

TRACTEBEL ENGINEERING S.A.

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Modern Slavery Statement

TRACTEBEL ENGINEERING S.A. is part of the ENGIE Group providing a full range of services throughout the life cycle of its clients' projects. As one of the world's largest engineering consultancy companies and with more than 150 years of experience, TRACTEBEL is able to offer multidisciplinary solutions in energy, water and infrastructure. TRACTEBEL has offices in 33 countries and projects in more than 140 countries, employing approximately 4,500 people all over the world. TRACTEBEL comprises a number of different businesses and this statement is being made by TRACTEBEL ENGINEERING SA (Belgium) on behalf of itself and its subsidiaries operating and established in the UK.

At the helm of Energy Transition, TRACTEBEL incorporates RED GROUP, which specializes in low energy building design. Since its foundation in 2004, RED has delivered over 700 data centre project designs, many of them achieving new energy benchmarks. Headquartered in London and with international hubs in Dubai and Singapore, RED benefits from its Global Design Centre located in Manila, developing leading-edge software models for energy efficiency, Building Information Modelling (BIM), engineering calculations and drawings quicker and more efficiently than traditional models allow.

TRACTEBEL operates its activities in compliance with the ENGIE Group's ethics and compliance principles, including those relating to the respect for human rights, under the responsibility of the respective organizations' management. To find out more about our activities, please visit our website: www.tractebel-engie.com, and access "[Tractebel 2017 Activity Report](#)".

As a global player in the aforementioned fields of activity, TRACTEBEL works with a wide range of equipment and service suppliers, both locally and internationally. TRACTEBEL considers its suppliers and subcontractors as key stakeholders in the value chain. As part of the ENGIE Group, TRACTEBEL's commitments and requirements in its relations with these stakeholders are set forth in our Purchasing Policy. This Policy, which is an internal document, is presented in detail in ENGIE Group's registration document (please see [ENGIE 2017 Registration Document](#), p.99). It provides amongst others for the following commitments and requirements:

- the search for competitive bids and sustainable and innovative solutions;
- the requirement for suppliers to make health and safety commitments;
- a commitment on the part of suppliers to ethical business relationships.

TRACTEBEL's commitment to the respect for human rights, including explicitly the rejection of forced labour, is laid down in a number of key documents, including the following ones which are all publicly available on the [Ethics page of our website](#):

- our Ethics Charter and our Practical Guide to Ethics;
- our Code of Conduct in Supplier Relations; and
- a dedicated Human Rights Policy, called the "[Human Rights Referential: commitments and implementation](#)".

TRACTEBEL operates its activities in the framework of the ENGIE Group's voluntary commitments to advance ethics and human rights, including in particular its adherence to the United Nations Global Compact, the Extractive Industries Transparency Initiative (EITI), and the French section of Transparency International, as well its membership of *Entreprises pour les Droits de l'Homme (EDH)*, which aims to enhance awareness of human rights issues and their integration into the activities of member companies.

Being part of the ENGIE Group, TRACTEBEL's activities are included in the ENGIE Group "vigilance plan" which addresses the requirements of the French law no. 2017-399 of 27 March 2017 related to the duty of vigilance. Based on the UN Guiding Principles on Business and Human Rights, our dedicated human rights policy states in detail our human rights commitments and provides for operational processes to ensure that these commitments are lived up to, in particular:

- (1) A commitment to carry out our activities while **respecting internationally recognized human rights** including the international standards of the ILO (i.e. including the rejection of any form of forced labor), everywhere we operate (see commitments 1 and 2)
- (2) A commitment including the **supply chain** through a clause requiring compliance with our commitments in terms of human rights in contracts with our suppliers, subcontractors and partners (see commitment 6). The prohibition of forced labor is specifically mentioned in this clause. Through this clause, the suppliers, subcontractors and partners commit to compliance in their name and in the name and on behalf of their suppliers and sub-contractors.
- (3) **Risk analysis** by the TRACTEBEL entities for projects and on a yearly basis for activities. These analyses specifically include questions to ensure that TRACTEBEL entities do not participate in, or benefit from, any forced labor whatsoever. Methodological and awareness-raising tools are available to the TRACTEBEL entities to assist in these risk analysis. They include a precise definition of forced labor according to the ILO standards, they rank the risk of human rights for each country, and they list the points that need checking to ensure the TRACTEBEL entities do not make use of this type of work. The previous yearly risk assessment did not reveal forced labor as a salient human rights risk.
- (4) **Training and awareness-raising modules** focusing on human rights, including the issue of forced labor through practical cases, available for all TRACTEBEL employees.
- (5) **Grievance mechanisms** through an e-mail address available on the TRACTEBEL website. There were no reported violations on forced labor in 2017.
- (6) **Monitoring of the implementation of these measures** through our ethics and compliance process, internal control processes and internal audits. No issues relating to forced labor were identified in 2017 in the framework of the control processes.

The due application of these principles is monitored by the TRACTEBEL ENGINEERING SA Board of Directors.

Through this framework we ensure that our expectations towards our people and our suppliers, subcontractors and partners in relation to banning any use of forced labour, including human trafficking and slavery, are addressed.

This statement aims at addressing the reporting requirement of the UK Modern Slavery Act 2015 for TRACTEBEL which conducts business in the UK, it being understood that where other TRACTEBEL entities may have submitted their own statement to that effect, the current statement comes in addition thereto.

This statement pertains to the financial year ending on 31st December 2017.

This statement has been approved by the TRACTEBEL ENGINEERING SA Board of Directors on 13th September 2018.

Bernard GILLIOT
Director

Olivier BIANCARELLI
Managing Director