



# ENERGINET - CODE OF ETHICS



Deviations to this Code are to be registered in the deviation system  
If full anonymity is wanted, use the Whistleblower system  
(<https://energinet.whistleblownetwork.net>)



# ONE-PAGER OF ETHICAL PRINCIPLES

At Energinet, we have established fundamental values of social responsibility and ethical behavior. We are ethical in our approach to work assignments, cooperation and surroundings.

This document describes Energinet's Code of Ethics in practice, and all employees (including external consultants) at Energinet must comply with the Code of Ethics. We expect all employees to report any behavior that is not in compliance with the Code of Ethics.

## 1. Transparency and law-abiding

At Energinet, we are transparent with our activities, we abide the law, internal policies and guidelines.

## 2. Bribery and corruption

At Energinet, we do not accept any kind of corruption or bribery, regardless of whether it is to Energinet's or others' advantage. We report all incidents of bribery and corruption including cases of doubt.

## 3. Sponsorships and donations

At Energinet, we do not sponsor or make donations as it can be perceived as discriminatory practice, bribery or an attempt to bias the recipient's judgement.

## 4. Gifts, travels and entertainment

At Energinet, we are on equal terms with other public employees thus we can not accept any given form of gifts or representation by default. We do not encourage giving or receiving any given form of gifts and do not accept gifts sent to our private address.

## 5. Anti harassment

At Energinet, we embrace mutual trust and respect, thus we do not accept any kind of harassment, scorn, humiliation, bullying, misconduct or infringement of individuals. We are aware that some actions can be acceptable in some cultures and not in others.

## 6. Discrimination

At Energinet, we believe in equality. We respect all individuals and treat each other with dignity and respect. We do not discriminate, regardless of backgrounds or personalities.

## 7. Climate and environment

At Energinet, we manage our resources in accordance with our purpose of the green transition. We take environmental consequences into consideration when making decisions and we commit to improve our use of resources and reduce waste and pollution in all activities.

# ABOUT ENERGINET'S CODE OF ETHICS

Energinet's Code of Ethics describes how we act towards each other and our surroundings. In relation to our fundamental values of social responsibility and ethical behavior, we are ethical in our approach to work assignments, cooperation, all people and surroundings.

The Code of Ethics only includes rules that are an addition to current laws and regulations that Energinet already follows. The Code of Ethics applies for all parts of Energinet and all employees (including external consultants) at Energinet or any subsidiary must comply with the Code of Ethics.

Any misconduct of the Code of Ethics can have severe consequences for our organization or employees. Misconduct can harm Energinet's reputation and can be sanctioned with significant fines. For employees, misconduct of the Code of Ethics can ultimately imply legal proceedings or termination of employment depending on the degree of misconduct.

*Furthermore, Energinet has a separate Code of Conduct for suppliers, which all suppliers need to comply to.*



# TRANSPARENCY AND LAW-ABIDING

At Energinet, we are transparent with our activities, we abide the law, internal policies and guidelines. Thus, we can act as a trustworthy business partner and representative for our owner.

## We expect from you:

- That you read, understand and follow the Code of Ethics
- That you report any behavior or incident that is not in compliance with the Code of Ethics.



# BRIBERY AND CORRUPTION

At Energinet, we do not accept any kind of corruption or bribery, regardless of whether it is to Energinet's or others' advantage.

This means that we at Energinet, do not accept any given form of bribery, extortion or blackmail which includes giving, receiving, encourage or insinuate respectively a reward or punishment e.g. receiving presents from suppliers, consultants etc.

This applies to both directly or indirectly actions in relation to the above mentioned areas regardless of cultural or local business practice. Furthermore, this also includes misuse or misconduct of information that one will benefit from, without having access to the information in another way.

## We expect from you:

- That you report any incident of bribery or corruption, including in cases of doubt.

# GIFTS, TRAVELS AND ENTERTAINMENT

At Energinet, we are on equal terms with other public employees, thus we can not accept any given form of gifts or representation that can be considered as bribery.

We do not encourage giving or receiving any given form of gifts and do not accept gifts sent to our private address.

## We expect from you:

- That you do not encourage anyone to give gifts.
- That you do not receive gifts sent to your private address.

*Occasional gifts, gifts for hosting or presenting can be accepted if it is of insignificant value. All other gifts must be refused or returned.\**

If in doubt, contact Group Legal Affairs (Koncernjura).

\* See recommendations for public employees at [God adfærd i det offentlige](#) (in Danish only).

 Read more about receiving gifts in the handbook for employees.

# SPONSORSHIPS AND DONATIONS

As well as we do not accept gifts at Energinet, we do not sponsor or make donations to associations, clubs etc., as it can be perceived as discriminatory practice, bribery or an attempt to bias the recipient's judgement.

Financing activities that can be considered relevant in relation to Energinet's purpose, can be made with approval from the executive board.



If in doubt, contact Group Legal Affairs (Koncernjura).

# ANTI HARRASMENT

At Energinet, we embrace mutual trust and respect, thus we do not accept any kind of harassment, scorn, humiliation, bullying, misconduct or infringement of individuals, including sexual harassment.

## We expect from you:

- That you are aware that some actions can be acceptable in some cultures and not in others.
- That you react and/or report, if you experience or observe any sort of harassment, bullying or misconduct.



# DISCRIMINATION

At Energinet, we believe in equality. We respect all individuals and treat each other with dignity and respect, and we do not discriminate under any circumstances. Thus, we ensure justice and equality for all, promote talent and counteract discrimination.

Furthermore, we recognize the freedom of unions and associations and the right to bargain collectively.

## We expect from you:

- That you treat all your colleagues at Energinet with dignity, respect and responsibly.
- That you do not discriminate on the basis of race, gender, nationality, religion, social or ethnic background, political or other views, age, handicaps, special needs, ethnicity, fortune, sexual orientation or status.
- That you react and/or report if you experience or observed any sort of discrimination.

# CSR – CORPORATE SOCIAL RESPONSIBILITY

At Energinet, we are UN Global Compact signatory, meaning we follow the international recognized principles of the UN Global Compact for corporate sustainability.

The principles are important values at Energinet when working with sustainability in the following areas:

- Climate and environment
- Human rights
- Social sustainability
- Bribery and anti-corruption

At Energinet, we also expect our suppliers to act according to the principles of the UN Global Compact, which also are described in Energinet's Supplier Code of Conduct.

## We expect from you:

- That you read and understand Energinet's CSR policy.



# CLIMATE AND ENVIRONMENT

At Energinet, we work towards 100% green transition of the energy system and a more sustainable world. Therefore, we want to ensure our impact on the climate and environment is as responsible as possible.

Every day, we work with designing, maintaining, developing and expanding energy systems that will make it possible to use renewable energy for everything. In Denmark and globally

At Energinet, we manage our resources in accordance with our purpose of the green transition to slow down climate change. We invest under careful considerations and as responsible as possible.

At Energinet, we take environmental consequences into consideration when making decisions and we commit to improve our use of resources and reduce waste and pollution in all activities.

## We expect from you:

- That you keep a curious mindset and encourage environmental and climate considerations in all business activities, investments and innovations.
- That you contribute with your knowledge, opinions and experiences to better our environmental and climate considerations.





# DEVIATIONS AND QUESTIONS

## Who to contact?

If deviations or misconduct of the Code of Ethics have surfaced, they need to be registered and processed through Energinet's deviation system and a briefing of the Director of group legal affairs. If you want to stay anonymous, use Energinet's whistleblower system.

If you have any questions regarding the Code of Ethics, you can contact Group Legal Affairs – department of Sustainability and Compliance.

## Revisions

NO.	NAME	VERSION	DATE
18/06885-2	Draft in review at KDG	0.1	20.01.2021
18/06885-2	Revised after review sent for approval at KDG	0.2	03.02.2021
18/06001-9	Approved by KDG	1.0	08.02.2021
18/06001-9	Revised after review by RRU (editorial changes only)	1.1	19.05.2021