

Fluxys Group Ethical Code



ethics
& compliance.

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1. Introduction

Accelerating the energy transition and ensuring the supply of energy for Northwest Europe is why we give our best every day. Integrity is central to how we work and we consider it to be one of the most important building blocks of our ethical policy.

By applying our ethical values and commitments, we want to set an example to our stakeholders. In our Group Ethical Code, we set out the general framework of our ethical policy. It contains generally applicable principles and provides concrete starting points on how we translate those principles into practice.

When we are faced with ethically complex questions, the Ethical Code guides us towards the appropriate solution.

Everyone, without exception, at Fluxys has a personal responsibility to comply with applicable legislation and regulations as well as with this Ethical Code. If our Ethical Code is more stringent than the applicable law, we will opt for the stricter standard and apply the Ethical Code.

Together we have the opportunity to build a strong and sound organisation and give meaning to our purpose of *Shaping together a bright energy future!*



2. The values and purpose underpinning the Ethical Code

We want to be at the helm of a bright energy future. We can only achieve our purpose of shaping together a bright energy future within a culture of integrity and when our three core values actively play a role in our daily activities. Our core values form the basis of our ethical policy and are constantly reflected in the ethical commitments we make within our organisation and with the outside world.



We value the **unique** nature of each individual.

We ensure the **safety and well-being** of our **staff members**.

We take our **decisions with care** – for the environment, for the communities in which we operate and for future generations.



Through **teamwork and open communication**, we create a work environment that embraces different perspectives and encourages our staff to shape the future.

We seize opportunities, take action and adjust quickly, all with an **open mind**. This is how we shape the energy transition with our can-do attitude.



Earning and building trust in all our collaborations: that is our commitment.

We go a step further for our **customers and partners**.

In so doing, we also look to the future. **Society** can count on us for **sustainable, affordable and safe infrastructure**.

3. Applicability of the Ethical Code

The Fluxys Group Ethical Code applies to:

- **all staff members** within the Fluxys Group: persons employed as permanent or temporary employees (e.g., students, trainees, etc.) as well as third parties performing services on Fluxys' premises without having an employment contract with Fluxys;
- **all activities** carried out by or on behalf of entities belonging to the Fluxys Group, i.e. Fluxys SA and companies controlled by Fluxys SA.

By using the name Fluxys, or stating "we", reference is made to all individuals working for or on behalf of any legal entity within the Fluxys Group.

We encourage our customers, suppliers, external service providers, intermediaries, business partners and other individuals or entities associated with Fluxys to apply similar rules as set out in this Ethical Code.

In line with our values, we encourage you to raise any concerns about non-compliance with this Ethical Code. To do so, please contact your manager¹, the Ethics & Compliance Team or the contact person for ethics and compliance matters appointed in each affiliate ("the **Local Ethics SPOC**").



¹ This is your hierarchical superior if you are an employee. If you are a third party performing services on Fluxys' premises, this refers to your Fluxys responsible.

4. Our ethical commitments

We are committed to sustainability, and we also believe we can play an important role in the energy transition and shaping a carbon-neutral future. It is our mission to accelerate the transition to renewable energy and to ensure that we leave a healthy planet behind for future generations. We have made a general commitment to sustainability through our Fluxtainable programme.

4.1. Focusing on the sustainable energy transition

We understand our responsibility to current and future generations in terms of contributing constructively to environmental conservation and protection.

Our business strategy and objectives are therefore determined in accordance with the principles of sustainable development. We apply the highest industrial standards and the most appropriate modern scientific techniques and technologies to limit our ecological footprint. In this way, as a company we contribute to the sustainable energy transition.



4.2. Ensuring safety in operations and in the workplace

Safety is a priority, and we work hard every day to guarantee our commitments. This applies both to our people in the workplace and to the communities in which we operate. After all, safety goes hand in hand with well-being and reliability.

We also ensure that our installations function in the most efficient and safe manner. We do this by monitoring our technical activities and results on a daily basis, assessing our impact on the environment, ensuring the proper division of roles and tasks and communicating about safety issues in a responsive and transparent way.

We expect our people to fully commit to safety every day, as an individual and within the team.

4.3. Ensuring fair business operations

The values of respect, openness and reliability that run through our business operations are supported by an internal regulatory framework. This includes the elements set out below:

Zero tolerance for fraud, bribery and corruption

Fluxys has zero tolerance for any possible form of fraud, bribery or corruption.

Bribery occurs when someone offers an item of value, such as money, to another person to influence that person's decision, or receives or requests such an object in order to influence their own actions. The mere act of offering or demanding is sufficient to constitute bribery, regardless of any action taken by the other party. Corruption is a specific form of bribery in which someone's position and the power that goes with it are abused.

Bribery and corruption can take many forms. They are discussed in greater depth in the *Fluxys Group Anti-Bribery and Anti-Corruption Policy*. A person acting fraudulently is exposed to the risk of criminal sanctions and to the consequences set out in our local company regulations.

When we become aware of violations, we may, where relevant, notify the competent authorities and we will cooperate with any investigations.

A transparent Gifts Policy

Gifts are signs of courtesy. It is a normal part of business and stakeholder relations and is generally permitted, taking into account your function and role, as it can enhance our professional relationships and network.

We want to avoid any form of unlawful influence on business decisions and avoid the impression that anyone has obtained an unauthorized personal benefit. To this end, we apply specific rules and an internal procedure that aims for transparency regarding the giving and receiving of gifts. These can be found in the *Fluxys Group Gifts Policy*.

Transparency about individual interests vs. the company's interests

It can sometimes happen that, as an employee or as a third party providing services to Fluxys, you have private interests that conflict with those of Fluxys. The mere risk that you might appear to favour a personal interest (or that of a friend or family member) is sufficient to constitute a conflict of interest.

Here too, transparency is the order of the day, and you must comply with the procedures set out in the *Fluxys Group Conflict of Interest Policy*. This also applies if you are active politically or in other secondary activities. More information can be found in the *Fluxys Group Conflict of Interest Policy* and its appendices.



Free competition and fair trade

We must all comply with competition law and fair-trade practices and condemn any behaviour or action that violates such legislation or regulations.

We will inform the Fluxys Group staff when we enter a regulated market and ensure that they comply with all applicable rules, such as the codes of conduct of the various regulators.

Preventing market abuse and insider dealing

Insider information is any specific information which has not been officially made public, which relates directly or indirectly to Fluxys Belgium SA, and which - if made public - could have an influence on Fluxys Belgium's stock price. Anyone in possession of insider information is strictly prohibited from trading based on that insider information or from sharing it with third parties, as further set out in the *Fluxys Group Insider Dealing Policy*.

Relations with government agencies

Governments create the framework within which we, together, design our services. We are committed to cooperating with government authorities, including regulators and judicial authorities. We believe it is important to be transparent about our relationships with governments and to base them on integrity and respect for the legal framework. We condemn any form of improper influence or corruption.

A responsible procurement policy

Where we are involved in procurement, we must be particularly vigilant in respecting Fluxys' ethical guidelines.

In particular, we will adhere to the principles of respecting the law, ensuring fair and transparent treatment of suppliers, avoiding conflicts of interest, applying the four-eyes principle, protecting personal data, guaranteeing sustainability and social responsibility, and meeting contractual commitments.

4.4. Actively respecting human rights

We strive to maintain the highest ethical standards which include the Universal Declaration of Human Rights, ILO Conventions and OECD Guidelines.

We are committed to doing everything we can to comply with international standards and obligations on sustainability within our value chain.

Specifically, we focus on:

Respect for human rights in the workplace

Respect for our staff members also means creating a working environment in which people feel safe and are protected from any form of inappropriate behaviour.

Our organisation stands for equal treatment and respect for diversity. We therefore condemn any form of discrimination of any kind whether based on gender, age, nationality, race, ethnicity, ideology, religion, social status, family origin, disease, disability or sexual identity.

We maintain an absolute ban on forced labour, child labour, modern slavery and related forms of unlawful working conditions.



Promoting human rights in our value chain

Our commitment to respect for human rights in the workplace is not limited to our own office environment but extends to our chain of suppliers. We assume our responsibility and actively challenge the parties from whom we purchase goods and services with a view to achieving a sustainable value chain with them that ensures respect for human rights.

Our selection criteria for partners, suppliers, service providers and subcontractors include our commitments on anti-corruption, human rights and environmental protection.

4.5. Being a good neighbour to local communities

Our activities place us at the heart of the communities in which we operate. For that reason, we carefully consider how we wish to interact with those communities.

We pay attention to:

Openness to cultures and customs

We look with an open and curious eye at the history, culture and customs of the communities we come into contact with through our business activities on different continents. We consider diversity as an asset and a source of inspiration. Dialogue is what brings us together and we expect all our staff members to respect the wealth that communities bring to us.



Activities that contribute to local communities

Day in and day out, we commit to our mission of contributing to a sustainable energy landscape. We are proud of our carefully selected partners who allow us to further increase our social contribution through sponsorship and patronage.

Relations with political parties

We do not, as a company, contribute financially to political parties, organisations or campaigns, even in those jurisdictions where this is legally permitted.

4.6. Earning trust through good information and asset management

We earn trust every day by handling the assets and information entrusted to us with due diligence and as a professional. We must be well aware of the need for:

Protecting corporate assets

We are all responsible for protecting the company's assets. We expect every staff member to handle facilities, property, equipment, computer and IT systems, information, funds, etc. with care and to prevent them from being damaged, misused or lost.



Protecting and using intellectual property

Intellectual property created on the work floor belongs to Fluxys. Staff members must therefore inform the company of new creations that give rise to the protection of the rights to those creations.

Just as we treat the intellectual property rights belonging to Fluxys in a respectful manner, we also treat the rights belonging to third parties in the same way. We do not accept any unauthorised use of trademarks, patents and copyrights, studies, projects or publications carried out by third parties.

Properly managing personal data

The personal data of customers, suppliers, staff and other Fluxys stakeholders are treated in accordance with the law and our internal *Data Management Policy*. Every staff member who works with personal data is required to take our internal training courses on the processing of personal data and to handle personal data in a responsible and confidential manner.

Handling trade secrets confidentially

Knowledge and information developed at Fluxys in connection with its activities are considered trade secrets that must be handled carefully and confidentially. This also

applies to information obtained from contracting parties, business partners, customers, etc., which must be treated with the same confidentiality.

You may only use the information you have obtained during your work for Fluxys for the professional purpose within Fluxys for which you obtained it.

5. What we expect from you

We expect you to adhere to the Ethical Code.

Of course, we cannot discuss every sensitive situation that might arise in this Ethical Code. When faced with an ethical issue, **asking yourself the following questions** may help:

- Is this act or decision legal?
- Is it ethical and in accordance with the Ethical Code?
- Does it follow company policies and procedures?
- What risk does it entail and what impact could it have on the company, my colleagues, third parties or me?
- Is there a reputational risk?
- Would I be comfortable if this decision or action was made public?

If you are faced with an **ethical dilemma** or you have **questions** about the right approach to take, then know that you are not alone and talk to someone about it. You can approach:

- your manager;
- the Ethics & Compliance Team or your Local Ethics SPOC;
- where applicable, specific support roles (e.g for Belgium, the appointed "persons of trust").

In addition, the whistleblowing channel is also available: whistleblowing@fluxys.com.

The Ethics & Compliance Team :

- Michiel Dewael (michiel.dewael@fluxys.com)
- Marine Henry (marine.henry@fluxys.com)
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