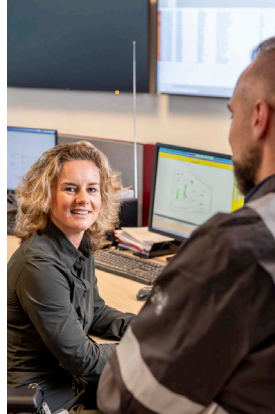




# CODE OF CONDUCT FOR WORKING TOGETHER



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# Foreword by the Executive Board



Dear colleague,

Gasunie plays an important role in the current energy system and in facilitating the energy transition. On the path towards 2050, Gasunie is committed to supporting society in achieving Net Zero CO<sub>2</sub> emissions. Society depends on us to fulfil our responsibilities diligently and in the public interest. In addition to transporting natural gas, we focus on the transport of hydrogen, CO<sub>2</sub>, and green gas, as well as on heat networks and CO<sub>2</sub> storage.

We have many years of extensive expertise in the field of energy. This experience accompanies us in the transformation from a natural gas transport company to an energy infrastructure company. However, throughout this journey, we occasionally encounter complex dilemmas. To address these dilemmas effectively, it is important that we adopt an open mindset, characterized by honesty, sincerity, and a genuine curiosity about each other and our environment, including our customers and other stakeholders. This attitude reflects our willingness to be vulnerable, learn from one another, remain attuned to the world around us, embrace new knowledge, and pursue personal growth - all this with the aim of accelerating the energy transition.

This Code of Conduct outlines how we aim to work together constructively and positively towards achieving a sustainable energy supply.

While many aspects may seem self-evident, it is important to establish clear expectations of one another. Our leaders are expected to set a strong example in this regard, but the same applies to each of us.

As we work towards our goals, we will inevitably encounter dilemmas or uncertainties. We encourage an open dialogue on these challenges and invite you to be receptive to one another's perspectives. By doing so, we can learn from each other and achieve the best possible outcomes – outcomes that align with the learning organization we aspire to be at Gasunie.

As the Board of Directors, we are confident that we can rely on your extensive experience, knowledge, skills, and your daily commitment and motivation. We deeply appreciate your contributions. We believe that this Code of Conduct serves as a good guide for working together towards a promising future. Should you have any questions or comments regarding its content, we would be happy to discuss them with you.

Kind regards,  
On behalf of the Executive Board  
Willemien Terpstra  
september 2024



# Working Together

The theme of this Code of Conduct is that we work together for a reason and together we will achieve Gasunie's strategic objectives. Many themes from this Code of Conduct will sound very obvious. Some we have been doing for a long time but others need further enhancement, such as giving feedback, handling social media, daring to make mistakes and inclusivity.

Now and then you will be confronted with dilemmas and it is good to discuss such cases with someone or get someone else involved. You can read more about this at the end of these Code of Conduct, under: 'You don't have to face dilemmas alone'. There you will also find who to approach should you wish to discuss anything.



**Helmie Botter,**  
Manager Business  
Development  
Hydrogen

**'I believe that  
inclusivity  
paves the way  
for innovative  
strength in our  
company'**



# 1 We represent our company

The way in which we carry out our work and how we behave inside and outside Gasunie affects the reputation of our company. You can see from the way we work what we stand for as a company. We understand that if we keep our customers, neighbours, business contacts and partners satisfied, this ensures that we can and may carry out our work successfully.

We are aware that what we do and share privately will also have an effect on our company and our colleagues.

- We are aware that the way in which we work defines Gasunie's reputation; Gasunie's reputation ensures that we can play our part in the energy supply chain and energy transition
- We are open to what those around us have to say because we understand that we can learn from that. We share our knowledge and experience so that those around us can also learn from us
- We publicise our central, social role in the energy supply and energy transition
- We are aware that what we say about our work privately and on social media can also affect Gasunie's reputation and the reputations of our colleagues
- We seek regular, active contact with our external contacts and customers
- We treat those around us with respect and openness. We do our best to respond quickly to questions and requests from those around us



Jan Marten Spanjersberg,  
Manager Operations

'We can make a  
positive impression  
day after day'



## 2 We take responsibility

We ourselves are responsible for how we work together, for our behaviour also defines how others react to us. That is why we are aware of our own behaviour, also in our day-to-day dealings with each other.

We are ourselves responsible for our contribution towards the company's objectives, the interpretation of our own role and our personal development. If there are ambiguities in any area whatsoever, we will ask questions in order to gain clarity.

We expect our managers to set a good example but, of course, that applies to all of us.

- We will treat others as we want them to treat us
- We will think consciously about what our actions mean for our company, ourselves and those around us
- We know how we contribute towards implementing the strategy
- We know the purpose and the context of our work and we know what happens with our work output
- We ensure that we maintain our professional expertise and we continue to develop our knowledge and skills
- We are accountable for our behaviour and take responsibility for our actions
- If we are not sure about something, we ask colleagues who can help us



Janneke Hermes,  
CFO

'If we take an interest in each other, working together becomes more enjoyable and we achieve better results faster'





Jeroen Zanting,  
Manager Participations

**'Let's pay more  
attention to  
what's going well,  
that's what really  
energises you!'**

## 3 We make appropriate behaviour possible

We can only work well together when everyone knows what is expected of them. The targets we set need to be clear and achievable so that we can work in the way we have agreed together. In this context it is important for us to be able to trust and respect each other whilst having the courage to discuss what could be improved.

- We make clear agreements with each other and ensure that our targets are aligned.
- When targets are not clear, we make sure that they become clear
- We set achievable results, deadlines and budgets, at the same time keeping an eye on safety and integrity
- If we notice that we cannot work according to the Code of Conduct for Working Together because the circumstances restrict us, we discuss this with our manager, a colleague or a confidential advisor
- We make it clear to each other that we value and pay attention to desirable behaviour
- We always treat those around us with the respect that we ourselves would like to receive



# 4 We ensure that everyone can participate safely

People are all different. We want everyone to feel welcome in our organisation, irrespective of age, orientation, cultural background, gender, physical ability, educational background or lifestyle. For we believe that a diverse organisation leads to more creativity, innovation and better decisions and that everyone deserves equal opportunities and treatment. Precisely because we have a role to play in society, we think it is important for us to reflect that society as much as possible. We have respect for each other and for our differences, so that everyone can feel free to express themselves. For we can only make the best use of our talents for our company if we feel safe and comfortable.

- We promote diversity when recruiting new colleagues and assembling teams
- We spend time and attention on allowing different talents and perspectives to work together and to strengthen each other within a diverse team
- We consider all our colleagues as a valuable part of our company and work together to ensure that everyone feels they belong
- We allow everyone the space to be themselves. We respect and value our mutual differences and consider these as opportunities to recognise and use each other's talents
- We talk to each other and not about each other. If there is a problem, we discuss it with each other
- We don't just judge without any reason; we take an interest. We try to understand each other by listening to each other, asking questions and putting ourselves in each other's shoes
- We do not tolerate verbal, non-verbal, or physical unwanted behavior such as (sexual) harassment, discrimination, bullying, aggression or violence. This applies not only to the workplace but also online, by email or on social media



**Ingrid Kanger,**  
Manager Human Resources

**'We ensure that  
hat everyone can  
participate safely'**



# 5 We work safely

Safety is at the forefront of everything we do. This includes not only the safety of ourselves, our colleagues and our surroundings (neighbours, animals and the environment), but also the safety of our (personal) data and systems. Sometimes we work in complex, potentially hazardous situations and we are therefore constantly aware of the risks to ourselves and our surroundings. Only if we work safely in all these areas can we continue to carry out our social duty.

- We follow our policies, current procedures and quality standards \*
- We do not work under the influence of stimulants or narcotics, such as alcohol, drugs or medication which can have a negative effect on how we perform
- We provide a safe working environment, which includes being responsible for our surroundings
- If we are not sure about the safety of a situation, then we will interrupt our work in order to guarantee our safety



Walter Crommelin,  
Manager HSE

'If things don't  
look right to  
you, don't  
hesitate to act'



## 6 We conduct business with integrity

We believe that conducting business with integrity is an absolute prerequisite for building up a sustainable relationship with each other and with those around us. That is why we want to be able to work independently with colleagues and business contacts. We show our integrity by treating each other and those around us honestly, openly, reliably and transparently.

- We are always honest and reliable in our actions
- We avoid conflicts of interest or the appearance thereof, by acting as follows, for example:
  - We do not give or accept any gifts or services (including in our private life) that may affect our professional activities or create the appearance of a conflict of interest. This applies in any case to gifts and services with a value exceeding 50 euros, unless the Executive Board has given its explicit consent
  - We will discuss with our manager any personal relationships with colleagues or business partners so that we can avoid conflicts of interest or the appearance thereof. This applies in any case to a romantic relationship between an employee and their direct or indirect line manager, but also to a romantic relationship or personal relationship with a colleague or external business partner.
- We do not carry out any paid or unpaid secondary occupations which are contrary to the interests of Gasunie
- We handle business assets and information carefully, by acting as follows, for example:
  - We handle our business assets responsibly
  - We handle confidential information, including business information, and personal data with the greatest care
  - The information that we share with each other and with those around us is correct and as complete as possible. If we cannot be completely transparent, we need to be able to explain this to ourselves and to those around us
  - We realise that our data and systems can be hacked and therefore we handle our ICT resources securely. We follow the ICT Security guidelines here

Willemien Terpstra,  
CEO

'I have the confidence  
to speak up for what I  
think is right'



# 7 We take decisions carefully

We regularly make decisions that have consequences for society. Clear and balanced decision-making is important because we want the decisions to be accepted and carried out. However, this is not always straightforward because there are often many interests, both internal and external, to be considered. Our decisions always contribute towards our strategic objectives.

- When making a choice we carefully consider all the relevant facts, interests and arguments for and against
- We set out explicitly our deliberations and decisions so that we ourselves and those around us can assess them
- Decisions are taken as low down in the organisation as possible, in line with our company objectives
- We take decisions within clear frameworks, set by the person who is responsible for this in our organisation on account of his/her role. If the frameworks are not clear, we ask the person responsible for clarification
- We can always justify our decisions and deliberations to those around us



**Bart Jan Hoevers,**  
CEO GTS and member of  
the Executive Board

**'I make sure that  
I can explain my  
decisions clearly'**



## 8 We comply with regulations and policies

We observe legislation and regulations, social standards and our internal policy. Although this goes without saying, sometimes there are situations in which the legislation and regulations give no clear direction or in which we face dilemmas. For example, if regulations are contradictory, or if a regulation has significant implications in another area, such as safety or costs. In those cases, we provide for a thorough analysis and careful deliberation at the proper level of the organisation. Non-compliance with legislation and regulations involves not only consequences for our company and our good reputation but may also affect you directly.

- We are familiar with the applicable laws and regulations and we comply with these
- We are aware that regulations serve a purpose, such as guaranteeing safety or protecting the environment
- Sometimes social standards and values develop faster than legislation and regulations. When changed social standards and values are no longer reflected in current legislation and regulations, we have to ask ourselves: if something is allowed by law, is our choice also appropriate to the standards and values of society and to our own standards?
- When dealing with dilemmas involving compliance with regulations, we take decisions at unit management or Executive Board level

**Marijn Dresden,**  
Manager Corporate Assets

**'By discussing dilemmas with each other, we can better adhere to rules'**

# You don't have to face dilemmas alone

We do not always have the same frame of reference; so if in doubt, we come together to discuss dilemma's openly. Not sure if your actions are entirely within our agreed norms? Then ask yourself the following questions:

- Am I acting in line with the Code of Conduct for Working Together?
- Am I sure that my decision complies with legislation and regulations and internal policies?
- Is my behaviour in line with professional standards?
- Would people not working for Gasunie take the same decision?
- Can I explain my decision to those around me?
- Can I make this decision independently?
- If I make this decision independently, might that lead to questions afterwards?
- Am I sure that my actions will not damage the reputation of Gasunie or my colleagues?

If the answer is 'no' to any of these questions, it is time to talk to a colleague or to ask for help. You are not expected to do everything yourself or make all the decisions yourself. In principle you should approach your manager first, but if, for whatever reason, that is not convenient, there are other colleagues who can help you, for example:

- Our confidential advisors
- Corporate Legal department
- HSE department
- The Corporate Compliance & Integrity officer or the Compliance officer of your department
- HR department

# What if you don't comply with the Code of Conduct for Working Together?

It is important for us to be able to trust and respect each other and have the courage to discuss what could be improved. That is why we have made clear agreements about desirable behaviour in this Code of Conduct for Working Together. It forms the basis for how we treat each other and we are responsible for observing it.

Sometimes we will make mistakes but we need to learn from the mistakes we make with each other and learning from this in order to work more efficiently in the future for our company and those around us.

However, in the case of deliberate breaches of the integrity provisions of this Code of Conduct for Working Together – such as bribery, acceptance of gifts in violation of the rules, fraud, conflict of interests, invasion of privacy or abuse of persons or resources – there will be appropriate consequences.

If you notice that a colleague is not behaving according to laws and regulations or this Code of Conduct for Working Together, then it is important for you to discuss this. You can do this, at your own discretion, with the colleague concerned, your manager or a confidential advisor. You can also file a report to the Corporate Compliance & Integrity officer in accordance with the Speak up policy\*.

\* You can find more information on our intranet about our confidential advisors, the Speak up policy, our quality standards on safety and how to handle ICT Security.



