



September 2022

Corporate Social Responsibility Policy

Together let's make the transition a success



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A company of ENGIE

Foreword and Undertaking by the Management Committee

2021 marks an important turning point for Elengy with the unveiling of its Company Project: Reinventing 2025 «Together let's make the transition a success» and formalising its purpose: « **For the men and women at Elengy their mission is to provide access to ever safer and more sustainable energy and thus contribute to meeting the planet's environmental challenges** ». It places CSR at the heart of the company's strategy and business.

In line with its purpose and consistent with the company's project « **Reinventing 2025** », our CSR Policy embodies our key commitments around three strategic challenges:

1. **Take action to protect our planet**
2. **Grow sustainably**
3. **Protect and foster the human development of our employees**

This is implemented by each of Elengy's Departments which:

- identifies the CSR commitments which most concern them,
- sets out their objectives,
- rallies staff around the corresponding action to be taken.

This policy covers all of Elengy's sites and engages all of us.

Nelly Nicoli, CEO



Our CSR policy

Structured around 3 strategic challenges, this policy sets out Elengy's 12 CSR commitments with quantitative targets and thereby contributes in achieving the Sustainable Development Goals defined by the United Nations.

Challenge 1: Take action to protect the planet

- Commitment #1 : Ensure the industrial safety of terminals
- Commitment #2 : Reduce our carbon footprint related to GHG emissions (CO₂/CH₄) for the three scope (direct, indirect by our activity and other indirect emissions)
- Commitment #3 : Adapt to climate change
- Commitment #4 : Protect the environment and biodiversity at our sites
- Commitment #5 : Develop sustainable procurement

Challenge 2: Grow sustainably

- Commitment #6 : Be recognised as a reference for the development of sustainable solutions for the ecological transition of heavy mobility (trucks, trains, ships) or for end-users in remote areas
- Commitment #7 : Develop offers, services and innovative carbon neutral projects

Challenge 3: Protect and foster the human development of our employees

- Commitment #8 : Ensure the health, safety and well-being of our employees
- Commitment #9 : Improve the employee experience
- Commitment #10 : Through work-study programmes foster the upkeep and transfer of our skills and ensure solidarity amongst generations
- Commitment #11 : Use diversity as an asset for performance
- Commitment #12 : Act in accordance with our ethical principles in all circumstances

Our commitments

Challenge 1: Take action to protect the planet

Commitment #1: Ensure the industrial safety of terminals

- **Objective N°1: 0 serious accidents and at least 90% of the maintenance programme carried out each year**
- **Objective N°2: 0 formal notices from the DREAL (Regional and Interdepartmental Directorate for the Environment)**

Mastering industrial equipment requires policies that are regularly reviewed and that take into account feedback from operations and best available techniques. For many years now Elengy had had policies in place in the following areas:

- Industrial safety and major accidents prevention,
- Safety of industrial control systems,
- Asset and maintenance management,
- Definition, selection and monitoring of safety functions.

The guiding principles for industrial safety are as follows:

- Transparent communications with stakeholders,
- Regulatory compliance,
- Selection of safe equipment and processes,
- Facility operations and works management,
- Continual improvement loop taking into account feedback.

Elengy manages industrial risks related to its activity by establishing and applying safety rules, through hazard and operability analyses (HAZOP¹) and the analyses of accidents and high severity potential events², through staff training courses, internal and external audits and by updating hazard analysis studies and through emergency situation management exercises too (including with our stakeholders: DREAL, SDIS...).

In addition to ISO 9001 (Quality) and 14001 (Environment) certification audits, audits are also carried out by DNV in relation to the Isrs9³ reference's PSM (Process Safety Management) module. The latter measures the efficiency of industrial safety management. Furthermore, LNG terminals are subject to regular inspections by the Direction Régionale de l'Environnement, de l'Aménagement et du Logement (French Regional Department for the Environment, Planning and Housing).

¹HAZard and OPerability analysis

²High Potential (Incident/event)

³International Safety Rating System de DNV

Commitment #2: Reduce our carbon footprint related to GHG emissions (CO₂/CH₄) for the threescopes:

- **Objective N°1: by 2025 reduce our direct and indirect greenhouse gas emissions (CO₂ and CO₄) by 20% compared to 2019 levels**
- **Objective N°2: by 2025 reduce our CH₄ emissions by 30%**
- **Objective N°3: by 2030 reduce our direct and indirect greenhouse gas emissions (CO₂ and CO₄) by 40 % compared to 2019 levels**

To meet the challenges of climate change, Elengy undertakes to reduce its greenhouse gas emissions according to a target that is compatible with the Paris Agreement and France's national low carbon strategy.

To do this Elengy will adapt and optimise its equipment and operating methods in order to reduce its methane emissions and its own needs in gas and electricity (strategic challenges 1 and 2).

For its procurement (strategic area 3) Elengy will choose low-carbon solutions for both its routine procurement and its modes of operation. Similarly, Elengy will make investment decisions and undertakings after having considered a carbon impact assessment of its projects based on a life cycle analysis.

Elengy is a member of the Oil & Gas Methane Partnership 2.0 which is part of the United Nations Programme for the Environment with support from the European Commission. The purpose of this programme is to support companies in their commitment to reduce methane emissions.

Commitment #3: Adapt to climate change

- **Objective N°1: by end 2022 define a climate change adaptation plan**
- **Objective n°2: Implementation of a climate change adaptation plan starting starting in 2023**

In addition to Elengy's commitment to reduce its carbon footprint, the company must prepare itself for the consequences of climate change.

Three initiatives will be carried out in this respect:

- By using both accepted climate predictions and studies carried out locally, establish and update the risks that the terminals could face in the next few decades by considering two deadlines: 2030 and 2050.
- By 2022 establish a LNG terminal adaptation plan. This shall include:
 - The possible effect of extreme weather events on the terminals' capacity to deliver commercial services due to their clients;
 - The measures planned for preventing or minimising the effects of extreme weather events on their organisation and on equipment.
- Roll out this adaptation plan starting in 2023, in particular by integrating it into investment programmes.

Commitment #4: Protect the environment and biodiversity at our sites

- **Objective N°1: ecological management plan (differentiated management of green spaces) to be established for each terminal by end 2022 in order to protect biodiversity**
- **Objective N°2: travel policy and a working from home agreement established by mid 2022**
- **Objective N°3: by 2024, and per site, achievement of an emblematic project related to the environment**
- **Objective N°4: Obtain ISO 50001 “Energy Management System” certification for the Fos-Cavaou LNG terminal in 2022 and in 2024 for the Fos-Tonkin and Montoir-de-Bretagne terminals**
- **Objective N°5: Implement and monitor energy performance indicators**

Elengy takes pride in protecting resources and maintaining the ecosystem in the zones where its three LNG terminals are located (study of fauna and flora, the use of alternatives to plant protection chemicals, the development of ecological niches, participation in species conservation, improvement of knowledge by supporting research and environmental dialogue with our stakeholders).

Elengy is continuing to improve its integrated management system, in particular in the area of environmental protection, by maintaining ISO 140001 certification at its industrial sites and by assessing significant environmental aspects and implementing action plans so that its environmental impacts are positive. Elengy is also looking at its working methods (travel, working from home).

Elengy is continuing its local presence enabling it to better understand the expectations and needs of stakeholders, to exchange and to find mutually beneficial agreements with its stakeholders.

In terms of energy, we commit to controlling our own energy consumption and improve our energy efficiency as well as raise the awareness of our employees and service providers working on site in using energy in an efficient and rational manner. In a continual improvement process, Elengy is aiming at having its 3 terminals ISO 50001 certified by the end of 2024.

Elengy’s management has created an Energy Team that is responsible for coordinating and monitoring the management system, the application of the energy policy and compliance to legal and other requirements. The team ensures the wise use of energy, suggests improvements and integrates everyone’s suggestions.

Commitment #5: Develop sustainable procurement

- **Objective N°1: 80% of procurement from suppliers who have been assessed by EcoVadis**

Within the Engie Group's Procurement and Ethics Policy we aim to work closely with our suppliers towards a sustainable business.

This is why Elengy works with a third-party partner, EcoVadis, who assesses Elengy's main suppliers in order to monitor and measure social and environmental performance in its supply chains.

By choosing EcoVadis as a partner, Elengy uses its expertise in CSR and on its on-line tools enabling CSR assessment and reporting to be optimised:

- Confidential and appropriate CSR questionnaires as well as an expert analysis;
- A CSR Assessment Sheet shared with a supplier's other clients;
- Des outils pour étalonner et améliorer les pratiques RSE des fournisseurs.

EcoVadis has developed a CSR ranking methodology based on 21 criteria covering the following themes: environment, social and human rights, ethics and sustainable procurement.

Combining economic efficiency and positive impact on people and the planet in accordance with our purpose is a real challenge, but we can play a role by supporting our suppliers in order to help them progress in the fields of CSR.

To achieve this Elengy is aiming at increasing the consideration of CSR criteria in the Procurement policy with the following targets:

- By mid-2022, all major suppliers (more than 300K€/year over several years) will have been assessed by EcoVadis;
- By end 2025, 80% of our procurement will be with suppliers assessed by EcoVadis.

The progress made by suppliers in relation to CSR commitments following assessment by EcoVadis is subject to regular supervision and monitoring. Strategic suppliers must implement remedial action plans within a continual improvement process. However, if we do not have a guarantee that their practices comply with the Group's Procurement and Ethics Policy suppliers may see their access to contracts restricted.

Furthermore, along with all of its stakeholders including its suppliers, Elengy is committed on a daily basis to accelerating the transition towards a carbon neutral world, thanks to less energy-consuming environment-friendly solutions.

Challenge 2: Grow sustainably

As regards its work on developing new infrastructures or new services at its terminals, Elengy undertakes to respect the following sustainable development principles:

- Promote projects whose total carbon impact (including investments) up to and including final usage is positive compared to the end-user alternatives.
- Choose technical solutions that have the least environmental impact.
- Ultimately promote projects that are compatible with low-carbon energy vectors but which do not create carbon lock-in technologies requiring significant reinvestment and wasted expenses in order to circumvent these.
- Be transparent with our clients about the environmental impacts of our projects.
- -Actively contribute to the emergence of low-carbon energy production projects.

These principles are in particular reflected by the following commitments:

Commitment #6: Be recognised as a reference for the development of sustainable solutions for the ecological transition of heavy mobility (trucks, trains, ships) or for end-users in remote areas

- **Objective N°1: Achieve a total of 10 TWh per year for the small-scale LNG business in 2025**
- **Objective N°2: Contribute to the reduction of carbon emitted by our clients up to 600,000 tonnes of CO₂ equivalent per year in 2025**

This commitment will be reflected in the development of new loading capacities for small-scale LNG carriers, tanker trucks or transport by rail at our terminals using best available technologies in safety and environmental impact. It will also be reflected in the sustainable expansion of the LNG distribution zone by developing, insofar as possible, logistical solutions that include rail and even waterways.

Where alternatives are costly in terms of CO₂ (end-users in remote areas dependant on coal/fuel, for example), Elengy shall look at developing suitable LNG solutions compatible with the 2045 zero carbon targets.

These solutions concern above all logistical infrastructures but Elengy will endeavour to also contribute to the development of renewable LNG production that these infrastructures could use.

Commitment #7: Develop offers, services and innovative carbon neutral projects

- **Objective N°1: Launch 2 projects in new gases by 2025**

Although an asset manager, Elengy must and can actively contribute to the development of low-carbon containing processes, particularly for the needs of heavy land and sea mobility (trucks, trains, ships) but without prejudging at this point vectors and technologies.

These targeted areas initially require more research and development and a broadening of the stakeholders involved.

Many areas of work have been identified at this stage:

- The development of biomethane liquefaction projects,
- The industrial integration of pyro-gasification processes at one of our terminals,
- The capture and storage of CO₂ generated at our terminals by the industrial-harbour platform,
- Development of a methane unit upstream in the LNG chain,
- Development of a hydrogen synthesising unit using LNG generated through pyrolysis,
- ...

Challenge 3: Protect and foster the human development of our employees

Commitment #8: Ensure the health, safety and well-being of our employees

- **Objective N°1: 0 serious accidents involving people**
- **Objective N°2: ISO 45001 “Occupational Health and Safety Management System” certification in 2024**

In terms of health and safety at work, the company aims at providing everyone, employees or service-providers, with a safe working environment.

In the company, accident prevention is based on:

- The regular updating of the professional risks evaluation document (DUREP) and related actions plans,
- The establishment of a procedure that guarantees that site works can be undertaken in complete safety. This collection of documents is regularly updated by taking into account feedback from operations,
- The involvement of management, in particular through site visits (inspections, on-site meetings, etc.),
- The analysis of accidents, near-accidents and dangerous situations and the cross-referencing of accidents between sites in order to prevent the same event from happening at another site,
- A shared “Safety Culture” approach so that each and every person plays a role in their safety and that of others.

As this involves Quality of Life at Work (QWL) and psycho-social risks, the company is committed to boosting its health and safety policy by training all employees in first aid techniques and by deploying and ensuring the implementation of the 9 managerial commitments defined by ENGIE for a better quality of life at work.

Commitment #9: Improve the employee experience

- **Objective N°1: 75% of employees engaged by 2025**

The different annual surveys sent out to our employees show a satisfactory rate of engagement but one which could be improved. Our aim is to improve the employee experience and obtain an engagement rate of 75%.

To accomplish this we intend to:

- Provide employees with the resources to be fully involved in the development of their own careers and career changes. This will be achieved by updating our job skills and competencies reference and through a trained employee rate that should never be lower than 85%,
- Improve manager/staff relationship by providing each manager with a personalised development plan,
- Ensure that there is permanent dialogue with the Personnel Representative bodies respecting all their rights so that employees can be effectively represented at every level of the company.

To measure the progress in the level of engagement of our employees we will set up an employee-survey type tool, specific to Elengy, in addition to the ENGIE Group's annual survey.

Commitment #10: Through work-study programmes foster the upkeep and transfer of our skills and ensure solidarity amongst generations

- **Objective N°1: to have a rate of employees in work-study positions of 10% each year**
- **Objective N°2: recruit at least 2 women from amongst work-study employees in a technical profession between 2021 and 2023**

For many years Elengy has invested in the work-study system by recruiting young people having obtained an educational diploma ranging from a professional baccalaureat (Bac pro) up to those having studied up to 5 years in higher education, and by training them in the industry's professions. Elengy favours this system, especially for maintenance technician or supervisor posts, thereby ensuring the upkeep and transfer of skills that Elengy needs.

Investing in work-study placements is also essential to promote the inclusion of young people in the company and making the transfer of know-how between experienced workers and trainees a vector of solidarity amongst generations.

We aim at transforming 50% of our work-placement contracts into other types of contracts, and 30% of these into permanent contracts within the Group.

Commitment #11: Use diversity as an asset for performance

- **Objective N°1: achieve a female worker rate of 25% in 2025**
- **Objective N°2: achieve a minimum female worker rate each year of 33% amongst work-study trainees**
- **Objective N°3: achieve a female management rate of 30% in 2025**

For Elengy diversity is a source of undeniable wealth. Elengy implements numerous initiatives to create environments that foster diversity within our teams as well as an inclusive culture.

Allow everyone to fully participate in society, such is our definition of inclusion. In regards to employing disabled persons, we wish to maintain and grow the employment rate without losing sight of the legal rate of 6%. We endeavour to recruit a minimum of 1 disabled employee under a permanent contract and 2 disabled employees under work-study contracts for the duration of the agreement (2021-2023).

In particular, the place of women in the company requires our full attention. In terms of equal opportunities amongst men and women and the fight against gender bias, which is an obstacle for including women in the workplace, Elengy's endeavours are outlined in the collective agreement that was recently signed with the trade unions.

Our objectives are as follows:

- Increase the percentage of women in Elengy's technical teams,
- Increase the percentage of women managers,
- Achieve a minimum rate of 35% of women amongst work-study contracts (by integrating women within technical areas).

Commitment #12: Act in accordance with our ethical principles in all circumstances

- **Objective N°1: 100% of Elengy employees to receive ethical training by 2023**

Ethics and independence are at the heart of Elengy's activities. Elengy's ethical approach endeavours to both protect employees and the company and to boost the trust of various stakeholders.

The ethical principles specified in the ENGIE Group's Ethics Charter are applicable to Elengy and its subsidiaries. There are four, simple messages that can be applied to the professional work of employees:

- act in compliance with laws and regulations,
- be honest and promote a culture of integrity,
- demonstrate loyalty,
- respect others.

In the area of ethics, safety is a major focus for the company with an employee awareness-raising target of 100% by 2023. An annual report from the compliance officer containing actions to be carried out and a review of those carried out, is presented to Elengy's Board of Directors every year.

As a liquefied natural gas facility operator subject to obligations imposed by the French Energy Code, the compliance to which is controlled by the French Energy Regulation Commission (CRE), Elengy meets its obligations in terms of transparency, non-discrimination and the protection of commercially-sensitive information. As a company that is part of a Vertically Integrated Company, Elengy complies to the rules on independence in regards to the gas transmission operator, GRTgas. These obligations are covered in Elengy's Code of Good Conduct, published on its website. Failure to meet the related rules and undertakings exposes Elengy to various penalties and sanctions.

Our commitments expressed as objectives

Engagement	Objectifs	ODD	Horizon
Commitment n°1: Ensure the industrial safety of terminals	0 serious accidents		Every year
	At least 90% of the maintenance programme carried out each year		Every year
	0 formal notices from the DREAL		Every year
Commitment n° 2: Reduce our carbon footprint related to GHG emissions (CO2/CH4) for the three emission profiles	Reduce greenhouse gas emissions (CO2 and CH4) by 20% compared to 2019 levels		2025
	Reduce our CH4 emissions by 30% compared to 2015 levels		2025
	Reduce greenhouse gas emissions (CO2 and CH4) by 40% by 2030 compared to 2019 levels		2025
Commitment n° 3: Adapt to climate change	Define a climate change adaptation plan by 2022		2022
	Implementation of a climate change adaptation plan		Starting in 2023
Commitment n° 4: Protect the environment and biodiversity at our sites	Ecological management plan to be established for each terminal by end 2022 in order to protect biodiversity		2022
	Travel policy and development of distance working agreement		2022
	Achievement per site of an emblematic project related to the environment		2022
	Obtain ISO 50001 "Energy Management System" certification for the Fos-Cavaou LNG terminal in 2022 and in 2024 for the Fos-Tonkin and Montoir-de-Bretagne terminals		2022/2024
	Implement and monitor energy performance indicators		2022/2024
Commitment n°5: Develop sustainable procurement	80% of procurement from suppliers who have been assessed by EcoVadis		2025
Commitment n° 6: Be recognised as a reference for the development of sustainable solutions for the ecological transition of heavy mobility or for end-users in remote areas	Achieve a total of 10 TWh per year for the small-scale LNG business		2025
	Contribute to the reduction of carbon emitted by our clients by 600,000 equivalent tonnes of CO2 per year by 2025		2025
Commitment n° 7: Develop offers, services and innovative carbon neutral projects	Launch 2 activities in new gases		2025

Engagement	Objectifs	ODD	Horizon
Commitment n° 8: Ensure employee health, safety and well-being of our employees	0 serious accidents involving people		Every year
	ISO 45001 "Occupational Health and Safety Management System" certification in 2024		2024
Commitment n° 9: Improve the employee experience	75% of engaged employees	  	By 2025
Commitment n° 10: Through work-study training foster the upkeep and transfer of our skills and ensure solidarity amongst generations	Have a rate of employees in work-study positions of 10% each year		Every year
	Recruit at least 2 women from amongst work-study employees in a technical profession between 2021 and 2023		2023
Commitment n° 11: Use diversity as an asset for performance	Achieve a female worker rate of 25%	2025	
	Achieve a minimum female worker rate each year of 33% amongst work-study trainees	Every year	
	Achieve a female management rate of 30%	2025	
Commitment n° 12: Act in accordance with our ethical principles in all circumstances	100% of Elengy employees to receive ethical training		2023

Elengy's CSR governance

CSR is managed at the highest level of company's management by the CEO, who validates the CSR policy and both the commitments and action plans.

The Technical Department manages operations and monitors Elengy's CSR performance and reports to Elengy's management and Board of Directors.

The CSR policy is included in the company's integrated management system related to cross-business management for each of the 12 commitments. Each CSR commitment is monitored by Commitments Manager, appointed by General Management to manage, coordinate and ensure that those concerned implement the action plans and/or initiate the work required in order to achieve the objectives set, in a rationale of continual improvement.

Each Department undertakes to roll out the CSR objectives that concern it through management contracts and business roadmap.

The Technical Department, in coordination with the Communications Department and the Company Project's Steering Committee, ensures that the CSR policy is implemented, and in particular follows up the action plan, the achievement of commitments and the internal and external communications on CSR.

The Technical Department is also responsible for certification operations which contribute to Elengy's performance in CSR: ISO 9001 (Quality), ISO 14001 (Environment), ISO 50001 (Energy), ISO 45001 (Occupational Health and Safety) and ISRS/PSM (Industrial Safety).



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