

TransnetBW

CODE OF CONDUCT FOR BUSINESS PARTNERS

Version 3.1

INTRODUCTION BY 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 and socially responsible manner. Sustainability is an integral part of our self-perception 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 and its 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 actively 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.

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. Oliver Strangfeld

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 subcontractors also meet the requirements set out herein.

This Code of Conduct is a binding element of any agreements and thus 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 otherwise 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, as a minimum, the principles set out hereinafter..
- / you ensure that your employees as well as your business partners know and adhere to the principles listed in this Code of Conduct. You will take reasonable measures to ensure that your suppliers and subcontractors also observe these principles.

INTEGRITY AND COMPLIANCE

As a business partner of TransnetBW

- / we expect you to conduct your business activities with integrity and in a highly ethical manner and to ensure fair competition. You know and comply with the relevant national and international anti-corruption and antitrust regulations and legislation.
- / 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 and all persons involved in the business activity are not the victims of harassment or abusive behaviour, regardless of whether these are of a verbal, psychological, physical, sexual or other nature. You also ensure that employees are not exposed to any form of forced labour or other work against their will, or to violence or duress.
- / you do not tolerate child labour, pursuant to the ILO Convention.
- / you ensure appropriate occupational health and safety standards in accordance with ISO 45001 or comparable systems 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 the right of employees to free association, to form unions and join them, to form an employee representative body such as a Workers' Council, and to actively engage in collective bargaining, in compliance with applicable law. Employees functioning as employee representatives must not be disadvantaged. If the right to freedom of association and collective bargaining is restricted under local law, you should facilitate the development of parallel means of independent and free association and collective bargaining, without impeding it.
- / you ensure that working hours of 48 hours per week are not exceeded. An extension to a maximum of 60 hours is admissible only if, on average, the 48-hour limit is not exceeded within a period of four calendar months or 16 weeks. Local and national legislation on working hours must be observed. You must ensure sufficient breaks and rest periods are provided in accordance with applicable laws.
- / you ensure that your employees receive a fair remuneration, which is at least equal to the minimum wage set out in the

applicable law. The conditions of collaboration, including working hours and wages, must be known to all employees, generally in the form of a written employment agreement. Wage deductions as a disciplinary measure are not admissible.

/ you respect the soil, forests and bodies of water that form the basis of existence for people.

ENERGY AND 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 management of all natural resources and continuously work on reducing your environmental impact.

Furthermore, you are expected to have in place a certified environmental management system for managing, measuring and reporting your environmental impacts, or to act in accordance with such a system. If the company does not have a certified environmental management system in place, as a minimum a person responsible for the implementation of environmental targets and programmes within the company must be appointed. As part of your business activities you will observe all applicable laws and regulations in the energy and environmental field.

/ you commit to ensuring the safe handling of chemicals and other substances that are considered hazardous in compliance with your binding obligations.

/ 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).
- / you rely on energy-efficient technologies and processes in order to ensure constant reductions in your energy consumption.
- / you make all efforts to switch to renewable energy sources and submit transparent documentation on greenhouse gas emissions as well as measures aimed at reducing them.

PRIVACY AND DATA PROTECTION

As a business partner of TransnetBW

- / you take all necessary and appropriate precautions, including the observance of 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 laws, 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 Code of Conduct for Business Partners 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

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TransnetBW Ombudsman

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