

RED

A construction worker wearing an orange hard hat and safety glasses is seen from the back, looking towards a large industrial building under construction. The building has a complex metal framework and scaffolding. In the background, other workers in high-visibility vests are visible on different levels of the structure. The scene is brightly lit, suggesting a clear day.

RED External Freelancer Code of Conduct

29 April 2025

RED VIEWS ITS EXTERNAL FREELANCERS AS PARTNERS AND CARE ABOUT THE WAY THEY DO BUSINESS.

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

In this Code of Conduct **“External Freelancer”** means an individual or an entity (a person trading as a business) who performs work for RED but is not a direct employee. This term may include contractors, freelancers, sub-contractors, or any other individual who is not an employee, depending on contractual agreements, and is engaged by RED to perform specific tasks or projects. External Freelancers may work on-site, in office or remotely and are typically brought in to provide expertise, handle temporary workloads, or execute specialised tasks. External Freelancers operate as and work under the direction of RED.

“Business Consultants” mean individuals acting on behalf of RED Group by establishing, as a minimum, introductions to key contacts or targets to develop, maintain or complete the company's business activities. The engagement and/or use of Business Consultants in RED is strictly prohibited.

External Freelancers must read, understand and abide by the standards and requirements outlined within this Code.

As a company within the ENGIE Group, RED makes every effort to always comply with ENGIE's policies, standards and procedures.

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.

External Freelancers' ability to meet or exceed standards within this Code are a key consideration when RED makes decisions for an External Freelancer to be onboarded.

ENGIE Code of Conduct in Supplier Relations

External Freelancers are asked to comply with the following 7 Principles for relationships with suppliers as outlined within the [ENGIE Code of Conduct in Supplier Relations](#):

1. Comply with laws, regulations, external standards, ENGIE Group commitments and internal procedures

2. Treat suppliers 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

Corporate Social Responsibility

As part of our commitment to corporate social responsibility, we uphold policies that promote ethical, sustainable, and socially responsible practices. We expect all External Freelancers to align with our values by adhering to the highest standards of integrity, respect, and professionalism in their work with us.

This includes compliance with our policies on environmental sustainability, human rights, diversity and inclusion, and health and safety. By working together, we can ensure a positive and responsible impact on our people, communities, and the environment.

To meet this commitment, we expect External Freelancers to abide by our standards and [Corporate Social Responsibility Policy](#).





Legal & Ethics

External Freelancers 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. External Freelancers must act ethically and be honest, transparent and trustworthy in all their dealings with others.

External Freelancers 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 supplier 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.

1. The External Freelancer without any limitation (a) confirms to RED that for a six-year period prior to providing goods or services to RED it has respected and complied with and (b) it and its suppliers shall respect and comply with international and/or national applicable and enforceable rules, concerning:
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 suppliers;
2. embargos, the prohibition of arms or drug trafficking, and terrorism;
3. trade import and export licences, customs;
4. the health and safety of staff and third parties;
5. work, immigration, the prohibition of illegal work;
6. respecting the environment in the design, production, use and disposal or recycling of the product;
7. 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;
8. measures to combat money laundering;
9. competition law.

RED (a) shall have the right but not the obligation to ask the External Freelancer to evidence that these commitments have been properly implemented; and (b) 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

External Freelancers 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 External Freelancers to maintain high standards of ethical conduct and accountability. External Freelancers 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 employees, External Freelancers, Suppliers or suppliers' 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 suppliers) offers or receives must be reasonable and proportionate. [ENGIE Policy - Gift & Hospitality Technical Trips](#)

Human Rights

External Freelancers must ensure that they 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. [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 External Freelancers to align with the same standards and promote diversity 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 External Freelancers to work with us to protect RED and our client's data and networks. At all times we and our client's demand encryption and protection of data on our systems or client's system only.

This is how we apply our client's contractual commitments to you, and no deviation in data handling is permitted. When External Freelancers become aware of a data or network breach, they must immediately notify RED in accordance with RED's [Incident Reporting](#) Procedures.

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

External Freelancers must comply with [RED's Security Policy](#).

[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.

External Freelancers 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. Suppliers 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.

External Freelancers 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

External Freelancers play a vital role in supporting our commitment to safety, security, and professional excellence.

External Freelancers are expected to align with RED's health and safety policies, customer site-specific requirements, and [Life Saving Rules](#) and [Safety Essentials](#) while upholding the legal, contractual, and duty-of-care obligations necessary for a safe and responsible working environment.

Freelancers are expected to meet or exceed [RED's Health & Safety Policy](#) as is reasonably practicable to meet the following requirements:

1. Abide by all applicable occupational health and safety laws, regulations, and contractual obligations relevant to their role.
2. Ensure the safety, well-being, and security of themselves, colleagues, clients, and others who may be impacted by their activities.
3. Promptly report hazards, incidents, near misses, or non-compliances to the appropriate contact without delay.
4. Demonstrate the necessary skills, qualifications, and knowledge to perform tasks safely and effectively, and participate in ongoing learning to maintain competence.
5. Promote a positive safety culture by engaging in open communication, collaboration, and consultation with RED, clients, and stakeholders.
6. Actively engage in hazard identification, risk assessments, and the implementation of control measures to minimise risks and follow safe work practices.
7. Ensure physical and mental readiness to perform duties and promptly inform RED of any condition that may affect safe working.

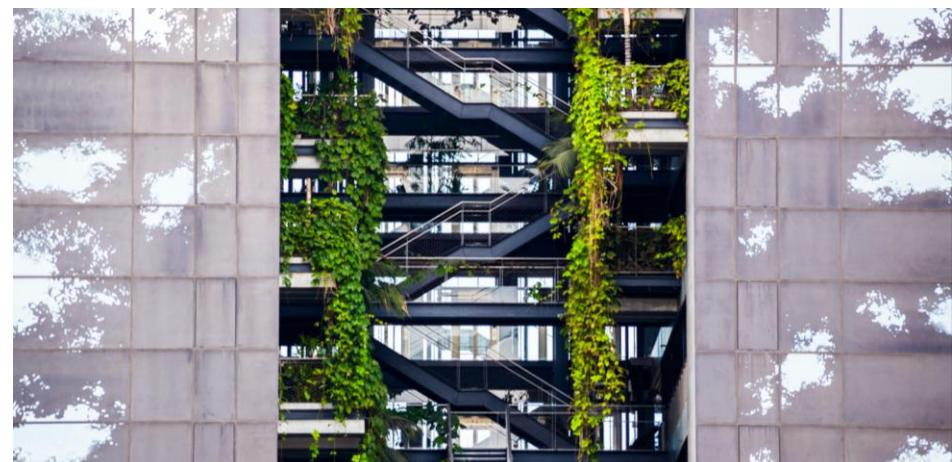
By embodying these principles, Freelancers help foster a culture of safety, competence, and excellence, ensuring the highest standards in all activities undertaken on behalf of RED.



Environmental & Energy

RED is committed to minimising our 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 External Freelancers, align with our [Environment Policy](#) and [Energy Policy](#) in their operations and services as they relate to the impact on the environment.





Onboarding Programme

The onboarding process for External Freelancers is essential for their seamless integration and to ensure the quality of work delivered aligns with legal and regulatory standards. This is crucial for maintaining RED's reputation and operational efficiency.

To equip External Freelancers with the necessary information and resources for safe, secure, and effective performance, they will undergo the following inductions as part of their onboarding:IT

- ✓ Ethics
- ✓ TeMIs
- ✓ Quality (including Project Delivery)
- ✓ Health, Safety & Security



Mandatory Training

External Freelancers are required to complete mandatory training modules to ensure they understand and adhere to key regulations and policies.

Modules are accessed through RED's Learning Management System, [SEZAME](#) and International SOS and must be completed within the first week of the contract start date:

- 1. Health & Safety:** ensures adherence to safety protocols, reducing workplace accidents.
- 2. Equality & Diversity:** promotes fair treatment and prevents discrimination.
- 3. Fraud and Bribery Prevention:** educates on avoiding unethical practices and understanding legal implications.
- 4. Travel Security** to provide essential medical and security information for international business travel via International SOS

By completing this training, we foster a safe, inclusive, and legally compliant work environment for everyone in alignment with RED's values and standards.

Access to Training Portals

- Access SEZAME using this [link](#).
- Access International SOS using this [link](#)
 - Use your RED email address.
 - It's a two-step login, firstly into International SOS and again to access the eLearning platform.
 - ENGIE Membership Number to login to International SOS: 15ACPA000002.



Business Travel & Accommodation

Persons outside of RED (or ENGIE) do not have access to the contractual conditions negotiated for RED. Third parties (including External Freelancers, suppliers and sub-consultants) under contract with RED are responsible for booking and paying for their own transport tickets. The costs of third parties/suppliers must be invoiced to RED with a purchase order and cannot be reimbursed by expense account. RED's financial responsibility for the expenses of third parties/suppliers will be limited to the conditions described in the Travel Policy. Any expenses must be approved by the relevant project director prior to them being claimed.

Security – International Travel

External Freelancers take cognisance of and of and are required to abide by RED's Travel security policy which requires the following requirements to be met:

1. International travel manual trip registration

- Log all RED related travel in the ISOS portal under 'MyTrips' or by email, which RED Admin can facilitate on request.
- This allows RED, via ENGIE, to monitor your journeys and assist you in the event of an emergency.

2. Completion of eLearning (24 month validity)

1. Travel Risk Awareness - Security
2. Travel Risk Awareness - Medical
3. Discover Your International SOS Benefits

3. Download of the [ISOS Assistance App](#)

- Use Assistance App for the most up-to-date location-based alerts, information on security situations.
- App use is limited to those with a RED email address. Freelancers are covered by ISOS (even if they do not have access to the App and the information portal); it is therefore important to follow the mandatory eLearnings.

4. Travel validation

- for travel to Countries considered high or extreme risk ([ISOS travel country risk map](#))

International SOS provides assistance in the event of threatening situations such as civil and political unrest, insurrections, revolution and similar situations by providing information, guidance and resources in the event personal safety and security can no longer be assured.

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 suppliers 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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