

ENGIE EMPLOYEE SHARE OWNERSHIP PLAN

LINK 2026

Country supplement

BELGIUM

You have been invited to invest in shares of ENGIE S.A. through the subscription of units of the sub-fund Link Classic 2026 of the FCPE LINK INTERNATIONAL in the context of the **2026 ENGIE Employee Share Ownership Plan** ("LINK 2026" or the "Offer").

This document contains local offer information and a summary of principal tax and social security consequences relating to your investment.

In the event of any discrepancy between the English version of the Country Supplement and any translation of this document, the English version shall prevail.

GENERAL DISCLAIMER

This document is provided to you in addition to the documents relating to LINK 2026 and in particular the information brochure, the Terms and Conditions of LINK 2026 and the Key Information Document ("KID") of the sub-fund Link Classic 2026 of the FCPE LINK INTERNATIONAL. For additional details, please refer to the Regulations of the International Group Savings Plan (Plan d'Epargne de Groupe International or "PEGI") of ENGIE. All documents are made available to you on the Offer website <https://link.engie.com/2026>.

If you do not understand either the contents of the documents (in particular, the information brochure, the Terms and Conditions of LINK 2026, the KIDs and this country supplement) relating to LINK 2026, the nature of the investment, or the comparative risks and benefits associated with LINK 2026, you should contact an authorised financial advisor.

ENGIE shares are listed on Euronext Paris. The value of your investment will depend on the value of ENGIE shares and therefore implies a risk. Depending on the evolution of the stock market price, it is possible that you would lose the amount you invested.

Neither your employer nor ENGIE can give you investment advice nor any guarantee as to the future price of the ENGIE share.

Local Offer information

1. Issuing Company

ENGIE S.A. (Euronext Paris: ENGI – ISIN code: FR0010208488), a French *société anonyme* with its registered office at 67 Rue Jules Ferry, 92250 La Garenne-Colombes, France, and identified at the Trade and Companies Registry under number 542 107 651 RCS Nanterre (hereinafter the "Company").

Information regarding the Company is available on its website (www.engie.com) and in particular in the universal registration document available on this website.

2. Securities law notice

This document is directed at employees eligible to participate in LINK 2026 only.

This Offer constitutes a private investment and has not been registered with or approved by any competent authorities. The 2026 Offer is made in reliance on the exemption from publishing a prospectus provided for in Article 1(4)(i) of the EU Prospectus Regulation 2017/1129 and in Article 10(3) 1° of the Belgian Law of 11 July 2018 on the offering of investment instruments to the public and the admission of investment instruments to the trading on a regulated market.

For the purposes of Belgian law, this document, jointly with the information brochure and the terms and conditions provided to you shall serve as information document required pursuant to Article 1(4)(i) of the EU Prospectus Regulation 2017/1129 of 14 June 2017 and of the Belgian Law of July 11, 2018 on the offering of investment instruments to the public and the admission of investment instruments to the trading on a regulated market.

The reason for this Offer is to encourage the bond between the employees and ENGIE by allowing them to become shareholders of the Company on preferential terms.

3. Custody

The FCPE (*Fonds Commun de Placement d'Entreprise* in French) is a shareholding vehicle created under French law allowing employees to collectively hold their company shares.

The sub-fund Link Classic 2026 of the FCPE LINK INTERNATIONAL will subscribe for ENGIE shares and issue FCPE units to you that correspond to your investment.

During the life of your investment, voting rights attached to the shares held by the FCPE will be exercised at the General Shareholders meetings by the FCPE Supervisory Board.

4. Holding period and early release events

In consideration of the benefits granted under LINK 2026, your investment must be held for a five-year period until 29 July 2031 inclusive, except in the case of the following early release events:

- Your dismissal;
- Your death or the death of your spouse (or legal cohabitant);
- Your disability or the disability of your spouse (or legal cohabitant);
- Your retirement at the request of your employer.

These early release events are defined by French law, and adapted according to Belgian law, and must be interpreted and applied in a manner consistent with French law and Belgian law. If applicable, you should not conclude that an early release event is available unless you have described your specific case to your employer and your employer has confirmed that it applies to your situation, upon your providing of the requisite supporting documentation.

Your request for early release may be made at any time but each generating event may be invoked only once.

Early releases are possible only after the completion of LINK 2026, which is scheduled to take place on 30 July 2026.

However, with respect to the Free Shares, please note that your investment must be held for a two-year period until 29 July 2028 inclusive, without any case of early release possible.

As from 30 July 2028, the Free Shares will remain locked-up until 29 July 2031 inclusive, but the above-mentioned early release cases will be available.

This allows you to benefit from a reduction in the taxable value of the Free Shares (see the tax section for more information).

5. Labour law disclaimer

Participation in LINK 2026 is completely voluntary. The LINK 2026 offer is made on a discretionary basis and does not form any part of your terms of employment. In particular, any benefits derived from LINK 2026 do not constitute salary for the purposes of any retirement or other benefit plans nor for the purposes of calculating any severance or similar payment. Your participation in LINK 2026 does not give rise to a contractual entitlement to continued employment.

Tax Information

The following is a brief summary of the tax and social security regime that should apply to you if you are an employee tax resident in Belgium at all relevant times and participate in LINK 2026.

If you are not an employee or not a tax resident in Belgium, you should consult your own tax advisor regarding the applicable tax regime.

This summary lists only some of the tax and social security consequences which may result from participating in LINK 2026 and it is for information purposes only. Therefore, this summary should not be treated as the opinion of your employer, its advisors or ENGIE S.A. nor should it be relied upon as being either complete or conclusive.

The tax and social security consequences listed below are described in accordance with the law and practices applicable in Belgium in March 2026. These laws and practices may change over time.

1. Taxation at the time of participation

A. Discount

The **20% discount** granted by ENGIE S.A. on the shares issued to the FCPE LINK INTERNATIONAL is not subject to either income tax or social security contributions.

B. Matching Contribution (Free Shares delivered immediately into the FCPE)

Upon delivery of the Free Shares to the FCPE, you will be liable in Belgium for the **personal income tax** calculated at progressive rates on the amount equal to the market value of the ENGIE shares on the date of delivery.

The applicable rates vary between 25% and 50% (to which must be added the additional local surcharges). Your **employer will withhold the Belgian withholding tax on wages** at similar rates on your salary for the month in which this **benefit in kind** is delivered to you. The withholding tax can be fully deducted from the final tax (and any excess will be refunded).

You should nevertheless be able to benefit from a reduction in the taxable value of the Free Shares, amounting to 16.67% of their value considering that they are made 'unavailable' – i.e. you hold them continuously and without making any early release – for a minimum period of at least two years from the date of delivery.

Thus, the taxable value of the Free Shares should be equal to 83.33% of their value. Consequently, you will only be taxed on the Free Shares on 83.33% of their value, at the progressive income tax rates described above.

C. Monory bis tax reduction

You may benefit from the "Monory bis" mechanism¹, which allows a 30% tax reduction, calculated on the basis of the amount that you actually paid for the ENGIE shares subscribed for you by the FCPE LINK INTERNATIONAL, if you can prove in your tax return for the taxable period during which the Subscription Price was paid, to have acquired ENGIE shares through the FCPE and agree to **hold them for a five-year period**.

¹ **Directors are not eligible** for the "Monory Bis" tax reduction, even if they work under an employment contract.

The maximum amount taken into consideration for the tax reduction per taxable period is **capped at EUR 820** (income year 2026). However, you may not combine, during the same taxable period, this tax reduction with the tax reduction provided for pension savings.

Early release: If you redeem your FCPE units before the end of the 5-year holding period, you will **lose the benefit of the tax reduction** (and this in proportion to the number of months remaining until the expiry of the five-year period mentioned above) and will be taxed retroactively². This retroactive taxation is not applied if the early exit takes place in the event of death.

2. Taxation during the 5-year lock-up period

A. Taxation of dividends in France

No taxation.

B. Taxation of dividends in Belgium

The dividends, if any, allocated by ENGIE S.A. to the FCPE will be automatically reinvested into the FCPE. However, from a Belgian tax perspective, you are deemed to have directly received the dividends and will therefore be **taxed on the dividends** paid by ENGIE S.A. for the year in which they are received by that sub-fund.

You will be required to **report the dividend amount in your corresponding annual income tax return** and will be taxed at the rate of 30%. Dividends are not subject to social security contributions.

A **tax exemption** is provided for in Belgian law on the first **EUR 833** (amount applicable for the 2026 tax period) of dividends received (per year). In relation to ENGIE dividends received through a FCPE, the Belgian tax administration has confirmed in the past that this exemption is applicable. However, it is computed on any eligible dividend you receive, not only the ENGIE dividends. Dividend that benefits from that exemption and that have not been subject to withholding tax must not be reported in the annual income tax return.

C. Tax on securities accounts

The holding of units of the FCPE may be subject to the tax on securities accounts levied at the rate of 0.15% (0,30% in the future according to the coalition agreement) if the average value of the shares held in the account, during the applicable reference period of twelve consecutive months, exceeds the threshold of 1 million euros. The amount of the tax is limited to 10% of the difference between the average value and the said threshold. You are invited to consult your tax advisor about the reporting obligations relating to this annual tax on securities accounts.

3. Redemption of your FCPE units as from the end of the 5-year lock-up period (or in case of early release)

On 3 April 2026, the Belgian Parliament adopted a law introducing a new 10% tax on financial capital gains, realised on a non-speculative basis from 1 January 2026³. However, the law provides for an exemption on the first EUR 10,000, applicable to all capital gains made during the year (amount indexed for the 2026 income year). The basic exemption can be carried forward to subsequent periods if it is

² Your income tax in respect of the year in which this transfer took place will be increased in proportion to the above-mentioned tax reduction corresponding to $x/60$, where "x" is equal to the number of whole months remaining until the end of the five-year holding period.

³ The new tax applies to all capital gains realized as from 1 January 2026, but only to the extent of the portion of the gain generated as from that date.

not used, up to a maximum of EUR 1,000 per year (amount indexed for the income year 2026), which increases the amount of exemption available in the years in which a capital gain is realised. However, the total amount carried forward is capped at EUR 5,000 (amount indexed for the income year 2026). However, there is still a possible taxation of the capital gain at the rate of 33% if the Belgian tax authorities demonstrate that this capital gain was realized outside the normal management of your private assets.

4. Reporting obligations

"Monory Bis" tax reduction: To obtain and keep the benefit of the tax reduction when you subscribe to LINK 2026, you must provide documentary evidence that you purchased and have been holding ENGIE shares through the FCPE for five (5) years following the date on which the ENGIE shares were paid up. Such proof may be provided, in particular, by means of documents issued by the financial intermediary with whom the securities have been deposited.

Free shares: You must include in your annual tax return the amount of the benefit in kind.

Tax on capital gains:

Until recently, capital gains were in principle not taxable and therefore did not entail any reporting nor payment obligation. With the introduction of capital gains tax, such obligations are now emerging, including the need to document the acquisition value and sale price of shares.

According to the information available, no Belgian intermediary should intervene in the payment of any capital gain. In this case, the obligation to declare and pay the tax would then fall directly on you.

Insofar as the capital gain realised on your ENGIE S.A. shares is less than EUR 10,000 (amount applicable for the 2026 tax period) and provided that no other capital gain is realised during the same financial year, no reporting obligation should in principle apply, due to the exemption provided for (subject to the forthcoming administrative instructions relating to the personal income tax return for the 2027 tax year).

On the other hand, if and to the extent that the total amount of capital gains realised exceeds EUR 10,000 (amount applicable for the 2026 tax period), you would be required to declare the excess in your annual tax return.

Dividends: In principle, you must report in your annual income tax return the amount of the dividends paid by ENGIE S.A.. To the extent that the exemption for the EUR 833 would be available and that no Belgian withholding tax has been levied, you are not required to report the amount of dividend for which you request the exemption.

Securities Account Tax: You should consult your own tax advisor regarding the reporting requirements for the annual securities account tax referred to above.

Foreign account⁴: Your participation in the FCPE may also be considered as constituting a "foreign account"⁵ and trigger the following obligations:

- To **disclose your participation in LINK 2026 as a foreign account in the relevant section "Foreign accounts"**, with indication of the account owner (your name and surname) and the country (France); and
- To mention in the same section whether certain data on your participation in LINK 2026 has been communicated, at the latest at the same time as the submission of your tax return, to the "Central Contact Point" (CCP) at the National Bank of Belgium (NBB). This must be done either electronically (via the NBB website) or by filling in and sending a (paper) form.

⁴ For more information on this subject, we refer you to the following websites of the NBB (with among others a FAQ) or of the tax administration dedicated to this point:

<https://www.nbb.be/en/central-credit-register/central-point-contact-accounts-and-financial-contracts-cpc>

<https://fin.belgium.be/en/private-individuals/international/foreign-income-accounts/accounts>

⁵ Under the extended terms of the definition adopted by the Belgian legislator in the Royal Decree of 3 April 2015.