

HUMAN RIGHTS POLICY





Statement by the Chief Executive Officer



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At SUEZ, we consider that respect for human rights is a necessary condition for the sustainable exercise of our activities that lies at the heart of our relations with all our stakeholders. We recognize that economic players have their own responsibility to respect human rights within the framework of their business activities and we adhere to the international standards for the protection and defence of human rights which we strive to apply everywhere in the world.

Respect of others is an ethical commitment of our Group. 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. Analysing our impacts on the human rights of people, ensuring that our business relations respect these rights, and taking people's vulnerability into account in our activities are principles of conduct that must guide our everyday actions.

Naturally, we give special importance to the issue of access to essential services and the right to water and sanitation. We have long recognized our central role in promoting and enabling

implementation of this right, which today is part of our global objectives for sustainable development.

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

And I ask each SUEZ employee to commit itself to ensuring it is applied properly.



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In 2011, the United Nations “Guiding Principles on Business and Human Rights” explicitly recognized the responsibility of companies to respect human rights along with their related obligation to conduct ongoing due diligence to ensure that their activities do not negatively impact human rights.

These principles are recognized as a framework by companies and their stakeholders who ask them to set up processes for identifying, assessing

and managing the impacts of their activities on human rights, and to report on this matter.

Regulations also tend to increasingly incorporate the United Nations Guiding Principles, in particular the French law on due diligence requirements for parent companies and main contractors. This law requires that large French corporations set up a due diligence plan in order to prevent serious violations of human rights tied to

their activities, as well as those of their subsidiaries and main subcontractors.

Today corporate stakeholder expectations, the international soft law frameworks of reference, and the development of national laws are tending toward greater corporate accountability with regard to human rights, in particular parent companies and main contractors.



Objectives



SUEZ considers that conducting business activities in accordance with human rights everywhere it operates is an integral part of its responsibility. The Group is committed to respecting human rights in each country where it does business. This commitment has been in effect for a long time at SUEZ Group, namely through its ethics charter¹ and its adherence to the Global Compact in 2008. It is reaffirmed in the Group's 2017-2021 sustainable development commitments.

To ensure compliance and meet stakeholder expectations and French and foreign legal requirements, this Policy is

designed to formalise the Group's global human rights approach. In particular, it provides for the implementation of a global due diligence process designed to prevent negative impacts of all business activities on human rights, and to mitigate and repair them if they occur.

Given its activities, 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.

To define its responsibility and the conditions for implementing an effective due diligence process,

SUEZ refers to recognized international frameworks, and in particular to the "United Nations Guiding Principles on Business and Human Rights".

1. See Group Ethics Charter and ethics practical guide



Scope of policy



This Policy applies to all the activities of SUEZ SA and its subsidiaries included in its scope of consolidation.

The principles of this Policy are also to be promoted by Group employees who sit on the managing boards of companies which are not controlled by SUEZ.

Moreover, SUEZ employees are required, insofar as it is necessary, to inform the people they deal with, particularly their suppliers, service providers and subcontractors of the existence of this Policy and obtain from them the commitment to comply with.





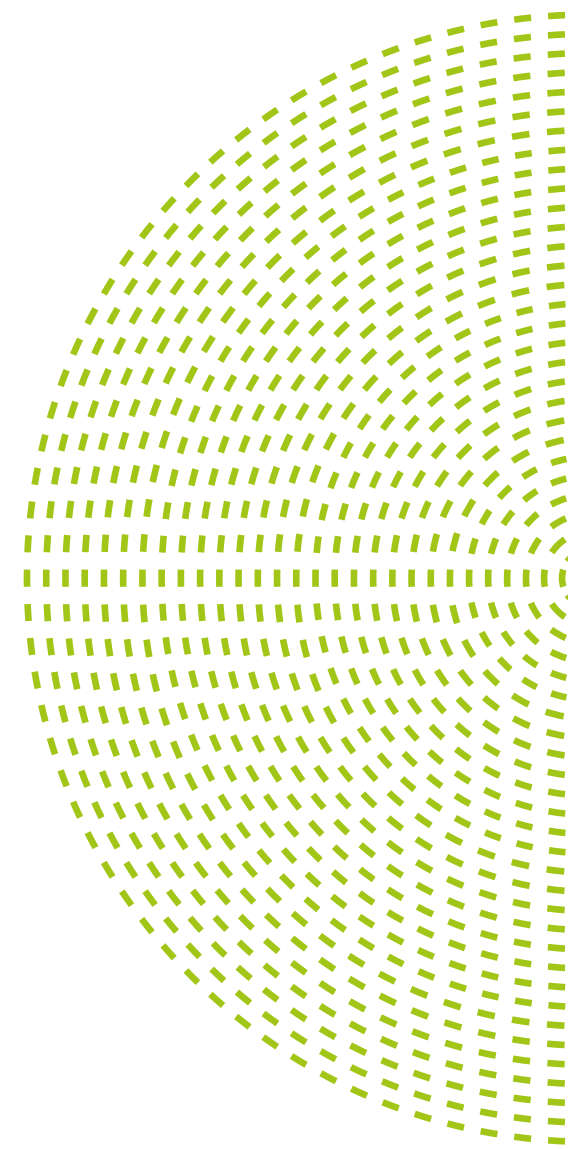
Developing the policy



To develop this policy, preliminary mapping of the potential negative impacts of Group activities on human rights was conducted in collaboration with the company's concerned internal actors. This allowed us to identify the impacts right by right, per affected stakeholder, per type of impact (direct and indirect), and according to the various businesses. The potential negative impacts of the company's activities were identified by right, company activity, type of impact (direct, indirect), and potentially impacted stakeholder. In parallel with mapping, a risk analysis was conducted per country.

Based on this work, the negative impacts were assessed according to severity. This allowed us to define the Group's salient human rights issues (see specific commitments of this Policy).

Impact mapping and this Policy were submitted to a panel of external stakeholders for a consultation and discussed by staff representative bodies within the European Works Council.





SUEZ human rights commitments 1/4



1 | The Group undertakes to respect internationally recognized human rights within the framework of all its business activities and everywhere it operates.

Internationally recognized rights are those rights protected by international human rights protection treaties, in particular the International Charter of Human Rights¹ and the International Labour Organization's Fundamental Conventions.

International standards represent the minimum standards the Group will comply with in all countries where it does business.

In the event of conflict between international standards and national law, the Group will strive to find solutions that respect the spirit of the international standards, without infringing national laws.

1. The term "International Charter of Human Rights" refers to the following United Nations instruments: the Universal Declaration of Human Rights of 1948, the International Covenant on Civil and Political Rights of 1966, and the International Covenant on Economic, Social and Cultural Rights of 1966.



SUEZ human rights commitments 2/4



2 | Given its activities, the Group commits itself more specifically to:

Respecting and promoting the right to water and sanitation

The Group undertakes to respect and promote the right to water and sanitation as defined by the United Nations and to contribute to the sustainable development objectives within the framework of its activities.

Respecting the rights of its employees, in accordance with ILO international standards relative to:

- Prohibition of forced labour
- Abolition of child labour
- Trade union freedom and the right to collective bargaining
- Non-discrimination
- Health/safety conditions at the workplace
- Length of workday

It rejects all forms of violence and harassment at the workplace and guarantees respect for its employees' individual freedoms and private life at the workplace.

.../...



SUEZ human rights commitments 3/4



2 | Given its activities, the Group commits itself more specifically to:

Not jeopardize the living conditions of the local communities around its sites, in particular respecting their:

- Right to health
- Right to a healthy environment
- Right to an adequate standard of living
- Right of ownership

The Group is particularly diligent regarding compliance with international standards in case of population displacements.

It also ensures that the security forces in charge of providing for the safety of its employees or property respect human rights within the framework of their mission.

Not infringe the rights of its customers, in particular their health

Protect private data to which the Group may have access within the framework of its activities

Pay special care to the rights of vulnerable persons (workers, communities, customers, etc.)



SUEZ human rights commitments 4/4



3 | The Group undertakes to promote and set up processes to collect human rights claims linked to these activities, and to investigate such claims with openness, impartiality, and in good faith.

4 | The Group undertakes to be vigilant regarding respect for human rights by its business partners when they act through common business relations.

The Group takes due diligence measures aimed at the identification of risks and at the prevention of serious infringements of human rights and fundamental freedoms, of environment, of health and

safety of persons, resulting from its activities, as well as from the activities carried out by suppliers and subcontractors in the framework of their business relations with the Group.



Common action guidelines for application of policy



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The purpose of this Policy is to set up a due diligence process whose primary objective is to prevent negative impacts of the company's activities on any person's human rights.

Given the specificity of human rights, and to make this global process effective, the following action guidelines must inform all measures and processes for operational implementation of the Group's Policy:

- Analyse company decisions and actions as early as possible according to their potential impacts on human rights (of

company employees, supplier or subcontractor employees, local communities, etc).

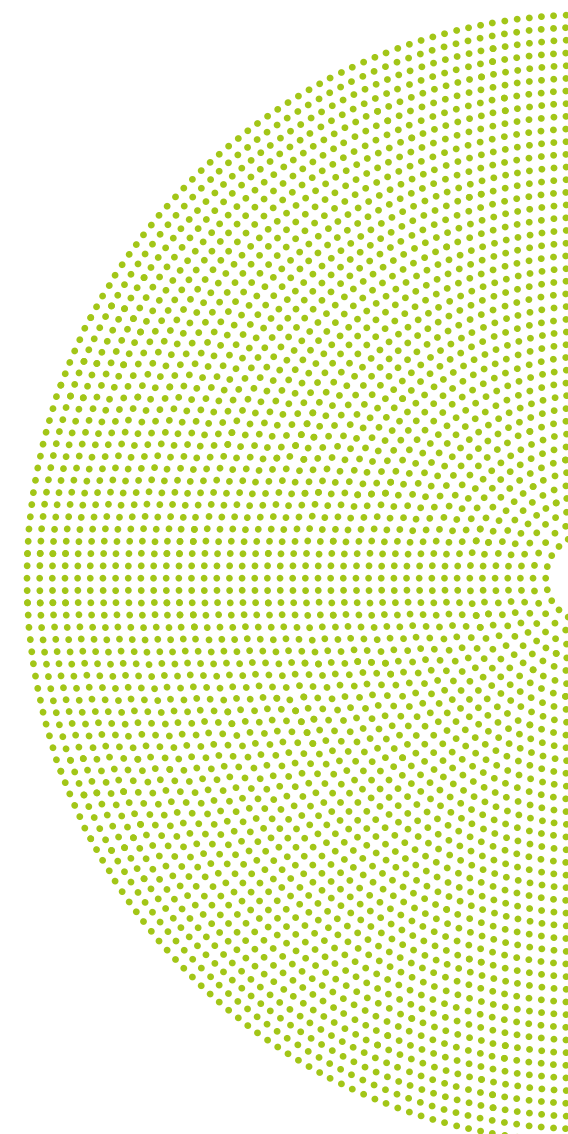
- Take perspectives and expectations of stakeholders potentially affected by Group activities into account.
- Verify whether, among those persons potentially impacted by a company decision, there are so-called vulnerable persons, and in this case adapt the decision accordingly.
- Offer potentially affected stakeholders the means to refer all matters or claims to the company

concerning its activities, and properly process all human rights alerts or claims.

- Regularly assess the company's actions for managing human rights.



Policy implementation by corporate divisions



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The Group's commitments under the present human rights policy fall into global policies or already existing processes. It is up to each corporate division to verify and ensure the overall consistency and effectiveness.

If an identified salient issue is within its scope of activity, the corporate division must decide on the best way to deal with the issue: draw up a new policy, incorporate new elements into existing processes, etc.



Policy implementation by BUs



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Given that the risk of negative impacts on human rights is closely tied to the activities, operational contexts, countries, or business partners, each BU/Global Business Line is expected to develop its own due diligence process in order to:

- Create its own mapping of potential negative impacts in its scope of activity (including subsidiaries and business partners) based on the impact mapping conducted at Group level.

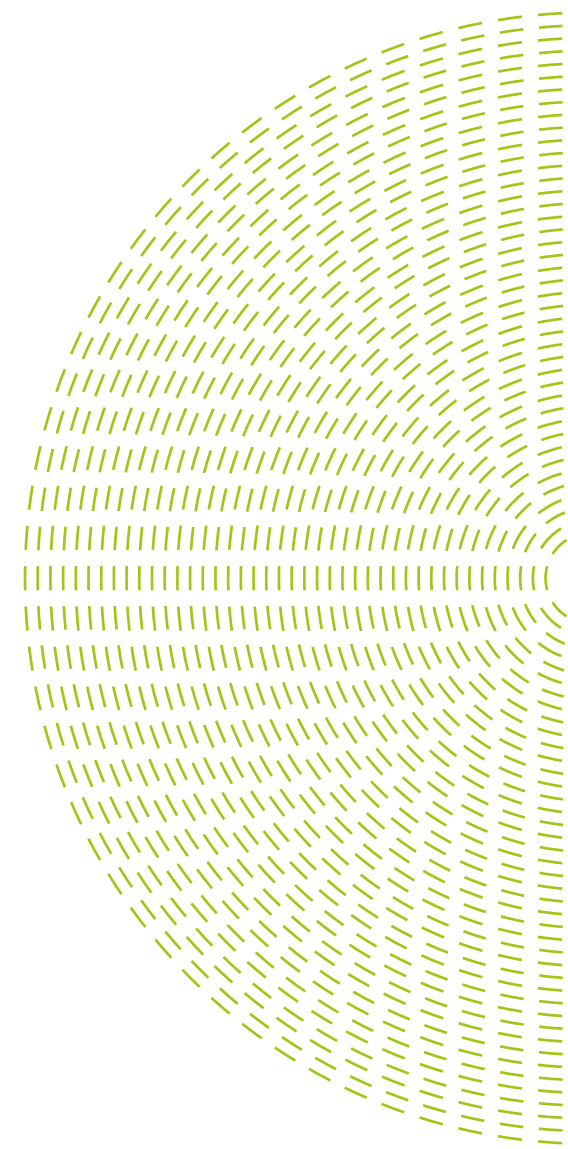
- Define action plans to control these potential negative impacts through a continuous improvement programme (actions, objectives, monitoring).
- Set up risk analysis processes linked to its new business activities.
- Regularly review impact mapping and related action plans via the Group's integrated risk management system (ERM process).

- Annually report to the Sustainable Development Division on actions implemented to apply this policy.

For operational implementation, the BU will base itself on the action guidelines mentioned above. In particular, it will ensure that stakeholders potentially impacted by its activities are aware of the means to refer all claims concerning its activities to the Group.



Claims procedure



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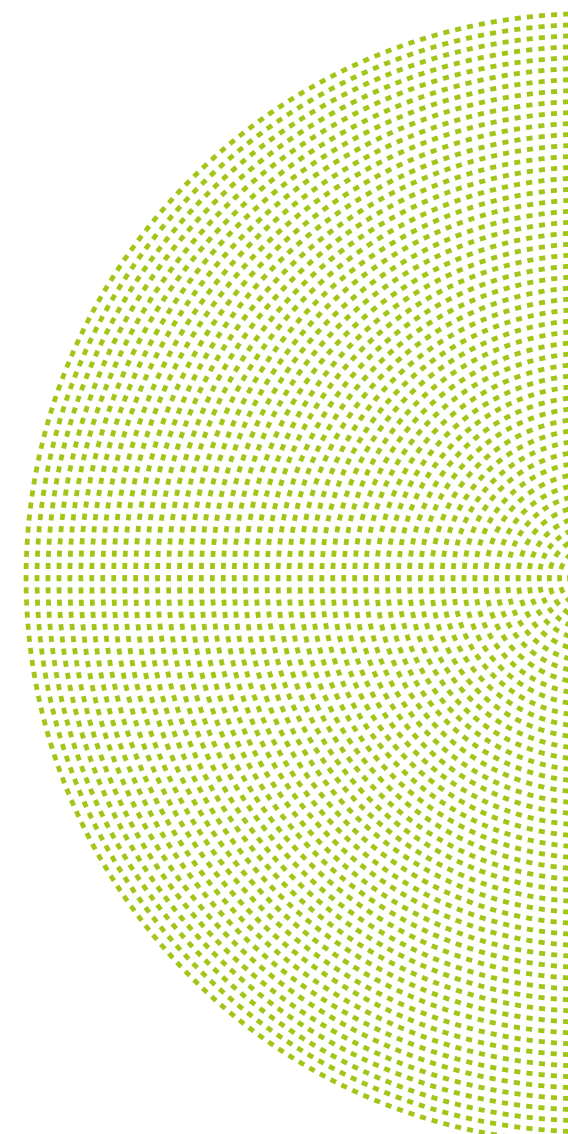
Governance

Firstly, the email address **ethics@suez.com**, which can be found in the Ethics section of the SUEZ website, allows any stakeholder to address any question, request for information or alert to be escalated directly to the Group's Ethics Officer and the Ethics and Compliance Director, who will analyze the information once it has been received and process it by implementing the most appropriate internal procedures.

Secondly, if they become aware of a potential breach of the ethical principles, the Group's employees are encouraged to discuss it with their line manager, other appropriate managers (Human Resources, Safety, Legal, etc.), an employee representative, the Ethics Officer of their entity, or the Group's Ethics Officer. Any discussions in this context will remain confidential and no penalty may be applied to any employees who, in good faith, takes the initiative to share their concerns on matters of ethics or compliance.



Policy supervision and application



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The General Secretariat and the Group's Sustainable Development Division are in charge of jointly overseeing this human rights Policy, and in particular are in charge of:

- Developing and updating regularly the global mapping of potential negative impacts, and informing the other company players of all new risks or issues tied to their activities.
- Supporting the BUs and other corporate divisions in the operational implementation of the Policy.

- Monitoring this operational implementation and reporting on the application of this Policy.
- Raising Policy awareness inside and outside the company.

At the operational level, the risk officers are in charge of the local impact mapping annual review. Each identified risk owner is responsible for ensuring the Policy is properly applied.



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The Policy is monitored by a steering committee made up of the following internal divisions:

- Ethics and Compliance
- Internal Audit and Transformation
- Human Resources
- Purchasing
- Information systems
- Legal
- Health & Safety
- Sustainable Development
- Risks
- Business Units

It is supported by the Executive Committee (CODIR): General Secretary, Human Resources Director and Communication and Sustainable Development Director.

The results of the human rights policy implementation are:

- Presented to the CSR, innovation, ethics, water and sustainable planet Committee of the Board of Directors, annually.
- Presented to the Executive Committee, twice a year.

- Presented to the staff representative bodies within the European Works Council, every two years.
- Published each year into the reference document and also into the Group performance report, to information and dialogue with stakeholders.