GSE's commitments

ENVIRONMENTAL CODE

Preserving & protecting species,
Biodiversity and the climate

CONTENTS

1 **Introduction**

Our pledge

GSE and sustainable development

2 **Context**

Definitions

Responsibilities

3 **Rules & commitment**

General principal

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

01

1.1. Our pledge

“GSE is committed to playing a leading role in improving our industry's standards for sustainable development.”

For over twenty years, we have been actively committed to raising the standards of our industry in terms of sustainable development. Our track record and achievements bear witness to this profound and ongoing commitment: *Joining the French Global Compact network when it was created in 2003, creating a Quality and Safety Vademecum in 2007, our first environmental certifications in 2010, signing a gender equality agreement in 2013, creating the GSE Foundation in 2018, launching our eco-responsible buildings R&D programme in 2020…*

In 2023, we took the next step by becoming a ‘Mission Company’. Our purpose, **" Designing and building with respect for nature, developing by serving local communities, prospering by taking care of people "**, now guides all our actions.

We are aware of our social responsibility and the path we wish to take. We also know what we are not prepared to accept: failure to respect human rights, corruption and environmental degradation.

We wanted to set these commitments in stone. So, we wrote our charters, which apply to each and every one of us.

Thank you all for sharing them and making them everyday principles.

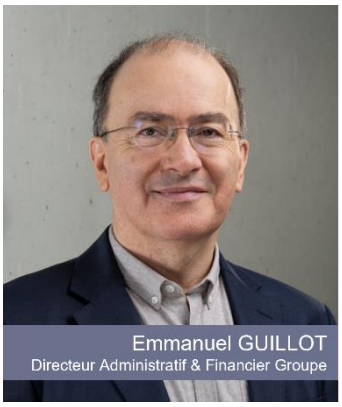
Roland PAUL,
Chairman of GSE

The Executive Committee

We are committed to respecting this code of ethics and to putting it into practice in everything we do. This charter applies to everyone and knows no boundaries within the Group ; it applies to all our activities.

Ethics are the responsibility of each and every member of the team, as well as the responsibility of the Group, the trust it inspires and the reputation it has earned.









1.2. GSE and sustainable development

GSE's core business is the design and construction of real estate. GSE aims to differentiate itself through the added value it creates for its Clients, placed at the heart of its projects, its actions and its concerns. Sustainable development is a pillar for building the Group's future, and a necessity for reducing and anticipating environmental and social crises.

In 2019, GSE created its first roadmap with 5-year objectives, specific actions and steering indicators, all selected on the basis of the Global Compact's universal framework.

In 2023, the Group has decided to go even further by becoming a company with a mission, thus placing CSR at the heart of its strategy, its transformation, its businesses and its DNA. As a natural consequence, a new roadmap is taking shape, based on three main axes :

- **Reducing environmental impact** by developing new, innovative solutions for building in harmony with the living world.

-**Local presence** through employment, the materials used and the creation of local ecosystems.

- **Development in the interests of employees, customers, suppliers and partners** in order to reconcile economic sustainability, quality of life at work and professional development.

As a result, the company's sustainable development strategy is now guided by a purpose : "*to design and build with respect for nature, to develop by serving the territories and to prosper by taking care of people*".

In addition, GSE has formalised its commitments in **7 key documents**: the Ethics Charter, to which are added three specific policies (anti-corruption, management of conflicts of interest and protection of whistleblowers), the Responsible Purchasing Charter, the Human Rights and Diversity Charter and the Environmental Charter.

In this framework, the aim of the responsible purchasing charter is to present and encourage GSE suppliers to comply with the principles of ethics, respect for human rights and protection of the environment.





2. CONTEXT

2.1. Definitions

2.2. Responsibilities

02

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 person 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-RESPONSABILITY

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.

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 eco-design 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

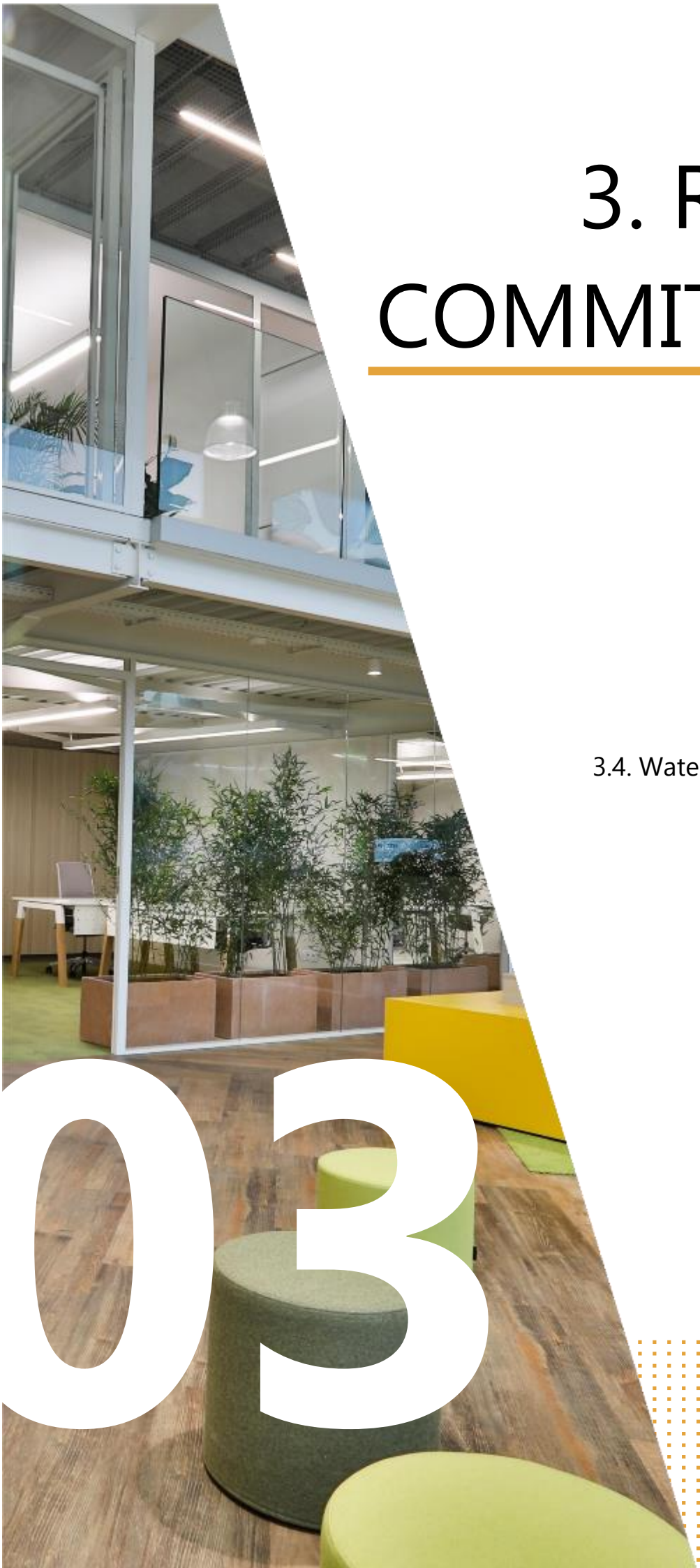
GSE's management defines the Group's environmental policy and ensures that it complies with our legal and moral obligations.

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

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

Mario Milanesi,
Ethics Officer,
mMilanesi@gsegroup.com



3. RULES & COMMITMENTS

3.1. Key principles

3.2. Carbon footprint

3.3. Energy consumption

3.4. Water and aquatic environment

3.5. Land

3.6. Biodiversity

3.7. Waste

3.8 Due diligence

03

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 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 the importance of its duty to advise its customers and partners on environmental issues. The Group is continually strengthening its expertise in order to systematically offer a range of the most effective solutions for environmental protection. In August 2023, GSE became a "société à mission" with a raison d'être focused on Sustainable Development: "Designing and building with respect for nature, developing to serve local communities, prospering while taking care of people". The transition to a mission-driven company involves defining a sustainable development path to 2030 and calling on GSE employees and stakeholders to propose more effective solutions.

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 makes every effort to measure all its carbon emissions as accurately and widely as possible. Emissions are assessed in 3 main areas: emissions linked to employee travel, emissions linked to energy consumption on the premises, and emissions linked to construction projects. The latter are the subject of a Life Cycle Assessment (LCA), which tends to be systematic from the study phase onwards, with the aim of defining a trajectory for reducing its carbon footprint, with an associated action plan.

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

Measure

- Carry out an annual assessment of carbon emissions for all scopes 1, 2 and 3 (first assessment in July 2024 for the 2023-2024 activity).
- To systematically carry out carbon estimates for our projects, right from the commercial phase. The aim is to disseminate this information to our customers and offer them solutions to reduce the carbon footprint of their project as early as possible.
- Aiming to carry out a Life Cycle Assessment at various key phases of GSE projects, in order to monitor changes in their carbon footprint and propose appropriate solutions to reduce it.

Reduce

- Define a trajectory for reducing GSE's carbon footprint, based on the first carbon assessment carried out in 2024, with an associated action plan.
- Leading internal working groups to source and implement new, less carbon-intensive solutions.
- Offering our customers ways of reducing the carbon impact of their buildings, based on Life Cycle Analyses carried out on their projects. This approach may or may not be accompanied by environmental certification (e.g. HQE, BREEAM, LEED, DGNB), an environmental label (e.g. BBCA, Zero Carbon) or GSE's eco-responsible approach.
- Propose solutions to reduce the energy consumption of GSE buildings, particularly in countries outside France where electricity is more carbon-intensive and where the carbon impact of the energy consumed by buildings constructed by GSE is all the greater.
- Limiting travel to the essentials, in particular through the use of digital tools (videoconferencing, etc.), and optimising car use by promoting sustainable modes of transport.
- Equip GSE's premises with low-energy consumption solutions, particularly in terms of heating and air conditioning, while raising awareness of best practices for reducing consumption.

Offset

- Offset part of the residual emissions, particularly for scopes 1 and 2.
- Offer customers solutions for offsetting emissions linked to their building, after carrying out measurement and reduction actions on their project.

3.2.3. GSE offers its customers solutions for re-using materials in order to limit the consumption of resources and reduce the carbon impact of their project. This approach may be accompanied by a label (e.g. Circolab) or be part of GSE's eco-responsible building approach.

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 assists clients who wish to obtain environmental certifications (e.g. HQE, BREEAM, LEED, DGNB), specific energy labels that go further than local regulations or via GSE's eco-responsible building approach, in order to construct efficient buildings, thanks to their high-performance envelope, low energy consumption, renewable energy production and building management during the operating phase.

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 hydrogeological characteristic.

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 the ecologist's recommendations, if any.
- anticipating risks when phasing construction work.
- limit pollution and wastewater discharges during the construction phase.
- combat erosion, manage surface run-off and treat sediments.
- aim for 100% infiltration of rainwater as soon as local conditions allow.

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 as far as possible to limiting the artificialization of land, in particular by :

- qualifying the nature of the land sourced by GSE's CONFLUENCE subsidiary or proposed by the customer (ENAF, previously developed land, wasteland, biodiversity issues on the land, etc.).
- developing projects to renovate and/or redevelop brownfield sites, in order to limit the use of undeveloped land with a high biodiversity value.
- making buildings denser, thinking about complementary uses or making buildings more vertical (high-rise buildings, multi-storey warehouses) to limit the floor area of buildings.
- studying the possibilities of using permeable materials to avoid run-off phenomena.

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.
- qualify the nature of the land sourced by GSE's CONFLUENCE subsidiary or proposed by the customer (ENAF, previously developed land, wasteland, biodiversity issues on the land, etc.)
- develop projects to renovate and/or redevelop brownfield sites, to limit the use of undeveloped land with a high biodiversity value.
- offer our customers a project design that takes account of the biodiversity issues involved in the project, particularly species conservation issues.
- propose multi-layered landscaping projects adapted to the development of biodiversity, and planting 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

04

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.

Everyone must be vigilant for themselves, those around them, their team or any person placed under their responsibility.

Each employee participates in the continuous improvement of the risk management system, facilitating the identification and handling of malfunctions.

Everyone contributes carefully and diligently to the investigations, reviews and audits carried out as part of the internal control system.

Any employee who observes or suspects a current or future violation of this policy must inform the Ethics Officer.

GSE has set up an internal control system for the company's various functions and carries out audits of its processes.

Any obstruction of the proper performance of controls and audits, whether by internal departments or third parties (e.g. statutory auditors), as well as any concealment of information in this context, are prohibited and would constitute serious breaches 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.

An ethic committee of six 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 Risk Management and Audit	Magalie HENGY	+33 (0)4 90 23 85 25	mhengy@gsegroup.com
Ethics Officer	Mario MILANESI	+33 (0)4 90 23 85 56	mMilanesi@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.

More in GSE's Whistleblower Protection Policy

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 and was updated on February 2025.

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.

In order to ensure that its employees fully understand this charter, GSE has developed an online training course covering all the significant elements of this code.

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

Environmental training is an integral part of employee induction.

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.

