Compliance Policy applies to all Tractebel subsidiaries, entities, and each person acting on behalf of any entity. It is also part of our global objective of achieving excellence in all our activities by continuously measuring and improving our performance.

Jessica DE BOECK BU Data Privacy Manager Anne HARVENGT
Chief Executive Officer

