

---

# Code of Conduct

Stedin Group

---

18 March 2025

# Contents

Foreword.....	3
To whom does this code of conduct apply? .....	4
1. We are Stedin.....	5
2. Good employment practices .....	8
3. Good employee practices.....	10
3.1 Integrity.....	10
3.2 Avoid conflicts of interest.....	11
4. Handling information and company equipment.....	14
4.1 Handling information.....	14
4.2 Company equipment .....	16
4.3 Residual materials.....	17
5. Unacceptable conduct .....	19
5.1 Fraud and theft.....	19
5.2 Energy theft .....	19
5.3 Corruption and bribery.....	20
5.4 Abuse of power.....	20
5.5 Bullying.....	20
5.6 Discrimination .....	21
5.7 Sexual and other forms of harassment.....	21
5.8 Intimidation and aggression.....	21
5.9 Alcohol, drugs and medication .....	22
6. Who can you contact to ask questions or submit a report? .....	23
7. Consequences of code of conduct violations.....	24
8. In conclusion.....	25



# Foreword

Dear colleague,

As a grid operator, Stedin meets one of the basic needs of society. Stedin Group is fully aware of its position in society.

Stedin's grids form part of the Netherlands' vital infrastructure, and employees of Stedin Group are therefore charged with a unique responsibility. The way we fulfil that responsibility is governed by laws and regulations and by expectations from society. We have translated those expectations and the laws and regulations into our own Stedin policies and processes. This code of conduct specifies what type of behaviour is and is not appropriate within this framework. In our daily work, the code helps us to comply with both the letter and the spirit of the laws and regulations that apply to us, and with the agreements we have made with each other and our stakeholders, including Dutch society as a whole.

Everybody who works for or is going to work for Stedin is expected to be familiar with and comply with this code. This helps us to maintain a pleasant working environment, preserve our reputation and improve our business results.

This code of conduct covers our personal behaviour and responsibilities. The Stedin Group Human Rights Policy, our Corporate Governance Code, Stedin's position in society in view of its mission and the applicable legislation form the basis for the code of conduct. By adhering to this code of conduct, we will ensure that our business remains healthy in the long term and continues to add value to society.

Board of Management

Stedin Group



# To whom does this code of conduct apply?

The code of conduct of Stedin Group (hereinafter referred to as Stedin) is an inseparable part of:

- all permanent or temporary employment agreements;
- internship agreements; and
- secondment agreements and freelance agreements for which an personnel number is assigned.

The code of conduct therefore applies to all employees of all companies that are part of Stedin Group. Everyone is assumed to be familiar with and endorse its contents and to comply with its rules of conduct in letter and in spirit.

The contents of this code of conduct were formulated by the Board of Management and coordinated with the Works Council. As an employer, Stedin is entitled to unilaterally amend this code of conduct at any time, provided that the amendment in question does not contravene the law or the collective labour agreement and following consultation with the Works Council.

If you have any questions about the interpretation of this code of conduct, please contact your manager.

# 1. We are Stedin

We say what we do and we do what we say!

Our stakeholders' trust in our values and standards depends on our corporate culture and behaviours.

After all, leading by example encourages others to do the same.

## Position

Stedin is a regional grid operator. We have been designated by the Dutch government as a vital provider (an organisation offering a service whose continuity is vital to Dutch society) and therefore have a huge social responsibility. You and your colleagues help us to fulfil that responsibility every day.

## Values and standards

This code of conduct covers the core standards and values of our organisation. Integrity and quality are essential to any business that fulfils a critical social role, and compliance with all applicable legislation and internal regulations boosts these vital aspects. Trust in our core values and standards, and our ability to build further upon them, is determined by our business culture and our individual conduct.

## Culture and communication

At Stedin, we strive to cultivate a culture where people feel connected and where everyone is treated with respect. We behave with integrity towards colleagues, customers and other stakeholders. We treat each other as equals in our communication. Establishing and maintaining this culture is the responsibility of everyone at Stedin. We are always honest and reliable, we are clear in our communication with customers and with each other and we always paint a realistic picture of what can and cannot be expected.

We create an honest, safe and nurturing working environment that makes our employees proud to work for us. We make decisions regarding recruiting, selecting, promoting and dismissing employees, as well as choosing contractors and awarding tenders, based on objective criteria.

## Leadership

Our managers play a vital role in promoting our business culture by continually setting a good example, since leading by example encourages others to do the same. We deliberately set the bar very high when it comes to the exemplary role that our managers play.

## Taking responsibility

Employees are still personally responsible for their own behaviour and for addressing any issues they may witness in the workplace. Your manager is the first point of contact if you observe any situations where you believe a colleague has not acted with integrity. If you feel your concern has not been adequately addressed by your manager, you can turn to someone else in the organisation you trust or contact the confidential advisor, the hotline or the compliance officer. In Chapter 6, you can find information on how and to whom any issues related to behaviour and integrity should be reported.

## Environmental responsibility and waste

At Stedin, we ensure that we comply with applicable environmental laws and regulations, such as the Dutch Environment and Planning Act, the Environmental Management Act and the EU Waste List Regulation (Eural), as well as our own policies on this subject.

We strive to reduce waste generation, prevent environmental incidents and dispose of or store waste appropriately.

### Honest business practices

At Stedin, we make every effort to act in compliance with economic sanctions, embargoes and other trade restrictions that apply. This includes refraining from doing business indirectly with any sanctioned entities and/or individuals.

We do not engage in money laundering, which involves spending illegally obtained funds in an apparently legitimate way. We therefore ask our employees to always be on alert when making payments or receiving payment requests from third parties that deviate from the business standard.

# 2. Good employment practices

Respect for employees is a core principle in Stedin's employment philosophy. Managers at all levels play an important role in this.

We express our commitment to respecting universal human rights in the Stedin Group [Human Rights Statement](#).

## Equality

For one thing, this means that people can expect to receive the same treatment under the same circumstances. We do not discriminate. At Stedin, everyone has equal opportunities.

We create a safe and nurturing working environment that makes our employees proud to work for us. We place huge importance on diversity and inclusion here. Our policy is to ensure our workforce accurately reflects the diversity of society, and the acquisition of talent and diversity is part of these efforts. By fostering creativity and engagement among our employees, we aim to achieve a healthy work-life balance that leads to greater productivity.

## Clarity on rules and agreements

Policy rules, regulations and individual and collective agreements with employees are clearly and accessibly recorded and complied with. This creates clarity among employees and ensures that everyone knows and understands our standards and values. You can find our policies and rules on the intranet, with HR and relevant departments (e.g. on data security or safety).

**If it isn't safe, don't do it!**

**Speak to your colleagues and employees of contractors or subcontractors if you see them acting in an unsafe manner.**

Working safely and creating safe conditions for employees, customers and bystanders while work is ongoing is a top priority for Stedin. We will never take any unnecessary risks when it comes to the safety of our employees, customers, business relations, neighbours and the surrounding area. By safety, we mean not only the physical safety of employees but also social and psychological safety, information and data security, and care for the environment and our surrounding communities. The aspect of safety is firmly embedded into all of our business processes. When performing our duties, we minimise safety risks to the greatest extent possible by complying fully with all applicable guidelines and procedures.

## 2.1 Health comes first

The health and safety of our employees is vitally important, which is why we take all possible measures to ensure the work does not have any negative effects on health. For example, we conduct periodic health checks for employees working in positions that involve increased health risks, such as employees who climb high-voltage masts or carry out other physically strenuous jobs. Employees working standby and repair service shifts or who come into contact with potentially harmful substances or noise also undergo periodic health checks. Employees can also request this kind of periodic health check themselves, even if their position does not formally involve an increased risk.

If you think your health is at risk during your work, you must report this to your manager or the HR department immediately. You can also make an appointment with the company doctor.



## 2.2 Safety procedures

You must be familiar with and strictly comply with any safety procedures relating to your work. At Stedin, we expect you to take responsibility for working in a safe and responsible manner. This includes reporting unsafe situations and safety incidents. Reports will be investigated and measures will be implemented to prevent them from occurring again.

What does that mean for you in practice?

- Always work safely! You must carefully monitor and protect your own and your colleagues' health and safety to ensure that everyone returns home in optimum health at the end of the working day. Never trivialise the danger of unsafe working practices. In the event of an unsafe situation, stop working immediately. If it isn't safe, don't do it.
- You are required to know and comply with the applicable safety procedures and to follow the corresponding training courses.
- Working safely is about much more than just complying with safety procedures. It also means that you and your colleagues are responsible for ensuring a socially safe environment for others.
- Not complying with our guidelines, working procedures and safety instructions means that you are putting your own safety and the safety of your colleagues or the environment at risk.
- Speak to your colleagues and employees of contractors or subcontractors if you see them acting in an unsafe manner. Don't start working until you are certain that the contractor or subcontractor is complying with the safety rules. We will support you in any situation in which you are instructing contractors or subcontractors to follow the rules.
- You must work in compliance with Stedin's safety rules and make use of the personal protective equipment provided by us, such as protective clothing. If you see a colleague failing to use protective equipment or not using it correctly, speak to them about it. If, for any reason, you do not want to do this yourself, please tell your manager. This is not about 'snitching' on others, but looking out for each other's safety.
- Adhere to the rules on working hours and overtime. Working longer than permitted can reduce your concentration and make you more likely to make mistakes. Do not ask others to work longer than is allowed.
- When arriving at a particular work site, assess all safety risks together and only enter the site if you are convinced it is safe to do so. If you are unsure whether a specific situation is safe, speak to your manager or our safety experts.
- Use [Alerta](#) on the intranet homepage to immediately report any unsafe situations at work sites and project sites to the Safety Desk.
- If you have any questions about safety, you can always ask your manager or our safety experts.
- If any changes in your personal situation could impact safety in any way, such as taking medication that may impair your reaction capability, report this to your manager and the company doctor immediately.

## 2.3 Screening procedure

Screening new and, in some cases, existing employees helps us to maintain integrity and safety in our working environment. We investigate the background of internal and external candidates for positions with an increased risk profile. A screening procedure is carried out carefully, transparently and in accordance with privacy legislation and the [Stedin Group screening policy](#).

Screening is only conducted with your explicit consent. However, if we cannot carry out a screening procedure, this may affect your position.

# 3. Good employee practices

Keep your promises, take responsibility for your own actions and be honest with everyone, especially customers and your colleagues.

As a Stedin employee, you are an ambassador for the company and represent what we stand for: professionalism and customer focus. Naturally, this includes a neat and professional appearance and clothing, impeccable behaviour and good communication skills. You also demonstrate your professionalism by always working safely and by communicating well and maintaining a neat and tidy workplace. By workplace, we also mean company vehicles provided to you.

## 3.1 Integrity

Integrity is absolutely crucial to us. In short, integrity means: the personal trait or character trait of an individual that implies that you are an honest person, are sincere and cannot be bribed. You are intrinsically reliable, do not lie, keep your word, have no hidden agenda and do not feign your emotions. A person of integrity will not allow their actions to be improperly influenced, such as through self-interest or personal gain.

We expect you as an employee to comply with the behaviour described in this code of conduct, even at times when you feel under pressure to deviate from it. You must be able to account for your conduct and behave in a businesslike manner at all times. Sincerity is fundamental to how we work with each other. It is vital that you comply with the agreements made, and you can trust your colleagues to do the same. Treat everybody the way you would wish to be treated. Naturally this includes in your interactions with customers, business relations, members of the public and other external parties.

### Professionalism and clarity

We communicate with each other in a friendly and professional manner and ask for clarity from the people we are talking to. We work as a team and can count on one another.

Your attitude and behaviour in the workplace affect the behaviour of your colleagues. The company trusts you, so make sure you are always monitoring your own integrity. Stay alert for any dishonest conduct by your colleagues.

### What does that mean for you in practice?

- It goes without saying that you must never be in violation of the law.
- You faith in your colleagues. You adhere to all agreements made. You are aware that integrity starts with you.
- We discuss each other's performance, attitude and conduct. We expect you to be open to feedback in order to prevent and resolve problems.
- In principle, **you** are allowed to record conversations in which you are a participant. If you plan to record a conversation, (e.g. a Teams meeting), it is best to inform all other participants beforehand. Please note: you are not allowed to make the recording public without permission. Recording phone calls that you are not part of is a criminal offence.
- We work together as a team, and we must be able to count on one another. Comply with all agreements made. Don't just think in terms of your own department; consult other colleagues too. Effective work handover is an essential part of our collaboration.
- Set a good example, both as a manager and as an employee.

- Speak to any colleagues who display unacceptable conduct. Give each other constructive criticism.
- Work together. Ask your colleagues for advice and help each other.
- Be open and honest, even if you have made a mistake.
- If you feel uncomfortable with the way a colleague has treated you, tell them. Talk about their behaviour.
- If that does not resolve the issue or if talking to them is not an option, speak to your manager, senior manager, confidential advisor, employment officer, the integrity hotline or the compliance officer.

Be mindful that explicitly expressing certain positions, especially political ones, that may be sensitive in society or engaging in lobbying can be perceived as inappropriate by those around you. While we respect everyone's opinions and decisions, remember that, when at work for Stedin, your behaviour must convey Stedin's neutrality.

If you are ever in doubt whether your actions are correct, ask yourself the following questions:

- Can I take full responsibility for my actions and decisions?
- Have I properly thought through any potential negative consequences of what I am doing?
- Does what I am doing make a positive contribution to our strategy or achieving a Stedin objective?
- Could I explain my conduct or situation to my manager and/or colleagues?
- How would I feel if my behaviour were discussed on social media? Would I stand by it?

Would I stand by my actions and behaviour, regardless of my position? If you can answer 'yes' to all of these questions, then you are promoting our culture of responsible business conduct and professional practice. In most cases, you will know when your integrity comes under threat. For example, if the prospect of other people finding out about your actions makes you feel uncomfortable, then this is a clear sign that your integrity may have been compromised.

## 3.2 Avoid conflicts of interest

Conflicts of interest are situations in which personal interests and business interests become muddled with each other. Such situations can give the impression of dishonesty, even if this is not your intention. At the very least, you must realise that it will not reflect well on you if your name is associated with conflicts of interest, so it is important that you do everything you can to avoid them.

There are many conceivable examples of situations involving conflicts of interest:

- Do not accept products or services offered to you personally by a business contact.
- As a mechanic, you cannot perform a task for a customer on behalf of the company (e.g. to change a meter) and then perform similar tasks (e.g. making a gas tap for a heater, installing a water pipe in a shed, etc.) in your own name and for your own account.
- You cannot offer discounts to business contacts if you would get a private benefit in return.
- If you happen to know a business contact personally, treat them the same way you would other business contacts and do not give them any preferential treatment. Even better, assign this business contact to a colleague.
- You must not use data obtained at work to benefit you in a personal capacity. This can in certain cases even constitute a criminal offence (e.g. buying/selling stocks based on insider knowledge).
- Accepting gifts or invitations could be interpreted as bribery and/or corruption.

When it comes to integrity, we expect exemplary conduct and transparency all the way to the very top of the business. A strict and specific set of integrity rules has been formulated for members of the Board of Management and the Supervisory Board. These rules can be found on the corporate website in the [Supervisory Board Regulations](#).

### 3.3 Giving and receiving gifts

Accepting gifts from business contacts can easily raise suspicions of a conflict of interest, even when they are not asking for anything in return. Of course, we are not talking about being offered a cup of coffee or an occasional simple lunch. Do not accept any gifts worth more than EUR 50.

#### Returning or raffling off gifts

One sign that you may be heading in the wrong direction is if you feel reluctant to let others know that you have received a gift or if the gift might cause envy among colleagues.

If you receive a gift just before an important contract is closed, it is best to return it to the sender immediately. Discuss it with your business contact and explain that we have rules about accepting such gifts. If it is a thank-you gift to an entire department for a job well done and is reasonably proportional, then the gift will be shared or raffled off among the department.

#### Be transparent

Gifts must never be received at an employee's home address. Be transparent with your colleagues about gifts that you receive. If you receive an expensive gift or have doubts about whether it is appropriate, inform your manager or the compliance officer.

All rules relating to accepting gifts equally apply to giving gifts: we do not give gifts to gain favour with other parties.

### 3.4 Receiving invitations to events

Do not accept invitations from business contacts that could influence the impartiality of your decisions. You can only accept such invitations if this would constitute customary social practice and if the value of the invitation does not exceed EUR 50.

If you ever receive such an invitation, be transparent about it and ask permission from your manager if you wish to accept it. If you are in any doubt, please speak to the compliance officer.

#### How can you determine whether an invitation is appropriate/reasonable?

The following circumstances indicate risks that would make it advisable to reject the invitation:

- The invitation relates to an event that is predominantly of entertainment value (e.g. a concert or sports match).
- You are currently negotiating a new contract with the business contact.
- The event's content is not in line with Stedin's core values.
- Attending or taking part in the event may result in negative media attention and negative public opinion.
- The invitation is expensive, personal and unique.
- The provider is one of Stedin's existing or potential suppliers.
- The business contact will not be attending the event.
- Your partner and family are also invited.
- The value of the invitation exceeds EUR 50.

- The invitation involves a high level of luxury.
- The event is conducted over multiple days.

### 3.5 Relationships in the workplace

It is of course perfectly acceptable to be friends with your colleagues. However, a personal relationship with a colleague can affect our business interests or the interests of other colleagues. You must therefore be transparent with your manager about any romantic relationships, close friendships or family relationships in the workplace.

Workplace romances can result in rumours and can sometimes escalate into serious conflicts, especially when the relationship is between an employee and their manager. If partners work closely together or in the same department, then it can be difficult to remain objective about each other. In certain cases, it may be wise from an optics point of view to take measures such as transferring to a different department. Be open and honest with your manager early on about any personal relationships at work.

### 3.6 Other positions and ancillary activities

Naturally, we greatly value employees getting actively involved in society. However, any ancillary positions or activities must not conflict with Stedin's business interests. For this reason, you must report any ancillary positions and activities to your manager in advance.

Generally speaking, employees may take on paid ancillary work. However, these are not allowed if, for example, there is a potential or demonstrable conflict of interest, breach of confidentiality of company information or breach of the Working Hours Act. Always seek prior approval for ancillary activities by filling in the form in Workday.

The definition of ancillary positions in this regard also includes involvement in the National Reserve Corps and the Volunteer Fire Brigade. See also Article 3.3 of the collective labour agreement for grid operators (cao NWB),

which states that the use of Stedin tools, materials and all other property of Stedin to carry out ancillary activities is explicitly prohibited.

#### Unpaid ancillary activities

Ancillary activities or work refers to both paid and unpaid activities and positions. Examples of unpaid ancillary activities could include voluntary work at a sports club, membership of a parents' council at a school or activities as a member of your homeowners' association.

Unpaid ancillary activities are allowed in principle, provided the voluntary activities do not conflict with Stedin's business interests. By this, we not only refer to Stedin's direct financial interests but also to issues such as your ability to give full attention to your work for Stedin. Therefore, even in the case of unpaid ancillary work, we expect you to request permission by filling in the form in Workday so that we can avoid any conflicts of interest.

# 4. Handling information and company equipment

Whether it is financial or strategic information, data on customers, employees, suppliers and business partners, employment or legal documents or any other data, our company information is a vital and vulnerable asset that must be handled with the greatest of care at all times. We take all necessary measures to ensure that our digital and physical company information remains internal, private and confidential and never falls into the wrong hands. You must therefore be aware of the risks posed by the use of USB sticks or public Wi-Fi connections or by working in public spaces such as trains or libraries. For this reason, you must always comply with the guidelines concerning this issue, which can be found by clicking on the [Guideline on Data Protection](#) and the [Guideline on Handling Company Equipment and Knowledge](#).

## 4.1 Handling information

Company information must only be shared with colleagues if this is essential for the performance of the work. Sensitive company information and personal data as defined by the General Data Protection Regulation, such as financial data or customer databases, can only be shared with the explicit permission of your manager and provided it is necessary for the purposes of Stedin's business operations.

### Artificial intelligence

Artificial intelligence is a new development with potential benefits, but it also comes with risks and drawbacks. Be mindful in your use of AI and read the [Guideline on the Use of Artificial Intelligence](#), available on the intranet.

### 4.1.1 Chinese walls

A 'Chinese wall' consists of a set of rules and measures to prevent the information we collect in our capacity as grid operator from being passed on to other companies within the Stedin Group, as this is strictly prohibited. This Chinese wall prevents other businesses within the Stedin Group from gaining an unfair competitive advantage using the information that we are obliged to collect in our capacity as grid operator. Consider NetVerder, for example, which could gain a commercial advantage by harnessing customer data from us as a grid operator. An additional objective of Chinese walls is to ensure compliance with legislation governing data security, privacy and duties of confidentiality.

All employees within the Stedin Group are expected to be familiar with this topic. Any party that works for Stedin must sign a grid operator statement, known as the 'Regulations for Employees of a Grid Operator Classified as a Group'. This obligation is specified in the Electricity and Gas Act.

Any failure to comply with legislation in this area can have extremely severe consequences, and in the worst-case scenario, it could even lead to revocation of our licence to operate as a grid operator.

There is a [Chinese Walls Guideline](#). If you have any questions about this topic, please consult the legal department or the compliance officer.

### 4.1.2 Clean desk, screen & office

A clean desk, screen & office are important building blocks for data security. A clean desk means that paper or files are not left on your desk when you are not around. A clean screen means that you lock your computer screen upon leaving your workstation. A clean office means that no sensitive data are



left behind in conference rooms (e.g. on flip charts or walls), on printers, in unsecured waste containers, in unlocked cupboards or in any other easily accessible areas. Also, while working, make sure that others cannot watch what you are doing, especially in public places such as on public transport or in public waiting areas.

### 4.1.3 Archiving

As a Stedin employee, you are responsible for the reliability and efficient management of information. This includes being responsible for archiving information correctly.

- You must handle all of Stedin's paper and digital company data with great care and take responsibility for the confidentiality of these data.
- You must be aware of the importance of securing company data and handle this data accordingly.
- For certain confidential projects, you may be asked to sign a statement of confidentiality.
- Adhere to the rules regarding a clean desk, screen and office.
- Store information in a systematic manner and in accordance with all applicable procedures. (See also the [Guideline on Document Management](#)).

### 4.1.4 Handling personal data

At Stedin, we collect, modify and store a substantial quantity of personal data, e.g. relating to customers, employees and applicants. This is only allowed by law if Stedin has a lawful basis to process personal data. Stedin's rules on this are detailed in the [Basic Rules for Processing Personal Data](#). We also process personal data about you in your capacity as a Stedin employee. If you want to know which personal data we process about you and for what purpose, you can find this information in our [Privacy Statement](#).

We are obliged to report any serious breaches of personal data security (known as data leaks) to the Dutch Data Protection Authority and also, in case of a high risk, to the data subjects. If you become aware of a potential or actual data breach, report it immediately to [privacy@stedin.net](mailto:privacy@stedin.net) ([Guideline on Data Breaches](#)).

Data subjects (such as customers, employees and applicants) have various privacy rights. These are designed to give people control over their personal data. You can read more about your rights as a data subject and how Stedin complies with legislation and handles these rights in the [Guideline on Data Subject Rights](#).

We are permitted to record telephone calls with customers for training purposes, and a small group of selected individuals is permitted to listen to these recordings. This is done in compliance with the agreements made with the Works Council and recorded in the [Guideline on Voice Logging](#).

Under certain circumstances, Stedin may use your personal data to investigate a potential breach of integrity. In such cases, we may check your email, phone and internet usage, company car trip records and/or camera footage. As such actions constitute a substantial infringement of employee privacy, we have established detailed protocols concerning this matter. These Guidelines have been approved by the Works Council.

- You can find more information about recording and retrieving company car trip records in the [Guideline on Communication Tools](#) (see also [Guideline on Company Cars](#)).
- In certain cases, we may monitor email, telephone and internet usage and install cameras, although the use of such actions is subject to strict conditions. The [Policy Instruction on Reporting and Handling Integrity Incidents](#) and the [Guideline on Camera Surveillance](#) explain how we do this.

#### 4.1.5 Information disclosure

Stedin is subject to a statutory duty of confidentiality concerning data on customers and gas and electricity connections. Circumstances may arise under which it is permissible – or even mandatory – for us to provide data to third parties, for example, in the event that a regulatory body or investigation authority makes a request for such data. Never provide such information without first consulting with our company privacy lawyer or compliance officer, as doing so may breach our statutory duty of confidentiality as a grid operator or the General Data Protection Regulation.

When evaluating this kind of request, it is vital that the aspects of proportionality and justifiability are properly assessed by the relevant departments. For this reason, it may be necessary to coordinate requests for information with multiple parties, such as the Communications, Regulation and Legal Affairs, and Compliance departments. Naturally, any information provided must be accurate, so never provide any data to regulatory bodies, researchers or journalists without due cause or care, and do not discuss any information with them unless you have been explicitly designated to do so by Stedin.

Be careful about what you tell people about your job at parties, during conversations with friends and acquaintances, at conferences, etc.

#### 4.1.6 Sharing information via social media

Social media is a collective noun for all online applications that enable users to share information with each other. Everything that is said or written about Stedin on social media affects our reputation. Bear this in mind when using social media and comply with the following rules:

- What you post on social media must always be done under your own name. Communication via social media under Stedin's name is prohibited unless conducted by specifically designated employees within the Communications departments.
- Never share any company information, and do not engage in any discussions with or about our customers.
- In any online discussions about our products or services conducted in your personal capacity, always clearly communicate your relationship with us.
- Always conduct yourself with integrity and respect when posting anything. More information on this matter can be found in the [Social Media Guideline](#).

### 4.2 Company equipment

The company equipment that we provide to you is intended for business use. You must handle all company equipment – such as company vehicles, IT facilities and software, communication tools (e.g. smartphones or laptops), protective clothing, tools, materials, access passes or work-from-home equipment – with due care and attention.

What does this mean for you in practice?

- Use all company equipment responsibly.
- Never leave expensive equipment unattended (e.g. smartphones or laptops).
- Do not store private data on your work computer, especially if this takes up a lot of storage capacity. Large amounts of family photos and pictures related your hobbies do not belong on your work computer.
- Data that could be deemed indecent or offensive does not belong on your work computer at all, even if you mark it as 'private'.



- Do not make any changes to company equipment without express permission from your manager or authorised persons. For example, it is not allowed to modify or disable access passes or software (especially security software) for your own convenience.

More information can be found in the [Guideline on Handling Company Equipment and Knowledge](#).

#### 4.2.1 Use of IT facilities and communication tools

The IT facilities and communication tools provided are intended for business use.

Personal usage of IT facilities and communication tools belonging to Stedin – such as using the Internet and sending emails via a company laptop or smartphone – is permitted within reason. However, it goes without saying that this usage must not be detrimental to your everyday duties or jeopardise the security and availability of the computer network. This is at the discretion of your manager, the Information Security department and the compliance officer.

If you plan to work from abroad, read the Working from [Abroad Regulations](#) carefully first! For example, it is forbidden to take IT assets to countries that fall into the highest security risk category. If you travel to a country that falls under the highest security risk, even the business applications should be actively removed from your phone (including BYOD).

Your use of the Internet must not be unethical or illegal, such as sending emails that are threatening, offensive, discriminatory or constitute sexual or another form of harassment. All business emails must contain a disclaimer, the name of the sender and the subject. The use of Internet and email services can be recorded and inspected. If such inspections discover content (text or images) that is offensive or illegal or breaches the organisation's standards and values (including this code of conduct), this will be reported to your immediate manager and/or HR. Compliance may also be asked to investigate.

**What does this mean for you in practice?**

- If you have access to a laptop, tablet or smartphone, then you are obliged to exercise great care and attention when using and storing it.
- Use of your company laptop, tablet or smartphone to visit websites that are pornographic, discriminatory, offensive or otherwise provocative in nature is prohibited. It is also prohibited to download non-publicly available sources and/or files that violate the rights of third parties (films, music, data collections, etc.).
- Use the Internet responsibly and use your common sense. The fact that Stedin does not generally block websites on its infrastructure does not constitute a licence for unrestricted personal use of the Internet.
- Laptops, tablets and smartphones are protected using a password or PIN.

More information on this matter can be found in the [Guideline on Communication Tools](#) and the [Guideline on Data Security](#).

#### 4.3 Residual materials

In the course of employees' work, materials may be left over, and old materials may be removed or excavated. We call these residual materials. All residual materials must be handed over to licenced processing company in accordance with the applicable procedures. Residual materials remain the property of Stedin until the point at which they are transferred to a processing company. This means that strict compliance with environmental, health and safety, and liability rules must also be maintained in relation to residual materials. Our contractors and subcontractors are also obliged to strictly comply

with these rules. In the worst-case scenario, failure to hand over residual materials in the correct manner or at all can constitute a criminal offence and have severe consequences for your employment.

#### What does this mean for you in practice?

- If you have leftover or old cables or have dug up old piping, return it! Hand over residual materials in accordance with the applicable procedures.
- Do not take any residual or other materials home for personal use or as additional 'payment in kind'.
- Never sell any residual or other materials to third parties for personal gain, even if the proceeds are for a good purpose or will be used for the benefit of the department (e.g. to fund a team outing or an office party).
- Information on the procedures for handling residual materials can be requested from your manager.

Any breaches of the rules governing residual or other materials will not be tolerated and can have direct consequences for your employment.

# 5. Unacceptable conduct

Integrity is an important core value within our organisation. This is due to the social role that we fulfil: as a grid operator, we must operate as a reliable and neutral party that provides a service that is vital to the economy and to society as a whole. What matters here is not only how the behaviour is intended but also how it is perceived. We therefore expect you to put yourself in someone else's shoes. We have a hotline where you can report unacceptable conduct. This is explained in more detail in Chapter 6.

## 5.1 Fraud and theft

Fraud is a form of deception or misrepresentation intentionally used in order to wrongfully benefit yourself or other parties. Fraudulent conduct will not be tolerated. Engaging in this kind of behaviour may result in severe disciplinary action, up to and including immediate dismissal.

If you are suspected of any fraud, misrepresentation, deception or theft, an investigation will be launched immediately, and you may be suspended during the course of this investigation. Upon completion of the investigation, a decision will be made based on the investigation results.

Examples of fraud and theft include (but are not limited to):

- claiming a higher number of business kilometres than you have actually driven;
- unauthorised personal use of a company vehicle;
- wrongfully claiming costs as business expenses;
- using your specific trade knowledge as a mechanic to redirect pipelines or tamper with meters or seals;
- presenting business results as being more positive than they really are or committing fraud in relation to the annual accounts;
- energy theft or fraud;
- selling residual materials from a project;
- creating unnecessary overtime to enable you to record more hours;
- appropriating company equipment of Stedin for personal use;
- failing to pay the full amount for lunch obtained from the canteen;
- appropriating residual or other materials from the workplace, warehouse or company vehicles for personal use;
- misusing authorisations;
- fraudulently recording hours, registering fewer hours of leave than were actually taken or making fraudulent sickness notifications;
- fraudulently logging working hours, e.g. claiming you worked from home when you did not, claiming you attended a training or other course/seminar when you did not or claiming you made a visit on behalf of the company when you did not.

## 5.2 Energy theft

As an employee of Stedin, it is entirely unacceptable for you to have any involvement whatsoever in anything to do with energy theft. An example would be setting up and operating illegal hemp plantations and rerouting of gas or electricity outside the meter. A zero-tolerance policy applies to any involvement in energy theft in any form, which could lead to instant dismissal.

## 5.3 Corruption and bribery

Bribery or other forms of corruption will not be tolerated. Corruption is when someone uses their position or the authority entrusted to them for personal gain. Bribery aims to encourage someone to do something, or refrain from doing something, that gives the briber an unfair advantage (in business or otherwise). For this reason, you must exercise caution when accepting and offering invitations or gifts. See also Articles 3.2.1 and 3.2.2 in this regard.

In some situations, this can constitute a criminal offence. When maintaining business relationships, you must always ensure that you act with honesty and integrity and that you do not appear to do otherwise. The main rules are as follows:

- You are not permitted to promise, offer or give any financial (or other) benefits in order to gain or retain projects. For this reason, we operate a set of rules governing the provision of gifts and event invitations to business contacts.
- You are not permitted to engage the services of external parties in order to sidestep the ban on bribery or corruption.
- You are not permitted to accept any benefits (financial or otherwise) offered to you for the purposes of gaining your favour and influencing you to award a project to the party in question.

## 5.4 Abuse of power

You are always expected to refrain from abusing your position in order to achieve personal or business gains.

As a Stedin employee, it is also up to you to help ensure social safety in the company and in the department.

Examples of abuse of power include:

- intentionally withholding information;
- repeatedly assigning unpleasant tasks to the same employee;
- asking somebody to break certain rules;
- unnecessarily transferring employees;
- threatening employees with dismissal;
- threatening employees with a negative appraisal;
- manipulating, stigmatising, gossiping about, ridiculing or besmirching individuals;
- using your position to blackmail, intimidate or exploit colleagues.

If your position requires to your appraise or otherwise evaluate colleagues, ensure that you always judge everyone's performance objectively.

## 5.5 Bullying

Bullying often builds up unnoticed. It can have severe consequences for the victim and creates a negative atmosphere in the workplace. What matters here is not only how the behaviour is intended but also how it is experienced. Therefore, you should put yourself in the other person's shoes.

Bullying will not be tolerated in any form.

Examples of bullying include:

- ridicule;
- persistent criticism;
- verbal abuse;
- physical attacks;
- threats;

- exclusion and isolation;
- making the work deliberately difficult or distributing it unfairly;
- practical jokes;
- spreading gossip and stigmatisation.

Such conduct can be an indication of bullying, especially if more than one of these examples applies.

## 5.6 Discrimination

We treat each other with respect, recognition and the understanding that everyone is equal. Discrimination is unacceptable and punishable by law. Discrimination means treating people differently, putting them at a disadvantage or excluding them based on certain personal characteristics. Stedin is acutely aware of its role in society and therefore champions diversity and inclusion with regard to our staff composition and societal stance. We do not discriminate on the basis of race, colour, gender, sex, sexual orientation, age, religion, political views, marital status, or national, ethnic or social origin.

Stedin is a diverse and inclusive company. We work in an environment with all kinds of different colleagues, but also customers and suppliers. Treat each other and communicate with each other as equals. After all, you would not want your colleagues to treat you differently because of certain characteristics. Accept each other's differences and work around them in a positive manner.

## 5.7 Sexual and other forms of harassment

Harassment is the act of influencing behaviour by deliberately discouraging, scaring, confusing, embarrassing, overwhelming or mocking someone or threatening them with negative consequences. These consequences can be physical (e.g. violence), although other types also exist. Sexual harassment is a type of harassment that involves all kinds of unwanted and sexually charged comments or attention. This could include asking intimate questions about someone's private life, making suggestive comments, mocking someone's sex or sexual orientation, or making sexually charged physical contact. Consider, for example, touching certain parts of someone's body 'accidentally'.

What matters here is not only how the behaviour is intended but also how it is perceived. Therefore, you should put yourself in the other person's shoes. Sexual and other forms of harassment will not be tolerated.

## 5.8 Intimidation and aggression

We have a social and legal responsibility to protect our employees against all kinds of aggression and violence. Intimidation and aggression create an unsafe working environment. Threats can be expressed in a variety of ways. Aggression does not necessarily constitute physical contact such as a push or hitting someone: you can also be verbally aggressive (e.g. by using abusive language, insults or vulgar comments). No type of intimidation or aggression will be tolerated, either by or against our employees. In the event of potential or actual conflict situations, always try to resolve them through open conversation that takes all parties' perspectives into account. Any conflict situations that are at risk of escalating must be reported immediately to your manager or the integrity and security hotline ([integriteit@stedin.net](mailto:integriteit@stedin.net)). You should also report any incidents involving customers or other parties. More information about this matter can be found in the [Guideline on Dealing with Intimidation and Aggression](#).

## 5.9 Alcohol, drugs and medication

The use of alcohol, drugs or other intoxicating or stimulating substances at work is strictly prohibited. In this regard, the term 'at work' refers to all customary working hours, including stand-by hours and on-call hours.

The use of alcohol or drugs before or after work is also prohibited in so far as it impairs your duties.

If you take medication that can impair your reaction capability or affect your work, then you are not permitted to perform any work that could have consequences for your own health and safety or that of others. In such cases, you must consult with the company doctor and your manager about your ability to work.

# 6. Who can you contact to ask questions or submit a report?

If you suspect any behaviour at Stedin that contravenes the principles of integrity, please speak to the parties involved about this conduct. If this would be difficult for you, ask a colleague, manager or HR adviser for advice about the best way to do this.

## Integrity Hotline

In addition, unacceptable or dishonest conduct can be reported to the Integrity Hotline, or you can contact a confidential advisor. These parties are bound by a duty of confidentiality, and you can ask them to submit a report anonymously. You can contact the Integrity Hotline via the intranet or at [integriteit@stedin.net](mailto:integriteit@stedin.net).

## Whistleblower procedure

The Policy Instruction on Reporting and Handling Integrity Incidents and Misconduct contains our whistleblower procedure, with an explanation of the situations in which employees can make a report, including anonymously, and how to go about this.

## Confidential advisers

Please see the intranet for the contact details of our [confidential advisors](#).

The [Policy Instruction on Reporting and Handling Integrity Incidents and Misconduct](#) can be found on the intranet and explains the entire process of dealing with integrity incidents.

## Legal position

Making a report does not affect your legal position. In other words, submitting a report in good faith will not result in any negative consequences for you in your capacity as an employee. However, deliberately submitting a false report in order to damage a colleague's reputation can result in negative consequences for you.

If you have any further questions about this matter, feel free to contact the compliance officer, whose contact details can be found on the intranet.

# 7. Consequences of code of conduct violations

If employees fail to comply with this code of conduct, this can have serious consequences for Stedin. In case of a suspected violation, the Compliance & Integrity department will investigate the allegation and carry out an interview with the employee. The nature and severity of a violation will determine the actions taken by HR against the employee. In the event of very serious and/or repeated violations, Stedin may decide to dismiss the employee in question (with or without immediate effect).

## Seeking advice

If you as an employee are in doubt about the interpretation or application of this code of conduct, please seek advice from your manager or HR adviser, who can then consult with the compliance officer.

## Cooperating with investigations

To assist with the enforcement of this code of conduct, you may be obliged to provide information to the compliance officer.





## 8. In conclusion

This code of conduct provides tools to help you establish the right course of action and to create clarity regarding what type of conduct is absolutely unacceptable. Although it is not possible to include an exhaustive list of examples of appropriate and inappropriate conduct, this does not constitute an excuse for inappropriate conduct. Always act in the spirit of this code of conduct and be aware of your responsibilities.

We must all work together to create a pleasant working environment. Take responsibility at all times. Use this code of conduct to guide you towards the right decisions, and talk to each other if you observe any situations that do not seem right.

The Board of Management,

Stedin Group

