

# Integrity Incidents and Malpractice Guideline

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We have established rules on how we interact with each other at Stedin Group. We find it important to provide a comfortable and safe working environment for everyone at Stedin Group. This is why we call each other to account in the case of unwanted conduct.

If you are confronted with conduct that violates our internal code of conduct (unwanted conduct), you can discuss this with your supervisor or report it to the Integrity Hotline or the Compliance Officer. You can also make an anonymous report.

## Starting points

### Integrity incidents and malpractice

Conduct that violates our internal code of conduct is referred to as an integrity incident. Examples include sexual harassment, aggression and violence, bullying, discrimination and alleged abuse of power.

Serious or structural conduct that violates our internal code of conduct is referred to as malpractice. Such cases often impact the interests of society.

In general, malpractice concerns unethical conduct or situations that pose a threat to public health, the safety of employees or other persons or the environment. It also includes waste of funds – in particular government and Stedin funds – as well as non-compliance with legislation or regulations.

### Reporting an integrity incident or malpractice

If you suspect an integrity incident or malpractice is taking place within Stedin Group, you have three options:

- Discuss it with your manager.
- Make a report to the Integrity Hotline or the Compliance Officer.
- or
- Start by contacting a confidential counsellor, for example if you do not want your name to be known to the Integrity Hotline or the Compliance Officer.

If you make a report based on the right intentions and in the proper manner, this should not reflect negatively on you. Your rights as an employee will be protected. This also applies to the rights of witnesses and other persons involved. It goes without saying that the colleagues who are handling a report will keep the case confidential (they have a duty of confidentiality).

Notifications are handled in accordance with the Reporting and Handling Integrity Incidents and Malpractice Policy Instruction.

### Confidential counsellor

If you wish to stay anonymous, you can discuss the conduct or situation with a confidential counsellor. You can also contact a confidential counsellor if you want to discuss in advance what making a report to the Integrity Hotline would entail for you. The confidential counsellor is there for you and has a legal obligation of confidentiality. The confidential counsellor can support you and tell you what your rights and obligations are. The confidential counsellor can also help you assess the consequences for you if

you decide to make a report. Who the confidential counsellors within Stedin Group are can be found on the intranet.

If you wish to stay anonymous, it may not be possible to solve the problem, because the person or department where you have observed the conduct or situation will not have the opportunity to respond to your accusations. There will be no possibility of a fair hearing in which both sides can be heard.

### **Possibility of making report in exceptional situations**

Reports made to the hotline ([integriteit@stedin.net](mailto:integriteit@stedin.net)) always come to the attention of the Compliance Officer, either directly or via a representative of the Integrity Hotline. If you wish to report an incident involving the Compliance Officer or if you disagree with the way the Compliance Officer has handled your report, you may report this directly to the Board of Management. In exceptional situations, you can contact the Supervisory Board or the Investigations department of the Dutch Whistle-blowers Authority (Huis voor klokkenluiders). More information on the Dutch Whistle-blowers Authority can be found in the questions and answers section. Be aware that making an external report may be harmful for Stedin Group. Therefore, think carefully before you take this step or, for example, first discuss this step with a confidential counsellor.

### **Legal basis**

Everyone affected by this guideline is obliged to abide by the laws and regulations associated with it. Examples include our internal code of conduct, as well as what we have agreed in the area of personal data protection. There is also a Dutch Whistle-blowers Authority Act. More information on this Act can be found in the questions and answers section.

## **What does this mean for you in practice?**

If, in your work, you are confronted with conduct that violates our internal code of conduct or with serious unwanted conduct or situations (malpractice), such as insults, sexual or other forms of harassment, fraud or discrimination, discuss this with your manager or make a report to the Integrity Hotline of Stedin Group or to the Compliance Officer.

Make an appointment with a confidential counsellor if you wish to stay anonymous or if you want to discuss in advance what making a report would entail for you.

For questions about the guideline, please contact the Compliance Officer.

## **Questions and answers**

### **What can be reported?**

You can make a report if you are confronted with conduct that violates our internal code of conduct or with serious unwanted conduct or situations (malpractice) at Stedin Group.

Examples of conduct that can be reported:

- insult;
- fraud;
- sexual or other forms of harassment;
- abuse of power;
- discrimination;
- conflict of interest;
- trading with inside information;
- personal violence or threats;
- misuse of company equipment;
- expense claim-related conduct that is not in line with the policy of Stedin Group;
- non-ethical business operations;
- violation of laws or internal rules.

### **What cannot be reported?**

The Integrity Hotline is not intended for reports of safety incidents related to work within Stedin Group. The Alerta system must be used for that purpose. Also, do not use the Integrity Hotline if you have a difference of opinion on a business matter. General criticism of Stedin is also not the terrain of the Integrity Hotline. Contact the HR department in the case of criticism relating to your employment agreement or the results of a performance review by your manager.

### **Who is allowed to report?**

Anyone who works for Stedin Group or is present in one of our offices or at one of our locations can make a report. This includes interns and external staff working for Stedin Group. You do not have to be the victim of an integrity incident or malpractice. You can also make a report if you have seen or heard of unwanted conduct or situations. The Compliance Officer is also allowed to make a report at his/her own initiative.

### **Where and how can you make a report?**

Integrity incidents and malpractice can be reported to the Integrity Hotline directly by sending an email to [Integriteit@stedin.net](mailto:Integriteit@stedin.net). The Hotline will process your report as soon as possible. During office hours, the Hotline can also be reached by telephone: +31 (0)88 89 63 112. You can also contact the Compliance Officer or integrity officer. The chair of the Supervisory Board can be contacted through the company secretary.

### **What is the impact of the Whistle-blowers Authority Act on me?**

The Whistle-blowers Authority Act came into effect on 1 July 2016. This act provides an additional way to report malpractice at work. The act assumes that you first report the malpractice within Stedin Group. However, if you believe that Stedin does not act on your report or does not handle it properly and if it also serves the interest of society, then you can go to the Whistle-blowers Authority.

The Whistle-blowers Authority is not the place to go for personal problems such as a conflict with your manager. The Whistle-blowers Authority can give you advice or investigate malpractice. The Whistle-blowers Authority will prepare a report on the investigation and will also make the investigation public. For further information see: [www.huisvoorklokkenluiders.nl](http://www.huisvoorklokkenluiders.nl)

## Annex

### **Advice from the Compliance Officer**

Contact the Compliance Officer if you still have any questions after having read this guideline. The contact details of the Compliance Officer are available on the intranet.

### **Management of this guideline**

The Compliance Officer is responsible for the management of this guideline. He provides advice to the owner of the guideline and assists the business units of Stedin Group in the proper implementation of the guideline.

### **Compliance Officer**

The Compliance Officer is the internal supervisor.

### **Owner of the guideline**

The owner of the guideline is the department within Stedin Group that has drawn up the guideline. The owner of the guideline is responsible for the content of the guideline.

### **Code of conduct**

By code of conduct we mean our general internal rules of conduct. The code states what we expect from an employee, what an employee can expect from us and how we interact with each other, customers and business contacts.

### **Employee**

You are an employee if you

- a. have or will be concluding a permanent or temporary employment agreement with Stedin Group;
- b. have concluded an internship agreement with Stedin Group – this also includes traineeships;
- c. work for Stedin Group on the basis of a secondment or freelance agreement or a hiring agreement with a third party and have been or will be assigned a personnel number.

### **Making a report**

If you see or hear that an employee is not complying with this guideline, you can report this to the Integrity Hotline. If you wish to stay anonymous, you can also make a report to the confidential counsellor. Information about who the confidential counsellors are can be found on the intranet.

### **Improper conduct**

It is impossible for us to cover every possibility in a guideline. If you are acting in a way that is not described in, but may be contrary to the spirit of this guideline, this will be reported to the Compliance Officer.

### **Guideline**

The Integrity Incidents and Malpractice Guideline of 1 July 2017.

### **Sanctions**

We trust that employees such as yourself will apply this guideline properly and that you will act with integrity. If you fail to do so, your manager and the HR Business Partner will speak to you about this. They will decide if the violation will have consequences for you. If they consider the violation to be very serious or if it is not the first time that you have not conducted yourself properly, they may decide to terminate your employment contract, possibly even with immediate effect.



**Stedin Group**

In this guideline, Stedin Group refers to Stedin Holding N.V. and all its associated companies.

**Employee obligations**

Employees must make sure that they are familiar and comply with this code of conduct. This is your own responsibility. Consult your manager or the Compliance Officer if you have any doubts about whether or not to do something.

**We or us**

In this guideline 'we' or 'us' refers to Stedin Group.