



**ETHICAL RULES
OF GRTGAZ
FOR ITS SUPPLIERS**

LETTER FROM THE CEO

GRTgaz, a key player in the field of natural gas transport, is committed to implementing and monitoring strict ethical practices in all its industrial and tertiary activities.

We expect the same level of commitment from our Suppliers and aim to develop fair, transparent, honest and long-lasting relations with them.

We have therefore decided to formalise the ethical rules of GRTgaz in order to clearly state what we expect from our suppliers, service providers and other partners and demonstrate that social and ethical responsibility lie at the heart of our commercial relations.

Compliance with these rules is a critical factor in our Supplier selection procedure. We trust that each of our Suppliers will understand, respect and implement them.

Thierry Trouvé
Chief Executive Officer

The same ethical rules apply to GRTgaz, its Suppliers and their sub-contractors, amongst which integrity, fairness, transparency, respect for each person's rights and obligations but also economic involvement in the territories and support for employment and integration. GRTgaz expects its Suppliers to comply with the following 5 fundamental ethical rules:

Rule 1: Strictly comply with regulations

GRTgaz manages its business relations and professional practices with integrity and expects its Suppliers to comply with international, national and local rules, including the "Loi Sapin II" (law no. 2016-1691 of 9 December 2016 on transparency, the fight against corruption and the modernisation of economic life) as well as the professional ethical rules relating to their business activities and their respective countries.

The Supplier states that it complies with international and national standards relating to:

- a)** fundamental human rights, in particular the prohibition of the use of the labour of children under the age of 15 and any form of forced, compulsory or slave labour;
- b)** embargoes, arms trafficking, drug trafficking and terrorism;
- c)** trade, import and export licences and customs;
- d)** the health and safety of employees and third parties;
- e)** work, immigration and the prohibition of undeclared work;
- f)** environmental protection;
- g)** economic violations and in particular corruption, illegal taking of interests, misappropriation, embezzlement of public funds, the offence of favouritism, fraud, influence peddling (or equivalent offence under applicable law), abuse of trust, abuse of the property or credit of a commercial company, counterfeiting, forgery and use of forgery and any related offences;
- h)** the fight against money laundering;
- i)** competition law;
- j)** non-discrimination - lack of distinction between people according to their social or ethnic origin, gender, age, religious beliefs, disability, etc.

The ethical standards contained in this document apply unless local law or regulation imposes higher ethical standards.

At the end of 2018, GRTgaz established a Due Diligence procedure enabling it to detect and take measures to prevent acts of corruption or influence peddling for its Suppliers and other stakeholders before considering a commercial relationship with them. GRTgaz may, in this respect, carry out or have carried out in-depth field surveys with its Suppliers.

Rule 2: Act with fairness, transparency and impartiality

All GRTgaz Suppliers are selected and treated with objectivity, fairness and loyalty during our transparent, non-discriminatory commercial practices and we rigorously ensure that the company respects all its Corporate Social Responsibility (CSR) commitments.

Each Supplier consulted by GRTgaz must sign the CSR clause – appended to the consultation file – and, every 6 months, submit the social and tax documents attesting to the legality of its situation with regard to labour and tax law.

Rule 3: Guarantee confidentiality

Suppliers shall respect the confidentiality of any information we share with them. The confidentiality of information, which, if disclosed, would infringe the rules of free and fair competition and of non-discrimination, shall be upheld in accordance with article L.111-77 of the French Energy Code.

Suppliers shall take all necessary, and notably contractual, precautions to ensure that their employees, sub-contractors and any individuals or legal entities appointed by them during the preparation or fulfilment of commercial relations uphold the confidentiality of information to which they may be privy.

The disclosure of a Supplier's know-how by any GRTgaz employee is prohibited. Similarly, the Suppliers undertake to refrain from disclosing GRTgaz know-how.

Rule 4: Avoid all conflicts of interest

A conflict of interest situation is a professional situation in which an employee's ability to make decisions, assess or exert influence may be impaired in respect of its independence or integrity due to personal considerations.

These situations may in particular result from:

- direct or indirect friendly or family ties between the representatives of the Supplier and GRTgaz employees involved in the act of purchase or likely to have an influence on it,
- the involvement of former GRTgaz employees as representatives of the Supplier,
- the involvement of employees, former GRTgaz employees or close members of staff as a direct or indirect director or shareholder of the company, the Supplier or one of its subsidiaries.

Any familiarity or personal connection between the Supplier and GRTgaz employees involved in the Purchasing process shall be avoided.

If a Supplier is confronted with a potential or proven risk of conflict of interest, they shall without fail inform their contact at GRTgaz thereof.

Rule 5: Forbid any act of corruption

Suppliers shall not offer GRTgaz any sum of money, benefit in kind or favour that could bestow a personal benefit on an employee.

Suppliers shall also avoid offering their contact person at GRTgaz gifts, invitations or other benefits that could influence any ongoing or future purchasing decisions.

Pursuant to its “Relations with Suppliers” Code of Ethics, GRTgaz shall systematically refuse any gifts or invitations offered during the development phase of a contract in particular the competitive tendering procedure or in conflict situations.

In general, the Supplier must ensure that these ethical rules are communicated to all its employees and stakeholders (sub-contractors, Suppliers, etc.).

Any Supplier observing confirmed or presumed inappropriate behaviour on the part of GRTgaz, one of its employees or agents may report it confidentially by email to the dedicated mailbox **ethique@grtgaz.com**.

Online version - the Ethical Rules of GRTgaz for its Suppliers are available:

- in French and English on the “SUPPLIERS” page of the website www.grtgaz.com.
- in the General Purchasing Conditions and the Particular Purchasing Conditions of GRTgaz