

TransnetBW

# CODE OF CONDUCT FOR BUSINESS PARTNERS

Version 2.0

# INTRODUCTION OF THE EXECUTIVE BOARD

As a transmission system operator, TransnetBW has a great responsibility towards the economy and society in the state of Baden-Württemberg and is making an important contribution towards a successful energy transition in Germany, now and in the future. We strive to conduct our business in an economically and environmentally sustainable manner. Sustainability is an integral part of our self-concept and our corporate strategy. We also want to avoid risks that could cast any shadow on the reputation and integrity of TransnetBW and cause damage to the company, the employees as well as our business partners, customers or society and the environment as a whole.

We are aware that there can potentially be negative effects on people and the environment within our supply chain. We strive to limit these effects and to meet this responsibility together with our business partners. We act in accordance with the UN Global Compact, the UN Guiding Principles on Business and Human Rights, as well as the Paris Climate Accords.

The principles set out in this Code of Conduct for Business Partners reflect our high standards for responsible corporate governance, which all employees, managers, and the Board at TransnetBW adhere themselves.

It is TransnetBW's objective to adhere to the principles set out in this Code of Conduct for Business Partners and to implement them along the entire value chain. We expect from you, as our business partner, that you, in turn, exert your influence on your subcontractors and uphold the requirements listed in this code of conduct together with them.

Together with you, we want to build a trusting and lasting business relationship based on this Code of Conduct for Business Partners.

We are counting on your support!



Dr. Werner Götz



Michael Jesberger



Dr. Rainer Pflaum

# SCOPE

This Code of Conduct for Business Partners is binding for all business partners of TransnetBW. Subcontractors commissioned by these partners in connection with the business relationship with TransnetBW, regardless of the type of collaboration are also bound by this Code of Conduct for Business Partners. We expect our business partners to take reasonable measures to ensure that their suppliers and subcontractors also meet the requirements set out herein.

This Code of Conduct is an integral part of the business relationship between the business partner and TransnetBW.

The most recent version of the Code of Conduct for Business Partners shall apply. TransnetBW reserves the right to update, replace, or modify this Code of Conduct for Business Partners at any time without giving a reason.

# GENERAL PRINCIPLES

As a business partner of TransnetBW

- / you commit to complying with all relevant legislation, legal provisions and, at a minimum, the principles set out hereinafter.
- / you ensure that your employees as well as your subcontractors know and adhere to the principles listed in this code of conduct.

# INTEGRITY AND COMPLIANCE

As a business partner of TransnetBW

- / you conduct your business activities with integrity and in a highly ethical manner and you ensure fair competition. You know and comply with anti-corruption and antitrust law in your jurisdiction.
  
- / your actions and decisions are not influenced by considerations that are extraneous to the matter or by personal interests. Potential conflicts of interest are to be avoided and must always be disclosed to TransnetBW without delay.
  
- / you commit not to offer, promise, grant, demand, or accept, whether directly or indirectly, presents, payments, invitations, or other benefits, if such actions could create the impression that decisions may be unduly influenced. Gifts, payments, invitations, or other benefits offered to holders of office must not exceed usual hospitality (e.g. refreshments).
  
- / you guarantee to adhere to a standardised and structured process when starting business relationships with new subcontractors. In this context, the potential and the ability of the subcontractor, in particular with regard to technical, commercial as well as ethical, sustainability and quality aspects must be assessed as well as reliability in terms of a timely delivery.

# HUMAN RIGHTS AND WORKING CONDITIONS

As a business partner of TransnetBW

- / you respect and support international human rights standards and are not involved in any breaches of human rights. You must ensure that employees or persons involved in the business activity are not subjected to slavery or other involuntary work, verbal, psychological, sexual and/or physical violence, assault or harassment of any kind.
- / you do not tolerate child labour, pursuant to the ILO Convention.
- / you ensure appropriate occupational health and safety standards for your employees and subcontractors, in compliance with all applicable laws and regulations.
- / you take appropriate measures against any type of discrimination and unequal treatment. Every employee is treated with respect and dignity. In particular, no employee is discriminated against due to their gender, race, disability, regional, ethnic, social or cultural origin, religion, age, political opinion, membership in an employees' organisation, sexual identity or other personal traits.
- / you respect your employees' right of association and collective bargaining in compliance with applicable law.
- / you ensure that working and resting times are in line with applicable law.
- / you ensure that your employees receive a fair remuneration, which is at least equal to the minimum wage set out in the applicable law.
- / you respect the soil, forests and bodies of water that form the basis of existence for people.

# ENVIRONMENTAL MATTERS

As a business partner of TransnetBW

- / you commit to using natural resources in a responsible and efficient manner. You minimise, label and monitor all waste.
- / you are encouraged to ensure that your products and services result in lower emissions. You minimise the emission of pollutants into the air, water or soil.
- / you are aware of the environmental impact of your business activities. You ensure responsible environmental management and continuously work on reducing your environmental impact. Furthermore, you are expected to draw up and implement, or have already implemented, a specific environmental policy and comply with all applicable environmental law and regulations in the course of your business activities. You must ensure safe handling of chemicals or other substances that are considered hazardous in compliance with applicable law and regulations.
- / you commit to handle mercury and mercury compounds used in the production process and waste resulting from their use, appropriately and in accordance with the Minamata Convention.
- / you undertake to handle, collect, store, dispose of and export waste in an environmentally sound manner in accordance with international conventions (in particular in accordance with the POPs Convention and the Basel Convention).
- / you commit to use products containing conflict minerals responsibly and in accordance with the Conflict Minerals Regulation.
- / you avoid any type of environmental pollution that significantly affects the natural basis for food preservation and production (e.g. water pollution, soil degradation, air pollution).

# PRIVACY AND DATA PROTECTION

As a business partner of TransnetBW

- / you take all necessary and appropriate precautions, including confidentiality, in order to protect the information of TransnetBW and its business partners.
- / you adhere to all applicable information security requirements.
- / you comply with all relevant data protection law, in particular the EU General Data Protection Regulation (GDPR).

# REPORTING POTENTIAL BREACHES

Should you or your employees know or become aware of any breaches of the Business Partner Code of Conduct or should you or your employees know of any irregularities, in particular suspicions related to economic crime (e.g., fraud, anti-competitive agreements, corruption, money laundering), human rights violations, breaches of environmental regulations, or have concerns regarding security regulations, we ask you to report this information.

You may contact us or our independent, external ombudsman anonymously, if desired.

As a business partner of TransnetBW you must ensure that reporting persons are not discriminated against and that no disciplinary action is taken against them.

## / CONTACT DETAILS

### **TransnetBW Compliance Office**

Phone: +49 711 21858-3038

E-mail: [compliance@transnetbw.de](mailto:compliance@transnetbw.de)

### **TransnetBW Ombudsman**

Dr Harald W. Potinecke

CMS Hasche Sigle

Nymphenburger Strasse 12

80335 Munich, Germany

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