

RED

RED Client Code of Conduct

28 February 2025

RED views its clients as partners and cares about the way they do business.

This client Code of Conduct ('Code') sets out the minimum standards of behaviour that RED Group and all associated entities (RED) expects its clients to meet in the areas of corporate social responsibility, legal & ethics, data privacy & security, health & safety and environment & energy.

In this Code of Conduct **"client"** means any individual or entity that receives goods or services to RED anywhere in the world.

Clients must read, understand and ensure that their business and supply chain meet the standards outlined within this Code and must communicate it to related entities, their own clients, sub-consultants and subcontractors who support them in supplying services to RED so that they are aware of, understand and comply with this Code.

Clients' ability to meet or exceed standards within this Code will be a key consideration when RED makes decisions for a client to be onboarded.

As a company within the ENGIE Group, RED makes every effort to comply at all times, with ENGIE's policies, standards and procedures associated with client relations.

Everyone who acts on behalf of RED, must be fully aware of such requirements, and must also undertake to apply these business practices in their professional activities and abide by them.

Code of Conduct in Client and Supplier Relations

Clients are asked to comply with RED's 7 code of conduct principles relating to relationships with clients and suppliers:

1. Comply with laws, regulations, external standards, ENGIE Group commitments and internal procedures
2. Treat clients fairly, transparently and impartially
3. Ensure that mutual commitments are respected
4. Protect personal data and the confidentiality of all information exchanged
5. Foster awareness of and meet the ENGIE Group's commitments with regards to ethical and privacy standards, human rights, sustainable development, social responsibility and transition to a carbon neutral economy
6. Avoid any conflict of interests that may undermine objective and independent decision making and prohibit any act of corruption
7. Report any situation that does not comply with these rules

Ethics Guidelines for Commercial Relationships

Clients must also agree to follow the same guidelines adopted by RED on ethics and compliance as follows:

1. Corruption and fraud are strictly prohibited. No form of corruption or influence peddling, no matter how minor, will be tolerated.
2. Human rights must be respected. In line with our Diversity, Equity and Inclusion Policy, the Group condemns all forms of discrimination.
3. Environmental protection is a commitment that binds us. Environmental protection is at the core of the Group's concerns and of its CSR commitments.
4. Laws and regulations apply to each of us. Respecting international sanctions and export control rules, fairness in our business practices and respecting competition are fundamental principles, regardless where we operate.
5. Integrity and loyalty guide our relationships with third parties.

Corporate Social Responsibility

We are committed to maintaining the highest standards of corporate social responsibility in our business activities and behave with honesty and integrity in all our activities and relationships with others. To meet this commitment, we expect clients to abide by our standards and [Corporate Social Responsibility Policy](#).





Legal & Ethics

Clients must comply with the law in the countries where they operate.

At RED, we act with honesty and integrity and do not make or receive improper payments, benefits or gains. Clients must act ethically and be honest, transparent and trustworthy in all their dealings with others.

Clients are expected to comply at all times with the rules and principles of action outlined within the [ENGIE Ethics Code of Conduct](#) covering requirements and commitments in client relations with the objective to offer competitive and sustainable solutions and provide a safe working environment while complying with the company's principles of ethical business conduct.

The client should be able to confirm to RED that for a six-year period prior to receiving services from RED it has respected and complied with international and/or national applicable and enforceable rules, concerning:

- i. fundamental human rights, and, to abstain from (a) using child labour or any other kind of forced or compulsory labour; (b) any form of discrimination within their company or in relation to its clients;
- ii. embargos, the prohibition of arms or drug trafficking, and terrorism;
- iii. trade import and export licences, customs;
- iv. the health and safety of staff and third parties;
- v. work, immigration, the prohibition of illegal work;
- vi. respecting the environment in the design, production, use and disposal or recycling of all such professional services it has received;
- vii. financial criminal offences, in particular corruption, fraud, influence peddling, swindling, theft, misuse of corporate funds, counterfeiting, forgery and the use of forgeries, and similar or related offences;
- viii. measures to combat money laundering;
- ix. competition law.

RED shall have the right but not the obligation to ask the client to evidence that these commitments have been properly implemented; and shall be entitled, but not obliged, to carry out or order audits.

Where appointed under contract, any failure to meet the obligations above shall constitute a default under contract entitling the suspension and/or termination of the contract by, and at the sole and exclusive discretion of, the innocent party, at the defaulting party's exclusive costs, expenses and liabilities, under the terms and conditions set forth in this contract.

Conflicts of Interest

Clients must avoid actual, potential, or perceived conflicts of interest with RED employees. If conflicts of interest occur, they must be disclosed by contacting [RED's Ethics and Compliance Officer](#) to ensure appropriate steps are taken to manage the conflict.

Anti-bribery

RED expects its clients to maintain high standards of ethical conduct and accountability. Clients are expected to comply with the Bribery Act 2010 and all other applicable anti-bribery and anti-corruption laws and are expected to have adequate policies and procedures in place to monitor compliance with such laws.

Under no circumstances will RED tolerate or approve of any RED staff or clients' staff offering or accepting a bribe in order to gain a business or other advantage. In addition, as a basic principle, any gifts, hospitality or technical trips that RED (or RED clients) offers or receives must be reasonable and proportionate. [ENGIE Policy - Gift & Hospitality Technical Trips](#)

Human Rights

Clients must ensure that they and their subcontractors and clients shall respect the human rights of their employees and comply with all relevant legislation, regulations and directives in the country or countries in which they operate. This includes all rights and minimum standards relating to wages, benefits and working conditions applicable across their entire workforce. [RED Statement - Human Rights Modern Slavery Act](#)



Equality & Diversity

RED is dedicated to encouraging a welcoming, supportive, respectful and inclusive culture and are committed to equality, wellbeing and fairness for all our employees. We are opposed to all forms of discrimination, bullying or harassment.

We expect our clients to align with the same standards and promote diversity in their supply chain in alignment with our [Equality & Diversity Policy](#).



Data Privacy & Security

Data Privacy and Security are non-negotiable parts of how we work. We expect our clients to work with us to protect RED and our client's data and networks. The client must have an established and consistent industry standard framework for Information Technology and CyberSecurity, including Personal Information Management (Data Privacy/Data Protection). The Health position of the client can only be monitored if a well structured, enterprise-wide governance program exists to ensure that the core concepts of availability, integrity and confidentiality are supported by adequate controls. These measures must align with RED's security policies including managing and monitoring their supply chain to protect RED and our client's data and networks from breaches and unauthorised access. Where RED requires clients to meet specific security requirements, including the use of RED approved solutions or services, these requirements must be met. When clients become aware of a data or network breach, they must immediately notify RED by emailing legal-notices@red-eng.com.

Clients must treat RED's and our client's data as confidential information and only use that data for the purpose of providing services to RED.

[RED's Data Privacy Statement](#) outlines our privacy commitment and explains how we collect, use, disclose and protect personal information of individuals we deal with. clients who collect, use, store or have access to personal information held or provided by RED must have adequate processes and effective technical security controls in place to protect personal information from misuse, interference, loss, and unauthorised access, modification, and disclosure. clients must have adequate processes and controls to monitor compliance with applicable security and privacy laws and contractual obligations, including requirements such as executing a Data Protection Agreement when acting as a data processor under the EU General Data Protection Regulations. clients must not do anything which would cause RED to be perceived as acting inconsistently with its Data Privacy Statement and must have processes in place to deal with destruction and attestation.



Health & Safety

Our clients play a significant role in our business and our commitment to keep each other, our clients, and communities safe, secure, and well.

Clients must identify and comply with relevant workplace and health and safety laws and ensure their workers understand and follow health and safety policies, Group Rules, standards, and procedures that apply to their work.

Clients are expected to comply and respect the [ENGIE Life Saving Rules](#) at all times and are expected to meet or exceed [RED's Health & Safety Policy](#) as is reasonably practicable to:

1. Comply with applicable OHS relevant statutory, regulatory and other requirements
2. Establish and maintain safe and healthy working conditions for employees at their place of work, including safe operation and maintenance of equipment and facilities
3. Provide information, instruction, supervision and training as part of ensuring the development and competence of employees
4. Manage and involve employees in risk management processes to systematically identify hazards and assess and manage risks that employees and others may be exposed too, preventing harm and ill health
5. Develop and maintain a positive health and safety culture through communication, co-operation and consult with employees, clients, service providers and other stakeholders



Environmental & Energy

RED is committed to minimising its impact on the environment and as such have implemented an ISO 14001 Environment and ISO 50001 Energy Management System.

As a minimum, we ask that clients, align with our [Environment Policy](#) and [Energy Policy](#) in their operations and services as they relate to the impact on the environment.

Therefore, we ask the following:

1. Clients must comply with and provide evidence that they applicable environmental laws, standards, and notices from relevant regulators.
2. Clients minimise the adverse environmental impact of their operations, products and services
3. Where requested, clients provide Energy Performance data and/or Environmental Product Declarations for their products.
4. Clients should challenge our approach to the protection of the environment, calling out and addressing environmental damage, waste or other unsustainable practises.
5. Where requested clients evidence and make available, their environmental performance through a recognised method of assessment or certification. This includes: waste/ recycling, biodiversity/nature impact, Scope 1, 2 & 3 GHG emissions reporting & mitigation and the firm plans / commitments they have to aligning with maintaining climate change to less than 1.5C (Paris protocol(s)).
6. Clients should avoid environmental poverty by ensuring their sustainability strategies in no way restrict the opportunity for other individuals and organisations to exist sustainably.

RED



Whistleblowing

RED is committed to high standards of ethical behaviour and accountability and is committed to conducting our business with honesty and integrity, and we expect all employees and clients to maintain high standards.

However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential to prevent such situations occurring or to address them when they do occur. In line with that commitment we expect employees, and third parties we engage with, who have serious concerns about any aspect of the Company's business dealings to come forward and voice those concerns.

A whistleblowing system is in place at Group level, available to all employees and stakeholders, operated by an external provider. An alert can be reported at any time: ethics@engie.com or via telephone during business hours, in 4 languages (French, English, Spanish, or Portuguese) using the toll-free number 00 800 2348 2348.

Contact Us

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