

CODE OF CONDUCT FOR BUSINESS PARTNERS

INTRODUCTION

The objective of Energinet's Code of Conduct for Business Partners

This Code of Conduct for Business Partners (hereafter referred to as Code of Conduct) forms the foundation of Energinet's engagement with suppliers, sub-suppliers, collaboration partners and business partners (hereafter referred to as Business Partners), outlining expectations and promoting open dialogue about their ethical, social, and environmental performance.

Energinet follows the OECD's Guidelines for Multinational Enterprises, which means that Energinet carries out due diligence for Business Partners, to identify and mitigate potential and actual risks. Based on risk assessment, continuous monitoring takes place to ensure that Business Partners adhere to this code of conduct.

Expectations and compliance of Business Partners

Energinet expects their Business Partners, to adhere to Energinet's Code of Conduct, and thus demonstrate social responsibility that creates value for both the company and the society. This entails managing and taking accountability for the social impacts arising from or can be linked to, stakeholders' actions and business activities.

Business Partners must always adhere to applicable national laws, rules and regulations. They should also think and act in accordance with recognized principles of human rights, labor rights, climate and environmental protection and anti-corruption, demonstrating respect and compliance in accordance with:

- The ten principles in the UN Global Compact,
- International Bill of Human Rights, below:
 - The UN Universal Declaration of Human Rights
 - The UN International Covenant on Economic Social and Cultural Rights
 - The UN International Covenant on Civil and Political Rights
- The ILO's Core Conventions, (no. 29, 87, 88, 100, 105, 111, 138, 155, 182 and 187)
- The UN Convention on the Rights of the Child,
- The UN Convention against Corruption,
- The UN Guiding principles on business and human rights

If this Code of Conduct sets a higher standard than the local laws and regulations in a given country, the standard outlined in this Code of Conduct must be followed.

To fulfill the contract, Business Partners must demonstrate both the ability and willingness to implement an ongoing due diligence process, aligned with the OECD's Guidelines for Multinational Enterprises and the OECD's due diligence guidelines on responsible business conduct, or equivalent.

The due diligence process requires Business Partners to systematically investigate, actively identify, and prevent the risk of violations of the internationally recognized guidelines outlined in the Code of Conduct, concerning all business activities.

The due diligence process must incorporate both potential and actual negative impacts that Business Partners may cause or contribute to through their own activities, as well as those directly linked to their operations, products, or services via their business relationships. In this context, Business Partners are required to promptly notify Energinet of any changes or incidents affecting their compliance with this Code of Conduct.

We acknowledge that the level of maturity may vary, but we expect all Business Partners to demonstrate continuous improvement.

HUMAN RIGHTS AND LABOUR RIGHTS

Energinet has a goal of promoting human rights and expects the same from its Business Partners. Therefore, it is important to emphasize that Energinet will not do business with anyone that is involved in, or benefit from, the violations of human rights. Business Partners must support and respect the protection of internationally declared human rights specified in the International Bill of Human Rights.

Additionally, Business Partners must support and respect the protection of workers in accordance with ILO conventions. The following sections provide further details on those conventions, but they are not exhaustive:

Forced labour

ILO-CONVENTION NO. 29 AND 105

There must be no form of forced, bonded involuntary, or prison labor. Workers should be free to leave the workplace at the end of each workday and must not be required to submit deposit or identity papers to their employer. Additionally, workers should have the rights to terminate their employment with reasonable notice.

Freedom of association and the right to collective bargaining

ILO-CONVENTION NO. 87 AND 98

Workers have the right to join or establish trade unions of their choice and to engage in collective bargaining. Business Partners must not interfere with, or hinder, the formation of trade unions or collective bargaining activities.

Employee representatives must not face discrimination or obstruction in carrying out their duties within the workplace.

Child labour

THE UN CONVENTION ON THE RIGHTS OF THE CHILD AND ILO-CONVENTION NO. 138 AND 182

The minimum age for employees must be at least 15 years and must not be lower than the legal age for compulsory school attendance. However, light work may be permitted for children aged 13 – 15, provided it does not harm their health and development, or interfere with their compulsory education.

Recruiting child labor in violation of relevant ILO conventions is unacceptable. If child labor, as described above, is already taking place, continuous efforts must be made to rectify this issue promptly. Affected children must be ensured the opportunity to earn a living, as well as an opportunity to acquire an education until they are no longer under the age for compulsory schooling.

Children under the age of 18 must not engage in work that could harm their health, safety or morals, or negatively impact their psychological, mental or moral development. This includes work that interferes with their education or involves night shifts.

Discrimination

ILO-CONVENTION NO. 100 AND 111

There must be no discrimination in terms of employment, remuneration, access to education, promotion, dismissal, or retirement based on ethnicity, nationality, language, religion, caste, age, disability, gender, marital status, sexual orientation, trade union activities, social or political affiliation, or other beliefs.

Working environment and safety

ILO-CONVENTION NO. 155 AND 187

Healthy and safe working environment must be ensured, based on current knowledge of the industry and its specific risks. Hazardous chemicals and other substances must be handled carefully. Sufficient measures must be established to prevent and avoid the possibility of accidents, or health problems, that may arise from or related to, workplace conditions.

There must be access to clean sanitary facilities and safe drinking water. Where relevant, the employer must also ensure access to safe food storage.

If the employer provides accommodation to employees, it must be clean, safe, sufficiently ventilated and with access to clean sanitary facilities and safe drinking water.

Working hours and wages

Energinet expects its Business Partners to adhere to ILO conventions no. 1, 14 and 131 regarding working hours and wages.

Mining of conflict minerals

The following minerals are classified as conflict minerals: tantalum, tin, tungsten and gold. Energinet expects its Business Partners to adhere to the OECD's due diligence guidelines for responsible supply chains in conflict-affected and high-risk areas.

Business Partners are required to report the use of conflict minerals in their products and throughout the entire value chain.

This can be done by completing a Conflict Minerals Reporting Template (CMRT), a free standardized reporting form developed by the Responsible Minerals Initiative (RMI).

CLIMATE AND ENVIRONMENT

Preventive measures

Energinet expects its Business Partners to work systematically to prevent and minimize the environmental impacts of its activities, including prevention of pollution, ensuring sustainable use of resources, mitigating climate change and adaptation and protection of the environment, biodiversity and the restoration of natural habitats, protection of water and marine resources and improving the performance of other parties within its sphere of influence through a proactive approach and responsible management of their environmental factors.

Energy consumption and climate change

Energinet expects Business Partners to take measures to reduce energy consumption and greenhouse gas emissions, and where possible, prevent them. Greenhouse gases are defined as the six greenhouse gases covered by the Kyoto Protocol – carbon dioxide, methane, dinitrogen oxide, perfluorocarbons (PFCs), hydrofluorocarbons (HFCs) and sulphur hexafluoride (SF₆).

Energinet expects Business Partners to monitor their emissions and take measures to reduce the amount and number of pollutants, where possible. Typical air pollutants include nitrogen oxides, sulphur dioxide, carbon monoxide, small particles, volatile organic compounds (VOCs) such as benzene, and metals such as lead. Emissions of dioxins and pollutants that cause ozone depletion, such as HCFCs, should also be given attention. Specifically, Energinet has a published goal of phasing out SF₆ gas, and therefore expects Business Partners to work actively to phase this out.

Energinet expects all Business Partners to take immediate action to protect the environment and human health if any situation arises in relation to stakeholders work that threatens these.

ANTI-CORRUPTION AND ECONOMIC RESPONSIBILITY

Corruption, bribery, fraud and grease payments

Energinet does not accept corruption, regardless of its beneficiaries. Energinet does not accept bribery or extortion, whether through giving, receiving, encouraging, or implying any form of reward or punishment. These principles apply directly and indirectly through third parties, regardless of whether such practices are considered customary in local business contexts.

Employees of Energinet, like public sector employees, are prohibited from accepting gifts or benefits that could be perceived as bribes. This encompasses any improper use of information to provide an advantage to individuals who would not otherwise have access to it. Energinet requires Business Partners to refrain such practices and implement measures, to ensure that all stakeholders avoid such practice as well.

Trade with sanctioned products, companies and countries

Energinet strictly adheres to UN and EU trade sanctions and has established procedures to ensure compliance. Energinet expects its Business Partners to follow the same standards.

Responsible political involvement, charity and sponsorships

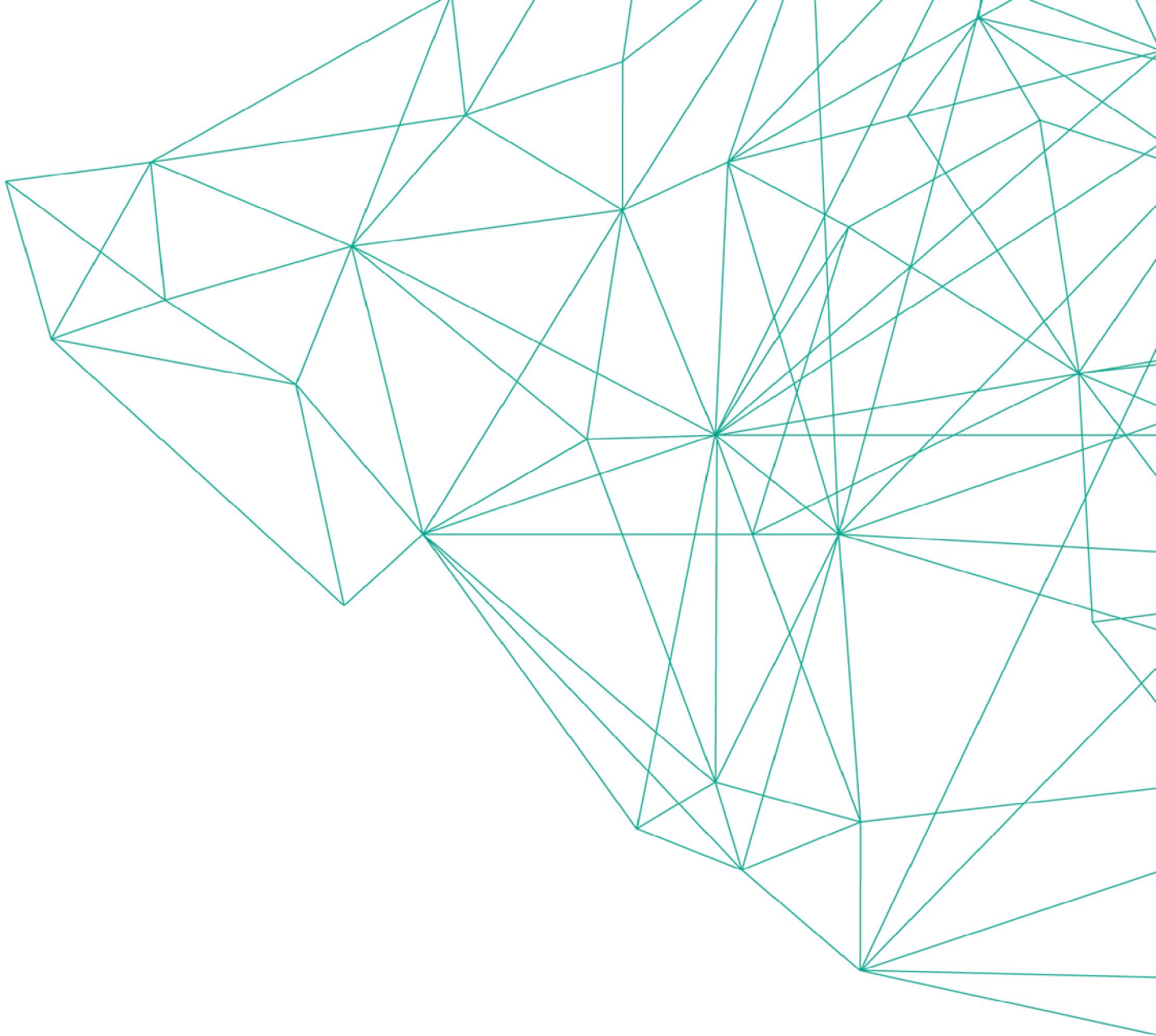
Energinet expects its Business Partners to ensure that any direct or indirect political contributions, charity donations, and/or sponsorships are never used as a form of bribery in addition of being conducted with full transparency.

COMPLAINT MECHANISM

Energinet provides a whistleblower scheme accessible via the following link: [Whistleblower \(energinet.dk\)](#).

Through Energinet's whistleblower scheme, all employees, Business Partners, and other stakeholders can report legal or ethical irregularities, without fear of reprisal. Reports can be made anonymously and will be handled confidentially and professionally.

Business Partners must provide access to this complaint mechanism, for anyone impacted by their activities, and must acknowledge the right to seek remediation



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