



## Whistleblower Policy

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## Introduction – Scope

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## Whistleblower Policy

The Group sets up the Group Whistleblowing System, which may be accessed by email and telephone from all of its entities<sup>1</sup>.

This System is open to all Group Employees, their representants, its Stakeholders, including the suppliers, subcontractors and their respective employees, trade unions, NGOs,...etc.

To guarantee Confidentiality of the Whistleblower's identity, and ensure that Reports are processed objectively, the Whistleblowing system is managed by a Provider.

The Policy and the Group Whistleblowing System do not eliminate the Local Whistleblowing Hotlines or the Group Dedicated Notice Hotlines. The different systems can coexist, subject to any mandatory legislation that may apply in the relevant countries.

If a report is filed both through the Group Whistleblowing System and a Local Whistleblowing Hotline or a Group Dedicated Notice Hotline, for purposes of compliance with both local national legal requirements and the legal requirements binding on the Group, the decision to attribute a Report will be made on a case by case basis between the Group's Ethics, Compliance, and Privacy Director and the persons in charge of the Local Whistleblowing Hotlines or the Group Dedicated Notice Hotlines.

The staff in charge of the Local Whistleblowing Hotlines or Group Dedicated Notice Hotlines will make sure this rule is duly followed by working in coordination with the Group's Ethics, Compliance, and Privacy Director.

Using the Group Whistleblowing System is optional for employees.<sup>2</sup> It enables them and the Stakeholders to refer to the Group confidentially<sup>3</sup>.

Whistleblowing Reports pertain to the following issues: corruption, human rights violations, fraud, breach of personal data privacy rules, violations of international sanctions and embargoes, health and

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1. ENGIE SA, its subsidiaries, and all affiliated companies controlled by ENGIE.

<sup>2</sup> Not using this system will not have any disciplinary consequences for Group employees.

<sup>3</sup> The Group guarantees that the Whistleblower's identity will remain Confidential as per the conditions described in this Policy.



## Whistleblower Policy

safety and environmental damage, and more broadly, violations of applicable law or regulations, in particular as regards conduct subject to criminal punishment. Reports may also relate to violations of the Group's ethics rules or Code of Conduct, which comprises ENGIE's Ethics Charter and Practical Guide to Ethics.

To be eligible for protection under the Policy, Whistleblowers must act in good faith for the public good, in good faith and without malice and concerning serious misconduct they have personal knowledge of that concerns the Group directly or indirectly<sup>4</sup>. . Otherwise, the Group reserves the right to take any appropriate action.

## How to File a Report

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There are two ways to file a Report using the Group Whistleblowing System:

- via email to the Group address: [ethics@engie.com](mailto:ethics@engie.com); or
- by calling the secure toll-free hotline, which operates over extended hours:
  - +33 800 23 48 23 48 (Geographical area 1<sup>5</sup>)

In case of non-availability of the free telephone line, a unique number to France:

- +33 1 45 51 03 67

Reports may be made in French, English, Spanish, or Portuguese.

The Group Ethics, Compliance, and Privacy Director, acting as Reference Officer for the whole Group, has appointed a Provider from outside the Group in charge of implementing and monitoring the Group Whistleblowing System.

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<sup>4</sup> Including but not limited to its suppliers, subcontractors, providers, and partners.

<sup>5</sup> Countries in Geographical Area 1: List of countries in Geographical Area 1: Argentina, Australia, Austria, Belgium, Brazil, Canada, China, France, Germany, Greece, Hungary, Italy, Luxembourg, Malaysia, Monaco, Netherlands, Norway, Pakistan, Philippines, Poland, Portugal, Czech Republic, Romania, United Kingdom, Singapore, Slovakia, South Africa, Spain Switzerland, Thailand, United States. Be careful, some countries can be subject to a specific code for example Australia, Brazil, Canada, Singapore, Thailand, or United States thank you to inquire.



## Whistleblower Policy

The Provider in charge of the Group Whistleblowing System's two reporting channels is a recognized expert in whistleblowing systems and satisfies this Policy's requirements (Confidentiality, turnaround times, personal data privacy, and compliance with the legal provisions applicable to this Policy).

Further details about these two whistleblowing channels are available to Group Employees and Stakeholders via the intranet and internet sites of the Group.

## Reporting Procedure

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As soon it receives a notice that may qualify as a Report, the Provider assigns it a case number and sends the author an acknowledgement of receipt immediately.

The Whistleblower has the option of identifying him/herself or remaining anonymous. If a Whistleblower chooses to identify him/herself, s/he may also give the Provider a way to reach them and keep them informed of any action taken as a result of the Report. If the Whistleblower wishes to remain anonymous, the Provider will inform the Whistleblower that s/he must contact the Provider again if s/he wishes to know what action has been taken further to his/her Report.

The Provider never gives the Whistleblower's name to its contacts at the Group, and in particular the Group's Ethics, Compliance, and Privacy Director.

However, if the Group's Ethics, Compliance, and Privacy Director needs to know the Whistleblower's identity for the purposes of the investigation, the Provider shall not disclose it to him/her without the Whistleblower's prior express and unambiguous consent.

If necessary, the Provider will arrange for one or more additional exchanges with the Whistleblower. The Whistleblower can give the Provider any documents s/he deems relevant, provided they were not obtained illegally.



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If the Group's Ethics, Compliance, and Privacy Director's preliminary review of the notice indicates that the allegations are unsubstantiated and/or unrelated to the matters authorized under the Policy, the case will be closed and the Provider will inform the author of the notice as soon as possible.

If, however, the Group's Ethics, Compliance, and Privacy Director believes he/she is in possession of adequate credible information based on the information provided by the Provider, the Group's Ethics, Compliance, and Privacy Director then starts an Investigation in accordance with Group procedures (including the INFORM'Ethics procedure), which determine what action will be taken further to the Report.

As soon as possible, and after coordinating with the Group Ethics, Compliance, and Privacy Director, the Provider will inform the Whistleblower of the outcome of the completed Investigation.

### ENGIE

1 place Samuel de Champlain - Faubourg de l'Arche  
92930 Paris La Défense cedex  
Tel. +33 (0)1 44 22 00 00  
[engie.com](http://engie.com)

ENGIE - A joint-stock company with capital of EUR 2,435,285,011 - Nanterre Commercial Register 542 107 651



## Whistleblower Policy

# Whistleblower Protection

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Any Whistleblower acting in good faith, without malice, for the public good, based on facts he/she has personal knowledge of, and in accordance with the procedure set out in the Policy receives the protection granted by law<sup>6</sup> and offered by the Group:

- The Whistleblower's identity is kept strictly confidential<sup>7</sup>. The Provider sends the Group only the information necessary to process the Report.
- The Group will not retaliate in any way (criminal or disciplinary measures) against a Whistleblower for having made a Report.

Any Whistleblower who believes s/he is being retaliated against should inform the Group immediately, in particular through the Group Whistleblowing System. If the accusations of retaliation prove true, the Group will take all necessary measures to put an end to such retaliation.

However, the Group reserves the right to take all appropriate action with regard to malicious or abusive Reports.

# Personal Data Processing

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The Group Whistleblower System has been notified to the French Data Protection Authority (CNIL),<sup>8</sup> with a commitment to comply with the single AU-004 authorization,

The personal data collected upon receiving and processing a Report are limited to:

- Name, position, and contact details of the Whistleblower;
- Name, position, and contact details of the person who is the subject of the Report;

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<sup>6</sup> In particular, by the provisions of French law 2016-1691 of December 9, 2016 on transparency, combating corruption, and modernizing economic life.

<sup>7</sup> Unless the Whistleblower previously, expressly and unambiguously agreed to cease to keep his/her identity confidential.

<sup>8</sup> As of May 25, 2018, decision 2017-191 of June 22, 2017, amending decision 2005-305 of December 8, 2005 providing for single authorization of automated personal data processing performed as part of a whistleblowing system (AU-004), no longer has legal value. The CNIL indicates, however, that AU-004 continues to be a tool to guide actions taken to comply with the new obligations arising from Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 (GDPR).



## Whistleblower Policy

- Name, position, and contact details of the persons involved in receiving, processing, and Investigating the Report;
- The facts stated in the Report;
- Data collected during the Provider's preliminary review and the Investigation;
- The Investigation/inquiry report, if any;
- Report follow-up.

Anyone whose personal data is processed in connection with a Report will be informed, unless Investigation-related imperatives make it necessary to postpone informing them in the circumstances.

Such individuals may exercise their access and correction rights by contacting the Provider and the Group (email addresses circulated to Employees and Stakeholders via the communication tools).

Transfers of personal data are supervised in accordance with applicable EU regulations.

If the Investigation of a Report does not corroborate the alleged facts, all documents related to the Report (including personal data) and its processing that make it possible to identify the Whistleblower and the subject(s) of the Report will be archived or destroyed in accordance with applicable law.

If the Investigation corroborates the reported conduct and the Group initiates a proceeding against the subject(s) of the Report, or when the Group Whistleblowing System has been used maliciously or abusively and the Group initiates a proceeding against the person who filed the Report, all Report-related data, including personal data, will be retained until the end of the proceeding. When the proceeding ends, all data referred to above will be archived or destroyed in accordance with applicable law.

This Policy is circulated within the Group via:

- the line's SharePoint for members of the Group's Ethics & Compliance network;
- the Ethics & Compliance pages of the Group's intranet for all Group employees;
- the Group's virtual library;
- mandatory posting<sup>9</sup> in each Group entity (explanation of how to file a Report).

The Group's Stakeholders will be informed of this Policy and the Group Whistleblower System primarily through the Ethics, Compliance & Privacy portal of the Group's website.

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<sup>9</sup> Attached to the internal rules, for the French entities.



## Whistleblower Policy

# Monitoring of the Policy

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Implementation of this Policy will be monitored in accordance with the control systems detailed in the Group's Ethics Compliance Referential.

## Glossary

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**Report(s):** A report, made in good faith for the public good, of any violation of applicable law or regulations in the following areas: corruption, human rights, fraud, personal data privacy, international sanctions and embargoes, health and safety, environmental damage; any other violation of applicable law or regulations, in particular as regards conduct subject to criminal punishment; or any violation of the Group's ethics rules or Code of Conduct, which comprises ENGIE's Ethics Charter and Practical Guide to Ethics.

**Employee(s):** Anyone who works for ENGIE SA or a Group entity (corporate officers, permanent or temporary employees, interim staff and interns).

**Confidentiality:** Means the Provider's obligation not to disclose the Whistleblower's name to the Group Ethics, Compliance, and Privacy Director or any other person.

**Group:** Means ENGIE, a limited liability company that has its registered office at 1 place Samuel de Champlain, F-92400 Courbevoie, is registered with the Nanterre Trade and Companies' Register under number 542 107 651, and has share capital of EUR 2,435,285,011, as well as the subsidiaries in which it directly or indirectly holds a majority of the share capital or voting rights on the statutory governance bodies, in particular the board of directors, management board, supervisory board, or the power to appoint chief executive officers and/or general managers.

**Investigation:** The Report-related investigation conducted by the Group Ethics, Compliance, and Privacy Director.





## Whistleblower Policy

**Whistleblower(s):** An individual who files a Report on their own behalf or on behalf of a Stakeholder that is a legal entity.

**Local Whistleblowing Hotline(s):** Means the whistleblowing hotline(s) that is/are made available by the Group entities throughout the world and the procedure/policy describing the operation thereof.

**Group's Dedicated Notice Hotline(s):** Means the notice hotline(s) made available by the Group under dedicated legislation governing certain matters, such as the Group DPO's email address, and the procedure/policy describing operation thereof.

**Stakeholder(s):** An individual or legal entity that is not an Employee and is directly or indirectly concerned by a decision or project of the Group or a Group entity (supplier, subcontractor, intermediary, union, NGO, etc.).

**Policy:** This policy.

**Provider:** The entity that is not part of the Group, responsible for setting up and monitoring the Group Whistleblowing System.

**Reference Officer:** An individual designated for the whole Group with whom Reports are filed and who is in charge of their processing.

**Group Whistleblowing System:** Means the system set up by the Provider, in cooperation with the Group Ethics, Compliance, and Privacy Director, that enables Whistleblowers to file their Reports to the Group.



# **Australian Addendum to Group Whistleblower Policy**

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## Purpose

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This Australian Addendum summarises the mandatory legislative requirements applying in Australia relating to whistleblowing.

This Australian Addendum must be read together with the Group Whistleblower Policy. If the Australian Addendum imposes a higher standard of compliance than the Group's Whistleblower Policy, the Australian Addendum will apply.

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## Commencement

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This Australian Addendum is effective in Australia from 1 January 2020.

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## Application

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This Australian Addendum applies to all disclosures made by current and past employees, volunteers, officers, contractors, suppliers (including employees and volunteers of suppliers) and associates of the Group's Australian subsidiaries and Australian operations (together, **ENGIE Australia**), as well as these people's relatives and these people's dependents (or their spouse's dependents).

To receive protection under the Australian whistleblowing legislation, disclosures must meet certain criteria.

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## Protected Disclosure under the Act

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A "protected disclosure" must relate to a "disclosable matter" and be made to "eligible" recipients. In Australia, a disclosure must be made on reasonable grounds (with the exception of disclosures made to the Commissioner of Taxation – see the table further below) and may be eligible for protection under the *Corporations Act 2001* (Cth) (the **Act**) or the *Taxation Administration Act 1953* (Cth) even if the Whistleblower does not have personal knowledge of the disclosable matter and the disclosure is not made in good faith and for the public good.

### Who the disclosure can be made to

A Whistleblower can make a disclosure in Australia 24/7 via a secure online portal powered by Whispli, an independent external provider to ENGIE Australia, that gives Whistleblowers the opportunity to make disclosures confidentially and also anonymously, if they wish. The disclosures made via Whispli, are received by CurbyMcLintock, an independent external provider to ENGIE Australia. Whispli can be contacted at <https://engie.whispli.com/whistleblowing> or via the QR Code below:



A Whistleblower may also make disclosures under the Group’s Whistleblower Policy. The localised toll free number that can be used to report under the Group’s Whistleblower Policy is 1800 325 048 (which can be used in addition to the hotlines and emails included in the Group Whistleblower Policy).

However, if you are based in Australia, your report will be most effectively managed if made through Whispli, and we encourage you to use the online portal.

Disclosures made to Whispli will remain confidential and will be reported to ENGIE Australia in accordance with the Group’s procedures for managing Whistleblower reports.

The Australian whistleblowing legislation also allows for disclosures to be made to other eligible recipients. The type of information that can be disclosed and the recipients are outlined in the following table:

Disclosable matter	Recipient of disclosed information
<p><b>General disclosable matters</b></p> <p>Information about actual or suspected misconduct, or an improper state of affairs or circumstances in relation to ENGIE Australia or any of its related bodies corporate.</p> <p>Information that ENGIE Australia or a related body corporate or any officer or employee of ENGIE Australia or a related body corporate has engaged in conduct that:</p> <ul style="list-style-type: none"> <li>• contravenes or constitutes an offence against certain legislation (e.g., the Act);</li> <li>• represents a danger to the public or the financial system; or</li> </ul>	<p><b>Recipients for general disclosable matters</b></p> <ul style="list-style-type: none"> <li>• A person authorised by ENGIE Australia to receive protected disclosures under this Australian Addendum or under the Group Whistleblower Policy (see above and section 2 of the Group Whistleblower Policy).</li> <li>• An officer or senior manager of ENGIE Australia or a related body corporate.</li> <li>• An auditor, or a member of an audit team conducting an audit, of ENGIE Australia or a related body corporate.</li> <li>• An actuary of ENGIE Australia or a related body corporate.</li> </ul>

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- constitutes an offence against any law of the Commonwealth of Australia that is punishable by imprisonment for a period of 12 months or more.
  - The Australian Securities and Investments Commission (**ASIC**) or the Australian Prudential Regulation Authority (**APRA**).
  - A legal practitioner for the purposes of obtaining legal advice or legal representation.

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**Tax-related disclosable matters**

Information about actual or suspected misconduct, or an improper state of affairs or circumstances, in relation to the tax affairs of ENGIE Australia or an associate, which the discloser considers may assist the recipient to perform functions or duties in relation to the tax affairs of ENGIE Australia or an associate.

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**Recipients for any tax-related disclosable matters**

- A person authorised by ENGIE Australia to receive reports of tax-related disclosable matters under this Australian Addendum or under the Group Whistleblower Policy (see above and section 2 of the Group Whistleblower Policy).
- An auditor, or a member of an audit team conducting an audit, of ENGIE Australia.
- A registered tax agent or BAS agent who provides tax services or BAS services to ENGIE Australia.
- A director, secretary or senior manager of ENGIE Australia.
- An employee or officer of ENGIE Australia who has functions or duties that relate to the tax affairs of ENGIE Australia.
- A legal practitioner for the purpose of obtaining legal advice or legal representation.

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**Further tax-related information**

Information that the discloser considers may assist the Commissioner of

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**Recipients for any further tax-related information**

- Commissioner of Taxation.

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Taxation to perform his or her functions or duties under a taxation law in relation to ENGIE Australia or an associate.

Such a disclosure does not need to be made on reasonable grounds in order to qualify for protection.

- A legal practitioner for the purpose of obtaining legal advice or legal representation.

The law also protects certain disclosures made in emergency and public interest situations, in which case disclosures can be made to additional eligible recipients, such as journalists and Members of Parliament by strictly following specified requirements. Whistleblowers are encouraged to contact Lawrence Kim, ENGIE Australia's General Counsel and Executive General Manager, External Relations, ENGIE Australia & New Zealand, if they would like more information about emergency and public interest disclosures.

Some examples of potential protected disclosures under this Australian Addendum include the following:

- breach of laws or regulations;
- breach of ENGIE Australia policies, standards or codes (including this Australian Addendum);
- criminal activity;
- bribery or corruption;
- conduct endangering health and safety or causing damage to the environment;
- dishonest or unethical behaviour;
- conflicts of interest;
- anti-competitive behaviour;
- financial fraud or mismanagement;
- insider trading;
- breach of trade sanctions or other trade controls;
- unauthorised use of ENGIE Australia's confidential information;
- conduct likely to damage the financial position or reputation of ENGIE Australia;
- human rights abuses or modern slavery practices in ENGIE Australia operations or supply chains;
- engaging in or threatening to engage in detrimental conduct against a person who has made a disclosure or is believed or suspected to have made, or be planning to make, a disclosure under this Australian Addendum; and
- deliberate concealment of any of the above.

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## **Personal work-related grievances**

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Disclosures solely about personal employment related matters (**personal work-related grievances**) are only protected under the Australian whistleblowing legislation in limited circumstances.

Personal work-related grievances are grievances relating to the Whistleblower's employment that have implications for them personally (such as a disagreement between the Whistleblower and another employee or a decision about a promotion).

A disclosure of a personal work-related grievance will be protected if, in summary:

- it concerns detriment to the Whistleblower because they have or may be considering making a disclosure; or
- it is made to a legal practitioner for the purposes of obtaining legal advice or legal representation in relation to the operation of the Australian whistleblowing legislation.

Under the law, a grievance is not a personal work-related grievance if it:

- has significant implications for an entity regulated under the law that do not relate to the Whistleblower;
- concerns conduct, or alleged conduct, in contravention of specified corporate and financial services laws, or constitutes an offence punishable by 12 months or more imprisonment under any Commonwealth laws; or
- concerns conduct that represents a danger to the public or financial system.

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## **Disclosure of a Whistleblower's identity**

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If a Whistleblower makes a protected disclosure, the law provides that their identity (and any information they provided that someone could likely use to work out their identity) can only be disclosed if:

- the Whistleblower gives their consent to ENGIE Australia to disclose that information. The person receiving the disclosure will seek the Whistleblower's consent before recording their name;
- the disclosure is allowed or required by law (e.g., the disclosure by ENGIE Australia to a lawyer in order to get legal advice); or
- in the case of information likely to identify the Whistleblower, it is reasonably necessary to disclose the information for the purposes of an investigation, but all reasonable steps have been taken to prevent someone from working out their identity.





There is no requirement for a Whistleblower to reveal their identity under this Australian Addendum in order for their disclosure to qualify as a protected disclosure, but their anonymity may impact the assessment or investigation of their disclosure – see below under **Response by ENGIE Australia to a disclosure**.

Non-compliance with these confidentiality requirements is an offence.

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### **Response by ENGIE Australia to a disclosure**

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Disclosures made by a Whistleblower under this Australian Addendum will be assessed in line with the process outlined in the Group Whistleblower Policy and treated sensitively and seriously and will be dealt with promptly and objectively.

Any investigations commenced will be conducted in a timely manner (as appropriate in the circumstances) and will be independent from any persons to whom the disclosure relates.

Anonymous disclosures will be assessed in the same way as if the Whistleblower had revealed their identity, and any investigation will be conducted as best as possible in the circumstances. However, an investigation may not be possible or may be limited unless sufficient information is provided.

All employees and contractors must cooperate fully with any investigations.

Unless there are confidentiality or other reasons not to do so, persons to whom the disclosure relates will be informed of the allegation at an appropriate time and will be given a chance to respond to the allegations made against them. If they are current or former employees, they may access ENGIE Australia's Employee Assistance Program and may also request additional support from ENGIE Australia (such as counselling or other support services).

If a disclosure is formally investigated, the results of any investigation will be recorded in writing in a formal internal report that will be confidential and remains the property of the Group. The outcome of any material investigation will be reported to relevant Boards of Directors, or committees thereof.

If appropriate, disclosers and the persons to whom the disclosure relates may be informed of the investigation outcome. However, it may not always be appropriate to provide this information.

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### **Specific protections and remedies**

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If a Whistleblower makes a protected disclosure, the law provides that they will be protected from the following:



- a Whistleblower is not subject to any civil, criminal or administrative liability (including disciplinary action) for making the disclosure;
- no contractual or other remedy may be enforced or exercised against a Whistleblower on the basis of the disclosure; and
- in certain circumstances (e.g., if the disclosure has been made to a regulator) the information the Whistleblower provides is not admissible in evidence against the Whistleblower in criminal proceedings or in proceedings for the imposition of a penalty, other than proceedings in respect of the falsity of the information.

Additional legislative protections and remedies may also be available, including but not limited to:

- compensation for loss, damage or injury suffered as a result of detrimental conduct;
- an injunction to prevent, stop or remedy the effects of the detrimental conduct;
- if the detrimental conduct wholly or partly resulted in the termination of an employee's employment, reinstatement of their position; and
- any other order the court thinks appropriate.

No person may victimise or cause detriment to someone (or threaten to do so) because of a suspicion that any person has, will or could make a disclosure. For example, victimisation or detriment could include doing or threatening to do something that creates:

- discrimination, detriment or damage to a person's reputation, property, business or financial position;
- harassment, intimidation or retaliation; or
- a demotion or dismissal.

Non-compliance with these no victimisation or detriment requirements is an offence.

ENGIE Australia is also committed to making sure that Whistleblowers are treated fairly and do not suffer detriment because they have made a protected disclosure. The protections offered will be determined by ENGIE Australia and depend on things such as the matter reported and people involved. Protections may include the following:

- monitoring and managing the behaviour of other employees;
- relocating individuals (which may include the people alleged to have been involved in the "misconduct") to a different division, group or office;
- offering Whistleblowers a leave of absence or flexible workplace arrangements while a matter is investigated;
- a Whistleblower who is a current or former employee may access ENGIE Australia's Employee Assistance Program and may also request additional



support from ENGIE Australia (such as counselling or other support services);  
and/or

- rectifying any detriment that a Whistleblower has suffered.

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### **Availability of the Group Whistleblower Policy and Australian Addendum and training**

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The Group Whistleblower Policy is available via the avenues identified in the Group Whistleblower Policy. The Group Whistleblower Policy, together with the Australian Addendum, is also available on ENGIE Australia's website and ENGIE Australia's intranet. All new employees also have access to the Group Whistleblower Policy and the Australian Addendum via an ENGIE Australia app for new starters.

ENGIE Australia is committed to ensuring potential Whistleblowers are aware of and understand the Group Whistleblower Policy and Australian Addendum. Training is provided to employees and other individuals who receive whistleblowing disclosures or otherwise have a role under the Australian Addendum, including in relation to how to respond to disclosures.

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### **Amending the Group Whistleblower Policy and Australian Addendum**

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The terms of the Group Whistleblower Policy and this Australian Addendum do not form part of a team member's employment contract. ENGIE reserves the right to amend the Group Whistleblower Policy and the Australian Addendum at its discretion from time to time.