



## THIRD COMMUNICATION ON PROGRESS (COP) – CEO RENEWED COMMITMENT TO THE TEN PRINCIPLES

I am pleased to reaffirm the commitment of EDF Luminus to the ten United Nations Global Compact Principles that we endorsed in 2013. Since then, we have strived to make sure they were embedded in our daily practices, and to inform stakeholders about our progress.

On November 16 2016, we were informed that Ecovadis, a company whose core business is to rate the Corporate Social performance of suppliers, scored us 81/100, which is a significant increase in comparison to our 61/100 score in 2015. We are extremely proud to have reached such a score, which means we're among the top 1% of all companies evaluated by Ecovadis.

In 2015, EDF Luminus invested a record 180 million euro, principally in renewable energy sources and energy services. This represents a remarkable financial effort, but also the success of an entire team, benefitting the environment and the wellbeing of our fellow citizens. Our teams worked very hard to make us the leader in onshore wind energy, with 254 MW installed, and we can rely on a well filled project portfolio to continue our growth. We have also continued to invest in our hydroelectric plants, and continue to help our customers develop their renewable energy production: the wind farms in Tessengerlo, Beringen and Oevel were built in partnership with other companies. Our Dauvister subsidiary has built the largest solar installations in Wallonia, such as at AB In Bev in Jupille. Moreover, we offer our customers solutions to reduce not only their energy consumption and their ecological footprint, but also their invoice. In this way, we are helping our industrial customers to ensure their competitiveness, and our residential customers to retain their purchasing power.

Along with this, we are extremely pleased to report that there were zero Health and Safety Lost Time Incidents in 2015; that is a total of 532 days without accidents on 31 December 2015. There are none recorded so far in 2016.

With our strong commitment to transparency and accountability, we commit to remaining keen participants to the Global Compact and publish our 2016 COP in line with the requested guidelines. This third Communication on Progress (COP) includes, directly or via a reference to our 2015 Sustainable Development report:

- the current statement expressing continued support for the Global Compact Principles,
- a description of the practical actions the company has taken to implement the Principles in each of the four issue areas (human rights, labor, environment, anti-corruption),
- and a measurement of the outcomes.

In 2016, EDF Luminus will continue to pursue its transformation to becoming the number one energy partner, offering progress and comfort to all its customers. We are proud to be able to rely on a great team in order to continue investing to build a sustainable future.

*See signature on specific PDF document*

*Grégoire Dallemagne*

CEO  
On behalf of LMAS sprl



## THIRD COMMUNICATION ON PROGRESS AND SELF-ASSESSMENT REGARDING THE 10 PRINCIPLES OF THE GLOBAL COMPACT November 2016

### GC Advanced COP Self-Assessment

EDF Luminus is reaffirming its commitment to the United Nations Global Compact Principles through publishing our third Communication on Progress for the period of 1 January 2015 until 31 December 2015. The structure of this document follows the latest self-assessment format used by companies pursuing the Global Compact “advanced level”. Using this format will help readers understand that EDF Luminus is now complying with all the criteria needed to reach the “advanced level”.

The report is written with regards to our operations in Belgium. We do not operate in any high-risk and/or conflicted areas. It uses quantitative and qualitative measures to assess the outcomes for 2015 which are further elaborated in our 2015 Sustainability Report. We are pleased that we have fully conformed to the GRI4 Sustainability Reporting Guidelines as a basis of our 2015 CSR Report and we will continue formalizing our reports using this method. The COP is shared internally with the employees and with external stakeholders through the EDF Luminus website.

This COP is not formally reviewed and certified by third-parties. However:

- Most of the information contained in the COP is already published in the EDF Luminus Sustainable Development report, which includes data that is partly assessed by external parties.
- Parts of the SDR are extracts of the Annual Report submitted to the National Bank of Belgium, which is certified by KPMG Company Auditors and Boes & Co Company Auditors. This is especially the case for graphs and figures published on pages 34-37 SDR. It is also the case for the

social balance sheets extracts published on pages 50-51. The Annual report is available on the NBB website which allows third-party checks.

- The GHG emissions inventory presented in the SDR report has been realized by Climact, a recognized consulting firm, in accordance with the GHG Protocol international standard. Some of the emission figures published on page 44 of the report are audited and approved by external firms (VBBV for Flanders and Vincotte for Wallonia).
- Within the framework of article 225 of the Grenelle II law of 12 July 2010 establishing new publication and verification obligations for French listed companies, the EDF statutory auditors verify the consolidated non-financial information presented in the EDF management report. This includes information originating from EDF Luminus, especially social and environmental figures, which are subject to periodic audits. Such an audit, done by EDF Group auditors, will take place in December 2016 and January 2017 about 2016 reporting processes and modifications.
- EDF Luminus is a certified Top Employer since 2013, an HR-oriented label which includes working conditions among its criteria and involves random audits on site.
- We are aware of the impact our activities have on our communities and ensure we work with stakeholders to discuss our CSR reporting. In 2015 and 2016, we received feedback from 88 stakeholders on our 2014 Sustainability Report. They also provided input on the most material topics to be added, which were highlighted in a chart on page 15 of the 2015 Sustainability Report. The structure and content of the 2015 report was modified taking this feedback into account.
- We have asked the company Ecovadis to evaluate 50 detailed questions about our practices and providing supporting documents to substantiate our statements, allowed us to be granted a 81/100 score, i.e. a 30% improvement over the 2015 score (62/100).

Regarding the 17 Sustainable Development Goals, our Sustainability report highlights 4 goals where we have already clearly committed (see page 7 of the 2015 Sustainability report). There are especially commitments regarding Safety, Renewable energy and Sustainable cities.

This COP refers to the 2015 EDF Luminus Sustainable Development Report (SDR) or to other documents/texts already posted on EDF Luminus corporate website with links available. For your convenience, you can find the 2015 report following this link:

[http://edfluminus.edf.com/fichiers/fckeditor/Commun/EDFLuminus/LUMCRE0017-Rapport2015-UK\\_58454\\_web.pdf](http://edfluminus.edf.com/fichiers/fckeditor/Commun/EDFLuminus/LUMCRE0017-Rapport2015-UK_58454_web.pdf)

| <b><i>Implementing the Ten Principles into Strategies &amp; Operations</i></b>                  |  |   |
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| <b>Criteria for GC Advanced Level</b>   | <b>Our Approach</b>  | <b>More information</b>   |
| <p>Criterion 1: The COP describes mainstreaming into corporate functions and business units</p> | <p><i>Place responsibility for execution of sustainability strategy in relevant corporate functions (procurement, government affairs, human resources, legal, etc.) ensuring no function conflicts with company's sustainability commitments and objectives.</i></p> <p>At EDF Luminus, the CSR policy is endorsed by the CEO and is advertised on all sites. The CSR department reports to the Chief Strategy, Innovation and Business Development Officer. The sustainability policy and action plan is therefore reviewed regularly by the executive committee. Departments represented in the CSR Committee include Purchasing, Production, HSE, Marketing, Corporate Affairs, Human Resources, Internal Audit, etc.</p> <p>In 2016, a CSR initiative was launched as part of the Transformation plan of the company. It included 5 tracks, including Safety, Environment (compliance with ISO 50 001 certification), Purchasing, Human resources (Diversity) and reporting (compliance with GRI4 rules). Progress regarding the action plan was monitored at the Executive Committee level.</p> | <p>Pages 8-11 of Sustainable Development Report 2015 (SDR).</p> <p>CSR Policy:<br/> <a href="https://one-edfluminus.edf.com/sites/default/files/Lot%203/EDF%20LUMINUS/ENGAGEMENTS/accueil/csr_edfluminus.pdf">https://one-edfluminus.edf.com/sites/default/files/Lot%203/EDF%20LUMINUS/ENGAGEMENTS/accueil/csr_edfluminus.pdf</a></p> |
| <p>Criterion 2: The COP describes value chain implementation</p>                                | <p><i>Analyze each segment of the value chain carefully, both upstream and downstream, when mapping risks, opportunities and impacts.</i></p> <p>We have identified each segment of the value chain, both upstream and downstream, and published it on Page 13 of 2015 Sustainable Development report.</p> <p><i>Communicate policies and expectations to suppliers and other relevant business partners.</i></p> <p>Our General Purchasing Conditions are sent to suppliers and contractors at the start of each tender and for each contract. Our purchasing conditions include expectations regarding Safety and CSR among extra-financial criteria.</p>  | <p>Pages 12-13 SDR</p> <p>General Purchasing Conditions clauses<br/> <a href="https://edfluminus.edf.com/en/edfluminus/our-commitments/ethics-and-good-governance">https://edfluminus.edf.com/en/edfluminus/our-commitments/ethics-and-good-governance</a></p>  |

### ***Robust Human Rights Management Policies & Procedures***

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses.

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| <p>Criterion 3: The COP describes robust commitments, strategies or policies in the area of human rights</p> | <p><i>Commitment to comply with all applicable laws and respect internationally recognized human rights, wherever the company operates.</i></p> <p>In 2011, EDF Luminus affirmed its respect for human rights by endorsing the EDF Group CSR Agreement. Following this, we adopted our own CSR Policy and updated our Code of Conduct both of which express our support for the Universal Declaration of Human Rights. The Code of Conduct of EDF Luminus is available both on the intranet, to all employees, and on the internet, in French and Dutch.</p> <p><i>Integrated or stand-alone statement of policy expressing commitment to respect and support human rights approved at the most senior level of the company.</i></p> <p>See our CSR Policy and Code of Conduct on EDF Luminus website (Our commitments section).</p> <p><i>Statement of policy stipulating human rights expectations of personnel, business partners and other parties directly linked to operations, products or services.</i></p> <p>Our CSR policy mentions explicitly that we commit to comply with applicable laws. We ensure that our suppliers also respect our values by including a CSR social clause in our General Purchasing conditions.</p> <p><i>Statement of policy publicly available and communicated internally and externally to all personnel, business partners and other relevant parties.</i></p> <p>See our CSR Policy and Code of Conduct which includes all 10 principles of the Global Compact.</p> | <p><a href="http://edfluminus.edf.com/developpement-durable/ethique-292351.html">http://edfluminus.edf.com/developpement-durable/ethique-292351.html</a></p> <p><a href="https://edfluminus.edf.com/nl/edfluminus/onze-engagementen/ethiek-en-goed-bestuur">https://edfluminus.edf.com/nl/edfluminus/onze-engagementen/ethiek-en-goed-bestuur</a></p> <p>See Clause 29.2 of General Purchasing Conditions:</p> <p><a href="https://edfluminus.edf.com/sites/default/files/Lot%203/EDF%20LUMINUS/ENGAGEMENTS/ethique%20et%20gouvernance/social_clause_edfluminus.pdf">https://edfluminus.edf.com/sites/default/files/Lot%203/EDF%20LUMINUS/ENGAGEMENTS/ethique%20et%20gouvernance/social_clause_edfluminus.pdf</a></p> |
| <p>Criterion 4: The COP describes effective management systems to integrate the human rights principles</p>  | <p><i>On-going due diligence process that includes an assessment of actual and potential human rights impacts.</i></p> <p>Since 2014, mandatory reporting to the EDF Group includes a specific document which is to include all significant ethics-related incidents.</p> <p><i>Internal awareness-raising and training on human rights for management and employees.</i></p>  | <p>P. 18 SDR</p> <p><a href="http://edfluminus.edf.com/fichiers/fckeditor/Commun/EDFLuminus/pdf/CodeDeConduite_FR_2">http://edfluminus.edf.com/fichiers/fckeditor/Commun/EDFLuminus/pdf/CodeDeConduite_FR_2</a></p>   |

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|  | <p>In September 2015, as part of the CSR initiative included the Transformation plan, we launched a new e-learning module to help employees understand desired behaviors regarding Ethics and our Code of Conduct. This e-learning includes realistic situations regarding protection of customer data, nepotism, and rules to be applied when using social media (among other ethics-related topics). At the end of 2015, 20% of the employees (186) had volunteered to complete the module. They were 30% end of September 2016.</p> <p><i>Allocation of responsibilities and accountability for addressing human rights impacts.</i></p> <p>Each manager is in charge of making sure human rights are respected and breaches addressed. The EDF Luminus Code of Conduct highlights the role of managers as the first alert level in case of irregularities. The Belgian law also makes it mandatory for companies to appoint “confidential counsellors” in order to prevent psychosocial incidents, especially discrimination or harassment.</p>   | <p><a href="#">0_01.pdf</a></p> |
| <p>Criterion 5: The COP describes effective monitoring and evaluation mechanisms of human rights integration</p> | <p><i>System to monitor the effectiveness of human rights policies and implementation with quantitative and qualitative metrics, including in the supply chain.</i><br/> <i>Monitoring drawn from internal and external feedback, including affected stakeholders.</i></p> <p>Our alert system is advertised in our general purchasing conditions and on internet. Four significant suppliers were evaluated in 2015 from a CSR point of view, via the EDF Group platform (see results in SDR). The suppliers mapping done in 2013 has been updated in 2016 and new evaluations requested.</p> <p><i>Grievance mechanisms that are legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning, and based on engagement and dialogue.</i></p> <p>Alert system at EDF Luminus involves confidentiality counsellors. The Group alert system also allows direct alert to the Group Ethical Committee.</p> <p><i>Outcomes of integration of the human rights principles.</i></p> <p>No formal grievances relating to human rights have been recorded. No alerts were sent to the EDF Group Ethical committee regarding EDF Luminus in 2015 and none so far in 2016.</p> | <p>Pages 18, 20 SDR</p>         |

| <b><i>Robust Labor Management Policies &amp; Procedures</i></b>  |   |  |
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| <p><u>Principle 3</u>: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;</p> <p><u>Principle 4</u>: the elimination of all forms of forced and compulsory labor;</p> <p><u>Principle 5</u>: the effective abolition of child labor; and</p> <p><u>Principle 6</u>: the elimination of discrimination in respect of employment and occupation.</p> |   |  |
| <p>Criterion 6: The COP describes robust commitments, strategies or policies in the area of labor</p>  | <p><i>Reference to principles of relevant international labor standards (ILO Conventions) and other normative international instruments in company policies.</i></p> <p><i>Reflection on the relevance of the labor principles for the company.</i></p> <p><i>Written company policy to obey national labor law, respect principles of the relevant international labor standards in company operations worldwide, and engage in dialogue with representative organization of the workers (international, sectorial, national). Inclusion of reference to the principles contained in the relevant international labor standards in contracts with suppliers and other relevant business partners.</i></p> <p>EDF Luminus supports the principles concerning fundamental rights set out by the International Labour Organisation's - this is mentioned explicitly in the EDF Group CSR agreement endorsed by EDF Luminus in 2011. Freedom to associate, negotiate, and collective bargaining is guaranteed by Belgian law and the specific rules of the Belgian energy sector (FEBEG).</p> <p>In line with our values, we strive to promote diversity and gender equality in our workforce in different ways:</p> <ul style="list-style-type: none"> <li>• Women comprise 41% of our employees, which is exceptionally high in the energy sector. Since 2012, we bring women working in the highest ranks together once a year to identify their concerns in the workplace.</li> <li>• We put together an action plan for employees over the age of 45.</li> <li>• Our workforce included nine different nationalities end of 2015.</li> </ul> <p><i>Structural engagement with a global union, possibly via a Global Framework Agreement</i></p> <p>The EDF Group CSR Agreement has been signed by three Global Unions in 2009. It still applies and updates on progress and best practices are discussed with unions each year.</p> | <p>Pages 50-51, 54-55 SDR</p> <p>EDF Group CSR Agreement:<br/> <a href="http://about-us.edf.com/fichiers/fckeditor/Commun/RH/Publications/Annee/2009/EDF_Accord_RSE09_va.pdf">http://about-us.edf.com/fichiers/fckeditor/Commun/RH/Publications/Annee/2009/EDF_Accord_RSE09_va.pdf</a></p> |
| <p>Criterion 7: The COP describes effective management systems to</p>  | <p><i>Dialogue mechanism with trade unions to regularly discuss and review company progress in addressing labour standards.</i></p>   | <p>Page 50 and 53 SDR</p>  |



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| <p>integrate the labor principles</p>   | <p>All of the EDF Luminus workforce is represented by elected employees who participate in collective bargaining.</p> <p><i>Allocation of responsibilities and accountability within the organization. Grievance mechanisms, communication channels and other procedures (e.g., whistleblower mechanisms) available for workers to report concerns, make suggestions or seek advice, designed and operated in agreement with the representative organization of workers.</i></p> <p>Confidentiality counsellors, whose appointment must be approved by the social partners, play an important preventive and curative role. They can be called upon by simple request, by employees as well as managers, in case of psychosocial difficulties. In April 2014, the Belgian regulation extended the scope of intervention by the confidentiality counsellors: in addition to workplace harassment and violence, stress is now also a motive to ask for their advice. This has led to the creation of a dedicated post for the prevention of psychosocial risks with the Health, Security, Environment department as of April 1st, 2016.</p>   |                        |
| <p>Criterion 8: The COP describes effective monitoring and evaluation mechanisms of labour principles integration</p> | <p><i>System to track and measure performance based on standardized performance metrics.</i></p> <p>The number of cases reported to confidentiality counsellors is part of the yearly Health &amp; Safety report sent to Belgian authorities. See page 53 of our Sustainability report.</p> <p><i>Dialogues with the representative organization of workers to regularly review progress made and jointly identify priorities for the future.</i></p> <p>Dialogue with unions takes place in several instances at EDF Luminus. Among them are monthly works councils and Health and Safety committees.</p> <p><i>Audits or other steps to monitor and improve the working conditions of companies in the supply chain, in line with principles of international labor standards.</i></p> <p>We carry out a risk analysis in the work place. Any incidents are recorded and thoroughly analysed to identify the main causes and similar incidents in the future. We are pleased that these measures have led to zero incidents in 2015.</p> <p><i>Outcome of integration of labor principles.</i></p> <p>Our latest CSR rating by Ecovadis, on November 2016, grants us a 80/100 score regarding labour practices.</p> | <p>Pages 52-53 SDR</p> |

| <b><i>Robust Environmental Management Policies &amp; Procedures</i></b>  |  |  |
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| <p><a href="#">Principle 7</a>: Businesses should support a precautionary approach to environmental challenges;<br/> <a href="#">Principle 8</a>: undertake initiatives to promote greater environmental responsibility; and<br/> <a href="#">Principle 9</a>: encourage the development and diffusion of environmentally friendly technologies.</p> |  |  |
| <p>Criterion 9: The COP describes robust commitments, strategies or policies in the area of environmental stewardship</p>  | <p><i>Written company policy on environmental stewardship.</i></p> <p>Our Health, Safety and Environment policy is available on EDF Luminus website.</p> <p><i>Inclusion of minimum environmental standards in contracts with suppliers and other relevant business partners.</i></p> <p>We have implemented a Health, Safety &amp; Environment policy (last update in 2011), an HSE management system and we are ISO 14001 certified globally, i.e. for all our activities. The Health, Safety and Environment policy and the ISO 14001 certification are advertised on EDF Luminus internet site. Our CSR policy also includes Environment as one of the 5 key topics to be addressed.</p> <p>Our General Purchasing Conditions include a specific clause regarding Environment.</p> <p><i>Specific commitments and goals for specified years.</i></p> <p>EDF Luminus plans to invest 600 million euros in renewable energy and energy services from 2015 to 2018.</p> | <p><a href="http://edfluminus.edf.com/developpement-durable/sante-securite-et-environnement-88507.html">http://edfluminus.edf.com/developpement-durable/sante-securite-et-environnement-88507.html</a></p> <p>Clause 24.2 of General Purchasing Conditions</p> <p>Page 7 SDR</p> |
| <p>Criterion 10: The COP describes effective management systems to integrate the environmental principles</p>  | <p><i>Environmental risk and impact assessments.</i></p> <p>EDF Luminus does integrate environmental risk evaluation in its Health, Safety &amp; Environment risk analysis for all industrial sites. Risks are classified in 4 categories for all production sites. All risks above a certain threshold have to be reduced. Also, impact on environment has to be assessed prior to each new production asset building (as part of the permitting process). This analysis is carried out during the development, with the commissioning, and every 5 years or when there are any changes made to the site.</p> <p><i>Assessments of lifecycle impact of products, ensuring environmentally sound management policies.</i></p>  | <p>Page 38 SDR</p> <p>Page 42-45 SDR</p>   |

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|   | <p>In 2013, EDF Luminus published its global carbon footprint for the first time. It was published again in 2014 and 2015 in our Sustainability report. This allows the company to prioritize actions to reduce the environmental impact of its activities.</p> <p><i>Grievance mechanisms, communication channels and other procedures (e.g. whistleblower mechanisms) for reporting concerns or seeking advice regarding environmental impacts.</i></p> <p>All alert systems (purchasing, ethical) can also be used for environmental impacts.</p> <p><i>Allocation of responsibilities and accountability within the organization.</i></p> <p>Allocation of responsibilities and accountability within the organization is part of the Health, Safety &amp; Environment (HSE) management system. HSE and Production organizations are available to employees via the intranet.</p> <p><i>Internal awareness-raising and training on environmental stewardship for management and employees.</i></p> <p>The HSE department of EDF Luminus prepares weekly messages dedicated to Safety and Environment. These are highlighted each week on the intranet, and at the beginning of each meeting. Specific presentations are also prepared for specific topics and have to be shared every quarter during “toolbox meetings” which are mandatory and tracked.</p> |                            |
| <p>Criterion 11: The COP describes effective monitoring and evaluation mechanisms for environmental stewardship</p> | <p><i>System to track and measure performance based on standardized performance metrics.</i></p> <p>EDF Luminus is ISO 14001 certified globally for all its activities. Compliance checks with the ISO 14000 norm are conducted regularly. Periodic environmental audits are performed by external companies.</p> <p>We measure our total environmental carbon footprint since 2013 following the Greenhouse Gas Protocol (GHG).</p> <p><i>Leadership review of monitoring and improvement results</i></p> <p>This is done at the level of the Executive Committee on a quarterly basis. Detailed review takes place once a year.</p> <p><i>Process to deal with incidents</i></p>   | <p>Pages 38, 42-44 SDR</p> |

The planned actions to reduce risks are reported on a monthly basis in accordance with the methodology of OHSAS 18001.

*Outcomes of integration of the environmental principles*

We have achieved the following in 2015:

- EDF Luminus invested 180 million euros in renewable energy sources and services.
- We have become the market leader in onshore wind energy with a total of 254 MW installed.
- We support our client's efforts to develop renewable energy sources, ie we install windmills on industrial zones, or PV on industrial roofs.
- By end of 2015, 60% of the monthly bills were sent electronically to minimize negative environmental impact.
- From being the first builder of wind turbines in 2014, in 2015 EDF Luminus became the leading producer of onshore wind electricity in Belgium. In one year, its total wind energy capacity rose from 180 MW to 254 MW, an increase of 41%. Sixteen wind turbines were built and another 13 acquired.
- In 2015, permit applications were submitted in Wetteren, Lierneux, Emines, Nives, Couvin, Geel-Laakdal, Munsterbilzen, Courcelles, Beervelde and Dessel, representing a total power capacity of 84 MW.

Environmental incidents have to be reported to the Belgian authorities. The environment management system of EDF Luminus includes a systematic analysis of incidents and a list of corrective actions to be implemented. In September 2015, biodegradable oil (less than 1m3) was discharged into the Meuse, due to a failure to detect a pipe leak in a lubrication system for one of the turbines in the Ampsin hydropower plant.

The global CO2 footprint of EDF Luminus is measured and published each year since 2013. The methodology is constantly updated to take into account the latest GHG protocol changes. We are pleased to report that the average CO2 emissions linked to company cars has continued to decrease.

Our latest CSR rating by Ecovadis, on November 2016, grants us a 90/100 score regarding environmental practices.

***Robust Anti-Corruption Management Policies & Procedures***

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

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| <p>Criterion 12: The COP describes robust commitments, strategies or policies in the area of anti-corruption</p> | <p><i>Publicly stated formal policy of zero-tolerance of corruption.</i></p> <p>The 2011 version of the EDF Luminus Ethical Code of Conduct includes a clear statement by the CEO regarding ethics, values and respect for stakeholders and, in particular, the “fight against fraud and corruption in all its forms”.</p> <p><i>Commitment to be in compliance with all relevant anti-corruption laws, including the implementation of procedures to know the law and monitor changes.</i></p> <p>We monitor law evolution to make sure we are in line with all relevant anti-corruption laws.</p> <p><i>Policy on anti-corruption regarding business partners.</i></p> <p>The Code of Conduct also contains anti-corruption rules regarding business partners. These rules are presented to all new employees who then take our e-learning module for more knowledge of the company policies, including raising awareness on fraud.</p> <p>End of 2013, we became a party to consumer protection laws for the energy industry. We also ensure our clients are protected from cases of fraud, especially regarding door-to-door sales techniques. We have a specific Code of Conduct that all salespersons must abide to.</p> | <p>Pages 18 and 21 SDR</p> |
| <p>Criterion 13: The COP describes effective management systems to integrate the anti-corruption principle</p>   | <p><i>Support by the organization’s leadership for anti-corruption.</i></p> <p>This is included in the Code of Conduct.</p> <p><i>Carrying out risk assessment of potential areas of corruption.</i></p> <p>Four suppliers were evaluated by Afnor in 2015. No potential area of corruption was identified through these evaluations.</p> <p><i>Management responsibility and accountability for implementation of the anti-corruption commitment or policy.</i></p> <p>Management is indeed accountable for implementing the anti-corruption policy. The fraud policy is accessible to all employees on the company’s intranet.</p>   | <p>Page 20 SDR</p>         |

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|  | <p><i>Human Resources procedures supporting the anti-corruption commitment or policy, including communication to and training for all employees.</i></p> <p>Human Resources procedures supporting anti-corruption policy include the company rules &amp; Code of Conduct. In order to help employees with following the rules, we created an e-learning module which is mandatory for all new employees, and warmly recommended to all. This module includes practical situations involving nepotism, conversations with competitors, IT security, etc.</p> <p><i>Internal checks and balances to ensure consistency with the anti-corruption.</i></p> <p>We update regularly our DOA (Delegation of authorities) documents to make sure they are in line with the latest organizational changes. Purchasing rules are embedded in the IT system and cannot be overruled – purchasing orders issued without the involvement of Purchasing are blocked.</p> <p><i>Internal accounting and auditing procedures related to anticorruption.</i></p> <p>Our external auditor KPMG Réviseurs d'entreprises includes internal control processes in the annual accounts certification process.<br/>Internal controls occur regularly, performed by the Audit department. There is also an overall annual risk assessment, which regularly includes fraud &amp; corruption topics.</p> <p><i>Communications (whistleblowing) channels and follow-up mechanisms for reporting concerns or seeking advice.</i></p> <p>Suppliers can use a specific mailbox (<a href="mailto:ethics@edfluminus.be">ethics@edfluminus.be</a>) to report non-ethical conduct relating to current or future contracts, which is published on the corporate web site. Also, EDF Luminus has an anti-fraud plan with a specific alert system which warrants the anonymity of whistle blowers.</p> |                    |
| <p>Criterion 14: The COP describes effective monitoring and evaluation mechanisms for the integration of anti-corruption</p> | <p><i>Leadership review of monitoring and improvement results.</i></p> <p>An internal assessment of all alert systems is done each year.</p> <p><i>Process to deal with incidents.</i></p> <p>The anti-fraud plan includes a process to deal with incidents which is briefly described in EDF Luminus Code of conduct page 26. All incidents reported are investigated and generate corrective measures if needed.</p>   | <p>Page 20 SDR</p> |

*Public legal cases regarding corruption.*

There are no public legal cases regarding corruption registered at EDF Luminus in 2015.

*Use of independent external assurance of anti-corruption programmes.*

In 2013, a suppliers' cartography was established, in order to identify suppliers with the highest risks. Four suppliers were evaluated by Afnor in 2015. No potential area of corruption was identified through these evaluations. The cartography was updated in 2016 and more evaluations will be requested.

*Outcomes of integration of the anti-corruption principle.*

In 2014, the EDF Group set up a reporting system within its companies for serious breaches of the Code of Ethics. EDF Luminus started to publish its own report in the 2015 Sustainability report. In 2014, a (minor) fraud case was reported to the Group and to the local police. No incidents linked to corruption were reported in 2015.

Our latest CSR rating by Ecovadis, on November 2016, grants us a 70/100 score regarding ethics.

| <b><i>Taking Action in Support of Broader UN Goals and Issues</i></b>                     |  |  |
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| <p>Criterion 15: The COP describes core business contributions to UN goals and issues</p> | <p><i>Align core business strategy with one or more relevant UN goals/issues.<br/>Adopt and modify operating procedures to maximize contribution to UN goals/issues.</i></p> <p>In September 2016, EDF Luminus was one of the first players in the SDG Voices event launched by The Shift in Belgium. EDF Luminus respects the 17 Sustainable Development Goals and strives to include in its targets &amp; action plans all of the relevant SDG goals, with a special focus on the following goals:</p> <ul style="list-style-type: none"> <li>- Goal 3: Good health and well-being of our employees - which is evident from the zero LTI incidents.</li> <li>- Goal 7: Affordable and clean energy - through 600 million euro investment in renewable energy sources from 2015-2018.</li> <li>- Goal 11 : Sustainable cities and communities -- We aim to increase the number of partnerships with sustainable cities. Current actions already include energy monitoring, electric mobility, public lighting, etc.</li> <li>- Goal 13: Climate action: EDF Luminus participated to The Shift initiative to support COP 21 agreement).</li> </ul> <p><i>Develop relevant products and services or design business models that contribute to UN goals/issues.</i></p> <p>EDF Luminus products and services contribute to climate change mitigation and adaptation. We offer various environmental-friendly products to B2C &amp; B2B customers and sustainable cities (ie. paperless bills, guaranteed green electricity contracts, CO2 compensated gas contracts, smart thermostats, boiler maintenance, supply side management, energy performance contracts, energy monitoring, public lighting, electric vehicles, etc.).</p> <p>EDF Luminus also regularly increases its renewable energy capacity. Between 2015 and 2018, we plan to invest 600 million euros in all, most of it in windmills and energy services.</p> | <p>Page 7 SDR</p> <p>Page 24 to 29 regarding energy efficiency</p> <p>Page 39 to 41 regarding renewables</p> <p>Page 52-53 regarding health, safety and well-being</p> |
| <p>Criterion 16: The COP describes strategic social investments and philanthropy</p>      | <p><i>Pursue social investments and philanthropic contributions that tie in with the core competencies or operating context of the company as an integrated part of its sustainability strategy.</i></p> <p>In 2015, our We Love Your Project Program allowed us to provide financial support to five</p>  | <p>Pages 14, 20, 55 SDR</p>  |



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|  | <p>projects supported by our employees, in partnership with NGOs for collective action. Moreover, we prioritized the health of employees by launching various sports events that combined health and charity under the Globetrotters program, which currently holds 425 participants from EDF Luminus.</p>  |  |
| <p>Criterion 17: The COP describes advocacy and public policy engagement</p> | <p><i>Publicly advocate the importance of action in relation to one or more UN goals/issues. Commit company leaders to participate in key summits, conferences, and other important public policy interactions in relation to one or more UN goals/issues.</i></p> <p>EDF Luminus is one of the first members of The Shift to publish its commitment to Goals 3, 7, 11, and 13. Our CEO, Grégoire Dallemagne, attended the SDG Voices event in September 2016 to further advocate our commitment to the goals.</p> <p>A reference to the Global Compact is also made on page 19 of our 2015 SD report, since we asked a team of 3 students from the Antwerp Management School to establish their own materiality grid, including among others GC criteria, before controlling some of the most important data included in the 2014 Sustainability report.</p> | <p>Page 7 SDR</p> <p><a href="https://theshift.be/nl/our-members/edf-luminus">https://theshift.be/nl/our-members/edf-luminus</a></p> |
| <p>Criterion 18: The COP describes partnerships and collective action</p>    | <p><i>Develop and implement partnership projects with public or private organizations (UN entities, government, NGOs, or other groups) on core business, social investments and/or advocacy.</i></p> <p>Sport and Solidarity: our employees have taken collective action in partnership with various organisations, such as Run for Parkinson and Belgian Cardiology Liga to promote a healthy lifestyle in the work place while donating to a charitable cause.</p> <p>We continued our partnerships with Faune &amp; Biotopes and Beeodiversity to protect biodiversity on some of our sites (Angleur, Lixhe, Seraing, Ringvaart, Grands-Malades, Floriffoux).</p>  | <p>Page 49 and 55 SDR</p>  |

| <b><i>Corporate Sustainability Governance and Leadership</i></b>     |  |                           |
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| <p>Criterion 19: The COP describes CEO commitment and leadership</p> | <p><i>CEO publicly delivers explicit statements and demonstrates personal leadership on sustainability and commitment to the UN Global Compact.<br/>Make sustainability criteria and UN Global Compact principles part of goals and incentive schemes for CEO and executive management team.</i></p> <p>See Letter from CEO above. The CEO of EDF Luminus constantly highlights the importance of fighting climate change by developing renewable energy and energy services, especially energy efficiency. The bonus system for the executive committee includes UN SD goals related criteria, especially LTIs.</p>   | <p>Page 10 SDR</p>        |
| <p>Criterion 20: The COP describes Board adoption and oversight</p>  | <p><i>Board of Directors (or equivalent) assumes responsibility and oversight for long-term corporate sustainability strategy and performance.</i></p> <p>Here is an extract of the message of the President of the Board, published in the SD report for 2015 : “Sustainable development is at the heart of the strategic plan of EDF Luminus. In 2015, we invested a record amount of 180 million euro, primarily in renewable energy sources and energy efficiency services. This enabled EDF Luminus to become the leader in onshore wind farms in Belgium, with an installed capacity of 254 MW. Investing in energy services is another way to help customers improve energy efficiency, which enables them to reduce both their ecological footprint and their invoice. Here, the acquisition of the company ATS in 2015 represents a decisive step in the transformation of EDF Luminus. This strategic plan enjoys the support of all of the shareholders.”</p> | <p>Pages 8 and 11 SDR</p> |
| <p>Criterion 21: The COP describes stakeholder engagement</p>        | <p><i>Publicly recognize responsibility for the company’s impacts on internal and external stakeholders.<br/>Establish channels to engage with employees and other stakeholders to hear their ideas and address their concerns, and protect ‘whistle-blowers.’</i></p> <p>In 2015, stakeholders were formally consulted to produce a materiality grid, a mandatory step to publish a GRI4-compliant report. See detailed process to engage stakeholders in the SDR.</p>  | <p>Page 14-16 SDR</p>     |