

ethics in practice



Practical guide

This guide of ethics in practice details the application of the ethics rules in the relations with clients, competitors, partners, suppliers and all of SUEZ's stakeholders, in accordance with the values and ethics principles set out in the Group Ethics Charter.

It is also complemented by the guide « Ethics in commercial relations », which further details the whole range of commercial relations.

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1. A demanding ethical commitment

It is up to all employees in their day-to-day behavior, in their relations within the company, with clients, partners, suppliers and towards all other stakeholders, to apply SUEZ's values:

PASSION FOR ENVIRONMENT

RESPECT

CUSTOMER FIRST

TEAM SPIRIT

These values must thus be for each of us the reference for our collective and individual behavior and action.

Due to the complexity and the diversity of situations, and the necessity to seek excellence, the Group's employees are encouraged to discuss potential incidents with their management line, with the Ethics Officer of their entity or with the Group Ethics Officer.

TO WHOM ARE THESE PRACTICAL GUIDELINES AIMED?

They are aimed at the employees (permanent or temporary) of the SUEZ Group, regardless of their job title, and at any person seconded from an outside company to a Group entity. They are also aimed at any person acting on behalf of the Group.

Because of the specific responsibilities they exercise, managers must convey SUEZ ethical principles to the employees under their authority. They are also responsible for deploying and implementing the "Ethics" 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 supposed to apply.

However, it is primarily through the example of their own behaviour that managers communicate the message of ethical practice and the meaning of compliance to their employees.

Everyone, regardless of their position, is responsible for their own behavior and has to accept the consequences of their decisions. If an employee commits an unethical act, depending on the circumstances, he or she is liable to disciplinary, administrative, or legal (civil or criminal) action, pursuant to local and international regulations. 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 SUEZ or against their own conscience should feel free to speak about it to someone who can give them guidance and may in particular contact the Ethics Officer in the home entity freely and in full confidentiality.

The principles of ethics stated above apply at three levels, which are:

- **The relations within the Group, consisting of its employees, its operational entities, and its shareholders;**
- **The relations with the main players on our markets: our customers, our partners, our suppliers and our competitors;**
- **The relations of the Group with the environment in which it operates: civil society, and, in general, all its stakeholders.**

2. How to deal with an ethical problem?

DID YOU KNOW?

All the documents relevant to the Charter and to these Guidelines are accessible to all Group employees in the SUEZ book (on the Group's intranet).

LEARNING ABOUT ETHICS

In addition to the face-to-face trainings organized in the Group's entities, e-learning modules are also available. The topics covered in these courses mainly relate to:

- SUEZ's ethics values;
- Anti-corruption rules;
- The Group's gifts and invitations policy;
- Conflicts of interests;
- Human rights and the duty of care;
- The reporting of non-ethical situations.

For any additional information, contact the Ethics Officer of your entity (contact information available on the Group intranet ethics page).

Employees have access to a number of documents that explain the objectives and content of the Group's ethics policy and that give concrete examples. 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 raise questions.

You are encouraged to raise any concerns you may have. Indeed, this will help us all ensure that we comply with the Group ethics rules at all times.

You can discuss ethics issues with:

- Your management;
- The Ethics Officer of your entity or the Group Ethics Officer (ethics.asia@suez.com);
- Your human resources department or your legal department (depending on the situation).

The organization of ethics within SUEZ

The implementation of the ethics program is the responsibility of the General Secretary, acting as Group Ethics Officer. Ethics is managed by the Ethics and Compliance Department, with the support of an Ethics Officers network, organized according to the Group operational structure (at Business Unit and Business Area level).

As part of their mission, the Ethics Officers are notably in charge of:

- Communicating and if necessary, explaining the charters, codes or guidelines that define the Group's ethical commitments, to all employees, in close liaison with the management;
- Running awareness-raising, training and communication initiatives;
- Answering employees' questions and giving advice on ethics;
- In collaboration with the departments concerned and with a sufficient amount of autonomy, addressing ethical alerts;
- Identifying the entity's ethical risks.

The contact details of all these Ethics Officers are available on the Group intranet.

For additional information regarding ethics governance and the role of Ethics Officers, you can refer to the Group Ethics Charter.

Ethical reporting channel

In order to ensure that ethical values are complied with, the Group has put in place an internal ethical reporting system. This system can be used by all Group's employees (including temporary workers, interns, etc.) acting in good faith and with no personal interest, reporting facts of which they have personal knowledge (no rumors or hearsay), as well as by all stakeholders of SUEZ, notably its customers, partners, providers or shareholders.

WHICH SITUATIONS CAN BE REPORTED ?

- Information as to a criminal offence or fraud (acts of corruption, misappropriation of funds, appropriation of company goods, internal fraud, etc.);
- Information as to a conflict of interests, a situation of collusion (with competitors, clients, subcontractors, etc.);
- Situations causing a damage to the environment (or a risk there of) by SUEZ, its subsidiaries, subcontractors or providers;
- Any other situations which appear contrary to the Ethics Charter (improper behavior, violation of confidentiality of information, etc.).

WHO CAN BE CONTACTED ?

You can contact :

- The Ethics Officer of your entity (contact details available on the Ethics & Compliance page of the intranet)
- The Group Ethics Officer (ethics.asia@suez.com)

All reports are addressed within a reasonable time and confidentiality is ensured. No disciplinary action will be taken against employees having reported facts in good faith, even if the allegations subsequently appear inaccurate or do not result in any consequences or sanctions. Disciplinary actions may only be initiated in the event of employees making an abusive use of the system or in the case of libel.

For additional information regarding the ethical reporting channel, you can refer to the "Group Procedure for the reporting of non-ethical situations" and to "The user's guide Whistleblowing procedure" (available on the SUEZ book Ethics & Compliance page).

3. Key day-to-day ethical reference points

Communication

In their communication policy, Group entities work to ensure that the information they provide is accurate, complete, precise, comprehensible and timely. Only duly authorized people have the right to speak on behalf of SUEZ or its entities.

An employee who wishes to speak in public, publish or give an interview on a subject affecting a Group entity must do so in consistency with the positioning of SUEZ and therefore receive permission from an authorized person or his/her entity's Communication department (except in special circumstances defined by the regulations). Indeed, whenever an employee speaks in the name of SUEZ, not his/her responsibility is at stake, but also that of the Group.

Any employee not so authorized must explicitly specify that he/she is not speaking on behalf of the Group. In particular, he/she must ensure that the Group is not associated with a partisan position, and that he/she does not use his/her position within the Group to grant credibility to personal opinions.

In case of doubt as to the adequate behavior, contact the Group or your entity's Communication Department directly.

SOCIAL MEDIA USE GOOD PRACTICES

To be sure of your legitimacy to express yourself on social media on behalf of SUEZ, ask yourself the following questions:

- Is what you have to say consistent with the SUEZ Group's stance on the subject?
- Could the subject harm the Group's reputation?
- Is what you have to say measured and respectful?
- Do you know how to use the social media?
- Are the users talking about the subject controversial and influential?
- Is the information that you want to publish accurate and backed up by a reliable source?
- Are you expressing yourself in a transparent manner, as a clearly identified employee of your company?
- Would you say the same thing to a colleague, friend, or stranger?
- Is the information that you want to publish strategic and/or confidential?

For additional information, you can refer to the « Social media guide » available on the Group intranet.



Question

In response to an article on environmental companies on the internet, I was shocked to discover comments criticising the scandalous behavior of large groups in the sector. Some even claim that our Group does not respect existing regulations and that it pollutes with impunity. I resolved to defend my company and decided to respond to these malicious rumours from my personal account.

Does this present an ethical problem?

Answer

If you express yourself on behalf of the Group or one of its entities, you must be authorized to do so and you must do it in consistency with the positioning of SUEZ.

If you want to talk in your personal capacity about a sensitive issue linked to the activities of SUEZ, you must show restraint when expressing your opinions or beliefs and it is preferable that you discuss it with the Communication Department beforehand.

If you have any doubt as to a situation and on the appropriate conduct, you must contact the Group or your entity Communication Department.

Competition

The Group attaches the greatest importance to respecting competition law.

SUEZ employees must behave impeccably in their relations with competitors, clients, suppliers and prospective clients.

On a day-to-day basis, SUEZ employees must:

- Respect the principles of fair and loyal competition;
- Act with integrity in relations with competitors, clients, suppliers and prospective clients;
- Protect the confidentiality of information pertaining to the group and information lawfully exchanged with competitors when specific circumstances allow it and in accordance with applicable procedures.

PROHIBITED PRACTICES

The following practices are prohibited during bid preparation and submission:

- Joint price or margin fixing.
- Market sharing.
- Unfair exclusion of competitors.
- Prohibited exchange of commercially sensitive information.

If you have any doubt or if you are facing an unclear situation, you must contact the Group Legal Department.



Question

One of my relatives, who works for a competitor, is offering to help me fast-track my career by giving me his company's answer to a call for bids on which my department has been working for several weeks. Considering that my interests and those of the Group are the same, why shouldn't I accept the offer?

Answer

SUEZ's principle is to respect the rules of competition and reject any exchange of information which could compromise it. As an employee of the Group, you must adhere to ethics rules above all else. The practice proposed by your relative is unfair and anti-competitive. You must turn down this type of information exchange.

In case of doubt, you must contact the Group Legal Department for details as to applicable regulations.

Confidentiality

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 been made public 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.

SOME GOOD PRACTICES WITH RESPECT TO INFORMATION SYSTEM AND CONFIDENTIALITY

- I will not leave sensitive documents on printers or meeting rooms and I will keep to the tidy desk policy by storing items under lock and key.
- I will be responsible for the visitors that I receive and I will never leave them alone on Company premises.
- I will switch on the secure screensaver whenever I leave my office.
- I will not open any attachments on suspicious emails and will not respond to such messages.

FOUR LEVELS

- All documents issued within the Group must display a degree of confidentiality in accordance with the following scale, « strictly confidential », « confidential », « internal », « public ».
- When a document is not classified, it is considered for "internal" use, by default.

Both within and outside 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 with 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 rules on information systems which everyone must follow.

For additional information, you can refer to the "Policy on information classification and on SUEZ confidentiality protection" available on the intranet.

Conflicts of interests

No other activity or interest you may have, on the job or in your free time, should conflict, or give the appearance of conflict, with your responsibilities at SUEZ.

A conflict of interest is a situation in which the judgment of a person who is acting in a professional capacity may be influenced by a secondary interest, distinct from that of the company.

HOW TO PREVENT A CONFLICT OF INTERESTS

- You should not be responsible for making decisions towards a client, competitor or supplier of the Group if you have other interests or reasons which may bias your decision-making.
- If you hold responsibilities with public or private bodies which are clients of the Group, you should abstain from participating in discussions and from voting on matters pertaining to awarding contracts to a Group entity or from making a decision about such a contract.
- Be careful also with situations which could, from a third party's perspective, have the appearance of a conflict.

WHAT TO WATCH OUT FOR

- Any decision that might be taken not on the grounds of the Group's interests, but of their own interests, or those of relative or friend.
- Financial interests in a company where you could personally affect SUEZ's business with that company.
- Gifts of other than nominal value from suppliers, customers or competitors, particularly if you are making decisions (on SUEZ's behalf) that involve them.
- Suppliers who are owned or managed by your family members or close friend.
- Elected positions where your professional responsibilities as a SUEZ employee and your role as an elected official would not be clearly separated.

If you have any doubt or if you are aware of any conflict of interests, you should inform your management or the Ethics Officer of your entity.



Question

It is your job to review various suppliers' bids for a project. You realize that a friend of yours is the CEO of one of the companies that have submitted bids.

In your opinion, what should you do in this situation?

Answer

The first thing to do is to consult your management and/or the Ethics of your entity. They will be able to tell you how to proceed to ensure the conflicts of interests is properly managed and avoided.

Corruption

Acts of corruption are illegal. They are contrary to the Group's ethical values and would seriously damage the reputation of the Group. The Group businesses would be jeopardized at a global level.

SUEZ forbids corruption in all its forms, whatever the time, the place or the circumstances.

Corruption can be defined as the conduct of a person who solicits or accepts a gift or, more generally, a favor, in order to obtain or retain business or any other undue advantage in national or international activities.

- Corruption can be direct or indirect (i.e. through intermediaries or to the benefit of a third party).
- Corruption can be active (to offer, promise or solicit an advantage) or passive (to receive an advantage).
- Corruption can materialize through gifts or any other advantages, whether financial or not (services or other benefits in kind, e.g. employment of a related person) and irrespective of their value.

KEY POINTS

- Corruption can be towards a public official or a private party.
 - Favors that are offered do not necessarily need to be financial.
 - Corruption can be sanctioned even if it is committed in a foreign country.
 - Acting through a third party does not reduce the risk.
- In case of doubt regarding a situation, even if you are not directly involved or have refused to be involved, you should consult your Legal Department, your management or the Ethics Officer of your entity.

For additional details on applicable anti-corruption rules, you can refer to the practical guide "Ethics in commercial relations".



Question

A public officer suggested that I call one of his acquaintances to put an end to the administrative red tape that is slowing down the site for which I am responsible. Since I was tired of waiting, I contacted the person who assured me that the work could resume in less than a week if I pay a significant amount of money in cash.

What should I do?

Answer

You should immediately be suspicious of the situation. SUEZ policy is to formally refuse any undue payment for a public service. Accordingly, it is out of the question for the services of an intermediary to be used if you have questions about their integrity and the use of the funds that will be paid.

You must inform the Legal Department.

Data protection



SUEZ is committed to handling information responsibly and in compliance with applicable information security and privacy laws as well as its Ethics Charter, in order to protect the data belonging to employees, clients, partners and suppliers.

Confidential information about employees, customers, partners and suppliers must be used and protected in an appropriate manner.

DATA PROTECTION GOOD PRACTICES

- I ensure accesses are limited to individuals who need it for legitimate business purposes or are authorized by law to receive it.
- I avoid collecting more data than necessary, and storing that data for longer than necessary, from customers or other third parties
- I refrain from making unauthorized use of patents or engage in unauthorized copying or plagiarizing of brands, studies, projects or publications belonging to others.
- I pay attention to accidental loss or disclosure of data by not uploading confidential information to unrestricted folders or libraries.

PERSONAL DATA PROTECTION GOOD HABITS

For any question relating to personal data, you can contact the data protection officer of the relevant SUEZ NWS entities at:

- privacy.asia@suez.com
- privacy.china@suez.com
- privacy.hk@suez.com
- privacy.macao@suez.com
- privacy.taiwan@suez.com

In case of breach of confidentiality, you should contact your Legal Department.

For additional information on the rules defined by the Group to protect the personal data of employees, customers, partners and providers, you can refer to the "Group Personal Data Protection Policy".

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 SUEZ, fraud, in all its forms, is unacceptable.

SUEZ employees may not, in any circumstances, deliberately commit or omit any action 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, data, or equipment that belongs to the company;
- The use of the company's tangible assets and intangible assets for external activities;
- Deliberate falsification, concealment or destruction of documents;
- Manipulation of accounts;
- Counterfeiting, money-laundering, swindling...

These acts are punishable by law and are contrary to the Group's ethical rules.



Question

A colleague offered to help me move using a company utility vehicle outside working hours. Should I accept the offer?

Answer

Unless specific authorization is given, company property must be used in a context strictly related to your professional activities.

Your colleague's offer is no doubt well intended; however, you cannot accept it, especially since the vehicle is probably not insured for private use.

Funding of political activities

The Group's policy is to refrain from any funding of political activities.

In countries where this type of funding is allowed, the Group may, under certain conditions, consider contributions or forms of support.

In any case, these should be reduced to a minimum and remain the exception, while avoiding any semblance of partisan or biased attitudes.

The Group's Ethics Officer or the ethics officer of the relevant legal entity must be informed in advance of any donations.

SUEZ entities must refrain from contributing to the funding of institutions, parties or candidates holding extremist views.

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 management, 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.

Gifts and invitations

SUEZ has defined rules concerning gifts and invitations offered or received by the Group's employees.

The applicable key principles are the following.

- The gift/ invitation must comply with applicable laws.
- Timing: a gift/ invitation should never be given or received just before a decision is to be made (e.g. contract award).
- Value and frequency: gifts/ invitations must remain strictly exceptional in their frequency and limited in their value (within the limits set by your entity), so that the decision-making process remains neutral for each party in the business relationship.
- Intention: no one should ask for a gift/ invitation and no one should make a gift/ invitation with a view to influencing the behavior of others. It has to be given or received in good faith.
- Gifts/ invitations should never be offered or received by third parties (e.g. relatives or friends).
- The adequate traceability measures requested by your entity's rules must be complied with.
- Any travel invitation made or received in a professional context must be subject to prior approval from management and from the Ethics Officer of your entity.

TO DO

Before accepting or offering any gift, ask yourself the following three questions:

- Is the gift reasonable (frequency and value)?
- Is it intended to influence a decision?
- Would I be embarrassed if my colleagues or my competitors were aware of it?

You should also check the rules and approval thresholds defined for your entity.

In case of doubt, you can:

- Talk to your manager
- Refer to the Ethics Officer of your entity or to the Group Ethics Officer



Question

You decide to give a client very good tickets to a sports event. It is not why you did it, but it turns out that the client has just awarded a project to your entity. As a result, you are not keen to tell anyone else about the tickets you have bought.

Do some red flags come into play in this situation?

Answer

How reasonable the invitation is depends on the context. How much do the tickets cost? Is this a one-off gift, or do you often make the client presents like this?

You know that you are not trying to make the client feel indebted to you, but what might your competitors think?

By offering the tickets, it could look as if you were attempting to influence the client. Even though you are acting in good faith, you should speak to your manager or to the Ethics Officer of your entity to make sure that you are not running any risks here.

Health and safety

SUEZ is committed to protecting the health and safety of the employees, clients, subcontractors, and third parties wherever we operate.

This means complying with all applicable health and safety regulations.

TO DO

- Be committed to ensure SAFETY ALWAYS is part of day-to-day activities because at SUEZ safety is everywhere, anytime, with and for everyone;
- Apply the Group's Fair Culture policy;
- Understand and apply the correct safety procedures for your area, and in particular our 10 life saving rules;
- Assess the legal and reputational impacts of health and safety risks before starting or changing a process;
- Consider health and safety impacts in the design and production of products and services.



Question

My entity is operating a facility in consortium with another company. Although we apply the strict health and safety rules of the Group, I have become aware that our partner does not abide by the same standards for its employees and that there are safety issues on site.

Answer

You should immediately inform your management, the contract manager and your entity's Ethics Officer so that adequate measures and remedies to this unacceptable situation can be taken.

For additional information on the Group's policy, you can refer to the group Health & Security SharePoint on the intranet.

Human rights

The respect for human rights is a necessary condition for the sustainable exercise of the Group's activities.

SUEZ is committed to respect human rights in each country where it does business. This commitment has been in effect for a long time within the Group, namely through our Ethics Charter and our adherence to the Global Compact in 2008. It is reaffirmed in the Group's sustainable development commitments.

Respect of others is an ethical commitment of SUEZ. This is therefore a requirement at every level of the company and requires that we put people at the heart of our actions and decisions, whether they be employees, customers, or local communities living in the regions where we operate.

Given its activities, the SUEZ Group puts a special focus on the right to water and sanitation, and fully plays its role of promoter and actor in the implementation of the right to water and sanitation.

In the light of these fundamental challenges, our Group has adopted a specific human rights policy. This policy seeks to establish a formal and operational approach to ensure compliance with the Group's commitments.

Each SUEZ employee must commit her/himself to ensuring it is applied properly.



Question

I heard rumors claiming that one of our subcontractors is using forced labor and child labor on the worksite of one of the Group's plants. I contacted our subcontractor regarding his and he assured me that he was complying with the legislation.

Answer

Observing Human rights is an absolute priority for the Group. Even if the labor legislation varies from one country to another, it is an absolute requirement that our subcontractors comply with international standards regarding respect for workers and work by minors. Inform your line manager of these rumors and of the actions you have taken.

For additional information, you can refer to the "SUEZ Group Human Rights Policy", available on the Ethics and Vigilance page of the Group internet website.

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, is likely to significantly influence the stock price of that company or on the financial instruments linked to that stock (shares, bonds, loans, options to buy or sell, etc.).

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, for the period between the date on which the said person becomes aware of an insider information and the date on which the information is made public or stops being an insider information (project being abandoned for example), from:

- Buying or selling, on his/her behalf or for others, securities of that company; or
- Advising or suggesting that a third party should buy or sell these securities; or
- Communicating this insider information to another person outside of the ordinary course of his/her job.

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 may hold insider information.

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Question

I heard my manager talk to someone in the financial division about an ongoing strategic acquisition project.

Wouldn't this be the ideal time to buy company shares?

Answer

The information you obtained was not public.

Therefore, it is privileged information and falls into this category, even if you obtained it by accident.

Accordingly, you cannot carry out any market transaction on the company stock or ask anyone to carry out such a transaction, whether for your benefit or not.

In addition, you should suggest to your manager that he better protect the confidentiality of his information.

For additional information, you can refer to the “Code of conduct on the prevention of use of privileged information” available on the intranet.

Lobbying

Institutional relations (or "lobbying") aim at creating optimal conditions for the development of the Group's activities, whilst respecting the environment, health and the general interest. In the light of SUEZ's experience, our role is to give guidance on the consequences and practical impacts of the legislation and future public policies at local, national, European and international levels. SUEZ also brings technical expertise, in a long-lasting and constructive manner.

SUEZ employees engaged in lobbying processes commit to carry out their professional activities in accordance with applicable national, European and international laws and regulations. Each of their processes is conducted in compliance with the Group's Ethics Charter, as well as with all associated rules of ethics and good conduct

A TRANSPARENT APPROACH

SUEZ is registered:

- In the European Transparency register and, in the registers kept by the French parliament.
- In the numerical list established by the High Authority for the Transparency of Public Life in France.

For additional information, you can refer to the "Ethical and Responsible Lobbying Charter" available on the intranet.

Patronage and sponsorship

Patronage and sponsorship initiatives are permitted within the Group subject to compliance with local legal rules and with the Group policy.

They must be part of an overall strategic approach and must comply with the Group's ethics values and anti-corruption policy. All these partnership actions must be approved by an internal committee prior to their implementation (at the entity level, and, when relevant, at the Group level, in accordance with the relevant procedures).

The Group encourages initiatives in relation with solidarity, protection and promotion of the environment, sports (encouraging excellence, team and winning spirit) and culture.

Sponsorship and patronage actions must be consistent with the corporate purpose of SUEZ and must be carried out to the benefit of bodies which purpose, status, reputation and financial situation are such that there are no subsequent ethical or financial risks for the Group and/or its entities. Are thus excluded, in particular, all initiatives which would finance or benefit to entities which act in a manner or hold views which are non-democratic or non-compliant with human rights or which are in breach of rules applicable to the fight against corruption.

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Question

A public client asks you that SUEZ participate in patronage actions, which would consist of sporting and cultural initiatives on its territory. The Group participation would be of 120,000 euros amount over a three years' period.

Which actions do you have to conduct following this request?

Answer

Such a project is subject to the prior approval of the Group's Sponsorship and Patronage Committee in accordance with the terms described by the Group procedure.

For additional information, refer to the « Groupe Procedure for Patronage and Sponsorship initiatives » and to the procedure of your entity.

Procurement and suppliers

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

For additional information on the ethics principles applicable to the relations with suppliers, you can refer to the practical guide "Ethics in supplier relations".

The governance and the policies applicable to procurement must also be complied with.

SUPPLIER RELATIONS OUR ETHICS PRINCIPLES

1. Comply with laws, regulations, external standards, Group values and internal procedure
2. Treat suppliers with equity, transparency and impartiality
3. Ensure that mutual commitments are kept
4. Keep the confidentiality of all information exchanged
5. Ensure that the Group's commitments with regards to ethical standards, human rights, sustainable development and corporate responsibility are known and maintained
6. Avoid any conflict of interests which may undermine objective and independent decision-making
7. Report any situations which are in breach of these rules
8. Select and award contracts based on objective criteria
9. Respect the free activities of competition



Question

A friend of mine is in charge of procurement in a large international company. He usually applies an aggressive policy by not hesitating to disclose the content of offers by certain suppliers in order to motivate others to revise their pricing and their type of delivery. Although this practice seems unfair, it looks like it is often effective.

What is the Group's position towards such methods?

Answer

Employees who interact with suppliers or sub-contractors must ensure that their conduct remains above reproach. Regardless of the results obtained by your friend, they do not justify the use of such an approach. The confidentiality of proposals from our partners must be maintained and all suppliers should receive the same information.

In case of doubt, you must refer to your management and to the Ethics Officer of your entity.

Respecting others

Respect is a value of SUEZ. Each employee must act ethically and with integrity and respect the diversity of skills, personalities and background of others.

All forms of discrimination or sexism, harassment or bullying behavior towards others are prohibited. The Group guarantees a work environment in which all employees are respected, whatever their differences, be they of social or cultural origins, of gender, of sexual orientation or relating to their health condition.

WHAT TO WATCH OUT FOR

- A hostile work environment
- Insistent behaviors or other invitations for a social relationship with a fellow employee when he / she is not interested
- The influence of discriminating factors at the time of a decision/arbitration regarding recruitment, promotion, compensation or any other employment-related decision
- Beliefs or behaviors that tend to stigmatize, delegitimize or make colleagues feel inferior

WHO CAN BE CONTACTED ?

You can be helped by:

- Your supervisor, HR manager, or other manager having authority in this area;
- The Diversity and/or Harassment referent appointed by your entity;
- The Ethics Officer of your entity (contact details available on the Ethics page of the intranet);
- The Group Ethics Officer (ethics.asia@suez.com).

Helplines are also available in a number of entities in the Group.

All ethics documents and related procedures of SUEZ are available in the SUEZ book (available on the Group intranet) and on the website.

Your ethics referents are the Ethics Officer of your entity and the Group Ethics Officer

ethics.asia@suez.com

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