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# ETHIC Intelligence

## Decision to Award and Register ISO 37001

Awarded to

# ENGIE Group

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**Philippe MONTIGNY**

**President**

Tel. 33 (0) 1 70 08 73 16

Philippe.montigny@ethic-intelligence.com

CERTIFYING EXCELLENCE IN ANTI-CORRUPTION COMPLIANCE

**ETHIC Intelligence**

10, rue Pergolèse 75116 Paris – France

Tel. 33 (0) 1 70 08 73 16

Fax 33 (0) 1 53 81 01 78

[www.ethic-intelligence.com](http://www.ethic-intelligence.com)

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ETHIC Intelligence, certification body, according to the ISO 17021 – 9 standard “requirements for certification bodies” has asked:

**The ISO 37001 Technical Committee,**

To complete the examination of the findings presented by the Lead Auditor Jean-Christophe Carrau found during the ISO 37001 audit presented by Annick Janssens, Deputy Director Ethics, Compliance & Privacy of ENGIE.

**ETHIC Intelligence,**

- **Taking into account** the letter signed by Pierre MONGIN, Executive Vice President, Group General Secretary of ENGIE, stating his intent to submit ENGIE’s Anti-Bribery Management System to an ISO 37001 certification audit (Annex 1);
- **having taken note** of the audit report and findings presented by the Lead Auditor
- **having concluded**, after the ISO 37001 Technical Committee review that the Anti-Bribery Management System is in compliance with the ISO 37001:2016 standard;
- **Supports** the overall evaluation reached by the Lead Auditor, namely that ETHIC Intelligence agrees on the ISO 37001:2016 certification of ENGIE;

**AWARDS**, on this day and for a duration of three years (3), **ISO 37001 Certification** () in virtue of having implemented an Anti-Bribery Management System which conforms to the standard.

**Paris, 26 July 2018**

**President of ETHIC Intelligence**

A handwritten signature in black ink, appearing to read "Ph. Montigny".

**Philippe Montigny**

## ANNEX 1: LETTER OF INTENT



**Pierre MONGIN**  
Directeur Général Adjoint, Secrétaire Général

Monsieur Philippe MONTIGNY  
President of the Certification Committee  
ETHIC Intelligence  
10 Rue Pergolèse  
75116 – PARIS

Courbevoie, 27<sup>th</sup> July, 2018

Dear Sir,

I undersigned, Pierre MONGIN, Group General Secretary of ENGIE, hereby refer to the evaluation of ENGIE's Anti-Bribery Management System by ETHIC Intelligence accredited auditors in view of obtaining an ISO 37001 certification.

For the purposes of this certification process, I confirm that Xavier HUBERT, Group Ethics, Compliance & Privacy Director :

- provided auditors with all relevant data and information;
- granted auditors and accreditation body assessors access to any files they sought to consult;
- arranged meetings between the auditors and any ENGIE employees and persons working on ENGIE's account that the auditors sought to interview.

I confirm that, following the auditor's recommendation to grant the ISO certification, all information contained in the Audit File drafted by the auditor has been reviewed by Xavier HUBERT, Group Ethics, Compliance & Privacy Director and that said Audit File has been transmitted to you, as President of the Certification Committee, since the information it contains in the descriptive section (part II of the report) was considered to be complete and accurate.

Sincerely,



Pierre MONGIN

ENGIE  
1, place Samuel de Champlain, Faubourg de l'Arche  
92500 Paris La Defense Cedex, France  
T +33 (1) 44 22 99 99

ENGIE - SA au capital de 1 476 598 011 euros  
RCS Nanterre 742 137 031  
Siège Social : 1, place Samuel de Champlain, 92400 Courbevoie

## **ANNEX 2: AUDIT INFORMATION**

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The on-site audit began on March 19, 2018 at the head offices of ENGIE, in Courbevoie, France. The audit was concluded on June 7, 2018.

The audit was based on documented information review as well as interviews with executives. Documents analyzed were either made available spontaneously by the interviewees or were requested by the Lead Auditor. A sampling of sites was audited.

### **AUDIT OBJECTIVE**

The audit objective was to determine if ENGIE has implemented an Anti-Bribery Management System that could prevent, detect and mitigate the risk of bribery.

### **AUDIT CRITERIA**

The audit criteria were:

- The requirements of ISO 37001 standard
- Applicable laws
- ENGIE's policies and procedures relative to the ISO 37001 Management System

### **AUDIT SCOPE**

The audit scope covers the activities of energy production, energy distribution and energy services.