

Code of ethics SUEZ

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Editorial



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Very few companies are capable of preserving and developing assets that are critical to people's health, community prosperity, sovereignty within territories and the ecological transition. SUEZ is one of them.

At SUEZ, we tackle these critical issues head-on – which are reshaping society as we know it.

Against this ever-shifting backdrop, our Group reaffirms its deep conviction that sustainable performance cannot exist without flawless conduct centered on ethics, trust, and transparency. It not only serves as a moral obligation, but also a competitive advantage for our Group.

Our Code of Ethics is a key component of our overall governance model. It acts as a benchmark for all Group employees across our operating locations and for all departments.

It establishes the key principles that should inform every single Group stakeholder's decision-making and their conduct. To this end, day in, day out, every individual action will reflect this collective effort in terms of commitment, openness and a culture driven by results.

Introduction

In a world faced with climate change, geopolitical tensions and fast-changing societal expectations, the pressure is mounting for humanity and local communities. The same can be said for the planet as a whole.

AGAINST THIS BACKGROUND, AND BUILDING ON ITS 160-YEAR LEGACY, SUEZ IS DELIVERING IMPACTFUL SOLUTIONS TO:

Ensure safe access to essential services that guarantee health and hygiene for populations..

Act as a catalyst to drive development and sovereignty across territories by helping to create the conditions that boost local economic appeal as well as strengthen resilience and autonomy within territories, particularly through local sources (recycling, energy production).

Safeguard the planet by conserving resources within planetary boundaries, protecting biodiversity, and actively combating climate change.

WITH THIS IN MIND, HELPING TO BUILD A BETTER FUTURE FOR ONE AND ALL FORMS THE CORNERSTONE OF SUEZ'S STRATEGY, THROUGH THE COLLECTIVE EFFORTS OF ITS MEN AND WOMEN EMPLOYEES
(hereafter the "Employees"), partners and customers.

This strategy is manifested in action to promote an inclusive, tolerant workplace and implementing practical solutions to achieve the ecological transition, while reconciling social, economic and environmental challenges. This requires regular dialogue, particularly with local communities, associations and nonprofits, NGOs, economic players, institutions and many more stakeholders.

SUEZ has all the keys to succeed: Employees committed to the cause – day in, day out – leveraging their expertise to provide essential services; the trust of customers and partners alike, with whom SUEZ develops personalized solutions; and a wealth of projects which, across the globe and throughout the Group's history, have shaped the breadth of its expertise.

In all its operating locations, SUEZ is mindful of its mission-critical activities – performing to the highest standards required of its technical businesses and ethical principles.

This Code of Ethics (hereafter "the Code") establishes a shared framework informing every single decision, action and relationship within SUEZ, as well as its dealings with its ecosystem.



IT IS STRUCTURED INTO TWO PRIORITY AREAS:

SUEZ'S COMMITMENT TO ETHICS;	SUEZ'S APPROACH TO ETHICS WITH ITS CUSTOMERS, SUPPIERS, SUB-CONTRACTORS, PARTNERS AND INSTITUTIONAL PLAYERS (HEREAFTER "STAKEHOLDERS").

Adherence to the Code by the Group's Employees – irrespective of their position and level of responsibility – is absolutely vital when it comes to taking any decision or action. Furthermore, SUEZ expects its Stakeholders to adhere to the highest standards regarding compliance with the Code, or at least to an equivalent standard.

SCOPE

The Code applies to all Employees and companies within the SUEZ Group1 and other structures controlled by the latter2. As regards companies and structures not controlled by the SUEZ Group, the representatives of the SUEZ Group or its subsidiary within these companies or structures shall endeavor to uphold this Code.

[1] Group companies denotes the following: SUEZ S.A. and all its subsidiaries; a subsidiary being a company in which SUEZ S.A. holds the majority of voting rights, whether directly or indirectly.
[2] Structure Controlled by the Group denotes: any form of grouping other than a company formed in association with third parties and controlled by a Group company (including joint ventures, economic interest groupings ("EIGs"), partnerships, etc.).

1. Value system

To meet growing, urgent challenges such as climate change and pollution, SUEZ undertakes to support its customers and communities across the entire water and waste value chain.

HEALTH & SAFETY

OPENNESS

TEAM SPIRIT

COMMITMENT

RESULTS-FIRST CULTURE

HUMILITY

These core values are reflected in SUEZ's day-to-day commitment ethical practices.

2. SUEZ's commitments to ethics

Wherever it operates, SUEZ enforces compliance with the laws and regulations in force.

Every Employee, regardless of their position and level of responsibility, is required to comply with applicable legal and regulatory provisions, to act with integrity and loyalty, and to report any situation that may be defined as a breach.

A. COMPETITION LAW AND PERSONAL DATA PROTECTION

Competition law

Irrespective of its operating country, the Group is committed to enforcing competition rules.
To that end, in dealing with their partners, customers, sales leads and suppliers, Group Employees must demonstrate exemplary conduct. As such, they must:

> **Honor the principles of fair and honest competition.** This includes refraining from pernicious practices such as cartels; and

> **Maintain confidential Group-specific information,** notably commercially sensitive data.

Personal data protection

SUEZ is committed to the responsible use of the personal data entrusted by complying with its contractual obligations and ensuring the secure development of its products and services. Since the disclosure of personal data – even where unintentional – can have serious ramifications, every Employee must exercise caution.

All SUEZ Employees and users of the information system must use the provided IT tools, software solutions, and mobile devices responsibly, in accordance with the principles of security, confidentiality, and data integrity.

B. HEALTH & SAFETY

Employees are the Group's greatest asset.
SUEZ makes it a priority to oversee their safety, health, well-being, and professional development.
Guaranteeing safety involves assessing risks, promoting a Safety culture, delivering the necessary training, and providing relevant equipment under all circumstances. As part of the "Speak Up and Stop" culture championed by the Group, every Employee who determines a dangerous scenario must report it.

In this context, SUEZ introduced a scheme designed to prevent accidents at work. The Group's health, safety, and environmental target is "Zero serious accidents." Regular audits, performance reviews and management training all serve drive this target, which is shared with SUEZ's Stakeholders. Constant dissemination of the lessons learned from accidents and best practices makes this approach more impactful.



C. RESPECT FOR HUMAN RIGHTS

SUEZ undertakes to uphold the following guiding principles:

> Strict observation of basic human rights;

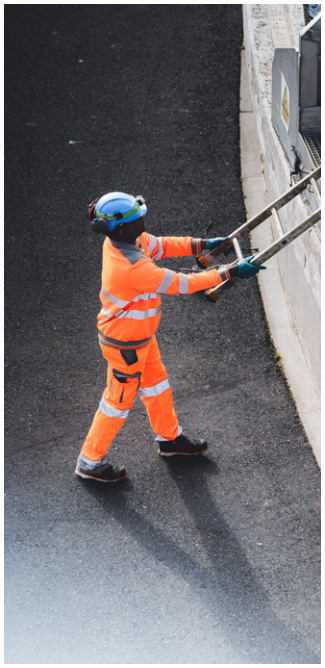
> Zero tolerance of any breach;

> Adjustment of measures to local contexts while preserving a strong, shared foundation.

Consistent with its applicable policy which can be viewed on its corporate website, and in the Group's active locations, SUEZ notably:

> deplores and prohibits the use of all forms of forced labor;

> refrains from child labor practices that do not comply with local laws addressing the minimum working age and ILO Convention 138 (Minimum Age Convention, 1973).



D. EQUAL OPPORTUNITIES AND NON-DISCRIMINATION

SUEZ guarantees equal opportunities and prohibits any form of discrimination, whether direct or indirect, particularly targeted at origin, gender, age, disability, sexual orientation, beliefs, or any other personal circumstance.
Decisions regarding recruitment, professional development, and compensation are based on skills, performance, and potential, pursuant to the law and the Group's values.

E. UPSKILLING

SUEZ is committed to recognizing, upskilling and championing the skill sets of each of its employees – both fairly and candidly. SUEZ promotes continuous learning, knowledge transfer, and a career path, reflecting the needs of the Group and individual aspirations. **. Decisions regarding skill sets are based on objective criteria, with acknowledgement of equal opportunities and diversity.**

F. SOCIAL DIALOGUE

SUEZ undertakes to foster social dialogue founded on mutual respect, active listening and complete transparency. **It recognizes Employee representatives as legitimate partners and prioritizes fair and regular communications.**

G. ETHICS AND COMPLIANCE

Zero tolerance for corruption

SUEZ regards integrity as one of its guiding ethical principles, condemning corruption in all its forms. Across the board, SUEZ applies a zero-tolerance policy on corruption. When carrying out their duties, all Employees must practice SUEZ's principles and values. In each Business Unit ("BU"), an Ethics & Compliance Officer (hereafter "ECO") is appointed to ensure that this Code is enforced within the scope of their BU. Backed by a network of Ethics & Compliance Correspondents ("ECCs"), the ECO helps prevent ethics- and corruption-related risks by promoting practices that illustrate the Group's commitments.

Prevention and management of conflicts of interest

To oversee complete transparency in all its activities, SUEZ has devised a system to prevent and manage conflicts of interest. Employees are asked to report any potential or actual conflicts of interest so that they can be dealt with collectively by implementing measures to protect the Employee and the Group – as and where appropriate. This approach furthers SUEZ's commitment to sustaining high ethical standards and preserving the integrity of its activities.

Alert system

SUEZ champions a "Speak Up" culture, supporting its Employees and Stakeholders in reporting any act or situation that contravenes its Code. The alert system is open to all Employees, as well as third parties, **via the address ethics@suez.com.** It guarantees the confidentiality of communications and the absence of retaliation or discrimination against whistleblowers acting in good faith and selflessly.

H. SUSTAINABLE DEVELOPMENT

Strengthening and expanding the natural contribution of SUEZ's activities

Sustainable development is central to SUEZ's business and is one of the pillars of its integrated performance (financial, environmental, and social). The Group's Sustainability Strategy seeks to enhance the positive impact of its businesses, whether in terms of climate, the protection of biodiversity and natural environments, Stakeholder engagement and its contribution to fostering local prosperity.
Exercising caution with regard to the emissions and impacts of its activities, SUEZ also strives to share its environmental targets with its partners, suppliers, and the owners of the facilities it manages.
SUEZ is a socially responsible company that is steadfastly committed to the communities where it conducts its business. Respectful of the environment and cultures, the Group has made it its mission to safeguard the resources essential to the development of human activities and our future.

Against this background, SUEZ is taking action to preserve water, raw materials, and biodiversity. Every initiative to improve waste sorting, conserve water, and support vulnerable populations helps to drive this ambition.

Continuous innovation to favor sustainable development

As an industrial player, SUEZ commits to continuously improving its health and safety protocols while reducing the environmental impact of its activities, as it strives to create new sustainable solutions. To sustain and enhance our expertise, SUEZ develops a working environment where discipline, curiosity, and continuous improvement are encouraged.

Innovation is a key growth driver, serving to anticipate environmental challenges, optimize processes, enhance energy performance and lessen the impact of SUEZ's business activities.

3. Ethics with its Stakeholders

A. CUSTOMERS



SUEZ interacts with thousands of private individuals, businesses, local authorities, and governments the world over. Together, they form the basis of its commercial relationships. To rise to the challenges faced by its customers and to honor its commitments to ethics and compliance, the Group draws on its experience and expertise to design and implement innovative solutions for their benefit.

All the Group's customer-facing Employees must conduct themselves with transparency and integrity. SUEZ expects its customers to act in accordance with these very principles.

B. SUPPLIERS AND SUBCONTRACTORS

Specifically, the quality of the products and services provided by SUEZ depends on the quality of its suppliers and subcontractors. As a result, vetting of the latter must be impartial and be tied to objective criteria.

To that end, prior to entering into any contract, SUEZ also assesses its suppliers and subcontractors from an ethics and compliance standpoint.

Under its continuous improvement process, SUEZ expects its suppliers and subcontractors to comply with applicable rules on safety, preventing corruption, and responsibly managing the environmental impact of their business activities.

Wherever possible, SUEZ promotes respect for human rights among its suppliers and subcontractors.

C. PHILANTHROPY AND SPONSORSHIP

Aligning with its sustainable development roadmap and social commitments, the Group leads philanthropic and sponsorship initiatives, adopting the following approach:

- **As regards philanthropy,** to support non-profit initiatives in the public interest serving to combat social exclusion and preserve the environment in areas such as biodiversity protection.
- **To drive sponsorship,** demonstrating SUEZ's economic, social and environmental commitment by helping to form deeper relationships with all Stakeholders, with a view to boosting regional development and promoting these areas.

D. INSTITUTIONAL STAKEHOLDERS (LOBBYING)

SUEZ may be enlisted to clarify the impact and practical implications of legislation, regulations and public policies under consideration and discussion – whether at the local, national, European or international level.
SUEZ is also positioned to defend the Group's interests while fully safeguarding public interests.
At the broader level, SUEZ can convey various business, sector-specific messaging to institutions, professional federations, associations and nonprofits, and public organizations, particularly during institutional events and seminars.

When conducting all such activities, SUEZ complies with the regulations in force, upholding the principles of ethics and ensuring complete transparency.



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