

Supplier code of conduct

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INTRODUCTION

Ambitions and core values

As a national public energy company, EBN is actively committed to achieving a sustainable, reliable, and affordable energy supply for citizens and businesses in the Netherlands. We work to ensure energy security and accelerate sustainability. We do this transparently. We ask for input and are clearly accountable to our stakeholders. We involve citizens and communities in decision-making whenever possible and act in the public interest, from the perspective of broad societal value creation.

EBN strives for a culture focused on promoting clarity, entrepreneurship, energetic connection, and dedication to the public cause. These underlying principles are laid down in our core values concept *EBN ACTS* (in Dutch: *EBN DOET*):

Apply our knowledge and take a clear stand
Connect partners and collaborate energetically
True and dedicated to the public cause
Spirited by entrepreneurial projects and chains

Supplier Code of Conduct

We expect from parties working for us to behave in a manner consistent with our ambitions and core values. To make these expectations concrete, we have created this EBN Supplier Code of Conduct ("Code of Conduct"). The Code of Conduct is applicable to every agreement the supplier enters into with EBN. The supplier complies with all provisions of this Code of Conduct and ensures that its employees comply with them. In some cases, these provisions go beyond what is prescribed by national or international laws and regulations. It goes without saying, that the supplier complies with all laws and regulations.

The term employee refers to anyone who works for or on behalf of the supplier: as an employee, on a secondment basis, through a service provider, as a self-employed person, as an intern or otherwise.

Language

In the event of any conflict or discrepancy between this Supplier Code of Conduct in the Dutch language and any translations thereof, the Dutch version shall be binding.

Supply Chain

The supplier makes reasonable efforts that the Code of Conduct is complied with in its own supply chain.

Potential Non-Compliance, Contact, and Audit

In case the supplier suspects non-compliance with the Code of Conduct, it can contact EBN. Together, and while maintaining each party's responsibility, we can determine how best to address the situation.

In case EBN reasonably suspects the supplier to be non-compliant with the Code of Conduct, the supplier provides the requested information upon EBN's first request. In that case, EBN may conduct an audit on the suspected instance of non-compliance or request the supplier to have an independent audit conducted on the suspected instance of non-compliance and to share the findings with EBN.

Consequences of Non-Compliance

In the event of non-compliance with one or more provisions of the Code of Conduct, EBN may terminate the agreement(s) with the supplier in whole or in part with immediate effect.

A. PEOPLE AND THE ENVIRONMENT

Human Rights

The supplier conducts its activities in a manner that respects human rights. In this way, the supplier honours the intrinsic value of every person. The supplier complies with all national and international laws, regulations, and guidelines, including the Universal Declaration of Human Rights and, where applicable, the OECD Guidelines for Multinational Enterprises on Corporate Social Responsibility. When applying the aforementioned OECD Guidelines, the supplier has a system in place for conducting due diligence on parties the supplier enters into a partnership with.

Good Employment Practices

The supplier does not make use of child labour or any form of forced labour. Employees have the right to terminate their employment voluntarily and with reasonable notice. They have the right to join a trade union or organise themselves independently. The supplier pays employees at least the statutory minimum wage or the prevailing living wage, whichever is higher. Where a collective bargaining agreement applies, the supplier pays employees at least the collectively agreed wage. The supplier pays wages in full and on time. Working hours, including overtime, meet legally prescribed standards. Overtime is voluntary and is appropriately remunerated.

Safe working environment, diversity, and inclusion

The supplier provides for a socially and psychologically healthy and safe working environment. Diversity and inclusion are closely linked to a safe working environment. Diversity refers to a variety of gender, age, origin, religion, beliefs, political affiliation, culture, colour, sexual orientation, ideas, backgrounds, and working methods. Inclusion is accepting and utilising those differences. In doing so, the supplier also promotes participation: this way, all employees can participate fully. The supplier does not tolerate inappropriate behaviour by or among employees, including sexual, physical, and verbal intimidation or aggression, humiliation, bullying, and discrimination on any grounds whatsoever.

Physical Safety

The supplier ensures healthy and safe working conditions with regard to physical safety. A key element of this is the implementation of procedures for: structured risk identification and evaluation, conducting risk analyses for specific activities (e.g., high-risk activities), and reporting, investigating, and learning from risks and accidents, where relevant, in collaboration with other parties. Other important elements include *inter alia* the provision of information and training in everyday language about safe working practices and workplace hazards, the use of protective equipment where relevant, and a ban on the use of alcohol or drugs shortly before and during working hours. Employees have access to clean water, sanitation, rest facilities, and, where relevant, adequate housing.

Surrounding area, Environment and Climate

The supplier acts sustainably and with due regard for the surrounding area, the environment, and the climate. Possible inconvenience to local residents caused by its operations is avoided or minimised as much as possible. With regard to the environment and climate, the supplier strives for the efficient use of natural resources, such as water, energy, and raw materials, minimises CO₂, nitrogen, and pollutant emissions, cares for biodiversity, and promotes reuse and recycling. Waste, particularly hazardous waste, is disposed of and processed responsibly.

B. FAIR BUSINESS

Bribery, Fraud, and Insider Trading

The supplier does not accept any form of active or passive bribery, or fraud. All transactions are conducted transparently and are fully and accurately accounted for in the financial records. Neither the supplier nor its employees are involved in (facilitating) insider trading.

Conflicts of Interest

The supplier avoids and mitigates existing and potential conflicts of interest, as well as situations that could reasonably be perceived as such. Unreported (potential) conflicts of interest may harm the supplier and (indirectly) EBN, but may also have consequences for the employees involved.

Business Gifts and Invitations

Accepting or offering business gifts or invitations to external events must never be done to obtain or provide any advantage. It is important to avoid any appearance of doing so, both with the other party and with third parties. The supplier may only accept or offer business corporate gifts or invitations, directly or indirectly, if (a) it does not involve (attempted) bribery or fraud and does not lead to a (potential) conflict of interest, (b) it fits within the business context, (c) it is incidental, and (d) the items accepted or offered are of an appropriate nature and of limited value. Cash must never be accepted or offered.

Money laundering and terrorist financing

The supplier is not involved in (facilitating) money laundering or terrorist financing.

Import and Export

The supplier complies with all laws and regulations regarding all imports and exports of *inter alia* goods, technology, and software. Upon request, the supplier provides EBN with all requested information regarding *inter alia* the aforementioned topics.

Fair Competition and Handling of Information

The supplier refrains from anti-competitive activities, such as unlawful price-fixing, market sharing, or the unauthorised sharing of confidential or commercially sensitive information. Where relevant, the supplier complies with tender regulations. The supplier respects the industrial and other intellectual property rights of EBN and other parties. The supplier respects the privacy of all individuals, and, with regard to the handling of personal data, acts in accordance with the General Data Protection Regulation (GDPR).