2024 SUEZ SUSTAINABILITY STATEMENT

Contents

The Group is publishing its inaugural Sustainability Statement (hereinafter referred to as the "Sustainability Statement" or "the Statement"), prepared in compliance with Directive (EU) 2022/2464 on the publication of sustainability information by companies (hereinafter "CSRD", Corporate Sustainability Reporting Directive), as transposed into French law in Article L.232-6-3 of the French Commercial Code.

This Sustainability Statement was approved by the Board during the meeting held on April 16, 2025

GENERAL DISCLOSURES (ESRS 2)

1.1. Sustainability governance

1.1.1. The role of the Board of Directors and Executive Management (GOV-1 and GOV-2)

Overview of the Board of Directors

The current SUEZ Group has been created in 2022 after the acquisition of assets by Meridiam, Global Infrastructure Partners and Caisse des dépôts et des consignations/CNP Assurances. The composition of the Board of Directors reflects the shareholding structure of SUEZ, which is a non-listed company, with representatives of the institutional shareholders, employee shareholders and employees.

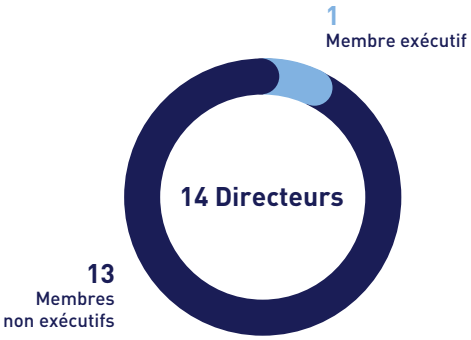
SUEZ shareholders are themselves committed to sustainability and their experiences on all fields (decarbonization, sustainable finance, health and safety, governance...) within their holdings are a great asset to support SUEZ teams:

- **Meridiam** is a leading independent investment **Benefit Corporation** and an asset manager of sustainable public infrastructure, managing globally over US$22 billion and more than 130 projects to date. **Since the foundation in 2005 by Thierry Déau, Meridiam have placed ESG (Environmental, Social, Governance) and sustainability considerations at the heart of its priorities, investments, and strategy.** Meridiam works for people and the planet – designing, financing, developing, and operating **sustainable and resilient infrastructure that improves the quality of people's life over the long term** (a 25-year horizon, or more). They all contribute concretely to the United Nations Sustainable Development Goals (SDGs) by addressing what Meridiam believes are the world's most pressing challenges: building resilient communities, tackling climate change and protecting the environment.
- **Global Infrastructure Partners (GIP)** is a leading global independent infrastructure fund manager with approximately US$170 billion assets under management and a diversified portfolio of **more than 300 active investments in over 100 countries.** GIP specializes in investing, owning and operating some of the largest and most complex assets across the energy, transportation, digital infrastructure and water and waste management sectors. GIP believes that r**especting environmental, health & safety, labor, social, governance, and business integrity considerations** underpins GIP's license to responsibly own and operate large-scale, critical national and economic infrastructure that create **positive economic impact for communities across the globe. Decarbonization** is an important part of GIPs investment thesis, and GIP believes it is well positioned to facilitate the global **energy transition**, capitalizing on its leadership in renewables, expertise in midstream and transport. GIP is committed to adopting ESG and decarbonization best practices and was an **early supporter of the United Nations Principles for Responsible Investment** (UNPRI).
- The **Caisse des Dépôts Group's** purpose is to form a **unique alliance of public and private players committed to accelerating the ecological transformation and contributing to a better life for all.** The Group's sustainable strategy is designed to meet a dual objective:
  - to increase the Group's contribution to public policies and, more generally, **to activities with high environmental and social added value,**
  - to minimise the **risks and negative impacts** that cut across all our activities through our policies on environmental, social and governance issues.

A pioneer in responsible investment, Caisse des Dépôts has been a signatory of the United Nations Global Compact and the Principles for Responsible Investment (PRI) since their creation in 2000 and 2006 respectively. It is also a founding member of the Net-zero Asset Owner Alliance (NZAOA) in 2019, which brings together institutional investors committed to achieving carbon neutrality in their asset portfolios by 2050. Caisse des Dépôts' extra-financial performance is recognised by the rating agencies, which rate it among the sector leaders. For example, it was given an ESG AA rating by MSCI in 2024.

- With €400 billion in assets under management, **CNP Assurances'** purpose is to act as a responsible insurer and investor, placing **sustainability at the heart of its priorities.** A signatory of the **Principles for Responsible Investment** in 2011, CNP Assurances joined the **Net-Zero Asset Owner Alliance** in 2019. The Group adopts a transparent approach to its commitments and achievements, which are published, among other things, in its own CSRD report.

Composition and diversity of the Board of Directors and management body



In 2024, the Board of Directors comprised fourteen directors, including:

- the Chairwoman & Chief Executive Officer (executive member) (until 31 December 2024);
- 10 members appointed by shareholders (non-executive members);
- 2 directors representing SUEZ employees;
- 1 director representing SUEZ employees' shareholders.

Since the creation of the current SUEZ Group in 2022, the functions of Chairman of the Board and CEO (Chief Executive Officer) have been separated. By exception, until 31 December 2024, the CEO was also Chairwomen of the Board. Since 1 January 2025, the functions are again separated.

29% of the Board members are women. In application with the regulations, the objective is to increase the gender diversity within the Board during the next years.

In accordance with its internal regulations, the Board of Directors has set up three specialist Committees, in which directors participate following their expertise:

- Audit and Risk Committee;
- CSR (Corporate Social Responsibility) Committee;
- Appointments and Remuneration Committee.

The roles of those Committees regarding Sustainability (Environmental, Social, and Governance) topics are detailed hereafter. It should be noted that only the Audit and Risk Committee and the CSR Committee have a specific role and competence in the area of sustainability.

Directors are individually presented hereafter, including management body at SUEZ, that is represented by its Chairwoman and Chief Executive Officer Sabrina Soussan (resigned from the Board of Directors on 31 December 2024, and as Chief Executive Officer on 31 January 2025).

This table represents composition of the Committees for the year 2024.

Name	Position	Main functions and significant mandates outside the Group	Audit and Risk Committee	CSR Committee	Appointments and Remuneration Committee
Sabrina Soussan	Chairwoman and Chief Executive Officer (resigned from the Board of Directors on 31 December 2024, and as Chief Executive Officer on 31 January 2025)	• Director of The Boeing Company			
Thierry Déau	Director (appointed Chairman of the Board as of 1 January 2025)	• Chairman of Meridiam Infrastructure Partners and Meridiam SAS • Member of the Executive Committee of Autostrada Wielkopolska S.A., Autostrada Wielkopolska II S.A. and Concessao de Auto-Estradas, S.A. • Chairman of the Supervisory Board of SOF Connect AD • Director of Allego BV • Director of Evergaz S.A. • Chairman of Centrale Électrique de l'Ouest Guyanais SAS • Chairman of Vélopolis SAS • Director of Bulldog Infrastructure Group, LLC and New Energy One, LLC			Chairman
Xavier Girre	Director	• Executive Director in charge of Performance Impact, Investments and Finance of EDF • Board member at FDJ (and Chairman of the Audit Committee and member of the CSR Committee)	Member	Chairman	
Sinan Durmaz	Director	• Senior Investment Director at Meridiam			
Antoine Lissowski	Director	• Board member at Elsan (and Chairman of the Audit Committee) • Chairman of the Supervisory Board of SACRA	Chairman		
Deepak Agrawal	Director	• Partner at GIP • Board member of Skyborn Renewables • Board member of Vena Energy			Member
Judith Hartmann	Director	• Operating Partner at Sandbrook Capital • Non-executive director of Marsh McLennan (member of CSR Committee, Audit Committee, Finance Committee)			

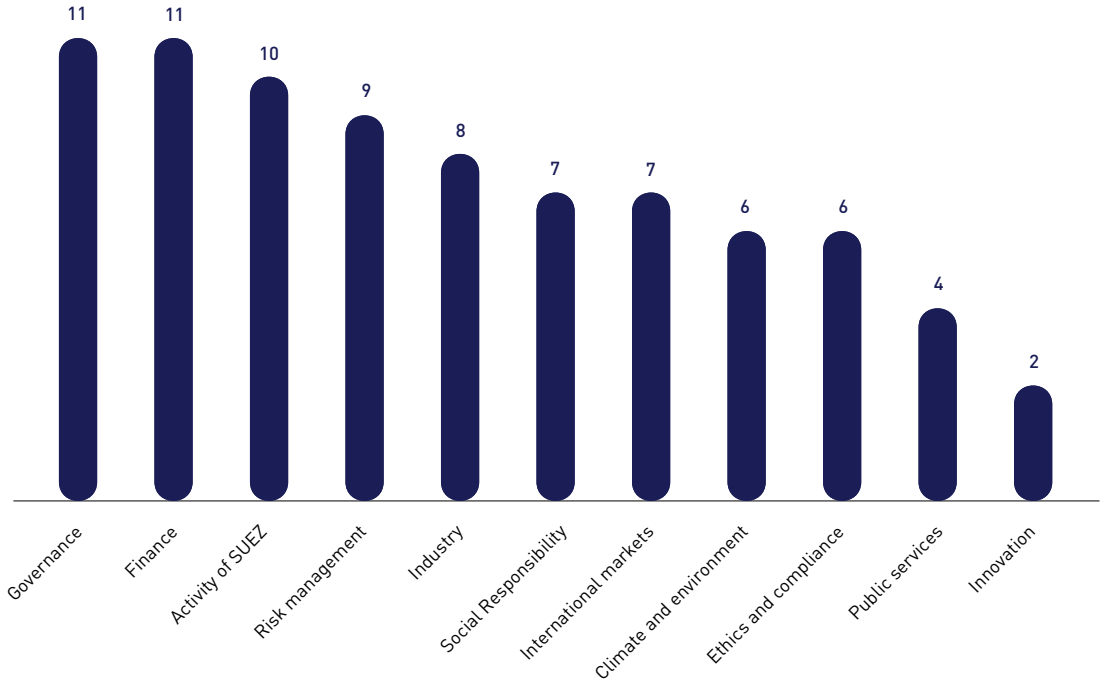
Name	Position	Main functions and significant mandates outside the Group	Audit and Risk Committee	CSR Committee	Appointments and Remuneration Committee
Antoine Kerrenneur	Director	• Partner at GIP	Member	Member	
Kenji Hashimoto	Director	• Managing Director and Portfolio Company Chief Financial Officer at GIP • Member of Board of Directors at CyrusOne (and Chair of Audit/Risk Committee)	Member		
Antoine Saintoyant	Director	• Member of the Executive Committee of Caisse des dépôts et consignations • Interim Executive Director of Banque des Territoires • Board member of Bpifrance S.A. • Board member of Compagnie des Alpes S.A. (and member of the Strategic Committee and CSR Committee) • Member of the Supervisory Board of La Banque Postale S.A. (and member of the strategic and CSR Committee) • Board member of La Poste S.A.	Member		Member
Sarah Bouquerel	Director	• Director of La Banque Postale Business Unit and member of the Executive Committee of CNP Assurances • Deputy general manager of retail banking and member of the Executive Committee of La Banque Postale • Chairwoman of the Board of Directors of CNP Assurances IARD • Chairwoman of the Board of Directors of CNP Assurances Prévoyance • Chairwoman of the Board of Directors of CNP Assurances Santé Individuelle • Member of the Board of Directors of La Financière de l'Échiquier (and member of the Audit & Risk Committee)		Member	
Jérémy Chauveau	Director representative of employees	None			Member
Marie-Anne Sparks	Director representative of employees	None		Member	
Christophe Le Roy	Director representative of employee shareholders	None	Member		

Expertise and skills of Directors and management body

The Board ensures that its membership and that of its Committees is balanced, particularly in terms of diversity (international experience, skills, etc.).

All Directors have a wide range of skills and experience, acquired throughout their professional careers aligned with activity and strategy of SUEZ. SUEZ is fortunate to have a Board of Directors with a wide range of skills, as shown in the table below. When it comes to sustainability issues, many of its members have relevant skills to nurture the Group strategy in the areas of climate and the environment, social responsibility or ethics and compliance. In addition, some of the Directors are executives of listed compagnies and companies subject to the CSRD and are therefore aware of and trained in this area. By virtue of their profile and experience, some Directors are also aware of the challenges of governance and in public services sector and international markets.

Competency matrix - Board of Directors



Focus on sustainability expertise, skills and training of Directors, including management

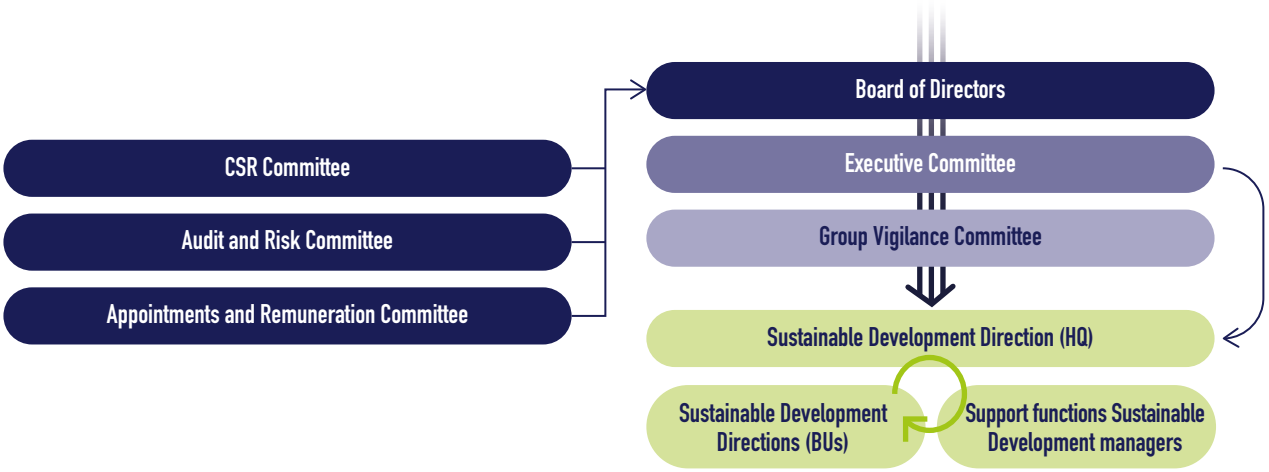
All Directors have benefited from a training session dedicated to CSRD, to present the new European framework in which the CSRD fits, its main principles (concepts of double materiality, standardisation, etc.), the opportunities and challenges brought by this new regulation, the role played by governance, and to present the main stages of compliance and the various projects launched by the teams.

Also, during their sessions, Committees can call on external experts if necessary and the Committee Chairman can request a hearing from any manager within the Group with a dedicated sustainability expertise to assist the Committee.

Sustainability matters addressed by management

To support the implementation of the Sustainable Development Ambitions and Commitments 2023-2027, as well as of the Sustainability Statement, and to ensure all other projects on Environment, Social and Governance (ESG) topics, SUEZ has defined a Sustainability Governance Structure, presented as follows.

As detailed hereafter, the Board of Directors and its specialist Committees, namely the Audit and Risk Committee and the CSR Committee, are kept informed of sustainability issues by the Executive Committee.



Board of Directors oversight

The Board of Directors plays a crucial role in overseeing sustainability efforts. It sets the overall strategic direction, reviews and approves sustainability policies, initiatives and targets, and ensures alignment with the Company's long-term goals and shareholder interests. The Board of Directors is responsible for overseeing the Company's sustainability reporting process, including the Sustainability Statement, on an annual basis at least and on *ad hoc* sessions. It also validates the remuneration scheme for top management, which includes ESG components, on an annual basis.

CSR (Corporate Social Responsibility) Committee

The CSR Committee plays a pivotal role in overseeing and guiding SUEZ Sustainable Development programmes. The Committee oversees the allocation of resources, to support the Sustainable Development Ambitions and Commitments. It reviews the implementation of the Sustainable Development Ambitions and Commitments on a quarterly basis, as well as the Vigilance Plan on an annual basis. The Committee is responsible for validating sustainability targets and reviewing progress and action or mitigation plans quarterly. It also reviews the definition and weighting of SUEZ material IROs (Impacts, Risks and Opportunities) and validates the Sustainability Statement annually. The CSR Committee challenges and assesses the CSR components in remuneration schemes of top management and provides analysis and recommendations to the Board of Directors on sustainability issues, on an annual basis.

The Audit and Risk Committee

The Audit and Risk Committee ensures that the Sustainability Statement complies with the requirements of the CSRD and the ESRS standards. It verifies that ESG data is reliable, accurate and consistent with current standards. The Audit and Risk Committee is responsible for appointing and supervising the external auditor responsible for verifying the sustainability data (limited or reasonable assurance under the CSRD). It assesses ESG risk management mechanisms and their integration into the Company's overall risk management framework. The Committee ensures that the systems and procedures for collecting, analysing, and reporting sustainability data are robust and well-documented. This is realized on an annual basis.

Executive Committee

The CEO and executive leadership team are responsible for championing sustainability within the organisation, establishing leadership and direction at the highest levels, and integrating sustainability considerations into strategic decision-making processes. The Chief Sustainability Officer, under the direct authority of the CEO, is in charge of defining, validating and rolling out the Sustainable Development strategy. The Executive Committee ensures that the Company's strategic goals are aligned with the CSRD's sustainability reporting requirements and the ESRS. It oversees the quality and accuracy of data collected for ESG reporting, ensuring consistency and reliability. The Committee has contributed to and validated the different steps leading to the CSRD report, including the double materiality analysis. It develops and enforces policies that guide the Company's sustainability efforts and compliance with the CSRD. Executive Committee reports to the Board of Directors and its specialized Committee on a regular basis depending on topics to be addressed.

Sustainable Development Direction

A dedicated Sustainable Development Direction is responsible for the implementation of the Sustainable Development strategy across all operations and is organised around the three pillars of the Sustainable Development Ambitions and Commitments 2023-2027 (Climate, Nature, Social). The direction identifies key ESG priorities aligned with the Company's business strategy and CSRD requirements. It ensures compliance with CSRD requirements, identifies gaps in current reporting and management processes relative to CSRD standards, and proposes corrective actions. The direction is responsible for data collection and management from various directions (e.g., Human Resources, Finance, Operations) for sustainability reporting. It leads the preparation of sustainability reports, ensuring alignment with CSRD and ESRS disclosure requirements in coordination with other directions and Business Units. The direction provides insights and data to the Board of Directors, CSR Committee, and Audit Committee to inform decision-making and governance, on a quarterly basis. It is supported by a Sustainable Development network with correspondents in all Business Units, responsible for the local implementation of the Sustainable Development Ambitions and Commitments 2023-2027.

For the current year, the list of 24 ESG commitments and 50 material IROs has been reviewed and validated by the Executive Committee, the CSR Committee and the Audit and Risk Committee for the first Sustainability Statement. More detailed information on these ESG issues and material IROs is provided in » section *1.3.2 Double materiality assessment results* of this statement.

1.1.2. Sustainability-related incentive schemes (GOV-3)

In line with SUEZ Sustainable Development ambitions and commitments, incentive schemes integrate sustainability components for the Chairwoman and Chief Executive Officer. The Company has decided to extend these criteria to the remuneration of the Executive Committee.

Short-term incentives of the Chairwoman and Chief Executive Officer are structured as follow:

- 60% based of financial criteria;
- 10% based on key projects;
- 30% based on ESG targets: 10% on Health and Safety, 10% on Climate and 10% on Employees engagement.

For 2024, the ESG indicators, targets and achievements are the following:

ESG Targets	%	Indicators	2024 targets	2024 achievements	2024 achieved % in STI
Health and Safety	5	Frequency rate Severity rate Completion of Business Units action plans	5.9 0.42 100%	5.58 0.46 104%	Non applicable [1]
	5	Number of fatalities	0	1	
Climate	10	Scope 1 & 2 (market-based) greenhouse gas (GHG) emissions reduction	-2.1% GHG emissions compared to 2023	-4.8% [2]	
Employees engagement	10	Engagement rate compared to the external benchmark (PULSE)	Stable or improved rate	Improved (67%, +9 point above benchmark)	
TOTAL	**30%**				

(1) Sabrina Soussan resigned from the Board of Directors on 31 December 2024, and as Chief Executive Officer on 31 January 2025.

(2) This percentage reflects the evolution based on SUEZ consolidated perimeter prior to applying the new CSRD perimeter accounting rules ("operational control"). Under the new accounting rules, the evolution between 2024 and 2023 is -6.2%.

1.1.3. Statement of due diligence (GOV-4)

In accordance with French law no. 2017-399 of 27 March 2017, on the Duty of Vigilance, SUEZ implements measures through its Vigilance Plan to identify and prevent serious negative risks and impacts on human rights, fundamental freedoms, health, personal safety and the environment. These measures concern the Group's activities, upstream and downstream value chain and business relationships.

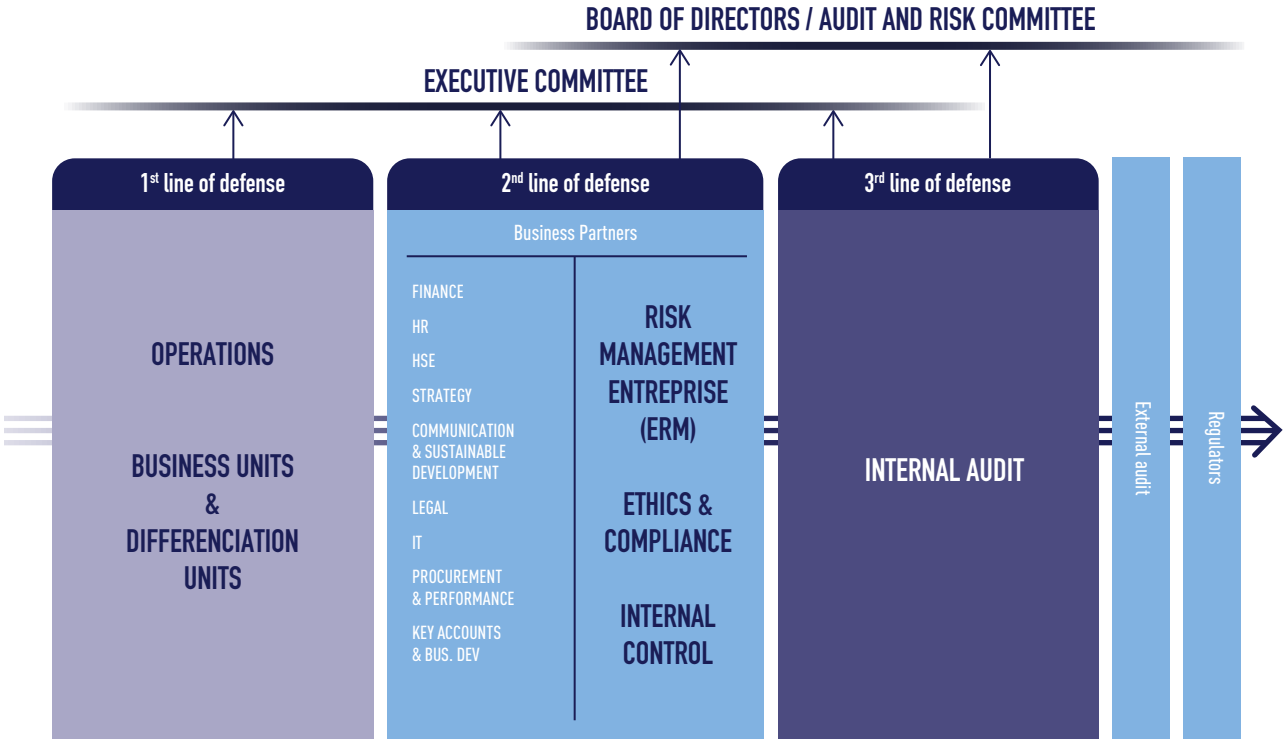
SUEZ has established a Group governance structure for its Duty of Vigilance . The implementation of this system is described in the Vigilance Plan.

Essential elements of due diligence	Paragraphs in the sustainability statement
a) Integrate due diligence into governance, strategy, and business model	Refer to paragraphs: • ESRS 2 GOV-1, GOV-2 §1.2.1 • ESRS 2 GOV-3, §1.2.2 • ESRS 2 SBM-1 §1.3.1
b) Collaborate with relevant stakeholders at all stages of due diligence	Refer to the following paragraphs: • ESRS 2 SBM-2 §1.3.2 • ESRS 2 IRO-1 §1.4.1 • S1 – SBM-2 §8.1.1. • S2 §9.1.1 • S3 §10.1.1 • S4 §11.1.1 • G1 §12.1.2
c) Identify and assess negative impacts	Refer to the following paragraphs: • ESRS 2 IRO-1 §1.4.1 • ESRS 2 SBM-3 §1.4.2 • E1 IRO-1 §2.3.1 • E2 IRO-1 §3.1.2 • E4 IRO-1 §5.2.1 • S1 – SBM-3 §8.1.2 • S2 – SBM-3 §9.1.2 • S3 – SBM-3 §10.1.2 • S4 – SBM-3 §11.1.2
d) Take measures to remedy these negative impacts	Refer to the following paragraphs: • E1-2 §2.3.2, E1-3 §2.3.3 • E2-1 §3.1.3 & E2-2 §3.1.4 • E4-2 §5.2.2 & E4-3 §5.2.3 • S1-1 §8.2.1, • S2-1 §9.2.1, S2-3 §9.2.3, S2-4 §9.2.4 • S3-1 §10.2, S3-3 §10.4, S3-4 §10.5 • S4-1 §11.2.1, S4-3 11.2.3, S4-4 §11.2.4 • G1-3 §12.1.4
e) Monitor and communicate the effectiveness of these efforts	Refer to the following paragraphs: • E1-3 §2.3.3, E1-4 §2.4.1 E1-5 §2.4.2, E1-7 §2.3.5 and E1-8 §2.3.6 • E2-3 §3.2.1, E2-4 §3.2.2, E4-3 §5.2.3 to E4-4 §5.3.1 • S1-3 §8.2.3, S1-4 §8.2.4, S1-5 §8.3 • S-2-2 §9.2.2, S2-4 §9.2.4, S2-5 §9.3 • S3-4 §10.5, S3-5 §10.6 • S4-3 §11.2.3, S4-5 §11.3

1.1.4. Risk management and internal controls over sustainability reporting (GOV-5)

SUEZ is structured around Business Units and Differentiation Units, to which operational entities report. The management of each business segment is responsible for ensuring that operations are aligned with the strategic objectives defined by the Executive Committee and shareholders. Business Partners assist General Management in defining norms and standards, ensuring compliance with the strategic objectives set by the Board of Directors and General Management.

As illustrated below, the internal control and risk management systems of SUEZ are structured across three lines of defence: operational entities, business partners, and internal audit.



Model introduced by the IIA – The Institute of Internal Auditors.

Within this framework, internal control is a process designed to provide reasonable assurance that ESG information and data (policies, processes, and targets) are produced, collected, and reported accurately. The internal control framework aims to anticipate, prevent, and better manage the Group's various operational, financial, and compliance risks.

The main risks identified in sustainability reporting are the completeness and accuracy of the information. To mitigate these risks, the Internal Control Direction has developed a methodology and dedicated controls, such as:

- standard data definitions and formulas available for business functions to ensure consistent reporting across SUEZ entities;
- local control procedures for ESG data reported in information systems, involving local checks and approval workflows before integration into the holding tools or the sustainability statement;
- central control procedures on ESG data to secure overall consistency and completeness during data consolidation and report preparation;
- internal control involvement in risk identification and control to ensure compliance with CSRD requirements in each relevant domain.

Given the large volume of data to be implemented in the Sustainability Statement, SUEZ applied a prioritisation method to stagger internal controls over the next three years. As such, the most critical data for the Company have been prioritised, such as indicators included in the *Sustainable Development Roadmap 2023-2027*, compensation packages, or those related to topics with high DMA (double materiality assessment) scores. This three-year action plan is still under construction.

After the validation of the internal control strategy, SUEZ will test and implement these ESG data controls according to the defined plan. Continuous monitoring and communication of key findings to SUEZ management are addressed twice a year as part of the Audit and Risk Committee.

1.2. Business model and strategy

1.2.1. Strategy, business model and value chain (SBM-1)

Purpose

In September 2022, SUEZ adopted its purpose and included it in its by-laws in 2023. This purpose is a North star, driving and guiding SUEZ 40,000 employees in their actions. It reflects the Group's contribution to society, and the reason of existence.

"Faced with growing environmental challenges, each day, for more than 160 years, we have been acting in support of our clients and partners to deliver essential services that protect and improve the quality of life wherever we operate. United by a passion for our work as well as our inclusive culture and team spirit, we innovate to conserve water and create value from waste, in the form of recycled materials and energy. We promote and implement responsible behaviours, more efficient technologies and circular solutions to recycle and make the best possible use of the finite resources of the Earth. Deeply rooted in our communities, we are committed to providing people and the planet with the resources for a common future."

Core business

SUEZ core business is to deliver essential services to improve the quality of life. Its water and waste businesses are deeply rooted in communities. By recovering waste in the form of new materials or energy and by giving wastewater a second life, SUEZ activities contribute to developing a more circular economy, developing strategic autonomy, and regional resilience for its clients. By treating water to make it safe for the natural environment, the Group helps to protect biodiversity. By creating alternative water resources through desalination or wastewater reuse, it is taking action to ensure availability and preservation of freshwater resources for citizens and industries. SUEZ also contributes to community decarbonisation targets and energy independence by producing energy from wastewater or waste. In 2024, across its entire value chain, SUEZ provided drinking water to 68 million people worldwide (46 million under CSRD accounting rules) and sanitation services to over 44 million people (39 million under CSRD accounting rules) in 40 different countries. The Group generated 8.1 TWh of energy from waste and wastewater (6.4 TWh under CSRD accounting rules).

SUEZ ambition is to contribute directly or indirectly (i.e., enabling/accelerating its customers' ambitions) to the world's most pressing needs in ecological transition, namely:

- accelerating the decarbonisation efforts to combat climate change;
- retrieving and treating potential sources of pollution to limit and reduce the impact on biodiversity;
- driving the saving and creation of scarce resources (water, metal, etc.) to limit and decrease human impact on the environment.

By their nature, SUEZ core businesses are at the heart of sustainable development challenges. However, the planet is facing an unprecedented loss of biodiversity and natural resources. The latest IPCC (Intergovermental Panel on Climate Change) report highlights how the consequences of climate change are materialising faster than society's ability to adapt to them. It is increasingly clear that these two crises – climate change and the decline of natural capital and associated biodiversity – are intrinsically linked. Their consequences primarily affect the most vulnerable. Now more than ever, the challenges of sustainable development – impacting climate, nature and social factors – are interdependent. This is why the Group has defined its *Sustainable Development Roadmap 2023-2027*, which addresses each of these pillars with the same level of ambition. This Roadmap aims to strengthen and expand SUEZ positive contribution through 24 operational commitments that are specific, achievable, and measurable. On top of these 24 commitments, the contribution to the *Sustainable Development Roadmap* is reviewed for any new major investments, whether in infrastructures and/or services, and complementary to economic criteria.

SUEZ is organised into two separate divisions: Water and Waste, which operate distinctly and/or with synergies, driven by innovation:

- across divisions when relevant: common customers, joint approaches to business and operations, integrated value chain between both divisions, e.g., water sludges treated in the organic waste processes like anaerobic digestion or incineration;
- across countries to optimise volumes and processes and share best practices in and across different countries.

This cross-division approach is supported by Differentiation Units, at Group level, such as Digital Solutions and Engineering & Construction, which leverage innovation, function and operational feedback from both divisions to cross-fertilize practice-sharing across the Group.

Across the two divisions and Differentiation Units, SUEZ applies three key principles as a competitive advantage:

- value creation with and for its clients and partners;
- differentiation from low-tech alternative offers;
- leveraging the Group's expertise in Waste and Water.

SUEZ leverages its technical expertise as a solution provider, specializing in infrastructure and services. The Company possesses in-house capabilities, supported by a network of partners, to manage all or part of the water and waste treatment value chain. This includes designing and engineering facilities, overseeing procurement with both internal and external resources, constructing infrastructure, and providing ongoing operation and maintenance services for clients. SUEZ may operate on behalf of its clients through delegation from public entities, in the capacity of a subcontractor, or under a merchant model, wherein it functions fully independently.

Leveraging a strong historical foundation in France, along with an expansive international presence spanning 40 countries across Europe, the Americas, Africa, the Middle East, and the Asia-Pacific region – including China – SUEZ is strategically positioned to lead in innovation. The Group not only replicates but also tailors proven best practice solutions to diverse global contexts, ensuring that these initiatives have a measurable and substantial impact, with results that are both tangible and continuously assessed. These differentiating advantages and assets include patented technology solutions, digital and artificial intelligence-based offers, and customer service applications that can be applied and adapted to both its Water and Waste clients.

SUEZ primarily establishes and maintains business relationships with government entities, including local, regional, and national levels, as well as municipalities, regional councils, national utilities, and ministries. The Group also serves a diverse range of industrial clients, spanning various geographies, industrial sectors, and business sizes. SUEZ also engages in business-to-consumer activities, maintaining both commercial and technical relationships with individual homeowners. In its Water division, SUEZ primarily serves municipal clients, with individual customers as a secondary focus. In the Waste division, the Company works with a diverse mix of public and industrial clients. A key commercial strength of SUEZ is its ability to foster strong, long-term relationships at local, national, and international levels.

SUEZ does not generate direct revenues from fossil fuel-related activities but may support companies in this sector by assisting them in minimising their environmental impact. While SUEZ does not produce chemicals, it may utilise them in its water and waste treatment processes. Additionally, the Company plays a role in retrieving potentially harmful chemicals, including PFAs (per- and polyfluoroalkyl substances), through its operations. In both the Water and Waste divisions, SUEZ is able to commit to specific volumes, quality standards, service availability, and other parameters to ensure continuous access to resources for its clients and customers.

Primary activities

In 2024, the Group recorded almost €9.2 billion in revenue, with the following geographical distribution: 59% in France and 41% internationally. 38% of this revenue was generated in the water market and 62% in waste management.

Water activities

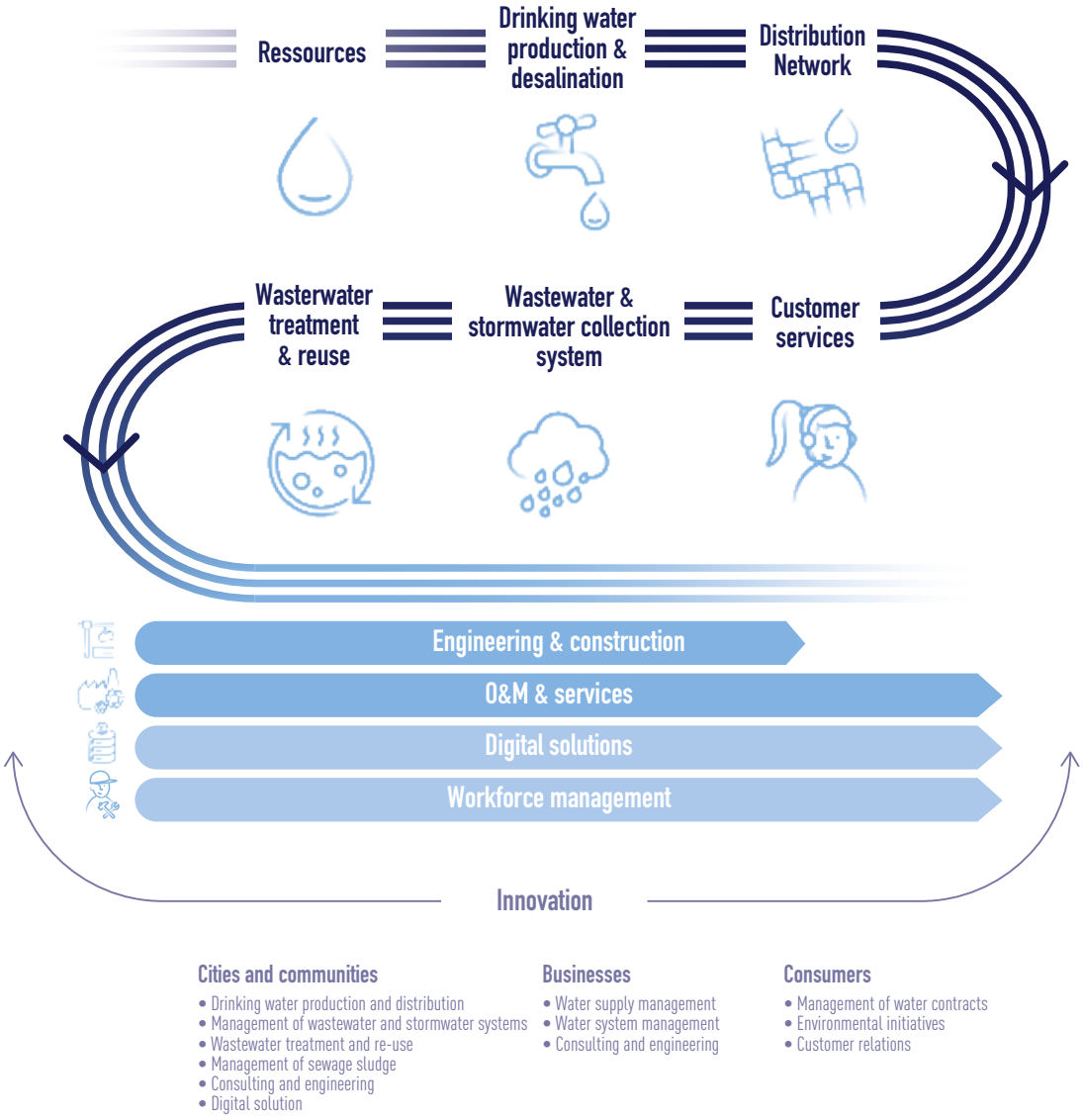
In 2024, across its entire value chain, the Group operated around 900 drinking water production sites (860 under CSRD accounting rules) , producing around 4.5 billion m^3 of drinking water (3.0 billion m^3 under CSRD accounting rules). It also operated almost 2,200 wastewater treatment sites (2,160 according to CSRD accounting rules) and biologically treated 3.0 billion m^3 of wastewater (2.5 billion m^3 according to CSRD accounting rules). Specifically, SUEZ specialises in the design, construction, and operation of water infrastructure, covering two main areas:

- **incoming water:** this includes the provision of potable water for individual and municipal clients, as well as process water for industrial applications. SUEZ sources water from various natural bodies such as rivers, lakes, groundwater, and seawater, employing desalination processes when necessary. The Company manages the transportation, purification, and final distribution of water to consumers and businesses, either directly or through public entities and water networks;
- **outgoing water:** this refers to wastewater, which may be contaminated to varying degrees. SUEZ is involved in collecting, treating (both mechanically and chemically), and transforming polluted water into reusable resources. The Company recycles treated water for the same or new uses or safely reintroduces it into the environment.

As a solution provider and infrastructure expert, SUEZ has the capability to design, construct, and maintain water treatment plants and piping networks for both drinking water and wastewater. The Company ensures the delivery of high-quality, secure water resources to human populations in conformity with existing regulations, as well as to agricultural, industrial, and service sectors across the economy, thereby supporting life on Earth

Additionally, SUEZ provides technological and digital means to manage and operate those fleets of infrastructure scattered around the globe. To adapt to the need to limit the impact of human activities on the environment, SUEZ is accelerating its strategic focus on providing and treating industrial water, in addition to municipal water. This wide water offer enables public services to provide clean water to their populations and industrial and services companies to pursue their operations, leading to a very high level of client satisfaction (e.g., materialised in 2024, by a record level of 98% of contract renewals).

WE MANAGE THE ENTIRE WATER VALUE CHAIN



Cities and communities

- Drinking water production and distribution
- Management of wastewater and stormwater systems
- Wastewater treatment and re-use
- Management of sewage sludge
- Consulting and engineering
- Digital solution

Businesses

- Water supply management
- Water system management
- Consulting and engineering

Consumers

- Management of water contracts
- Environmental initiatives
- Customer relations

Waste activities

In 2024, across its entire value chain, the Group processed almost 32.4 million metric tons of waste (30.1 million according to CSRD accounting rules) and served around 13.1 million people and around 65,000 customers in the service and industrial sectors through its waste collection activities (identical orders of magnitude for CSRD accounting rules). The Group also operated 58 composting platforms, 45 incineration sites, 479 material sorting, recovery, and transfer stations, and a fleet of 5,320 heavy vehicles (respectively 57, 38, 472 and 5,230 according to CSRD accounting rules).

In the Waste area, SUEZ can design, build and operate/service infrastructures covering the full value chain:

- collection of waste, thanks to a large workforce and a significant fleet of specialised vehicles, in a wide array of collection points, at individual, collective, or industrial levels, with adapted processes and vehicles based on the type of waste collected;
- aggregating collected waste into larger volumes to proceed to sorting and prepare for the next steps of processing, based on the type of waste;
- directing each type of waste to the corresponding treatment process: recycling and valorisation as much as possible, incineration, dedicated ultimate waste processing for hazardous waste or non-hazardous waste in dedicated landfilling infrastructures.

As a solution provider and an expert in infrastructures, SUEZ can design, construct and maintain waste collection, sorting and treatment/landfill sites, to support individual and industrial activity while minimising environmental impact.

As such, SUEZ provides technological and digital means to manage and operate those fleets of infrastructure scattered around the globe. To support the preservation of the environment and the ecological transition, SUEZ is accelerating the development of advanced recycling and recovery methods while limiting landfilling volumes.

These waste activities help municipalities, customers, and corporate clients continue their operations while minimising potentially harmful environmental impacts.

SUEZ MANAGES THE ENTIRE WASTE VALUE CHAIN

Value chain

As an integrator of environmental technologies and solutions, SUEZ collaborates with more than 55,000 suppliers and subcontractors around the world with €5.5 billion in annual expenditure. 76% of the Group's purchases are done in France, 13% in the rest of Europe, and the remainder internationally.

Additionally, most of the value created by the Group's activities benefits local economic players: around 90% of the economic flows generated by the Group's activities are redistributed to its employees, subcontractors, and suppliers, as well as to governments, NGOs, and local communities. SUEZ is a reliable partner throughout the value chain, collaborating with key industry players, including CMA CGM in shipping and Renault Group in automotive, to drive strategic decarbonisation efforts.

In this context, SUEZ value chain encompasses all stakeholders involved from the upstream actors providing primary goods to downstream actors benefiting from SUEZ services. It can be described as follows:

Suppliers: SUEZ activities rely on goods and services provided by suppliers. They deliver key materials or components such as energy, chemical products, plant, and maintenance equipment (filters, pumps, turbines, sensors, electricals, networks, etc.) smart meters, building and infrastructure materials, heavy vehicles, and software.

Subcontractors: They contribute to SUEZ operations with technical support (on-site or network work, technical studies) or intellectual services.

Transport and logistics: This part of the supply chain refers to material transportation to SUEZ entities as well as the logistics linked to the treatment of sludge and waste.

SUEZ own operations: These cover water and waste management activities through design, build, operation, and maintenance solutions.

Customers: SUEZ key clients include municipalities, businesses, and industrial entities. Contractual agreements with these clients are primarily established through public or private tendering processes. Clients expect exceptional service delivery, alongside strict adherence to environmental and social standards.

End-users: Citizens are the direct beneficiaries of SUEZ solutions (drinking water and sanitation services) provided by local municipalities.

Local communities: Communities in proximity to SUEZ operations are directly affected by the Company's environmental footprint, including its practices in air, water, and waste management. SUEZ is therefore required to address social considerations, such as community engagement, job creation, and local economic development.

Other indirect activities or interactions complement SUEZ value chain: These involve business relationships such as:

- investment operations: representing indirect activities and including joint venture partnerships, shareholding participations, etc.
- business partners: playing an indirect role in SUEZ value chain through interactions with sector peers, competitors, industrial actors within business federations, trade associations or sectorial organisations;
- regulatory authorities and governments: impacting business processes and practices through evolving regulatory requirements or incentives;
- NGOs and Civil Society Organisations: environmental and social advocacy groups, as well as local NGOs, often provide insights into the broader impacts of SUEZ operations, such as biodiversity, human rights, and community well-being.

1.2.2. Interests and views of stakeholders (SBM-2)

SUEZ incorporates a wide range of perspectives into its decision-making processes and aims to foster dynamic relationships with all stakeholders.

The Group actively considers stakeholder expectations when formulating and executing its CSR strategy, including the development of its double materiality matrix and identification of IROs. SUEZ has established a structured dialogue framework, tailored to each stakeholder category based on their specific expectations and challenges. This dialogue, overseen by the relevant directions responsible for each ESG issue, facilitates the communication of policies and action plans, as well as nurturing Group strategy evolutions, while also enabling the Group to assess their effectiveness and alignment with stakeholder needs. Each direction oversees informing Executive Committee of main outputs of this dialogue with stakeholders.

Stakeholders	How engagement is organised	Purpose of engagements	Main Directions involved
Employees	• Employment relations and occupational health and safety representation • Employees Board members, selected by the European Work Council and the Comité de Groupe France • Personal development programmes & dialogues • Regular workplace assessments and surveys	• **Social dialogue systems** cover 94.4% of employees (94.3% of FTEs) and promote a better understanding of the issues, expectations, and concerns of all the parties involved. These dialogues are initiated during dedicated governance bodies. • **Bottom-up communication channels** enable employees to share feedback via several methods: large scale surveys, HR annual reviews, Q&A webcasts. Exchanges with employee representatives can feed European, Group-level or local-level labour agreements. Exchanges with employee representatives can also inform management for strategic decisions.	• All functions • Human Resources • Communication
Suppliers and subcontractors	• Suppliers due diligence • Workshops and collaboration with industry actors • Human rights and on-site assessments for high-risk suppliers	• **Information gathering on new suppliers** during the tendering process to evaluate and analyse suppliers' profile and identify potential risks. • **Identification of high-risk suppliers** and **introduction of questionnaires and audits.** Potential human rights and health and safety incidents and environmental hazards are specifically addressed and tracked to ensure risks are under control. Frequency of those assessments differs depending on the risk level of the supplier. Non-compliance cases by a supplier can lead to contract suspension.	• Procurement • Sustainable Development • Legal • Operations
Customers and end-users	• Customer support and guidance • Periodic performance reviews • Business partner due diligence	• **Continuous communication** between customers and end-users, and SUEZ to report complaints or incidents caused by SUEZ operations or issues related to contracts or billing matters. These interactions are managed by the Company's Customer Service Direction, along with local Operational units for cases needing a field-intervention. • **Customer surveys** are collected to measure and track customer and end-user satisfaction. The views of clients and end-users can be addressed by enhancing the robustness of SUEZ standards and processes to better meet stakeholder expectations and prevent risks through multiple levers: increased operational efficiency, leveraged quality of services, minimized negative impacts regarding human rights or health and safety or improved reactivity in the case of incidents.	• Customer service • Sales

Stakeholders	How engagement is organised	Purpose of engagements	Main Directions involved
Local communities	• Public meetings and consultations • Partnerships for community benefits	• **Consultation of local communities before building projects** to collect their views on potential negative local impacts. • **Long-term dialogue during the operational phase** of SUEZ contracts. This can be performed with local surveys or working groups supervised by local authorities. The views of local communities can be considered to challenge or negotiate the components of future construction projects led by SUEZ. Regular dialogue with communities also aims to take action to minimize negative impacts on the well-being of local residents and guarantee strict respect for human rights.	• Sustainable Development • Operations
Financial community and shareholders	• ESG ratings • Investor calls, emails, and exchanges • Periodic investor updates • Dedicated investor presentations • General assembly (on paper)	• **Board Committees** to approve and review sustainability policies and initiatives. Investors and shareholders may be concerned with financial risks related to climate change, resource scarcity, or waste management policies. The views of financial stakeholders can have strong impact on decision-making and may lead to iterations until a better alignment is reached.	
Business partners	• Joint initiatives and programmes • Workshops and knowledge sharing	• Business meetings. • Trainings and global awareness.	• Operations
Regulatory Authorities and Governments	• Direct dialogue with policymakers • Answering public consultations • White papers, programmes, and studies	• Contribution to regulations design and changes through call for contribution at EU or national levels. • Regular meetings with policy makers.	• Public Affairs • Legal
NGOs and Civil Society Organisations	• Direct dialogue with NGOs on the Group's impacts • Partnerships • Adhesion to international standards	• Contribution to international events on sustainability-related topics (Water summits, COP). • Active participation to international associations (OECD Water governance, UN Global compact, etc.).	• Sustainable Development • Health and Safety • Operations

1.3. Double materiality assessment

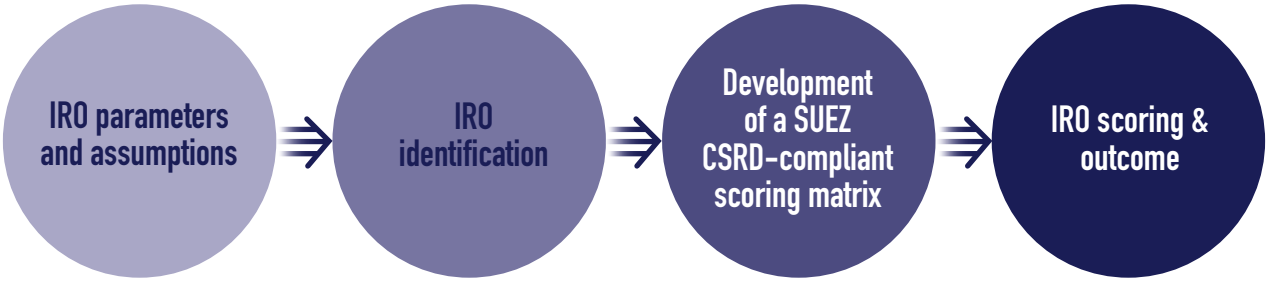
1.3.1. Double materiality assessment process (IRO-1)

The publication of the Corporate Sustainability Reporting Directive (CSRD) in 2023, which builds upon the Non-Financial Reporting Directive (NFRD) introduced in 2014, represents a critical advancement in the European Union's efforts to enhance corporate accountability and transparency in relation to sustainability performance. The CSRD was proposed as an integral part of the European Green Deal and the European Commission's Sustainable Finance Action Plan, positioning it as one of the key mechanisms for driving long-term, sustainable business practices across industries. A core element of this report is the principle of double materiality, which guides the assessment of sustainability matters from two distinct, yet complementary, perspectives. On one hand, SUEZ evaluates the most significant sustainability issues based on their potential impact on the environment and society. On the other hand, the Group carefully examines the effects of sustainability matters on its financial performance, accounting for the associated risks and opportunities that could affect its operations and overall business model.

In alignment with the CSRD's requirements, SUEZ has undertaken an extensive and rigorous double materiality analysis (DMA) throughout 2023 and 2024, to systematically identify its most material Environmental, Social, and Governance (ESG) issues, as well as the corresponding impacts, risks, and opportunities (IROs). A key objective of this comprehensive analysis is to ensure that SUEZ can report on sustainability matters in a structured, transparent, and responsible manner that reflects the full scope of its environmental, social, and governance impacts – including those arising from actions plans – while also addressing the financial implications of those factors.

To guarantee the relevance, accuracy, and robustness of the analysis, SUEZ has leveraged the expertise and knowledge of a diverse range of operational directions spanning multiple geographies, along with insights from subject matter experts and key stakeholders. The scope of the DMA considers a wide array of operational, geographical, stakeholder, and temporal factors, ensuring that the analysis comprehensively covers all relevant areas of the business. This approach reflects the complexity of SUEZ business model and reinforces the Company's commitment to sustainability and long-term value creation.

The DMA was carried out in accordance with the European Sustainability Reporting Standards (ESRS 1) and the process for conducting this exercise is detailed hereafter.



IRO parameters and assumptions

Geographical scope: SUEZ operates in over 40 countries worldwide, including both developed and emerging markets. The geographical scope of the DMA reflects this global footprint and recognizes the varying regulatory, environmental, and social contexts in different regions.

For example:

- in developed markets like Europe, North America, and Australia, the DMA considers stricter environmental regulations, circular economy initiatives, and climate-related risks;
- in emerging markets (e.g., parts of Asia, Africa, and Latin America), the focus is on infrastructure development, access to clean water, waste management, climate-related physical risks, and socio-economic impacts.

The assessment also acknowledges the different sustainability risks, impacts, and opportunities that arise from the varying legal, social, and environmental conditions in these different geographies.

Operational scope: SUEZ is involved in a broad range of environmental services, each with its own set of sustainability challenges and material issues. The operational scope of the DMA includes all relevant business units and activities, as well as the upstream and downstream value chain, ensuring that the materiality analysis reflects the diverse environmental, social, and governance impacts across SUEZ services. Specifically, the scope covers:

- **Water and Wastewater Services:** including the provision of clean water, wastewater treatment, water reuse, and infrastructure development in urban and industrial settings;
- **Waste Management:** including waste collection, treatment, recycling, landfill management, and the development of circular economy solutions;
- **Resource Recovery:** focusing on how waste can be converted into valuable resources, such as energy from waste, biogas production, and the recovery of critical materials from waste streams;
- **Downstream value chain:** clients, consumers and end-users, local communities, external stakeholders, service providers, etc.;
- **Upstream value chain:** suppliers and their workforce, procurement partners, business partners, etc.

Given SUEZ involvement in complex supply chains for water treatment chemicals, waste processing technologies, and recycling infrastructure, the scope covers material issues within the supply chain. This includes looking at upstream and downstream impacts, such as supplier sustainability, labour conditions in supply chains, and the environmental footprint of product life cycles.

Sources & Consultations

To ensure that the materiality assessment was comprehensive and considered all relevant sustainability issues, SUEZ drew from a variety of internal and external sources. These include:

- existing research, internal documentation, and operational data;
- regulatory and legal frameworks (EU Green Deal, Paris Agreement, Circular Economy Action Plan, and local water and waste laws);
- internal and external stakeholder engagement findings;
- industry and peer benchmarking (engagement with trade associations such as the EUREAU, FEAD, FNADE, AquaFed, etc.);
- global reports and frameworks (IPCC, UN SDGs, World Economic Forum Global Risks Report);
- environmental impact assessments.

IRO identification

The DMA process began with IRO identification workshops aimed at comprehensively identifying the impacts, risks, and opportunities for each sustainability matter. Facilitated by a dedicated ESRS pilot and relevant working groups, these workshops focused on identifying IROs at the sub-topic level to ensure thorough exploration of all relevant matters. Given the extensive scope of the topics and their direct connection to SUEZ core activities, multiple working sessions were conducted with subject matter experts, the CSRD project team, Internal Control, and the Enterprise Risk Management Direction. Initially, existing research and documentation on SUEZ actual and potential impacts on people and the environment provided a foundational basis for identifying the Group's broader impacts – an essential aspect given the Company's core business activities, which are inherently linked to environmental and social services. Similarly, the Group's Enterprise Risk Management framework served as a basis for identifying risks and opportunities with potential financial implications for SUEZ. Additional databases, sources, and other ESRS-relevant data used in the identification process of impacts, risks, and opportunities are outlined in their respective ESRS sections.

Development of a SUEZ CSRD-compliant scoring matrix

In a second instance, using part of the Group's existing ERM scoring matrix, a revised CSRD-compliant IRO scoring matrix was created to facilitate the prioritisation and scoring of impacts, risks, and opportunities across the different ESRS. Relying on both qualitative and quantitative thresholds, the scoring table consists of three sections:

- **risk and opportunity scoring:** this section assesses the financial (EBITDA), reputational, business continuity, and strategic effects of the risks and opportunities for the Group;
- **impact scoring:** this section assesses the scale, scope, and irremediability of the Group's wider environmental and social impacts;
- **likelihood scoring:** this section assesses the likelihood of occurrence of a risk, opportunity, or potential impact.

IRO scoring & outcome

To determine the material sustainability matters for the Group, society, and the environment, IROs were individually scored with a large panel of stakeholders. Scoring was guided by the ESRS principle of double materiality, evaluating impact materiality and financial materiality. Impact materiality and financial materiality have been assessed according to thresholds (from 1 – low materiality, to 4 – critical materiality) as defined by the SUEZ CSRD matrix. The materiality threshold for both impact materiality and financial materiality was made in coherence with other major Group-level scoring matrices, retaining IROs that strictly exceeded a score of two across either materiality axes. Risk scenarios were strictly scored on an inherent basis, while any negative impact on human rights prioritised the severity of the impact over its likelihood. SUEZ ensured that negative impacts were prioritised on their relative likelihood and severity, whilst positive impacts were prioritised based on their scale, scope, and likelihood. Sustainability-related risks are integrated into SUEZ Enterprise Risk Management (ERM) framework and are assessed using the same rigorous methodology as financial, operational, and strategic risks. Their prioritisation depends on their relative score, which is determined through a structured risk assessment process that considers factors such as financial impact, regulatory exposure, operational disruption, and reputational consequences. Sustainability-related risks that meet the Group's materiality and severity thresholds are retained at the Group level ERM, ensuring they are treated as strategic priorities.

SUEZ employs a combination of qualitative and quantitative risk-assessment tools, including scenario analysis, climate stress testing, and likelihood matrices, to evaluate sustainability-related risks. The Group also aligns its assessment methodology with external sustainability reporting frameworks, such as the TCFD (Task Force on Climate Related Financial Disclosures), and integrates sustainability risk considerations into its business continuity planning. This ensures that sustainability risks are not only identified and monitored but are also actively managed alongside other enterprise risks to support long-term resilience and value creation.

The outcome of the double materiality analysis resulted in 50 material impacts, risks, and opportunities across all ESRS. SUEZ guarantees all its stakeholders and its value chain that it carefully considers a very broad spectrum of ESG topics. More information on how SUEZ addresses and responds to the effects of its impacts can be found in the relevant "Environment", "Social", and "Governance" sections. Additionally, SUEZ most significant ESG risks and opportunities and how these are mitigated and capitalised on, are detailed in the relevant ESRS throughout the report.

The final list of 50 material IROs was submitted for validation to the Executive Committee, the CSR Committee, and the Audit and Risk Committee as part of the Group's governance process.

1.3.2. Double materiality assessment results (SBM-3)

Based on the results of the double materiality analysis, 50 material IROs have been identified, as outlined below. The Group believes that the current and anticipated effects of its significant impacts, risks, and opportunities on its strategy, business model, and value chain are clearly represented in its *Sustainable Development Roadmap 2023-2027* and are integrated into its decision-making process. As detailed in the previous section on strategy and business model, the Group has opted to present its IROs along two key axes.

The first, "SUEZ, an essential solutions provider" highlights the Group's pivotal role in delivering sustainable and innovative solutions that address critical environmental and societal challenges. Through its core services in water management and waste treatment, SUEZ is dedicated to improving the quality of life for people and communities while actively contributing to environmental preservation. This commitment includes ensuring access to clean water, efficient waste management, and supporting the circular economy through the reuse and recycling of resources.

The second, "SUEZ, an operator of industrial excellence" underscores SUEZ position as a responsible industrial actor, focusing on operational safety, environmental care, and corporate responsibility. SUEZ recognizes its obligations not only to its employees, stakeholders, and clients but also to the planet, ensuring that all activities adhere to the highest standards of safety, ethical business practices, and environmental stewardship. The Company's dedication to industrial excellence is reflected in its continuous efforts to improve safety protocols, reduce environmental impacts, and advance sustainable technologies.

Together, these two axes demonstrate SUEZ holistic approach, reinforcing its commitment to both delivering essential services and maintaining responsible and sustainable industrial operations. The DMA will be reviewed every three years or following any major modifications to the Group's perimeter.

Subtopic	Code	IRO	Upstream	Own Operations	Down-stream	Time Horizon
SUEZ, AN ESSENTIAL SOLUTIONS PROVIDER						
ENVIRONMENT						
Climate change mitigation	IRO-E1-4	Development of new business models aimed at reducing the carbon tax for potential customers who may be affected.		O	O	▶▶▷
Energy	IRO-E1-6	Opportunity to increase SUEZ energy production to meet the demand from customers in the context of transition to a 1,5°C world.			O	▶▶▷
Pollution of air	IRO-E2-1	Despite strict monitoring and the use of best available techniques to manage atmospheric discharges from Energy from Waste (EFW) facilities, occasional exceedances of thresholds can occur. Public perception of incinerators emissions remains predominantly negative, presenting reputational challenges.		R		▶▶▷
Pollution of water	IRO-E2-3	By providing wastewater and waste treatment services, SUEZ actively mitigates pollution of natural, aquatic, and marine environments.	I+		I+	▶▷▷
Pollution of soil	IRO-E2-4	The conversion of landfills into "green landfills" (with biogas recovery, leachate treatment and possibly solar panels) has positive effects on the environment and on public health at local level.		I+		▶▷▷
Substances of concern and very high concern	IRO-E2-6	The introduction of new regulations targeting the reduction of micropollutants, including PFAS and microplastics, presents a growth opportunity. By aligning with these standards, SUEZ can update its contracts and expand its market presence.			O	▶▶▷
Water & Marine resources	IRO-E3-2	SUEZ contributes to reducing the pressure on water resources, through its solutions for reducing losses, recharging groundwater, reusing water, and desalinating seawater.	I+		I+	▶▷▷
	IRO-E3-3	Deployment of SUEZ solutions in areas where there is no or insufficient supply/coverage (drinking water production, wastewater treatment, reuse, recharge, desalination).		O		▶▶▷
Direct impact drivers of biodiversity loss & impacts on the extent and condition of ecosystems	IRO-E4-2	Through its key activities in waste management and wastewater treatment, SUEZ contributes to the protection of the environment and ecosystems (reduction in the extraction of raw materials / protection of biodiversity).		I+		▶▷▷
Impact and dependencies on ecosystem services	IRO-E4-3	SUEZ is dependent on ecosystem services to help minimise residual pollution from its discharges. In addition, the key businesses of SUEZ (water and waste) reduce the pressure on ecosystem services caused by pollution.		I+		▶▷▷

I+ Positive Impact I- Negative Impact R Risk O Opportunity

Subtopic	Code	IRO	Upstream	Own Operations	Down-stream	Time Horizon
Resources inflows, including resource use	IRO-E5-3	Regulations promoting a circular economy and reducing raw material usage present a significant opportunity to leverage our expertise in waste and resource management.	O	O		▶▶▷
Resources outflows related to products and services	IRO-E5-4	The possible inclusion of incineration in the EU European Trading Scheme (ETS) regulation by 2028, which sets a cap on GHG emissions, presents a dual opportunity: 1/ development of upstream recycling to limit and reduce the fossil content of incoming waste and related emissions. 2/ development of future projects to turn residual waste into new resources (waste-to-X facilities, carbon capture use and storage).		O	O	▶▶▷
	IRO-E5-5	Preservation of natural resources on the upstream and downstream value chain through activities of prevention, reuse selective collection, sorting and recycling.		I+	I+	▶▷▷
Waste	IRO-E5-6	Value creation around alternative treatment for residual waste through energy recovery and conversion of CO_2 into Sustainable Aviation Fuel (SAF) for maritime and aviation sectors or other molecules.			O	▶▶▷
	IRO-E5-7	Reducing of customers' waste at source (industrial and local authorities) through performance contracts.	I+	I+		▶▶▷
SOCIAL						
Communities' economic, social and cultural rights	IRO-S3-2	SUEZ provides access to drinking water, water sanitation and waste management services to offer a better quality of life of local populations.		O		▶▷▷
Personal safety of consumers and/or end-users	IRO-S4-1	SUEZ ensures the health & safety of its consumers & end-users by implementing very strict water quality management standards across each Business Unit. SUEZ monitors it centrally to ensure the uniformity in quality standards.		O	O	▶▶▶
Social inclusion of consumers and/or end-users	IRO-S4-3	SUEZ is improving access to water services for all its consumers and end users with various initiatives which are not limited to specific technologies or social and tariff engineering.		O	O	▶▶▶
GOVERNANCE						
Political engagement	IRO-G1-5	SUEZ is politically committed to the resilience and quality of water, the promotion of the circular economy and the energy recovery from waste, which contribute directly to the ecological transition to promote a sustainable future for its consumers.		I+		▶▷▷

I+ Positive Impact I- Negative Impact R Risk O Opportunity

Subtopic	Code	IRO	Upstream	Own Operations	Down-stream	Time Horizon
SUEZ, AN OPERATOR OF INDUSTRIAL EXCELLENCE						
ENVIRONMENT						
Climate change adaptation	IRO-E1-1	Inability to deliver SUEZ services in the event of flooded drinking water assets, resulting in an average business interruption of 2 days.			I-	▶▶▷
	IRO-E1-2	Flooding and storms resulting in the destruction of assets, damage to goods, business interruption, replacement, and repair costs, etc.		R		▶▶▷
Climate change mitigation	IRO-E1-3	SUEZ activities emit GHG (direct and indirect within its value chain) such as CO_2, CH_4, and N_2O which are emitted into the atmosphere, thereby exacerbating climate change.		I-		▶▶▷
Energy	IRO-E1-5	Volatility of energy prices is a risk in the management of SUEZ financial results.		R	R	▶▷▷
Pollution of water	IRO-E2-2	In the event of heavy rainfall, or where water infrastructures are missing or undersized, wastewater networks can overflow, and this untreated water can be discharged into the environment, with a potential negative impact on nature and local communities.			I-	▶▷▷
Pollution of soil	IRO-E2-5	The potential for liability from ancient soil pollution on old landfills could harm the Group's reputation.		R		▶▶▷
Water & Marine resources	IRO-E3-1	Water stress leads to changes in water consumption behaviours, generating conflicts of uses and a potential loss of revenue for the Group.		R	R	▶▷▷
Direct impact drivers of biodiversity loss & impacts on the extent and condition of ecosystems	IRO-E4-1	Climate change is one of the 5 pressures identified by the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) as a contributor to the loss of biodiversity. SUEZ GHG emissions (ESRS E1) contribute to climate change.		I-		▶▶▷
Resources inflows, including resource use	IRO-E5-1	Increased costs due to the difficulty in sourcing business-critical raw materials (chemicals, water, building materials, metals, etc.).	R			▶▷▷
	IRO-E5-2	Changes in regulations that reduce the amount of waste eligible for incineration or landfill disposal necessitate significant adjustments to the company's strategy and business model.			R	▶▷▷

I+ Positive Impact I- Negative Impact R Risk O Opportunity

Subtopic	Code	IRO	Upstream	Own Operations	Down-stream	Time Horizon
SOCIAL						
Working conditions	IRO-S1-1	An open and transparent social dialogue improves the relationship / trust between management and employees leading to better understanding & collaboration, thus promoting a positive and productive working environment.		I+		▶▷▷
	IRO-S1-2	Major loss event on a site (fire, explosion, extreme climatic event...).		R		▶▷▷
	IRO-S1-3	A work accident linked to SUEZ activity may occur, with serious or fatal consequences for one or more employees (such as the presence of toxic gas or lack of oxygen in water networks, collision of machinery or vehicles with a pedestrian, fall of a load, fall from a height, risk of collapse of a trench, risk of fire or explosion, electrical risk, crushing of limbs in a dangerous machine that is not consigned).	I-	I-		▶▷▷
	IRO-S1-4	SUEZ prioritises the health and safety of its employees by applying Group H&S standards in countries where regulations may be weak.		I+	I+	▶▷▷
	IRO-S1-5	The risk of increased costs due to changes in regulations requiring industrial sites to comply with Health & Safety measures (e.g. increasing the height of site security barriers).		R		▶▶▷
	IRO-S1-6	SUEZ implements a strong HSE and Human Rights policy for its employees (e.g., such as 'Life Saving Rules', mandatory trainings, Speak Up & Stop, visual campaigns, Ethics Charter, etc.) leading to better protection of employees & subcontractors across its value chain than that of the sector average.		I+		▶▷▷
	IRO-S2-1	SUEZ engages with suppliers to support the implementation of expected standards for health and safety and working conditions.	I+		I+	▶▶▷
Equal treatment and opportunities for all	IRO-S1-7	SUEZ provides training budgets, tools, and monitors the training and career management process, allowing employees to develop new skills in order to better meet the Group's strategic orientations and increase competitiveness.		I+		▶▶▷
	IRO-S2-2	The large number of suppliers makes it difficult to gather information on human rights, gender equality, diversity, training and skills for workers in the value chain, and to exercise any leverage on potentially bettering practices.	I-			▶▶▷
Other work-related rights	IRO-S2-3	Reputational risk linked to the engagement of temporary agency suppliers for temporary workers on SUEZ sites with less control on their work-related rights.	R		R	▶▶▷
	IRO-S2-4	SUEZ requires its suppliers to share SUEZ values in relation to human rights, health and safety and inclusion and will terminate any contracts that have a breach of ethical principles, especially with regards to child & forced labour.	I+			▶▷▷

I+ Positive Impact I- Negative Impact R Risk O Opportunity

Subtopic	Code	IRO	Upstream	Own Operations	Down-stream	Time Horizon
Communities' economic, social and cultural rights	IRO-S3-1	SUEZ facilities can generate some nuisances for neighbouring inhabitants (odour, noise, traffic).		I-	I-	▶▷▷
	IRO-S3-3	SUEZ activities are non-delocalisable and contribute to local economic development through job creation.		I+		▶▷▷
Personal safety of consumers and/or end-users	IRO-S4-2	The tightening of regulatory requirements, combined with a shortage of water and a deterioration in its quality, means that treatment costs are rising, with a long-term impact on water prices.			I-	▶▶▶
GOVERNANCE						
Corporate culture	IRO-G1-1	The absence or inadequacy of a corporate culture of ethics and compliance would have serious consequences for the Group's reputation.		R		▶▶▷
	IRO-G1-2	A strong corporate culture of ethics and compliance reinforces the sustainability of the Group's financial results.		O		▶▶▷
Protection of whistleblowers	IRO-G1-3	Non-treatment or poor treatment of potential cases of non-compliance reported via the hotline would call into question the credibility of SUEZ system.		R		▶▶▷
	IRO-G1-4	The effective, high-quality handling of potential cases of non-compliance reported via the alert line reinforces a 'speak up' culture, and in particular employee confidence in the system.		O		▶▶▷
Corruption and bribery	IRO-G1-6	SUEZ uses a number of means (e-learning tools, presentations, webinars, etc.) to increase its employees' awareness of corruption issues.		I+		▶▷▷
	IRO-G1-7	SUEZ regularly interacts with public sector stakeholders in the course of its activities. In the case of proven acts of active corruption of foreign public official(s), this would correspond to a failure by SUEZ to respect its commitments as well as the international and local laws and regulations applicable to the Group		I-		▶▷▷
	IRO-G1-8	SUEZ being implicated following a scenario of corruption/ conflict s of interest with public officials is a financial, reputational, and business risk		R	R	▶▶▷

I+ Positive Impact I- Negative Impact R Risk O Opportunity

The actions, in response to these IROs, outlined throughout this statement are embedded within SUEZ core operations in waste management and water services, forming an integral part of its ongoing business activities. These initiatives are not isolated measures introduced solely to address specific impacts, risks, or opportunities but rather fundamental components of the Group's operational model. As a result, there are no distinct operational or capital expenditures attributable exclusively to these actions that warrant separate disclosure under the CSRD. The financial resources allocated to these activities are incorporated within the Group's overall operational and capital expenditure frameworks, as reflected in the consolidated financial statements.

1.3.3. Cross-cutting material Group policies

Policy name	Key contents	Policy owner	Scope of application	ESRS concerned	Third-party standards or initiatives	Policy availability
Sustainable Development Roadmap 2023-2027	**24 operational commitments** with the aim of stepping up SUEZ efforts regarding the climate, the preservation of nature and social responsibility in the coming years.	Sustainable Development Executive Director	All SUEZ entities	E1, E2, E3, E4, E5, S2, S3, S4	• United Nations SDGs Climate:  Nature:  Social : 	SUEZ website
Health, Safety, & Environment Risks Policy	SUEZ strives to eliminate all industrial accident that could have an impact on people, environment and assets. **ZERO severe and fatal accident** is the Group's fundamental goal on Health, Safety and Environment.	Chief Executive Officer	SUEZ employees, temporary workers, contractors, third parties and all those affected by SUEZ activities	E2, E3, S1, S2, S3, S4	• Conventions of the International Labour Organization (ILO), • The Charter of Fundamental Rights of the European Union, The Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises, • The European Directive on corporate sustainability due diligence (CS3D), • The International Finance Corporation's sustainability standards	SUEZ website
Resource Use and Circular Economy Policy	SUEZ considers the **waste hierarchy** as a guiding principle and contributes to ecological transition through **resources preservation** and the adoption of more sufficient resource use.	Sustainable Development Executive Director	Upstream and downstream waste and water value chains	E3, E5	• United Nations SDGs • United Nations Global Compact • OECD principles on water governance • Water Framework Directive • The International Finance Corporation's sustainability standards • ISO norms on circular economy (59004, 59010, 59020)	Upcoming validation on SUEZ website

Policy name	Key contents	Policy owner	Scope of application	ESRS concerned	Third-party standards or initiatives	Policy availability
Human Rights Policy	SUEZ ensures compliance and aims to **mitigate human rights impacts** by fostering a culture of inclusion and equality while addressing labour and human rights risks, such as forced and child labour, and workplace safety.	Sustainable Development and Legal Directions	All SUEZ activities and its subsidiaries included in its scope of consolidation	E3, S1, S2, S3, S4	• Universal Declaration of Human Rights • Conventions of the International Labour Organisation • Charter of Fundamental Rights of the European Union • OECD Guidelines for Multinational Enterprises • United Nations Guiding Principles on Business and Human Rights • United Nations Convention against Corruption	SUEZ website Supplier contracts
Ethics Charter	SUEZ establishes **core ethical principles,** providing a shared foundation for daily collective and individual actions and behaviours.	Group General Counsel	All SUEZ employees and entities	S2, S3, G1	• The 10 principles of the UN Global Compact	SUEZ website Supplier contracts
Sustainable Purchasing Charter	SUEZ strives to **choose responsible suppliers** to preserve resources, reduce GHG emissions, preserve biodiversity, and the development of local communities.	Executive Vice-President, Performance & Procurement	All SUEZ activities and its supply chain	E3, E4, E5, S2	• International Labour Organisation (ILO) • Fundamental Conventions • The 10 principles of the UN Global Compact • Applicable environmental and social laws and regulations in the countries where suppliers operate.	SUEZ website Supplier contracts

1.3.4. Sustainable Development Roadmap 2023-2027

In line with the Group's strategy, the Sustainable Development Ambitions and Commitments, id targets from *Sustainable Development Roadmap* were defined through a review of stakeholder expectations, outlining the most important issues, and close dialogue with subsidiaries as part of the development of their medium-term plans. The targets were revised by the Executive Committee and CSR Committee prior to final approval by the Board. They were then presented before the European Works Council.

These above commitments are reviewed on an annual basis by the CSR Committee. The latter also sets targets for the next year, overseeing alignment between the resources allocated and their deployment.

In addition, 20% of SUEZ executives' long-term compensation is indexed on the attainment of these targets, with a focus on health and safety, reductions in greenhouse gas emissions, and equal opportunities.

The progress of these commitments is reported annually in a dedicated publication, available online. The first Progress Report was published in April 2024. Most of the targets of the targets are due to 2027 except for some climate related commitments which are due to 2030.

CLIMATE

Commitment	Indicator	2021 pro forma 2024	Objective
CONTRIBUTING TO ENERGY DECARBONISATION			
Make our own electricity consumption more sustainable	Share of sustainable electricity (renewable and recycled) consumption over total Group electricity consumption (%)	Group: 29% Europe: 24%	By 2030 Group: 70% Europe: 100%
Reach European electricity self sufficiency	Share of electricity production (renewable and recycled) over electricity consumption in Europe	1.04	By 2027 > 1
Contribute to the low-carbon energy transition of territories: more emissions avoided (thanks to energy production) than emitted (from consumption	Share of GHG avoided from energy production over GHG emitted by energy consumption	1.00	By 2027 >1
DECARBONISING OUR VALUE CHAIN			
Reduce Scope 1 and Scope 2 (market-based) emissions	GHG from Water activities: Scope 1 + Scope 2 (kilotons of CO_2 eq.)	746	By 2030 - 39%
	GHG from Waste activities excluding waste to energy: Scope 1 + Scope 2 (kilotons of CO_2 eq.)	2,145	By 2030 - 26%
	GHG from energy from waste activities: Scope 1 + Scope 2 (kilotons of CO_2 eq.)	1,728	By 2030 - 2%[2]
	Energy from Waste activities[1]: cumulated investment in carbon capture	First publication in 2024	By 2030, investment of tens of millions € for carbon capture
Reduce Scope 3 emissions	Share of Scope 3 covered by GHG mitigation action plans (%)	2%	By 2030, 50% of Scope 3 covered by an action plan
ADAPTATION			
Adapt our priority and vulnerable sites to climate change	Share of priority and vulnerable sites with a defined action plan	5%	By 2027 100%

(1) Energy recovery from non-hazardous waste, hazardous waste and RDF/SRF.
(2) This target will be revised upwards depending on the inclusion of energy recovery in the EU ETS and the definition of a sectoral trajectory.

NATURE

Commitment	Indicator	2021 pro forma 2024	Objective
PRESERVING RESOURCES			
Limit our impact on fresh water	% of commercial proposals concerning water production and distribution with a commitment to preserving water resources	First publication in 2023	By 2027 100%
	% of distribution contracts in water-stressed areas with a commitment to preserving	First publication in 2023	By 2027 100%
Support recycling and reuse	Waste recovery rate[1] Tons recovered	First publication in 2023	By 2027 ↗
GROWING OUR NATURE REGENERATION CAPACITIES			
Grow natural environments regeneration capacities of SUEZ	Cumulated Turnover generated by solutions identified as regenerating[2]	1 246 K€	By 2027, create and develop existing and new SUEZ business models and solutions to accelerate natural environment regeneration and preservation
ADDRESSING PRESSURE ON BIODIVERSITY			
Roll out biodiversity action plans at all biodiversity priority sites[3] managed by SUEZ	% of biodiversity priority sites[3] where biodiversityaction plans[4] are deployed and implemented	KPI revised in 2024 following new CSRD criterias	By 2027 100%
	% of commercial proposals in biodiversity priority zones that include an offer towardsbiodiversity preservation[5] [6]	< 5%	By 2027 100%
Prevent the spillage of micropollutants in natural environments	% of commercial proposals for sanitation infrastructure[7] construction in areas at stake[8] with micropollutants removing solutions (prevention, advanced treatments etc.)[9]	-	By 2027 100%
Reach zero phytosanitary products used green spaces on sites managed by SUEZ	% of sites not using phytosanitary products	73%	By 2027 100%
Contribute to reduce the land artificialization pace	Total Cumulative Renatured Area	First publication in 2024	By 2027 Double
Contain invasive non-native species	% of renaturation and landscaping operations using only local species	First publication in 2023	From 2025 100%
Drastically reduce light pollution of sites managed by SUEZ	% of biodiversity priority sites regarding biodiversity where a light reduction policy is deployed[10]	< 5%	By 2027 100%

(1) Including energetical recovery.

(2) We consider at SUEZ that, this KPI concerns only innovative and new solutions developed by SUEZ to regenerate nature that are additional to typical SUEZ sector of activity's solutions that protect, preserve, or develop biodiversity.

(3) SUEZ definition of a priority site regarding biodiversity:

- *that is in or crosses or is situated along 1) In Europe Natura 2000 areas (birds or habitats) and 2) in the rest of the world IUCN protected areas 4, 5 or 6;*
- *or has a surface that is superior to 10 ha;*
- *or is an open landfill site.*

(4) A biodiversity action plan is specific to each priority site addressing its specific challenges to effectively preserve biodiversity locally. It is generally designed by experts (environmental engineer or specialist, ecologist).

(5) SUEZ considers that an offer regarding biodiversity preservation is composed of a biodiversity diagnosis of a site and a biodiversity action plan.

(6) If and when authorized by call for tenders.

(7) For WWTP whose capacity exceeds 200,000 inhabitants eq.

(8) Some areas contain more micropollutants in wastewater than others. Areas at stake will be defined through the coming legislation (e.g.DERU).

(9) If and when authorized by call for tenders.

(10) Unless prohibited by prefectural decree.

SOCIAL

Commitment	Indicator	2021 pro forma 2024	Objective
ENSURING RESPECT FOR UNIVERSAL RIGHTS			
Respect basic rights throughout our value chain	Number of basic rights infringement	0	From 2023 0
	Number of corruption cases	0	From 2023 0
	% of FTEs[1] covered by a social dialogue mechanism	93.5%	From 2023 > 92%
	% of at-risk suppliers monitored	Available in 2024	By 2027 100%
Make health and safety our top daily priority	Frequency rate	6.73	By 2027 < 5.30
	Severity rate	0.51	By 2027 < 0.39
CONTRIBUTING TO THE SUSTAINABLE DEVELOPMENT OF COMMUNITIES WHEREVER WE OPERATE			
Contribute to local prosperity and inclusion for all	% of FTEs[1] paid at a decent wage (after 2 years of operation, in countries where legal minimum is either too low or non-existant)	First publication in 2023	By 2027 100%
	% of spent with local SMEs [3]	First publication in 2023	By 2027 20%
	Number of beneficiaries of SUEZ inclusive structures & job inclusion programs	2,308	By 2027 5 000 per year
	Spent in inclusive structures (i.e., employing vulnerable people; work reintegration facilities, ESATs in France)	29 M€	From 2023 45 millions of euros
Promote access to basic services in most critical situations	% of water distribution contracts covered by a solidarity mechanism	First publication in 2023	From 100% [2]
	% of water distribution contracts "profiled" towards water poverty	First publication in 2023	By 2027 100%
GROWING SKILLS AND FOSTERING EMPLOYEE ENGAGEMENT			
Develop our skills	% of people trained in the workforce per year)	72.2%	From 2023 80%
Promote equal opportunities	% of FTEs in the workforce with disabilities	2.8%	By 2027 > 4%
Eliminate gender disparities	% of women in management positions	34.3%	By 2027 > 40%
	Global gender gap	88.9 France	By 2027 > 85
Encourage collective commitment	Employees shareholding (%)	First publication in 2023	By 2029 10%
	Number of hours of voluntary work from SUEZ employees with local associations/causes	414	By 2027 5 000 hours
	Employee Engagement rate (Pulse)	+9 vs. Benchmark	From 2023 +10 vs. Benchmark

(1) Full time employee.
(2) When the specifications of the contract allow it.
(3) Small and Medium Entreprises.

1.4. Basis for preparation

1.4.1. General basis for sustainability statement (BP-1)

SUEZ Sustainability Statement is an integral part of the Group management report, as required by Article L. 233-28-4 of the French Commercial Code and is drafted in accordance with the requirements set out in the ESRS and Article 8 of Regulation (EU) 2020/852 for taxonomy information, applicable at the date of preparation of the first sustainable statement.

2024 SUEZ Sustainability Statement has been prepared in the context of first year application of CSRD, characterized by numerous limitations and challenges. Among these, several interpretations of the texts remain, a lack of comparative data and benchmarks and the absence of established guidance, practices and frameworks.

Accordingly, SUEZ endeavored to deploy all reasonable efforts to transparently implement the requirements set by ESRS and the European Taxonomy, based on the information and knowledge available at the time it was drawn up.

In this context of first year of CSRD requirements application, certain information required by the ESRS standards will be phased and is not available at year-end 2024 due to regulatory constraints, difficulties due to absence of data or data estimation, or time constraints for implementing a global reporting tool to collect, isolate and process information. These omissions concern in particular data point 16.a relating to ESRS E4 – Biodiversity and Ecosystems (see ⩥ section *5.3.2 Material sites with negative impact on biodiversity* (E4-4)).Therefore, the Group may be required to review and modify certain reporting and communication practices of Suez Sustainability Statement in the following years.

The Group is committed to continuously improve its understanding of the ESRS requirements, considering additional recommendations, positions or market interpretations, publication of new guide by EFRAG or European Commission, or implementation of additional standards (particularly sector-specific standards).

Indeed, the Group's internal control procedures relating to the preparation of sustainability information will be progressively strengthened with the experience acquired in the first reporting period. The Group also plans to periodically review its process to identify the impacts, risks and opportunities associated with its activities, through its double materiality assessment.

SUEZ Sustainability Statement is prepared on a consolidated basis, following the same scope as the Group's consolidated Financial Statements, as outlined in notes 3.1 and 18 of the Group's Consolidated Financial Statements. This scope is referred to as the "own operations" perimeter.

For the sake of clarity:

- this includes joint operations and entities over which SUEZ has control but assessed to be not material from a financial perspective;
- as part of the "operational control" analysis required by the European Sustainability Reporting Standards (ESRS) E1, E2, and E4, that applies to specific data points such as GHG emissions, pollutants, and the number of biodiversity-sensitive sites, an entity is considered under SUEZ operational control if "the undertaking has the ability to direct the operational activities and relationships of the entity, site, operation, or asset," regardless of ownership. In line with the guidance provided by EFRAG, SUEZ considers that its operational control perimeter is aligned with its financial control one.

Based on its understanding of the available guidance on operational control, SUEZ concluded that the Group has operational control over (i) some third party assets associated with contracts or (ii) sites that the group does not legally own. This includes assets under:

- Operation and Maintenance (O&M) contracts;
- concession contracts, where SUEZ operates the asset but does not own it.

The Group has conducted a materiality analysis covering both its own operations and the Group's upstream and downstream value chain. The identification of impacts, risks, and opportunities (IRO) may include both potential and existing elements. The double materiality analysis (DMA) enabled the identification of IROs that can consider actions already carried out Through this exercise, SUEZ has identified 50 impacts, risks and opportunities (IROs) that it considers material in view of its activity and the expectations of its stakeholders, detailed further in this Sustainability Statement, notably in ⩥ section *1.2.2 Interests and views of stakeholders*. To address these challenges, SUEZ develops and implements policies and action plans covering its own operations and value chain. To monitor their effectiveness, the Group has set a series of targets, some which relate to its value chain.

1.4.2. Disclosures in relation to specific circumstances (BP-2)

Time horizons

SUEZ adopts the same time horizons as those prescribed by the standards and as defined in chapter 6.4 of ESRS 1. As a reminder:

- **short-term:** the short-term horizon covers the reference period of this sustainability statement;
- **medium-term:** the medium-term horizon extends up to five years from the end of the reference period;
- **long-term:** the long-term time horizon goes beyond five years.

Value chain estimation, sources of estimation and outcome uncertainty

This Sustainability Statement contains information that cannot be directly measured and must therefore be estimated, resulting in a degree of uncertainty. This is particularly the case for data concerning the Group's value chain (both upstream and downstream), which is based on estimates where access to direct data is limited.

Wherever possible, these estimates are based on recognised databases. However, despite the Group's efforts to ensure data reliability, the underlying data is not always available with sufficient quality, which means that the Group's estimates may involve uncertainties. In such cases, the Group discloses the level of precision and margins of error relating to these data. The Group continues to work on improving the accuracy of its estimates and expects the quality of the underlying data to improve over the coming years.

This Sustainability Statement contains forward-looking information based on current opinions and assumptions about future events. This forward-looking information includes projections and estimates that are based on assumptions, project considerations, objectives and expectations relating to future events, operations, services, and on assumptions about future performance and synergies. No guarantee can be given that these projections and estimates will materialize, as they are subject to inherent risks, uncertainties and assumptions relating to SUEZ and its subsidiaries, to industry trends, to future investments and acquisitions, to changes in economic conditions, or to changes in the main markets, competition, and regulations. As the occurrence of such events is uncertain, their outcome could differ from that currently foreseen, which could have a material impact on expected results. Actual results could differ significantly from those projected or implied in forward-looking information.

Change in the preparation or presentation of sustainability information

The scope of this Sustainability Statement, and consequently the information published, differs from our previous Non-Financial Performance Statement (NFPS), particularly regarding the baseline of our Sustainable Development Ambitions and Commitments 2023-2027 (also referred to hereinafter as *Sustainable Development Roadmap 2023-2027* or "SD Roadmap 2023-2027"). Entities that were not financially consolidated were included in the scope of the NFPS and in the Sustainable Development Ambitions and Commitments 2023-2027 baseline. This different approach accounts for some discrepancies with the figures previously published by SUEZ. Explanations for these differences will be provided in the corresponding ESRS.

Reporting errors in prior periods

This section is not applicable to SUEZ.

Disclosures stemming from other legislation or generally accepted sustainability reporting pronouncements

This section is not applicable to SUEZ. The Sustainability Statement does not include additional information required by French legislation.

Incorporation of information by reference

This section is not applicable to SUEZ. The report does not use the mechanism of information incorporated by reference.

Use of phase-in provisions

The Group has decided to adopt certain transitional measures in preparing its sustainability statement. These transitional measures are summarised below:

- exemption for this 1st report on sustainability information from the information required concerning the breakdown of revenues by major sector in the absence of a sector-specific ESRS standard (ESRS 2 – SBM 1);
- exemption for this 1st report on sustainability information from the information required on the expected financial impact of significant impacts, risks and opportunities (ESRS 2 – SBM 3);
- exemption for this 1st report on sustainability information from the disclosure requirements relating to the expected financial impact of climate change, pollution, water and marine resources, biodiversity and ecosystem, and resource use and the circular economy, as defined in the thematic standards (E1-9/E2-6/E3-5/E4-6/E5-6);
- exemption for this 1st sustainability information report from the information required concerning the characteristics of external workers forming part of the Company's workforce (ESRS S1-7);
- exemption for this 1st sustainability information report from the required information on collective bargaining and social dialogue with regard to its employees in non-EEA countries (ESRS S1-8);
- exemption for this 1st sustainability information report from the required social protection information (ESRS S1-11);
- exemption for this 1st sustainability information report from the required information on the percentage of disabled employees (ESRS S1-12);
- exemption for this 1st sustainability information report from the required information on training and skills development (ESRS S1-13);
- exemption for this 1st sustainability information report from required health and safety information benefits (ESRS S1-14);
- exemption for this 1st sustainability information report from required work-life balance information benefits (ESRS S-15).

2

CLIMATE CHANGE (E1)

2.1. Governance

2.1.1. Sustainability-related incentive schemes (E1-GOV-3)

Please refer to ⩥ section 1.1.2. Sustainability-related incentive schemes in ESRS 2.

2.2. Strategy

2.2.1. Resilience of strategy and business model(s) (SBM-3)

Through the double materiality assessment, SUEZ conducted a comprehensive resilience analysis of its strategy and business model in relation to climate change. This assessment encompassed the entire organisation, including global operations and the value chain, both upstream and downstream. The analysis considered:

- SUEZ activities that may be vulnerable to physical risks, such as extreme weather events and water scarcity;
- transition risks linked to regulatory changes, market dynamics, and technological shifts.

The climate resilience analysis was conducted through a rigorous climate scenario assessment, incorporating both transition and physical risk scenarios. To ensure analytical robustness, regulatory compliance, and alignment with CSRD and taxonomy requirements, SUEZ engaged a specialised third party, Carbone 4 to assess vulnerabilities in its core activities, while internal expertise from SUEZ Consulting was leveraged to evaluate the exposure of its sites worldwide. This analysis encompassed all SUEZ activities and geographies, including its value chain, to comprehensively address both physical and transition risks. The assessment was conducted over the short, medium (aligned with financial planning), and long-term, ensuring a forward-looking and adaptive approach to climate resilience. As detailed below, SUEZ used public and recognised scenarios for this analysis, hence uncertainties of these scenarios are publicly available.

The analysis identified material impacts, risks, and opportunities, which are further detailed in ⩥ section *1.3.2. Double materiality assessment results*. Overall, the results demonstrate SUEZ ability to adapt its strategy across short-, medium-, and long-term horizons, ensuring continued business viability under both moderate and extreme climate conditions. Besides, policies and actions that are further developed in the report demonstrates the ability of SUEZ to adapt its business model to these IROs.

SUEZ integrated **two major scenario types** into its climate resilience analysis:

Transition risk scenarios

SUEZ used the International Energy Agency (IEA) Net Zero Emissions by 2050 (NZE 2050) scenario, which aligns with global climate goals to limit temperature rise to 1.5°C or lower, projecting impacts across 2030, 2040, and 2050. This analysis assessed key transition risks, including regulatory changes, evolving market demands, and technological advancements – particularly in renewable energy production and carbon capture, utilisation, and storage (CCUS).

To better reflect local market conditions, SUEZ also integrated country- and sector-specific scenarios, such as:

- **France:** *Stratégie Nationale Bas Carbone* (SNBC), the 2050 prospective analysis of FNADE (French waste federation), and the "Note Eau" study on future water business models;
- **United Kingdom:** The "Net-Zero Strategy: Build Back Greener" framework.

The resilience analysis incorporated key assumptions, including macroeconomic trends, energy consumption forecasts, and technological advancements such as renewable energy integration and CCUS deployment. SUEZ also accounted for population growth, GDP evolution, CO_2 pricing, and behavioral shifts expected to impact waste generation and water consumption. Financial implications of both physical and transition risks were assessed to guide strategic decision-making and mitigation efforts.

The IEA NZE 2050 scenario highlighted the importance of renewable energy expansion (biogas, biofuels, and solid bioenergy) and CCUS deployment in managing regulatory and market transition risks. SUEZ identified opportunities to support clients in reducing their environmental footprint through waste management innovations and water efficiency improvements. In line with evolving regulatory and consumer expectations, SUEZ has committed to increasing R&D investment by 50% between 2023 and 2027. Key R&D focus areas include:

- **water treatment:** membrane filtration and advanced treatment solutions;
- **waste management:** Ai-driven waste sorting, advanced anaerobic digestion, waste gasification, and plastic and tyre pyrolysis;
- **resource recovery:** recycling of wind turbine blades, Li-ion batteries, and photovoltaic panels;
- **carbon reduction:** CCUS technologies and CH_4 and N_2O mitigation to enhance sustainability across its operations.

The main conclusions of the resilience analysis on transition risks led to the following IROs:

- opportunity to develop new business models aimed at reducing the carbon tax for potential customers who may be affected (IRO-E1-4);
- opportunity to increase SUEZ energy production to meet the demand from customers in the context of transition to a 1,5°C world (IRO-E1-6);
- financial risk linked to the volatility of energy prices (IRO -E1-5).

Physical risk scenarios

To assess exposure to severe physical climate risks, SUEZ utilised Representative Concentration Pathway (RCP) 4.5 and 8.5 scenarios. These models provided insights into medium- and long-term risks across 2030, 2050, and 2070, particularly in geographies where extreme weather events are projected to intensify.

This assessment evaluated vulnerability to acute risks (e.g., floods, hurricanes) and chronic risks (e.g., rising temperatures, prolonged droughts). SUEZ infrastructure, especially in regions such as France, the Czech Republic, Asia, and South Africa, was identified as particularly vulnerable to flooding and water scarcity. The financial impact of these risks was quantified, including both the cost of climate-related damages and the cost of adaptation measures across short-, medium-, and long-term timeframes.

While uncertainty remains in data granularity for certain regions and long-term physical risk projections due to scientific limitations in climate models, SUEZ maintains a dynamic resilience approach, enabling continuous adjustments as new data emerges.

The main conclusions of the resilience analysis on physical risks led to the following IROs:

- operational risk with potential negative impact on our customers in case of inability to deliver SUEZ services in the event of flooded drinking water assets, resulting in a business interruption (IRO-E1-1);
- financial risk: flooding and storms resulting in the destruction of assets, damage to goods, business interruption, replacement, and repair costs, etc. (IRO-E1-2).

2.2.2. Transition plan for climate change mitigation (E1-1)

With the creation of the current SUEZ Group in 2022, the Group has developed a strategy and a *Sustainable Development Roadmap 2023-2027* that outline how SUEZ has anticipated climate change challenges and the measures it intends to implement for mitigation and adaptation. These documents, published on SUEZ website, have been formally approved by the Executive Committee and the Board of Directors.

The *Sustainable Development Roadmap 2023-2027* contains a decarbonisation plan for SUEZ scope 1 and scope 2 market based GHG emissions until 2030 that is further detailed below. On scope 3, SUEZ intends to develop a GHG mitigation action plan to cover at least 50% of its scope 3 emissions by 2030.

To complete this approach and be fully in line with CSRD expectations in terms of transition plan, SUEZ intends to set a reduction target on scope 3 and to work on a long-term target for its GHG mitigation plan.

Water Business: GHG emission reduction targets

SUEZ aims to reduce its scope 1 and 2 (market-based) greenhouse gas (GHG) emissions by 39% by 2030 compared to 2021 levels.

To achieve this target, SUEZ is implementing several key initiatives and adapting to external factors:

- **mitigation of nitrous oxide (N_2O) and methane (CH_4):** a dedicated research and development programme is in place to explore innovative emission reduction solutions;
- **support for client decarbonisation:** SUEZ is developing tailored mitigation solutions to assist its clients in reducing emissions;
- **decarbonisation of the electricity mix:** the Group is increasing its renewable energy consumption, both through on-site generation for self-consumption and through renewable electricity procurement from the market;
- **external factors:** climate scenario analyses suggest a gradual decarbonisation of the electricity mix in the countries where SUEZ operates, further supporting emission reduction efforts.

Waste Business: addressing decarbonisation challenges

SUEZ has set ambitious decarbonisation targets for its waste management activities, recognising the inherent challenges faced by this sector.

For waste incineration, the Group plays a critical role in treating non-recyclable waste that contains a high carbon content. Given current technological constraints, this process unavoidably releases CO_2 into the atmosphere. While SUEZ ensures full compliance with pollution control regulations, it is also investing in carbon capture, utilisation, and storage (CCUS) technologies to mitigate emissions. Specifically:

- SUEZ has committed to investing over €40 million by 2027 in CCUS innovations;
- pilot projects in the United Kingdom are already underway to capture and store CO_2, with significant emissions reduction potential.

The aim of CCUS technologies is to avoid the emission of CO_2 by capturing it before it is released and then storing it (CCS) or using it (CCU).

For waste activities excluding incineration, SUEZ aims to reduce scope 1 and 2 (market-based) GHG emissions by 26% by 2030 compared to 2021 levels, mainly by reducing methane emissions on its landfill activities and by helping new clients to switch to best-in-class landfill management which implies monitoring and mitigation of methane emissions to its lowest level.

For waste incineration activities, SUEZ aims to reduce scope 1 and 2 (market-based) GHG emissions by 2% by 2030 compared to 2021 levels, thanks to operational efficiency to minimize energy consumption. Part of these GHG emissions (around 1 million tons of CO_2eq) could be considered as locked-in until 2030, hence the definition of this target. Nevertheless, SUEZ has already identified solutions to mitigate these emissions thanks to CCUS projects and the first benefits could happen by 2032.

To sum-up, the *Sustainable Development Roadmap 2023-2027* includes a decarbonisation plan for SUEZ scope 1 and scope 2 market based GHG emissions covering 100% of its activities with no exclusions. The plan details quantitative targets to be achieved by 2030 compared to 2021 levels:

- water activities: -39%;
- waste (excluding incineration) activities: -26%;
- waste incineration activities: -2%.

Due to the lack of a reference trajectory by the Science Based Targets initiative (SBTi) for the waste management sector, SUEZ has opted not to submit its trajectory. However, SBTi provides the following objectives for mid-term targets for a baseline year in 2020 or later and a target year in 2030:

- -42% by 2030 to align with a 1.5°C scenario;
- -25% by 2030 to align with a well-below 2°C scenario[1].

To enhance this approach, SUEZ is also committing to work on its long-term net-zero commitment by developing and implementing a comprehensive transition plan that aligns with the goal of limiting global warming to 1.5°C, as outlined in the Paris Agreement. SUEZ anticipates that this transition plan will be fully integrated by the end of 2026. This plan will build upon the targets currently set in the *Sustainable Development Roadmap 2023-2027* and will be further refined and expanded to encompass the entire scope of the transition. Over a longer-term horizon – 20+ years – and in alignment with potentially evolving regulatory frameworks and guidelines, SUEZ is developing directional scenarios to align its operations with the 2050 EU Net Zero target.

Achieving these GHG reduction targets, which include decarbonising its own activities and facilitating the decarbonisation of its value chain – from suppliers to public and private customers – is integral to SUEZ strategy, operational activities, and business model.

Strategic pivoting and portfolio realignment

Water activities

- SUEZ is enhancing its water management operations by adopting advanced technologies to reduce GHG emissions in water and wastewater processes such as N_2O reduction in wastewater treatment and in sludge treatment (both composting and incineration).
- The deployment of digital tools aims to minimise energy and chemical consumption, while advanced technologies are being developed to achieve energy self-sufficiency in wastewater treatment facilities.
- Beyond municipal water services, SUEZ is re-entering the industrial water sector to support the transition plans and climate roadmaps of industrial clients.

(1) This comparison was available at the time SUEZ published its trajectory but is no longer maintained by SBTi except for scope 3 targets.

Waste activities

SUEZ is transitioning from traditional landfilling practices to sustainable waste management solutions, such as:

- recycling and plastic extraction from residual waste;
- anaerobic digestion of biowaste for energy recovery;
- refuse-derived fuel (RDF) to reduce emissions of SUEZ clients using coal or natural gas to produce thermal energy;
- production of renewable and low-carbon molecules to support the decarbonisation of the transport and petrochemical industries.

Investments in renewable energy – including biogas and bioenergy – along with improved energy efficiency measures, are pivotal to these efforts. This transition requires significant capital investment for the deployment of the necessary infrastructure.

Innovation and R&D investment

The Group's research and development initiatives are critical to driving innovation. With a doubling of investments in R&D, SUEZ is focused on developing and scaling new technologies and solutions that underpin its decarbonisation strategy.

Adaptation measures

Recognising the importance of resilience, SUEZ has implemented adaptation measures for climate-vulnerable sites to mitigate physical risks and minimise impacts on its operations caused by climate change.

By integrating these strategic shifts into its business model, SUEZ is well-positioned to meet its GHG reduction targets and contribute to the global effort to combat climate change, ensuring sustainable growth and operational resilience in the face of evolving environmental challenges.

As part of its overarching strategy and in full compliance with Commission Delegated Regulation (EU) 2021/2178, SUEZ ensures that its eligible activities make a substantial contribution to at least one environmental objective, such as climate change mitigation.

In 2024, under the two climate objectives, 56% of the Group's revenue was classified as taxonomy-eligible, with 29% fully aligned. Refer to the taxonomy chapter in ⩥ section 13.2.2.1.2. for more detailed information. This alignment is primarily driven by key activities, including:

- municipal water supply;
- wastewater treatment;
- selective waste collection;
- anaerobic digestion;
- composting;
- landfill biogas capture and utilisation.

These activities reinforce SUEZ commitment to sustainable resource management, GHG reduction, and circular economy principles, ensuring compliance with the EU Taxonomy while supporting the global transition to a low-carbon economy.

It is important to underline that SUEZ activities are included in the EU Paris aligned benchmark.

To ensure that investments are allocated to the most relevant and sustainable activities, SUEZ has implemented a capital allocation framework managed jointly by its Strategy and Finance Directions and deployed across all Business Units. Each activity and project undergo a multicriteria assessment, evaluating its contribution to climate transition goals, particularly through infrastructure modernisation, innovative solution deployment, and CCUS technology development.

For each greenfield or brownfield investment, as part of the Operational Committee governance process (OpCom) – where the Executive Committee (ExCom) approves or rejects new investments – the Chief Sustainability Officer plays a key role in ensuring that all projects align with SUEZ Climate Roadmap and sustainability strategy.

Since 2022, SUEZ has demonstrated its commitment to climate resilience and the 1.5°C trajectory through the issuance of Green Bonds, raising a total of €5,493 million. This reflects early achievements and long-term contributions to climate action. The issuance was supported by comprehensive documentation ensuring compliance with the Green Bond Framework in accordance with French financial and European regulatory standards. The framework was independently audited by EY and received a positive second-party opinion from Sustainalytics, a globally recognised ESG ratings and assessment agency. Sustainalytics confirmed that the Company's financing of water and wastewater management systems is expected to mitigate climate change, enhance water security, and reduce pollutant discharge.

Supporting SUEZ core water and waste divisions, the Group has been operating and growing for several years a consulting practice, called SUEZ Consulting. This business provides advisory services to external customers (as well as internal Business Units) on climate change best practices and pathways and has a dedicated "Air and Climate" practice, to help its clients' activities and its own operations enable transition towards a 1.5°C compatible trajectory.

2.3. Impact, risk and opportunity management

2.3.1. Processes to identify material impacts, risks and opportunities (IRO-1)

Risks identification process and the management thereof is central to SUEZ at all levels. SUEZ process for identifying, assessing, and managing environmental impacts, risks, and opportunities can be found in the ⩥ section *2.2.1. Resilience of strategy and business model*.

In a nutshell, the Group business activities directly impact climate change through its GHG emissions generated primarily from water and waste management activities. In terms of risks, SUEZ has identified several climate-related hazards such as floods, heatwaves, and storms, which may disrupt water and waste management services. Using climate scenarios, SUEZ has assessed its exposure and sensitivity to these hazards, particularly at vulnerable sites. SUEZ has also identified transition risks and opportunities associated with the global shift towards a low-carbon economy. SUEZ assessed the impact of regulatory changes, technological shifts, and market demands on its assets and business activities.

The following table presents the climate-related risks, opportunities and impacts identified following the double materiality assessment process.

CLIMATE CHANGE

Subtopic	Code	IRO	Type	SD Roadmap 2023-2027 Commitments
SUEZ, AN ESSENTIAL SOLUTIONS PROVIDER				
Climate change mitigation	IRO-E1-4	Development of new business models aimed at reducing the carbon tax for potential customers who may be affected.	O	Decarbonising SUEZ value chain
Energy	IRO-E1-6	Opportunity to increase SUEZ energy production to meet the demand from customers in the context of transition to a 1,5°C world.	O	Contributing to energy decarbonisation
SUEZ, AN OPERATOR OF INDUSTRIAL EXCELLENCE				
Climate change adaptation	IRO-E1-1	Inability to deliver SUEZ services in the event of flooded drinking water assets, resulting in an average business interruption of 2 days.	I-	Adapting priority and vulnerable sites to climate change
	IRO-E1-2	Flooding and storms resulting in the destruction of assets, damage to goods, business interruption, replacement, and repair costs, etc.	R	
Climate change mitigation	IRO-E1-3	SUEZ activities emit GHG (direct and indirect within its value chain) such as CO_2, CH_4, and N_2O which are emitted into the atmosphere, thereby exacerbating climate change.	I-	Decarbonising SUEZ value chain
Energy	IRO-E1-5	Volatility of energy prices is a risk in the management of SUEZ financial results.	R	Contributing to energy decarbonisation

I+ Positive Impact I- Negative Impact R Risk O Opportunity

MATERIAL POLICIES

- Sustainable Development Roadmap 2023-2027

ACTIONS ON MATERIAL IMPACTS

- Decarbonising its value chain: landfill methane capture, low carbon electricity mix, smart control systems for incinerators
- Helping SUEZ customers to decarbonise: producing alternative fuels from waste, green landfill solutions, CCUS solutions
- Energy: increasing biogas production and energy efficiency, purchase of low carbon electricity and development of PPA
- Adaptation: assessing the exposure and vulnerability of our priority sites to deliver an adaptation plan on all our priority and vulnerable sites

2.3.2. Policies on climate change mitigation and adaptation (E1-2)

As part of its climate policy, SUEZ has adopted the *Sustainable Development Roadmap 2023-2027* which outlines commitments to both climate change mitigation and adaptation.

SUEZ as an essential solutions provider, addresses climate change mitigation by contributing to the low carbon energy transition in communities by increasing its energy production from low carbon energy such as biogas, incineration or green electricity from solar panels (IRO-E1-6).

Additionally, as an operator of industrial excellence, SUEZ addresses climate change mitigation by committing to increasing the share of renewable energy in its total consumption, achieving electricity self-sufficiency in Europe, and reducing its GHG emissions. These efforts not only lower the Group's environmental footprint (IRO-E1-3) but also mitigate exposure to energy price volatility by enhancing energy independence (IRO-E1-5).

These targets are set for 2030, reflecting a medium-term strategic horizon.

Recognising the physical risks posed by climate change, SUEZ is also committed to climate adaptation. By 2027, all priority and vulnerable sites will be adapted to withstand extreme weather events through targeted action plans. This approach enhances resilience for both SUEZ-operated sites and client facilities (IRO-E1-1 and IRO-E1-2), integrating risk management over short-, medium-, and long-term horizons.

As an essential service provider, SUEZ supports clients in their decarbonisation efforts, particularly in sectors potentially impacted by carbon taxation, such as incineration and landfilling (IRO-E1-4). The Group facilitates the transition from disposal to green landfills in emerging markets and promotes advanced waste management solutions, including recycling, plastic extraction, anaerobic digestion, refuse-derived fuel for thermal energy, and the production of renewable and low-carbon molecules for the transport and petrochemical industries. Investments in renewable energy, such as biogas and bioenergy, alongside enhanced energy efficiency measures, are central to this transition, requiring significant capital deployment.

To address natural hazard risks, SUEZ has implemented a natural risk control safety standard that defines the identification, assessment, and management of climate-related threats. This includes exposure to extreme weather events such as storms, floods, seismic activity, and wildfires. Key measures encompass flood risk assessments, flood-resistant infrastructure, protective barriers, emergency response protocols, business continuity planning, and collaboration with insurers to secure adequate coverage. These risk management efforts are continuously reviewed and updated to enhance resilience against evolving climate conditions.

2.3.3. Taking action on climate change mitigation and adaptation (E1-3)

SUEZ has implemented a series of significant actions as part of its climate change mitigation and adaptation strategy. These actions align with the Group targets for reducing GHG emissions, increasing energy efficiency, and adapting to climate risks. Below, SUEZ presents the most impactful actions that took place in 2024.

GHG: decarbonising SUEZ value chain

Reducing SUEZ GHG emissions (IRO-E1-3)/short and medium term

Landfill Methane Capture

Methane is a potent greenhouse gas with a global warming potential (GWP) of 27, meaning that one ton of methane released into the atmosphere is equivalent to 27 tons of CO_2 (IPCC Sixth Assessment Report). While methane emissions from SUEZ activities, such as landfills and anaerobic digestion, are biogenic in origin, they contribute to non-biogenic emissions if released untreated. To mitigate this impact, methane must be captured and combusted, converting it into CO_2 and significantly reducing its climate effect.

SUEZ has deployed advanced methane capture technologies across its landfill sites to minimise fugitive emissions. Through improved landfill covers and optimized biogas collection systems, methane is captured and either flared or converted into renewable energy. A dedicated governance framework oversees methane emissions, ensuring site-specific action plans are implemented, particularly in South Africa, Morocco, and France.

South Africa: SUEZ has invested in expanding biogas networks and enhancing treatment and recovery capacities, leading to a reduction of 37 thousand tons of CO_2eq in 2024 at one site. Another key landfill is undergoing a large-scale methane reduction project, targeting a 50 thousand tons CO_2eq reduction in the short term and an additional 150 thousand tons reduction over the long term. This initiative also pioneers the use of landfill gas for compressed natural gas (CNG) in South Africa through WAGA technology for biogas separation and purification. By monetising the environmental benefits of biomethane recovery, the project creates value for customers and off-takers, enabling scope 1 and scope 3 emission reductions and aligning pricing strategies with these sustainability gains.

Morocco: SUEZ continues to enhance biogas capture at the Meknès landfill, integrating engines to utilise recovered methane for energy production. In 2024, these improvements led to a reduction of 26 thousand tons of CO_2eq.

These initiatives align with SUEZ broader climate strategy, reinforcing its commitment to mitigating methane emissions while generating renewable energy and advancing sustainable waste management solutions.

Low-carbon electricity

To decarbonise its energy consumption, SUEZ has implemented a low-carbon electricity strategy across its European operations. The Group sources green electricity through renewable energy certificates (RECs) and power purchase agreements (PPAs), reducing scope 2 market-based emissions. Additionally, self-generation from biogas recovery systems decreases electricity purchases, cutting both scope 2 location-based and market-based emissions. This initiative supports SUEZ goal of achieving 100% sustainable electricity consumption by 2030 in Europe.

Beyond Europe, China and Australia contribute significantly to scope 2 reductions through national grid decarbonization and increased REC adoption. For example, one of SUEZ large water production facilities has secured renewable energy certificates covering 95% of its electricity consumption.

The transition to a low-carbon electricity mix resulted in a 54 thousand tons CO_2eq reduction in 2024 and is projected to cut emissions by 209 thousand tons CO_2eq by 2030, driven by cleaner national electricity grids and expanded renewable energy sourcing.

Energy efficiency for incinerators

Decarbonisation Levers: Contributing to Energy Decarbonisation | Decarbonising SUEZ Value Chain.

SUEZ energy-from-waste incinerators generate electricity and heat, supplying external clients while also meeting on-site energy needs. To maximize energy output, SUEZ has deployed an energy efficiency action plan aimed at reducing internal consumption and improving production performance. This includes the installation of smart control systems across incineration plants, enabling real-time energy monitoring and optimization. These high-frequency data systems identify inefficiencies and enhance energy generation efficiency.

By improving incineration efficiency, SUEZ reduces both energy consumption and emissions. This initiative is expected to achieve cumulative savings of 25 thousand tons CO_2eq by 2030.

Helping SUEZ customers to decarbonise (IRO-E1-4)/medium term

Producing alternative fuel

- Dongguan Water Group has awarded SUEZ a contract to design, supply, and install advanced technologies and engineering services to construct a large-scale standalone sludge incineration plant. With a capacity to process 2,000 tons of municipal sludge daily, this state-of-the-art facility will serve over 50 wastewater treatment plants across the city of Dongguan, making it one of the largest of its kind in the world. At full capacity, the plant will generate approximately 96 million kWh of local sustainable electricity annually – enough to power 400,000 households for a month – while avoiding 55 thousand tons of CO_2 emissions per year. This project underscores SUEZ and Dongguan Water Group's commitment to sustainable waste management and aligns with China's carbon neutrality objectives.
- In France, SUEZ has commenced construction of a 55 MW power plant that uses solid recovered fuel (SRF) as a low-carbon alternative to coal. SRF is derived from non-hazardous waste collected from businesses and households, undergoing sorting to remove recyclables before being shredded and converted into heat. This heat will replace gas and coal in the production of chemicals and agrochemicals, contributing to significant emissions reductions. With an investment of €130 million – supported by ADEME and Région Grand Est – the Novasteam plant marks a key milestone in the decarbonization of Humens' operations. By eliminating coal usage, the facility is set to cut CO_2 emissions by 60% by the end of 2025. SUEZ is responsible for the design, construction, and operation of the plant, with the first SRF batches expected In Q4 2025 and full operational capacity targeted before year-end 2025.
- Green landfills: SUEZ has implemented its "green landfill" solution across mulitple sites continues to expand this approach to clients not yet equipped. From a climate mitigation perspective, green landfills prioritise maximum biogas capture to minimise methane emissions, achieving capture rates of up to 90%.

SUEZ has a dedicated CCUS team of 15 specialists who actively monitor regulatory and technological developments. The Group is developing innovative, sustainable solutions and forging strategic partnerships across the CCUS value chain to advise clients on optimal carbon reduction strategies and project implementation.

- **United Kingdom:** SUEZ is advancing multiple large-scale CO_2 capture and storage projects within the East Coast Cluster. The objective is to capture up to 900 thousand tons of CO_2 annually from emissions generated by the Tees Valley energy-from-waste facilities operated by SUEZ at Haverton Hill and Wilton. The captured CO_2 will be permanently stored in an aquifer beneath the North Sea. SUEZ has already completed pre-feasibility studies at each site and plans to submit a funding request to the UK government under the Industrial Carbon Capture Track-1 Expansion project.
- **France (Terres d'Aquitaine):** At its Terres d'Aquitaine anaerobic digestion site in the Gironde region, SUEZ has partnered with Prodeval to capture, purify, and repurpose CO_2 from biogas for use in local greenhouses to enhance crop yields. With financial support covering 40% of the project from the Nouvelle-Aquitaine region, the facility is set to begin operations in early 2025, enabling the capture and reutilization of up to 3.9 thousand tons of biogenic CO_2 annually.
- **France (Pau-Lescar Wastewater Treatment Plant):** SUEZ has developed an anaerobic digestion facility at the Pau-Lescar wastewater treatment plant, integrating a catalytic methanation unit. This system recovers all CO_2 from anaerobic digestion and combines it with on-site hydrogen production to generate synthetic gas (e-methane). Eventually, the facility will produce 13,000 MWh of biomethane and e-methane, preventing approximately 5 ktons of CO_2 emissions per year. Methanisation has been in service since 2023 and methanation will be commissioned in 2025.

Energy: contributing to energy decarbonisation

Increasing Biogas Production and Energy Efficiency (IRO-E1-6)/short – medium term

SUEZ has increased biogas production from wastewater sludge treatment to enhance energy self-sufficiency and reduce scope 2 emissions for both its operations and clients. This strategy is being deployed at existing SUEZ plants and integrated into new projects.

- **Pau-Lescar Biofactory, France:** The Pau-Lescar Biofactory exemplifies the integration of anaerobic digestion and methanation technologies in wastewater treatment, converting sludge into biogas used to generate biomethane and e-methane injected into the network.
- **Brno-Modřice Wastewater Treatment Plant, Czech Republic:** Brno Waterworks and Sewerage Company (BVK), a joint venture between the City of Brno and SUEZ (46% stake), has commenced construction on a new sludge treatment line at the Brno-Modřice wastewater treatment plant. This process will fully utilize sludge's energy potential to generate biogas, which will be converted into heat and electricity, covering 65% of the plant's energy needs. Additionally, solar panels will be installed to supply 5% of the plant's electricity consumption.
- **Polish Renewable Gas Market Expansion:** SUEZ has strengthened its position in Poland's renewable gas sector by acquiring a stake in ARA CURSUS, a Polish developer and operator of anaerobic digestion plants. ARA CURSUS has developed a portfolio of nine agricultural biogas projects in partnership with key technology and project stakeholders. Each project is designed to generate approximately 1 MW of renewable electricity. The initiative also includes producing digestate as agricultural fertilizer and using biogas for commercial wood drying.
- **Marseille Biomethane Expansion, France:** Investments by the Metropolis and SERAMM – SUEZ led to the completion of biomethane production expansion in December 2024, reinforcing efforts to build a more sustainable urban environment. The Sormiou biomethane production and injection unit, commissioned in 2019, processes wastewater from 17 municipalities, transforming biogas from sludge digestion into biomethane for injection into the public network. With additional investments, the facility increased biomethane production by 35%, from 27,000 MWh to 37,000 MWh per year.
- **Haliotis 2 Wastewater Treatment Plant, Nice, France:** SUEZ has been awarded the contract for the innovative Haliotis 2 wastewater treatment plant in Nice, designed to meet energy transition goals. The plant will generate 475 MWh of green electricity through a solar farm and 43 GWh of biomethane annually from sludge treatment. The biomethane will be injected into the French natural gas network, providing heating for 11,000 housing units or biofuel for 290 buses. Additionally, excess heat and cooling from wastewater treatment will be recovered to supply a district heating network for 6,500 housing units. The administrative building will be powered entirely by the plant's self-generated electricity.

Transforming waste storage sites into renewable solar power sources and development of PPA (internal + external) (IRO-E1-5)/medium – long term

As a pioneer in energy production from solid waste and wastewater, SUEZ is repurposing its non-hazardous waste storage sites as hubs for renewable solar power generation.

In April 2024, SUEZ signed its first two corporate photovoltaic Power Purchase Agreements (cPPA) with ENGIE. These agreements cover electricity generated from ENGIE's photovoltaic facilities located within SUEZ non-hazardous waste storage sites in Gueltas (West of France) and Vémars (near Paris).

By 2026, SUEZ and ENGIE plan to bring an additional 14 solar photovoltaic facilities into operation, complementing the four existing power-generating sites. These renewable electricity farms will be installed on decommissioned waste storage sites and will have a total capacity of nearly 180 MWp.

This large-scale photovoltaic initiative will supply some of SUEZ industrial water and waste facilities with renewable energy, helping to reduce scope 2 market-based emissions by 9 thousand tons of CO_2eq per year while securing stable energy prices over a 20-year period.

Adapting all priority and vulnerable sites to climate change (IRO E1-1 and E1-2)/ medium and long term

Climate physical risk process

As regards adapting its sites to the consequences of climate change, a project focused on climate change adaptation is currently underway, led by the Sustainable Development Direction and involving the Operations, Risks, and Insurance Directions, along with all Business Units. The initial step was to develop a tool to measure the exposure of each site to the 28 climate-related hazards identified by the EU Taxonomy. The tool covers all sites operated and insured by SUEZ to enable the most exposed sites to prepare an adaptation plan in line with its climate change adaptation target.

The next step is to assess site-level vulnerability to these hazards and subsequently define and implement action plans. In 2024, SUEZ developed a questionnaire designed to evaluate site-level vulnerability. Priority sites have been identified and are required to complete this questionnaire, forming the foundation of their action plans. Additionally, SUEZ has established a vulnerability profile for each of its activities to target the main vulnerabilities. By integrating these two tools, sites have a robust knowledge base to formulate their action plans.

Governance has also been strengthened with specific targets assigned to each Business Unit to ensure the delivery of the expected action plans by the end of 2025.

This process has already enabled 11 priority sites to set up a first action plan and to launch concrete actions with significant results, specifically:

- in South Africa, the installation of temporary capping at the Holfontein and Shongweni landfill sites to reduce the impact of severe rainfall events. The capping has significantly reduced the volume of contaminated storm water stored on site requiring treatment and disposal and it has also reduced infiltration of rainwater contributing to reduced leachate being generated, requiring storage and treatment;
- in China, SUEZ developed wetlands areas to help protect from heavy rainfalls. This has also a benefit on biodiversity. For instance, in Qingdao, with 18% more precipitation than last year, the site experienced five heavy rainstorms during from 2 to 4 hours during which there was no waterlogging. These measures enable the sites to protect themselves and the associated wastewater network.

Additionally, SUEZ offers solutions to help its clients mitigate the effects of climate change by investing in Research & Innovation to continuously design new climate adaptation solutions. For example, these three offerings cover various aspects of SUEZ value chain:

- **Aria Technologies:** SUEZ assists its sites and clients in conducting accurate assessments of their exposure to climate hazards. Aria Technologies, with its team of climate researchers specialising in climate change adaptation and forecasting extreme events such as cold waves, heatwaves, and hurricanes, produces data analyses and predictive maps;
- **AQUADVANCED® Solutions:** SUEZ provides solutions to adapt its plants, particularly in the water sector. The AQUADVANCED® suite enables SUEZ to adapt its infrastructure to significant impacts such as torrential rains, floods, and water stress. For instance, the AQUADVANCED® Urban Drainage solution allows real-time adaptation of rainwater and wastewater networks during flooding to prevent water and soil pollution and better preserve ecosystems. The Catchment and Waterways Operations System (CWOS), developed using SUEZ AQUADVANCED® Urban Drainage, is provided to Singapore's Public Utilities Board (PUB). This system supports PUB in managing the drainage system and tidal gates, monitoring water quality, optimising reservoir operations, and enhancing responses to flash floods. Initially piloted in the Marina Catchment, the platform received positive feedback from users for its insightful dashboards, intuitive interfaces, and operational advisory features that facilitate informed decision-making. Following the successful pilot and since 2019, SUEZ and PUB have expanded the CWOS to cover additional catchments. Last year, the contract was renewed for another four years, extending to 2028;
- **Consulting Expertise:** SUEZ offers specialised consulting services for developing territorial adaptation strategies for its clients, both in France and internationally.

Financial resources

Globally, the actions identified above are estimated to cost around a hundred million euros (combined OpEx and CapEx). This estimate is indicative and may be revised depending on the activity portfolio.

Besides, SUEZ has strategically allocated significant capital and operational expenditures to support the implementation of these actions. In 2024, under the two climate objectives (mitigation and adaptation), 44% of the Group's capital expenditures (CapEx) were classified as taxonomy-eligible, with 19% fully aligned. Additionally, 46% of the Group's operating expenditures (OpEx) were classified as taxonomy-eligible under these objectives, with 15% fully aligned. Refer to the taxonomy chapter in ⩥ sections 13.2.1. and 13.2.2. for more detailed information.

The initiatives described above are part of a broader portfolio of actions that collectively reduced SUEZ overall emissions by 6.2% compared to 2023.

2.4. Metrics and targets

2.4.1. Targets on climate change mitigation and adaptation (E1-4)

Climate change mitigation and adaptation targets

In the *Sustainable Development Roadmap 2023-2027*, SUEZ has set targets aimed at reducing its greenhouse gas emissions and adapting to the physical and transition risks posed by climate change. These targets are essential to support its climate change mitigation and adaptation policies while addressing material climate-related impacts, risks, and opportunities. The ⩥ section *1.3.4. Sustainable Development Roadmap* details how SUEZ developed these targets and the associated analysis on which it relies.

Since the formation of the current SUEZ Group in 2022, one of its first priorities was to define its strategy and establish an associated GHG trajectory. The trajectory, published in January 2023, uses 2021 as the baseline, as it was the last available dataset before the creation of the new Group. This baseline serves as a reference point to measure SUEZ progress and is updated annually to ensure comparability with the year of disclosure. The baseline update follows these principles:

- **acquisitions:** newly acquired sites or contracts are integrated into the baseline by adding their 2021 GHG emissions or, if unavailable, the latest known data (up to the disclosure year);
- **divestments or contract losses:** the baseline is adjusted by removing the corresponding GHG emissions of divested perimeters or lost contracts;
- **data availability:** adjustments are only applied when detailed emissions data is available at the perimeter level.

Before explaining SUEZ targets, this section presents the Group GHG emissions profile, introducing first results of 2024.

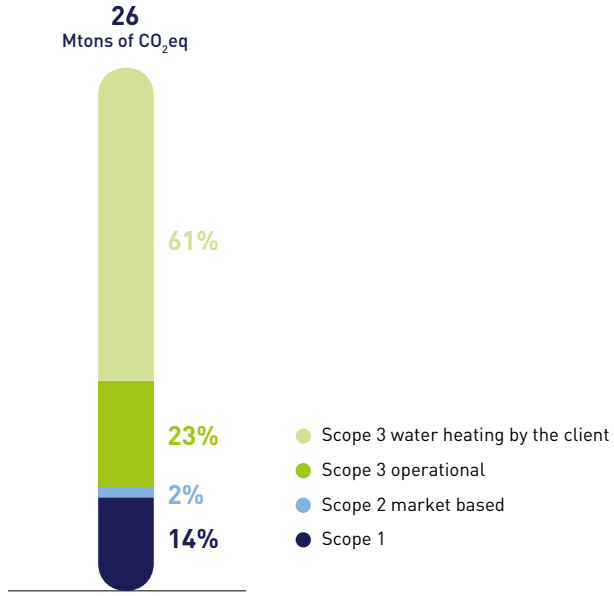
SUEZ voluntarily includes emissions from "use of water by the consumer" (primarily domestic water heating) to present a more comprehensive scope 3 footprint. However, for comparability with other water utilities, SUEZ primarily focuses on its "operational" scope 3, excluding these emissions. Both approaches are presented, but the detailed analysis centers on the operational scope 3.

Similarly, as SUEZ reduction targets are set based on a **market-based** scope 2 approach, detailed results are reported on this basis, while **location-based** scope 2 figures are provided when relevant.

Compared to the previous URD publication, SUEZ has refined its scope 3 operational emissions to include:

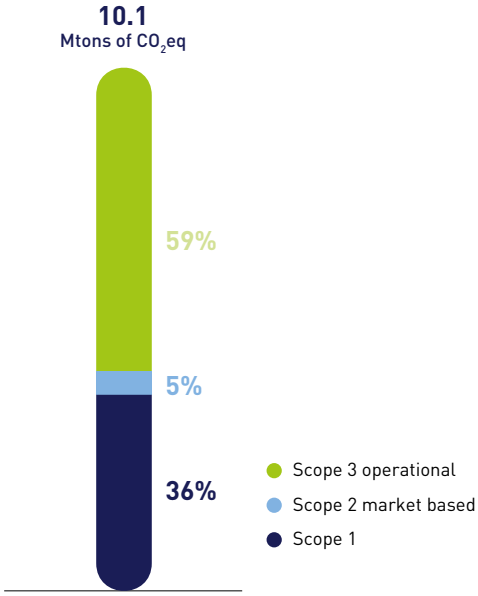
- **emissions from recovered materials** processed by industrial partners further along the value chain, as SUEZ actions can directly impact these emissions;
- **proportional emissions from operated assets not under SUEZ control,** incorporating scope 1, 2, and 3 emissions based on the Group's equity share, reported under the **"Investments"** category.

GHG emissions broken down by scopes – "With water heating" GHG focus – scope 1, 2 "Market Based" and 3 (water heating by the client included)



SUEZ GHG emissions with water heating

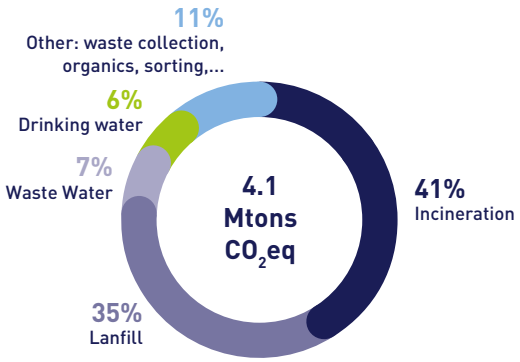
GHG emissions broken down by scopes – "Operational" GHG focus – scope 1, 2 "Market Based" and 3 (water heating excluded)

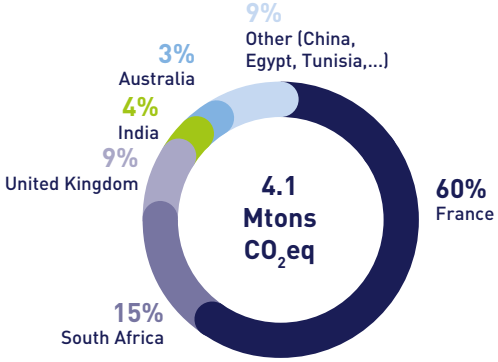


SUEZ operational GHG emissions (without water heating)

Total scope 1 and scope 2 market-based amounts to 4.1 million tons of CO_2 equivalent in 2024. The available information offers a more detailed view broken down by Activity & Geography.

2024 scopes 1&2 market-based emissions generated by SUEZ – View by activity & Geography (Mt of CO_2eq)





2024 SCOPES 1&2 MARKET-BASED EMISSIONS GENERATED BY SUEZ – VIEW BY BUSINESS DIVISION (kt CO_2eq)

Business Division	Scope 1	Scope 2 market-based	Total scopes 1&2 market-based
Water	177	458	635
Waste activity excluding energy-from-waste	1,754	22	1,776
Energy-from-waste	1,694	3	1,698
TOTAL	**3,625**	**484**	**4,109**

SUEZ has set quantitative targets to reduce its GHG emissions for all its activities and geographies with no exclusion.

GHG: decarbonising SUEZ value chain

		Target		Baseline [1]		Results	
Target	Metric	Year	Value	Year	Value	2024	Policy
Reducing GHG scope 1 & 2 (market-based) emissions (IRO-E1-3, IRO- E1-4)	Water activities: GHG scope 1 + scope 2 – ktons of CO_2eq	(2030)	-39%	2021	746	635 (-15%)	SD Roadmap
	Waste (excl. Energy from Waste activities: GHG scope 1 + scope 2 – ktons of CO_2eq	(2030)	-26%	2021	2,145	1,776 (-17%)	SD Roadmap
	Energy from Waste activities: GHG scope 1 + scope 2 – ktons of CO_2eq	(2030)	-2%	2021	1,728	1,698 (-1.7%)	SD Roadmap
	Energy from Waste activities: cumulated investment in carbon capture	(2030)	Tens of millions investment for carbon capture	2023	€1.4 million	€5.5 million	SD Roadmap
Reduce SUEZ scope 3 emissions (IRO-E1-3, IRO- E1-4)	Share of scope 3 covered by GHG mitigation action plans	(2030)	50%	2021	2%	21%	SD Roadmap

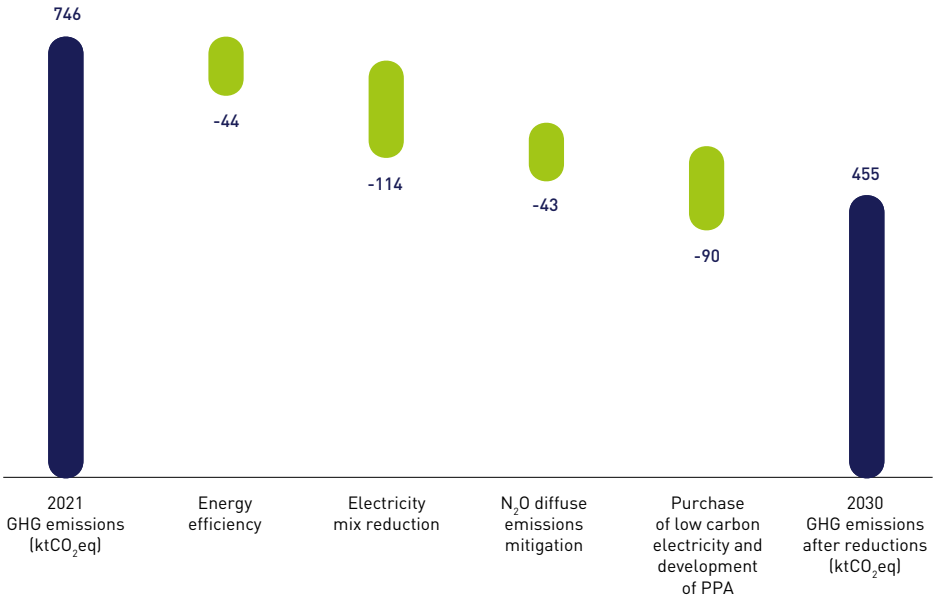
(1) The baseline for these SD Roadmap *indicators had to be adjusted to align with the implementation of the new CSRD operational control accounting rules. 2021 "Pro forma 2024" values are reported here.*

On water activities, as mentioned in ⩥ section *2.2.2. Transition plan for climate mitigation*, SUEZ aims to reduce its scope 1 and 2 (market-based) greenhouse gas (GHG) emissions by 39% by 2030 compared to 2021 levels, a target aligned with a 1.5°C pathway (according to existing climate frameworks [1] when the trajectory was set, a minimum reduction of 37.8% between 2021 and 2030 is required for alignment with a 1.5°C scenario under the absolute concentration approach).

The main levers identified are increasing operational efficiency, utilising renewable energy sources, and investing in technologies that enhance energy efficiency across its water treatment plants.

Water activities (Scope 1 & 2 Market based)	Base year 2021 (*pro forma* 2024)	2030 target	Up to 2050 target
GHG emissions ($ktCO_2eq$)	746	455	In progress
Energy efficiency	-	-44	
Electricity mix reduction	-	-114	
N_2O diffuse emissions mitigation	-	-43	
Purchase of low carbon electricity and development of PPA	-	-90	
GHG emissions after reductions ($ktCO_2eq$)	-	455	

Water activities - GHG Trajectory - ktons CO_2eq



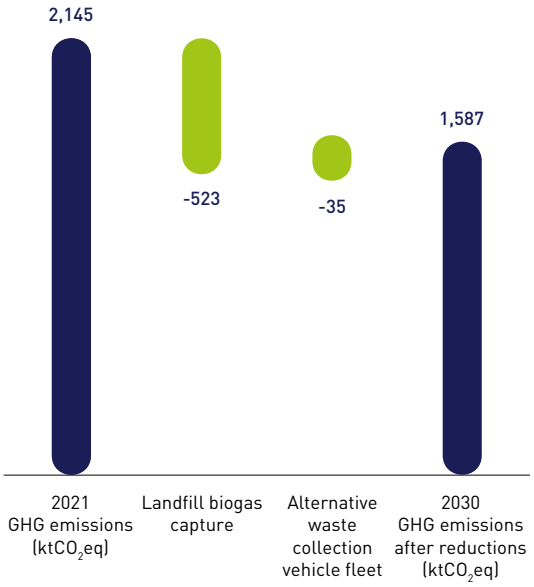
(1) SUEZ used the "Science-based Target Setting Tool".

On waste (excl. Energy from Waste) activities, as mentioned in ⩥ section *2.2.2. Transition plan for climate mitigation*, SUEZ aims to reduce its scope 1 and 2 (market-based) greenhouse gas (GHG) emissions by 26% by 2030 compared to 2021 levels, aligning with a well-below 2°C trajectory (according to existing climate frameworks [1] when the trajectory was set).

The main levers identified are enhanced biogas recovery at landfill sites, fleet electrification, and improving energy efficiency at waste processing facilities.

Waste excl. energy from waste activities (S1 & 2 Market Based)	Base year 2021 (*Pro forma* 2024)	2030 target	Up to 2050 target
GHG emissions ($ktCO_2eq$)	2,145	1,587	In progress
Landfill biogas capture	-	-523	
Alternative waste collection vehicle fleet	-	-35	
GHG emissions after reductions ($ktCO_2eq$)	-	1,587	

Waste excluding incineration activities - GHG Trajectory - ktons CO_2eq

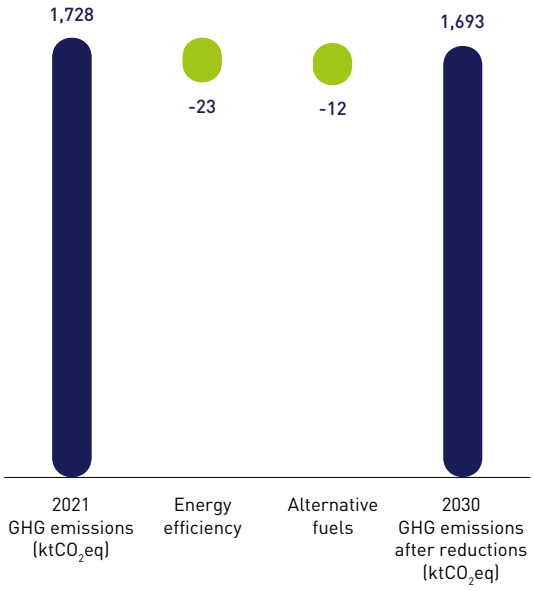


(1) The main levers identified are enhanced biogas recovery at landfill sites, fleet electrification, and improving energy efficiency at waste processing facilities.

Energy from Waste activities: increasing operational efficiency, replacing fuels used during start-up of the burners by renewable fuels and improvement of the environmental performance of its incineration activities through innovation. SUEZ will invest €40 million in its R&D programmes dedicated to carbon capture and sequestration. Reducing Greenhouse gas emissions remains the top priority of SUEZ, and it will be a key contribution to achieve the carbon neutrality targets established in the Paris Agreement. The Intergovernmental Panel on Climate Change estimates that achieving that objective will require, in addition to emission reduction targets, the sequestration of 2 billion tons of CO_2 per year by 2030, rising to 10 billion tons annually by 2050.

Energy from Waste activities (Scope 1 & 2 Market Based)	Base year 2021 (*Pro forma* 2024)	2030 target	...	Up to 2050 target
GHG emissions ($ktCO_2eq$)	1,728	1,693		In progress
Energy efficiency	-	-23		
Alternative fuels	-	-12		
GHG emissions after reductions ($ktCO_2eq$)	-	1,693		

Energy from waste activities - GHG Trajectory - ktons CO_2eq



On scope 3, SUEZ has set a target to identify action plan for more than 50% of its scope 3. No absolute reduction target has been set because SUEZ wanted to identify precise action plans before setting a target.

Energy: contributing to energy decarbonisation

Energy remains a key focus due to geopolitical dynamics, sovereignty considerations, and climate imperatives. Understanding SUEZ role in energy decarbonisation requires an overview of the Group's energy consumption and production.

SUEZ operates as a net energy producer, generating more energy than it consumes. The table below details these figures by activity. While both water and waste activities require energy, the waste sector contributes the most to SUEZ energy production, primarily through energy recovery from waste.

Activity	Energy consumption *(in GWh)*	Energy production *(in GWh)*
Waste	2,410	6,016
Water	2,416	362
TOTAL SUEZ	**4,826**	**6,378**

In terms of geography, most of SUEZ production is in Europe which is the same for its consumption and even in this geography the Group produces more than it consumes.

Geography	Energy consumption *(in GWh)*	Energy production *(in GWh)*
Europe	3,837	6,149
Rest of the world	989	229
TOTAL SUEZ	**4,826**	**6,378**

As an energy producer, SUEZ actively contributes to both energy decarbonisation and the energy self-sufficiency of the regions where it operates. The Group has set the following key targets in its roadmap:

- achieving electricity self-sufficiency for its European operations: Both water and waste activities not only consume but also generate energy through waste and wastewater recovery. By further leveraging waste as a resource, SUEZ aims to produce more electricity than it consumes in Europe and maintain this self-sufficiency over the long term;
- supporting local low-carbon energy transitions: By providing local communities with renewable energy alternatives to fossil fuels and reducing its own energy-related GHG emissions, SUEZ helps accelerate the regional shift toward low-carbon energy systems;
- expanding renewable energy to achieve net-zero by 2050: For communities, increasing renewable energy capacity is also a matter of energy sovereignty. Energy-from-waste solutions play a crucial role by generating local, renewable, or recycled energy. SUEZ is committed to making its own energy consumption more sustainable, increasing the share of sustainable electricity to 70% of the Group's total electricity consumption by 2030, with a target of 100% for electricity consumption in Europe. SUEZ defines sustainable electricity as power sourced from renewable sources or recovered from waste heat at energy-from-waste plants. To achieve this goal, the Group will leverage both its own generation capacities and new renewable electricity supply contracts.

Target	Metric	Target Year	Target Value	Baseline[1] Year	Baseline[1] Value	Results 2024	Policy
Make SUEZ own electricity consumption more sustainable (IRO-E1-3, IRO- E1-5)	Share of sustainable electricity consumption over total electricity consumption (%)	(2030)	Group: 70% Europe: 100%	2021	Group: 29% Europe: 24%	Group: 35% Europe: 32%	SD Roadmap
Maintain European electricity self sufficiency (IRO-E1-6, IRO- E1-5)	Share of electricity production (from waste or renewables) (MWh) over electricity consumption (MWh) in Europe	(2027)	>1	2021	1.04	1.13	SD Roadmap
Contribute to the low carbon energy transition in communities (IRO-E1-6, IRO- E1-3)	Share of GHG avoided from energy production over GHG emitted by energy consumption	(2027)	>1	2021	1.00	1.28	SD Roadmap

(1) The baseline for these SD Roadmap *indicators had to be adjusted to align with the implementation of the new CSRD operational control accounting rules. 2021 "Pro forma 2024" values are reported here.*

Adapting priority and vulnerable sites to climate change

Target	Metric	Target Year	Target Value	Baseline Year	Baseline Value	Results 2024	Policy
Adapt priority and vulnerable sites to climate change (IRO-E1-1, IRO- E1-2)	Share of priority and vulnerable sites with a defined and financed action plan	(2027)	100%	2021	<5%	7%	SD Roadmap

To ensure the resilience of essential services, it is imperative to adapt the most vulnerable infrastructures to the impacts of climate change. Extreme weather events can disrupt the continuity of water, wastewater, and waste services, posing flooding risks to water treatment plants near coastlines and aquatic environments, pollution risks to pumping wells and drinking water production plants during heavy rain, and fire risks to waste treatment sites during droughts. To safeguard these essential services, SUEZ will develop an action plan for 100% of the priority and vulnerable sites it operates by 2027. In the » section *2.3.3. Taking action on climate change mitigation and adaptation*, it is detailed how SUEZ is tackling this challenge.

2.4.2. Energy consumption and production (E1-5)

TABLE PRESENTING ENERGY CONSUMPTION AND MIX IN GWH (AR34)

Energy consumptions related to own operations	2023 (*pro forma* 2024)	2024	% N/N-1
TOTAL ENERGY CONSUMPTION	**4,899**	**4,826**	**-1.5%**
Total Fossil Energy consumption	**N.D**	**2,251**	**-**
Fuel consumption from coal and coal products	N.D	0	-
Fuel consumption from crude oil and petroleum products	N.D	1,144	-
Fuel consumption from natural gas	N.D	220	-
Fuel consumption from other fossil sources	N.D	208	-
Consumption of purchased or acquired electricity, heat, steam, or cooling from fossil sources	N.D	679	-
% of fossil consumption	*N.D*	*47%*	-
Total Renewable Energy consumption	**1,245**	**1,357**	**9%**
Fuel consumption from renewable sources	N.D	851	-
Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources	N.D	480	-
Consumption of self-generated non-fuel renewable energy	N.D	27	-
% of renewable consumption	*N.D*	*28%*	-
Total Nuclear Energy consumption	**N.D**	**1,218**	**-**
TOTAL ENERGY PRODUCTION	**6,166**	**6,378**	**3%**
Total Non Renewable Energy production	**2,064**	**2,317**	**12%**
Waste incineration (heat and electricity, fossil fraction: 50%)	2,064	2,317	12%
% of fossil production	*33%*	*36%*	-
Total Renewable Energy production	**4,102**	**4,061**	**-1%**
Biogas from landfill, WWTP and organic digestors (converted into electricity, heat or injected)	1,919	1,684	-12%
Waste incineration (heat and electricity, renewable part from biomass: 50%)	2,064	2,317	12%
Other renewables (solar, turbine, geothermal...)	119	60	-50%
% of renewable production	*67%*	*64%*	-

In addition to this table:

- 100% of SUEZ revenue is considered to originate from High Climate Impact Sectors (HCIS). The energy intensity for SUEZ in 2024 is 525 MWh per million euros of revenue.
- 100% of the contractual energy certificates purchased in 2024 and considered in scope 2 GHG emissions reporting are unbundled.

2.4.3. Gross scopes 1, 2, 3 and Total GHG emissions (E1-6)

TABLE PRESENTING TOTAL GHG EMISSIONS DISAGGREGATED BY SCOPES 1 AND 2 AND SIGNIFICANT SCOPE 3 IN kt CO_2eq (AR 48)

	Retrospective				Target	
GHG emissions *(ktons of CO_2eq)*	Base year (2021) *pro forma* 2024	2023 *pro forma* 2024	2024	% N/N-1	2030	Annual % target/ Base year
Gross scope 1	3,989	3,720	3,625	-2.6%	- [1]	-
Percentage of scope 1 emissions form regulated emissions trading schemes *(in %)*	N.D	N.D	8%	-	-	-
Gross location-based scope 2	885	534	513	-3.9%	-	-
Gross market-based scope 2	630	658	484	-26.4%	- [1]	-
Gross scope 3 WITH water Heating	N.D	N.D	21,925	-	-	-
Gross scope 3 WITHOUT water Heating	N.D	N.D	6,033	-	-	-
3.1 Purchased goods and services	N.D	N.D	1,179	-	-	-
3.2 Capital goods	N.D	N.D	275	-	-	-
3.3 Fuel and Energy related activities (not includes in scope 1 and 2)	N.D	N.D	239	-	-	-
3.4 Upstream transportation and distribution	N.D	N.D	273	-	-	-
3.5 Waste generated in operations	N.D	N.D	1,071	-	-	-
3.6 Business travel	N.D	N.D	13	-	-	-
3.7 Employee commuting	N.D	N.D	43	-	-	-
3.8 Upstream leased assets	N.D	N.D	Not relevant for SUEZ	-	-	-
3.9 Downstream Transportation	N.D	N.D	37	-	-	-
3.10 Processing of sold products	N.D	N.D	1,540	-	-	-
3.11 Use of sold Product – Water heating by the client	N.D	N.D	15,893	-	-	-
3.11 Use of sold Products – Alternative Fuels	N.D	N.D	184	-	-	-
3.11 Use of sold products – Organic fertilizers	N.D	N.D	172	-	-	-
3.12 End of life of sold products	N.D	N.D	Not relevant for SUEZ	-	-	-
3.13 Downstream leased assets	N.D	N.D	Not relevant for SUEZ	-	-	-
3.14 Franchises	N.D	N.D	Not relevant for SUEZ	-	-	-
3.15 Investments	N.D	N.D	1,008	-	-	-
TOTAL GHG LOCATION BASED (WITHOUT WATER HEATING)	**N.D**	**N.D**	**10,171**	**-**	**-**	**-**
TOTAL GHG MARKET BASED (WITHOUT WATER HEATING)	**N.D**	**N.D**	**10,142**	**-**	**-**	**-**

(1) SUEZ has set targets per activity for its scopes 1&2 but not divided by scope 1&2.

8% of SUEZ scope 1 emissions were subject to ETS regulations. This percentage is attributable to the recently acquired Biosteam co-incineration facility in Le Havre, which falls under the EU-ETS framework, and two landfills in South Africa which are under the South African Carbon Tax.

TABLE PRESENTING GROSS SCOPES 1, 2, 3 AND TOTAL GHG EMISSIONS – FINANCIAL AND OPERATIONAL CONTROL (kt CO_2eq) – (E1-6 PARAGRAPH 50)

	Financial control and operational control	Emissions Incoming from Joint Ventures
Gross scope 1	3,625	0
Gross scope 2 Location-Based	513	0
Gross scope 2 Market-Based	484	0
Gross scope 3 without water heating	6,032	659
Gross scope 3 with water heating	21,925	3,110

The financial consolidation perimeter of SUEZ is identical to that of the operational control one.

TABLE PRESENTING GROSS SCOPES 1, 2, 3 (WITH WATER HEATING) ACCORDING TO THE GHG PROTOCOL FORMAT (kt CO_2eq) – (E1-6 PARAGRAPH 50)

GHG protocol #	CO_2 *(in kt CO_2eq)*	CH_4 biogenic *(in kt CO_2eq)*	N_2O *(in kt CO_2eq)*	Other (including HFC, SF6...) *(in kt CO_2eq)*	Total *(in kt CO_2eq)*
1-1	1,711	0	7	0	1,718
1-2	267	0	0	0	267
1-3	0	5	141	0	147
1-4	0	1,489	0	4	1,493
2-1	484	0	0	0	484
2-2	0	0	0	0	0
3-1	1,179	0	0	0	1,179
3-2	275	0	0	0	275
3-3	239	0	0	0	239
3-4	273	0	0	0	273
3-5	1,002	61	9	0	1,071
3-6	13	0	0	0	13
3-7	43	0	0	0	43
3-8	0	0	0	0	0
3-9	37	0	0	0	37
3-10	1,463	0	77	0	1,540
3-11	16,248	0	0	0	16,248
3-12	0	0	0	0	0
3-13	0	0	0	0	0
3-14	0	0	0	0	0
3-15	1,008	0	0	0	1,008

TABLE PRESENTING GHG INTENSITY PER NET REVENUE (AR 54)

GHG intensity per net revenue	2023 (*pro forma* 2024)	2024	% N/N-1
Total GHG emissions sc1&2 (location-based) per net revenue *(in $tCO_2eq/€M$)*	478	450	-6.0%
Total GHG emissions sc1&2 (market-based) per net revenue *(in $tCOE_2eq/€M$)*	492	447	-9.3%

GHG **emissions intensity** of SUEZ, calculated as total GHG emissions per million euros of revenue, decreased by -9.3% in 2024 compared to previous year.

PERCENTAGE OF GHG SCOPE 3 CALCULATED USING PRIMARY DATA (AR 46 G)

Metric	2024
% of GHG scope 3 calculated using primary data	65%

BIOGENIC EMISSIONS (AR 43 C, AR 45 E, AR 46 J)

	Results		
Metric	Waste 2024 *(in ktons CO_2eq)*	Water 2024 *(in ktons CO_2eq)*	Total 2024 *(in ktons CO_2eq)*
Biogenic emissions of CO_2 from the combustion or bio-degradation of biomass not included in scope 1 GHG emissions	3,124	1,613	4,737
Biogenic emissions of CO_2 from combustion or bio-degradation of biomass not included in scope 2 GHG emissions	9	16	25
Biogenic emissions of CO_2 from combustion or bio-degradation of biomass that occur in value chain not included in scope 3 GHG emissions	75	0	75
TOTALS	**3,208**	**1,629**	**4,837**

In parallel to fossil emissions, SUEZ monitors its scope 1 biogenic emissions. As a reminder, biogenic emissions are part of the natural carbon cycle (biomass decomposition or combustion) and are distinct from anthropogenic CO_2 emissions, which result from human activities such as burning fossil fuels. This is why by convention they are accounted separately. These types of emissions are presented here for pedagogic purposes and to provide order of magnitudes. The main source of biogenic CO_2 is the biomass fraction contained in the waste that is incinerated within SUEZ own facilities. This biomass, when energetically recovered, serves as a source of renewable energy for final consumers. The second source of biogenic carbon arises from pollution reduction processes within water treatment systems operated, often attributed to microbiological activity. This function is essential for purifying water before its return to the environment or reuse. Other sources include various activities such as waste degradation in landfills, secondary activities related to wastewater treatment.

2.4.4. Internal carbon pricing (E1-8)

In 2024, SUEZ introduced an internal carbon pricing mechanism to drive low-carbon investments and integrate climate-related risks into its decision-making processes. The primary approach used was a shadow pricing model, which is embedded in capital expenditure, operations, R&D, and strategic planning. SUEZ adopted the IPCC's recommended carbon price of €127 per ton of CO_2. The carbon pricing mechanism varies by business sector, reflecting each sector's exposure to carbon tax, and is used to assess potential risks related to current and future carbon taxes. SUEZ also evaluates the carbon cost per activity to forecast medium- and long-term profitability, guiding strategic decisions and investment choices for specific activities and assets.

2.4.5. Metrics methodology regarding climate change

Reporting perimeter coverage

The CSRD Regulation aims to align financial and non-financial reporting scopes. To meet this requirement, every financial entity consolidated in the Group's financial results must collect relevant non-financial data if deemed material. A site is considered material if its activities significantly impact the Company's sustainability performance and revenue or if it is exposed to sustainability-related risks and opportunities.

This rule applies regardless of how long the entity operated during the reporting year. In previous sustainability reporting under the NFPS (non-financial performance statement), data integration was only required if the entity had been under SUEZ operational control for at least six months.

For this sustainability statement, all financial entities within SUEZ Business Units and Business Partners (such as support services, innovation, etc.) were assigned a dedicated environmental reporting entity or included within a broader reporting structure. No entities were excluded based on scope parameters (financial consolidation, size, geography, activity...).

Metrics Accounting rules

As part of the "operational control" analysis required by the European Sustainability Reporting Standards (ESRS) E1, that applies to specific data points such as GHG emissions, an entity is considered under SUEZ operational control if "the undertaking has the ability to direct the operational activities and relationships of the entity, site, operation, or asset," regardless of ownership. In line with the guidance provided by EFRAG, SUEZ considers that its operational control perimeter is aligned with its financial control one.

Based on its understanding of the available guidance and in the absence of benchmarks for this first year, SUEZ elected to include in its scopes 1&2 third-party GHG emission of assets associated with contracts or sites it does not own as long as they are part of a consolidated entity. This includes third-party assets under:

- operation and maintenance (O&M) contracts;
- concession contracts, where SUEZ operates the asset but does not own it.

For assets under SUEZ operational control:

- metrics are fully included, regardless of SUEZ ownership share.

For assets not under SUEZ operational control:

- metrics are included proportionally to the equity share in the case of Joint Operations;
- metrics are either excluded or accounted for under scope 3 (GHG emissions) in the case of Joint Ventures;
- metrics are not included if the entity is not financially consolidated.

This change in the accounting rules had an impact on SUEZ 2024 metrics compared to previous years

Indeed some entities (part of Asian perimeter and some UK incineration plants) previously consolidated into SUEZ energy figures and GHG emissions are no longer included in scopes 1&2 nor in energy consumption or production due to their Joint venture status.

Standard used

SUEZ uses the "GHG Protocol" methodologies to account for GHG emissions, ensuring comprehensive and transparent reporting that aligns with global standards. The GHG inventory of SUEZ includes scope 1, 2, and 3 emissions, incorporating direct operational emissions, energy-related emissions, and value chain emissions.

All the gases required by the GHG protocol (Kyoto Protocol) are accounted within this statement and converted into one single unit: tons of CO_2 equivalent (CO_2eq).

Definitions and data used

- **Scope 1 GHG emissions** corresponds to SUEZ direct emissions. They were calculated based on the sites actual operational data which includes: the amount of fuels combusted by vehicles or sites, direct emissions from processes (fossil CO_2, CH_4, N_2O, incoming from waste incineration, composting, or wastewater treatment plant activities…) and refrigerant leaks. The emission factors used came from several sources including official national databases (Base Carbone, DEFRA…), private databases (Ecoinvent, etc.), scientific and intercompany working group (EPE, ASTEE, etc.) or internal calculation tools developed by SUEZ thanks to it's expertise (O2C, CO2pilot).
- **Scope 2 emissions** of SUEZ were calculated using both location-based and market-based methods. Market based scope 2 is calculated according to the GHG protocol hierarchy, the use of energy certificates and supplier emission factor prioritized; for entities that do not buy green energy SUEZ uses the residual mix of the country provided by the IAB. This approach ensures that all non-renewable energy is accounted for, in compliance with GHG Protocol guidance.
- **Scope 3 emissions,** which represent the upstream and downstream impacts of the operations of SUEZ, are critical for understanding its full carbon footprint. Each category of scope 3 emissions was assessed using primary data and associated specific emission factor when possible and spend-based or average data methods when direct data was unavailable.
- **Biogenic emissions:** biogenic emissions are part of the natural carbon cycle (biomass decomposition or combustion) and are distinct from anthropogenic CO_2 emissions, which result from human activities such as burning fossil fuels. This is why by convention they are accounted separately from the gross scope 1, 2 and 3. The main source of biogenic CO_2 is the biomass fraction contained in the waste or wastewater treated by SUEZ. Emission factors are derived from the same data bases used than scope 1 & 2 & 3.
- **Avoided emissions:** avoided emission measures the positive impact of a company's activities in reducing emissions for its clients or partners. They are calculated by comparing emissions from a reference scenario (the standard practice, such as using fossil fuels or virgin raw materials) with a solution scenario (the Company's alternative, such as biogas or secondary raw materials). In 2024, SUEZ calculated its avoided emissions by comparing its solutions to the most common alternative: the use of fossil fuels and virgin materials.

GHG Baseline recalculation and *pro forma* values

Due to annual changes in the organisational perimeter – such as mergers, acquisitions, and commercial shifts that result in the addition or loss of sites – some KPIs require baseline updates to accurately reflect these changes. These updates are essential because SUEZ targets are set relative to the 2021 baseline. This is particularity the case for GHG scope 1 & 2 reduction targets.

Adjusting the baseline helps account for perimeter changes (e.g., winning or losing significant contracts), ensuring that progress toward targets is not distorted by newly integrated or divested entities. The revised values are referred to as *pro forma* values.

Values from years prior to 2024 were audited as part of the annual NFPS exercises; however, they were not audited as recalculated *pro forma* values.

Methodological continuous improvements

In addition to the expanded reporting boundaries due to acquisitions, SUEZ made several improvements to its GHG accounting methodology continuously to ensure more accurate and transparent reporting of its full value chain emissions.

These changes include:

- for scope 3 since 2023:
  - accounting for emissions from the transformation of sold materials by clients,
  - inclusion of water produced but not distributed by SUEZ in the scope 3 category for the use of sold products,
  - reclassification of capital goods following GHG Protocol guidelines;
- for scope 3 since 2024:
  - exclusion as requested by the GHG protocol of the combustion emissions of waste sent to third parties energy from waste facilities that deliver their electricity to the countries grid (to avoid double counting emissions already accounted in scope 2, it is the case in France and in the UK),
  - accounting for emissions from SUEZ land spread compost and fertilization materials under the *3.11 Use of sold products* category, rather than the *3.5 Waste generated* category, to align with the status of these volumes as outflows rather than waste (see ESRS E5 Circularity),
  - integration of Engineering and Construction (E&C) products delivered within the reporting year to the client and not operated by SUEZ in the future into the category *3.11 used of sold products* category.

3

POLLUTION (E2)

According to the sustainability reporting standards, this chapter aims to understand:

a) the impact of SUEZ activities on pollution – specifically in relation to air, water, and soil – by identifying material positive and negative actual or potential impacts;

b) the actions implemented by SUEZ to prevent or mitigate actual or potential negative impacts, as well as the outcomes of these measures in managing associated risks and opportunities;

c) SUEZ strategic and business model adaptation in response to the transition toward a sustainable economy, ensuring alignment with pollution prevention, control, and elimination objectives.

The nature, type, and extent of material risks and opportunities related to pollution impacts and dependencies, as well as the preventive, control, and mitigation strategies implemented by SUEZ. This includes compliance with regulatory requirements and how SUEZ actively manages these factors to ensure a sustainable and responsible approach to pollution reduction. Through its activities, SUEZ actively addresses multiple forms of pollution, ensuring both environmental protection and public health preservation:

- avoid pollution of **drinking water:** this is the **Drinking Water Production** process, delivered through the construction and operation of drinking water treatment plants (DWTP). This includes managing water resources and implementing protective measures against accidental pollution. Without these processes, contamination of drinking water could pose severe public health risks, as remains the case in certain developing regions;
- avoid pollution by **wastewater within cities:** this is the **Wastewater Collection** process, delivered though the building and operation of sewer networks. often integrating stormwater management solutions to mitigate pollution risks in cities. This process is essential in preventing the contamination of untreated drinking water sources (such as wells) and the spread of waterborne diseases;
- avoid pollution of **rivers, lakes and seas:** this is the **Wastewater Treatment** process. SUEZ eliminates pollutants before discharge into natural water bodies. Traditionally, this includes removing organic matter (measured by BOD and COD) to prevent oxygen depletion (anoxia). Advanced treatment processes now also target nutrients like nitrogen and phosphorus, and in some cases, microorganism disinfection – especially in touristic regions or for water reuse applications. Future challenges include tackling emerging pollutants such as pesticides and microplastics;
- avoid urban pollution by **solid wastes within cities:** this is the **Solid Waste Collection** process. SUEZ ensures that cities remain free from unmanaged waste, which can otherwise attract pests, spread disease, and create serious public health hazards, particularly in developing countries;
- avoid **nature pollution through solid and liquid waste** elimination: this is the **Recycling and Recovery** process. SUEZ promotes a circular economy by prioritising sustainable waste management practices:
  - recycling plants – Sorting waste to enable material reuse in new products Composting – converting organic waste into agricultural compost,
  - energy-from-waste plants – using incineration to generate renewable energy,
  - landfilling – though still practiced in some regions, landfilling is considered a last-resort solution.

For these processes, SUEZ primarily operates as a service provider, managing treatment facilities and related infrastructure on behalf of public utilities. Additionally, through its Engineering and Construction Division, SUEZ designs and builds new treatment facilities, supporting global efforts toward sustainable pollution prevention and resource management. As a result, SUEZ activities have a net positive impact on the reduction of pollution across air, water, and soil (➤ see IRO-E2-2). SUEZ strategy and business model is fully aligned with the EU Action Plan *"Towards a Zero Pollution for Air, Water and Soil"*. Stricter pollution regulations create additional opportunities for SUEZ to leverage its expertise in environmental services. The Group also plays a crucial role in developing countries, where access to potable water and sanitation services remains a pressing challenge. By providing cost-effective solutions, SUEZ contributes to improving public health and environmental protection on a global scale.

As a champion in environmental services, SUEZ upholds the highest standards in pollution risk management, ensuring that its own depollution activities do not create unintended environmental impacts. The Group prioritises service continuity and accident prevention, implementing rigorous safety protocols to mitigate any incidental pollution risks associated with its operations.

Furthermore, innovation remains a core pillar of SUEZ strategy. The Company's long-standing commitment to research and development has demonstrated that technological advancements, driven by evolving regulatory requirements, are key to addressing ever-emerging pollution challenges. In this context, SUEZ actively researches and develops solutions for tackling emerging pollutants, including:

- micropollutants;
- microplastics;
- PFAS (per- and polyfluoroalkyl substances);
- POPs (persistent organic pollutants).

By continuously adapting its technologies and expertise, SUEZ remains at the forefront of protecting both people and the environment from the harmful effects of pollution, while reinforcing its position as a trusted partner for sustainable environmental solutions worldwide.

3.1. Impact, risk and opportunity management

3.1.1. Processes to identify impacts, risks and opportunities (IRO-1)

SUEZ global approach regarding pollution

SUEZ is deeply committed to identifying, managing, and mitigating pollution-related risks and impacts across its global operations and value chain. Operating in over 40 countries and managing thousands of facilities – including water treatment plants, pumping stations, and waste management sites – SUEZ has implemented a rigorous pollution control framework to ensure compliance, efficiency, and sustainability in its day-to-day operations.

Stakeholder engagement, compliance, and reporting

As an operator of permitted environmental protection installations, SUEZ actively engages with its clients, local authorities, regulatory bodies, and local communities to align its operations with environmental and societal expectations. The Company maintains transparency by collaborating with stakeholders on key concerns such as:

- odour management;
- pollution risk mitigation;
- recommendations from insurance risk prevention engineers;
- regulatory requirements and compliance standards.

In its depollution activities, SUEZ ensures strict adherence to environmental regulations. Compliance with standards across various regulated parameters is periodically reported to clients and regulatory authorities in accordance with permit conditions and legal frameworks.

Additionally, to maintain a comprehensive overview of its environmental performance, SUEZ conducts annual internal assessments, consolidating insights from global surveys and reports, including:

- **Drinking Water Quality Report** (DWQR) – evaluates the quality of drinking water produced and distributed under SUEZ contracts;
- **Wastewater Quality Report** (WWQR) – assesses the performance of wastewater treatment contracts in ensuring compliance with water quality standards;
- **Air Quality Report** (AQR) – monitors and reports atmospheric emissions from energy-from-waste (UVE) facilities.

Through proactive stakeholder engagement, strict regulatory compliance, and transparent performance reporting, SUEZ continues to strengthen its pollution management framework, ensuring that its operations contribute positively to environmental protection and sustainability worldwide.

Environmental and Industrial Risk management (EIR)

To prevent and mitigate the accidental pollution risks, SUEZ employs a structured Environmental and Industrial Risk (EIR) process This framework assesses the level of environmental and industrial risk control in relation to SUEZ operational guidelines, ensuring that potential hazards are identified, managed, and minimised across all business activities.

- Each Business Unit (BU) appoints an environmental and industrial risk officer (EIRO) responsible for overseeing risk management at site level, ensuring alignment with SUEZ safety and environmental protocols. **Incident reporting & Analysis:**
  - accident reports include various incident categories, all of which are reported to the Health, Safety, and Environment (HSE) Direction;
  - **HIPO incidents** (high potential gravity incidents) and severe accidents receive particular attention;
  - **pollution-related accidents** – such as fires at waste management sites or major chlorine leaks at water treatment facilities – are reported by EIROs and analysed annually by the SUEZ HSE Direction.
- **Environmental risk indicators,** such as notifications of non-compliance from regulatory authorities and any resulting sanctions (fines) are reported by BUs and consolidated at HQ level to track performance and drive improvements. **The IRM database & risk management software:**
  - the Industrial Risk Management (IRM) system, covering around 5,000 sites, is designed to screen facilities and business activities for industrial and environmental risks related to pollution. Three key phases are integrated into the IRM process:
    1) Assessment Preparation:
       - selection of relevant sites through consultation between Business Units, insurance experts, and Corporate teams,
       - launch of a self-assessment campaign, with automated surveys based on declared site activities,
    2) Self-Assessment & Risk Evaluation:
       - site managers complete risk assessment questionnaires,
       - based on responses, automated recommendations are generated,
    3) Action Planning & Continuous Monitoring:
       - mitigation plans are developed in collaboration with site management, prioritizing the most critical recommendations,
       - regular progress reviews and updates – at least annually – are conducted using the IRM application,
       - IRM ratings are calculated based on questionnaire responses, complemented by insights from insurance and internal audits.

Through this comprehensive EIR framework, SUEZ ensures proactive risk management, enabling the early detection, reporting, and mitigation of pollution-related industrial risks while fostering continuous improvement in environmental and safety performance.

The importance of innovation

Through its expertise centres, such as CIRSEE in the western Paris region, SUEZ proactively anticipates regulatory requirements by developing future-oriented solutions that exceed the current standards imposed by laws and regulations. This approach aims to achieve superior levels of performance and safety.

Surpassing these requirements involves the implementation of innovative technologies that enhance environmental, social, and operational outcomes. SUEZ investment in research and development for advanced pollution treatment technologies not only addresses specific needs in sensitive environments but also positions the Group to offer market-leading solutions with improved environmental performance. For instance, the mastery of membrane filtration – originally developed for industrial applications – has now been successfully adapted for municipal water treatment processes, exemplifying how innovation drives both efficiency and sustainability.

Identification of material pollution impact, risks, and opportunities

In alignment with European sustainability reporting standards, SUEZ has undertaken a double materiality assessment (DMA) to systematically identify impacts, risks, and opportunities (IROs) related to pollution across its operations. The DMA process involved a comprehensive analysis of how SUEZ activities interact with the environment, particularly in relation to air, water, and soil pollution. This assessment included:

- Expert Consultations: Engaging technical specialists and operational managers with deep knowledge of the Group's activities to assess critical interactions between SUEZ sites and their surroundings;
- Risk and Opportunity Evaluation: Examining how pollution-related factors impact both SUEZ business strategy and the wider environment;
- Activity-Specific Considerations: Taking into account the different nature of pollution risks and mitigation strategies across water, wastewater, and waste management operations.

The detailed description of the DMA process, including the consultation methodology and key findings, is presented in » section 1.3.1. of this document, as part of compliance with ESRS 2. By conducting this in-depth materiality assessment, SUEZ ensures that pollution-related risks, impacts, and opportunities are effectively identified, managed, and integrated into its broader sustainability strategy, reinforcing its commitment to environmental responsibility and regulatory compliance.

POLLUTION

Subtopic	Code	IRO	Type	SD Roadmap 2023-2027 Commitments
SUEZ, AN ESSENTIAL SOLUTIONS PROVIDER				
Pollution of air	IRO-E2-1	Despite strict monitoring and the use of best available techniques to manage atmospheric discharges from Energy from Waste (EFW) facilities, occasional exceedances of thresholds can occur. Public perception of incinerators emissions remains predominantly negative, presenting reputational challenges.	R	Include thermal treatment to remove micropollutants in 100% of commercial proposals for sanitation infrastructure construction
Pollution of water	IRO-E2-3	By providing wastewater and waste treatment services, SUEZ actively mitigates pollution of natural, aquatic, and marine environments.	I+	
Pollution of soil	IRO-E2-4	The conversion of landfills into "green landfills" (with biogas recovery, leachate treatment and possibly solar panels) has positive effects on the environment and on public health at local level.	I+	
Substances of concern and very high concern	IRO-E2-6	The introduction of new regulations targeting the reduction of micropollutants, including PFAS and microplastics, presents a growth opportunity. By aligning with these standards, SUEZ can update its contracts and expand its market presence.	O	
SUEZ, AN OPERATOR OF INDUSTRIAL EXCELLENCE				
Pollution of water	IRO-E2-2	In the event of heavy rainfall, or where water infrastructures are missing or undersized, wastewater networks can overflow, and this untreated water can be discharged into the environment, with a potential negative impact on nature and local communities.	I-	Contribute to reducing the land artificialisation pace
Pollution of soil	IRO-E2-5	The potential for liability from ancient soil pollution on old landfills could harm the Group's reputation.	R	

I+ Positive Impact I- Negative Impact R Risk O Opportunity

MATERIAL POLICIES

- Sustainable Development Roadmap 2023-2027
- SUEZ Statement of Purpose
- Health, Safety, and Environmental Risks Policy
- Sustainable Purchasing Charter

ACTIONS ON MATERIAL IMPACTS

- Pollution avoidance
- Pollution reduction
- Pollution control

3.1.2. Policies regarding pollution elimination and control (E2-1)

As a leader in environmental services, pollution control is a core mission for SUEZ, and responsibility for this critical activity is embedded at all levels of management, from the CEO to field managers. This ensures a top-down commitment and an operational focus on environmental protection across all business units. To reinforce the importance of environmental protection, SUEZ has developed and implemented key statements and policies, which reflect the interests of stakeholders and outline the Group's strategic direction in sustainability. These policies, developed through collaborative working groups and endorsed by the CEO, include:

- SUEZ *Statement of Purpose*;
- SUEZ *Sustainable Development Roadmap 2023-2027*;
- SUEZ *HSE Policy*.

By institutionalizing these commitments, SUEZ ensures that pollution control is not only a regulatory obligation but a strategic priority, aligned with stakeholder expectations and global sustainability goals. *SUEZ Statement of Purpose* is made available to stakeholders through SUEZ web site.

SUEZ Statement of Purpose

The Group's dedication on pollution control is firmly integrated into the ***Statement of Purpose*:**

Faced with growing environmental challenges, each day, for more than 160 years, we have been acting in support of our clients and partners to deliver essential services that protect and improve the quality of life wherever we operate.

United by a passion for our work as well as our inclusive culture and team spirit, we innovate to conserve water and create value from wastes, in the form of recycled materials and energy. We promote and implement responsible behaviours, more efficient technologies, and circular solutions to recycle and make the best possible use of the finite resources of the Earth. Deeply rooted in our communities, we are committed to providing people and the planet with the resources for a common future.

Aligned with the *Statement of Purpose*, SUEZ has established the *Health, Safety, and Environmental Risk Policy* (*HSE Policy*) and *Sustainable Development Roadmap 2023-2027*. Both policies are fully integrated across all of the Group's activities and operations, covering the entire value chain – both upstream and downstream. This holistic approach guarantees that pollution control, sustainability, and health & safety considerations extend beyond SUEZ direct operations to include partners, subcontractors, and suppliers.

SUEZ Sustainable Development Roadmap

SUEZ has embedded pollution prevention and control into its operational strategy as a core component of its *Sustainable Development Roadmap 2023-2027*. This policy takes a proactive approach to pollution mitigation by reducing harmful emissions and preventing pollutants from entering natural environments. As part of its commitment to pollution elimination, SUEZ has set specific targets that impact both its own operations and its broader value chain, including:

Reducing land artificialisation pace, contributing to sustainable land use and biodiversity conservation Integrating thermal treatment for micropollutant removal in 100% of commercial proposals for sanitation infrastructure construction, ensuring higher standards for water treatment For further details on the *Sustainable Development Roadmap 2023-2027*, please refer to ⩥ section *1.3.4. Sustainable Development Roadmap 2023-2027* of this Sustainability Statement. A general description of Group policies is provided in ⩥ section *1.3.3. Cross-cutting material Group policies*.

SUEZ HSE Policy

Health, Safety, and Environmental Risks Policy (*HSE Policy*) is built around the Group's overarching goal of "Zero Severe and Fatal Accidents" across all operations. It establishes a clear framework for pollution prevention and environmental risk management, reinforced by SUEZ HSE Standards. To translate these commitments into actionable practices, SUEZ has developed a structured set of operational guides, including:

- HSE Manual;
- HSE Management Rules;
- HSE Standards;
- HSE Practical Guide.

At the Business Unit (BU) level, SUEZ has implemented Environmental and Quality Management Systems, which are generally ISO 9000 and ISO 14000 certified. These systems include specific procedures tailored to different environmental activities, ensuring compliance with local regulations and best practices. SUEZ policies, guides, and operational procedures address both mitigating negative environmental impacts and preventing pollution-related incidents. If incidents do occur, control measures are in place to limit their impact on people and the environment.

Key aspects of SUEZ pollution control and risk mitigation strategy include:

- strict adherence to HSE Standards to prevent air, water, and soil pollution;
- life-saving rules and emergency action plans to reduce risks and ensure swift response;
- continuous feedback and knowledge-sharing to improve best practices and strengthen environmental safety.

This comprehensive approach ensures that pollution prevention, control, and emergency preparedness are embedded at every level of SUEZ operations, reinforcing the Group's commitment to sustainability and environmental protection.

SUEZ Environmental and Industrial Risks Operating Rules

SUEZ has developed internal **Environmental and Industrial Risks Operating Rules** to establish proactive pollution prevention and control measures across all its facilities and operations. These rules focus on risk assessment, pollution source identification, and strict monitoring to ensure compliance with stringent legal thresholds for air and water quality. Key elements of this framework include:

- risk assessments to identify potential pollution sources and implement mitigation measures;
- continuous monitoring and analysis of air and water effluent quality against strict regulatory standards;
- spill containment systems and regular groundwater inspections to prevent contamination.

The framework consists of 12 operational rules, each supported by practical guides that outline specific risk management practices. Examples of these sub-guides include:

- "Secondary Containment for Polluting Substances" – ensuring safe storage of hazardous materials;
- "Managing Emergency Situations" – establishing response protocols for pollution incidents;
- "Risk Control Measures" – implementing best practices for pollution prevention;

"Fire Prevention and Protection" – mitigating risks of fire-related pollution events. SUEZ is currently standardising these guidelines to align with its HSE management framework, ensuring a uniform approach to environmental risk management across all operations. To manage incidents and minimize negative impacts, SUEZ has implemented emergency procedures that include:

- automated alert systems for rapid incident detection,
- containment measures to prevent the spread of pollutants,
- coordination with local authorities to ensure an effective response,
- comprehensive training programmes to equip staff with the necessary skills to handle emergencies,
- real-time monitoring to detect anomalies and take immediate corrective action.

By integrating these preventative and responsive measures, SUEZ strengthens its ability to safeguard air, water, and soil quality, ensuring compliance with environmental regulations and reinforcing its commitment to sustainability and pollution control.

SUEZ Sustainable Purchasing Charter

SUEZ integrates sustainability into its procurement processes through its SUEZ integrates sustainability into its procurement processes through its *Sustainable Purchasing Charter*, ensuring a responsible, resource-efficient, and resilient supply chain. The Company actively collaborates with suppliers to limit environmental impact by promoting sustainable sourcing, pollution prevention, and responsible chemical management. For more details, please refer to ⩥ section *6.1.1. Policies in regarding resource use and circular economy*, ensuring a responsible, resource-efficient, and resilient supply chain.

The Company actively collaborates with suppliers to limit environmental impact by promoting sustainable sourcing, pollution prevention, and responsible chemical management. For more details, please refer to ⩥ section *6.1.1 Policies in regarding resource use and circular economy*. At the local level, SUEZ takes targeted measures to limit, prevent, and substitute harmful substances in its operations. Procurement practices are designed to avoid products with known pollutant properties, enforcing strict supplier requirements to ensure compliance with local regulations and contractual quality standards regarding substances of concern. Leveraging its expertise in advanced treatment technologies, SUEZ actively works to reduce pollutant discharges into the environment. Hazardous substances are characterized using safety data sheets (SDS), subject to rigorous controls to assess environmental and health risks. The Company also applies strict engineering standards for safe storage and transportation, including the use of double-walled tanks, secondary containment systems, and monitored piping to prevent leaks and accidental releases.

Through this comprehensive procurement and risk management framework, SUEZ reinforces its commitment to sustainability while minimizing environmental risks, ensuring compliance with regulations without requiring a group-wide pollutant-specific policy.

Public regulations

SUEZ operates in strict compliance with European and international regulations, ensuring that all water and waste management services meet the highest environmental and quality standards. Regulatory requirements are applied in accordance with each country's legal framework, guaranteeing adherence to national and regional policies. The key regulatory texts include:

- the European Industrial Emission Directive (IED);
- the French Environmental Code including ICPE Regulation (French regulation dedicated to permitted Installation for Environmental Protection);
- the European Drinking Water Directive;
- the European Urban Wastewater Directive.

3.1.3. Taking action on pollution elimination and control (E2-3)

As outlined in the introduction, all SUEZ activities are fundamentally linked to pollution elimination and control. These efforts are prioritised as follows:

1. to avoid pollution through the prevention of pollution at the source;
2. to reduce pollution by minimising the emission of pollutants;
3. to control pollution by managing the impacts of regular activities and incidents.

The following section highlights recent actions related to the material IROs identified. These examples illustrate the Group's ongoing initiatives in addressing pollution prevention, reduction, and control.

Air pollution control

- Compliance with atmospheric emissions (IRO-E2-1) is consistently monitored at the site level using advanced technologies and is controlled based on permits, with regular third-party audits (including internal audits, ISO 14001 audits, and inspections by authorities).
- Improving Air Quality in the Balearic Islands (IRO-E2-1): SUEZ has deployed 150 smart sensors across five ports in the Balearic Islands to monitor air quality, noise pollution, and weather variables. The data collected is analysed in real-time using the AirAdvanced® Sentinel platform, providing insights and early warnings to improve air quality. Key benefits include real-time impact assessment, data visualisation, and emission reduction strategies, enhancing the quality of life for port users and nearby residents.
- Regulatory compliance (IRO-E2-1): SUEZ facility improvement programmes prioritise compliance with both local, national, European regulations, and internal standards. Specifically, for Energy from Waste (EfW) plants in France, the implementation of the revised BREF incineration (Best available techniques reference) has facilitated continuous monitoring of mercury levels in each line, improved NOx treatment in certain plants, reduced daily Emission Limit Values (ELVs) under normal operating conditions, enhanced management of emissions during non-normal operating conditions (OTNOC), and enabled the measurements of new pollutants.
- Studies of Diffuse Emissions (IRO-E2-1): SUEZ has implemented the SCAN360 system to detect and reduce emissions of volatile organic compounds (VOC) at industrial sites. This technology identifies 90% of reducible emissions from just 0.1% of components, optimising leak detection and reduction programmes. The system's flexibility also allows for drone deployment, improving safety and accessibility. Additionally, the SCAN360 Quick-Scan provides precise measurements of methane and CO_2, improving emission management and compliance with international standards.
- Construction of the First SRF Heat Generation Unit (IRO-E2-1): SUEZ, in partnership with Tereos, is currently constructing the first solid recovered fuel (SRF) heat generation unit in Hauts-de-France. Set to become operational by 2027, this facility will replace 40% of the fossil gases used at the Origny-Sainte-Benoite sugar refinery-distillery. The project will process non-recycled waste into energy, reducing landfill usage and supporting the circular economy. It will also create 150 construction jobs and 50 permanent positions, thereby contributing to local economic development.

Water pollution control

- The Biofactory of Pau-Lescar (IRO-E2-3): SUEZ is transforming the Pau-Lescar wastewater treatment plant into a positive-energy Biofactory, producing 10 green resources and energies. This project incorporates groundbreaking technologies such as catalytic methanation and hydrothermal carbonisation, significantly increasing biomethane production while reducing sludge volume. In addition to its technological innovations, the Bio-factory will support local biodiversity and environmental education through an integrated architectural and landscape design.
- Valorising Sewage Sludge (IRO-E2-3): SUEZ converts sewage sludge into valuable resources, contributing to energy autonomy, renewable energy development, and decarbonisation. Solutions such as thickening, dehydration, drying, methanation, and incineration allow for the production of renewable energy and fertilizers. Additionally, innovative technologies like biochar production help reduce greenhouse gas emissions. This approach aligns with circular economy principles, promoting sustainable agriculture and minimising environmental impact.
- Infrastructure upgrades for extreme rainfall events (IRO-E2-2): To prevent untreated water discharge during extreme rainfall events, SUEZ invests in infrastructure upgrades and proactive risk management. Self-monitoring devices and rainy weather spill indicator have been developed to enhance detection and response. Recognising the impacts of soil artificialisation – such as reduced rainwater infiltration and pollution from runoff (e.g., hydrocarbons washed from roads) – SUEZ promotes local water infiltration in France. By implementing solutions that restore natural water cycles, SUEZ reduces contamination risks to both soil and water, enhancing resilience in urban and industrial landscapes.
- Optimise Wastewater Management (IRO-E2-3): SUEZ AQUADVANCED® system optimises wastewater and stormwater network management, reducing pollution from overflows and mitigating flood risks. By integrating weather data, sensor information, and AI-driven analytics, it anticipates and prevents flooding, ensuring high-quality discharge. Real-time monitoring and 72-hour weather forecasts improve decision-making, minimise service disruptions, and reduce environmental impact. This advanced system supports public health and environmental protection through precise, data-driven network management.
- SUEZ is conducting per- and polyfluoroalkyl substances (PFAS) analyses (IRO-E2-6) across approximately 200 sites to assess regulatory impacts and develop an actionable plan at Group level, ensuring preparedness for future regulatory requirements.

Soil pollution control

- Regulatory compliance (IRO-E2-5): Through its solid waste management activities, SUEZ contributes to soil pollution prevention and control by ensuring regular monitoring, adherence to standards, and comprehensive waste management strategies. Measures include enhanced waste acceptance protocols to prevent unauthorised or high-risk materials from entering landfill facilities, soil impermeabilisation where waste is stored, and rehabilitation and post-closure monitoring of landfill sites to ensure long-term environmental protection.
- Addressing soil pollution (IRO-E2-2): SUEZ provides comprehensive depollution solutions to restore contaminated land for safe and sustainable use. The Group employs advanced in-situ and ex-situ soil remediation techniques to treat industrial pollutants and hazardous waste. One of its major projects involved the decontamination and sustainable redevelopment of the Metaleurop Nord site in Pas-de-Calais, France. This initiative transformed a heavily polluted area into a thriving economic zone by removing 190,000 tons of hazardous waste and creating an Ecopole for environmental activities. The redevelopment has generated nearly 400 jobs and how houses facilities for waste sorting, soil treatment, and industrial effluent management, contributing to both local economic growth and environmental restoration in alignment with EU sustainability goals.
- Restoring landfill sites (IRO-E2-3): SUEZ actively restores landfill sites to support sustainable energy generation and risk-compliant operations. In 2024, photovoltaic panels were installed at non-hazardous waste storage facility sites in France. In Morocco, biogas recovery systems were implemented in Meknes to generate renewable electricity, while in Rabat, SUEZ has undertaken remediation efforts for older landfill phases. These initiatives are carried out under the Company's "Green Landfill" commercial offer, demonstrating its commitment to sustainable waste management and energy transition.

3.2. Metrics and targets

3.2.1. Targets regarding pollution elimination and control (E2-3)

The table below indicates SUEZ targets related to the material IROS selected.

For SUEZ, pollution-related targets are both mandatory, as required by legislation, and voluntary.

Mandatory targets (targets e and f below) include compliance with regulations such as the European Urban Wastewater Treatment Directive revised in 2022, European Pollutant Release and Transfer Register (E-PRTR), Directive 2010/75/EU of the European Parliament on industrial emissions, so called IED (integrated pollution prevention and control).

In addition, SUEZ has established clear targets aligned with its *HSE policy* (targets a, b and c below). These targets are designed to ensure "Zero Severe and Fatal Accident" outcomes, demonstrating a commitment to stringent pollution prevention and environmental risk management.

Other voluntary targets are related to emerging pollutants (target d).

		Target		Baseline		Results		
Target	Metric	Year	Value	Year	Value	2023	2024	Policy
Zero Severe Accident in relation to air pollution	Number of severe accidents	2025	0	2021	0	0	0	HSE Policy
Zero Severe Accident in relation to water pollution	Number of severe accidents	2025	0	2021	0	0	0	HSE Policy
Zero Severe Accident in relation to soil pollution	Number of severe accidents	2025	0	2021	0	0	0	HSE Policy
Include thermal treatment to remove micropollutants in 100% of commercial proposals for wastewater infrastructure construction	Number of proposals with such commitments/ total number of WWTP proposals	2027	100%	Waiting for the definition of areas, to be defined by an incoming wastewater EU Regulation			50%	SD Road map
Notifications on non- compliance with regulation	Number of non-compliance issues notified by the environmental Authorities related to pollution matters	2025	70	2023	69	69	77	HSE Policy
Fines for non-compliance with regulation	Number of fines received from environmental Authorities related to pollution matters	2025	10	2023	14	14	9	HSE Policy

The following table indicates the link between IROs and indicators/target:

IRO	Target
IRO-E2-2	b. Zero severe accident in relation to water pollution e. Target on non-compliance issues notified by the Environmental Authorities related to pollution matters f. Target on number of fines received from Environmental Authorities related to pollution matters
IRO-E2-3	No target (linked to Business Development opportunities)
IRO-E2-1	a. Zero severe accident related to air pollution e. Target on non-compliance issues notified by the environmental Authorities related to pollution matters f. Fines received
IRO-E2-5	c. No severe accident related to soil pollution e. Non-compliance notified f. Target on number of fines received from environmental Authorities related to pollution matters
IRO-E2-6	d. Number of proposals with micropollutants removing commitments/total number of WWTP proposals

More information on the methodology for the establishment of targets related to the *SD Roadmap* can be found in » section *1.3.4. Sustainable Development Roadmap 2023-2027*.

3.2.2. Pollution of air, water, and soil (E2-4)

SUEZ core business is centred on reducing pollution in water, soil, and air through its various activities. In urban environments, the Group's teams contribute to air and soil pollution reduction by providing solid waste collection services, while water pollution is mitigated through the supply of drinking water and the collection of wastewater. While these services are considered standard in developed countries, they remain insufficient in developing regions, leading to significant public health challenges. To support nature and biodiversity conservation, SUEZ ensures that urban pollution collected in cities is properly treated before being released into the environment. Wastewater treatment transforms pollutants into energy or valuable compost, while solid waste treatment involves anaerobic processing in dedicated landfills or, in developed countries, conversion into new products through recycling or energy recovery.

SUEZ acknowledges that while its operations have a net positive impact on public health and the environment, they also contribute to residual pollution emissions. This chapter provides insights into the residual emissions generated by depollution facilities operated by SUEZ, including microplastics. In line with European sustainability reporting standards, these emissions are referenced against the pollutants listed in Annex II of Regulation (EC) no. 166/2006 (European Pollutant Release and Transfer Register – E-PRTR Regulation) concerning emissions to air, water, and soil. Greenhouse gas (GHG) emissions are addressed separately in accordance with ESRS E1 Climate Change.

Synthesis of the E-PRTR material pollutant for SUEZ

This report presents the list of residual pollutants that exceeds the E-PRTR threshold according to the site size by business activity.

Pollution of water

The Group's wastewater business aims to reduce up to an acceptable level for the receiving bodies the pollutants present in collected wastewater.

The usual parameter used for wastewater treatment control is biological oxygen demand (BOD). The respect of threshold on BOD, measuring degradable organic matters, is fixed by authorities according to the nature and sensitivity of the receiving body (river, lake, sea...). Other parameters include COD (chemical organic demand), measuring total organic matters, and SS (suspended solids). Wastewater treatment also include targets on nitrogen (under different forms) and Phosphorous. Nitrogen and phosphorus, if in exceedance, create "eutrophication" of water bodies.

More recently, the standards for wastewater treatment have included parameters on microbiology and micropollutants and will include eventually in the future standards on microplastics and PFAS.

Each wastewater treatment plant obeys to its specific regulation, determined by authorities according to the specificity of the receiving body.

It must be noted that Regulation (EC) no. 166/2006 of the European Parliament and of the Council (European Pollutant Release and Transfer Register "E-PRTR Regulation") does not cover Urban Wastewater treatment activities (covered by other directives) and therefore the reference to Annex II E-PTR thresholds for these activities required by European sustainability reporting standards should be considered as indicative only.

Regarding these thresholds, three parameters are "relevant" to wastewater treatment plant activities:

- **total organic carbon (TOC) (total C or COD/3):** the threshold indicated in E-PRTR is 50,000 kg/year of Total Organic Carbon, equivalent to 150,000 kg/year of COD. For a wastewater treatment compliant with a 125 mg/l outlet standard (usual), this threshold corresponds to a 22,000-population equivalent (PE) capacity. In 2024, 60 wastewater plants operated by SUEZ exceeded the 50,000 kg/year threshold;
- **total nitrogen:** the threshold indicated in E-PRTR is 50,000 kg/year of Total Nitrogen. For a wastewater treatment compliant with a 15 mg/l outlet standard (usual), this threshold corresponds to a 60,000-population equivalent (PE) capacity. In 2024, 35 urban wastewater plants operated by SUEZ exceeds this 50,000 kg/year threshold;
- **total phosphorus:** the threshold indicated in E-PRTR is 5,000 kg/year of Total Phosphorus. For a wastewater treatment compliant with a 10 mg/l outlet standard (usual), this threshold corresponds to a 46,000-population equivalent (PE) capacity. In 2024, 48 urban wastewater plants operated by SUEZ exceeds this 5,000 kg/year threshold.

Regarding solid waste treatment activities, the facilities have no or low wastewater releases. On landfills, a leachate treatment is managed according to local regulation. Therefore, no facility exceeds the E-PRTR water thresholds.

Pollution of air

SUEZ waste management operations may release the following pollutants into the air during energy-from-waste activities:

- carbon monoxide (CO);
- sulfur oxides (SO_x);
- nitrogen oxides (NO_x);
- particulate matters;
- ammonia (NH_3);
- total organic carbon (COT);

- hydrogen chloride (HCl);
- fluorine;
- mercury (Hg);
- cadmium (Cd);
- zinc (Zn);
- dioxins and furans (PCDD/PCDF).

SUEZ monitors these emissions to ensure compliance with environmental standards.

According to the methodology described above, the following parameters were determined to be exceeding the E-PRTR air thresholds:

- nitrogen oxides (NO_x/NO_2): in 2024, 6 SUEZ operated facilities exceed the 100,000 kg/year threshold;
- cadmium and compounds (as Cd): in 2024, 3 SUEZ operated facilities exceed the 10 kg/year threshold;
- mercury and compounds (as Hg): in 2024, 1 SUEZ operated facility exceeds the 10 kg/year threshold;
- dioxins & Furans (PCDD + PCDF): in 2024, 1 SUEZ operated facility exceeds the 0,0001 kg/year threshold;
- zinc and compounds (as Zn): in 2024, 5 SUEZ operated facilities exceed the 200 kg/year threshold.

Regarding water treatment activities, no pollutant in exceedance to E-PRTR air threshold are released by the water and wastewater facilities operated by SUEZ.

Pollution of soil

No pollutant in exceedance of E-PRTR threshold is released to soil by any of the Group's activities.

Emissions data

The following table presents the material pollutants emitted from the operations in line with the European Sustainability Reporting Standards. Data are collected following the Group annual reporting process throughout the entire operational perimeter.

Division	Type of facility	Parameter	Receiving environment	E-PRTR Threshold in kg/year	Number of sites with threshold overpass	2024 emissions in tons
Water treatment activities	Wastewater Treatment	Total organic carbon (TOC) (as total C or COD/3)	Water	50,000	60	54,225
		Total nitrogen	Water	50,000	35	23,548
		Total phosphorus	Water	5,000	48	2,734
Solid waste tratment activities	Energy From Waste	Nitrogen oxides (NO_x/NO_2)	Air	100,000	6	1,243
		Mercury and compounds (as Hg)	Air	10	1	0.260
		Chlorine and inorganic compounds (as HCl)	Air	10,000	0	0
		Cadmium and compounds (as Cd)	Air	10	3	0.053
		Zinc and compounds (as Zn)	Air	200	5	2.09
		Ammonia (NH_3)	Air	10,000	0	0
		PCDD + PCDF (dioxins + furans) (as Teq)	Air	0.00010	1	0.000000313

3.2.3. Emerging pollutants: microplastics, substances of concern, substances of very high concern, and PFAS (E2-5)

Microplastics

Microplastics are defined as plastic particles smaller than 5 mm, present in various environmental compartments such as soils, waters, air, biota, placenta, and human blood. They are categorised as either primary – intentionally added – or secondary, resulting from the fragmentation or abrasion of larger plastic items. The presence of toxic substances within these particles has raised significant environmental and health concerns.

Regulatory frameworks are under development to address these issues, with the European Commission targeting a 30 per cent reduction in microplastic release by 2030. Proposed regulations aim to restrict both intentional and unintentional microplastics, covering areas including drinking water, sewage sludge, and the release of industrial plastic pellets into the environment.

The future regulatory impact on SUEZ activities remains uncertain; however, such measures are globally regarded as opportunities in the context of increasingly stringent environmental standards. Currently, limited data on microplastics in sewage sludge, plastic recycling processes, landfills, and runoff water presents challenges in responding to institutional inquiries. Additionally, the contribution of environmental contamination from these sources is not well studied. Furthermore, the complexity of analytical methods for identifying microplastics poses significant challenges. Addressing these gaps is vital for understanding and mitigating the impact of microplastics within SUEZ activities and ensuring alignment with forthcoming regulations.

In response, SUEZ is advancing research through its dedicated Research and Development centres, focusing on refining analytical methods to extract and analyse microplastics from different environmental matrices. By engaging closely with scientific experts, SUEZ will continue to monitor and comply with future regulatory objectives aimed at reducing microplastic pollution.

SOCs and SVHC

Substances of concern (SOCs) are chemicals known or suspected to have adverse effects on human health – particularly carcinogenic or mutagenic effects – or the environment, especially those classified as persistent, bioaccumulative and toxic (PBT). These chemicals are found in a wide range of products, including plastic materials, paints, fire extinguishers, and laboratory reagents.

Given that SUEZ activities encompass the management of wastewater and solid waste, including hazardous waste, efforts to reduce or eliminate SOCs are integral to its operations. In this domain, SUEZ complies with all relevant regulations pertaining to these substances.

Substances of very high concern (SVHC) are defined under the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) legislation, and are included in the Candidate List of substances of very high concern for Authorisation, as published in accordance with Article 59(10) of the REACH Regulation.

SUEZ is not a producer of any substances included in this Candidate List.

Given that SUEZ operations encompass the management of wastewater and solid waste, including hazardous waste, all activities inherently incorporate measures to reduce or eliminate substances of concern (SOCs).

PFAS

Among substances of concern, per- and polyfluoroalkyl substances (PFAS) comprise a large class of synthetic chemicals widely used across society. Due to their resistance to degradation, PFAS are increasingly detected in the environment, often far from their original point of release. Several PFAS are included on the REACH Candidate List of substances of very high concern (SVHC).

In France, current regulations mandate the identification and reporting of PFAS presence. The order dated 31 October 2024 (NOR: TECP2429403A) is designed to enhance the monitoring of atmospheric emissions from facilities carrying out thermal waste treatment. Under this order, operators are required to measure the presence of 49 specific PFAS substances and hydrogen fluoride (HF) in their atmospheric discharges, thereby improving understanding of the thermal destruction of these compounds and their environmental impact.

Although no specific thresholds for PFAS emissions have yet been published, SUEZ remains proactive in PFAS research. The Group's priority has been the development of an analytical methodology to detect and quantify a significant number of PFAS in water. This method currently detects 65 molecules – exceeding the 20 targeted by European regulations – and is applicable to drinking water, water resources, and wastewater. The current challenge is to detect and quantify PFAS levels in sewage sludge, leachate, incinerator fumes, and other industrial discharges, in order to develop appropriate treatment solutions in response to potential regulatory changes.

In addition, SUEZ is advancing new analytical techniques, including bioassays, to assess PFAS content and their holistic impacts. These bioassays may eventually complement existing molecule-by-molecule analyses, despite the increasing complexity associated with continuous improvements in detection technologies.

SUEZ is also addressing concerns over the presence of PFAS in firefighting foams used at certain facilities. For some of these substances, a ban has been decided but is yet to come into force. SUEZ is actively collaborating with suppliers to substitute the affected foam concentrates and facilitate their eventual elimination.

In France, current regulations emphasize the identification and reporting of PFAS presence. As such, the purpose of the order of 31 October 2024 (NOR: TECP2429403A) is to strengthen the monitoring of atmospheric emissions of PFAS from facilities carrying out thermal waste treatment. The order requires the operators concerned to measure the presence of 49 specific PFAS substances and hydrogen fluoride (HF) in their atmospheric discharges, in order to improve knowledge of the thermal destruction of these compounds and their environmental impact.

3.2.4. Financial effects from material pollution-related risks and opportunities (E2-6)

In 2024, SUEZ did not experience any incidents that resulted in significant pollution of the natural environment. Consequently, the Group did not incur any operational or investment costs associated with major incidents or deposits.

3.2.5. Metrics methodology regarding pollution

Reporting perimeter coverage

The CSRD regulation aims to align financial and non-financial reporting scopes. To meet this requirement, every financial entity consolidated in the group's financial results must collect relevant non-financial data if deemed material. A site is considered material if its activities significantly impact the company's sustainability performance and revenue or if it is exposed to sustainability-related risks and opportunities.

This rule applies regardless of how long the entity operated during the reporting year. In previous sustainability reporting under the NFPS (Non-Financial Performance Statement), data integration was only required if the entity had been under SUEZ operational control for at least six months.

For this sustainability statement, all financial entities within SUEZ Business Units and Business Partners (such as support services, innovation, etc.) were assigned a dedicated environmental reporting entity or were included within a broader reporting structure. No entities were excluded based on scope parameters (financial consolidation, size, geography, activity, ...).

However, only certain activities were selected for ESRS E2 metric disclosure because they are more likely to generate residual pollution compared to other activities. It is important to note that this pollution is not produced by SUEZ itself but originates from the waste and wastewater entrusted to SUEZ for treatment technologies. These activities include waste incineration, landfills with biogas recovery, and wastewater treatment plants.

Metrics accounting rules

As part of the "operational control" analysis required by the European Sustainability Reporting Standards (ESRS) E2 that applies to specific data points such as pollutants, an entity is considered under SUEZ operational control if "the undertaking has the ability to direct the operational activities and relationships of the entity, site, operation, or asset," regardless of ownership. In line with the guidance provided by EFRAG, SUEZ considers that its operational control perimeter is aligned with its financial control one.

Based on its understanding of the available guidance, SUEZ elected to include third-party assets associated with contracts or sites it does not own as long as they are part of a consolidated entity. This includes third-party assets under:

- operation and maintenance (O&M) contracts;
- concession contracts, where SUEZ operates the asset but does not own it.

For assets under SUEZ operational control:

- metrics are fully included, regardless of SUEZ ownership share.

For assets not under SUEZ operational control:

- metrics are included proportionally to the equity share in the case of Joint Operations;
- metrics are excluded in the case of Joint Ventures or not financially consolidated entities.

Pollutant materiality assessment methodology

The E-PRTR list of relevant pollutants to be reported by SUEZ activities has been determined using two filters to determine materiality:

- **Filter 1: Regulatory requirement** – If a pollutant is not mandated by national or local regulations, it is considered non-material. SUEZ prioritises compliance with legal requirements, and pollutants not asked by such regulations are often not followed because considered not relevant according to the law. In some cases, even if pollutants are regulated nationally, specific sites may be exempt from reporting obligations due to their size;
- **Filter 2: Proportionality proof for exemption** – If a pollutant release is proven to be proportional to the site's main activity metrics (e.g., volume or tons treated) and if the site's metrics are at least 20% below the disclosure threshold, then the site can be excluded from reporting.

Definitions and data used

Water pollutants: The data provided comes from the continuous sites outlet analysis system of the wastewater treatment plants. For two specific contracts being commissioned in 2024 the values were extrapolated based on average incoming pollution flows.

Air pollutants: The data comes from either a continuous surveillance system (for instance: Non-Dispersive Infrared Sensors, Fourier Transform Infrared Spectroscopy...) or periodic sampling. Periodic measurements are extrapolated to represent a full year using chimney flow rate measurements.

WATER AND MARINE RESOURCES (E3)

Water is critical to SUEZ operations and managing its use and preservation is integral to mitigating risks and seizing opportunities in a changing climate. By 2025, water stress is projected to impact two-thirds of the global population, underscoring the need for proactive measures.

While the *Pollution* section describes the way SUEZ prevents water pollution and treats wastewater, the *Biodiversity and ecosystems* section presents SUEZ policies and actions related to preservation and regeneration of ecosystems, including aquatic and marine. The *Affected communities* and *Consumers and end-users* sections provide details on SUEZ approach to water quality and access to water for all. To avoid redundancies, this section focuses on quantitative issues, in terms of water consumption and savings.

WATER

Subtopic	Code	IRO	Type	SD Roadmap 2023-2027 Commitments
SUEZ, AN ESSENTIAL SOLUTIONS PROVIDER				
Water & Marine Resources	IRO-E3-2	**SUEZ contributes to reducing pressure on water resources, through its solutions for reducing losses, recharging groundwater, reusing water, and desalinating seawater.**	I+	Limit the Group's impact on fresh water.
	IRO-E3-3	**Deployment of SUEZ solutions in areas where there is no or insufficient supply/coverage (drinking water production, wastewater treatment, reuse, recharge, desalination).**	O	
SUEZ, AN OPERATOR OF INDUSTRIAL EXCELLENCE				
Water & Marine Resources	IRO-E3-1	**Water stress leads to changes in water consumption behaviours, generating conflicts of uses and a potential loss of revenue for the Group.**	R	Limit the Group's impact on fresh water.

I+ Positive Impact I- Negative Impact R Risk O Opportunity

MATERIAL POLICIES

- Sustainable Development Roadmap 2023-2027
- Human Rights Policy
- Health, Safety & Environmental Risks (HSE) Policy
- Resource Use and Circular Economy Policy
- Sustainable Purchasing Charter

ACTIONS ON MATERIAL IMPACTS

- New business models to promote water preservation
- Reduce the use of water through efficiency measures
- Reclaim and reuse water
- Provide services in all contexts

4.1. Impact, risk, and opportunity management

SUEZ has conducted a screening of its assets and activities related to both waste and water business to identify actual and potential impacts, risks, and opportunities related to water and marine resources. This screening covers operations, and the upstream and downstream value chain.

Please refer to ➢ section *1.3.2. Double materiality assessment results* for additional information.

More specifically looking at water related IROs, SUEZ has evaluated location-specific risks, using Water Risk Atlas (WRI Aqueduct).

SUEZ assessed over 1,200 facilities (representing 55% of SUEZ total water withdrawals and 55% of discharges), including water treatment, wastewater treatment, and waste treatment sites, with significant water consumption. The enterprise risk management (ERM) framework integrates water-related considerations, ensuring insights from GPS mapping and exposure modelling to inform both operational (own operations and delegated by clients) and supplier risk assessments. It covers both physical and transition risks, as they are interrelated and place-based specific (as illustrated by IRO-E3-1).

For IRO-E3-1, 336 among the 1,200 assessed facilities are in high or extremely high-water stress risk areas, as documented on Aqueduct. IRO-E3-2 and IRO-E3-3 consider all types of Aqueduct documented risks as opportunities to promote SUEZ solutions and to deliver positive impact for local stakeholders.

In its supply chain, SUEZ screens in priority suppliers with significant water dependencies located in high-risk areas, like "water for sale" suppliers (for water stress risk) and chemicals producers (for untreated connected wastewater and unimproved sanitation risks). The basin-scale approach adopted by SUEZ ensures that risks are analysed in a geographic context, particularly in regions where the Group has critical current and future value chain activities.

These assessments are informed by stakeholder dialogue especially within basin organisations where SUEZ plays an active role (water agencies in France). SUEZ is also a founding member of the OECD Water Governance Initiative, a multi-stakeholder network of 100+ experts, policymakers and practitioners from public, private, and civil society sectors gathering twice a year in a Policy Forum. It is an international forum that provides a consultation mechanism and stakeholder platform to address water governance issues, where mutual learning and experience-sharing can take place and where useful water governance practices can be identified and scaled up. SUEZ refers to the 12 OECD principles for good water governance in its Human Rights and Health, Safety and Environmental Risk policies.

4.1.1. Policies regarding water resources (E3-1)

SUEZ addresses water-related challenges through impact assessment studies, stakeholder engagement, and innovation in resource management.

The downstream value chain of SUEZ primarily consists of local authorities, who are essentially the customers. Consequently, the water-related objectives of SUEZ differ from contract to contract, depending on the specific requirements of local authorities.

At a global level, SUEZ addresses the material impacts, risk and opportunities identified related to water through a set of policies that apply to its own operations as well as upstream and downstream value chains.

Sustainable Development Roadmap 2023-2027 – focus on water

In its *Sustainable Development Roadmap 2023-2027*, SUEZ commits to limiting impact on fresh water by systematically proposing water saving programmes to its clients and increasing water preservation (IRO-E3-1).

This also contributes to expanding its revenue through the most sustainable solutions (IRO-E3-2). Water saving measures are systematically implemented for water distribution activities in water-stressed areas (IRO-E3-3). For further detail on the *Sustainable Development Roadmap 2023-2027* please refer to ⩥ section *1.3.4. Sustainable Development Roadmap 2023-2027* of the present Sustainability Statement.

Human Rights Policy

SUEZ commits to map risks of water insecurity in water distribution contracts, particularly in vulnerable regions (IRO-E3-1). The policy emphasises risk assessments, solidarity mechanisms for underserved populations, and the protection of local environments through impact studies for construction projects (IRO-E3-3). It mentions crisis management plans, including temporary access solutions in the event of prolonged service interruption. The principles of this policy apply to subcontractors and suppliers, in accordance with ethics and sustainability clauses included in their contracts.

For further detail on the *Human Rights Policy*, please refer to ⩥ section *1.3.3. Cross-cutting material Group policies* of the present Sustainability Statement.

Health, Safety & Environmental Risks (HSE) Policy

It provides a framework to mitigate the Group's main environmental & industrial risks, among them water-stress (IRO-E3-1, IRO-E3-2) or water pollution (⩥ see ESRS E2). The policy refers to international standards, such as the OECD Principles on Water Governance. These principles have been endorsed by 170+ stakeholder groups or governments, including 38 OECD Member Countries, seven Non-Member Countries and 140 Stakeholder groups. The policy is presented in further detail in ⩥ section *1.3.3. Cross-cutting material Group policies*.

They apply to the overarching water policy cycle. They cut across water management functions (e.g. drinking water supply, sanitation, flood protection, water quality, water quantity, rainwater and stormwater), water uses (e.g. domestic, industry, agriculture, energy and environment) and ownership of water management, resources and assets (e.g. public, private, mixed) (IRO-E3-1, IRO-E3-2, IRO-E3-3).

Resource Use and Circular Economy Policy

This policy emphasises efficient use of water resources and alternative sourcing through reuse and recovery solutions with a focus on securing water resources quantitatively and qualitatively (IRO-E3-2). It highlights transforming wastewater treatment plants to optimise water use and prevent pollution, showcasing efforts to advance sustainable water sourcing (IRO-1). Further detail on the policy is presented in ⩥ section *1.3.3. Cross-cutting material Group policies*.

SUEZ Sustainable Purchasing Charter

The Charter has been implemented across SUEZ operations and supply chain, reinforcing commitments across climate, nature, and social dimensions. Aligned with its dedication to minimising freshwater impact, the policy prioritises suppliers who actively reduce their environmental footprint, addressing the risk of water stress by promoting more sustainable water consumption behaviours. Additionally, SUEZ prioritises suppliers that contribute to resource preservation through recycling and reuse initiatives in waste and water management (IRO-E3-1, IRO-E3-2).

For more detail on the *Sustainable Purchasing Charter*, please refer to ⩥ section *1.3.3. Cross-cutting material Group policies*.

4.1.2. Taking action on water resource challenges (E3-2)

SUEZ is dedicated to addressing global water resource challenges through innovative solutions, advanced technologies, and strategic partnerships. Recognising the increasing pressure on water resources and the critical need for sustainable management, the Group is focused on mitigating risks associated with water scarcity, pollution, and climate change. Its efforts prioritise both the conservation and regeneration of water ecosystems while promoting the efficient and equitable use of resources. By embedding circular economy principles and leveraging digital tools, SUEZ aims to enhance water distribution efficiency, enable water reuse, and protect aquatic biodiversity.

Below are examples of the most important actions and resources deployed in 2024, to achieve SUEZ policy objectives toward:

New business models to promote water preservation

Implement Performance Contracts (IRO-E3-1)/short and medium terms

The Bassin de Brive urban area, in partnership with SUEZ, aims to reduce water withdrawals by 21% as part of a seven-year public service delegation contract covering 37 municipalities for drinking water and 48 for sanitation. This goal is set in a sound economic and contractual model that links part of the service operator's revenue to the annual reduction in volume. SUEZ is deploying digital tools for the detection and repair of leaks and has set up a local control centre in Brive dedicated to the territory, which analyses network data to optimise operations and facilitate decision-making. All residents have been equipped with smart meters, enabling them to better manage their consumption. Awareness campaigns and digital tools also encourage citizens to take action and promote sustainable water use behaviour.

Reduce the use of water through efficiency measures

SUEZ helps its clients to improve water supply while reducing water losses and wastage. In 2024, key projects included:

Macao: one of the lowest non-revenue water rates in China (IRO-E3-2)/short term

In recent years, Macao Water, a SUEZ subsidiary, has maintained a 7% non-revenue water rate, consistently leading the world and outperforming China's target to be below a 9% non-revenue water rate by 2025. Macao Water has been recognised as the most successful PPP model in Asia and a benchmark for China's water industry for its operational and service excellence.

Water Supply in New Delhi (IRO-E3-2, IRO-E3-3)/short term

Through a public-private partnership, SUEZ has significantly improved water supply in New Delhi's Malviya Nagar district. The project ensures 24/7 water availability for 400,000 residents, increases network efficiency from 33% to 61%, and modernises customer service. SUEZ replaced 100 km of pipelines, connected 15,000 new users, and implemented advanced leak detection technology.

Community Partnerships in Kolkata (IRO-E3-2, IRO-E3-3)/short term

In the Cossipore district of Kolkata, India, SUEZ is engaged in a programme to drastically reduce water losses and improve the quality of service for 420,000 residents. It involves upgrading the network, optimising pressure, detecting, and repairing leaks, using analysis tools based on artificial intelligence and developing innovative collaborations with local communities. As part of the programme, SUEZ is working with local women's self-help group Jal Bandhus to raise awareness about water preservation, as well as training women in plumbing, enabling them to diversify their income. Water losses reduced from 56% to 13%.

Modernisation in Tashkent (IRO-E3-2, IRO-E3-3)/short term and medium term

SUEZ has partnered with Uzbek authorities, to launch the Tashkent Water Transformation Plan (TWTP) to modernise water and sanitation networks. This 7-year, €142 million project aims to reduce water losses by 12%, improve water quality, and ensure 24/7 water access for 3 million residents. SUEZ installed 650,000 smart meters, and enhanced customer service through a new mobile app.

SUEZ develops digital water management to help customers with reducing their consumption:

Le Mans/short term

SUEZ has implemented the ON'connect™ metering technology across 120,000 water meters in the Le Mans area to optimise water management and service delivery. The smart metering and AQUADVANCED® hypervision solution have led to significant water savings, more accurate billing, and improved customer satisfaction. These solutions also help improve energy performance by reducing consumption of domestic hot water – since 50% of the water used by customers is heated before use – which can save a household up to €200 per year.

Mulhouse/short term

SUEZ has equipped 22,000 water meters in Mulhouse with ON'connect™ metering technology to enhance water management and customer service. The initiative of SUEZ includes real-time data collection, leak detection, and improved billing processes, benefiting 195,000 residents. This project supports Mulhouse's digital transformation by reducing operational costs and improving service efficiency. The ON'connect™ range of solutions allows customers to save up to 16% through reductions in users' consumption, the detection of leaks on the premises of consumers and businesses, and improvements in network performance

Valenciennes/short term

In collaboration with the Syndicat des Eaux du Valenciennois, SUEZ has launched the "Coach Cons'eau" app to help 67,000 households manage their water consumption. This app provides real-time consumption data, personalised tips, and alerts to promote eco-friendly behaviours and water conservation. This initiative complements the existing connected water meters and home mediation services, aiming to reduce water usage and preserve local water resources.

Reclaim and reuse water

Maximising Treated Wastewater Reuse (IRO-E3-1, IRO-E3-2, IRO-E3-3)/short term

SUEZ has implemented water recycling projects which enable the reuse of treated wastewater to preserve natural water resources and ensure the sustainability of water-dependent activities, particularly during periods of water scarcity. These projects substitute treated wastewater for potable water in applications such as agricultural irrigation, green space watering, industrial processes, and aquifer recharge, reducing pressure on conventional water supplies. Advanced technologies, including sand filtration, reverse osmosis, and ultraviolet disinfection, are employed to ensure safety and adapt water quality to specific uses, with complementary technologies used for applications requiring drinking-water standards. Below are the most important examples:

SUEZ has partnered with the National Office of Sanitation of Tunisia (ONAS) in the country's first private-sector wastewater management agreement, addressing water scarcity in a high-water-stress region. This 10-year partnership focuses on the operation and maintenance of 14 wastewater treatment plants with a combined capacity of 39 million cubic meters per year, serving approximately 960,000 residents. The partnership improves wastewater treatment efficiency to reclaim water for agricultural reuse, reducing the demand on freshwater resources, and protecting aquatic ecosystems from pollution. Future plans under this partnership include upgrading plant infrastructure and integrating innovative treatment solutions to further enhance water quality and reuse capabilities. The initiative supports Tunisia's national objectives for sustainable water management while contributing to economic and environmental resilience.

In China, the Shanghai Chemical Industry Park (SCIP) is the first professional petroleum and fine chemical industrial park established since the reform and opening. Serving as the hub of six southern industrial zones in Shanghai, SCIP hosts renowned chemical companies such as Sinopec, Covestro, BASF, Evonik, Huntsman, Mitsubishi, and Mitsui Chemicals. Within this ecosystem, SUEZ provides high-quality industrial water and advanced treatment solutions for high-concentration industrial effluents. Additionally, SUEZ enhances water sustainability by creatively reusing treated wastewater to produce demineralized water through tertiary treatment and membrane technology, saving 2,000,000 m^3 of water resources annually.

In France, SUEZ allows watering the Cap d'Agde golf course with treated wastewater (REUSE), saving 200,000 m^3 of drinking water during the summer. Nantes Métropole and SUEZ have also been experimenting with the REUT skid since August 2024 at the Tougas wastewater treatment plant in Saint-Herblain. The installation makes it possible to carry out additional treatment of water leaving the treatment plant and to "recover it". Of the 105,000 m^3 of water treated and discharged into the natural environment every day, 240 m^3 are recovered to be reprocessed in the "REUT skid" module. In this easily movable blue container, the wastewater passes through a sand filter, under UV rays and then receives chlorine. This 240 m^3 (i.e. about the water consumption for six years of a person living in the metropolis) is then used on the plant for cleaning, watering and process water.

Recharging groundwater (IRO-E3-2)/short term

SUEZ positive impact on reducing the pressure on water resources goes through innovative solutions such as groundwater recharge. A recent example of this is the deployment of Aquifer Storage and Recovery (ASR) technology where water is injected into the groundwater and the water stock so that it can be recovered from a single facility. This technology offers the advantages of a smaller land footprint and low maintenance, since water flows in and out of the borehole, reducing clogging.

In Adelaide, Australia treated wastewater from the Bolivar treatment plant is stored in an aquifer during times of lower recycled water demand, allowing increased availability of recycled water for irrigation during drier periods. The recovered water supports agricultural irrigation in the region, reducing reliance on groundwater and surface water resources. This scalable and sustainable approach to water resource management directly addresses climate resilience.

SUEZ is committed to protecting marine ecosystems while delivering sustainable water solutions. Desalination plants use advanced numerical modelling to design brine dispersion methods that minimise environmental impact. In Perth, for example, the Group installed an offshore pipeline with multiple diffusers along the final 200 metres to ensure the even distribution of brine. This system is monitored in line with regulatory requirements to safeguard marine life and habitat health.

Desalinate brackish and seawater (IRO-E3-2)/short term

To meet the growing demand for drinking water, SUEZ is constructing desalination plants that leverage advanced technologies to convert salt or brackish water into potable water. This approach diversifies water sources, reduces dependence on freshwater resources, and addresses risks of shortages caused by climate change and overexploitation. With global experience in desalination present in various high-water stress regions such as Egypt, Australia, China, Elba, SUEZ is expanding developments further. Here are most impactful examples:

The Victoria Desalination Plant (VDP) addresses water stress in Australia by providing up to 150 million m^3 of drinking water annually, supporting over 4 million residents in Melbourne and nearby areas. Operated by SUEZ, it uses reverse osmosis technology to desalinate seawater, reducing reliance on overexploited freshwater sources. The plant operates with 100% renewable energy, minimising environmental impact, and includes marine ecosystem protections like a carefully designed inlet and outlet system. Future plans focus on advancing brine management and maintaining carbon-neutral operations, aligning with objectives to enhance water efficiency and protect ecosystems.

In 2024, SUEZ completed the construction of the first seawater desalination plant in Jaffna, Sri Lanka, addressing chronic water scarcity affecting nearly 300,000 residents. With a production capacity of 24,000 m^3 of drinking water per day, the plant uses reverse osmosis technology to convert seawater into potable water, reducing reliance on overexploited groundwater sources. It also integrates measures to protect the surrounding marine ecosystem, such as minimizing brine discharge impacts. This initiative strengthens long-term water security in Jaffna, aligns with Sri Lanka's national water management strategy, and promotes environmental sustainability.

Provide services in all contexts

Compact water treatment plants UCDs (IRO-E3-1, IRO-E3-3)/short term

Decentralised Compact Units (UCDs®) are compact, modular, and decentralised water treatment plants that can be deployed much more quickly than a traditional drinking water production plant, providing access to water to meet urgent needs. The solution addresses global problems such as rapid expansion of urban and peri-urban centres, often isolated. It allows securing drinking water supply or wastewater treatment for hospitals, living or military bases. SUEZ offers different packages, depending on local needs. Smart Village Initiative is a comprehensive solution combining water, energy, and sanitation services to promote socio-economic development in rural and peri-urban areas. Energy self-sufficiency via solar power, biogas production from organic waste, and integration of additional socio-economic services like remote education and medicine. UCD® solutions are implemented globally, with notable projects in regions such as Africa, Southeast Asia, and the Pacific Islands. The stakeholders such as local authorities, rural communities, industrial clients, and international donors participate actively in the design, funding, and implementation phases.

Further details on policies and actions to improve access to water and sanitation services can be found in sections on *Affected communities* and *Consumers and end-users*.

4.2. Metrics & targets

4.2.1. Targets regarding water resources (E3-3)

		Target	Baseline		Results	
Target	Metric	(2027)	Year	Value	2024	Policy
Limit the impact on fresh water (IRO-E3-1, IRO-E3.2)	Percentage of commercial proposals concerning water production and distribution with a commitment to preserving water resources	100%	2023	71% (France)	50% (Group)	SD Roadmap
Implement a water savings programme for 100% of our water distribution contracts in water stress areas (IRO-E3-3)	Percentage of distribution contracts in water-stressed areas with a commitment to preserving water resources	100%	2023	100% (France)	80% (Group)	SD Roadmap
Grow in international markets	Percentage of turnover generated outside France (waste & water)	40%	2023	40.7%	40.5%	Strategy

More information on the methodology for the establishment of targets related to the *SD Roadmap* can be found in ⩥ section *1.3.4 Sustainable Development Roadmap 2023-2027*. The target on growth in international markets was established in 2022, as part of the "new SUEZ" strategy, aligning with the Group's core business focus and capacity to scale innovative solutions in key markets. The target aims to increase international revenue to 40% by 2027. It was defined as a result of the Strategy Review, validated by the Executive Committee and Board of Directors, taking into account industry trends, business outlook, and internal capabilities. Performance against this target is monitored through periodic reviews. Any significant deviations or trends are analysed and addressed to ensure alignment with the Group's long-term objectives.

As a service provider to local authorities, who form the core of the downstream value chain, SUEZ operates within a framework where every contract is tailored to the diverse needs, priorities, and contexts of each region. Typically, the water network yield is at the heart of drinking water distribution contracts, reflecting the specific performance of local water systems. But the global average of this indicator tells little about the actual performance of SUEZ over time.

Meanwhile, SUEZ remains steadfast in its commitment to sustainability by systematically proposing water efficiency measures and innovative solutions to its customers. These measures are designed to enhance resource efficiency and are integrated into contracts wherever possible, aligning local needs with global sustainability goals. Two targets in the *Sustainable Development Roadmap 2023-2027* are designed to address the risk of water stress and the changes it carries in water consumption behaviours (IRO-E3-1). Limiting the impact of SUEZ on fresh water is measured by the percentage of commercial proposals concerning water production and distribution with a commitment to preserving water resources.

SUEZ will also implement a water savings programme for 100% of its water distribution contracts in water stress areas, as documented in Aqueduct (water-stress risk filter).

These two targets also support SUEZ actual positive impact, as they reduce the pressure on water resource (IRO-E3-2), and allow the Group to seize opportunities to deploy its solutions where they are most needed (IRO-E3-3). As part of its strategy, SUEZ aims to reach 40% of turnover in international markets by 2027: this target also reflects those opportunities (IRO-E3-3). The objective to deliver innovative solutions is closely monitored internally as part of the business performance monitoring.

4.2.2. Water withdrawal, discharges and consumption (E3-4)

SUEZ actively measures the effectiveness of its policies and actions on water-related impacts, risks, and opportunities using quantitative metrics. This approach reflects the ambition to innovate, develop the offerings, and propose solutions that reduce pressure on water resources while delivering water in areas with insufficient or no supply. Progress is continuously evaluated using quantitative indicators:

		Results	
SUEZ own Water Metrics	Units	2023	2024
Technical efficiency of drinking water distribution networks	%	84%	79%
Drinking water production through desalination plants	Mm^3	46.7	46.3

Flowmeters are used to accurately monitor and control the fluid flowing in a pipe, hose or in the open air in a conduit or open channel. They are installed in line with the pipe carrying water they measure; they can be mechanical or electrical.

Water metrics are measured using either precise meters or flow meters and are reported annually by business units to the Performance Direction through the Group's environmental reporting system for consolidation.

Water withdrawals

Withdrawals include all water entering SUEZ boundaries, encompassing:

- raw or drinkable water that SUEZ withdraws, receives, or purchases for production purposes;
- water entering drinking SUEZ-operated water distribution networks;
- wastewater entering SUEZ-operated collection networks and wastewater treatment plants;
- rainwater captured through leachates or storm basins.

Metrics	Unit	2024
Water withdrawals	Mm^3	5,841
% of water withdrawn in regions under water stress	%	39%

Water discharges

Discharges include all water leaving SUEZ boundaries, encompassing:

- water, whether used or unused, that is transferred to a third party (whether sold or not);
- water released through a designated discharge point (point source discharge);
- water dispersed over land in an undefined manner (non-point source discharge), including leaks from drinking water and wastewater networks.

Metrics	Unit	2024
Water Discharges	Mm^3	5,837

Water consumption

Water consumption is the result of the difference between water entries and discharges. They are calculated using a simple formula:

Water Consumption = Water Intakes – Water Discharges

A positive consumption value indicates that a portion of the water does not leave SUEZ boundaries in liquid form because it has either been lost (e.g., through evaporation or chemical transformation) or incorporated into a product.

Some of SUEZ core business activities are considered to have zero consumption, as SUEZ only facilitates water transfers without destroying or incorporating water into a product. Indeed, for these activities all water entering SUEZ facilities is ultimately returned in liquid form, either to a client or the environment.

Activities with **no water consumption** are:

- Drinking Water Production Activities: All water entering the operational boundaries of SUEZ, i.e., water abstracted delivered or purchased, is accounted for and subsequently exits either as sales to clients or by entering the distribution network of SUEZ. As a drinking water provider, SUEZ does not consume water as per the CSRD definition. In the water production process, leaks and evaporation are negligible. There is no unaccounted-for water consumption within the system. The process involves own operations, upstream and downstream value chain;
- Drinking Water Distribution Activities: All water entering the SUEZ supply system is fully accounted for, exiting either as consumption by final users or through leaks classified as discharges (as this water returns to the environment). There is no unaccounted-for water consumption within the system, ensuring transparency and effective resource management across the value chain, including own operations, upstream suppliers, and downstream users;
- Wastewater Collection Activities: All wastewater entering SUEZ collection system, i.e. municipal or industrial wastewater and rainwater, is fully accounted for and exits either by reaching a wastewater treatment plant or through leaks and potential network overflows, both classified as discharges (as this water returns to the environment). There is no unaccounted-for water consumption within the system;
- Wastewater Treatment Activities: All wastewater entering SUEZ operational boundaries is fully accounted for and exits either as defined discharges points or as water reused by the client. As a wastewater treatment operator, SUEZ does not consume water according to the CSRD definition.

The activities with **a positive water consumption** are:

- all waste activities: Waste treatment activities produce significant water consumption (i.e. positive difference between the water volume entering and discharged the by the facility). Within SUEZ businesses are in mainly incinerators and other waste treatment facilities. Indeed, cooling incinerators' fumes takes significant water volumes;
- other SUEZ needs: SUEZ own water consumption refers to the water retained for internal use and not discharged. This includes water used for office operations and industrial processes. The analysis covers all SUEZ operations, including office facilities and industrial activities such as water storage, cleaning, and chemical dilution.

DETAILED TABLE OF WATER CONSUMPTION FOR SUEZ PER ACTIVITIES AND USAGE (IN MM³)

	For Water business purposes (water sold or treated for the client)			For SUEZ own processes (chemical dilution, leachates, storm bassins...) and offices			Total		
	Total withdrawn	Total discharged	Total consumed	Total withdrawn	Total discharged	Total consumed	Total withdrawn	Total discharged	Total consumed
Water Business – Drinking water production and distribution	3,621	3,621	0	1.5	1.5	0.02	3,622	3,622	0.02
Water Business Waste water collection and treatment	2,100	2,100	0	2,9	2,8	0,02	2,103	2,103	0.02
Waste Business	N/A	N/A	N/A	115.5	111.5	3.95	115.5	111.5	3.95
TOTAL	**5,721**	**5,721**	**0**	**119.9**	**115.9**	**3.99**	**5,841**	**5,837**	**3.99**

In 2024, SUEZ water consumption was 3,992,503 m³.

Water consumptions in areas of water risks

For SUEZ, sites under water risks are the ones tagged "High" or "Extremely High" to the "Global Risk indicator" in WRI Acqueduct Tool which is calculated thanks to a weighting of the following risks:

Type of risk	Risk name
PHYSICAL RISK: QUANTITY	Water Stress
	Water Depletion
	Interannual variability
	Seasonal Variability
	Ground water table decline
	Riverine Flood Risk
	Coastal flood risk
	Drought Risk
PHYSICAL RISK: QUALITY	Untreated connected Wastewater
	Coastal Eutrophication Potential
PHYSICAL RISK: REGULATORY AND REPUTATIONNAL	Unimproved/No drinking water
	Unimproved/No sanitation
	Peak ReRisk Country ESG Index

To identify sites under water risk, a survey was conducted across more than 1,200 SUEZ facilities, focusing on those with significant treatment capacity (representing 55% of total withdrawals and 55% of discharges). This approach helps avoid reporting on sites that are instrumental to the system but not "primary" in withdrawing or discharging water. A total of 139 sites were identified in a water risk area, primarily located in Australia, India, southern France, Italy, and Morocco

In 2024, a total 47,100 m³ of water was consumed in areas at water risk (1% of total water consumption).

Water consumption in areas of high-water stress

For SUEZ, sites under water high-water stress are the ones tagged "High" or "Extremely High" under the "Water Stress indicator" in WRI Acqueduct Tool which is calculated thanks to a ponderation of those following risks:

Among the surveyed sites – which are the same as those assessed for water risks – 336 were identified as operating in water-stressed area. They are also located in the same geographies reported in the water risk section. This identification for sites located in water stress areas is based on the baseline water stress (BWS) metric from the Aqueduct Water Risk Atlas, which categorises watersheds by stress level: 1 (low water stress) to 5 (extremely high-water stress, with BWS > 80%). Sites in water-stressed areas received a label of "High" (4) or "Extremely High" (5).

In 2024, a total 208,000 m^3 of water was consumed in areas of high-water stress (5% of total water consumption)

Water intensity ratio

SUEZ does not consider that the water intensity ratio being total water consumption in its own operations in m^3 per million EUR net revenue is material as each plant is designed differently and often not by SUEZ and therefore an average water intensity ratio would not be a representative information.

Water stored

The water storage managed by SUEZ is primarily designed to address emergency situations and ensure service continuity during crises, such as droughts or infrastructure disruptions Under this metrics fall also leachates, storm and wastewater stored before treatment Water prepared for reuse.

Metrics	Unit	2024
Water storage	Mm^3	6.94

Water Yield of Distribution networks

The technical efficiency of drinking water distribution networks is the key indicator measuring performance of water distribution activities. It is at the heart of commercial contracts and associated with penalties when targets are not reached. It is disclosed for each water distribution contract as part of reporting duties to clients. SUEZ also consolidates this indicator at group level:

Metrics	Unit	2024
Technical efficiency of drinking water distribution networks	%	79%

Water reused

The SUEZ REUSE metric applies to its clients, not the entity itself. Volumes of recycled/reused water are monitored using either precise meters or flow meters at wastewater treatment facilities where reclaim systems are installed. Such volumes are then reported annually by business units to the Performance Direction through the Group environmental reporting system for consolidation.

		Results	
Metric	Unit	2023	2024
Water prepared and reused BY SUEZ	Mm^3	0	0
Water prepared for reuse for SUEZ Clients	Mm^3	72.4	78.2

In 2024, a total of 78.2 Mm^3 of water was prepared for reuse, mainly in Australia, Egypt, and France (which corresponds to 3.1% of total water treated).

4.2.3. Metrics methodology regarding water resources

Reporting perimeter coverage

The CSRD regulation aims to align financial and non-financial reporting scopes. To meet this requirement, every financial entity consolidated in the group's financial results must collect relevant non-financial data if deemed material. A site is considered material if its activities significantly impact the company's sustainability performance and revenue or if it is exposed to sustainability-related risks and opportunities.

This rule applies regardless of how long the entity operated during the reporting year. In previous sustainability reporting under the NFPS (Non-Financial Performance Statement), data integration was only required if the entity had been under SUEZ operational control for at least six months.

For this sustainability statement, all financial entities within SUEZ Business Units and Business Partners (such as support services, innovation, etc.) were assigned a dedicated environmental reporting entity or were included within a broader reporting structure. No entities were excluded based on scope parameters (financial consolidation, size, geography, activity, ...).

Metrics accounting rules

For ESRS E3, the accounting follows the Financial Control approach. This means:

- if an entity is fully financially consolidated, 100% of its metrics are included in SUEZ inventory;
- if an entity is part of a joint operation, only a proportion of the metrics is included, based on SUEZ share in the operation;
- if an entity is a joint venture or an associate, its metrics are not included in SUEZ inventory.

Based on its understanding of the available guidance, SUEZ elected to include third-party assets associated with contracts or sites it does not own as long as they are part of a consolidated entity. This includes third-party assets under:

- operation and maintenance (O&M) contracts;
- concession contracts, where SUEZ operates the asset but does not own it.

Definitions and data used

Water intakes & discharges measurements:

Since they represent key metrics of SUEZ core water activities, the total volumes of water intakes and discharges related to SUEZ water businesses are measured daily at sites using precise flow meters. These volumes are then reported annually by business units to the Performance Direction through the Group's environmental reporting system for consolidation.

For other waste-related activities or SUEZ own water consumption (e.g., offices, vehicle cleaning), volumes can be determined either through direct measurements or obtained from suppliers through invoices.

Water intakes per sources and discharges by destination are monitored and reported at corporate level:

- types of water intake sources include: water withdrawn by SUEZ for production or operational processes, water purchased or supplied by a third party, wastewater entering SUEZ-operated collection networks and wastewater treatment plants, and all other water entering SUEZ boundaries (such as water collected in storm basins and rainwater falling on landfills, which will ultimately generate leachate);
- types of discharge destinations include: drinking water leaving SUEZ facilities for distribution through client networks or directly by SUEZ, wastewater discharged after treatment or prepared for reuse, water used in SUEZ processes and sent to third-party treatment, and leachate that is either treated and discharged or sent for external treatment.

Materiality threshold for water resources

SUEZ water activities in France are characterized by the operation of numerous small sites with limited activity capacities.

To differentiate sites with a significant impact water resources from those with negligible impact due to their small activity scale, a materiality threshold was established:

- for wastewater treatment plants: 10,000 inhabitant equivalents (262 sites exceed this threshold, while 1,399 are below for 2024);
- for water production sites: 7,000 m^3 per day (115 sites exceed this threshold, while 429 are below for 2024).

For the first year of CSRD reporting, these thresholds were adjusted for simplification purposes, with a primary focus on the most significant sites. However, the standard thresholds will be fully applied in the coming years. The temporary thresholds used for this first reporting year are:

- for wastewater treatment plants: 100,000 inhabitant equivalents (34 sites exceed this threshold, while 1,627 are below for 2024);
- for water production sites: 100,000 m^3 per day (12 sites exceed this threshold, while 532 are below for 2024).

All international wastewater treatment plants and drinking water production plants were included in the reporting.

BIODIVERSITY AND ECOSYSTEMS (E4)

BIODIVERSITY AND ECOSYSTEMS

Subtopic	Code	IRO	Type	SD Roadmap 2023-2027 Commitments
SUEZ, AN ESSENTIAL SOLUTIONS PROVIDER				
Direct impact drivers of biodiversity loss & Impacts on the state of species	IRO-E4-2	Through its key activities in waste management and wastewater treatment, SUEZ contributes to the protection of the environment and ecosystems (reduction in the extraction of raw materials/protection of biodiversity).	I+	Roll out Nature action plans at all priority sites managed by SUEZ (= sensitive areas and/or > 10 Ha)
Impacts and dependencies on ecosystem services	IRO-E4-3	SUEZ is dependent on ecosystem services to help minimise residual pollution from its discharges. In addition, the key businesses of SUEZ (water and waste) reduce the pressure on ecosystem services caused by pollution.	I+	Prevent the development: a) of microplastics b) of micropollutants in natural environments Reach zero phytosanitary products used on sites managed by SUEZ
SUEZ, AN OPERATOR OF INDUSTRIAL EXCELLENCE				
Direct impact drivers of biodiversity loss & Impacts on the state of species	IRO-E4-1	Climate change is one of the 5 pressures identified by the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) as a contributor to the loss of biodiversity. SUEZ GHG emissions (ESRS E1) contribute to climate change.	I-	Contribute to reduce the land artificialisation pace Contain invasive non-native species Drastically reduce light pollution of installations

I+ Positive Impact I- Negative Impact R Risk O Opportunity

MATERIAL POLICIES

- Sustainable Development Roadmap 2023-2027
- Nature Standard for Sites Policy
- Nature Standard for Construction Sites Policy
- Sustainable Purchasing Charter

ACTIONS ON MATERIAL IMPACTS

- Introduction of *Nature Standard for Construction Sites* and *Nature Standard for Sites in 2024*
- Elimination of phytosanitary products
- Fight against micropollutants in natural environments
- Deployment of action plans on material sites
- Reduction of soil artificialisation rates
- Combatting the spread of invasive species

5.1. Strategy

5.1.1. Consideration of biodiversity and ecosystems in strategy and business model (E4-1)

Strategy

According to the World Economic Forum, nearly two-thirds of the global population depends on sanitation systems that expose them to waterborne diseases. Modern water and sanitation services require the reliable provision of safe drinking water and modern toilet and plumbing facilities for residential, commercial, and industrial buildings. Without these services, water networks risk contamination, leading to substantial environmental and public health costs. Furthermore, the United Nations Environment Programme (UNEP) projects that global waste production will double by 2050, with over 70% of waste currently ending up in landfills or being openly dumped. Ineffective waste management not only results in severe environmental damage – such as soil contamination, water pollution, and biodiversity loss – but also poses significant health risks in urban areas, where waste accumulation contributes to the proliferation of disease vectors and deteriorates air quality.

As a key operator in the water and waste sectors, SUEZ recognises that access to clean water and other essential services is fundamentally linked to the health and resilience of natural ecosystems. Ecosystem services – the benefits nature provides, such as water purification, biodiversity support, and resource balance – are vital to economic activities. This interdependence reinforces SUEZ commitment to preserving and restoring natural resources as a core element of its mission. Aligned with applicable regulations, SUEZ actively minimises its impact on biodiversity and compensates for unavoidable effects. Its water and waste management operations contribute directly to nature conservation by:

- **Mitigating Pollution:** treating 3.0 billion m^3 of wastewater in 2024 through its entire value chain to address water and land pollution (2.5 billion according to CSRD accounting rules).
- **Protecting Water Resources:** implementing wastewater reuse and leakage control solutions.
- **Reducing Resource Depletion:** producing 2.51 million tons of secondary raw materials from waste in 2024 across its entire value chain (2.46 according to CSRD accounting rules).
- **Enhancing Soil Health:** generating 603,000 tons of standardise compost in 2024 to enrich agricultural soils (same order of magnitude according to CSRD accounting rules).

These efforts underscore SUEZ role in integrating ecosystem health with sustainable business practices.

Business model

Preserving biodiversity is a core priority for SUEZ. The Company actively manages the ecological impact of its operations to ensure that its activities not only minimise harm but also contribute to the restoration of natural ecosystems. This commitment is evident in facilities that transform waste into resources – such as compost and biogas – which reduce reliance on virgin materials and protect habitats from overexploitation. Key operational sites include:

- **Waste Treatment and Resource Recovery** (values under CSRD accounting rules):
  - 58 composting facilities (57),
  - 2 organic depackaging sites (2),
  - 7 mechanical biological treatment sites (7),
  - 7 anaerobic digestion plants (7),
  - 479 material sorting, recovery, and transfer stations (472);

- **Landfill and Hazardous Waste Management:**
  - 75 open landfills (handling both non-hazardous and hazardous waste) (75),
  - 205 closed landfills (204),
  - 5 hazardous waste treatment sites for alternative fuels (5),
  - 1 solvent recovery facility (1),
  - no active hazardous waste sites for soil treatment.

In the water sector, SUEZ processes billions of cubic meters of water annually, ensuring a safe water supply and effective sanitation while minimising pollution. The company operates around 900 drinking water treatment plants (860 under CSRD accounting rules), and its wastewater management network includes more than 2,200 treatment plants worldwide (2,160 under CSRD accounting rules). For further details on SUEZ business model and value chain, please refer to the ⩥ section *1.4.2 Material impacts, risks and opportunities and their interaction with strategy and business model*.

SUEZ strategy and business model recognise the critical role of biodiversity and ecosystems in ensuring global sustainability and enhancing the resilience of its operations. Although the Group's activities exert minimal direct adverse impacts on biodiversity, SUEZ actively capitalises on opportunities to contribute to the objectives set out in the Kunming-Montreal Global Biodiversity Framework. The Group's approach prioritises measures that exceed regulatory requirements by mitigating the impacts of climate change and reducing pollution. In addition, SUEZ addresses other key drivers of biodiversity loss, as identified in the 2019 Intergovernmental Platform on Biodiversity and Ecosystem Services (IPBES) report, including invasive alien species, changes in land and sea use, and the direct exploitation of species.

SUEZ aligns with Target 6 of the Global Biodiversity Framework, which calls for the elimination, minimisation, reduction, and mitigation of the impacts of invasive alien species on biodiversity and ecosystem services. In pursuit of this objective, the Group proactively addresses invasive alien species by deploying a range of solutions and tools aimed at their eradication on sites operated or owned by SUEZ. For example, specific guidance and explanatory signage have been introduced in France to facilitate the extraction and destruction of invasive alien species. To further contain invasive alien species, SUEZ is committed to ensuring that 100 per cent of sites undergoing renaturation and landscaping operations utilise only local species by 2027.

SUEZ aligns with Target 7 of the Global Biodiversity Framework, which seeks to reduce pollution risks and negative impacts from all sources by 2030 to levels that are not harmful to biodiversity or ecosystem functions and services. This target encompasses reducing excess nutrients lost to the environment by at least 50 per cent through more efficient nutrient cycling and use, halving the overall risk from pesticides and highly hazardous chemicals via integrated pest management, and preventing, reducing, and ultimately eliminating plastic pollution. Through the "zero-phyto" programme, SUEZ eliminates chemical pesticides and fertilisers by replacing them with biocontrol methods and organic fertilisers, while also implementing advanced nature-based solutions such as Zones Libellule (Dragonfly Zones) to mitigate residual pollution from industrial treatment processes. In addition, SUEZ integrates micropollutant removal technologies within its wastewater treatment plants to safeguard aquatic ecosystems from chemical pollutants.

SUEZ supports Target 8 of the Global Biodiversity Framework, which aims to minimise the impact of climate change and ocean acidification on biodiversity and enhance resilience through mitigation, adaptation, and disaster risk reduction measures, including nature-based and ecosystem-based approaches. The Group is advancing carbon neutrality through the modernisation of assets and increased utilisation of sustainable electricity. In addition, the production of renewable energy from waste contributes to a reduced reliance on fossil fuels. SUEZ also delivers several solutions aligned with this target, such as Sea(l) advanced, Cystore, Refish, and initiatives in mangrove restoration.

SUEZ aligns with Target 11 of the Global Biodiversity Framework, which calls for restoring, maintaining, and enhancing nature's contributions to people by safeguarding ecosystem functions and services – such as air, water, and climate regulation, soil health, pollination, and the reduction of disease risk – while protecting communities from natural hazards and disasters through nature-based and ecosystem-based approaches. To support this target, SUEZ promotes water efficiency through comprehensive programmes that reduce water consumption and regulate freshwater resources, thereby preserving critical ecosystem services. In addition, tailored water savings initiatives contribute to enhanced ecosystem resilience and disaster risk reduction. Furthermore, SUEZ has developed an innovative solution to extract phosphorus from wastewater via struvite recovery, converting it into a valuable fertiliser.

In support of Target 14 of the Global Biodiversity Framework – which calls for the full integration of biodiversity and its multiple values into policies, regulations, planning and development processes across all levels of government and sectors – SUEZ embeds biodiversity considerations within its core policy framework, the "Sustainable Development Ambitions and Commitments 2023-2027". The Group is committed to deploying Nature Action Plans at material sites and incorporating biodiversity preservation measures into commercial proposals. Further measures include addressing microplastics and micropollutants in wastewater treatment and prioritising native species in renaturation projects. In doing so, SUEZ aligns its operations with biodiversity goals and ensures that both public and private sector activities, as well as fiscal and financial flows, progressively reflect the principles outlined in the framework.

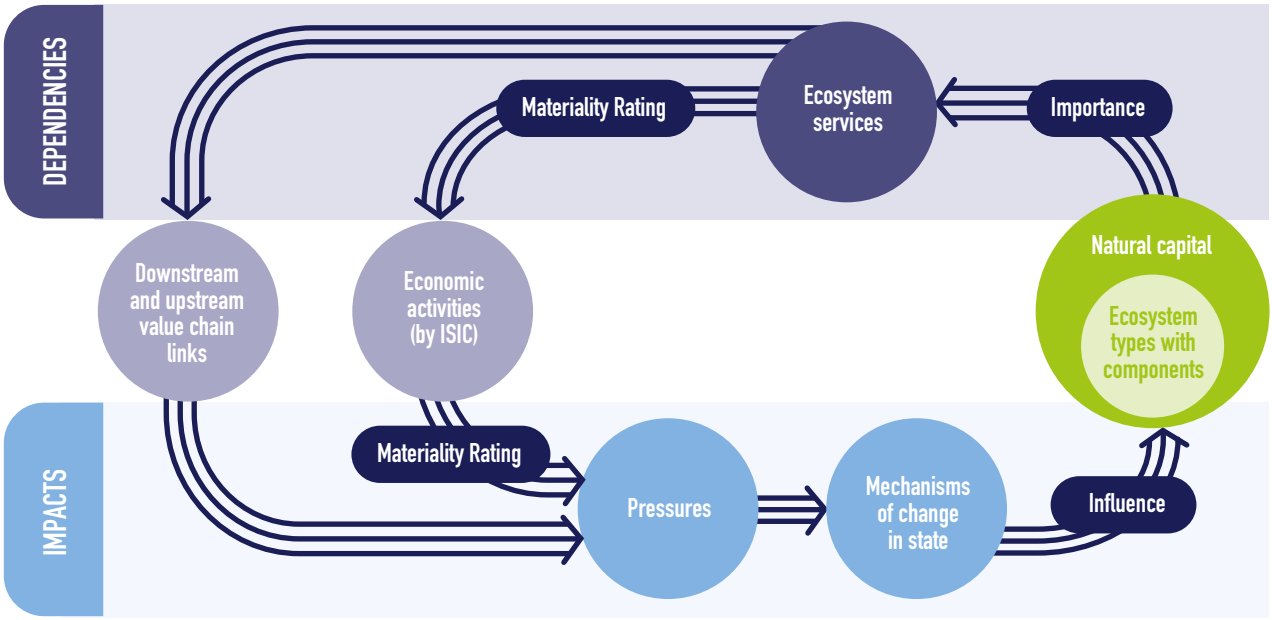
While no standalone biodiversity transition plan is currently required, the ongoing activities of SUEZ demonstrate significant alignment with biodiversity and ecosystem goals.

Dependencies and impacts

As part of the assessment of the resilience of the business model and strategy of SUEZ in relation to biodiversity – encompassing physical, transition, and systemic risks – an evaluation has been conducted to analyse the dependencies of activities on ecosystem services and assess biodiversity impacts using the "Exploring Natural Capital Opportunities, Risks and Exposure" (ENCORE) methodology.

The ENCORE knowledge base provides the foundation for this analysis, structured around two interrelated pathways: one focused on dependencies and the other on impacts. This methodology examines economic activities' reliance on ecosystem services, drawing on scientific literature and expert evaluations. The assessment identifies dependencies on 25 ecosystem services across 271 economic activities, highlighting the essential natural inputs required for production processes. A similar approach has been applied to assess biodiversity impacts. Literature reviews were conducted for each identified pressure linked to specific economic activities, with expert validation from representatives of various industry sectors. This comprehensive evaluation enables SUEZ to better understand the interconnections between business operations and biodiversity, supporting the integration of nature-related considerations into strategic decision-making.

The structure of the knowledge base iteration is summarised in the following figure.



Source: Explanatory note on the updated ENCORE knowledge base outlining business dependencies and impacts on nature, June 2024.

The ENCORE methodology evaluates the dependency of business sectors on ecosystem services without incorporating scenarios or time horizons for business activities, and no specific stakeholder engagement is included in the assessment. The methodology focuses solely on direct impacts and dependencies, making the analysis particularly relevant at the site level.

SUEZ has established a structured and well-founded process to identify and assess material impacts, risks, dependencies, and opportunities related to biodiversity and ecosystems. This step-by-step methodology involves categorising dependencies and impacts, conducting targeted evaluations at material sites, and applying criteria based on predefined impact thresholds.

To effectively analyse dependencies, a comprehensive assessment of the ecosystem services upon which SUEZ activities rely is required. This approach ensures a detailed understanding of how business operations interact with natural systems, supporting the integration of biodiversity considerations into strategic planning and risk management.

The following table lists ecosystem services according to the CICES classification. These ecosystem services are considered in the ENCORE methodology.

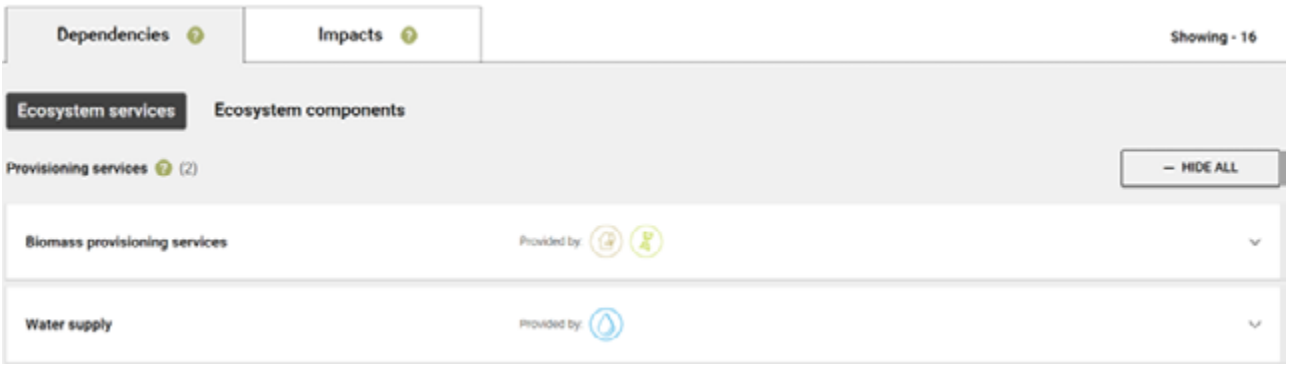
Provisioning	Regulation	Cultural
Fresh Water	Pollination	Recreation and community activities (tourism, outdoor activities and sports, hunting, fishing)
Food product	Climate regulation	Education
Raw materals (wood, fibers)	Air quality regulation	Aesthetic value
Biomass fuel	Water regulation	Heritage value
Medicinal resources	Regulation of erosion	Traditional, spiritual or religious value
Genetic resources	Regulation of disease and pests	
	Regulation of natural disasters	

Source: The proposal for a Common International Classification of Ecosystem Services (CICES).

According to the above table and the ENCORE tool, SUEZ activities are dependent on water supply services, specifically the availability of freshwater. Water supply services represent the combined contributions of ecosystems, including water flow regulation, water purification, and other related functions, to provide water of appropriate quality for various uses, including household consumption. SUEZ operations are directly linked to these services. In particular, drinking water production activities depend on both the quality and quantity of available water resources. Water collection, treatment, and supply activities rely on ecosystem-provided water supply services to ensure adequate water availability in both quantity and quality. Additionally, waste management activities require access to sufficient water supply services to support operational processes, including plant maintenance and treatment procedures.

Lastly, SUEZ composting activities, specifically organic waste, can be linked to the supply of biomass.

This information can be accessed on the ENCORE platform, as seen in the below figure.



Source: ENCORE platform, December 2024.

According to the ENCORE tool, SUEZ activities also depend on various regulatory ecosystem services, including climate regulation, air quality regulation, and water regulation.

Activities reliant on freshwater availability are inherently dependent on precipitation regulation services. For instance, water collection, treatment, and supply activities rely on ecosystem-driven rainfall pattern regulation to secure a stable water supply.

Additionally, SUEZ operations may be dependent on water regulation services. While certain processes benefit from natural water purification services, all SUEZ activities are subject to discharge thresholds, and operational processes are not directly reliant on ecosystem-based water purification. However, water flow regulation services play a critical role. For example, sewerage activities depend on ecosystem-provided water flow regulation, which mitigates peak water flows that could otherwise lead to flooding and damage to sewer systems and treatment facilities. Effective water flow regulation also ensures sufficient water supply during dry periods, which is essential for operational continuity, cleaning, and maintenance activities.

As a conclusion, SUEZ business model is not directly dependent on biodiversity per se, but rather on specific ecosystem services that underpin certain operational activities. Conversely, some of SUEZ activities do exert measurable impacts on biodiversity.

According to the ENCORE methodology, the potentials impacts of SUEZ activities are as follows:

- emissions of GHG;
- emissions of non-GHG air pollutants;
- generation and release of solid waste;
- emissions of toxic pollutants to water and soil;
- area of freshwater use;
- volume of water use;
- area of land use;
- area of seabed use;
- introduction of invasive species;
- disturbances (e.g. noise, light).

The first five impacts identified are addressed in other ESRS.

Below is a general overview, organised by activity, of SUEZ impacts, potential negative effects, and dependencies. All SUEZ activities may generate disturbances – such as noise, light, and odour pollution – arising from the operation of disposal facilities and waste transportation. These disturbances have the potential to disrupt or adversely affect species populations, albeit at varying intensities.

For the Water industry, the ENCORE setting is as follows:

Business	Activity	Ecosystem services dependency	Area of influence	Other potential "negative" impact on ecosystems services identified	Material or non-material impacts, and justification	Considered as having a negative impact and integrated in the assesment?
Referential		ENCORE	IBAT	ENCORE/SUEZ experts	SUEZ experts	
Water	Drinking water production plants (including drinking water catchment)	**Yes: water supply, rainfall pattern regulation services, water purification services, solid waste remediation** According to ENCORE, water supply is stated to be at a medium level of materiality rating for the "water collection, treatment and supply" sector. However, SUEZ considers its business model to be highly dependent on this service.	**1 km**	Impact area of freshwater use if the water extraction level exceeds a sustainable threshold (location dependent), and area of land use. Drinking water production plant can impact the geomorphology and hydrology of rivers, lakes and wells which can cause a negative impact on ecosystems.	Any potential impacts are controlled and monitored, through on-site analyses, in compliance with regulations. These activities are governed by prefectorial decrees, with thresholds to be respected and analyses to be carried out. They are considered material if they meet the criteria detailed in » section *5.1.2. Material impacts, risks and opportunities and their interaction with strategy and business model (SBM-3).* Small sites are considered non-material because their impacts on biodiversity is negligible. Nevertheless, SUEZ implements generic actions such as the zero phytosanitary policy.	YES
Water	Drinking water networks and distribution infrastructures	**Yes: water supply**	**1 km**	No	Drinking water networks are considered to have no impact on ecosystems and biodiversity. They are not material.	Excluded
Water	Waste water networks	**Yes: water supply**	**1 km**	Accidental discharges of wastewater into the terrestrial environment can result in ecosystem damage, spread of odours, and can directly harm organisms and the environment.	Networks are not considered material sites because maintained and operated in good conditions by SUEZ. » See section *4.1.2. Taking action on water resource challenges* for examples of technologies used to monitor and improve network efficiency.	Excluded
Water	Waste water treatment plant	**Yes: water flow regulation services, water purification services, solid waste remediation, storm mitigation services**	**1 km**	Emissions of toxic pollutants to water and soil, disturbances (e.g. noise, light), emissions of GHG, introduction of invasive species. Accidental discharges of wastewater into the terrestrial environment can result in ecosystem damage, spread of odours, and can directly harm organisms and the environment. Waste water treatment plant can impact the geomorphology and hydrology of rivers, lakes and wells which can cause a negative impact on ecosystems.	Any potential impacts are controlled and monitored, through on-site analyses, in compliance with regulations. These activities are governed by prefectorial decrees, with thresholds to be respected and analyses to be carried out. They are considered material if they are located in a significant site close to a biodiversity-sensitive area. Small sites are considered non-material because their impacts on biodiversity is negligible. Nevertheless, SUEZ implements generic actions such as the zero phytosanitary policy.	YES

For the Waste industry, the ENCORE setting is as follows:

Business	Activity	Ecosystem services dependency	Area of influence	Other potential "Negative" impact on ecosystems services identified and justification	Material or non-material impacts, and justification	Considered as having a negative impact and integrated in the assesment?
Referential		ENCORE	IBAT	ENCORE/SUEZ experts	SUEZ experts	
Waste	Incinerator (HW & NHW)	**No**	**1 km** [1]	Incineration can cause disturbances (e.g. noise, light); emissions of GHG; emissions of toxic pollutants.	These potential impacts are controlled and monitored, through on-site analyses, in compliance with regulations. These activities are governed by prefectorial decrees, with thresholds to be respected and analyses to be carried out. They are considered material if they occur on a site close to a biodiversity-sensitive area.	YES
Waste	Landfill Open (HW & NHW)	**No**	**1 km**	Disturbances (e.g. noise, light); Pollutant release: already mentioned in E1 (Emissions of GHG), E2 (Emissions of toxic pollutants to water and soil). Potential impact on local species: scavengers and pest proliferation.	These activities are governed by prefectorial decrees, with thresholds to be respected and analyses to be carried out. These potential impacts are controlled and monitored, through on-site analyses, in compliance with regulations. Also, the available impact studies indicate that these potential negative impacts are limited and confined to the site boundaries. According to SUEZ criteria, these sites are considered material, especially as soils sealed during operation are subsequently rehabilitated to promote biodiversity. Landfill surfaces can have a positive impact on biodiversity.	YES
Waste	Landfill Closed (HW & NHW)	**No**	**1 km**	These sites are no longer in operation and are monitored in accordance with current regulations.	These sites have no significant impact on biodiversity and ecosystems.	Excluded
Waste	Transfer, sorting, Recycling centre	**No**	**1 km**	Disturbances (e.g. noise, light), emissions of GHG.	Due to their configuration and predominantly urban location, these sites are not considered material. Also, environmental impact studies indicate the absence of negative impact. Nonetheless, SUEZ implements standard measures to support biodiversity.	Excluded
Waste	Organic (AD, compost, MBT, etc.)	**No: According to ENCORE, the ecosystemic service of biomass provisioning is considered to be non-material for SUEZ activities.**	**1 km**	Soil acidification could occur if the pH level of the compost is too low but it's among parameters data are checked before land spread (compensated with lime utilisation).	Due to their configuration and activity, Organic activities are considered not material. Nonetheless, SUEZ implements standard measures to support biodiversity.	Excluded
Waste	Other hazardous waste	**No**	**1 km**	Pollutant release: already mentioned in E2.	These potential impacts are controlled and monitored, through on-site analyses, in compliance with regulations. They are considered material if they occur on a site close to a biodiversity-sensitive area.	YES
Transverse	Offices	**No**	**1 km**	No		Excluded

(1) 1 km corresponds to the area studied for biodiversity impact assessments. For the 5 sites larger than 1 km², a 2 km buffer was applied.

The selection of this buffer zone is based on impact assessment studies, which consider both an immediate impact zone (300 meters) around the site and a broader study area that analyses the local context. SUEZ expertise in impact assessments indicates that a one-kilometre perimeter is an appropriate threshold.

For SUEZ Engineering and Construction activities, the ENCORE setting was as follows:

Business	Activity	Ecosystem services dependency	Area of influence	Other potential "negative" impacts on ecosystems services identified and justification	Material or non-material impacts, and justification	Considered as having a negative impact and integrated in the assessment?
Referential		ENCORE	IBAT	ENCORE/SUEZ experts	SUEZ experts	
E&C	Construction of treatment facilities	Rainfall pattern regulation services and soil and sediment retention services	**1 km**	Disturbances (e.g. noise and light), emissions of GHG, emissions of toxic pollutants to water and soil. Construction can result in the clearing and degradation of habitats, leading to loss of biodiversity and natural capital on the construction sites and surrounding areas. Construction may lead to flooding as hard surfaces reduce the land's capacity to absorb rainwater. The use of vehicles and heavy machinery can cause soil compaction, which can impede root growth.	These potential impacts are controlled and monitored, through on-site analyses, in compliance with regulations. They are considered material if they occur on a significant site close to a biodiversity-sensitive area. The impact being proportional to the size of the site.	YES

SUEZ activities are inherently connected to biodiversity, ecosystems, and ecosystem services, either through dependence or impact. Consequently, SUEZ incorporates these factors into its strategy and business model. However, this approach must be tailored to the specific local context, as each site affects the environment differently depending on its activities and location.

Resilience assessment

Following the DMA, SUEZ has not identified any biodiversity and ecosystems-related risks or opportunities which could have a financial impact on the Group. As a result, the sustainability of SUEZ activities is not at risk, and operational resilience is assured. This finding reflects the rigour of the Group's risk assessment processes and its commitment to maintaining sustainable practices that meet the highest regulatory standards.

5.1.2. Material impacts, risks and opportunities and their interaction with strategy and business model (SBM-3)

Under the CSRD, material sites are defined as those located "in or near biodiversity-sensitive areas" where operations exert a negative impact. The following section outlines the process and methodology employed to identify SUEZ material sites according to CSRD criteria. Prior to the implementation of the CSRD, SUEZ had already undertaken an analysis as part of its *Sustainable Development Roadmap 2023-2027* to establish a list of priority sites relevant to biodiversity and ecosystems. The objective was to concentrate the Group's efforts on sites where actions could yield the most significant benefits. The criteria and methodology utilised in this analysis are detailed below.

In a first instance, certain SUEZ facilities are located near biodiversity sensitive areas. A site, as established by the CSRD, is deemed to be situated in a biodiversity-sensitive area if it is one that is in, or crosses, or is situated adjacent to one of the following:

- Europe Natura 2000 areas (pertaining to birds or habitats);
- IUCN protected areas outside of Europe;
- UNESCO World Heritage sites;
- Key Biodiversity Areas (as defined by the World Database of KBA, in accordance with BirdLife International).

The Group's relevant sites for which activities with potential negative impacts are detailed in » section *5.1.1. Consideration of biodiversity and ecosystems in strategy and business model*.

Secondly, priority sites for SUEZ are those for which any of the following criteria are met:

- has a surface that is superior to 10 ha;
- is an open landfill site;
- is in or near the following:
  - Europe Natura 2000 areas (pertaining to birds or habitats),
  - IUCN protected areas outside of Europe,
  - UNESCO World Heritage sites,
  - Key Biodiversity Areas (as defined by the World Database of KBA, in accordance with BirdLife International).

Thirdly, due to the nature of the activities (treatment of wastewater) and a large number of small sites, SUEZ applies an exception for its Water France business. As such, a site is determined to be a priority for this business unit if:

- it is in or near the biodiversity-sensitive areas cited above OR has a surface superior to 10 ha;
- and the site has a significant activity capacity;
  - a wastewater treatment plant which services > 10,000 inhabitant equivalent,
  - a water production plant which produces > 7,000 m^3/day.

As a result, SUEZ Water France sites are covered by specific action plans. In addition to this, the Group still carries out general biodiversity measures (e.g. zero use of phytosanitary products) for sites which do not meet the above criteria.

To identify the location of its material sites in relation to key biodiversity areas (KBA) and protected areas (PA) zones, SUEZ utilised the Integrated biodiversity assessment tool (IBAT). Due to the volume constraints of IBAT, specifically, SUEZ included wastewater treatment plants (WWTP) > 100,000 inhabitant equivalent and production facilities with outputs greater than 100,000 m^3/day. SUEZ optimised the selection of sites included in the assessment for its Water France operations by applying the production capacity criteria outlined above. This approach was adopted to ensure relevance in assessing the potential scale of impacts on KBA and PA zones. For SUEZ Water France sites that were identified as priority sites before the CSRD implementation, regardless of their size, they were included in the assessment. As indicated in ESRS-E2, SUEZ has to use a filter to identify material sites for the first year of the report. The filter will be reduced in subsequent years.

5.2. Impact, risk and opportunity management

5.2.1. Processes to identify and assess material impacts, risks, dependencies and opportunities (IRO-1)

The description of the DMA is presented in 1.3.1. "Double materiality assessment process".

The process for identifying and assessing SUEZ actual and potential impacts on biodiversity and ecosystems was also informed by a study conducted in collaboration with an external consultant in 2022. This study aimed to evaluate both the positive contributions of SUEZ to nature and the environmental externalities associated with its operations, including impacts on air, soil, water, and biodiversity. Key dimensions examined included water stress and pollution, soil degradation, plastic pollution, and raw material scarcity. The analysis integrated insights from the 2021 IPCC and IPBES reports, emphasising the interconnections between climate, biodiversity, and quality of life. It was aligned with national and international environmental regulations and considered stakeholder expectations for measurable positive contributions to nature. Additionally, a review of competitor benchmarks was conducted, reflecting the increasing industry focus on biodiversity protection.

As an outcome, the study established specific biodiversity targets and key performance indicators (KPIs) and provided tools for monitoring and managing performance effectively.

5.2.2. Policies regarding biodiversity and ecosystems (E4-2)

Policies relating to biodiversity and ecosystems consider the impact of SUEZ activities on these matrices.

Sustainable Development Roadmap 2023-2027 – Nature pillar

The policy provides details of how SUEZ prevents, mitigate, and remediates all three actual impacts identified, presented in the previous section. In *Sustainable Development roadmap 2023-2027*, SUEZ "addresses the five drivers of biodiversity loss as identified by the Intergovernmental Platform on Biodiversity and Ecosystem Services (IPBES) through commitments":

- **Climate Change:** by reducing greenhouse gas emissions, improving renewable energy use, and adapting vulnerable sites to climate change (IRO-E4-1);
- **Land-use Change:** by reducing land artificialisation and promoting renaturation;
- **Invasive Alien Species and Direct Exploitation:** by reusing local species in renaturation to prevent the spread of invasive alien species;
- **Pollution:** by reducing micropollutants and waste management measures (IRO-E4-3);
- **Overexploitation of resources:** by preserving water resources (IRO-E4-2).

The Impacts on the state of species are addressed by the commitment to implement biodiversity action plans at 100% of material sites managed by SUEZ (IRO-E4-2). Commitments to doubling restored land annually and reducing land degradation directly address ecosystem extent and condition. Dependencies on ecosystems are minimised through measures supporting recycling and reuse, while physical and transition risks are mitigated through decarbonisation and circular economy initiatives and limit SUEZ impact on fresh water with a commitment to preserving water resources, particularly in stressed areas. These commitments are presented in the section Targets. The S*ustainable Development Roadmap* also considers the disturbances that sites can cause by drastically reduce light pollution of sites managed by SUEZ and reach zero phytosanitary products used green spaces on sites managed by SUEZ. Social impacts are addressed through stakeholder engagement programmes, including employee training, partnerships with communities.

For more detail on the *Sustainable Development Roadmap 2023-2027* please refer to ⩥ section *1.3.4. Sustainable Development Roadmap 2023-2027* of the present Sustainability Statement.

Nature Standards

Additionally, SUEZ is developing the *Nature Standard for Sites* and the *Nature Standard for Construction Sites* policies that are due to be integrated at the beginning of 2025.

The policies will contribute to the deployment of the Nature Pillar of the *Sustainable Development Roadmap 2023-2027* by rolling out new management practices for operating sites or construction sites in SUEZ operations or managed on behalf of its customers to operational teams. The policies aim to:

- provide a unified set of environmental principles for all teams;
- standardise best practices to manage sites and construction projects more sustainably;
- develop a culture of biodiversity preservation by integrating principles into project strategies and partnerships.

The objective of the Nature Standards is to define a common set of principles and practices on how to protect biodiversity and resources while participating in the circular economy for the sites managed or operated by SUEZ Group. This standard is compulsory for all the Group's priority sites in terms of biodiversity, belonging to the SUEZ Group or managed on behalf of its customers.

These policies are optional for other sites. The policies integrate biodiversity preservation into operations and aligns with regulatory requirements and stakeholder expectations. The standards address material impacts, risks, dependencies, and opportunities related to biodiversity loss and ecosystems in the following way:

- Climate Change (IRO-E4-1) and Pollution (IRO-E4-3): Both charters emphasise limiting emissions, controlling pollutants, and reducing water and soil contamination through strict handling of hazardous materials, restricted spills, and water treatment measures;
- Land-Use Change: The standards encourage minimising artificialisation and preserving ecologically sensitive areas (e.g., reducing easement zones, avoiding unnecessary infrastructure expansion);
- Invasive Alien Species: Both documents require the management in case invasive alien species are identified to prevent their spread.

Both standards require that operations consider the sensitive periods of species to avoid disrupting their life cycles. Endemic flora is prioritised for renaturation and landscaping, supporting local species and reducing global extinction risks.

Regarding the impacts on ecosystems, the policies introduce measures to protect preserved natural areas and manage green spaces ecologically.

Direct interventions like the installation of retention basins, stormwater escape routes, and careful management of soil and excavated materials prevent degradation and desertification.

Both standards reduce dependencies on ecosystems by promoting circular economy principles (e.g., recycling, reusing materials locally).

Both standards encourage preservation of water resources and the environment (e.g. water consumption is monitored (meters, invoices) and reduced to the strict minimum).

The policies specify that if the worksite is in biodiversity sensitive area, a biodiversity action plan must be designed and implemented (IRO-E4-2).

The standards address social consequences by raising awareness among workers and stakeholders to protect local biodiversity and community well-being.

The standards also consider the disturbances that sites can cause. They encourage limiting noise and light pollution by adopting dedicated measures.

Governance is managed through designated points of contact at sites responsible for implementation and monitoring, supported by regular audits and updates shared with customers and partners. These policies are accessible through on-site posters, documentation integrated into contracts, and ongoing communication to ensure alignment with key stakeholders.

Sustainable Purchasing Charter

To support *Sustainable Development Roadmap 2023-2027*, the Group's *Sustainable Purchasing Charter* was adopted across the operations and supply chain. The policy supports commitments across climate, nature, and social dimensions. In line with the Nature pillar, we will promote suppliers who contribute to the management of recycling and reuse (waste, water...) in order to preserve resources and promote the protection of ecosystems.

The objective of preservation of biodiversity, by engaging with suppliers that incorporate biodiversity preservation and resource conservation into their practices, addresses the opportunity to protect the biodiversity and ecosystems through reduction in the extraction of raw materials (IRO-E4-2). The commitment to prioritise suppliers who reduce greenhouse gas emissions and contribute to green energy initiatives, addresses our risk of climate change as a contributor to the loss of biodiversity (IRO-E4-1).

For more detail on the *Sustainable Purchasing Charter* please refer to ⩥ section *6.1.1. Policies regarding resource use and circular economy* of the present Sustainability Statement.

Policies are then translated into concrete actions on the sites.

5.2.3. Taking action on biodiversity and ecosystems (E4-3)

Actions and resources related to climate change, the main driver for biodiversity loss, have been reported in the Chapter 2 "Climate Change".

The details of actions contributing to the positive impacts on biodiversity SUEZ has implemented in 2024 are presented below. These actions are aligned with the time horizon of the *Sustainable Development Roadmap*.

Introduction of Nature Standard for Construction Sites and Nature Standard for Sites in 2024 (IRO-E4-2 & IRO-E4-3)

To contribute to the deployment of the Nature Pillar of the *Sustainable Development Roadmap 2023-2027*, SUEZ has introduced *Nature Standard for Construction Sites* and *Nature Standard for Sites* in 2024. The documents contain a list of common principles to be implemented and followed on priority sites. These standards are mandatory for each of the Group's biodiversity material sites and optional for other sites.

Elimination of phytosanitary products (IRO-E4-2 & IRO-E4-3)

To reach the commitment to "zero phytosanitary products used on sites managed by SUEZ", SUEZ launched various "zero-phyto" initiatives to eliminate chemical pesticides and fertilizers, aligning with the mitigation hierarchy by focusing on avoidance, minimisation, and restoration. The initiatives include replacing chemical treatments with natural solutions such as compost, organic fertilizers, and biocontrol methods using beneficial organisms like ladybugs. Restoration actions include transitioning ornamental lawns into wildflower meadows and prioritising the use of native plants better adapted to local ecosystems.

To prevent harmful effects on local flora and fauna, SUEZ is reinforcing the adoption of a "zero-phytosanitary" policy across all operations. While the vast majority of the sites have already achieved compliance with this standard, the objective of SUEZ is to provide concrete tools and guidance to further support teams in maintaining and strengthening this practice.

Fight against micropollutants in natural environments (IRO-E4-2 & IRO-E4-3)

To reach the commitment to "Prevent the spillage of micropollutants in natural environments", major research programmes have been dedicated to developing solutions for the treatment of micropollutants in wastewater discharges, essentially based on the transposition of processes used in the treatment of drinking water. Examples include the coupling of ozone oxidation with biological treatment processes, a process applied at the Sophia Antipolis wastewater treatment plant in France, where guarantees of monitoring of performance for the treatment of micropollutants are required by the public authorities; or the adsorption of micropollutants on activated carbon, which can be coupled with the above process, as envisaged at the Lausanne wastewater treatment plant in Switzerland and under construction at the Klar facility in Denmark.

Deployment of action plans on material sites (IRO-E4-2)

To fulfil the commitment to "Roll out biodiversity action plans at all biodiversity material sites managed by SUEZ," the Group implemented a total of 87 biodiversity action plans in 2024 across priority sites. A biodiversity action plan is specific to each material site addressing its specific challenges to effectively preserve biodiversity locally. It is generally designed by experts (environmental engineer or specialist, ecologist). It consists of a set of actions designed to preserve the biodiversity present at a facility and/or encourage its development. At the very least, it is based on an initial diagnosis of biodiversity on the site, including flora and fauna. For example, for sites of more than 10 ha including natural environments, the use of the ecological quality index (EQI) is recommended. This index was developed by the French National Museum of Natural History and SUEZ in 2008. More than 80 ecological studies have been carried out by the French National Museum of Natural History at SUEZ sites. Following the initial diagnosis, potential actions to preserve and/or develop biodiversity are identified. Once the actions have been validated by internal stakeholders, they are described in a formalised action plan with actions localised and described over time. The action plan must be monitored over time and evaluated at the end of the planned duration. Expected outcomes include the preservation and development of local biodiversity, contributing to the Company's Nature commitments. The action plans are designed to be adaptive, allowing adjustments based on new data and stakeholder feedback.

SUEZ does not use offsets as part of its action plans or objectives.

Reduction of soil artificialisation rates (IRO-E4-2)

Soil artificialisation refers to the process by which natural or agricultural land is transformed into urbanised or industrialised areas. This process alters the natural functions of the soil, impacting its ability to support biodiversity, regulate water cycles, and provide ecosystem services.

As part of its commitment to reducing soil artificialisation, SUEZ integrates landscaping and renaturation techniques into its projects. For instance, restored sites are transformed into natural habitats, with native vegetation reintroduced to support local ecosystems. These initiatives not only enhance ecological balance but also contribute to community well-being by providing green spaces for recreation and education.

SUEZ also promotes nature-based solutions in urban planning to address the growing challenges of urban territories while minimising soil artificialisation. By integrating biodiversity into urban projects, such as eco-districts, the focus is on improving citizens' quality of life and health, preserving urban biodiversity, and enabling adaptation to climate change impacts like floods, heatwaves, and pollution.

Our solutions include ecological restoration of riverbeds and banks through terracing, bank stabilisation, and planting native species. These actions are carried out for SUEZ customers. Complementary solutions involve implementing compensation operations, such as creating spawning grounds, wet meadows, and other natural habitats following the mitigation hierarchy (avoid, reduce, compensate). The biodiversity action plans required by the *Sustainable Development Roadmap* do not include offsets.

Combatting spread of invasive species (IRO-E4-2)

To reach the commitment of SUEZ to "Contain invasive non-native species", SUEZ has deployed numerous solutions and tools on sites operated or owned by the Group. In 2024, SUEZ introduced an Invasive Species Guide to address the risks they pose to biodiversity. The guide outlines their impacts, identification methods, and practical management solutions, emphasising the importance of containment to prevent their spread. Avoidance is prioritised by recommending on-site disposal of invasive plant material when feasible, under controlled conditions such as using tarped or paved areas and managing plants before seed production.

The offer to combat the invasive species of SUEZ, includes collection, logistical planning, treatment in specialised recovery centres, and practical resources such as kits and instructional materials to support effective mitigation efforts.

5.3. Metrics and targets

5.3.1. Targets regarding biodiversity and ecosystems (E4-4)

In addition to the targets set out in its *Sustainable Development Roadmap*, SUEZ has made other external commitments to promote biodiversity.

Target and mitigation hierarchy	Metric	Target		Baseline		Results		Connected policy
		Year	Value	Year	Value	2023	2024	
Roll out Nature action plans at 100% of material sites managed by SUEZ **Minimisation**	% of material sites where biodiversity action plans are deployed and implemented	(2027)	100%	2024	Evolution of the priority site definition due to CSRD and baseline reset to 2024 [1]	-	54.4%	SD Roadmap
Systematically propose an offer regarding biodiversity preservation when the site is in a biodiversity sensitive area **Minimisation**	% of commercial proposals (in biodiversity sensitive area) that include an offer towards biodiversity preservation and biomonitoring	(2027)	100%	2021	<5%	<5%	94%	SD Roadmap
Making biodiversity protection and preservation a requirement contributing to projects approval **Minimisation**	% of Group and BU projects reviewed by the management assessed on biodiversity criteria.	(2027)	70%	2024				Act4nature
Contribute to reduce the land artificialisation pace **Minimisation**	Total Cumulative Renatured Area (ha)	(2027)	Increase	2024	Evolution of the KPI & Baseline reset to 2024 [2]	-	14.8	SD Roadmap
Contain invasive non-native species **Restoration**	% of renaturation and landscaping operations using local species	(2025)	100%	2023	69%	69%	98%	SD Roadmap
Implement a phytosanitary-free policy on 100% sites operated by and owned by SUEZ with approval by the customer **Minimisation**	% of sites not using phytosanitary products	(2027)	100%	2021	73.1%	74.4%	75.2%	SD Roadmap

Target and mitigation hierarchy	Metric	Target		Baseline		Results		Connected policy
		Year	Value	Year	Value	2023	2024	
Prevent the spillage of micropollutants in natural environments Minimisation/Avoidance	% of commercial proposals for sanitation infrastructure construction in areas at stake with micropollutants removing solutions (prevention, advanced treatments etc.)	(2027)	100%	2024	First year of publication	-	50%	SD Roadmap
Create and develop existing and new SUEZ business models and solutions to accelerate natural environment regeneration and preservation Restoration/ Rehabilitation	Turnover generated by solutions identified as regenerating and number	(2027)	Create and develop existing and new SUEZ business model and solutions to accelerate natural environment regeneration and preservation	2021	1,246 K€	820 K€	1,119 k€	SD Roadmap
Engaging SUEZ employees on biodiversity preservation. Engaging SUEZ employees on biodiversity preservation	% of our employees trained through job-specific training on biodiversity.	(2027)	100%	2024	<5%	-	<5%	Act4nature
	% of awareness Tools (such as the Environment Fresk) deployment among SUEZ employees	(2027)	100%	2024	6%	-	6%	Act4nature
Engaging SUEZ value chain on biodiversity preservation	Number of partnerships established to raise awareness on ecosystems and resources preservation among SUEZ value chain	(2027)	3	2024	1	-	1	Act4nature

(1) Baseline Reset for this KPI: The baseline has been reset to 2024 due to significant changes in definition and scope related to CSRD. These changes include the introduction of priority zone types, the concept of negatively affecting these zones, and the establishment of a materiality threshold. As previous years are not comparable, this necessitated the baseline reset.

(2) Evolution of this KPI in 2024: It is more relevant to track the cumulative renatured areas rather than the number of operations per year. The cumulative values provide a clearer picture of continuous efforts, independent of annual fluctuations. Additionally, switching to surface area as a metric provides a more accurate measure of positive impact than simply counting the number of operations.Act4nature international, launched in 2018 by the French Association of Companies for the Environment (EpE), is an initiative aimed at strengthening corporate action in favour of biodiversity through pragmatic commitments backed by senior management.

The commitments of the act4nature approach are supported by the management of SUEZ, which is represented by its Chairman and CEO Sabrina Soussan (resigning from the Board of Directors on 31 December 2024 and from the Executive Board on 31 January 2025). The reporting for companies involved in act4nature takes place in two-year cycles. During each campaign, companies must account for the commitments that have reached their deadlines within that period. Companies are responsible for collecting and tracking information related to the implementation of their commitments. To this end, internal SUEZ meetings are organized on a quarterly basis.

The individual results of companies, detailing the progress of their commitments, are published on the act4nature website. In addition to these individual reports, we compile an overall assessment based on all the collected data. This overall report analyses emerging trends in the types of commitments made by participating companies and provides a general overview of the implementation of biodiversity commitments. Each company thus has the opportunity to track not only its own progress but also to contribute to a collective vision of corporate advancements in biodiversity through their act4nature commitments.

Details of how these targets are to be monitored and reviewed are given in the CSRD and SDR reporting protocols. See the section 1.3. for the definition of the roadmap. These targets cover the overall SUEZ.

SUEZ GHG emissions scope 1, 2 and 3 reductions targets track effectiveness of the actions in relation to actual negative impact of SUEZ being climate change as one of the drivers of the biodiversity loss according to IPBES (IRO-1). Please refer to the section *2.4. Metrics and Targets*.

The actual positive impact of SUEZ waste management and wastewater treatment services that contribute to the protection of the environment and ecosystems (IRO-2) is tracked by the following targets with their metrics presented in the above table:

- roll out Nature action plans at 100% of material sites managed by SUEZ;
- systematically propose an offer regarding biodiversity preservation when the site is in a biodiversity sensitive area;
- making biodiversity protection and preservation a requirement contributing to projects approval;
- contribute to reduce the land artificialisation pace;
- contain invasive non-native species;
- create and develop existing and new SUEZ business models and solutions to accelerate natural environment regeneration and preservation;
- engaging SUEZ employees on biodiversity preservation;
- engaging SUEZ value chain on biodiversity preservation.

The actual positive impact of SUEZ core businesses in water and waste management that play a crucial role in alleviating the burden on ecosystem services by reducing pollution (IRO-3) is addressed by the Reach zero phytosanitary products used on green spaces and two targets presented in E2 Pollution section:

- prevent the spillage of micropollutants in natural environments;
- drastically reduce light pollution of sites managed by SUEZ.

SUEZ did not incorporate ecological thresholds, such as planetary boundaries or sustainability limits, in the definition of its targets. Ecological thresholds were not entity-specific, and no methodology for defining or allocating responsibility for respecting these thresholds was established.

5.3.2. Material sites with negative impact on biodiversity (E4-4)

Indicator	Unit	2024
Number of material sites located in or near biodiversity sensitive areas	Site number	342
Number of material sites located in or near biodiversity sensitive areas with a negative impact on biodiversity	Site number	68
Total surface of sites located in or near biodiversity sensitive areas with a negative impact on biodiversity	ha	977

SUEZ has identified 342 sites near biodiversity sensitive areas. 68 sites are considered as having a negative impact on biodiverstity. SUEZ also has its own definition for material biodiversity sites that complements the criteria imposed by the CSRD, incorporating specific criteria related to its activities.

Indicator	Unit	2024
SUEZ DEFINITION – Number of material sites located in or near biodiversity sensitive areas with a negative impact on biodiversity (CSRD criteria + criteria's defined in chapter 5.1.2)	Site number	160
Number of material sites according to SUEZ definition with a Biodiversity Action Plan	Site number	87
% of SUEZ priority site "Biodiversity Action Plan" coverage	%	54.4%

5.3.3. Metrics methodology regarding biodiversity and ecosystems

Reporting perimeter coverage

The CSRD regulation aims to align financial and non-financial reporting scopes. To meet this requirement, every financial entity consolidated in the group's financial results must collect relevant non-financial data if deemed material. A site is considered material if its activities significantly impact the company's sustainability performance and revenue or if it is exposed to sustainability-related risks and opportunities.

This rule applies regardless of how long the entity operated during the reporting year. In previous sustainability reporting under the NFPS (Non-Financial Performance Statement), data integration was only required if the entity had been under SUEZ operational control for at least six months.

For this sustainability statement, all financial entities within SUEZ Business Units and Business Partners (such as support services, innovation, etc.) were assigned a dedicated environmental reporting entity or were included within a broader reporting structure.

For ESRS E4, two types of perimeter exclusions rules and a site-by-site approach were applied for metric disclosures:

Exclusion based on activity type

Some activities were excluded because they were not considered to have a significant negative impact on biodiversity under normal conditions, except in cases of specific malfunctions or accidents.

- in the waste sector, this includes sorting activities, transfer stations, collection services, and closed landfills (which are covered and no longer receiving any waste);
- in the water sector, this includes drinking water distribution networks and wastewater collection networks.

On the other hand, activities that were specifically considered and selected for their potential negative impact on biodiversity include:

- in the waste sector, incineration and open landfill operations (both hazardous and non-hazardous);
- in the water sector, drinking water production plants and wastewater treatment plants.

Exclusion based on size and activity volume: materiality threshold

Similarly to the methodology applied in ESRS E3, for Water Activities in France, a materiality threshold was applied to distinguish sites with a significant impact on biodiversity from the numerous sites with negligible impact due to their small activity scale. These thresholds are:

- for wastewater treatment plants: 10,000 inhabitant equivalents;
- for water production sites: 7,000 m^3 per day.

For the first year of CSRD reporting, these thresholds were adjusted for simplification purposes, with a primary focus on the most significant sites. However, the standard thresholds will be fully applied in the coming years. The temporary thresholds used for this first reporting year are:

- for wastewater treatment plants: 100,000 inhabitant equivalents;
- for water production sites: 100,000 m^3 per day.

In addition to this first-year threshold, some sites historically identified as priority sites by Water France – due to their proximity to nature conservation areas – were included in the 2024 assessment, even if they were below the first-year threshold.

Summary of Priority Sites Assessed in 2024 for water France only:

- 51 wastewater treatment plants (out of 1,661), including the largest ones and those historically identified as priority sites;
- 22 drinking water treatment plants (out of 544), including the largest ones and those historically identified as priority sites.

All other international wastewater treatment plants and drinking water production plants were included in this year's assessment.

Site-by site approach

A site-by-site approach using satellite interpretation was also initiated to exclude specific sites located in areas where it is highly challenging for SUEZ to implement biodiversity actions.

In 2024, two sites were excluded because they were situated within a client's chemical platform, surrounded by multiple third party-operated infrastructures, creating a significant separation between these sites and the nearest protected area.

Along with the exclusion rules outlined above, the site-by-site approach will be further refined in the coming years.

Metrics accounting rules

As part of the "operational control" analysis required by the European Sustainability Reporting Standards (ESRS) E4 that applies to specific data points such as biodiversity-sensitive sites, an entity is considered under SUEZ operational control if "the undertaking has the ability to direct the operational activities and relationships of the entity, site, operation, or asset," regardless of ownership. In line with the guidance provided by EFRAG, SUEZ considers that its operational control perimeter is aligned with its financial control one.

Based on its understanding of the available guidance, SUEZ elected to include third-party assets associated with contracts or sites it does not own as long as they are part of a consolidated entity. This includes third-party assets under:

- operation and maintenance (O&M) contracts;
- concession contracts, where SUEZ operates the asset but does not own it.

For assets under SUEZ operational control:

- metrics are fully included, regardless of SUEZ ownership share.

For assets not under SUEZ operational control:

- metrics are included proportionally to the equity share in the case of Joint Operations;
- metrics are excluded in the case of Joint Ventures or not financially consolidated entities.

6

RESOURCE USE AND CIRCULAR ECONOMY (E5)

RESOURCE USE AND CIRCULAR ECONOMY

Subtopic	Code	IRO	Type	SD Roadmap 2023-2027 Commitments
SUEZ, AN ESSENTIAL SOLUTIONS PROVIDER				
Resource inflows, including resources use	IRO-E5-3	Regulations promoting a circular economy and reducing raw material usage present a significant opportunity to leverage our expertise in waste and resource management.	O	Support reuse and recycling
	IRO-E5-7	Reducing of customers' waste at source (industrial and local authorities) through performance-based contracts.	I+	
Resource outflows related to products and services	IRO-E5-4	The possible inclusion of incineration in the EU European Trading Scheme (ETS) Regulation by 2028, which sets a cap on GHG emissions, presents a dual opportunity: 1/development of upstream recycling to limit and reduce the fossil content of incoming waste and related emissions. 2/development of future projects to turn residual waste into new resources (waste-to-X facilities [1], carbon capture use and storage).	O	
	IRO-E5-5	Preservation of natural resources on the upstream and downstream value chain through activities of prevention, reuse selective collection, sorting and recycling.	I+	
Resource outflows related to products and services	IRO-E5-6	Value creation around alternative treatment for residual waste through energy recovery and conversion of CO_2 into sustainable aviation fuel (SAF) for maritime and aviation sectors or other molecules.	O	
SUEZ, AN OPERATOR OF INDUSTRIAL EXCELLENCE				
Waste	IRO-E5-1	Increased costs due to the difficulty in sourcing business-critical raw materials (chemicals, water, building materials, metals, etc.).	R	Support reuse and recycling
Resource inflows, including resources use	IRO-E5-2	Changes in regulations that reduce the amount of waste eligible for incineration or landfill disposal necessitate significant adjustments to the Company's strategy and business model.	R	

I+ Positive Impact I- Negative Impact R Risk O Opportunity

MATERIAL POLICIES

- Resources preservation and Circular Economy policy.
- Sustainable Development Roadmap 2023-2027
- Sustainable Purchasing Charter

ACTIONS ON MATERIAL IMPACTS

- Transformation of the Business Model
- Implementation of Performance Contracts
- Support of waste prevention, reuse and recycling
- High-performance sorting centre
- Scaling Carbon Capture

(1) Waste-to-X refers to an alternative waste flow treatment that produces a variety of products (methanol, ethanol, biofuel...) that can contribute to the circular economy.

6.1. Impact, risk, and opportunity management

For over a century, SUEZ has delivered innovative waste and water management solutions to local authorities and industries, ensuring safety, resource preservation, and environmental protection through the most advanced available techniques. Today, as a leading actor in these sectors, SUEZ plays a pivotal role in advancing the circular economy, prioritising waste prevention, reduction, reuse, and recovery.

The Group's business model continuously evolves to maximise the value of waste materials by shifting them up the waste hierarchy – from landfill minimisation and energy recovery to recycling, reuse, and prevention.

In 2024, through its entire value chain, 13.1 million people benefited from the Group's municipal waste collection services (identical order of magnitude for CSRD accounting rules), and 7.8 million tons of recovered materials were produced (including secondary raw materials, materials prepared for energy recovery, materials used as organic fertilizers, ...) (7.2 according to CSRD accounting rules).

The Group's activities follow the waste hierarchy as a guiding principle, with its value proposition across the full waste management cycle aligned with the waste pyramid:

1. **Manage Waste:** SUEZ provides clients with advice on waste production, supports the segregated collection and transport of waste, and ensures it is prepared for reuse or recycling. The appropriate waste management scheme is dictated by regulatory requirements and the nature of the waste itself. As an operator, SUEZ adapts its activities to apply these regulatory guidelines within the relevant regions, bringing its expertise and advanced technologies to treat waste;
2. **Recycle and Recover Waste:** SUEZ recycles specific waste streams and transforms waste into new resources, both material and energetic;
3. **Reduce Environmental Impact of Waste:** SUEZ promotes responsible waste management behaviours and encourages the transition to a circular economy.

Prevention and reuse are positioned at the top of the waste hierarchy, as extending the life cycle of products helps reduce the depletion of natural resources, mitigate carbon emissions, and limit the biodiversity impact associated with the extraction and processing of virgin materials. The shift from landfill disposal to energy and material recovery is already underway in developed regions and is accelerating globally. SUEZ adapts its strategy to match the evolving demands of different markets while providing tailored solutions to clients across diverse geographies, each with varying levels of maturity regarding circular economy principles.

To optimise waste recovery, the Group operates several types of facilities, including:

- voluntary waste drop-off centres/waste collection centres;
- reuse facilities;
- sorting and recycling centres;
- alternative fuel production facilities such as solid recovered fuel (SRF), wood and refuse-derived fuel (RDF) production units;
- dismantling and disassembly facilities: waste electrical and electronic equipment, cables, end-of-life vehicles, batteries, bulky waste, furniture, etc.;
- facilities for reprocessing specific recyclable materials already sorted for conversion into secondary raw materials. Each site processes incoming materials with a view to recycling them and promoting circular economy models;
- hazardous waste treatment facilities and associated services.

In addition to mechanical recycling techniques, biological solutions also present opportunities for recovery:

- composting platforms: household waste, urban or industrial sludge, green waste, livestock sludge, grease, etc.;
- bio-deconditioning and mechanical-biological treatment units;
- anaerobic digestion plants.

Lastly, energy-from-waste plants and landfills complete the cycle for waste for non-recyclable waste, generating recovered and/or renewable energy and optimizing by-products, such as incinerator bottom ash which can be repurposed for roads construction.

Screening of assets and activities

SUEZ has conducted a screening of its assets and activities related to both waste and water business to identify actual and potential impacts, risks, and opportunities related to resource use and circular economy. This screening covers the upstream and downstream value chain.

Please refer to ⩥ section *1.3.1. Double materiality assessment process* of the report for additional information.

6.1.1. Policies regarding resource use and circular economy (E5-1)

Circular economy impacts, risks and opportunities are addressed by different policies at SUEZ: *Resource Use and Circular Economy Policy, Sustainable Development Roadmap 2023-2027* and the *Sustainable Purchasing Charter*. These policies apply to the own operations of SUEZ as well as upstream and downstream value chains.

Resource Preservation and Circular Economy Policy

The policy prioritises advancing waste management up the hierarchy – emphasising prevention, reuse, and recycling over incineration and landfill – in alignment with evolving regulatory frameworks (IRO-E5-2). It also promotes performance-based contracts with local authorities to reduce residual household waste and, consequently, dependence on incineration and landfill (IRO-E5-2, IRO-E5-7). The policy aims to leverage SUEZ expertise in waste management (IRO-E5-3) by embedding circular economy principles throughout the value chain. The policy promotes measures such as reuse and recycling to reduce reliance on raw materials while converting residual waste into secondary raw materials or renewable energy (IRO-E5-4). It also emphasises selective collection and sorting as critical practices and highlights efforts to recycle plastics and metals into new materials (IRO-E5-5). Key initiatives include innovation-driven solutions such as smart waste characterisation or water reuse technologies, supported by stakeholder engagement across the value chain.

While the circular economy is primarily associated with materials and waste management, it is also relevant to water activities. The policy supports circularity in water resources by optimising water use, and repurposing by-products such as sludge from wastewater treatment plants.

As a result, the policy will apply across all SUEZ activities.

The policy is overseen by the Group Chief Sustainability Officer and implemented in alignment with the *Sustainable Development Roadmap 2023-2027*. The CSR Committee will conduct an annual review to assess progress.

The policy also reinforces SUEZ commitment to evolving its business models toward greater circularity, ensuring long-term resilience while addressing biodiversity and climate challenges. It aligns with global frameworks, including the United Nations Sustainable Development Goals, OECD principles on water governance, and the European Union Circular Economy Action Plan.

Currently in its finalisation stage, the policy is undergoing consultations with key stakeholders. Once completed, it will be communicated to all Business Units and made publicly available on the SUEZ website in the coming months.

2023-2027 Sustainable Development Roadmap – focus on Circular Economy

The roadmap addresses several circular economy-related material impacts, risks, and opportunities by committing to short and medium-term objectives. Regarding waste management activities, one of SUEZ commitments is to support recycling and reuse through improved sorting efficiency which SUEZ measures in tons recovered and by waste recovery rate (material and energy recovery) (IRO-E5-5). Regarding resource use, SUEZ promotes a sustainable approach by limiting its impact on fresh water (IRO-E5-5), improving resource efficiency (IRO-E5-3 and IRO-E5-4), and making its own electricity consumption more sustainable.

For further detail on the *Sustainable Development Roadmap 2023-2027* please refer to ⩥ section *1.3.4. Sustainable Development Roadmap 2023-2027* of the present Sustainability Statement.

In line with the Group's strategy, commitments taken in the roadmap were defined through a review of stakeholder expectations, outlining the most important issues, and close dialogue with subsidiaries as part of the development of their medium-term plans.

The targets associated were revised by the Executive Committee and CSR Committee prior to final approval by the Board. They were then presented before the European Works Council.

Sustainable Purchasing Charter

SUEZ has adopted the *Sustainable Purchasing Charter,* to support the implementation of the *Sustainable Development Roadmap 2023-2027* all over the value chain. The charter is designed to achieve four objectives on climate change mitigation, responsible governance, social and territorial commitment and biodiversity preservation. Regarding this issue, the charter will promote suppliers who contribute to the management of recycling and reuse (waste and water) to preserve resources:

The Group Director Procurement holds the highest level of accountability for implementing the policy. SUEZ is committed to upholding international standards and initiatives, including the International Labour Organization (ILO) Fundamental Conventions and the 10 Principles of the United Nations Global Compact.

The policy also addresses the risk of rising costs associated with the challenges of sourcing critical raw materials for business operations (IRO-E5-1).

6.1.2. Taking action on resource use and circular economy (E5-2)

The growing scarcity of raw materials underscores the need for resource recovery and optimization. This trend is evident across all countries where SUEZ operates, as regulations increasingly support the transition to a circular economy. Since 2022, European states have been implementing regulatory measures aligned with the European Commission's Circular Economy Package, emphasizing waste reduction, reuse, and recycling.

SUEZ outlines its 2024 actions to achieve circular objectives in the following categories:

New business models to promote prevention and waste reduction

Transformation of the Business Model (IRO-E5-2)/medium and long term

To address regulatory risks and reduce reliance on incineration and landfill, SUEZ is evolving its business model to offer clients enhanced services higher up the waste hierarchy. This strategic shift is reflected in the *Resource Preservation and Circular Economy Policy*, which emphasises the development of performance-based contracts to help clients implement circular solutions and improve resource efficiency.

Implementation of Performance Contracts (IRO-E5-7)/short and medium term

SUEZ has introduced performance-based contracts focused on waste prevention and reduction in partnership with pioneering local authorities in France. This new contract model extends beyond waste collection, integrating ambitious prevention and recycling objectives. These contracts set clear performance targets, aiming to reduce waste sent for energy recovery and enhance sorting at source through innovative prevention and awareness-raising initiatives. Following Montauban, the first pilot city, Limoges, La Rochelle, and Nîmes have adopted this new approach.

Several actions will be implemented, depending on the local context, such as:

- awareness-raising campaigns to help citizens sort their waste. The «Mon Service Déchets» app, which makes it easier to access information on waste management and offers tips on how to sort and recycle, is deployed;
- support for the creation of a recycling center to encourage donation and reuse;
- collection and recovery of biowaste;
- removal of illegally dumped waste.

Aside ADEME's definition, SUEZ considers a performance contract as any contract with local authorities that has a target for either waste reduction and/or increasing re-use, recycling, recovery volumes and/or a landfill diversion target, impacting the remuneration of the operator.

In the UK, SUEZ has been implementing similar performance-based contracts with local authorities for several years, integrating specific targets for recycling and landfill diversion to accelerate the transition to a circular economy.

SUEZ and Greater Manchester waste, reuse, and recycling contracts (IRO-E5-2)/short term

SUEZ is the contractor for Greater Manchester's waste and resources management services to treat 1.1 million tons of municipal waste from over 1 million households across nine boroughs with a combined contract value of over £1 billion. The two contracts include the operation of 41 facilities over 24 sites including, 4 mechanical treatment and rail head reception facilities, 20 household waste recycling centres, 8 transfer loading stations, a materials recovery facility, the Bolton thermal recovery facility, and the creation of a Renew Hub.

The Renew Hub supports a network of Renew shops, with all sales proceeds directed to community initiatives. As part of this commitment, SUEZ donates £100,000 annually from shop sales to the Greater Manchester Mayor's Charity, which focuses on reducing homelessness, and £220,000 per year to the *Recycle for Greater Manchester* (R4GM) Community Fund. The R4GM fund provides financial support to third sector and community organisations for local projects aimed at reducing waste and increasing recycling and reuse.

The Hub also features dedicated workstreams for repairing white goods and small electrical appliances, restoring and upcycling furniture, and bicycle repair and maintenance. These activities are delivered in partnership with qualified organisations that offer workshops, apprenticeships, and volunteer training, equipping individuals with essential skills for the green economy. To date, the initiative has created more than 20 green jobs, with further expansion planned to enhance social value.

As part of its contract, SUEZ has committed to delivering 54 social value initiatives while improving recycling rates. Through operational interventions, the recycling rate has increased from 44% in 2019/20 to 58% in 2023/24, with a target of 60% by the end of the 10-year contract. Additionally, over 99% of Greater Manchester's municipal waste is now diverted from landfill, exceeding the contract target of 98%.

Optimisation of sorting and recycling techniques to enhance material recovery

Resource Optimisation and performance (IRO-E5-1)/short term

SUEZ converts waste into secondary raw materials such as metals, plastics, glass, and paper, reducing dependence on virgin resources. The Group also collaborates with industries to accelerate the transition to circular business models and support decarbonization efforts through strategic partnerships. For example, the RecyCâbles initiative, a joint venture with Nexans, has positioned SUEZ as the European leader in cable recycling, processing 30,000 tons of non-ferrous metals – primarily copper and aluminium – annually. In 2024, SUEZ partnered with Renault group in The Future Is NEUTRAL to advance the circular economy in the automotive sector. By leveraging its expertise, SUEZ is helping the industry reduce its reliance on virgin raw materials while strengthening sovereignty over strategic resources. Key initiatives include deploying advanced sorting and recycling technologies and promoting circular economy practices across the waste hierarchy.

SUEZ also provides solutions for organic waste recovery, which play a critical role in the circular economy by diverting waste from landfill while generating local green energy through anaerobic digestion. Additionally, compost and biofertilizers produced from organic waste serve as sustainable alternatives to synthetic fertilisers, improving soil health and preserving water resources. SUEZ expertise in waste collection is also essential for resource preservation, as effective recycling begins with better sorting at the source. To promote this, the Group develops incentive-based systems that encourage responsible behaviour for proper waste separation.

For example, in the UK, the *flexible plastic fund (FPF) FlexCollect* project was launched in May 2022 to identify the most effective methods for collecting and recycling flexible plastic packaging. Over three years, curb side collection trials have been conducted across nine waste collection authorities. Early results indicate strong household participation and high material quality, with 90% of collected flexible plastic deemed recyclable. Further data will help assess the system's scalability and long-term efficiency.

Supporting reuse and recycling (IRO-E5-5, IRO-E5-3)/short and medium term

To enhance waste sorting and recycling, SUEZ leverages artificial intelligence as a key tool for optimising waste management. By partnering with startups and developing in-house solutions, SUEZ helps customers improve waste flow traceability and gain deeper insights into their waste streams. These innovations aim to maximise the performance of SUEZ core activities, enhance service quality, and expand its portfolio of advanced waste management solutions.

For sorting centres, SUEZ has developed *Autodiag*®, an AI-powered solution that continuously analyses and calculates the mass purity of outgoing material flows in real time before baling and dispatch, ensuring higher recycling quality and efficiency.

SUEZ drives reuse initiatives through client contracts and partnerships, advancing waste up the hierarchy while making second-hand items more accessible to local communities. In the UK, this includes the *Renew Hub* in Greater Manchester and the establishment of reuse shops at household waste recycling centres in collaboration with local authorities, such as Cornwall Council. In France, SUEZ works with social and solidarity economy partners to create dedicated reuse centres *(ressourceries),* encouraging donations and extending product lifecycles.

Additionally, SUEZ supports entrepreneurship programmes, such as *Les Boucles* in France, to help small businesses develop circular economy solutions, with a particular focus on reuse.

High-performance sorting centre (IRO-E5-3)/short-term

SUEZ new high-performance sorting centre in Épinal demonstrates its commitment to advancing the circular economy through cutting-edge waste management and recycling solutions. The facility enhances resource efficiency by optimising the recovery of technical and biological materials, supporting the transition to a more sustainable supply chain. By processing a broader range of household plastic packaging, the centre increases recycling rates and facilitates the reintegration of secondary raw materials into production cycles. Designed with circular economy principles at its core, it utilises advanced sorting technologies to maximise material reuse, repurposing, and recycling – reducing reliance on virgin raw materials. The facility has the capacity to recycle 25,000 tons of plastics annually, including coloured PET (e.g., oil bottles), opaque PET (e.g., certain milk bottles), PET trays (e.g., for pastries, fruits, and vegetables), and polystyrene (e.g., yogurt pots and trays).

Developing new business around incineration

Scaling Carbon Capture (IRO-E5-6, IRO-E5-4)/medium and long-term

SUEZ is innovating to integrate carbon capture, utilisation, and storage (CCUS) into circular economy practices, transforming CO_2 into valuable resources and closing material loops. By leveraging CCUS, SUEZ enhances industrial resource efficiency and reduces reliance on critical raw materials. The Group is actively exploring solutions to convert captured CO_2 into high-value products, supporting the transition to a low-carbon economy. Key applications under assessment include decarbonising transport through the production of alternative low-carbon fuels *(eFuels)* and developing innovative uses such as chemical conversion and mineralisation.

In the UK, SUEZ is advancing CO_2 capture and storage projects within the *East Coast Cluster,* aiming to capture up to 900,000 tons of CO_2 annually from the Tees Valley Haverton Hill and Wilton energy-from-waste facilities. The captured CO_2 will be permanently stored in an aquifer under the North Sea, with utilisation opportunities also under evaluation. SUEZ has completed initial pre-front-end engineering and design (pre-FEED) studies at both sites and plans to submit a funding request to the UK government under the *Industrial Carbon Capture Track-1 Expansion* project.

In France, at the *Terres d'Aquitaine* anaerobic digestion site in the south-west, SUEZ has partnered with Prodeval to capture and purify CO_2 from biogas for local reuse in greenhouses to enhance crop yields. The facility, supported by the local authority *(Région Nouvelle-Aquitaine),* which has financed 40% of the project, is set to begin operations in Q1 2025. Once fully operational, it will capture and reutilise up to 3,900 tons of biogenic CO_2 per year.

Optimising the outflows of landfilling

SUEZ and CMA CGM partnership (IRO-E5-6)/short and medium-term

SUEZ, in partnership with the CMA CGM group, is driving circular economy innovation by developing biomethane production in Europe to support the decarbonisation of maritime transport. By harnessing organic waste from SUEZ facilities, this initiative exemplifies resource efficiency and the transformation of waste into renewable energy. The production of waste-derived biomethane reduces reliance on fossil fuels in maritime operations, integrating a sustainable energy source into the supply chain. SUEZ applies circular business practices by maximising value creation, converting waste streams into high-value energy products. This partnership underscores SUEZ role in enabling low-carbon transitions while addressing resource optimisation and waste management challenges. By advancing biomethane as a alternative fuel, SUEZ and CMA CGM align maritime transport with circular economy principles.

Optimising landfills for more circularity (IRO-E5-2)

The transition from landfill to energy and material recovery is already underway in developed countries and is rapidly gaining momentum in emerging markets. In Meknes, Morocco, SUEZ has built a waste recovery project that transforms an existing landfill into a facility capturing methane to generate energy. The site includes sorting, biogas recovery, leachate treatment (with 50,000 m^3 treated annually), and compost production facilities. In addition to those actions, SUEZ is collaborating with local authorities to integrate social initiatives into the project. Informal waste sorters working at the site have reorganized into a cooperative, providing employment opportunities for 180 sorters, further promoting community involvement, and enhancing the social impact of the project.

6.2. Metrics and targets

6.2.1. Targets regarding resource use and circular economy(E5-3)

		Target		Baseline		Results	
Target	Metric	Year	Value	Year	Value	2024	Policy
Improve SUEZ sorting efficiency (IRO-E5-5, IRO-E5-3) Recycling & Recovery Business Recycling Recovery	Waste recovery rate (including energetical recovery)	(2027)	↗	2023	48% [1]	49%	SD Roadmap
	Tons recovered (ktons)			2023	11,577 ktons	11,795 ktons	SD Roadmap
Tens of millions investment for carbon capture (see § 2.2.2) (IRO-E5-6, IRO-E5-4) Recycling & Recovery Business Recovery Disposal	Energy from Waste activities: cumulated investment in carbon capture	(2027)	Tens of millions €	2023	€1.4 million	€5.5 million	SD Roadmap
Reduction of natural resources depletion (IRO-E5-5) Recycling Recovery	Secondary raw materials production	(2027)	↗	2023	2.65 million tons	2.46 million tons	Resource Use and Circular Economy
Business model transformation (IROE5-7) Recycling & Recovery Business Prevention Reuse Recycling	Number of performance contracts	(2027)	↗	2023	59	73	Resource Use and Circular Economy

(1) The baseline for this KPI had to be restated in 2023 due to the CSRD's evolutions:

- *the calculation scope of this KPI (financial control under ESRS E5 instead of operational control);*
- *the classification of "waste" and "outflows" for SUEZ, which impacted the flows included in the calculation.*

Those targets refer either to the ones of the *2023-2027 Sustainable Development Roadmap* (please refer to ESRS 2 for more details on the way they were defined and how they are revised), or to targets related to the *Resource Use and Circular Economy Policy*. They were defined after internal consultations with key experts on circularity.

The number of performance contracts gathers, over a year, the contracts fitting with the definition aforementioned of performance contracts: any contract with local authorities that has a target for either waste reduction and/or increasing re-use, recycling, recovery volumes and/or a landfill diversion target, impacting the remuneration of the operator. The target will be reviewed on an annual basis to integrate contracts won or lost during the year.

Sustainable purchasing

SUEZ is guided by a qualitative commitment outlined in its *Sustainable Purchasing Charter*: "Respecting the environment and contributing to the conservation of resources and biodiversity." To address procurement-related risks, SUEZ business units have launched initiatives aimed at enhancing the resilience and sustainability of their supply chains, particularly in response to the rising costs and challenges of sourcing critical raw materials such as chemicals, water, building materials, and metals (IRO-E5-1). These initiatives involve detailed supplier mapping to identify risks associated with the sourcing of critical raw materials, enabling a comprehensive understanding of supply chain vulnerabilities and opportunities for improvement. For instance, in hazardous waste stabilisation, SUEZ is actively developing new processes to reduce reliance on cement, thus decreasing dependency on raw materials.

Although no measurable target has been set yet, these actions lay the foundation for future Group-wide targets. Progress is tracked through the integration of sustainability considerations into procurement decisions, with qualitative evaluations aligned with the principles of resource conservation and biodiversity preservation. SUEZ will build on these foundational steps to define measurable, outcome-oriented targets moving forward.

Improve sorting efficiency

SUEZ recognises the need for measurable, outcome-driven targets to assess progress on identified risks and opportunities. Although specific targets have not yet been defined, the Company actively monitors sorting efficiency through key metrics such as waste recovery rates and tons of material recovered.

These metrics are aligned with three key SUEZ opportunities and positive impacts:

- regulatory support for the circular economy and reduced raw material usage presents an opportunity to enhance waste management expertise (IRO-E5-3);
- the potential inclusion of incineration in the EU ETS by 2028 offers a dual opportunity: advancing upstream recycling to reduce fossil content and emissions, while developing projects to convert residual waste into new resources (IRO-E5-4);
- preserving natural resources by reducing the extraction and use of virgin materials through selective collection, sorting, reuse, and recycling is critical (IRO-E5-5).

Investments in carbon capture

With an investment of tens of millions of euros in carbon capture by 2027, SUEZ is actively monitoring its progress towards emerging business opportunities and the value creation opportunities surrounding residual waste and CO_2 (IRO-E5-6), particularly in anticipation of the potential inclusion of incineration in the EU ETS Regulation (IRO-E5-4).

Performance contracts

SUEZ has not yet established specific targets for reducing customers' waste at source through performance contracts (IRO-E5-7). This is primarily due to external factors beyond the Company's control, such as client demand for performance-based tenders. While SUEZ expects the adoption of such contracts to grow over time, it is not currently relevant to set quantitative targets for those contacts.

Even if there is no global objective at the Group level, each contract includes defined performance objectives. For example, in Montauban, SUEZ has committed to reducing household waste by 12%, bulky waste by 35%, green waste by 15%, and selective packaging collection by 2%. A key qualitative objective remains the continuous improvement of these indicators year after year.

Exploring new business models and enhancing recycling

SUEZ has not set a specific, measurable, time-bound target for addressing regulatory changes that reduce the volume of waste eligible for incineration or landfill disposal, which could require significant adjustments to its strategy and business model (IRO-E5-2). However, the Group actively advances initiatives to expand its business models to maximise the value of waste materials by shifting them up the waste hierarchy – from landfill minimisation and energy recovery to recycling, reuse, and prevention. This includes shifting from traditional landfill or incineration contracts to performance-driven models that prioritize material recovery and recycling improvements. Additionally, SUEZ is exploring ways to create value from incineration processes by capturing CO_2 and utilising it for various applications, such as greenhouses, chemical processes, and e-fuels.

While there are no direct targets for IRO-E5-2, progress is tracked through related indicators, including the waste recovery rate, total tons recovered, and secondary raw materials produced.

Although SUEZ targets are primarily voluntary, they align with regulatory frameworks and sectoral objectives. The Company complies with key legislative requirements such as the Taxonomy Regulation for sustainable economic activities, Directive 2000/76/EC on waste incineration, and the E-PRTR Regulation (166/2006) for waste management and emissions. While EU and national regulations set recycling rate targets that shape operations, SUEZ frequently exceeds compliance requirements. For example, its non-hazardous waste sorting and recycling activities convert more than 50% of collected waste into secondary raw materials, surpassing taxonomy thresholds.

6.2.2. Resource inflows (E5-4)

For SUEZ, inflows are defined as materials, products, and assets essential to the Group activities. They can be defined as:

- for all SUEZ activities:
  - Purchases: Chemicals, equipment, vehicles,
  - Infrastructures: Plants.
- for Recycling & Recovery activities:
  - wastes from third parties or other SUEZ sites entering SUEZ sites for TREATEMENT (i.e. purely collected waste are excluded),
  - sludge produced by third party or other SUEZ water sites incoming to SUEZ waste sites for treatment;
- for water activities:
  - incoming mineral and organic materials, diluted and contained in raw water and wastewater.

All inflows are classified in two categories:

- technical material: Incoming waste not sorted and/or not organic, chemicals, equipment, plants, vehicles;
- biological material: Incoming organic flows like Waste Water Treatment sludge, paper and cupboard sorted, composts, biowaste & green waste sorted, wood sorted, or waste sent to Anaerobic Digestion.

Not all of these inflows are considered material for SUEZ. Chemical products used in processes are considered "non-material" for waste management activities, as they account for less than 1% of total site inflows (with waste entering for treatment representing the vast majority). In contrast, for water activities, chemicals are considered "material" and are included in metric calculations, as they represent approximately 15% of total inflows.

SUEZ waste business also relies on incoming products (consumables...), vehicles, buildings, plants, equipment's but they are considered "nonmaterial" due to their negligible volume compared to treated wastes tonnages. However, they are critical for waste activities as businesses can't be operated without that equipment.

SUEZ water business also relies on infrastructure investments such as desalination plants, advanced digital tools (e.g., smart sensors), and operational equipment to enhance network efficiency and water resource management. These inputs, while critical, are minor compared to the volumes of water and wastewater sludge processed.

Inflows indicators

Indicator	Unit	2024
Overall total weight of products and technical and biological materials used during the reporting period	ktons	30,871
Water – Technical material – Chemicals	ktons	225
Water – Biological materials – DW & WWT Sludge produced	ktons	522
Waste – Technical material – Tonnages treated: Non purely biological wastes (includes mixed wastes)	ktons	27,636
Waste – Biological material – Tonnages treated: Biological wastes	ktons	2,487
*Percentage of biological materials (and biofuels used for non-energy purposes) used to manufacture the undertaking's products and services (including packaging) **that are sustainably sourced***	%	0 [1]

(1) This indicator tracks biologically sustainable sources that are covered by a certification scheme. For SUEZ, some waste inflows may be certified under such schemes (e.g., RED II biomass certification), but these certifications are not disclosed for 2024.

6.2.3. Resource outflows and wastes (E5-5)

Outflows

For SUEZ outflows are defined as products and valuable materials:

- that leaves SUEZ boundaries;
- that have a positive monetary value for SUEZ (sold materials) or transferred to third parties within a contractual agreement for recovery purposes: soil fertilization, material recoveries, facility feedstock...
- a market or demand exists for such a substance or object;
- they are considered as assets for SUEZ.

Are considered as outflows:

- outgoing materials prepared for further recovery (sorted, shredded, unpackaged...): plastic bales, shredded iron;
- outgoing secondary raw materials (material that can enter directly industrial processes): plastic pellets, paper fibres...
- outgoing Solid Recovery Fuels and Refuse Derived Fuels (in the UK perimeter: RDF are not sold to a client, but instead endure a gate-fee at the entrance of energy-from-waste facilities, they are considered as a waste);
- outgoing compost, digestate and sludge for direct land spreading;
- outgoing incinerator bottom ash (IBA) recovered by a third party or internally (will leave the facility after the recovery).

Energy produced by SUEZ (electricity, heat, biogas, biomethane) are not considered as an outflow because they are already accounted in » section *2.4.2. Energy consumption and production* (E1-5).

Water produced, distributed, collected, or treated are already covered in » section *4.2.2. Water withdrawal, discharges and consumption* (E3-4).

Constructed plants (Design, Engineering and Construction...) are outflows but they are not accounted individually.

Durability and reparability are not applicable to the products of SUEZ, given their nature as non-conventional products (e.g., water, SRF, sludge, compost). SUEZ does not use recycled components, the rates of recyclable content in products and products packaging are not applicable to SUEZ.

OUTFLOWS INDICATORS

Indicator	Inclusion	Unit	2024
Secondary raw materials	Materials (paper, plastics, metals...) that can be used in an industrial process as a replacement for virgin materials	ktons	2,462
Material prepared for further recovery (excl. Energy recov)	Materials (paper, plastics, metals...) that have been processed by SUEZ (sorted, shredded, conditioned...) but still need further recovery before being considered secondary raw materials	ktons	1,620
Compost and organic fertilizers	Compost and materials prepared for direct land spreading, including wastewater sludge	ktons	1,559
Other material recovery (IBA, soils, solvents...)	Metals recovered from IBA, remediated soils, and regenerated solvents	ktons	903
Material for energy or alternative Fuels	Solid Recovery Fuels and Refuse-Derived Fuels	ktons	608
TOTAL OUTFLOWS		**KTONS**	**7,152**

Waste

For SUEZ, waste is defined as substances or objects generated during operations, processes, or in office activities that hold no monetary value or possess a negative value. These items are considered burdens and liabilities, requiring SUEZ to pay for their external recovery or disposal. The composition of waste generated by SUEZ consists of:

- Refusal Waste (Incoming Waste entrusted to SUEZ for treatment): materials rejected during waste treatment processes, either sent for recovery or disposal. These types of flows are not considered outflows for SUEZ, as they are process by-products. Composition: Terminal process waste, including cardboard, metal shards, and biological waste;
- Hazardous and Non-Hazardous Sludges, IBA, and Other Terminal Hazardous Waste (HW): these wastes are sent to landfills or incinerated based on regulatory and environmental considerations. These types of flows are not considered outflows for SUEZ, as they must be directed to elimination streams. Composition: Heterogeneous mixture of mineral and organic materials;
- Day-to-Day Operational Waste: waste generated from daily operations, sent to recovery or disposal streams. Composition: Broken machine parts, consumable packaging, soiled textiles, cables, etc.;
- Office Waste: non-operational waste generated in offices, sent to recovery or disposal streams. Composition: Biowaste, paper, cardboard, office supplies, etc.

SUEZ OWN WASTE INDICATORS (IN THOUSAND TONS)

Indicator	Total waste	Hazardous waste	Non-hazardous waste
TOTAL WASTE GENERATED	**2,318**	**238**	**2,079**
Total waste diverted from disposal	**31**	**7**	**24**
preparation for reuse	11	2	9
preparation for recycling	12	4	8
preparation for other recovery operations	8	2	6
Total waste directed to disposal	**2,287**	**231**	**2,055**
Incineration	821	37	784
Landfill	1,413	153	1,260
Other disposal operations	51	41	11
Non-recycled waste	**2,305**	**234**	**2,071**
Percentage of non-recycled waste	**99%[1]**	**98%**	**100%**

(1) All fluxes that are by-products of SUEZ processes and have recovery potential (e.g., IBA, non-hazardous wastewater, and drinking water sludges) and can be used to manufacture valuable products (composts, recovered metals…) are considered as "resources." As such, they are accounted for in the outflows metrics in accordance with CSRD definitions rather than classified as "waste."

The "% of non-recycled" KPI is naturally high, as it primarily consists of terminal waste that is difficult to recover and, by extension, challenging to recycle. A more relevant KPI for assessing SUEZ contribution to circularity in the waste business is the SUEZ Recovery Rate, which is presented in the first tab of the Targets and Metrics chapter of this ESRS.

6.2.4. Metrics Methodology regarding resource use and circular economy

Reporting perimeter coverage

The CSRD regulation aims to align financial and non-financial reporting scopes. To meet this requirement, every financial entity consolidated in the group's financial results must collect relevant non-financial data if deemed material. A site is considered material if its activities significantly impact the company's sustainability performance and revenue or if it is exposed to sustainability-related risks and opportunities.

This rule applies regardless of how long the entity operated during the reporting year. In previous sustainability reporting under the NFPS (Non-Financial Performance Statement), data integration was only required if the entity had been under SUEZ operational control for at least six months.

For this sustainability statement, all financial entities within SUEZ Business Units and Business Partners (such as support services, innovation, etc.) were assigned a dedicated environmental reporting entity or were included within a broader reporting structure. No entities were excluded based on scope parameters (financial consolidation, size, geography, activity, ...).

Metrics accounting rules

For ESRS E5, the accounting follows the Financial Control approach. This means:

- if an entity is fully financially consolidated, 100% of its metrics are included in SUEZ inventory;
- if an entity is part of a joint operation, only a proportion of the metrics is included, based on SUEZ share in the operation;
- if an entity is a joint venture or an associate, its metrics are not included in SUEZ inventory.

Based on its understanding of the available guidance, SUEZ elected to include third-party assets associated with contracts or sites it does not own as long as they are part of a consolidated entity. This includes third-party assets under:

- operation and maintenance (O&M) contracts;
- concession contracts, where SUEZ operates the asset but does not own it.

Definitions and data used

Measured tonnages

Since they represent key metrics of SUEZ core waste management activities, the total tonnages of waste entering and leaving SUEZ sites are measured daily using precise tools, such as weighbridges at the gates. These tonnages are then reported annually by business units to the Performance Direction through the Group's environmental reporting system for consolidation.

For water businesses, the primary inflows are water flows (e.g., raw water, wastewater). However, since these are accounted for in Chapter E3 – Water Resources, they are not included in this chapter.

The second most significant inflow consists of organic and mineral materials present in the water, which are treated during the process. These materials are accounted for based on the amount of sludge produced, measured using precise tools such as volumetric pumps.

The outflow tonnages (e.g., composted, digested, and limed sludge) are monitored using weight bridge measurements. Both inflow and outflow tonnages are reported and consolidated annually by the Group Performance Direction.

Estimated inflows

Chemical tonnages for water businesses are estimated using a spend approach and some internal studies focused on average prices by chemicals.

Technical and biological materials

Biological materials refer to material flows derived from biomass. These include plant-based products, biowaste, wastewater sludge, etc. (Packaging biowaste entering for deconditioning is included in this category due to its high organic material content).

Technical materials refer to all other types of waste and materials entering SUEZ for treatment or use that are not primarily composed of biological materials. These include mixed municipal waste (even if they contain biowaste), inert wastes (e.g., metals, cardboard, paper), and other non-organic wastes (e.g., solvents, medical waste, WEEE).

Flows type table

Business	Activity	Quantitative Inflows	Outflow	Waste
Recycling & Recovery	**LANDFILL HW & NHW**	Incoming waste: Municipal, C&I, HW...	Energy (electricity, heat, biomethane) ⩥ **see E1**	Leachate ⩥ **see E3**
	EFW HW & NHW	Incoming waste: Municipal, C&I, HW...	Energy (electricity, heat, biomethane) ⩥ **see E1** IBA recovered Metals (Ferrous, NF & Others)	APCR (REFIOM) IBA sent to landfills
	ORGANICS – COMPOSTING	Bio Waste	Compost Biofertilizers (organic, leachate)	Process refusals
	ORGANICS – AD	Bio Waste	Energy (electricity, heat, biomethane) ⩥ **see E1** Biofertilizers (organic leachate)	Process refusals
	MRF AND SPECIALIZED FLOW	Incoming waste: Municipal, C&I, HW... Incoming waste: pre-sorted	Materials prepared for further recovery: sorted, shredded, prepared, Wood Cupboards, paper Plastics Ferrous and Non Ferrous metals ... Raw secondary materials: Paper Pulp Plastics pellets Metals ready for recycling. SRF/RDF (UK excluded) ...	Process refusals
	WASTE COLLECTION	Nothing needed: no inflow	No product: no outflow	Residual waste
	HAZARDOUS WASTES	Hazardous wastes	Energy (electricity, heat, biomethane) Alternatives wastes Soil remediated. Recovered Solvents	IPCR (REFIOM) Leachates Refusals
Water	**DRINKING WATER PRODUCTION**	Raw water purchased or extracted ⩥ **see E3** Mineral and organic content contained into the entering raw water converted in sludge	Water produced ⩥ **see E3** DW sludge material recovered (incineration or compost or direct land spread)	DW sludge landfilled
	DRINKING WATER DISTRIBUTION	Drinking water put into the supply systems ⩥ **see E3**	Water distributed ⩥ **see E3** Potential network leaks ⩥ **see E3**	
	WASTE WATER COLLECTION	Wastewater collected ⩥ **see E3**	Wastewater delivered to wastewater treatment plant ⩥ **see E3** Potential network leaks ⩥ **see E3**	
	WASTE WATER TREATEMENT	Wastewater entering the WWTP ⩥ **see E3** Mineral and organic content contained into the entering wastewater converted in sludge	Water treated and discharged ⩥ **see E3** Water prepared for reuse ⩥ **see E3** Energy from sludge digestors ⩥ **see E1** WW Sludge or digestate recovered: incineration with energy recovery, compost or direct land spreading	WW sludge or digestate sent to landfill

Waste Business Recycling Recovery

The main KPI for SUEZ circularity is the Waste Business Recycling Recovery Rate.

This indicator specifically reflects waste management activities directly carried out by SUEZ and does not include waste that is merely collected or transferred to third parties for treatment.

This indicator is calculated by summing all the waste recovered by SUEZ through the following methods:

- Material Recovery: Transformation of waste to obtain raw secondary materials;
- Material for Energy Recovery: Transformation of waste to produce recovered or alternative fuels;
- Energy Recovery: Incineration with energy production and usage, or digestion to obtain biogas.

The total recovery is then divided by all the waste entering SUEZ facilities for treatment, excluding purely transferred tonnages, regardless of the treatment type (whether recycling or disposal, such as landfilling).

It excludes waste collected and/or transferred by SUEZ to third parties for treatment. However, this indicator is perfectible, as it does not account for the effort SUEZ makes in selecting appropriate treatment streams when sending collected or transferred waste to third parties.

7

APPLICATION OF THE EUROPEAN GREEN TAXONOMY

7.1. Context and consistency

7.1.1. Regulatory context

European Regulation 2020/852 of 18 June 2020, on the establishment of a framework to encourage sustainable investment, known as the "European Green Taxonomy" establishes a classification system for economic activities considered environmentally sustainable. That shared European Union frame of reference identifies economic activities that contribute to the European objective of carbon neutrality, i.e. "the Green Deal", and establishes a basis for comparison between companies. Ultimately, the aim of the European Green Taxonomy is to steer investment by public and private players towards activities that contribute to the transition to a more sustainable economy.

To that end, the regulation sets out six environmental objectives:

1. climate change mitigation;
2. climate change adaptation;
3. sustainable use and protection of water and marine resources;
4. transition to a circular economy;
5. pollution prevention and control;
6. protection and restoration of biodiversity and ecosystems.

The regulation, through its Delegated Acts, establishes scientific, ambitious, and transparent criteria for assessing an activity's contribution to one of the six objectives.

Two main concepts are identified to that end:

Eligibility

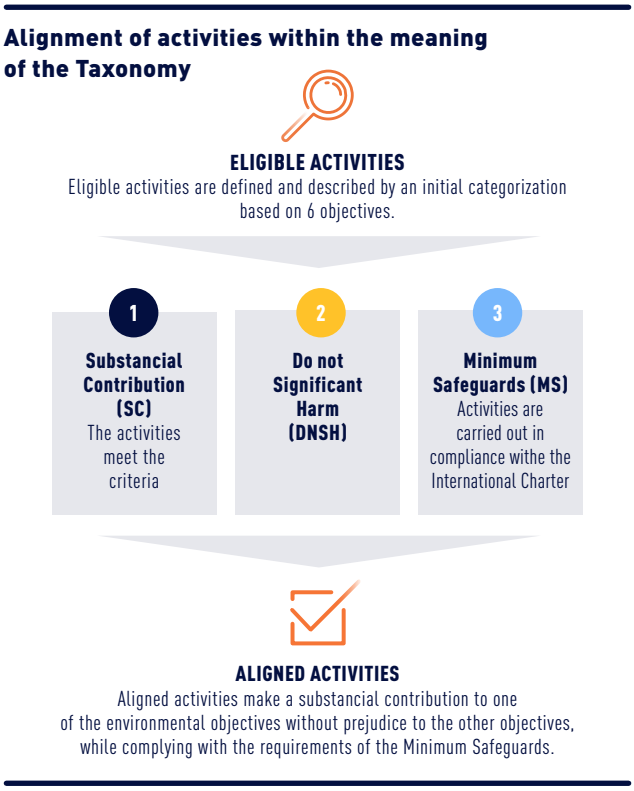
An eligible activity is one listed in the Delegated Acts as contributing to at least one of the six environmental objectives and for which technical criteria have been defined. To date, those are the "priority" activities with the greatest potential for contributing to environmental objectives. However, the Delegated Acts will be progressively updated and reinforced, with the aim of integrating more and more activities and strengthening the requirements.

In 2023, new eligible activities have been introduced by the amendments to the Climate Delegated Regulation (EU) 2023/2485 and the Taxonomy's Environmental Delegated Regulation (EU) 2023/2486 adopted by the EU Commission in November 2023.

As such, an activity eligible under the "climate mitigation" or "climate change adaptation" objectives in force is an activity listed in Annexes I and II of the Taxonomy's Climate Delegated Regulation (EU) 2021/2139, in Annexes I and II of the Taxonomy's Amended Climate Delegated Regulation (EU) 2022/1214 or in Annexes I and II of the Taxonomy's Amended Climate Delegated Regulation (EU) 2023/2485. An activity eligible under the "sustainable use and protection of water and marine resources", "transition to a circular economy", "pollution prevention and control" or "protection and restoration of biodiversity and ecosystems" objectives in force is an activity listed in Annexes I, II, III and IV of the Taxonomy's Environmental Delegated Regulation (EU) 2023/2486.

Alignment

An aligned activity is an eligible activity that makes a substantial contribution to an environmental objective according to the technical criteria set out for each environmental objective, that does not cause significant harm to other environmental objectives, and that complies with the minimum safeguards criteria.



Under Delegated Regulation (EU) 2021/2178 of 6 July 2021, stipulating details on the content and presentation of information to be published by companies [...] as well as the method to be followed to comply with that information obligation, companies are required to publish the share of their turnover, capital expenditure, and operating expenditure associated with their eligible and aligned activities.

In 2025, for the financial year 2024, the regulatory obligation to publish information is extended to the alignment of activities under the six objectives listed in both Climate and Environmental Delegated Regulations.

7.1.2. Link with SUEZ CSR strategy

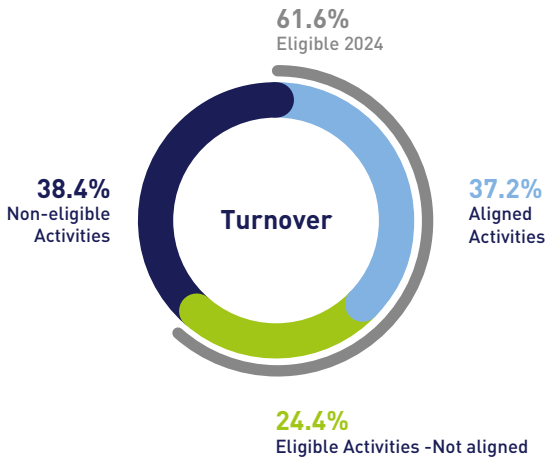
In January 2023, SUEZ published its new *Sustainable Development Roadmap 2023-2027*. This roadmap outlines ambitious goals for the six Climate and Environmental objectives of the EU Taxonomy. The Taxonomy will serve as a crucial steering tool for our non-financial performance.

Eligibility with the Taxonomy is now a criteria incorporated into project evaluations when they are submitted for approval by the Operations Committee. This Committee approves any project related to a new investment or a new or existing contract that exceeds the thresholds set out in the Group procedure. Some projects must also be approved by the SUEZ Board of Directors or a Board Committee. The procedure includes a risk grid, which encompasses environmental and social criteria, reviewed by the central Sustainable Development team.

7.2. Results of eligibility and alignment of SUEZ activities with the European Taxonomy

7.2.1. Turnover indicators

Summary of 2024 EU Taxonomy results



Turnover KPI summary	Turnover – €M	Turnover – %
A.1 Sustainable activities (aligned)	3,420	37.2%
A.2 Eligible non-sustainable activities (not aligned)	2,245	24.4%
Total (A.1 + A.2)	**5,665**	**61.6%**
B. Taxonomy-non-eligible activities	3,524	38.4%
TOTAL (A+B)	**9,189**	**100%**

In 2024:

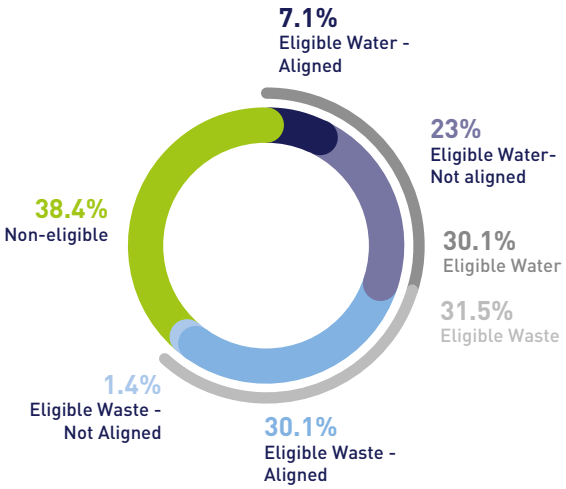
- 61.6% of the revenue is eligible;
- 37.2% of the revenue is aligned.

That eligible revenue primarily corresponds to the following activities:

- municipal water supply
  - production and distribution of drinking water,
  - wastewater collection and treatment;
- waste management
  - selective waste collection,
  - sorting and recycling,
  - biowaste: anaerobic digestion and composting,
  - landfill biogas recovery,
  - collection and transport of hazardous waste,
  - treatment of hazardous waste.

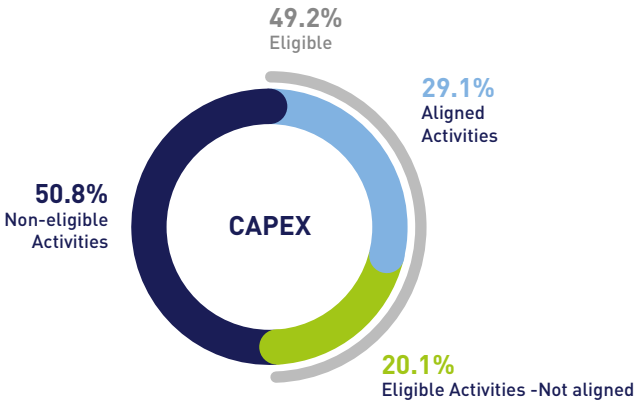
Similarly, SUEZ has conducted this third alignment reporting exercise with complete transparency and in strict adherence to the criteria outlined in the regulation. A conservative approach was adopted whenever arbitration was required on the interpretation of Susbtancial Contribution (SC) or Do No Significant Harm (DNSH) criteria. Details of these interpretations are provided in the methodological note (see ⩥ section *13.2.1 Methodology for applying the EU Taxonomy Regulation to SUEZ*). The Group may revisit these arbitrations in future reports, considering any future additions made by the commission or joint interpretations by the industry.

Revenue breakdown by activity - Eligibility by activity



7.2.2. CAPEX indicators

Summary of 2024 EU Taxonomy results



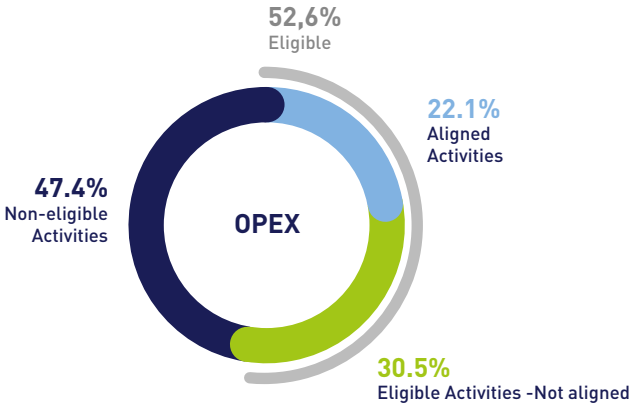
CAPEX KPI summary	CAPEX – €M	CAPEX – %
A.1 Sustainable activities (aligned)	226	29.1%
A.2 Eligible non-sustainable activities (not aligned)	156	20.1%
Total (A.1 + A.2)	**383**	**49.2%**
B. Taxonomy-non-eligible activities	394	50.8%
TOTAL (A+B)	**777**	**100%**

In 2024:

- 49.2% of CAPEX are eligible under the six objectives;
- 29.1% of CAPEX are aligned under the six objectives.

7.2.3. OPEX indicators

Summary of 2024 EU Taxonomy results



OPEX KPI summary	OPEX – €M	OPEX – %
A.1 Sustainable activities (aligned)	214	22.1%
A.2 Eligible non-sustainable activities (not aligned)	294	30.5%
Total (A.1 + A.2)	**508**	**52.6%**
B. Taxonomy-non-eligible activities	457	47.4%
TOTAL (A+B)	**965**	**100%**

In 2024:

- 52.6% of OPEX are eligible under the six objectives;
- 22.1% of OPEX are aligned with the six objectives.

7.2.4. Variations compared to the previous year

Compared to prior year, there is no main change related to the scope of the Group – no significative acquisition. The variation in linked to the business activity.

Other change mainly related to regulatory evolutions including:

- facilities that only sort waste but do not actually recover are also eligible.

7.3. Outlook and sustainable financing

The EU Taxonomy is a cornerstone of the EU's sustainable finance framework and an important market transparency tool. It will also be a key tool for guiding SUEZ strategic choices. For the financial year 2024, the analysis of eligibility and alignment with the European Taxonomy highlighted areas for improvement in future Taxonomy reporting exercises and provided strategic insights for the Company regarding its contribution to the environmental transition.

As a result, SUEZ has started and continues to implement over the next few years:

- raising awareness among internal stakeholders about the challenges of the Taxonomy;
- aligning with federations to share interpretations of regulations among players in the same sector, and to best reflect the spirit of the Taxonomy regulations.

In strong alignment and consistency with its *Sustainable Development Roadmap 2023-2027*, and keen to be an active player in sustainable finance, SUEZ also published in May 2022 its Green Bond Framework, aligned with the 2021 Green Bond Principles, which benefited from Sustainalytics' Second Party Opinion. The EU Taxonomy has been used as a relevant standard among others in the drafting of the framework. While the eligibility criteria are not strictly aligned with the Taxonomy, technical screening criteria have been used as much as possible when relevant. For sake of transparency, the mapping of Taxonomy eligibility has been done in the framework.

After issuing five Green Bonds in 2022, totaling €4.3 billion, SUEZ, rated Baa2 by Moody's, issued two more Green Bonds in 2023, amounting to €1.193 billion. The Green Bond report for these new issuances was published in 2024. Reflecting its ambition to become the trusted partner for circular solutions in water and waste, SUEZ reaffirms its commitment to sustainable financing with 94% of its financial debt being green.

8

OWN WORKFORCE (S1)

OWN WORKFORCE

Subtopic	Code	IRO	Type	SD Roadmap 2023-2027 Commitments
SUEZ, AN OPERATOR OF INDUSTRIAL EXCELLENCE				
Working conditions, equal treatment and opportunities for all	IRO-S1-1	An open and transparent social dialogue improves the relationship/trust between management and employees leading to better understanding & collaboration, thus promoting a positive and productive working environment.	I+	
	IRO-S1-4	SUEZ prioritises the Health and Safety of its employees by applying Group H&S standards in countries where regulations may be weak.	I+	
	IRO-S1-6	SUEZ implements a strong HSE and Human Rights policy for its employees (such as "Life Saving Rules", mandatory trainings, Speak Up & Stop, visual campaigns, Ethics Charter, etc.) leading to better protection of employees.	I+	
	IRO-S1-7	SUEZ provides training budgets, tools and monitors training and career management processes, allowing employees to develop new skills in order to better meet the Group's strategic orientations and increase competitiveness.	I+	Make Health & Safety our top priority each and every day Upskill our teams
	IRO-S1-3	A work accident linked to SUEZ activity may occur, with severe or fatal consequences for one or more employees, (such as presence of toxic gas or lack of oxygen in water networks, collision of machinery or vehicles with a pedestrian, fall of a load, fall from a height, risk of collapse of a trench, risk of fire or explosion, electrical risk, crushing of limbs in a high-risk machine that is not locked out).	I-	
	IRO-S1-5	The risk of increased costs due to changes in regulations requiring industrial sites to comply with Health & Safety measures (such as increasing the height of site safety barriers).	R	
	IRO-S1-2	Major loss event on a site (fire, explosion, extreme climatic event...).	R	

I+ Positive Impact I- Negative Impact R Risk O Opportunity

MATERIAL POLICIES

- Performance Review Process
- People Review Process
- Development Reviews Process
- Health, Safety & Environmental Risks (HSE) Policy
- Human Rights Policy

ACTIONS ON MATERIAL IMPACTS

- Regulatory training and "Health and Safety Leadership" programme for managers.
- Safety prevention talks and awareness campaigns.
- Action plans dedicated to Health, Safety and Environmental (HSE) Risks topics.
- Action plans to implement resulting from People and Development reviews, such as training, mentoring, tutoring, coaching, career interviews with HR, 360° reviews and building of new training programmes to meet needs.
- Use of Succession Plans resulting from People Reviews: a means to build career paths and to retain employees by offering employees the right job at the right time.

8.1. Strategy

8.1.1. Interests and views of stakeholders (ESRS 2 SBM-2)

SUEZ workforce strategy is embedded in the targets outlined in the *Sustainable Development Roadmap 2023-2027* and detailed in ⩥ section *1.2.2 Interests and views of stakeholders*. These targets primarily focus on:

- ensuring the Group's commitment to maintaining high-quality social dialogue with its stakeholders;
- ensuring the development and necessary training of its workforce;
- promoting the development of women in management positions;
- safeguarding all employees.

To achieve these objectives, SUEZ strategy is supported by various policies throughout different domains, including Human Rights and Health and Safety. The Company's *Health and Safety Policy* aims to achieve "zero severe or fatal accidents" as part of its *Sustainable Development Roadmap 2023-2027*. Further details can be found in ⩥ section *1.3.4 Sustainable Development Roadmap 2023-2027* of this Sustainability Statement.

8.1.2. Material impacts and risks and their interaction with strategy and business model (ESRS 2 SBM-3)

The Group's workforce includes various types of employees and non-employees, who are subject to material impacts.

Amongst its own employees:

- 89.2% are employed on permanent contracts;
- 6.6% on fixed term contracts;
- 2.9% on work experience contracts;
- 1.3% on integration contracts (specific employment contracts aimed at facilitating professional reintegration).

Amongst its non-employees, the Group employs an average full-time employment of 3,332 temporary workers, 135 work placement employees and 394 independent workers.

The Group pursues its various activities with the contribution of a wide range of expertise among its technical and managerial staff. In order to ensure skills match the Group's needs, SUEZ aims to maintain the key skills of its current activities (such as sales forces for the industrial sector, major project managers or mega-data experts) as well as to anticipate and develop those linked to its transformation into new activities such as smart cities or digital technology.

Addressing risks: child labour, or of forced or compulsory labour

Key concerns related to SUEZ workforce involve health and safety risks, discrimination, human rights violations, as well as the risks of child labour, forced labour, and human trafficking. According to SUEZ risk assessment, the majority of forced or compulsory labour risks are associated with subcontractors and suppliers operating within the upstream value chain, with a lesser extent involving on-site subcontractors. More specifically, these risks are primarily concentrated in waste management and construction activities. A more detailed analysis of these issues is provided in ⩥ section *1.3.2 Double materiality assessment results* of this Sustainability Statement.

Enhancing workforce well-being and safety

SUEZ actively works to eliminate discrimination and uphold human rights through:

- ongoing monitoring and compliance with safety regulations;
- targeted health and safety measures to mitigate major risks.

In 2024, SUEZ launched the **"Speak Up and Stop" campaign,** empowering employees and non-employees to challenge unsafe conditions and prevent workplace accidents. Additionally, the **"Vigiminute"** programme has been reinforced, ensuring that all individuals conduct a final safety check before starting work. This check is crucial for:

- reviewing work conditions;
- assessing protective measures;
- identifying necessary actions, especially for hazardous tasks or last-minute changes.

Creating positive workforce impacts

Beyond risk management, SUEZ implements initiatives that benefit employees, contractors, and partners. These efforts contribute to sustainable, positive impacts across all regions where SUEZ operates.

For further details, please refer to ⩥ section *1.3.2 Double materiality assessment results* of this Sustainability Statement.

8.2. Impact, risk and opportunity management

8.2.1. Policies regarding SUEZ workforce (S1-1)

SUEZ has developed several key policies and processes related to workforce to manage material impacts throughout its activities:

- the ***Health, Safety & Environmental Risks Policy,*** which focuses on mitigating major risks through comprehensive health and safety measures and a sustained commitment to these efforts. Updates to this policy are triggered by several factors, such as new H&S challenges or identified risks, causes of incidents, our H&S strategy or main changes to Group management team (IRO-S1-3, S1-4, S1-5 & S1-6);
- the **Annual HR Life Cycle,** which includes several key processes such as Performance & Development Reviews and People Reviews, to support the development and career progression of employees. These processes help identify skill development needs, organise appropriate training and create career plans (IRO-S1-7);
- the ***Group Human Rights Policy,*** which ensures compliance and aims to mitigate human rights impacts by fostering a culture of inclusion and equality while addressing labour and human rights risks, such as forced and child labour, and workplace safety while ensuring the protection of its employees. This policy involves an ongoing commitment. The *Human Rights Policy* may be revised in response to major regulatory changes and is generally updated every four years to align with SUEZ evolving environment (IRO-S1-7). Additionally, the Group disposes of an *Ethics Charter* further detailed under ⩥ section *11.1.2 Business conduct policies and corporate culture*;
- **Social Dialogue:** while the Group does not have a written social dialogue policy, social dialogue is deeply embedded within the organisation. It is carried out by the HR function, employee representatives, and trade unions. Numerous concrete examples of social dialogue initiatives are provided in the report.

The above policies and processes are an integral part to the broader *Sustainable Development Roadmap for 2023-2027*, reflecting the commitment of SUEZ to managing workforce-related impacts and promoting sustainable development. Additional details are provided in ⩥ the section *1.3.4 Sustainable Development Roadmap 2023-2027*.

Health, Safety & Environmental Risks (HSE) Policy

The *Health, Safety & Environmental Risks (HSE) Policy* of SUEZ addresses key health, safety, industrial and environmental risks, prioritising the safety of employees, contractors, and local communities.

This policy is overseen by the Executive and CSR Committees, providing continuous evaluation to meet the policy's objective of achieving "zero severe and fatal accidents". Employees are encouraged to report any violations to this policy through the SUEZ Ethics & Compliance network. Further details can be found in ⩥ section *11.1.2 Business conduct policies and corporate culture* of the present Sustainability Statement.

This policy is founded on three pillars:

1. **Commitment and Involvement of every employee:** ensuring the safety of all employees;
2. **a Fair Culture:** promoting a positive approach to HSE matters and creating a climate of trust, facilitating better feedback from the field and improved responses to potential hazards;
3. **Strong Mitigation of the Major Risks:** implementing mandatory standards, 10 Life Saving Rules and specific action plans to mitigate major risks.

Initiatives such as Safety Week, Fire Prevention Week and Health Week, alongside campaigns like "Speak Up and Stop" and the reinforcement of Life-Saving Rules, foster a proactive safety culture. These efforts enable SUEZ to further protect its employees and subcontractors across its value chain. By upholding high internal standards, SUEZ proactively anticipates regulatory changes, minimising compliance costs while ensuring the protection of its operations and workforce.

To ensure wide adoption of these policies, particularly by its workforce, SUEZ relies on its Communication Direction to disseminate information via various channels – posters, flyers, videos, webinars, etc. An annual HSE webinar for coordinators and supervisors provides an opportunity to communicate key objectives, events and available resources.

General details on the policy are provided in ⩥ section *1.3.3 Cross-cutting material Group policies*.

Career Development processes

SUEZ allocates training budgets, tools, and closely monitors training and career development processes, allowing employees to acquire new skills. This approach, overseen by the Senior Vice-President of Talent, is underpinned by two key pillars, which are discussed in the following sections.

Performance & Development Review Processes

Employees' development is a key driver of motivation and engagement within the Group, ensuring that employees at all levels of the organisation:

- **receive feedback and guidance** on their performance and areas for improvement. Employee performance is assessed annually during the *Performance Review Process*. This provides an opportunity for meaningful dialogue between managers and team members, allowing them to reflect on past achievements, evaluate performance levels and set objectives for the year ahead;
- **evaluate their career path** to develop a realistic and motivating career development plan. Usually performed during the annual Development Review, this process allows managers to have in-depth discussions with each team member. Employees can express their ambition for career growth within the Company, highlight their strengths and challenge their professional development project with their manager.

These two processes encompass three key stages, offering employees the opportunity to express themselves:

1. **Self-Review:** employees reflect on their experiences over the past year, assessing their performance, development needs, and future aspirations;
2. **Manager Review:** a structured discussion between the employee and their manager covering the topics addressed in the review. The manager appraises and provides constructive comments for the employees in his team;
3. **Final Validation:** employees have the opportunity to provide a final comment before the review is finalised.

People Review Process

The People Review Process follows a bottom-up approach and is coordinated across the Group. It offers the opportunity for managers and HR teams to discuss employee potential, share insights and enhance team staffing decisions. SUEZ implements People Reviews across both operational and functional lines for its executive staff. The *People Review Process* serves multiple purposes:

- **ensuring organisational continuity** by anticipating workforce needs and planning for key position successions;
- **addressing the aspirations of key talents** and expanding their development opportunities;
- **build an international, diverse and cohesive Group** by prioritising internal talents.

People Reviews offer a broader perspective on employee performance and potential, starting at the local level and expanding to a global organisational view. By analysing employees' performance and potential, managers and HR teams adopt a long-term approach to SUEZ human capital in relation to the Company's short, medium, and long-term business challenges.

Key outcomes of People Reviews:

- **developing personalised growth plans** that support employees' current roles while preparing them for future positions, assisting those facing difficulties and training them for critical future skills. Recommended development actions for managers include:
  - training & e-learning,
  - mentoring, tutoring, and coaching,
  - career interviews with HR,
  - site visits,
  - internal and external exposure (e.g., conferences, client interactions, Group projects),
  - enlarging the scope of responsibilities (e.g., leading a project, taking on a cross-functional mission),
  - short-term assignments in different Business Units or countries,
  - participation in professional networks,
  - knowledge transfer assignments,
  - international exposure,
  - 360° assessments...
- **defining succession plans for leadership continuity** – Participants in People Reviews are encouraged to think creatively and identify potential successors both within SUEZ and externally. While succession planning secures the organisation, it also plays a key role in shaping development plans and career paths for future leaders;
- **establishing collective action plans** to address challenges across various organisational levels;
- **identifying and tracking Talents and Experts for enhanced** visibility, development, retention and promotion opportunities:
  - employees are categorised into three talent groups:
    - Global Talents,
    - BU Talents,
    - Emerging Talents,

- a Development Center for Emerging Talents is already in place, with one for BU Talents under development, developing specific training programmes, digital coaching, 360° assessments, and is working on a mentoring programme,
- experts are classified as Lead Experts, Key Experts and Experts, with dedicated training focused on soft skills, including language learning.

The processes described above are aligned with SUEZ overall ambition in setting a framework to ensure talent development and succession planning. They are validated by the Senior Vice-President of Talent to ensure alignment with SUEZ strategic goals and commitment to building a strong, sustainable workforce.

SUEZ Human Rights Policy

The Group conducts regular **global and local risk assessments** to ensure compliance and mitigate human rights impacts, fostering a culture of inclusion and equality while addressing labour and human rights risks, such as forced labour, child labour, and workplace safety.

SUEZ is also committed to promoting diversity, inclusion and equal opportunities. Its **anti-discrimination policies** explicitly cover various grounds, including ethnicity, colour, gender, sexual orientation, gender identity, disability, age, religion, and social origin. The policy supports positive action for vulnerable groups, such as migrant workers and individuals with disabilities, through tailored programme and structured procedures to prevent and address discrimination while promoting inclusion. These measures are implemented via training, audits, and employee feedback mechanisms to ensure long-term impact and compliance with Union regulations and national laws.

SUEZ proactive approach also extends to health, safety and working conditions. The Company has comprehensive frameworks in place to minimise workplace accidents and safeguard employee well-being. Regular audits, performance monitoring, and managerial training reinforce this commitment, ensuring compliance and operational excellence while protecting the rights and dignity of all workforce members.

General details on the policy are provided in ⩥ section *1.3.3 Cross-cutting material Group policies*.

8.2.2. General processes for workforce engagement (S1-2)

Workforce engagement and integration in decision-making

At SUEZ, the perspectives of its workforce are essential in shaping decisions and activities, ensuring the effective management of both actual and potential impacts. Through a comprehensive strategy, SUEZ integrates employee feedback throughout its project lifecycle, utilising diverse engagement methods, including surveys, training sessions, panel discussions and consultations. For instance, during the development of its *Sustainable Development Roadmap 2023-2027*, employee representatives participated in dedicated ESG training sessions, live webcasts, and local steering committee meetings.

The Group's annual survey (Pulse), which engaged 40,000 employees in 2024, revealed strong interest in social and environmental issues, significantly influencing SUEZ strategic priorities. The Group intends to continue conducting this survey on an annual basis.

Employees play an active role in project management, ensuring their insights guide risk management strategies. This approach reinforces their involvement in shaping organisational initiatives.

Social dialogue (IRO-S1-1)

Social dialogue is a cornerstone of SUEZ workforce engagement approach, reaching a broad segment of employees through structured mechanisms. In 2023, 94.2% of employees across the Group were covered by social dialogue systems, with coverage increasing to 94.4% in 2024. Regular consultations, employee panels in various regions and internal working groups with employee representatives ensure inclusivity and diversity in decision-making.

Although the Group does not have a formal written policy on social dialogue, its culture is actively promoted by HR actions, employee representatives and trade unions. Several concrete examples of this approach are presented below.

Social dialogue enhances mutual understanding of issues, expectations and concerns among employees, their representatives and management. It not only helps address and resolve social issues but also contributes to internal cohesion and the overall performance of the organisation.

For years, SUEZ has promoted dynamic social dialogue at three levels: Europe, France and local (by legal entity). These three levels ensure effective and constructive social dialogue and that legal and local particularities are accounted for.

In 2024, social dialogue within SUEZ was marked by:

- **at European level:** Signing of an ambitious agreement on employee health and safety;
- **at Group level in France:** Signing a method agreement to negotiate a collective agreement on Quality of Life, Working Conditions and Professional Equality aimed at establishing quality guarantees for all Group employees in France, strengthening equality of treatment and fostering a sense of belonging to the same Group;
- **at the local level.** Examples include the following:
  - two collective agreements in an Italian subsidiary covering smart working and the 2025 vacations plan,
  - a collective agreement in a Tunisian subsidiary addressing wages, recruitments, working conditions, professional equality,
  - profit-sharing agreements in French entities.

Social dialogue is also illustrated by ongoing exchanges between management and employee representatives on various topics, including strategic decisions, economic and financial conditions, social policy and business line projects. These discussions occur at three levels:

- **European level:** The European Works Council, which is informed and consulted on Group-wide issues;
- **France:** The Group France Committee, which is kept informed about the Group's activities, financial status, employment trends and economic prospects;
- **local level:** Local representative bodies in several countries, such as social and economic committees in France and the Work Council in the UK. These bodies meet regularly and receive updates on the Company's operations and may also be consulted on specific projects.

Structured engagement activities

SUEZ is committed to maintaining continuous, direct dialogue with its workforce through various structured initiatives. These include:

- **surveys:** conducted annually to assess employee satisfaction and gather valuable feedback for workplace improvements;
- **meetings:** communication is maintained through quarterly management reviews, monthly team meetings, Direction briefings and biannual steering committees. Technical committees meet six to eight times per year to address project-specific issues;
- **reviews:** annual performance and development reviews, along with regular updates on the *Sustainable Development Roadmap 2023–2027* ensure alignment and dialogue across all business units and divisions;
- **additional engagements:** SUEZ also engages with its workforce through external consultations, live webcasts, and frequent local meetings, ensuring that strategic decisions take employee insights into account.

By combining these efforts, SUEZ reinforces its commitment to workforce engagement and the ongoing development of employee skills.

Leadership roles in workforce engagement

Key leadership roles ensure that workforce engagement is embedded in the organisation's processes. At the Group level, the Director of Human Resources and the Director Health and Safety, collaborate with the Director of Social Relations to facilitate dialogue, monitor social issues, and engage internal stakeholders, including the European Works Council.

Managers across the organisation play a vital role in fostering workforce engagement. While all employees are expected to align with the behaviours outlined in the Leadership Model (described below), managers are expected to exemplify these behaviours in their day-to-day work, especially in interactions with their teams.

The foundation of the SUEZ Leadership Model's core values and behaviours serve as a guide for collective success. It is designed to be a behavioural framework for all managers and employees, regardless of function, country or activity. The model is structured around four key pillars:

1. **shape the future:** encourages employees to envision a realistic future for SUEZ, placing customers at the heart of actions and promoting ecological transition and innovation;
2. **make it happen:** focuses on execution and results, fostering a culture of accountability and achievement;
3. **collaborate to elevate:** emphasises the power of teamwork and collaboration as the catalyst for extraordinary results;
4. **unleash the talent of our people:** highlights the importance of empowering and developing people.

Interaction at the local level is also essential for ensuring health and safety at the workplace. Specific roles, such as Health and Safety Officers and Plant Managers, ensure localised engagement and risks management. In most entities, the Plant Manager and Directors of Technical Management oversee employee consultations and technical validations in their respective units.

Human rights and ethical commitments

Respecting the human rights of workers is a core principle at SUEZ. As signatories of the United Nations Global Compact since June 2023, SUEZ fully commits to its ten principles, including the protection of human rights and labour standards. The Company ensures global consistency by adhering to international frameworks, such as the International Labour Organisation (ILO) Conventions, the OECD Guidelines for Multinational Enterprises and the European Directive on corporate sustainability due diligence.

Measuring effectiveness and continuous improvement

The effectiveness of workforce engagement is assessed through various mechanisms:

- **annual surveys:** SUEZ measures employee satisfaction through surveys on an annual basis. The 2024 survey, for example, achieved a 71% participation rate, with an engagement score 9 points higher than the benchmark average. Action plans, based on feedback from these surveys, are developed at both the Group and local levels to address identified areas for improvement;
- **key performance indicators (KPIs):** the Company tracks key performance indicators, such as the percentage of employees covered by social dialogue systems and the rate of trained employees. These metrics help monitor progress and inform adjustments to engage strategies;
- **health and safety initiatives:** SUEZ focuses on reducing accidents and improving workplace conditions. Audits and feedback systems assess the effectiveness of health and safety initiatives, ensuring continuous improvement in workplace safety.

Governance of resource allocation is overseen by the CSR Committee, which is composed of Board members. This Committee regularly reviews and evaluates policies to ensure that adequate resources are allocated to specific initiatives aimed at workforce engagement.

Current engagement practices and areas for improvement

While SUEZ has not yet implemented standardised processes across the Group for systematically engaging with the workforce, several initiatives ensure that employees are consistently informed and involved. These initiatives include consultations with external leaders, employee panels representing diverse profiles and geographies and dedicated ESG training sessions. Additionally, information sessions on new policies, live webcasts and local steering committee meetings provide essential platforms for communication and engagement.

Despite these efforts, establishing unified engagement processes at the Group level remains a challenge and a priority for SUEZ moving forward.

8.2.3. General processes for remediation and channels to raise concerns (S1-3)

SUEZ adopts a comprehensive and structured approach to addressing complaints, providing remedies and ensuring the well-being of its workforce. This commitment is upheld through robust reporting mechanisms, systematic processes and continuous improvement initiatives.

Incident reporting and remedial actions

SUEZ has implemented a range of measures to manage and address significant negative material impacts on its workforce (IRO-S1-3). These include:

- incident reporting and analysis;
- corrective action plans: development and implementation of targeted solutions to prevent recurrence;
- proactive training: regular training programmes aimed at mitigating future risks.

For severe cases, incidents are thoroughly analysed, considering technical, human and organisational factors. Remedial actions encompass financial compensation, medical assistance, procedural changes and additional training.

Specific policies, such as the Health, Safety and Environmental Risks Policies, ensure incidents are promptly documented and communicated. These efforts are supported by continuous training sessions, such as the dissemination of the *Ethics Charter*, which guides employees on ethical practices and reporting concerns.

Channels for reporting and raising concerns

SUEZ provides multiple confidential channels for employees to raise concerns or grievances, including:

- **synergie tool:** used by French entities for reporting incidents. Almost all entities have such a tool available for their scope (IRO-S1-2);
- **structured feedback sessions:** conducted during performance reviews, as well as held directly with line managers or the Human Resources team.

Other mechanisms include:

- **Ethics and Compliance networks:** includes dedicated email addresses for reporting breaches, as described in ⩥ section *11.1.2 Business conduct policies and corporate culture*;
- **European Works Council and Executive Committee meetings:** platforms for engaging in open discussions with senior management;
- **Legal Direction mechanisms:** dedicated grievance-handling processes for health, safety and environmental issues.

These channels ensure confidentiality, protection against retaliation and timely follow-up. Awareness campaigns, training sessions and workshops further reinforce employee trust in these mechanisms.

Additionally, SUEZ has established a **Harassment Investigation process,** currently implemented in France and the UK and which will be extended to all European countries. This process, while adapted to each country, maintains consistent procedural guarantees, ensuring equal rights for all European employees. Key principles include:

- investigations are led by the HR team (except in specific cases);
- a preliminary interview to be held before the investigation (except in particular cases);
- investigations are to be conducted with discretion, confidentiality, neutrality and impartiality;
- harassment cases are only formally recognised upon completion of the investigation.

Monitoring and ensuring effectiveness

SUEZ continuously monitors workforce concerns through tools like the Synergie system, employee surveys, systematic exchanges with business units, and independent audits conducted by a global network of around a hundred Human Resource managers. These audits verify data during quarterly reporting campaigns and ensure that insights are turned into actionable plans at various organisational levels. Local HR managers are responsible for overseeing the implementation of these plans.

To ensure reporting mechanisms remain effective, SUEZ leverages:

- **Corrective Action Plan reports:** addressing non-HSE compliance incidents;
- **Flash reports:** review of fatal and severe accidents by the Health and Safety team;
- **CSR Committee Reviews:** evaluating alignment between resources and sustainability targets.

The results of these processes are shared transparently across the organisation, fostering a trust-driven reporting culture. In 2024 alone SUEZ analysed over 1,661 high-severity potential events, highlighting the maturity of the safety culture.

Commitment to continuous improvement

SUEZ highlights its commitment to promoting human rights and ensuring duty of care. These efforts are enhanced through the publication of its Vigilance Plan, which outlines measures to protect vulnerable groups. ⩥ See section *9.2.1 Policies regarding communities* for more details.

Training, reporting mechanisms and governance practices continue to evolve, ensuring alignment with sustainability and regulatory requirements. This ongoing commitment ensures that workforce concerns are addressed promptly and effectively, fostering a workplace culture centred on transparency, inclusivity and well-being.

Employee awareness and trust in concern-raising mechanisms

SUEZ is committed to ensuring that employees are aware of and trust the mechanisms in place for raising concerns or needs. This is achieved through structured communication, training and transparent policies.

Engagement initiatives include:

- **forums for employee's representation:** SUEZ actively involves employee representatives through discussions at the European Works Council, Executive Committee and Board of Directors' CSR Committee;
- **the development and execution of the *Sustainable Development Roadmap 2023-2027*:** this roadmap is communicated to employees through live webcasts and follow-up sessions at Business Unit steering committees, ensuring clear and accessible communication across SUEZ;
- **dedicated ESG training programmes:** these programmes strengthen employee representatives' understanding of key sustainability topics;
- **pulse surveys:** these surveys offer valuable insights into employee satisfaction and engagement. The participation rate has increased from 63% in 2023 to 71% this year, while the engagement rate has grown from 66% to 67%. Furthermore, employee engagement in social and environmental issues has increased from 73% to 74% this year.

Key policies, including the *Ethics Charter* and *Health, Safety and Environmental Risks Policy* are available both online and on-site, ensuring all employees can easily access them. These policies emphasise transparency and promote a Fair Culture approach, encouraging employees to report unsafe conditions or ethical breaches without fear of retaliation. Dedicated reporting channels include:

- dedicated Ethics & Compliance Email addresses for reporting issues;
- access to the internal Ethics & Compliance network, line managers or the HR network;
- Training Sessions and development programmes to enhance understanding of these mechanisms by employees.

Regular audits are conducted to evaluate the effectiveness of these processes and feedback channels are continuously refined to maintain employee trust and participation.

Anti-retaliation policies and protections

The *Practical Guide to Ethics* and the Group *Policy on Whistleblowing and Processing of alerts* explicitly prohibits retaliation, ensuring confidentiality and protecting employees from negative consequences when reporting issues. This is reinforced by a whistleblowing system, managed by the Direction, that provides a safe avenue for raising concerns about ethics and compliance. See section *11.1.2 Business conduct policies and corporate culture* for further detail.

Expansion of concern-raising mechanisms

SUEZ is currently deploying the "Speak Up & Stop" culture, empowering each employee to raise concerns through any available channel, without fear of retaliation. Health & Safety concerns can be reported to colleagues, immediate supervisors or to the Human Resources Direction. This initiative strengthens transparency and trust. It also ensures that all employees know they have the power and even the duty, to speak up in the case they witness a dangerous situation.

8.2.4 Taking action on SUEZ workforce (S1-4)

SUEZ has established a comprehensive framework to prevent and mitigate significant negative material impacts on its workforce, focusing on health, safety and professional development.

Proactive initiatives and governance measures (IRO-S1-3 & S1-6)*/short term*

Internal initiatives, such as communication and awareness campaigns such as "Speak Up & Stop", Toolbox Talks prevention sessions and three weeks awareness campaigns, foster a proactive safety culture. A **toolbox talk** is a short safety meeting or discussion held in a workplace. These allow for open dialogue among workers to raise safety issues, share experiences, and reinforce safety efforts to prevent accidents or injuries. It is also an important occasion for people to take commitment to change behaviors. Continuous sharing of lessons learned from accidents and best practices further reinforce this approach. In addition, regulatory training such as the "Health and Safety Leadership" programme for managers, is regularly conducted to enhance leadership capabilities, specifically for the Health & Safety topics.

As part of its ongoing commitment to strengthening safety culture and risk prevention, SUEZ has implemented **Managerial Safety Visits** (MSV). Conducted on-site by senior managers (Excom and Excom N-1), these visits foster dialogue between leadership and frontline teams. They provide an opportunity to identify best practices, proactively address potential risks, and implement targeted improvement actions. In 2024, a total of 5,990 MSV were conducted, an increase of 50.2% compared to 3,989 in 2023. The number of MSV is monitored quarterly, with targets set for each Business Unit by the Group's Health & Safety Direction to ensure a structured and ongoing commitment. Relevant metrics can be found in » section *7.3.6 Health and Safety metrics*.

To address actual material impacts, SUEZ has implemented targeted actions supported by robust governance mechanisms. For Health & Safety topics, the HSE Direction oversees remedial action plans, which are reviewed by the steering committee and the CSR Committee. In 2024, over 1,661 high-severity potential events and 25 severe accidents were reported and analysed, ensuring appropriate responses to severe incidents. For mental health concerns, employees in France have access to a dedicated hotline to address issues such as harassment or discrimination.

Positive workforce initiatives (IRO-S1-7 & S1-4)*/short and medium term*

SUEZ invests in numerous initiatives aimed at delivering positive impacts for employees. These include structured career development programmes, such as coaching, while annual Development Reviews help identify training needs in line with employees career aspirations and organisational goals.

Today, over 35,000 employees (86% of SUEZ workforce) are deployed in the HRIS tool, giving them access to a rich training catalogue. This catalogue offers a wide range of on-the-shelve digital trainings modules, which can be accessed and launched by the employees themselves or assigned by their manager or HR manager. In addition, compliance trainings are regularly assigned to all Group employees, covering key subjects, such as Cybersecurity, Ethics and GDPR. An onboarding training course is also provided to new employees, allowing them to discover the Group's activities and organisation and making them aware of compliance subjects.

Developing digital skills is a key priority for SUEZ, in response to the transformation and industrialisation of its processes and activities, as well as the emergence of new markets (impacting all SUEZ professions in all activities). The Group is committed to assisting employees in adapting to digitalisation through specific training programmes tailored to evolving job requirements and skills.

SUEZ also places significant emphasis on Health & Safety, with ongoing training programmes addressing emerging regulatory changes and fostering a Safety Culture. Psychological well-being is also supported through stress management workshops and other initiatives to enhance resilience and mental health.

In 2024, 79.5% of SUEZ employees benefited from training, almost in line with the *Sustainable Development Roadmap 2023-2027*, where the Group's target is to achieve a rate of 80% by 2027.

Employee engagement is further encouraged through internal surveys and volunteering opportunities, formalised under the *Solidarity Commitment Charter*. This initiative allows employees to contribute to societal causes, strengthening their sense of belonging.

Tracking and assessing the effectiveness of actions (IRO-S1-2 & S1-3)*/short and medium term*

SUEZ closely monitors and reports on workplace incidents, including severe and non-severe accidents, high-potential near-misses, fire outbreaks, lost days, work-related illness and deaths. For significant incidents, severe accidents and deaths, reports are produced, corrective action plans are reviewed, and communication flashes are shared within the Group.

In addition, metrics from Health & Safety training programmes are reported annually. The use of local technological tools enhances global reporting capabilities, enabling the Company to monitor and analyse environmental and operational risks more effectively.

By integrating these mechanisms, SUEZ ensures that workforce-related initiatives are continuously refined and aligned with strategic priorities, reinforcing its commitment to employee well-being and organisational excellence.

Actions to mitigate significant risks and monitor effectiveness (IRO-S1-5 & S1-6)*/ short and medium term*

To mitigate significant risks arising from impacts and dependencies on the workforce, SUEZ has implemented a robust framework of standards, self-evaluations and compliance measures. At the core of this framework are the HSE Standards, which provide comprehensive methodologies for protecting workers and installations against various major risks. These standards ensure that the mandatory protection and prevention actions are consistently applied across all sites and operations, minimising exposure to potential hazards.

To assess and manage industrial and environmental risks, the Company uses the IRM self-evaluation tool. This tool enables entities to systematically evaluate their risk management performance, identify gaps and develop targeted action plans. These evaluations are tailored to address both organisational and local needs, ensuring alignment with site-specific challenges and regulatory requirements.

Furthermore, SUEZ implements regulatory compliance action plans at both BU and operational sub-entities levels, to meet regulatory standards, and ensuring adherence to evolving legislation. Progress is monitored through periodic reviews, allowing for necessary adjustments to enhance risk mitigation efforts.

Effectiveness is tracked through a combination of regular self-assessments, internal audits and performance monitoring. We ensure that these measures are effectively implemented through:

- regular internal audits carried out by the BUs and by head office over a 3-year cycle in all operations. A team of two experienced auditors, including at least one from the head office team, comes to audit an entity over five days: the first day with management and cross-functional staff, three days of on-site operational audit, one day for closing. Each audit is the subject of a report that is distributed to the entity and to the Group's Executive Committee;
- self-assessment of the 200 requirements for controlling industrial and environmental risks. This self-assessment is carried out using the Group's IRM tool, which is shared between the HSE Direction and the Insurance Direction;
- the monitoring of leading and lagging indicators to track the proper deployment of managerial practices, as well as the events that occur in the entities.

This approach ensures that measures remain relevant and effective in addressing workforce-related risks, safeguarding both the organisation and its employees. For instance, chemical risks are closely monitored, as new regulations often require costly adaptations, such as the substitution of hazardous substances or investment in advanced safety equipment to ensure compliance and safety.

Management of major loss events and risk mitigation (IRO-S1-2)*/short and medium term*

Major loss events, such as severe injuries, fires, explosions, collapse of structure and pollution, etc. pose significant risks to human life, the environment, operation or organisational assets. In the event of an incident, SUEZ follows a clear protocol, and teams are trained to respond effectively. SUEZ incident reporting and management procedure outlines the steps for reporting, analysis, and following up on incidents, based on their type and severity. For example, HiPo Incidents refer to dangerous situations or near misses that could potentially lead to severe accidents. These incidents must be reported within 24 hours if rated at levels 4 or 5, followed by a flash alert within three weeks. The analysis involves all relevant stakeholders, including victims, supervisors and witnesses, to identify the root causes. A quarterly report is then prepared, with structured follow-up actions aimed at ensuring continuous improvement. For more severe accidents, an immediate investigation is initiated, and a preliminary report and a flash alert are submitted within three weeks. A comprehensive report is then generated following further investigation.

8.3. Metrics and targets

8.3.1. Targets regarding SUEZ workforce (S1-5)

Key Commitments and Objectives	Link to IRO	Target Deadline	Scope	Reference year and Baseline	Yearly results	Methodology
Upskill our teams	SUEZ provides training budgets, tools and monitors the training and career management process, allowing employees to develop new skills	80% by 2027	Own employees	2021: 72.2% (corrected values)	2023: 77.4% 2024: 79.5%	Percentage of people trained in the workforce per year [1]
Enforce basic rights among our value chain	An open and transparent social dialogue improves the relationship/ trust between management and employees leading to better understanding & collaboration, thus promoting a positive and productive working environment	>92% by 2027*	Own employees	2021: 93.5% (corrected values)	2023: 94.1% 2024: 94.3%	Percentage of FTEs covered by a social dialogue mechanism [2]
Make Health & Safety our top priority each and every day	SUEZ implements a strong *HSE and Human Rights Policy* for its employees (such as "Life Saving Rules", mandatory trainings, Speak Up & Stop, visual campaigns, *Ethics Charter*, etc.) leading to better protection of employees & subcontractors	<5.30 by 2027	Own employees	2021: 6.73	2023:5.97 2024: 5.58	Frequency rate [3]
		<0.39 by 2027	Own employees	2021: 0.51	2023:0.46 2024: 0.46	Severity rate [4]

* *Please note that even though this target was reached as from 2021, continued efforts are in place in order to maintain or increase this level of coverage, despite the different scope effects that the Group is undertaking.*

(1) % of people trained in the workforce per year = ***[Number of employees trained within the year]/[Number of average employees]***

Number of employees who took part in at least one training course during the year (face-to face and digital training).

Employees scope *includes SUEZ employees with permanent contracts + fixed term contract and employees with work experience contracts. These exclude non employees (such as interns, independent workers, temporary workers from a temporary agency).*

(2) % of FTE covered by a social dialogue mechanism = ***[Number of FTEs covered by a social dialogue mechanism]/[Number of FTEs]***

FTE *includes SUEZ employees with permanent contracts + fixed term contract and employees with work experience contracts. These exclude non-employees (such as interns, independent workers, temporary workers from a temporary agency).*

Social Dialogue Mechanism = *Includes all types of negotiation, consultation or simply exchange of information between or among representatives of governments, employers, their organisations and workers' representatives, on issues of common interest relating to economic and social policy. It can exist as a tripartite process, with the government as an official party to the dialogue or it may consist of bipartite relations only between workers' representatives and management.*

(3) Frequency rate = ***[Number of occupational accidents with lost time + number of fatal occupational accidents)/Total Hours Worked] x 1,000,000***

Frequency rate *= Number of occupational accidents entailing the loss of at least one day and number of fatal occupational accidents occurring during the considered period multiplied by one million, divided by the number of hours worked in the considered period.*

This indicator is tracked for:

- *Group staff;*
- *temporary staff working according to the instructions of a Group subsidiary;*
- *contractors.*

Workplace incidents *= Any accident that suddenly happens due to or on the occasion of work, resulting in bodily lesions, psychological trauma or illness. Only work accidents resulting in the inability to work for at least 1 day are counted. Accidents during travel for professional reasons are work accidents. Accidents between home and the workplace are not counted as work accidents.*

Hours worked *= The total hours actually worked by the persons belonging to the active headcount during the period in question, including overtime and any hours spent performing custodial duties. Hours of training are not counted. Leave must not be counted.*

Employees scope *includes SUEZ employees with non-temporary contracts (CDI) + temporary contracts (CDD, alternance) and exclude Interns, interims, subcontractors.*

(4) Severity rate = ***[Total Days Lost/Total Hours Worked] x 1,000***

Severity rate *= Number of lost days as a result of an occupational accident (including relapses of accident) multiplied by one thousand, divided by the number of hours worked of the considered period. The number of lost days counts the number of days lost in the year N, consecutive* ***to occupational accidents that occurred during previous years to the considered year and lost days in the year following occupational accidents that occurred in the considered period.***

Days lost *= the number of calendar days lost due to occupational accidents involving staff that occurred in the considered year, with the exception of the day on which the occupational accident took place.*

Employees scope *includes SUEZ employees with non-temporary contracts (CDI) + temporary contracts (CDD, alternance) and exclude Interns, interims, subcontractors.*

To note that the risk of increased costs due to regulatory changes requiring industrial sites to comply with Health & Safety measures (such as increasing the height of site safety barriers) is not associated with a specific KPI. If such a change were to occur, SUEZ would assess the related costs at that time. However, if no such changes take place, there is no need for an indicator to track this risk.

The occurrence of a major loss event at a site, such as a fire, explosion, or extreme climatic event, is already monitored through our EIR (environmental and industrial severe events indicator). The Group's objective is zero severe accidents, and the indicator is not yet reliable enough to be published this year.

Targets are set through a meticulous process, including a review of stakeholder expectations, close dialogue with subsidiaries for their medium-term plans and input from various committees. The Executive Committee and the CSR Committee review these targets prior to final approval by the full Board, ensuring their involvement in setting the targets. These are then presented before the European Works Council. A more detailed description of the definition and monitoring process of the *Sustainable Development Roadmap* targets and of how progresses towards the objectives are shared to employees is provided in ⩥ section *1.3.4 Sustainable Development Roadmap 2023-2027*.

8.3.2. Characteristics of SUEZ employees (S1-6)

Procedure/methodology for collecting and consolidating social data

The SUEZ social reporting network, comprised of around one hundred local HR contacts throughout the Group, transmits various social indicators via a unified tool, adhering to clearly defined procedures and definitions.

Internal control of this data is ensured via the following measures:

- **automatic checks:** the data entry packages include several automatic checks, that enable SUEZ local contacts to ensure the accuracy and consistency of the information entered. Comments can also be included within the reporting packages to explain significant variations or specific situations;
- **subsidiary-level controls:** the main subsidiaries perform consistency checks on the data of their respective entities;
- **central-level controls:** the central team conducts consistency checks on all companies within the Group for which there are more than three employees (such as monitoring evolutions, ensuring explanations for significant variations are obtained and making sure corrections are performed when necessary).

Workforce overview

At the end of 2024, SUEZ own workforce totals 41,226 employees, of which 31,753 are male and 9,473 are female. The following tables provide a breakdown of employees by gender, country and contract type, based on the end of period headcount.

EMPLOYEE HEADCOUNT BY GENDER (at end of reporting period)

Gender	12/2024
Male	31,753
Female	9,473
TOTAL EMPLOYEES	**41,226**

Excluded from the table: other + not reported (non-material for SUEZ).

EMPLOYEE HEADCOUNT IN COUNTRIES WITH >50 EMPLOYEES REPRESENTING AT LEAST 10% OF TOTAL NUMBER OF EMPLOYEES (end of reporting period)

Country	12/2024
France	24,937
United Kingdom	6,899

EMPLOYEE HEADCOUNT BY TYPE OF CONTRACT AND GENDER & DISCLOSURE OF NUMBER OF FULL AND PART TIME EMPLOYEES (end of reporting period and average)

12/2024	Female	Male	Total
Number of employees (end of period)	9,473	31,753	41,226
Average number of employees	9,378	31,165	40,544
Number of permanent employees (end of period)	8,380	28,399	36,779
Number of fixed term employees (end of period)	642	2,602	3,244
Number of full-time employees (end of period)	8,720	31,288	40,008
Number of part-time employees (end of period)	753	465	1,218

Excluded from the table:

- *other + not reported (non-material for SUEZ);*
- *Number of non-guaranteed hours employees (head count/FTE) => not significant for SUEZ (0.1% of the workforce).*

END OF PERIOD/AVERAGE HEADCOUNT BY CONTRACT TYPE, FULL-TIME AND PART-TIME EMPLOYEES, BROKEN DOWN BY REGION

12/2024	France (mainland and overseas)	Europe (excl. France)	North America	South America	Africa/ Middle East	Asia/ Oceania	Total
Number of employees	24,937	9,200	27	157	4,156	2,749	41,226
Average number of employees	24,626	9,036	45	275	3,778	2,784	40,544
Number of permanent employees	23,085	8,768	26	157	2,605	2,138	36,779
Number of fixed term employees	807	343	1	0	1,482	611	3,244
Number of full-time employees	24,136	8,808	23	157	4,154	2,730	40,008
Number of part-time employees	801	392	4	0	2	19	1,218

Excluded from the table: number of non-guaranteed hours employees (head count/FTE) => not significant for SUEZ (0.1% of the workforce).

EMPLOYEE DEPARTURES AND TURNOVER RATE BASED ON EMPLOYEES ON PERMANENT CONTRACTS & FIXED-TERM CONTRACTS (including Work experience contracts)

	12/2024
Resignation	2,023
Dismissal	1,079
Retirement	532
Death in service	0
Turnover rate*	9.0%

* *Turnover rate calculation: (resignations + dismissals + retirements + death in service)/average headcount of the period.*

8.3.3. Characteristics of SUEZ non-employees (S1-7)

Concerning non-employees, SUEZ is disclosing the number FTE interns, temporary non-employee workers (temporary agencies) and Independent workers, as these categories reflect relevant aspects of the workforce structure of SUEZ.

	12/2024
Temporary non-employees (average FTE)	3,332
Interns (average FTE)	135
Independent workers (average FTE)	394

8.3.4. Collective bargaining coverage and social dialogue (S1-8)

As mentioned under 7.2.2. "General processes for workforce engagement", 94.4% of SUEZ employees are covered by a social dialogue system in 2024

The table below presents information on workplace representation within the European Economic Area (EEA). It includes data from countries where SUEZ employs more than 50 people and where these employees represent over 10% of the Company's total workforce. This threshold ensures the analysis is concentrated on countries with a significant employee presence. Within the EU, only France falls into these criteria, representing 60.5% of the workforce. 100% of them have benefited from workplace representation.

Employees covered by an employee representative institutions	**Social dialogue**
Coverage Rate	*Workplace representation (EEA only)* *(for countries with >50 employees representing >10% total employees)*
0 – 19%	
20 – 39%	
40 – 59%	
60 – 79%	
80 – 100%	France (100%)

Please, note that data on collective agreements is not available for 2024.

As explained in paragraph 7.2.2 "General processes for workforce engagement", SUEZ has a European Works Council. This Committee represents all employees working for SUEZ companies in Europe. In addition to this representation, social dialogue also exists at different levels (see *7.2.2 General processes for workforce engagement*).

Furthermore, almost all employees in France (more than 20,000 employees) are covered by collective agreements. On an international level, SUEZ also implements measures to report and monitor this information.

8.3.5. Training and competency development metrics (S1-13)

As part of its commitment to upskilling its workforce, SUEZ prioritises providing employees with the necessary training to support their continuous professional development. As detailed in ⩥ sections *7.2.1 Policies regarding SUEZ workforce* and *7.2.2 General processes for workforce engagement*, which outlines relevant policies, actions & initiatives as well as regular reviews serve as key mechanisms for identifying training needs.

Amongst the metrics we follow, the following can be outlined:

PERFORMANCE AND CAREER DEVELOPMENT

12/2024	% Female	% Male	% Total
Percentage of employees that participated in regular performance and career development reviews*	80%	57%	63%

* *Divided by the average personnel.*

TRAINING HOURS PER EMPLOYEE AND BY GENDER

12/2024	Female	Male	Total
Average number of training hours* per employees (end of period)	13.6	15.0	14.7
Average number of training hours* per average employees	13.7	15.3	15.0
Average number of training hours* per employees trained	15.9	19.8	18.8

* *Includes all types of training (Instructor Lead training & Digital training).*

8.3.6. Health and safety metrics (S1-14)

SUEZ places the Health and Safety of its employees at the forefront, with strong policies and actions, as described in ⋙ sections *7.2.1 Policies regarding SUEZ workforce*. These policies and actions can be monitored through the following indicators, alongside the targets detailed in ⋙ section *7.3.1 Targets regarding SUEZ workforce*.

Category	Description	2024 reported values
Workforce covered by health and safety management system	Percentage of the workforce covered by health and safety management systems based on legal requirements and/or recognised standards or guidelines.	100%
Work-related fatalities *(own workforce)*	Total number of fatalities in the workforce as a result of work-related injuries and work-related ill health.	0
Work-related fatalities *(non-employees)*	Number of fatalities among non-employees working on the undertaking's sites due to work-related injuries and ill health.	1
Recordable work-related accidents *(own workforce)*	Total number of recordable work-related accidents in the undertaking's workforce.	370
Recordable work-related accidents *(non-employees)*	Total number of recordable work-related accidents – non-SUEZ employees.	24
Frequency Rate	Rate of recordable work-related accidents relative to the worked hours of people in its own workforce	5.58
Recordable work-related ill health *(own workforce)*	Number of cases of recordable work-related ill health among employees.	9
Days lost *(own workforce)*	the number of calendar days lost due to occupational accidents involving staff that occurred in the considered year, with the exception of the day on which the occupational accident took place.	30,607
Severity Rate*		0.46

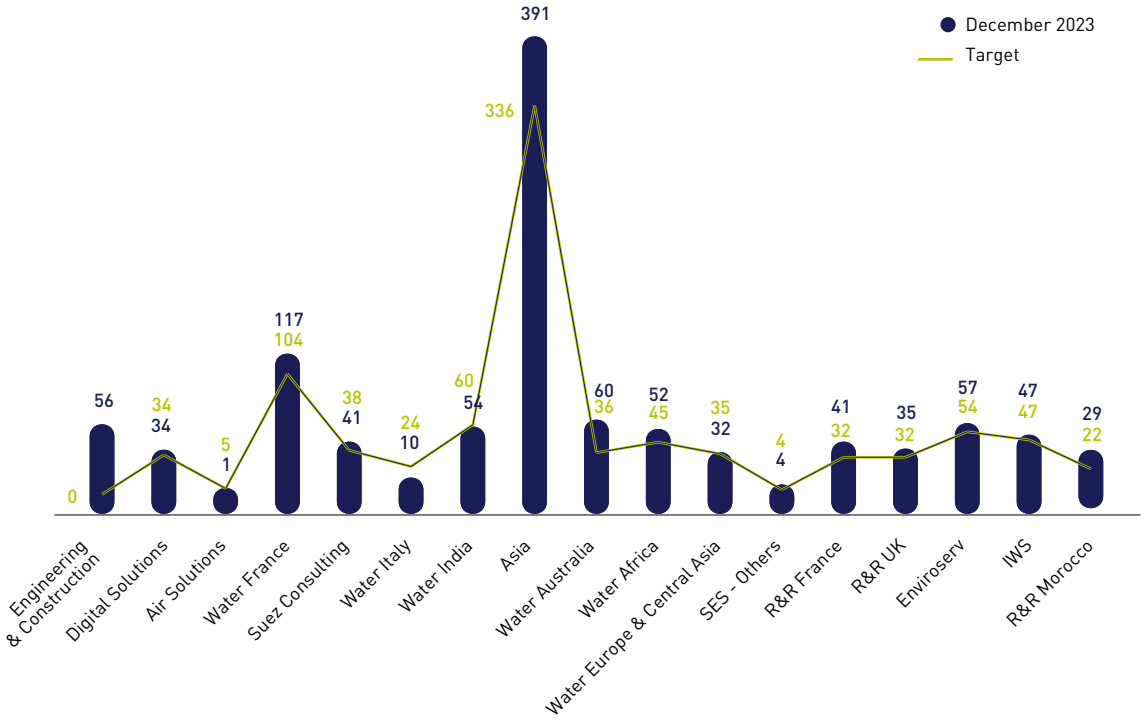
**Severity rate = [Total Days Lost/Total Hours Worked] x 1,000*

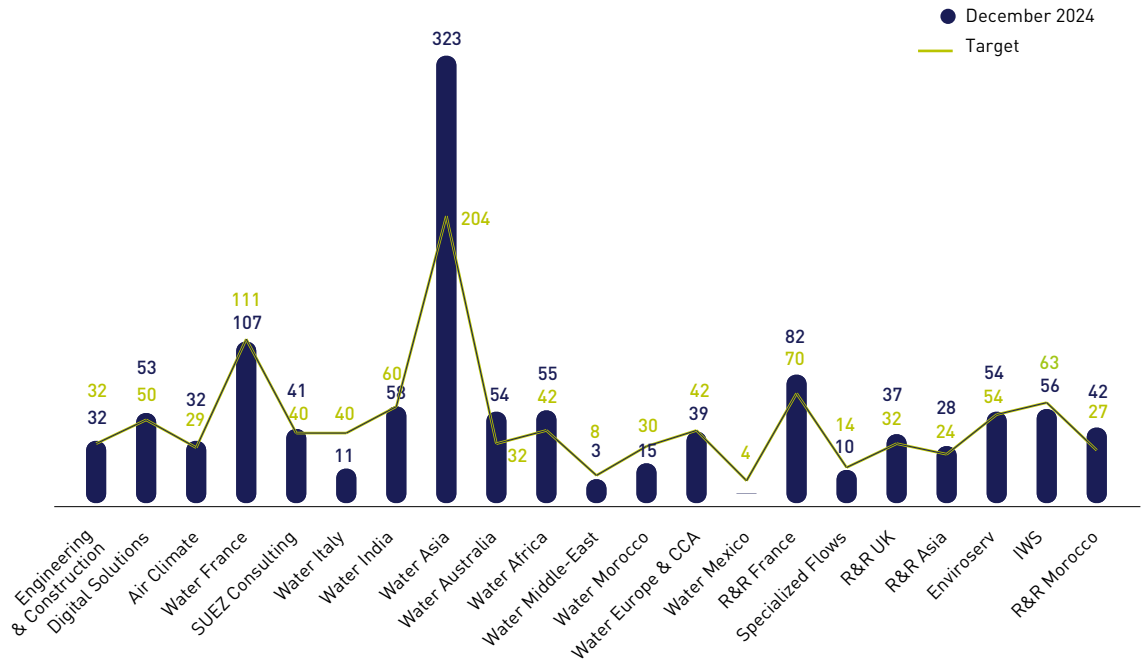
- ***Severity rate** = Number of lost days as a result of an occupational accident (including relapses of accident) multiplied by one thousand, divided by the number of hours worked of the considered period. The number of lost days counts the number of days lost in the year N, consecutive **to occupational accidents that occurred during previous years to the considered year and lost days in the year following occupational accidents that occurred in the considered period.***
- ***Days lost** = the number of calendar days lost due to occupational accidents involving staff that occurred in the considered year, with the exception of the day on which the occupational accident took place.*
- ***Employees scope** includes SUEZ employees with non-temporary contracts (CDI) + temporary contracts (CDD, alternance) and exclude Interns, interims, subcontractors.*

MANAGERIAL SAFETY VISITS (MSV) RESULTS

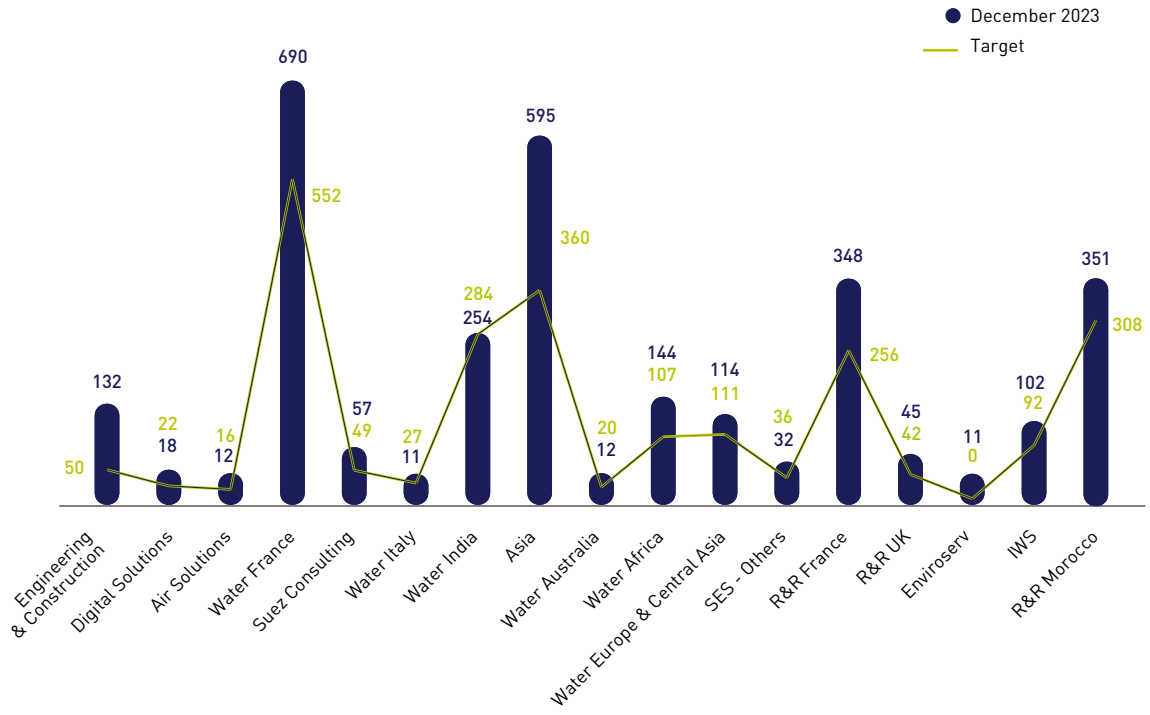
Number of MSV realised	2023	2024
Excom	1,061	1,144
Excom N-1	2,928	4,846
TOTAL	**3,989**	**5,990**

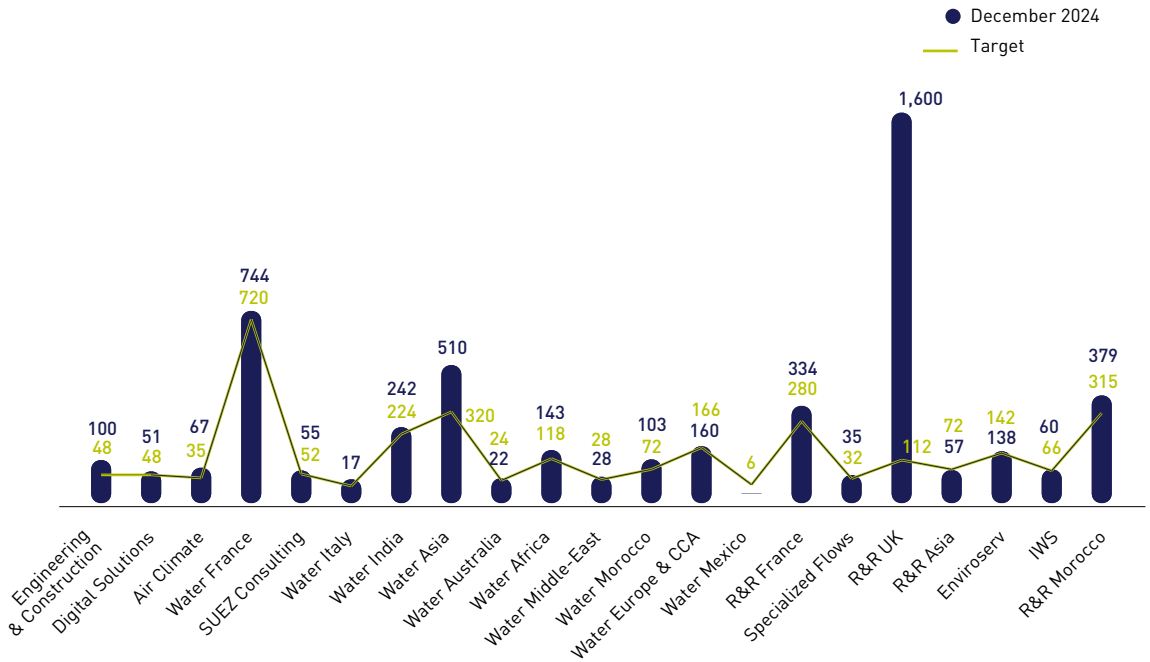
Excom – MSV results by BUs





Excom N-1 – MSV results by BUs





8.3.7. Incidents, complaints and severe human rights impacts (S1-17)

Category	Description	2024 reported Values
Number of incidents of discrimination	Total number of reported incidents of discrimination, including harassment.	6
Number of complaints filed through internal channels	Total number of complaints filed by people in the workforce through internal mechanisms to raise concerns.	5
Number of complaints filed to OECD National Contact Points	Number of complaints filed to National Contact Points for OECD Multinational Enterprises.	0
Fines, penalties, and compensation (discrimination)	Total amount of fines, penalties, and compensation for damages resulting from incidents of discrimination and harassment.	0
Number of severe human rights issues/incidents	Total number of severe human rights issues and incidents connected to the undertaking's workforce.	0
Number of severe human rights issues violating UN/OECD guidelines	Number of severe human rights issues and incidents involving non-respect of UN Guiding Principles and OECD Guidelines.	0
Fines, penalties, and compensation (severe human rights issues)	Total amount of fines, penalties, and compensation for severe human rights issues and incidents.	0
Number of cases where remedies were secured	Number of severe human rights cases where the undertaking played a role in securing remedies for those affected.	0

The HR Directors of the different Group entities were asked to report all incidents of discrimination, including cases of harassment. This feedback enabled the consolidation results to provide a comprehensive global overview.

9

WORKERS IN THE VALUE CHAIN (S2)

WORKERS IN THE VALUE CHAIN

Subtopic	Code	IRO	Type	SD Roadmap 2023-2027 Commitments
SUEZ, AN OPERATOR OF INDUSTRIAL EXCELLENCE:				
Working conditions, equal treatment and opportunities for all, and other work-related rights in the value chain	IRO-S2-1	SUEZ engages with suppliers to support the implementation of expected standards for health and safety and working conditions.	I+	Enforce basic rights among our value chain
	IRO-S2-4	SUEZ requires its suppliers to share SUEZ values in relation to human rights, health and safety and inclusion and will terminate any contracts that have a breach of ethical principles, especially with regards to child & forced labour.	I+	
	IRO-S2-2	The large number of suppliers makes it difficult to gather information on human rights, gender equality, diversity, training and skills for workers in the value chain, and to exercise any leverage on potentially bettering practices.	I-	
	IRO-S2-3	Reputational risk linked to the engagement of temporary agency suppliers for temporary workers on SUEZ sites with less control over their work-related rights.	R	

I+ Positive Impact I- Negative Impact R Risk O Opportunity

MATERIAL POLICIES

- Sustainable Purchasing Charter
- Human Rights Policy
- Ethics Charter
- HSE Policy
- Sustainable Development Roadmap 2023-2027

ACTIONS ON MATERIAL IMPACTS

- Implementing a Group-wide Duty of Care approach across the entire value chain
- Informing and training workers from strategic suppliers on best practices
- Rolling out the *Sustainable Purchasing Charter* across all Business Units
- Assessing at-risks suppliers and applying the SUEZ qualification and monitoring process for both suppliers and subcontractors
- Introducing a Group-wide Supplier Code of Conduct to ensure ethical standards across the supply chain

9.1. Strategy

9.1.1. Interests and views of stakeholders (SBM-2)

As an international Group, SUEZ is committed to understanding the impacts it may have on all workers across its value chain, including those working with suppliers and subcontractors, both upstream and downstream. In addressing potential or existing negative impacts, SUEZ strives to minimise these through its *Sustainable Purchasing Charter* and other corporate policies outlined in ⩥ section *8.2.1 Policies regarding value chain workers*, with a focus on improving working conditions, preventing discrimination, and ensuring respect for fundamental rights. Further details on this topic are available in ⩥ section *1.2.2 Interests and views of stakeholders* of this Sustainability Statement.

SUEZ aims to establish a minimum standard for its suppliers, one that goes beyond legislative commitments. This standard is implemented through a combination of policies and processes, including supplier assessments and audits.

9.1.2. Material impacts and risks and their interaction with strategy and business model (SBM-3)

At SUEZ, various categories workers within the value chain are exposed to material impacts due to the nature of their tasks and working environments, whether through direct operations or the broader value chain. As outlined in its 2024 Vigilance Plan, SUEZ value chain workers include on-site subcontractors, other subcontractors, and suppliers.

Key risks and impacts on workers in the value chain

Key concerns involve health and safety risks, human rights violations, child and forced labour, discrimination, as well as significant regulatory and technical constraints related to their work. The sectors most exposed to health, safety, and environmental risks include:

- chemicals;
- construction;
- transportation of sludges.

Meanwhile, the following sectors are particularly prone to human rights-related risks:

- temporary employment agencies and recruitment services;
- transport and logistics;
- construction sectors.

Efforts to address child labour, forced labour, and human trafficking

SUEZ actively addresses the risks associated with child labour, forced labour, and human trafficking within its value chain. The Company has implemented and regularly updates a **global mapping** of potential negative impacts, which is shared with stakeholders to raise awareness of emerging risks. While specific high-risk regions or commodities related to child labour or forced labour are not explicitly disclosed in public documentation, SUEZ monitors and assesses risks across its operations and the supply chain, with a particular focus on activities and geographical contexts.

Continuous monitoring, risk assessments, and adherence to duty-of-care laws and the United Nations Guiding Principles are integral to SUEZ vigilance in preventing human rights abuses. The Vigilance Plan, aligned with the laws of France, the UK, and Australia, reinforces the commitment of SUEZ to upholding human rights throughout its value chain. However, specific high-risk geographies or commodities are not detailed in public reports.

Material negative and positive impacts for value chain workers

In 2024, SUEZ recorded several material negative impacts on value chain workers, which included:

- one fatal accident involving a subcontractor;
- severe work accidents, such as exposure to toxic gases, falls, and machine-related injuries.

To mitigate these impacts, SUEZ employs ongoing monitoring, compliance with safety regulations, and specific health and safety actions, focusing on preventing of major risks.

In parallel, SUEZ value chain also encompasses initiatives designed to create positive impacts for different types of workers. These initiatives include:

- responsible procurement practices, ensuring ethical sourcing and fair working conditions;
- promoting social dialogue and advancing health and safety best practices to protect the well-being of all workers in the value chain;
- supporting local small and medium-size enterprises (SMEs), contributing to job creation and skills development, particularly in waste management, water treatment, and renewable energy sectors;
- fostering innovation through training and upskilling programmes, which improve workers' competencies and career prospects.

Programs aimed at improving safety, promoting of gender equality, and ensuring sustainable water management also enhance working conditions and efficiency for suppliers and workers. Specific roles, such as waste collection drivers, water treatment plant operators, renewable energy technicians, and recycling facility workers, directly benefit from these measures.

The *Sustainable Purchasing Charter* of SUEZ sets out health and safety obligations, raises safety standards and provides regular training sessions for suppliers and value chain workers. Additionally, SUEZ has introduced a Supplier Code of Conduct in the UK, with plans to extend it across the entire Group in the near future.

Material risks in the supply chain

As part of its vigilance approach, SUEZ conducts a **supplier risk assessment** that focuses on human rights, health and safety, and environmental factors. This assessment classifies suppliers into four categories, based on criteria such as the ESG index, which is updated annually by the Global Risk Profile. This aims to identify and address dependencies and potential impacts, ensuring that SUEZ value chain workers are protected from risks such as human rights violations, including discrimination and forced labour, as well as corruption. Significant efforts are also made to promote equality, diversity, and inclusion, fostering a more engaged and skilled workforce.

9.2. Impact, risk and opportunity management

9.2.1. Policies regarding value chain workers (S2-1)

SUEZ policies (*Ethics, HSE, Human Rights*, and *Sustainable Purchasing Charter*), apply to all suppliers and value chain workers.

SUEZ has implemented a range of comprehensive policies and initiatives to manage material impacts, risks, and opportunities related to value chain workers. These include also labour and human rights certifications such as ISO 45001 for the waste-to-energy plants in France.

Sustainable Purchasing Charter

SUEZ has introduced a *Sustainable Purchasing Charter* which outlines the Company's commitments to supporting the *Sustainable Development Roadmap* across three pillars: climate, nature, and social (IRO-S2-1 & S2-4). As part of its social commitment the Charter outlines SUEZ dedication to respecting human rights, ensuring the health and safety of employees and subcontractors, and prioritising suppliers who share these values. The Charter also aims to contribute to the economic and human development of the territories in which they operate through increased support for SMEs and inclusive structures. Suppliers are expected to comply with international and local legislation, including the United Nations International Labour Organisation (ILO) standards. SUEZ reserves the right to terminate contracts in cases where these principles are not upheld.

A general description of the policy is provided in ⩥ section *1.3.3 Cross-cutting material Group policies*.

In the UK, SUEZ has developed a Supplier Code of Conduct, which outlines the minimum standards expected from suppliers regarding HSE, human rights, inclusion and diversity, environmental protection, ethics and security. The Company plans to review and extend this Code across the entire Group in the medium term.

Human Rights Policy

SUEZ *Human Rights Policy* describes its commitment to upholding human rights, based on international standards, including the Universal Declaration of Human Rights, ILO conventions, and the UN Guiding Principles on Business and Human Rights (IRO-S2-1 & S2-4). The policy includes detailed measures to ensure ethical and responsible practices. SUEZ is committed to promoting human rights and duty-of-care, which is validated by independent third-party audits. It specifically addresses issues such as human trafficking, forced labour, compulsory labour, and child labour.

A general description of the policy is provided in ⩥ section *1.3.3 Cross-cutting material Group policies*.

Health, Safety and Environmental Risks Policy

The *Health, Safety and Environmental Risks Policy* of SUEZ covers key areas such as workplace accidents, environmental risks, compliance with HSE standards, and continuous improvement measures (IRO-S2-1 & S2-4). The policy outlines a global framework involving all stakeholders, including value chain workers, with the following objectives:

- fostering a proactive safety culture both internally and throughout the SUEZ value chain;
- achieving the goal of "zero severe and fatal accidents" related to SUEZ activities.

Key certifications such as ISO 45001 (⩥ see above) are part of this commitment. For more information, please refer to ⩥ section *7.2.1 Policies regarding SUEZ workforce* and to ⩥ section *1.3.3 Cross-cutting material Group policies* for a general description of the *HSE Policy*.

Group Ethics Charter

SUEZ attributes great importance to supporting its host communities and has a firm stance against all forms of corruption. The Company ensures that employees responsible for upholding ethical principles are not subject to discrimination. All employees must make SUEZ ethical and compliance principles and values an integral part of the way they carry out their work. In that respect, SUEZ has a zero-tolerance policy on corruption.

For more details on the corporate *Ethics Charter*, please refer to ⩥ section *11.1.2 Business conduct policies and corporate culture* of the Sustainability Statement.

SUEZ Policies are supported by training and awareness programmes designed for employees and high-risk suppliers. These programmes vary based on sector, country and supplier size, and are aligned with the *Sustainable Purchasing Charter* to ensure adherence to sustainability principles (IRO-S2-1 & S2-4).

The CSR clause requires all service providers to comply with SUEZ *Ethics Charter* and related policies on human rights, health, safety, and the environment. Non-compliance with these policies is treated as serious contractual breach and may lead to the suspension of contract execution.

Sustainable Development Roadmap 2023-2027

The *Sustainable Development Roadmap 2023-2027* aligns with the UN Sustainable Development Goals (SDGs), focusing on reinforcing basic rights within SUEZ value chain, promoting local wealth and inclusion, and fostering collective engagement. The roadmap sets measurable targets for the percentage of local SMEs used and the amount of spend directed towards inclusive structures. These targets are reviewed annually by the Procurement and Sustainable Directions.

International Framework reference

Through its policies, SUEZ ensures adherence to international legislation, explicitly prohibiting child and forced labour (IRO-S2-4). The Company's *Human Rights Policy* of SUEZ, which applies to subcontractors and suppliers, is based on several key international frameworks, including:

- the Universal Declaration of Human Rights and Additional Covenants;
- ILO Conventions, particularly those addressing forced labour (Conventions no. 29 and 105), child labour (Conventions no. 138 and 182), discrimination (Conventions no. 100 and 111), and the protection of the right to organise and collective bargaining (Conventions no. 87 and 98);
- the Charter of Fundamental Rights of the European Union;
- the OECD Guidelines for Multinational Enterprises;
- the UN Guiding Principles on Business and Human Rights;
- the UN Convention against Corruption;
- national laws, such as French law on the duty of vigilance and similar laws in the UK and Australia targeting modern slavery;
- SUEZ *Ethics Charter*, updated in 2022, which aligns with the Company's commitments to the UN Global Compact and the OECD Principles on water governance;
- the International Finance Corporation's sustainability standards, which apply directly to many SUEZ projects.

In 2024, no incidents of non-compliance with these fundamental principles were reported within the value chain. SUEZ ensures compliance through rigorous monitoring, regular audits, and continuous supplier assessment, overseen by the CSR Committee, which reviews annual targets.

9.2.2. General processes for value chain workers' engagement (S2-2)

Engagement with value-chain workers

SUEZ engages with suppliers and stakeholders to ensure compliance with working condition standards, as outlined in its *Sustainable Purchasing Charter* and other related policies (IRO-S2-1). Key elements of this approach include:

- **annual assessments:** Qualitative and quantitative questionnaires, conducted during supplier onboarding, tendering, and ongoing supplier management process for strategic suppliers;
- **supplier selection criteria:** Suppliers are prioritised based on environmental dependencies and business risk, with CSR clauses ensuring compliance SUEZ *Ethics Charter*;
- **third-party due diligence:** An independently verified process including regular audits to ensure adherence to human rights and sustainability standards;
- **strategic suppliers engagement:** Annual meetings, including educational campaigns on climate change, water management, plastics, and ethics;
- **non-compliance management:** Non-compliance is treated as a serious breach, with contract suspensions as necessary;
- **monitoring and reporting:** Mechanisms such as grievance systems and community-based monitoring help maintain high standards through the value chain;
- **Supplier Day in 2025:** A new initiative to reinforce engagement with suppliers, building on an established practice in the UK.

These efforts are overseen by the Group Director of Procurement, who ensures effective engagement with value chain workers of the value chain and evaluates the impact of these through continuous assessments, audits, and stakeholder feedback. A Group Duty of Care Committee has also been set up to guide the vigilance action plan, reviewing risk assessments, addressing serious incidents, investigating ethical alerts, and monitoring action plans from subsidiaries and third parties.

Gaining insight into value-chain workers' perspectives

The Company's due diligence processes, which include both preliminary and extensive assessments before entering contracts, are key to identifying potential risks to value chain workers, particularly those who are vulnerable or marginalised. SUEZ is committed to "bring employment and the circular economy together" in the regions where it operates by supporting subsidiaries, meeting their needs, and fostering local partnerships. Initiatives such as inclusion clauses in contracts and employees' commitment to solidarity help promote this agenda.

The Social Innovation Direction coordinates integration programmes that foster inclusion within SUEZ supply chain. In 2024, the Company spent €78 million on inclusive structures such as employing vulnerable people and supporting work reintegration facilities (ESATs in France). As part of its *Sustainable Development Roadmap 2023-2027*, the Group has committed to spending at least €45 million per year on these structures.

9.2.3. General processes for remediation and channels to raise concerns (S2-3)

SUEZ has established multiple channels to collect and address reports of unethical practices or human rights violations, ensuring confidentiality and protection against retaliation for those who report in good faith. The Company's whistleblowing system is open to all stakeholders and can be accessed at ethics@suez.com. For more information on the whistleblowing process and other grievance mechanisms, please refer to the ⩥ section *11.1.2 Business conduct policies and corporate culture*.

In 2024, SUEZ promoted a "Speak Up & Stop" culture across the organisation, formalising and communicating a whistleblowing procedure for both employees and third parties.

SUEZ ensures that value chain workers are aware of and trust the processes through its *Ethics Charter* and its Vigilance Plan. The *Ethics Charter* is referenced in the *Sustainable Purchasing Charter* and CSR clauses signed by suppliers.

9.2.4. Taking action regarding value chain workers (S2-4)

Human rights considerations within value chain*/short term*

SUEZ is committed to addressing material human rights impacts and risks within its value chain. In 2024, a fatal accident involving a subcontractor was reported, but this incident was not categorised under human rights issues. No violations of basic rights were reported this year. All incidents can be reported by any internal or external stakeholder via ethics@suez.com. Please, refer to the ⩥ section *11.1.2 Business conduct policies and corporate culture* for a detailed description of the whistleblowing process.

Engagement with suppliers on health and safety and working conditions (IRO-S2-1)*/short and medium term*

The SUEZ Health & Safety and Procurement Directions follow common management principles. Health and safety are integrated throughout the contractor journey at various stages:

- **pre-contractual phase:** health and safety are incorporated into procurement practices as a selection criterion when choosing contractors and providers. Additionally, it is a key contractual component, with a strong focus on Life Saving Rules and penalties for any violations;
- **during contract execution:** SUEZ ensures that safety standards remain consistent for on-site suppliers, whether they are employees or contractors. Regular meetings are held with main contractors to reinforce SUEZ commitment to Life Saving Rules. Health and safety workshops are also conducted on-site. Supplier audits are performed to assess compliance with SUEZ safety standards.

In the UK, SUEZ engages suppliers through regular newsletters that promote best practices as well as training sessions on HSE standards and human rights. High-risk suppliers who do not meet qualification criteria are required to complete additional training during onboarding. SUEZ UK also holds an annual Awards, where high-performing suppliers awarded for their excellence, including recognition for HSE practices.

Compliance with human rights, health and safety and inclusion stipulated in supplier contracts (IRO-S2-2 & S2-4)*/short and medium term*

SUEZ is committed to upholding fundamental rights across its value chain, with a strong focus on human rights, health and safety, and environmental protection. The Group has implemented various measures to prevent and address material impacts, including risk assessments, preventive actions, and corrective measures for identified violations.

To enhance its approach to mitigating and preventing human rights risks associated with its operations and supply chain, SUEZ is implementing an operational action plan based on two key pillars:

- **employee awareness and training:** on-site employees, including subcontractors, receive training on best practices for identifying and addressing human rights risks;
- **supplier risk management:** the Procurement Direction has reinforced its supplier qualification process, control mechanisms, and support systems. A risk-based supplier mapping informs these efforts, ensuring strategic suppliers comply with SUEZ ethical standards and principles of sustainable development and human rights. Ethical and sustainability clauses are embedded in the Group's general purchasing conditions (GPCs) and standard contracts. In 2024, 75.3% of supplier contracts included a CSR clause at the Group level.

As part of its Vigilance Plan, SUEZ has appointed an external auditor to conduct on-site assessments of high-risk suppliers. Additionally, a remote questionnaire evaluates high-risk suppliers against key criteria, including human rights (forced labour, child labour, and freedom of association), health and safety, and environmental compliance.

In January 2025, SUEZ convened 100 critical suppliers for its Suppliers Day, fostering collaboration on performance, quality, and sustainability, with a focus on health and safety, compliance, and human rights.

Further strengthening its commitments, SUEZ Italy SpA obtained SA8000 certification in February 2024, following an audit by RINA. This voluntary standard supports organisations in addressing key social responsibility aspects, including health and safety, forced and child labour, non-discrimination, and fair remuneration, both within the Company and across its supply chain.

This action plan is designed to deliver tangible positive impacts for workers across the value chain by preventing health and safety risks and ensuring compliance with international human rights standards.

Information access on workers in the value chain on workers in the value chain (IRO-S2-2)

The large number of suppliers, approximately 40,000 globally, poses a challenge in gathering comprehensive information about workers within the value chain. This also complicates efforts to leverage influence to improve practices.

However, SUEZ conducts risk assessments on its suppliers, which help prioritise engagement and monitoring efforts. Three main factors are considered in this methodology:

- the inherent risks of procurement categories;
- the size of the supplier;
- country-specific risks, as assessed through the annual ESG index by Global Risk Profile.

Suppliers are assessed internally based on interviews with managers and are prioritise based on their criticality to Group's operations.

Tackling the risks towards human rights and working conditions of temporary workers (IRO-S2-3)

A specific action plan has been designed for temporary agency workers and subcontractors working in sorting facilities in France. In 2024, suppliers using personnel on SUEZ sites were reminder of procedures related to duty of care and human rights. A compliance review of R&R France's main suppliers was performed, covering over 2,000 suppliers, with continuous control maintained over 600 regular suppliers. A self-evaluation questionnaire was distributed to all suppliers using personnel on SUEZ sites, and external audits were conducted on some of these suppliers.

To mitigate material risks associated with value chain workers, SUEZ is implementing several measures, including:

- commitment to the new *Sustainable Purchasing Charter*, which promotes equal treatment and opportunities for all;
- specific contract clauses for high-risk suppliers;
- promotion of the charter to suppliers, with commitment clauses in contracts;
- a Supplier Code of Conduct in the UK, which outlines standards for working conditions, including health and safety. This Code is being extended to a Group-wide policy to ensure consistency across all operations and supply chains.

Resources for managing material impacts on value-chain workers

SUEZ has established a comprehensive due diligence process, including preliminary assessments, extensive reviews, and prevention plans for third parties, especially high-risk suppliers. The Vigilance Plan strengthens the supplier qualification process. The risk level of suppliers is determined based on sector risk, country-specific risk (from external indexes), and supplier size. Workstreams are in place to monitor at-risk suppliers, aiming for 100% monitoring by 2027.

The effectiveness of these actions is tracked through specific indicators, such as:

- the number of basic rights infringements;
- the percentage of at-risk suppliers;
- the percentage of supplier contracts including CSR clause at the Group level.

Regular reviews of these efforts are conducted by the CSR Committee and the Executive Committee.

9.3. Metrics and targets

9.3.1. Targets regarding value chain workers (S2-5)

The Group is following targets regarding its commitment of enforcing basic rights among the value chain and to monitor its qualification process for suppliers and subcontractors, as follow.

Key commitments and objectives	Link to IRO	Target deadline	Reference year and baseline	Progress	Methodology
Respect basic rights throughout our value chain	The large number of suppliers makes it difficult to gather information on human rights, gender equality, diversity, training and skills for workers in the value chain, and to exercise any leverage on potentially bettering practices	100% By 2027	2024	24%	% of at-risk suppliers monitored

At-risk suppliers are identified based on a comprehensive assessment detailed in » section *1.3.2 Double materiality assessment results* of the Sustainability Statement.

SUEZ has not yet fully established all targets to drive and measure its progress in addressing the material risk or impacts on value chain workers. However, the Company plans to disclose the process for setting these complementary targets in its upcoming Sustainability Statement. This disclosure will outline:

- how SUEZ plans to directly engage with workers in the value chain, their legitimate representatives, or credible proxies with insight into their situation;
- the methods for tracking performance against these targets;
- the lessons learned and potential improvements as a result of SUEZ performance in this area.

The process for setting these targets is currently ongoing in 2024, with expectations to finalise them by 2025. The first follow-up will occur in 2026.

SUEZ is also monitoring a specific indicator tied to its material potential positive impact: "To protect the health and safety of workers in the value chain, SUEZ may engage suppliers to promote and share best practices and apply expected working conditions standards". One of the key measures for tracking this impact is the percentage of supplier contracts at the Group level that include a CSR clause. This indicator helps monitor the Company's main actions linked to these positive impacts.

10

AFFECTED COMMUNITIES (S3)

AFFECTED COMMUNITIES

Subtopic	Code	IRO	Type	SD Roadmap 2023-2027 Commitments
SUEZ, AN ESSENTIAL SOLUTIONS PROVIDER				
Communities' economic, social and cultural rights	IRO-S3-2	SUEZ provides access to drinking water, water sanitation, and waste management services participating to a better quality of life of local populations.	I+	Ensure resilience and support access to basic services in most critical situations
SUEZ, AN OPERATOR OF INDUSTRIAL EXCELLENCE				
Communities' economic, social and cultural rights	IRO-S3-3	SUEZ activities are non-delocalizable and contribute to local economic development through job creation.	I+	Contribute to local prosperity and inclusion for all
	IRO-S3-1	SUEZ facilities can generate some nuisances for neighbouring inhabitants (odor, noise, traffic).	I-	

I+ Positive Impact I- Negative Impact R Risk O Opportunity

MATERIAL POLICIES

- Human Rights Policy
- Health, Safety and Environmental Risks Policy
- Group Ethics Charter
- Sustainable Development Roadmap 2023–2027

ACTIONS ON MATERIAL IMPACTS

- Implementing our duty of care approach throughout the Group on the entire value chain
- Setting preventing and corrective measures in facilities to limit local nuisances of SUEZ activities
- Setting solutions to promote access to water for vulnerable groups such as social tariffs or water poverty diagnosis
- Developing access to essential services as part of its contracts for instance with decentralise water treatment and sanitation plants
- Collaborating with local suppliers and employing local workforce

10.1. Strategy

10.1.1. Interests and views of stakeholders (ESRS 2 – SBM-2)

SUEZ acknowledges the significant role communities play in its operations, just as it does for consumers and end-users (further detailed in ⩥ section *10 Consumers and end-users (S4)*). The Company is committed to ensuring the societal acceptance of its activities in the regions where it operates, particularly by respecting human rights. With a presence in 40 countries and over 3,000 water-related sites and 1,000 waste management sites, SUEZ considers these communities critical stakeholders whose well-being and trust are integral to its strategy and business model.

SUEZ integrates the interests of affected communities into its strategic decisions and business processes, ensuring transparency and accountability. In 2024, the Group shared its Vigilance Plan with the United Nations Global Compact France network, actively incorporating peer reviews and civil society perspectives into its continuous improvement approach. Further details on this topic are provided in ⩥ section *1.2.2 Interests and Views of Stakeholders* of this Sustainability Statement.

10.1.2. Material impacts and their interaction with strategy and business model (ESRS 2 – SBM-3)

SUEZ operations and value chain have a material impact on various communities as precised below. These communities include:

- communities near SUEZ industrial sites that may experience nuisances. This includes residents, industrial customers, businesses, and associations;
- communities benefiting from SUEZ water and waste services, even if they are not in the immediate vicinity;
- local NGOs, associations, and authorities of all sizes;
- communities affected by SUEZ supply chain operations.

Within these communities, specific vulnerable groups are identified, including individuals living in precarious conditions and indigenous populations. Notably, in countries such as Australia and South Africa, SUEZ ensures that affected communities are systematically considered in its strategic planning, business model, and materiality assessments. It is also worth mentioning that the communities benefiting from the services of SUEZ are also end-consumers, and that communities can be the customers of the services.

Overall positive impact on local communities

SUEZ activities yield numerous positive impacts across multiple regions. The Company provides essential drinking water, sanitation, and waste management services that significantly enhance the quality of life in 40 countries, spanning Europe, Africa, Australia, China, India, and the Middle East. According to 2024 figures:

- 68 million people receive drinking water from SUEZ operated production facilities (46 under CSRD accounting rules);
- over 44 million people benefit from sanitation service (39 under CSRD accounting rules);
- 13.1 million people have access to waste collection services (same order of magnitude under CSRD accounting rules);
- approximately 32.4 million tons of waste are treated annually (30.1 under CSRD accounting rules);
- 7.8 million tons of recovered materials were treated (material recovery: secondary raw materials, materials prepared for further recovery, composts and other organic fertilizers…) (7.2 under CSRD accounting rules).

These services help mitigate water scarcity, increase access to water services, improve waste management, and enhance living conditions while promoting sustainability.

Additionally, SUEZ contributes to local economic development through job creation and knowledge transfer, strengthening economic stability in the regions where it operates. Through its long-term infrastructure projects and operational contracts, SUEZ establishes stable employment opportunities and fosters expertise among local populations. For example, under a seven-year contract signed in November 2022 with Uzbek authorities and local partners, SUEZ is training future water industry leaders through the **SUEZ Uzbekistan Water Academy.** This initiative also supports economic growth by localising industrial production, such as the manufacture of 800,000 smart meters in Tashkent.

Risk mitigation and stakeholder engagement

SUEZ employs proactive and multifaceted risk assessments to prevent potential harm to affected communities. These include:

- **country risk assessments:** conducted with Global Risk Profile, these evaluations guide business development decisions and assess corruption risks during bid preparation;
- **water risk assessments:** utilising Aqueduct data, SUEZ evaluates factors such as water stress, groundwater depletion, climate variability, and floods and droughts frequency and severity. These insights inform both tender processes and operational monitoring to optimise water management strategies.

By engaging with stakeholders such as local communities, NGOs, indigenous groups, and regulators, SUEZ implements targeted actions to mitigate nuisances related to its operations (IRO-S3-1). The double materiality assessment reinforced the identification of dependencies, impacts, risks, and opportunities aligned with the enterprise risk management (ERM) process. Factors such as climate change, water scarcity, plastics, and biodiversity were considered in the assessment.

SUEZ Vigilance Plan, published annually, details its duty of care, aiming to prevent human rights violations, health and safety hazards, and environmental damage across its value chain. Furthermore, SUEZ conducts water poverty diagnostics at the contract level to identify and support communities with limited access to clean water, proposing solidarity mechanisms in water service contracts. For priority sites, **Biodiversity Action Plans** are implemented to minimise environmental impact, as outlined in ⩥ section *5.2.3 Taking action on biodiversity and ecosystems*.

Regular assessments and scenario analyses ensure that strategies are continuously adapted for maximum effectiveness. These efforts, combined with project reviews and stakeholder collaboration, demonstrate SUEZ commitment to addressing community risks.

Negative impacts and crisis management

No material risks or business opportunities arising from community-related impacts or dependencies were identified during the latest materiality assessments. These evaluations cover multiple stakeholder groups, including local communities, employees, indigenous populations, NGOs, regulators, customers, and investors. For a detailed analysis, refer to ⩥ section *1.2.1 Strategy, Business Model and Value Chain* of this Sustainability Statement.

However, in 2024, several material negative impacts on affected communities were reported, including:

- odor nuisances near landfill sites;
- drinking water contamination leading to gastrointestinal symptoms;
- wastewater overflows after heavy rainfall.

SUEZ has a robust crisis management framework, whereby specific incidents must be reported by operational managers to crisis teams. Depending on severity, a local or Group crisis cell may be activated. In 2024, no Group crisis cell activation was required.

10.2. Impact, risk and opportunity management

10.2.1. Policies regarding communities (S3-1)

SUEZ manages material impacts, risks, and opportunities related to affected communities through a comprehensive set of policies and practices, detailed below. The *Human Rights Policy*, for instance, includes commitments to managing community-related risks and opportunities, emphasising human rights, duty of care, and knowledge sharing. This policy, alongside others, is embedded within the broader *Sustainable Development Roadmap*, which aligns with the United Nations sustainable development goals (SDGs) and incorporates risk management principles.

SUEZ risk management framework relies on thorough assessments, including stakeholder interviews, double materiality analyses, emergency response management, and ongoing engagement with key stakeholders such as local communities, NGOs, regulators, and indigenous groups. The Company strengthens these policies through proactive communication, structured incident reporting, and strict regulatory compliance to mitigate material impacts and risks affecting communities.

Human Rights Policy – *focus on affected communities*

SUEZ implements a Vigilance Plan to prevent risks related to human rights, health, safety, and the environment. This plan involves regular audits, the inclusion of ethical clauses in contracts, and measures to identify and mitigate adverse impacts on people and the environment. It also supports a continuous improvement approach, benefiting both SUEZ and its partners. A general description of the policy is provided in ⩥ section *1.3.3 Cross-cutting material Group policies*.

Health, Safety and Environmental Risks Policy – *focus on affected communities*

SUEZ *Health, Safety, and Environmental Risks Policy* ensures compliance with global standards and mitigates significant health, safety, industrial, and environmental risks. It involves all stakeholders, including local communities, by:

- promoting a proactive safety culture across SUEZ value chain;
- striving for a "zero severe and fatal accidents" objective linked to SUEZ activities.

For further details, refer to ⩥ section *7.2.1 Policies regarding SUEZ Workforce* and for a general description of the policy to ⩥ section *1.3.3 Cross-cutting material Group policies*.

Group Ethics Charter – *focus on affected communities*

SUEZ is committed to supporting host communities and recognises that corruption hinders development and perpetuates poverty. Corruption can also lead to the unsustainable exploitation of natural resources, negatively impacting both the environment and communities reliant on these resources.

SUEZ strictly opposes all forms of corruption and ensures that employees responsible for upholding ethical principles are protected from discrimination. All employees are expected to integrate SUEZ ethical and compliance values into their daily work. The Company maintains a **zero-tolerance policy on corruption.**

For more details, refer to ⩥ section *11.1.2 Business Conduct Policies and Corporate Culture* and for a general description of the policy to ⩥ section *1.3.3 Cross-cutting material Group policies*.

Sustainable Development Roadmap 2023–2027 *– focus on affected communities*

Under its *Sustainable Development Roadmap 2023–2027*, SUEZ commits to enhancing community well-being by facilitating access to essential services in critical situations (IRO-S3-2). A key initiative includes integrating solidarity mechanisms into all water distribution contracts. Additionally, by 2027, SUEZ aims to map all water distribution contracts to assess water poverty levels.

SUEZ also supports local businesses through sustainable procurement practices, committing to allocate **20% of its spending to local Small and Medium Enterprises** at national or regional scales where monitoring tools are available (IRO-S3-3). Social innovation, corporate philanthropy, and academic partnerships further reinforce SUEZ positive community impact.

For further details, refer to ⩥ section *1.3.4 Sustainable Development Roadmap 2023–2027* of this Sustainability Statement.

Engagement towards indigenous communities

SUEZ has identified regions where its operations may impact indigenous communities, particularly in Australia. The Company upholds indigenous rights through a structured engagement approach, ensuring active participation ahead of project implementation. To prevent and address potential negative impacts, SUEZ has established specific policies that integrate indigenous stakeholders early in the process.

SUEZ develops tailored methodologies, tools, and training programmes to facilitate dialogue and action in affected regions. These methods apply to all critical projects, fostering innovative partnerships and local solutions.

SUEZ organisation towards community engagement

SUEZ organises its community engagement efforts across multiple company levels:

At the Corporate level:

- The **Sustainable Development Direction** oversees global stakeholder engagement, including relations with NGOs, associations, and civil society groups.
- The **Security Direction** manages crisis response and incident tracking involving affected communities.
- **Corporate Communication Direction** monitors media and social platforms to track potential controversies
- **Public Affairs Direction** handles relations with public authorities.

At the Business Units level:

- **General Managers** manage relationships with customers and public authorities.
- **Site Directors** engage with local authorities and residents' associations.
- **Customer Service Teams** manage interactions with end-users.

Alignment with international standards

SUEZ policies regarding affected communities align with internationally recognised frameworks, including the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises. These commitments are embedded in the *Sustainable Development Roadmap 2023–2027* and the Vigilance Plan.

No instance of non-compliance with these international principles involving affected communities were reported in SUEZ operations or value chain in 2024.

10.2.2. General processes for communities' engagement (S3-2)

SUEZ integrates the perspectives of affected communities into its decision-making processes to effectively manage actual and potential impacts of significant projects. This approach involves comprehensive assessments, stakeholder consultations, and sustainability initiatives to evaluate and mitigate local community impacts.

Engagement with affected communities or their legitimate representatives occurs through direct and indirect methods. SUEZ conducts stakeholder surveys (including NGOs and local communities) and facilitates dialogues through its Sustainable Development Direction to ensure local perspectives are considered in decision-making. Continuous interaction with local authorities and communities allows SUEZ to tailor solutions to specific regional characteristics. Engagement occurs at multiple stages, from initial planning to project implementation and operational phases.

Local-level engagement

- SUEZ participates in basin agencies across its areas of operation, contributing to meetings and public consultations that involve local authorities, associations, farmers, and industrial stakeholders in water management.
- At early stages of major infrastructure projects, and if required by national regulation, SUEZ conducts environmental and social assessment nurturing future action plans and dialogue with local stakeholders. During operation course, sites can organize monitoring committee gathering residents, local authorities to exchange about stakeholders' expectations and actions to implement.
- Transparency is maintained during pollution incidents through timely reporting and updates, as outlined in the crisis management process. Most SUEZ water contracts include an automated alert system for incidents. For example, in France, the **Gedicom** system notifies residents via SMS or telephone in case of major events.
- SUEZ is committed to public education on its activities and broader environmental challenges. Regular open days and school interventions are organised at various sites, with dedicated public awareness spaces on resource conservation and waste sorting.

Group-level engagement

- SUEZ actively participates in international organisations, including the OECD Water Governance Initiative, a multi-stakeholder network that shares experiences on reforms, projects, and best practices to enhance water governance.

To assess the quality and effectiveness of community engagement, SUEZ monitors its brand reputation in operational regions through online (web/social media) and offline (print/TV/radio) data, updated monthly.

Operational responsibility for engagement with affected communities

- The Chief Sustainability Officer is responsible for engagement with NGOs.
- The CEOs of Water and Waste divisions oversee engagement with local communities.

Measures for understanding the perspectives of affected communities

SUEZ takes extensive measures to understand the perspectives of affected communities, particularly those that are vulnerable or marginalised. This includes populations without access to water distribution or those facing water scarcity (⩥ see section *9.3.1 Targets regarding communities*).

Through extensive surveys, consultations, and tailored methodologies, SUEZ ensures that these communities' concerns are integrated into decision-making processes. As described in ESRS S4 Consumers and end-users, a specific attention is given to vulnerable populations, with specific initiatives including:

- adaptation of water tariffs (e.g., social tariffs) and financial subsidies such as vouchers;
- partnerships with mediation structures for coordinated support;
- territorial diagnoses on water poverty, with direct actions such as the distribution of water flow reducers.

Further initiatives targeting vulnerable communities are detailed in ⩥ section *10.3.1 Targets regarding consumers and end-users*. For policies concerning indigenous communities, refer to ⩥ section *9.2.1 Policies regarding communities*.

10.2.3. General processes for remediation and channels to raise concerns (S3-3)

Vigilance plan

As leader in the environmental sector, SUEZ manages various water and waste treatment facilities, which inherently present environmental and health risks. These risks are further compounded by climate change. To address them, SUEZ has implemented a Vigilance Plan, updated in January 2024, covering all subsidiaries and available on its website.

In compliance with French law no. 2017-399 on corporate duty of care, as well as UK and Australian regulations on modern slavery in supply chains, SUEZ Vigilance Plan aligns with the UN Guiding Principles on Business and Human Rights. It includes:

- organisational structure and duty of care framework;
- risk assessment and mapping of human rights, health, safety, and environmental risks;
- key mitigation and prevention actions;
- monitoring and performance indicators.

Structured approach to remediating negative impacts

- **Risk Management & Materiality Assessment:** Comprehensive risk assessments and double materiality analyses validate dependencies and impacts through stakeholder consultations and survey data.
- **Stakeholder Engagement:** Regular engagement with local communities, customers, and regulators ensures that concerns are addressed in alignment with the *Ethics Charter* and sustainability policies.
- **Emergency Response Protocols:** Incident response includes detailed documentation, regulatory communication, and transparent remediation processes. Preventive site assessments and crisis management exercises are conducted by the Security Direction to identify risks and enhance emergency preparedness. A dedicated governance structure ensures rapid response to community-impacting incidents.
- **Legal & Compliance Framework:** Procedures align with legal obligations, ensuring remediation efforts, financial compensation, or corrective measures in cases such as pollution incidents.
- **Remediation & Continuous Improvement:** Environmental stewardship programmes, emergency interventions, and pollution mitigation plans are regularly reviewed and enhanced for effectiveness.

SUEZ has also established a whistleblowing system, accessible to all stakeholders via ethics@suez.com and presented on its website. This mechanism facilitates the reporting and resolution of ethical and human rights concerns, reinforcing a company-wide "speak up" culture. In 2024, the Group formalised and communicated its whistleblowing procedure to employees and external stakeholders, including affected communities. This procedure covers whistleblower protection.

SUEZ ensures that affected communities are aware of and trust its processes through its *Ethics Charter* and Vigilance Plan. Further details are available in ⩥ section *11.1.2 Business Conduct Policies and Corporate Culture*.

10.2.4. Taking action regarding communities (S3-4)

Managing nuisances for neighbouring inhabitants (IRO-S3-1)/medium term

SUEZ, as a key player in water and waste management, acknowledges the potential nuisances its facilities may pose to neighbouring communities. These include:

- odour pollution: Wastewater treatment plants and waste management sites can emit unpleasant odours;
- noise pollution: Construction and operational activities may generate disruptive noise;
- traffic and air quality impact: Waste collection and processing activities can contribute to air pollution through dust and particulate matter, as well as increased traffic congestion in urban areas.

General approach for addressing negative impacts

SUEZ prioritises the prevention and mitigation of material negative impacts on affected communities, particularly in relation to waste and wastewater operations, where nuisances are most perceptible. The Company employs a comprehensive strategy integrating:

- **robust risk management:** Impact assessments are conducted based on materiality and site-specific factors, incorporated into the Enterprise Risk Management process, validated by internal stakeholders, and reviewed by Sustainable Development teams prior to project initiation;

- **preventive and corrective measures:** Implemented at existing facilities to minimise odour, noise, and air pollution, including:
  - installation of dedicated treatment units,
  - deployment of biogas capture and processing systems,
  - operational controls to reduce odour dispersion,
  - application of masking agents in landfill working areas,
  - regular noise level monitoring and compliance checks,
  - adjustments to operating hours in residential zones to reduce disturbances,
  - soundproofing of technical areas and noisy equipment,
  - use of compressed natural gas (CNG) or electric collection vehicles.

At site level, monitoring committees can be set up to bring together local stakeholders to take stock of expectations and actions taken to meet them.

Nature standards for sites and construction

From 2025, SUEZ will implement the *Nature Standard for Sites* and *Nature Standard for Construction Sites* policies, aligned with the Nature Pillar of the *Sustainable Development Roadmap 2023-2027*. These policies aim to:

- establish a unified environmental framework for operational teams;
- standardise best practices for sustainable site and project management;
- promote biodiversity preservation within project planning and partnerships.

Additionally, these standards address site-generated disturbances by recommending measures to reduce noise and light pollution. They will be me mandatory for all priority sites (as described in ESRS E4) and recommended for all others, in all countries from all activities.

Stakeholder engagement and incident management

SUEZ maintains active dialogue with local communities, NGOs, and other stakeholders to ensure the well-being of affected populations. Immediate alert systems, continuous improvement initiatives, and transparent reporting mechanisms are employed to address and resolve incidents, with further details provided in ESRS S4 on Consumers and End Users.

Solutions to minimise odour nuisances

To manage odour-related nuisances, SUEZ has developed "NOSE", a service that objectively assesses and models the olfactory footprint of wastewater treatment, sludge recovery, and waste management sites. NOSE ensures compliance with odour thresholds, typically maintaining levels below two odour units per cubic metre (OU.m³), well within regulatory limits of five OU.m³, where applicable. The NOSE approach consists of six key steps:

1. **avoid:** optimised asset management and sedimentation prevention;
2. **diagnose and map:** use of air sensors, criticality studies, and socio-cartographic assessments;
3. **monitor and predict:** deployment of predictive modelling tools (e.g., Vision 360° and Previodor);
4. **treat:** implementation of reagent injection, deodorisation, and neutralising agents;
5. **optimise:** enhancing reagent injection efficiency;
6. **communicate:** engagement through public panels, reporting, and transparency initiatives.

Measures to mitigate traffic and air pollution

SUEZ is committed to reducing traffic congestion and air pollution generated by its waste collection operations. This includes the transition to low-carbon emissions and electric vehicle fleets:

- **United Kingdom:** Under the new Milton Keynes City Council contract, SUEZ is deploying fully electric waste and landscaping vehicles. Similarly, in the Mid-Kent Waste Partnership, new waste collection vehicles will feature electric bin lifts;
- **France:** By 2025, Nîmes will operate a fleet of 40 collection vehicles using alternative fuels, primarily waste vegetable oil. In Limoges, waste collection will transition to 16 electric trucks and 10 XTL biofuel-powered vehicles.

Comprehensive air pollution prevention measures across SUEZ activities are further detailed in Chapter 3 "Pollution".

Contributing to a better quality of life by providing access to essential services (IRO-S3-2)*/short and medium term*

SUEZ plays a crucial role in enhancing quality of life by providing access to drinking water, sanitation, and waste management services. As a provider of tailored business solutions, SUEZ adapts its services to the specific needs of each region, municipality, agricultural operation, and industrial site. The Company aligns its investment strategies with the United Nations Sustainable Development Goals (SDGs) to deliver local expertise while considering economic, legal, and technical realities. SUEZ is committed to supporting the achievement of the 2030 UN SDGs, particularly SDG 6 (clean water and sanitation), SDG 7 (affordable and clean energy), and SDG 13 (climate action).

Ensuring access to essential services

SUEZ develops solutions to enhance access to essential services in both developed and developing regions:

- **Developed countries:** SUEZ supports social policies ensuring access to water for economically vulnerable populations. This includes mediation programmes, subsidised tariffs, and tailored financial support mechanisms, implemented in collaboration with local stakeholders.
  - In France, the European Drinking Water Directive was transposed into national law on 1 January 2023, incorporating provisions for universal access to water. In anticipation, SUEZ developed targeted initiatives for vulnerable groups, including social support mechanisms such as water vouchers and eco-solidarity tariffs. As of 2024, 60% of SUEZ drinking water contracts in France include solidarity mechanisms.
  - In response to increasing economic hardship and water resource preservation challenges, SUEZ launched the "Plomberies Solidaires" initiative in 2018, assisting individuals in water-precarious situations to manage their water consumption. As of 2024, six plumbing services have been deployed.
- **Emerging markets:** SUEZ applies its expertise to improve and expand services in underprivileged and unconnected urban areas.
  - In the Manila metropolitan area, Philippines, SUEZ has facilitated access to clean water for 900,000 residents through the deployment of four decentralised compact units (UCDs®), offering a rapid and scalable alternative to conventional water treatment plants. These units, commissioned in 2023, can collectively produce up to 80,000 m^3 of potable water per day.
  - In Angola, SUEZ is addressing water scarcity through the PROAGUA project, modernising and managing drinking water distribution in the Luanda region. This initiative is expected to improve access to clean water, enhance water quality, and reduce waterborne diseases.

Commitment to philanthropy and social responsibility

SUEZ actively collaborates with civil society, leveraging employee expertise and engagement. In 2024, SUEZ employees contributed 21,431 hours of voluntary service with local associations.

SUEZ philanthropic efforts focus on areas with the greatest need, distinctly separate from its commercial activities. The Company supports solidarity mechanisms and decentralised cooperation initiatives within its public service delegation contracts. Additionally, SUEZ operates three foundations and two associations across Europe and Asia, allocating an annual budget exceeding €3.2 million to philanthropic initiatives.

The SUEZ Foundation comprises six directors, including an employee representative and three specialists in relevant fields. The Foundation supports access to essential services through partnerships with NGOs such as Aquassistance, an employee-led organisation providing water, sanitation, and waste management support worldwide. Since its inception in 2009, the Foundation has trained over 500 water and wastewater management professionals from four continents through the AgroParisTech-SUEZ Chair programme. The Foundation also plays an active role in France on the theme of inclusion, supporting employment and training for people who have fallen out of the workforce, and social cohesion through education, culture, and sport for young people in priority urban districts and fragile rural areas.

2024 key philanthropic actions

- **Revised Strategy:** The SUEZ Foundation reoriented its focus towards projects enhancing access to essential services in developing countries and promoting ecological and social inclusion in France.
  - It continues its call for projects, supporting NGOs and associations.
  - It introduced a new project selection method based on territorial diagnostics, exemplified by partnerships with "Pépins Production" (urban greening) and "Le Grand Bleu" (marine resource preservation) in Marseille.
  - Under the "Great Partners" initiative, the Foundation established a long-term collaboration with the Rura association, promoting equal career opportunities for young people in rural areas.
- **Humanitarian Response:** In May 2024, the Foundation supported the NGO Acted in Haiti amid a severe crisis, facilitating humanitarian aid efforts. Following Cyclone Chido's devastation in Mayotte in December 2024, it provided emergency relief through "Care France".
- **Global NGO Support:** In Uganda, the Foundation supported Stichting Simavi to enhance school hygiene and sanitation using a gender-based approach. It also backed "Acted" in constructing climate-resilient water and sanitation infrastructure in the Philippines.
- **French Social Inclusion Initiatives:** Beneficiaries included Emmaüs Connect, combatting digital exclusion, and La Cravate Solidaire, promoting professional inclusion through the reuse of office clothing.

Working within the framework of the UN's Sustainable Development Goals, the Foundation works with its partners to ensure the sustainable and long-lasting impact on the populations concerned by the projects it supports.

Aquassistance: 30 years of humanitarian water aid

As part of its commitment to improving access to essential services, the SUEZ Foundation supports partner organisations, including **Aquassistance,** a French NGO founded in 1994 by SUEZ employees. Comprising a network of 650 members, including employees and retirees, Aquassistance mobilises volunteers' expertise and resources to support water, sanitation, and waste management projects worldwide. The organisation provides assistance to vulnerable populations through both long-term development initiatives and emergency response efforts. In 2024, Aquassistance celebrated its 30th anniversary, marking three decades of humanitarian action.

Training future leaders urban water management

In 2008, the SUEZ Foundation partnered with **AgroParisTech** to establish the "**General Management of Urban Water and Wastewater Services" Chair,** supported by the Agence Française de Développement (AFD) since 2009. This initiative directly contributes to UN Sustainable Development Goal (SDG) 6: Access to Clean Water and Sanitation by strengthening the capabilities of urban water and sanitation service managers through specialised training, knowledge-sharing, and research. The Specialised Master's programme aims to equip high-level professionals, business leaders, and entrepreneurs – both from public and private sectors – with the expertise needed to manage and develop urban water and sanitation services, particularly in emerging and developing countries. Since its inception, the programme has trained over 500 managers across four continents.

Contributing to local economic development (IRO-S3-3)*/medium and long term*

SUEZ core activities are inherently localised, fostering economic development through job creation, local procurement, and community engagement. For example, water treatment requires local plants and facilities to manage and process water for communities. Waste management relies on physical collection, sorting, recycling, and disposal facilities, all of which are typically located within the regions they serve.

SUEZ contributes significantly to local economic development, particularly through:

- **job creation:** SUEZ employs a diverse workforce across its facilities, from technical and operational roles to administrative and managerial positions;
- **local procurement:** Approximately 34% of SUEZ expenditure is directed towards SMEs within its operating countries, stimulating local economies;
- **community impact:** By improving water and waste management services, SUEZ enhances public health and infrastructure, indirectly bolstering other economic activities (public health improvements, better infrastructure, etc.);
- **social innovation:** The Company collaborates with local entrepreneurs to develop circular economy initiatives. SUEZ inclusive programmes supported 3,394 beneficiaries in 2024, with the Rebond Insertion initiative helping 882 disadvantaged individuals secure employment and address housing, mobility, and health challenges. Notably, 70.2% of participants transitioned to stable employment or vocational training.

Sustainable development and inclusive economy

SUEZ extends its "Services for All" expertise to waste management and recycling activities in emerging economies.

- In **South Africa,** SUEZ subsidiary EnviroServ integrates informal waste reclaimers at Chloorkop and Rosslyn landfills into formal operations, improving their working conditions and economic stability through access to protective equipment, training, and infrastructure.
- In **India,** SUEZ programme in the Cossipore district of Kolkata, aims to reduce water losses and enhance service for 420,000 residents. It includes AI-driven network optimisation and partnerships with the women's self-help group Jal Bandhus, providing training in plumbing and water conservation awareness.

To measure the effectiveness of these initiatives, the Company's *Sustainable Development Roadmap 2023-2027* sets clear targets, detailed in section *9.3.1 Targets regarding communities*.

Human rights considerations for affected communities

No severe human rights issues and incidents connected to affected communities have been reported in 2024.

10.3. Metrics and targets

10.3.1. Targets regarding communities (S3-5)

SUEZ has established clear targets within its *Sustainable Development Roadmap 2023-2027* to address material impacts on affected communities. These targets include action plans to promote solidarity mechanisms that mitigate risks of conflicts over water resources and ensure the affordability of services for vulnerable populations. SUEZ also prioritises maintaining water quality, complying with legal obligations, enhancing infrastructure resilience against environmental hazards, and strengthening operational response capabilities for impacted communities.

While the Group has set metrics to monitor progress at the contract level, it has not yet defined specific targets for mitigating its negative impact on communities, particularly in relation to nuisances. The Group is currently implementing standards across all sites and workstreams to reduce environmental impacts, including those related to light pollution, noise, and dust.

Key Commitments and Objectives	Link to IRO	Target Deadline	Reference year and Baseline	Progress 2024	Methodology
Support access to basic services in most critical situations	SUEZ provides access to water sanitation and waste management services to offer a better quality of life of local populations	100% from 2023	2023: 60% (France)	87% (Group)	% of contracts (water & sanitation services) covered by a solidarity mechanism
	SUEZ provides access to water sanitation and waste management services to offer a better quality of life of local populations	100% by 2027	2023: 54% (France)	33% (Group)	% of water distribution contracts "profiled" towards water poverty (i.e. mapping of areas at risk regarding availability of, accessibility or affordability of services)
Contribute to local wealth and inclusion for all	SUEZ activities are non-delocalizable and contribute to local economic development through job creation	5,000 persons per year by 2027	2021: 2,308	3,394	# of beneficiaries of SUEZ inclusive structures & job inclusion programmes
	SUEZ activities are non-delocalizable and contribute to local economic development through job creation	45 M€ from 2023 by 2027	2021: 29 M€	78.1 M€	€ spent with inclusive structures (i.e., employing vulnerable people; work reintegration facilities [ESATs] in France)
	SUEZ activities are non-delocalizable and contribute to local economic development through job creation	20% by 2027	First publication in 2023	1,847 M€ (34% of total spend) [2]	% of spent with local SMEs [1]

(1) Small and Medium Entreprise.
(2) % on a national scale – tools that do not currently allow monitoring on a regional scale.

SUEZ actively gathers feedback from stakeholders, including affected communities, through surveys, systematic consultations, and the analysis of input from both traditional and digital media channels. This feedback is incorporated into the *Sustainable Development Roadmap 2023–2027*, ensuring that community perspectives inform strategic initiatives. SUEZ engagement also includes the implementation of methodologies and the provision of training for managers to strengthen societal contributions at the local level.

In addition, SUEZ engages communities through stakeholder reviews and dialogues with subsidiaries, revising targets based on these assessments. For specific incidents such as pollution, communication with affected communities is prompt, with detailed updates provided. However, structured feedback mechanisms for monitoring performance against targets are not explicitly outlined.

11 CONSUMERS AND END-USERS (S4)

CONSUMERS AND END-USERS

Subtopic	Code	IRO	Type	SD Roadmap 2023-2027 Commitments
SUEZ, AN ESSENTIAL SOLUTIONS PROVIDER				
Social inclusion of consumers and/or end-users	IRO-S4-3	SUEZ is improving access to water services for all its consumers and end users with various initiatives which are not limited to specific technologies or social and tariff engineering.	I+	Support access to basic services in most critical situations
Personal safety of consumers and/or end-users	IRO-S4-1	SUEZ ensures the health & safety of its consumers & end-users by implementing very strict water quality management standards across each Business Unit. SUEZ monitors it centrally to ensure the uniformity in our quality standards.	I+	
SUEZ, AN OPERATOR OF INDUSTRIAL EXCELLENCE				
Personal safety of consumers and/or end-users	IRO-S4-2	The tightening of regulatory requirements, combined with a shortage of water and a deterioration in its quality, means that treatment costs are rising, with a long-term impact on water prices.	I-	Support access to basic services in most critical situations

I+ Positive Impact I- Negative Impact R Risk O Opportunity

MATERIAL POLICIES

- HSE Policy
- Human Rights Policy
- Sustainable Development Roadmap 2023–2027
- Drinking water quality directive

ACTIONS ON MATERIAL IMPACTS

- Protecting Health & safety of consumers & end-users
- Avoiding long-term impact on water prices
- Improving access to water services
- Ensuring transparency and gathering customer feedback
- Monitoring and improving service quality
- Installing smart metering while preserving privacy safeguards
- Engaging proactively with customers

11.1. Strategy

11.1.1. Interests and views of stakeholders (SBM-2)

As a global company, SUEZ is committed to understanding and addressing the potential impacts of its activities on the interests, views, and rights of its consumers and end-users, with a strong emphasis on respecting their human rights. These stakeholders are integral to the Company's strategy and business model, as their well-being and trust are vital to SUEZ success.

To minimise any negative impacts on consumers and end-users, SUEZ has deployed comprehensive policies and initiatives. The Group's *Health, Safety, and Environmental Risks (HSE) Policy* ensures that SUEZ delivers services and products that meet the highest safety and environmental standards, reducing potential risks to end-users. Moreover, the *Human Rights Policy* highlights SUEZ commitment to upholding fundamental rights and preventing discrimination or harm to consumers and end-users across all operations. The compliance towards the *HSE Policy* across the BUs is monitored at corporate level through Key Performance Indicators. Further to enforce the policy effectively and commitment towards the consumers and end-users, SUEZ has identified Health & Satefy as one of the critical and mandatory Key Performance Area of employee's yearly performance review.

These policies guide the approach of SUEZ to integrating consumers and end-users' interests into its strategic decisions and business processes, ensuring both transparency and accountability. For more information on this topic, please refer to ⩥ section 10.2.1 of this Sustainability Statement.

11.1.2. Material impacts and their interaction with strategy and business model (SBM-3)

At SUEZ, it is acknowledged that consumers and end-users may be impacted by various material impacts, primarily linked to the accessibility, safety, affordability, sustainability, and performance of its water and sanitation services. To effectively address these matters, SUEZ has implemented a comprehensive and systematic approach that prioritises transparency, safety, and sustainability.

SUEZ operations affect a broad spectrum of consumers and end-users. To better understand and measure the potential impact of activities, these stakeholders are categorised into specific groups. This segmentation enables SUEZ to assess the nature and extent of the impact, ensuring that appropriate actions are taken to address them effectively.

The **types of impacted consumers and end-users,** who are directly or indirectly impacted by SUEZ operations, include:

1. **Residential or Domestic** – Individuals or households relying on SUEZ utility services for safe and affordable drinking water and sanitation services;
2. **Commercial and Industrial** – Businesses such as hotels, manufacturing units, and food production facilities, that depend on water for their operational needs;
3. **Public Institutions** – Government offices, schools, colleges, hospitals, and other essential institutions that rely on water and wastewater services for efficient service delivery;
4. **Socially Vulnerable Groups** – Low-income groups, elderly individuals, and persons with disabilities who face challenges in accessing water and sanitation due to financial constraints or physical barriers;
5. **Businesses** – For example, bottled water companies that depend on clean and efficient water services for their operations;
6. **Industrial Clients** – Particularly in sectors like petrochemicals and automotive manufacturing, affected by recycling processes, such as electric vehicle battery recovery;
7. **Business Partners, Suppliers and Contractors** – Entities working with SUEZ who are directly or indirectly impacted by SUEZ operations.

SUEZ clients – including municipalities and businesses – along with end-users rely on accurate data (e.g. water consumption pattern) to make informed decision and plan for future needs. Ensuring data reliability is therefore integral to SUEZ service delivery and stakeholder trust.

Material negative impacts

While no major material negative impacts were recorded in 2023, isolated incidents have occurred, including pollution events affecting water supply and wastewater treatment. Such events can lead to financial and health implications for affected populations. To mitigate these risks, SUEZ implements comprehensive policies, and takes immediate action to address incidents. Specific measures include improving water quality, ensuring operational reliability, and strengthening preventative and emergency response protocols.

Material positive impacts

SUEZ incorporates several initiatives into its operational strategy, risk management, and stakeholder engagement to ensure transparency and alignment with sustainability goals. Continuous efforts are made to minimise adverse impacts while enhancing positive outcomes for all materially impacted consumers and end-users. Some key initiatives include:

- **comprehensive context studies:** Before beginning operations in any new region, SUEZ conducts thorough studies to assess the impact of its activities on local communities and to understand stakeholder' apprehensions and expectations. These studies help inform strategy and decision making to minimise material impacts;
- **customer engagement:** The "voice of the customer" plays a central role in SUEZ strategy. SUEZ has a well-defined process for regularly capturing consumer feedback and incorporating these insights into decision-makings processes, demonstrating SUEZ commitment to strong customer engagement and inclusion in decision making;
- **advanced technologies:** SUEZ has developed water and wastewater management technologies, which form a backbone of the Company's operations. These technologies such as desalination and modular water production units, help improve access in water-stressed regions;
- **high water quality standards:** SUEZ adheres to robust water quality standards that evolve in response to treatment challenges. The Company monitors and benchmarks water quality parameters across all SUEZ sites, ensuring that high standards are met, regardless of local regulations. SUEZ Technical Research Center continuously works on improving water quality parameters to safeguard public health;
- **recycling and resource recovery:** SUEZ dedicated division for recycling and resource recovery collaborates with municipalities to reduce pollution, enhance public health, and support local communities;
- **access for socially vulnerable groups:** Through an innovative solidarity tariff structure implemented in some contracts, SUEZ ensures that socially vulnerable groups, such as low-income households, have equitable access to water and sanitation services at affordable rates;
- **digital transformation:** SUEZ is committed to enhancing its digital capabilities with a dedicated direction focused on innovative digital solutions. The Company's roadmap for digital outreach spans all business units (BUs) and operations, helping to reduce carbon footprints and optimise resource consumption, which ultimately supports transparency and sustainability;
- **water conservation and awareness:** SUEZ empowers consumers by promoting awareness of water conservation, hygiene, and safe water practices. The Company engages with local communities and stakeholders through various programmes that contribute to sustainable water management practices.

11.2. Impact, risk and opportunity management

11.2.1. Policies regarding consumers and end-users (S4-1)

SUEZ has developed several key policies to effectively manage both the positive and negative impacts related to its customers and end-users.

Health, Safety, and Environment (HSE) Policy *– focus on consumers and end-users*

SUEZ is committed to safeguarding the health and safety of its workforce, consumers, and end-users by adhering to rigorous HSE standards (IRO-S4-1). This includes full compliance with safety regulations, proactive risk prevention measures, and routine safety audits.

The *HSE Policy* is cascaded through all business units (BUs) via a structured framework, ensuring alignment, compliance, and effective implementation across operations. The process begins at the corporate level, where SUEZ establishes a comprehensive *HSE Policy* based on regulatory requirements, industry best practices, and corporate sustainability goals. This policy serves as the foundation for business units, ensuring a consistent approach to mitigating risks for both employees and consumers. To ensure strict compliance and improve the adoption of safety practices, a robust reporting and review mechanism is in place across all BUs.

The Health and Safety Direction at SUEZ has developed a structured training programme to ensure that all employees – from field operators to senior managers – understand safety protocols and their role in implementation. Regular workshops, e-learning modules, and toolbox talks are organised to reinforce the safety culture throughout the Company.

Human Rights Policy *– focus on consumers and end-users*

The Group commits in this policy to actively contribute to the implementation of the universal right to water and sanitation (ODD 6). It also mentions continuity of its services as part of its duty: the Group's contracts include on-call duty for operational teams. SUEZ develops, tests and regularly updates crisis management plans, including temporary access solutions in the event of prolonged service interruption. The Group ensures finally the availability of solidarity mechanisms for vulnerable users as part of its commitment to equitable access to water resources (IRO-S4-3).

SUEZ *Human Right Policy* outlines the Company's commitment to respecting human rights, based on international standards, such as the Universal Declaration of Human Rights, ILO conventions, and the UN Guiding Principles on Business and Human Rights. These commitments apply to all subsidiaries, partners, suppliers, and subcontractors.

Sustainable Development Roadmap 2023-2027 *– focus on consumers and end-users*

SUEZ incorporates water efficiency and preservation programmes into all contracts, especially in water-stressed regions and adapts priority sites to climate change through defined and financed action plans. Additionally, the roadmap focuses on improving access to water services for all through innovative technologies and social and tariff engineering, with a goal of extending solidarity mechanisms to all customers (IRO-S4-3). It also includes close monitoring of consolidated results on customers surveys, translated into a net promotor score (NPS).

Drinking water quality directive

Each Business Unit follows a general framework detailing the procedures and recommendations for drinking water quality management. This ensures that operational teams can prevent and anticipate risks and efficiently manage occasional or recurring water quality issues (IRO-S4-1).

The directive has two major objectives:

- ensuring customers' health and satisfaction;
- complying with local and national regulations.

It typically covers non-conformity management and water quality monitoring guidelines for on-sites operators.

Alignment of policies with internationally recognised instruments

The Group adheres to international human rights treaties and standards as a minimum commitment across all its operating countries. These frameworks guide SUEZ efforts to uphold and promote human rights in all business activities, as outlined in the SUEZ *Human Rights Policy* – described above – and *Ethics Charter* – described in » section *11.1.2 Business Conduct policies and corporate culture*.

11.2.2. General processes for consumers and end-users' engagement (S4-2)

SUEZ integrates consumers and end-users' perspectives into its strategic and operational decisions to effectively manage actual and potential impacts. A range of mechanisms are employed to gather and analyse consumer feedback, ensuring their views are incorporated into SUEZ action plans.

Key engagement processes

- **Regular client meetings:** SUEZ organises regular client meetings, where representatives or nominated members of the municipality provide guidelines for the implementation of contract commitments in terms of water or wastewater services. These guidelines can incorporate consumer suggestions for inclusion in service strategies.
- **C-SAT (customer satisfaction) surveys:** SUEZ conducts regular consumers and stakeholder satisfaction surveys, collecting feedback based on pre-defined parameters. The insights gained are shared with business units, which are responsible for defining corresponding action plans.
- **Analytical tools:** Various analytical tools are used to assess consumer feedback from press, social media, and stakeholder publications. Key Directions, including Strategy, Sustainable Development, Public Affairs, and Marketing & Communications, integrate this feedback into the Company's processes.
- **Sustainable Development priorities:** To prevent or address controversies related to its activities, SUEZ adheres to a proactive policy of dialogue. It regularly consults experts and stakeholders to address challenges as they arise. The Sustainable Development Direction coordinates these efforts, raising awareness among managers and involving internal stakeholders.

Consumers interaction tracking

SUEZ maintains a system to track consumer interactions and complaints, enabling swift and transparent responses to consumer concerns.

- **Customer Relationship Management (CRM) Systems**
  - Centralise consumer master database logging all interactions (phone, in-person, app, chat, social media, etc.).
  - Automatic tracking of consumer touchpoints for personalised service.
  - Unique ticket numbers assigned to each interaction for efficient resolution.
  - Historical logs of interactions to enhance context and customer experience.
- **Omnichannel Approach**
  - Seamless integration across communication channels (phone, web, app, chat, social media).
  - Consumers can track their interaction status with SUEZ in real time via any mentioned channel.
- **Customer Service Dashboards & Reports**
  - Dashboards track interaction volume and types, resolution rates, and pending requests.
  - Reports with interaction analysis support data-driven improvements and action plans as part of a continuous improvement strategy of SUEZ services.

Engagement across various stages

Engagement with consumers and end-users occurs at different stages of operations and the downstream value chain, ensuring comprehensive responsiveness to stakeholder needs. This includes transparency during pollution incidents and communication with affected communities, public administrations, and third parties. The *Sustainable Development Roadmap 2023–2027* includes specific KPIs to measure strategic consumer engagement, particularly focused on water resource preservation.

Specialised consumer engagement structures

Senior Management Involvement – These roles collectively ensure that engagement with consumers and end-users occurs and that their feedback shapes the Company's strategic direction and operational decisions.

- The Chief Sustainability Officer (CSO) oversees the *Sustainable Development Roadmap*, reporting to the Executive and CSR Committees.
- The Project Managers at SUEZ CIRSEE are involved in specific engagement activities related to technical and scientific results.

The appointed Environmental Industrial Risk Officer (EIRO), also hold significant responsibilities in their respective domains, contributing to the overall consumer and end-user engagement approach.

Public reporting and Third-party audits – Ensure transparency and alignment with sustainability goals.

Support to socially vulnerable group

SUEZ is committed to social inclusion towards socially vulnerable groups by implementing a range of initiatives to support underserved communities worldwide. These initiatives are designed to make services accessible and responsive to the unique needs of vulnerable groups, including low-income households and people with disabilities. In some countries, according to the national regulation, SUEZ supports its municipal clients in assessing water poverty, helping to better target social supporting schemes. However, SUEZ does not have a Group process to identify vulnerable groups. On a global scale, SUEZ ensures compliance with international accessibility standards for people with disabilities across all its offices. Accessibility is a core part of its commitment to inclusivity, ensuring that individuals with disabilities can access its services and infrastructure. Here are some concrete examples of this approach:

- **Dunkerque, France:** SUEZ introduced a tiered tariff system, based on the customer's needs, This system has three tariff levels depending on the use of the water: essential water, useful water and comfort water, with a minimum reduction of 20% for "essential water" in order to make it accessible to all;
- **France:** launch of a pilot eligibility simulation programme called "Simul'eau", designed to help users and social workers easily identify the assistance available (housing solidarity fund, water vouchers, etc.) in connection with the payment of the water bill. This tool aims to remedy the non-take-up of social assistance by offering beneficiaries and social workers a simple and accessible solution for accessing assistance programmes. If the solution proves relevant, it should be fully deployed by 2025;
- **Tanggu China:** SUEZ implemented an elderly-friendly water consumption monitoring and early warning platform to track water usage 24/7 for elderly individuals living alone. The platform identifies potential risks and sends real-time alerts, provides health advice, and offers emergency rescue services to improve the quality of life and safety of elderly consumers. A care service agreement for elderly monitoring has already been signed with the local community, allowing for personalised follow-up.

Consumers engagement through surveys

SUEZ enhances consumer engagement through its VOC surveys, which collect feedback from diverse population segments. These surveys provide insights into consumer perceptions of SUEZ services and initiatives, ensuring continuous service improvement.

The surveys are conducted at different intervals:

- **annual surveys:** Capture broad feedback on overarching service and operational topics;
- **transactional surveys:** Gather immediate feedback after specific interactions, such as inquiries, complaints, or bill payments.

Survey results are monitored at the business unit (BU) level to inform targeted improvement actions. Additionally, the results contribute to SUEZ net promoter score (NPS), which is reviewed by the Executive Committee and integrated into the Company's *Sustainable Development Roadmap* commitments. In 2024, the Group's NPS was +25 for the Water Division and + 11 for the Waste Division, reflecting a significant improvement since the 2022 reporting period.

SUEZ commitment to customer service excellence has been widely recognised. For the sixth consecutive year, SUEZ Water France Customer Relations received the "Élu Service Client de l'Année" award in the "Distribution d'eau" category. This award highlights SUEZ consumer engagement efforts, particularly through its collaboration with the Aquavesc syndicate in western Paris.

Through these surveys, SUEZ continuously adapts its services to better meet consumer expectations, reinforcing its consumer-centric approach and commitment to continuous improvement. Additionally, SUEZ collaborates with NGOs, governmental bodies, and community leaders worldwide to address diverse consumer needs. These efforts include community outreach initiatives aimed at fostering inclusive service provision and decision-making processes.

11.2.3. General processes for remediation and channels to raise concerns (S4-3)

Risk assessment and remediation approach

SUEZ double materiality assessment has identified no material negative impacts on consumers and end-users. However, the Company proactively monitors potential risks (IRO-S4-2), including:

- tightening regulatory requirements, which could impact compliance results;
- water shortages, potentially affecting service continuity;
- declining water quality, leading to higher treatment costs and potential long-term impacts on water pricing;

To mitigate these risks, SUEZ has implemented a structured, proactive approach:

- risk-based materiality assessments and third-party evaluations;
- compliance and ethics management procedures ensuring adherence to regulatory and industry standards;
- crisis management plans to ensure service continuity.

Consumer engagement and remediation channels

SUEZ has established multiple consumer feedback channels to allow consumers and end-users to raise their concerns, as outlined in ⩥ section *10.2.2 General processes for consumers and end-users engagement* of this Sustainability Statement:

Consumer communication and reporting platforms/channels

- **24/7 call centers** to assist with inquiries and service requests.
- **Preventive & corrective maintenance alerts System** (e.g., Gedicom solution in France) via SMS or phone calls for incident notification.
- **Hotline for urgent interventions** related to water and sanitation services.
- **Consumer care centers** providing direct support.
- **Self-service kiosk, mobile apps, and web portals** for real-time services access.
- **Dedicated email addresses and chatbots** for consumer inquiries.

SUEZ ensures that these channels remain accessible, transparent, and effective, with processes in place to monitor and address consumer concerns swiftly and systematically.

Remediation processes for negative impacts

- **Incident management protocols** supported by established channels, facilitating rapid response to water quality or pollution issues. Active collaboration and communication with municipal mayors, public works collectives, and individual consumers, are key for an effective incident response, service continuity, and resolution.
- **Consumer awareness initiatives** to educate consumers on sustainable water consumption practices.

Measurement processes' and communication channels' effectiveness

SUEZ utilises various mechanisms to track and monitor issues raised by consumers and end-users, ensuring the effectiveness of these channels through regular feedback and evaluation processes. It includes **SUEZ customer relationship management (CRM) system** to track consumer interactions, complaints, and requests.

Through CRM system, SUEZ effectively monitors the KPIs related to consumer interactions and complaint handling with the help of structured approach which is support by the CRM data driven approach. The CRM system designed to captures the key information related to interaction, request or concern raised by the consumer. Followed by the actions on the interaction or request or complaint where all logs created with action steps and time taken to resolve the same. The CRM system also maintain a history of each consumer complaints to visualise the recurring issues or concern raised. There are several indicators which are being monitored at different levels to strengthen the service delivery and continuously improve the consumer relations.

Following are the key performance indicators (KPIs) which SUEZ monitors across the BUs:

- **complaint ratio** – Complaint ratio is an important indicator to show the number of consumers who contacted SUEZ for various reasons. Lower complaint ratio indicates better services;
- **first contact resolution** – It measures the percentage of consumers issues or concerns resolved in first contact with utility through any channel. It indicates the efficiency and robust mechanism to resolve the consumer complaints;
- **contact channel mix** – Gives an overview of the consumer contact channel & allows optimisation of the same so that major focus should be given to that channel which is most used by the consumers;
- **response time** – This KPI tracks the average response time against the consumer complaints or requests which allows utility to comply with the service standards or local regulations and improve the overall consumer satisfaction;
- **consumer satisfaction** – Against each complaint or request a quick consumer satisfaction survey is launched automatically where consumer satisfaction against the given resolution within the time frame is captured and analysed to continuously improve services.

11.2.4. Taking action regarding consumers and end-users (S4-4)

Ensuring health & safety of consumers & end-users (IRO-S4-1)*/short and medium term*

SUEZ ensures stringent compliance with the *Drinking water quality directive*, exceeding regulatory requirements to anticipate and mitigate risks related to drinking water quality. This directive applies to all contracts under SUEZ management in Europe, ensuring consumer health, safety, and satisfaction.

On top of water management policies and standards described in previous paragraphs, SUEZ is particularly active in R&D to lead the market in terms of innovation regarding health and safety of consumers.

SUEZ global innovation center

The International Water and Environmental Research Centre or CIRSEE (Centre International de Recherche sur l'Eau et l'Environnement) based in the Parisian region develops future-led solutions in the areas of drinking water production, wastewater treatment, waste recycling, management of public health and environmental risks, and data analysis

CIRSEE has 120 researchers, engineers and experts and several research platforms. Among these platforms, the following are contributing more specifically to water quality and health protection:

- physicochemical treatment for drinking water production (TREATlab);
- biological processes for wastewater treatment (BIOPROCESSlab);
- water chemistry and materials for distribution networks (PIPElab).

A cross-disciplinary team is dedicated to health and environmental issues, as well as three water, materials and biology analysis laboratories.

SUEZ network of experts

At SUEZ, technical experts play a key role in resolving complex issues concerning areas related to water and waste management, as well as cross-discipline activities such as health, carbon and data. This is done with the support of in-house network of 1,100 experts, 400 researchers and 45 data scientists, based in all regions of the world.

Water quality information to end-users

In France, SUEZ provides consumers with comprehensive access to water quality through the "Tout sur mon eau" portal. This platform enables end-users to access a wide range of information specific to their municipality, including:

- water analyses conducted over the last 12 months;
- concentration of nitrates and pesticides, ensuring compliance with safety standards;
- mineral composition, providing insights into water characteristics;
- bacteriological analysis results, ensuring public health protection;
- for certain cities: information on water sources, prices and distribution paths.

Additionally, SUEZ Water France has developed the **"Mon eau" mobile app,** which provides practical, real-time water-related information, such as:

- tap water quality anywhere in France;
- nearby water access points;
- safe swimming locations.

The data is sourced from open databases, including DATA-GOUV and the European Environment Agency (EEA), and is updated daily.

By making this data readily available, SUEZ reinforces its commitment transparency and consumer empowerment.

Mitigating long-term water price increases (IRO-S4-2)*/medium and long term*

In markets where SUEZ operates, water pricing is typically regulated by public authorities. Inflation, infrastructure costs, and declining consumption volumes may necessitate price adjustments. SUEZ supports local authorities in anticipating and managing these changes through innovative resource preservation and efficiency measures, aimed at minimising cost impacts on consumers.

Water distribution networks optimisation

SUEZ implements proactive strategies to enhance water distribution efficiency and preserve resources. These include:

- monitoring and renovating distribution networks to reduce leaks;
- deploying smart meters and network instrumentation for real-time yield analysis;
- enhancing water consumption forecasting models to improve distribution efficiency;
- implementing Aquadvanced™ Water Networks, which integrates sensor data (flow, pressure, flow rate) for optimised network management.

Additionally, SUEZ offers municipalities advanced solutions, such as remote metering, pressure adjustment, and leak detection, to enhance operational performance and reduce wastage.

Supporting consumers in resource preservation

SUEZ also promotes responsible water consumption through:

- tariff structures encouraging sustainable usage;
- consumer awareness campaigns;
- digital tools such as ON'connect™ Coach, which enables individuals to monitor their water consumption, detect leaks, and optimise usage.

By integrating these initiatives, SUEZ upholds its commitment to responsible water management and consumer well-being, reinforcing its role as a trusted partner in sustainable water solutions.

Improving access to water services (IRO-S4-3)*/short and medium term*

SUEZ is committed to improving access to water services for all consumers and end users through a range of initiatives that extend beyond specific technologies, social policies, or tariff structures.

As a global environmental services provider, SUEZ develops and implements technological and social solutions tailored to regional needs. These solutions must be both effective and acceptable, taking into account the unique characteristics of the areas they serve and the interests of stakeholders. SUEZ understands the role of water utility in improving the water accessibility to people with disabilities, ensuring inclusivity in the mainstream. SUEZ has various procedures, standards and technological solutions to create a positive impact for people with disabilities.

- **Accessible infrastructure** – SUEZ complies with universal design standards for infrastructures which accommodate the people with disabilities to create a conducive environment for them to reach out to us. All SUEZ offices are designed ensuring ramps, elevators, and appropriate signages.
- **Digital platforms** – SUEZ has several digital platforms to offer services like reading, billing, payments, customer requests and feedback to avail them from anywhere. This enables to outreach the community who can't or don't want to visit our offices.
- **Community outreach programmes** – SUEZ often engages with communities including people with disabilities to promote awareness about water accessibility issues faced by them. These programmes also include:
  - to train our people to understand and respond to the people with disabilities;
  - collaborate with NGOs to access and address the water accessibility needs of these people;
  - conducting awareness programmes to highlight the importance of equal access of water to everyone.

In alignment with Chapter 9 "Affected communities" in ⩥ section *9.2.4 Taking action regarding communities*, SUEZ actively develops solutions to enhance water service accessibility for vulnerable populations across all regions.

Furthermore, SUEZ is dedicated to ensuring accessibility for people with disabilities. In France, for instance, the Group has signed a charter committing to digital accessibility.

Key initiatives include:

- developing solutions aligned with the United Nations SDGs through social innovation practices;
- enhancing impact through corporate philanthropy;
- expanding influence via partnerships with academic institutions and business associations.

Responsible practices in Marketing, Sales, and data use*/short and medium term*

SUEZ is committed to preventing and mitigating material negative impacts on consumers and end users by adopting responsible marketing, sales, and data practices. The Company operates with transparency, fairness, and a continuous focus on aligning its services with customer needs and expectations. Below are the key measures implemented to balance business objectives with the prevention of adverse impacts:

- **ensuring transparency and collecting customer feedback:** To assess and address service impacts, SUEZ utilises tools such as Customer C-SAT and NPS surveys. These mechanisms enable customers to provide feedback, suggest improvements, and contribute to a culture of transparency and trust, which are fundamental to strong customer relationships;
- **monitoring and improving service quality:** SUEZ applies standard operating procedures and innovative tools, such as WIKTI, an internal tool to evaluate utility performance, focusing on service quality and customer engagement. KPIs related to water quality, supply reliability, billing accuracy, and customer satisfaction are monitored via dashboards and reviewed periodically. These insights inform action plans to drive continuous service improvements;
- **smart metering and privacy safeguards:** SUEZ smart metering solutions enable remote readings while ensuring customer data privacy. These meters also offer tools for customers to track their consumption, detect leaks, and estimate bills, fostering transparency and empowering users to manage their resources efficiently;
- **proactive customer engagement:** SUEZ employs an omnichannel approach to customer engagement, utilising multiple platforms for communication. CRM tools track interactions, providing insights that enhance service processes and minimise negative impacts. Initiatives such as first-contact resolution and self-service options contribute to swift and effective query resolution, improving the overall customer experience.

Human rights considerations for end-users

According to the latest data from the SUEZ ethics alert channel (ethics@suez.com), no severe human rights issues or incidents related to end users or consumers were reported in 2024.

SUEZ maintains regular communication with customers and end users regarding its action plans and the challenges it addresses. This is primarily achieved through the annual Progress Report, which provides transparent updates on the Group's commitments and initiatives.

11.3. Metrics and targets

11.3.1. Targets regarding consumers and end-users (S4-5)

To effectively manage material impacts, SUEZ sets achievable targets and measures progress through its *Sustainable Development Roadmap 2023-2027*. This roadmap defines key indicators and objectives addressing material impacts on consumers, end users, and affected communities, which in SUEZ context often overlap as beneficiaries of drinking water and sanitation services. Consequently, SUEZ has established shared targets under ESRS S3 and S4 to promote access to essential services in critical situations.

The target-setting process for the *Sustainable Development Roadmap 2023-2027* incorporated consumer and end-user feedback through surveys and workshops. These inputs were validated through internal stakeholder consultations and committee reviews, ensuring alignment with SUEZ sustainability strategy.

In addition, consumers and end-users are involved in performance feedback and monitoring through existing engagement processes such as meetings, C-SAT surveys and the use of analytical tools as detailed in ⩥ section *10.2.1 General processes for consumers and end-users' engagement*.

Key Commitments and Objectives	Link to IRO	Target Deadline	Reference year	Progress 2024	Methodology
Promote access to basic services in most critical situations	SUEZ is improving access to water services for all either with specific technologies or social and tariff engineering.	100% from 2023	2023 : 60% (France)	87% (Group)	% of water distribution contracts covered by a solidarity mechanism
		100% by 2027	2023 : 54% (France)	33% (Group)	% of water distribution contracts "profiled" towards water poverty
Prevent the spillage of micropollutants in natural environments	SUEZ ensures the health & safety of its consumers & end-users by implementing very strict water quality management standards	100% by 2027	2024 first publication	50%	% of commercial proposals for sanitation infrastructure [1] construction in areas at stake [2] with micropollutants removing solutions (prevention, advanced treatments etc.) [3]
Reach European electricity self sufficiency	The tightening of regulatory requirements, combined with a shortage of water and a deterioration in its quality, means that treatment costs are rising, with a long-term impact on water prices.	>1 by 2027	2021: 1.04	1.13	Share of electricity production (renewable and recycled) over electricity consumption in Europe production (%)
Limit our impact on fresh water	The tightening of regulatory requirements, combined with a shortage of water and a deterioration in its quality, means that treatment costs are rising, with a long-term impact on water prices.	100% by 2027	2023 : 100% (France)	80% (Group)	% of distribution contracts in water-stressed areas witha commitment to preserving water resources

(1) For WWTP whose capacity exceeds 200,000 inhabitants eq.

(2) Some areas contain more micropollutants in wastewater than others. Areas at stake will be defined through the coming legislation (e.g. Urban Wastewater Treatment Directive).

(3) If and when authorised by call for tenders.

SUEZ has not yet set all targets to drive and measure its progress in addressing its material risk or impacts on consumers and end-users.

Existing targets are monitored by SUEZ executive management and CSR Committee.

CSR Committee, comprising members of the Board of Directors, validates sustainability targets, ensures that adequate resources are allocated to achieve them and evaluates their implementation. It reviews progress towards the Group's commitments several times a year. The Group's Executive Committee monitors that progress, performs budget oversight and approves transformative projects that contribute to the achievement of the roadmap objectives. Throughout the year, an operational steering committee meets to monitor the progress of the commitments and their implementation within the various Group entities.

12

BUSINESS CONDUCT (G1)

12.1. Impact, risk and opportunity management

12.1.1. Material IROs related to business conduct

BUSINESS CONDUCT

Subtopic	Code	IRO	Type	SD Roadmap 2023-2027 Commitments
SUEZ, AN ESSENTIAL SOLUTIONS PROVIDER				
Political engagement	IRO-G1-5	SUEZ is politically committed to the resilience and quality of water, the promotion of the circular economy and the energy recovery from waste, which contribute directly to the ecological transition to promote a sustainable future for its consumers.	I+	
SUEZ, AN OPERATOR OF INDUSTRIAL EXCELLENCE				
Protection of whistleblowers	IRO-G1-4	The effective, high-quality handling of potential cases of non-compliance reported via the alert line reinforces a "speak up" culture, and in particular employee confidence in the system.	O	Ensuring respect for universal rights
	IRO-G1-3	Non-treatment or poor treatment of potential cases of non-compliance reported via the hotline would call into question the credibility of SUEZ system.	R	
Corporate culture	IRO-G1-2	A strong corporate culture of ethics and compliance reinforces the sustainability of the Group's financial results.	O	
	IRO-G1-1	The absence or inadequacy of a corporate culture of ethics and compliance would have serious consequences for the Group's reputation and could have potential financial impact.	R	
Corruption and bribery	IRO-G1-6	SUEZ uses a number of means (e-learning tools, presentations, webinars, etc.) to increase its employees' awareness of corruption issues.	I+	
	IRO-G1-7	SUEZ regularly interacts with public sector stakeholders in the course of its activities. In the case of proven acts of active corruption of foreign public official(s), this would correspond to a failure by SUEZ to respect its commitments as well as the international and local laws and regulations applicable to the Group.	I-	
	IRO-G1-8	SUEZ being implicated following a scenario of corruption/ conflicts of interest with public officials is a financial, reputational, and business risk.	R	

I+ Positive Impact I- Negative Impact R Risk O Opportunity

MATERIAL POLICIES

- Ethics Charter
- Practical Guide Ethics in commercial relations
- Practical Guide to Ethics
- Group Policy on Prevention and Management of Conflicts of Interest
- Group Policy on Whistleblowing and Processing of Alerts
- Group Procedure for Patronage and Sponsorship Initiatives
- Third Party Integrity Assessment Procedure
- Group Procedure related to the conclusion of commercial or institutional consultancy agreements
- Group Gifts and Hospitality Policy
- Ethical and Responsible Lobbying Charter

ACTIONS ON MATERIAL IMPACTS

Actions carried out in 2024:

- Training programme for the ethics & compliance officers network (completed in March 2024)
- Updating and drafting of the *Group Gifts and Hospitality Policy* (roll-out started in July 2024, POC register online from October 2024 in France)
- Updating and drafting of the *Group Policy on Whistleblowing and the Processing of alerts* (publication in 2024)
- Updating and drafting the *Group Policy on Prevention and Management of Conflicts of Interest* (publication in 2024)
- E-learning courses available in Talent Up (continuous training)
- Launch of the online training course "Preventing the risks of corruption at SUEZ" (July 2024), compulsory for the Group's managers and supervisors (approximately 14,000 employees) and for new employees
- Training provided by the network of ethics & compliance officers for employees in their Business Units or geographical areas
- Launch of a new internal reporting tool for reporting ethics and compliance KPIs (July 2024)

Objectives for 2025:

- Updating and drafting of the *Group Procedure for Patronage and Sponsorship Initiatives* (roll-out planned for 2025)
- Updating and drafting of the consolidated 2022 risk mapping (to be revised in 2025)
- Drafting of an internal investigation guide for the ethics and compliance officers network

12.1.2. Business conduct policies and corporate culture (G1-1)

The term *"business conduct"* here refers to the set of values, ethical principles, and compliance standards of SUEZ, as defined by its Charter and policies, which are applied in its daily operations, decision-making, and risk management.

SUEZ adherence to social and environmental standards, particularly legal obligations regarding human rights, working conditions, environmental impact, and other sustainability aspects discussed in the previous sections will not be addressed in this paragraph.

SUEZ Corporate culture

At SUEZ, corporate culture is established, developed, promoted, and evaluated through a variety of detailed approaches and structured initiatives. SUEZ anchors universal values and ethical principles outlined in the *Ethics Charter*, supported by strong managerial involvement and a dissemination process throughout the Group (IRO-G1-2).

SUEZ Ethics Charter

The *Ethics Charter* of SUEZ establishes its core values, providing a shared foundation for daily collective and individual actions and behaviours. The *Ethics Charter*, revised in October 2022, is mandatory for all employees and entities within the Group.

The *Ethics Charter* defines the ethical principles of SUEZ:

- **for all employees:** The employees are the guardians of the ethical values of SUEZ, which they must respect in all circumstances. They all have an absolute duty never to act in a way that could cast the slightest doubt on the ethical integrity of SUEZ.

  Working in a healthy climate helps SUEZ to operate effectively. This is why SUEZ has taken the necessary steps to ensure its employees have a safe working environment. SUEZ also fosters a climate of respect and trust in relations with its employees. This human and ethical requirement also applies to all its shareholders, for which SUEZ seeks to provide the highest standards of corporate governance;
- **for all customers, suppliers, partners, and competitors:** SUEZ requires its business partners, subcontractors and suppliers to adopt ethical, environmental, and corporate rules, if they have not already done so, as well as to act in a way that is compatible with their values. The employees of SUEZ are expected to be loyal and demonstrate fairness and impartiality in negotiations.

  SUEZ also respects rules of competition, irrespective of the country in which it is operating. As such, it complies with the rules of competition and those of the regulated markets by behaving fairly. It protects notably its confidential information and trade secrets;
- **for all communities:** SUEZ business activities place it right at the heart of the communities where it operates; it attributes great importance to supporting its host communities. SUEZ recognises integrity as one of the founding principles of its ethics. It disapproves corruption in all forms and ensures that the employees responsible for making sure that this principle is respected are not subject to discrimination. All employees must make SUEZ ethical and compliance principles and values an integral part of the way they carry out their work. In that respect, SUEZ has a zero-tolerance policy on corruption.

A Management system defining responsibilities at all levels

A strong managerial involvement

The impetus for the ethical commitment of SUEZ comes from the highest level, namely the CEO and the Executive Committee, who have decided to create the necessary structures within the Group. The Board of Directors and the CSR committee ensure that there is a corruption prevention plan and that it is implemented throughout the Group. This Committee ensures, among other things, that necessary procedures and ethical benchmarks have been implemented. The role of the General Counsel and the Group Director Ethics and Compliance is to integrate compliance and ethics into the vision, strategy, management and practices of SUEZ. In order to ensure that the compliance policies and tools needed to manage SUEZ ethical and compliance risks are deployed and effective, it coordinates a global network of Ethics and Compliance Officers (ECO), the latter having a network of Ethics and Compliance Correspondents (ECC), both of them aiming at notably supervising and rolling out the ethics and compliance programmes within the different business units (BU)/entities of SUEZ.

The dissemination process

Although every employee of SUEZ must uphold its ethics and compliance values and principles, managers have particular obligations, including providing resources to the ECO or ECC in the network, being exemplary in all circumstances, communicating, raising awareness, training and monitoring.

SUEZ has set up reporting, information and internal audit procedures, which also form part of the internal organisation designed to ensure compliance with ethics and compliance values and principles.

Practical Guides

The principles outlined in the *Ethics Charter* are complemented by the *Practical Guide to Ethics* and the *Practical Guide Ethics in commercial relations*, both endorsed by the CEO of SUEZ. These guides were put in place to reaffirm the values and guide employees in their implementation on the ground.

The *Practical Guide to Ethics* details the application of rules in relations with customers, competitors, partners, suppliers and all SUEZ stakeholders. It covers key ethical issues such as corruption, respect for others, fraud, health and safety, and environmental protection.

The *Practical Guide Ethics in commercial relations* specifically addresses issues related to commercial relationships, including anti-corruption rules, gifts and invitations, and conflicts of interest.

These guides provide examples and practical advice to help employees navigate ethical and compliance dilemmas in their day-to-day work. They emphasise the importance of transparency, fairness, and compliance with laws and regulations.

Other policies

In addition to the guides presented above, SUEZ has developed the following policies to manage positive and negative impacts of Business conduct:

Third Party Integrity Assessment Procedure

SUEZ has implemented a rigorous process for assessing the integrity of third parties with whom it conducts business. This procedure defines the rules and principles of governance that any SUEZ company must observe when considering entering or continuing a business relationship with a third party. It aims to improve knowledge of the third parties with which SUEZ collaborates and, if risk situations are identified, to enable the implementation of effective processing measures and thus prevent potential violations of the law by these third parties that could result in legal, business, and reputational damage.

Group Procedure related to the conclusion of commercial or institutional consultancy agreements

SUEZ has established a specific procedure for engaging consultants, particularly in commercial or institutional fields. This includes strict selection criteria, approval processes, and monitoring requirements. The application of a Group procedure, together with the use of standard forms of agreements, aims to safeguard the interests of SUEZ by strengthening control over this category of third parties considered to be more at risk.

Group Policy on Whistleblowing and the Processing of Alerts

SUEZ has implemented a comprehensive whistleblowing Group policy, accessible to any employee of SUEZ on the Group intranet site, to encourage a "Speak-Up" culture among employees and external stakeholders (IRO-G1-4).

Reports can be submitted internally through various means, including line managers, HR, ECO, ECC, or directly to the Group Director Ethics and Compliance thanks to a dedicated email address ethics@suez.com. External stakeholders can also report via the same address which is available on the website of SUEZ.

Upon receiving a report, the ECO or other authorised persons mentioned above (hereinafter collectively "the Authorised Persons") acknowledge receipt of the report in writing within seven workdays and conducts an admissibility review.

The policy provides for the conditions under which a report shall be deemed to be an alert. If so, investigations are led by the Ethics and Compliance network, at a local or central level, which is separated from the chain of management involved in the matter, with the assistance when needed of either (i) any relevant direction within SUEZ (e.g. HR, etc.), (ii) a specialised law firm/occupational medecine, or (iii) both, if so required.

Otherwise, the report shall be sent to the relevant direction for processing (i.e. HR, Internal Control, etc.).

Within three months of acknowledging receipt of the alert, the whistleblower is notified in writing of the measures taken to assess the accuracy of the allegations. At the end of the investigations, the whistleblower is notified in writing of the results of the investigations and of the closure of the case. Remediation measures, including disciplinary sanctions, may be taken further to the alert.

This system includes protection measures covering whistleblowers by ensuring confidentiality and safeguarding against retaliation. In line with Directive (EU) 2019/1937, they shall not be subject to reprisals, threats or attempts to take such action. No disciplinary action is taken against employees who report in good faith, even if the facts are later found to be inaccurate or inconsequential. Disciplinary measures are only considered in cases of misuse or defamation. These measures also benefit the whistleblower's entourage, in particular any facilitators who helped to raise the alert, colleagues or close relations. SUEZ also offers training to employees on how to use these reporting channels effectively and ensures that ECO are adequately trained.

Overall, this system underscores SUEZ commitment to ethical practices by providing some secured channels for reporting and addressing potential breaches while safeguarding whistleblowers from retaliation.

It should be noted that in addition to the email address (ethics@suez.com), some BU or countries (Asia, South Africa, etc.) have deployed also their own whistleblowing system to meet local legal requirements or resulting from local business decisions. Those additional whistleblowing systems are compatible with the requirements of the Group policy.

Group Policy on Prevention and Management of Conflicts of Interest

SUEZ has implemented a *Group Policy on Prevention and Management of Conflicts of Interest* to ensure transparency and ethical conduct across its operations. This policy applies to all SUEZ entities and defines conflicts of interest as situations where an employee's personal interests may interfere with those of the Company.

The policy outlines procedures for identifying, declaring, and managing conflicts of interest. Employees are required to report potential or actual conflicts to their manager, HR Direction, or ECO/ECC using a standardised declaration form. These declarations are recorded in a register maintained by the ECO.

To address conflicts when confirmed, appropriate measures are taken, such as temporary suspension from certain processes or modification of assignment terms. Managers are responsible for promoting awareness and providing training on conflicts of interest, particularly during annual performance reviews.

The policy ensures compliance with data privacy regulations. It stipulates that failure to declare or providing misleading declarations may result in disciplinary action. This approach reinforces the commitment of SUEZ to maintaining high ethical standards and preserving the integrity of its business operations.

Group Gifts and Hospitality Policy

SUEZ has implemented a policy regarding gifts and hospitality to ensure ethical business practices. The policy outlines clear guidelines on what is permissible and what requires approval, with an emphasis on transparency and avoiding conflicts of interest.

According to this policy, the employees of SUEZ are prohibited from accepting and offering gifts except for promotional "goodies" and "courtesy gifts".

Invitations must be legal under applicable regulations and comply with the ethical and compliance principles of SUEZ.

Group Procedure for Patronage and Sponsorship Initiatives

SUEZ has established a *Group Procedure for Patronage and Sponsorship Initiatives* to ensure these activities align with its strategic and ethical values. All sponsorship and patronage actions must comply with SUEZ internal procedures and the applicable legal, tax and ethical rules, as well as being consistent with the values and commitments of SUEZ. These initiatives are designed to support sustainable development, local engagement, and corporate social responsibility, focusing on areas such as sport, environmental protection and sustainable development, cultural outreach (museums, operas, theatres, etc.), social integration, humanitarian aid and academic partnerships.

The procedure requires that all actions be approved by internal committees at either the BU or Group levels depending on specific financial thresholds. Sponsorships and patronage must be formalised in written contracts that outline the terms, duration, and expected outcomes. SUEZ avoids funding any initiatives that could pose ethical, compliance or financial risks. Are notably strictly prohibited, financing political activities or parties, even if permitted under local legislation.

This structured approach ensures that all patronage and sponsorship activities reflect the commitment of SUEZ to ethical conduct and strategic objectives.

Training on business conduct, including anti-corruption and anti-bribery programme

The commitment of SUEZ to ethical business practices is further supported by its ongoing efforts to train employees on compliance issues and by maintaining a culture of integrity across all levels of the organisation (IRO-G1-6).

In 2023, the Executive Committee of SUEZ decided to update its anticorruption training provided through an e-learning via its internal HR learning platform ("Talent Up").

This new e-learning titled "Prevent corruption risks at SUEZ" was launched in July 2024. This new training – that any employees of SUEZ may follow – is mandatory for management and supervisory staff (approx. 14.000 employees) and has been incorporated into the onboarding process for any new employee, in addition to the pre-existing e-learning course "What is ethics at SUEZ". The completion of this e-learning is contingent upon passing a knowledge test. Additionnally, for the very first time, an Ethics and Compliance Week was organized early January 2025, providing awareness materials on the following content: third party assessment, whistleblower, conflict of interest and patronage and sponsorship. This content was available for all employees including part-time staff and trainees.

By the end of 2024, approximately 70% of managers and supervisors completed the e-learning "Prevent corruption risk at SUEZ".

The following training programmes are also available to employees of SUEZ employees via the platform mentioned above:

- "Ethics in commercial relations", to give employees the keys to detect risky situations, make the right decisions and act appropriately "Whistleblowing with confidence", to learn about their legal rights and responsibilities when making a report, how and to whom you can report wrongdoing and what protection you have when doing so;
- "Ethics and Compliance", to underline the ethics and compliance values and principles of SUEZ and the procedures and policies implemented to enforce these values and principles.

With respect to the Ethics and Compliance network, a comprehensive training programme was launched end of 2023 for the ECO with the assistance of an external law firm. This training was completed in March 2024.

Furthermore, SUEZ is currently conducting a review of the categories of individuals more specifically exposed to the risk of corruption, aiming at providing them with a specific and dedicated training programme. The risk mapping update exercise will help specify those categories.

Regarding the top executives of SUEZ, several awareness or training sessions on ethics and compliance matters took place along the year 2024 (e.g. sessions provided to the Top 40 managers, training sessions given to most of the Executive Committees within the French BU and entities, dedicated presentations given to the members of the Executive Committees of the Middle Eastern, African, Moroccan, European and Central Asian BU).

12.1.3. Management of relationships with suppliers (G1-2)

SUEZ strives to maintain respectful and balanced relationships with its suppliers and subcontractors, treat them with equity and impartiality, and enhance a culture of integrity. The Group's management of supplier relationships is based on three main pillars:

1. **innovation partnerships:** contributing to integrating suppliers into new services and the circular economy;
2. **enhanced competitiveness:** optimising resources across multiple aspects such as energy consumption, carbon emissions, and raw material reuse;
3. **local development:** contributing to the development of regions where SUEZ operates by supporting SMEs and promoting diversity among suppliers in the social and solidarity economy, economic inclusion, and disability sectors.

Supplier selection and evaluation

SUEZ incorporates CSR criteria into its supplier selection process, which can represent up to 30% of the evaluation. The CSR criteria include governance, human rights, environment and health and safety. The Group also conducts on-site audits that include environmental and health-safety aspects. SUEZ has implemented a *Third-Party integrity assessment procedure* to evaluate and manage risks related to corruption, influence peddling, money laundering, terrorist financing, and non-compliance with international sanctions.

Supplier engagement

SUEZ expects its suppliers to adhere to the principles of the UN Global Compact and respect international labour conventions. The Group encourages suppliers to adopt responsible practices in human rights, working conditions, environment, and anti-corruption. Suppliers are required to sign the SUEZ Code of Ethics and validate the SUEZ ethical and/or compliance contractual clause.

Prevention of late payments

SUEZ is committed to preventing late payments, particularly for SMEs. The Group's policy is that all payment deadlines must be ensured by accountants, purchasers and procurement partners. Where commitments are not fulfilled, appropriate remedies must be applied.

12.1.4. Prevention and detection of corruption and bribery (G1-3)

Corruption and influence peddling represent major risks that may expose SUEZ, its employees and managers to civil and criminal sanctions that can seriously damage its reputation.

The fight against corruption and influence peddling is therefore fully integrated into the governance of SUEZ.

In that respect, SUEZ has a zero-tolerance policy on corruption. As a result, anti-corruption procedures are embedded in SUEZ business conduct practices. SUEZ has implemented a comprehensive system to prevent, detect, investigate, and respond to allegations or incidents relating to corruption. This system is underpinned by the *Ethics Charter* and complemented by specific procedures and training programmes, both detailed in ⩥ section *11.1.2 Business conduct policies and corporate culture*.

The implementation of the ethics and compliance system is the responsibility of the General Counsel of SUEZ with the support of the Group Director Ethics and Compliance, his team, and the global network of ECO and ECC present in the BU and entities.

Procedures for preventing, detecting, and addressing allegations about corruption and bribery (IRO-G1-7 & G1-8)

SUEZ has established robust procedures to prevent, detect, and address allegations or incidents of corruption These procedures are notably included in the following Group policies or procedures, which all cover corruption prevention aspects:

- *Third Party integrity assessment procedure*;
- *Procedure related to the conclusion of commercial or institutional consultancy agreements*;
- *Policy on Prevention and Management of Conflicts of Interest*;
- *Policy on Whistleblowing and the Processing of Alert*;
- *Policy on Gifts and Hospitality*;
- *Procedure for patronage and sponsorship initiatives*.

These procedures are detailed in ⩥ section *12.1.2 Business conduct policies and corporate culture*. They are introduced to every new employee of SUEZ employee during the onboarding process and are available on SUEZ intranet.

As explained above in ⩥ section *12.1.2 Business conduct policies and corporate culture*, to ensure compliance with ethical values, SUEZ has established an ethics alert system (including the email address "ethics@suez.com") that allows employees (including temporary workers and interns) and external stakeholders, including customers, partners, suppliers, and shareholders, to report concerns confidentially.

Furthermore, internal control and audit teams are also participating in the identification of possible breaches of ethics and compliance values and principles in the context of either their controls or audit missions.

Reports – when corresponding to an admissible alert – are processed promptly and confidentially, as further described in ⩥ section *12.1.2 Business conduct policies and corporate culture*.

As far as the internal reporting is concerned, based notably on the information gathered from the global Ethics and Compliance network, the General Counsel and the Group Director Ethics and Compliance report annually to the Executive Committee and the CSR Committee the roadmap for the coming year and a review of the past year, including in particular relevant information on the number of incidents, the number of sanctions and the major investigations that have been carried out on topics related to ethics and compliance.

Training on prevention and detection of corruption and bribery (IRO-G1-6)

SUEZ offers a comprehensive anti-corruption training programme, included in the global business conduct training described in ⩥ section *12.1.2 Business conduct policies and corporate culture*.

12.2. Metrics and targets

12.2.1. Incidents of corruption or bribery (G1-4)

In 2024, neither SUEZ, nor any of its subsidiaries were subject to any convictions related to corruption, bribery, or influence peddling under applicable laws and regulations.

As mentioned above in ⩥ section *12.1.2 Business conduct policies and corporate culture*, any breach of the ethics and compliance values and principles of SUEZ gives rise to in-depth investigations. If the investigations confirm that the breach is characterised, remediation measures may be implemented (such as disciplinary sanctions, amendment of procedures, strengthening of internal controls, etc.)

12.2.2. Political influence and lobbying activities (G1-5)

SUEZ has implemented a comprehensive approach to political influence and lobbying activities, guided by its *Ethical and Responsible Lobbying Charter*.

The Group maintains a policy of refraining from funding political activities, even in countries where such practices may be legally permitted. This approach underscores the Company's commitment to political neutrality and ethical business conduct.

Institutional relations (or "lobbying") aim at creating optimal conditions for the development of the activities of SUEZ, whilst respecting the environment and the general interest. In the light of the experience of SUEZ, our role is to give guidance on the consequences and practical impacts of the legislation and future public policies at local, national, European and international levels. SUEZ also brings technical expertise, in a long-lasting and constructive manner. More broadly, the Public Affairs team carries the Group's messages to institutions and various professional federations, associations and public organisations, which includes a presence in different institutional events (Salon des Maires in France, European Round Tables, World Water Forum...). To this end, the Group is a member of several waste management and recycling organisations, water management organisations and cross sectoral and business federations, as described in the table below:

Waste Management and Recycling Organisations
European Federation of Waste Management and Environmental Services (FEAD)*
European Recycling Industries' Confederation (EURIC)*
Plastic Recyclers Europe (PRE)*
Confederation of European Waste-to-Energy Plants (CEWEP)*
European Biogas Association (EBA)
International Solid Waste Association (ISWA)
ERFO*
FNADE, FEDEREC, FEDENE, INEC, ASTEE, ATEE, AMORCE, ASPRODET, SYVED

Water Management Organisations
EUREAU*
Water Europe
European Innovation Partnership on Water
MEP Water group
European Sustainable Phosphorus Platform
AQUAFED*
International Water Association (IWA)*
World Water Council
Acqueau, FP2E, UIE, Synteau, ASTEE, AMORCE

Cross Sectoral and Business Federations
E3PO*
France Industrie
Medef*
Afep
ESPP (phosphorus platform)
Healthy Europe

Think-Tanks, Associations and Platforms
EPR Club
EIT Raw Materials
CEN Strategic Advisory Body on Environment (SABE)*
European Policy Center (EPC)
Fondation Jean Jaurès, Fondapol, Institut Montaigne, Terra Nova
CSF Eau, CSF Déchets
Entreprises pour l'Environnement (EpE), Pacte Mondial Réseau France (PMRF), C3D, ORSE

Items marked with an asterisk (*) indicate membership through national associations.

The Director in charge of Public Affairs oversees the Group's lobbying activities, ensuring they adhere to the ethical standards of SUEZ and comply with applicable laws. Members of administrative, management, and supervisory bodies involved in these activities are required to follow the Group's *Ethics Charter* and related policies.

Transparency is a key principle in the lobbying efforts of SUEZ. The Company is registered with both the EU Transparency Register and the French High Authority for Transparency in Public Life ("HATVP") [1] SUEZ EU Transparency Register identification number is 27799842497-69. Each year, the Group publicly discloses its lobbying expenses for both French national authorities and EU representative authorities. This information is available on the HATVP website [2], as mandated by the Sapin II law, and through the EU Transparency Register [3]. In 2023, lobbying expenses for French national authorities were between €700,000 and €800,000, while those for EU representative authorities ranged from €500,000 to €599,000.

The approach of SUEZ to lobbying demonstrates its dedication to responsible corporate citizenship, aligning its business interests with broader societal and environmental goals while maintaining high ethical standards.

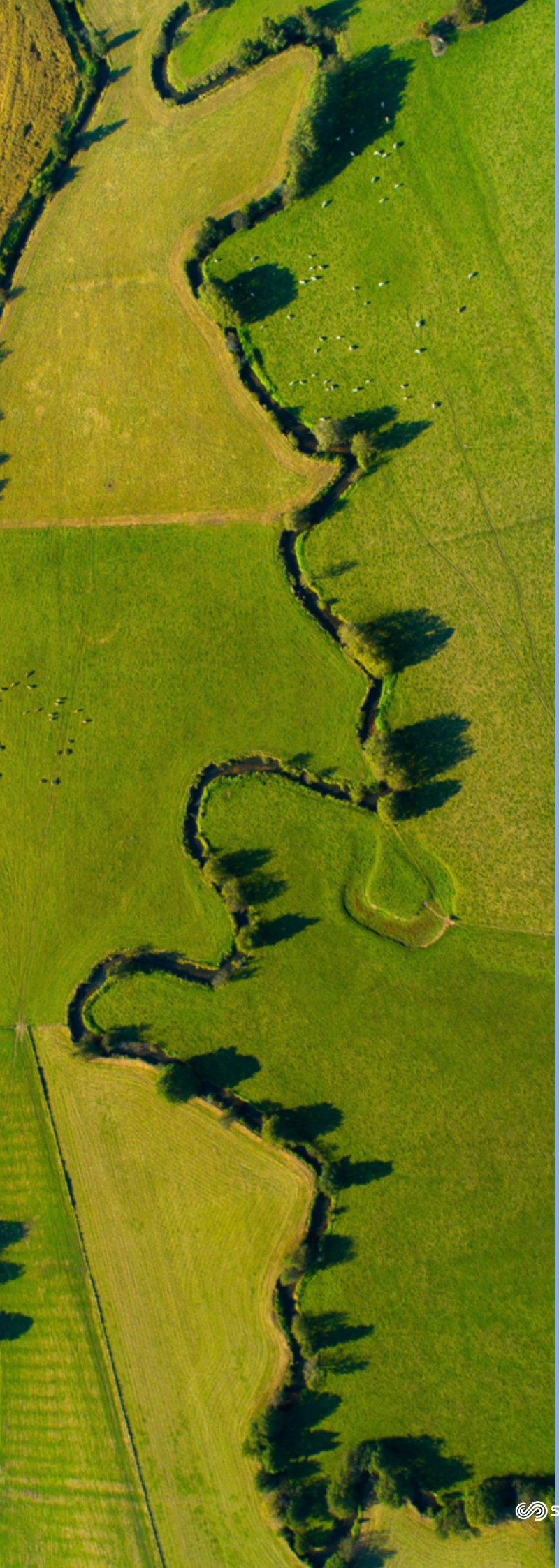
In 2024, there were no new appointments to the Board of Directors. For the existing Board members, none held a comparable position in public administration (including regulators) in the 2 years preceding their most recent appointment.

No political engagement expenses (indirect or direct financial and in kind contributions) were made by SUEZ in 2024.

(1) The EU Transparency Register is a public database listing organisations and individuals engaged in activities aimed at influencing EU policy and decision-making processes. It provides citizens with information about who represents which interests at the EU level and the resources allocated to these activities. Registrants are required to adhere to a Code of Conduct that governs their interactions with EU institutions, ensuring ethical and transparent lobbying practices.

(2) https:/www.hatvp.fr/fiche-organisation/?organisation=901644989##

(3) https:/transparency-register.europa.eu/searchregister-or-update/organisation-detail_fr?id=27799842497-69



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APPENDIX

13.1. Cross-reference tables – ESRS Disclosure Requirements complied with in preparing sustainability statement (IRO-2)

The Group has listed the disclosure requirements it has complied with in preparing the sustainability statement in the table below. Based on its assessment of double materiality, the Group has concluded that all ESRS standards were material. Information concerning material impacts, risks and opportunities, and the way materiality was assessed, is provided in ⩥ section *1.3. Double materiality assessment* of this report.

ESRS	Disclosure Requirement	Section of the Sustainability Report
ESRS E1 – Climate change	E1-1 – Transition plan for climate change mitigation	2.2.2
	E1-2 – Policies related to climate change mitigation and adaptation	2.3.2
	E1-3 – Actions and resources in relation to climate change policies	2.3.3
	E1-4 – Targets related to climate change mitigation and adaptation	2.4.1
	E1-5 – Energy consumption and mix	2.4.2
	E1-6 – Gross Scopes 1, 2, 3 and Total GHG emissions	2.4.3
	E1-7 – GHG removals and GHG mitigation projects	N/A
	E1-8 – Internal carbon pricing	2.4.4
	E1-9 – Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	N/A
ESRS E2 - Pollution	E2-1 – Policies related to pollution	3.1.2
	E2-2 – Actions and resources related to pollution	3.1.3
	E2-3 – Targets related to pollution	3.2.1
	E2-4 – Pollution of air, water and soil	3.2.2
	E2-5 – Substances of concern and substances of very high concern	3.2.3
	E2-6 – Anticipated financial effects from pollution-related impacts, risks and opportunities	3.2.4
ESRS E3 – Water and marine resources	E3-1 – Policies related to water and marine resources	4.1.1
	E3-2 – Actions and resources related to water and marine resources	4.1.2
	E3-3 – Targets related to water and marine resources	4.2.1
	E3-4 – Water consumption	4.2.2
	E3-5 – Anticipated financial effects from material water and marine resources-related risks and opportunities	N/A

ESRS	Disclosure Requirement	Section of the Sustainability Report
ESRS E4 – Biodiversity and ecosystems	E4-1 – Transition plan and consideration of biodiversity and ecosystems in strategy and business model	5.1.1
	E4-2 – Policies related to biodiversity and ecosystems	5.2.2
	E4-3 – Actions and resources related to biodiversity and ecosystems	5.2.3
	E4-4 – Targets related to biodiversity and ecosystems	5.3.1
	E4-5 – Impact metrics related to biodiversity and ecosystems change	5.3.2
	E4-6 – Anticipated financial effects from biodiversity and ecosystem-related risks and opportunities	N/A
ESRS E5 – Resource use and circular economy	E5-1 – Policies related to resource use and circular economy	6.1.1
	E5-2 – Actions and resources related to resource use and circular economy	6.1.2
	E5-3 – Targets related to resource use and circular economy	6.2.1
	E5-4 – Resource inflows	6.2.2
	E5-4 – Resource outflows	6.2.3
	E5-6 – Anticipated financial effects from resource use and circular economy-related impacts, risks and opportunities	N/A
ESRS S1 – Own workforce	S1-1 – Policies related to own workforce	8.2.1
	S1-2 – Processes for engaging with own workers and workers' representatives about impacts	8.2.2
	S1-3 – Processes to remediate negative impacts and channels for own workers to raise concerns	8.2.3
	S1-4 – Taking action on material impacts and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions and approaches	8.2.4
	S1-5 – Targets related to managing material impacts, advancing positive impacts, as well as to risks and opportunities	8.3.1
	S1-6 – Characteristics of the Undertaking's Employees	8.3.2
	S1-7 – Characteristics of non-employee workers in the undertaking's own workforce	8.3.3
	S1-8 – Collective bargaining coverage and social dialogue	8.3.4
	S1-9 – Diversity metrics	N/A
	S1-10 – Adequate Wages	N/A
	S1-11 – Social protection	N/A
	S1-12 – Persons with disabilities	N/A
	S1-13 – Training and Skills Development metrics	8.3.5
	S1-14 – Health and safety metrics	8.3.6
	S1-15 – Work-life balance	N/A
	S1-16 – Remuneration metrics	N/A
	S1-17 – Incidents, complaints and severe human rights impacts	8.3.7

ESRS	Disclosure Requirement	Section of the Sustainability Report
ESRS S2 – Workers in the value chain	S2-1 – Policies related to value chain workers	9.2.1
	S2-2 – Processes for engaging with value chain workers about impacts	9.2.2
	S2-3 – Processes to remediate negative impacts and channels for value chain workers to raise concerns	9.2.3
	S2-4 – Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those action	9.2.4
	S2-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	9.3.1
ESRS S3 – Affected communities	S3-1 – Policies related to affected communities	10.2
	S3-2 – Processes for engaging with affected communities about impacts	10.3
	S3-3 – Processes to remediate negative impacts and channels for affected communities to raise concerns	10.4
	S3-4 – Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions	10.5
	S3-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	10.6
ESRS S4 – Consumers and end-users	S4-1 – Policies related to consumers and end-users	11.2.1
	S4-2 – Processes for engaging with consumers and end-users about impacts	11.2.2
	S4-3 – Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	11.2.3
	S4-4 – Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions	11.2.4
	S4-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	11.3.1
ESRS G1 – Business conduct	G1-1– Business conduct policies and corporate culture	12.1.2
	G1-2 – Management of relationships with suppliers	12.1.3
	G1-3 – Prevention and detection of corruption and bribery	12.1.4
	G1-4 – Confirmed incidents of corruption or bribery	12.2.1
	G1-5 – Political influence and lobbying activities	12.2.2
	G1-6 – Payment practices	N/A

DATAPOINTS THAT DERIVE FROM OTHER EU LEGISLATION

The table below lists the datapoints in ESRS 2 and topical standards that derive from other EU legislation:

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Section of the Sustainability Report
ESRS 2 GOV-1 Board's gender diversity paragraph 21 (d)	*Indicator number 13 of Table #1 of Annex 1*		*Commission Delegated Regulation (EU) 2020/1816 (5), Annex II*		1.1.1
ESRS 2 GOV-1 Percentage of board members who are independent § 21 (e)			*Delegated Regulation (EU) 2020/1816, Annex II*		1.1.1
ESRS 2 GOV-4 Statement on due diligence § 30	*Indicator number 10 Table #3 of Annex 1*				1.1.3
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities § 40 (d) i	*Indicators number 4 Table #1 of Annex 1*	*Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/245328Table 1: Qualitative information on Environmental risk and Table 2: Qualitative information on Social risk*	*Delegated Regulation (EU) 2020/1816, Annex II*		N/A
ESRS 2 SBM-1 Involvement in activities related to chemical production § 40 (d) ii	*Indicator number 9 Table #2 of Annex 1*		*Indicator number 9 Table #2 of Annex 1*		N/A
ESRS 2 SBM-1 Involvement in activities related to controversial weapons § 40 (d) iii	*Indicator number 9 Table #2 of Annex 1*		*Delegated Regulation (EU) 2020/181829, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II*		N/A
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco § 40 (d) iv			*Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II*		N/A
ESRS E1-1 Transition plan to reach climate neutrality by 2050 § 14				*Regulation (EU) 2021/1119, Article 2(1)*	2.2.2
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks § 16 (g)		*Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book-Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity*	*Delegated Regulation (EU) 2020/1818, Article12.1 (d) to (g), and Article 12.2*		2.2.2

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Section of the Sustainability Report
ESRS E1-4 GHG emission reduction targets § 34	*Indicator number 4 Table #2 of Annex 1*	*Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics*	*Delegated Regulation (EU) 2020/1818, Article 6*		2.2.2
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) § 38	*Indicator number 5 Table #1 and Indicator n. 5 Table #2 of Annex 1*				2.4.2
ESRS E1-5 Energy consumption and mix § 37	*Indicator number 5 Table #1 of Annex 1*				2.4.2
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors § 40 to 43	*Indicator number 6 Table #1 of Annex 1*				2.4.2
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions § 44	*Indicators number 1 and 2 Table #1 of Annex 1*	*Article 449a; Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1:*	*Delegated Regulation (EU) 2020/1818, Article 5(1), 6 and 8(1)*		2.4.3
ESRS E1-6 Gross GHG emissions intensity § 53 to 55	*Indicators number 3 Table #1 of Annex 1*	*Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics*	*Delegated Regulation (EU) 2020/1818, Article 8(1)*		2.4.3
ESRS E1-7 GHG removals and carbon credits § 56				*ESRS E1-7 GHG removals and carbon credits § 56*	N/A
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks § 66			*Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II*		N/A
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk § 66 (a) **ESRS E1-9** Location of significant assets at material physical risk § 66 (c).		*Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraphs 46 and 47; Template 5: Banking book - Climate change physical risk: Exposures subject to physical risk.*			N/A

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Section of the Sustainability Report
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes § 67 (c).		*Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraph 34; Template 2: Banking book -Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral*			N/A
ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities § 69			*Delegated Regulation (EU) 2020/1818, Annex II*		N/A
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, § 28	*Indicator number 8 Table #1 of Annex 1 Indicator number 2 Table #2 of Annex 1 Indicator number 1 Table #2 of Annex 1 Indicator number 3 Table #2 of Annex 1*				3.2.3
ESRS E3-1 Water and marine resources § 9	*Indicator number 7 Table #2 of Annex 1*				4
ESRS E3-1 Dedicated policy § 13	*Indicator number 8 Table 2 of Annex 1*				4.1.1
ESRS E3-1 Sustainable oceans and seas § 14	*Indicator number 12 Table #2 of Annex 1*				N/A
ESRS E3-4 Total water recycled and reused § 28 (c)	*Indicator number 6.2 Table #2 of Annex 1*				4.2.2
ESRS E3-4 Total water consumption in m3 per net revenue on own § 29	*Indicator number 6.1 Table #2 of Annex 1*				4.2.2
ESRS 2- IRO 1 - E4 § 16 (a) i	*Indicator number 7 Table #1 of Annex 1*				5.1.2
ESRS 2- IRO 1 - E4 § 16 (b)	*Indicator number 10 Table #2 of Annex 1*				5.1.2
ESRS 2- IRO 1 - E4 § 16 (c)	*Indicator number 14 Table #2 of Annex 1*				5.1.2
ESRS E4-2 Sustainable land/ agriculture practices or policies § 24 (b)	*Indicator number 11 Table #2 of Annex 1*				5.2.2
ESRS E4-2 Sustainable oceans/ seas practices or policies § 24 (c)	*Indicator number 12 Table #2 of Annex 1*				N/A

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Section of the Sustainability Report
ESRS E4-2 Policies to address deforestation § 24 (d)	*Indicator number 15 Table #2 of Annex 1*				5.2.2
ESRS E5-5 Non-recycled waste § 37 (d)	*Indicator number 13 Table #2 of Annex 1*				6.2.3
ESRS E5-5 Hazardous waste and radioactive waste § 39	*Indicator number 9 Table #1 of Annex 1*				6.2.3
ESRS 2- SBM3 - S1 Risk of incidents of forced labour § 14 (f)	*Indicator number 13 Table #3 of Annex I*				8.1.2
ESRS 2- SBM3 - S1 Risk of incidents of child labour § 14 (g)	*Indicator number 12 Table #3 of Annex I*				8.1.2
ESRS S1-1 Human rights policy commitments § 20	*Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex I*				8.2.1
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, § 21			*Delegated Regulation (EU) 2020/1816, Annex II*		8.2.1
ESRS S1-1 Processes and measures for preventing trafficking in human beings § 22	*Indicator number 11 Table #3 of Annex I*				8.2.1
ESRS S1-1 Workplace accident prevention policy or management system § 23	*Indicator number 1 Table #3 of Annex I*				8.2.1
ESRS S1-3 Grievance/ complaints handling mechanisms § 32 (c)	*Indicator number 5 Table #3 of Annex I*				8.2.3
ESRS S1-14 Number of fatalities and number and rate of work-related accidents/§ 88 (b) and (c)	*Indicator number 2 Table #3 of Annex I*		*Delegated Regulation (EU) 2020/1816, Annex II*		8.3.6
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness/§ 88 (e)	*Indicator number 3 Table #3 of Annex I*				8.3.6
ESRS S1-16 Unadjusted gender pay gap § 97 (a)	*Indicator number 12 Table #1 of Annex I*		*Delegated Regulation (EU) 2020/1816, Annex II*		N/A
ESRS S1-16 Excessive CEO pay ratio § 97 (b)	*Indicator number 8 Table #3 of Annex I*				N/A
ESRS S1-17 Incidents of discrimination paragraph 103 (a)	*Indicator number 7 Table #3 of Annex I*				8.3.7
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD § 104 (a)	*Indicator number 10 Table #1 and Indicator n. 14 Table #3 of Annex I*		*Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12 (1)*		8.3.7
ESRS 2- SBM3 – S2 Significant risk of child labour or forced labour in the value chain § 11 (b)	*Indicators number 12 and n. 13 Table #3 of Annex I*				9.1.2

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Section of the Sustainability Report
ESRS S2-1 Human rights policy commitments § 17	*Indicator number 9 Table #3 and Indicator n. 11 Table #1 of Annex 1*				9.2.1
ESRS S2-1 Policies related to value chain workers § 18	*Indicator number 11 and n. 4 Table #3 of Annex 1*				9.2.1
ESRS S2-1 Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines § 19	*Indicator number 10 Table #1 of Annex 1*		*Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)*		9.2.1
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, § 19			*Delegated Regulation (EU) 2020/1816, Annex II*		9.2.1
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain § 3	*Indicator number 14 Table #3 of Annex 1*				9.2.1
ESRS S3-1 Human rights policy commitments § 16	*Indicator number 9 Table #3 of Annex 1 and Indicator number 11 Table #1 of Annex 1*				10.2.1
ESRS S3-1 Non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines § 17	*Indicator number 10 Table #1 Annex 1*		*Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)*		10.2.1
ESRS S3-4 Human rights issues and incidents § 3	*Indicator number 14 Table #3 of Annex 1*				10.2.4
ESRS S4-1 Policies related to consumers and end-users § 16	*Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex 1*				11.2.1
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines § 17	*Indicator number 10 Table #1 of Annex 1*		*Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)*		11.2.1
ESRS S4-4 Human rights issues and incidents § 35	*Indicator number 14 Table #3 of Annex 1*				11.2.3
ESRS G1-1 United Nations Convention against Corruption § 10 (b)	*Indicator number 15 Table #3 of Annex 1*				12.1.2
ESRS G1-1 Protection of whistle- blowers § 10 (d)	*Indicator number 6 Table #3 of Annex 1*				12.1.2
ESRS G1-4 Fines for violation of anti-corruption and anti-bribery laws § 24 (a)	*Indicator number 17 Table #3 of Annex 1*		*Delegated Regulation (EU) 2020/1816, Annex II)*		12.2.1
ESRS G1-4 Standards of anti- corruption and anti- bribery § 24 (b)	*Indicator number 16 Table #3 of Annex 1*				12.2.1

13.2. Methodological aspects of the EU Taxonomy reporting

13.2.1. Methodology for applying the EU Taxonomy Regulation to SUEZ

13.2.1.1. Methodology for analysing the eligibility of SUEZ activities

Identification and classification of activities covered by the European Taxonomy

The Group has drawn up a correspondence table cross-referencing (1) SUEZ activity matrix, (2) its internal accounting nomenclature, and (3) activity sheets specified in the appendix of the Delegated Act on climate objectives 1 & 2 of 4 June 2021 and its amendments of 27 June 2023 and in the appendix to the Delegated Act on environmental objectives 3.4,5 & 6 of 27 June 2023.

Eligible activities

In accordance with provisions of Article 10 of the "Article 8" Delegated Regulation on sustainability indicators, the 2024 regulatory publication exercise covers the eligibility of activities contributing to climate change mitigation and adaptation but also the eligibility of activities contributing to the sustainable use and protection of water and marine resources, the transition to a circular economy, the pollution prevention and control and the protection and restoration of biodiversity and ecosystems.

Activities contributing to climate mitigation and adaptation are identified in appendices I and II of the Delegated Regulation of 4 June 2021 and in Annexes I and II of the Taxonomy's Amended Climate Delegated Regulation (EU) 2023/2485.

As mentioned in ⩥ section *2.3.3 Actions and resources in relation to climate change policies*, SUEZ is already anticipating climate change and is conducting a project to adapt its assets to climate change. To date, SUEZ is not able to declare CAPEX and OPEX under the adaptation objective as the action plans are not fully deployed yet.

Activities contributing to the sustainable use and protection of water and marine resources, the transition to a circular economy, the pollution prevention and control and the protection and restoration of biodiversity and ecosystems are identified in appendices I, II, III and IV of the Delegated Regulation of 27 June 2023.

WATER ACTIVITIES

SUEZ activities	Activities as described in the delegated acts and its annexes	Codes
Drinking water production & supply	• Construction, extension and operation of water collection, treatment and supply systems • Renewal of water collection, treatment and supply systems • Water Supply	• CCM5.1 • CCM5.2 • WTR2.1
Wastewater collection & treatment (WW)	• Construction, extension and operation of waste water collection and treatment • Renewal of waste water collection and treatment • Urban Waste Water Treatment	• CCM5.3 • CCM5.4 • WTR2.2
Alternative water	• Production of alternative water resources for purposes other than human consumption	• CE2.2
Smart water management	• Provision of IT/OT data driven solutions for leakage reduction	• WTR4.1

The structure of water and wastewater service contracts makes it impossible to separate out revenue corresponding to renewal of the networks. The Group has chosen to allocate the corresponding revenues to water activities eligible for classification under headings CCM5.1 or CCM5.3 only, without taking into account the differentiation between renewal and construction, extension, and operation of water collection, treatment and supply systems.

RECYCLING AND RECOVERY ACTIVITIES

SUEZ activities	Activities as described in the delegated acts and its annexes	Codes
Non hazardous waste collection and transport (incl. transfert stations)	• Collection and transport of non-hazardous waste in source segregated fractions • Collection and transport of non-hazardous and hazardous waste	• CCM5.5 • CE2.3
Waste sorting and recycling	• Material recovery from non-hazardous waste • Sorting and material recovery of non-hazardous waste	• CCM5.9 • CE2.7
Production of waste heat or electricity production from bioenergy	• Electricity generation from bioenergy • Production of heat/cool using waste heat	• CCM4.8 • CCM4.25
Capture and recovery of biogas from landfill sites	• Landfill gas capture and utilisation	• CCM5.10
Sludge methanization	• Anaerobic digestion of sewage sludge	• CCM5.6
Biowaste composting or methanization	• Anaerobic digestion of bio-waste • Composting of bio-waste • Recovery of bio-waste by anaerobic digestion or composting	• CCM5.7 • CCM5.8 • CE2.5
Collection and transport of hazardous waste	• Collection and transport of hazardous waste	• PPC2.1
Treatment of hazardous waste	• Treatment of hazardous waste • Remediation of contaminated sites and areas	• PPC2.2 • PPC2.4 • CE2.4

INDIVIDUAL MEASURES

Within SUEZ, expenses eligible under "individual measures", as defined by the Taxonomy Regulation, correspond to the following activities:

- CCM6.5. Transport by motorbikes, passenger cars and light commercial vehicles;
- CCM6.6. Freight transport services by road;
- CCM7.2./CE3.2. Renovation of existing buildings;
- CCM7.3. Installation, maintenance, and repair of energy-efficient equipment;
- CCM7.5. Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings;
- CCM7.7. Acquisition and ownership of buildings;
- CCM8.1. Data processing, hosting, and related activities;
- CCM8.2. Data-driven solutions for GHG emissions reductions;
- CCM9.2. Research, development and innovation for direct air capture of CO_2.

In order to avoid any double counting, when an activity was eligible for multiple objectives, alignment was assessed for each objective, and the activity was reported under the most relevant one. For example, part of the non hazardous waste collection and transport activity is eligible under both the "climate change mitigation" objective (CCM5.5)and under the "transition to a circular economy" objective (CE2.3) but it was only only reported under the "transition to a circular economy" objective. Transfert stations are only eligible under the "transition to a circular economy" objective and was assessed as such.

Non-eligible activities

Activities not identified in the reference framework as of the date of this report

Based on the method applied by the Group, the activities below do not correspond to the current European Taxonomy, or to the definition of objectives as specified in the June 2020 Regulation.

- Treatment of industrial water.
- Revenue from the invoicing of services (consulting, project management) specific to local contractual frameworks and/or corresponding to one-off services provided by the Group.

These revenue sources derive from activities and business models not covered by the Taxonomy, and specific to the Group's business sector. Furthermore, these activities play a full part in the environmental transition needed to meet international targets for combating climate change and protecting natural capital and water resources.

- Treatment of industrial water enables the Group's customers to benefit from water whose composition and quality are adapted to their manufacturing processes and consumption. These treatment processes are tailored to the needs of each particular industrial sector: food processing, microelectronics, pulp and paper, etc.
- Invoicing for the provision of services on a one-time basis or as part of the contractual framework for the management and operation of water and waste sites is commonplace for the Group, and includes various types of service provision, such as conducting studies, drawing up master plans and modeling in the water sector, engineering projects, environmental consulting assignments, and the collection and processing of data and the design of innovative digital applications for the environmental efficiency of cities and users. These service provisions help maintain or improve the efficiency and effectiveness of water and waste treatment activities, thereby contributing to better management of water resources and protection of natural resources.

Activities excluded from the reference system

Landfill excluding biogas capture and use

Landfill of final not recycled waste replaces uncontrolled dumping of waste whose untreated, unsupervised degradation poses risks to human health and the environment as a result of air, water, and soil pollution. It is therefore an activity that contributes directly to public health in regions.

More specifically, the waste storage solutions offered by SUEZ to its customers in emerging countries initiate environmental management and protection initiatives in areas where waste treatment facilities are still being developed. These solutions take the place of uncontrolled landfills, which are significant sources of methane emissions and industrial accidents.

The Group considers that such activities, which have so far been excluded from the standard, should be included in the European Taxonomy as part of the objective of preventing and reducing pollution, when they contribute to preventing pollution impacting the environment and human health in emerging countries.

Mixed waste collection

In a similar way to strictly separate collection, mixed waste collection, if combined with a thorough downstream sorting process, can also ensure the recovery of a proportion of non-hazardous waste by redirecting some of it to existing recycling and reclamation channels. Moreover, separate collection is not always possible due to specific local conditions, particularly in certain developing countries; a mixed collection process coupled with an efficient sorting system therefore makes for a more circular model.

Non-Hazardous Waste Incineration (excluding downstream activities)

The activity of non-hazardous waste incineration is not currently covered by a Delegated Act.

13.2.1.2. Methodology for analyzing technical alignment review criteria and key arbitration decisions

SUEZ eligible activities were evaluated with regard to the three Technical Review Criteria (TRC) categories:

- activity-specific TRCs, including substantial contribution criteria and activity-specific DNSH criteria;
- generic DNSH criteria, which are applicable in the same way to activities in question;
- minimum safeguards criteria, which must be verified at the Group level.

Specific technical review criteria and arbitration decisions

The tables below set out the information used to qualify the alignment of eligible activities for Climate and Environmental objectives of the EU Taxonomy, and the details of the methodological approach.

Climate change mitigation

Water activities (revenue, CAPEX, OPEX)

	Approach and arbitration decisions
CCM 5.1: Construction, extension and operation of water collection, treatment and supply systems	
CCM 5.3 Construction, extension and operation of wastewater collection and treatment	With regard to average net energy consumption, SUEZ has taken into account in its calculations the energy produced, whether self-consumed or sold. With regard to population equivalents, SUEZ has taken into account in its calculations the capacity corresponding to the pollution load actually treated (based on the biochemical oxygen demand over five days: BOD5) rather than the nominal capacity of the plant.

Waste activities (revenue, CAPEX, OPEX)

	Approach and arbitration decisions
CCM5.5 Collection and transport of non-hazardous waste in source segregated fractions	As the choice of strictly separate collection and treatment of waste is generally the responsibility of the Group's customers (particularly municipal customers), it is not SUEZ responsibility to set out the waste collection and transportation methods. However, the industrial techniques and processes put in place by SUEZ ensure that volumes of mixed waste collected are prepared so that some of it can be redirected to recycling and recovery channels for reuse and recycling. Where identified, those volumes have been included in eligible revenue, OPEX and CAPEX. "Co-mingled" collection is considered separate here. "Co- mingled" flows are recyclable waste flows sent for recovery of materials, but collected and transported together before being sorted a second time prior to processing. For municipal waste collection activities, the proportion of waste collected separately has been identified among the total volumes of waste collected during the year. It should be noted that pre-sorted mixed fractions have been included. The associated financial data have been calculated in proportion to those identified volumes. For industrial collection activities, financial indicators are associated with flow categories: all incoming flows have been considered for eligibility and substantial contribution, excluding unsorted non-hazardous industrial waste. SUEZ accounts for the transportation of sludge and green waste upstream of treatment and recovery through land application or composting under activity CCM5.5, as the flows collected are sorted at source and collected separately.
CCM5.6: Anaerobic digestion of sewage sludge CCM5.7: Anaerobic digestion of bio-waste	In category CCM5.6, SUEZ only considers sludge anaerobic digestion sites for wastewater treatment activities. In the waste management activity, the majority of SUEZ anaerobic digestion treatment plants are fed with biowaste, but some sites are authorized to process sludge. As proportion of the sludge is low in terms of volume, SUEZ decided to include everything in the majority category 5.7 (bio-waste), as details by activity are not available for the financial data requested.
CCM5.8: Composting of bio-waste	SUEZ takes into account all revenue from bio-waste composting facilities in France and in UK, including green waste. For mixed bio-waste and sludge sites, SUEZ will only include the revenue associated with the bio-waste component, and for the associated OPEX and CAPEX, applied pro rata based on revenue.
CCM5.9: Material recovery from non-hazardous waste	SUEZ takes into account all the revenue that may include sorting, processing, and sales of materials. It includes IBA [1] processing activities. Production of SRF or RDF has been excluded. It is important to note that SUEZ has complied with question 68 of the FAQ of 19 December 2022, and, as such, has taken into account only its sorting activities that can be considered as recycling activities, and not only as "pure sorting" activities. To calculate the proportion of waste recycled, SUEZ compares outgoing flows with incoming flows in terms of metric tons per site. The outgoing flows taken into consideration are those that can be considered as secondary raw materials.
CCM5.10: Landfill gas capture and utilisation	In order to encourage investment in biogas capture and recovery infrastructure, the scope of this study also includes landfill sites that are still in commercial operation, indeed such infrastructures are always installed before the landfill ceases operations. The revenue reported for this activity corresponds strictly to the one generated by the sale of energy from landfill gas that has been closed or is still in commercial operation, as well as the associated capital expenditure. SUEZ is not in a position to identify the gas captured from its landfill units still in operation, which moreover represents a non-significant proportion of total quantities captured. The gas is collected via collection networks common to the whole site, which includes the collection facilities of the open units (the minority) and those of the closed units (the majority). In this context, SUEZ has chosen to account for all its landfill gas capture activities in the financial year 2023 considering that gas capture activities offer the significant environmental benefit of avoiding the release of greenhouse gases into the atmosphere.

(1) Incinerator bottom ash.

Energy production

	Approach and arbitration decisions
CCM4.8: Electricity generation from bioenergy	Through its energy-from-waste plants, SUEZ produces electricity from biomass. SUEZ takes into account 50% of revenues from electricity production, corresponding to the biomass share.
CCM4.25: Production of heat/cool using waste heat	SUEZ takes into account all revenue from heat production using waste heat on its facilities in France.

Transition to a circular economy

	Approach and arbitration decisions
CE2.3: Collection and transport of non-hazardous and hazardous waste	SUEZ takes into account only non hazardous waste collection under activity CE2.3. As the choice of strictly separate collection and treatment of waste is generally the responsibility of the Group's customers (particularly municipal customers), it is not SUEZ responsibility to set out the waste collection and transportation methods. However, the industrial techniques and processes put in place by the SUEZ Group ensure that the volumes of mixed waste collected are prepared so that some of it can be redirected to recycling and recovery channels for reuse and recycling. Where identified, those volumes have been included in eligible revenue, OPEX and CAPEX. "Co-mingled" collection is considered separate here. "Co-mingled" flows are recyclable waste flows sent for recovery of materials, but collected and transported together before being sorted a second time prior to processing. For municipal waste collection activities, the proportion of waste collected separately has been identified among the total volumes of waste collected during the year. It should be noted that pre-sorted mixed fractions have been included. The associated financial data have been calculated in proportion to those identified volumes. For industrial collection activities, financial indicators are associated with flow categories: all incoming flows have been considered for eligibility and substantial contribution, excluding unsorted non-hazardous industrial waste. SUEZ accounts for the transportation of sludge and green waste upstream of treatment and recovery through land application or composting under activity CE2.3, as the flows collected are sorted at source and collected separately.
CE2.4: Treatment of hazardous waste (for material recovery)	SUEZ takes into account its WEEE dismantling & treatment activity under activity CE2.4.
CE2.7: Sorting and material recovery of non-hazardous waste	SUEZ takes into account all the revenue that may include sorting, processing, and sales of materials. It includes IBA processing activities. Production of SRF or RDF has been excluded. It is important to note that SUEZ has complied with question 94 of the FAQ of 29 November 2024, and, as such, has taken into account all facilities that only sort waste but do not actually recover.

Pollution prevention and control

	Approach and arbitration decisions
PPC2.1: Collection and transport of hazardous waste	SUEZ strictly complies with the Circular Economy DNSH criteria in its separate collection of sorted waste: Separately collected waste is not mixed in waste storage and transfer facilities with other waste or materials with different properties. Recyclable waste is not disposed of, incinerated or co-incinerated.

Individual measures (CAPEX, OPEX)

Due to the complexity and diversity of the criteria relating to individual actions, the Group was unable to verify the alignment criteria. As a result, CAPEX and OPEX eligible for individual actions are not aligned.

13.2.1.3. Generic DNSH criteria

DNSH Adaptation

In accordance with Appendix A of Annex 1 of the Delegated Regulation, the Group has verified compliance with the generic DNSH adaptation criteria for all its eligible activities.

The DNSH adaptation criteria require:

- identification of physical climatic risks that could negatively impact the Group's activities;
- evaluation of the vulnerability of activities to these risks according to relevant scenarios linked to the expected duration of activities and use of assets.

Where major risks are identified, evaluation of the adaptation measures and implementation of an adaptation plan.

Analysis of climate resilience and diagnostic of physical risks

To assess exposure to severe physical climate risks, SUEZ used Representative Concentration Pathway (RCP) 4.5 and 8.5 scenarios. These models provided insights into medium- and long-term risks across 2030, 2050, and 2070, particularly in geographies where extreme weather events are projected to intensify.

To achieve this, SUEZ developed a tool for assessing exposure to the 28 hazards described in the European Green Taxonomy. This tool covers all sites operated and insured by SUEZ, enabling the most exposed sites to prepare an adaptation plan in line with its climate change adaptation target.

To assess the vulnerability and associated risks of its sites, SUEZ relied on vulnerability profiles established per activity, thanks to the analysis carried out by consulting firm Carbone 4 using the "OCARA" (operational climate adaptation and resilience assessment) methodology. Additionally, in 2024, SUEZ developed a vulnerability questionnaire to assess vulnerability at the site level. This questionnaire, designed with the SUEZ HSE Direction, enables a site to quickly identify its weaknesses and strengths, and rapidly draw up an action plan to adapt to climate change.

Defining, implementing, and financing action plans is a priority integrated into the Group's *2023-2027 SD roadmap*. More details on specific actions in 2024 are described in section *2.3.3 Actions and resources in relation to climate change policies.*

Adaptation measures

Thanks to this work, adaptation measures have been identified and sites have been prioritised to pace the implementation of such actions over the coming months and years.

DNSH Protection and restoration of biodiversity and ecosystems

Under the generic DNSH criteria on biodiversity, detailed in Appendix D of Annex 1 of the Delegated Regulation, in accordance with European regulation 2011/92/EU, projects must undergo a preliminary analysis to determine whether an Environmental Impact Assessment (EIA) is required. Depending on the results of the assessment, the project may be exempt. Conversely, if an Environmental Impact Assessment (EIA) is required, the assessment must be carried out and mitigation and compensation measures must be implemented to protect the environment.

The DNSH adaptation criteria also require for sites/operations located in or near biodiversity-sensitive areas (including the Natura 2000 network of protected areas, UNESCO World Heritage sites and KBA, as well as other protected areas), an appropriate assessment, where applicable, has been conducted and based on its conclusions measures are implemented.

All eligible activities of SUEZ (with the exception of waste collection (CCM5.5 and CE2.3)) must comply with this DNSH Biodiversity criteria.

Most facilities built or operated by SUEZ in France have the ICPE classification as environmental protection facilities.

Facilities with the ICPE classification are subject to environmental authorization and registration. They fall into categories of projects subject to environmental assessment or case-by-case review, according to the appendix to Article R. 122-2 of French environmental law (Environment Code). As a result, they are aligned with the DNSH criteria.

For other sites in Europe (ICPE-classified and subject to declaration and sites not classified as ICPE), there are two cases:

- the facility falls into another project category listed in the appendix to Article R. 122-2, and consequently is aligned with the DNSH criteria because it is subject to an environmental assessment or case-by-case review;
- the type of facility is not listed in the Annex to Article R. 122-2, which means that, in the sense of Directive 2011/92/EU, the project is not likely to have any significant impact on the environment, and as such is deemed to satisfy the DNSH criterion.

For activities carried out outside the European Union, BUs have analysed compliance with local regulations (when existing) or international standards.

Concerning biodiversity-sensitive areas, EIAs take protected areas into account, indicating the possible impact of projects on these areas, and suggesting mitigation measures to be implemented where necessary.

Furthermore, in » section *5.1.2 Material impacts, risks and opportunities and their interaction with strategy and business model*, SUEZ has identified the sites located in or near these zones. These sites are covered by a voluntary biodiversity action plan. Prior to the implementation of the CSRD, SUEZ had already undertaken an analysis as part of its *Sustainable Development Roadmap 2023-2027* to establish a list of priority sites relevant to biodiversity and ecosystems. The objective was to concentrate the Group's efforts on sites where actions could yield the most significant benefits. The criteria and methodology used in this analysis are detailed in » section *5.1.2 Material impacts, risks and opportunities and their interaction with strategy and business model*.

DNSH Sustainable use and protection of water and marine resources

Following the example of biodiversity due diligence, the generic DNSH criteria for water, whose requirements are detailed in Appendix B, follows the same approach: in accordance with Directive 2011/92/3U, the Environmental Impact Assessment (EIA) identifies, describes, and evaluates the environmental effects of projects likely to have a significant impact on the environment. The Environmental Impact Assessment (EIA) must include a water impact assessment in accordance with Directive 2000/60/EC.

SUEZ water and waste activities aligned are subject to and comply with the DNSH Water criteria, see » section on DNSH Biodiversity.

13.2.1.4. Minimum safeguards

In accordance with guidelines concerning the minimum safeguards described in Article 4 of the Taxonomy Regulation, economic activities contributing substantially to one of the six objectives and complying with the relevant generic and specific DNSH criteria must also implement procedures to align themselves with the OECD Guidelines for Multinational Enterprises and the UN Guidelines on Business and Human Rights (including the principles and rights set out in the eight core conventions listed in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the International Bill of Human Rights).

The "Final Report on Minimum Safeguards" published by the European Sustainable Finance Platform in October 2022 clarified the scope of requirements to be met as part of that first alignment process. The report highlights four areas which must be covered by minimum safeguards: human rights (including worker and consumer rights), corruption, taxation, and competition law. The Group's compliance with minimum safeguards has been analysed in the light of the non-alignment criteria proposed in that report. These criteria are designed to ensure that the Group has not been at the origin of any violations of rights and regulations in those four areas, and that procedures are in place within the Group to identify, assess, avoid, and mitigate any such violations.

The Group's review of minimum safeguards was carried out centrally via workshops with the relevant directions. In light of these analyses, the Group has concluded that the minimum safeguards are met, based on the following guidelines:

Human rights

SUEZ is committed to respecting and promoting recognized human rights and fundamental freedoms. Details of SUEZ initiatives to support the respect and promotion of human rights are detailed in ⩥ sections *8.2.1 Policies related to own workforce* and *9.2.1 Policies related to value chain workers*.

The Group has not been condemned for any human rights violations. No referrals have been accepted by an OECD National Contact Point (NCP), and no allegations have been made against the Group and published on the Business and Human Rights Resource Center (BHRRC) website.

As described in ⩥ section *10.2.3 Processes to remediate negative impacts and channels for affected communities to raise concern*, in 2024, SUEZ has also published its Vigilance plan covering the activities of all its subsidiaries for 2024, available on its website.

Fighting corruption

The Group and its executives have not been condemned for any corruption offenses.

Anti-corruption procedures are in place within the Group and are described in ⩥ section *12.1.2 Business conduct policies and corporate culture*.

Best practices in taxation

The Group has not been condemned for any violation of tax law.

The Company considers tax governance and compliance as important elements of oversight, and adequate tax risk management strategies and processes are in place. Managing those risks is part of the Enterprise Risk Management (ERM) process described in ⩥ section *1.1.4 Risk management and internal controls over sustainability reporting*.

Competition law

SUEZ has not been condemned for non- compliance with competition law.

The Company makes its employees aware of the importance of complying with applicable competition laws and regulations, as set out in ⩥ section *12.1.2 Business conduct policies and corporate culture* in the paragraph on the *Ethics Charter*.

13.2.2. Methodology for identifying and calculating indicators in SUEZ Taxonomy report

The financial information used for this analysis was subject to additional reporting as part of the annual accounts closing process. They have been analysed and checked jointly by local and central teams, to ensure consistency with consolidated revenue, capital expenditure (CAPEX), and operating expenditure (OPEX) for the financial year 2024.

13.2.2.1. Turnover

Presentation of the indicator

The eligible revenue indicator corresponds to the sum of consolidated net revenue generated by Taxonomy-eligible activities divided by the total consolidated net revenue of SUEZ for the financial year 2024.

The aligned revenue corresponds to the sum of consolidated net revenue generated by Taxonomy-eligible and aligned activities, i.e. activities that both correspond to the definition of Taxonomy activity and meet all the technical criteria, divided by the total consolidated net revenue of SUEZ in the financial year 2024.

Numerator

The eligible and aligned numerator corresponds to the sum of consolidated net revenue generated by the proportion of revenue derived from products and services associated with economic activities eligible and aligned with the Taxonomy. The identification of eligible and aligned revenue was carried out in consultation with technical and financial teams.

Denominator

The denominator of the revenue eligibility and alignment indicators is based on consolidated revenue for the year.

Accounting principles applied to consolidated revenue can be reconciled with financial statements.

The definition of revenue is detailed in note 1.5 of the Group's 2024 financial statements.

Regulatory tables

TAB 1: PROPORTION OF TURNOVER FROM PRODUCTS OR SERVICES ASSOCIATED WITH TAXONOMY-ALIGNED ECONOMIC ACTIVITIES – DISCLOSURE COVERING YEAR 2024

Financial year N		2024		Substantial Contribution Criteria						DNSH criteria ("Does Not Significantly Harm")(h)									
Economic Activities (1)	Code (2)	Turnover (3)	Proportion of Turnover, year N (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity (10)	Climate Change Mitigation (11)	Climate Change Adaptation (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)	Minimum safeguards (17)	Proportion of Taxonomy aligned (A.1.) or eligible (A.2.) turnover, year N-1 (18)	Category enabling activity (19)	Category transitional activity (20)
		M€	%	Y/N* N/EL**	Y/N* N/EL**	Y/N* N/EL**	Y/N* N/EL**	Y/N* N/EL**	Y/N* N/EL**	Y/N*	Y/N*	Y/N*	Y/N*	Y/N*	Y/N*	Y/N*	%	E	T
A. Taxonomy-eligible activities																			
A.1. Environmentally sustainable activities (Taxonomy-aligned)																			
Electricity generation from bioenergy	CCM4.8	75.1	0.8%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y		Y	Y	0.8%		
Production of heat/cool using waste heat	CCM4.25	29.9	0.3%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y		Y	Y	Y	Y	0.4%		
Construction, extension and operation of water collection, treatment and supply systems **Water Supply (France, Italy and ECA)**	CCM5.1; **WTR2.1**	346.8	3.8%	N	N/EL	Y	N/EL	N/EL	N/EL	Y	Y	Y			Y	Y	-		
Construction, extension and operation of water collection, treatment and supply systems (Asia) **Water Supply**	**CCM5.1;** WTR2.1	98.1	1.1%	Y	N/EL	N	N/EL	N/EL	N/EL	Y	Y	Y			Y	Y	5.4%		
Construction, extension and operation of waste water collection and treatment **Urban Waste Water Treatment (ECA and Italy)**	CCM5.3; **WTR2.2**	104.0	1.1%	N	N/EL	Y	N/EL	N/EL	N/EL	Y	Y	Y	Y		Y	Y	-		
Construction, extension and operation of waste water collection and treatment (France) **Urban Waste Water Treatment**	**CCM5.3;** WTR2.2	104.1	1.1%	Y	N/EL	N	N/EL	N/EL	N/EL	Y	Y	Y	Y		Y	Y	1.5%		
Collection and transport of non-hazardous waste in source segregated fractions; **Collection and transport of non-hazardous waste**	CCM 5.5; **CE 2.3**	423.0	4.6%	N	N/EL	N/EL	N/EL	Y	N/EL	Y	Y			Y		Y	3.8%		
Anaerobic digestion of sewage sludge	CCM5.6	0.8	0.0%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.0%		
Anaerobic digestion of bio-waste; **Recovery of bio-waste by anaerobic digestion or composting**	CCM 5.7; **CE 2.5**	22.5	0.2%	N	N/EL	N/EL	N/EL	Y	N/EL	Y	Y	Y	Y		Y	Y	0.2%		
Composting of bio-waste; **Recovery of bio-waste by anaerobic digestion or composting**	CCM 5.8; **CE2.5**	74.6	0.8%	N	N/EL	N/EL	N/EL	Y	N/EL	Y	Y		Y		Y	Y	0.7%		
Material recovery from non-hazardous waste; **Sorting and material recovery of non-hazardous waste**	CCM5.9; **CE2.7**	1,616.0	17.6%	N	N/EL	N/EL	N/EL	Y	N/EL	Y	Y				Y	Y	17.4%		
Landfill gas capture and utilisation	CCM5.10	89.5	1.0%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y		Y		Y	Y	1.2%		
Collection and transport of hazardous waste	PPC2.1	36.9	0.4%	N/EL	N/EL	N/EL	Y	N/EL	N/EL		Y	Y		Y	Y	Y	-		
Collection and transport of non-hazardous and hazardous waste	CE2.3	215.5	2.3%	N/EL	N/EL	N/EL	N/EL	Y	N/EL		Y	Y	Y			Y	-		
Treatment of hazardous waste	**PPC2.2;** CE 2.4	34.0	0.4%	N/EL	N/EL	N/EL	Y	N	N/EL		Y	Y			Y	Y	-		
Treatment of hazardous waste	PPC2.2	132.9	1.4%	N/EL	N/EL	N/EL	Y	N/EL	N/EL		Y	Y			Y	Y	-		
Depollution and dismantling of end-of-life products	CE 2.4	5.3	0.1%	N/EL	N/EL	N/EL	N/EL	Y	N/EL	Y	Y	Y	Y		Y	Y	-		

* *Yes/No.*

** *Non-eligible/eligible.*

Financial year N		2024		Substantial Contribution Criteria						DNSH criteria ("Does Not Significantly Harm")(h)									
Economic Activities (1)	Code (2)	Turnover (3)	Proportion of Turnover, year N (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity (10)	Climate Change Mitigation (11)	Climate Change Adaptation (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)	Minimum safeguards (17)	Proportion of Taxonomy aligned (A.1.) or eligible (A.2.) turnover, year N-1 (18)	Category enabling activity (19)	Category transitional activity (20)
		M€	%	Y/N* N/EL**	Y/N* N/EL**	Y/N* N/EL**	Y/N* N/EL**	Y/N* N/EL**	Y/N* N/EL**	Y/N*	Y/N*	Y/N*	Y/N*	Y/N*	Y/N*	Y/N*	%	E	T
Sorting and material recovery of non-hazardous waste	CE2.7	10.4	0.1%	N/EL	N/EL	N/EL	N/EL	Y	N/EL		Y		Y		Y	Y	-		
Remediation of contaminated sites and areas	PPC2.4	1.0	0.0%	N/EL	N/EL	N/EL	Y	N/EL	N/EL	Y	Y	Y		Y	Y	Y	-		
Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1)		**3,420.5**	**37.2%**	**4.3%**	**0.0%**	**4.9%**	**2.2%**	**25.8%**	**0.0%**	**Y**	**Y**	**Y**	**Y**	**Y**	**Y**	**Y**	**31.4%**		
Of which Enabling			**%**	**%**	**%**	**%**	**%**	**%**	**%**	**Y**	**Y**	**Y**	**Y**	**Y**	**Y**	**Y**	**%**	**H**	
Of which Transitional			**%**	**%**						**Y**	**Y**	**Y**	**Y**	**Y**	**Y**	**Y**	**%**		**T**
A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (g)																			
Electricity generation from bioenergy	CCM4.8	0.3	0.0%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.4%		
Production of heat/cool using waste heat	CCM4.25	29.9	0.3%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								-		
Construction, extension and operation of water collection, treatment and supply systems **Water Supply (France, Italy and ECA)**	CCM5.1; **WTR2.1**	862.2	9.4%	EL	N/EL	EL	N/EL	N/EL	N/EL								-		
Construction, extension and operation of water collection, treatment and supply systems (Asia) **Water Supply**	**CCM5.1;** WTR2.1	23.1	0.3%	EL	N/EL	EL	N/EL	N/EL	N/EL								9.1%		
Construction, extension and operation of waste water collection and treatment **Urban Waste Water Treatment (ECA and Italy)**	CCM5.3; **WTR2.2**	146.0	1.6%	EL	N/EL	EL	N/EL	N/EL	N/EL								-		
Construction, extension and operation of waste water collection and treatment (France) **Urban Waste Water Treatment**	**CCM5.3;** WTR2.2	1,065.5	11.6%	EL	N/EL	EL	N/EL	N/EL	N/EL								14.4%		
Collection and transport of non-hazardous waste in source segregated fractions; **Collection and transport of non-hazardous waste**	CCM 5.5; **CE 2.3**	16.3	0.2%	EL	N/EL	N/EL	N/EL	EL	N/EL								0.3%		
Material recovery from non-hazardous waste; **Sorting and material recovery of non-hazardous waste**	CCM5.9; **CE2.7**	21.4	0.2%	EL	N/EL	N/EL	N/EL	EL	N/EL								0.3%		

* *Yes/No.*

** *Non-eligible/eligible.*

Financial year N		2024		Substantial Contribution Criteria						DNSH criteria ("Does Not Significantly Harm")(h)									
Economic Activities (1)	Code (2)	Turnover (3)	Proportion of Turnover, year N (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity (10)	Climate Change Mitigation (11)	Climate Change Adaptation (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)	Minimum safeguards (17)	Proportion of Taxonomy aligned (A.1.) or eligible (A.2.) turnover, year N-1 (18)	Category enabling activity (19)	Category transitional activity (20)
		M€	%	Y/N* N/EL**	Y/N* N/EL**	Y/N* N/EL**	Y/N* N/EL**	Y/N* N/EL**	Y/N* N/EL**	Y/N*	Y/N*	Y/N*	Y/N*	Y/N*	Y/N*	Y/N*	%	E	T
Landfill gas capture and utilisation	CCM5.10	11.9	0.1%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.1%		
Data-driven solutions for GHG emissions reductions	CCM8.2	3.9	0.0%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								-		
Collection and transport of hazardous waste	PPC2.1	31.2	0.3%	N/EL	N/EL	N/EL	EL	N/EL	N/EL								0.8%		
Collection and transport of non-hazardous and hazardous waste	CE2.3	0.8	0.0%	N/EL	N/EL	N/EL	N/EL	EL	N/EL								2.5%		
Treatment of hazardous waste	**PPC2.2;** CE 2.4	13.7	0.1%	N/EL	N/EL	N/EL	EL	EL	N/EL								0.5%		
Treatment of hazardous waste	PPC2.2	7.0	0.1%	N/EL	N/EL	N/EL	EL	N/EL	N/EL								1.4%		
Depollution and dismantling of end-of-life products	CE 2.4	-	0.0%	N/EL	N/EL	N/EL	N/EL	EL	N/EL								0.2%		
Sorting and material recovery of non-hazardous waste	CE2.7	-	0.0%	N/EL	N/EL	N/EL	N/EL	EL	N/EL								0.1%		
Production of alternative water resources for purposes other than human consumption	CE2.2	1.2	0.0%	N/EL	N/EL	N/EL	N/EL	EL	N/EL								0.0%		
Provision of IT/OT data-driven solutions for leakage reduction	WTR4.1	10.2	0.1%	N/EL	N/EL	EL	N/EL	N/EL	N/EL								0.1%		
Turnover of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		**2,244.5**	**24.4%**	**12.3%**	**0.0%**	**11.1%**	**0.6%**	**0.4%**	**0.0%**								**30.5%**		
A. Turnover of Taxonomy eligible activities (A.1+A.2)		**5,665.0**	**61.6%**	**16.7%**	**0.0%**	**16.0%**	**2.8%**	**26.2%**	**0.0%**								**62.0%**		
B. Taxonomy-non-eligible activities																			
Turnover of Taxonomy-non-eligible activities		3,524.1	38.4%																
TOTAL (A. + B.)		9,189.2	100.0%																

* *Yes/No.*

** *Non-eligible/eligible.*

TAB 2: PROPORTION OF TURNOVER FROM PRODUCTS OR SERVICES ASSOCIATED WITH TAXONOMY-ALIGNED ECONOMIC ACTIVITIES PER ENVIRONMENTAL OBJECTIVE – DISCLOSURE COVERING YEAR 2024

	Proportion of turnover/Total turnover	
	Taxonomy-aligned per objective	Taxonomy-eligible per objective
CCM	29%	56%
CCA	0%	0%
WTR	5%	30%
CE	26%	27%
PPC	2%	3%
BIO	0%	0%

13.2.2.2. Capital expenditure (CAPEX)

Presentation of the indicator

The CAPEX indicator includes an eligibility ratio and an alignment ratio. Those two ratios are defined respectively as Taxonomy-eligible CAPEX (numerator) divided by total CAPEX (denominator), and Taxonomy-aligned CAPEX (numerator) divided by total CAPEX (denominator).

The CAPEX considered for the analysis of eligibility and alignment with the European Taxonomy are not part of a CAPEX plan.

Numerator

The numerators of the ratios include capital expenditure linked to the associated assets or processes, i.e.:

- activities that are eligible (for the eligibility ratio), or aligned (for the alignment ratio) with the Taxonomy;
- "purchase" of products from activities that are eligible (for the eligibility ratio) and aligned (for the alignment ratio) with the Taxonomy under individual measures.

Denominator

Total CAPEX, the common denominator of the two ratios, comprises acquisitions of tangible and intangible fixed assets during the year, before depreciation and amortization and excluding changes in fair value. It includes acquisitions of fixed assets (IAS 16), intangible assets (IAS 38), new concession work (IFRIC 12) for models classified as intangible assets, and lease repayments (IFRS 16).

The accounting principles applied to CAPEX can be reconciled with the financial statements.

Regulatory tables

TAB 1: PROPORTION OF CAPEX FROM PRODUCTS OR SERVICES ASSOCIATED WITH TAXONOMY-ALIGNED ECONOMIC ACTIVITIES – DISCLOSURE COVERING YEAR 2024

Financial year N	2024			Substantial Contribution Criteria							DNSH criteria ("Does Not Significantly Harm")(h)								
Economic Activities (1)	Code (2)	CapEx (3)	Proportion of CapEx, year N (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity (10)	Climate Change Mitigation (11)	Climate Change Adaptation (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)	Minimum safeguards (17)	Proportion of Taxonomy aligned (A.1.) or eligible (A.2.) CapEx, year N-1 (18)	Category enabling activity (19)	Category transitional activity (20)
		M€	%	Y/N* N/EL**	Y/N* N/EL**	Y/N* N/EL**	Y/N* N/EL**	Y/N* N/EL**	Y/N* N/EL**	Y/N*	Y/N*	Y/N*	Y/N*	Y/N*	Y/N*	Y/N*	%	E	T
A. Taxonomy-eligible activities																			
A.1. Environmentally sustainable activities (Taxonomy-aligned)																			
Electricity generation from bioenergy	CCM4.8	14.6	1.9%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y		Y	Y	0.7%		
Production of heat/cool using waste heat	CCM4.25	11.0	1.4%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y		Y	Y	Y	Y	0.8%		
Construction, extension and operation of water collection, treatment and supply systems **Water Supply (France, Italy and ECA)**	CCM5.1; **WTR2.1**	34.2	4.4%	N	N/EL	Y	N/EL	N/EL	N/EL	Y	Y	Y			Y	Y	-		
Construction, extension and operation of water collection, treatment and supply systems (Asia) **Water Supply**	**CCM5.1;** WTR2.1	8.6	1.1%	Y	N/EL	N	N/EL	N/EL	N/EL	Y	Y	Y			Y	Y	4.1%		
Construction, extension and operation of waste water collection and treatment **Urban Waste Water Treatment (ECA and Italy)**	CCM5.3; **WTR2.2**	23.0	3.0%	N	N/EL	Y	N/EL	N/EL	N/EL	Y	Y	Y	Y		Y	Y	-		
Construction, extension and operation of waste water collection and treatment (France) **Urban Waste Water Treatment**	**CCM5.3;** WTR2.2	4.2	0.5%	Y	N/EL	N	N/EL	N/EL	N/EL	Y	Y	Y	Y		Y	Y	0.7%		
Collection and transport of non-hazardous waste in source segregated fractions; **Collection and transport of non-hazardous waste**	CCM 5.5; **CE 2.3**	25.4	3.3%	N	N/EL	N/EL	N/EL	Y	N/EL	Y	Y			Y		Y	3.2%		
Anaerobic digestion of bio-waste; **Recovery of bio-waste by anaerobic digestion or composting**	CCM 5.7; **CE 2.5**	7.0	0.9%	N	N/EL	N/EL	N/EL	Y	N/EL	Y	Y	Y	Y		Y	Y	0.4%		
Composting of bio-waste; Recovery of bio-waste by anaerobic digestion or composting	CCM 5.8; **CE2.5**	3.6	0.5%	N	N/EL	N/EL	N/EL	Y	N/EL	Y	Y		Y		Y	Y	0.3%		
Material recovery from non-hazardous waste; **Sorting and material recovery of non-hazardous waste**	CCM5.9; **CE2.7**	56.0	7.2%	N	N/EL	N/EL	N/EL	Y	N/EL	Y	Y				Y	Y	8.7%		
Landfill gas capture and utilisation	CCM5.10	3.6	0.5%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y		Y		Y	Y	0.3%		
Collection and transport of non-hazardous and hazardous waste	CE2.3	6.4	0.8%	N/EL	N/EL	N/EL	N/EL	Y	N/EL		Y	Y	Y			Y	-		
Treatment of hazardous waste	**PPC2.2;** CE 2.4	6.0	0.8%	N/EL	N/EL	N/EL	Y	N	N/EL		Y	Y			Y	Y	-		
Treatment of hazardous waste	PPC2.2	15.1	1.9%	N/EL	N/EL	N/EL	Y	N/EL	N/EL		Y	Y			Y	Y	-		
Depollution and dismantling of end-of-life products	CE 2.4	5.5	0.7%	N/EL	N/EL	N/EL	N/EL	Y	N/EL	Y	Y	Y	Y		Y	Y	-		

* *Yes/No.*

** *Non-eligible/eligible.*

Financial year N	2024			Substantial Contribution Criteria						DNSH criteria ("Does Not Significantly Harm")(h)								
Economic Activities (1)	Code (2)	CapEx (3)	Proportion of CapEx, year N (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity (10)	Climate Change Mitigation (11)	Climate Change Adaptation (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)	Minimum safeguards (17)	Proportion of Taxonomy aligned (A.1.) or eligible (A.2.) CapEx, year N-1 (18)	Category enabling activity (19)	Category transitional activity (20)
		M€	%	Y/N* N/EL** %	Y/N* N/EL**	Y/N* N/EL**	Y/N* N/EL**	Y/N* N/EL**	Y/N* N/EL**	Y/N*	Y/N*	Y/N*	Y/N*	Y/N*	Y/N*	Y/N*	%	E	T
Sorting and material recovery of non-hazardous waste	CE2.7	2.0	0.3%	N/EL	N/EL	N/EL	N/EL	Y	N/EL		Y		Y		Y	Y	-		
Remediation of contaminated sites and areas	PPC2.4	0.1	0.0%	N/EL	N/EL	N/EL	Y	N/EL	N/EL	Y	Y	Y		Y	Y	Y	-		
CapEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		**226.4**	**29.1%**	**5.4%**	**0.0%**	**7.4%**	**2.7%**	**13.6%**	**0.0%**	**Y**	**Y**	**Y**	**Y**	**Y**	**Y**	**Y**	**19.1%**		
Of which Enabling			**%**	**%**	**%**	**%**	**%**	**%**	**%**	**Y**	**Y**	**Y**	**Y**	**Y**	**Y**	**Y**	**%**	**H**	
Of which Transitional			**%**	**%**						**Y**	**Y**	**Y**	**Y**	**Y**	**Y**	**Y**	**%**		**T**
A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (g)																			
Electricity generation from bioenergy	CCM4.8	-	0.0%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.8%		
Production of heat/cool using waste heat	CCM4.25	11.3	1.5%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.0%		
Construction, extension and operation of water collection, treatment and supply systems **Water Supply (France, Italy and ECA)**	CCM5.1; **WTR2.1**	59.0	7.6%	EL	N/EL	EL	N/EL	N/EL	N/EL								-		
Construction, extension and operation of water collection, treatment and supply systems (Asia) **Water Supply**	**CCM5.1;** WTR2.1			EL	N/EL	EL	N/EL	N/EL	N/EL								9.9%		
Construction, extension and operation of waste water collection and treatment **Urban Waste Water Treatment (ECA and Italy)**	CCM5.3; **WTR2.2**	3.2	0.4%	EL	N/EL	EL	N/EL	N/EL	N/EL								-		
Construction, extension and operation of waste water collection and treatment (France) **Urban Waste Water Treatment**	**CCM5.3;** WTR2.2	35.3	4.5%	EL	N/EL	EL	N/EL	N/EL	N/EL								8.7%		
Collection and transport of non-hazardous waste in source segregated fractions; **Collection and transport of non-hazardous waste**	CCM 5.5; **CE 2.3**	-	0.0%	EL	N/EL	N/EL	N/EL	EL	N/EL								0.1%		
Anaerobic digestion of bio-waste; **Recovery of bio-waste by anaerobic digestion or composting**	CCM 5.7; **CE 2.5**	0.1	0.0%	EL	N/EL	N/EL	N/EL	EL	N/EL								0.1%		
Material recovery from non-hazardous waste; **Sorting and material recovery of non-hazardous waste**	CCM5.9; **CE2.7**	0.9	0.1%	EL	N/EL	N/EL	N/EL	EL	N/EL								0.1%		

* *Yes/No.*

** *Non-eligible/eligible.*

Financial year N	2024			Substantial Contribution Criteria						DNSH criteria ("Does Not Significantly Harm")(h)								
Economic Activities (1)	Code (2)	CapEx (3)	Proportion of CapEx, year N (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity (10)	Climate Change Mitigation (11)	Climate Change Adaptation (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)	Minimum safeguards (17)	Proportion of Taxonomy aligned (A.1.) or eligible (A.2.) CapEx, year N-1 (18)	Category enabling activity (19)	Category transitional activity (20)
		M€	%	Y/N* N/EL**	Y/N* N/EL**	Y/N* N/EL**	Y/N* N/EL**	Y/N* N/EL**	Y/N* N/EL**	Y/N*	Y/N*	Y/N*	Y/N*	Y/N*	Y/N*	Y/N*	%	E	T
Landfill gas capture and utilisation	CCM5.10	0.8	0.1%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								1.1%		
Collection and transport of hazardous waste	PPC2.1	1.5	0.2%	N/EL	N/EL	N/EL	EL	N/EL	N/EL								0.6%		
Collection and transport of non-hazardous and hazardous waste	CE2.3	-	0.0%	N/EL	N/EL	N/EL	N/EL	EL	N/EL								0.3%		
Treatment of hazardous waste	PPC2.2; CE 2.4	-	0.0%	N/EL	N/EL	N/EL	EL	EL	N/EL								1.8%		
Treatment of hazardous waste	PPC2.2	-	0.0%	N/EL	N/EL	N/EL	EL	N/EL	N/EL								0.5%		
Depollution and dismantling of end-of-life products	CE 2.4	0.5	0.1%	N/EL	N/EL	N/EL	N/EL	EL	N/EL								0.0%		
Production of alternative water resources for purposes other than human consumption	CE2.2	-	0.0%	N/EL	N/EL	N/EL	N/EL	EL	N/EL								0.0%		
Provision of IT/OT data-driven solutions for leakage reduction	WTR4.1	0.1	0.0%	N/EL	N/EL	EL	N/EL	N/EL	N/EL								1.1%		
Transport by motorbikes, passenger cars and light commercial vehicles	CCM6.5	31.5	4.1%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.0%		
Freight transport services by road	CCM6.6	0.4	0.1%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.9%		
Renovation of existing buildings	**CCM7.2;** CE3.2	5.5	0.7%	EL	N/EL	N/EL	N/EL	EL	N/EL								0.0%		
Installation, maintenance and repair of energy efficiency equipment	CCM7.3	0.2	0.0%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.0%		
Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings	CCM7.5	1.0	0.1%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.8%		
Acquisition and ownership of buildings	CCM7.7	3.0	0.4%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.4%		
Data processing, hosting and related activities	CCM8.1	0.9	0.1%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.1%		
Data-driven solutions for GHG emissions reductions	CCM8.2	0.5	0.1%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.0%		
Research, development and innovation for direct air capture of CO_2	CCM9.2	0.6	0.1%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.0%		
CapEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		**156.4**	**20.1%**	**10.6%**	**0.0%**	**9.1%**	**0.2%**	**0.2%**	**0.0%**								**27.5%**		
A. CapEx of Taxonomy eligible activities (A.1+A.2)		**382.7**	**49.2%**	**%**	**%**	**%**	**%**	**%**	**%**								**46.7%**		
B. Taxonomy-non-eligible activities																			
CapEx of Taxonomy-non-eligible activities		394.4	50.8%																
TOTAL (A. + B.)		777.2	100.0%																

* *Yes/No.*

** *Non-eligible/eligible.*

TAB 2: PROPORTION OF CAPEX FROM PRODUCTS OR SERVICES ASSOCIATED WITH TAXONOMY-ALIGNED ECONOMIC ACTIVITIES PER ENVIRONMENTAL OBJECTIVE – DISCLOSURE COVERING YEAR 2024

	Proportion of CapEx/Total CapEx	
	Taxonomy-aligned per objective	Taxonomy-eligible per objective
CCM	20%	45%
CCA	0%	0%
WTR	7%	22%
CE	15%	16%
PPC	3%	3%
BIO	0%	0%

13.2.2.3. Operating expenditure (OPEX)

Presentation of the indicator

The OPEX indicator includes an eligibility ratio and an alignment ratio. Those two ratios are defined respectively as Taxonomy-eligible OPEX (numerator) divided by total OPEX (denominator), and Taxonomy-aligned OPEX (numerator) divided by total OPEX (denominator).

Numerator

The numerators of the ratios include operating expenditure related to assets or associated processes, i.e.

- activities that are eligible (for the eligibility ratio), or aligned (for the alignment ratio) with the Taxonomy;
- individual measures enabling activities to become low- carbon, or individual building renovation measures.

Denominator

Total operating expenditure (common denominator for the two ratios) includes direct non-capitalized costs related to

R&D, building renovation measures, short-term rentals, maintenance and repairs, and all other direct expenses related to the day-to-day upkeep of property, plant, and equipment by the Company or a third-party subcontractor that are necessary to ensure the ongoing, efficient operation of these assets. Direct costs for training and other human resource adaptation needs are excluded from the calculation of the ratio in the numerator and denominator, as Annex I to Article 8 of the delegated act only includes these costs in the numerator.

As SUEZ doesn't have the granularity required to isolate these OPEX in its consolidation tool at Group level and to ensure the robustness of the reporting, each Business Unit CFO has signed a report confirming the numerator and denominator amount to be used for OPEX as defined in the Taxonomy above.

Regulatory tables

TAB 1: PROPORTION OF OPEX FROM PRODUCTS OR SERVICES ASSOCIATED WITH TAXONOMY-ALIGNED ECONOMIC ACTIVITIES – DISCLOSURE COVERING YEAR 2024

Financial year N		2024		Substantial Contribution Criteria							DNSH criteria ("Does Not Significantly Harm")(h)									
Economic Activities (1)	Code (2)	OpEx (3)	Proportion of OpEx, year N (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity (10)	Climate Change Mitigation (11)	Climate Change Adaptation (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)	Minimum safeguards (17)	Proportion of Taxonomy aligned (A.1.) or eligible (A.2.) OpEx, year N-1 (18)	Category enabling activity (19)	Category transitional activity (20)
		M€	%	Y/N* N/EL**	Y/N* N/EL**	Y/N* N/EL**	Y/N* N/EL**	Y/N* N/EL**	Y/N* N/EL**	Y/N*	Y/N*	Y/N*	Y/N*	Y/N*	Y/N*	Y/N*	%	E	T
A. Taxonomy-eligible activities																			
A.1. Environmentally sustainable activities (Taxonomy-aligned)																			
Electricity generation from bioenergy	CCM4.8	8.8	0.9%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y		Y	Y	0.5%		
Production of heat/cool using waste heat	CCM4.25	7.0	0.7%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y		Y	Y	Y	Y	0.7%		
Construction, extension and operation of water collection, treatment and supply systems **Water Supply (France, Italy and ECA)**	CCM5.1; **WTR2.1**	37.7	3.9%	N	N/EL	Y	N/EL	N/EL	N/EL	Y	Y	Y			Y	Y	-		
Construction, extension and operation of water collection, treatment and supply systems (Asia) **Water Supply**	**CCM5.1;** WTR2.1	2.6	0.3%	Y	N/EL	N	N/EL	N/EL	N/EL	Y	Y	Y			Y	Y	1.1%		
Construction, extension and operation of waste water collection and treatment **Urban Waste Water Treatment (ECA and Italy)**	CCM5.3; **WTR2.2**	6.5	0.7%	N	N/EL	Y	N/EL	N/EL	N/EL	Y	Y	Y	Y		Y	Y	-		
Construction, extension and operation of waste water collection and treatment (France) **Urban Waste Water Treatment**	**CCM5.3;** WTR2.2	9.0	0.9%	Y	N/EL	N	N/EL	N/EL	N/EL	Y	Y	Y	Y		Y	Y	1.4%		
Collection and transport of non-hazardous waste in source segregated fractions; **Collection and transport of non-hazardous waste**	CCM 5.5; **CE 2.3**	35.9	3.7%	N	N/EL	N/EL	N/EL	Y	N/EL	Y	Y			Y		Y	3.7%		
Anaerobic digestion of sewage sludge	CCM5.6	0.1	0.0%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.0%		
Anaerobic digestion of bio-waste; **Recovery of bio-waste by anaerobic digestion or composting**	CCM 5.7; **CE 2.5**	4.8	0.5%	N	N/EL	N/EL	N/EL	Y	N/EL	Y	Y	Y	Y		Y	Y	0.6%		
Composting of bio-waste; **Recovery of bio-waste by anaerobic digestion or composting**	CCM 5.8; **CE2.5**	3.0	0.3%	N	N/EL	N/EL	N/EL	Y	N/EL	Y	Y		Y		Y	Y	0.3%		
Material recovery from non-hazardous waste; **Sorting and material recovery of non-hazardous waste**	CCM5.9; **CE2.7**	43.1	4.5%	N	N/EL	N/EL	N/EL	Y	N/EL	Y	Y				Y	Y	4.5%		
Landfill gas capture and utilisation	CCM5.10	19.3	2.0%	N	N/EL	N/EL	N/EL	Y	N/EL	Y	Y		Y		Y	Y	3.1%		
Collection and transport of hazardous waste	PPC2.1	0.1	0.0%	N/EL	N/EL	N/EL	Y	N/EL	N/EL		Y	Y		Y	Y	Y	-		
Collection and transport of non-hazardous and hazardous waste	CE2.3	17.2	1.8%	N/EL	N/EL	N/EL	N/EL	Y	N/EL		Y	Y	Y			Y	-		
Treatment of hazardous waste	**PPC2.2;** CE 2.4	3.8	0.4%	N/EL	N/EL	N/EL	Y	N	N/EL		Y	Y			Y	Y	-		
Treatment of hazardous waste	PPC2.2	10.6	1.1%	N/EL	N/EL	N/EL	Y	N/EL	N/EL		Y	Y			Y	Y	-		

* *Yes/No.*

** *Non-eligible/eligible.*

Financial year N		2024		Substantial Contribution Criteria						DNSH criteria ("Does Not Significantly Harm")(h)									
Economic Activities (1)	Code (2)	OpEx (3)	Proportion of OpEx, year N (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity (10)	Climate Change Mitigation (11)	Climate Change Adaptation (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)	Minimum safeguards (17)	Proportion of Taxonomy aligned (A.1.) or eligible (A.2.) OpEx, year N-1 (18)	Category enabling activity (19)	Category transitional activity (20)
		M€	%	Y/N* N/EL**	Y/N* N/EL**	Y/N* N/EL**	Y/N* N/EL**	Y/N* N/EL**	Y/N* N/EL**	Y/N*	Y/N*	Y/N*	Y/N*	Y/N*	Y/N*	Y/N*	%	E	T
Depollution and dismantling of end-of-life products	CE 2.4	2.1	0.2%	N/EL	N/EL	N/EL	N/EL	Y	N/EL	Y	Y	Y	Y		Y	Y	-		
Sorting and material recovery of non-hazardous waste	CE2.7	2.2	0.2%	N/EL	N/EL	N/EL	N/EL	Y	N/EL		Y		Y		Y	Y	-		
OpEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		**213.8**	**22.1%**	**2.8%**	**0.0%**	**4.6%**	**1.5%**	**13.2%**	**0.0%**	**Y**	**Y**	**Y**	**Y**	**Y**	**Y**	**Y**	**15.9%**		
Of which Enabling			**%**	**%**	**%**	**%**	**%**	**%**	**%**	**Y**	**Y**	**Y**	**Y**	**Y**	**Y**	**Y**	**0%**		
Of which Transitional			**%**	**%**						**Y**	**Y**	**Y**	**Y**	**Y**	**Y**	**Y**	**0%**		
A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (g)																			
Electricity generation from bioenergy	CCM4.8	-	0.0%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.7%		
Production of heat/cool using waste heat	CCM4.25	6.4	0.7%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								-		
Construction, extension and operation of water collection, treatment and supply systems **Water Supply (France, Italy and ECA)**	CCM5.1; **WTR2.1**	120.2	12.5%	EL	EL	EL	N/EL	N/EL	N/EL								-		
Construction, extension and operation of water collection, treatment and supply systems (Asia) **Water Supply**	**CCM5.1;** WTR2.1	-	0.0%	EL	EL	EL	N/EL	N/EL	N/EL								12.1%		
Construction, extension and operation of waste water collection and treatment **Urban Waste Water Treatment (ECA and Italy)**	CCM5.3; **WTR2.2**	31.7	3.3%	EL	N/EL	EL	N/EL	N/EL	N/EL								-		
Construction, extension and operation of waste water collection and treatment (France) **Urban Waste Water Treatment**	**CCM5.3;** WTR2.2	72.2	7.5%	EL	N/EL	EL	N/EL	N/EL	N/EL								12.0%		
Collection and transport of non-hazardous waste in source segregated fractions; **Collection and transport of non-hazardous waste**	CCM 5.5; **CE 2.3**	11.6	1.2%	EL	N/EL	N/EL	N/EL	EL	N/EL								0.1%		
Anaerobic digestion of sewage sludge	CCM5.6	0.5	0.1%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.0%		
Anaerobic digestion of bio-waste; **Recovery of bio-waste by anaerobic digestion or composting**	CCM 5.7; **CE 2.5**	2.1	0.2%	EL	N/EL	N/EL	N/EL	EL	N/EL								0.3%		
Material recovery from non-hazardous waste; **Sorting and material recovery of non-hazardous waste**	CCM5.9; **CE2.7**	2.6	0.3%	EL	N/EL	N/EL	N/EL	EL	N/EL								0.2%		

* *Yes/No.*

** *Non-eligible/eligible.*

Financial year N		2024		Substantial Contribution Criteria						DNSH criteria ("Does Not Significantly Harm")(h)									
Economic Activities (1)	Code (2)	OpEx (3)	Proportion of OpEx, year N (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity (10)	Climate Change Mitigation (11)	Climate Change Adaptation (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)	Minimum safeguards (17)	Proportion of Taxonomy aligned (A.1.) or eligible (A.2.) OpEx, year N-1 (18)	Category enabling activity (19)	Category transitional activity (20)
		M€	%	Y/N* N/EL**	Y/N* N/EL**	Y/N* N/EL**	Y/N* N/EL**	Y/N* N/EL**	Y/N* N/EL**	Y/N*	Y/N*	Y/N*	Y/N*	Y/N*	Y/N*	Y/N*	%	E	T
Landfill gas capture and utilisation	CCM5.10	1.2	0.1%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.1%		
Collection and transport of hazardous waste	PPC2.1	23.1	2.4%	N/EL	N/EL	N/EL	EL	N/EL	N/EL								2.3%		
Collection and transport of non-hazardous and hazardous waste	CE2.3	0.0	0.0%	N/EL	N/EL	N/EL	N/EL	EL	N/EL								1.5%		
Treatment of hazardous waste	**PPC2.2;** CE 2.4	0.1	0.0%	N/EL	N/EL	N/EL	EL	EL	N/EL								0.3%		
Treatment of hazardous waste	PPC2.2	2.6	0.3%	N/EL	N/EL	N/EL	EL	N/EL	N/EL								1.7%		
Depollution and dismantling of end-of-life products	CE 2.4	0.7	0.1%	N/EL	N/EL	N/EL	N/EL	EL	N/EL								0.3%		
Production of alternative water resources for purposes other than human consumption	CE2.2	2.4	0.2%	N/EL	N/EL	N/EL	N/EL	EL	N/EL								0.0%		
Provision of IT/OT data-driven solutions for leakage reduction	WTR4.1	0.1	0.0%	N/EL	N/EL	EL	N/EL	N/EL	N/EL								0.0%		
Transport by motorbikes, passenger cars and light commercial vehicles	CCM6.5	1.6	0.2%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.2%		
Freight transport services by road	CCM6.6	9.6	1.0%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								1.5%		
Installation, maintenance and repair of energy efficiency equipment	CCM7.3	0.7	0.1%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.0%		
Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings	CCM7.5	0.3	0.0%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.2%		
Acquisition and ownership of buildings	CCM7.7	1.8	0.2%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.2%		
Data-driven solutions for GHG emissions reductions	CCM8.2	1.2	0.1%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.0%		
Research, development and innovation for direct air capture of CO_2	CCM9.2	1.5	0.2%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								-		
OpEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		**294.3**	**30.5%**	**10.0%**	**0.0%**	**15.8%**	**2.7%**	**2.0%**	**0.0%**								**33.7%**		
A. OpEx of Taxonomy eligible activities (A.1+A.2)		**508.1**	**52.6%**	**12.9%**	**0.0%**	**20.3%**	**4.2%**	**15.2%**	**0.0%**								**49.6%**		
B. Taxonomy-non-eligible activities																			
OpEx of Taxonomy-non-eligible activities		**457.4**	**47.4%**																
TOTAL (A. + B.)		**965.4**	**100.0%**																

* *Yes/No.*

** *Non-eligible/eligible.*

TAB 2: PROPORTION OF OPEX FROM PRODUCTS OR SERVICES ASSOCIATED WITH TAXONOMY-ALIGNED ECONOMIC ACTIVITIES PER ENVIRONMENTAL OBJECTIVE – DISCLOSURE COVERING YEAR 2024

	Proportion of OpEx/Total OpEx	
	Taxonomy-aligned per objective	Taxonomy-eligible per objective
CCM	15%	46%
CCA	0%	0%
WTR	5%	29%
CE	11%	14%
PPC	2%	4%
BIO	0%	0%

13.2.2.4. Nuclear and fossil gas related activities

In accordance with the FAQ published in February 2024, SUEZ activities were evaluated with regard to template 1 of Annex XII under Commission Delegated Regulation (EU) 2022/1214 of 9 March 2022: SUEZ is not involved in nuclear energy and fossil gas related activities.

Regulatory table

Row		
	Nuclear energy related activities	
1.	The undertaking carries out, funds or has exposures to research, development, demonstartion and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	NO
2.	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	NO
3.	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades	NO
	Fossil gas related activities	
4.	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	NO
5.	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	NO
6.	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	NO

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STATUTORY AUDITORS REPORT ON THE SUSTAINABILITY STATEMENT

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