



DIVERSITY, EQUITY & INCLUSION POLICY

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CONTENTS

I. PURPOSE 3

II. SCOPE 3

III. DIVERSITY, EQUITY & INCLUSION GUIDELINES 4

IV. LIVING UP TO OUR DEI GUIDELINES 5

V. ROLES AND RESPONSIBILITIES **65**

VI. TRANSPARENCY, MONITORING & REVIEW 6

ANNEX: DEFINITIONS 7

VERSION CONTROL

Version	Approved	Summary of Changes
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I. PURPOSE

ENGIE Impact is committed to a sustainability transformation that enables everyone to flourish. Critical to our ability to deliver on our purpose of Making Sustainability Happen Today is our dedication to fostering, cultivating, and preserving a culture of diversity, equity, and inclusion (DEI) here at ENGIE Impact and in the work we do every day. Our efforts in DEI and Culture are part of the same global effort to drive consistent behaviors across the business that are aligned with our purpose and values.

Our people are the heart of our business. The collective sum of the individual differences, life experiences, knowledge, inventiveness, innovation, self-expression, unique capabilities, and talent that our employees invest represents a significant part not only of our culture, but of our company's purpose as well.

POLICY OBJECTIVE

It is our objective to foster practices that support a diverse, equitable, and inclusive workplace where every employee can thrive. This policy aims to facilitate diversity of representation within work teams and to foster an inclusive work environment that respects and values individual differences, ensuring equal opportunities for all ENGIE Impact employees, and equity across ENGIE Impact teams and organizations.

WHY DIVERSITY, EQUITY & INCLUSION AT ENGIE IMPACT

There is no sustainability without diversity, equity, and inclusion; it is therefore central to our purpose, strategy, and culture. Our commitment and approach are based on the following core beliefs:

1. **DEI and our purpose are intertwined.** True sustainability transformation can only occur if we consciously and proactively create change that serves and benefits everyone, not just a chosen few.
2. **We must understand environmental justice and incorporate it where possible.** The effects of the climate crisis are demonstrably higher on populations that have historically been marginalized and/or underrepresented. To build a truly sustainable world and to drive real action toward tangible positive change, we must acknowledge and be knowledgeable about these impacts and take the opportunity to integrate them into our work wherever we are able.
3. **Diversity creates better business performance and impact.** Diversity of thought, background and experience in our employees has a multiplier effect on our business outcomes; it leads to increased innovation and better business results. Fresh perspectives, big ideas and collaborative thinking are particularly critical to our success given the urgency and complexity of the climate crisis.
4. **To live our values, we must nurture an inclusive culture.** We cannot be a purpose-driven, values-led organization without fully committing to DEI as central to our Culture strategy. To be authentically bold, open, demanding, and caring, we must continue to carefully build a culture where all employees have equal opportunities to flourish – to feel a sense of belonging, have their voices heard, and have an impact on our business.

II. SCOPE

This policy applies to all stakeholders involved in any activity with ENGIE Impact, including and not limited to employees, clients, contractors, suppliers, volunteers. All ENGIE Impact employees and stakeholders have a responsibility to treat others with dignity and respect at all times and are expected to exhibit conduct that reflects this Policy's guidelines during work, at work functions on or off the work site, and at all other company-sponsored and participative events.

Moreover, all activities must comply with ENGIE Group's commitments to Company Diversity and Social Responsibility, and in accordance with all rules, regulations, and labor laws in each country ENGIE Impact operates. This includes but is not limited to all equal employment opportunity law, as well as the collection and confidential handling of all personal and self-identification data.

III. DIVERSITY, EQUITY & INCLUSION GUIDELINES

At ENGIE Impact, we actively promote and defend the human rights of our employees. We have zero tolerance for discrimination and seek to eliminate inequalities in our business. It is our commitment to create a healthy and harmonious work environment that is free of physical, labor and/or psychological violence through the prevention, attention, and sanction for any type of harassment and any conduct contrary to the moral or ethical principles that govern us, thus strengthening the personal and professional quality of life of our people. Any form of discrimination, mistreatment, and violence towards or between employees regarding age, race, ethnicity, family or marital status, gender identity or expression, language, national origin and/or immigration status, physical and mental ability, political affiliation, religion, sexual orientation, socio-economic status, veteran status, and other characteristics is strictly prohibited.

DEI GUIDELINES FOR ALL ENGIE IMPACT EMPLOYEES

We view DEI as connected to our purpose and critical to ensure the well-being of all employees and the stakeholders we serve. It is therefore ENGIE Impact's expectation that all employees, regardless of position, do the following:

- Foster a work environment of respect and equality. Strictly prohibit discrimination in any of its expressions, such as bigotry, racism, ableism, homophobia, transphobia, misogyny, xenophobia, racial or religious segregation, and any other form of intolerance or violence. Call out and/or report any acts of discrimination against yourself or others (see 'Living Up to our DEI Commitments' section).
- Model and celebrate behaviors that nurture an inclusive culture. In accordance with ENGIE Impact values, co-create with your colleagues a welcoming, supportive, safe, affirming, and respectful work environment. Offer support and encouragement by honoring your colleagues' individuality as well as your own by affirming and validating personal values, beliefs, principles and lived experiences.
- Identify and address your own or others' microaggressions, whether intentional or unintentional, and actively work to reduce their occurrence in our workplace and in your own actions. Use these as opportunities to educate, learn, and improve.
- Participate in continuous learning, development and training offered in the areas of diversity, equity, and inclusion. Encourage, engage, and support respectful dialogue and courageous conversations, even when uncomfortable.
- Read and comply with this Policy. If you are unsure whether you are following this Policy, ask your supervisor for advice or support so you can uphold the values described here.

DEI GUIDELINES FOR ENGIE IMPACT LEADERS

In addition to the above commitments and recognizing the position of influence and responsibility that supervisors and leaders hold, ENGIE Impact further directs all supervisors and leaders, with coordination and support from Human Resources, to also do the following:

TALENT MANAGEMENT

- Promote diversity in all hiring activities including recruiting, interviewing and selection; recruit and appoint culturally, racially, ethnically, and gender diverse managers and leaders (see Talent Acquisition Policy for more detail).

- Actively engage in initiating, promoting, and championing inclusive strategies to retain workforce diversity in race, ethnicity, color, sex, national origin, religion, sexual orientation, gender identity and expression, age, veteran status, and disability status.
- Ensure equal access to growth and leadership development, educational and training opportunities, succession planning, mentoring opportunities, and other resources. Improve our cultural leadership pipeline by creating and supporting programs and policies that foster leadership that reflects the diversity of our global reach.

PAY EQUITY

- Provide equitable compensation and benefits for any employee performing functions of similar responsibility.

INCLUSIVE WORKPLACE & LEADERSHIP BEHAVIORS

- Support progressive facilities and environment planning to ensure all ENGIE Impact workplaces are a welcoming, inclusive, and accessible environment for all employees and clients.
- Model and celebrate behaviors that drive an inclusive culture. Work to build a culture of inclusiveness, consciously modeling ENGIE Impact's values and the behaviors described in this Policy. Regularly and consistently communicate on DEI-related topics, taking local priorities and cultures into consideration.
- Respect and promote the rights of all employees to achieve balance in their lives, promoting joint responsibility in work, family and personal life for our colleagues and stakeholders.
- Lead with respect, empathy, and celebration of our diverse backgrounds, and commit to ensuring that all voices are heard and valued. Create safe spaces to actively listen to the experiences of staff, especially those from marginalized groups, and take swift action to change discriminatory or exclusionary actions or practices.
- Actively support and be involved in current DEI efforts (both at the leadership and individual contributor levels, including the initiatives led by our Employee Resource Groups).

TRANSPARENCY & ACCOUNTABILITY

- Utilize quantitative and qualitative metrics to track incremental, measurable progress toward the visibility of our DEI efforts. Utilize all available DEI-related data to inform and direct strategic and daily decision-making.
- Ensure transparency and accountability by sharing lessons learned with internal and external audiences.
- Acknowledge and dismantle any inequities within our policies, systems, programs, and services. Wherever possible, integrate considerations of environmental justice into our work with clients, to acknowledge and increase attention to this challenge.

IV. LIVING UP TO OUR DEI COMMITMENTS

Every ENGIE Impact employee is asked to commit to demonstrating the behaviors described in this Policy. Commitment to DEI is included in annual evaluation criteria for leaders, who are required to demonstrate how they have worked to achieve and/or exceed ENGIE Impact's DEI goals, to model the behaviors described in this Policy, and to actively support team members in their personal DEI journeys.

Any employee found to have exhibited inappropriate conduct counter to this Policy may be subject to disciplinary action, up to and including termination.

Employees who believe they or their colleagues have been subjected to any kind of discrimination that conflicts with ENGIE Impact's DEI Policy and initiatives by another ENGIE Impact employee or stakeholder should seek assistance from their supervisor or their HR Business Partner.

In addition, ENGIE and ENGIE North America have established confidential and anonymous whistleblower systems for the receipt, retention and treatment of concerns and complaints. Please see the [ENGIE Whistleblower Policy](#) and the [ENGIE Ethics & Compliance Whistleblower Process](#) for more detailed information. In accordance with

ENGIE's Whistleblower Policy, any person reporting discrimination will not be retaliated against in any way, including criminal or disciplinary measures.

V. ROLES AND RESPONSIBILITIES

Accountable for the effectiveness of this Policy, the mandate for DEI is conducted by the Chief Human Resources Officer with the full support of the Chief Executive Officer and Executive Committee. All Executive Committee members are expected to play an active role in demonstrating ENGIE Impact's commitment to DEI in all aspects of their business operations, and in setting expectations across their organizations for behaviors consistent with the guidelines in this Policy.

The Chief Human Resources Officer is supported by FTE roles in Human Resources with the specific directive to develop, implement, and manage DEI initiatives across the business and to ensure close alignment with all related efforts at ENGIE Group. (See ENGIE Impact's Annual DEI Plan for more detail.) These roles utilize a network of representatives from across all ENGIE Impact business and functional organizations, management levels and geographic regions, who assist in furthering DEI across ENGIE Impact, provide feedback on corporate DEI efforts, and function as liaisons to their respective organizations to increase involvement in DEI initiatives across the business.

Moreover, ENGIE Impact's Employee Resource Groups (ERGs) are our corporate-recognized workplace groups, voluntarily led by employees, which allow employees with commonalities to connect and engage with each other and produce a particular outcome that helps to improve ENGIE Impact's business and culture. (See the Employee Resource Group Charter for more detail.) ERG leaders have an Executive Sponsor and regular meetings with the Chief Executive Officer and Chief Human Resources Officer for ongoing support of their annual plans and activities. ERG leaders are also in close contact with Human Resources roles directly supporting DEI to ensure continued alignment across all DEI-related efforts and proper visibility in all parts of the business.

VI. TRANSPARENCY, MONITORING & REVIEW

ENGIE Impact is committed to transparency in our DEI efforts. We regularly communicate to employees and stakeholders on this policy and progress against our Annual DEI Plan in addition to employee experience survey results on inclusive culture, pay equity analysis across demographic groups, and progress towards representation targets. Moreover, we systematically monitor all available DEI data and metrics, and consistently utilize it to influence strategic decision making.

This Policy will be regularly reviewed and updated. Likewise, we will regularly update the Annual DEI Plan as we learn and evolve as an organization, so that ENGIE Impact continues to progress toward our vision of a diverse, equitable and inclusive culture where every employee can thrive.

ANNEX: DEFINITIONS

Bigotry: Obstinate or unreasonable attachment to a belief, opinion, or faction; in particular, prejudice against a person or people on the basis of their membership of a particular group.

Discrimination: The unjust or prejudicial treatment of different categories of people or things, especially on the grounds of age, race, ethnicity, family or marital status, gender identity or expression, language, national origin and/or immigration status, physical and mental ability, political affiliation, religion, sexual orientation, socio-economic status, veteran status, and other characteristics.

Diversity: Commitment to the representation of populations that have historically been marginalized and/or underrepresented. These include, but are not limited to, diverse populations of race, gender, religion, sexual orientation, ethnicity, nationality, socio-economic status, language, physical and mental ability, age, and political perspective. At a bare minimum, diversity implies that company representation matches its geographic locations.

Environmental Justice: Fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. Bases environmental work under the premise that marginalized groups are inequitably impacted by environmental issues.

Equality: The state of being equal, especially in status, rights, and opportunities.

Equity: The promotion of justice, impartiality, and fairness within operations, processes, and distribution of resources. Tackling equity issues requires an understanding of the root causes of outcome disparities within our society – and the willingness to actively account for these systemic issues within the organization.

Harassment: Any unwanted behavior, physical or verbal (or even suggested), that makes a reasonable person feel uncomfortable, humiliated, or mentally distressed.

Homophobia: Prejudice, discrimination, or antagonism directed against a person or people who are lesbian, gay, bisexual, transgender, or queer (LGBTQ).

Inclusion: Ensuring that those in diverse populations truly feel a sense of belonging, with equal opportunity for their voices to be heard and to have an impact on the business. Inclusion implies representation and equal opportunity across all operations, including development, career opportunities and decision-making.

Inequality: The quality of being unequal, imbalanced or uneven, such as social disparity, or disparity of distribution of resources or opportunity.

Inequity: An instance of injustice or unfairness due to avoidable differences arising from unfair treatment, poor management, corruption, or cultural exclusion.

Intolerance: The unwillingness to accept views, beliefs, or behavior that differ from one's own.

Microaggression: A statement, action, or incident regarded as an instance of indirect, subtle, or unintentional discrimination against members of a marginalized group.

Misogyny: Prejudice, discrimination, or antagonism directed against women.

Racism: Prejudice, discrimination, or antagonism directed against a person or people on the basis of their membership in a particular racial or ethnic group, typically one that is a minority or marginalized.

Transphobia: Prejudice, discrimination, or antagonism directed against a transsexual or transgender person or people.

Xenophobia: Prejudice, discrimination, or antagonism directed against a person or people from other countries.