

# Our conduct towards one another



Everyone's sustainable energy – that's our mission. We can realise this mission if we interact with customers, each other and our partners in the right way. Our Eneco Code of Conduct helps us to do this and sets out the rules that apply to all of Eneco's relationships.





## Foreword on behalf of the Management Board

Eneco is a strong, sustainable international energy company with a powerful mission: sustainable energy for everyone! We want our planet to stay liveable and that is why we will accelerate the energy transition together.

This is a major challenge for us all as the competition is huge and developments take place at lightning speed. Only with the right focus on new products and services, on digitisation and on growth in sustainable energy sources can we attract customers to our mission and hold on to them.

The way we interact with our customers, each other and our partners is crucial in this connection; it is these high standards of conduct that set Eneco apart! Our cultural values guide us: drive the energy transition, deliver results and make each other successful!

This Code of Conduct describes the rules that apply to all Eneco's relationships. Our relationship with the customer, with our external relations and our relationship with you as a colleague in one of our countries the Netherlands, Germany, Belgium or the United Kingdom.

All Eneco employees are expected to know and comply with our Code of Conduct. You should see the Code as an incentive to put integrity and decency first in everything you do. Stand up for who you are, dare to be critical and don't be afraid to talk to each other about behaviour. This will enable us to realise our mission together!

# Contents

Foreword on behalf of the Management Board	2
Summary	4
Who are we?	5
Our cultural values	5
Applying and complying with the Code	6
Dialogue, report and speak up!	7

<b>1. Our relationship with our customers</b>	<b>8</b>
1.1 Customer-focused communication	9
1.2 Customer privacy	9
1.3 Customer recruitment	10
1.4 Building in the vicinity of customers	10

<b>2. Our relationship with society</b>	<b>11</b>
2.1 Sustainable business	12
2.2 Corporate Social Responsibility	13
2.3 Doing business with integrity	13

<b>3. Our relationship with our shareholders</b>	<b>15</b>
3.1 Corporate Governance	16

<b>4. Our relationship with our employees</b>	<b>17</b>
4.1 Our ethics as an employer	18
4.2 Health	18
4.3 Safety	18
4.4 Diversity and inclusivity	19
4.5 Discrimination	19
4.6 Development and remuneration	20
4.7 Employee privacy	20

<b>5. Our employees' relationship with Eneco</b>	<b>21</b>
5.1 Employee ethics	22
5.2 Ancillary activities	22
5.3 Private investments	22
5.4 Working from home	23
5.5 Handling company information	23
5.6 Fraud and theft	24
5.7 Intellectual property	24
5.8 External communication	24
5.9 Retrieving and changing customer data	24
5.10 Using company equipment	25
5.11 Substance intake	25

<b>6. Relationships between employees</b>	<b>26</b>
6.1 Mutual cooperation	27
6.2 Feedback	27
6.3 Discrimination	27
6.4 Sexual intimidation	27
6.5 Bullying	28
6.6 Aggression or threatening behaviour	28
6.7 Abuse of power	28
6.8 Personal relationships at the workplace	28

<b>7. Cooperating with external relations</b>	<b>29</b>
7.1 Integrity from and towards business partners	30
7.2 New business partner	30
7.3 Selection of suppliers	30
7.4 Business conflict of interest	30
7.5 Conflict of interests relating to gifts and entertainment	31
7.6 Contacts with government agencies	31
7.7 Sponsorship of events or external relations	32

Index	33
-------	----

# Summary

## Introduction

We can only fulfill our leading position in the energy transition, if we respect the highest Codes of Conduct. This Code of Conduct describes the rules that apply to all Eneco's relationships.

## Cultural values

Our three cultural values help to accelerate the energy transition together: drive the energy transition, deliver results and make each other successful! These values connect and strengthen us. They guide our behaviour. How we address issues as one team, one Eneco and how we interact with each other.

## Application

All Eneco employees are expected to know and comply with our Code of Conduct.

The Code of Conduct applies to all employees of Eneco as well as to divisions that Eneco owns by more than 50%. This means that the Code applies to the four core countries in which Eneco operates - the Netherlands, Germany, Belgium and the United Kingdom - and to our brands such as LichtBlick SE, Agro Energy, Eneco eMobility and Oxxio. If there is a conflict between the Code of Conduct and local legislation, then the local legislation will prevail. If this occurs, please contact the local Compliance Officer.

## Dialogue, report and speak up

If you have questions about the Code or if you are struggling with a dilemma, always consult your manager, HR or your local compliance contact person. If you are aware of a potential or actual violation of the Code of Conduct, or in the case of socially undesirable behaviour, such as bullying, discrimination or sexual intimidation, please report or discuss this on a confidential base via the designated integrity reporting lines or confidential advisers (see 'Dialogue, report and speak up!' on page 7).

### 1. Our relationship with our customers

In everything we do, we immerse ourselves in our customers. Not just in their world, but above all in their hearts and minds. This allows us to shape our daily work in their interests. We say what we do, and do what we say! Customers choose us on the basis of their own convictions. And we do everything to protect our customers' personal data.

### 2. Our relationship to society

We are driven by a crystal clear mission: everyone's sustainable energy. Working from this mission, sustainability, environment, safety, integrity and corporate social responsibility provide the basis for our interactions in society. We always obey the law and regulations in every

country, and have zero tolerance for corruption.

### 3. Our relationship with our shareholders

Eneco is committed to its shareholders, Mitsubishi Corporation en Chubu Electric Power Inc., Co. They fully endorse Eneco's sustainability strategy and their support puts us in an excellent position to continue playing a leading role in the energy transition.

### 4. Our relationship with our employees

Eneco aims to have an excellent relationship with its employees. Our focus includes a safe working environment, a good work-life balance and employee health and development. We aim to have a workforce that reflects society and consider it extremely important that we respect everyone's differences and capacities, and that we bring out the best in our people.

### 5. Our employees' relationship with Eneco

As a good employee, you are always loyal to Eneco. You are an ambassador in your communications about Eneco and you take good care of our property. You set a good example and you monitor your own integrity continuously, keeping Eneco's and your own personal interests separate.

### 6. Relationships between employees

Our employees focus on cooperation. Team interests come before personal interests. Cooperation also means that you stick to agreements and that you are committed to each other. Be receptive to advice or criticism, and don't be afraid to give these either. And - speak to each other, not about each other. Also treat each other with respect: any form of sexual intimidation, bullying, discrimination, threatening behaviour or aggression towards each other is unacceptable.

### 7. Our relationship with our business clients

We like to work with ethical business partners that feel responsible for good social and sustainable performance. We therefore check carefully who we do business with and where. We never make deals that would restrict open market competition.

Gifts and entertainment may never influence the transparency of our business decisions. The criterion is that gifts and invitations for entertainment should always be 'appropriate and reasonable'. Other stakeholders are also important to us. We work to maintain an open, personal relationship with them.

## Who are we?

### Eneco

Eneco is an integrated and independent energy company. With 4.000 people, we serve around 6 million customer contracts in various countries. We are ranked among the top energy companies in the Netherlands, Belgium and Germany. We are also active in the United Kingdom.

Eneco's shareholders are Mitsubishi Corporation (80%) and Chubu Electric Power Inc., Co. (20%). Their support allows Eneco to continue to grow, nationally and internationally.

### Accelerating the energy transition

Eneco wants to accelerate the energy transition. By helping our customers with smart, affordable and sustainable energy solutions that enable the customer to become more sustainable, in the way that suits them best. And the customer is in control of his or her energy supply. In this way sustainable energy really belongs to everyone.



## Our cultural values

Our three cultural values guide us how we do our work and how we interact with customers, each other and with other business clients.

### Drive the energy transition

Today, we are taking the necessary steps to realize our One Planet Plan. We do this by working together towards shared goals. This value demonstrates our determination to fulfill our mission through innovative and smart work. We prioritize the customer in executing our tasks.

### Deliver results

We create value by prioritizing deliverables that have the greatest impact. This value is about actually delivering results. We all know how we contribute to the collective result, taking our own responsibility according to clear roles and responsibilities.

### Make each other successful

We work closely together and help each other grow in an inclusive and positive work environment. This value is about creating and celebrating successes together. We contribute to this value by being open and transparent, discussing different perspectives, and sharing constructive feedback.

# Applying and complying with the Code

## Applying the Code of Conduct

The Code of Conduct applies to all employees in all countries in which we operate, as well as to the divisions that Eneco owns by more than 50%.

## Underlying guidelines

If the Code of Conduct refers to an underlying guideline, it may be the case that this guideline does not apply to a certain division or country. If so, this will be stated in the guideline itself.

## To whom does the Code of Conduct apply?

The Code of Conduct applies to internal employees working under an internship or employment contract as well as external employees working under a secondment, temporary employment or freelance contract, for example.

The Code of Conduct does not apply in full to self-employed individuals ('ZZP-ers') working in the Netherlands. The relevant and applicable sections are documented in a separate statement: 'Verklaring Bewustzijn Geheimhouding, Intellectueel Eigendom en Gedragscode'.

## Purpose of the Code of Conduct

The purpose of this Code of Conduct is to support our employees in their understanding and application of the various rules, ethical standards and values within Eneco. The Code is a reference tool and helps everyone do the right thing.

## Structure

The Code of Conduct is organised around the concept of 'Relationships'.

## Everyone must act in accordance with the Code

Everyone must uphold the rules, standards and values set out in the Code of Conduct. Furthermore, our employees must act not only observe the letter but also the spirit of the Code at all times.

If there is a conflict between the Code of Conduct and local legislation, then the local legislation will prevail. If this occurs, please contact the local Compliance Officer.

If you do not comply with the Code, this can have serious consequences for Eneco. Non-compliance can lead to disciplinary measures or even dismissal, depending on the nature and seriousness of the infringement.

## What do we expect from you as manager?

Managers serve as an important example to employees. That is why we expect managers to take the lead in compliance with this Code of Conduct, conveying our cultural values, and actively creating a culture of cooperation and trust in which it is normal to act with propriety and in which people are not afraid to broach issues.



# Dialogue, report and speak up!

## Do you have a compliance question or dilemma or do you want to report on compliance?

We define compliance as acting in accordance with applicable laws and regulations. You can always consult an in-house lawyer of the legal department, member of the Regulatory Affairs team or your Compliance Officer. For privacy issues there is a separate privacy contact person and reporting line in each country.

## Do you have an integrity question or want to report on integrity?

Integrity is about appropriate behaviour in line with values and norms of the organisation and society. Topics are fraud, theft, bribery and corruption and undesirable behaviour. Ethical dilemmas are also part of integrity. Our starting point is an open and transparent culture in which things can easily be discussed. If you have any questions about our Code of Conduct or if you have a dilemma, try discussing this in the first place with your colleagues or by talking to your manager or contacting HR.

You can also contact an independent professional to discuss integrity dilemmas. In case you are aware of a (possible) breach of the Code of Conduct, including inappropriate behaviour, always contact one of the designated local reporting lines and/or confidential advisers.

## Where can I find the reporting channels to seek advice or report breaches?

In each country there are different options to seek advice or report, depending on the nature of the issue and depending on the part of the organisation in which you work.

All internal contact details can be found on our [Intranet](#).

Third parties can get in contact via the email address: [fm\\_speakup@eneco.com](mailto:fm_speakup@eneco.com), after which adequate follow-up will be given by designated responsible persons within Eneco.

## Anonymous reporting and protection

Depending on the situation you can choose to make an anonymous report. Each report will be processed in accordance with the Compliance and Integrity Reporting Policy. Eneco will always protect the rights of all parties involved. This [Policy](#) is available on the Intranet.



# 1. Our relationship with our customers

To our customers, we are a reliable supplier of energy and energy-related products and services. Customers come first at Eneco and they can expect an excellent service from us. In this section we explain the basic principles that apply to employees in our relationship with our customers.



## Customer-focused communication

Our customers' interests are paramount. In everything we do, we immerse ourselves in our customers. Not just in their world, but above all in their hearts and minds as well. We help the customer to become more sustainable in a way that suits the client best. And to be in control of the own energy supply. That is our promise to the customer: you're in charge. All of Eneco's internal activities and processes must ultimately focus on an excellent customer experience: effortlessly and digital first.

This means that we approach them in a friendly, professional and efficient way. We are upfront in our communications with customers. We make it clear what customers can expect from us and paint an accurate picture of our products and services. And we never promise anything we cannot deliver.

**We put the customer first. We say what we do, and do what we say!**

### What does this mean for you?

Customers are our lifeblood, which is why we put our customers first in our work, every day. Always act courteously towards our customers and make sure you come across in a friendly way.

We never behave aggressively towards existing or potential customers. Even if this customer is not acting with propriety or is even aggressive. If the customer acts in an aggressive, threatening or persistently inappropriate way, such as shouting and cursing etc., you do not have to tolerate this and you can simply end the discussion in an appropriate way.



## Customer privacy

We use our customer data carefully and conduct our business in compliance with privacy legislation. The way in which we process customer data is described in our Privacy Statements. These can be found on our websites.

We have also established internal rules and Codes of Conduct on how we process customers' personal data. A Data Protection Officer has also been appointed as internal privacy regulator.

We check before approaching any potential new customers, in case we are prohibited from contacting them, or they do not wish to be approached. It can happen that we outsource the processing of customer data to a third party. We draw up a processing agreement for this purpose.

We may occasionally record telephone conversations with customers. Our customers will be informed of this in advance.

Eneco has established Data Breach reporting lines in each country in which it operates, where customers can notify us of any personal data breaches.

**Protecting our customers' personal data is a priority for us.**

### What does this mean for you?

Be vigilant when using customer data. Customers need to have confidence in us to manage their personal data properly and never to randomly share it with third parties.

You can find more details on this in the Privacy Policy on the [Intranet](#).

## Customer recruitment

We always adhere to strict legal requirements in recruiting customers. We will, therefore, never recruit customers based on inaccurate, misleading or aggressive sales techniques. We always ensure that the information we provide is correct and complete.

We are proud of our company and our products! As an employee, you may of course use your powers of persuasion to convince a customer to choose Eneco. But please respect the boundaries. The starting point is that customers pay a fair price at Eneco and always have the freedom to decide whether they want to become a customer.

Customers must always choose us of their own free will.

### What does this mean for you?

Use reliable information to convince potential customers and clarify how we add value. If the first contact with a customer is genuine, this can lead to a long-term relationship.

## Building in the vicinity of customers

Eneco aims to have good relationships with the people who live, work or enjoy leisure activities in the neighbourhoods in which we are active. We are aware that our installations impact those around us and we aim to be a good neighbour.

That is why we involve the neighbourhood at an early stage during the development, construction and management of our energy projects. We start a dialogue with stakeholders and take their wishes and concerns into account. We discuss how the neighbourhood wants and can be involved and identify the bottlenecks or points for improvement. We are also aware that stakeholders can sometimes be or become customers.

We also discuss who would want to participate in the project. For example, as a customer purchasing energy from that specific project or participating financially as an investor.

For assets or activities that impact local residents, we engage in transparent dialogue and build on sustainable relationships.

### What does this mean for you?

We have articulated our environmental management in a community policy. Ensure that this policy is followed in any projects that impact the neighbourhood.



## 2. Our relationship with society

Energy has a big impact on people and the environment. We meet a fundamental need of society. Sustainability, environment, safety, transparency, acting with integrity, respecting the interests of local residents and human rights are important starting points. This chapter describes how we see our role in relation to society.



## Sustainable business

Eneco and society as a whole are building towards a new era in energy. We only have one planet, and at the moment we are overusing energy and are exhausting our natural resources on a global scale.

Fortunately, the support base for stopping global warming is growing.

Eneco is also very much aware of the real urgency of the energy transition and aims to play a leading role in this.

### Ambition

Eneco aims to bring energy consumption within the boundaries of our planet's capacity. In doing so, we contribute to a healthy planet, not just for ourselves, but also for future generations.

One Planet is our ambition! That is why we support the Paris climate agreements to keep global warming well below 2°C, with an aim for 1.5°C. See our website for more information about: [What we do with our One Planet Plan.](#)

One Planet is our ambition!

### Vision

We are convinced that everyone can take control of energy and sustainability. The energy transition is all about the shift from a centrally organised energy system to a system in which we all organise our own energy sustainably. At street or district level, together with our neighbours, for instance.

The major market trends that we are taking into account in the coming years can be summarised under 3Ds: 'Decarbonisation, Decentralised and Digital'.

### Mission

Our specific tasks in relation to the energy transition are innovation and acceleration. And to make our relationship with our customers stronger. Our responsibility goes far beyond merely producing and supplying green energy. We offer added value to our customers by providing energy products and services so they can get to grips with energy themselves, enabling smarter living and working.

That starts by putting people first in their day-to-day activities. We want to know what is going on in their hearts and minds. When we know what they really want, what motivates and moves them, we can respond more effectively.

Our mission is: everyone's sustainable energy.



## Corporate Social Responsibility

Corporate Social Responsibility (CSR) means that we take account of the social impact of all our activities. Openness about our impact on people, the environment and society is important to us. We consider the impact of our new products and projects, even if this impact takes place further on in the chain. We work to reduce any negative consequences of our actions within our sphere of influence.

### Sustainable Procurement

Eneco prefers to do business with suppliers who have the same passion for sustainability and safety. Sustainable Procurement shifts the accents in the standard procurement process, with a focus on social and ecological criteria in selecting suppliers.

From our One Planet ambition, sustainability, environment, safety, integrity and corporate social responsibility form the basis for our interactions in society.

### Internationally recognised human rights treaties and Corporate Social Responsibility guidelines

We endorse internationally-recognised treaties and guidelines including:

- The Universal Declaration of Human Rights
- The OECD guidelines
- The tripartite ILO Declaration on Fundamental Principles and Rights at Work
- The ISO 20400 and 26000 guidelines with respect to embedding CSR within an organisation
- The recommendations from the Task Force on Climate-related Financial Disclosures

Moreover, we are a member of Global Compact, an important network of companies and stakeholders that support the ten Universal Principles as promoted by the United Nations.

Eneco respects international treaties and guidelines. We also respect the cultures and customs of all countries in which we operate as long as these do not conflict with our own norms and values.

## Doing business with integrity

Fair and honest business practices are a priority for Eneco. We adhere to all applicable national and international legislation and regulations.

### Corruption

We want no involvement in any kind of corrupt practices. Corruption takes various forms, including bribery or kick-back payments. Bribery often involves hidden payments to enable transactions or dealings, such as closing a deal, and can take the form of cash bribes. Kick-back payments are a form of cash bribe paid to influential individuals in an organisation in exchange for a type of illegal benefit.

Sometimes a distinction is made between payments to facilitate something that the recipient is supposed to do (so-called 'facilitating payments') and payments to facilitate something that ought not to be done. Both cases are not permitted.

### Doing business in corrupt countries

If we do business in another country, we first investigate whether we can trust the business practices in that country. We do not do business in countries that score high on the Corruption Perceptions Index, which is published annually by Transparency International.

If a locally permitted custom or method of operating is needed in a certain country to achieve our goal there, while this is not permitted according to our own standards, we do not conduct this activity.

We want no involvement in any kind of corrupt practices and we do not do business in corrupt countries either.

Check the [Anti-Bribery & Corruption Policy](#) for more information.

## Sanctions

Sanctions are international political measures against a country, organisation or person. Sanctions are used in response to violations of international law or human rights. Sanctioned countries, companies or persons are included in so-called sanctions lists.

The two most important sanctions lists are those of the [United Nations](#) and the [European Union](#).

Always check these lists before starting or doing international business. A due diligence investigation may also be required. Please consult the compliance contact regarding this.

## PEP lists

There are also PEP lists in addition to the sanctions lists. PEP stands for 'Politically Exposed Persons'. This includes persons who fulfil or have fulfilled important public functions. Based on their position of influence, these persons are assumed to be at a higher risk of money laundering practices and corruption. If potential customers or business partners appear on the 'PEP' lists a due diligence investigation is mandatory. Please contact the compliance contact for this.

We are aware of the risk of acting in contravention of international sanctions legislation. We therefore check carefully who we do business with and where.

## Trade legislation and export controls

We always adhere to national and international trade legislation, which includes regulations regarding the import, export and domestic trade of goods.

The so-called 'export controls' form part of this. This concerns measures that governments introduce to restrict the distribution of certain goods or services. This usually relates to national and international security.

Eneco is not likely to be subject to a permit obligation based on export controls, but please contact the compliance contact person if you have any concerns about this.

## Money laundering and terrorism

We do not tolerate any form of money laundering and financing of terrorism. Money laundering refers to any activity whereby the proceeds of crime are masked or concealed by legitimate business transactions. Conversely, legitimate funds can be used to finance criminal activities, including terrorism.

## Competition

We support open and fair competition within our market sectors. Our relationship with the European energy market is growing. Eneco always complies with Competition Law Regulations. We do not make any deals that would restrict open market competition, including agreements with competitors about market sharing, prices or rates.

Nor do we share sensitive commercial information with competitors and if we have an economic advantage, we do not abuse it.

You can attend an external meeting at which competitors are present, such as a sector association or a training course. However, please be aware that as soon as a topic concerns sensitive commercial information, you should object to this openly and ensure that this appears in the minutes. You should then leave the meeting and contact the Compliance Officer.

We never make arrangements that would restrict open market competition.

## What does this mean for you?

Eneco always wants to do business with integrity. We do not want to disregard the law in any way or be portrayed in a bad light.

Be careful with whom you do business. Be very aware of the legal risks and always work in a transparent way. Consult your colleagues, manager or if necessary the compliance contact. They can help you make the right assessment or in carrying out due diligence.

Check the [Fair Competition Policy](#) for more information.

# 3. Our relationship with our shareholders

Eneco's shares are held by a consortium of two shareholders, Mitsubishi Corporation and Chubu Electric Power Inc., Co. In this section, we describe our commitment to our shareholders and explain Eneco's governance.



## Corporate Governance

### Our shareholders

Eneco is an integrated and independent Dutch energy company, in which 100% of the shares are held by a consortium. This consortium comprises Mitsubishi Corporation (80%) and Chubu Electric Power Inc., Co. (20%).

Our new shareholders fully endorse Eneco's sustainable strategy. Their support puts us in an excellent position to continue playing a leading role in the energy transition. They enable us to focus our sustainable strategy on the growth of renewable energy sources, energy supply, to accelerate the implementation of innovative services and to expand both nationally and internationally.

### Our governance model

The Eneco governance model is based on a so-called 'structure regime' with a 'two-tier board'. The Board of Directors manages the daily operations of the holding and has ultimate responsibility for Eneco performance. The Eneco Board of Directors is made up of six members. The Board of Directors is appointed by the Supervisory Board and is accountable to the Supervisory Board and the General Shareholders' Meeting.

The Eneco Supervisory Board advises the Board of Directors, operates independently and exercises full supervision of the policy of the Board of Directors as well as the general course of affairs in Eneco and its associated firms. The Eneco Supervisory Board has established two committees, a remuneration/selection and appointment committee and an audit committee.

The remuneration/selection and appointment committee selects and appoints the members of the Board of Directors and the Supervisory Board, and makes recommendations regarding their remuneration. The audit committee monitors important financial affairs. This committee meets about this each quarter and has a meeting with the external auditor at least twice a year. The Supervisory Board presents the annual accounts to the General Shareholders' Meeting for adoption.

The Supervisory Board is appointed by the General Shareholders' Meeting. The annual report is discussed and the annual accounts are adopted at the annual General Shareholders' Meeting.

Eneco is committed to its shareholders and has designed its governance in accordance with a two-tier board structure.



## 4. Our relationship with our employees

We aim to provide our employees with an ethical, stimulating and safe working environment. To attain this, we draw up and comply with sound management policies that serve as a guiding principle from Eneco. This section sets out those policies.



## Our ethics as an employer

As a good employer we respect the interests, wishes, ambitions and capacities of our employees. We also strive to ensure a good work-life balance, which stresses the importance of the quality of the employee's work, on the one hand, and the growth and development opportunities for the employee, on the other.

### What does this mean for you?

You can expect that Eneco really takes your interests into account. It should be clear what is expected of you and you are expected to be familiar with the policy. New employees are briefed on this during an induction programme.

Your manager can answer any questions on this.

Eneco aims to have an excellent relationship with its employees. A good work-life balance is a part of this. By clearly setting out and fulfilling agreements, everyone has certainty about their role.

## Health

Our mental and physical health is vital. Our ongoing aim is to promote the health of our employees and to create a working environment that is physically and socially safe. Our health policy is designed to support an active, energetic and committed workforce. Eneco also offers various forms of professional support.

### What does this mean for you?

As employee you also have a certain responsibility. Take care of your own mental health and wellbeing and if your mental wellbeing is influencing your performance, you can discuss this with your manager. Support your colleagues and know where you can refer them if you think they need help.

This also applies to colleagues with physical health complaints.

We encourage our employees to be healthy and to continue to lead efforts to promote their health.

## Safety

Safety comes first at Eneco. Our activities may never endanger the safety and wellbeing of customers, the environment and employees. Together we ensure that everyone is aware of the importance of safety and is able to make the right choices to work in a healthy and safe manner.

That is why Eneco embeds safety within all business processes. Our management system offers an insight into the health and safety risks that apply to our employees. We control these risks using safe technology, training courses and personal protective equipment. We also employ a safety and access policy within the Eneco office locations.

### What does this mean for you?

Our proactive safety culture results in the following safety principles, which apply to everyone:

1. Set a good example regarding safety and visibly encourage safe behaviour. For example, always wear the prescribed personal protective equipment.
2. Report unsafe situations and accidents to the designated reporting line immediately. We learn from discussing these situations and from finding and implementing solutions.

3. You give and receive feedback about safety in a respectful way.
4. Follow the safety regulations and report any deviations.
5. Do not only focus on your own safety, but also on that of colleagues and customers. We need to stay 'collectively alert'.
6. If you are responsible for creating a new process, project or product, always examine the safety risks throughout the chain. For instance, focus on a safe design, procurement conditions and safety plans.
7. Ensure that our partners and contractors at least demonstrate the safety behaviour desired by Eneco.
8. If applicable, wear your access badge visibly whilst on Eneco premises. You are also responsible for escorting visitors around our premises.

The safety and wellbeing of our employees, customers and the environment are a priority for Eneco. It is your responsibility to be aware of and to apply the safety procedures.

Report unsafe situations or safety incidents via [Intranet](#).

## Diversity and inclusivity

In our organisation we consider it important that we work with teams in which diversity of background and personality are a reflection of our society. Because if we are to realise our strategy, we need people with many different talents and different personal backgrounds. In diverse companies, teams devise more creative and innovative solutions. People feel safer and more satisfied, which means that we can achieve better results.

Diversity is inextricably linked with inclusivity. Inclusivity means creating a working environment in which the diversity of people comes into its own. Or, in which everyone, with all their individual characteristics and differences, feels welcome, respected, safe and supported.

Within Eneco we aim for a staffing that is a reflection of society and for a culture in which all differences and capacities of people come into their own.

### What does this mean for you?

Encourage 'thinking differently' within your team so that the most diverse ideas, opinions and skills are used.

Also be aware of unconscious biases in yourself and stay open-minded. Be aware of the differences and sensitivities that can be present between sexes, gender identities, gender expressions, different cultures, people with different migrant backgrounds, educational levels, different types of neurodivergence, etc. What is acceptable for one person is perhaps not acceptable for another.

## Discrimination

All our employees have equitable opportunities. Eneco's basic principle is to have 'the right person in the right place'. We make decisions on recruitment, appointment, promotion, terms of employment and termination of contracts based on non-discriminatory, objective criteria.

We make no unlawful distinctions on the basis of race, sex, skin color, gender identity and gender expression, age, religion or belief, origin or nationality, sexual orientation, marital status, parenthood, political affiliation, (chronic) physical or mental disability, neurodivergence or any other legally protected status.

We make no unlawful distinctions between people.

### What does this mean for you?

Everyone has equitable opportunities at Eneco. Managers and HR employees are familiar with the applicable statutory regulations. We check whether our decisions about new or existing employees are ethically sound, and we never discriminate.

If you have grounds to suspect discrimination, notify your manager, or the designated reporting channel (see page 7).



## Development and remuneration

We offer a benefits package in line with the market. We also stimulate employee career opportunities by offering training or internal promotion. By setting realistic and measurable goals, we prevent the employees' pressure to achieve from becoming excessive.

Several function groups are eligible for bonuses. We operate a largely modest bonus policy with transparent targets set in a timely manner.

### What does this mean for you?

Keep on taking the initiative to develop yourself. Talk to your manager about what you need.

Together with your manager you can stay aware of perverse incentives for bonuses. It can never be the case that the work you do and that contributes towards your bonus is in conflict with Eneco's interests.

Eneco offers its employees a motivating benefits package in line with the market and operates a modest bonus policy. Objectives are determined with your manager.



## Employee privacy

We process the personal data of our employees. It is important to us that this personal data is handled carefully and confidentially. Eneco always acts in accordance with privacy legislation, in which connection we respect our employees' personal lives.

This means, amongst other things that we will only process your personal data if there is a legal basis for this (a 'ground for processing data') and the processing is consistent with the purposes for which we obtained the data. If we outsource the processing, for example for salary administration, we adhere to privacy principles and conclude processing agreements with the relevant supplier, if necessary.

We are careful to protect the privacy of our employees. We have laid down the rules in various internal guidelines.

### What does this mean for you?

Eneco can process your personal data, for example to implement the employment contract. Eneco has established a Data Breach reporting line in each country in which it operates, where employers can notify us of any personal data breaches.

You can find more details on this in the Privacy Policy on the [Intranet](#).

## 5. Our employees' relationship with Eneco

Eneco strives for its employees to feel committed to the company; people who take pride in the company and its mission. We want employees to base their work on our interests and brand values. They adhere to the legal requirements and internal guidelines and directives. This section describes the agreements and frameworks to which employees should adhere, both internally towards Eneco as well as towards the outside world.



## Employee ethics

Eneco expects that you act correctly towards Eneco as employer, but also towards colleagues, customers, business clients or society. We call this 'good employee ethics'. This means that we ask that you always act in Eneco's interests, that you act with integrity and that you perform the work we ask of you within reasonable limits.

### What does this mean for you?

You should be loyal to Eneco, at work and outside of work. And during your work you should adhere to applicable legislation and our internal policy, as well as the often unwritten but just as important general norms and values.

Often, you can sense when integrity has been compromised. Ask yourself the test question whether you would be prepared to say at home that you are acting in this way. If that is not the case, discuss your dilemma in a transparent way with your colleagues or manager.

As a good employee you always act with integrity and loyalty towards your work and employer. Keep monitoring your own integrity.

## Ancillary activities

We encourage employees to be actively involved in the community. Performing an ancillary position or ancillary activities may never have a negative impact on how you do your work, or compete with Eneco or be in conflict in any other way with Eneco's interests.

Always agree ancillary activities that are paid or that possibly pose a conflict of interests with your manager and HR.

### What does this mean for you?

If your ancillary work is paid, written permission from your manager is always required. In other cases, you should discuss your ancillary activities with your manager, certainly if there is a risk of a possible conflict of interest.

If ancillary work is paid and/or poses a conflict of interest, check with HR regarding the applicable obligations. For advice you can also contact the compliance contact.

## Private investments

If you invest privately, you can consciously or unconsciously benefit from the knowledge you have acquired while working at Eneco. This is forbidden by law. Keep private and business matters separate. Always consult our private investments policy.

### What does this mean for you?

If you have access to information that is company-sensitive or price-sensitive, you should not use this, unless this is permitted for your work. If you work for Eneco you should not invest in:

1. Eneco business clients, if this is likely to create a conflict of interest
2. companies that Eneco is considering acquiring.

Furthermore, if you work for Eneco you may only hold or trade in financial instruments issued by Eneco itself, if this is explicitly permitted by Eneco.

If you are part of the specific group of insiders with knowledge of company-sensitive or price-sensitive information about Eneco you may not invest privately in the products in which Eneco trades.

If you have any questions or concerns, please contact the Compliance Officer.

You can find more details in the [Private Investments Policy](#) on the Intranet.

For private investments, you are aware of the risk of conflicts of interest and consult the Private Investments Policy.

## Working from home

Eneco's general objective is to facilitate healthy, effective and attractive working conditions, at the office, at home or mobile. We believe in the vision that you work at the times and the place that best suits the activities you are doing at that moment.

This means that we embrace flexible and hybrid working. By flexible working we mean working at flexible times. By hybrid work we mean the performance of your work at a different place than your stand or a work location, for example from home. This also contributes to less travel time (CO<sub>2</sub> reduction but also lowering congestion and traffic).

We believe it is important that hybrid and flexible working always lead to mutual benefit for you as an employee and for Eneco. It is important to always make the right decisions. The personal interests and interests of Eneco and your colleagues can turn out differently for everyone.

The basis is that Eneco trusts you and that you reward this trust with your sense of responsibility towards Eneco. Transparency and accessibility for your colleagues are very important here. Therefore, always agree with your manager how you do this and share this with your colleagues.

### What does this mean for you?

We welcome you making your own choices in organising your working day, adding value to your personal life and thus your health and happiness at work. However, this should never have a negative impact on your work. For example, if you have multiple meetings during the day, you cannot easily move your working time to the evening or the weekend. You always discuss the choices that may affect your work with your manager and make sure you can be contacted easily. Also make sure that you have a good workspace with the right facilities. Eneco can help you in this.

Hybrid working and flexible working are possible on the basis of mutual trust and arrangements with the manager.

## Handling company information

All corporate information is confidential and should only be shared when required by the work at hand.

### Archiving

Each employee is also responsible for maintaining and organising his or her own files, in accordance with the applicable procedures. You should also make back-ups and observe the retention periods.

### Clean desk & clear screen

We always keep our workspace tidy and do not print documents unless absolutely necessary. Printed documents with sensitive business information are stored in a locked area. Computer screens should also not be left switched on if you are not at your desk.

### Reliable data

We are all obliged to ensure that our files and reports are of the appropriate quality and are therefore accurate, consistent and up-to-date.

Our reporting, financial or otherwise, also always meets the standards of our accounting requirements, which in turn are in conformity with IFRS (International Financial Reporting Standards) and GAAP (local 'Generally Accepted Accounting Principles').

### What does this mean for you?

Always check whether the information you are sharing can really be shared. If you are going to share sensitive business information with parties outside Eneco, request a declaration of confidentiality. Contact a lawyer for this.

Handling sensitive business information with care and in confidence is vital to Eneco. Remember to keep a clean desk and clean screen and handle sensitive business information with particular care.

5.6

## Fraud and theft

Fraud can have a considerable impact on the finances and reputation of our company. Fraud comes in many forms. Examples of fraud include falsifying documents, embezzlement of company resources, theft, misuse of authorisations, billing fraud and annual accounts fraud. If we suspect fraud or theft we will report this to the police.

We have a zero tolerance principle with regard to fraud and theft. Always report fraud or theft immediately.

### What does this mean for you?

Avoid misunderstandings and make transparent agreements with your manager about what is and what is not allowed. If you feel reluctant to be open with colleagues or managers about what you are doing, that strongly suggests you are in the wrong.

Always be alert to fraudulent behaviour among colleagues. If you are aware of or suspect an instance of fraud or theft, notify your manager immediately or report this to the Compliance & Integrity reporting channel.

5.7

## Intellectual property

Our intellectual property rights refer to the rights vested in Eneco to our own 'intellectual creations', such as our trademarks, logos, slogans, tradenames, inventions, texts and photographs. All intellectual property rights created by an employee during the performance of his or her work are vested exclusively in Eneco.

### What does this mean for you?

Our intellectual property rights are extremely valuable. Make sure that you contact Legal in the case of any new product, name or other creation so that the associated rights can be registered. We also respect all the intellectual property rights of third parties.

Eneco will always protect its intellectual property rights. Contact Legal for advice and to have the rights registered.

5.8

## External communication

If you are communicating with the outside world for your work, you always act as Eneco ambassador. You should use your common sense and professional judgement. You are always positive about Eneco and do nothing that could harm the company or brand. If you are communicating on behalf of Eneco, ensure that you have always agreed your position internally with the responsible manager.

### What does this mean for you?

Social media communications on Eneco's behalf may only be done by the responsible communications department. You are also an Eneco ambassador on your own social media. Remember that posts on the internet are often difficult to delete and can take on a life of their own.

If you are to participate in an external discussion where you will be representing Eneco's position, such as a sector consultation, you should discuss that position internally first.

You always communicate to the outside world in the role of Eneco ambassador, based on internally agreed positions.

5.9

## Retrieving and changing customer data

If your position allows you to access or change customer data, you will only access or change those data in respect of which this is required for the performance of your duties. Consequently, you may not access customer data if there is no work-related reason for doing so.

With a view to the risk of a conflict of interest, it is also not permitted to inspect customer data or make changes if this concerns yourself, your family, one of your immediate colleagues, neighbours or friends. You should hand the request to a colleague for processing.

### What does this mean for you?

Avoid viewing or making changes to your own account or the account of an acquaintance at all times. Ask a colleague to do this. If you are not sure, consult your manager.

You should only change or view customer data if this is work related and if it does not concern you or people known to you.

## Using company equipment

The Eneco IT or operating assets that are provided to you on loan such as a company car, internet, telephone, safety clothing, tools or a laptop are intended for business use. It is important that you handle these carefully, sustainably and in a cost conscious way.

Exercise due care when using the equipment provided to you on loan.

### What does this mean for you?

Treat equipment provided to you as you would like people to treat your own property. Specific rules or procedures often apply to the issue of company equipment.

### Company van or car

Adhere correctly to both the statutory traffic regulations as well as the internal regulations regarding the use of company or lease cars. For example, do not use a mechanic's van as a removal van on weekends and stay clear of 'road-bullying behaviour' when driving an Eneco car or van.

### Telephone and IT resources

PDA's, laptops and mobile phones are prone to theft and often hold important company information. Keep them secure and never leave such items unattended in your car.

For personal purposes only make incidental use of the facilities made available by Eneco such as facilities for telephone and internet. If applicable, please adhere to our internal policy.

The use of these facilities may also never be unethical or illicit for instance, by sending threatening, sexually intimidating or racist messages. When using the Eneco network you may also not view websites that are considered pornographic, racist, or otherwise offensive in any way.

### Leftover materials

There may sometimes be materials left over after a project has been finished. Make sure that leftover materials are returned in accordance with the rules and procedures and do not take them home for personal use.

## Substance intake

Do not use any medicines, addictive or narcotic substances that could affect your ability to do your work properly, unless expressly prescribed by a doctor. The use of such substances outside work must also never have any impact on your performance at work.

### Smoking

Smoking is prohibited in our buildings and Eneco vehicles. Smoking is only permitted in designated areas. An occasional cigarette break is permitted. Where several cigarette breaks are taken, the time should be made up. Discuss this with your manager.

### Alcohol

Work while under the influence of alcohol is prohibited. During business functions such as a leaving party, a company party or a business lunch, alcohol may be consumed if you drink in moderation and behave appropriately.

Furthermore, you do not drink if you will still participate actively in traffic after the function.

### What does this mean for you?

Be aware that you will not be able to carry out your work properly if you are under the influence of drugs or alcohol and that you will therefore be jeopardising the safety of others as well as yourself.

Exercise restraint in consuming alcohol during a business function: drink in moderation, never more than legally permitted and always behave appropriately. If, after the business function, you decide to have a few drinks with colleagues, you can still be associated with Eneco and should still behave appropriately and act as an Eneco representative.

As the person responsible for organising an Eneco drinks function, you should ensure compliance with the rules.

Our employees never work under the influence of addictive substances and only drink alcohol in moderation during business functions.

## 6. Relationships between employees

It is very important that relationships between colleagues are conducted with integrity as well. Our culture is based on clear and friendly communication with one another. In this chapter we describe the conduct our employees can expect of each other to ensure a pleasant and productive working relationship.



6.1

## Mutual cooperation

Our employees are entitled to expect to be treated with respect by their colleagues. We stick to our agreements and are honest. We communicate in a friendly manner, treat each other as equals and focus on cooperation.

### What does this mean for you?

Within Eneco, you cooperate well and help each other. You do not operate from a silo mentality but always focus on the joint result.

Be involved and demonstrate interest in each other's work and personal lives. Also show appreciation if someone performs well.

It is important that your colleagues can rely on you. So stick to your agreements. Always send e-mails in time and arrive on time for meetings. Being meticulous about this yourself can save time and avoid feelings of frustration. Don't make promises you can't keep.

Our employees focus on cooperation. Team interests come before personal interests. Cooperation means that you also adhere to agreements and that you are committed to each other.

6.2

## Feedback

Good cooperation and feedback are closely connected. A good culture of giving and receiving feedback takes cooperation to a higher level and exposes bad routines or undesirable behaviour.

### What does this mean for you?

Don't be afraid to give feedback! Even to your manager. Give constructive feedback that is not pedantic but is still clear. You generally give feedback by indicating the consequences you experience as a result of someone's actions. Without judging the other person. Also, do not act defensively when you receive feedback, but consider this as positive advice.

As manager you can set a good example by asking for feedback and stimulating employees to give feedback to each other.

Do not talk about another colleague in a negative way if he or she is not there. Gossip can end up causing harm. It gives someone a stigma that is difficult to get away from.

Be receptive to advice or criticism, and don't be afraid to give these either. And - speak to each other, not about each other

6.3

## Discrimination

Within Eneco there must be no question of discrimination. Discrimination can be defined as making 'unjustified distinctions', and is punishable. Everyone has a right to be respected regardless of their origin or nationality, religion, beliefs, political affiliation, sex, age, sexual orientation or any other grounds.

Not discriminating against each other is a condition. But go further than that. Be aware of any unconscious biases, treat each other as equals and put each other's differences to good use.

### What does this mean for you?

Personal feelings, prejudices and preferences may not influence your work-related decisions towards a colleague. Treat each other equally. You wouldn't like your colleagues to single out particular qualities of your own and treat you differently. Certainly do not make any discriminatory jokes to or about one another, even if they seem innocent. You never know how the other person might take it.

If you ever feel discriminated or observe discrimination within the company, you can discuss it with the confidential advisor or the designated reporting line (see page 7).

6.4

## Sexual intimidation

Any form of sexual intimidation is unacceptable at Eneco. Sexual intimidation covers all kinds of sexual innuendo or images, or unwelcome sexual attention. This can vary from an intimidating way of looking or talking to physical touching with sexual intent and/or effect.

### What does this mean for you?

Refrain from obscene or sexual remarks or physical touching with sexual intent. A pat on the shoulder is not always a good idea. Be aware that the other person could experience your touching or comment in a different way than you intended.

Any kind of sexual intimidation is unacceptable and can be a sackable offence.

Discuss sexual intimidation. Even if you think your situation is not that bad, you can discuss your feelings with the Confidential Adviser, a social worker or the designated reporting channel (see page 7).

6.5

## Bullying

Any form of bullying is unacceptable at Eneco. Bullying can take many forms, varying from making jokes, mocking and excluding someone to physical humiliation.

There's a thin line between banter and bullying. Banter is funny for everyone and you can always respond. If the same colleague is teased for a long time or a lot, this could be considered a pattern and the person may no longer find this funny. Then it has become bullying. There is always a power imbalance in bullying.

Any kind of bullying is unacceptable and can be a sackable offence.

### What does this mean for you?

Bullying happens more often than you think. Remember that someone can experience a joke in a different way than was intended. Stand up for your colleagues and put a stop to it.

And if it happens to you, don't just leave it, seek help from your manager. You can discuss it with the confidential advisor, a social worker or report to the designated reporting line (see page 7).

6.6

## Aggression or threatening behaviour

Physical and verbal aggression or threatening behaviour is unacceptable at Eneco. Such aggression damages the safe working environment to which every employee is entitled.

We do not tolerate any kind of verbal or physical aggression. We handle conflicts in an adult way by discussing the situation openly and listening to all parties concerned.

### What does this mean for you?

Be aware that aggression need not always be physical. Words can be used equally aggressively. There is a fine line between verbal abuse and aggression. Don't become involved in a conflict. Intervene quickly and address aggressive behaviour.

Report conflict situations that risk getting out of hand or are out of hand to your manager or the designated reporting line (see page 7).

6.7

## Abuse of power

Our employees may not abuse their positions in any way in the pursuit of personal or business gains. Abuses of power are defined as situations where a manager uses his or her position in a manipulative way, at the expense of or to the advantage of an employee.

Examples include deliberately withholding information, being excessively critical, blackmailing or making false accusations against someone. Transfers, delegating unpleasant tasks or asking someone to disobey certain rules can also be abuses of power. And vice versa, it is also not permitted for a manager to show favouritism towards an employee.

Managers are aware of their position of power and never abuse this.

### What does this mean for you?

As a manager, you often find yourself in a certain 'position of power'. An employee's idea of leadership might be different to yours. Always view employees and their work performance objectively.

6.8

## Personal relationships at the workplace

Personal relationships between colleagues can sometimes lead to gossip or tension. They can also lead to conflicts of interest, whether real or perceived.

Colleagues who have a personal relationship are asked to be transparent about it to their manager\*\*. Intimate relationships are tolerated, as long as professional and courteous conduct is maintained at all times.

Be careful with personal relationships at work. Personal relationships should not affect any work-related decisions, such as promotions, other benefits, or termination.

### What does this mean for you?

It is fine to be friends with your colleagues. Please keep an appropriate distance and transparent communication of personal relationships to your manager.

\*\* Not applicable if this is not permitted by local legislation, e.g. in Germany.

# 7. Cooperating with external relations

Eneco maintains external relations with various external parties, including suppliers, banks, regulators, government agencies and other business partners. We want to be a reliable, friendly partner to these external relations. This section describes what external relations are and what we can expect from them when we work together.



7.1

## Integrity from and towards business partners

We are reliable towards our business partners and are always ethical in our treatment of them. We are clear in what we can achieve and we honour our agreements, aiming for mutually beneficial relationships.

We want to do business with partners who share our norms and values with respect to responsible business conduct. We also seek collaboration with partners who share our sustainable ambitions. We therefore expect that our business clients act in an ethical, socially responsible and sustainable way. We never have dealings with (suspected) criminals, nor do we have any part in transactions involving the proceeds of crime.

We work with ethical business partners that feel responsible for good social and sustainable performance.

7.2

## New business partner

If we want to start a commercial relationship with a new business partner, we assess the extent to which an investigation into creditworthiness and antecedents is needed. An investigation is needed if there are one or more risk indications.

Extensive due diligence is compulsory before entering into bigger partnerships, mergers or acquisitions. Due diligence is also compulsory where it is believed possible that potential business partners appear on sanctions lists or are labelled as 'Politically Exposed Persons' (see H. 2.3). The nature and scope of the due diligence are proportionate to the extent of the risks to which we may be exposed.

If we start a relationship with a new business partner, we check whether an investigation is needed and if so, which investigation.

### What does this mean for you ?

Contact the compliance contact if you want to discuss whether an investigation is needed, if you want an investigation to be conducted or if you suspect that an existing or prospective business partner is involved in criminal activities.

7.3

## Selection of suppliers

We also expect our suppliers that they, like we, take responsibility in the chain for corporate social responsibility and sustainable business. For this reason we ask our suppliers to sign the Supplier/ Business Partner Code of Conduct. In this way the supplier declares that it will respect human rights and good governance and refrain from such things as money laundering and corruption.

We expect our suppliers to also select their own suppliers according to the guidelines in our Supplier Code of Conduct.

We expect our suppliers/business partners to sign our Supplier/ Business Partner Code of Conduct and in doing so safeguard ethical, socially responsible and sustainable business.

7.4

## Business conflict of interest

In our work we only take decisions in the interest of our business, without being influenced by other interests. It is then also important to avoid situations in which conflict can arise between Eneco's interests and your own personal interests. We try to avoid even the appearance of a conflict of interest.

If conflicts of interest could arise or seem to have arisen, discuss this in a transparent way with your colleague, manager or compliance contact.

We avoid any conflicts between our personal and business interests and take decisions based on business considerations.

## Conflict of interests relating to gifts and entertainment

### General policy

Promoting a sustainable relationship with our business partners also involves demonstrating appreciation and creating goodwill. In this connection, Eneco permits offering or accepting gifts or invitations for entertainment. However, gifts and entertainment may never influence the transparency of our business decisions or influence the loyalty of the persons involved. The starting point is that offering or receiving gifts or entertainment should always be 'fitting and reasonable'. Furthermore, there is a registration and/or approval process.

### Policy for gifts

1. Gifts with a value of more than 50 euro must be registered and always require approval;
2. Gifts are never offered or received at a private address;
3. When gifts are repeatedly (more than twice a year) offered to or received from the same person, seek advice from the Compliance Officer.

### Policy for entertainment

To give proper consideration regarding whether organizing or receiving entertainment is 'fitting and reasonable' the following additional questions apply. If the answer is no to one or more questions, this gives you a good indication that you should say no to the invitation:

1. there is a good business reason for the invitation;
2. the invitation is not made during negotiations;
3. an actual meeting with the business partner takes place during the event;
4. the event does not include an overnight stay and is not disproportionately luxurious;
5. the image of the event is appropriate for Eneco.

All forms of entertainment must be registered and require an approval process when government officials are involved, and in all cases when the value exceeds 200 euro.

## Contacts with government agencies

Government agencies are important stakeholders for Eneco. Sometimes we have conflicting interests, but generally our interests are similar.

Eneco aims to always be a good and suitable partner to government agencies and seeks sustainable, long-term relationships. For contacts with government officials, additional requirements apply regarding entertainment. See paragraph 7.5 for details.

Contacts with supervisory bodies Eneco works with a number of supervisory bodies, including the European Commission, the Netherlands Authority for Consumers and Markets (ACM), in Belgium the Flemish Regulator of the Electricity and Gas Market (the VREG) or in Germany the Bundes Netz Agentur (BNetzA).

Supervisory bodies are important discussion partners for us, which is why we invest proactively in building good relationships with all our supervisory bodies.

### What does this mean for you?

Always check the policy before offering or accepting any gifts or invitations and discuss this in a transparent way with your manager. If applicable, follow the internal registration process.

Also check the [Anti-Bribery & Corruption Policy](#) on the Intranet for dilemma examples and if in doubt, ask Group Compliance & Integrity for advice.

Gifts and entertainment may never influence the transparency of our business decisions. Give and accept these openly and without conditions. As criterion it applies that gifts and invitations for entertainment should always be 'fitting and reasonable'.

## Sponsorship of events or external relations

Supervisory bodies may request information from us about our business processes and data. Usually these are announced requests. However, sometimes supervisory bodies may undertake unannounced investigations ('raids'). Our starting point is that we always cooperate with supervisory bodies.

Government agencies are important stakeholders for us and we seek active dialogue with them. Transparency is the starting point.

### What does this mean for you?

We involve government agencies in our plans in a timely way, seek open dialogue and make honest, transparent agreements together. We always cooperate with a supervisory body's verification requests. In the case of a raid, we act in accordance with our specific policy regarding raids, which can be found on the [Intranet](#).

Eneco pursues a socially-oriented sponsorship policy.

We also take part in sponsorship to add significance to the positioning of the Eneco brand, to boost our image and to cement our relationships with stakeholders. Any event or project that we sponsor must be something that Eneco identifies with.

Our sponsorship policy also focuses on educational programmes for young people so that we can engage the next generation in the energy transition.

All our sponsorship activities are conducted through the Communication department and must be aligned with the vision, mission, strategy and positioning of the Eneco brand.

### What does this mean for you?

Sponsorship requests are always handled by the corporate Communication department, even where the sponsorship would be paid from the business budget.

For more information, check the Sponsorship & Donations Policy on the [Intranet](#).



# Index

## A

Abuse of power	6.7
Aggression	6.6
Alcohol	5.11
Ancillary activities/positions	5.2
Archives	5.5

## B

Bonus	4.6
Bullying	6.5

## C

Claiming expenses	5.6
Clean Desk	5.5
Communication	
Employees	5.8
Customers	1.1
Company information	4.7, 5.5, 5.9
Competition	2.3
Computer use	5.10
Conflicts of interest	
Employees and Eneco	5.1, 5.2, 5.3, 5.9
Between employees	6.8
Business clients	7.4, 7.5
Cooperation	6.1
Corporate gifts	7.5
Corporate Governance	3.1
CSR	2.2
Customer orientation	1.1
Customer recruitment	1.3

## D

Discrimination	
Eneco and employees	4.5
Between employees	6.3
Diversity	4.4

## E

External representation	5.8
Extortion	5.6

## F

Fraud	5.6
-------	-----

## G

Good corporate governance	3.1
---------------------------	-----

## H

Health	4.2
--------	-----

## I

Intimidation	6.4
Invitations	7.5

## L

Leftover materials	5.10
--------------------	------

## O

Operating assets	5.4
------------------	-----

## P

Personal relationships at work	6.8
Privacy	
Customers	1.2
Employees	4.7
Private investments	5.3

## R

Remuneration	4.6
--------------	-----

## S

Safety	
Eneco and employees	4.3
Sexual intimidation	6.4
Shareholder value	3.1
Smoking	5.11
Social Media	5.8
Social networks	5.8
Sponsorship	7.7
Substance abuse	5.11
Supervisory bodies	7.6
Sustainability	2.1, 2.2

## T

Telephone usage	5.10
Theft	5.6
Threats	6.6
Training/development	4.6

## W

Working from home	5.4
-------------------	-----

## V

Verification request	7.6
----------------------	-----



Marten Meesweg 5  
3068 AV Rotterdam  
P.O. Box 8208  
3009 AE Rotterdam  
[www.eneco.com](http://www.eneco.com)

January 2026. This is an internal Eneco publication, produced by Eneco Compliance & Integrity.  
No part of this publication may be reproduced or copied without prior permission from the publisher.

