
ENGIE' policy on Western Sahara

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To: coordinator@wsrw.org

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Dear Madam,

As we undertook, please find below our general comments to your questions.

Indeed, we have preferred to explain to you our approach on human rights rather than answering your questions.

As part of our human rights approach, we analyze the risks of negative impacts on human rights of all our activities and implement a due diligence process to identify and manage the salient risks at the operational level and therefore according to the context of activities.

This is why we have put in place several in-depth vigilance actions regarding human rights around the project for which you are asking us today.

Since the beginning of the discussions, two legal analyses have been given by major law firms; a social and environmental impact study has been carried out, as well as the consultation of local communities for which you are calling us into question today and for which you have been asked.

All of these analyses were carried out by external firms, reputed and known for their knowledge and expertise in the field of business and human rights. Our aim is not to discharge ourselves of our responsibility or to "whitewash our operations" as you have indicated, but rather to ensure that we have a credible external viewpoint to enable us to adequately identify the risks and decide on the mitigation actions to be taken.

With regard to the consultation of local communities that you criticize, calling on an independent firm of international lawyers (Global Diligence) is precisely a guarantee for us to ensure that the human rights of local communities around the project are respected by effectively identifying the risks. Their objectivity in selecting the relevant stakeholders according to their expert methodology is necessary for an effective

human rights due diligence. We also considered it essential that they be able to go on site and conduct interviews, including in view of the health circumstances.

It is not our role to make decisions on general political considerations, but to ensure that at the operational level our activities do not infringe on the rights of potentially affected stakeholders. Global Diligence's mission was carried out with this in mind and in complete independence through an in-depth study of the context and ENGIE's international legal obligations as a company; a strong methodology for selecting stakeholders; and interviews with community representatives around the project. Recommendations were made that we will of course implement to ensure that the human rights of those potentially impacted by our activities are respected.

Please be assured of our attention and vigilance on this matter.

Best regards,

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