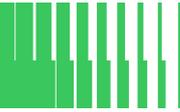


SGP\_SDE\_02

# Human Rights Policy

**SUEZ GROUP**



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## Glossary and abbreviations

### FUNDAMENTAL HUMAN RIGHTS

The rights inherent to all human beings, universal, indivisible and inalienable, as recognized by major international human rights instruments. They include, in particular: equality and non-discrimination; fundamental labor rights (trade union freedoms, abolition of forced labor, elimination of child labor, non-discrimination at work); freedom of association and the right to collective bargaining; and the right to an adequate standard of living (including access to water and sanitation), to health and to housing.

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### DUTY OF VIGILANCE

A legal obligation in France (Law No. 2017-399 of 27 March 2017) requiring the identification, prevention, mitigation and reporting of serious risks to human rights and the environment linked to a company's activities, its subsidiaries and its supply chain; comparable frameworks have been introduced in other countries, notably the United Kingdom and Australia.

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### INTERNATIONAL LABOR ORGANIZATION (ILO)

The ILO is the United Nations specialized agency for labor issues, with a mission to promote rights at work, decent work opportunities, social protection and social dialogue.

## DOCUMENT STATUS

<b>DOMAIN</b>	Sustainable Development	<b>STATUS</b>	<input type="checkbox"/> Draft <input checked="" type="checkbox"/> Validated <input type="checkbox"/> Archived
<b>VERSION</b>	1.0	<b>EXCOM APPROBATION DATE</b>	22/12/2025

<b>WRITERS</b>	Charlotte MIGNE - Sustainable Development SVP
<b>VALIDATOR</b>	Nathalie PIVET - Executive Vice President, Group Chief Finance and Sustainability Officer

<b>CLASSIFICATION</b>	<input checked="" type="checkbox"/> C0. Public <input type="checkbox"/> C1. General <input type="checkbox"/> C2. Confidential <input type="checkbox"/> C3. Highly confidential
<b>ACCESS</b>	<input checked="" type="checkbox"/> SharePoint SGP <input type="checkbox"/> Process'Up <input checked="" type="checkbox"/> SharePoint Domain <input checked="" type="checkbox"/> SUEZ Website <input type="checkbox"/> Other:

## DISSEMINATION

<b>TARGET AUDIENCE</b>	SUEZ group – Group subcontractors, suppliers and partners
<b>DISTRIBUTION CHANNEL</b>	<input type="checkbox"/> Viva Engage <input checked="" type="checkbox"/> Mail <input type="checkbox"/> Webinar <input type="checkbox"/> Other:

## TRACKING CHANGES

VERSION	DATE	DESCRIPTION
1.0	22/12/2025	Creation

# 1. Objectives and scope of application

## 1.1 OBJECTIVES OF THE POLICY

- Guarantee respect for fundamental human rights in all activities and relationships of the SUEZ Group in order to protect the company and its employees.
- Establish and enforce clear rules regarding human rights, including those applicable to suppliers, subcontractors, and local communities.

## 1.2 SCOPE OF APPLICATION

This Policy applies to:

- all **employees, executives, and representatives** of the SUEZ group, regardless of their status or country of operation.
- all **companies within the SUEZ group** and other **entities controlled<sup>1</sup>** by it, in accordance with their own decision-making rules and subject to any applicable local laws and regulations.

With regard to companies and structures not controlled by the Group, representatives of SUEZ or its subsidiary within these companies or structures will endeavor to promote the principles of this Policy.

If local regulations contain one or more provisions that are stricter than this Policy, they will prevail over the latter.

SUEZ expects its direct external stakeholders (suppliers, subcontractors and customers) to comply fully with its Human Rights Policy, or to observe an equivalent or more stringent standard.

The Policy also covers the impacts of the Group and its partners on local communities and on all beneficiaries of the services provided by SUEZ.

# 2. Guiding principles

## 2.1 KEY PRINCIPLES AND COMMITMENTS

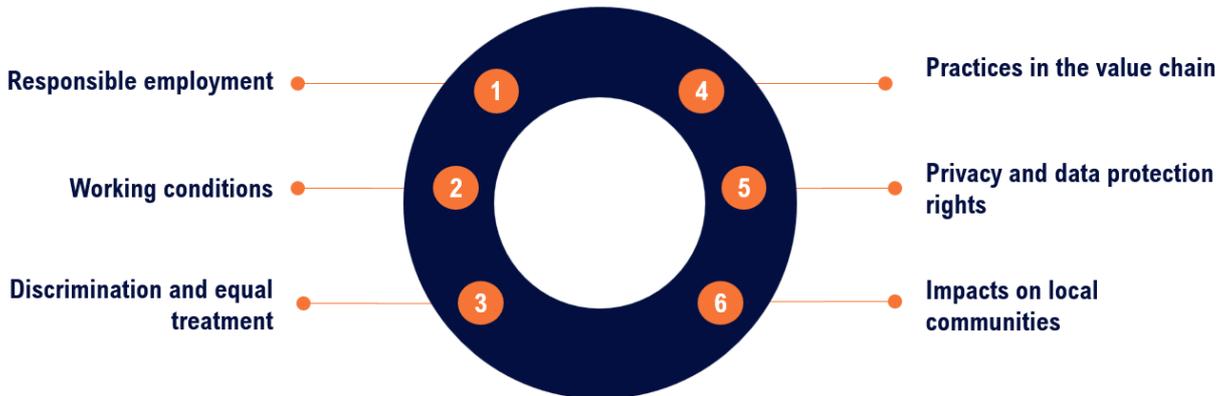
### Key Principles

- Strict respect for fundamental rights, in accordance with international conventions listed in the appendix;
- Zero tolerance in case of violation;
- Adaptation of measures to local contexts while maintaining a strong common foundation.

<sup>1</sup> Controlled entity: any form of group other than a company formed in association with third parties and controlled by an entity of SUEZ (including joint ventures, economic interest groups, partnerships, etc.).

## Commitments

This Policy covers 6 themes representing the Group's key challenges, both in France and internationally, in order to prevent risks of human rights violations.



## Governance

The Group's Sustainable Development department is in charge to manage the Human Rights Policy, specifically:

- Establishing and regularly updating the global risk mapping;
- Monitoring the operational implementation and reporting on the application of this Policy;
- Promoting awareness of the Policy both internally and externally.

The Sustainable Development department is assisted by the Group Legal department to (i) meet the Group's external reporting obligations, (ii) prepare an annual report on any alerts received that may be related to human rights, and (iii) provide any relevant legal analysis regarding these matters.

At the BU level:

- Sustainable Development officers are responsible for the annual review of local risk mapping. Major risks are integrated to the Group ERM (Enterprise Risks Management) system.
- Each department concerned by the identified risks is responsible for ensuring the proper application of the Policy, in particular the Human Resources and Procurement departments.

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

- Discussed twice a year at the Vigilance Committee and annually at the Executive Committee;
- Presented annually to the CSR Committee of the Board of Directors;
- Presented annually to social partners within the framework of the European Works Council;
- Published each year in the sustainability report (CSRD) and the vigilance plan, for information and dialogue with stakeholders;

### Access to Effective Remedy

Reports that may constitute a violation of human rights can be made by any written means, in particular via the **Group's alert system** accessible on the intranet ([ethics@suez.com](mailto:ethics@suez.com)) or on the corporate website SUEZ.com.

The system in place guarantees **confidentiality**, the **protection of whistleblowers**, and the **absence of reprisals or discriminatory measures** against them.

Each alert is processed by the Ethics & Compliance Officers / Ethics & Compliance Correspondents and/or the relevant BU. The information thus collected feeds into the Vigilance Plan and contributes to the continuous improvement of the Human Rights Policy.

## 2.2 RULES AND MINIMUM REQUIREMENTS FOR ALL

The rules described below constitute the **mandatory common foundation for all**.

### 1. RESPONSIBLE EMPLOYMENT

SUEZ commits to banning all forms of forced and illegal labor, as well as the use of child labor, which are practices incompatible with SUEZ values.

The Group therefore imposes on all its entities and partners a set of strict rules to guarantee ethical recruitment practices, complementing the Recruitment Policy.

- Charging recruitment fees to candidates during the recruitment process is strictly prohibited.
- Retaining identity papers or other personal belongings of employees or subcontractors is forbidden.
- Employees must be paid directly, in full, and without illegal deductions.
- Any direct or indirect employee of the Group is free to move and leave their job after giving reasonable notice. No constraint to remain in the position may be imposed.
- Local laws on minimum age and ILO Convention No.138 (which requires establishing a minimum age for admission to employment of no less than 15 years, with the possibility of a derogation to 14 years for certain developing countries) must be respected.
- Dangerous work is strictly prohibited for employees under 18 years old, directly or indirectly employed.
- In case of violation, SUEZ will require immediate protective measures for the victim, will open an independent investigation and propose a remediation plan with immediate effect, especially if a child worker is identified among the Group's employees or subcontractors. Failure to implement the plan or to provide adequate guarantees will lead to contractual sanctions up to and including termination, financial penalties and exclusion from future contracts.

## 2. WORKING CONDITIONS

SUEZ is committed to ensuring a fair and safe working environment. This involves three requirements: adequate income, controlled working hours, and effective safety, in line with the Group HSE Policy and Compensation & Benefits rules. To ensure respect for human dignity, SUEZ defines the following rules:

- National legislations on legal minimum wage must be respected. In the absence of such legislation, the notion of a decent wage shall be defined by HR referents according to the local situation.
- The maximum legal working hours must be respected. SUEZ enforces a maximum of 48 hours per week plus 12 voluntary overtime hours, according to ILO conventions. A minimum of 24 consecutive hours of rest per 7-day period must also be applied.
- Freedom of association and trade union rights, as well as collective bargaining rights, are guaranteed by SUEZ.
- Managerial practices must encourage a "Speak Up" culture.
- SUEZ is committed to ensuring a safe working environment for all its direct and indirect employees.
- SUEZ is committed to ensuring site and personnel security against all forms of malicious acts, in accordance with the Group's Security Policy.
- Access to basic facilities is ensured for all Group employees at their workplace, including access to drinking water and sanitary facilities, and, where working conditions require, access to showers or break/rest areas.

## 3. DISCRIMINATION, EQUAL TREATMENT AND HARASSMENT

The Group's values are based on diverse, inclusive, and protected teams. No decision — recruitment, training, promotion, or dismissal — should be influenced by gender, origin, religion, sexual orientation, disability, age or any other illegal criteria, except where positive discrimination principles are expressly permitted by national legislation. Likewise, SUEZ applies zero tolerance to violence and harassment, whether sexual or moral, in line with the Group's the Group's Recruitment Policy and Inclusion & Diversity Policy. The minimum rules to combat discrimination and harassment, and to promote equal treatment, are as follows:

- SUEZ adopts zero tolerance for any form of discrimination.
- SUEZ adopts zero tolerance for any form of harassment.
- The recruitment process ensures equal opportunities for all candidates, promotes diversity of profiles, and limits bias.

Finally, Group managers should regularly be trained to raise awareness and provide best practices to detect and prevent discrimination and harassment. They encourage a "Speak Up " culture and maintain heightened vigilance.

## 4. PRACTICES IN SUEZ VALUE CHAIN

To ensure that our human rights commitments are truly applied on the ground, they must be shared and implemented by all suppliers, subcontractors, and partners of SUEZ. The objective is to identify major risks upstream, contract clear requirements, then monitor and continuously improve practices throughout the procurement-project cycle. To guarantee best practices within the Group's value chain, SUEZ enforces the following minimum rules and requirements in accordance with the Group's Procurement Policy:

- Supplier risks (forced labor, health and safety, rights and respect for communities, etc.) must be assessed before any engagement.

- A CSR clause covering human rights issues must appear in 100% of the Group's supplier contracts, explicitly requiring respect for ILO standards and forbidding forced labor.
- Suppliers with a high ESG risk profile, as defined by the Procurement and Sustainable Development Departments, must be monitored via targeted evaluations and audits.
- In case of major non-compliance — such as significant violations of fundamental rights (forced labor, child labor, physical violence or harassment), systemic or repeated violations, non-compliance with laws, or failure to meet remediation deadlines — SUEZ reserves the right to apply graduated sanctions, up to and including contract termination.

## 5. RIGHT TO PRIVACY AND DATA PROTECTION

Respecting privacy is an essential component of human rights. SUEZ limits the collection of personal data to the strict minimum, obtains informed consent for any sensitive processing, and secures access to collected information. To this end, SUEZ imposes the following personal data protection rules, in line with the Group's Data Protection Policy:

- Personal data collection must be limited to what is strictly necessary.
- Employees must be informed about the processing of their personal data, and their consent must be obtained.
- Access to employees' personal data must be limited to authorized persons and stored only within secure IT resources approved by the Group's Information Systems Department.
- Data must be anonymized and deleted when no longer in use or at the end of the legally required retention period.

## 6. IMPACT ON LOCAL COMMUNITIES

SUEZ projects may affect ways of life or cause displacement of local populations. Continuous dialogue, respect for customary land rights, and freedom of movement are fundamental principles. To limit the negative impacts of the Group's activities on local communities, SUEZ defines the following fundamental rules:

- A prior Social and Environmental Impact Assessment (SEIA) must be conducted for all construction projects in accordance with applicable regulations or meeting thresholds set by the Group Investment Committee, in order to identify potential effects on local communities.
- SUEZ shall identify and engage communities affected by its projects, establish community liaison groups where significant negative impacts have been identified in the previous assessment appropriate, and ensure access to mediation mechanisms.
- SUEZ guarantees the freedom of movement of local communities.
- SUEZ ensures continuity of service for all users of its services.
- A water vulnerability mapping is carried out for water distribution contracts when the BU assesses that the risk of access to water is significant in the risk assessment exercise.
- SUEZ ensures non-discriminatory access to drinking water distribution services, regardless of gender, origin, religion, sexual orientation, disability, age or any other unlawful criterion, and implements measures for prevention, support and remedy to prevent and address any exclusion.

## 3. Summary of Rules and Behaviors

TITLE: SGP_SDE_02   HUMAN RIGHTS POLICY		VERSION: 1.0	DATE: 22/12/2025
VISA   SIGNATORY: Nathalie Pivet			
<b>RULES</b>			
<b>RESPONSIBLE EMPLOYMENT</b>			
<b>RULE 1</b> Forced or illegal labor	Forced or illegal labor is strictly prohibited for all sites, entities, BUs, and all stakeholders in the Group's value chain (suppliers, subcontractors, clients).		
<b>RULE 2</b> Child labor	Child labor is strictly prohibited for all sites, entities, business units, and all stakeholders in the Group's value chain (suppliers, subcontractors, clients), in accordance with ILO Convention 138.  Dangerous work is prohibited for all employees under the age of 18.		
<b>RULE 3</b> Responsible employment	SUEZ requires all its sites, entities, business units, as well as all actors in its value chain (suppliers, subcontractors, clients) to follow ethical recruitment practices, including: <ul style="list-style-type: none"> <li>• No recruitment fees;</li> <li>• No retention of identity papers;</li> <li>• Payment of wages directly, in full, and without illegal deductions;</li> <li>• Freedom of movement and the right to leave employment after reasonable notice.</li> </ul>		
<b>RULE 4</b> Remediation plans	Non-compliance with SUEZ recruitment practice rules systematically results in the deployment of a remediation and protection plan for the affected employee(s) by the entities, sites, or BUs involved. Sanctions are applied if a breach is identified.		
<b>WORKING CONDITIONS</b>			
<b>RULE 5</b> Fair work	SUEZ guarantees fair working conditions for all its employees. All Group sites and entities must: <ul style="list-style-type: none"> <li>• Comply with national legislation on minimum wage or define the local minimum wage level in the absence of regulation.</li> <li>• Respect the maximum number of working hours allowed by local legislation and limit the maximum working hours to 48 hours plus 12 voluntary overtime hours, in accordance with ILO conventions.</li> </ul>		
<b>RULE 6</b> Appropriate working conditions	All Group sites and entities must ensure access to basic facilities at the employees' workplace.		
<b>RULE 7</b> Employees safety	All Group sites and entities commit to ensuring employee safety. They implement the 10 Life-Saving Rules, consistently provide personal protective equipment (PPE), and train employees in Health and Safety.		
<b>RULE 8</b> Freedom of association	SUEZ guarantees freedom of association, trade union rights, and the right to collective bargaining for all its employees, in accordance with ILO Conventions.		
<b>DISCRIMINATION, HARASSMENT AND EQUAL TREATMENT</b>			
<b>RULE 9</b> Equality in treatment	The recruitment process ensures equal opportunities for all candidates, promotes diversity of profiles, and limits bias.		
<b>ATTITUDE 1</b> Zero tolerance	All Group employees must adopt a zero-tolerance policy towards any form of harassment (moral, sexual) and discrimination.		
<b>ATTITUDE 2</b> Prevention	Group managers promote a "Speak up" culture and are vigilant to prevent situations of discrimination and/or harassment.		
<b>SUPPLIERS AND SUBCONTRACTORS</b>			
<b>RULE 10</b> Supplier assessment	Supplier risks must be assessed prior to any engagement, and a CSR clause covering human rights issues must be included in every contract. Suppliers with a high ESG risk profile must be monitored through targeted evaluations and audits. In the event of major non-compliance, contracts must be suspended or terminated.		

### LOCAL COMMUNITIES

<b>RULE 11</b> Risk assessment	A prior social and environmental impact assessment must be conducted for all construction projects in accordance with applicable regulations or meeting thresholds set by the Group Investment Committee. The populations affected by the projects must be consulted.
<b>RULE 12</b> Local communities' rights	The freedom of movement of local communities and the continuity of the Group's services must be ensured.
<b>RULE 13</b> Equitable access to water	SUEZ guarantees non-discriminatory access to drinking water distribution services and implements prevention, support and remedy measures to prevent and correct any exclusion.

### ATTITUDES

<b>ATTITUDE 1</b> Zero tolerance	Zero tolerance regarding situations of human rights violations.
<b>ATTITUDE 2</b> Exemplarity	Exemplarity of every employee in promoting human rights.

## 4. Appendices

### 4.1 USEFUL LINKS AND DOCUMENTS

- Useful tools for the implementation of this Policy: e-learning, practical guide (to come) communication poster template

### 4.2 STANDARDS AND REGULATIONS

SUEZ refers to the following texts and frameworks:

1. The Universal Declaration of Human Rights and its additional covenants
2. The Conventions of the International Labour Organization, particularly regarding the prohibition of forced labor (Conventions No. 29 and 105), child labor (Conventions No. 138 and 182), discrimination (Conventions No. 100 and 111), as well as the protection of freedom of association and representation (Conventions No. 87 and 98)
3. The Charter of Fundamental Rights of the European Union
4. The OECD Guidelines for Multinational Enterprises
5. The United Nations Guiding Principles on Business and Human Rights
6. The United Nations Convention against Corruption
7. The French Duty of Vigilance law and similar legislation, particularly regarding combating modern slavery in the United Kingdom and Australia
8. The Group's Purpose adopted in September 2022, as well as its updated 2022 Ethics Charter, the voluntary commitments made by SUEZ within the framework 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 environmental and social sustainability standards, which apply directly to many of the Group's projects

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

### 4.3 CONTACTS

To report any situation or ask a question related to this policy:

- Internal to SUEZ: Ethics & Compliance network, manager, or HR or Sustainable Development officer
- External (suppliers, partners, affected communities): [ethics@suez.com](mailto:ethics@suez.com)

### 4.4 DEFINITION AND GOLDEN RULES OF SUEZ GROUP POLICIES

#### DEFINITION OF A GROUP POLICY

Internal guiding principles applicable across the entire SUEZ Group within a specific domain.  
(Specific rules are detailed in application notes.)

#### GOLDEN RULES OF GROUP POLICIES

Internal guiding principles applicable across the entire SUEZ Group within a specific domain.  
(Specific rules are detailed in application notes.)

A Policy:

1. Is owned by the "Domain Owner," who is the signatory. The Domain Owner prepares the Policies relating to their area in collaboration with stakeholders and Internal Control.
2. Is approved by the COMEX (Executive Committee).
3. Is dated, signed, and classified as "confidential" if relevant. The distribution scope is clearly defined.
4. Is reviewed at regular intervals (every 2 years) and upon any change of signatory or modification of rules and principles.
5. Has clear objectives, an explicit scope detailing any exceptions.
6. Is communicated in an organized manner according to the distribution list (general audience, managers, business areas, etc.) and is shared via a single point of access.
7. Includes a summary sheet.
8. There are no local Policies, only local application rules, which are themselves validated by the Domain Owner.