

# Human Rights Policy



# Contents

<b>Our Commitment</b> .....	<b>3</b>
<b>Implementation of the Commitment</b> .....	<b>3</b>
<b>Human Rights priority areas</b> .....	<b>4</b>
Health & Safety .....	4
Diversity, Equity & Inclusion .....	5
Governance, Ethics & Compliance .....	5



## Our Commitment

As a key player in the transmission of electricity at the heart of Europe, we seek to develop and operate our power grids for the benefit of society. In doing so, Elia Group is fully committed to upholding and promoting human and social rights as we undertake all of our activities, alongside complying with all applicable laws and regulations.

Our Commitment to human rights applies to Elia Group as a whole, including all of its subsidiaries. It comprises an acknowledgement of and support for the following international documents and treaties:

- the Universal Declaration of Human Rights of the United Nations
- the International Covenant on Civil and Political Rights
- the International Covenant on Economic, Social and Cultural Rights
- the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work

This policy document was drawn up following guidance published by the UN Global Compact, to which we are a signatory. We have incorporated the Ten Principles of the UN Global Compact firmly into our policies, procedures and corporate culture, upholding our basic responsibilities towards people and planet.

## Implementation of the Commitment

To emphasise the importance of human rights and make sure they form part of our corporate policy and culture, we have anchored our Commitment in our Elia Group Code of Ethics, which we expect all employees to follow. Furthermore, we have included concrete human rights priorities and ambitions in our Group-wide ActNow sustainability programme.

It is important for us to promote the protection of human rights through our relationships with suppliers, subcontractors and other stakeholders. In order to embed the principles of corporate responsibility and human rights across the supply chain, our commitment is also anchored in the Supplier Code of Conduct (SCoC). The SCoC sets out principles inspired by the most relevant international conventions and guidelines in the areas of ethical conduct, health and safety, and environmental and social aspects. We require our suppliers to comply with all the legal frameworks in our countries of incorporation and operation. Furthermore, we expect our suppliers to share our deep commitment to achieving a safe and healthy work environment and not tolerating any discrimination or inhuman treatment of any kind. We encourage our suppliers to support and become signatories of the UN Global Compact.



This Human Rights Policy is made available to internal and external stakeholders via our website and intranet. Our performance and impact on human rights is monitored and reported on our website and in our annual report. We continually assess our progress and incorporate all lessons learned into our actions. In particular, we seek to continuously improve our human rights due diligence process to avoid complicity in human rights abuses. We also encourage our employees, suppliers and stakeholders to speak up and raise any grievances or concerns they may have through existing channels, without retribution.

## Human Rights priority areas

Our ActNow programme defines our priorities and ambitions related to the field of sustainability in five dimensions, three of which are closely linked to our human rights Commitment:

- Health & Safety;
- Diversity, Equity & Inclusion;
- Governance, Ethics & Compliance.

The programme's sponsors include members of Elia Group's Executive Committee and it is managed by the Group Sustainability Office. Its ambitions are therefore fully embedded into our vision and mission, and into the processes which we use to define and execute our corporate strategy.

### Health & Safety

As a Group active in the transmission of electricity, our main activities involve work undertaken at height, work with electrical assets and maritime activities. Promoting health and safety is one of our essential social duties; it also strengthens our license to operate and contributes to our goal of reaching operational excellence.

This is why we have a long-established culture of safety. We have strict safety procedures in place, run regular training sessions for staff and promote safety through internal awareness campaigns. Moreover, we continuously enhance our technical and digital tools to reduce the risk of accidents. Our aim is zero accidents in the workplace – both for our own staff as well as our suppliers and subcontractors. Our ambition is clear: maintaining our solid safety record, even as our activities grow as part of our investment programme.

Besides avoiding accidents in the workplace, another of our priorities is ensuring the physical and mental wellbeing of our staff. Our workspaces are changing at a fast pace – we need to make sure that our employees stay



healthy, are able to cope with new working environments and are able to be resilient while facing the challenges that lie ahead. Ensuring this will lead to operational excellence - and ultimately to more efficiency.

This is why we have adopted a preventative approach to health and safety. Activities include the provision of a broad range of external medical services, including hotlines where employees can communicate their fears and problems anonymously; regular "pulse" checks; employee surveys; and the regular sharing of Group-wide best practice.

## Diversity, Equity & Inclusion

Diversity, equity and inclusion are key to making us more performant, resilient and attractive to the right talent for reaching our company goals. We are committed to working together in a way that values all employees and their abilities equally. We want to offer an inclusive and supportive work environment that provides equal opportunities for all and takes the communities and customers we serve into account. Therefore, in accordance with Convention 111 of the International Labour Organization (ILO), we are committed to promoting diversity and strongly condemn any discriminatory act at work. Accordingly, all employees are equal regardless of their sex, gender identity, country of origin, age, ethnicity, religion or belief, sexual orientation, ability, social background, union affiliation or other characteristics. Our professional interactions are based on respect and mutual appreciation and we encourage all employees to speak up and voice questions and concerns openly. We ensure that the design of our workplaces, our recruitment processes and our professional development programmes are designed in such a way that they are accessible to everyone, and we attach particular importance to maintaining trusting relationships and engaging in continuous co-operation with all employee representation groups in the company.

Our main ambitions are increasing diversity in terms of our employees' educational backgrounds, gender, employment histories and leadership experience.

## Governance, Ethics & Compliance

Good governance is essential for ensuring our sustainable success in the long term. Our Board of Directors provides effective oversight and we have strong internal controls in place alongside a solid approach to risk management. We carry out effective audits to ensure we comply with all relevant legal, regulatory and internal requirements while also preventing and avoiding fraud.

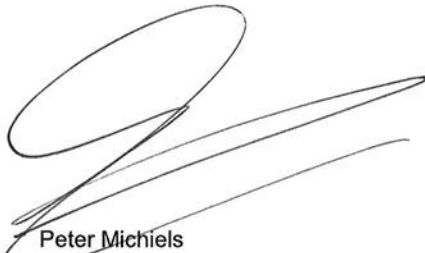
We have developed and published a Code of Ethics, which sets out guidance for staff across the Group, and have implemented dedicated policies to ensure integrity when carrying out our work with subcontractors and suppliers. We have also appointed people to act as confidential points of contact and provide anonymous reporting channels for staff to use with regard to anti-discrimination issues, anti-corruption measures and human rights violations.



We continue to prioritise transparency and early stakeholder engagement. This helps us to work in the best interests of society and develop powerful solutions with external partners and stakeholders. Being open and transparent and engaging in real dialogue with our stakeholders strengthens our license to operate and our roots in society; it also increases the impact of what we do while maximising the expertise of our partners and allows us to better shape solutions with them.

We apply a systematic participatory approach when carrying out grid development projects, regularly engaging with civil society and local citizens. Each time we plan an infrastructure project in a particular region, we disseminate and collect information and suggestions in order to establish the best possible routing and technical solutions.

Relatedly, Elia Group has started to adopt an integrated reporting approach as part of the publication of its annual reports. This constitutes a stakeholder-focused approach to corporate reporting that provides a complete picture of how each element of our value chain creates and erodes value over time.



Peter Michiels  
Chief Alignment Officer Elia Group

