

ENERGIE STEIERMARK

# Code of Conduct and Ethics

CORPORATE POLICY



ENERGIE STEIERMARK

# Dear Colleagues,

**We believe** that shared values and clear principles are essential to a sustainable energy future and a fair society. As a successful energy provider, we take responsibility for the impact of our actions on the environment and communities.

Our values of fairness, reliability, consideration, cooperation and regional focus ensure that our business operations are seen as having integrity and that our decisions are sustainable. The Energie Steiermark Code of Conduct and Ethics combines our values-based corporate culture with the need for compliance with legislative requirements and social and environmental standards. The principles it sets out provide

an overall framework that is implemented in practical terms through internal guidelines and directives. Energie Steiermark's highest priority is that the conduct of every individual should be irreproachable in legal terms, and that every individual should think and act sustainably.

We take care to ensure that our dealings with our customers demonstrate our reliability as a partner. We also expect our suppliers and business partners to respect and comply with the principles set out in our Code of Conduct and Ethics.

We would like to thank all our employees, suppliers and business partners for their ongoing commitment and dedication.



Dipl.-Ing. Christian Purrer  
Board Spokesperson



Dipl.-Ing.(FH) Mag.(FH) Martin Graf, MBA  
Board Chairman

# Business relationships with integrity



We comply with all laws and regulations.

Integrity is fundamental to our relationships with customers, suppliers and business partners.

We are committed to fair competition.

## 1.1 Anti-corruption

Energie Steiermark does not tolerate bribery or corruption in any form. Employees are prohibited from offering, promising, granting, requesting, accepting pledges of benefits or accepting benefits, where this could create an illegal business advantage or the appearance of influence. Gifts of a size that is typical for social situations or appropriate in the context of standard business practice, and small tokens of low value presented on recognised social occasions are exempt. Energie Steiermark employees must exercise particular caution in respect of presents, business meals and invitations to events. The offering, promising, granting, requesting, acceptance of pledges of benefits or acceptance of any benefit in the form of money or other financial instruments is prohibited.

## 1.2 Conflicts of interest and secondary employment

Energie Steiermark expects its employees to act in accordance with the interests of the company. Staff should not undertake any activities or make any decisions on behalf of the company in order to promote their own interests or the interests of individuals they are linked with, where these conflict with the interests of the company. Actual or potential conflicts of interest should be disclosed to the relevant manager. Employers should be notified of any paid secondary employment or other gainful employment, and may prohibit such activity in the event of any conflict of interest.

## 1.3 Sponsorships and donations

Sponsorships and charitable donations must comply with the relevant legal requirements and internal guidelines. Sponsorship of activities necessitates appropriate and documented communications and marketing services, and activities must be compatible with Energie Steiermark's principles and values.

## 1.4 Fair competition

Energie Steiermark and its employees are committed to fair competition and opposed to anti-competitive practices, in particular agreements on price, capacity, market share or customers in breach of anti-trust law. When participating in associations or having contact with competitors, staff should observe codes of conduct and behave in a manner that is compliant with competition law.

## 1.5 Suppliers and business partners

Fairness and integrity are central to Energie Steiermark's dealings with suppliers and business partners. Energie Steiermark expects its suppliers and business partners to comply with legal requirements (in particular employment, competition, anti-trust and anti-corruption provisions) and ensure their behaviour conforms to the principles set out in the Energie Steiermark Code of Conduct and Ethics. Suppliers and business partners should make appropriate arrangements to ensure that subcontractors also comply with these principles.

# A meticulous approach to information and corporate assets

We safeguard data and information that is entrusted to us.

We take a responsible approach to corporate assets.



## 2.1 Data security and data protection

The security and protection of data is very important to Energie Steiermark. We take all technical and organisational steps to ensure we give data the best possible protection. Energie Steiermark takes the utmost care in its use of personal data and complies with all legal provisions.

## 2.2 Secrecy and confidentiality

During and after their employment at Energie Steiermark, employees are required to treat all information entrusted to them as a result of their employment with the strictest confidentiality. Privileged information may only be disclosed to those employees who require it to perform their duties. Energie Steiermark concludes appropriate confidentiality agreements with its business partners.

## 2.3 Corporate communications

Public statements and communications to the media concerning the interests of Energie Steiermark are issued solely by the Board or by the Communications division on its behalf. If staff are contacted by media or other external bodies for public comment, they should consult the Communications division.

## 2.4 Financial reporting

Energie Steiermark is committed to compliance with the company-specific Austrian Code of Corporate Governance. Financial reporting is undertaken in accordance with local and international accounting standards and the applicable tax law provisions and is a true reflection of the company's assets, financial position and financial performance. Confidential handling of personal and financial data is of particular importance in this context.

## 2.5 Company property

Energie Steiermark employees take an appropriate and prudent approach to company property that is made available to them (e.g. technical and operational equipment, communications facilities).

## 2.6 Equal treatment

Energie Steiermark complies with the rules on non-discrimination and equal treatment of all participants in the market. Network operators who are engaged in work relating to the operation of the network should behave in a manner appropriate to the requirements of the equal treatment programme. This applies in particular to the confidential handling of network operators' and network customers' commercially sensitive data and a non-discriminatory approach to activities undertaken on behalf of network operators.

## 2.7 Energy trading

Energy trading on wholesale markets is subject to strict legal rules in order to increase transparency and thus improve confidence in the energy market. Energie Steiermark supports open and fair competition and is committed to compliance with the relevant legal provisions, in particular to ensure the avoidance of market manipulation, the timely publication of insider information, the reporting of transaction details and the prevention of money laundering.



# Sustainability and social responsibility



We always consider social and environmental factors alongside economic issues.

We treat each other with respect and promote equal opportunities.

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### 3.1 Respect and fair working conditions

Energie Steiermark is guided by international principles (UN Global Compact Principles, Global Reporting Initiative Standards, Sustainable Development Goals). Promotion of human rights, respect for the freedoms of association and assembly, and repudiation of forced and child labour are integral components of Energie Steiermark's corporate responsibility.

Energie Steiermark gives all employees the same opportunities, regardless of age, gender, origin, disability or any other diversity characteristics. Energie Steiermark does not tolerate discrimination of any kind and creates fair working environments characterised by mutual appreciation, openness and tolerance. Great importance is attached to workplace safety and employee health. Compliance with employee protection rules is prioritised, and preventative initiatives promote the health of employees.

### 3.2 Environment and climate

100% of the electricity generated by Energie Steiermark is CO<sub>2</sub> free; as a company, it takes a responsible approach to the environment and is committed to compliance with environmental legislation. The company keeps its impact on the environment and the climate as low as possible by adopting environmentally friendly and resource-saving processes for establishing and operating power generation plants. It promotes energy efficiency initiatives to help customers achieve sustainable reductions in their energy use. Energie Steiermark employees are required to contribute to the protection of the environment and the climate by safeguarding natural resources.

# Implementation of the Code of Conduct and Ethics



We act with integrity and take responsibility for our actions.

We are aware of our status as a role model.

## 4.1 Scope

The Code of Conduct and Ethics applies to all Energie Steiermark employees (including Board members, directors, senior managers and staff, regardless of the nature of their employment).

Energie Steiermark includes Energie Steiermark AG and its subsidiaries (companies in which Energie Steiermark AG directly or indirectly holds the majority of voting rights or over which it in practice exerts a controlling influence as a result of contracts).

In addition, it is in the interest of Energie Steiermark to draw the attention of all other companies (i.e. companies in which Energie Steiermark directly or indirectly holds at least 25 percent of shares and over which it exerts no control) and key business partners to the Code of Conduct and Ethics.

## 4.2 Compliance and responsibility

Energie Steiermark expects the conduct of all its Board members, directors, managers and employees to comply with the Code of Conduct and Ethics. Each employee is individually responsible for complying with and implementing the Code of Conduct and Ethics. Managers are expected to act as role models, to support staff in their dealings with the Code of Conduct and Ethics and introduce appropriate arrangements in their areas of responsibility to ensure that behaviour conforms with the rules.

Board members and directors of foreign subsidiaries of Energie Steiermark AG are responsible for implementing the Code of Conduct and Ethics in their supervisory and management bodies and for ensuring consistency with local legal requirements.

Non-compliance with behavioural requirements may damage the reputation and competitiveness of Energie Steiermark. Misconduct will not be tolerated and where culpability can be established may result in repercussions under employment law. Employees' line managers are available to clarify any questions about the Code of Conduct and Ethics. Staff may also contact the relevant specialist divisions: Legal, Human Resources, Compliance Officers and Compliance Managers. The Code of Conduct and Ethics does not include detailed guidance. Specific requirements and further information are available from the appropriate internal guidelines and operating procedures, and from the e-learning and training programmes.

## 4.3 Reporting misconduct

Employees must initially report breaches or suspected breaches of legal requirements or internal guidelines to their line manager or managers, in order to clarify the working environment in question. If this route is not available, instructions can also be sought from the relevant company directors, the Legal Division manager or the Compliance Management Office.



# Our principles

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We take a responsible approach to corporate assets.

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## Information

Energie Steiermark AG  
Leonhardgürtel 10, 8010 Graz  
Tel. +43 (0) 316 9000-0

[www.e-steiermark.com](http://www.e-steiermark.com)

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