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It is up to all employees in their day-to-day behavior, in the way they do their jobs and in their business dealings with others to apply the Group’s values and ethics principles:

- Acting in accordance with laws and regulations.
- Establishing a culture of integrity.
- Behaving fairly and honestly.
- Respecting others.

Each person should seek to use good sense and judgment in his/her actions, which is why it is normal and natural to discuss the ethical questions and dilemmas inherent in any professional activity with colleagues and line managers. Identifying ethical acts and avoiding mistakes are processes that contribute to the
pursuit of excellence. Ethical behavior requires both personal and team commitment.

Because of the specific responsibilities they exercise, managers must convey GDF SUEZ’s ethical principles to the employees under their authority. They are also responsible for deploying and implementing the Ethics policy and the Compliance policy in the organization of the operational and functional sectors of the Group’s entities.

Managers are therefore obliged, not only to give their employees practical information on the rules that they must follow, but also to ensure that these rules are understood. They must also provide guidance and encourage their employees to discuss their ethical concerns and their questions regarding the application of the rules. They should not hesitate to inform their line manager or the entity’s ethics officer of any difficulties encountered in applying this policy. Finally, it is up to managers to verify that their employees correctly follow the rules they are required to apply. However, it is primarily through the example of their own behavior that managers communicate the message of ethical practice and the meaning of compliance to their employees.

Everyone, regardless of their function, is responsible for their own behavior and has to accept the consequences of their decisions. If anyone commits an unethical act, depending on the circumstances, he or she is liable to disciplinary and administrative action, and perhaps, even legal civil or criminal penalties. The enforcement of these penalties forms part of the regulations applicable within their entity.

In the case of an unethical instruction, both the person carrying it out and the person giving it are at fault. Anyone pressurized to act against the principles of GDF SUEZ or against their own conscience should feel free to speak about it to someone who can give them guidance.

**ACTION POINT**

**APPLYING THE PRINCIPLE OF SUBSIDIARITY**

The Group’s ethical documents set down rules and general principles. Group entities are expected to apply and adapt them under the principle of subsidiarity, in keeping with local rules and the policies set by the management of the entity. For example, the Group accepts the principle of gifts, provided that they are reasonable; there should never be any doubt as to the honesty, independence and objectivity of the giver and of the recipient. Obviously, a converse policy applies to the giving of gifts in countries where the law prohibits such practices. Within legal parameters, the Group policy can also be adjusted to incorporate thresholds on the value of gifts, within the discretion of an entity’s management. Locally, managers must give their employees clear instructions regarding the thresholds on the value of gifts.
Unifying Practices at All Levels

The Ethics Charter describes the general ethical principles that all employees need to apply in their professional practices and in their behavior towards everyone with whom our Group has dealings.

These principles are structured within three circles.

THE CIRCLE OF THE GROUP

The first field of application of GDF SUEZ’s ethics principles is the circle comprising the Group’s employees, Group entities and shareholders.

Employees

At all levels, GDF SUEZ sets demanding standards for harmony in human relations. In this respect, every individual is responsible for maintaining the right physical and psychological conditions for all employees to work effectively and comfortably. This means that respect for the individual is paramount in the exercise of authority and in the relations between management and employees. The Group seeks to foster collegial relationships based on courtesy, consideration, recognition and discretion. GDF SUEZ will not abide any form of bullying or sexual harassment.
Respecting diversity and private life, the Group is primarily concerned with the competence of its employees. The high degree of professionalism that GDF SUEZ seeks and demands fosters individual development, in both the professional and private sphere.

The Group places particular value on team spirit, based on open and constructive dialogue that strengthens cohesion. The Group makes every effort to keep its employees informed about its objectives and challenges in order to foster their involvement in the life of the company.

GDF SUEZ seeks to ensure that the wages it pays in every country are sufficient to ensure decent living standards.

The Group also takes all proper measures to maintain the health and safety of their employees at the workplace.
Group entities

GDF SUEZ seeks to maintain transparent and balanced relations with its entities.

In particular, the Group makes sure that the information exchanged between them is accurate and genuine. When circumstances require GDF SUEZ entities to do business with each other, they apply the same standards of fairness as in their dealings with outside clients, suppliers or partners.

Group entities operating within regulated contexts follow the required procedures, particularly regarding commercially sensitive information.

Finally, at local level, the Group entities set up fair and consistent measures that will enable the Group’s Ethics Charter to be implemented and to fulfill its requirements.

Shareholders

The ability of our Group to develop depends in particular on its capacity to find the capital it needs to invest.

Shareholders trust GDF SUEZ not only to manage the company soundly, but also to improve its performance.

To this end, we apply the highest standards of “corporate governance” with the aim of providing our shareholders with optimum growth and return on the capital invested.

As well as applying the rules set by the financial regulatory authorities, the Group is also committed to equality in the treatment of its shareholders and makes it a point of honor to provide swift, accurate, transparent, genuine and verifiable financial information.
THE CIRCLE OF THE MARKET

Beyond the Group, GDF SUEZ’s ethical standards also apply to its relations with the circle of the market, its clients, suppliers and competitors.

Clients

Our clients’ satisfaction and therefore the viability of our Group, depend on clearly identified factors: responsiveness, imagination, innovation, constant improvement in quality and traceability, particularly with regard to health and safety, and inclusion of the social dimension in public service activities. These demands entail an open dialogue, based on accurate and genuine information, adherence to the rules regarding commercially sensitive information, transparency in the Group’s procedures and, of course, the respect of commitments and the compliance with competition rules.

Suppliers

The quality of the products and services that GDF SUEZ supplies to its clients also depends on its capacity to obtain excellent services from its suppliers and partners. For this reason, the way we choose our suppliers must be transparent and meticulous. The Group selects them for their professionalism and their competitiveness, with the aim of building a relationship of mutual trust.

All negotiations must fulfill the quality principles set within the Group. In this regard, procurement decisions must be a collective process involving all the parties concerned. Relations with suppliers must be governed by equity and impartiality in order to preserve a balanced and rational relationship. Buyers must be impeccable in their ethical standards and comply with the regulations, in particular those relating to competition.
The pursuit of high ethical standards is also reflected in the inclusion of environmental and societal factors in the criteria used to select suppliers.

GDF SUEZ requires its commercial partners, subcontractors and suppliers to establish their own ethical, environmental and social rules, if they have not already done so, and also to maintain practices that are compatible with the Group’s values.

**Competitors**

Our Group obeys the rules of the market. In this respect, it complies with the rules applicable to competition and regulated markets by dealing fairly, and refrains, among other things, from slandering or denigrating its competitors. It uses only legal and honest means to collect information on its competitors.

Finally, it protects its confidential data and manufacturing secrets and the data and secrets of others it has undertaken to keep confidential.
THE CIRCLE OF SOCIETY

GDF SUEZ is taking on the big energy challenges of the 21st century. These objectives can be achieved by respecting the commitments on behalf of sustainable development defined within the Group.

The community

GDF SUEZ’s activities place it at the heart of the communities where the Group operates. It lays great emphasis on supporting those host communities. GDF SUEZ maintains an active policy of support for vulnerable populations, working in concert with the public authorities when the need arises. It also conducts corporate patronage and sponsorship and actions to gain a foothold in local communities by consultation and through partnerships, in order to promote local authority initiatives.

These activities must be open, transparent and legal.

GDF SUEZ sees integrity as one of the founding principles of its ethical stance. It condemns corruption in all its forms and shields employees who act with integrity from any damages that might result from their actions.

In this sphere, the Group refrains from the funding of any political activities, except in countries where such funding is authorized within a legal framework. In this case, any funding will be carried out in strict compliance with applicable laws and with all defined internal policies.

Finally, GDF SUEZ work with local people and organizations in a spirit of understanding and respect for all cultures. In connection with field initiatives that are consistent with its activities, the Group maintains a dialogue and partnership with non-governmental organizations (NGOs) in the environmental and humanitarian sectors. It also encourages its employees to get personally involved in civic and community initiatives.
GDF SUEZ adheres to the highest ethical standards

GDF SUEZ’s principles of action are rooted in international reference models, in particular:

- The Universal Declaration of Human Rights and Additional Protocols
- The standards of the International Labour Organization (ILO), the Guidelines for Multinational Enterprises laid down by the Organisation for Economic Co-Operation and Development (OECD)
- The United Nations Convention against Corruption

The planet

The environment, its protection and sustainable development are particularly important to GDF SUEZ. The Group’s sustainable development policy specifically stresses this by stating that respect for human beings and respect for the environment are the foundation of GDF SUEZ’s identity and values.

The Group is aware of its responsibilities to present and future generations, and hence defines its strategy, sets its objectives in keeping with the principles of sustainable development and makes its records available to the public.

It obeys local legal and regulatory requirements. It also listens to the wishes of its clients, local people, employees and the community.

It is alert to the impact and consequences of its activities and is also careful to ensure that its environmental objectives are shared by its partners, its suppliers and, where applicable, the owners of the facilities it operates.
The Group uses the methods and techniques most likely to promote sustainable development.

It encourages research and innovation to develop expertise in quality and safety, in optimum utilization and recycling of materials, in economic use of natural resources and in reducing environmental damage.

Behaving ethically and in line with the Group’s regulations and commitments, i.e. implementing the compliance procedure, is a constant goal of GDF SUEZ.

It is therefore incumbent on each one of us to assume our professional responsibilities as identified and evaluated in consultation with management.
However, the variety and diversity of circumstances makes it impossible to foresee all possible cases. To find a solution that meets our ethical standards, it is sometimes necessary to seek advice.

Depending on the nature of your questions, you can approach a work colleague, the management line – starting with your manager or another manager with skills relevant to your question (human resources, safety, legal, etc.) and, of course, an ethics officer.

Insofar as it may concern the behavior of people we know, asking a question of an ethical nature is often tricky.

So it takes courage, even daring, to tackle these subjects and describe the dilemma.
However, it is the only way to put an end to unacceptable practices and to begin the process of improvement.

Anyone who in good faith expresses concerns relating to ethical matters or compliance will not be exposed to any sanction as a consequence of their initiative.

Any employee who is a victim of or witness to such practices may refer them to their entity’s ethics officer or the Group Ethics Officer, who then has a duty to work with management to find the means to protect or re-establish the legitimate rights of the people concerned.

In all circumstances, ethics officers are obliged to strictly maintain the confidentiality of information communicated to them.

**LEARNING ABOUT ETHICS**

Training courses for functional and operational managers are available in live or online format. The topics covered mainly concern:

- Induction into the ethical principles of the company
- Business ethics
- Competition rules in the European Union
- Anticorruption measures in international development
- Ethics in relation to public contracts
- Management responsibility: ethical risk, internal control, audit

For any additional information, consult the Ethics and Compliance Division, or the ethics officer for your entity or business line.
GDF SUEZ provides its employees with an e-mail address on which they can contact the Group Ethics Officer if they are not sure what to do or have observed violations of the ethics and compliance rules.

This procedure is not an alternative to other existing reporting channels (line management, personnel representatives, public body, etc.), but an additional channel. It should be used in accordance with local regulatory requirements, since certain regulatory regimes impose compulsory procedures.

Any abusive use of the procedure may result in prosecution and, conversely, no proceedings may be taken against a user acting in good faith. The identity of the user and that of any accused person are kept confidential, and disciplinary actions may be applied if confidentiality is not maintained.

The primary target of the procedure is any violations relating to accounting, financial audit and the fight against corruption, as well as other serious infringements that may threaten the vital interests of the company or the physical or moral integrity of its employees.

Other violations are likely to be dealt with under local regulations. Alerts may be addressed to entity ethics officers and/or the Group Ethics Officer by any means, in particular by e-mail to the following address: ethics@gdfsuez.com

**DID YOU KNOW**

All the documents relevant to the Ethics Charter and to these guidelines are accessible to all Group employees on the intranet site and on the dedicated Ethics extranet site.
ACTION POINT

Who you should first contact:

- You are not sure what to do or what procedure to follow.
- You want advice.
- You think that the company’s rules are in the process or on the verge of being violated.
- You think that you are or are going to be involved in an action that goes against your company’s rules.

In all these circumstances, consult someone you can trust: either your colleagues, your line or other manager, the legal division, an employee representative if legally permitted, or the ethics officer, within your entity or, if required, another such Group representative outside your entity.

Everything You Need to Know about Ethics and Compliance within the Group

The Group’s Ethics Principles

- Acting in accordance with laws and regulations
- Establishing a culture of integrity
- Behaving fairly and honestly
- Respecting others

http://ethics.gdfsuez.com
password: ethics
Key Day-To-Day
Ethical Reference Points

When we encounter an ethical problem, we should never lose sight of the reference points set out in these guidelines, or hesitate to seek guidance from management.

**Fraud**

Corporate fraud is a sensitive subject and its impact is often understated. However, fraud generates financial costs that can be high and hard to recover and, more broadly, it represents a risk for any individual and any company.

For GDF SUEZ, fraud, in all its forms, is unacceptable. Any fraudulent act is punishable by the penalties laid down in international or local law and by the Group’s internal rules.

Fraud is considered to be any deliberate and concealed action or omission, committed with the intention of deceiving or bypassing existing laws or the company’s rules, in order to obtain unwarranted material or moral advantage for the perpetrator of the fraud or for a third party.

Fraud takes multiple forms: theft of money, goods or data, deliberate falsification, concealment or destruction of documents, false entries or declarations, the manipulation of accounts, counterfeiting, money-laundering, swindling, corruption, etc.
Corruption

Corruption is the symptom of a critical problem, and is an obstacle to the smooth running of a company. It is illegal, generates costs by reducing economic efficiency, reflects a lack of community spirit and can undermine the dignity and integrity of those who inadvertently experience its consequences. That is why GDF SUEZ forbids corruption in all its forms, whatever the time, the place or the circumstances. In short, corruption is an illegal agreement between two or more people. It is a form of fraud.

There are two general categories of corruption:

- **Active corruption** consists in offering someone an advantage in order to influence a decision-making mechanism (license, right, supply, contract, etc.).
- **Passive corruption** consists in accepting an advantage in return for using one’s influence to affect a decision. Passive corruption can happen without active solicitation. It can include practices as serious as extortion.

Corruption takes concrete form through actions of different kinds such as gratuities, commissions, gifts or payoffs, private use of public goods, misappropriation, unwarranted payment for a public service, etc. The last case is an example of extortion which is a form of corruption.

Extortion consists in making the award of a contract or license conditional on the provision of an unwarranted consideration in return, through the exercise of pressure that can extend from occasional or daily demands for money, to exaggerated administrative red tape, or even physical threats to individuals and their families.

Acts of corruption are sometimes facilitated through the use of intermediaries such as business consultants in the attempt to mask or conceal the acts from prosecution. To prevent such arrangements, the Group has established an internal framework procedure for the engagement of business consultants that is compulsory in its application.
Competition

The Group attaches the greatest importance to respecting the rules of competition and rejects all anti-competitive practices. Its employees are expected to behave impeccably in their relations with competitors, clients, suppliers and prospective clients. Proscribed activities notably include: illegal competition agreements, abuse of dominant position, acts of corruption, the exchange of insider information, discriminatory, excessive or predatory pricing, etc.

Group employees use only legal and ethical methods to find out information about their competitors. By way of example, the use of intrusion and false identity is prohibited. They do not slander or denigrate their competitors and refrain from taking advantage of inaccurate, falsified or distorted information.

Finally, when a Group entity is operating in a regulated market, it must ensure that employees are informed of the provisions that apply to them and monitor their implementation.

Gifts, invitations and trips

As a general rule, the Group seeks to minimize the number and cost of gifts and invitations, be they offered or received by Group employees. Their frequency and amount must be decided by management. To find out how this policy is applied in their entity, employees should ask their line manager.

Gifts and invitations are marks of courtesy, so they need to match local tastes and customs. Never accept to give or receive a gift or an invitation which, for one reason or another, makes you feel uncomfortable or is likely to make the other party or the people around you feel uncomfortable. Finally, any trip offered or accepted by an employee, in or for the exercise of his or her functions, must first be authorized by management.
**Conflicts of interests**

A conflict of interests is a situation in which the judgment of a person who is acting in a professional capacity may be excessively influenced by a secondary interest, distinct from that of the company. This is the case, for example, when an employee finds him or herself in a situation where they might take a decision not on the grounds of their company’s interests, but of their own interests, or those of a relative or friend.

If in doubt, employees are advised to check with their line manager that there is no conflict of interests. This advice is particularly pertinent if you, or someone close to you, have interests in a company or body that is a client, competitor or supplier of the company. It is also pertinent if you are engaged in a professional activity outside the company. Likewise, if you have responsibilities in nonprofit bodies or communities that are clients of a Group entity, you are advised to abstain from voting on matters pertaining to contracts or decisions regarding a Group entity. For their part, GDF SUEZ’s financial officers are required to report any potential or actual conflicts of interests to their line manager or their entity’s ethics officer, in accordance with the Group’s “Code of Conduct for Financial Officers”.

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**Case study: Assessing a potential conflict of interests**

*If you answered yes to one of the five questions below, you may be facing a conflict of interests.*

1. Do I or anyone close to me, outside the company to which I belong within GDF SUEZ, hold a position of executive, owner, manager, employee or consultant in a company:
   - that supplies services or goods to my company or a Group entity?
   - that is in competition with my company or a Group entity?

2. Do I or anyone close to me, outside the company to which I belong within GDF SUEZ, have a direct or indirect financial interest in a company:
   - that supplies services or goods to my company or a Group entity?
   - that is in competition with my company or a Group entity?
   - whose activity is very similar to the work that I personally do within the Group?

3. Do I or anyone close to me have the opportunity to contribute to a decision or to give a recommendation regarding relations between a GDF SUEZ entity and a company external to the Group that meets the criteria set out in questions 1 and 2?

4. Do I or anyone close to me have the opportunity to contribute to a decision or to give a recommendation regarding a GDF SUEZ company in exercising my role within a political or voluntary organization?

5. Have I or anyone close to me accepted or plan to accept or been offered a gift, a trip or any other material or financial benefit from a supplier, a client or a competitor?
Lobbying

The Group defines lobbying as the promotion of the interests of its entities by providing opinion leaders and/or the leaders of the communities within which its entities operate, with objective technical, economic and corporate information. The aim is to enhance the Group’s reputation, to promote its image, its values, its activities and its services, and to defend its interests.

When an institution or a country regulates the activity of lobbyists, entities must meet these regulatory obligations and only employ professional lobbyists who do the same. Similarly, when there is a code of conduct or an ethical code of practice for lobbyists issued by their professional bodies, lobbyists acting on behalf of Group entities must follow these codes.

Whatever the circumstances, lobbyists must always reveal the identity of the people or bodies for whom they are acting when taking part in lobbying meetings. Similarly, they must not give or receive payment in return for information.

The Group places particular emphasis on the risks that lobbyists may face with respect to conflict of interests and corruption. Any employee, especially when working abroad, should take care not to give the impression that the Group or the entity that they represent is seeking to exercise undue influence over the internal political affairs of the country.

Corporate patronage and sponsorships

Corporate patronage and sponsorship initiatives are permitted under the Group’s policy set out in the Sponsorship and Partnerships Charter. They reflect a civic-minded and socially responsible approach. Only people duly authorized by their line manager can order or initiate these operations.

Employees are required to check the appropriateness of these initiatives, which should not create conflicts of interests or constitute a covert form of funding.
**Funding of political activities**

The Group refrains from all funding of political activities, except in countries where such funding is authorized within a legal framework.

In all circumstances, contributions should be kept at a minimum and partisan or one-sided attitudes should be avoided. The Group Ethics Officer must be informed in advance of any donations. GDF SUEZ entities must refrain from contributing to the funding of institutions, parties or candidates holding extremist views.

**Communication**

In their communication policy, Group entities work to ensure that the information they provide is accurate, precise, comprehensible and timely. Apart from their managers, only duly authorized people have the right to speak on behalf of Group entities.

An employee who wishes to speak in public, publish or give an interview on a subject affecting a Group entity must therefore receive permission to do so from an authorized person (except in special circumstances defined by the regulations). Any employee not so authorized may nevertheless speak freely, provided that they first specify that they are speaking or writing in a personal capacity and not on behalf of their entity. In particular, they should ensure that they do not associate their entity with a partisan position, and that they do not use their position in the entity to lend credibility to their personal views.
In the course of their work, all employees are required to manage or hold large amounts of information. This may relate to clients, personnel, their company or, more generally, their company’s economic, commercial or legal environment (commercial or financial partners, suppliers, government bodies, other Group companies, etc.).

As a general rule, any information that has not purposefully been made public by GDF SUEZ or its entities should be considered confidential. Information for which there are specific regulations in some of the Group’s spheres of activity, such as commercially sensitive information, should be treated with particular care.

Both within and outside GDF SUEZ, employees are advised to maintain maximum discretion with regard to information, of any kind, originating from or relating to their company. If you need to communicate such information to another person to enable them to do their job, make sure that you only give them the specific information they require, particularly if such information originates wholly or partially from a third party or service provider. In addition, tell them the level of confidentiality of the information communicated to them.

A large proportion of the confidential information to which employees have access is in electronic form, which is why the Group has set 12 rules on information systems which everyone must follow.
Insider information and insider trading

Insider information is deemed to be any specific information that has not been officially made public relating directly or indirectly to a listed company, which, if it were made public, could have an impact on the stock price of that company or on the financial products linked to that stock (shares, bonds, loans, options to buy or sell, etc.). Some privileged information may also relate to financial instruments. A person who holds insider information is called an insider. The law on “insider trading” prohibits anyone who handles insider information about a listed company from buying or selling the stock of that company, or even advising or suggesting that a third party should buy, sell or retain that stock, for periods determined by local regulations.

This prohibition applies to the stock of the company in which that person works as well as the stock of any other listed company about which he or she holds insider information.

Genuineness and truth of documents, traceability

It is generally advisable to document the main steps leading up to a decision or initiative for which an entity or an employee may be potentially liable, so that these steps may be traced later if required. This may apply to any document used to establish scientific, technical, administrative, accounting or financial results. These documents must be retained in compliance with applicable regulations.

The documents we establish, as well as those archived, must accurately reflect the facts, places and dates of which they are a record. All employees shall refrain from establishing false documents or falsifying documents. Anyone who suspects the existence of such a document must immediately inform their line manager, or the ethics officer for their entity. Finally, these documents and other corporate records must be retained for the term and in the form required by applicable laws and regulations.
**Delegation of authority**

Whether manager or employee, each person contributes to the company’s global performance and has a share of responsibility corresponding to the scope of their role. In this respect, in order to guarantee that skills, obligations and responsibilities are properly distributed, the management must ensure that delegations of authority and the necessary signatures are effectively established and operational, according to the principles defined by the Group General Secretariat.

**Intellectual property**

Just as employees have the obligation to protect the Group’s intangible assets, they must also respect both the Group’s
intellectual property and that of others. For example, they should not make unauthorized use of patents and copyrights or engage in unauthorized copying or plagiarizing of brands, studies, projects or publications belonging to others.

**Protection of the company’s assets**

The assets of Group entities must be used solely for professional purposes, in legitimate conditions and with the right permits.

It is the responsibility of all employees to do what they can to protect and make effective use of these assets, to avoid damaging them and to ensure that they are not used fraudulently. This rule applies equally to tangible assets (properties, premises, equipment, supplies, etc.) and intangible assets (patents, information, image, software, brands, reputation, manufacturing secrets, etc.).

An employee who observes that protective measures are inadequate must inform his or her line manager, and do the same in the case of theft or attempted theft, piracy, espionage, sabotage or vandalism.

**Environment, health and safety**

GDF SUEZ is careful about the impact of its activities on all its stakeholders and the natural environment.

That is why our Group has developed a rigorous environmental and health and safety policy. Personal involvement and vigilance are needed for this policy to progress into lasting, increasingly ambitious and firm commitments, reflecting a respect for individuals, society and the planet.
Supplier relations: 7 ethics principles

- Comply with laws, regulations, external standards, Group values and internal procedures.
- Treat suppliers with equity, transparency and impartiality.
- Ensure that mutual commitments are kept.
- Keep the confidentiality of all information exchanged.
- Ensure that the Group’s commitments with regard to ethical standards, sustainable development and corporate responsibility are known and maintained.
- Avoid any conflict of interests which may undermine objective and independent decision-making.
- Report any situations which are in breach of these rules.

Procurement and suppliers

Employees with third-party relationships should show particular vigilance in terms of ethical behavior. This includes employees who work with suppliers, service providers and subcontractors: product advisers, buyers, supply-chain consultants, managers and, more generally, anyone involved in the act of buying. These employees must follow the principles laid out in these guidelines, and also comply with the ethical rules of the Group’s procurement policy that apply to them in the day-to-day performance of their functions.

To find out more, look up the codes of practice in procurement policy on the intranet site or the dedicated Ethics extranet site.

Human rights

The Group has identified respect for others as one of its fundamental ethical principles. For this reason, it places particular emphasis in each of its activities on respect for the spirit and letter of the 1948 Universal Declaration of Human Rights.

Employees are asked to consider the impact of their actions and decisions on people, and to ensure that people are not damaged either in their integrity or in their dignity through the actions of a Group entity or one of its employees.
The Group is also particularly vigilant with regard to the sensitive situations to which it may be exposed, for example, in fields such as the respect for displaced populations or compliance with the rules on the protection of property in sensitive areas.

In this respect, every GDF SUEZ employee must refrain from practising discrimination of any kind, whether by word or deed, in particular with regard to age, gender, ethnic, social or cultural origin, religion, political or union activity, personal lifestyle choices, physical appearance or disability.
Ethics are an evolving field. Documents relating to ethical practices are subject to constant revision and update to incorporate best practices under the imperatives of continuous improvement.

In the event of conflicting interpretations, only the French text will be considered as authentic.

All ethics-related GDF SUEZ documents are accessible on the GDF SUEZ website, the Group intranet and on the dedicated Ethics extranet site. To receive information or guidance on ethical practices and compliance: ethics@gdfsuez.com

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Our values

drive
commitment
daring
cohesion