

ENVIRONMENTAL CODE

Preserving & protecting species,
biodiversity and the climate



CONTENTS

1

Introduction

Our pledge

GSE and sustainable development

2

Context

Definitions

Responsibilities

3

Rules & commitments

General principles

Carbon footprint

Energy consumption

Water

Land

Biodiversity

Waste

Due diligence

4

Implementation

Internal controls

Whistleblowing

Sanctions

5

Risk anticipation

Communication

Training



1. INTRODUCTION

1.1. Our pledge

1.2. GSE and sustainable development

1.1. Our pledge

“GSE will lead our industry in improving the standards of sustainable development.”

GSE is a responsible company. This is nothing new: we have a long record of commitment to sustainable development. In 2003, we joined the Global Compact France as soon as it was created. In 2007, we drew up our Quality & Safety Handbook to protect all workers on our construction sites. In 2010, we obtained our first environmental certificates for logistics buildings. In 2013, we signed our first gender equality agreement. In 2017, we joined the French Business Climate Pledge. In 2018, we created the GSE Foundation. In 2020 we launched an R&D programme dedicated to sustainable buildings. And since then, we have continued to harness our resources and innovate for sustainable development.

We are committed; we keep our promises; we are transparent. We embody our values and share them. Above all, we give ourselves the means to achieve our objectives.

Our commitments translate into concrete actions.

We are aware of our social responsibility and of the path we are taking. We also know what we do not want to see: human rights violations, corruption and environmental degradation.

Wishing to set these commitments in stone, we drafted several codes of conduct, which apply to everyone at GSE.

Thank you all for sharing them and turning them into principles of day-to-day behaviour.

**Roland PAUL,
Chairman**

The Executive Committee

GSE's Executive Committee pledges to comply with the company's Environmental Code and to bring it to life in everything it does. The Code applies in full to everyone at GSE and concerns all our activities.

All members of the team are expected to adhere to these principles, bearing responsibility for both themselves and the company, its reputation and the trust it inspires.



<p>Christophe MALERGUE China Director</p> 	<p>Muriel LECOUCHE Chief Customer Officer</p> 	<p>Robert DE MARCHI Business Development Director</p> 	<p>Thierry MILLON EMEA Director</p> 
<p>Aurore MALBLANC Human Resources Director</p> 	<p>Manuel SANNA Technical Director</p> 	<p>Roland PAUL Chairman</p> 	<p>Thierry CHAMBELLAN Retail and Industry Director</p> 
<p>Benoit BILLON SME Director</p> 	<p>John BALTAY Chief Marketing Officer</p> 	<p>Emmanuel GUILLOT CFO</p> 	

1.2. GSE and sustainable development

Our job is to design and build real estate. We aim to stand out through the added value we create for our clients, who are the focus of our projects, our actions and our concerns.

GSE has developed its business with consideration for ethical, social and environmental concerns, applying a sustainable development strategy across the company. We carry out this strategy by means of a roadmap, which spells out the objectives and the path to be followed in terms of sustainable development in three major areas, addressing seven challenges.



Our ESG roadmap to 2025

Governance	Social	Environment
 ETHICS Ensure ethics and transparency	 HUMAN RIGHTS Respect human rights and diversity	 CLIMATE Cut consumption and carbon footprint
 STRATEGY Promote sustainable development	 HEALTH Ensure health and wellbeing	 BIODIVERSITY Preserve habitats and species
		 WASTE Reduce, reuse and recycle waste

GSE has expressed its commitments in seven key documents: the Code of Ethics, to which three specific policies are related (Anti-Corruption, Conflict of Interest Management, Whistleblower Protection), the Responsible Purchasing Code, the Human Rights & Diversity Code and the Environmental Code.

In this context, the Environmental Code aims to formalise GSE’s commitments to environmental protection throughout our buildings’ lifecycle (production, construction, operation, end of life), as well as in the company’s own operations (offices, sales, marketing and purchasing activities, etc.).





2. CONTEXT

2.1. Definitions

2.2. Responsibilities

2.1. Definitions

CODE

Formal statement of GSE's commitments, their implementation and communication. It can translate into one or more specific company policies that affirm its guidelines, fundamental ideas, collective values and rules regarding specific issues.

GSE

GSE and all companies belonging to the group.

STAKEHOLDERS

All persons or organisations that can impact or be impacted by GSE's activities, directly or indirectly.

TEAM MEMBER

Any person, whether an employee or an external partner, who works directly for GSE.

SUPPLIER

A generic term designating a GSE supplier or subcontractor of level 1 or 2.

ENVIRONMENT

All the natural and cultural conditions that can affect living organisms and human activities. As defined by the French Environmental Code, the term "environment" will be used here to cover nature, i.e. animal and plant species, biological equilibria, natural resources (water, air, soil, mineral deposits), as well as sites and landscapes.

ECO-RESPONSIBILITY

Refers to all actions and behaviours aimed at limiting the impact of activities on the environment. Eco-responsibility involves choices in terms of management, purchasing, work organisation, investments and training.

2.1. Definitions

CARBON

The term carbon is used generically to refer to all greenhouse gases responsible for climate change, and therefore expressed as CO2 equivalent.

CARBON FOOTPRINT

The carbon footprint is standardised around three scopes. For GSE:

- Scope 1: emissions from the fleet of vehicles belonging to GSE
- Scope 2: emissions from consumption on GSE premises and other current activities
- Scope 3: emissions from sources not owned or directly controlled by GSE (construction sites, in particular)

BIODIVERSITY

Refers to the diversity of the living world at three levels: ecosystem diversity, species diversity and gene diversity.

ECOSYSTEM

A system of interactions between a group of organisms (biocenosis) and their specific environment (biotope).

LIFECYCLE ANALYSIS (LCA)

According to the French Agency for Ecological Transition (ADEME), an LCA "identifies and quantifies, throughout the life of products, the physical flows of matter and energy associated with human activities. It evaluates the potential impacts and then interprets the results obtained based on its initial objectives." This standardised tool is used in ecodesign to measure the environmental impacts of a service or product throughout its life cycle.

ECO-DESIGN

According to standard NF X 30-264 of French standards agency AFNOR, eco-design can be defined as "the systematic integration of environmental aspects from the design & development phase of products (goods & services, systems) with the objective of reducing negative environmental impacts throughout their life cycle for an equivalent or superior service. This approach, from the beginning of the design process, aims to achieve the best balance between environmental, social, technical and economic requirements when designing and developing products."

2.2. Responsibilities

ALL RESPONSIBLE

This policy applies to all persons working with GSE regardless of their status and level of qualification and classification, including directors, executives, managers and other employees (whatever their employment status: permanent, fixed-term or temporary), consultants, contractors, apprentices, expatriate employees, casual workers, volunteers, interns, agents, sponsors, or any other person associated with any entity belonging to GSE, wherever located.

It does not supersede applicable laws and regulations.

It defines attitudes to adopt and benchmarks for exemplary personal and professional conduct in the interest of the company.

In implementing these rules, you should demonstrate common sense and probity.

Through a good knowledge of these rules, you will be able to determine when red lines are close to being crossed and when it becomes necessary to seek advice from a manager or the Ethics Officer.

ETHICS OFFICER

GSE's management defines the Group's environmental policy and ensures that it complies with our legal and moral obligations.

GSE has appointed Jean-Michel Scuitto to the position of Ethics Officer. All requests for clarification or interpretation of this code should be addressed to him.

His mission is to ensure, in liaison with the operational or functional departments, that the code is properly understood. He may be consulted directly, in complete confidentiality, by any team member who experiences issues or has questions about the definition or application of these rules.

CONTACT

Jean-Michel Scuitto,
Risks, Audit, Ethics and CSR Director
jmscuitto@gsegroup.com



3. RULES & COMMITMENTS

3.1. Key principles

3.2. Carbon footprint

3.3. Energy consumption

3.4. Water and aquatic environments

3.5. Land

3.6. Biodiversity

3.7. Waste

3.8. Due diligence



3.1. Key principles

3.1.1. GSE is committed to the 27 principles of the 1992 Rio Declaration on Environment and Development, including Principle 4, which states that “In order to achieve sustainable development, environmental protection shall constitute an integral part of the development process and cannot be considered in isolation from it.”

3.1.2. GSE has focused its entire sustainable development strategy, and in particular its environmental aspects, on the United Nations Sustainable Development Goals (SDGs) making up the 2030 Agenda, committing in particular to:

- SDG 3: Ensure healthy lives and promote well-being for all at all ages
- SDG 5: Achieve gender equality and empower all women and girls
- SDG 7: Ensure access to affordable, reliable, sustainable and modern energy for all
- SDG 9: Build resilient infrastructure, promote inclusive and sustainable industrialisation and foster innovation
- SDG 11: Make cities and human settlements inclusive, safe, resilient and sustainable
- SDG 12: Ensure sustainable consumption and production patterns
- SDG 13: Take urgent action to combat climate change and its impacts
- SDG 15: Protect, restore and promote sustainable use of terrestrial ecosystems.

3.1.3. GSE is aware of its duty to advise its clients and partners on environmental issues. The Group is continuously strengthening its expertise in this field, to systematically offer a range of the most effective solutions for environmental protection.

3.1.4. GSE always applies the precautionary principle in its activities, in line with the 1992 Rio Declaration: “Where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation.”

3.1.5. In all its activities, GSE implements eco-responsible practices to integrate environmental issues at all levels of the business and carries out awareness-raising and training activities for all team members.

3.1.6. GSE focuses its research & development strategy and its investments on environmentally friendly solutions and innovations that mitigate or improve the impact of buildings.

3.2. Carbon footprint

3.2.1. GSE is committed to the global target set by the Paris Agreement to maintain global warming under 2°C above pre-industrial levels, and to continue the work to limit the temperature rise to 1.5°C.

3.2.2. GSE makes every effort to measure all its carbon emissions as accurately and broadly as possible. Emissions are assessed in three main areas: emissions linked to employee travel, emissions linked to energy consumption on the premises, and emissions linked to construction projects. We carry out a systematic Life Cycle Assessment (LCA) of our construction projects during the design phase.

3.2.3. Everyone at GSE stands behind the effort to avoid, reduce and offset carbon emissions in all our activities.

Measure

- We carry out an annual assessment of Scope 1 and 2 carbon emissions (travel, offices' energy consumption, digital activities)
- We conduct an annual assessment of the main component of Scope 3, i.e. the impact of our buildings, through systematic Life Cycle Assessments of our construction projects.

Reduce

- We restrict travel to the essential, by leveraging in particular digital tools (videoconferencing, etc.), and by optimising the use of cars / promoting sustainable means of transport
- We equip GSE's premises with low energy consumption solutions, particularly in terms of heating and air conditioning, while raising awareness of good practices to reduce consumption
- We suggest optimisation solutions to our clients to reduce the carbon impact of their buildings (in France, our objective is to reach level C1 of the E+C- label and its equivalent in the RE2020 standard)

Offset

- Offset residual Scope 1 and 2 emissions every year
- Offer clients solutions for offsetting their buildings' emissions.

3.3. Energy consumption

3.3.1. GSE is committed to complying with current regulations to ensure low energy consumption in all its buildings.

3.3.2. GSE is committed to improving the energy efficiency of buildings right from the design phase. We reduce energy consumption during the use phase by installing efficient thermal and electrical equipment and by monitoring the building's consumption. To validate the equipment and technical solutions selected, a Dynamic Thermal Simulation is carried out to realistically model the building's thermal behaviour, particularly in a heat wave.

3.3.3. GSE is committed to promoting renewable energy in its projects, relying on solar and geothermal energy.

3.3.4. GSE helps clients who wish to obtain the BEPOS Effinergie 2017 label by investing in an efficient building with a high-performance envelope and low energy consumption and carbon emissions.

3.3.5. GSE is committed to reducing the energy consumption of its offices and local branches.

- We install high-performance equipment.
- Our head office is powered in part by solar panels.
- We monitor our consumption in real time.
- We keep employees informed about best practices.

3.4. Water & aquatic environments

3.4.1. From the design stage, GSE factors in water stewardship issues for the duration of the building's life cycle. In particular, GSE suggests solutions to reduce consumption, limit soil surface sealing and support rainwater infiltration in situ, based on to the site's hydro-geological characteristics.

3.4.2. GSE undertakes to measure, monitor and reduce water consumption on construction sites and to check for leaks.

3.4.3. To ensure the protection of aquatic environments, GSE undertakes to:

- comply with any recommendations of the environmental engineer
- anticipate risks during the construction phase
- limit pollution and wastewater discharge during the construction phase
- fight erosion, manage surface runoff and manage sedimentation.

3.4.4. In our offices' operations, including our catering activities, we undertake to procure only sustainably fished seafood, guaranteeing the protection of conservation areas, the seabed and marine biodiversity.

3.5. Land

3.5.1. GSE is committed to minimising soil sealing, in particular by:

- making construction denser, with proposals of complementary uses or verticalization (high-bay buildings, multi-storey warehouses) to limit buildings' footprint
- considering permeable materials to avoid water run-off
- renovating and/or redeveloping industrial brownfield, thereby reducing the use of undeveloped land.

3.5.2. During the construction phase, GSE is committed to limiting soil pollution caused by products and accidental spills. All construction sites are equipped with decontamination kits to deal with any critical situations.

3.6. Biodiversity

3.6.1. Where contractual conditions permit, GSE is committed to avoiding impacts on biodiversity throughout a project's duration, including by:

- calling upon an environmental engineer from the design phase, for recommendations adapted to the project's local context, or carrying out a critical analysis of existing environmental assessments
- aiming for 100% infiltration of rainwater whenever local conditions allow
- favouring construction on existing brownfield sites
- proposing multi-layered landscape projects adapted to the development of biodiversity, as well as vegetation programmes including endogenous, melliferous and non-invasive species.

3.6.2. During the construction phase, GSE is committed to protecting biodiversity and the local environment by marking out and installing appropriate protection around the construction site routes, to protect species from the flow of people, materials and equipment, as well as from noise and light pollution.

3.6.3. In the case of construction sites involving the presence of protected species, GSE deploys avoidance measures to favour the preservation of habitats where possible. Otherwise, impact reduction measures are implemented by capturing and moving species to identified sites, creating new habitats and monitoring populations over time.

3.6.4. GSE suggests to its clients opportunities to participate in local offset projects, to compensate for the impact of land development on biodiversity loss.

3.7. Waste

3.7.1. GSE measures the volume of its annual waste production. The monitoring is made public once a year in our CSR report, which is freely accessible on our website.

3.7.2. GSE is committed to eliminating and reducing its waste production on its premises, in particular through:

- print reduction programmes
- eliminating disposable tableware
- preventing food waste
- raising team members' awareness.

3.7.3. In its projects, GSE is committed to reducing waste production by optimising the volume of resources and by supporting the re-use of interior fixtures and finishing materials in renovation projects.

3.7.4. GSE is committed to recycling as much construction waste as possible, with the aim of achieving a recovery rate that exceeds the legal requirements set in each country.

3.7.5. Hazardous waste is sorted and monitored according to specific rules, in compliance with regulations in force, to limit its impact on the environment.

3.8. Due diligence

3.8.1. As defined by the OECD, due diligence is “a process that companies should undertake to identify, prevent, and mitigate actual and potential adverse impacts of their operations, supply chains and business relationships, and to be accountable for how these impacts are addressed.”

3.8.2. GSE undertakes, in all of its activities, to comply with the French law n° 2017-399 of 27 March 2017 on the duty of vigilance.

3.8.3. In doing so, GSE will strive to prevent infringements of standards of ethics, violations of human rights or fundamental freedoms, and prejudice to human health & safety and the environment, throughout its supply chain.

3.8.4. Due diligence extends to the activities of GSE’s level 1 and level 2 suppliers in France and abroad, bearing in mind that suppliers below level 2 are contractually excluded from our operations.

3.8.5. Suppliers are informed of GSE’s requirements in terms of ethics, human rights and the environment through GSE’s Responsible Purchasing Code.

3.8.6. GSE plans, monitors and controls due diligence procedures regarding its suppliers on issues of ethics, human rights and the environment, and more generally legal compliance.

[More in GSE’s Responsible Purchasing Code](#)

4. IMPLEMENTATION

4.1. Internal control

4.2. Whistleblowing

4.3. Sanctions

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4.1. Internal control

Compliance with and application of these rules are mandatory for all team members, regardless of their roles and responsibilities. Everyone must exercise vigilance for themselves, their professional relations, their team and anyone placed under their responsibility.

All team members participate in the continuous improvement of the risk management system, facilitating the identification of issues and their resolution. They contribute attentively and diligently to investigations, reviews and audits carried out within the framework of internal control.

Any employee who notices or suspects an existing or future violation of this policy must inform the Ethics Officer.

Any obstruction of the proper execution of controls and audits, whether by an internal department or a third party (e.g. auditors), as well as any concealment of information in this context, is prohibited and would constitute a serious breach of these rules.

4.2. Whistleblowing procedure

Any employee, external stakeholder or third party may use the GSE whistleblowing procedure, in compliance with the laws and regulations in force in the country in which he or she resides or works, if he or she suspects a violation of regulations (anti-corruption, competition law, labour law, etc.) or of GSE's codes and policies.

GSE has established a specific procedure for the protection of whistleblowers. It is freely accessible on our intranet and our website.

If team members have concerns about informing their direct supervisor or believe that the reported irregularity may not be followed up appropriately, the whistleblowing procedure provides an alternative method of reporting potential violations.

This reporting system guarantees the complete anonymity of the whistleblower (source of the alert) and of the persons reported (who are presumed innocent), under the conditions laid down by the applicable law.

GSE undertakes to ensure that no whistleblower will be sanctioned, dismissed or subjected to any direct or indirect discriminatory measure, in particular with regard to remuneration, profit-sharing or distribution of shares, training or requalification, assignment, qualification, classification, promotion, transfer or contract renewal, for having reported or testified, in good faith, to facts constituting an offence or a crime of which they may have become aware in the performance of their duties. Any form of reprisal against a whistleblower is prohibited and may, where relevant, lead to disciplinary and criminal sanctions.

A group of five contact persons has been specifically established to receive alerts:

Position	Name	Telephone	Email
Chairman	Roland PAUL	+33 (0)4 90 23 74 05	rpaul@gsegroup.com
Director of Risks, Audits, Ethics and CSR	Jean-Michel SCUITTO	+33 (0)4 90 23 74 86	jmscuitto@gsegroup.com
Human Resources Director	Aurore MALBLANC	+33 (0)4 90 23 74 24	amalblanc@gsegroup.com
Chief Legal Officer	Patrice ROGER	+33 (0)4 90 23 74 44	proger@gsegroup.com
Employee representative	Philippe REY	+33 (0)4 90 23 74 47	prey@gsegroup.com

Reports can be emailed to: alerte.gse@gmail.com

In France, any individual may address the Ombudsman, who will refer them to the appropriate body to receive the alert.

4.3. Sanctions

These rules have been approved by GSE's Executive Committee and apply to everyone in the company, at all levels of seniority.

Any breach of these rules would amount to misconduct and could be subject to appropriate sanctions and prosecution in accordance with applicable law. In addition, suppliers may be excluded from GSE's procurement process and, where appropriate, our contractual relationship may be terminated.

Sanctions could include dismissal for misconduct and claims for damages.

If you have any questions or difficulties in understanding these rules or their implementation, please contact the Ethics Officer.



5. RISK ANTICIPATION

5.1. Communication

5.2. Training

05

5.1. Communication

All team members are expected to be familiar with this Environmental Policy and the related standard operating procedures – and to behave accordingly.

The policy, which contains provisions falling within the scope of internal rules, was drawn up in consultation with the employee representation bodies and was posted and filed in compliance with Articles R. 1321-1 and R. 1321-2 of the French Labour Code.

Information on our Environmental Policy is an integral part of employee induction. Every employee or person concerned is given a copy of the policy when they are hired or introduced to the company. It is also available on the intranet and from the Human Resources Department. Employees undertake to read it and comply with its terms.

The policy is posted at all GSE sites.

Occasional workers and external organisations have access to the policy through the GSE's website. Any person responding to a call to tender or a consultation issued by the company will be informed of its existence.

The Environmental Policy is published in French and English, to enable all GSE employees and stakeholders to become familiar with it.

Any amendments and additions to the Policy will be subject to the same procedures of consultation, communication, publicity and filing.

It has been in force since 13 December 2021.

All persons affected by the Environmental Policy are invited to comment and suggest ways to improve the rules therein. Comments, suggestions and requests should be addressed to the Ethics Officer.

5.2. Training

All active employees receive regular, ongoing and appropriate training, including regarding the application of and compliance with the Environmental Policy. GSE undertakes to train all its team members regarding the rules deriving from the policy.

Environmental training is an integral part of employee induction.

To ensure that its employees understand the Environmental Policy, GSE has developed an online course covering all its significant elements.

The course is mandatory for all GSE employees, regardless of their position in the company.

Any amendment to the Environmental Policy will lead to an update of the course.

GSE undertakes to communicate regularly on the rules of the Environmental Policy to its employees and partners, in particular its clients and suppliers.

The Ethics Officer issues a reminder of these rules annually.



GSE