

# SUPPLIER CODE OF CONDUCT

VERSION 2.0



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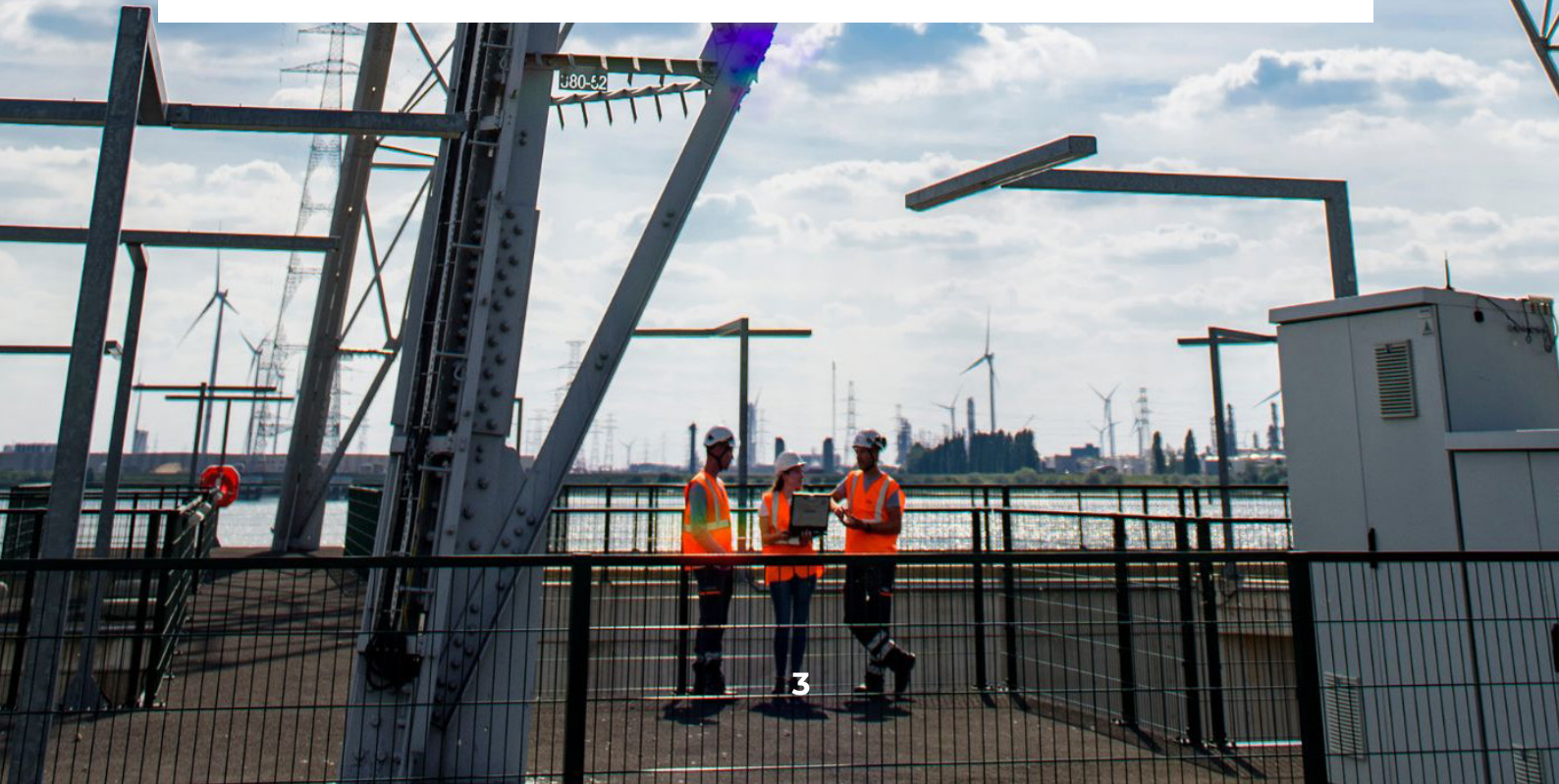


# INTRODUCTION

Elia Group is a key player in electricity transmission. We ensure that production and consumption are balanced around the clock, supplying 30 million end users with electricity. Through our subsidiaries in Belgium (Elia) and the north and east of Germany (50Hertz), we operate around 20,000 km of high-voltage connections, meaning that we are one of Europe's top 5 transmission system operators. With a reliability level of 99.99%, we provide society with a robust power grid, which is important for socioeconomic prosperity.

In addition to its activities as a transmission system operator, Elia Group provides consulting services to international customers through its subsidiary Elia Grid International. In recent years, the Group has launched new non-regulated activities such as re.alto – the first European marketplace for the exchange of energy data via standardised energy APIs – and WindGrid, a subsidiary which will continue to expand the Group's overseas activities, contributing to the development of offshore electricity grids in Europe and beyond.

We also aspire to be a catalyst for a successful energy transition, helping to establish a reliable, sustainable, and affordable energy system. We are achieving this by innovating new tools and processes and fortifying our relationships with all market players, with an emphasis on sustainability.



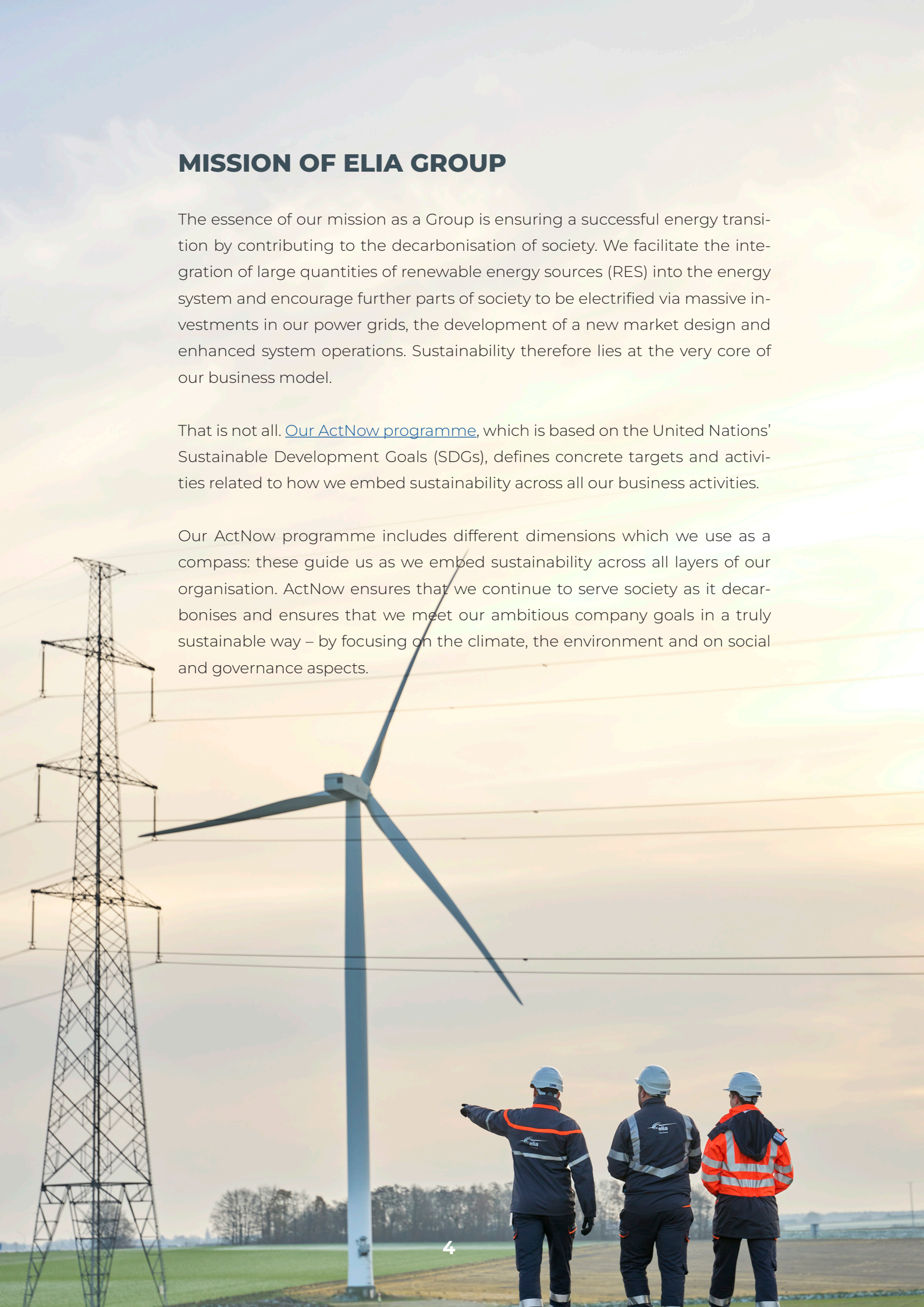


## MISSION OF ELIA GROUP

The essence of our mission as a Group is ensuring a successful energy transition by contributing to the decarbonisation of society. We facilitate the integration of large quantities of renewable energy sources (RES) into the energy system and encourage further parts of society to be electrified via massive investments in our power grids, the development of a new market design and enhanced system operations. Sustainability therefore lies at the very core of our business model.

That is not all. [Our ActNow programme](#), which is based on the United Nations' Sustainable Development Goals (SDGs), defines concrete targets and activities related to how we embed sustainability across all our business activities.

Our ActNow programme includes different dimensions which we use as a compass: these guide us as we embed sustainability across all layers of our organisation. ActNow ensures that we continue to serve society as it decarbonises and ensures that we meet our ambitious company goals in a truly sustainable way – by focusing on the climate, the environment and on social and governance aspects.





## A SUSTAINABLE SUPPLY CHAIN

Our suppliers are pivotal in enabling us to meet our stakeholder needs and ensuring our entire value chain is in line with our sustainable development vision. Our ambitions and core values also extend to our supply base. Suppliers are responsible to ensure that they and their employees as well as their sub-suppliers conduct business in a responsible manner. We also expect suppliers, encompassing goods and service providers and sub-suppliers, to adhere to applicable legal and regulatory requirements, and to respect international standards in relation to sustainability, human rights, labour conditions, the environment, health and safety and integrity.

We are looking for a collaborative approach with our suppliers to drive innovative and sustainable solutions that can deliver a positive impact in these matters.

This *Supplier Code of Conduct* sets the principles and requirements for responsible corporate governance and business integrity. It is based on:

- the UN Global Compact's Ten Principles<sup>1</sup>,
- the UN Guiding Principles on Business and Human Rights,
- the OECD guidelines<sup>2</sup>,
- the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz – "LkSG")<sup>3</sup>,
- the Directive (EU) 2022/2464 (Corporate Sustainability Reporting Directive)<sup>4</sup>, and includes requirements regarding fundamental international conventions and guidelines in the areas of ethical conduct, human rights, health and safety, environment, social responsibility, and business compliance & integrity.

It is Elia Group's objective to adhere to the principles set out in this *Supplier Code of Conduct* 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 suppliers and sub-suppliers 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 *Supplier Code of Conduct*.

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<sup>1</sup> The UN Global Compact's Ten Principles are derived from: the Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention Against Corruption

<sup>2</sup> [MNE Guidelines - Organisation for Economic Co-operation and Development](#) (oecd.org)

<sup>3</sup> [Supply Chain Act - CSR \(csr-in-deutschland.de\)](#)

<sup>4</sup> [Directive - 2022/2464 - EN - CSRD Directive - EUR-Lex \(europa.eu\)](#)



# SCOPE

This *Supplier Code of Conduct* is binding for all suppliers of Elia Group companies<sup>1</sup>. (Elia Group companies are hereinafter altogether referred to as “Elia Group”).

Sub-suppliers commissioned by these suppliers in connection with the business relationship with Elia Group, regardless of the type of collaboration, are also bound by this Supplier Code of Conduct. We expect our suppliers to take reasonable measures to ensure that their suppliers and sub suppliers also meet the requirements set out herein.

This *Code of Conduct* is an integral part of the business relationship between the supplier and Elia Group.

<sup>1</sup> Please find more on the Elia Group structure here: [Legal Structure \(elia.be\)](https://www.elia.be/en/legal-structure)



# PRINCIPLES

## GENERAL PRINCIPLES

As a supplier of Elia Group: 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 suppliers and sub-suppliers know and adhere to the principles listed in this *Code of Conduct*.

## HEALTH & SAFETY

At Elia Group, safety is not just a priority, but a fundamental value embedded in our organizational DNA. We are committed to adhering to the most stringent safety standards, not only for our employees but also for our suppliers and anyone interacting with our infrastructure. Our ambition is to ensure every individual associated with Elia Group returns home safe and sound every day, fostering their overall health and wellbeing.

We therefore expect you to commit to the safety and security rules and instructions of Elia Group. This means inter alia that:

- You shall implement and maintain measures to adequately identify and manage health, safety and security risks associated with your operations for Elia Group, including the reporting of incidents, near misses and hazardous situations. Given the importance of safety, Elia Group may – according to contractual agreements – take measures if you are not appropriately dealing with a (potentially) dangerous situation.
- You shall provide adequate and regular training to ensure that employees are educated on health and safety issues.
- You shall encourage and reinforce sound health, safety, and security practices throughout your supply chain to keep the number of accidents as low as possible.

We recommend the implementation of a system for managing, measuring, and reporting on health & safety impacts, such as, but not limited to, SCC (VCA), BeSaCC, or ISO 45001.



## HUMAN RIGHTS

Elia Group advocates the principles of diversity, equality, human dignity, and fundamental rights in all professional and business interactions. You are expected to acknowledge and uphold the UN Guiding Principles on Business and Human Rights<sup>1</sup>, as well the standards of Directive (EU) 2022/2464 (Corporate Sustainability Reporting Directive) ensuring both you and your sub-suppliers abstain from any involvement in human rights violations. In line with principles 1 – 6 of the UN Global Compact<sup>2</sup> and our Human Rights Policy<sup>3</sup>, you shall particularly observe the following principles and apply these in your supply chain. This includes, but is not limited to:

- 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<sup>4</sup>.
- You take appropriate measures against any type of discrimination and unequal treatment. Every employee is treated with respect and dignity. 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 rights of association and collective bargaining of all workers in your value chain in compliance with the applicable law.
- You ensure that working and resting times are in line with the applicable law.
- You ensure that all workers in your value chain receive a fair remuneration, which is at least equal to the minimum wage set out in the applicable law and we expect attention to equal pay of all genders.

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1 The Ten Principles of the Global Compact: for more information, see <https://www.unglobalcompact.org/What-is-gc/mission/principles> (English)

2 Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights.

Principle 2: make sure that they are not complicit in human rights abuses.

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

Principle 4: the elimination of all forms of forced and compulsory labour.

Principle 5: the effective abolition of child labour; and

Principle 6: the elimination of discrimination in respect of employment and occupation

3 [Governance and Reporting \(elia.be\)](#)

4 ILO 138

## ENVIRONMENTAL MATTERS

In accordance with principles 7-9 of the UN Global Compact<sup>1</sup>, and of Directive (EU) 2022/2464 (Corporate Sustainability Reporting Directive) we encourage you to align your sustainability goals with Elia Group's corporate objectives regarding environmental impact.

This includes, but is not limited to:

- Minimizing waste and emissions to land, water, and air resulting from business activities.
- Preventing and managing any potential impact on biodiversity and natural habitats from their operations.
- Utilizing resources, energy, and recycling models efficiently.
- Safely handling hazardous goods or chemicals.
- Applying efficient technologies and processes to lessen environmental impact as much as possible.

You are expected to strictly adhere to all relevant laws and regulations pertaining to environmental and social protection, as well as site-specific regulations. We recommend the implementation of a system for managing, measuring, and reporting on environmental impacts, such as, but not limited to, ISO 14001 or equivalent.

**1 Principle 7: Businesses should support a precautionary approach to environmental challenges, Principle 8: undertake initiatives to promote greater environmental responsibility; and Principle 9: encourage the development and diffusion of environmentally friendly technologies.**



# ETHICS AND COMPLIANCE

## Legal Requirements

In line with Principle 10 of the UN Global Compact<sup>1</sup>, we require our suppliers to comply with any legal framework in force in the countries of incorporation and operation with respect to:

- bribery and corruption/facilitation payments (providing benefits to Employees or public officials to (attempt) to influence business decisions): Third parties working for or on behalf of Elia Group must abide by all applicable Anti-Bribery and Corruption (“ABC”) laws in every country in which they do business for or on behalf of Elia Group (e.g. European, federal, regional, provincial, and state laws and directives). Anti-bribery and corruption are to be interpreted according to directives and principles such as the Foreign Corrupt Practices Act, UK Bribery Act, as well as all other applicable legislation (the Belgian and German ‘Criminal Code...’) and global standards.
- fraud (e.g. misleading financial reporting),
- unfair competition (cartels, price-fixing, abuse of dominance, exchanging company specific confidential commercially sensitive information that distorts or could distort competition),
- extortion, or
- money laundering

## Conflict of interests

To avoid any risk of influencing the procedure or discriminating against suppliers, all parties involved in the procurement procedure rule out any unethical or compromising behaviour or activity vis-à-vis suppliers or any actions that may suggest it. We are expecting the same behaviour from potential and existing suppliers.

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<sup>1</sup> Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

## Confidentiality, Data Privacy, and Intellectual Property

You are required to take all necessary and reasonable measures to protect and secure Elia Group's confidential information, know-how, technical data, and intellectual property. Any information provided by Elia Group must only be used by the supplier for the agreed or intended purpose. Unless otherwise contractually agreed or provided for by law, such information shall only be shared with third parties if, and to the extent that it is essential for the proper execution of any task approved by Elia Group.

You must adhere to all relevant data protection laws, specifically the EU General Data Protection Regulation, as well as any applicable additional national data protection laws when provided with personal data during their business relationship with Elia Group.





# COMPLIANCE MONITORING ACTIVITIES

As Elia Group supplier you shall have suitable compliance and control mechanisms in place, be aware of potential operational, environmental, safety or legal risks affecting your corporate status, and know how to appropriately manage them. You shall ensure safety, human rights and environmental risks and incidents, potentially severely impacting Elia Group's reputation or supply chain are promptly reported.

Also, you shall provide adequate and regular training to ensure that employees are educated on human rights, health and safety, ethics, and environmental issues.

Elia Group retains the right to carry out monitoring activities to effectively assess your compliance with this *Supplier Code of Conduct*. This may include, but is not limited to,

- completion and submission of self-assessment questionnaires to Elia Group or a third party appointed by Elia Group for supplier assessment.
- on-site audits: Elia Group companies and their authorized external or internal auditors have the right to perform audits. These audits may involve on-site inspections of offices and/or production facilities, interviews with selected employees at your premises, construction sites, and other places where work is done on your behalf. The audit will be limited to documents related to the business relationship with Elia Group companies.
- existing CSR reports or audits and assessments carried out by supplier can be used as proof of compliance with the *Supplier Code of Conduct*. If deemed necessary, supplier should provide additional information to Elia Group upon request.

You shall promptly report any potential or actual breaches of the *Supplier Code of Conduct* to Elia Group. This includes any illegal or criminal activities (e.g., fraud, anti-competitive agreements, corruption, money laundering), human rights violations, environmental regulation breaches, or security con-

cerns that could impact Elia Group's business or reputation.

Elia Group encourages you and your employees to report your concerns via [Elia Group's Ethics Alerting reporting portal](#).

Non-compliance with the *Supplier Code of Conduct* may entail terminating the business relationship with you, depending on the gravity of the violation and on specific circumstances. In case of reparable non-compliance, Elia Group reserves the right to engage you and assist in establishing an improvement action plan with clear deadlines, the fulfilment of which will help you to keep the business relationship intact.





# VALIDITY

This version of the *Supplier Code of Conduct* comes into force on 1 January 2025 and replaces the Elia Supplier Code of Conduct of August 2018 and the 50Hertz Supplier Code of Conduct (Verhaltenskodex für Lieferanten) of May 2019.

The most recent version of the *Supplier Code of Conduct* shall apply. Elia Group reserves the right to update, replace, or modify this *Supplier Code of Conduct* at any time. Supplier is expected to accept any modification resulting from legal requirements or which may otherwise be reasonably required.

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By signing this document, you confirm that you endorse the aforementioned Elia Group Supplier Code of Conduct.

**Elia Group is a key player in electricity transmission. We ensure that production and consumption are balanced around the clock, supplying 30 million end users with electricity. Through our subsidiaries in Belgium (Elia) and the north and east of Germany (50Hertz), we operate 19,460.5 km of high-voltage connections, meaning that we are one of Europe's top 5 transmission system operators.**

**With a reliability level of 99.99%, we provide society with a robust power grid, which is important for socioeconomic prosperity. We also aspire to be a catalyst for a successful energy transition, helping to establish a reliable, sustainable and affordable energy system.**

**Elia Group is a listed company whose core shareholder is the municipal holding company Publi-T.**

**EDITOR**

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