



# Supplier Code of Conduct Stedin Group

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## Inhoudsopgave

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# 1. Introduction

At Stedin Group, we are committed to fostering sustainable, equitable, and transparent partnerships. As a grid operator, we recognize our vital role in ensuring a safe, reliable, and future-ready energy supply. This responsibility extends beyond our internal operations to encompass our relationships with suppliers and partners throughout the supply chain.

We focus on a future with new energy and work every day towards an environment where both current and future generations have access to sustainable energy. By building faster, utilizing our network efficiently, and managing it responsibly, we contribute to making the Netherlands more sustainable. We know that how we achieve our goals is just as important as the goals themselves, and that we can only do this together with our suppliers.

This Supplier Code of Conduct provides clear guidelines for responsible, sustainable, and ethical business practices. It outlines the standards we wish to share with our suppliers. By adhering to these principles, we build a long-term partnership where sustainability and corporate social responsibility are central.

For more information on human rights, please refer to our human rights policy on our website.

## 1.1. International Standards for Responsible Business Conduct

This Supplier Code of Conduct is based on internationally recognized standards for responsible business conduct, including the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights, the Universal Declaration of Human Rights, and the International Labor Organization's core conventions. It also aligns with the sustainability objectives outlined in the EU Taxonomy Regulation. Together, we can advance our values and contribute to the broader European sustainability agenda.

## 1.2. Definitions

**Suppliers:** Any external party that provides goods, services, or other business activities to Stedin Group.

**Code of Conduct:** When this document refers to the code of conduct, we mean the supplier code of conduct.



## 2. Speak Up/ Wistleblower policy

Suppliers establish secure and confidential channels for employees to report concerns, including violations of laws, ethical standards, or human rights. These mechanisms should ensure anonymity wherever possible and safeguard whistleblowers from retaliation. Suppliers can report complaints regarding the Procurement Act 2012 according to the Stedin Complaints Committee Regulations.

## 3. Business ethics

Suppliers uphold the highest standards of ethical conduct, actively combat bribery, corruption, extortion, and fraud, and implement robust risk mitigation measures to address these challenges. They conduct checks to prevent conflicts of interest and ensure transparent records of payments and transactions. Information about working conditions, environmental impact, and performance is publicly shared in accordance with laws and regulations. Intellectual property and confidential information are protected and used responsibly. Anti-competitive practices such as cartel formation and price-fixing are prohibited. Conflicts of interest are reported, and raw materials are sourced responsibly with transparent documentation to prevent human rights violations. Finally, our suppliers protect the data of employees, customers, and partners. Personal data is carefully managed in accordance with relevant privacy legislation.

## 4. Labor

Suppliers comply with international and national regulations and labor standards, such as the ILO Conventions (No. 138 and No. 182). Forced labor, child labor, discrimination, harassment, and unsafe working conditions are not permitted. Employees must be guaranteed fair remuneration, clear employment terms, and a safe and dignified working environment in line with international labor standards." Suppliers must also respect the right of employees to associate and bargain collectively without fear of reprisal. For more information, see Stedin's Human Rights Policy.

## 5. Health and safety

Suppliers ensure a safe and healthy working environment, fully compliant with all applicable national and international safety and health regulations. This includes developing emergency response plans, addressing occupational hazards, and ensuring that employees can recognize and avoid hazardous situations without fear of retaliation or adverse consequences. Suppliers must manage the risks of exposure to chemical, biological, and physical elements, ensure the safe use of machinery, and evaluate and mitigate the risks of physically demanding work. All areas of the supplier or their subcontractors must be clean, safe, and spacious enough to ensure health and well-being. Employees must be trained in health and safety risks in a language they understand, and important information must be visibly posted in the workplace. For more information, see Stedin's Human Rights Policy.

## 6. Environment

### 6.1. Environmental permits and reporting

Suppliers comply with all relevant environmental laws and regulations, maintaining the required permits and licenses. They establish systems to monitor compliance and proactively take measures to reduce their environmental impact.

### 6.2. Pollution prevention

Suppliers prevent waste and emissions through efficient processes, recycling, and responsible use of natural resources. They promote the efficient use of water, energy, and raw materials to protect biodiversity and ecosystems.

### 6.3. Hazardous substances

Suppliers manage hazardous substances and chemical waste carefully. They ensure proper identification, labeling, and safe use, storage, transport, recycling, and disposal. The production and processing of hazardous waste must be fully recorded and documented.

### 6.4. Waste

Suppliers actively seek ways to reduce waste and reuse products at the end of their lifecycle. They monitor waste and emissions and use efficient, environmentally friendly technologies to minimize their impact.

### 6.5. Air emissions

Suppliers monitor air emissions and apply modern emission control techniques. Emissions are controlled and treated in accordance with applicable legislation to effectively reduce air pollution.

### 6.6. Reducing material

Suppliers contribute to sustainable resource management and waste reduction, in line with our joint commitment to a circular economy. They comply with all relevant laws and regulations and customer requirements for restricting or excluding certain substances in products and production processes. Harmful substances are limited.

### 6.7. Watermanagement

Where applicable, suppliers implement a water management program that carefully documents and monitors sources, usage, and discharge of water.

### 6.8. Energy and greenhouse gases

Suppliers set and adhere to goals for reducing greenhouse gas emissions. This means that energy consumption and CO2 emissions in Scopes 1, 2, and, where relevant, Scope 3 are carefully tracked, documented, and publicly reported. Suppliers actively seek ways to improve their energy efficiency and adopt measures to minimize energy consumption and greenhouse gas emissions across their operations.

## **7. Management systems**

### **7.1. Commitment from supply chain partners**

Suppliers implement due diligence processes to identify, mitigate, and where possible, remediate risks related to human rights and environmental impacts. This responsibility involves suppliers actively identifying potential risks, taking proactive steps to mitigate them, and working with relevant stakeholders to ensure necessary improvements.

### **7.2. Accountability and responsibility of management**

The management of the Supply Chain department within Stedin Group holds responsibility for implementing, monitoring, and revising this code of conduct in alignment with evolving circumstances. The Board of Directors conducts regular evaluations to ensure the effectiveness and relevance of this code of conduct, making necessary adjustments to drive continuous improvement.

### **7.3. Risk Assessment and risk management**

Suppliers establish and maintain robust processes to identify risks related to legal compliance, environmental impact, labor conditions, and ethical business practices. They evaluate the severity of these risks and implement targeted measures to mitigate them effectively.

### **7.4. Communication**

Suppliers embed the principles of this code of conduct into their operations and actively communicate them to employees and subcontractors. They report transparently on their impact on the environment, health, and safety. Stedin Group maintains regular dialogue with suppliers to align on expectations and foster collaboration regarding this code of conduct.

### **7.5. Employee/stakeholder engagement and access to remedies**

Suppliers provide training and engagement sessions for employees and stakeholders on the standards and expectations outlined in this code. Each supplier designates one or more ESG representatives who are knowledgeable about joint ESG commitments and ensure their implementation. They maintain open lines of communication with all stakeholders and, if necessary, organize meetings to discuss current topics and gather feedback.

### **7.6. Investigations, assessments and audits**

Suppliers self-monitor their compliance with this code of conduct and report any violations. Stedin Group holds regular meetings with suppliers, conducts risk-driven investigations, and performs audits when necessary. Independent external auditors may also be engaged, and suppliers are expected to provide full cooperation. See Stedin's General Purchasing Conditions for more information.

### **7.7. Corrective action process**

Suppliers report any violation of this code through designated channels. Stedin Group investigates reported violations and collaborates with suppliers to determine and implement corrective actions. Severe violations may result in the suspension or termination of the partnership, subject to the decision of the Board of Directors.

### **7.8. Documentation**

Suppliers maintain accurate documentation to demonstrate compliance with relevant legislation and this code of conduct. These records assist in monitoring and evaluation, with attention to confidentiality and privacy.

### **7.9. Responsibility of supply chain partners**

Suppliers apply the principles of this code of conduct and communicate them to their employees and, where possible, to their subcontractors. Additionally, suppliers ensure that management and employees within their organization are aware of and comply with this code of conduct.

## **8. Building the future together**

At Stedin Group, we work with dedication and pride towards a world full of new energy. Together with our suppliers, we use our expertise to make a valuable contribution to our mission every day. With a forward-looking perspective, we continue to innovate, improve, and develop innovative solutions for societal and sustainable challenges.

This Supplier Code of Conduct forms a solid foundation for our shared responsibility and clear guidelines. By working together based on shared values, we strive to create a sustainable future and ensure a resilient and reliable energy supply chain equipped to meet future challenges.