

# RESPONSIBLE ADVOCACY CHARTER

EDF GROUP



**April 2024** 



AS A GLOBAL LEADER IN LOW-CARBON ENERGIES, EDF GROUP IS AN INTEGRATED ENERGY COMPANY, WHOSE CORE BUSINESSES ARE: GENERATION, TRANSMISSION, DISTRIBUTION, ENERGY SUPPLY, TRADING, AND ENERGY SERVICES.



# Advocacy and the Importance of Aligning with Ethical and Environmental Principles in the EDF Group and in all its entities<sup>1</sup>

Advocacy refers to any action carried out by one of the Group's interest representatives, aimed at exercising influence over public authorities or providing them with information, with a view to guiding a political decision<sup>2</sup>. The purpose of advocacy is to defend the EDF Group and all its entities' interests and provide public decision-makers with technical expertise regarding the consequences and practical scope of legislation in force or under consideration. Designed to defend the Group and all its entities' interests, advocacy activities are entrusted to people who do not themselves harbor interests that may be in conflict with those of the Group and all its entities.

Within EDF Group, advocacy activities are placed under the responsibility of top management of EDF Group's interested entities.

The EDF Group is engaged in an accountability process focusing on the 10 Recommendations by the United Nations High-Level Expert Group on the Net-Zero Emissions Commitments of Non-State Entities (UN HLEG). Indeed, EDF is committed to carry out all its direct and indirect public advocacy action in line with the Paris Agreement and its objective of limiting global warming within 1.5 °C above pre-industrial levels through the engagement with institutional stakeholders, trade associations, non-governmental organizations and academic.

EDF is also committed to conduct all its advocacy in line with its Raison d'être<sup>3</sup> and its Just Transition principles. EDF's Raison d'être is enshrined in the Company's bylaws, it is at the heart of its business model and is reflected in its Corporate Social Responsibility commitments. Sharing our ethical values and complying with laws and regulations are at the heart of our commitment and reflect our corporate responsibility.

<sup>&</sup>lt;sup>1</sup> In this document, "EDF Group entities" or "EDF Group companies" refer to fully consolidated companies.

<sup>&</sup>lt;sup>2</sup> Article 25 of French law no. 2016-1691 of December 9, 2016 on transparency, the fight against corruption, and modernization of the economy, known as the "Sapin II" law

<sup>&</sup>lt;sup>3</sup> EDF Raison d'Etre "to build a CO2 neutral energy future, by reconciling the preservation of our planet, well-being and development thanks to electricity and to innovative solutions and services"





We recognize the significance of direct and indirect advocacy as an influential means to shape public policies that impact our industry. In acknowledging this, we commit to conducting our direct and indirect advocacy activities with the utmost integrity, transparency, and responsibility, guided by our core values of ethical conduct, sustainability, and societal accountability. In addition, EDF follows its own ethics and compliance Code (www.edf.fr).

This Charter applies to EDF Group and all its entities, in France and worldwide. It applies primarily to all the internal and external stakeholders involved in the advocacy activities on behalf of EDF Group. For subsidiaries whose shares are listed on regulated markets, or subject to the competence and power of financial market supervisory and regulatory authorities, the Charter will be implemented while respecting and preserving current the organizational structures and governance.

### **Objectives of advocacy**

- 1. **Promote the Public Interest:** We commit to advocating for public policies that enhance the overall well-being of society, with a focus on efficiency, sustainability, and accessibility of public services.
- 2. **Transparency:** We commit to act transparently in all our interactions with policymakers, providing comprehensive and accurate information about our positions, activities, and impact on society.
- 3. Adherence to Ethical Standards: We commit to uphold the highest ethical standards in all our advocacy activities, avoiding any unethical behavior, corruption, influence peddling, or any.

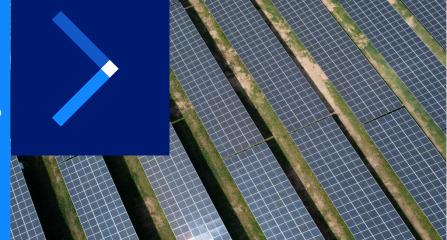


- 4. **Open Dialogue:** We will foster open and constructive dialogue with policymakers, regulatory bodies, and stakeholders, encouraging an exchange of information and ideas that contributes to well-informed public policies.
- 5. **Social Responsibility:** We commit to integrating social and environmental concerns into our advocacy activities, seeking to promote policies that foster sustainable development, diversity, and inclusion through our Raison d'Être and our Just Transition principles.

## **Guiding Principles**

- 1. Legal Compliance: We will respect all laws and regulations regarding advocacy and ensure that our activities comply with local and international legal standards.
- 2. **Professional Ethics**: We will act with integrity and professionalism in all our interactions with policymakers, avoiding any behavior that could compromise our reputation or that of the company.
- 3. **Conflict of Interest Management**: We will proactively identify and manage any potential conflict of interest that may arise during our advocacy activities, ensuring transparency and appropriate disclosure.
- 4. Accountability: We will be accountable to our stakeholders, providing regular reports on our advocacy activities, positions, and contributions to public policies.
- 5. **Continuous Evaluation:** We commit to regularly evaluate the impact and effectiveness of our indirect advocacy efforts, adjusting as necessary to align with evolving industry and societal needs.
- 6. **Employee Training:** We provide ongoing training and guidance to employees involved in advocacy activities to ensure understanding and adherence to this charter.
- 7. **Promoting Awareness:** We communicate our advocacy charter internally and externally to promote awareness of our commitment to ethical advocacy practices.
- 8. **Financing of political parties:** The EDF group complies with the laws and regulations in force concerning the financing of political parties. In countries where it is allowed, EDF group companies may determine whether they wish to provide financial support. In such case, the financing shall comply with the principle of neutrality. Every year, the Group companies concerned must report any financing to their parent company.

By adopting this charter, we reaffirm our commitment to conducting direct and indirect advocacy activities responsibly, contributing positively to the utilities sector and broader society, and upholding the values and reputation of EDF.





# **Adoption and Implementation**

When advocating, EDF employees and representatives must behave in a transparent and responsible manner, respecting the following principles:

- Identify themselves as EDF employees or as acting on behalf of EDF before engaging in an advocacy action or any public intervention;
- Develop arguments always based on reliable, verified and up-to-date information;
- Respect the positions of other stakeholders;
- Comply with laws, regulations, conventions etc. governing advocacy, and follow the codes of conduct of the institutions being lobbied;
- Communicate and defend positions that are in line with EDF's strategic framework and Raison d'Être;
- Be identified by their own EDF Division;

#### They must never:

- Try to influence the position of a public official by offering him undue advantages, or by inciting to the violation of the ethical rules of the institution;
- Use, for commercial or advertising purposes, information obtained from an institution, or sell to third parties any copies;
- Seek information or decisions dishonestly, or by use of undue pressure or inappropriate behavior;
- Deceive or mislead third parties and/or public officials, or claim any formal relationship with institutions in their dealings with third parties;

All engaged employees involved in advocacy activities will contribute to the yearly review process of this charter.

#### Signatures :

Carine De Boissezon, Chief Impact Officer





*Erkki Maillard,* Senior VP government and international affairs.