

# HUMAN RIGHTS POLICY





Faced with growing environmental challenges, each day, for more than 160 years, we have been acting in support of our clients and partners to deliver essential services that protect and improve the quality of life wherever we operate.

Our purpose, adopted in September 2022, underlines our commitment to people and planet.

Because we manage common goods, in sometimes tense economic and political contexts, relying on tens of thousands of suppliers and subcontractors, we may be confronted with situations involving the protection of human rights.

As a major company with a worldwide presence, SUEZ is vigilant in its respect for human rights, by and towards its employees and business partners. Beyond its due **diligence efforts**, SUEZ intends to promote equal opportunities and inclusion, and to play a leading role in the effective implementation of the right to water, on behalf of its customers. SUEZ **Sustainable Development roadmap** details our social and environmental commitments.

Convinced that an ethical culture contributes to the longterm growth and sustainability of our company, we have set up a specific policy to share our commitments, reference texts and governance framework with all our stakeholders, so that everyone can play their part in protecting basic rights.



# SCOPE AND REFERENCE TEXTS

The rights protected by international human rights treaties, as well as the international standards of major international organizations, constitute for the Group the minimum standards to be respected in all the countries in which it operates. More specifically, SUEZ refers to the following texts and reference frameworks:

1. The **Universal Declaration of Human Rights** and Additional Covenants;
2. **Conventions of the International Labour Organization (ILO)**, in particular with regard to the non-use of forced labour (Conventions no. 29 and 105), child labour (Conventions no. 138 and 182), discrimination (Conventions no. 100 and 111), and the protection of the right to organise and collective bargaining (Conventions no. 87 and 98);
3. The **Charter of Fundamental Rights of the European Union**;
4. **the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises**;
5. The **United Nations Guiding Principles on Business and Human Rights United Nations**;
6. The **United Nations Convention against Corruption**;
7. The **French law on the duty of vigilance** and **similar laws**, in particular those on the **fight against modern slavery** in the United Kingdom and Australia;
8. The Group's purpose adopted in September 2022, and its Ethics Charter, updated in 2022: the commitments voluntarily made by SUEZ as part of its Ethics Charter, its **Sustainable Development roadmap**, its adherence to the 10 principles of the **United Nations Global Compact**, and the **OECD Principles on water governance**.
9. The **International Finance Corporation's** sustainability standards, which apply directly to many SUEZ projects.

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

This policy applies to all SUEZ activities and its subsidiaries included in its scope of consolidation.

The principles of this policy are promoted by Group employees who sit on the boards of directors or supervisory boards of companies in which SUEZ holds a stake. They also apply to SUEZ's subcontractors and suppliers, in accordance with the ethics and sustainability clauses included in their contracts.

The Group ensures compliance with these principles as part of its monitoring system, and reports annually in its Extra-Financial Performance Statement (DPEF in French).

# GOVERNANCE

**The Group's Sustainable Development and Legal Departments** are responsible for co-steering the human rights policy and, in particular:

- Establish and regularly update a global mapping of potential negative impacts and inform other Group stakeholders of any new risks or issues related to their activities;
- Ensure the existence and deployment of an appropriate control framework;
- Monitor this operational implementation and report on application of this Policy;
- Promote it inside and outside the Group.

At operational level, risk officers are responsible for the annual review of local impact mapping. Each department responsible for the various risks identified is responsible for ensuring that the Policy is properly applied.

SUEZ Vigilance Plan covers the entire Group. It brings together key information on the risks and mitigation procedures that the Group implements to protect its employees, business partners, host communities and the environment. The plan reflects a continuous improvement approach within the Group and with its partners. To facilitate access for stakeholders, a dedicated document is available at the following Internet address:

## Éthique et vigilance



Defined in accordance with article L. 233 of the French Commercial Code and in line with the United Nations Guiding Principles on Business and Human Rights, this plan presents:

- The characteristics and organization of SUEZ in the exercise of its duty of vigilance;
- The method for assessing and mapping risks of serious violations of human rights and fundamental freedoms, human health and safety, and the environment;
- Key risk mitigation and prevention actions;
- Monitoring and results indicators.

The results of the implementation of the Human Rights policy are:

- Discussed annually by the Executive Committee;
- Presented annually to the CSR Committee of the Board of Directors;
- Presented to the social partners, within the framework of the European Works Council, every two years;
- Published each year in the Group's Extra-Financial Performance Statement, for information and dialogue with stakeholders;



# COMMITMENTS TO OUR EMPLOYEES

SUEZ condemns and refrains from all forms of labour that contravene Principle 4 of the United Nations Global Compact and International Labour Organisation (ILO) Conventions 29 and 105 on **forced labour**. In this context, the Group pays particular attention to migrant workers, who are potentially the most vulnerable. In accordance with Principle 5 of the United Nations Global Compact, as well as ILO Conventions 138 and 182 on the minimum age for employment, the Group refrains from **employing children** below the age at which compulsory schooling ceases in the country concerned.

SUEZ recognizes its employees' **freedom of association**, representation and trade union membership, in accordance with Principle 4 of the United Nations Global Compact and the principles set out in ILO Convention No. 87 of 1948 concerning Freedom of Association and Protection of the Right to Organize. Employees are free to join or not to join a trade union of their choice.

In terms of occupational health and safety, SUEZ monitors the health and working conditions of its employees and ensures their medical care in compliance with local legislation, through a comprehensive Group system: annual contractualization of qualitative and quantitative objectives with the General Managers of each entity, health and safety audits, managerial training and follow-up by the Health and Safety Department through proactive and reactive performance indicators. SUEZ is committed to **non-discrimination** in labour relations, in accordance with ILO Convention No. 111 and Principle 6 of the United Nations Global Compact.

In countries where there is no statutory minimum wage, SUEZ ensures that its employees receive a **decent wage**, in line with the commitments set out in its Sustainable Development roadmap.

The Human Resources department oversees all commitments related to employees.



# COMMITMENTS TOWARDS RESPONSIBLE PURCHASING

SUEZ promotes **respect for human rights within its sphere of influence**, in particular with its suppliers, subcontractors and partners. SUEZ exercises its duty of care to ensure that the objectives of its policy are respected, in accordance with Principles 1 and 2 of the United Nations Global Compact.

When renewing contracts or formalizing new ones, SUEZ includes specific **clauses** on ethics, health and safety, sustainability and data privacy. These clauses, and the associated means of control, are proportional to the risks identified. As part of its Sustainable Development Roadmap, **SUEZ is committed to monitoring 100% of its suppliers presenting a high sustainability risk profile** due to the category of goods or services delivered, the country in which they are produced, or the size of the companies supplying them. **Audits** may be carried out for high-risk categories, particularly in terms of **health and safety**.

In the event of a clear breach of ethical principles or human rights related infringement and of non-cooperation in SUEZ's vigilance efforts, the Group may **terminate** its contractual relations, particularly in cases of forced labour or child labour.



# COMMITMENTS TO LOCAL COMMUNITIES

SUEZ guarantees **the health and safety** of the users of its services, as well as of the residents living near the sites it operates. This safety also involves **data protection** and the **security of SUEZ's information systems** and those of its partners.

SUEZ strives to ensure the **continuity of its services**: the Group's contracts include on-call duty for operating teams. SUEZ develops, tests and regularly updates crisis management plans, including temporary access solutions in the event of prolonged service interruption.

The Group actively contributes to the implementation of the **universal right to water and sanitation** (ODD 6). As part of its Sustainable Development roadmap, SUEZ is committed to systematically mapping the risks (physical, economic or social) of water insecurity for all water distribution contracts\*. The Group also ensures that solidarity mechanisms are available for the most vulnerable users.

SUEZ ensures to respect the **living environment** of local residents near sites where the Group operates, and promotes local dialogue to prevent and reduce any nuisance. For all construction projects, SUEZ carries out social and environmental impact studies, paying particular attention to the most vulnerable populations and indigenous communities. The Group also promotes **equal opportunities** and takes voluntary action to encourage **the inclusion of vulnerable populations**.

*\*for +25 000 inhabitants contracts, with priority given to cities with +25% people considered as vulnerable (e.g. living from social aids in OECD countries or living under the poverty threshold for non-OECD countries).*





# MONITORING, ALERTS AND REMEDIATION

**SUEZ has a Group alert system open to all its stakeholders. The confidentiality and protection of those who use it are guaranteed.**

The e-mail address [ethics@suez.com](mailto:ethics@suez.com), accessible via the «**Ethics**» section of the SUEZ website, enables anyone to send any questions, requests for information or alerts directly to the Group Ethics Officer and the Director of Ethics & Compliance. Information received is analyzed and processed by the most appropriate internal means. This Group system may be supplemented locally by systems offering the same guarantees.

SUEZ employees who have questions about compliance with ethical principles and/or the Group's compliance policy can also share their concerns with their line manager, expert managers (human resources, legal, etc.), the entity or Group Ethics Officer, or employee representatives. Discussions within this framework remain confidential. No sanction will be applied to those who use this approach in good faith.

**SUEZ's Sustainable Development Department** also monitors the media and social media in order to prevent and manage controversies related to its businesses and activities around the world. Social networks are additional channels for direct communication between SUEZ and its stakeholders, who can publicly question the Group on issues that concern them.

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