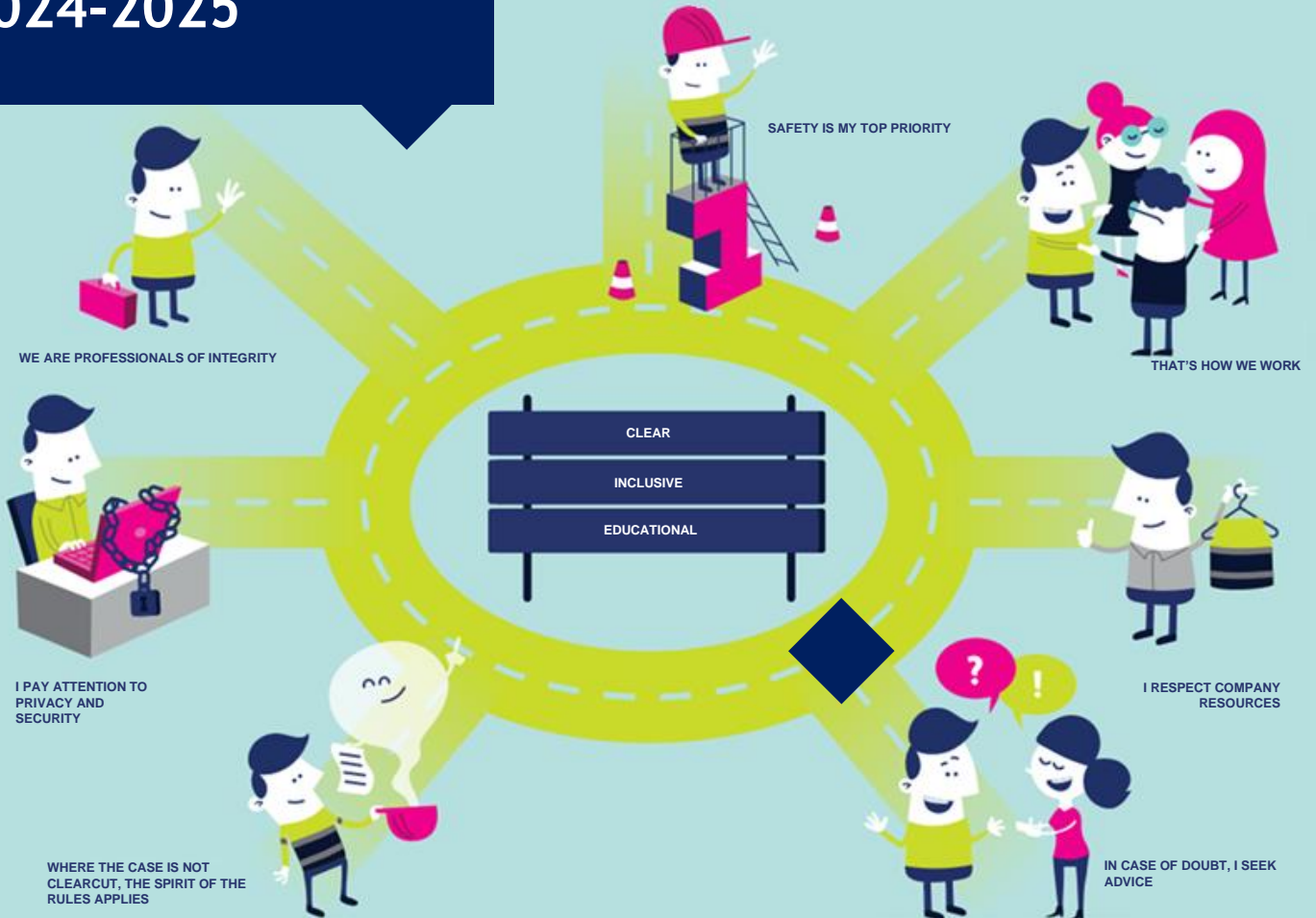


ENEXIS GROUP CODE OF CONDUCT 2024-2025



Enexis Group Code of Conduct 2024-2025

For internal and external employees
Version of 1 januari 2024

CODE OF CONDUCT 2024-2025

FOREWORD FROM THE BOARD



Working together to realise Enexis Group's ambitions: this we can only do if the agreements we make with each other are clear, so that you know what is expected of you and what you in turn can expect of others. This document outlines our standards and values. How we work together and which behaviours are considered desirable and undesirable. By way of concrete examples, we show what is and what is not acceptable.

WHERE DO YOU DRAW THE LINE?

Clear, inclusive and educational - these are our core values. We use these terms to describe our behaviour within Enexis. We encourage colleagues to speak up, to be transparent in relation to that which has been agreed upon even when things are not going well, and to make difficult choices. We draw strength from our diversity and see each other as equal. We clearly state that which we do and do not value, listen to the opinions and ideas of others, and pose open questions. We also endeavour to foster an environment in which you can grow each day and enjoy the learning process, even if you do not know exactly what is going to happen.

It is not always easy to gauge what the right behaviour is in a given situation. That applies to all of us. When we make Board decisions, we often have to contend with competing interests, which we are required to balance well. Our core values and the Code of Conduct help us to do what is morally right.

Enexis considers it important to be clear, and to create an inclusive working environment in which you can learn every day in order that we can together realise better results. Using this joint approach, we can all help to create a working environment in which the right decision is the easiest one we need to make.

This Code of Conduct has been drawn up for all Enexis Group employees, both internally and externally. This has been done in order that everyone knows what our standards and values are in relation to various subjects, and can easily find the corresponding procedures.

This Code of Conduct is not optional. It is important that, at work, everyone is aware of the applicable rules, standards and values, and takes responsibility for these, demonstrating appropriate behaviour.

CONTENTS

1. SAFETY THE TOP PRIORITY	4
1. Enexis Group's safety policy	4
2. Company Emergency Response (EP) and person responsible at the HSE Location	4
3. The Life Saving Rules	5
4. Care for yourself and others	5
5. Safety, health and vitality	6
6. Drive responsibly	6
2. OUR CULTURE	7
1. An Enexis for everyone	7
2. How we view leadership	7
3. How we learn	8
4. Nobody is excluded	8
5. Corporate social responsibility	8
3. YOU AS AN ETHICAL PROFESSIONAL	9
1. Compliance	9
2. How we interact	9
3. Keeping different interests separate	10
4. Submitting claims, ordering and invoicing	12
5. Speak up!	13
4. HOW WE PROTECT OUR PEOPLE, RESOURCES AND INFORMATION	14
1. Personal protection	14
2. Security of buildings	14
3. Handling our company resources	15
1. Laptops and workstations	15
2. Smartphones and tablets	16
3. Private use of IT devices	16
4. Mobility (company van, lease car and public transport) and private use	17
5. Collection / recycling / sustainability	17
4. Protection of information (and information systems) and data (including personal data)	18
1. Digital security	18
2. Use of email and internet (IT)	20
3. Security of Operational Technology (OT)	20
4. Data management	21
5. Privacy	22
6. Handling of confidential information	22
7. Reporting of security or data breaches	23
5. MONITORING, SPECIAL INVESTIGATIONS AND SANCTIONS	24
1. Monitoring	24
2. Special investigations	24
3. Sanctions	25

1. SAFETY THE TOP PRIORITY

We value safety in the workplace most highly. We want everyone to return home in good health every day. That is why safety is always of primary importance to us. Regardless of whether you are at the office, in the field, on the road or at a customer's site.

This principle of mutual care may not be deviated from in any way. Moreover, we do everything we can in order to realise this, our main priority (and that of all of our employees and supervisors and the contractors working for us), on all fronts. Hence our slogan: Safety is my top priority! Returning home safely is something we ensure together.

There are many different dimensions to workplace safety. These include physical and social safety, but also digital security and privacy.

1.1 ENEXIS GROUP'S SAFETY POLICY

Enexis Group's Board of Directors considers itself responsible at all times for Enexis's Safety, Health, Welfare and the Environment (SHWE) policy, and for all employees who work with or for Enexis Group. The implications of this are set out in the [SHWE policy statement](#) which can be found at the [HSE Information Centre](#) on X-net. The policy is aimed at realising the safest possible working environment.

Our ambition is to have zero accidents, because every accident is one too many. This demands a safe environment, in which you as an employee feel free to speak out and to stop working if you cannot carry out your work safely. Supervisors have an important role. They ensure a safe physical, social and digital environment, creating space for open conversations and sufficient time and attention in the team. As an employee and a professional, you take responsibility for observance of the policy. Naturally, you receive all of the means required (including protective equipment) for that purpose. You stop working if necessary and you speak up if you observe an unsafe situation.

IN PRACTICE

A group of colleagues is occupied with shutting off the gas and electricity in a building due for demolition, when a large drill head weighing more than 5 kilos falls only 1 metre away from one of the colleagues. A contractor is working on the 9th floor. The site supervisor responds nonchalantly to the report provided by our colleague, following which the colleagues stop working following consultation with Enexis's site manager. The work is only recommenced once the Municipality has properly marked off and secured the site. We attend to the colleague's aftercare if required.

1.2 COMPANY EMERGENCY RESPONSE (EP) AND PERSON RESPONSIBLE AT THE HSE LOCATION

Know who the [emergency response officer](#) for your workstation is, and memorise the escape routes and alarm number 848 (or 088-8579112 from an external telephone within the Netherlands). Be aware of your own safety, including on occasions when you are working overtime alone, or working in isolation in dangerous circumstances. For more information on what to do after a serious incident or accident, please visit the X-net page [regarding what to do after a traumatic event](#).

Every supervisor is expected to contribute to and take responsibility for a safe working environment. In addition, a specific person is designated responsible for HSE at each location, adopting the "pater familias role" in relation to safety, order, cleanliness, health, discipline and environmental management for the location as a whole. This location-specific responsible person encourages employees present at the location to work in a healthy and safe manner, escalates where requested to do so, and ensures that the company emergency response organisation functions properly. Every employee has a responsibility for ensuring a safe and healthy working environment.

If you encounter unsafe situations which may lead to stumbling and falling, or which result in the obstruction of exit routes or impede urgent response in cases of emergency, resolve it or report it via

FM/ISS or **SAVE** in the Safety Compass. Don't be afraid to call colleagues to account in respect of unsafe behaviour or express concern for their health.

1.3 THE LIFE SAVING RULES

Our work involves life-threatening situations. On the basis of the **Life Saving Rules** and how we apply them, we can prevent people from being seriously injured or worse.

Observe the Life Saving Rules at all times, because even you may find yourself in a situation in which you can prevent yourself or a colleague from suffering a serious accident. If a customer is forced to wait somewhat longer or some working activity takes a little longer, initially, that may not feel good. However, you should never risk your life in such circumstances. Instead, take action, in the form of jointly ensuring that the work is better prepared, and that you know the working methods and are able to stick to these. Put briefly, draw attention to dilemmas and do not allow yourself to be persuaded to undertake unsafe work.

Measures and behaviour together ensure safety. Have an open discussion about this in order to gain insight into where dilemmas lie, where rules present a burden, why it is logical to act otherwise and how the situation in question can best be resolved. In this way, together with your colleagues, you create an environment in which everyone feels secure in bringing up unintended mistakes for discussion, in order to learn from them together. That is what we want, and that way, everyone returns home in one piece.



1.4 CARE FOR YOURSELF AND OTHERS

If you are a supervisor, ensure that employees can work safely. Make time for safety and support each other in safe working choices. Set the standard and demonstrate exemplary safe working behaviour. Deploy employees with the correct training, experience, instructions and contract, including contract workers. Ensure that contracts and work handovers are well prepared. Inform each other of, and intervene in, unsafe situations and activities.

Ensure that your workstation and working environment are safe. The dangers of locations in which work is carried out are often underestimated. In case of minor problems, fleeing or bringing yourself to safety can then become an issue. Apart from the familiar dangers of Electricity and Gas, risks also exist in relation to explosion, fire and hazardous substances/fumes, as well as traffic. Do you have doubts in relation to safety? Stop your working activities, discuss your doubts with your supervisor, and together decide on safe working methods.

Enexis strives to be an organisation in which we can each approach one another, and in turn be approached, in safety. And one in which you can share your mistakes, not least so that others may learn from them. We therefore also expect you to provide notification of situations, for example through **SAVE** (Together Alert to Opportunities for Improvement at Enexis) in the Safety Compass. Subsequently, you may assume that the HSE department and your supervisor will take any notifications you make seriously and deal with them ethically, providing feedback.

1.5 SAFETY, HEALTH AND VITALITY

One of the Life Saving Rules is 'Do not work or drive under the influence of alcohol or drugs'. This means that you may not be 'under the influence' prior to or during working hours (including travel to and from work). Working hours cover all customary working hours, including Outage Standby Duties and on-call shifts.



Do you use medicines which influence your concentration or driving skills? In that case, you must discuss with your supervisor whether your work needs to be modified. Does a suspicion exist that an employee is under the influence of drugs or alcohol at work? Stop working, inform your supervisor and always bring the employee home. In addition, the employee may be requested to undergo a breath or blood test carried out by or through the occupational physician.

No alcohol is served at internal sites. During meetings at external locations outside of working hours organised by Enexis Group, alcohol may be served. However, this will be done with due caution. Alcohol may only be consumed in moderation.

1.6 DRIVE RESPONSIBLY

Another of our Life Saving Rules is 'Drive responsibly'. This rule also applies to making telephone calls while driving. The basic principle is that we keep any distraction while driving to a minimum. This means that calls should not be made while driving. If such calling proves necessary, then this must obviously be done using hands-free technology.



There is also a limit: we do not use smartphones, tablets, laptops or navigation systems while driving. And we do not participate in conference and/or video calls while driving. Even if you are only participating as a listener. This applies to everybody who performs work for the Enexis Group.

Where possible, we park in reverse. This makes subsequent departure safer.

IN PRACTICE

An employee is attending a meeting via Teams when, at a certain moment, she discovers that one of her colleagues is calling in from a car. She immediately asks this colleague to leave the meeting and rejoin once she is safely parked somewhere. Her colleagues are pleased that she mentioned this and that the colleague has received the feedback openly.

[TO THE TABLE OF CONTENTS >](#)

2. OUR CULTURE

2.1 AN ENEXIS FOR EVERYONE

Together with all of our colleagues, we are working towards the realisation of Enexis Group's mission: We bring increasing amounts of sustainable energy to people. We do that by contributing to the direction of the energy system of the future, and by smart investment in reliable energy infrastructure. In this way, we will keep the energy transition affordable and within our grasp. In order to continue doing our work well in the future, we are working in this context on a culture in which we mutually reinforce one another through clear communication and continual learning.

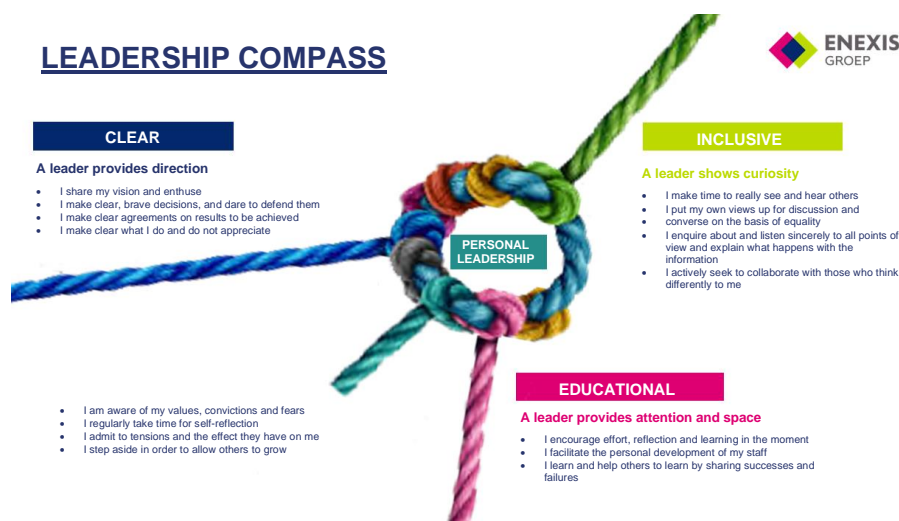
We do this by:

- Building towards a transparent and inclusive culture in which we clearly express expectations and meet them in a timely manner, while actively teasing out diversity of opinion and background and learning from differences in order to strengthen our problem-solving capacity.
- Taking on and training enough people, and enabling such people to progress through the organisation, in order that the demands of the work can be met, with the right mix of experienced employees and diverse, new talent.
- Encouraging every employee to learn, grow and improve results continually. Not only where the work itself is concerned, but also in taking the digital opportunities presented.

Together with all of our colleagues and supported by HR specialists, we work towards developing our behaviour as individuals and as a team.

2.2 HOW WE VIEW LEADERSHIP

Cultures make people, people make cultures. This means that everyone has an influence on the culture and leadership we stand for. We can no longer always fall back on our trusted approach. Leadership in a complex world is aimed at limiting all relations and communication lacking in variation and freedom. Therefore, leaders must also first work on their own understanding and consciousness (strong personal leadership), as you cannot lead people to places you yourself have not been before. No new rules or procedures, but a compass. It indicates the direction, but is not a map. Together, we bring the map alive, and in this way we strengthen each other and our core values of being Clear, Inclusive and Educational.



2.3 HOW WE LEARN

Within Enexis Group, we learn in three ways. Perhaps your initial idea of learning is learning in a formal sense: you learn via training programmes, activities or courses. However, we go much further. That is to say, it is also possible to learn from others, for example through peer supervision. And you can learn by doing: through practice, during your daily work. It is to the latter that we pay the most attention. We call this 70-20-10 learning: 70% practical, 20% peer-to-peer, 10% through formal learning.

We set great store by a safe (just & fair) learning environment, through which colleagues have the space to really learn from each other. All programmes are requested via learning platform Leerplein, and this applies both to internal Enexis Training and Courses (ET&O) training activities and to the external training activities procured by ET&O for the organisation (Archipel). You can find more information on this on the [ET&O Information Centre](#) pages.

2.4 NOBODY IS EXCLUDED

We at Enexis Group subscribe to the Universal Declaration of Human Rights. This states that all human beings are born free and equal in dignity and rights. This applies without distinction, regardless of sexual orientation, skin colour, gender, religion, political or other convictions, nationality or social background. Where Enexis Group is concerned, this means that we treat each other, our customers and everyone with whom we collaborate as equals, and with respect.

IN PRACTICE

A supervisor has recently taken on a number of new colleagues with different backgrounds. This has increased the team's diversity. He finds it important that everyone feels at home. Therefore, he organises a session on how to deal with the differences between people. Together, they discuss how the team can best take advantage of the differences.

2.5 CORPORATE SOCIAL RESPONSIBILITY (CSR)

As a company with a social function, Enexis works to increase sustainable energy provision and is committed to the goals of the Climate Agreement. In addition, we take our responsibility in increasing the sustainability of our business operations. Through our daily work and our CSR ambitions and results, we contribute to the United Nations' worldwide Sustainable Development Goals. Do you want to know how you can contribute to this? Then read more on the [CSR page on X-net](#) or read the [CSR policy statement](#).

[TO THE TABLE OF CONTENTS >](#)

3. YOU AS AN ETHICAL PROFESSIONAL

Behaving ethically means taking standards and values into account, even where these are under pressure. In addition, you make allowance for different opinions in this regard. This concerns your own values, such as being honest or arriving on time, as well as those of Enexis Group, such as the core values of being Clear, Inclusive and Educational.

3.1 COMPLIANCE

When we refer to standards, we are referring to all valid rules such as legislation, company schemes, policy and the rules described in this Code of Conduct. Compliance is defined as your compliance with the rules which we as an organisation wish to and are obliged to comply with. Increasingly often, we as an organisation are required to be demonstratively compliant. You can contribute to this by following and keeping up-to-date with developments concerning the internal and external regulations relevant in and to your work through, for example, a [toolbox](#) in the direct employee consultation or information meetings.

The laws we must comply with include the Electricity Act, the Gas Act and the Working Conditions Act. The external regulations most relevant to Enexis may be found in the Relevant Regulations Register (the 3R Register). You can consult this register at the [Corporate and Legal Affairs \(CLA\) Information Centre](#).

An example which follows from this statutory standard is that, as a network manager, we are obliged to prevent discrimination in the implementation of statutory tasks and powers. There are also rules pertaining to the handling of privacy-sensitive information and information through which companies may potentially gain a competitive advantage. Agreements on this are set out in the [Compliance Protocol](#).

3.2 HOW WE INTERACT

The fundamental aim here is that we engage one another - and the Enexis Group as a company - respectfully and with pleasure. We find it hugely important that the working environment be inspirational, pleasant and safe. That is also why we speak TO each other and not ABOUT each other.

If you are a supervisor, you should realise that your behaviour - and its exemplarity or lack thereof - is important to your employees, and is 'seen'. You set an example for them to follow. You are also responsible for taking action if an unsafe situation arises (this also applies to social safety) and making this open to discussion. You can request support on this from your own supervisor or from the HR Advice Desk.

You are our calling card

Regardless of your position, department or even your working hours, you treat colleagues with respect and observe both written and unwritten rules. As an Enexis employee, that is simply what you do. Both in the office and on the road. In direct collaboration, towards customers and on [social media](#). Whenever you are identifiable as an Enexis employee, remember that you are our company's calling card. This is obviously the case whenever you drive an Enexis van or wear Enexis company clothing. However, it also applies to social media, for example.

With social media, there is often no distinction between personal and business use. You are always also an Enexis employee. Your posts may therefore affect your good name and that of Enexis. We encourage you to use social media. And to share your experiences of working at Enexis when doing so. As long as you demonstrate awareness at the same time.

You cannot simply take photographs or make videos within Enexis and share these on social media. Each of us must take the privacy of our colleagues into account, as well as the safety and security of our energy network. You can read more on the exact details of how we do this and what we have agreed in this regard on the [HS/MS station image recordings factsheet](#).

Contacts with the press

Enexis employs spokespersons in its Communications Department to communicate with the media. Our [policy](#) is that they coordinate all questions. Among other things, they critically analyse what we

want to say and how this comes across. Should you be approached by the press, please contact Media Relations via 0900-0310 (in the Netherlands) and do not be tempted to provide answers yourself.

Unacceptable behaviour

Some people face reluctance in going to work out of fear of a certain colleague or supervisor. This may be because they are being bullied, discriminated against, physically threatened or intimidated sexually or otherwise. Though you might like to think that this sort of thing doesn't happen, unfortunately it does.

Enexis takes this very seriously, and as an employer, is obliged to do something about it. We do not accept these kinds of undesirable interpersonal behaviours. For these reasons, we have a [complaints procedure](#). And that is why we are investing time and effort in the prevention of bullying, for example. We have a page on [psychosocial work stress](#) at which you can also find a toolbox in relation to this subject.

IN PRACTICE

An employee works in a department which has a good work atmosphere. However, regularly made comments and jokes regarding sexual orientation irritate her. She has the feeling that a number of colleagues make such jokes particularly when a certain colleague is present. She decides to bring up the matter with the colleague in question. This colleague indicates that he does indeed find the jokes and comments offensive, and he is pleased that his colleague has broached the subject. Because the colleague in question is shy of discussing the matter further directly with the other colleagues, the two of them approach their supervisor. During their discussion, it is agreed that the presentation "Talking about ... Bullying" be put on the agenda at the subsequent direct employee

3.3 KEEPING DIFFERENT INTERESTS SEPARATE

During your work, you may encounter a variety of - sometimes contrary - interests. We wish to avoid conflicts of interest, or any appearance thereof. Therefore, we are providing guidelines for dealing with such conflicts in various situations.

Outside activities

It may be the case that, apart from your work at Enexis Group, you have, or wish to perform, other work. In principle, we view this positively. [Outside activities](#) can provide a valuable corollary to your daily activities and personal development.

IN PRACTICE

Apart from his work as an Enexis site manager, an employee has his own small app development business. He has discussed this with his supervisor. Together, they have made agreements in relation hereto. They have entered these on a form and had them added to his personnel file. Naturally, the employee does not use an Enexis laptop for the purposes of his own small business. Such laptops are not intended for this purpose.

If your supervisor agrees to it, you make agreements together and set them out in writing in your personnel file. You can find a [form](#) for this in the HR Information Centre, under 'outside activities'. Should the outside activities or your own work change, consider jointly with your supervisor whether the agreements made are still appropriate and make new ones where necessary.

In principle, Enexis will not hire in any colleagues via their own companies for specific work. That, too, is a form of conflict of interests.

IN PRACTICE

A colleague works in the IT department as an architect. She has used her sustainable employability budget to complete a coaching programme and now has her own coaching practice aside from her work for Enexis. A colleague from another team has asked her to coach him, because he has difficulty balancing his work with his private life. She informs him that, unfortunately, this is not possible, and lets him know that he can request a coach via the Leerplein learning platform.

External contacts and acceptance of gifts

We use the following basic principles in our dealings with external parties, such as suppliers (e.g. contractors), governments, authorities, customers and interest groups:

- Avoid (undue) influencing or the appearance thereof. The acceptance of any business gift that might lead to the favouring of an external client is not permitted. You must also avoid even the appearance of (undue) influence.
- Avoid dependence, or the appearance thereof. This applies in particular to external parties who are involved in acquisitions, or invitations to tender, made by Enexis.

Do you occasionally receive gifts from external contacts? If so, please ensure that the value of the gift and the relationship with the external party in question are proportionate. You are entitled to accept a gift from an external party once per year to the value of up to €50. You may not accept gifts from external parties who are involved in acquisitions or invitations to tender made by Enexis Group. In case of doubt, consult your supervisor.

IN PRACTICE

Each year, at around Christmas, an employee receives gifts from various suppliers, such as bottles of wine. She is entitled to accept such gifts. However, if the value of each gift is likely to be more than €50, she politely refuses. If she receives gifts from the same contacts several times a year, it is highly likely that the total value of such gifts will at a certain point exceed €50. In such situations, as you can imagine, it might be assumed that the relationship is one of dependence.

Apart from gifts, it may also be the case that a supplier invites you to an event. Consider any such invitation carefully before accepting it. At the very least, the relation must be an existing client of Enexis Group with whom you have contact as a consequence of your role. Always discuss such invitations with your supervisor, particularly in case of events abroad or repeated invitations from the same party, and make a record of the events. In principle, we always refuse invitations to multi-day events. You can find an [example letter](#) on X-net which may be used to politely refuse an invitation to an event.

Should you accept an invitation, please also inform the Procurement department by sending an email to the purchaser who supports your department. On the basis of further details, this department can evaluate whether or not a given supplier exercises too much influence on others.

IN PRACTICE

An Enexis employee's external contact invites him to a meeting in Rotterdam, including a tour of the port of Rotterdam, an overnight stay in a luxury hotel with a 3-course dinner and a tour of the steamship Rotterdam the following day. Our employee does not accept the invitation.

Workplace relations

In companies like ours, there are many connections between colleagues (some of which are familial). We also encourage family members and friends to apply for positions within Enexis. However, conflicts of interests should be avoided, for example by not hiring in or awarding contracts to friends or family members. Always ensure that these kinds of things are transparent and discuss selections with your supervisor, documenting what has been agreed. In this way, you avoid any appearance of conflict of interest while also preventing workplace relationships from having negative consequences for colleagues.

It may of course also be the case that a relationship arises in a team, or that you become a member of the same team as someone you are in a relationship with due to changes. That is not always desirable for the team in question. Where the people involved have different levels of seniority (for example, an employee and a supervisor or senior employee), a solution is sought that is agreeable to all.

3.4 SUBMITTING CLAIMS, ORDERING AND INVOICING

Expense claims

Enexis Group operates several different schemes under which you can [claim](#) expenses. Each type of expense claim has conditions which it is important to be familiar with. These conditions relate to, among other things, the tax rules with which we as a company must comply, and our company rules. The basic principle is that you pay business expenses of up to EUR 250 yourself in advance, submitting your claim retrospectively. You also pay the expenses of any anniversary celebrations in advance yourself. HR reimburses such expense claims as quickly as possible. For everything else, you can make use of the order process.

Ordering and invoicing

In order to keep administrative costs to a minimum, it is customary to use as many different existing suppliers as possible. To do so, you make use of the order catalogues, or you have an ATB purchase order created in SAP on the basis of a requested quotation. The supplier then receives the formal purchase order, along with instructions for submitting the invoice. Without a purchase order, no supplier can send Enexis an invoice.

Gifts for your own colleagues or external clients, such as flowers, cakes or baskets of fruit, may be ordered from the catalogue. Ordering is simply a question of common sense. It is not the case that everything contained in the catalogue may be ordered unreservedly. Make clear agreements with your supervisor about this in advance, in order to avoid the appearance of abusing the system.

Budget holders

A budget holder is a colleague who is responsible for the correct disbursement of a fixed budget. There are [rules of conduct](#) for budget holders which help to determine the correct means of disbursement in advance. This process involves three steps: stating, discussing and describing. This point of reference makes it easier to avoid the appearance of improper use of authorisations.

State: Tell your supervisor what you notice or what you have questions about:

- Am I entitled to do such-and-such a training course abroad?
- Can we organise this workshop for the department?
- Can we organise 'a little something extra' for the employees?
- Can I contract a supplier with whom I have a personal relationship?

Discuss: Discuss and make clear agreements with your immediate supervisor:

- Make clear agreements with your immediate superior. In doing so, consider the way in which that agreed upon will be viewed both inside and outside of Enexis Group.

- Where relevant, consult other concerned parties, such as HR: ‘a little something extra’ for employees may fall under the work-related expenses scheme, as a result of which it has an impact on the organisation.

Describe: Set out in writing that which you have mutually agreed:

- Apply the ‘four eyes principle’, and make a record of this (for example, via a formal ATB purchase order, or an email to your supervisor where an ATB is not possible).

Speak up!

We believe a safe and pleasant working environment and an ethical and professional working mode to be very important. This also includes discussing those things which do not turn out as desired. With our ‘[Speak up!](#)’ messaging, we encourage all Enexis employees to do exactly that. Even when it is difficult to do so.



The first step is to enter into discussion, with (the help of) your supervisor (or with your supervisor’s assistance). If you cannot resolve the matter between you, enter into discussion with a senior supervisor. In most cases, that results in a good outcome for all involved. However, that is not always the case. Where that is so, there are a number of schemes available and there are confidential advisors who can support you or refer you elsewhere.

Appeals

Bringing cases up for discussion and calling each other to account also means providing employees with the opportunity to raise objections to decisions which seriously affect or damage them personally. The [General Complaints Regulation \(Company Scheme 20\) \(in Dutch\)](#) is intended for this purpose. If, for example, you do not agree with an evaluation or with another decision made by your supervisor, you can appeal. Appeals always begin with your own supervisor and the supervisor ranking one place above your supervisor in seniority. If these discussions fail to lead to the resolution of your objection, you may subsequently appeal to the independent Complaints Committee.

Complaints

In case of sexual harassment, aggression, bullying, violence or discrimination, it is important to enter into and continue discussion of this. Confidential advisors can help you with this. Information regarding such confidential advisors and on who you can approach is available on X-net, on the page [Company scheme 15 ‘Complaints procedure for sexual harassment, aggression, bullying, violence or discrimination’](#).

Mediation can be a good aid in discussing your complaint and jointly reaching an outcome. Your confidential advisor knows which mediators we have had good experiences with, but you can also choose a mediator yourself. Where this possibility is not - or is no longer - possible and you have the feeling that Enexis Group is not doing enough to support you with your complaint, you can submit your complaint to the independent complaints commission. The confidential advisor can also help you further with this.

Reporting

Reports on the basis of [Company scheme 19 Reporting of alleged abuses and irregularities](#) are aimed at informing those who can take action of such suspicions. Examples of this are suspected abuses whereby the social interest is at stake, or an abuse within Enexis which comes to light.

An absolute requirement for reporting suspected abuses is that there be an easily accessible point for safe and confidential reporting. At Enexis Group, apart from your own supervisor, you can also draw on one of the [confidential advisors](#) or the [100% anonymous hotline](#). Reports are handled in strict confidence and with due care. [Use this link](#) if you wish to email your report, or call 0800-02 02 007 (within the Netherlands). To log in, use code 98194.

4. THIS IS HOW WE PROTECT OUR PEOPLE, RESOURCES AND INFORMATION

Handling resources and information safely and ethically. Though it may sound easy, a number of aspects are involved. In this chapter, we zoom in on personal protection, building safety, the handling of company resources and the protection of information and data. We handle company information confidentially, and act with due care in respect of privacy.

4.1 PERSONAL PROTECTION

In some cases, you may face aggression, violence or undesirable behaviour. If that applies to you, we as your employer invest a good deal of energy into carefully preparing you for it. Think in terms of training activities, toolboxes, dog training for technicians, etc. In situations in which our employees are being threatened, following consultation with those concerned, we report incidents to the police and attend to protection, assistance and aftercare. For more information on the protection of our employees, please visit the "[Aggression and violence](#)" page at the HSE Information Centre.

But that is not all we do within Enexis. We also have made a number of agreements with each other in order to exclude risk to the greatest possible extent. One of these is that work is to be carried out by at least two people in situations where customers may be aggressive. Another is an emergency button under the reception desk at all locations. And we consciously choose whether or not to put logos on company cars.

Naturally, we also take preventative measures. For example, all required and obligatory Personal Protective Equipment (PPE) is available. Even if you are an office worker who only occasionally works in the field. No matter how many training activities we provide and preventative measures we take, you yourself are ultimately responsible for using these and applying them in real situations.

4.2 SECURITY OF BUILDINGS

Our buildings are secured. Only colleagues holding a valid access pass may access our locations. You must display this pass visibly on your clothing, so that everyone can immediately see that you are entitled to access the site in question, and that you are a colleague. Each pass is personal and therefore may not be loaned. Have you lost your pass? Please inform the [FM Service Desk](#) of this immediately, so that the pass can be blocked and unauthorised access to our buildings can be prevented.

Office buildings and other Enexis Group locations may be secured using camera monitoring. In connection with privacy, we naturally take due care in relation to the storage, provision and viewing of these camera images. Where locations are equipped with camera monitoring, small signs will be present indicating this, and there is also a [camera policy](#) available. In addition, the [Employee Privacy Statement](#) describes how we deal with these camera images.

Visitors

Are you receiving a visitor? Please always report this in accordance with the applicable regulations, via [FMonline](#), so that we know who is in our buildings. As befits a good host or hostess, you will receive any visitors from reception personally, and escort them back there at the end of their visit. This is not purely a matter of hospitality. It is also a contribution to creating a safe working environment. Have you seen a stranger wandering around in the building? Ask that person if you can help them, and escort them to the reception.

Has the evacuation signal gone off? Then bring your visitor to the assembly point and await further instructions together with them.

IN PRACTICE

An employee is behind the reception desk when a visitor reports that he is a contact person of Karel. Karel is always very meticulous about the registration of his visitors. The employee is not entirely convinced, and telephones Karel. Karel says that he is off work, and that he has not made any appointments. The employee informs the visitor of this, following which the man becomes very angry. It turns out to be an angry customer seeking redress from Karel.

4.3 HANDLING OUR COMPANY RESOURCES

All kinds of company resources are made available at Enexis, for example company clothing, company cars, tools, home workstation furniture, seals, sealing pliers, keys, applications, telephones and laptops. But also financial resources such as fuel cards, mobility cards and credit cards. The resources you are provided with depend on your position and working activities. It goes without saying that you are to handle such resources as though they were your own, i.e. with due care.

There are a number of company resources regarding which it is also important that these be utilised, maintained and returned correctly. If, for example, laptops, telephones, seals, sealing pliers or company clothing end up in the wrong hands, this may have significant repercussions. Therefore, you must ensure that you know what is expected of you. Your supervisor can provide you with more information on this.

Do you want to know how we handle company resources with due care and responsibility at Enexis? The toolbox [Handling company resources with due care](#) provides a number of pointers for using our company resources.

IN PRACTICE

The fraud prevention department receives a telephone call from the police. Enexis Netbeheer work clothing has been found at a pot farm. An internal investigation indicates that the clothing originates with an employee. The employee is alarmed when he hears that he is being investigated for involvement in the pot farm. He says that his Enexis jacket was stolen from his company vehicle two months earlier while, during lunch, he forgot to lock his car. He did not inform his supervisor of this because he was embarrassed about his forgetfulness.

4.3.1 LAPTOPS AND WORKSTATIONS

The laptop provided to you by Enexis has been given to you so that you can perform your work [ergonomically](#) where necessary. The laptop is therefore also equivalent to an office workstation, with the same conditions attached. A laptop or workstation provides access to Enexis information and data. In order to handle this as well as possible, a number of rules have been drawn up with regard to laptop and workstation use.

- You must not leave the laptop behind in the car, even if you are able to place it out of sight. If it is unavoidable due to your work, switch it off (don't leave it on standby!) and arrange together with your supervisor for a safe or lock in the car.
- Loss or theft must be reported immediately to the IT department (via +31 (0)88-857 4444). Cases of theft must be reported to the police, whether you are in the Netherlands or abroad.
- If you have an OT workstation, you may only use it for OT work, for example the modification of devices in stations.

- A laptop or workstation is entrusted to you (in your capacity as an Enexis employee) and the intention is therefore that you alone will use it.
- Hacking, the downloading and uploading of films or illegal software, the distribution of illegal material and the unauthorised distribution of confidential company information via your laptop is prohibited.
- Any modification to the settings of the laptop/workstation or software installation is always carried out by or through the IT Service Desk.
- You may not modify, bypass or turn off the laptop's security settings or software yourself.
- Files which are private may be saved in a folder named 'Personal' or 'Private'. This also applies to email, for which a similar folder may be created in the mailbox.

Smartphones and tablets

The aforementioned rules also apply to the smartphone and/or tablet you have been provided with. However, there are also a number of specific rules for these devices.

- You may also use the smartphone or tablet Enexis provides you with for private purposes. Nonetheless, the smartphone/tablet is primarily to be used for work. For this reason there are some limitations in respect of private use, in order to safeguard the security of our systems.
- The Enexis smartphone/tablet is under Enexis's management, as described in [Company Scheme 4 Smartphone Scheme](#). The downloading of apps is permitted, provided these are from the Google Play Store or the Apple App Store.
- You may not turn off the security on any Enexis telephone or install apps from untrustworthy non-Store sources.
- The smartphone is assigned to you personally, in your capacity as an Enexis employee. It is not the intention that others should use it on a regular basis.

4.3.2 PRIVATE USE OF IT DEVICES

When you are lent a smartphone, tablet or laptop (i.e. a device) by Enexis for use in the implementation of your work, this is because Enexis wants you as an employee to be able to carry out your work as well as possible, and to have as much freedom as possible in doing so. This freedom also includes your being able to use your device(s) privately, because your work and private life may sometimes become intertwined.

However, it is important that you keep in mind that you have been lent the equipment for use, and that it must be treated as a company resource. Every company resource provides access of a certain kind to information about Enexis or its customers, and we must handle such information with due care.

Normal private use includes:

- The streaming of a series or film on e.g. Netflix, Disney+, etc. (though only via a private Wi-Fi connection).
- Surfing the internet for daily use.
- The use, processing or creation of Office 365 documents (e.g. Word, PowerPoint, Excel) for private purposes.
- The submission of e.g. your tax returns or the payment of your bills.

You can find more information about this at [Guidelines on the private use of IT resources](#).

4.3.3 MOBILITY (COMPANY VAN, LEASE CAR AND PUBLIC TRANSPORT) AND PRIVATE USE

If you are provided with a company or lease car for your work, various rules apply to the private use thereof. An overview of these is provided below. In addition, you may use public transport for commuting to and from work and business travel. Private use of the mobility card is not permitted, and abuse of this is considered theft. Should you nonetheless have found yourself using your card for private purposes, discuss with your supervisor how such costs can be most easily compensated.

Resource	Private use	Agreements / particulars
Lease car / company car plus	At your discretion	If you decide to use a lease car privately, you pay the additional tax liability for this private use and, where applicable, your personal contribution.
Company van	No	<ul style="list-style-type: none"> ▪ You request a 'Statement of no private use of company car' from the Tax and Customs Administration. You agree to the conditions of the Tax and Customs Administration and therewith accept all consequences of failure to comply with this Statement. The Tax and Customs Administration verifies this and, in case of suspicion of breach, requests information from you directly. ▪ Enexis is obliged to report any suspicion of private use to the Tax and Customs Administration.
Fuel card	No	<ul style="list-style-type: none"> ▪ Only to be used for the car/van to which the card is linked. Or for the replacement car, where your lease car is not available due to repair or maintenance. ▪ Conspicuous consumption is monitored. ▪ Abuse is considered theft.
Mobility card	No	<ul style="list-style-type: none"> ▪ 1st class travel with public transport is standard ▪ All employees with Enexis employment contracts may request mobility cards. ▪ Conspicuous consumption is monitored. ▪ Abuse is considered theft.

4.3.4 COLLECTION / RECYCLING / SUSTAINABILITY

Where materials Enexis no longer needs are concerned, there is a focus on reuse or recycling of these, or on making a sustainable impact with them in another way. The material disposed of in containers is the property of Enexis, and you the employee may not remove it for your own use. Think for example of cables which have come back from the field. It is possible to receive money for cables due to the copper and aluminium they contain.

For this reason, all materials are collected by Enexis via [the recycling centres](#) and sold via our waste processor. In contrast, the disposal of household waste generally involves a charge. For this reason, we separate waste as much as possible when collecting it at our offices. This is also good for the environment and our CO2 footprint.

4.4 PROTECTION OF INFORMATION (AND INFORMATION SYSTEMS) AND DATA (INCLUDING PERSONAL DATA)

4.4.1 DIGITAL SECURITY

We at Enexis Group protect our information (and information systems) and data (including personal data) well. In order to safeguard digital security, we at Enexis Group are active on many fronts.

Behind the scenes, a variety of measures are being taken to guarantee our digital security, with colleagues working on this daily. These are measures which, generally speaking, you probably do not notice in your day-to-day working practice, but which actually protect both you and the organisation. For example, all new equipment is tested comprehensively, our specialists continually monitor the IT networks and we regularly carry out hacking tests.

In order to safeguard our digital security both now and in the future, Enexis Group works intensively together with the government, companies and other network managers. We are a member of the National Cyber Security Centre (NCSC) and the European Network for Cyber Security (ENCS), as well as various other knowledge organisations.

Apart from the aforementioned measures, we consider it important that our employees be made aware of the risks of using the internet and email, and of working with confidential information. But also of what our customers can expect from us in terms of our safeguarding of our customers' and employees' privacy.

You can find more information on this at [Digital Security and Privacy Information Centre](#).



4.4.2 USE OF EMAIL AND INTERNET (IT)

We cannot work without email. Your Enexis email address is a business email address which you must not use for private purposes. A [standard signature is available](#) for the signature of your email messages.

There are also limits. The unauthorised or unsecured sending of company information via email is not permitted. Be aware of what you send to external parties via email. In most cases, email is an unsecure form of communication. The conscious distribution of undesirable emails (SPAM), phishing emails, viruses, hacking tools and illegal content is obviously not allowed. You can find more information about this by visiting the [Digital Security and Privacy Information Centre](#) or by contacting one of our [Security Officers](#).

Using your smartphone you can gain access via the company portal to Enexis email and apps, where these are administrated by the IT department. In order to be able to use the company portal, several

aspects of your smartphone security are checked regularly. Where there is reason to do so, the smartphone may be wiped clean of data remotely, for example in case of theft.

Apps

Private use of apps such as WhatsApp, Facebook and Instagram is allowed on smartphones provided by Enexis. Please be aware that you may not use such apps to share business information. Be careful when installing apps not related to business, as these may contain security leaks and, in many cases, have access to private and business data. Due to security concerns, you may not install or use TikTok on your Enexis smartphone.

Under no circumstances is the installation of illegally sourced apps which modify the smartphone's software in order that free 'paid' apps may be installed permitted. Enexis Group can check compliance with this.

Photographs, videos and music

Saving photographs, videos or music files on your laptop is only permitted where your job demands it. Such files make great demands on the storage capacity of the IT system. Not only on the computer itself, but Enexis's network is also contaminated and slowed down as a result.

Moreover, it is not permitted to download or save films or series on any Enexis laptop or the network. Additionally, please bear in mind that photographs, videos and music may be copyright protected.

IN PRACTICE

A number of colleagues regularly send one another emails containing, for example, funny photos and videos. They save such videos on their Enexis laptops. They thereby unintentionally slow down the network, and they may expose the network to computer viruses.

When such is the case, you may not use such files unreservedly in presentations or on webpages, for example. If you do so, claims on the part of the author may be expected as a consequence.

Use of the internet

The internet is intended for business use, though you may also make searches or handle other private matters online during working hours. The rule here is that such private use must be moderate, and may not present an obstacle to your business activities.

A number of things are simply prohibited. For example, you may not visit any websites containing pornographic, racist, discriminatory, abusive or offensive material. Many of these websites are blocked, and attempts to access them are monitored. You are also not entitled to download any illegal software, or install software which may bypass or influence the security of your Enexis computer or the IT network. Software may only be used in line with the conditions applicable thereto. Incidents involving viruses, malware, etc. must be reported immediately to the IT department via telephone number +31 (0)88-857 44 44 or security@enexis.nl.

IN PRACTICE

During his lunchbreak, a colleague is navigating on Facebook, when by accident, he clicks on an advert which leads him to a site containing pornographic material. This is not what he is looking for, and he closes the browser tab immediately. In shock, he asks himself whether his visit to this site is likely to lead to his supervisor's questioning him about it.

You are not permitted to visit sites containing pornography or which are otherwise offensive using your Enexis laptop or smartphone. If it happens once by accident, that is not necessarily a problem. If there is reason to do so, Enexis can check whether you have visited unauthorised sites. This can be done, for example, by means of a special investigation.

4.4.3 SECURITY OF OPERATIONAL TECHNOLOGY (OT)

In order to manage our energy network various digital systems, which are also referred to as Operational Technology (OT), are used. These are especially well-secured because, being accessible to third parties, if disrupted, the Netherlands' entire energy network may be affected, with large-scale power failure being the potential result.

Changes to OT systems are implemented and the energy network managed via OT laptops (or workstations). It is therefore of great importance that OT laptops are well-secured, in order to minimise the chance that malicious actors gain control over our energy network. Therefore, OT laptops may only be used for the OT network. Standard Enexis (IT) workstations may never be used for working on the OT network.

4.4.4 DATA MANAGEMENT

Good data is of considerable importance to the Enexis Group. Because we deploy data on a larger scale and utilise new data sources, we are in a position to extract more value from data. That is why we want to look after it as much as we do our company resources.

We at Enexis need to be able to depend on our data

Our data quality needs to be in order. Each of us carries out some kind of data-related task: we enter it, collect it, use it, share it, archive it and delete it. When you enter data incorrectly, that incorrect data gets copied. Incorrect, incomplete, unupdated or inconsistent data leads to wrong decisions being made. What you do with data influences how your colleagues can subsequently use it. Data which you process can also be used in processes and systems elsewhere. Put briefly, sensible data use is important.

IN PRACTICE

A customer has completed the Failures Compensation Form on our website. This form comes in to the Consumer department via the STAP app. There, it transpires that the house number entered is not present in X-viewer or the Data Infra Compensation tool. Because the data does not match, employees in the Consumer department must carry out an additional check to ensure that the right customer receives the compensation within the statutory period.

Because this happens regularly, the department's team manager holds discussions with the Failures Process Manager in the Operations department to see how we can avoid lacking data in the future. They report the data quality issue in ServiceNow.

Working with data

By using data sensibly, you contribute to good, trustworthy data. In this way, you also contribute to correct decisions and safe working, and more can be done with the data. We apply the following three principles for sensible data use:

1. Enter data in the system correctly, completely and in a timely manner, in a single session.
2. Take due care of your own data, such as files and photographs.
3. If you see that something is not right with the data, act, i.e. correct it immediately or report it.

Data ethics

In case of new possibilities for using our data (including technical possibilities), we aim to ensure that there is no undesirable, unexpected or underestimated impact on people. A conscious consideration of various interests is required with regard to what we want done with our data. We call this data ethics. You can find out more on the [data ethics site](#).

One of the new technical possibilities is the use of artificial intelligence (AI), such as for example ChatGPT. To use AI in a safe and responsible manner there are certain things you should pay attention to. You can read more here in the Factsheet Working with [Artificial Intelligence](#).

4.4.5 PRIVACY

Enexis Group requires the personal data of customers and employees in order to provide its services. Our customers, you and your colleagues depend on Enexis's being a trustworthy company at which your data is in good hands. The General Data Protection Regulation (GDPR) sets strict requirements with regard to how organisations handle personal data. Enexis Group takes responsibility for all aspects of the work carried out under its aegis, and we also find it important in this regard that we handle with due care the data which our customers and employees entrust to us.

The [Employee Privacy Statement](#) sets out what is done with your personal data and to which purpose. The statement also provides information about the length of time for which we store personal data and where you as an employee can address any questions you might have concerning the use of your personal data.

Careful handling of personal data

As an employee of Enexis Group, you contribute to the careful handling of personal data. In order to help you with this, we have drawn up a number of Privacy Principles:

1. Personal data may only be processed for purposes set in advance and clearly delineated.
2. Data subjects have various rights under the GDPR and these are respected.
3. Our data is accurate and is only stored for as long as is necessary.
4. Personal data is used as communicated, and within the data subject's reasonable expectations.
5. Personal data is adequately protected when passed on to others.
6. Personal data is well-protected and secured in order to safeguard confidentiality.
7. Personal data is used transparently and comprehensibly.

Enexis Group may not use the data of customers or employees at will. The privacy of the data must first be given due consideration. For example, the use of customer data must be necessary to fulfil Enexis's statutory duties, in line with an agreement or in accordance with the approval granted by the customer or employee concerned. If you require further information or have a question regarding privacy, please contact the [Privacy Officers or Privacy Contact Persons](#).

IN PRACTICE

A colleague has a file containing standard annual usages and information concerning the presence of solar panels. There are no customer names in the file, and the data is related to the address and a code for the connection. This data is also privacy-sensitive. The data can be linked to specific people via access to other systems, using the code and the address. Prior to working with this file, the privacy of the data must be given due consideration.

Proof of identity

Sometimes it is necessary, obligatory or desirable that you identify yourself or furnish proof of identity. For example, in order to work at a customer station, on a company visit or at a hotel when you go on holiday. It is important to protect your personal data well in this regard.

How do you prevent identity fraud? [The "Learning how to provide proof of identity safely!" Factsheet](#) provides you with useful information and tips on how to provide proof of identity safely.

Think from the customer or employee's perspective

If you process personal data for a specific purpose, always think from the perspective of the Enexis customer or employee. Is it clear to them that Enexis is processing the data for this purpose, and do they also expect that? Know what has been agreed with the customer in respect of the use of this data, and stick to it. A customer or employee is also always entitled, for example, to review the personal data of his or hers that Enexis uses.

Work according to clear agreements with external parties

The IT systems or services of external parties are often used in projects and processes. Enexis remains responsible for the careful processing of personal data. Do you intend to purchase a system or service from an external party? Then please read the "Digital Security and Privacy in suppliers' relationships" for more information. If you cannot find the information you need, please contact one of your department's [Privacy Officers](#) or [Security Officers](#).

4.4.6 HANDLING OF CONFIDENTIAL INFORMATION

During the performance of our working activities, we use a lot of information, much of which is confidential. We are required to handle this with due care. But how do we actually do that?

Tips for handling confidential information safely and carefully:

- Keep your password secret and share it with no one.
- Lock your laptop and clear up any confidential papers if you leave your workstation even briefly.
- Store confidential information (files, documents, USB sticks and other information carriers) carefully, for example in a locked cabinet or locker.
- Do not leave any information behind in any meeting rooms on e.g. a whiteboard or flip chart.
- For the disposal of confidential information, use the closed containers at our locations. Do you work at home? If so, do not dispose of confidential information in paper destined for recycling.
- Take due care regarding your location when holding confidential conversations, and think about who might be able to hear what is being said.
- Use a privacy screen on your laptop, so that others cannot see your screen. You can order one of these via the Enexis ordering portal.

It may sometimes be necessary to share confidential information with an external party, e.g. a supplier. Only do this when concrete agreements have been made with the external party with regard to the confidentiality of the information. Preferably, you should use SharePoint or Teams to share this information. You can share information with external parties securely through these environments. Do you require more information on the use of SharePoint or Teams, or on how to share information with external parties? Please contact our Modern Working Team via the [IT Service Portal](#).

4.4.7 REPORTING OF SECURITY OR DATA BREACHES

Despite all of the measures we take at Enexis Group to cover risks to privacy, things can still go wrong. It is important that you report cases of potential [security or data breach](#) to the IT Service Desk via +31 (0)88-8574444 or security@enexis.nl.

IN PRACTICE

After work, a number of colleagues go for a bite to eat nearby. One of the colleagues does not want to bring her heavy bag with her, so she leaves it in her car. When she returns from the meal, her window has been shattered and the bag containing her laptop has been stolen. She shudders to think that she has stuck a post-it with her password written on it onto her laptop, because she had just changed the password. She immediately reports the theft and possible data breach to the IT department via +31 (0)88-857 4444. She also immediately reports the incident to the police.

Enexis has an obligation to report data breaches and is obliged to analyse potential data breaches within 72 hours, notifying data subjects and the regulator (the Dutch Data Protection Authority, or DPA) where necessary. There is also a reporting obligation with regard to specific security incidents in the fields of IT and OT.

Additionally, it may be important for data subjects - usually customers and employees - to know when their data has been leaked, so that they are not surprised when their privacy-sensitive information has entered the public domain as a result of the actions of Enexis. Therefore, please take immediate action if you have discovered a potential security or data breach.

[TO THE TABLE OF CONTENTS >](#)

5. MONITORING, SPECIAL INVESTIGATIONS AND SANCTIONS

5.1 MONITORING

In order to be able to secure and safeguard the digital safety of Enexis, its customers and its employees, use is made of monitoring. This means that we not only keep an eye on our most important company applications (including those related to IT) and our OT network, but that we also monitor all workstations, incoming email and internet traffic.

In the present world of fast-changing threats (and in particular, cyber-threats), monitoring is carried out so that we can intervene where such threats arise, to limit these threats and any potential damage to Enexis or its employees in relation thereto as much as possible. Whenever monitoring takes place, the interests of the organisation are balanced against the possible impact on the privacy of our employees or customers. Enexis will always strive to avoid or minimise any impact on its employees or customers.

Where possible, monitoring is done by automated means, and in principle, is always aimed at systems, not people. On the basis of alerts, designated OT or IT employees will investigate whether any incidents (and in particular, security incidents) have occurred. In this way, the investigation may lead to one or more people. Where that is the case, a [special investigation](#) is started.

IN PRACTICE

When one of our IT Security Operations Centre colleagues receives all kinds of security notifications on his smartphone at the weekend, stating that an important IT system is unresponsive, he investigates what is going on. He quickly discovers that a malicious actor has gained access to the system. In order to protect the organisation against further damage, he ensures that the malicious actor is prevented from accessing the IT system, and that he/she can no longer enter it. In order to investigate who exactly the malicious actor was, and what exactly he/she has done, our colleague is authorised to carry out an investigation using the monitoring tools. If it transpires that the person is potentially an Enexis employee, the colleague notifies the Special Investigations team.

Given that the OT and IT environments both have their idiosyncrasies, they are each monitored by separate teams. The IT Security Operations Centre team has been assembled in respect of the IT environment, where the focus lies on the workstations and company applications, in order to implement the monitoring and following-up of incidents. The OT Security Operations Centre team has been assembled in respect of the OT environment, where the focus lies on controlling our energy networks.

5.2 SPECIAL INVESTIGATIONS

Following incidents and ([SAVE](#)) notifications, Enexis may launch a [special investigation](#). In such cases, the notification comes in to one of the members of the Special Investigations team, or via the [anonymous Hotline](#). Following the notification, the members of the team concerned gather to determine whether further investigation is required, and if so, what requires investigation. In case of special investigation, privacy on the one hand, and justified interest on the other are always balanced very carefully against one another.

Where an abuse is thought to have occurred, this is further investigated within Enexis by the Internal Audit & Risk department. They have a variety of possibilities at their disposal for doing so. For example, in case of a concrete suspicion of an abuse or criminal offence, cameras may be installed, or recorded images requested. Moreover, in such cases, internet use can be checked and general information (including financial information) be traced. If you suspect or have confirmation of an abuse, you can report this to your supervisor, one of the confidential advisors, the [anonymous Hotline](#), or an [Internal Audit & Risk](#) department employee.

5.3 SANCTIONS

Where an employee breaches rules or procedures, or falls seriously short in respect of attitude or behaviour, the employer may sanction the employee in question. A number of provisions are included in the Collective Labour Agreement for Network Companies (CAO Netwerkbbedrijven) in this regard. The [Collective Labour Agreement for Network Companies](#) may be found in the HR Information Centre. In case of serious breaches, the sanction of dismissal - potentially immediate - may also apply. Enexis also exercises due care in these kinds of cases, by taking all of the circumstances into account and investigating matters thoroughly.


[TO THE TABLE OF CONTENTS >](#)