



CODE OF CONDUCT

ETHICS AND COMPLIANCE

EDF S.A

Applicable from June 12th, 2023



Message from Luc Rémont EDF Chairman and CEO

This Code must contribute to the development of our culture of integrity, a guarantor of the trust of our stakeholders.

In an ever more uncertain world, the EDF Group is subject to an increasing set of national and international rules aimed at preventing breaches of probity. Being unfamiliar with them is likely to incur our individual and collective liability, and undermine our reputation among our stakeholders.

This Code of Conduct must be used as a compass to help us identify high-risk situations and the individual and collective responses to be provided. It recaps the behaviour expected of all Group employees, regardless of their position. In the event of non-compliance with this Code of Conduct, every individual has the ability to alert their line managers, their ethics and compliance officer, or to contact the Group Ethics and Compliance Division. We encourage our employees to come forward, when they wish to share a concern about meeting our commitments. This is designed to protect our Group and its employees.

The EDF Group has built its culture of integrity on the public service values that permeate the company. Promoting integrity means placing trust at the centre of our relations with our stakeholders, while supporting our customers in a responsible way, developing our ethical skills, working towards the long-term accomplishment of our missions and our *raison d'être*.



Editorial

Valérie Audoubert

EDF Group Ethics and Compliance
Director

Let us be exemplary, with full knowledge of the facts

The company Code of Conduct is an obligation linked to the application of the Sapin 2 Law, which we use positively in the EDF Group, in order to safeguard our excellent reputation.

It is part of EDF's ethics and compliance system, in addition to our Ethics Charter, in full application of our Group Ethics and Compliance Policy. It supports the requirements when it comes to corruption and influence peddling, fraud, and other breaches of probity.

This Code sets out the main principles of behaviour, both collectively and individually, which are expected in the day-to-day exercise of our activities between in-house employees, and when interfacing with our stakeholders.

It helps to identify high-risk situations and suggests solutions, with practical illustrations.

It was approved by the Central Social and Economic Committee of EDF on 21 April 2023. It is incorporated into the rules and regulations of all EDF SA establishments, in accordance with the procedure set out in the French Labour Code.

Compliance with our Code of Conduct, within the EDF Group, consolidates its strategy for the future. This common code is the vector of the values shared and taken forward collectively. It protects the sense of our professional commitment.



HOW DO I WHISTLEBLOW?

EDF has put in place an ethics, compliance and duty of care whistleblowing procedure to flag some breaches. This system is independent of the other reporting “channels” that already exist in the company (managers, staff representatives, etc.), which the whistleblower is free to choose from. Whistleblowing is not an obligation and constitutes a right.

WHO CAN WHISTLEBLOW?

The whistleblowing system is open to alerts issued by:

- a natural person in good faith;
- a legal person acting in good faith whose interests are affected by the facts that are the subject of the alert.

WHAT FACTS CAN BE REPORTED?

The facts that may constitute one of the following may be reported:

- a violation of the law or an attempt to conceal a breach of the law in connection with the EDF Group;
- a violation of an international commitment ratified by France, of European Union law or of the Code of Conduct in conjunction with the EDF Group;
- a threat or damage to the general interest in connection with the EDF Group;
- a serious risk to or infringement of human rights and fundamental freedoms, the health and safety of people or the environment, in conjunction with the EDF Group and its business relations.

RESPECT FOR CONFIDENTIALITY AND PROTECTION OF THE WHISTLEBLOWER

The Group's whistleblowing system guarantees the strict confidentiality of the reported facts, as well as the personal data of the whistleblower and of the person(s) involved or mentioned in the alert. This information is therefore only accessible to managers and experts (HR, LD, IS, etc.) responsible for handling the alert under the confidentiality conditions required by the legislation in force.

This confidentiality applies without prejudice to the possibility for EDF to implement disciplinary and/or litigation proceedings relating to the reported facts as soon as the investigations carried out as part of the handling of the alert enable them to be established. Testimonials of witnesses and/or victims are used in the context of these proceedings in accordance with the requirements of the legislation in force. The rules applicable to confidentiality are detailed in [the Whistleblower Support Guide](#) available in the [“Ethics & Compliance”](#) community on Vivre EDF online and on the [dedicated page of the EDF website](#).

The Group's whistleblowing system guarantees protection against any retaliation or discriminatory measures, for any whistleblower who meets the conditions defined above and stated in the support guide mentioned above.



WHISTLEBLOWING PROCEDURE

Whistleblowers have the choice to send their alerts:

- either to the GECD (Group Ethics and Compliance Division): verbally or in writing or via the outsourced reporting platform;
- either with the Ethics and Compliance Officers (ECOs) or line management, human resources and any other functions authorised in the local implementation note only in writing.

Alerts can be entered in the group whistleblowing system using a form available on a dedicated external platform accessible from the EDF website (www.edf.fr) and completely disconnected from EDF's information systems.

- For alerts on the platform, the GECD alert committee is informed and the whistleblower receives an acknowledgement of receipt within 7 days, provided that a secure exchange box has been created on the platform.
- For alerts made outside of the platform, whistleblowers receive an acknowledgement of receipt within 7 days, provided that they have used a channel allowing them to be recontacted.

Each alert is subject to an admissibility examination in order to determine, before the initiation of the investigation, whether all the criteria related to the whistleblower and the reported facts are met (see above "Who can whistleblow?" and "What facts can be reported?" »). The purpose of a second examination is to analyse whether the whistleblower is likely to be recognised as such and to benefit from the relevant protection, subject to a final court decision.

The conditions for being granted the status of whistleblower are described in the [Whistleblower Support Guide](#) available in the "[Ethics & Compliance](#)" community on Vivre EDF online and on the dedicated page of the EDF website [link].

- If the alert is admissible, the GECD notifies the whistleblower and informs them of the name of the person chosen to investigate the alert. The GECD ensures that the person chosen to handle the alert is not in a potential conflict of interest situation, and has the skills and means necessary to conduct this process. The designated person responsible for the investigation signs a specific confidentiality agreement before accessing the data of the alert. The said person shall have a maximum period of three months to provide the whistleblower with information on the measures considered or taken to remedy the purpose of the alert and the reasons for the alert.
- If the alert is not admissible, the person who issued it is notified, the file is closed and the data is deleted from the system as soon as possible. The whistleblower can be redirected to appropriate contacts to manage the reported situation outside the whistleblowing system.

All elements collected during the investigation phase are kept securely on the platform or on the secure storage medium chosen by the entity. At the end of the inquiry, an investigation report is written by the person responsible, who reaches a conclusion on the veracity of the reported facts and recommends an action plan. The whistleblower is informed of the result of the handling and the closure of their alert. Once the alert has been closed, the file is archived after the personal data is anonymised.